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 656-3886 or email compliance@uvm.edu
Compliance and Ethics Reporting & HelpLine: Voice 800-681-8330, Text 902-441-8649 or Online at www.uvm.edu/compliance/helpline