

Duke University Compliance Program Accountability and Assurance

Approved and issued by the President on March 20, 2017

Duke University is committed to operating at the highest level of integrity, accountability and ethical conduct, which includes supporting programs and positions that promote compliance with applicable laws, regulations and policies.

The President designates the Executive Vice President (EVP) as the compliance risk owner and the Executive Director of Audit, Risk and Compliance (Chief Compliance Officer - CCO) as the compliance assurance owner. Together, the EVP and CCO are responsible for coordinating, overseeing and assessing the effectiveness of the university-wide compliance program.

Duke University maintains a federated organization structure for its compliance programs and demonstrates institutional oversight through the EVP, CCO and designated compliance liaisons. The EVP delegates particular institutional responsibilities to area-specific compliance officers and they are directly responsible to the respective operational area senior leaders.

Duke University Health System coding, billing and privacy compliance	Chancellor DUHS Chief Compliance and Privacy Officer
National Collegiate Athletics Association compliance	Vice President and Director of Athletics Athletics Compliance Officer
Research	Chancellor Provost
Campus safety compliance	Vice President for Administration
Title IX compliance	Vice President for Institutional Equity
Local, state and national employment practice compliance	Vice President for Administration
Occupational and environmental safety compliance	Executive Vice President for Clinical Affairs Vice President for Facilities Director of the Occupational and Environmental Safety Office
Americans with Disabilities Act and accessibility compliance	Vice President for Administration Vice President for Information Technology
Foreign Corrupt Practices Act compliance	Vice President for Finance

The Office of Audit, Risk and Compliance performs monitoring and evaluations to assess program design and effectiveness. This is designed to fulfill institutional compliance responsibilities across a wide range of activities and provide reasonable assurance to the compliance risk owner and the Board of Trustees.