I.  INTRODUCTION

As part of RIT's mission to provide excellence in education and research, RIT believes it is essential to foster a community in which integrity and ethical behavior is paramount. To that end, RIT has adopted its Compliance Policy and Code of Ethical Conduct http://www.rit.edu/academicaffairs/policiesmanual/sectionC/C0.html, which is 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, and 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 has adopted its Compliance Policy and Code of Ethical Conduct and other policies and procedures in order to assist members of the RIT Community to help ensure legal and regulatory compliance. In addition, RIT has adopted this Compliance Program and Procedure (the “Program”) as 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 all University offices to ensure compliance with specific legal and regulatory requirements; and

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.

II.  EFFECTIVE DATE:

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

III.  APPLICABILITY:

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.
IV. THE COMPLIANCE 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.

A. GOVERNING STRUCTURE:

1. The Audit Committee of the Board of Trustees.

The Audit Committee of the Board of Trustees shall oversee and authorize all significant Program activities. Compliance and ethics issues and the operations of the Program will be an agenda item for each regularly scheduled Board of Trustees Audit Committee meeting. The Chief Risk & Compliance Officer ("CRCO"), the Assistant Vice President of the Office of Institute Audit, Compliance & Advisement ("IACA"), the Office of Legal Affairs ("OLA"), and/or any applicable Vice President of the University may report to the Audit Committee on issues related to the Program or a particular compliance issue.

In addition, the Audit Committee itself, or through its designees, will regularly present a compliance and ethics update at general Board of Trustees meetings. The Audit Committee will update the full Board on the Program activities and address any existing resolutions regarding the Program and its components. The Board of Trustees will make use of executive sessions, as appropriate, to address particular compliance and ethics issues.

2. Chief Risk & Compliance Officer.

The CRCO is responsible for the day-to-day operations of the Program, and will have primary responsibility for the implementation, operation, and enforcement of the Program. The CRCO's duties include the following:

- Drafting and revising Program related policies, procedures, and internal controls;
- Working with the Assistant Vice President of IACA to oversee procedures to monitor and audit compliance with the Program;
- Overseeing development and delivery of the Program training materials, where appropriate;
- Evaluating reported violations and collaborating with the OLA, as appropriate, on any investigations;
- Designing and implementing appropriate responses to compliance failures and necessary modifications and enhancements of the Program; and
- Reporting to the Audit Committee on a periodic basis on matters relevant to the Program.

The CRCO remains ultimately responsible for the foregoing functions; however, he/she may appoint a designee as necessary to perform some of these functions. The CRCO reports to the Vice President for Finance and Administration. The CRCO may report a matter directly to the Audit Committee on issues of University level importance.
3. **RIT Compliance Committee.**

The RIT Compliance Committee is responsible for ensuring that the Program meets its objective activities by providing advice, guidance, and support in the operation of the Program. The CRCO will oversee and use the resources and knowledge of the members of the Compliance Committee to accomplish this end. The Compliance Committee will support the CRCO with all aspects of the implementation of the Program.

4. **RIT Office of Legal Affairs.**

RIT’s Chief Legal Officer and OLA should work closely with the CRCO and the Compliance Committee to provide assistance and advice when needed in implementation and execution of this Program.

5. **RIT Office of Institute Audit, Compliance & Advisement.**

IACA will be responsible for conducting the regular audits of the Program, and will work with the CRCO and the Compliance Committee to implement these procedures and report the findings of its compliance audits. As part of his/her other reporting to the Audit Committee, the Assistant Vice President of IACA will also regularly advise the Audit Committee of the Board of Trustees of the status of the auditing/monitoring of the Program.

**B. COMPLIANCE PROGRAM ACTIVITIES**

This section describes the elements of the Program which are prescribed by applicable regulations or guidelines and which will be modified as necessary and monitored by the CRCO. The Program 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. **Assessment of Risk.**

The CRCO will consult regularly with senior administrators identified for each compliance area to review any changes in law that affect compliance, and ensure that written policies and procedures guiding each compliance area are clear and current. The results of the consultative meetings between the CRCO and senior administrators shall be documented and shared with the Assistant Vice President of IACA and shall be considered in the annual IACA risk assessment process. The CRCO, in consultation with the Assistant Vice President of IACA, will review the risk areas identified through the IACA risk assessment process and develop a plan to address any significant legal or regulatory compliance risks facing RIT.

2. **Written Policies and Procedures.**

To facilitate the objectives of this Program, RIT has established various policies and procedures. The CRCO shall consider supplementing, modifying, replacing or repealing policies whenever necessary and consistent with applicable laws and regulations. When required, the CRCO will obtain approval from the applicable governance boards when required to change policies and should inform the Audit Committee of the Board of Trustees of any
changes, modifications or additions relating to the policies. The CRCO may supplement, modify, replace or repeal specific procedures whenever necessary, and consistent with applicable laws and regulations. The CRCO shall consult with the Chief Legal Officer when appropriate.

3. **Compliance & Ethics Communications and Training.**

All faculty, staff, students, administrators, and trustees are required to familiarize themselves with the Compliance Policy and Code of Ethical Conduct and must be knowledgeable about the operation of the Program. RIT has taken diligent steps to assist members of its community to comply with many of these laws and regulations by drafting policies and procedures that outline appropriate conduct. These policies and procedures are available on RIT’s website. Periodic communications shall be made to ensure that all faculty, staff, students, administrators, and trustees, including new hires, understand RIT's values, relevant RIT policies and procedures, and their compliance obligations.

4. **Overseeing Confidential Ethics and Integrity Reporting.**

All faculty, staff, students, administrators, and trustees are required to report any potential violation of the Compliance Policy and Code of Ethical Conduct, the Program, or any written RIT policy.

The CRCO will be responsible for ensuring that RIT maintains current reporting mechanisms accessible to all Members of the RIT community. Specifically RIT maintains at least three different reporting mechanisms: (1) direct reporting to individual supervisors, (2) reporting via telephone to the RIT Ethics Hotline at (866) 294-9358 or (866) 294-9572 TTY, and (3) online reporting to the RIT Ethics Hotline available at http://finweb.rit.edu/svp/ethics/.

5. **Conducting Internal Compliance Investigations.**

The CRCO, or his or her designee, along with appropriate University employees, are responsible for fielding reports of potential violations from members of the RIT community. Reports from the RIT Ethics Hotline are distributed per administrative instructions. The CRCO, OLA, IACA, Controller’s Office, Information Security Office, Human Resources, or if applicable, Public Safety, consistent with other RIT Policies and practices will then be responsible for conducting an investigation of the potential violations. The CRCO will assist the individuals conducting an investigation, as applicable, to ensure that any compliance deficiencies are fully understood so that corrective action plans may be established with the specific business unit.

Internal investigations should include a review of all material, relevant facts and documentation, as well as interviews with members of the RIT Community, as appropriate and be as prompt as the particular circumstances will allow. All members of the RIT Community are expected to cooperate fully with any requests made of them in connection with any such investigation and to provide truthful and accurate information.
6. **Determining Consequences of Non-Compliance.**

In the event a violation of the Compliance Policy and Code of Ethical Conduct, the Program, or any written RIT policy, the CRCO will work with all relevant parties, including University disciplinary authorities, to address the alleged violation promptly and in accordance with RIT’s other policies and established disciplinary procedures. RIT may take remedial action including, but not limited to, discharge from the RIT community. As appropriate, the University will inform the proper governmental authorities of a violation.

7. **Ongoing Auditing, Monitoring and Reviews.**

The CRCO, in consultation with the Assistant Vice President of IACA, shall oversee a process to monitor and audit compliance with the Program, including periodic review and revision of the Program and its policies when necessary. The Assistant Vice President of IACA will share audit and review results, and make recommendations to the CRCO, so that the CRCO may design and implement appropriate remedial action in the event of any violation of the law or regulations, the Program, or any University policy or procedure.