



Escalation Guidelines

USC's Compliance Program is anchored in a spirit of partnership and collaboration; we work together to meet our compliance obligations and community commitments. The Office of Culture, Ethics and Compliance ("OCEC") is available to the University community for consultation, conversation, and advice on compliance and ethics related matters.

Most potential issues are handled at the Compliance Area level. These Escalation Guidelines are provided as direction for those members of the USC community outside of OCEC to raise certain events or potential issues to OCEC.

These guidelines may also be used by Compliance Leads with their teams and/or schools, departments, and units so that they may become aware of compliance-related matters and escalate them to OCEC.

The following must be reported promptly to OCEC:

- Notification from a government agency or other regulatory body of a non-routine audit or investigation
- Action(s) by government agencies or other regulatory bodies that result in impacts or limits operations and/or results in fines/penalties/assignment of an independent monitor
- Notices of violations issued by (or site visits from) law enforcement or regulatory agencies that indicate a regulatory agency has reason to believe that there is an issue of non-compliance
- Pending self-disclosures that may indicate to regulatory agencies that there is an issue of non-compliance
- Events or conditions of non-compliance that create a threat and/or widespread impact to public health or safety (after other appropriate notifications)
- Fraud or false claims involving any government contract or program
- New or emerging laws and regulations, changes in operations, or other shifts in the compliance environment that impact compliance risks
- Inadequacy of compliance management practices, e.g.:
 - A commitment to implement or improve a compliance procedure that a CL reasonably believes has not been kept, even after discussions with the appropriate leadership, or
 - A significant disagreement about the adequacy of an existing or proposed compliance policy or procedure designed to meet compliance obligations (e.g. between a school/dean and a Compliance Lead)

Please email the Office of Culture, Ethics and Compliance at compliance@usc.edu with subject line "Escalation" for reporting and/or questions.