



## Charter of the Emory University Office of Compliance

### **MISSION STATEMENT:**

The Emory University Office of Compliance (Office of Compliance) is committed to helping ensure that Emory University's activities adhere to the highest legal, professional, and ethical standards. The Office of Compliance assists University units in complying with the laws, regulations and policies that govern institutions of research and higher education through education; assessment; assistance with policy and process development; auditing; and monitoring.

### **PURPOSE:**

The designation of an independent compliance office and compliance officer that reports to the highest levels of an organization's administration is a requirement of an effective compliance program, and the Office of Compliance was established to fulfill this important role. The Office of Compliance assists University units in complying with the laws, regulations and policies that govern institutions of research and higher education through education; assessment; assistance with policy and process development; auditing; and monitoring.

### **INDEPENDENCE:**

To provide for the independence of the Office of Compliance, the Office reports to the Executive Vice President for Academic Affairs and Provost, the Executive Vice President for Business and Administration, and the Executive Vice President for Health Affairs. Line management for the Office of Compliance is provided through the Executive Vice President for Academic Affairs and Provost. The Chief Compliance Officer heads up the Office of Compliance.

### **AUTHORITY:**

In order to meet its responsibilities and maintain independence, the Office of Compliance is authorized to have access to University records, documents, facilities, and personnel necessary to conduct compliance assessments, training, audits, monitoring and investigations. The University's administration will ensure that units and personnel cooperate with the Office of Compliance in carrying out its compliance activities. Reports generated from the Office of Compliance's assessments, audits, monitoring and investigations will be provided to appropriate university administrative personnel and/or legal counsel. When specific findings or issues of non-compliance are identified, the administrative personnel with authority over the activities reviewed shall be responsible for developing and implementing necessary corrective action plans. Corrective action plans may be submitted to the Office of Compliance for review and input. Although the Office of Compliance shall conduct assessments, audits, monitoring and investigations, responsibility for compliance shall remain with the area/unit reviewed, not the Office of Compliance.

### **COORDINATION WITH OTHER UNITS:**

The Office of Compliance coordinates with Emory University Internal Audit, Emory Healthcare Office of Compliance and Emory University Office of the General Counsel through membership of all of these

units on the Executive Compliance Committee (ECC). The ECC meets regularly to discuss compliance issues, coordinate efforts, and collaborate on compliance initiatives.

**ACCOUNTABILITY, RESPONSIBILITY AND SERVICES:**

The Office of Compliance assists the University by monitoring operational compliance with the laws, regulations and policies that apply to Emory as an institution of higher education. The Office of Compliance is accountable to University management and the Audit and Compliance Committee in providing independent oversight for the University's administrative and research compliance program. The Office of Compliance carries out this responsibility by performing the following services:

- Overseeing and providing assistance with risk assessment process and prioritizing risks.
- Developing awareness and expertise in statutory/regulatory requirements and keeping abreast of new statutory/regulatory developments.
- Assessing program compliance with governing statutes, regulations and policies.
- Providing assistance when regulatory agencies review University compliance with statutory/regulatory compliance.
- Developing an annual compliance plan, including auditing and monitoring elements, based on risk assessment/prioritization.
- Providing input on policy and process development to ensure compliance, as well as receiving and providing input on corrective action plans to remedy compliance deficiencies.
- Receiving, investigating and providing appropriate follow-up with respect to concerns expressed via the Trust Line and other reporting routes, in accordance with applicable University policies.
- Reporting findings to programs, schools, units and the Audit and Compliance Committee of the Board of Trustees.
- Providing training and educational opportunities to the Emory community on compliance issues and ethical decision-making.

**INTEGRITY AND CONFIDENTIALITY:**

Recognizing the private nature of the information to which it may have access, the Office of Compliance operates with the highest level of integrity and respect for the confidentiality of sensitive information.

*Approved by Audit and Compliance Committee of the Board of Trustees April 24, 2016*