

CES COMPLIANCE HOTLINE PROCEDURES

Objective

The objective of the compliance hotline is to provide a confidential way for employees to obtain information about compliance issues and report instances of suspected noncompliance outside the normal chain of command in a manner that preserves confidentiality and assures non-retaliation. Employees should use the hotline when they are not satisfied with their supervisors' response to a compliance issue, or if they fear retaliation by their supervisors. Under normal circumstances, compliance issues should be addressed through normal administrative channels.

Examples of campus activities and operations in which non-compliance may be an issue include the following:

- Financial reporting irregularities;
- Fraud;
- Various institution policies and procedures;
- Local, state, or federal laws and regulations,
- Grant or gift restrictions;
- Safety policies and procedures;
- NCAA guidelines;
- Conflict of interest and ethics policies;
- Computer security;
- IRS regulations;
- Equal Employment Opportunity laws; and,
- Sexual harassment policies.

Complaints

The compliance hotline is **not** a complaint hotline. Only matters involving compliance with a CES institution policy or procedure, or a federal or state law or regulation, will be investigated. Employees with other complaints will be advised to pursue normal administrative channels.

Supervision of Hotline

To insure anonymity, your institution has contracted with EthicsPoint, an outside service provider, to manage its compliance hotline. Upon receipt of a call, EthicsPoint forwards the information to the respective institution's compliance officer who will consult with the Office of General Counsel and determine an appropriate response.

Confidentiality

Employees who call the compliance hotline may remain anonymous. If the person requests anonymity, no attempt will be made to identify the employee. Information provided by the employee will be treated as confidential and privileged to the extent permitted by applicable law (see Protection for Report).

Note: Depending on the allegation, maintaining strict anonymity may make the arrest, charging, and/or prosecution of the perpetrator impossible.

Non-retaliation

Employees who call the hotline will not be retaliated against. After placing a hotline call, if an employee perceives that he or she is being retaliated against, the employee will be referred to the appropriate administrative procedure.

Investigation Procedures

After the compliance officer receives the information regarding the hotline call from EthicsPoint, the compliance officer will consult with the Office of General Counsel and determine the appropriate disposition of the issue.

Resolution

All hotline compliance issues will be resolved as quickly as possible. Employees who call the hotline will be given a code number and asked to call back in approximately two weeks to receive an update on actions taken to date. The compliance officer can also utilize this mechanism to communicate additional questions to callers who prefer to remain anonymous. Confidential information obtained during the investigation will not be disclosed to the employee. After the compliance officer is satisfied with the resolution of the issue, documents pertaining to the call will not be retained.

Role of Legal Counsel

The Office of General Counsel will consult with the institution's compliance officer regarding the propriety of response to each issue identified through the hotline.

Compliance Officer's Hotline Responsibilities

- 1) Ensure the issue is recorded on the hotline log.
- 2) Coordinate a meeting with General Counsel to discuss appropriate disposition.
- 3) Record disposition on the hotline log.
- 4) If the compliance officer agrees that the issue is minor, refer the matter to the appropriate department head for resolution. Ask the department head to call with a status report.
- 5) If the compliance officer agrees that the issue is major, report the matter to the appropriate officials, who may include the President, and seek appropriate guidance.
- 6) If the issue is an alleged fraud, follow the institution's fraud policy.
- 7) Ensure the security and confidentiality of the hotline log and supporting documentation.