

Office of Compliance, Risk, and Ethics

MONTGOMERY COLLEGE

Compliance Matters

Fall 2017

Issue 1

Compliance and Ethics Week



Do what is right,
not what is easy.

— Anonymous

Montgomery College celebrates compliance and ethics week, October 2–6.

The level of integrity of organizations has gained worldwide attention—often for the wrong reasons. But increasingly, organizations are recognizing that a strong compliance and ethics program is not just a smart idea, it's healthy for the organization. To acknowledge the positive impact of corporate compliance and ethics on

organizations, Montgomery College is celebrating with a week of compliance and ethics activities.

During the week, Montgomery College will recognize and promote the importance of integrity, responsibility, compliance, and ethics to our mission. We hope you will show your compliance spirit by taking the time to participate in some of the fun activities. Drop by or participate in any of the events below to learn more; compliance begins with prevention and prevention begins with awareness!

- ♦ An ethics video contest for employees is underway. Vote for your favorite video on the [ethics website](#), October 2–6.
- ♦ **Compliance fairs on campus 11 a.m. to 2 p.m.**
 - Germantown—Monday, October 2**
 - Rockville—Tuesday, October 3**
 - TP/SS—Wednesday, October 4**
 - Central Services—Thursday, October 5**
- ♦ Raptor Hunt—Employees will receive daily e-mails with clues for a raptor hunt. A raptor will be hidden at a site on each campus, including Central Services.

The College's formal compliance and ethics program is in place to help to prevent and detect wrongdoing and promote ethical behavior. Most of the work done to assure a compliant and ethical workplace goes on without fanfare. During compliance and ethics week, let's all be sure to recognize the importance of compliance and celebrate the compliance and ethics values we work to uphold.

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**MONTGOMERY
COLLEGE**

New Code of Ethics and Employee Conduct

Montgomery College is committed to the ethical pursuit of the College's mission, vision, and goals. The College recognizes the importance of fostering and maintaining an ethical environment across the College community and has undertaken the development of an ethics program.

New Policy and Procedure

The Board of Trustees adopted the College Policy [31000-Code of Ethics and Employee Conduct](#), in June 2017. The Code of Ethics provides a significant opportunity for the College to express the standards established for ethical conduct. As a diverse and complex organization, the framework for ethical decision-making can be different from different perspectives. The expectations expressed in the policy help to focus the institution on our shared values. The expectations are as follows:



Source: www.wordclouds.com

Accountability: College employees will fulfill their roles and responsibilities to the best of their abilities. College employees will be personally accountable for the highest standards of moral and ethical behavior in all aspects of their work.

Civility and Collegiality: College employees will work together to create a culture of civility and inclusion built on trust, respect, and dignity for all.

Compliance: College employees will understand and comply with the codes, laws, regulations, policies and procedures that govern our College activities, as well as any standard of conduct and ethics required by professional associations of which the College or employee is a member.

Fairness: College employees will follow and execute the policies, procedures, and standards with objectivity and consistency, without discrimination or favoritism.

Honesty: College employees will be open, honest, and direct.

Respect: College employees will consistently treat all people and College resources with respect.

Stewardship: College employees will be prudent and responsible stewards of College resources.

More details about the evolution and background of the ethics program can be found on the [ethics website](#).

What's Next?

College Policy and Procedure 31000-Code of Ethics and Employee Conduct will serve as the cornerstone of the evolving ethics program at MC. This ethics program is being implemented by the Office of Compliance, Risk, and Ethics, in coordination with the help of other College units. The work to implement the ethics program will take place over several years and will involve all employees. Awareness efforts for the ethics program and Code of Ethics and Employee Standards of Conduct Handbook are underway. In addition, focus groups will be held to gauge the ethical climate of the College.

Changes to Background Screening for Employees

Clarification on Process for Initiating CJIS Background Screening in Compliance with MC's Policy & Procedure 75005-Protection of Minors

Please be advised that the youth protection coordinator, Kristen Roe, now has responsibility for and authority to initiate Criminal Justice Information Services (CJIS) background screening for current employees. CJIS screening includes fingerprinting and is required when an employee will have contact with minors. In the past, current employees have been directed to contact HRSTM to complete the process.

Note the following changes to the process:

- ⇒ All CJIS background screenings for current employees must be initiated through Kristen Roe, youth protection coordinator.
- ⇒ Employees will be issued a unique authorization form that indicates the College's intent for the screening to be conducted by one of our approved vendors.
- ⇒ All prior forms related to CJIS background screening are to be discarded. Only use those forms provided directly to you by the youth protection coordinator.
- ⇒ CJIS screening for new employees will continue to be initiated through HRSTM.
- ⇒ If you anticipate having contact with minors in relation to your work with the College, contact [Kristen Roe](#) directly to discuss authorization and procedures.

Welcome EthicsPoint: New Reporting Line

Employees with ethical concerns are encouraged to talk with their management. If contacting your supervisor is not possible or you wish to file a confidential report, Montgomery College is providing a new reporting line called EthicsPoint. EthicsPoint is a confidential and anonymous third-party reporting line replacing Red Flag Reporting. Please note that the Red Flag Reporting line is no longer available, and implementation of EthicsPoint is underway.

Toll-free Reporting: 844-572-2198
Online Reporting:
www.montgomerycollege.ethicspoint.com

New College Policy & Procedure on Volunteers

Last spring, the College implemented a new policy governing volunteers at the College. The policy was created to provide a consistent practice and set of expectations for volunteers and those that supervise them. The new College Policy and Procedure [39002-Volunteers](#), defines a volunteer as a person who performs a service in support of the College's mission without expectation or receipt of compensation, benefits, or consideration for the services provided.

The policy lays out the qualifications for volunteers, required action for volunteers who interact with minors, prohibited activities of volunteers, and clarifies the requirement to register volunteers with the College. [Lori Stegeman](#), human resources specialist, is the volunteer coordinator and should be contacted during the planning phase of any event utilizing volunteers. Volunteers and the departments that utilize the volunteer service must comply with all applicable College policies and procedures pertaining to computers or other electronic resources, key issuance, use of College vehicles, and other policies or procedures related to the volunteer assignment.

There is significant guidance in the volunteers procedure that will help you to proactively plan your volunteer experiences. Please review the policy and share it with your areas for their awareness and advance planning this upcoming academic year.

Data Classification



The College runs on data, and the amount of data is exploding into an institutional asset expanding in use, proliferation, location, and risk at an unprecedented rate.

The data asset is one of the most valuable assets controlled by Montgomery College. MC produces, collects, and uses many different types of data in fulfilling its mission. Laws and College policy mandate the privacy and security of differing types of data. Inherent in that privacy protection and security is the College's risk management of its reputation to its community of students,

staff, and public that share their data with the College. The classification of data into protection classes is the first step in determining the data's need for protection.

Equifax, one of the nation's three major credit reporting agencies, was breached by hackers sometime between mid-May and July 2017. The hackers accessed names, social security numbers, birth dates, addresses, and, in some instances, driver's license numbers and credit card numbers of over 143 million people.

The breach of these data assets by criminals highlights the various types of data that may be present in an enterprise like Montgomery College. The questions inherent in any data classification scheme are (1) who needs access to which data elements to complete their tasks as part of the mission at Montgomery College, and (2) how are those assets secured?

For example, social security numbers are often used in higher education as an identifier. The idea behind data classification is for each manager at the College to know who has access to specific data and to ensure that only those needing access have it. The concept of least privilege works at the College so that every person has access to the types of data they need, and no more, and only in the ways that least expose the data to potential loss or breach.

Data classification starts with the employee. All employees know what data they can access and which data they need to access to complete their work. Data classification is about constantly refreshing who has access to what data to keep the risk profile at a minimum.

There are no risk-free transactions in business, in life, or in higher education. What we hope to do by classifying data assets and protecting them according to their classification is to maintain the proper balance between the dictates of privacy and security and the mission to empower students to succeed.

For further information or questions about data classification please contact [Nell Feldman](#), IT security manager, or [Patrick Feehan](#), information security and privacy director.

Q & A—Reporting Fraud and Ethical Concerns



Q I have a concern about an incident of potential fraud or misconduct at the College and would like to make someone aware of it. However, what happens if I am the target of retaliation after I report my concern? What protections are in place for bringing forward a concern made in good faith?

A Employees are doing the right thing by reporting suspected fraud or other types of misconduct, and employees have an obligation to report when they suspect fraud or misconduct. The College has a policy that provides protection against retaliation for making a good faith report. See College Policy and Procedure [61008-Reporting Suspected Fiscal Irregularities or Fraud with](#)

[Whistleblower Protections](#). Also, see the new College Policy and Procedure [31000-Code of Ethics and Employee Conduct](#).

No individual, who, in good faith, reports a violation or suspected violation shall suffer harassment, retaliation or adverse employment, academic, or educational consequence.

See page 3 for more information about EthicsPoint, the College's new reporting line.

Office of Compliance, Risk, and Ethics

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**NOTE NEW OFFICE LOCATION in MK FOR
ADA COMPLIANCE/TITLE IX OFFICE**

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