University Compliance is based upon a closed “loop” that is designed to achieve continuous improvement. The three stages within the loop are:

**ASSESS & INVENTORY**
- Assess the “here and now” as defined by the University’s current state.
- Determine the “there and later” as defined by “best practices.”
- Complete a “Gap Analysis”; develop an “Action Plan” to “bridge the gap.”
- Determine “Risk”; prioritize and develop managerial controls to alleviate.
- Document the above in a Compliance Inventory; this forms the nucleus of the program.

**COMMUNICATE & TRAIN**
- Communicate the requirements on the Compliance Inventory to all stakeholders.
- Communicate specific job requirements to individual employees.
- Provide training to all employees on University philosophy, requirements and reporting.
- Train and qualify internal auditors and investigators.

**AUDIT & CORRECT**
- Audit the Compliance Inventory and the managerial controls.
- Investigate reported, alleged, instances of non-compliance.
- Document Findings for the Board Audit Committee (for Executive Committee follow-up).
- Require and assess Corrective Actions on all Findings.