

Clark Atlanta University

Compliance Office

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Chief Compliance Officer

Compliance is...

- The avoidance of fraud, abuse and institutional mismanagement
- Adherence to institutional policies and federal requirements
- “*Knowing what to do and doing what is right*”

Why is the University implementing a compliance program?

- Clark Atlanta University's Board of Trustees recognized the risk potential in managing its financial, operational, and reputation-related risk, and identified the need for a stronger system of checks and balances, where every employee is held accountable for his or her job responsibilities and actions.
- As such, the compliance program CAU is implementing is broader in scope than the program required by the compliance agreement CAU entered into with the Department of Energy.

Do other colleges and universities have similar programs?

- More and more universities are realizing the positive impact a compliance program can have on their schools.
- Institutions are creating these programs to ensure that their employees are properly handling and protecting their financial resources, operations, strategies, and reputation.

Mission

To promote and support a culture at Clark Atlanta University that integrates compliance into the daily activities of the University and to hold all members of the University community to the highest ethical standards.

Role of the Compliance Office

- Develop an effective Compliance Program that consists of six core elements

Compliance Program Elements

- Written Standards and Procedures
- Effective Oversight
- Delegation of Authority
- Training
- Monitoring
- Discipline

Written Compliance Standards and Procedures

Goal: *To have consistent and well-documented policies, procedures, processes and standards of conduct.*

Written Compliance Standards and Procedures

- Facilitate cross-functional team meetings resulting in the development and implementation of highly effective processes and procedures
- Create policies and standards of conduct that uphold the University's commitment to the highest ethical standards

Effective Oversight

Goal: *To ensure compliance with government regulatory requirements and University policies.*

Effective Oversight

- Chair a Compliance Committee to provide direction and guidance to the Compliance Office
- At least annually, report to the Board of Trustees' Finance and Audit Committee on CAU risk management process, effectiveness of internal controls and compliance
- Prepare annual status reports to the DOE in accordance with the terms and conditions of the Compliance Agreement
- Ensure that corrective actions or reasonable steps are implemented for A-133 audit deficiencies

Delegation of Authority

Goal: *To ensure that the signatory authority is delegated at the appropriate individual levels within the University for accountability and control.*

Delegation of Authority

- Partner with the VP of Finance to update signing authority guidelines
- Ensure guidelines are adhered to across the University community
- Implement a process where the assignment of responsibility and delegation of authority provide a basis for accountability and control

Training

Goal: *To improve compliance with regulations by raising awareness and understanding of applicable laws, regulations and University policies and procedures.*

Training

- Provide tangible evidence of the University's good faith efforts to adhere to all applicable laws, regulations and University policies and procedures
- Conduct mandatory compliance training for all relevant employees
- Enforce disciplinary actions for failure to attend mandatory trainings
- Facilitate education sessions on compliance issues such as Time and Effort Reporting
- Develop Code of Conduct Ethics Guide and certification process

Monitoring and Auditing

Goal: *To assess the effectiveness of the training, revised policies and procedures, internal controls, process management, etc.*

Monitoring and Auditing

- Conduct internal quality assurance reviews
- Request annual self-assessment of internal controls by function
- Investigate all calls received via the hotline
- Request and track annual Certification Letters and Conflict of Interest from relevant employees

Disciplinary Actions

Goal: *To ensure disciplinary actions are consistently enforced to encourage future adherence to the policies of the University and all regulatory requirements.*

Disciplinary Actions

- Develop a list of existing disciplinary actions designed to promote desired behavior
- Propose disciplinary actions to the Compliance Committee for compliance violations

Who do I contact for more information?

- Lucille H. Maugé, Chief Compliance Officer, can be reached by calling 404-880-6662.
- The Office of Compliance is located in Harkness Hall, Room 215.
- The Hotline can be reached by calling 404-589-8006 or by e-mailing compliancehotline@cau.edu.