

**STATE UNIVERSITY SYSTEM OF FLORIDA
BOARD OF GOVERNORS
March 28, 2019**

SUBJECT: Board of Governors Compliance Program Approval

PROPOSED BOARD ACTION

Discussion and approval of the *State University System of Florida Board of Governors Compliance Program*.

AUTHORITY FOR BOARD OF GOVERNORS ACTION

Article IX, Section 7, Florida Constitution

BACKGROUND INFORMATION

The Chair of the Audit and Compliance Committee will present the *State University System of Florida Board of Governors Compliance Program* to the full Board for review, with a recommendation 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, Inspector General and Director of Compliance Leftheris will develop the Board Office's compliance plan for the Committee and full Board to review and consider for approval at the June 2019 meeting.

Supporting Documentation Included: Information located in the Audit and Compliance Committee materials