Building and Managing Successful Compliance and Ethics Programs - A Tale of Three Institutions

Facilitator

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Panelists

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Agenda

• Addressing challenges in building, managing and maintaining effective compliance and ethics programs
  • Montgomery College
  • The Catholic University of America
  • George Mason University
• Panelist Q&A
• Audience Q&A
Montgomery College

Established in 2012

Title IX Compliance Added in 2016
Protection of Minors Added in 2016
Internal Audit Added in 2016
Code of Ethics Added in 2017
MD State Ethics Commission Reporting Added in 2015
ADA Compliance Added in 2013
Points to Consider
To Build and Strengthen Compliance

- Organization: Decentralized v. Centralized
- Determine Who Does What
- Reporting Lines
- Relationship to Counsel, Risk Management, Others?
- Role of the Board of Trustees
- Committee Structure

Navigate the Sticking Points

- Know your Institution
- Get Compliance at the Table
- Define Roles
- Doing v. Oversight
- Issue Escalation
- Keeping the Message Fresh; Getting Heard
Compliance and Ethics Program Implementation - Overview

Commit

Assess
(Risks and Gaps)

Define
( Strategies, Policies and Controls)

Implement
( Strategies, Policies and Controls)

Communicate & Train
( Strategies, Policies and Controls)

Measure/ Monitor/ Improve
( Progress)

Report
(Senior Staff/Board)
Assess

Existing Elements

Missing Elements

Partners and Champions

Culture

Risks

• Assess
  • A word about “Compliance Partners”
The Catholic University of America

Compliance and Ethics Program Implementation - Detail

Define and Implement

- Missing Policies
- Helpline and Investigative Process
- Compliance Training
- Risk Assessments

The Catholic University of America

Compliance and Ethics Program Implementation - Detail

Communicate and Train

- Common and High Risks
- Policies
- People who can help
Measure and Monitor

• Regulatory Risk Assessments
• Targeted Compliance Assessments
• Metrics
George Mason University

- Institutional Profile
  - Mason as large and fast growing
  - Compliance infrastructure hasn’t caught up with how complex we are

- Organizational culture
  - “Wild Wild West”
  - Bottom up “brick by brick”

- VA Ethics Laws

- Decentralization
  - How do we remain compliant while not stifling innovation?

- Resources constraints
• Creating an ethics and compliance culture: Compliance needs to be everyone’s responsibility

Enterprise Risk Management—process

• Enterprise risk scoring
• Determination of risk ownership
• Abatement plan and resource allocation