



**TEXAS WOMAN'S**  
UNIVERSITY

## **Implementing Compliance at TWU**

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## Implementing Compliance at TWU

The diagrams attached to this handout depict a model of the compliance implementation process at Texas Woman's University. This model is not set in stone and may be modified as we mature. But for now, it is a starting place.

The compliance model has seven activities and one element. These activities/element are based on the section entitled "Effective Compliance Programs" in the U.S. Sentencing Guidelines (FSG). You may ask, 'Why is our process based on this?' Because several years ago this section in the FSG became the standard used when any organization was evaluated for "effective compliance" by a federal agency. Since this was the standard used for evaluation, it became the *de facto* roadmap for implementation.

It is also important to note that this roadmap works on at least two levels. The Office of Compliance will use it for designing the University Compliance Program. This will also be the standard the Office of Compliance uses to evaluate department level programs.

Each step of the compliance implementation process is outlined below in three different diagrams. A table follows that summarizes each step.

Please do not hesitate to ask the Office of Compliance if you have any questions.

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Figure 1: The TWU Compliance Process<sup>1</sup>



*Disclaimer:* This model is provided as guidance only and can be modified to meet your needs. This document does not guarantee prevention of lawsuits, judgments, or fines and is not a substitute for the advice of an attorney. All information is provided without warranty, express, implied, or otherwise, including as to their legal effect and completeness.

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<sup>1</sup> These eight steps were adapted from *Compliance in One Page* ©2015. All Rights Reserved. Used with permission.

**Table 1: Summary of the Eight TWU Compliance Program Steps**

Step	Summary
<b>Assess Risk/Identify Requirements</b>	Effective compliance and ethics programs must be able to identify requirements and evaluate compliance risks. A process must be established to identify all compliance requirements applicable to the organization and to evaluate the risk these compliance requirements pose to the organization's success.
<b>Establish/Modify Compliance Organization</b>	Once compliance risks are identified, compliance responsibility must be assigned to appropriate individuals, committees, functions, coordinators, etc. Executives and managers should have the authority and resources necessary to achieve compliance in their respective areas. Compliance coordinators, partners, or subject-matter experts should also be identified.
<b>Document Standards, Policies, and Procedures</b>	Fundamental to an effective compliance and ethics program are documented standards, policies, and procedures that are produced by those with compliance responsibilities and are based on risks and requirements. This documentation should be accurate, relevant, current, and accessible to all organization employees and agents.
<b>Communicate Standards, Policies, and Procedures</b>	Compliance communication (which includes training) is one of the most significant components of effective compliance and ethics programs. All employees and agents of an organization, from members down to third-party contractors, must know what is required of them via policy and procedure and if necessary, be trained on the specific elements of compliance that affect them.
<b>Implement, Promote, and Enforce</b>	As stated in the Federal Energy Regulatory Commission's Policy Statement on Compliance, "It is not enough to create a good compliance program on paper; the company must carry through to implement the program with effective accountability." This includes promoting and enforcing elements of each program as necessary.
<b>Monitor, Audit, and Report</b>	One of the most powerful components of effective compliance and ethics programs is monitoring. This entails the self-assessment of compliance readiness by the individual operating entity. In addition, an audit function (internal or external) may conduct audits of the overall compliance and ethics program effectiveness or of specific components. In all cases, results need to be reported to appropriate leaders.
<b>Continuous Improvement</b>	Compliance and ethics programs should be designed to provide tools and resources to managers and employees so they can make their operations incrementally better at ensuring achievement of the core values and standards represented by laws and regulations.
<b>Leadership/ Corporate Culture</b>	<p>The FSG states, "The organization's governing authority shall be knowledgeable about the content and operation of the compliance and ethics program" and "an organization shall...promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law." FERC states, "Developing a strong and continuing culture of compliance is a critical task...the responsibility for a culture of compliance rests squarely on the shoulders of senior management."</p> <p>The corporate-level compliance and ethics program should promote a culture of compliance with policies, laws, and regulations is expected as part of the job.</p>