

# 16.01 System Ethics and Compliance Program

Approved May 4, 2012 (MO 110-2012)  
Revised January 30, 2014 (MO -2014)  
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## Policy Statement

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The Board of Regents (board) of The Texas A&M University System (system) is committed to the highest standards of integrity in all areas of ethics and compliance and resolves that such activities undertaken by system faculty, staff and students should be conducted in accordance with strict ethical principles and in compliance with federal and state laws and regulations, system standards and other applicable requirements.

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## Reason for Policy

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This policy provides a framework for (a) achieving the highest level of compliance with applicable ethical, legal, regulatory and system standards and requirements performed within the system, and (b) promoting an organizational culture that encourages ethical conduct and a commitment to compliance with federal and state laws and regulations, system standards and other applicable requirements.

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## Procedures and Responsibilities

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### 1. SYSTEM ETHICS AND COMPLIANCE PROGRAM

The chancellor shall appoint a system ethics and compliance officer (SECO). The SECO shall be responsible for working with other system offices and members to establish and maintain an effective, system-wide ethics and compliance program, coordinating ethics and compliance activities within the system and reporting to the general counsel with access to the chancellor and to the board through the audit committee regarding the status of such activities. The SECO shall undertake the following activities:

- (a) Develop, implement and monitor the system-wide ethics and compliance program;
- (b) Assist in the development, implementation and/or monitoring of each member's ethics and compliance plan;
- (c) Develop or enhance ethics and compliance education and training opportunities throughout the system;
- (d) Serve as a source of ethics and compliance information for employees, management and the System Internal Audit Department;

- (e) Assist member ethics and compliance officers and functionally responsible offices in overcoming barriers to achieve the highest level of ethics and compliance;
- (f) Collaborate with members to develop innovative and effective ways to mitigate ethics and compliance risks;
- (g) Identify risks and make recommendations for policies, regulations and rules, in consultation with the system Ethics and Compliance Committee (Committee); and
- (h) Refer ethics and compliance matters to the general counsel and/or internal auditor for investigation, as appropriate.

## 2. SYSTEM ETHICS AND COMPLIANCE COMMITTEE

A Committee shall be formed and be comprised of the chancellor, the chancellor's executive committee, the general counsel, the chief auditor and the SECO. The chancellor shall chair the Committee and the SECO shall serve as vice chair.

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### **Related Statutes, Policies, or Requirements**

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[Tex. Educ. Code § 51.971, Compliance Program](#)

[Federal Sentencing Guidelines Manual, Chapter 8, Part B2, Effective Compliance and Ethics Program](#)

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### **Definitions**

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Ethics and compliance program – a process to assess and ensure compliance by the officers and employees of the system or a member with applicable laws, rules, regulations and policies, including matters of ethics and standards of conduct; financial reporting; internal accounting controls; or auditing. *See* Tex. Educ. Code § 51.971(a)(1).

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### **Member Rule Requirements**

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A rule is not required to supplement this policy.

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### **Contact Office**

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