Office of Compliance, Risk and Ethics Program Report

January 2016 – December 2016

MC

MONTGOMERY

COLLEGE

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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;
- 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.

The trend exists in higher education toward increased expectations of institutional accountability to various stakeholders: students; federal, state and local governments; employees; regional accrediting agencies, and the community. Significant and challenging expectations exist for colleges and universities to attract, retain and graduate students. As colleges face increasing pressure to meet expectations, it is logical to pursue more effective risk management to increase the likelihood of achieving institutional goals. Colleges are attempting to diminish negative risk and incur positive risk for increasing the probability of achieving mission and goals. Risk management practices are being conducted in more deliberate and thoughtful ways across more and more college campuses. Enterprise risk management practices, once thought reserved for large corporations, are now being 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, leading the way for a future trend to come in community colleges, 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 functions in one area at the College. The combining of risk functions in one area is a practical and efficient approach to respond to the increasing expectations of institutional accountability and to assure a higher rate of successful outcomes of college initiatives and resources.

Like the opportunity that existed in 2012 for new thinking and strategy to manage regulatory compliance oversight, the Office of Compliance, Risk and Ethics has an opportunity to effectively lead the College in new thinking and approaches to enterprise risk management. The additional dimension of the impact of the change of US Presidential Administration makes this a particularly interesting time of uncertainty where the case for more structured risk management becomes even stronger.

The Office of Compliance, Risk and Ethics maintains a compliance watch list which is updated twice a year. The watch list identifies higher than acceptable compliance risk and provides institutional focus to reduce risk levels. In 2016, higher than acceptable compliance risk was newly identified for two areas: bond compliance and the Clery Act. The Clery Act returned to the watch list after its previous status of achieving an acceptable risk level. Risk levels increased

for two risks on the compliance watch list, the Affordable Care Act and criminal background checks. Seven areas experienced reduced risk levels, but still remained above an acceptable level: IT accessibility, protection of minors, Affordable Care Act, athletics (Title IX), copyright, bond compliance, and the Clery Act. Several risk areas, including the Affordable Care Act, bond compliance and the Clery Act emerged at higher risk levels early in 2016 and were reduced to a lower risk level later in the year. The return and changes to the Clery Act risk levels were attributed to changes in the College organization and staffing.

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. Much of the information is focused on students and increasing their compliance knowledge as part of their education. Activities are also planned throughout the week for College employees to increase the awareness and knowledge about applicable laws and regulations. In 2016, the Office of Compliance, Risk and Ethics staff engaged in 373 hours of professional development in order to remain current and informed on the evolving landscape of higher education compliance and risk areas.

Two new online training programs were introduced in 2016: *Child Abuse and Molestation Awareness and Prevention in Maryland*, and *Title IX Bridges: Building a Supportive Community,* required for specific populations. Other online compliance trainings are available through the College's MC Learn portal. In FY16, 633 College employees completed compliance training, predominantly in these two new course offerings.

Establishing and maintaining effective policies is an essential component of our program. The Office of Compliance, Risk and Ethics was active this year in several policy areas. Collaborative work resulted in an update to the College Copyright Policy and a new Copyright Procedure. The previous Copyright Policy did not have an associated set of procedures and through the efforts this year, Copyright Procedures were established. A new Electronic Information Technology Accessibility Policy was implemented governing the College use of IT resources in accordance with Americans with Disability Act standards. An update was completed to the College Student Cumulative Record, updating guidance relative to FERPA law.

In support of the focus on risk management overall, an enterprise risk assessment was conducted. From the results of the enterprise risk assessment, an internal audit plan was developed for the subsequent three years. Audits commence in 2017 for the highest institutional risk areas. Audits may also be conducted upon request or for unforeseen or emerging risk areas.

A Governance led, multiple year initiative resulted in the development of a draft employee code of ethics. The College has not had an employee code of ethics in the past. The draft code of ethics passed from Governance to the President for review and implementation in 2017. This initiative marks a milestone in the College evolution of the compliance, risk and ethics program, as an employee code of ethics and standards of conduct is a hallmark of a compliance program.

Higher Education Trends in Compliance and Risk Management

In recent years, higher education laws and regulations had continued to increase in both number of laws and the level of federal government oversight, scrutiny and enforcement. During 2016, it has become less certain what lies ahead for the future of higher education regulatory enforcement. The impact of the change of U.S. Presidential Administration and particularly, the direction of the new U.S. Secretary of Education have yet to become apparent; however, as the federal government was closely monitoring higher education's adherence to laws and regulations, colleges and universities were also establishing institutional policies that align with federal laws. Particularly active areas of federal guidance and enforcement focused on preventing sexual misconduct, protections against gender discrimination, youth protection on College campuses, campus safety, and accessibility of electronic information.

Even if the trend in enforcement results in less stringent oversight in the new Administration, the established college and university policies and procedures still stand and can continue to reinforce the goals of strict compliance to the spirit of the laws. Institutions can and should provide internal oversight and adhere to their internal policies in the spirit of protecting students and the value of their education, as the intent of the federal laws. Institutional policies can reinforce the continuation of the ongoing work of compliance: to protect the integrity and value of a student's education, to protect student's safety while on campus, and to protect the financial investment of federal dollars in public colleges and universities.

So, while the future is uncertain for higher education compliance federal oversight, colleges and universities can sustain their commitment to protecting the value of a college education for students; to keeping students safe on campus; to reducing and managing risks, and to managing a higher likelihood of meeting institutional goals. Strong compliance and risk management programs will increase institutional integrity and accountability and help to achieve a higher certainty of reaching institutional goals.

The Office of Compliance, Risk and Ethics

During 2016, the College transitioned additional responsibilities to the compliance office. The Office of Compliance assumed responsibility for internal audit, Maryland State financial disclosure reporting and the implementation of an ethics program through an employee Code of Ethics. Through this transition and broadening of the scope of responsibilities, the office name evolved from the Office of Compliance to the Office of Compliance, Risk and Ethics. Additionally, future plans are underway for the compliance, risk and ethics office to develop an enterprise risk management (ERM) program to manage risk with a holistic and more structured approach. Combining the collective risk functions in one area of the College reflects a trend in higher education to coalesce risk functions under one organizational area.

The Office of Compliance, Risk and Ethics reports directly to President DeRionne Pollard. A 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 consists of Vicki Duggan, chief compliance, risk and ethics officer; Tonya Buscher, administrative aide; Julie Foster Martorana, compliance specialist and project manager; Christopher Moy, director of ADA compliance and Title IX coordinator; and Kristen Roe, youth protection coordinator.
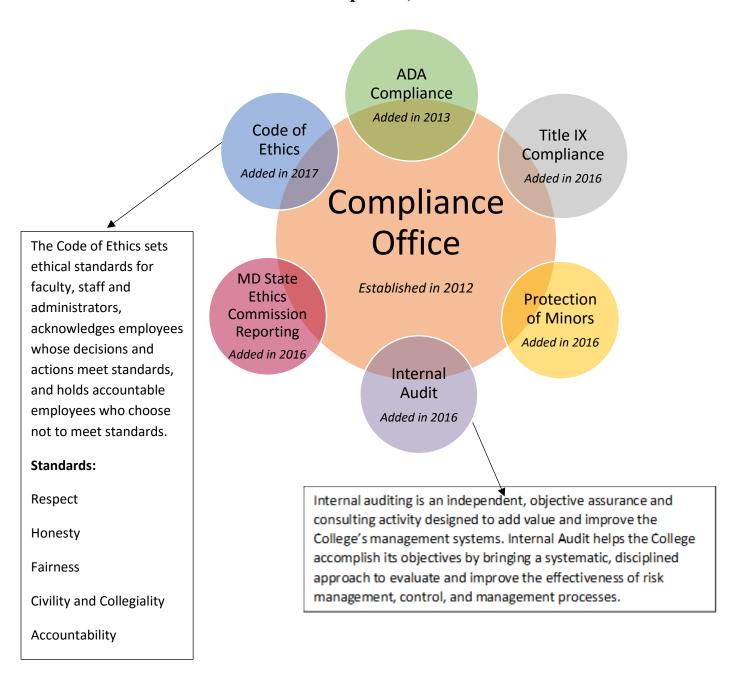
Office of Compliance, Risk and Ethics

The Code of Ethics sets ethical standards for faculty, staff and administrators, acknowledges employees whose decisions and actions meet standards, and holds accountable employees who choose not to meet standards.

Standards:

Respect

Honesty

Fairness

Civility and Collegiality

Accountability

Code of Ethics
Added in 2017

ADA Compliance
Added in 2013

Title IX Compliance
Added in 2016

Compliance Office

Established in 2012

MD State Ethics Commission Reporting
Added in 2016

Protection of Minors
Added in 2016

Internal Audit
Added in 2016

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve the College's management systems. Internal Audit helps the College accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and management processes.

Figure 1: Office of Compliance, Risks and Ethics Responsibilities

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, 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 that are successfully used in other Colleges.

The Office of Compliance, Risk and Ethics identifies compliance risks by surveying compliance partners across the college and evaluating gaps in compliance requirements. All compliance risks are maintained and tracked to produce a prioritized report which ranks the College's current compliance risks in terms of impact and probability. Impact measures 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. In December 2016, the College passed a Copyright Policy that was the result of collaborative efforts of the Office of Compliance, Risk and Ethics and the College Libraries. The new policy updated the College Use of Copyright Policy and developed procedures that did not exist with the previous copyright policy.

Americans with Disabilities Act (ADA)

Montgomery College is committed to providing equal opportunity to persons with disabilities, including equal access to education, employment, College programs, services and activities provided through information technology. The accessibility of electronic information is the most recent area of increased enforcement of ADA. Significantly increased portions of instructional material used in classes are shared electronically through websites, learning management systems, online videos, and electronic textbooks. The Americans with Disability Act (ADA) requires that instructional material must be readily usable and accessible to all students at the time it is presented. There cannot be a delay in services or materials to students with disabilities. To be accessible means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. It is the obligation of instructional faculty to ensure that their instructional material is accessible to all.

The Office of Compliance, Risk and Ethics oversees the compliance of ADA across the College to assure equal access to College electronic resources by persons with disabilities.

In May 2016, the College passed a new policy governing IT Accessibility: Electronic Information Technology Accessibility Policy, #66004. The policy gives definition and expectations to what is expected of the College with regards to 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.

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 oversees compliance with Title IX law. Title IX protects students, faculty and staff against gender based discrimination, including sexual misconduct. 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 Title IX Advisory Committee, under the leadership of the Title IX Coordinator, meets monthly to provide guidance and support for the College's efforts in this area. The Title IX Advisory Committee assists the Title IX Coordinator with respect to the Title IX compliance efforts; and 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 has also recently signed on to participate 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. Over

the next two years, the Title IX Advisory Group will engage in an evaluation of current practices, develop an individual implementation plan focused on areas identified as in need of improvement, 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 to pursue the promise of higher education.

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 our 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 its second 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.

Internal Audit

The College internal audit function is managed by the Office of Compliance, Risk and Ethics. The audit work is being conducted through a contract with an external vendor, Baker Tilly. In Fall 2016, in collaboration with Baker Tilly, the College conducted an enterprise risk assessment which is a foundational piece to implementing risk based auditing. The enterprise risk assessment was conducted through interviews with senior leaders to assess their perceptions of institutional risk levels and a review of risk landscapes of comparable institutions. Risk based auditing focuses audit work on the institution's highest risks, defined as those most likely to prevent the institution from achieving mission and goals. The enterprise risk assessment was accepted by the President's Executive Cabinet (PEC) in November 2016. A three-year audit plan was developed from the risk assessment results and approved by the PEC in December 2016. Audit work will commence in Spring 2017 in alignment with approved audit plan.

Maryland State Ethics Commission Reporting

The State of Maryland requires annual financial disclosure reporting from specific College employees to monitor potential conflict of interests. In August 2016, the responsibility for coordinating the College's reporting requirements with the Maryland State Ethics Commission transitioned to the Office of Compliance, Risk and Ethics. Coordination efforts include serving as the primary contact between the College and the Maryland State Ethics Commission to maintain an accurate and up to date listing of College employees and their position descriptions who are required by the State of Maryland Ethics Commission to file an annual financial disclosure form.

Code of Ethics and Standards of Conduct

An initiative to develop an employee code of ethics, led by College Governance, started in 2014 and continued throughout 2016. A draft code of conduct was developed and moved forward from the College Council to the President's office in fall 2016. This is ground breaking work, as Montgomery College has never had an employee Code of Conduct in place. A Student Code of Conduct is in place and is a cornerstone for student standards of conduct, but an employee code has not been part of our institutional practice.

From the work of governance, a *College Code of Ethics and Standards of Conduct Policy* was drafted. The policy will be reviewed by the PEC for approval and eventual review by the Board of Trustees. An employee code of ethics has been recommended through various entities:

- In consecutive College Ombuds reports (2014-2016);
- By the Office of Compliance, Risks and Ethics, in alignment with the Federal Sentencing Guidelines for effective compliance programs, and
- As a recommendation adopted by and moved forward by College Governance.

We anticipate that the Code of Ethics and Standards of Conduct College Policy and the ethics program to support it will be implemented in 2017. The implementation, rollout and management of the ethics program is being led by the Office of Compliance, Risk and Ethics.
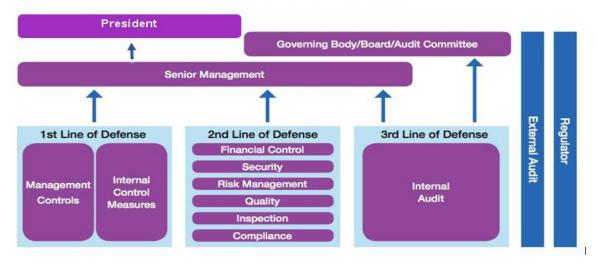
Compliance, Risk and Ethics Program Strategic Plan

With newly added responsibilities to the Office of Compliance, Risk and Ethics, it is critical to integrate processes from each area into a comprehensive risk management approach that acknowledges the relationships of the various functions and managing how these areas work together. The successful integration of these functional areas will provide senior management and the College community with the information needed for optimal decision-making concerning the management of risks and opportunities facing Montgomery College.

Data management is a critical component of managing the information of a robust compliance, risk and ethics program. As the office has matured, the need for updated data management systems have become more apparent. Compliance systems features include increased efficiency and sharing of data elements; recall of historical institutional data; report generation for senior leaders and risk owners, and maintenance of accurate and consistent information. The compliance, risks and ethics office data management system will be implemented in 2017. The new system will enhance both the office's and risk owner's ability to track; document and monitor progress to reduce compliance risks; improve how we work and collaborate among risk owners, and assist to provide oversight.

The integration and layering of risk management functions is depicted below in the three lines of defense model. Each risk function has a unique role and they work together as a comprehensive and coordinated system of risk management. Multiple lines of defense increase the effectiveness of risk management and assure the integrity of our comprehensive risk program.

The Three Lines of Defense Model

*Adapted from ISO Framework

Figure 2: Three Lines of Defense Model

Specific Program Goals

Program Goals for Regulatory Compliance

- Monitor changing landscape of higher education compliance.
- Expand use of compliance data system incorporating compliance risk mitigation monitoring and notifications for mandated disclosures and reports.
- ADA – Establish captioning process for instructional material for faculty outside of an accommodation requirement. This will increase the overall accessibility of instructional materials for all students.
- Title IX – Increase levels of student completion of Haven training, training for prevention of 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

- Develop a Code of Ethics and Standards of Employee Conduct policy and procedure
- Develop and implement ethics program processes

- Implement ethics training and awareness
- Establish ethics reporting line

Program Goals for Internal Audit
- Fulfill the multiple-year audit plan with audits beginning Spring 2017
- Develop and implement internal audit processes
- Provide continuity from audits conducted prior to July 2016, when the internal audit function transitioned to the Office of Compliance, Risk and Ethics
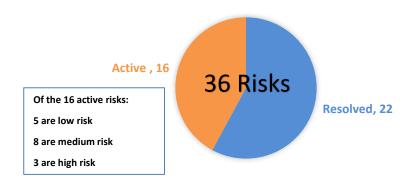- Build awareness of the advisory services role of internal audit

Compliance Risk Report and Progress

Work across all compliance risk areas this year has resulted in risk reduction in the areas of:

- IT Accessibility
- Protection of Minors
- Affordable Care Act
- Athletics Compliance (Title IX and NJCAA)
- Copyright
- Bond Compliance
- Clery Act

The chart below shows the number of active vs. resolved compliance risks. It is important to note that of the 16 active compliance risks being monitored, 11 are in the medium to high risk levels.

IDENTIFIED COMPLIANCE RISKS

Active , 16

36 Risks

Resolved, 22

Of the 16 active risks:

5 are low risk

8 are medium risk

3 are high risk

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

An important part of any effective compliance program is compliance training and awareness. Ensuring that the College community is aware of applicable compliance requirements and providing mandated training is the first line of defense against non-compliance. Ongoing compliance training and awareness is a critical responsibility for the Office of Compliance, Risk

and Ethics. The training and awareness efforts include campus events, scheduled webinars, unit informational meetings, online training, and professional development for the compliance office personnel. The office shares information through routine communications, training sessions, awareness events, and newsletters to reach specific audiences.
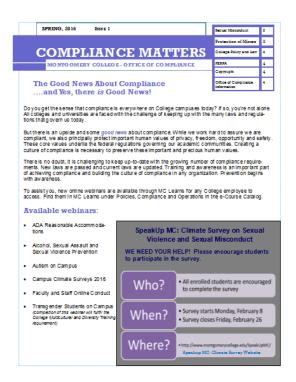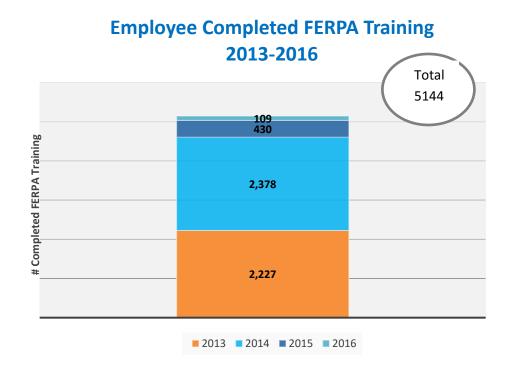

Figure 3: Compliance Matters Newsletter for College Employees

Introduced this year are two new required online training programs involving Title IX and youth protection:

Training Title	Required for:
Child Abuse and Molestation Awareness and Prevention in Maryland	All employees and volunteers in all divisions who come in contact with minors associated with any College program or activity
Title IX Bridges: Building a Supportive Community	New employees in Academic Affairs and Student Affairs divisions

Several other compliance topics continue to be included in required training for employees:

Training Title	Required for:
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
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

Employee Completed FERPA Training 2013-2016

Total 5144

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 due to the fact that most employees have completed the training and majority of the 109 employees completing training in 2016 are new employees.

National Compliance Awareness Week

National Compliance Awareness Week, the first week of November, is celebrated with a series of collegewide events designed to raise compliance awareness. The goal is to educate both

students and employees on the role of a compliance office and learn about current compliance topics. Compliance fairs were held at each campus with information tables from the following compliance partners:

- ➢ Americans with Disabilities Act
- ➢ Title IX
- ➢ Compliance
- ➢ Cybersecurity
- ➢ Drug & Alcohol Abuse Prevention-Employees
- ➢ Equal Employment Opportunity/Family Medical Leave Act

- ➢ Environmental Safety
- ➢ Emergency Planning
- ➢ Family Educational Records Privacy Act (FERPA)
- ➢ Safety and Security
- ➢ Youth Protection
- ➢ Accessibility

Each event had information, prizes and snacks to engage attendees. Collegewide online activities engaged all employees, which included a prize drawing of those who participated.

In addition to campus fairs, employees were invited to attend information sessions, presented by College risk owners, with topics offered on the higher risk areas at the College.
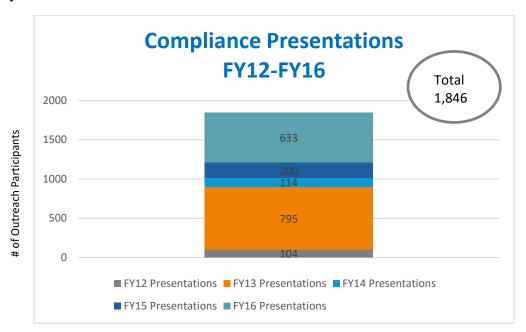

Figure 4 – National Compliance Awareness Week Photos

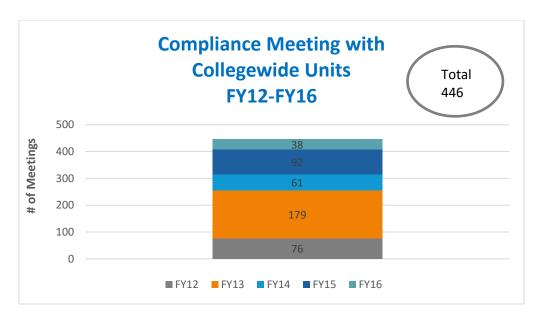## Compliance, Risk and Ethics Office Outreach and Professional Development

Ongoing training for the Office of Compliance, Risk and Ethics staff is critical to stay current with the evolving regulatory landscape. The office staff participates in webinars, conferences, affinity groups, and self-initiated research. In 2016, the Chief Compliance, Risk and Ethics Officer presented on compliance topics at the Community College Risk Managers Conference in July, at the Association of College and University Auditors in September and conducted a national online webinar for Paperclip Communications in September.

New information and compliance updates are routinely shared between compliance risk owners and the Office of Compliance, Risk and Ethics as part of a compliance professional network. Compliance risk owners are the known compliance experts in their respective areas and the compliance office provides an oversight role, partnering with College units to assure compliance.
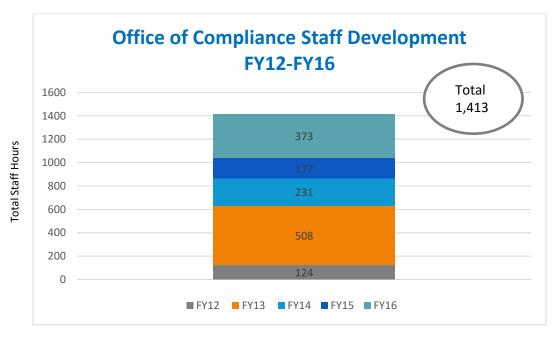
Assuring the College community stays abreast of new and changing regulations—and their impact—is an essential duty of the College and a key responsibility of the compliance program. This requires an enterprise commitment to ongoing professional development and training in the area of compliance. Compliance training and awareness is conducted throughout the year and in a variety formats and venues.

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 have been presented to varying types of audiences ranging from specific College units to all administrators and academic department chairs. In FY13, the 795 employees who received training were mainly as an education effort on the role of the compliance office. In FY16, the 633 employees who received training were mainly in the high risk areas of Title IX and youth protection.

Compliance Meeting with Collegewide Units FY12-FY16

Total 446

# of Meetings

FY16	38
FY15	92
FY14	61
FY13	179
FY12	76

■ FY12 ■ FY13 ■ FY14 ■ FY15 ■ FY16

The chart above details the number of meetings held with collegewide units each fiscal 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.

Office of Compliance Staff Development FY12-FY16

Total 1,413

Total Staff Hours

FY16	373
FY15	177
FY14	231
FY13	508
FY12	124

■ FY12 ■ FY13 ■ FY14 ■ FY15 ■ FY16

The chart above represents the total number of staff hours spent by compliance office staff in professional development activities for each fiscal 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.

Conclusion

The Office of Compliance, Risk and Ethics is in its 7th year as an office and most recently, expanded risk management functions with new responsibilities that coalesce enterprise risk oversight collegewide. The risk management processes and standards have been established for compliance oversight and will be applied to provide oversight in other risk categories beyond compliance: financial, operational, technology, human capital, legal liability, and operational. A more deliberate and holistic approach to managing risk and opportunity reflects trends in higher education institutions that lead in enterprise risk management principles. This is both a long term and ambitious institutional goal that will involve focused and purposeful risk decisions and the follow-through of actions and priority setting to align the decisions made.

The internal audit function has the opportunity to play an important role in the maturing of our risk function and increased accountability. Fulfilling the internal audit plan is a key part of the ability of the Office of Compliance, Risk and Ethics to conduct a comprehensive risk program. The internal audit function at the College over recent years has not been properly positioned or fully empowered to fulfill the opportunities of a high functioning internal audit office. Changes are in progress toward a high quality and empowered internal audit program.

The employee Code of Ethics and Standards for Conduct is a critical initiative for the College to set a higher level of awareness and adherence to ethical standards. The Office of Compliance, Risk and Ethics will analyze opportunities for logical associations between the compliance and ethics programs; between the audit and compliance programs; and for the ERM and compliance program. Some of the efficiencies in implementing risk management in the different office functions can be potentially achieved through training programs, communication efforts, reporting mechanisms, and with capitalizing on existing relationships with risk owners.

The Middle States Accreditation process includes a significant focus on institutions' state of compliance. This fits with the recent national trend toward a greater focus on assuring compliance to federal laws and regulations. The Chief Compliance, Risks and Ethics Officer is leading a College effort to develop the compliance report that is required as part of Middle States accreditation process. This effort is currently underway and will conclude with the report being submitted in late 2017.

During this past year of expanded responsibilities for the compliance program, and going forward, the goal is to implement effective risk management practices in an efficient manner, with practices that reflect a progressive and forward thinking institution. The identification, education and awareness, monitoring, and prevention of unwanted risk provides value to the institution for being proactive in risk management, rather than reactive. Effective risk management will create more transparency, dialogue, and opportunities around risk - when to reduce risk and when to increase risk – to increase the likelihood of institutional goals.