

COMPLIANCE & ETHICS PROGRAM

I. MESSAGE FROM THE PRESIDENT

Cultivating a community where compliance is valued and supported requires that we work collaboratively across the university and recognize that compliance with laws, regulations, and policies is a university goal that must be managed and administered broadly. Every member of the RIT Community should consider compliance with laws, regulations, and RIT policy as part of their job. For this reason, compliance must be addressed at a university-wide level.

Keeping current with changes in the laws and regulations that affect your subject area can be challenging. It is important to know that there are university resources available to help you. As you conduct work, these university resources can help you identify areas with compliance and legal responsibilities. The university offices identified in the Compliance Management Framework are available to provide assistance as you work to fulfill these responsibilities.

We all work within divisions and departments with supervisory structures, and it is important that we work within those structures. Consulting with colleagues within your division or department is critically important. Indeed, in some areas, your supervisor or colleague is an expert in a particular area and should be consulted for guidance. However, it is also important for all to understand that legal and compliance judgments – including sometimes making a determination regarding whether a legal or compliance issue exists – should be made in consultation with personnel at RIT who have experience and training in these areas and are responsible for making these judgments on behalf of RIT. Seeking compliance or legal advice outside of your department does not mean that you are questioning your supervisor or another colleague; but rather it should be a practice with which everyone at the university is comfortable.

In all cases, the time and effort spent to raise issues, or obtain advice are well worth any effort expended. The benefit of collaborating with others across the university is that a larger group at RIT will share a common understanding and work together towards a common goal. This attitude towards collaboration should be supported, rewarded, and instilled in every member of the RIT community.

II. PURPOSE

As part of RIT's mission to shape the future and improve the world through creativity and innovation, RIT believes it is essential to foster a community in which integrity and ethical behavior is paramount. To that end, RIT has adopted the [Compliance Policy and Code of Ethical Conduct](#), [Honor Code \(P03.0\)](#), and [Core Values \(P4.0\)](#), which are designed to guide all members of the RIT Community in their daily

conduct in all university-related activities. In addition, RIT operates in a highly regulated environment. Offices and individuals across the RIT campus are faced with numerous legal and regulatory requirements. Students, faculty, staff, and trustees must strive to conduct themselves ethically and in compliance with all laws and regulations. Although these offices and individuals are already working diligently to ensure compliance with these requirements, these requirements can be complex.

RIT's Compliance Program (the "Program") is a means to implement the Compliance Policy and Code of Ethical Conduct and to promote ethical conduct and compliance across the entire RIT community. This Program is designed to be streamlined, efficient, transparent, and to provide the following:

- 1) Effective communication with all faculty, staff, students, administrators, and trustees about their specific ethical obligations;
- 2) Objective monitoring of key university offices to ensure compliance with specific legal and regulatory requirements;
- 3) Practical guidance to all faculty, staff, students, administrators, and trustees when questions arise about how to behave or what course of action to take in specific situations; and
- 4) Remedy the effects of any noncompliance.

III. EFFECTIVE DATE

This Compliance & Ethics Program will be effective on July 1, 2011 ("Effective Date"). It will apply to all divisions, departments, and academic units of RIT.

IV. SCOPE

The Compliance Policy and Code of Ethical Conduct, the RIT policies and procedures it incorporates, and this Program apply to any member of the RIT Community who acts on behalf of the university, including faculty, staff, students, administrators, and trustees.

V. THE COMPLIANCE & ETHICS PROGRAM

The Program reflects a strong commitment by the President, the Board of Trustees, and senior administrators of the university to comply with all applicable laws and regulations and to operate the university in a manner consistent with the highest levels of integrity and ethical conduct. The elements of the Program are prescribed by applicable regulations or guidelines and has been developed in accordance with various legal and regulatory requirements and guidance, including the United States Sentencing Commission guidance on effective compliance and ethics programs.¹

¹ U.S. Federal Sentencing Guidelines Manual §8B2.1 (2016). See also U.S. Department of Justice Evaluation of Corporate Compliance Programs (2019).

The Program consists of the following:

- 1) The [Compliance Management Framework](#) (the “Framework”), which gives the RIT Community a broad overview of the management and governance structure of the Compliance & Ethics Program. The Framework will be modified as necessary, and provides the tools and processes available to the RIT Community to implement the Compliance & Ethics Program.
- 2) The [RIT Compliance & Ethics Program Standards and Responsibility Matrix](#) which details the duties and responsibilities of each key member of the RIT Community as it relates to the Compliance & Ethics Program;
- 3) The policies and procedures developed by the university to address university, statutory, and regulatory requirements.

Adopted: July 2011
Revised: June 2019