

UTMB Office of Institutional Compliance Departmental Policy

Section C Subject C.G Policy C.G.1	Compliance Policies General Compliance Issues Compliance Risk Assessment	05/08/06-Originated -Rev w/changes -Rev w/o changes Compliance Office-Author
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High Risk Work Groups

Audience	Entity leaders, Institutional Compliance Committee (ICC), Institutional Compliance Officer (ICO), and identified responsible parties.
Purpose	This policy and procedure serves as the guideline utilized by the ICC and the Office of Institutional Compliance (OIC) for assuring that high risk areas are being addressed and monitored by appropriate action, education, review, and monitoring processes.
Policy	Compliance risk areas that are identified as high risk by the ICC must have a work group leader assigned by the ICC and high risk working group members must be appointed by the work group leader.
Composition of the High Risk Working Group	Work group members are appointed by the work group leader, and should include at least each responsible party for high risk issues relating to the work group identified by the ICC.
Frequency of Meetings	Meets at least monthly and more often if necessary to accomplish the action plans to enhance compliance.
Responsibilities of the High Risk Work Groups	The responsibilities of the high risk work groups include but are not limited to the following: <ul style="list-style-type: none">• evaluates risks associated with the specific high risk area;• establish a priority for these issues;• ensure that adequate training is developed and delivered to the appropriate individuals to mitigate the risks identified in the risk assessment,• oversee the development of a monitoring program that ensures that the risks have been mitigated;• establish monitoring activities that review processes to advance compliance; and• establish metrics for accuracy and level of compliance;

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- discuss compliance trends and issues;
 - discuss progress toward completing action plans to enhance compliance;
 - develop preventive strategies for compliance;
 - identify areas for investigation;
 - keep minutes of the group, and
 - report to ICC.
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**Compliance
Liaison**

A compliance liaison will be assigned to each high risk working group by the ICO.

**Reporting
Structure**

The work group leader, responsible parties, and the high risk compliance work groups report to the appropriate entity leader, ICO and the ICC.

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
