



UNIVERSITY
of ALASKA
Many Traditions One Alaska

Implementing Effective Compliance Programs

Guidance and Tools for Compliance Leaders in
the University of Alaska System

November 2025



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Compliance Programs in the University of Alaska System

Higher education is one of the most regulated industries in the U.S., subject to oversight from federal and state agencies, the NCAA, accreditation bodies, and may include international regulators. To help navigate this complex environment, the University of Alaska System maintains a dedicated Institutional Compliance Program within the Office of Audit and Compliance Services.

This guidance document is designed to assist university leaders with compliance responsibilities in the design, implementation, and evaluation of effective compliance programs.

UA's Compliance Framework

The University of Alaska's Institutional Compliance Framework provides a coordinated, system-wide approach to compliance across all campuses and departments. It ensures that compliance perspectives are embedded in decision-making and that programs are regularly assessed against federal and professional best practices.

This framework promotes consistency, ethical conduct, accountability, and transparency. It also helps departments align their efforts with federal expectations for effective compliance programs.

Key principles include:

- **Ethical Conduct:** UA employees follow the Executive Branch Ethics Act and UA policies.
- **Shared Responsibility:** Compliance is a collective effort across departments.
- **Leadership Accountability:** Chancellors oversee campus compliance; the President provides systemwide oversight.
- **Reporting:** Concerns can be reported via supervisors or the UA Confidential Hotline: 1-855-251-5719 or alaska.ethicspoint.com.

Resources and Support

The Office of Audit and Compliance Services offers:

- Training and educational resources
- Compliance Chats
- Compliance risk assessment tools
- Guidance on effective compliance practices

For questions or support, please don't hesitate to contact Institutional Compliance.

Mary Gower
Senior Institutional Compliance Liaison
ua-compliance@alaska.edu

Compliance Leader Roles and Responsibilities

Compliance with federal, state, and local laws, as well as University policies, is the responsibility of all faculty, staff, students, and guests across the University of Alaska System. Certain employees have additional compliance responsibilities due to specific regulations that govern their departments. These personnel will be referred to as **compliance leaders**. Together, these leaders make up the informal, but important, UA compliance network that underpins the integrity and accountability of the University of Alaska System.

Compliance leaders are the primary contact for compliance program activities in each area (or partial area) as defined by the Higher Education Compliance Alliance “Topics” (see list on page 7). A compliance leader may be a staff member, manager, director, or senior-level member of university leadership, depending on the area’s scope. Ideally, the responsibilities outlined below should become a part of the compliance leader’s work plan or list of assigned duties.

Compliance Priorities

Compliance leaders should work to identify and evaluate compliance priorities to effectively align resources with risks and operational needs.

Compliance Plans and Assessments

Compliance leaders—working collaboratively with others as needed—are encouraged to develop a basic compliance plan guided by the “Seven Elements of an Effective Compliance Program.” This plan should include a process for conducting a compliance risk assessment.

The System Office Compliance function is available to advise university leaders and departments throughout the planning process, offering guidance and support as they build their own plans. In addition, the System Office can assist with periodic compliance program self-assessments, helping departments evaluate and enhance their compliance efforts.

Compliance Goals

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

Compliance Reporting

Compliance leaders are responsible for reporting significant compliance concerns and activities to their manager, executive university leadership, and, if needed, General Counsel. When a compliance event occurs, compliance leaders are also responsible for self-reporting to governing agencies as required by relevant regulations. Leaders should coordinate such reports with the General Counsel and Institutional Compliance.

All members of the University of Alaska community—faculty, staff, students, and guests—have a responsibility to report concerns related to noncompliance, fraud, discrimination, or safety. Reports may be made directly to supervisors, university leadership, or anonymously through the **UA Confidential Hotline**: Phone: 1-855-251-5719 Online: alaska.ethicspoint.com

UA policy prohibits retaliation against individuals who report concerns in good faith. This protection is reinforced by the Alaska Whistleblower Act. Compliance leaders should ensure their teams are aware of these reporting options and protections.

Compliance Program Activities

Compliance leaders are responsible for coordinating or supporting the coordination of compliance program activities within their departments. These activities are designed to promote a culture of integrity, ensure adherence to laws and policies, and proactively manage institutional risk.

- **Establish a Culture of Compliance**
 - Set the tone for ethical conduct and accountability.
 - Promote awareness of compliance expectations across teams and departments.
- **Define Roles and Responsibilities**
 - Clarify who is responsible for specific compliance obligations.
 - Ensure appropriate oversight structures are in place.
- **Identify and Stay Current on Requirements**
 - Maintain an up-to-date understanding of applicable laws, regulations, and policies.
 - Use professional resources and networks to monitor changes.
- **Conduct Risk Assessments**
 - Regularly assess compliance risks to prioritize high-risk areas.
 - Use assessment results to guide resource allocation and planning.
- **Engage Leadership - Supervisors and university executives play a critical role in supporting compliance efforts by:**
 - Monitoring compliance activities within their units.
 - Ensuring staff complete required training.
 - Reporting significant concerns to appropriate offices.
 - Supporting investigations and remediation efforts.
- **Develop and Maintain Standards**
 - Evaluate, update, and document compliance-related policies and procedures.
 - Ensure standards are accessible and relevant to operational needs.
- **Communicate and Train**
 - Provide targeted training and communication to employees and partner departments.
 - Promote compliance awareness through meetings, materials, and onboarding.
- **Monitor, Audit, and Report**
 - Track compliance status and report findings to senior leadership, General Counsel, and the System Office.
 - Conduct internal audits and respond to external audit findings.
- **Investigate and Remediate**
 - Investigate reported compliance issues.
 - Enforce policies and implement corrective actions when violations are substantiated.
- **Evaluate and Improve**
 - Periodically assess the effectiveness of the compliance program.
 - Collaborate with the System Office to identify gaps and improve processes.
 - Modify program elements in response to evaluation findings, audit outcomes, or monitoring insights.
- **Implement and Sustain**
 - Ensure all compliance activities are implemented as planned.
 - Maintain documentation and follow through on action items.

The Compliance Formula

Although compliance may appear to be simply about “following the rules,” many of these rules can be complex and nuanced. A basic formula can help simplify some of the complexity.

Effective compliance programs can be reduced to the following formula:

WHY + WHAT + HOW = EFFECTIVE COMPLIANCE

Why

Why compliance? Compliance programs ensure an organization adheres to hundreds of laws, regulations, and internal policies. These legal and ethical standards span across critical operational areas, including:

- Reputation management
- Infrastructure and facilities
- Legal liability and litigation
- Health and Safety protocols
- Data protection and privacy
- Financial integrity and sustainability

The “why” of compliance is to safeguard the organization’s reputation, protect its physical and digital assets, ensure the well-being of employees and stakeholders, and reduce exposure to legal and financial risks. A strong compliance culture fosters accountability, builds public trust, and supports long-term organizational success.

What

The previously mentioned “hundreds of laws and regulations” comprise the “what” of compliance including laws, regulations, and rules, such as HIPAA, ADA, FERPA, NCAA, OSHA, Title IX, Clery Act, False Claims Act, etc.

Following the list of compliance areas provided by the Higher Education Compliance Alliance (HECA) is key. See the next page for key areas.

How

“Effective compliance” is not complete without understanding the “how.” The “how” is shaped by guidance from various federal agencies and other professional guidance, including:

- U.S. Sentencing Guidelines (FSG) section §8B2.1— Standards for Effective Compliance and Ethics Programs
- U.S. Department of Justice (DOJ)— Evaluation of Corporate Compliance Programs,
- U.S. Department of Health and Human Services Office of the Inspector General (HHS/OIG)— General Compliance Guidance
- Committee of Sponsoring Organizations of the Treadway Commission (COSO)—Internal Control – Integrated Framework Principles.

Each of these sources outlines key activities and structural elements that must be in place for a compliance program to be deemed effective. While the specific requirements may vary depending on the guidance consulted, they consistently emphasize proactive risk management, accountability, and continuous improvement.

Federal Compliance in Higher Education per the Higher Education Compliance Alliance (HECA)

- Number of Total Regulatory Areas of Compliance 37
- Number of Total Regulatory Summaries 294*
 - There is some duplication because some laws cover multiple areas

Higher Education Federal Compliance Areas

- ☐ Academic Programs
- ☐ Health Care & Insurance
- ☐ Accounting
- ☐ Accreditation
- ☐ Admissions
- ☐ Athletics
- ☐ Auxiliary Services
- ☐ Campus Safety
- ☐ Contracts & Procurement Copyright & Trademark Disabilities
- ☐ Discrimination
- ☐ Employee Benefits
- ☐ Environmental Health & Safety Ethics
- ☐ Export Controls
- ☐ Financial Aid
- ☐ Fundraising & Development Governance
- ☐ Grants Management
- ☐ Housing
- ☐ Human Resources
- ☐ Immigration
- ☐ Information Technology
- ☐ Intellectual Property & Technology Transfer
- ☐ International Activities & Programs
- ☐ Lobbying and Political Activities
- ☐ Privacy & Information Security Program Integrity Rules
- ☐ Recruitment Hiring & Termination
- ☐ Research
- ☐ Retirement
- ☐ Sexual Misconduct
- ☐ Tax
- ☐ Unions
- ☐ Wages

See the full list at <http://www.higheredcompliance.org/matrix/>

The University of Alaska Compliance Model

Prevent



Existence of policies, procedures, and standards of conduct. The cornerstone of a compliance program is ensuring that behavior and decision-making expectations are articulated, clearly communicated and that practical guidance is available and accessible. Actively follow and support current standards and procedures to prevent and detect criminal conduct and facilitate compliance. All UA employees, full or part-time, are subject to the Executive Branch Ethics Act (EBEA) and its implementing regulations published by the Department of Law.



Designating responsibility for compliance. The Board of Regents and senior leadership will be knowledgeable about the content and operation of the university's compliance program. Leaders at all levels will demonstrate a strong commitment to compliant business, research and academic operations at the university. Successfully compliant and ethical university operations depend on the individual commitment of every university community member. As compliance requirements permeate all university programs, institutional compliance depends on a unique level of personal accountability and responsibility at all levels of the university.



Existence of and requirements for training and education. Provide appropriate, relevant, and comprehensive education and outreach about compliance requirements. Each institution and appropriate department should take reasonable steps to periodically communicate its standards and procedures by conducting effective training programs and otherwise disseminating information appropriate to individual roles and responsibilities.



Maintaining lines of communication. University leadership will facilitate and support communication at each university about the university's compliance program, its purpose and their responsibilities so that UA community members understand and can also fulfill their compliance duties. Reasonable steps will be taken to communicate standards, procedures and roles to members of the institution, including the Board of Regents, to foster a compliance consciousness. Employees are encouraged to report any concerns and or seek guidance regarding potential or actual misconduct without fear of retaliation.

Find and Fix



Methods for internal risk assessment, monitoring and auditing. Continuous monitoring is done by departmental managers to detect their unit's compliance risk issues and compliance requirement adherence associated with the university's operations. Reasonable steps will be taken to conduct compliance risk assessments to determine how well UA's business processes fulfill current policies.



Methods for enforcement of policies, procedures, and standards. Ensure there are clear avenues to seek guidance or report violations of policy and relevant laws/regulations. The university will follow appropriate processes, conduct investigations, enforce standards and emphasize non-retaliation.



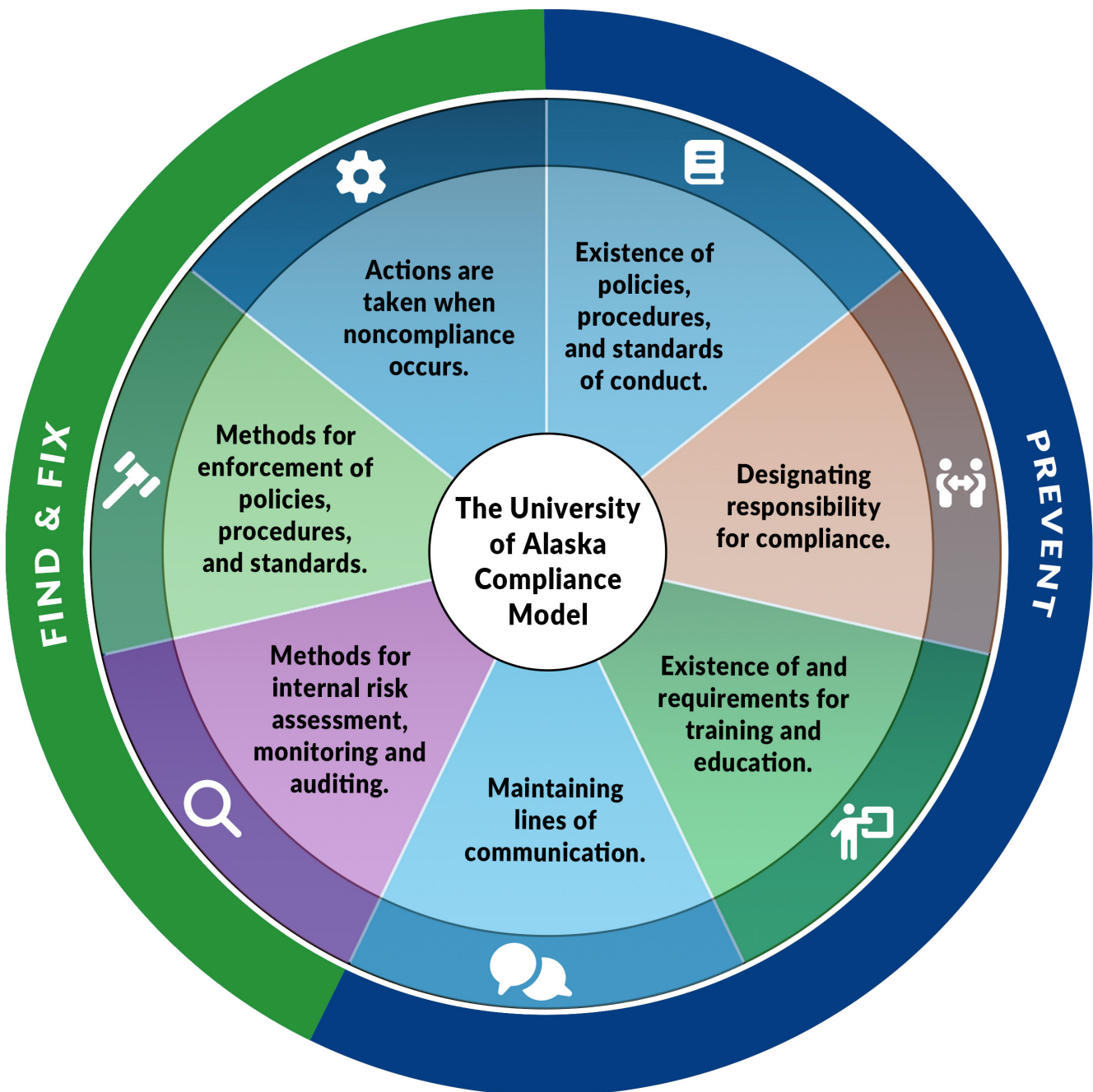
Actions are taken when noncompliance occurs. The university responds appropriately to investigate and address episodes of misconduct and violations of laws, regulations and policies. Steps are taken to prevent further similar conduct from occurring in the future.

Prevent, Find, and Fix: The Primary Purpose of Compliance Programs

All UA employees must actively follow and support current standards and procedures to prevent and detect criminal conduct and facilitate compliance.

These activities are divided into three categories: prevent, find, and fix. This is because the primary purpose of compliance programs is to:

1. Prevent compliance issues from occurring in the first place,
2. Find compliance issues when they do occur, and
3. When found, fix issues quickly and effectively.



Summary of the Seven Compliance Program Activities/Elements

Prevent, Find, and Fix

Activity/ Element	Potential Resources and Partners	Summary of the Seven Compliance Program Activities/Elements
Prevent		
Designating responsibility for compliance.	• Your Board Liaison • President/Chancellor • University Executive(s) • Ethics/General Counsel • Audit and Compliance Services • Human Resources	• Federal guidelines emphasize that leadership is responsible for fostering a culture of ethics and compliance across the institution. • UA leaders are expected to model ethical behavior and ensure compliance is treated as a core institutional value through active oversight and engagement. • Compliance leaders are expected to help identify compliance requirements and assess risk. • Proactive compliance risk assessment is essential for effective governance and long-term stability. • Once risks are identified, responsibility must be assigned to qualified individuals or teams with clear roles and authority to manage compliance in specific regulatory areas. • An effective structure with empowered compliance leads ensures daily operations are well-supported, resourced, and aligned with institutional standards.
Existence of policies, procedures, and standards of conduct.	• Policy committees	• Effective compliance programs require documented standards, policies, and procedures. • These must be created by compliance leads, based on identified risks and requirements. • Documentation should be accurate, current, and easily accessible to all employees and agents.
Existence of and requirements for training and education.	• Human Resources • Audit and Compliance Services	• Training is essential to effective compliance programs. • All employees and agents must understand their responsibilities through clear policies and, when needed, targeted training. • Promoting compliance through consistent messaging helps build a strong, unified organizational culture.

Summary of the Seven Compliance Program Activities/Elements

Prevent, Find, and Fix

Activity/ Element	Potential Resources and Partners	Summary of the Seven Compliance Program Activities/Elements
Maintaining Lines of Communication	• University Leadership • Audit and Compliance Services	• Open and transparent conversation and mutual trust is key to a compliance positive environment. • Ensure employees understand policy and reporting guidelines.
Find and Fix		
Methods for internal risk assessment, monitoring and auditing.	• Audit and Compliance Services	• Ongoing monitoring is essential to assess compliance readiness. • Internal or external audits should evaluate both overall program effectiveness and specific regulatory areas. • Results must be reported to appropriate leadership to ensure accountability and continuous improvement.
Methods for enforcement of policies, procedures, and standards. (Investigations)	• Audit and Compliance Services	• Significant compliance incidents must be thoroughly investigated to identify root causes and assess risks. • Transparent, accurate reporting supports informed decision-making and effective resolution. • Investigations strengthen accountability and improve future compliance outcomes.
Actions are taken when noncompliance occurs (consistently and commensurate with the noncompliance).	• Human Resources • General Counsel	• Enforcement ensures accountability and gives real weight to compliance policies. • Consistent consequences for non-compliance reinforce ethical behavior. • Remediation, when necessary, strengthens the integrity and effectiveness of the compliance program.

While these seven elements form the foundation of an effective compliance and ethics program, their true impact depends on regular reflection and refinement. Ongoing evaluation helps identify emerging risks and improve processes, ensuring the program remains resilient, responsive, and aligned with institutional values.

Supporting a Culture of Compliance: A Flexible Framework for Departments and Campuses

Every department and university within the University of Alaska system operates with unique responsibilities, challenges, and cultures. There is no one-size-fits-all approach to compliance. Instead, this list offers a flexible collection of best practices designed to help units strengthen their compliance efforts in ways that fit their specific needs. These ideas support the shared goal of promoting ethical behavior, reducing risk, and ensuring alignment with laws, policies, and institutional values.

Prevent, Find, and Fix

- ☐ Ensure compliance is consistently included in broader departmental updates — such as business operations, student services, or research — so it remains visible and valued in leadership conversations.
- ☐ Use regular reporting moments to reinforce that compliance is part of the holistic picture, not a separate or reactive concern.
- ☐ Introduce “ethics moments” in team meetings — short, practical questions or scenarios that prompt reflection and discussion on ethical decision-making.
- ☐ Integrate compliance messaging into departmental communications and adjust strategies as needed to strengthen engagement and accountability.

Prevent

- ☐ Attend a professional conference annually, including compliance sessions on regulatory updates and emerging risks.
- ☐ Subscribe to updates from professional organizations to stay informed about changes in laws and regulations.
- ☐ Maintain a current list or spreadsheet of all laws and regulations relevant to your area.
- ☐ Conduct annual risk assessments with staff to identify high-risk compliance areas and develop mitigation plans.
- ☐ Regularly meet with direct reports to identify, review, and prioritize compliance risks and ensure monitoring of regulatory changes.
- ☐ Establish or update a compliance organization chart, assigning clear roles and responsibilities for each regulatory area.
- ☐ Review and revise compliance roles and structures annually or as regulations change.
- ☐ Collaborate with legal and compliance offices to create or update policies and procedures based on new or changing requirements.
- ☐ Require new employees to complete compliance training before starting work, which can include industry-specific modules offered by your professional organizations. You can deliver this training directly, and provide annual refreshers while maintaining detailed training logs.
- ☐ Ensure all team members complete required compliance education and training appropriate to their roles.

- ☐ Use visual reminders like posters and “cheat sheets” to reinforce compliance expectations in high-traffic or high-risk areas.
- ☐ Promote compliance at staff and leadership meetings, including at least 2–3 “all hands” sessions per year.
- ☐ Share compliance information with colleagues and direct reports.
- ☐ Ensure direct reports coordinate activities with university-wide compliance managers.

Find and Fix

- ☐ Monitor sensitive compliance areas regularly (daily, weekly, or monthly as needed), and adjust processes based on findings.
- ☐ Conduct annual self-audits to identify gaps and implement corrective actions.
- ☐ Cooperate fully with internal audits and implement reasonable recommendations from audit reports.
- ☐ Incorporate compliance status reports into regular business operations updates to executive leadership to ensure ongoing transparency and accountability.
- ☐ Self-report compliance failures to external agencies when required, in consultation with leadership and legal counsel.
- ☐ Investigate reported or discovered violations using university procedures, ensuring thorough documentation and appropriate follow-up.
- ☐ Enforce policies consistently, applying discipline per university guidelines when violations are substantiated.
- ☐ Remediate issues as needed to prevent recurrence and strengthen compliance practices.
- ☐ Promote awareness of the UA Hotline as an anonymous reporting tool.
- ☐ Proactively monitor the effectiveness of compliance activities, including results and key issues.
- ☐ Every few years, conduct a formal self-assessment of the compliance program to evaluate effectiveness and identify areas for improvement.
- ☐ Use findings from investigations, audits, and reviews to update policies, procedures, training, and communication – fostering a culture of continuous improvement.

Additional Helpful Questions to Consider:

- Are you and your team up to date on the federal and state laws, regulations, and contractual requirements applicable to your department?
- How are you mitigating risks?
- How do you monitor and stay updated on changes in relevant laws and regulations?
- Are you and your team up to date on compliance-related training and the Compliance Chats?
- How do you ensure that your team members are bringing compliance concerns to your attention?

Helpful Tools

Use the following templates and handouts to help implement your department Compliance Program.

Questions? Contact Mary Gower, Senior Institutional Compliance Liaison, ua-compliance@alaska.edu

Purpose: What is the purpose of your department's compliance efforts?

Briefly describe how these efforts support UA's mission and promote ethical, responsible operations.

Background: Why are these compliance efforts in place or being updated?

[Include relevant laws, regulations, risks, or institutional needs.]

Compliance Details**Compliance Area:**

[e.g., Athletics, Research, Data Privacy]

Topic or Focus:

[Brief description of what's being addressed]

Start Date: _____

Next Review Date: _____

Responsible VC/Chancellor: _____

Department Lead for Compliance: _____

Key Contacts: _____

Collaborating Offices: _____

Legal and Policy Framework

Federal Requirements: [List key laws or regulations] _____

State Requirements: [List key laws or regulations] _____

UA Policies / Board of Regents Policies: [List relevant policies] _____

Oversight Agency or Entity: [e.g., DOE, OSHA, NCAA] _____

Main Compliance Responsibilities

What does your department need to do to stay compliant?

[List required actions such as training, reporting, documentation, etc.]

Risks to UA

What could happen if compliance is not maintained?

[e.g., Financial penalties, reputational harm, legal issues]

Other Units Affected: [List offices that share responsibilities or are impacted]

Reporting to Executive Leadership

How does your department keep leadership informed?

Reporting Frequency: [e.g., Monthly, Quarterly] _____

Report Format:[e.g., Memo, Dashboard, Verbal update] _____

Who Reports: _____

Topics Covered: [e.g., Training, audits, risks] _____

Delivery Method: _____

Last Report Date: _____

Next Report Date: _____

UA's Seven Elements of an Effective Compliance Program

Briefly describe how your department supports each element.

Existence of Policies, Procedures, and Standards of Conduct

Designating Responsibility for Compliance

Existence of and Requirements for Training and Education

Maintaining Lines of Communication

Methods for Internal Risk Assessment, Monitoring, and Auditing

Methods for Enforcement of Policies, Procedures, and Standards

Actions Are Taken When Noncompliance Occurs (Consistently and Commensurate with the Noncompliance)

Review and Updates

Last Review Date: _____

Next Scheduled Review: _____

Recent Updates or Findings: [Brief summary]

Attachments and Notes

List or link any related documents (e.g., policies, training logs, risk assessments).

10 TIPS FOR Common Sense Compliance



01. Cybersecurity Vigilance

Stay alert to cyber threats, avoid opening suspicious attachments, and report suspicious emails and attachments to your university's information technology office.

Promptly report compliance violations, security breaches, or other concerns to your supervisor, university leadership or use the confidential UA Hotline.

02. Incident Reporting



03. Compliance Training

Participate in compliance training programs offered by the university such as ethics and data security, among others, to remain up to date on standards and best practices.

Only grant access to data, systems and documents to individuals who require it, and remove access when done. Adhere to the Family Educational Rights and Privacy Act and Gramm-Leach Bliley Act.

04. Data Privacy and Security



05. Financial Stewardship

Adhere to financial regulations, safeguard university property, and responsibly manage university funds within budgetary constraints.

Maintain supporting documentation for financial, academic, research and compliance purposes as well as improving operational effectiveness and efficiency.

06. Keep Good Documentation



07. Ethical Research Practices

Abide by ethical research guidelines, maintain research integrity, and document findings accurately to prevent research misconduct.

Treat others with respect, and adhere to equal opportunity and Title IX policies. Promptly report any incidents of discrimination, harassment, or assault to university management.

08. Respect Others Promote Equity



09. Transparency Conflict of Interest

Disclose potential conflicts of interest, whether personal or financial, to ensure transparency and prevent conflicts from affecting compliance.

Keep updated on industry-specific compliance standards and best practices through conferences, workshops, and training sessions relevant to your field of expertise.

10. Professional Development



CLEAR

UA ETHICAL DECISION-MAKING FRAMEWORK

C



CODE & COMPLIANCE

Does this action follow our policies, Executive Branch Ethics Act, and the law? Check relevant university policies and laws. When in doubt, ask.

L



LEGACY

Would I feel good if this decision ended up in the news? Consider how your decision reflects on your department, leadership, and the institution as a whole.

E



EVERYONE AFFECTED

How does this impact students, colleagues, and the community? Think beyond yourself. Would others see this as fair and ethical?

A



ALTERNATIVES

Have I considered other options, and why is this the best one? Good decisions often come from weighing a few paths, not just reacting.

R



REPORT OR REFLECT

Do I need to report this or ask for help?
If something feels off, it's okay to pause, ask a supervisor, or contact the UA Confidential Hotline.

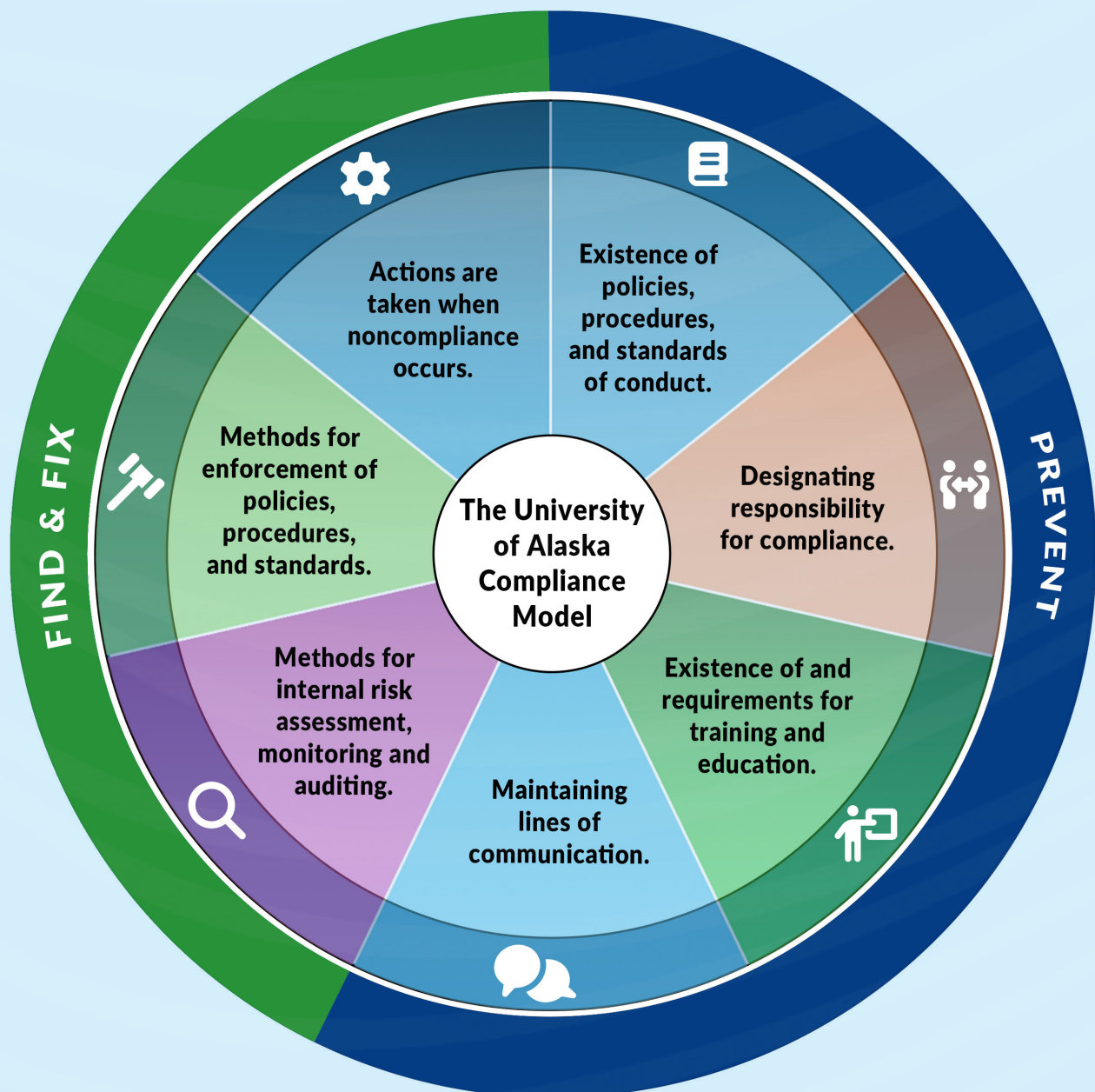


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UA INSTITUTIONAL COMPLIANCE PROGRAM
WWW.ALASKA.EDU/COMPLIANCE



Prevent, Find, and Fix: The Primary Purpose of Compliance Programs



alaska.edu/compliance