

**STATE UNIVERSITY SYSTEM OF FLORIDA**  
**BOARD OF GOVERNORS**  
**Audit and Compliance Committee**  
March 28, 2019

**SUBJECT:** Board of Governors Compliance Program Approval

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**PROPOSED COMMITTEE ACTION**

Approval of *State University System of Florida Board of Governors Compliance Program*.

**AUTHORITY FOR BOARD OF GOVERNORS ACTION**

Article IX, Section 7, Florida Constitution

**BACKGROUND INFORMATION**

In fulfilling the Inspector General and Director of Compliance's (OIGC) responsibilities for the compliance function of the Board of Governors Office, Inspector General and Director of Compliance Leftheris has developed the *State University System of Florida Board of Governors Compliance Program* for the Committee's review and consideration for approval.

The United States Sentencing Commission publishes the *Federal Sentencing Guidelines for Organizations* ("Guidelines"), which recommends that all organizations, including higher education institutions, have a comprehensive compliance program in place. Such a program should be designed to prevent and detect criminal conduct. Chapter 8 of the Guidelines lists and defines the seven elements required for an effective compliance program, which are incorporated in the "Compliance Program Structure" section of this document. The Guidelines continue to serve as the standards upon which compliance and ethics programs in all sectors are developed.

Once the Compliance Program is approved, IG Leftheris will develop the Board Office's compliance plan for the Committee to review and consider for approval at the June 2019 meeting.

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**Supporting Documentation Included:** *State University System of Florida Board of Governors Compliance Program*

**Facilitators/Presenters:** Ms. Julie Leftheris