COMPLIANCE PROGRAM ORGANIZATION OVERVIEW

The University of Colorado Colorado Springs' ("UCCS") Compliance Program ("Compliance Program") supports UCCS's fulfillment of its mission as described in state law[1] and achievement of its vision and strategic plan goals as described in the UCCS 2012-2020 Strategic Plan ("Strategic Plan"). The Compliance Program is designed to reflect UCCS' Values of Excellence, particularly the value of integrity, described in the Strategic Plan as follows:

We value integrity and expect ethical behavior from each member of the campus community in all interactions. We build an environment where we treat each other with respect and appreciate each other's contributions.

A Compliance Program guides by the University of Colorado's (University's) [Principles Of Ethical Behavior](). It is intended to: encourage conduct engaged in by members of the UCCS community that is ethical, preserves academic integrity, and enhances the community culture; to help all members of the UCCS community understand and comply with applicable laws, rules, and regulations; to avoid the potential disruptive effect of noncompliance; to support the maintenance of a fair and respectful environment at UCCS; to assist UCCS employees in avoiding conflicts between the performance of their work responsibilities and their personal interests; to promote the responsible stewardship of UCCS resources; and to support the prevention, detection, sanction, and correction of violations of law, regulations, and university policy.

While all members of the UCCS community, including faculty, staff, students, and volunteers contribute to the effectiveness of the Compliance Program and are responsible for its successful implementation, the individuals and committees described below, have specific responsibilities with respect to the Program.

Chancellor

The Chancellor regularly communicates the expectations that UCCS will maintain an ethical culture and that UCCS constituents will conduct themselves in accordance with the University of Colorado Regent Policy 1E:Principles of Ethical Behavior. The Chancellor implements the Compliance Program by: appointing the UCCS Compliance Coordinating Committee; designating a Vice Chancellor or other UCCS officer (without responsibilities that would conflict with the exercise of authority over the Compliance Program) as having primary, executive-level authority for the Compliance Program; appointing a UCCS employee to serve as the Director of Campus Compliance ("Director"); creating a direct line of communication between the Director and the Chancellor; exercising due care in the delegation of substantial discretionary authority, ensuring that resources are provided to support implementation of the Compliance Program.

---

[1] C.R.S. §23-20-101(c) provides: The Colorado Springs campus of the University of Colorado shall be a comprehensive baccalaureate and specialized graduate university with selective admission standards. The Colorado Springs campus shall offer liberal arts and sciences, business, engineering, health sciences, and teacher preparation undergraduate degree programs and a selected number of master's and doctoral degree programs.

Chancellors Leadership Team

The Leadership Team ("LT") includes the Chancellor and the Vice Chancellors. Members of LT conduct themselves in a manner that exemplifies ethical conduct and a commitment to the value of integrity. They support the maintenance of ethical culture at UCCS by their statements and act as liaisons between senior leadership and the UCCS community on compliance-related matters.

Vice Chancellor (or other UCCS Officer) with Designated Authority over the Compliance Program ("Designated Officer")

The Designated Officer is responsible for direct oversight of the compliance program and implementation of the compliance plan.

Compliance Coordination Committee

The Compliance Coordination Committee ("CCC") will be comprised of directors or other managers who have responsibility for departments, divisions and/or programs that have significant compliance risks and requirements, academic administrators, and at least one faculty representative. The CCC oversees compliance activities; facilitates campus-wide implementation of the Compliance Program and monitors its effectiveness. The CCC identifies areas of risk and recommends to LT strategies to address those risks. The CCC assures that there is a process for the regular review of policies and procedures; that policies and procedures addressing compliance issues are effective; that training and education are made available to employees on key compliance issues; that UCCS maintains a mechanism for employees and agents to make reports, including anonymous reports, of suspected violations of laws and regulations and serious or recurring violations of University policies; that UCCS has appropriate safeguards to protect against potential retaliation; that disciplinary systems are consistent and well-publicized; and that UCCS has a process for regular risk assessments. The CCC shall meet four times per year or more frequently at the request of the Chancellor or if the need arises.

Compliance Liaisons

Compliance Liaisons are those individuals who have specific compliance responsibilities in a department, program or other administrative unit. Compliance liaisons assist unit directors or managers in the performance of their compliance responsibilities. The Compliance Liaisons are responsible for bringing issues to the attention of the Compliance Officer and/or the CCC as necessary to ensure that issues are addressed effectively and campus-wide if required. Compliance Liaisons meet monthly, convened by the Compliance Officer, to discuss common compliance issues and provide updates to the Compliance Officer.