

**College Procedure:** 703.3 - Compliance Oversight  
**Policy Reference:** 703 – IE Operational  
**Responsible Department:** Institutional Effectiveness  
**Approval Authority:** Cabinet  
**Procedure Owner:** Vice President, Institutional Effectiveness  
**Effective Date:** 9/30/2021

**Version Number:** 1  
**Legal Counsel Reviewed (yes/no):** No  
**Legal Reference(s):** N/A  
**Scope:** College-wide

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## Reason for Procedure

Federal, state, and local laws, regulations, and policies direct institutions of higher learning. In order to strengthen Kirkwood’s long-range sustainability, college-wide compliance oversight is critical to an effective and efficient process to address compliance mandates.

## Procedure

Compliance is managed at the departmental level, with broad compliance oversight performed within Institutional Effectiveness (IE). Risk owners within each department are responsible for performing compliance activities and monitoring compliance with higher education-related regulations, mandates, and college policies. IE does not assume the responsibilities of existing departmental compliance areas to address specific legal and regulatory requirements. IE’s role is to centralize the information produced by these departmental activities, provide coordination to ongoing efforts, and to assess Kirkwood’s overall compliance performance. IE can provide both internal and external stakeholders with consolidated, organized, and risk-based information in an objective manner.

IE’s responsibilities include:

- Providing general oversight of compliance obligations
- Communicating with departmental staff on compliance responsibilities
- Maintaining a calendar of compliance requirements, including due dates in Cobblestone
- Providing a central repository for compliance documentation (Cobblestone)
- Reviewing current compliance status monthly
- Reviewing future compliance readiness
- Addressing issues of noncompliance
- Reporting compliance status to the Audit Committee in regularly scheduled meetings

**Cobblestone**

Kirkwood uses the Cobblestone Contract Management System to track compliance requirements and the adherence to those requirements. Compliance requirements are maintained in Cobblestone, including the requirement descriptions, due dates, and the person responsible for updating adherence to the requirement. For most compliance requirements, evidence of compliance is attached to the compliance record in Cobblestone. See “Storing Compliance Documentation in Cobblestone Guide” in Reference section below for more detailed Cobblestone instructions.

By the 10<sup>th</sup> of each month, IE reviews compliance activity in Cobblestone for the prior month. Items marked as “Requirement Complete” by the department are reviewed to ensure evidence of completion has been attached (when applicable). IE completes the “Compliance Review” section which automatically rolls the due date recorded in Cobblestone to the next annual due date. If the due date is not annual, a manual adjustment to the due date must be made by IE. If a compliance requirement has not been recorded as complete by the responsible department, IE contacts the responsible party to investigate. IE should record relevant information about an incomplete compliance requirement within the compliance record notes field, e.g., why the requirement was not completed and the expected date of completion. Compliance concerns note resolved with the responsible party should be escalated to the responsible department cabinet member. See “IE Monthly Compliance Review Procedure” in Reference section below for more detailed Cobblestone instructions.

**References**

**Storing Compliance Documentation in Cobblestone Guide** – maintained in Cobblestone “KCC Reference Material” and embedded here:



Storing Compliance Documentation Guide

**IE Monthly Compliance Review Procedure**



IE Monthly Compliance Review

**Definitions**

Term	Definition
Term 1	
Term 2	
Term 3	
Term 4	

**Revision Log**

<b>Version Number</b>	<b>Date Approved</b>	<b>Approved by</b>	<b>Brief Description of Change</b>
1	9/30/21	Cabinet	New procedure