Temple University Ethics and Compliance Office Charter

1. Scope, Purpose, and Mission

Temple University's Ethics and Compliance Office (ECO) exists to support the university in achieving its academic, strategic, and business objectives by fostering a culture of integrity, transparency, and accountability, and by promoting adherence to applicable laws, regulations, strategic priorities, and university policies.

ECO provides leadership, oversight, and guidance with regard to ethics, compliance, and enterprise risk management across all university operations and activities. The Office seeks to embed ethical decision-making and a commitment to transparency into the University's culture by promoting consistency, coordination, and collaboration among diverse academic and administrative units including academics, athletics, human resources, research, data reporting, information technology, and other administrative functions.

ECO fulfills its mission through strong partnerships across the university community. By cultivating relationships grounded in trust and confidence with students, faculty, and staff, ECO works collaboratively to provide resources, guidance, and support that promote integrity, respect, and ethical conduct in all university activities.

2. Authority, Responsibilities and Operating Framework

This Charter establishes the authority, responsibilities, and operating framework of ECO. It aligns with the U.S. Department of Justice's Principles of Federal Prosecution of Business Organizations and the DOJ Criminal Division's Evaluation of Corporate Compliance Programs (2024), which emphasize three foundational questions in assessing program effectiveness:

- Is the compliance program well designed?
- Is the program applied earnestly and in good faith, with adequate resources and authority?
- Does the program work in practice?

ECO is responsible for ensuring that the University maintains a compliance program that meets these standards while supporting the University's core mission and strategic priorities.

3. Reporting Structure, Independence, and Staffing

The Ethics and Compliance Office ("ECO") operates as an independent, centralized compliance function of Temple University.

The Ethics and Compliance Office is led by the Chief Compliance Officer ("CCO"). The CCO reports functionally to the Board of Trustees through the Chair of the Board or the Chair's designee(s). Functional reporting includes responsibility for oversight of the effectiveness, independence and strategic direction of the university's compliance program.

For administrative and operational purposes, the CCO reports to and is supervised by the President of the university. Administrative reporting includes responsibility for ECO operations, the integrity and direction of the compliance function, budgeting, personnel administration, and institutional coordination, but does not impair the independence of the CCO's ability to communicate directly with the Board of Trustees.

To preserve the independence and effectiveness of the Ethics and Compliance Office, decisions relating to the appointment, compensation, performance evaluation, advancement, or termination of the CCO shall be subject to review by the Chair of the Board of Trustees or the Chair's designee(s).

The CCO shall:

- Maintain a professional staff with the size, expertise, and experience appropriate to the scope and objectives of the Ethics and Compliance Office;
- Provide periodic reports on compliance risks, program effectiveness, and investigations to the Board through its Compliance, Audit and Risk Committee, the President and others, as appropriate;
- Engage third-party resources, as appropriate, to supplement the capabilities of ECO; and
- Conduct regular assessments of the ethics and compliance program to identify opportunities for enhancement and continuous improvement.

4. Board Oversight

The Board of Trustees, through its Compliance, Audit, and Risk Committee, shall provide oversight of ECO. The Committee shall review and recommend to the Board the scope of ECO's duties and responsibilities. The Committee shall review and approve this Charter, as developed and presented by the CCO, and shall approve any revisions from time to time.

5. ECO Duties and Responsibilities

ECO shall establish and maintain a comprehensive ethics and compliance program appropriate to the size, complexity, and risk profile of the university.

**Approved by Board of Trustees Compliance, Audit and Risk Committee on June 23, 2026.*

In furtherance of this responsibility, ECO shall:

- Oversee and coordinate ethics, compliance, and related activities across the university in, among other areas, academics, financial integrity and procurement, athletics, data privacy and cybersecurity, employment and labor, civil rights compliance (including Titles VI and IX), student conduct, conflict of interest and commitment, and use of emerging technologies, including artificial intelligence;
- Develop and maintain effective lines of communication to promote awareness and reporting of compliance and ethics concerns;
- Maintain a compliance program plan that describes the structure and operation of the university's ethics and compliance program across all units;
- Provide advice, training, and education related to ethics, compliance, and data integrity;
- Collaborate with policy owners, as appropriate, to develop, revise, maintain, and manage university policies and procedures;
- Conduct internal monitoring, investigations, and compliance reviews in accordance with this Charter and applicable policies;
- Respond promptly to identified issues and ensure that appropriate corrective actions are implemented;
- Promote and support enforcement of standards through appropriate incentives and disciplinary measures, consistent with the employee handbook and other applicable policies; and
- Assess and measure the effectiveness of the ethics and compliance program.

ECO shall maintain and periodically update an inventory of offices with subject-matter-specific roles and responsibilities for compliance oversight, as set forth in Attachment A. Note: the inventory included as Attachment A is intended to be illustrative and not exhaustive, and acknowledges that additional university offices may carry subject-matter responsibilities consistent with the scope of this charter depending on the nature of their function.

ECO shall have primary responsibility for:

a. Investigations

i. Reporting and Conduct of Investigations

ECO shall support multiple avenues for reporting suspected non-compliant, unethical, or unlawful conduct. Reporting mechanisms shall include the ability to report concerns anonymously, without restriction, through a hotline. ECO may conduct investigations based on information received outside of the reporting system or on its own initiative.

ii. Referral to Appropriate University Offices

Matters requiring investigation shall be referred to the appropriate university office or function based on subject-matter responsibility, statutory authority, or organizational independence. ECO shall retain responsibility for maintaining the case file and for managing communications with anonymous reporters.

iii. Oversight of Investigations

ECO shall ensure that investigations are conducted fairly, objectively, timely, and in accordance with applicable university policies and procedures. Depending on the nature of the allegations, the individuals involved, and the potential impact on the university, ECO may directly oversee or manage an investigation in coordination with relevant university offices, unless otherwise required by law or policy. In all cases, ECO shall serve as a resource to support investigative efforts.

iv. Review of Prior Investigations

When allegations are raised that a previously completed investigation was biased, incomplete, or otherwise improper, ECO may review the investigative record to assess whether the investigation was impartial, conducted in accordance with university policy, and consistent with applicable due process requirements.

v. Root Cause Analysis and Corrective Action

ECO shall analyze misconduct to determine root causes and make recommendations regarding corrective actions as appropriate to promote fairness, consistency, and accountability across the university. Recommendations shall be communicated to those responsible for implementation, with notice provided to other appropriate stakeholders.

b. Enterprise Risk Management

ECO shall lead a university-wide Enterprise Risk Management ("ERM") program to identify, assess, prioritize, and manage institutional risks. Offices and functions with responsibility for substantive compliance areas shall participate in the ERM program and shall coordinate with ECO to identify, document, report, and mitigate risks.

c. Data Verification Unit

The Ethics and Compliance Office shall establish and maintain a Data Verification Unit ("DVU") responsible for verifying the integrity, accuracy, and consistency of externally published university data. ECO shall develop and implement procedures governing the nature, process, and scope of DVU review, including requirements for mandatory pre-publication review and DVU approval, as appropriate to support the university's commitment to accuracy, transparency, and accountability.

d. Civil Rights Compliance

ECO shall oversee and promote the university's compliance with applicable federal and state anti-discrimination laws and related institutional policies. This oversight includes, but is not limited to, reporting demographic and other information as required by federal and status authorities, conducting investigations to ensure adherence to relevant civil rights laws and regulations, and coordinating with designated university offices to ensure compliance as noted above.

6. Training and Education

ECO shall assist in administering a risk-based compliance training program that ensures members of the University community understand their responsibilities. Training effectiveness is evaluated through assessments, participation metrics, and feedback mechanisms.

7. Access to Information

To fulfill its responsibilities, the Ethics and Compliance Office shall have full, timely, and unrestricted access to all university records, documents, facilities, systems, and personnel necessary to conduct compliance assessments, training, monitoring, and investigations. ECO may grant access, limited in time and scope, to individuals acting at its direction. University administration shall ensure that all units and personnel cooperate fully and promptly with ECO in the performance of its duties.

8. Compliance Audits

ECO shall coordinate with and support the Office of Internal Audits to ensure that appropriate audits of compliance-related processes, controls, and procedures are conducted as necessary to evaluate the effectiveness of the university's ethics and compliance program.

9. Integrity and Confidentiality

Recognizing the sensitive and confidential nature of much of the information to which it has access, the Ethics and Compliance Office shall operate with the highest standards of integrity and shall safeguard confidentiality in accordance with applicable laws, regulations, and university policies.

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ATTACHMENT A – ROLES AND RESPONSIBILITIES MATRIX

The offices listed below have been identified as bearing primary responsibility for substantive compliance work in the subject-matter areas noted. This list is illustrative and not exhaustive. Additional university offices may carry subject-matter responsibilities depending on the nature of their functions. The identification of an office in this attachment does not expand or limit the authority of the Ethics and Compliance Office as set forth in this charter, nor does the omission of an office from this attachment relieve it of applicable compliance responsibilities.

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 (including, but not limited to, statements made for purposes of encouraging attendance or donations to the university); data submitted to accrediting bodies,	Ethics & Compliance

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Compliance Area	Compliance Example	Compliance Partner
	government entities or rankings organizations.	
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	Ethics & 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 Ethics & Compliance
Environmental Health & Radiation Safety	Hazardous waste disposal regulations	Environmental Health & Radiation Safety
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)

Compliance Area	Compliance Example	Compliance Partner
Legal Compliance	Legal claims and lawsuits; statutory and regulatory adherence	Office of University Counsel
Student and Employee Health Compliance	Health policies	Health and Well-being Division
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
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

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