



ASSOCIATION OF AMERICAN MEDICAL COLLEGES

Policy Title: Compliance Reporting Policy	
February 12, 2018	Policy Owner: Chief Legal Officer
Next Review Date: February 2020	Approved By: Board of Directors Audit Committee

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I. Scope and Purpose

This policy covers the reporting of financial and other compliance matters, including matters involving internal auditing controls, auditing procedures, potential violations of applicable laws, rules, regulations, or the AAMC’s codes, policies, procedures, or any other unethical behavior occurring at the AAMC.

This policy is not intended to cover reports regarding AAMC member institutions.

The purposes of this policy are to:

- Facilitate the reporting of violations of law or AAMC policies; and
- Protect employees from retaliation for making good faith, truthful complaints, reports, or concerns regarding financial and other compliance matters.

II. Roles and Responsibilities

Responsible – The Chief Legal Officer is responsible for reviewing and updating this policy, and for securing approval by the Board of Directors (or authorized Board committee), and for coordinating management follow-up on reports. The Senior

Director, Internal Audit, is responsible for real-time monitoring of incoming reports to provide the Audit Committee with an independent assessment as requested.

Accountable – Chiefs are accountable for ensuring this policy is followed within each work unit.

Consulted – Finance, Internal Audit and Human Resources are consulted to ensure this policy fits their needs and requirements.

Informed – All employees

All individuals informed of this policy have the responsibility to:

Read: the policy and give careful attention to those subjects that most pertain to your job duties.

Understand: the purpose of this policy and your overall responsibilities for standards of business conduct.

Consult: your supervisor, Legal, Finance, Human Resources, or Internal Audit for additional clarification of this policy.

III. Policy

The Association of American Medical Colleges (AAMC) is committed to complying with all applicable laws, regulations, accounting standards, accounting controls, and audit practices and to providing its employees with a work environment that promotes honest and ethical conduct. Any person may submit what he or she believes is a truthful complaint, report or concern regarding financial, accounting, auditing, ethical or legal compliance matters relating to the AAMC without fear of dismissal or retaliation of any kind.

IV. Related Standards/Guidelines/Procedures

AAMC Compliance Reporting Procedures
AAMC Standards of Conduct/Discipline

V. Related Policies

AAMC Policy on Resolving Allegations of Research Misconduct
AAMC Anti-Harassment Policy
AAMC Employee Discipline, Probation and Termination Policy

VI. Definitions

None

VII. Revision History

Date	Approved By
January 30, 2008	Leadership Team
December 9, 2013	Leadership Team
June 3, 2014	Board of Directors Audit Committee
June 13, 2016	Board of Directors Audit Committee
February 12, 2018	Board of Directors Audit Committee

VIII. Exhibits

None