Compliance Action Plan: The First Year[1]

A step-by-step summary of tasks that should be completed during the first year of a new compliance program implementation in higher education but could be adapted as needed to other industries. These projects build a basic foundation that can be built on in subsequent years. This list could also be used as a checklist for more mature programs.

1 - Identify Requirements/Risk Assessment (Ch. 5)

Item	What	Who
1A	Adopt the Higher Education Compliance Alliance Matrix as the Federal Compliance Inventory	Compliance Director
1B	Update the Compliance Mgt DB (see 3E) with Most Recent HECE Federal Matrix	Compliance Director
1C	Conduct an Initial Compliance Risk Assessment (with)	Compliance Director and Operational Compliance Committee
1D	Conduct Quarterly Compliance Risk Assessment Updates	Compliance Director and Operational Compliance Committee

2 - Organization (Ch. 6)

Item	What	Who
2A	Use Higher Ed Matrix to Identify Compliance Owners	Compliance Director
2B	Initial Meeting with Compliance Partners, Deans, and Academic Councils	Compliance Director and Identified Personnel
2C	Establish TWU Operational Compliance Committee	Compliance Director, VPs, and Relevant Compliance Partners
2D	Meet with Secondary Compliance Partners	Compliance Director and Identified Personnel

3 - *Document Standards, Policies, Procedures* (Ch. 7)

Item	What	Who
3A	Design and Document the TWU University Compliance Program	Compliance Director
3B	Identify/Update/Create Compliance Policies as Needed	Compliance Director, VPs, and Relevant Compliance Partners
3C	Publish a Compliance and Ethics Guide for Compliance Partners	Compliance Director
3D	Review Whistleblower and Anti-Retaliation Policy	Compliance Director
3E	Compliance Data Management Project	Compliance Director
3F	Begin the Basic Compliance Planning Project (Note: This project will go into the second year.)	Compliance Director and Relevant Compliance Partners

4 - *Communicate/Train* (Ch. 8)

Item	What	Who
4A	Prepare a 10-minute presentation on Compliance for the Board of Regents	Compliance Director
4D	Train Regents in Compliance Governance	Compliance Director
4B	Introduce the new Director of Compliance to Execs via Memo and in person at Cabinet	Appropriate Compliance Leader
4C	If training is not already coordinated, research a Learning/Training Portal for all Compliance-related Trainings (or All training)	Compliance Director and a Task Force
4E	First Annual University Compliance Conference	Compliance Director and staff
4F	Communications and Training Plan for the Office of Compliance	Compliance Director
4G	Article for Compliance Corner	Compliance Director
4H	Update Website with Compliance Section	Compliance Director

5 - *Implement/Promote/Enforce* (Ch. 9)

Item	What	Who
5A	Finalize the Initial Office of Compliance Action Plan	Compliance Director
5B	Execute the Compliance Action Plan	Compliance Director
5C	Conduct a Compliance and Ethics Week (Preferably in November)	Compliance Director

6 - *Monitor/Audit/Report* (Ch. 10)

Item	What	Who
6A	If Needed, Conduct Hotline Provider Research and Implement a Hotline	Compliance Director and a Task Force
6B	Develop Basic Investigation Process, Materials, and Training (use a task force)	Compliance Director and a Task Force
6C	Monitor the Hotline and Manage Cases	Compliance Director
6E	Conduct Compliance Reviews, as needed	Compliance Director

7 – *Continuous Improvement* (Ch. 11)

Item	What	Who
7A	Complete all necessary professional development to maintain all compliance-related certifications	Compliance Director
7B	Make changes to this plan, the compliance program, the guide, the assessments, etc. as needed and as identified.	Compliance Director

8 – *Leadership/Culture* (Ch. 12)

Item	What	Who
8A	Develop a plan to communicate and promote leadership and compliance to Regents and Cabinet and implement the plan.	Compliance Director and Supervisor
8B	Implement the above plan.	Compliance Director and Supervisor

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[1] Based on *Compliance in One Page*, © 2015. Used with Permission. All Rights Reserved.
[2] Ibid.