



University
of Vermont

WHAT IS A CULTURE OF COMPLIANCE?



An environment that supports adherence to the law and institutional policies and procedures. It is a culture that puts doing the right thing ahead of everything else. It sets the tone for expectations and it encourages and rewards ethical behavior.

Why Do We Need It?



November, 2015
University of Florida
fined \$19,875,000
for HHS grant
overcharges.



November, 2015
A Duke researcher engaged
in misconduct and in a
settlement agreement, he
received: a 5-year exclusion
from federally funded research,
retracted papers and other
sanctions.



August, 2015
Northeastern
fined \$2,700,000
for NSF grant
overcharges.



2008, John Roth
University of Tennessee
sentenced to 8 years in
prison for Export
Control violations.



In 2016, 200+
Universities under
investigation by DOE OCR
for Title IX compliance
related to campus sexual
assaults.

What Are Some Of The Benefits?



An effective compliance program encourages collaboration and communication. It recognizes that we are all in this together and our actions (or inactions) can impact others.

In the event of a violation, an effective compliance program is one of the few things that can reduce and even prevent fines, penalties and criminal prosecution.



Your program provides a reporting Helpline. The Helpline allows you to report or to get additional information without the fear of retaliation. It also allows you to report anonymously.

How Do We Get There?

The "Seven Steps" of An Effective Compliance Program



I. Written Standards
and Procedures



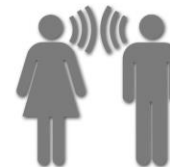
II. Designate a
Compliance Officer
and Committee



III. Avoid Delegation
of Authority to
Unethical
Individuals



IV. Education &
Training



V. Reporting, Auditing
& Monitoring



VI. Enforcement
& Discipline



VII. Response
& Prevention

CONTACT THE COMPLIANCE OFFICE AT 858-3086 OR EMAIL COMPLIANCE@UVM.EDU

COMPLIANCE AND ETHICS REPORTING & HELPLINE: VOICE 800-461-9330, TEXT 802-441-6649
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