

COMPLIANCE AND ETHICS COMMITTEE CHARTER

The FAU Compliance and Ethics Program (CEP) is intended to assist the University in achieving its financial, operational and strategic goals (as set forth in FAU's Strategic Plan for the Race to Excellence, 2015-2025) while promoting an organizational culture that encourages compliance with all institutional policies as well as federal and state laws and regulations. The CEP creates a structural foundation to prevent and detect violations of law and assist the University in encouraging ethical conduct. Ultimately, an effective compliance program ensures that there are adequate controls in place to reduce regulatory risks throughout the University and provides to the University President and the BOT Audit and Compliance Committee reasonable assurance that core compliance management practices are in place across the University for all compliance risk areas.

The following principles are recognized as important elements for an effective compliance program:

- Effective compliance oversight
- Periodic risk assessments to identify compliance risks;
- Policies, procedures and standards to detect and prevent violations of law;
- Effective training so that employees know the rules that apply to them;
- Monitoring and auditing to confirm that employees are following the policies;
- Prompt investigation and appropriate action to prevent similar offenses;
- Enforcement of policies through well publicized disciplinary guidelines;
- Periodic evaluation of the effectiveness of the CEP.

The Compliance and Ethics Committee (CEC) members will develop standards and a compliance framework to assess, monitor and report on the progress of implementing the elements reflected above for their specific compliance functions. The CEP will leverage that input and structure to provide reasonable assurance to the BOT Audit and Compliance Committee, the University President, and senior leadership that core compliance risk areas are managed in accordance with these recognized elements.

Committee Responsibilities:

1. Provide leadership and oversight in the implementation and continuous improvement of FAU's CEP and the implementation and enforcement of the responsibilities and elements set forth in Florida Board of Governor's Regulation 4.003, State University System Compliance and Ethics Programs;
2. Identify and assess current and emerging compliance risk areas that are relevant to the University's mission and objective;
3. Identify best compliance practices, program priorities, and recommend policies and procedures to effectuate necessary improvements;

4. Identify significant cross-jurisdictional compliance gaps, including determinations of “risk ownership,” mitigation strategies, and resource implications;
5. Develop and implement standards to assess compliance risks and objectives throughout the University. The standards will assist compliance risk owners in designing and maintaining programs for their respective compliance functions and will establish roles and responsibilities, track compliance implementation across risk areas, identify gaps and trends in compliance efforts and implementation of corrective action, and report progress to the President and the BOT Audit and Compliance Committee;
6. Assist with development of training and education on the CEP and compliance risk.
7. Sharing best practices across University compliance functions; and
8. Coordinating with other relevant University committees and/or activities.

The CEC shall be chaired by the Chief Compliance and Ethics Officer. CEC members shall be appointed by the University President. For the first year, the CEC shall meet bi-monthly (every other month). Thereafter, the CEC shall meet quarterly, or more frequently as circumstances dictate.

Adopted October 22, 2018