

Ethics and Integrity Officer Job Description

Reporting: Administratively, the Ethics and Integrity Officer reports to the President with a dotted-line reporting structure to the Chair of the Audit, Compliance and Risk Committee.

Role and Responsibilities

1. Lead and provide oversight of the College's Ethics and Integrity Program to assure compliance with legal, regulatory, policy and ethical requirements impacting the College.
2. Develop, revise as necessary and monitor implementation of the College's Ethics and Integrity plan, consistent with higher education emerging best practices.
3. Provide oversight of Ethics and Integrity risk assessment process.
4. Develop, revise as necessary and monitor implementation of Ethics and Integrity program policies.
5. Provide oversight of Ethics and Integrity program training and education.
6. Provide oversight of the College's Ethics and Integrity hotline. Assure that questions and concerns raised through the hotline are promptly and appropriately addressed.
7. Provide oversight of all Ethics and Integrity related investigations, working with outside counsel as necessary.
8. Chair the College's Ethics and Integrity Committee.
9. Provide ethics and integrity program updates at regular meetings of the Audit, Compliance and Risk Committee.
10. Provide oversight for periodic, independent assessment of the effectiveness of the Ethics and Integrity program.
11. Apprise the President and senior management, the Chair of the Audit, Compliance and Risk Committee of the Board of Trustees, and the Board of Trustees about the College's Ethics and Integrity Program; trends, issues, and best practices in ethics and integrity programs.
12. Apprise the Audit, Compliance and Risk Committee Chair in a timely manner of matters described below (unless prohibited by law or in deference to an ongoing investigation by a law enforcement agency).
 - **Actual or Alleged Fraud** - Matters involving actual or alleged instances of material fraud by employees, including but not limited to theft, and regardless if the fraud involves the College. For purposes of applying this reporting and communication framework, materiality is defined as amounts exceeding \$10,000 in aggregate.
 - **Violation of Criminal Laws** – Matters involving actual or alleged criminal acts (*other than summary offenses*) perpetrated by a Trustee, College Officer, Department Director, or Academic Chairperson.
 - **External Compliance Violation** – Matters required to be referred to or otherwise involving a governmental entity (e.g. a Federal, State or local oversight agency), as well as matters triggering an external reporting obligation, *other than matters reported in the ordinary course of business*.

- **Reputational Risk** - Other ethics and compliance related matters that pose a high probability of garnering *significant* negative publicity or media attention.
- **Other Matters** – Other *significant* ethics and compliance related matters that, in the judgment of the Ethics and Integrity Officer, warrant reporting to the Audit, Compliance and Risk Committee Chair.

13. Report all matters described above to the President, who will in turn apprise the Chair of the Board of Trustees. Should any matter described above directly involve the President, the Ethics and Integrity Officer will report the matter directly to the Chair of the Board of Trustees as well as the Audit, Compliance and Risk Committee Chair. Should any matter described above directly involve the Ethics and Integrity Officer, the President will report the matter directly to the Audit, Compliance and Risk Committee Chair as well as the Chair of the Board of Trustees.