

## University-wide Compliance Program

### Overview

The Compliance Program's mission is to promote ethical conduct and strengthen compliance with applicable laws, policies, rules, and procedures. A compliance program is more than a policy or the intent to comply with applicable laws. Simply stated, a compliance program creates a process to improve internal controls, reduce compliance risks, and meet stakeholder expectations for integrity and accountability.

### Approach

The approach is a University-wide process. The Compliance Program leverages resources through coordination and collaboration with subject matter experts who are knowledgeable of regulatory requirements, related exposures, and emerging issues for their areas. [Research](#) and [Athletics](#) have their own compliance functions.

### Structure

- Governance: a code of conduct and standards that set values, boundaries, and expectations.
- Oversight: leadership and responsibility to oversee compliance with laws and standards.
- Educate: communication to enhance awareness and understanding of compliance at all levels.
- Assessment, monitoring, reporting: evaluating activities and reporting results to management, including a system for employees to report wrongdoing or make inquiries without fear of retaliation.
- Response and Prevention: prompt remediation of identified issues, and actions to prevent reoccurrence of similar issues.

### Governance

Code of Conduct, better known as the Texas Aggie Honor Code:

"An Aggie Does Not Lie, Cheat, or Steal, Nor Tolerate Those Who Do."

The Aggie Code of Honor affirms values that apply to students, faculty, and staff alike. This simple, straightforward statement embraces core values of honesty and integrity that trace to early Texas A&M University tradition. This statement also projects Texas A&M University's commitment to ethical conduct and underscores the relationship of ethical conduct and compliance, two fundamental elements for a culture of excellence. [Code of Conduct](#)

Formal Standards:

University Rules coordinates and maintains official standards, i.e., University rules and procedures that set direction and boundaries for University operations, including branch campuses at Galveston and Qatar. University rules and procedures are consistent with and may supplement System policies and regulations. The rules define requirements, delegate authority, establish structure, and address regulatory requirements. Procedures identify steps to carry out specific processes. Maintaining standards that address changing regulatory requirements, current business practices, and a balanced approach to governance is on-going. [TAMU Rules - Home Page](#)

## Oversight

Texas A&M University is a large research intensive institution of higher education with multiple complex operational areas, many of which are highly regulated. University Risk and Compliance oversees the Compliance Program to enhance assurances that compliance requirements are upheld. Activities are coordinated to expand awareness and facilitate responses to important compliance issues. Also, an Advisory Council has been established to offer advice and direction to the Compliance Program.

## Education (Communication and Training)

To “do the right thing” - faculty, staff, and management at all levels need a clear understanding of their compliance responsibilities and consequences for violations. The Compliance Program communicates information through reviews, consultations, University Rules, electronic distributions, training presentations, and the web. Communication among subject matter experts and work groups enhances alignment of internal controls with changes in regulations and operational practices. Information exchange also is enhanced through coordination with Texas A&M System offices, including General Counsel, Internal Audit, the System Policy Office, and others as appropriate.

The Compliance Helpline is available for persons who have questions or concerns but are not certain of the proper action to take. [University-wide Compliance Program - Compliance Helpline](#) A reporting hotline is hosted by System Internal Audit to enable individuals to report wrongdoing anonymously without fear of retaliation. [Reporting Fraud, Waste and Abuse](#)

## Assessment, Monitoring, and Reporting

Management is responsible for assessing compliance risks, monitoring internal controls, reporting results upward, and taking corrective action as needed. The Compliance Program supports management through internal reviews and other activities that assess and monitor if processes and related internal controls facilitate compliance with internal and external regulations, policies, and rules; safeguard resources; and balance effective internal controls with efficient operations. Reviews are selected based on significant issues, risks, and other concerns identified by University management; System, State and federal audits; and others.

Results of management reviews are reported to executive management and those who can affect positive change. Executive management receives timely notifications of significant compliance exposures and/or violations as they become known. Periodic reports, presentations, and briefings apprise executive management of significant compliance risk areas and the status of Compliance Program activities.

## Response and Prevention

The Compliance Program advocates proactive management of non-compliance events. Advance planning and established protocols support comprehensive and timely responses. Non-compliance frequently represent gaps in understanding and/or communication. Closing these gaps involves: clarifying responsibilities, increasing knowledge, communicating significant information upstream (and externally when necessary); and establishing a consistent expectation of enforcement so that employees take seriously their compliance responsibilities. Post-event analysis and corrective action plans also assist in preventing reoccurrence of similar non-compliance events.

## Meeting Objectives

Individually, each member of the student body, faculty, and staff is responsible for ethical conduct and compliance in carrying out daily activities. Collectively, Compliance Program activities promote and support individual accountability and advance a culture of excellence.