

OREGON STATE UNIVERSITY
OFFICE OF UNIVERSITY COMPLIANCE
CHARTER

Purpose

The purpose of the Oregon State University (“University”) Office of University Compliance (“OUC”) is to promote and maintain an organizational culture which supports the University’s commitment to maintain the highest level of integrity and ethical standards in the conduct of its operations. To this end, OUC will undertake activities designed to promote and maintain the University’s culture of respect and honesty, and build ethics consciousness into the daily activities of its faculty and staff while maintaining compliance with the law.

Authority

The Chief Compliance Officer (“CCO”) reports administratively to the Executive Vice President and Provost, and functionally to the Compliance Executive Committee (“CEC”). The CEC provides oversight and direction to the OUC. Subject to oversight by the CEC, and acknowledging the importance of confidentiality and the safekeeping of sensitive information, OUC is authorized to access all University records, property, personnel, and activities necessary to fulfill its responsibilities. The scope of OUC activities is subject to review by the CEC, but is otherwise unrestricted. OUC acts in a management advisory capacity.

Goal and Objectives

OUC shall undertake activities designed to help the University’s employees perform their duties as efficiently as possible while conducting themselves ethically, with the highest integrity, and in compliance with all applicable laws, regulations, and policies. OUC shall implement its programs under a risk based process that reasonably satisfies the requirements of the *U.S. Sentencing Commission’s Guidelines for Organizations* for an effective compliance and ethics program, and complies with all applicable laws, regulations and policies of Oregon State University.

OUC Activities

OUC will provide advice and services in six primary areas:

- (1) risk assessment – perform an annual risk assessment of the compliance risks facing the university and present that assessment to the CEC for review and approval;
- (2) policy management – develop and maintain a program intended to manage the lifecycle of policies having general applicability to the university as proposed and advanced by management;
- (3) training and general education – help faculty and staff identify and understand relevant legal, regulatory and policy constraints, emphasizing the personal responsibility of all employees to eliminate misconduct and other wrongdoing and to conduct University business in an ethical and legal manner;
- (4) operational support – help faculty and staff having management responsibilities develop and implement practical strategies to avoid compliance and ethics failures using risk-based and other appropriate methodologies;
- (5) effort coordination – serve as a liaison between and among employees of the various University divisions having compliance responsibilities and executive management to improve OUC related activities; and,
- (6) monitoring – review processes and actions, implemented by management, intended to mitigate identified compliance risks and inform the CEC of their effectiveness.

OUC will conduct such other activity as reasonably calculated to achieve the goals and objectives of the OSU Compliance and Ethics Program.

OUC Partners

The CEC is composed of the Executive Vice President and Provost of the University, as chair, and those members of the University’s faculty and staff serving as provided for in the CEC Charter. The CEC shall be responsible for the oversight of the OUC and shall have the duties and responsibilities set out in the CEC Charter.

The Compliance Partner’s Network (“CPN”) is comprised of faculty and staff having compliance related job responsibilities and duties and appointed to the CPN by the CCO. CPN members will discuss and advise the CCO on operational issues related to OUC design, risk assessment, and other issues pertinent to compliance related issues.

The Designated Responsible Person (“DRP”) is that individual designated by the CEC as being responsible for management of each risk specified in risk assessments of the University. Each DRP shall have the knowledge and authority necessary to manage that risk and shall cooperate with the OUC to develop a risk management process which includes training, monitoring and reporting plans for each risk. Even though the DRP may have delegated the actual management duties to a subordinate, the DRP shall continue to be responsible to the CEC for the performance of these obligations.

OUC Standards

The OUC shall conduct its activities recognizing that building and maintaining a culture of compliance, ethics and integrity are shared responsibilities and require individual commitments from all University faculty and staff. University employees are expected to conduct their activities to the standards set out in the policies and standards and in keeping with the University Code of Ethics. The policies and standards provide the framework within which all employees are expected to operate and apply to all University employees, including administration, faculty, staff, and students. Moreover, many of the policies and standards are applicable to University subcontractors, independent contractors, consultants and vendors.