



**OPERATING RULES AND PROCEDURES OF THE
UNIVERSITY OF CINCINNATI
COMPLIANCE BOARD
(March, 2009)**

INTRODUCTION

As recommended by the President's Working Group on Compliance and adopted by the President in July, 2006, the President of the University of Cincinnati has appointed a university Compliance Board (Board). The mandate of the Board is to monitor the university's overall compliance with applicable laws and regulations; to oversee efforts to educate the university community (faculty, staff, students, and administration) concerning compliance requirements; and to make recommendations to the President and Board of Trustees for administrative action and allocation of resources as needed to ensure compliance.

I. Composition

The Compliance Board will be composed of an Executive Oversight Committee (EOC), which shall include a standing Compliance Advisory Subcommittee (CAS), and a Responsible Officials Committee (ROC).

A. Executive Oversight Committee

The Executive Oversight Committee shall consist of the following persons or their designees:

1. Senior Vice President for Administration and Finance;
2. Vice President for Research;
3. General Counsel;
4. Director of the Department of Internal Audit;
5. The Provost;
6. Vice President for Student Affairs;
7. The Chair of the Faculty Senate; and
8. The Chair of the Faculty Senate's Research Committee

B. Compliance Advisory Subcommittee

The Compliance Advisory Subcommittee shall be a standing committee of the Executive Committee. The CAS shall consist of five members, two of whom shall be the General Counsel and the Director of the Department of Internal Audit. The remaining three members of the subcommittee shall be appointed by the EOC.

C. Responsible Official Committee

The ROC shall be composed of members of the CAS and those individuals identified as responsible for overall compliance in one or more of the compliance subject matter areas established by the EOC (Responsible Officials). A list of compliance subject matter areas, together with the names of the Responsible Official for each area shall be maintained by the CAS and shall be available on the institutional compliance website.

II. Duties

A. Executive Oversight Committee

The EOC shall be responsible for the following:

1. Overall monitoring of institutional compliance;
2. Evaluation and prioritization of institutional compliance risks;
3. Establishing institutional compliance strategies;
4. Establishing or reconfiguring the compliance subject matter areas and designation of Responsible Officials;
5. Reporting quarterly to the President and annually to the Board of Trustees Audit subcommittee.

The EOC shall meet quarterly. Special meetings may be requested by the CAS.

B. Compliance Advisory Subcommittee

The CAS shall be responsible for the following:

1. Initiating compliance audits;
2. Reviewing annual compliance reports of the Responsible Officials;
3. Ensuring that existing or new compliance subject matter areas are assigned to a Responsible Official;
4. Reviewing the reports of the university's outside auditors for compliance issues;
5. Recommending compliance priorities and strategies to the EOC.

C. Responsible Official Committee

The ROC shall meet as needed, but not less than quarterly, to consider matters of common interest. Such matters may include realignment or establishment of new compliance subject matter areas, compliance techniques that have broad application, methods to leverage technology to enhance education or communication on compliance matters, common compliance concerns and compliance priorities. Recommendations from the ROC shall be transmitted by the CAS to EOC.

D. Responsible Officials

Each Responsible Official shall be responsible for the following:

1. Overall compliance in the assigned subject matter area(s);
2. Ensuring that appropriate policies are promulgated;

3. Ensuring that appropriate training is made available for both those assisting in compliance and for “end users”;
4. Keeping informed of changes in the university’s compliance obligations in the subject matter area(s) to which the Responsible Official is assigned;
5. Maintaining an appropriate level of compliance information both on the Responsible Official’s unit home and on the institutional compliance website(s);
6. Preparing an annual compliance report for the assigned subject matter area(s).

III. Annual Reports

An annual report shall be prepared for each compliance subject matter area by the Responsible Official at a time and in a form prescribed by the CAS. The annual report shall include information on changes in compliance obligations, initiatives to ensure and monitor compliance, educational resources available, compliance concerns and any plans to enhance compliance in the coming year. After review by the CAS, these reports shall be submitted to the EOC.

IV. Submission of Matters for Review by the Compliance Board

A matter may be brought to the attention of the Board through a written request submitted to the CAS. Review of a submission may be declined if, in the sole discretion of the CAS, the matter submitted is deemed not to involve a question within the mandate of the Board.

V. Reports

The EOC shall prepare a report and recommendations to be submitted to the President and the President’s cabinet not less than quarterly. The report shall review the activities of the Board for the preceding quarter, along with any recommendations for action approved by the Board. The EOC shall also prepare a comprehensive Compliance Report to be presented to the Board of Trustees Governance and Audit Committee annually.

VI. Role of the University and Outside Counsel

Any committee of the Board and any Responsible Official may seek advice and assistance from University Counsel or outside Special Counsel if University Counsel deems it necessary.