



The 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  
OR ONLINE AT WWW.UVM.EDU/COMPLIANCE/HELPLINE