

# Office of Compliance, Risk, and Ethics

# MONTGOMERY COLLEGE

## Compliance Matters

Spring 2019 Issue 2

### Ethics Climate Survey: Focused on Results

## FOCUS ON ETHICS

MC ETHICS SURVEY

In 2018, 971 people, 32% of College employees, responded to the Focus on Ethics survey. The results of the survey led the Office of Compliance, Risk, and Ethics (OCRE) to take action to respond to what we heard. We heard all different types of concerns. We carefully reviewed the survey findings and reflected on each and every comment. We determined some themes and trends from what employees shared in the surveys. **We heard you.** We value your opinions and thank you for speaking up!

So, what was done in response and what is planned for the future?

### In Response to the Survey Findings

The foundation of the Ethics program is the [Code of Ethics and Employee Conduct](#). In response to the survey findings, the OCRE led a collegewide effort the last academic year focused on ethics. Through the [FY19 required ethics trainings](#), over 1,269 employees have read and attested to the Code of Ethics, discussed what ethical expectations are in place for all employees, used a [decision-making framework](#) to navigate ethical dilemmas, and learned where and how to escalate concerns. As a result of the training, employees have been encouraged to speak up and have received resources to know what to do when they have a concern. With this year's ethics work that engaged employees at all levels, we now have a basic foundation for the ethics program to grow and take root.

In addition, College employees now have a [confidential reporting line](#) for escalating concerns of any type. These concerns are responded to within a goal time of 60 days. Employees can utilize the [Roadmap to Address Employee Issues](#) to gain guidance about the right place to bring concerns. The College also implemented policy [39003-Protection Against Retaliation](#) to protect employees who report concerns in good faith.

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Office of Compliance,  
Risk, and Ethics

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# Violence Against Women Act (VAWA)

## What Is VAWA?

The Violence Against Women Act (VAWA) was signed into law in 1994 to improve the nation's response to violent crimes committed against women, specifically domestic violence, sexual assault, and stalking. The law introduced tough new provisions to hold offenders accountable, combined with programs that improve and expand services for the victims.

The VAWA Reauthorization Act was signed into law under President Barack Obama to focus renewed attention and resources on college campuses, under the Campus Sexual Violence Act ("SaVE Act") provision, Section 304. This requires colleges and universities to document and report dating violence on campus and ensure victim's safety by mandating schools create plans to enforce protective orders and notify the victim of their rights. VAWA requires colleges and universities to:

- Report domestic violence, dating violence, and stalking;
- Adopt certain student discipline procedures, such as notifying victims of their rights; and
- Adopt certain institutional policies to address and prevent campus sexual violence.

## How Does VAWA Help Students?

Compliance with VAWA functions under the [Office of the Senior Vice President of Student Affairs](#) within the Student Health and Wellness (SHaW) Center's program for [Health and Safety Education](#). The VAWA coordinator, [Angela Dawson](#), works collaboratively with internal and external stakeholders to foster a culture of respect. In this role, Angela Dawson coordinates programs that promote prevention and awareness of sexual assault, domestic violence, dating violence, and stalking. Creating alliances with varied areas of the College is key to this work. The VAWA coordinator works in close consultation with [Christopher Moy](#), director of ADA compliance and Title IX, and [Kristen Roe](#), deputy Title IX and youth protection coordinator, to provide programming that aligns with best practices in the field.

Under VAWA, new students and new employees must be offered primary prevention and education programs that promote awareness of sexual assault, domestic violence, dating violence, and stalking. VAWA training programs and education opportunities help students to:

- Understand that Montgomery College does not tolerate sexual or domestic violence, or stalking.
- Understand the definitions of domestic violence, dating violence, sexual assault, and stalking.
- Understand the definition of consent as relates to sexual offenses and legally defined within the applicable jurisdiction.
- Learn "safe and positive" options for bystander intervention an individual may take to prevent harm or intervene in risky situations.
- Recognize the signs of abusive behavior and how to avoid potential attacks.
- Engage in ongoing prevention and awareness campaigns on sexual and domestic violence.

## Primary Prevention: Bringing in the Bystander

### How can we educate bystanders?

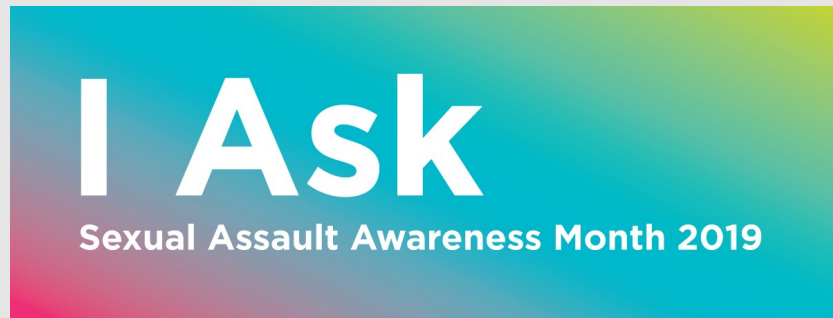
The Bringing in the Bystander (BITB) training program is an interactive 90 minute training, where students learn positive ways to intervene and address potentially abusive behavior.

Faculty may contact [Angela Dawson](#), VAWA coordinator, to arrange for a BITB trainer to deliver this training to students. BITB training is an excellent way to promote a culture of respect and empower a community of pro-social bystanders.

# April is Sexual Assault Awareness Month

April is [Sexual Assault Awareness and Prevention Month \(SAAM\)](#) and the College has been in full gear promoting important prevention and awareness activities collegewide throughout the month. All activities have occurred on all three campuses simultaneously with the help of volunteers.

Activities include Teal Tuesdays, Chalk the Walk, and [Denim Day](#). Teal Tuesdays occur on each Tuesday in April, and teal ribbons and resources have been handed out at special awareness tables. During Chalk the Walk on April 8 and 10, students were invited to write messages of awareness, hope, and prevention with chalk on designated sidewalks on the campuses. In addition, libraries will display SAAM resources, such as books, DVDs, and posters all month long in support of survivors and to educate the College community about sexual violence prevention and awareness.



## Join the Conversation: #SAAM #IAsk #Teal

The College community is encouraged to use social media hashtag **#SAAM** throughout April when posting about events or anything related to the awareness campaign.

The hashtag **#IAsk** can be used to promote and share consent-based messages.

On Teal Tuesdays, all are invited to share a selfie of their teal colors online and use the hashtags **#SAAM**, **#IAsk**, and **#Teal**.

## Sexual Assault Prevention for Community Colleges

The College has made available an online module tailored to two-year institutions, [Sexual Assault Prevention for Community Colleges](#). All students should be encouraged to complete the training. Faculty and staff are encouraged to incorporate it into their curriculum to boost participation.

*There will be special promotion of the online module in April during Sexual Assault Awareness Month. Students will be encouraged to complete this training in order to be entered into a prize drawing.*



## Spotlight: Vicki Duggan, Chief Compliance, Risk, and Ethics Officer



Compliance, risk, and ethics are the responsibility of each employee at Montgomery College. The [Office of Compliance, Risk, and Ethics](#) team spend their full attention each day taking care to plan and execute the College programs that help to protect and prevent the College from risk.

Ms. Vicki Duggan leads the office as the chief compliance, risk, and ethics officer. She has oversight responsibility for all the functions of the office including Compliance and [Ethics](#), [Title IX](#) enforcement, [Youth Protection](#), Enterprise Risk, [Internal Audit](#), and the Maryland State Ethics filing program. Vicki's responsibilities frame the work of prevention and protection of the College against risks that could negatively affect the College's overall success.

Vicki joined Montgomery College as a part-time faculty on the Germantown Campus over twenty years ago; in 1999, Vicki became full-time faculty. She has taught on all three campuses. Her accomplishments include receiving the AACCC/Microsoft Faculty of the Year Award for creating the Tech LEAP and GURL Power programs. Prior to 2012, when Vicki began her current role, she was the deputy chief information officer at the College.

There are many different components of the work of the Office of Compliance, Risk, and Ethics. We strive to be effective at all of our responsibilities, which rely on the good work of each and every employee to remain both compliant to the rules and true to College values. We strive to achieve the elements of an effective Compliance, Risk, and Ethics program, evidenced by the following:

- Employees know and follow the rules around their work responsibilities, whether it be federal or state law, College policy and procedure, or professional standards;
- The College's core values are articulated and consistently followed;
- Risks are intentionally assessed and managed, responsibility is assigned to mitigate the highest risks;
- The College trains employees to increase risk awareness and prevention;
- Employees are comfortable speaking up when they suspect wrongdoing;
- Employees are protected against retaliation for reporting suspected wrongdoing;
- Wrongdoing is investigated in a timely, fair, and objective manner; and
- Substantiated wrongdoing has an appropriate and consistent organizational response.

Vicki's role as the chief compliance risk and ethics officer has helped develop the foundational framework for compliance at Montgomery College.

### COMPLIANCE, RISK, AND ETHICS OFFICE Areas of Responsibility



## Going Forward—What Can You Expect?

For the future, we plan to administer the ethics survey again in FY20 to gauge employees' current perspectives. We would like to see increased participation and more awareness about the resources available to employees to address concerns. We also have reviewed trends in the data across *all* employee surveys and have specific strategies planned for the expressed concern areas of the College.

In the ethics training feedback, we heard that employees like the ethical scenarios used in the Focus on Ethics in-person training. As a result, in FY20, we will release a new set of ethical scenarios for employees to review or to discuss in small groups or in a team meeting. The scenarios will reflect the trending concerns, which are identified through multiple data points. Along with the scenarios, we will provide guidance to properly navigate through each scenario. We also will continue to offer specific ethics training and work toward recommendations that address identified concerns.

## The Compliance Annual Report

The [Compliance Annual Report for 2018](#) is now available. Check out the compliance accomplishments and the upcoming plans.

Know your compliance facts.

Compliance is everyone's responsibility!

## What Three Things Can You Do in Support of Our Ethical Culture?

**Take the surveys.** Speak your truth. Let us know what you think. We are listening.

**When in doubt, check it out.** Look for guidance through our College policies and procedures, departmental protocols, or management direction. You can always email or call the [Office of Compliance, Risk, and Ethics](#) directly. We will be happy to assist you.

**If you see something, say something.** Each employee has a responsibility to report suspected wrongdoing. You can talk to your supervisor, report to the [confidential reporting line](#), or contact the appropriate resource listed in the [Roadmap to Address Employee Issues](#). There are resources in place for you, so check them out. Speak up, make your voice heard!

## In-Person Ethics Training Updates

The Office of Compliance, Risk, and Ethics is offering training sessions in the Central Services Building during the spring 2019 semester. **Employees may enroll in these sessions through MC Learns.** These sessions are considered as opportunities to make-up the in-person ethics training for new employees or employees who missed the training offered through their departments.

Wednesday, May 1, 2019

1:30–3:30 p.m.

Tuesday, May 14, 2019

Noon–2 p.m.

Employees can contact [ethics@montgomerycollege.edu](mailto:ethics@montgomerycollege.edu) with additional questions.

# Updates: Human Resources and Strategic Talent Management

## Hiring A New Employee? Don't Forget about the I-9.

If you are hiring a student, temp, part-time faculty, or WDCE instructor and are unsure if the person is a new employee, please verify by [contacting Human Resources and Strategic Talent Management](#) (HRSTM) for assistance about their I-9 form.

Complying with the [Immigration Reform and Control Act of 1986](#) (IRCA) is a critical requirement for the College. This federal regulation requires new and returning employees to complete Section 1 of Form I-9 on their **first day** of employment. Then, HRSTM must complete Section 2 of the I-9 form within 3 business days of employment.

Failure to comply with this regulation may result in a fine for the College, and supervisors will be held accountable for violations of this federal regulation. Employees can access the [I-9 form and other new hire documents on the HRSTM website](#).

*It is important to note that under no circumstances should any individual start working without a completed I-9 form and an email notification from HRSTM that the new employee is cleared to start work.*

## New Payroll Direct Deposit Form

**The payroll direct deposit form has been updated!** Employees making changes to their direct deposit bank account are required to submit their change on the new form. Employees may access the [new direct deposit form on the HRSTM website](#). Please be sure to use the most current change form if there is a change to your direct deposit account in your future.

## Ethics Micro Learning: Reporting Lines and Retaliation

[Micro learning](#) provides an opportunity to learn more about critical ethics topics. Employees are encouraged to view short videos about confidential reporting lines and prevention of retaliation. The videos can be accessed on the [ethics website](#). Please note that employees must enter their MyMC credentials to view the videos. Micro learning videos are separate from the required ethics online training, which is accessible via MC Learns.

## External Audit or Review? Notify Internal Audit

**Please notify the Office of Compliance, Risk, and Ethics about any external audit firms requesting information from Montgomery College.**

Did you know that you must let us know whenever your department or program receives notification from any external agency, government entity, or other oversight body that requests compliance or monitoring visits, reviews, or audits? [Goli Trump](#), internal audit and advisory services director, can advise your department or program. In accordance with College Policy and Procedure [61005-Internal Audit](#), all external and internal audit reports must be sent to the chief compliance, risk, and ethics officer, and the responses must be reviewed by internal audit in order to ensure that the College responds appropriately to audit findings. The intent of this College practice is to best respond to external requests and to provide a level of objective and independent quality review. Please contact [Goli Trump](#) with any questions.

## Q & A—Is This a Conflict of Interest?

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**Q:** One of our College vendors has offered to pay for all of my travel costs—lodging, airfare, and meals—to attend a conference they sponsor. My unit does not have the available funds for me to attend the conference so this offer would make it possible for me to attend. I believe my attendance would benefit me and my ability to perform my job, but would accepting this offer be considered a conflict of interest?

**A:** Yes, this situation presents a conflict of interest and employees are not allowed to accept such an offer. The definition of a conflict of interest is a situation in which an individual has competing interests or loyalties. The vendor who is offering to pay your way to a conference will

likely compete for future business at the College and your judgment may be affected by your acceptance of the gift of your travel. Conflicts of interests can often present themselves between family members in an organization or when professional decisions are affected by the personal interests or relationships that result in conflicting responsibilities. Often, people will believe they can remain neutral and objective, but a *potential* conflict of interest can be as damaging as an actual conflict of interest. Employees may refer to the Policy and Procedure [31003–Conflict of Interest](#) for further guidance.

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## Office of Compliance, Risk, and Ethics

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