

**UTMB Office of Institutional Compliance Departmental Policy**

Section C	Compliance Policies	07/05/2006	-Originated
Subject C.S	Structure		-Rev w/changes
			-Rev w/o changes
<b>Policy C.S.2</b>	<b>Institutional Compliance Committee</b>	Compliance	-Author

## **Institutional Compliance Committee**

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<b>Audience</b>	All UTMB employees
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<b>Purpose</b>	To establish an Institutional Compliance Committee (ICC) for the institution that provides executive level input and decisions regarding compliance issues of the institution.
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<b>Policy</b>	The President of the institution will establish and appoint an ICC with decision-making authority for the institution. The committee will provide oversight, direction, advice, and decisions related to compliance issues before the committee.
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<b>Composition of the Institutional Compliance Committee</b>	<p>The ICC consists of the following administrative positions, which are permanent members of the ICC:</p> <ul style="list-style-type: none"><li>• UTMB President</li><li>• Institutional Compliance Officer (ICO)</li><li>• Chief Academic Officer and Vice President of Academic Program Administration and Services, Dean of Medicine</li><li>• Vice President and Chief Executive Officer for UTMB Hospitals Clinics</li><li>• Chief Financial Officer</li><li>• Associate Dean for Research</li><li>• Vice Dean for Clinical Programs and Planning, and Chief Physician Executive</li><li>• Director, Legal Affairs</li></ul> <p>The ICO shall chair the ICC.</p>
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<b>Frequency of Meetings</b>	The committee shall meet no less than quarterly but may meet as often as necessary to perform the responsibilities of the committee.
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<b>Responsibilities and Duties</b>	<p>The following are the duties and responsibilities of the Institutional Compliance Committee:</p> <ul style="list-style-type: none"><li>• ensure that an annual risk assessment is conducted and that</li></ul>
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appropriate processes are implemented to control or manage the identified risks;

- assigns responsibility at all levels of management and establishes clear lines of program authority;
  - charge the Institutional Compliance Officer with sufficient authority to immediately halt any non-compliance issue to prevent possible ongoing non-compliance;
  - establishes an Office of Institutional Compliance charged with the authority to establish oral and written standards for the institution to effectively comply with all federal and state regulations and to ensure standard interpretation and application of regulations across the institution;
  - determines the appropriate strategy/approach to promote compliance with the program and detection of any potential violations, such as through hotlines and other fraud-reporting mechanisms;
  - ensures that adequate resources are allocated to high risk working groups of the institution;
  - ensures that the high risk work groups meet and accomplish the goals and responsibilities of the work group and that the work group reports to the ICC in a timely manner;
  - ensure that the compliance program is designed to prevent and/or detect violations of the law, UT System policies, or UTMB policies;
  - ensures communication of the compliance program to all employees, students, and contractors;
  - recommends and monitors, in conjunction with relevant departments, the development of internal systems and controls to carry out the organizations standards and policies and procedures;
  - analyzes the organization's industry environment, the legal requirements with which it must comply, and specific risk areas;
  - assesses existing policies and procedures that address these areas for possible incorporation into the compliance program;
  - develops a system to solicit, evaluate, and respond to complaints
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and problems.

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**References**

Compliance Monitor 2006  
U. T. System

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