



## Compliance Corner

A compliance program should be more than a binder on a shelf. It must be an ongoing process, a commitment by an organization to an ethical way of doing business with integrity, and in keeping with our values. Compliance is about prevention, detection, collaboration, protection and accountability.

At UCSF our compliance is mandated by a multitude of governmental agencies and legislation - local, state and federal. Some examples include Health and Human Services (HHS); Centers for Medicaid and Medicare Services (CMS); Office of Inspector General (OIG); the False Claims Act (FSA), Occupational Safety and Health Administration (OSHA), Joint Commission on Accreditation of Healthcare Organizations (JCAHO), Health Information Portability and Accountability Act (HIPAA), Employee Retirement Income Security Act (ERISA), Equal Employment Opportunity Commission (EEOC), Federal Sentencing Guidelines to name a few.

How we comply, and in what spirit, is what the compliance program is paying attention to. The Chancellor appointed the *Steering Committee for Comprehensive Compliance and Internal Controls* a couple of years ago. The charge to its members is:

*“To ensure that appropriate compliance policies and procedures are in place and widely understood by the campus community; provide for the ongoing assessment of compliance with established policies and procedures; and make recommendations for improving the effectiveness of the Comprehensive Compliance Program.”*

The committee is chaired by Ara Tahmassian, Associate Vice Chancellor for Research and LaDene Diamond, Controller.

The committee has compiled a matrix of over 300 compliance areas affecting almost every activity on our campuses. To begin to grapple with the volume, the committee established a list of priorities deemed to be high risk areas to be used as test cases. One of the current priorities is Export Controls: shipping items out of the country.

**Export controls:** Since the 1940's the United States government has imposed restrictions on what can shipped out of the country. Many people assume that the regulations don't apply to them because what they are shipping has no military purpose. However, whether a product or service has a military use does not determine whether export controls apply to it (though this may help determine what controls do apply). Basic communication such as e-mails, telephone calls, and conversations with foreign born nationals can be subject to U.S. export controls.

There is a way to work with these regulations, and there are people here to help you determine whether or not your shipment requires a license for export .Please consult the [Compliance Website](#) for assistance, information, phone numbers and updates. You can also contact Marcy Fraser, UCSF Compliance Coordinator at [marcy.fraser@ucsf.edu](mailto:marcy.fraser@ucsf.edu) or 476-2719.

We are here to help. Compliance is not an option, but it does not need to be an obstacle.