

Professional Standards and Business Conduct
University Compliance Program

Purpose

The mission and good reputation of Boston College require that all University personnel transact University business in a manner consistent with the highest ethical standards and in compliance with all

event of material non-compliance, and review risk mediation efforts. Factors to be considered in determining which compliance areas are to receive review may include the complexity of underlying regulations or other legal requirements, the relative familiarity of administrators with the compliance activity, and the potential impact of non-compliance to University activities.

3. *Executive Compliance Meetings.* The Director of Compliance shall meet quarterly with the Executive Compliance Committee to review compliance efforts, to develop recommendations to improve compliance on a University-wide basis and to review recent developments in the law, regulations, and best-practices related to compliance in higher education.

4. *Compliance Initiatives.* The Executive Compliance Committee shall formulate and assess University compliance initiatives. These initiatives shall include, without limitation, the mandating of remedial efforts by responsible Vice Presidents or Deans; proposals for new University policies; recommendations for new training programs, or other measures designed to improve compliance. The Director of Compliance shall typically have primary responsibility to implement Compliance Program initiatives, working in consultation with the Compliance Working Group and other administrators as appropriate; provided, however, that individual Vice Presidents and Deans shall retain responsibility for compliance in key areas for which they are identified as the responsible administrator in the Compliance Matrix.

5. *Annual Compliance Report.* The Director of Compliance shall prepare an annual report to the Board of Trustees on the University's compliance efforts during the preceding year. The report shall include, but not be limited to, the following information: (a) a summary of the compliance program; (b) a description of the compliance program's objectives and goals; (c) a description of the compliance program's activities and accomplishments; (d) a description of the compliance program's challenges and opportunities; (e) a description of the compliance program's budget and resources; (f) a description of the compliance program's effectiveness; (g) a description of the compliance program's impact on the University; (h) a description of the compliance program's future plans; (i) a description of the compliance program's relationship to other University programs and activities; (j) a description of the compliance program's relationship to the University's mission and values; (k) a description of the compliance program's relationship to the University's strategic plan; (l) a description of the compliance program's relationship to the University's risk management program; (m) a description of the compliance program's relationship to the University's internal control system; (n) a description of the compliance program's relationship to the University's legal and regulatory environment; (o) a description of the compliance program's relationship to the University's reputation and public image; (p) a description of the compliance program's relationship to the University's stakeholders; (q) a description of the compliance program's relationship to the University's culture and climate; (r) a description of the compliance program's relationship to the University's history and traditions; (s) a description of the compliance program's relationship to the University's future vision and aspirations; (t) a description of the compliance program's relationship to the University's overall success and well-being.