



Policy Information

Policy Title: The Office of University Compliance Charter

Issuing Office: The Office of University Compliance

Affected Parties: All employees of the University share a responsibility for maintaining an environment of accountability and integrity.

Policy Language:

MISSION

The University is committed to the highest standards of ethical and lawful conduct in all academic and business activities. The President established University Compliance in the Fall of 2023 to be responsible for developing and monitoring the enforcement of an institution-wide compliance program. University Compliance's mission is to promote a culture of compliance and ethical behavior among all the members of the Liberty community in carrying out the University's mission with integrity and in accordance with our legal, regulatory, and ethical responsibilities.

AUTHORITY

University Compliance has independent oversight over the adequacy of compliance activities at the University. University Compliance, with stringent regard for information safekeeping and confidentiality, and subject to the applicable policies of this institution, will have access to all institutional activities, records, property, and employees as may be necessary to fulfill its responsibilities. The Senior Vice President ("SVP") of University Compliance, or their designee, is authorized to have full, free, and unrestricted access to all of the University's records, physical properties, and personnel pertinent to carrying out compliance investigations and reviewing and monitoring compliance issues. All employees are requested to assist University Compliance in fulfilling its roles and responsibilities. University Compliance will seek advice from the Office of Legal Affairs before accessing or disclosing University records protected by attorney-client privilege (e.g., communications between University attorneys and client representatives intended to seek, obtain, or provide legal advice) or attorney work product privilege.

INDEPENDENCE AND OBJECTIVITY

To ensure impartial and unbiased judgment, which is essential to properly conducting a compliance program, University Compliance will remain free from interference by any element in the University regarding matters of meeting compliance standards, including implementation of corrective actions and reporting of violations. University Compliance will exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about federal, state, and local laws as applicable. The University Compliance team will make balanced assessments of all the relevant laws and regulations

and will ordinarily include the Office of Legal Affairs when making determinations that a University's practice or action has violated a compliance standard, and will seek legal advice on final outcomes as needed. The SVP of University Compliance will regularly report to the President and Board of Trustees the goals and standards of the compliance program and will, at a minimum, provide progress reports to the Audit Committee of the Board of Trustees on a bi-annual basis.

RESPONSIBILITY

The scope of University Compliance encompasses but is not limited to:

- Providing feedback on the University's strategic planning process, including short- and long-term compliance plan development, review, approval, implementation, and evaluation.
- Assisting with internal reviews to assess University compliance with applicable laws and regulations in coordination with other support departments like Internal Audit, Strategic Analysis Team, and Risk Management.
- Assisting with targeted compliance reviews.
- Leading the University-wide compliance network, creating and supporting the University Compliance Council, and maintaining a University Compliance matrix that will encompass functional specialists throughout the University that oversee areas of compliance.
- Assisting in researching and implementing new and existing policies and procedures, institution-wide, related to regulatory compliance areas, including Title IV and state regulations.
- Assisting in the mitigation of risks that the institution incurs by accurately recording and reporting on areas of compliance.
- Developing regular compliance reports, including official annual reports related to areas of oversight.
- Ensuring the efficient use of University systems to support adequate recordkeeping related to compliance. Recommending solutions for adequate record maintenance and processes and ensuring the right policies and systems are in place to document compliance efforts and to provide related audit support.
- Recommending training for Liberty University departments related to areas of oversight.
- Coordinating the development, administration, and processing of the "climate assessment" in areas of oversight and implementation of recommended actions based upon it.
- Providing support to leadership advocating for regulatory reform impacting key areas of the University's operations, including, Student Financial Services, State Approvals, Risk Management, Internal Audit, Title IX, and Athletics

ORGANIZATION AND COMPLIANCE PARTNERS

The SVP of University Compliance serves as the chief officer for University-wide compliance efforts as described in the standards of [*Effective Compliance and Ethics Programs*](#). The SVP reports to the President of the University. The Executive Director of University Compliance reports to the SVP and, assists in the hiring and training of University Compliance Staff members.

As all employees of the University share responsibility for maintaining an environment of accountability and integrity, University Compliance will work with other departments to create and implement a comprehensive compliance program.

As a team, University Compliance will develop and oversee the University Compliance Council which is comprised of compliance representatives with multiple compliance touchpoints throughout the University. Members of the Compliance Council will be assigned by the President and/or Executive Leadership to ensure all areas of compliance are accurately represented.

The University Compliance Council will be responsible for:

- **Developing appropriate policies and procedures to meet compliance standards.**
- **Providing education to the University on compliance risks, as applicable to each department.**
- **Maintaining documentation related to compliance measures created and implemented.**
- **Recommending corrective action for areas not meeting compliance standards or ethical expectations.**
- **Submitting required reports as it pertains to compliance oversight and reporting of violations.**

PROFESSIONALISM

The objective of University Compliance is to establish and promote an effective compliance program as outlined in the U.S. Sentencing Guidelines for administering an [Effective Compliance and Ethics Program](#). University Compliance will strive to follow the seven elements of an effective compliance program, outlined below, ensuring compliance standards and procedures are in place to prevent and detect criminal activity, and to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

1. **Policies and Procedures:** Implementation of written policies and procedures to promote operational excellence through ethical behavior and to prevent criminal conduct. University Compliance, with advice from the Office of Legal Affairs, shall adopt policies and procedures designed to ensure University Compliance staff do not engage in the unauthorized practice of law.
2. **Oversight:** Leadership oversight will be fulfilled by the SVP with periodic reporting responsibilities to the Chair of the Audit Committee and/or the Board of Trustees. Individuals with operational responsibility within University Compliance will report matters relating to the compliance program to the Senior Vice President of University Compliance.
3. **Governance:** Due care will be given in the selection of personnel and the delegation of substantial discretionary authority to not include, to the best of our knowledge, individuals with a known history of illegal activities or other conduct inconsistent with an effective compliance and ethics program.
4. **Training and Awareness:** Effective and consistent training will be provided to employees at all levels, and in a practical manner, communication of expectations of high ethical standards and adherence to policies, procedures, and other aspects of ethics and compliance.
5. **Monitoring:** Regular monitoring will be completed to ensure that compliance standards are being maintained, and to allow for detection of noncompliant conduct. Avenues for individuals to seek guidance or report potential noncompliant conduct without fear of retaliation will be promoted.
6. **Enforcement:** Disciplinary actions and consequences for noncompliance will be consistently enforced in accordance with Liberty's Code of Business Conduct.
7. **Response:** Appropriate responses to noncompliance will include measures to prevent further instances of noncompliance. Necessary improvements will be made to reduce the risk of future noncompliance and outreach will be completed to re-align organizational culture as needed. Additionally, University Compliance will work in conjunction with Human Resources to ensure employees maintain ethical standards as set forth in University policy through the [Employee Handbook](#):
 - Code of Business Conduct
 - Conflict of Interest and Commitment
 - University Ethics

Policy Rationale: This Charter defines the mission, authority, independence, and principal responsibilities of the Office of University Compliance (“University Compliance”) at Liberty University (“Liberty” or “University”).

Definition of Glossary Terms: None Specified

Attachment(s): None

Procedural Information

Procedures:

COMPLIANCE MATRIX FOR REPORTING AND MONITORING

University Compliance will create and implement a tool, commonly referred to as a compliance matrix, that will enhance the University’s ability to have centralized oversight in a decentralized environment. The matrix will designate content experts to serve as compliance partners who will understand and report on specific regulatory issues that affect the operations of the University. The compliance matrix will connect personnel throughout the University to coordinate compliance as well as to identify members of the University Compliance Council. The compliance matrix will be used as a guide for consistent monitoring and annual reporting as needed.

Sanctions: Violations of this policy will result in disciplinary action, up to and including termination.

Exceptions: None

Initial Approval Date:

03/26/2024

Date of Last Approval:

03/26/2024

Review Cycle (Must be within three years of the date of last approval.):

03/26/2027

Related Policies: None Specified

Administrative Information

Responsible Oversight Executive:

Senior Vice President of University Compliance

Contact Office:

<https://www.liberty.edu/university-compliance/>

Permission Level:

Public