

**STATE UNIVERSITY SYSTEM OF FLORIDA  
BOARD OF GOVERNORS**  
September 22, 2016

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

---

**PROPOSED BOARD 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).

If approved, the regulation will be noticed on the Board's website for 30 days with final approval by the Board at the November 3, 2016, meeting.

---

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