

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

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 Internal Compliance Report.* The Director of Compliance shall submit an annual report to the Executive Compliance Committee regarding compliance activities during the year.