



Pima County Community College District Board Policy

<i>Board Policy Title:</i>	College Compliance
<i>Board Policy Number:</i>	BP 2.18
<i>Adoption Date:</i>	7/8/15
<i>Schedule for Review & Update:</i>	Every three years
<i>Review Date(s):</i>	7/8/15, 4/19/18, 9/13/23
<i>Revision Date(s):</i>	9/13/23
<i>Sponsoring Unit/Department:</i>	Chancellor
<i>Motion Number:</i>	201507-05
<i>Legal Reference:</i>	Federal Sentencing Guidelines, Sec. 8B2; False Claims Act; DOJ Evaluation of Compliance Programs
<i>Cross Reference:</i>	Employee Code of Conduct

Pima Community College (“College”) is committed to maintaining an institutional culture of ethical conduct, accountability, and compliance with all legal and accreditation requirements as well as all College policies and procedures. Accordingly, the Governing Board delegates to the Chancellor the authority and responsibility for establishing a College-wide compliance and ethics program. The compliance and ethics program shall include at least the following elements:

- written policies, procedures, and standards of conduct
- compliance effectiveness assessment
- internal monitoring
- mandatory training
- periodic risk assessment
- standards and procedures for discipline and enforcement
- response to identified issues

The Chancellor may delegate this responsibility to a Chief Compliance Officer at the senior management level who shall have direct access to the Chancellor, the

Governing Board, and the Finance and Audit Committee. The Chief Compliance Officer or designee shall have access to all records for Compliance program purposes.

All employees have an affirmative duty to report suspected fraud or abuse to their supervisors, management, the Internal Auditor, or the Chief Compliance Officer. Reports may be made confidentially through the EthicsPoint hotline. The Chief Compliance Officer has an affirmative and independent responsibility to report fraud or abuse consistent with law and College policy. Retaliation for reports made in good faith, even if inaccurate, is prohibited.

Contractors and consultants are held to the same standard as employees.

The Chancellor or designee will provide the Governing Board, at least annually, a report regarding the College compliance program. The Chief Compliance Officer shall provide information to the College Community on compliance and ethics programs and how to report potential fraud or abuse at least once each year.