

STATE UNIVERSITY SYSTEM OF FLORIDA
BOARD OF GOVERNORS
Audit and Compliance Committee
September 22, 2016

SUBJECT: Public Notice of Intent to Create Regulation 4.003 State University System
Compliance and Ethics Programs

PROPOSED COMMITTEE ACTION

Approve public notice of intent to create Board of Governors Regulation 4.003 entitled
State University System Compliance and Ethics Programs.

AUTHORITY FOR BOARD OF GOVERNORS ACTION

Article IX, Section 7, Florida Constitution; and Board of Governors Regulation
Development Procedure

BACKGROUND INFORMATION

Board of Governors Regulation draft 4.003 State University System Compliance and
Ethics Programs was developed to capture information in Chapter 8 of the Federal
Sentencing Guidelines. The draft regulation was developed at the direction of the
Board of Governors Audit and Compliance Committee and is designed to set minimum
requirements for university compliance and ethics programs based upon the guidelines
in the Federal Sentencing Guidelines Manual.

The regulation draft is the result of almost two years of communications with State
University System (SUS) Chief Audit Executives, Chief Compliance Officers, Provosts,
Boards of Trustees Audit Committees, and General Counsels. In coordination with the
June 2016 Board of Governors meeting, the Office of Inspector General and Director of
Compliance (OIGC) hosted a Regulations Development Workshop, led by Audit and
Compliance Committee Chair, Alan Levine. Chief Audit Executives, Compliance
Officers, and General Counsels were invited to participate to discuss this regulation
along with three other draft regulations (also being considered for public notice at this
meeting).

Pursuant to the regulation procedure adopted by the Board at its meeting March 23, 2006,
the Board is required to provide public notice by publication on its website at least 30 days
before adoption of the proposed regulation.

Supporting Documentation Included: Draft Regulation 4.003

Facilitators/Presenters: Mr. Joseph Maleszewski