The compliance program’s objective is to establish and promote standards that meet these seven elements of an effective compliance program:

• Standards and procedures to prevent/detect criminal activity
• Oversight by high-level personnel, with reports to the board
• Due care in delegating substantial discretionary authority
• Effective communication and training
• Systems for monitoring, auditing and reporting suspected wrong-doing without fear of reprisal
• Consistent enforcement of compliance standards
• Reasonable steps to respond to and prevent offenses
Compliance Charter

• Summarizes the mission of the compliance function for the University, including its Medical Center, and how the seven elements of an effective compliance program are met

• Incorporates best practices by using elements of compliance charters from other universities

• Specifies the professional standards and responsibilities related to the compliance program, and the interaction between the compliance, audit, and ERM functions