



***Office of Compliance, Risk,
and Ethics Program Report***

***January 2017 –
December 2017***



MC

**MONTGOMERY
COLLEGE**

Table of Contents

Table of Contents

Executive Summary	2
Higher Education Trends in Compliance and Risk Management	3
Compliance	5
Americans with Disabilities Act (ADA) & Section 504 of the Rehabilitation Act of 1973	6
Title IX.....	7
Protection of Minors	8
Internal Audit	9
Maryland State Ethics Commission Reporting	9
Code of Ethics and Standards of Conduct.....	10
Compliance, Risk, and Ethics Program Master Plan.....	11
Specific Program Goals	11
Program Goals for Regulatory Compliance	11
Program Goals for Enterprise Risk Management	11
Program Goals for Ethics	11
Program Goals for Internal Audit	12
Compliance Risk Report and Progress	12
Compliance, Risk, and Ethics Office Outreach, Training, and Professional Development	13
College Student Compliance Training	13
College Employee Required Compliance Training	13
Compliance and Ethics Awareness Week.....	14
Compliance, Risk, and Ethics Office Outreach and Professional Development	16
Conclusion	18

Executive Summary

The Office of Compliance, Risk, and Ethics is responsible at Montgomery College for:

- Oversight, monitoring, and coordination of regulatory compliance including applicable county, state, and federal laws, regulations, and other requirements;
- Development, implementation, and management of an Employee Code of Ethics and Standards of Conduct Program;
- Response and case management of the College third-party reporting line;
- Development and implementation of an Enterprise Risk Management Program;
- Internal Audit;
- Americans with Disabilities Compliance for Students;
- Title IX Compliance;
- Youth Protection Program; and
- Maryland State Ethics Commission Financial Disclosure Reporting.

Higher education is facing increasing pressure to both perform and be relevant. The pressures to perform are diverse and wide-ranging including: declining enrollment, student completion rates, rising tuition and fees, increasing competition from other education providers, student safety, and the changing landscape of higher education regulatory compliance. The future of Federal laws and regulations are uncertain with new leadership at the Department of Education. The State of Maryland has enacted an increasing number of bills affecting higher education. All of these challenges are demanding, and considered more so when balanced with the reality of flat or declining county and state financial support.

As colleges face increasing pressures, a reasonable response is for more proactive, effective risk management. Institutions benefit from diminishing negative risk and inviting positive risk. In doing so, institutions increase their chances of achieving mission and goals. A trend exists for risk management practices conducted in more deliberate and thoughtful ways across college campuses. Enterprise risk management practices, once thought reserved for large corporations, are now used in higher education for the same purposes as any organization – to increase the odds of success.

As Montgomery College was forward thinking in the decision to create a compliance office in 2012, the College has also been forward thinking in the plans for an enterprise approach to risk management. There is substantial opportunity in the coalescing of risk oversight functions in one area at the College. Internal audit functions as an additional level of oversight to both the routine management oversight and compliance monitoring. Coalescing risk functions places a greater institutional emphasis on risk management to help respond to the mounting pressures for institutions to perform and be relevant.

The Office of Compliance, Risk, and Ethics reports compliance risk through a compliance watch list. The watch list identifies higher than acceptable compliance risk to encourage institutional focus to reduce the risk levels. The Maryland State Heroin and Opioid Education and Community Action Act was the sole new item added to the watch list in 2017. The bill was added during summer 2017 as a high probability, high impact risk potential. However, by October, the risk level was reduced to medium probability and medium impact risk level.

During 2017, the following risks were reduced to a lower risk level but remained on the watch list: emergency notifications, Clery Act, and Title IX athletics compliance. The following risks were removed from the watch list after having been reduced to a risk level that was acceptable to the college: gainful employment, protection of minors, and copyright. It is important to note there were no risk items on the watch list that increased in risk level during the year.

Outreach, training, and awareness is a critical component of any compliance and risk management program. Collegewide compliance newsletters, *Compliance Matters*, are developed and distributed each fall and spring semester. The newsletter covers the areas of higher risk compliance, and provides guidance and information relevant to the compliance risks at Montgomery College. In addition to online and face-to-face training, the office organizes an annual compliance fair on each of the three campuses in honor of National Compliance Week. In 2017, the Office of Compliance, Risk, and Ethics staff engaged in 411 hours of professional development. Other online compliance trainings are available through the College's MC Learn portal. In 2017, 1118 College employees attended compliance awareness and training presentations, predominantly in the areas of Title IX and ethics.

An essential piece of any compliance program is to establish and maintain effective policies. This year, the Office of Compliance, Risk, and Ethics supported the development and passing of the Policy and Procedure [31000–Code of Ethics and Employee Conduct](#), as well as an update to the Policy and Procedure [75005–Protection of Minors](#). An Employee Services Council ad hoc committee led the employee code of ethics through the College governance structure. The President accepted a recommendation from the committee to implement an employee code of ethics and directed the Office of Compliance, Risk, and Ethics to implement an employee code of ethics program.

Higher Education Trends in Compliance and Risk Management

Over the past decade, colleges and universities saw the rise of regulations governing higher education and the serious consequences from lapses or lack of oversight to the law. The trend in the rise of regulations was due to a number of factors including: concern surrounding the viability of for-profit schools, rising cost of an education, government oversight and protection of students as consumers, increase of online learning programs, and concern over students' physical safety on campuses. In response to the increased regulations and enforcement, many compliance programs at colleges and universities were established and expanded. In addition to compliance programs, schools responded through the passing of internal policies and procedures to help clarify internal processes and effectively abide by the mounting regulations.

In 2017, the incoming US President and Administration considered the past decade of increased regulations and the effects, including the impact on higher education. The US Department of Education communicated its intention to review the expectations surrounding Title IX, Electronic Accessibility, Higher Education Opportunity Act, and the Clery Act. The higher education community has received or is expecting new guidance in many of the regulations established over the past decade, resulting in a level of uncertainty in future expectations. Many colleges are proceeding slowly to change, taking a cautious approach, until more direction is clear. Some colleges have chosen to uphold the policies they put in place to align with the regulations of the last decade or longer, as long as they do not negate the newly revised federal

regulations. As compliance programs require valuable time and resources, schools may choose to hold on changing direction until new guidance and implications are clear.

Concurrent with the rise of federal regulations, the State of Maryland also passed regulations that govern State public institutions of higher education. The State regulations have included protection from gender discrimination, college completion, voter registration, and drug addiction prevention. As federal regulations potentially change, the College must navigate the changes at the federal level with consideration of the State laws we are required to uphold.

The Office of Compliance, Risk, and Ethics



Figure 1: Office of Compliance, Risks, and Ethics Responsibilities

The Office of Compliance, Risk, and Ethics has steadily broadened its areas of responsibility since its inception as an office in 2012. The functions coalesce around risk management and oversight. Combining the collective risk functions in one area of the College reflects a trend in higher education as colleges and universities strive to more effectively diminish risks and increase the opportunities to achieve organizational goals.

The Office of Compliance, Risk, and Ethics reports directly to President DeRionne Pollard. The placement of the compliance function reporting to the chief executive of the organization is consistent with the Federal Sentencing Guidelines and promotes an independent and empowered oversight function. The office has a dotted line to the Audit Subcommittee of the Montgomery College Board of Trustees, a relationship established in 2017.

The office consists of Vicki Duggan, chief compliance, risk, and ethics officer; an executive associate (vacant), Maria Davidson, associate compliance specialist; Julie Foster Martorana, compliance specialist and project manager; Christopher Moy, director of ADA compliance and Title IX coordinator; Kristen Roe, youth protection coordinator and deputy Title IX coordinator; and Goli Trump, internal audit and advisory services director.

Compliance

The Office of Compliance, Risk, and Ethics provides oversight of institutional regulatory compliance efforts by working with compliance risk owners across all college units. In collaboration with College compliance risk owners and with the General Counsel, for legal advice and guidance, the Office of Compliance, Risk, and Ethics works to assure compliance requirements are being adhered to by the institution. This is done by tracking the applicable laws, interpreting the legal requirements with the assistance of General Counsel, identifying the responsible individuals within the College who fulfill the compliance requirements, clarifying expectations among the responsible parties, and assuring the requirements are fulfilled. There is also a strong education and awareness component to the compliance program with ongoing efforts to provide training and information necessary to maintain awareness of the law to raise the institutional level of compliance of all employees. The office works diligently to track changes to laws and regulations, observe trends in enforcement of the laws among our peer institutions, and provide solutions to the College used successfully by other colleges.

In addition to the federal laws, the past couple of years have seen an increase in the bills regulating higher education passed by the State of Maryland. These include the Heroin and Opioid Education and Community Action Act of 2017, the Freedom to Vote Act of 2016, and Institutions of Higher Education – Sexual Assault Policy and Survey. Each of these Bills regulate an area with existing federal oversight in place. We respond to both the federal and state laws, comparing the requirements, to meet both as efficiently as possible.

Montgomery College is preparing for the Middle States Self Study reaccreditation in spring 2018. Part of the reaccreditation process includes the submission of a compliance report, the Verification of Compliance with Accreditation-Relevant Federal Regulations Report. The Office of Compliance, Risk, and Ethics led a College workgroup to develop the report for the Board of Trustees to review and approve submission to Middle States Commission on Higher Education. Part of the workgroup charge was to assure that processes for students to bring complaints forward was clear and direct. The workgroup created a student complaint webpage and supporting processes for a more streamlined and efficient student complaint process.

The Office of Compliance, Risk, and Ethics identifies compliance risks multiple ways. New and changing laws are identified by information shared through Department of Education, the State of Maryland, professional associations, the College General Counsel, and through information shared from College compliance partners. The staff in the Office of Compliance, Risk, and Ethics attend professional conferences and engage in ongoing professional development to stay

current in their fields. As we become aware of new or changed compliance requirements, the office evaluates and puts in place plans to manage the requirement and any gaps to the compliance requirements. Specific compliance risk owners are our compliance partners and are the key to maintaining a compliant organization. The compliance partners fulfill the compliance requirements. The Office of Compliance, Risk, and Ethics helps to clarify the expectations and facilitate the responsible offices and individuals to fulfill the compliance requirements.

Compliance risks are monitored and reported using a prioritized report that ranks the College's current compliance risks on scales of impact and probability. Impact measures the scale of effect if the risk were to occur. Probability measures the likelihood that the risk will occur. Compliance risk mitigation efforts are focused on those risks ranked with the higher levels of both impact and probability.

The Office of Compliance, Risk, and Ethics team reviews College policies and procedures to assure alignment with current laws and regulations and to reflect best practices among leading institutions.

Americans with Disabilities Act (ADA) & Section 504 of the Rehabilitation Act of 1973

Montgomery College is committed to providing equal access to educational opportunities for students with disabilities. Montgomery College recognizes that individuals with disabilities may need reasonable accommodations to have equally effective opportunities to participate in or benefit from college educational programs, services, and activities. Montgomery College shall adhere to Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act (1990), ADAAA 2009, with respect to providing reasonable accommodations as necessary to afford equal access to our programs, goods, and services for qualified persons with disabilities.

Reaffirming our responsibility to comply with section 504 at 34 C.F.R. § 1.4.4(a), Montgomery College recognizes its obligations to provide adjustments to its academic requirements and educational auxiliary aids to qualified students with disabilities to ensure that they are not denied the benefits of or excluded from participation in the College's educational programs. MC further recognizes its obligation under Title II of the ADA that a public entity shall make reasonable modifications when necessary to avoid discrimination based on disability, unless it can demonstrate that making the modifications would fundamentally alter the program.

The Office of Compliance, Risk, and Ethics oversees the compliance of ADA and Section 504 to assure equal access to College goods, programs, and services. To ensure this access, the Office of Compliance, Risk, and Ethics, through the director of ADA compliance, has updated the College's Policy and Procedure [41002–Equal Education Opportunity Non-Discrimination](#) to reflect current regulations and best practices in the field.

Additionally, the Office of Compliance, Risk, and Ethics is collaborating with the Office of Information Technology to ensure the College's electronic information technology is accessible to all. In May 2016, the College passed a new policy governing IT Accessibility, Policy and Procedure [66004–Electronic Information Technology Accessibility](#). The policy provides definition and establishes expectations to what is expected of the College information accessibility. Support mechanisms are in place to guide College employees to assure accessibility of electronic information. The Office of Compliance, Risk, and Ethics will continue

to collaborate with both, the Office of Information Technology and Advancement and Community Engagement, to increase the overall percentage of accessible technology resources. Currently, instructional materials are captioned in support of a student's accommodations. A pilot project is being planned to caption additional instructional media resources, independent and proactive of a specific accommodation.

Title IX

Title IX of the Education Amendments of 1972 states that "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance..." 20 U.S.C. § 1681.

The College Title IX Coordinator, Christopher Moy, oversees compliance with Title IX law. Title IX protects students, faculty, and staff against gender based discrimination, including sexual misconduct and sexual violence. It addresses protections for pregnant and parenting students, including lactating mothers. Gender equity in athletics remains an additional area of focus within Title IX. Additional employees have been identified as deputy Title IX coordinators, including the three College deans of student affairs and the youth protection coordinator. The deputies work closely as a team with the Title IX coordinator in support of campus Title IX response; prevention and awareness; programming, and services to prevent gender bias.

The College's Title IX Advisory Committee, under the leadership of the Title IX Coordinator, meets twice a semester to provide guidance and support for the College's Title IX efforts. The Title IX Advisory Committee assists the Title IX coordinator with Title IX compliance efforts; provides the College with advice on promoting a campus culture of respect and responsibility, and in identifying and deploying effective measures to prevent and address sexual misconduct. The Title IX Advisory Committee is charged with the following:

- advise and guide on Title IX programmatic goals and ongoing development of the College sexual misconduct prevention program;
- identify the needs, issues, trends, and climate of campus around sex discrimination issues;
- develop, implement, and monitor approaches and efforts to address those needs;
- inform and provide feedback on Title IX policies, initiatives, programming, and materials;
- advise and guide on Title IX training for students and employees;
- serve as a resource on Title IX and sex discrimination issues for all campus constituents;
- provide oversight and quality assurance for sex discrimination reporting/response systems, and
- ensure Title IX related work is compliant and consistent with identified best practices.

The Title IX Advisory Committee is in its second year of participation in NASPA's Culture of Respect Collective. The Culture of Respect Collective is a comprehensive, evidence-based program to improve institutional efforts to prevent and respond to campus sexual violence.

Through the work of the Title IX Advisory Committee with the Culture of Respect Collective, the College has been able to identify and respond to key areas of our sexual misconduct response and prevention efforts. These areas include:

- Multitiered Education,
- Survivor Supports,
- Clear Policies,
- Public Disclosure,
- Schoolwide mobilization, and
- Ongoing Assessment

Over the next year, the Title IX Advisory Group will continue to engage in evaluation of current practices; development of an individual implementation plan focused on the above identified areas, and then evaluate progress made during the project period. The Culture of Respect Collective provides a framework to assess and improve efforts to eliminate campus sexual violence. Montgomery College is joining 40 other higher education institutions in the Collective as we answer the call to ensure students are safe and able to pursue the promise of higher education free from discrimination.

Protection of Minors

Each year, thousands of minors engage in programs and activities on Montgomery College campuses. The College is committed to providing a safe environment for minors who participate in College programs and activities. The Office of Compliance, Risk, and Ethics provides the oversight necessary to ensure the protection of minors on College campuses from abuse or neglect, including sexual abuse. A proactive approach to protecting minors on the College campuses requires prompt and effective response to suspicions of or observation of abuse or neglect. Education and awareness for College employees and volunteers for protecting minors is a critical part of this proactive approach.

In FY17, 84 programs serving more than 7,500 minors registered through the youth protection program. Each year the number of events and minors served increases, due to increased awareness of the Protection of Minors Policy and Procedure and the associated requirements.

In its third year of operation, the College's youth protection program maintains a registry of events involving minors, facilitates background screening for those who interact with minors, provides training on mandatory reporting of child maltreatment, and serves as the campus resource for youth protection concerns.

At the request of Dr. Pollard, the youth protection coordinator planned and executed the first College wide Take Our Daughters and Sons to Work Day Event. The event included three hours of programming on each of the main campuses. Parents/guardians were required to remain with their children throughout the event to ensure adequate supervision. More importantly, this structure allowed parents and children to engage in meaningful activities in career exploration and experience the offerings of Montgomery College.

The event included 50 child participants per campus; 150 total. Nearly all spaces were reserved. Participants ages 8-18 were invited to attend, but the vast majority of participants were between

the ages of 10-12 years old. Employees also had the option of bringing a child to work without participating in the structured program. Evaluations revealed high participant satisfaction with the event.

Internal Audit

In December 2017, Goli Trump joined the Office of Compliance, Risk, and Ethics as the internal audit and advisory services director. She will continue performance of risk-based audits that were initiated by Baker Tilly last year, and serve to advise the College through consultations and reviews. Because internal audit is being reimagined to align with global internal audit standards set by The Institute of Internal Auditors, there will be enhancements to the department's goals. If you have asked yourself, "what is an internal auditor," or "how is the work of an internal auditor different than an external auditor," look for opportunities for increased awareness about the role of internal audit and advisory. More information can be found on the [website](#), and live informational sessions will be presented to administrators and staff business units. In addition, an internal audit and advisory master plan will be developed to describe the responsibilities and strategic goals, and how internal audit helps the College to meet its objectives.

Thus far, the College internal auditors have been busy providing the College with recommendations in its effort for continuous improvements. In 2017 and 2018, three areas were reviewed or audited and reports were delivered to College leadership, including to the business units that collaborated with the internal auditors. The first report was an internal controls design review and data analysis of the College's procurement and corporate card program. The second report was a review of the processes in and around data integrity and reporting. The final report was a two-phase review of implementation activities related to the Workday system applications. Leadership and business owners have begun taking actions on the recommendations made by the internal auditors.

Maryland State Ethics Commission Reporting

Montgomery College employees are subject to the Maryland State Ethics Commission reporting requirements. The State of Maryland requires certain College employees; selected by the position they hold, to file an annual disclosure as a means to monitor any potential conflicts of interest. Currently there are 144 positions at the College required to file an annual financial disclosure with the State. In 2017, all employees, with the exception of one, completed the disclosure form by the April 30 deadline. The Office of Compliance, Risk, and Ethics coordinates the identification of the employees with the State, who by position duties, require them to file. The Office of Compliance, Risk, and Ethics also monitors the timely submission of the disclosures. The responsibility to file belongs to the individual required, not the College.

Beginning in 2018, and applied to the reporting for 2017, a new State legislation requires Montgomery College to list entities, financial institutions that do business with the College. This list is sent to all College filers so that they can indicate indebtedness with any of the listed entities. Previously the State of Maryland supplied this list for the entities doing business with the State. The change was made so that employees can indicate financial businesses dealing more directly with the employee's agency.

Code of Ethics and Standards of Conduct

The Office of Compliance expanded its scope of responsibilities by adding the role of ethics in 2017. In June 2017, the Board of Trustees adopted Policy and Procedure 31000–Code of Ethics and Employee Conduct, establishing a Code of Ethics for employees. An employee Code of Ethics establishes a set of standardized ethical values for employees to follow which has become a common standard in both non-profit and for-profit organizations.

The expectations expressed in the College’s policy help to focus the institution on our shared values. These expectations form the core of our new ethics program: accountability, civility and collegiality, compliance, fairness, honesty, respect, and stewardship.

The Compliance, Risk, and Ethics Office has focused initial communications about the Code of Ethics to supervisors and managers, particularly related to training. It is essential for managers to be familiar with Policy and Procedure [31000–Code of Ethics and Employee Conduct](#), follow it as an example for others, and enforce the ethical standards when concerns arise. Employees may bring an ethical concern to a manager’s attention or refer a concern to the Ethics Point confidential reporting line. Managers should proactively address perceived ethical concerns and provide guidance to their teams on upholding the College ethical standards. Ongoing efforts have taken place and continue to further develop an ethics training to be conducted by managers with their teams. The Compliance, Risk, and Ethics Office is working with ELITE to develop lesson plans for the manager training.

This year, attention has been devoted to the implementation of the College’s new reporting line, EthicsPoint, an anonymous means of reporting to employees. EthicsPoint replaced the former College reporting line, Red Flags Reporting. Employees who have an ethical concern are directed to either contact their manager or contact the EthicsPoint reporting line directly. EthicsPoint reporters may either identify themselves or remain anonymous. Employees are protected from retaliation when they report a concern in good faith.

The Office of Compliance, Risk, and Ethics receives all reports submitted through the EthicsPoint confidential reporting line. Staff in the compliance, risk, and ethics office serve as system administrators. All reports made to the EthicsPoint reporting line are promptly responded to, followed-up, and tracked with information managed and maintained confidentially within the EthicsPoint system. In addition, case management includes extensive collaboration efforts with Employee and Labor Relations, including regularly scheduled case coordination meetings between the Office of Compliance, Risk, and Ethics and Employee and Labor Relations.

An ethics climate survey has been developed and will be administered for all employees during spring 2018. The survey is to be administered through Quantisoft, striving to have relevant consistency with the Equity and Inclusion Survey and the Employee Engagement Survey. The Ethics survey results will provide baseline data to better understand the College community’s awareness of expectations of ethical conduct and standards of conduct; perceptions of misconduct; and a clearer picture of the ethical culture at Montgomery College. In addition, the compliance, risk, and ethics office has begun working collaboratively with the Ombuds, chief human resources officer, and the chief equity and inclusion officer to cross-walk the results from the Ombuds Report, Equity and Inclusion survey, Employee Engagement survey, and the Ethics survey, once completed.

Additional activities related to the ethics program have included two retreats to plan the ethics program elements, development of a College Ethics website, Governance council presentations, a special ethics training for senior leaders with Dr. Linda Trevino, Ethics Professor from Penn State University, college wide awareness communication efforts, and three pilot employee focus groups. Fiscal year 2019 will include the development of an Ethics Advisory Group.

Compliance, Risk, and Ethics Program Master Plan

The unit completed a unit assessment in 2017 through the [Collegewide Area Review \(CAR\)](#) process. The CAR process is both a self-assessment and an opportunity to benchmark against other institutions. The unit's CAR process included an approval process up to and including approval of the CAR report by Dr. Pollard.

The unit's recommendations are reflected in the program goals section of this report. In addition to specific program goals, a recommendation moved forward for the unit to further develop specific functional areas within department to streamline efficiency while still cross training sufficiently to have depth of staff competencies. Additionally, when additional responsibilities are assigned to the unit, appropriate resources – budget and staffing - must also be assigned to be able to successfully fulfill the new responsibilities.

Specific Program Goals

Program Goals for Regulatory Compliance

- Establish strategies for increased engagement with members of the Compliance Advisory Committee (CAC)
- Establish incentives for employees with high regard for compliance and ethics (Compliance and Ethics Fellow program)
- Implement a youth protection data management system
- Determine additional monitoring processes needed for newly added service areas to help more closely track work in other College units to achieve compliance
- Monitor federal Title IX guidance and case law and update Montgomery College Policy and Procedure 31001–Sexual Misconduct, to ensure regulatory compliance
- Implement collegewide prevention initiative to increase awareness of and response to sexual misconduct

Program Goals for Enterprise Risk Management

- Develop an Enterprise Risk Management (ERM) policy and procedure
- Deploy ERM framework
- Establish Enterprise Risk Council
- Engage senior leadership in the use of ERM data in decision-making

Program Goals for Ethics

- Administer the Focus on Ethics survey to assess the College ethical climate and establish a baseline on which to assess effects of ethics program activities

- Build awareness among employees for the Ethics Point reporting line
- Develop and implement ethics program processes
- Implement ethics training and awareness

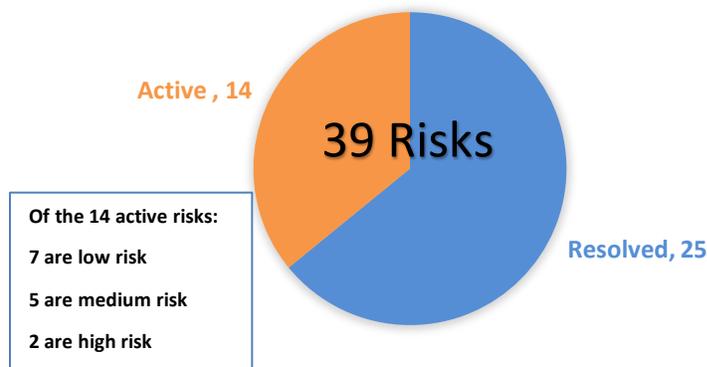
Program Goals for Internal Audit

- Assess the FY2018 and FY2019 internal audit plans, revise, and obtain institutional approval based on new or ongoing risk management at the College
- Based on revised internal audit plan, perform internal audit engagements to support the College’s achievement of its goals and mission
- Develop and deliver an audit follow-up report
- Develop and implement internal audit processes
- Deliver presentations and training to staff and administrators in order to develop a strong tone of objectivity, inclusion, and awareness about internal audit
- Build awareness of the advisory services role of internal audit
- Establish relationship between internal audit and the audit sub-committee of BOT.

Compliance Risk Report and Progress

The chart below shows the number of active vs. resolved compliance risks. It is important to note that of the 14 active compliance risks being monitored, seven are in the medium to high risk levels. Four of the seven risks now rated at a low risk level have moved from medium or high risks rating levels over the past year.

IDENTIFIED COMPLIANCE RISKS



Compliance, Risk, and Ethics Office Outreach, Training, and Professional Development

The Office of Compliance, Risk, and Ethics conducts training and awareness efforts for both employees and students including presentations, the Compliance Matters newsletters, compliance fairs, online training, and face-to-face training.

College Student Compliance Training

As part of the sexual violence prevention efforts for students, the College has an online training program that all new students are required to complete. The course, *Haven - Understanding Sexual Assault*, alerts students about issues of sexual violence and each student’s critical role in keeping the campus safe.

Montgomery College adopted the [“Bringing in the Bystander” program](#) in spring 2016, a program developed at the University of New Hampshire. The program uses a community of responsibility model to teach bystanders how to intervene safely and effectively in cases where sexual assault may be occurring or where there may be risk. Its main message is that “Everyone in the community has a role to play in ending sexual violence.”

In 2017, College trained faculty offered bystander intervention training to students. In summer 2017, 75 students participated in five sessions, three on the Rockville campus and two on the Takoma Park/Silver Spring campus. In fall 2017, 270 students participated in 18 sessions, six on the Rockville campus, two on the Germantown campus, and ten on the Takoma Park/Silver Spring campus.

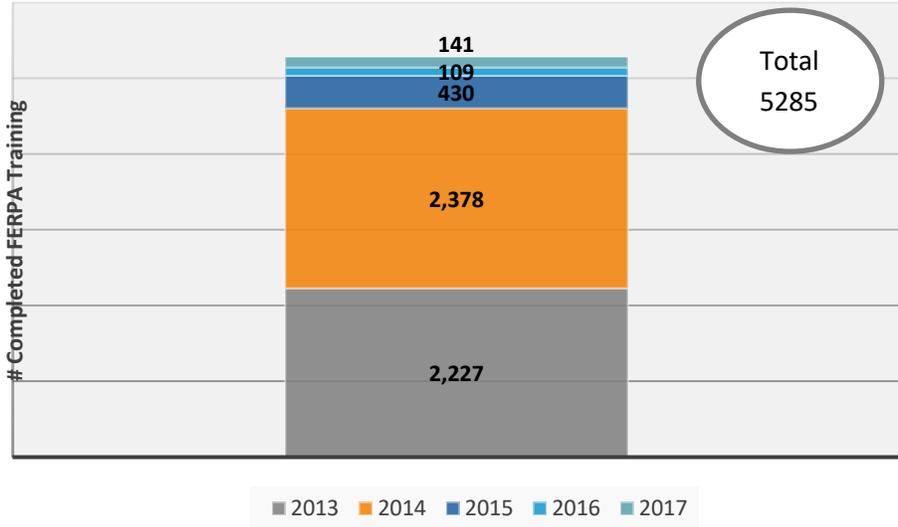
College Employee Required Compliance Training

Training Title	Required for:
Child Abuse and Molestation Awareness and Prevention in Maryland	Employees and volunteers in all divisions who come in contact with minors associated with any College program or activity that serves minors
Title IX Bridges: Building a Supportive Community	New Employees in Academic Affairs and Student Affairs divisions
Family Educational Rights and Privacy Act (FERPA)	New employees in Academic Affairs and Student Affairs divisions (within 12 months of hire)
ADA: Accommodating Students with Disabilities in Higher Education	New employees in Academic Affairs and Student Affairs divisions



Training Title	Required for:
Preventing Sexual Harassment and Workplace Discrimination	All new Administrators, Department Chairs, and Supervisors in all divisions
A Manager’s Guide to Diversity, Inclusion and Accommodation	All new Administrators, Department Chairs, and Supervisors in all divisions

Number Completed FERPA Training 2013-2017



Beginning in FY13, FERPA training was the first mandatory compliance training required of all employees. The chart above shows the number of employees having completed the training. Note that the dramatic decrease starting in 2015 is because most employees have completed the training and the majority of the 141 employees completing training in 2017 are mostly new employees.

Compliance and Ethics Awareness Week

Prevention and awareness activities are a significant feature of any compliance program. In the spirit of prevention, the Office of Compliance, Risk, and Ethics offered compliance fairs in October on each campus and in the Central Services Building. Annual compliance fairs are designed to educate and increase awareness of current laws and regulations affecting each member of the College community. College offices with compliance requirements are considered compliance partners. Compliance partners actively participate in staffing the fairs and

provide important information for our students and employees. This year’s events incorporated an emphasis on ethics, in coordination with the rollout of the College’s new Policy and Procedure [31000–Code of Ethics and Employee Conduct](#), and ethics program. Activities included fairs with information tables, an ethics video contest, and a special Raptor scavenger hunt. The compliance fairs are also a way to meet employees and students and engage in meaningful discussion. Employees and students across the College expanded their understanding of critical compliance areas by taking the time to participate in the compliance fairs.

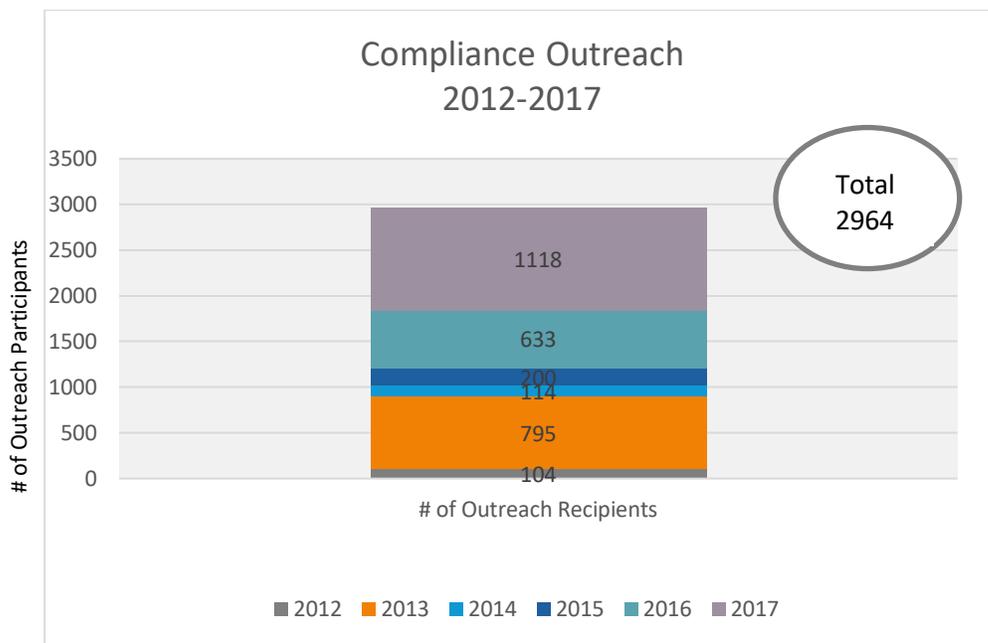


Figure 4– Compliance and Ethics Awareness Week Photo, Rockville Campus



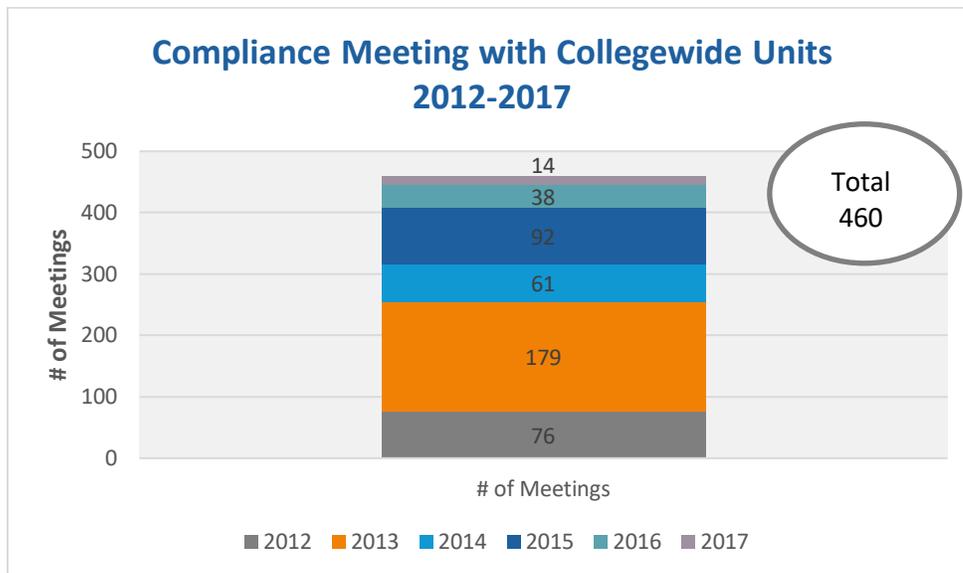
Figure 5 – Compliance and Ethics Awareness Week Photo, Central Services Building

Compliance, Risk, and Ethics Office Outreach and Professional Development

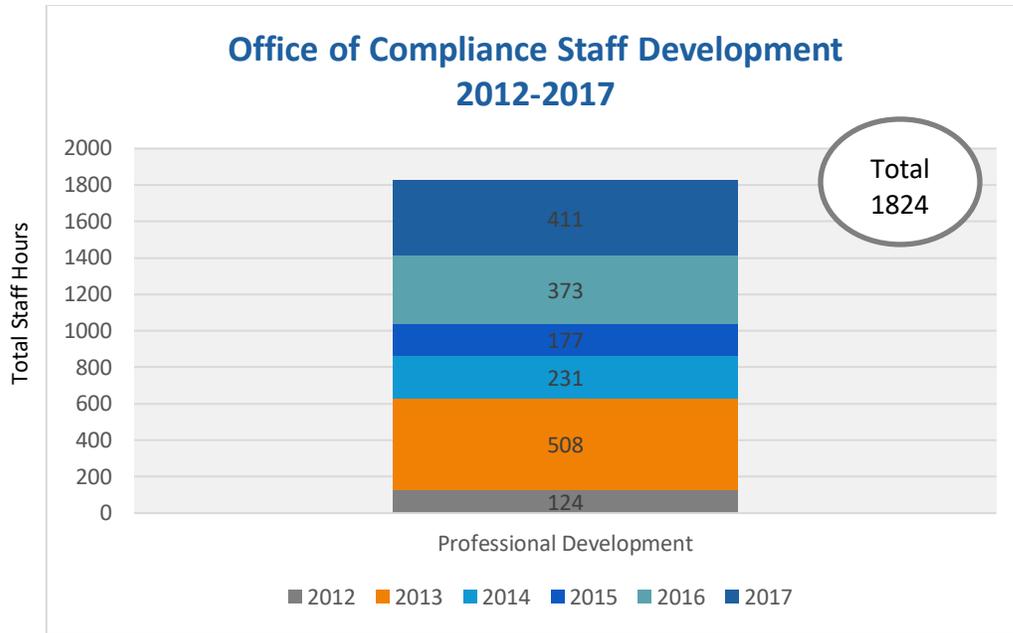


The chart above shows the number of students and/or employees attending presentations made by members of the compliance, risks, and ethics office in each year since the inception of the compliance office. These presentations have been on a variety of compliance-related topics and

been presented to a wide range of audiences from specific College units to all administrators and academic department chairs. In 2013, the 795 employees who received training were mainly as an education effort on the role of the compliance office. The increased outreach in 2016 was predominantly in the high-risk areas of Title IX and youth protection. The increase in outreach continued in calendar year 2017, including efforts to raise awareness of Title IX and youth protection, but also includes outreach concerning the newly implemented ethics program and Code of Ethics and Employee Conduct policy and procedure.



The chart above details the number of meetings held with collegewide units each year since the inception of the Office of Compliance, Risk, and Ethics. It is our practice to meet each fall with the key collegewide units with compliance responsibilities. We meet with each new or newly assigned (including interim assignments) administrator to provide a compliance orientation at Montgomery College. The declining trend in number of meetings with collegewide units reflects the improved on-going dialog and other venues to share information between the Office of Compliance, Risk, and Ethics and units across the college.



The chart above represents the total number of staff hours spent by compliance office staff in professional development activities for each year since our inception. Continual professional development is essential in the field of compliance as there are a wide variety of different compliance topics as well as an increasing number of new or changing laws/regulations. The variation year over year correlates to the changing nature of laws and regulations of regulatory compliance, addition of new functions to the office, and the development of new team members.

Conclusion

As the challenges in higher education increase, the more critical it is for institutions to effectively and continuously plan, assess measure, analyze, review and to overall manage their risks. The Office of Compliance, Risk, and Ethics has a critical part of helping the College manage and prevent risk to meet strategic goals and manage risk more effectively through independent and objective means.