

UTMB Office of Institutional Compliance Departmental Policy

| | | | |
|--------------|----------------------------|-------------------|------------------|
| Section C | Compliance Policies | 05/08/06 | -Originated |
| Subject C.G | General Compliance Issues | | -Rev w/changes |
| Policy C.G.3 | Compliance Risk Assessment | | -Rev w/o changes |
| | | Compliance Office | -Author |

Compliance Risk Assessment

Audience

The information in this document is for all UTMB employees, students, patients, customers, and independent contractors.

Purpose

This policy and procedure serves as the guideline utilized by the Office of Institutional Compliance (OIC) for assessing compliance risk at the institution.

Policy

The UTMB OIC along with the ICC is charged with assessing compliance risk institutionally. The purpose of the risk assessment is to:

- identify high-risk compliance issues;
- establish a priority for these issues;
- establish monitoring activities that review processes to advance compliance; and
- prepare the annual work plan for the OIC.

Various methods are employed to assess risk on an annual basis. The OIC may conduct: comprehensive risk assessments, a validation of the prior year's issues, or an enterprise wide risk assessment with UTMB Audit Services Department.

Administrative Process

Institution employees play a critical role in the risk assessment process as they are relied upon as knowledge sources, disseminating information that must be considered in the assessment of risk. A combination of surveys and interviews are used to gather information. Periodically, the OIC will conduct a comprehensive risk assessment otherwise; a validation process will take place annually.

In addition to input from management and staff, the OIC considers various other sources during the risk assessment process. These sources include the Office of Inspector General Work Plan published each year in October, UT system initiatives, OIG Compliance Program Guidance, court cases, and various compliance periodicals.

UTMB Office of Institutional Compliance Departmental Policy

| | | | |
|--------------|----------------------------|-------------------|------------------|
| Section C | Compliance Policies | 05/08/06 | -Originated |
| Subject C.G | General Compliance Issues | | -Rev w/changes |
| Policy C.G.3 | Compliance Risk Assessment | | -Rev w/o changes |
| | | Compliance Office | -Author |

References

Business Procedures Memorandum 63-02-02 Institutional Compliance Program
US Sentencing Commission- Federal Sentencing Guidelines (Chapter 8, Part B, Section 2) Effective Compliance and Ethics Program
