Texas A&M University - Compliance Program

Culture of Ethics and Compliance

Texas A&M University's (TAMU) Compliance Program establishes a framework for a strong culture of ethics and compliance. In accordance with System Regulation 16.01.01, *Systems Ethics and Compliance,* the TAMU Compliance Officer, with the Compliance Committee, implements a Compliance Plan to systematically address significant ethics and compliance risks. These risks are mitigated through activities that are modeled on the Federal Sentencing Guidelines.

TAMU Activities - Federal Sentencing Guidelines

Oversight and Interest by Executive Management

The Compliance Officer meets quarterly or as needed to apprise TAMU's President of progress on the Compliance Plan.   The briefing also may address significant new regulatory requirements, emerging compliance issues, significant ethics and compliance violations, and compliance reviews. Quarterly meetings are also held to update the Compliance Committee, comprised of the President's Executive staff or designee, of important compliance issues.

Risk Assessment

TAMU uses the Enterprise Risk Management program to identify and prioritize significant risks for the Compliance Plan. Executive and senior management responsible for specific risk areas set goals and metrics for effective risk mitigation. Progress is reported quarterly. The Compliance Plan is reviewed annually or more frequently if significant risks arise. Based on assessed risks, the Compliance Plan is modified.

Standards and Procedures

The Compliance Officer oversees coordination of TAMU rules and procedures that reflect regulatory and institutional requirements, clarify responsibilities, and set expectations for conducting operations. Rules and procedures are updated in response to regulatory changes and emerging risks. Coordination includes rules and procedures for branch campuses, Texas A&M University at Galveston and Texas A&M University at Qatar.

Communication

Information on new regulatory requirements and emerging risks are received through many sources at multiple TAMU operational levels. The Compliance Officer, System Compliance and Ethics Officer, and Office of General Council and others communicate information and provide guidance to administrators responsible for specific risk areas.

Education and Training

Education and training are fundamental to raise awareness of ethics and compliance requirements, responsibilities in fulfilling the requirements, and the consequences of non-compliance. Training and education programs are included as mitigation actions in the Compliance Plan.

Monitoring and Reporting

Monitoring is an on-going process to review the results of mitigation activities, indicate effectiveness of the activities, and make adjustments as needed. Monitoring at various organizational levels is a recurring metric included in the various risk areas of the Compliance Plan. Reporting results of monitoring activities upward provides relevant information for assessing the status of operational compliance and making decisions for future actions.

Enforcement

Enforcement of compliance requirements is applied in accordance with established rules and procedures.

Response

A significant compliance incident or violation necessitates prompt response to remediate a violation and take actions to prevent similar future occurrences. Steps include planning, protocols, notification to appropriate officials, and actions that protect persons and property at TAMU and the surrounding community from harm.

Responsibility for TAMU's Culture of Ethics and Compliance

Fulfilling TAMU's commitment to ethical conduct and compliance with legal obligations is a personal responsibility. Key activities in carrying out this responsibility include awareness, reporting, and accountability.

Awareness

Awareness of requirements set by regulators and System and TAMU policies, regulations, rules and procedures and alertness to activities in work areas are critical for persons to do the right thing.

Reporting

Reporting issues that do not meet established requirements is everyone's responsibility, regardless of position. If a concern is identified but not reported, the concern may remain undetected and lead to serious consequences. Any identified actual or potential concern should be reported upward in the organization to those who can address the concern. The Risk, Fraud, and Misconduct Hotline is available and provides a way to anonymously report instances of non-compliance. Reporting is a personal responsibility for promoting an ethical and safe environment.

Accountability

Accountability reflects willingness to accept responsibility for one's actions. This may involve different actions depending on each person's work role. For example:

- Take action to correct a violation or incident;
- Draft or update a rule and procedure;
- Verify required licenses and permits are in place and current; or
- Submit timely reports as required by regulators and sponsors.

Each person's accountability in their daily work activities contributes to a strong culture of ethics and compliance at TAMU.