I. What Compliance Program?
   A. External Requirements
      1. Legal Requirements
         a) Federal requirements
         b) State requirements
      2. Accreditation Standards
         a) Institutional accreditation
         b) Programmatic accreditation
   B. Internal Requirements
      1. Institutional mission
      2. Code of conduct
      3. Policies and procedures

II. Developing a Compliance Program
   A. Identify Goals
      1. Create a culture that promotes honest and ethical behavior
      2. Educate constituents about compliance requirements
      3. Evaluate compliance through regular collection and analysis of data
      4. Respond appropriately to incidents of noncompliance
   B. Establish an Institutional Compliance Committee
      1. Membership
      2. Authority
      3. Regular meetings

III. Educating Constituents
   A. New Employees
      1. Employment application
      2. Interview
      3. Orientation
<table>
<thead>
<tr>
<th>a) Code of ethics</th>
</tr>
</thead>
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<tr>
<td>b) Employee handbook</td>
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<tr>
<td>c) Online training (e.g., sexual harassment training)</td>
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</tbody>
</table>

### B. Current Employees

1. Periodic training
   a) Face-to-face
   b) Online

2. Regular department meetings

3. Intranet portal

### C. Students

1. Institution website
2. Academic catalog
3. Student handbook
4. Classroom
5. E-mail, social media, etc.

### D. External Constituents

1. Service Providers
   a) Contract negotiations
   b) Contract provisions

2. Others (e.g., parent who requests child’s education records)

### IV. Assessing Compliance

A. Collect information, analyze data, and determine appropriate action

1. Regular reporting
2. Individual reports
3. Periodic audits
   a) Internal auditors
   b) External auditors
4. Compliance visits

B. Review policies, procedures, and practices at scheduled intervals, and revise as necessary
C. Monitor changes in legal requirements and accreditation standards, and modify compliance activities accordingly

V. Enforcing Compliance
   A. Acknowledge compliance
   B. Recognize noncompliance
      1. Encourage reporting
         a) Hotline
         b) Protect the messenger
      2. Investigate
      3. Communicate with agencies, as necessary
      4. Determine appropriate action
         a) Discipline
         b) Review lessons learned
         c) Educate

VI. Compliance Matrix
   A. Function
   B. Compliance Requirements
      1. External Requirements
      2. Internal Requirements
   C. Compliance Actions
      1. Develop
      2. Educate
      3. Assess
      4. Enforce

VII. Examples of Compliance Programs
   A. Catholic University of America
   B. Stanford University
   C. University of Texas

VIII. Questions/Discussion
Scholar University expects and requires honest and ethical conduct by each member of the university community and full compliance with the university's:

- Mission
- Code of Ethics
- Policies and Procedures
- Accreditation Standards
- Legal Requirements

The following table provides links to compliance requirements and actions by the university to develop, educate, assess, and enforce compliance with those requirements.

<table>
<thead>
<tr>
<th>Ethics, Conduct, and Compliance*</th>
<th>Compliance Requirements</th>
<th>Compliance Actions</th>
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<tbody>
<tr>
<td></td>
<td>External</td>
<td>Internal</td>
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<tr>
<td>1. Academics</td>
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<td>2. Admissions</td>
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<td>3. Athletics</td>
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<td>4. Facilities</td>
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<td>5. Financial Aid</td>
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<td>6. Finances</td>
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<td>7. Governance</td>
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<td>8. Human Resources</td>
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<td>9. Information Technology</td>
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<td>10. Marketing</td>
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<td>11. Student Accounts</td>
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<td>12. Student Services</td>
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</tbody>
</table>

* Click links and buttons within table to view information.

**Reporting Noncompliance**

Persons who become aware of a violation, or possible violation, of the university's compliance requirements should promptly contact the university's chief compliance officer.

**Chief Compliance Officer**

E-mail: compliance@scholar.edu
Telephone: (123) 456-7890
U.S. Mail: Chief Compliance Officer
Scholar University
123 Wisdom Way
Academic, SD 45678
Federal Law

Age Discrimination Act of 1975
prohibits discrimination based on age in programs or activities that receive federal financial assistance.
- 42 USC § 6101 et seq.
- 34 CFR § 110.1 et seq.; 45 CFR § 90.1 et seq.

Americans with Disabilities Act of 1990 (ADA)
prohibits discrimination based on disability in public entities.
- 42 USC § 12101 et seq.
- 28 CFR § 35.101 et seq.

Civil Rights Act of 1964
prohibits discrimination based on race, color, or national origin in programs or activities receiving federal financial assistance.
- 42 USC § 2000d
- 34 CFR § 100.1 et seq.

Copyright Act
- 17 USC § 101 et seq.
- 37 CFR Part 201 et seq.
- Copyright Basics | Copyright FAQs

Family Educational Rights and Privacy Act of 1974 (FERPA)
provides students with the right to control the disclosure of their education records, inspect and review their records, and seek amendment of their records.
- 20 USC § 1232g
- 34 CFR § 99.1 et seq.

Education Amendments of 1972
prohibits discrimination based on sex in programs and activities that receive federal financial assistance.
- 20 USC § 1681 et seq.
- 34 CFR § 106.1 et seq.

Rehabilitation Act of 1973
prohibits discrimination based on disability in programs or activities receiving federal financial assistance.
- 29 USC § 794
- 34 CFR § 104.1 et seq.

State Law

Scholar University is authorized to offer academic programs in accordance with the requirements of the states in which it operates. To maintain such authorizations, the university must comply with the requirements of each state.
- State Authorizations
- Separate Program Authorizations
**Institutional Accreditation**

Scholar University is accredited by The Higher Learning Commission (HLC), a commission of the North Central Association of Colleges and Schools (NCA). *(The foregoing statement is for illustration purposes only).* To maintain its accredited status, the university must comply with requirements established by the HLC.

- The Higher Learning Commission
- Statement of Affiliation Status
- Maintaining HLC Accreditation
- HLC Policies

**Programmatic Accreditation**

Several academic programs are separately accredited or approved by national educational and professional associations. To maintain their accredited or approved status, each program must comply with the requirements established by the respective associations.

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**University Requirements**

Academic activities of the university must comply with the following internal requirements:

- Mission
- Code of Ethics
- Academic Catalogs
- Academic Policies and Procedures
  - Academic Decision-Making Processes
  - Academic Integrity Policy
  - Assessment
  - Attendance
  - Auditing a Course
  - Block Transfer
  - Certificate Credit
  - Change of Program
  - Change of Registration
  - Course Substitution
  - Equal Educational Opportunity
  - Examination for College Credit
  - Faculty Grade Reports
  - Fresh Start
  - Grade Change
  - Grade Grievance
  - Grading Standards
  - Graduation Requirements
  - Incomplete Grade
  - Individual Independent Study
  - Military Training Credit
  - Nontraditional Credit
  - Prerequisite Waiver
  - Repeated Course
  - Request for Course Overload
  - Retention of Student Files
  - Satisfactory Academic Progress
  - Standardized Examination Credit
  - Student Re-entry
  - Transcript Request
  - Withdrawal
<table>
<thead>
<tr>
<th>Academic Compliance Actions</th>
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<tbody>
<tr>
<td><strong>Develop</strong></td>
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<tr>
<td>Academic policies and procedures are developed through academic decision-making processes involving:</td>
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<tr>
<td>• Board of Governors</td>
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<td>• Chief Executive Officer</td>
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<tr>
<td>• Provost</td>
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<tr>
<td>• Academic Affairs Committee</td>
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<td>• Curriculum Council</td>
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<tr>
<td>• Program Assessment and Curriculum Committees</td>
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<td>• System Assessment Steering Committee</td>
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| **Educate**                  |
| Faculty and staff are educated about academic compliance requirements through: |
| • Faculty/staff orientation  |
| • MyNAU portal               |
| • Online training/webinars   |
| • Face-to-face training      |

| **Assess**                   |
| Academic compliance requirements are assessed by: |
| • Institutional Assessment Plan |
| • Academic Program Assessment Plans |
| • Institutional Accreditation Process |
| • Programmatic Accreditation Process |
| • Academic Program Reviews    |
| • Course Evaluations          |
| • Periodic Formal Review of Policies and Procedures |
| • Agency Reviews              |

| **Enforce**                  |
| Academic compliance requirements are enforced by: |
| • Provost                      |
| • System Vice President for Curriculum and Instruction |
| • Academic Integrity Committee|
| • Academic Deans               |
| • Academic Standards Committee |
| • Grade Grievance Committee    |
| • Faculty                     |
| • Chief Compliance Officer    |