

## IV.A.1.

### WILLIAM & MARY'S COMPLIANCE AND EQUITY PROGRAM

The College of William & Mary is committed to lawful and ethical behavior in all of the university's activities. In 2011, William & Mary established a central compliance function, approved and endorsed by the Board of Visitors in 2013. Updates to the [Compliance Program Charter](#) were ratified by the Board of Visitors in 2017.

It is the overall responsibility of the Chief Compliance Officer to build, coordinate, and oversee the compliance and ethics program. The program is designed in accordance with federal guidelines to prevent and detect illegal or unethical conduct. With the collaboration of the President's Executive Leadership Team, the program seeks to promote an organizational culture of shared accountability. In addition to the Chief Compliance Officer, the Office of Compliance & Equity consists of three full-time professional staff and an administrative coordinator. Specific biographical information about each team member is provided on page two of this document.

#### *Compliance & Equity and the Board of Visitors*

The Board of Visitors sets the tone at the top by promoting and supporting a university-wide cultural of ethical conduct. The Audit and Compliance Committee of the Board of Visitors provides oversight of the compliance program, and the CCO reports regularly to the Committee. These reports include awareness of significant internal investigations and other compliance risks and information on the status and overall effectiveness of the program. The Audit and Compliance Committee and the Board of Visitors as a whole also receive regular briefings regarding sexual assault and timely updates on other relevant issues.

#### *Services Provided*

The Office of Compliance & Equity manages three programs:

##### **I. Compliance & Ethics Program:**

- **preventing** misconduct through establishment of expectations and working with Internal Audit, Human Resources, University Counsel, and other staff to improve internal controls and develop compliance solutions.
- **educating** students, staff and faculty annually about compliance obligations, including mandatory reporting and avoidance of conflicts of interest.
- **remediating** identified problems and gaps through advocacy for increased training of supervisors, targeted education for groups and individuals, and consistent disciplinary response to misconduct.

##### **II. Equity Program:**

- **ensuring** an environment that is free of discrimination, harassment, retaliation, and sexual misconduct.
- **creating and promoting** policies and procedures for complaint handling and investigations,
- **coordinating** the university's response to regulatory investigations and inquiries.

##### **III. Policy Program:**

- **ensuring** the university has policies and procedures reasonably designed to satisfy legal obligations and prevent misconduct.
- **administering** the university's policy program, which includes a modified [notice-and-comment](#)

[period process](#) for development of new policies and procedures, as well as recurrent revisions of existing policies.

- **maintaining** an [online policy library](#) that centralizes all university policies regardless of responsible office (e.g. personnel policies, financial policies, campus grounds and facilities policies).

As a member of various university committees, the CCO works to coordinate compliance and assists with assessment of risk management priorities and activities. Compliance & Equity work shares many elements with Audit, Legal, Human Resources, and Diversity, and the Compliance Office partners with these four offices. Compliance staff also work closely with the Dean of Students and other Student Affairs staff, particularly on student Title IX matters.

## **Staff**

*Chief Compliance Officer/Title IX Coordinator (Interim):* [Pamela Mason](#), JD, MBA, CCEP. Pamela came to work at William & Mary in 2004. She joined the Office of Compliance & Equity as Deputy Compliance Officer in 2013, and was named Interim Chief Compliance Officer and Title IX Coordinator in May 2018. Previously, Pamela was the Assistant Athletics Director for Compliance and Educational Services and Senior Woman Administrator for William & Mary's intercollegiate athletics department. Pamela graduated from Southern Methodist University in 1994 with a B.B.A. She continued her education at William & Mary and earned a J.D. and an M.B.A. in 2000. She is an associate member of the Virginia Bar and an active member of the North Carolina Bar. She is a Certified Compliance & Ethics Professional (CCEP).

*Deputy Compliance Officer/Title IX Coordinator:* **Vacant.**

*ADA Coordinator (Interim) and Compliance & Title IX Investigator:* [Carla Costello](#), PhD, ADAC. Carla has worked at William & Mary since 1999. She joined the Office of Compliance & Equity as an investigator in 2015. Prior to joining the Compliance & Equity team, she worked in the President's Office where she handled a variety of sensitive constituent issues and served as a member of the President's Task Force on Preventing Sexual Assault and Harassment. Carla earned a Doctor of Education in Educational Policy Planning and Leadership (Higher Education Administration emphasis) from William & Mary, a M.S. in Education from Radford University, and a B.S. in Psychology from Virginia Tech. Carla is an ATIXA-certified Civil Rights Investigator and ADA Coordinator.

*Compliance Investigator & Equity Specialist:* [Eric Hopkins](#). Eric joined William & Mary's Office of Compliance & Equity as an Equity Specialist/ Compliance Investigator in April 2016. Prior to joining W&M, he was a Special Agent in the Commonwealth's Office of the State Inspector General. He has extensive experience in conducting complex, sensitive criminal and administrative investigations into allegations of government waste, fraud and abuse, sexual harassment, sexual assault, employee misconduct, testifying in court and employee grievance hearings, and investigating special circumstances such as civil rights and employee rights lawsuits. He is a Certified Fraud Examiner, Certified Regulatory Investigator and a Certified Inspectors General Investigator. Eric graduated with a B.A from the University of Richmond with dual majors of Criminal Justice and Sociology.

*Administrative Coordinator:* [Margaret Morrison](#). Margaret Morrison joined William & Mary in 2014. She provides senior administrative support for the Offices of Compliance & Equity and University Counsel, including assistance with complaint intake and other sensitive matters. Margaret coordinates assembly of the Title IX Review Team and dissemination of investigation and other sensitive communications. Previously, she was employed at Christopher Newport University and NERA Economic Consulting. She graduated magna cum laude from Haverford College in 2009 with a B.A. in Religion with a minor in Economics.

**THE COLLEGE OF WILLIAM AND MARY IN VIRGINIA**  
**COMPLIANCE PROGRAM CHARTER**

The College of William & Mary, including the Virginia Institute of Marine Sciences (the university), is committed to lawful and ethical behavior in all of the university's activities. The compliance and ethics program of William & Mary is dedicated to this goal. This charter defines and specifies key aspects of the compliance and ethics program.

**The Audit and Compliance Committee of the Board of Visitors** provides oversight of the compliance and ethics program. The Committee:

- Approves the Compliance Program Charter.
- Promotes and supports a university-wide culture of ethical and lawful conduct.
- Ensures adequate resources and appropriate authority are provided to the compliance program.
- Provides oversight of significant compliance and ethics issues and risks.
- Receives reports from the Chief Compliance Officer regarding reports and investigations as well as the overall effectiveness of the compliance and ethics program.

**The Chief Compliance Officer** has overall responsibility for the compliance and ethics program and the Office of Compliance and Equity (Compliance Office).<sup>1</sup> The Chief Compliance Officer reports to the President and has direct access to the Audit and Compliance Committee.

The Compliance Office is charged with developing and coordinating implementation of a compliance and ethics program meeting federal guidelines. The Office:

- Ensures that the university has policies and procedures reasonably designed to satisfy legal obligations and prevent misconduct, and systems for detecting misconduct.
- Manages the policy program and promotes awareness of the university's Code of Ethics and other institutional values, regulations, and policies.
- Identifies and addresses, with management, significant compliance risks and violations. Participates in strategic planning and risk management programs.

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<sup>1</sup> Federal regulations require that a specific, "high-level" individual be given "overall responsibility" for the compliance and ethics program.

- Investigates reported or suspected compliance or ethical violations<sup>2</sup> and, with University Counsel, coordinates the university's response to regulatory investigations and inquiries. The Compliance Office, with accountability for confidentiality and safeguarding records and information, is authorized full access to university records, physical properties, and personnel pertinent to carrying out investigations.
- Reports significant ethics and compliance activities and issues to the university's executive management and reports on the effectiveness of the compliance and ethics program to the Audit and Compliance Committee.

**University leadership** is responsible for promoting a strong culture of compliance and ethics throughout the organization, with shared values and a commitment to the Code of Ethics. Executive employees and other managers:

- Align operational activities and strategic plans with the university's core values (Code of Ethics).
- Create a "speak up" culture, where employees are encouraged to come forward with concerns and retaliation is not tolerated.
- Demonstrate a commitment to integrity.
- Ensure that misconduct is addressed through appropriate disciplinary action and remedial measures.

**All members of the university community** share responsibility for maintaining an environment of accountability and integrity.

- Supervisors must ensure that employees have the knowledge and skills to fulfill their obligations. Supervisors must appropriately address or elevate reported violations or similar issues, including by preventing retaliation.
- All employees must obey the laws, regulations, and policies applicable to their university activities, and report illegal or unethical action that comes to their attention.<sup>3</sup> All employees are expected to cooperate with investigations.
- The university will not tolerate any form of retaliation against a member of the university community for reporting illegal or unethical conduct, as provided in the Whistleblower Policy.

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<sup>2</sup> Reported or suspected violations may be investigated by other individuals, committees, or offices, under university policies or procedures. For example, reports of research misconduct by a faculty member are investigated in accordance with the Faculty Handbook.

<sup>3</sup> Code of Ethics of the College of William & Mary.