

**OFFICE OF UNIVERSITY COMPLIANCE
Charter**

Authority, Governance, and Oversight

The University of Connecticut, including UConn Health (collectively “UConn”), is committed to the highest standard of ethical conduct and integrity demonstrated by its compliance with applicable laws, regulations, and policies. A primary function of the University of Connecticut’s Board of Trustees and UConn Health Board of Directors (collectively the “Board”) is to ensure UConn is effective in the administration and in its operations relative to compliance and ethics.

To demonstrate UConn’s commitment to compliance and ethics, the Joint Audit and Compliance Committee of the Board of Trustees (JACC) has established the Office of University Compliance (OUC) to help UConn’s efforts to adhere to all federal and state regulatory requirements. To ensure appropriate objectivity and access to the highest levels of leadership, the OUC reports directly to the Office of the President with a dotted line to the JACC.

Office of University Compliance

In order to reach optimum effectiveness, the Chief Compliance Officer (CCO) is responsible for the leadership and oversight of the OUC. The CCO has the sole discretion to determine the functions of the OUC and the coordination of the University’s Compliance Program (“Compliance Program”) without interference or compromise. As such, the OUC is authorized to have access to UConn records, facilities, systems, and personnel necessary to fulfill its responsibilities. Senior Leadership will ensure departments/units and personnel fully cooperate with the OUC in the execution of its obligations. The OUC shall be appropriately resourced with dedicated staff to assist in the implementation, facilitation, and evaluation of the Compliance Program.

The CCO and the OUC staff shall be members of appropriate professional associations and participate in applicable continuing education to remain abreast of best practices and emerging issues related to compliance and ethics in higher education, including academic medical centers. The CCO will maintain applicable certifications, as appropriate. Other OUC staff may be required to obtain applicable certifications at the direction of the CCO. The CCO and OUC staff are independent in fact and appearance through their demonstration of integrity, objectivity, confidentiality, professionalism, and competency. The CCO and OUC staff are objective in their work, employing independence of judgement above influence or control of any kind.

Purpose

The purpose of the OUC is to promote and maintain an institution-wide culture of compliance and ethics through the coordination of UConn’s de-centralized Compliance Program. The OUC aims to assist departments/units in complying with laws, regulations, and policies that govern institutions of higher education and academic medical centers by satisfying the most updated requirements of the U.S. Sentencing Commission’s guidelines of an effective compliance and ethics program.

Scope and Responsibility

The CCO is responsible to develop, implement, assess, and manage the OUC and its activities to coordinate and support the Compliance Program, in consultation with the Office of the President and JACC. Under the Direction of the CCO, the OUC is responsible for:

- The University's Code of Conduct which may include but is not limited to periodic reviews, ongoing education, and socialization of its established standards and expectations.
- Facilitating an institutional compliance committee, engaging senior leadership in the coordination and priorities of UConn's Compliance Program.
- Managing UConn's policy process to ensure appropriate standards, policies, procedures are in place, are communicated appropriately, and are effectively guiding the operations of the institution.
- Establishing and providing a safe harbor to receive and direct reported concerns and compliance issues and ensure the institution completes a thorough review, investigation, and/or resolution, and takes action, as appropriate.
- Collaborating with departments/units on compliance monitoring in an effort to proactively identify opportunities for enhancement and to mitigate institutional risk.
- Developing and maintaining an effective education and training program to provide employees with required information to ensure adherence to institutional policies and procedures as well as federal and state laws.
- Communicating with Senior Leadership and the JACC to inform them of significant compliance activities and program effectiveness, as well as to inform them of any significant compliance concerns.

Adoption of Charter

Approved by Joint Audit and Compliance Committee

Date: March 1, 2018

Revised: February 16, 2023