



— 2017 UT SYSTEM — LEGAL CONFERENCE

presented by the Office of General Counsel

THE UNIVERSITY of TEXAS SYSTEM | FOURTEEN INSTITUTIONS, UNLIMITED POSSIBILITIES.

Session 2

Compliance: What You Need To Know

September 28, 2017

Arthur Culpepper

Executive Director and
Deputy Compliance Officer

Cristina Blanton

Associate Systemwide Compliance
Officer and Privacy Officer

Trey Atchley

Chief Inquiry Officer

Jason King

Associate Systemwide Compliance
Officer and Ethics Officer

UT Systemwide Triage Team



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Composition

- Trey Atchley: Chief Inquiry Officer
- David Givens: Systemwide Compliance
- Alan Marks: Academic and Health Affairs
- Tamra English: Office of General Counsel
- Dyan Hudson: Audit



Investigative Functions

1. RECEIVE and ASSESS complaints.
 - Complaint hotline (anonymity and confidentiality)
 - BOR, Chancellor, OGC, HR, Audit, Compliance and Institutions
2. REFER complaints to the appropriate Institution for handling.
3. INVESTIGATE complaints arising within System Administration or referred by Institutions due to Executive Management conflict of interest.
 - Investigative composition: Two investigators and an OGC Attorney.



Predication (Evidence Sufficiency)

- Assessment: Does the complaint contain sufficient information to support the initiation of a formal investigation, dismissal, or require further inquiry prior to initiating a full investigation?
- Determining Factors
 - Seriousness of the alleged misconduct.
 - Is the Respondent an Executive Manager or Director?
(conflict of interest)



Predication (cont.) (Evidence Sufficiency)

- Determining Factors (cont.)
 - Analysis of initial complaint:
 - Anonymous or known Complainant.
 - Can allegations be independently verified through other witnesses or non-testimonial sources?
 - Is exculpatory evidence known or easily ascertainable?



Coordination

- Initiate executive level notifications via appropriate Triage Member.
 - Academic, Health, Legal, Compliance, Audit, HR
 - Notification without compromising the integrity, objectivity, neutrality, and efficacy of the investigative process.
- Track incidents via SharePoint and ensure visibility to BOR Legal and Chancellor Executive Director.



Questions



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