

Prairie View A&M University

- Second oldest public institution of higher education in Texas established in 1876
- An HBCU
- Part of the Texas A&M University System
- Over 9,000 students
- Over 1,200 employees



Course Objectives

- Why "building a culture of compliance" was the approach taken to change and improve the university's overall compliance environment.
- Factors that assisted in successes towards changing the compliance culture and factors that distracted from the university making progress.
- Lessons learned by the Office of University Compliance during the first two years of our "building a culture of compliance" journey.

History of Compliance Program at PVAMU	
Started in early 2000's to address many audit issues	
Was the CFO's eyes and ears	
Investigated hotline reports	-
Conducted compliance reviews and made recommendations	
Provided trainings to campus community	
Facilitated the university's policy development process	
Compliance Program Required by Policy	
In 2012, the A&M System Board of Regents passed an Ethics and Compliance policy that required:	
Each member of the A&M System to establish and maintain an effective compliance program, appoint a compliance officer, implement a compliance plan, and establish a member compliance committee.	
The compliance committee shall meet quarterly to address mitigation of risk, to provide appropriate resources for compliance and to ensure appropriate action for noncompliance issues.	
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"Building a Culture of Compliance" - Why is that Important?	
"Because CULTURE determines what we actually do"	
DVAMIL has planty of policies, directives, quidalines, precedures, audita, ata abata	
PVAMU has plenty of policies, directives, guidelines, procedures, audits, etc. that tells its employees and students "what to do." The PVAMU culture determines what we "actually do."	

When We Started This Journey	
Recount the Auditor said to Becount the Auditor said to Audito	
1, 14, 1	
What Did We See and Hear About Compliance	
"Because the auditor said so" Limited communication between divisions	
Backlog of outdated rules and university procedures Avoid change	
Lack of accountability Check a box mentality	
Leadership and operational ananagement – not in sync on what is really happening	
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First Steps in the Journey	
Get university rules and procedures updated and current	
Get outstanding audit recommendations implemented	
Continue to provide training	
Define mission and goals of the office	
Change perception as a secondary audit shop	
Build relationships	

Successes Along Our Journey



Compl	ance Matters OFFICE OF UNIVERSITY COMPLIANCE QUARTERLY NEWSLETTER
Visit vis at http://www.poamu.edu university.compilance/	The section property is the Office of trainmary Compliance and is noteded to proceed you with current for information compliance and in strended to proceed you with current references about updates places and procedure, being with compliance and extend from a contract company, and Ask Our Vice President! Ask Our Vice President Michael McTataser. "How does PVAMM work to empower studients, it scully and staff to do the right."
INSIDE THIS ISSUE:	Proint Van AM Uneversity PVAR(I) is committed to providing educational registrators, connectiveness registrators and dedicated services that promote educis, integrity and empower students, facility and add till to the right flows, themselved of the PVAR(I) and studies which shape the vision, the culture and informs the analysis, actions and deads of community members, include: Access and Opportunity, Overview, Candership, Releasing, and Social Responsibility.
Compliance Across 3 Campus	Students, faculty and staff at PVAMU are also admonished to adhere to the established Codes of Conduct found in their respective handbooks. Furthermore, there are federal, state, and system rules, laws, policies, and guidelines that establish the protocols for processes and procedures in the learning and work environment.
Moral Courage & 'Do 4 The Right Thing'	Through specific acidemic offerings and more than 100 registered student organizations, students at PUAMI have the opportunity to enhance their Antologides, skills, and competencies in confirmemications, confirm resolution, design and setting, problem solving, and personal/professional enquette. Faculty and staff, through professional organizations, and confirmed activations of the confirmed setting and staff, through professional organizations are confirmed to the confirmed activation in faculty discrete, satisfacting professional organizations.
AVM	Based on the aforementioned programs and services, a solid foundation to promote "during the right thing" at PUAMS in place. This foundation has been established over one hundred and forly one over history of the institution. However, beyond the established foundation, if we truly want to empower students, faculty and staff to do the right thing, they must be challenged to be guided by their conscience. Why is this important?
NEED TO REACH	Our conscience is that internal guide that helps us to be ethically and morally sound. Our conscience helps us to analyze and evaluate all that we have done, are doing, and intend to do and provides an assessment as to whether our action are proper.
936-261-2144	Dr. Martin Luther Kiep, Jr. once stated. "On some positions, cowardice asks the question, is it expedience rooms along and asks the question, in positier? Voranty asks the question, in grouplar? Conscience asks the question, is it rejebt? There comes a time when one must take the position that is neither safe, nor politic, nor popular, but he must do it because conscience tests him it is right?
WR BANKS BUILDING SUITE #224	This year commemorates the 50° year anniversary of the assassination of Dr. Martin Luther King Jr. He was committed to living a purposeful life in service to humanity. His life is an example for all to view and emulate in terms of deing the right him. Dr. King, without fear of the consequences to his own life, was contentious about

Policy Central Roley Certar brongs awareness to the University Community about new and updated University wide policies is guidelines. Each recordance will cover any significant new and mericand University wide policies. Significant new and mericand University policies. Stated solvine on the first is new or exhault applies in the contraction of the properties between the properties of the properties of the University Projectors. An approvine wave whether between prompt and March 7016 and the updated version one policies in the YAAD International Effective (VIII.2016). States Anticisis: 01.03 Agenchina Deser and Imens and Conditions of Employment (Street VIII.2016). 10.03 Assembly Contraction (Street VIII.2016). 10.04 Assembly Contraction (Street VIII.2016). 10.05 Assembly Contract

Athletics. Compliance We would like to educate of of our stoken; staff and faculty mem- bers on the Preferential Treatment's Late Rendit as a relates to the	
NCAA Rules and Regulations: There is a difference between extra benefits and preferential treatment? Compliance Across	
The grothsion of extra benefits involves institutional staff members or bosoners. Thereforeted in transment occurs when institution does not have leaved to the leaved to the forest the transment, benefits or survices being recorded to the	
individual	
can have some free time on one of the indicor courts during the Christmas holiday. The couche arranges for Carp to this buils free of charge. This coun- try club offers student, discount rates throughout the year. A test of the Timely Warrang System and Emergency Notification System	
Yes, other college students are not able to play for free. They pay a dis- counted rate.	
Is this an extra benefit or preferential treatment? This arrangement is in extra benefit because of the couch's involvement. Would this agreement will be a violated if the couch's was not in	
Would the arrangement stat or a violation in the coars was not as violation. Yes, the violation would be preferential treatment. Contact: Vanessa Wright (pranipht@puamu edu)	
NCAR hydro: 12.1.2.1.6 Preferential Treatment, Renefits or Services. Preferential treatment, benefits or services because of the nelvidoud's alsh TDo The Right Thing!	
less such treatment, benefits or services are specifically permitted under NCAA legislation.	
ACAA glame: 16.02.3 Extra Breefit. An extra benefit is any special arrangement by an institutional employer or a processor control of the ministration, shallocis interests to provide a tradent. a representation of the ministration, whiteirs interests to provide a tradent. conduct, hazassment or discussmentation, the encourage you to report such	
a representation of the mentioners, shifteness reserved to provide a student pathons or the tension students; resistors or forest because the students allowed on the students in resistors of the besident on excepting the students or forest to except the students of the students. Students or of forest in core of students of the Act Seguitions of its demand- sured when the same beautiful particular of the students of the students. Students or the students are students as the students of the	-
body (e.g., foreign students, minority students) determined on a basis unre- lated to athletics ability. week. Reports can be submitted anonymously, and will be forwarded to the appropriate institution or agency official for action.	
Contacts Britishey Johnson (Begichnoordifysamu edu) & Christina Ross Citrosoffysamu edu) PAGE 1	· · ·
Why Is The World So Lacking In Moral Courage?	
By Michael Shaub, Professor Texas AEM University: See Full Article—http://mays.tamu.edu/ethicu/ Why do we scraitch unrebads and say. "You did Diymolic gymnatics doctor Larry Nasion get away with this morehly repugnant and abusive habiturist for so lone?" "Why did larged senative more larges withouth's reventions habitary and kell senatives that if collistria is?"	
behavior for so lang?" "This did people enable movie mogal flavery Welnichin's agregious behavior, not just ipsoring it. but facilitating it" "Why did no one speak up when the police from my home town. Bottlimore, alregidar carried around language and 88 gent to pirat on people they happened to shoot!" Morai courage it has willingnes to take a potentially costly most of comingly become it is you do up to did	
so, or "the right things to do." It is acting in spile of the personal consequences because of the harm that can be prevented or good provided to others. Moral coursage is what hums moral judgment into moral action. We make moral decisions based on duties and consequences. When people are condemned for their moral decisions, it is target; because they did not recognize duties or because they miscalculated.	
consequences to themselves and others What steps us Two of the primary inhibitors of moral courage are the fear of consequences and misplaced duffer. The first inhibitor is obvious, but fear of	
consequences may inhibit imatel action even by those who actually recognize utiles. The second inhibitor is often underestimated. Duty to a team, a friend, or a course may revent someone form acting who is morally revealout a situation. This behavior is evident in reter-	
spect for most sexual assupt scondain acound college athletic feam. It seems inequipose that fearmostes who are not even engaged in the behavior not only fall to report it, but stand by while it is happening right in found of them or in the next room. As this behavior is treated as normal on college composes, and not just with athleties, morel covarge is short-decolled.	
Two of the primary enables of moral courage are exemption and express permission provided by influential people. The Olympic gymnostics scondal is a classic example of how the floodgates of moral courage can be opened if one or two peoples step out and control exemptions behavior. The sentencing phase of larger island rain of a set set of women able to exerce their feelings of people interest and many instant's false consisted of a set of or women able to exerce their feelings of people interest and many instant's false consisted of a set of or women able to exerce their feelings of people interest and many instant is set.	
bring to the light the massive harm caused by someone they trusted. This happens in the business world when whistleblowers like Cynthia Cooper at World-Com reviewal what is again an in a corporation to milited financial statement users, despite consequences.	
What we are let in thequestly, it is either empowering face for moral courage—expense permission to speak on against moral emoral, but in power are neckloshed to gash this permission, even when the yell remains were an end reappeal to his bot abritable, because of the successfully of the corresponders that can active from empowering alternal. Fravoir wrong has been burked for a long film, revealing if con result in againly multiplied grant on an agregation, as belond. All, organizations and frincings fasted belonding the like injuried relief position of the internal control in the gload relief and, in this gload relief and, it is the gload relief and, and	
not just the consequences to an individual, that can make a leader heilfate, or a whistleblower reluctant to speak. A wise leader confinually probes the organization with professionally skeptical questions, rather than just believing assertions about performance.	
monce. This can be done with moral issues a very gauging the arganization's potential exposure to everything from a braziment will to britisery alegations. Finding things early in a title like letting the air slowly out of a balloon rather than having to pop it lates. A wise leader min- tries the need for significant moral courage in the organization by proactively searching out potentially systemctions between.	
In the end, moral courage is an individual decision, and it is rare. We do well to minimize the situations in which it is necessary. We do better to act intentionally to enable moral courage when it is required.	
Trainings	
Compliance Week	
"Compliance Carnival"	
"Compliance Tailgate"	
New Employee Orientation	
– "Building a Culture of Compliance – Why Should We Care"	

Compliance Champion Contest Compliance Champion Trophy • Submit application to Compliance Office Application review Champion selected and announced to campus community Tone at the Top Shift · Leadership changes at president and provost positions Emphasis on ethics and integrity President Executive Committee is the University Compliance Committee Emphasis on students and faculty **Policy, Audit and Communication Changes** · University rules and procedures up-to-date and less restrictive Follow-up audits resulted in no "repeat findings" Subject matter expert list published and communicated to the campus community Multiple venues for communicating compliance information – PV Place, faculty folders

Missteps Along the Way Where We Still Have Challenges Communication issues Holding meetings and making decisions without ALL parties present Disconnect between upper and middle management • Lack of ownership/accountability • Misuse of anonymous hotline reporting system and investigative processes Where Are We Today The same

same

old

old

thinking

What Are We Doing • Building relationships and helping to solve problems · Are consultants instead of auditors Keeping compliance issues in the forefront • Improving the effectiveness of the university compliance committee • Training employees on why a "culture of compliance" is important What Are We Doing • Asking for peer commitment – peers support one another in doing the right thing Asking for employees to embed ethical values into their daily activities • Expect violations to be reported and hold violators accountable Recognize and reward those that do the right thing Where Do We Want to be in the Future

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Where Do We Want to be in the Future	
More consistent and defined investigation program	
Better management monitoring processes	
More effective training programs for all compliance areas	
More effective lines of communication	-
Stronger accountability with enforcement, discipline and incentives	
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What Are We Doing To Get There	
Involving the President	
Working on relationships and building trust Creating better tools and processes for the campus community	
Developing knowledge and expertise	
Recommending software/technology solutions Being more transparent in communications and sharing of information	_
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