Health Center Wins First Annual Compliance Challenge

And the winner is... the Owens-Franklin Health Center!

Ms. Thelma Pierre, Administrator of Health Services and her staff emerged victorious in PVAMU’s first Compliance Champion Challenge. The winner of the challenge had to demonstrate compliance in monthly account reviews and development of departmental procedures. In addition, all employees in the department had to be current on the five System-required trainings in TrainTraq. To earn additional points for their department, a Health Center staff member attended all nine of the training sessions offered during the week-long event.

Second place went to the Office of Disability Services (Dr. Kay Norman) and third place went to Auxiliary Services (Ms. Victoria “Pappy” Gieseke). The University Compliance Office also recognized the first department to sign up to compete in the challenge and the individual who attended the most trainings. These awards went to Ms. Gieseke and Dr. Terence Finley, respectively.

The goal of Compliance Week 2014 was to heighten the University’s awareness of the importance of compliance through a “meet-and-greet” on March 17th and free, on-campus training opportunities, which were offered Tuesday, March 18th through Thursday, March 20th. Training topics included student travel, athletic boosters, ethics, fraud, waste and abuse. The capstone of the week was the Compliance Awards on March 21st, which featured guest speaker Dr. Jairy Hunter, Jr., President of Charleston Southern University located in North Charleston, South Carolina.

You may leave your feedback about Compliance Week by completing the feedback survey located on the University Compliance Office’s website. The survey closes April 30, 2014.
Policy Spotlight: PVAMU Rule 33.99.08.P1 Student Employment

PVAMU established Rule 33.99.08.P1 Student Employment to oversee the University’s process for student employment. Per the Rule, students may obtain paid employment as work-study employees, student hourly employees or graduate assistants. In order to be in compliance with work-study requirements, students may not work more than 20 hours per week during a regular semester. Student hourly employees may not work over 20 hours each week, and non-teaching graduate assistants may not work more than 25 hours per week while completing their graduate coursework. Similarly, graduate assistants with F-1 visas may not work more than 20 hours each week while completing their graduate coursework.

Questions related to this rule may be directed to the Office of Human Resources at 936.261.1730.

Compliance Makes a Difference

Every organization, its programs, and workforce have standards to meet. The definition of a standard according to Webster.com is: “a level of quality, achievement, etc. that is considered acceptable or desirable; something that is very good and is used to make judgments about the quality of other things; something set up and established by authority as a rule for the measure of quantity, weight, extent, value or quality.” There are also standards for compliance and ethics (continued on pg. 3)
programs. If those standards are met, it can make a tremendous difference.

The standards established for the structure of an effective compliance program are outlined in The 2011 Federal Sentencing Guidelines (FSG) Manual, Chapter Eight for Effective Compliance and Ethics Programs. Each of the elements defined in the FSG has measurements associated with it. The guidelines and measurements help judges to determine how well the compliance and ethics element/standard was met, or not met, and what the consequence will be. Although the elements are often referred to as the “seven elements of a compliance program,” for the sake of this discussion, the elements are broken down further to highlight each aspect addressed in the FSG.

- **Governance and high-level oversight** refers to the board of directors receiving reports about compliance program activities. The directors must demonstrate knowledge and oversight of the program. A high-level person (a compliance officer who has proper authority and reporting responsibilities) is designated to oversee the compliance program.

- **Establish standards** refers to maintaining and publishing policies, procedures, and a code of conduct that address the risks of doing business and the expectations for the conduct of the workforce.

- **Create a fair and ethical culture** refers to establishing incentives tied to performance for the workforce, including leadership, to help create a tone where “doing the right thing” is evaluated and rewarded.

- **Open lines of communications** refers to establishing a confidential reporting line/hotline for misconduct and surveying the workforce for feedback.

- **Education and training** refers to conducting training programs that cover regulatory (continued on pg. 4)

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**SELF-MOTIVATION**

“Start where you are. Use what you have. Do what you can.”

—Arthur Ashe
Compliance Makes a Difference (continued from page 3)

requirements, the roles of the workforce, and areas of risk.

- **Detection, remediation, and enforcement** refers to screening employees to ensure they have not been involved in criminal activity, establishing sanctions for non-compliance with organizational standards and the law, taking immediate action to address misconduct, and making corrective actions to prevent recurrence.

- **Risk assessment** refers to finding and evaluating operational and organizational risks and taking steps to minimize those risk areas.

- **Auditing & Monitoring** refers to ongoing testing of the controls established to minimize risks and ensure the controls are working.

- **Assessment of effectiveness** refers to evaluating the compliance program elements and how well they are being met.

Meeting the operational day-to-day responsibilities and standards and meeting the compliance and ethics program standards are related. To implement an effective compliance program, it’s important that the leadership, the general workforce, and the compliance officer collaborate to properly identify and evaluate risks and lessen or eliminate the risks through well-designed internal controls.

An effective and mature compliance program will be established when everyone works together as a TEAM (Together Everyone Accomplishes More). That’s how compliance makes a difference.

Deann M. Baker, CCEP, CHC, CHRC
Managing Director
Compliance Advisor Specialists, LLC

University Compliance Office Contacts:

Lydia Cavanaugh, CCEP, Director
lacavanaugh@pvamu.edu
936.261.2155

Alexia Taylor, CCEP
Sr. Compliance Officer
altaylor@pvamu.edu
936.261.2118

Jacqueline Stone, CCEP
Compliance Officer
jastone@pvamu.edu
936.261.2116

Craig Nunn
Compliance Officer
clnunn@pvamu.edu
936.261.2117

Janet Smalley, System Ethics & Compliance Officer
janetsmalley@tamus.edu
979.458.6008
Compliance
Ethics
Export Controls
FERPA
HIPAA

Compliance Wordseek

Word Bank

Compliance
Ethics
Export Controls
FERPA
HIPAA

Hotline
Procard
Procedures
SOCIAL
TAMUS