



TEXAS WOMAN'S
UNIVERSITY

Texas Woman's University Compliance Partner Responsibilities

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Background

Compliance is the responsibility of all faculty, staff, students, and guests at Texas Woman's University (TWU). However, certain employees have additional compliance duties because of specific compliance-related roles and responsibilities. These personnel have been assigned the title *compliance partner*. Together, these partners make up the TWU compliance network.

The compliance partner is an important role within the TWU compliance network. Compliance partners are the primary contact for compliance program activities in each area (or partial area) as defined by the Higher Education Compliance Alliance "Topics."¹ The compliance partner may be a staff member, manager, director, or senior-level vice president, depending on the area's scope. The responsibilities outlined below will become a part of the compliance partner's work plan or list of assigned duties. The responsibilities envisioned include:

Compliance Priorities

Compliance partners will work to identify and evaluate compliance priorities to enable their cabinet member and senior management to more effectively align compliance resources with compliance risks and operational needs.

Compliance Plans and Assessments

Compliance partners, working with other individuals as necessary, will complete a basic compliance plan, which includes a process for doing a compliance risk assessment. The Office of Compliance can assist with the initial compliance plan. The risk assessment will be based on the statutory summaries that TWU receives from the Higher Education Compliance Alliance. Every few years the Office of Compliance will assist with a compliance self-assessment.

Compliance Goals

Based upon the results of a self-assessment or external compliance program evaluation, as well as priorities established by their executive managers, compliance partner will establish an initial compliance action plan. This plan will include detailed expectations for compliance activities during the current academic year.

Compliance Reporting

Compliance partners will be responsible for reporting compliance concerns and activities to their senior manager and the Office of Compliance. Reports should occur semi-annually, and may be more frequent as needs arise. The Office of Compliance will work with compliance partner to develop a reporting template. This streamlined reporting process will enable those concerned with compliance to more effectively raise issues to leadership who can then, in turn, evaluate TWU operational compliance programs.

Compliance Program Activities

Compliance partners will be responsible for coordinating, or working with other interested parties to coordinate, compliance program activities, which will include:

- Identifying compliance requirements and conducting regular compliance risk assessments

As compliance requirements and risks dictate:

- Clarifying compliance roles and responsibilities
- Evaluating, updating, writing compliance policies, regulations, and procedures
- Identifying training, education, and awareness needs
- Establishing effective communication lines among those with compliance roles and responsibilities and those who are required to comply
- Implementing, promoting, and enforcing compliance-related policies and procedures
- Monitoring and auditing compliance status—is TWU in compliance or out? Reporting monitoring/auditing results (and other activities) to senior management and the Office of Compliance. If TWU is out of compliance, do we need to self-report? Also, measure compliance program effectiveness on an annual or bi-annual basis. Compliance Partners will work with the Office of Compliance to 1) develop and implement processes to measure the effectiveness of compliance program activities and 2) evaluate and identify institutional resource needs to address program gaps.
- Modifying any of the above program elements as self-assessments, program evaluations, and/or monitoring/auditing results require.
- Set the tone as compliance leaders that supports a culture of compliance at TWU.

¹ <http://www.higheredcompliance.org/matrix/>