

UTMB Office of Institutional Compliance Departmental Policy

Section C	Compliance	07/06/2006	-Originated
Subject C.G	General Compliance		-Rev w/changes
Policy C.G.2	Action Plans to Enhance Compliance	Compliance	-Rev w/o changes -Author

Action Plans to Enhance Compliance

Audience

Entity Leaders, Institutional Compliance Committee (ICC) and identified responsible parties

Purpose

To ensure that each high risk compliance area identified by the ICC creates written action plans to enhance compliance in the identified high risk areas.

Policy

Issues that are identified as high-risk compliance issues for the institution must have a formal, written Action Plan to Enhance Compliance for each specific high risk issue.

Components of Action Plans to Enhance Compliance

The following components must be a part of each action plan to enhance compliance:

Issue Synopsis: A synopsis of the compliance issue that is being addressed.

Entity Leader: The name of the entity leader to which the compliance issue specifically relates.

Responsible person: The name of the person responsible for implementing the action plan assigned.

Compliance Liason: Name and title of individual assigned as the compliance liason for this workgroup.

Compliance Goal: A compliance goal that is specified in the form of a benchmark or metric that is attainable as a result of the action plan.

Reporting Frequency: The frequency with which reports will be provided to the ICO and the ICC.

Action Steps to

Achieve Compliance: A list of specific actions to be taken that will further the compliance. The action steps must include target dates for completion and should be specific, measurable, and relevant to the action plan.

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Monitoring Plan: Description of the monitoring that the responsible party will ensure is completed in order to determine that the action plan is implemented and working properly. The monitoring plan must include:

- Proposed sample description
- Proposed sample size
- Frequency of monitoring, i.e. daily, monthly, weekly, quarterly. Frequency may be no less than quarterly.
- Proposed results format
- Frequency of reporting results to ICC and Institutional Compliance Officer.

Education Plan: A description of the education and training program that the responsible party will effect regarding the specific high risk issue. The education plan must include:

- Description of the actual training.
- Estimated numbers of each type of employee to be trained.
- Identify the actual person(s) who will do the training by name and title.
- Frequency of the training, i.e., weekly, monthly, quarterly, annually.
- Documentation – describe how the documentation of the training will be recorded and maintained.
- Frequency of reporting education results to ICC and ICO.

Completion Dates Action Plans to Enhance Compliance must be completed and submitted to the ICO and the ICC the latter of September 15th of each fiscal year or within 30 days of assignment of the specific risk to the responsible party.

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References

U. T. System
