

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 applicable laws, regulations, and University Policies. This Policy outlines procedures designed to provide oversight and coordination of the efforts of responsible Boston College administrative units to promote legal compliance and best practices within their respective areas of activity.

Definitions and Roles

The “**University Compliance Program**” or “**Compliance Program**” refers to the system of University-wide policies and initiatives designed to promote conduct that complies with applicable legal, policy and ethical standards, and to deter and detect conduct that fails to comply with such standards.

The “**Executive Compliance Committee**” shall be responsible for the oversight of the Compliance Program by establishing direction and priorities for Compliance Program policies and initiatives. The Executive Compliance Committee shall be chaired by the Executive Vice President with support from the Director of Compliance, and shall include the Financial Vice President and Treasurer, the Provost and Dean of Faculties, the Vice President for Human Resources, the Vice President for Student Affairs, and the General Counsel. The Director of Internal Audit shall participate in Executive Compliance Committee meetings in a consultative capacity.

The “**Director of Compliance**” shall be responsible for the administration of Compliance Program initiatives, including the development and maintenance of University-wide policies addressing compliance obligations. The Director of Compliance shall lead periodic reviews of the compliance practices used to manage a particular set of compliance requirements, and advise and assist administrative units in the response to reports of non-compliance. The Director of Compliance shall report on compliance matters regularly to the Executive Compliance Committee.

The “**Compliance Working Group**” or “**Working Group**” shall refer to those administrators designated from time to time by University Deans and Vice Presidents in consultation with the Director of Compliance, as having charge for compliance efforts within their administrative unit.

Procedures

1. *Compliance Tracking.* In consultation with the Director of Compliance, each administrative division will maintain a list of the compliance obligations applicable to the division’s activities. This information shall be provided to the Director of Compliance, who shall use it as the basis for the development and maintenance of a matrix and inventory summarizing compliance obligations across the University (the “**Compliance Matrix**”).

2. *Reviews of Compliance Effort.* The Executive Compliance Committee shall have responsibility to establish a schedule of key area compliance reviews. Reviews shall be led by the Director of Compliance to evaluate the adequacy of compliance practices in an area, assess risk posed to the University in the

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.* In consultation with the Executive Vice President and the General Counsel, the Director of Compliance shall report annually to the Audit and Finance Committee of the Board of Trustees. The annual report shall communicate the findings of the Executive Compliance Committee concerning any material instances of non-compliance, areas where there exists a risk of material non-compliance, ongoing and proposed compliance initiatives, and significant new compliance requirements under federal, state or local law.

Approved: William P. Leahy, S.J.  
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