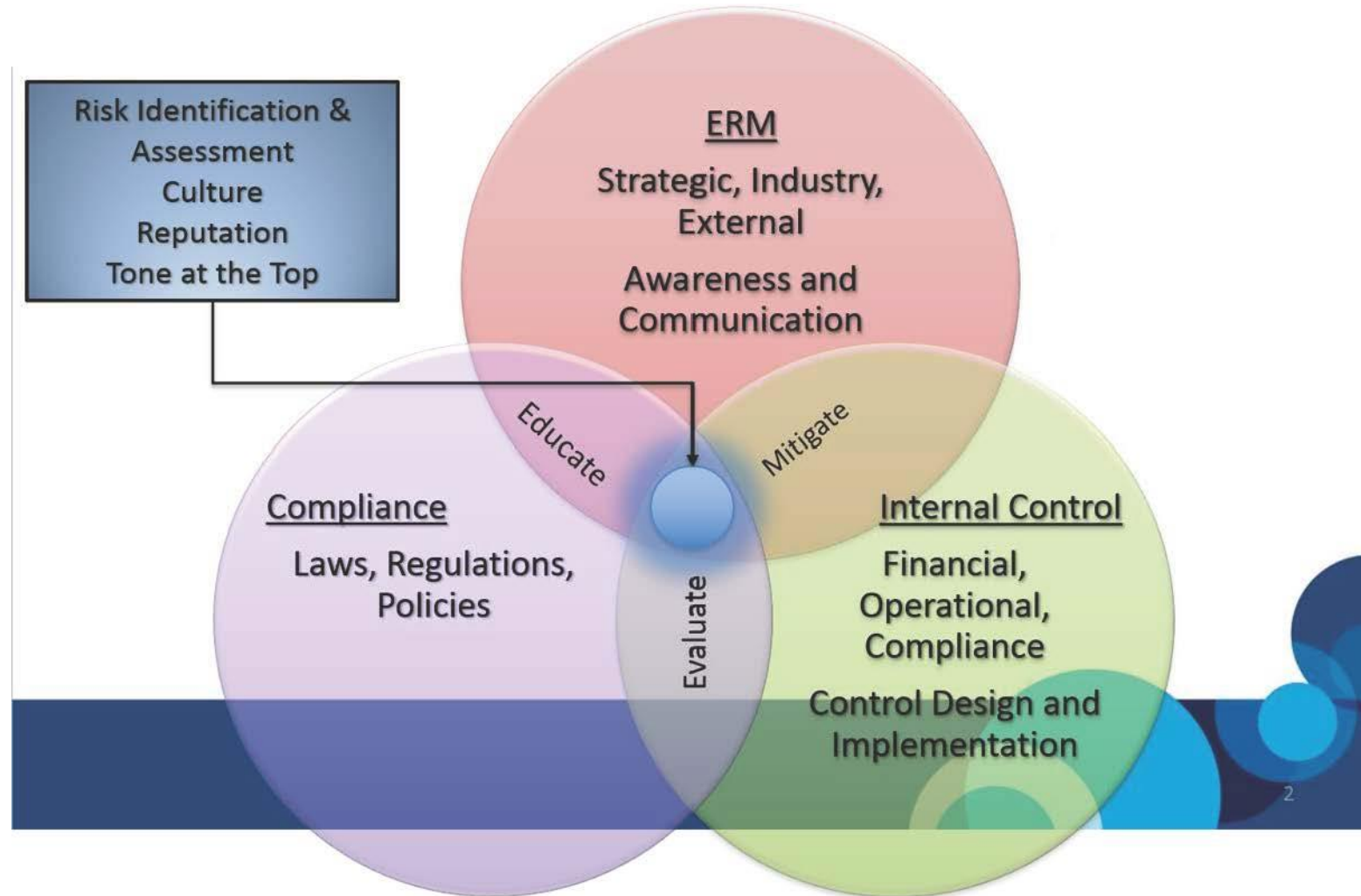


# COMPLIANCE/ERM UPDATE



Melissa J. Holloway, Esq.  
General Counsel

Risk Management, Audit, and Compliance Committee  
February 28, 2020



# COMPLIANCE PROGRAM UPDATE



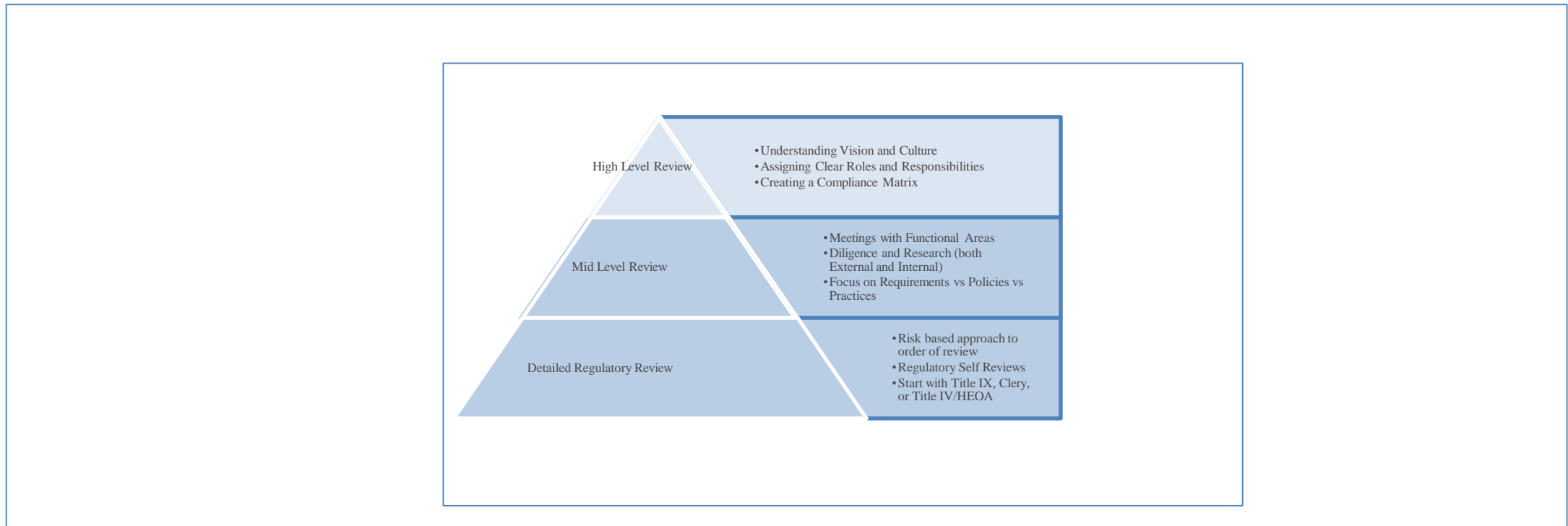
# **N.C. A&T COMPLIANCE PROGRAM**

## *Risk Assessment and Compliance Work plan*

- Compliance/ERM officer on board (March/April 2020)
- Compliance Matrix Development (Summer 2020)
- Compliance Committee (Fall 2020)
- Three Tiered Risk Assessment
  - > High Level Review (In progress – Spring/Summer 2020)
  - > Mid-level Compliance Risk Review (Spring 2021)
  - > Detailed Regulatory Review (Fall 2022)

# N.C. A&T COMPLIANCE PROGRAM

## *Three Tiered Risk Assessment*



# N.C. A&T COMPLIANCE PROGRAM

## *High Level Compliance Review*

- Compliance led review against the elements for an effective compliance and ethics program (*i.e.* the U.S. Federal Sentencing Guidelines).
  - Engage leadership on the subject of culture and ethics, and discussing a Code of Conduct.
  - Creation of a campus-wide Compliance Committee.
- As a first step towards assessing functional compliance, N.C. A&T will develop a Compliance Matrix which identifies a responsible party for each regulatory area.

## **N.C. A&T COMPLIANCE PROGRAM**

### *Mid-Level Compliance Review*

- Compliance Officer meets with the individual responsible for each of the functional compliance areas to assess the basic function and risk in that area.
  - understand the basic program and the risk, while demonstrating that institutional compliance is a resource.
  - Outline areas of deficiency or areas where compliance systems are immature.
  - discussion of concerns and possible changes with the individuals responsible for that area (unless there is a reason not to do so) and then with the appropriate leadership or committee.

## **N.C. A&T COMPLIANCE PROGRAM**

### *Detailed Compliance Regulatory Review*

- Compliance Officer (in conjunction with Internal Audit and others) should review the university's performance against individual regulations
  - > This type of detailed compliance review is time consuming, so start with the areas of greatest risk (based on analysis from the High and Mid level reviews)
    - Early candidates for detailed review will likely include Title IX, Clery Act, or Title IV/HEOA
    - Consider asking the functional compliance areas do a regulatory self-review and present it to Compliance (or perhaps the Compliance Committee), including citations and source documents



# ENTERPRISE RISK MANAGEMENT UPDATE



## ERM SCHEDULE

### *Cycle 3: 2019-2020*

- November/December 2019: Review mitigation efforts/status of 18-19 Risk Priorities
- December 2019: Submit 2019-2020 Priority Risks to GA
- Jan – April 2020: Continue risk management process; regular reporting to Cabinet
- April 2020: Final 19-20 Update to RMAC
- May 2020: Workshop to identify risks for 2020-21

# QUESTIONS?

AGG  
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