TEMPLE UNIVERSITY COMPLIANCE PROGRAM AND PROGRAM PLAN

I.   Introduction to Temple's Compliance Program

Elevating Temple University's culture of ethics, integrity and compliance depends on a collective commitment to comply with laws, regulations, and university policies. Through collaboration, support, and accountability we strengthen our decentralized compliance programs and the culture of compliance and ethical standards of our entire community.

Temple's Compliance Program (the Program) provides a proactive approach to managing risks, promoting a culture of ethics and integrity, and ensuring transparency and accountability.[1] It is designed to ensure that everyone at the university adheres to relevant legal, regulatory, and ethical standards in all aspects of operations including academic affairs, research, student life, athletics, human resources, information technology, finance, and more.

II.   Purpose and Scope of Program Plan

The Program focuses on ensuring compliance across the key areas, including:

- Athletics and NCAA
- Clery Act
- Data Privacy and Security
- Data Verification
- Environmental Health and Radiation Safety
- Facilities
- Finance
- Human Resources
- Children and Youth Safety (Minors on Campus)
- Public Safety (Clery Act)
- Regulatory Reporting
- Research
- Student Conduct
- Student financial aid (Title IV)
- Titles VI, Title VII, Title IX, Non-Discrimination

Temple's Program Plan outlines and describes the details of the Program, including key roles and responsibilities and Program attributes and activities. The Program Plan is intended to be dynamic, capable of adapting to changes in the implementation of an

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[1] Chapter 8 of the U.S. Federal Sentencing Guidelines describes requirements for a strong compliance program. U.S. Sentencing Commission, Federal Sentencing Guidelines Manual, Chapter 8. Additional detail is contained in the U.S. Department of Justice's "Evaluation of Corporate Compliance Programs."

effective compliance and integrity program, the university's mission, vision, values, and strategic goals, and the continually evolving regulatory landscape.

III.   Structure of Compliance Program

The Program is overseen by the Chief Compliance Officer with support from other university officials as noted below:

A. Board of Trustees – Compliance, Audit, and Risk Committee

   Consistent with oversight responsibility for university operations, the Compliance, Audit, and Risk Committee makes recommendations to the Board and acts on matters pertaining to the performance of the university's ethics and compliance Program. Specifically, the Compliance, Audit, and Risk Committee directs and oversees the university's internal audit, compliance, and enterprise risk management programs, the quality and integrity of the University's financial reporting systems and controls, and the University's commitment to meeting applicable legal, regulatory and policy requirements.

B. Management, Audit and Compliance Committee

   The Management, Audit and Compliance Committee provides central administrative support to and promotes excellence in the University's ethics and compliance efforts. Specifically, the Management, Audit and Compliance Committee provides support, advice, and guidance to the Chief Compliance Officer and Chief Audit Executive regarding the operation and structure of the Program; periodically reviews the status of the Program and provides recommendations for improvement; follows-up on reports of material non-compliance identified by the Chief Compliance Officer as requiring the Management, Audit and Compliance Committee's involvement; and reviews the status of the Enterprise Risk Management (ERM) initiative.

C. Ethics and Compliance Office

   To ensure effectiveness in preventing and detecting non-compliance, Temple's Ethics and Compliance Office is a centralized, independent function that reports to the university's Board of Trustees through the Compliance, Audit, and Risk Committee. Consistent with its Charter, the Ethics and Compliance Office provides oversight and guidance on university-wide ethics, compliance, and enterprise risk management activities, and fosters a culture that seeks to embed these disciplines

in all university operations and activities. The Ethics and Compliance Office promotes coordination of and consistency among university functions and units, covering a wide variety of compliance requirements applicable to academics, athletics, human resources, research, data reporting, information technology, and numerous additional administrative functions.

1.   Chief Compliance Officer

The Chief Compliance Officer is a senior, leadership-level official who reports to the Board of Trustees through CAR and administratively to the President. The Chief Compliance Officer oversees the Program, including coordinating between university departments and ensuring alignment with institutional priorities.

By working across departments and in close collaboration with the Office of University Counsel among other compliance partners, the Chief Compliance Officer supports a culture that leverages best practices and provides assurances that the University is meeting its commitments.

2.   Ethics and Compliance Office Staff

The Ethics and Compliance Office staff reports directly to the Chief Compliance Officer and assists in monitoring and implementing compliance objectives. Among other areas of responsibility, the ECO staff is chiefly responsible for ensuring compliance with the following:

- Conflicts of Interest
- Data Verification
- Enterprise Risk Management
- Federal, Commonwealth and City Reporting
- Administering Complaints and Inquiries (e.g., via Helpline)
- Investigations
- Child and Youth Safety (Minors on Campus)
- Policy Compliance
- Regulatory Reporting
- Training on Compliance-Related Topics

D. Compliance Council

The Compliance Council promotes awareness, coordination, and efficiency in the university's implementation of and adherence to compliance across the university, and reinforces the understanding that compliance is the responsibility of everyone in the university community.

The Compliance Council meets regularly throughout the year, and includes representatives (i.e., "Compliance Partners") from Athletics, ECO, Equal Opportunity Compliance, Facilities, Finance, Government Affairs, Internal Audits, Information Technology, Institutional Advancement, Operations, President, Provost, Public Safety, Research, Strategic Marketing and Communication, Student Affairs, Temple University Health System, Title IX and University Counsel.

E. Compliance Partners

Several offices and personnel at the university are responsible for ensuring compliance in their areas, and for coordinating with the ECO, as appropriate, for guidance and support. These are the university's Compliance Partners. University compliance partners are those individuals whose job responsibilities incorporate compliance as an essential or important part of job functions. They are charged with:

- Serving as subject matter experts, including remaining current with regulations and policies in their areas of focus;
- Completing all compliance obligations attendant to their roles (e.g., communicating with government agencies, submitting reports to third parties);
- Supporting students, faculty and staff in meeting applicable requirements including sharing changes in regulations and policies with others at Temple;
- Monitoring compliance and addressing questions, concerns, adverse events or incidents of noncompliance in their areas; and
- Reporting any concerns of possible noncompliance to the ECO.

For a matrix of Roles/Responsibilities of Compliance Partners, see Attachment A.

IV. Compliance Framework, Policies and Procedures

Temple promotes ethics and integrity through numerous outlets (e.g., training modules, employee/faculty/student handbooks, news articles, small and large group meetings, and conference sessions). Temple also publishes policies that offer guidance and standard practices for conducting the university's activities with honesty and integrity. Additionally, certain administrative areas (e.g., Information Technology, Faculty Affairs, Finance, Research, Environmental Health and Radiation Safety) may maintain discipline-focused operating procedures, best practices, and documents that refine internal unit guidelines and standards. These resource documents may be accessible directly from those offices and are reviewed on a periodic basis. These documents, as a whole, create a system of compliance and internal controls so that everyone can operate with the highest regard for ethical practice.

The goal of the Program, as represented in our policies and guidance documents, is to elevate Temple's reputation as a place where students, faculty and staff not only enjoy where they work but also take pride in the university and its culture. Violation of these policies and documents may lead to discipline of students, university employees including faculty, and volunteers who engage in unethical behavior. However, these standards, procedures, and policies should encourage commitment to ethics and compliance, overall, and more specifically to university standards and unit guidelines for performance and conduct.

With specific regard to third parties, university units are expected to understand the qualifications and associations of outside contractors, consultants, vendors, or agents. Any university unit using the services of a third-party entity should perform due diligence by conducting screening or vetting of contractors and agents using appropriate federal and state resources and university databases.

V.   Compliance Training and Education

Effective communication, education, and training are necessary to ensure that all campus constituents are knowledgeable and understand applicable laws, regulations and university policies that apply to them. Education and training are fundamental to raise awareness of ethics and compliance requirements, responsibilities in fulfilling the requirements, and the consequences of noncompliance.

Training and education are included as both educational and mitigation actions as part of the Program. General and specific training programs are provided so that Temple students, faculty and staff understand their legal and ethical obligations and responsibilities, as well as related risks, in the performance of their job duties and areas of expertise. Training and education programs also are utilized to manage required federal, state, or university certification requirements, provide updates on best practices, and provide awareness for regulatory or statutory changes, or even new business trends.

Temple provides required training for all university staff, faculty, and, in some cases, students covering key compliance areas. Temple also may provide tailored training programs for those in specific roles (e.g., research administrators, admissions officers, financial aid counselors).

To ensure participation, completion of training is tracked and failure to participate will lead to escalated reporting to supervisors and may result in limited access to university systems.

VI.   Review and Monitoring of Compliance

Many compliance partners are involved in ensuring monitoring and auditing compliance controls. See Attachment A for examples of compliance issues related to some of those university compliance partners and their areas of focus.

VII. Reporting Possible Non-Compliance

Temple University is committed to maintaining an environment where open, honest communications are the expectation, not the exception. Temple wants all members of the university community, regardless of their position, to feel comfortable in approaching a supervisor or manager with their concerns. Temple strictly prohibits any form of retaliation or retribution against any individuals who report, in good faith, an actual, potential or suspected issue regarding compliance with applicable laws or regulations or university policies.

Temple encourages anyone in the campus community to report concerns directly to a supervisor or manager through the offices responsible for reviewing those concerns. These offices include, among others, Ethics and Compliance, Athletics Compliance, Equal Opportunity Compliance and Title IX, Human Resources, Internal Audits, Research, Public Safety, Student Affairs, University Counsel or other responsible offices as appropriate.

Reporting compliance and integrity concerns also is available through the university's helpline, accessible at helpline.temple.edu, (800) 461-9330 (helpline phone) or (215) 253-5784 (helpline text). The helpline supplements existing reporting mechanisms and provides the ability to make anonymous reports. Individuals are not required to enter their name or contact information when submitting a report through the helpline. Anyone may also use the helpline to ask a question about university policy or related matters.

Individuals who are making a report to the university should provide as much information about their concern as possible so the university can adequately investigate and/or respond to the matter. Due to the nature of some reports, Temple may be limited in its ability to follow-up on anonymous reports where it cannot ask additional questions of the reporting party.

Temple is committed to protecting individuals who report concerns. If provided, the identity of any individual making a report will be treated as privately as possible. Reporting suspected violations of laws, policies, regulations or rules is a protected activity under federal and state laws, as well as university policy. Any adverse action (including intimidation, threats, or coercion) taken against an individual because the individual reported a concern constitutes retaliation and is prohibited.

VIII. Prevention, Response and Enforcement

As stated throughout this Plan, Temple is committed to a culture of compliance and ethical conduct. The university will maintain open lines of communication, including allowing for anonymous reporting of compliance issues on campus. In helping to achieve the Program's purpose, each office receiving a complaint of noncompliance must respond to that complaint promptly, either directly or by referring it to the appropriate office. These protocols are

intended to be responsive to immediate situations and to prevent similar offenses when compliance and integrity violations may be detected.

Following any incident of noncompliance, the appropriate University officials and the impacted unit(s) will engage in after-action reviews of how incidents were handled and identify any areas or opportunities for continual improvement.

To effectively identify and maintain Temple's Program and compliance landscape, Attachment A contains a matrix of issue types and the office(s) responsible for responding to complaints and inquiries in those areas. This matrix is a useful tool for ensuring compliance by the appropriate unit and individuals on campus. The matrix is regularly updated and should be consulted for the most current information.

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ATTACHMENT A – ROLES AND RESPONSIBILITIES MATRIX

Compliance Area	Compliance Example	Compliance Partner
Academic Affairs	Accreditation requirements (e.g., Middle States)	Office of the Provost
Disability Accommodations & Disability Resources and Services	Accessibility accommodations for students & employees	Students - Disability Resources and Services
		Employees - Human Resources
Athletics Compliance (NCAA)	Student-athlete eligibility & recruitment policies	Athletics Compliance Office
Children and Youth Safety (Minors on Campus)	Children and Youth Safety Program Compliance	Ethics & Compliance
Clery Act Compliance	Annual security report publication	Public Safety
Conflicts of Interest	Actual or perceived conflicts of interest (financial, gifts, nepotism, commitment)	Ethics & Compliance
		Office of the Vice President for Research (research-related conflicts)
Data Integrity	Factual statement or document containing statistical, demographic or numerically descriptive data (this includes, but is not limited to, statements made for purposes of encouraging attendance or donations to the university); and

Any data submitted to accreditation bodies, government entities or rankings organizations. | Ethics & Compliance |
Data Security & Privacy	Protection of sensitive data and research security (HIPAA, GDPR, CCPA)	Information Technology Services (ITS)
Discrimination, Harassment and Sexual Assault including Acts Falling Within Titles II, VI, VII and IX	Alleged violations of Policies Against Discrimination and Harassment, Sexual Assault	Equal Opportunity Compliance
Emergency Management	Campus emergency preparedness and response	Public Safety (Emergency Management)
Employment & Human Resources	Equal Employment Opportunity, FLSA, Drug Free Workplace Act, employee code of conduct, labor law adherence	Human Resources
		Equal Opportunity Compliance
Environmental Health & Radiation Safety	Hazardous waste disposal regulations	Environmental Health & Radiation Safety

Compliance Area	Compliance Example	Compliance Partner
Environmental Regulations & Safety	Laws and regulations related to energy consumption and pollution prevention	Campus Operations (Office of Sustainability)
		Environmental Health & Radiation Safety
Export Control	Compliance with ITAR, ORAC, and EAR for international research	Office of the Vice President for Research
Finance and University Controls	Adequacy of controls to detect and prevent fraud and abuse	Internal Audits
Student Financial Services	Federal Student Aid (Title IV) compliance	Student Financial Services
Foreign Gifts	Reporting Foreign Gifts (HEA Section 117)	Ethics & Compliance
Government Relations & Lobbying	Federal and State lobbying disclosure	Office of Government Affairs and Civic Engagement
Intellectual Property & Technology Transfer	Patent filings and licensing of university research	Office of the Vice President for Research (Technology Commercialization)
Legal Compliance	Legal claims and lawsuits; statutory and regulatory adherence	Office of University Counsel
Student and Employee Health Compliance	Health policies	Student Health Services
		Employee Health Services
Purchasing & Accounts Payable	Independent Contractors, contract commitment process, bidding requirements, vendor management	Finance (Purchasing & Accounts Payable)
Research Compliance	The Institutional Animal Care and Use Committee (IACUC), the Institutional Review Board (IRB), and the Institutional Biosafety Committee (IBC). Conflict of Interest in Research	Research Compliance
State Authorization Regulations	State Authorization Reciprocity Agreements (SARA) and state-specific education law	Temple University Online
Student Conduct	Student conduct and community standards, student rights and responsibilities	Student Affairs
Student and Exchange Visitor Program (SEVP) & SEVIS	Enrollment and visa status reporting for international students under F-1 and J-1 visa program	Global Engagement
Student Privacy (FERPA)	Ensuring student records confidentiality	Registrar

Compliance Area	Compliance Example	Compliance Partner
Tax Compliance	IRS reporting, UBIT, 501(c)(3) compliance	Finance (Office of the Controller)
Trademark and Licensing	Marks, logos, insignias, seal, designs and symbols	Trademark and Licensing
Veterans Affairs	Benefits and certifications for students using GI Bill or other military-affiliated aid programs	Military and Veterans Services Center