

# Universities of Wisconsin Administration Office of Compliance & Risk Management: Guiding Elements of the Compliance Framework

The six elements that guide the framework of the Universities of Wisconsin's compliance structure were selected based on a review of external sources, primarily the Federal Sentencing Guidelines of the U.S. Sentencing Commission and the United States Department of Justice 2019 Guidance, Evaluation of Corporate Compliance Programs.



## High Level Oversight

- The Board of Regents and senior leadership for the Universities of Wisconsin will be knowledgeable about the content and operation of the UWSA compliance program. The “tone at the top” will be visible, strong, and explicit. Specific individuals at each university will be delegated operational responsibility for the compliance program, and the programs will receive adequate stature, funding, and resources.

## Communication, Education, and Training

- Each university should take reasonable steps to communicate periodically and in a practical manner its standards and procedures by conducting effective training programs and otherwise disseminating information appropriate to individual roles and responsibilities.

## Reporting and Investigation

- Each university will take reasonable steps to publicize a system whereby the employees may report concerns or seek guidance regarding potential or actual misconduct without fear of retaliation. This includes the ability to report anonymously. After misconduct has been detected, the university will respond appropriately and take actions to prevent further similar conduct.

## Written Policies and Procedures

- Each university should establish standards and procedures to prevent and detect misconduct. The procedures should be in writing, easy to locate, understandable, and reviewed and updated regularly.

## Monitoring and Auditing

- Each university will take reasonable steps to ensure that its compliance program is followed. This includes monitoring efforts to detect misconduct and periodic evaluations of the effectiveness of the compliance program.

## Culture of Accountability, Ethics, and Integrity

- Each university's compliance program should be promoted and enforced consistently through well-publicized guidelines that provide incentives to support the program and disciplinary measures for engaging in misconduct or failing to take reasonable steps to prevent or detect misconduct. Each university will focus not only on regulatory compliance but on a culture that encourages integrity in all aspects.