



A Member of The Texas A&M University System

Annual Compliance Program Assessment

MEASURING AN EFFECTIVE COMPLIANCE PROGRAM

1 (INERT)	2 (EMERGING)	3 (GROWING)	4 (MATURE)
Few or no policies and procedures	Underdeveloped or unenforced policies and procedures	Policies and procedures developed to cover substantive operations	Policies and procedures promulgated, implemented and periodically reviewed and updated
Constituents including high-level personnel not consciously interested in compliance	Constituents ambivalent or partly resentful about compliance requirements but growing in awareness of its importance	Constituents understand the importance of compliance and their responsibilities for compliance and ethics	Constituents invested in compliance; high level personnel oversee it
No compliance structure, officers or committees	Constituents begrudgingly cooperate with regulators and newly established compliance officers and committees	Constituents open with regulators and compliance officers and committees	Constituents proactively engage with regulators and compliance officers
Ad hoc, sporadic, or non-existent training in ethics and compliance	Training activities in development and early stages of application	Training activities developed and administered at appropriate levels	Training activities periodically updated, efficiently administered and recorded
Lacking or broken and mistrustful communication over ethics and compliance	Constituents realize the need to communicate about ethics and compliance	Improving lines of internal communication; developing mechanisms for reporting	Clear, efficient, and open internal communication mechanisms and attitudes
No systematic approach to compliance	Compliance programs developed or evaluated as problems arise	Establishment of compliance programs	Ongoing operation and monitoring of established compliance programs
Ad hoc, inconsistent, inadequate or lacking reactions to violations	Reactive “put out fires” mentality; realizing need to respond appropriately to violations	Developing mechanisms and procedures for discovering and responding to violations	Appropriate responses and corrective actions implemented when violations are discovered
Little awareness of risk	Compliance and risk receive attention when a violation occurs	Establishment of enterprise risk assessment framework	Risks identified, anticipated, avoided, and/or mitigated on a continuous basis