



INSTITUTIONAL ETHICS AND COMPLIANCE COMMITTEE (ICC) CHARTER

The University of Toledo is a national, public research university where students obtain a world-class education and become part of a diverse community of leaders committed to improving the human condition in the region and the world.

Institutional Ethics and Compliance Mission

The Institutional Ethics and Compliance Program (Program) supports UToledo divisions as they work to promote a culture of ethical behavior and to ensure alignment with all applicable policies, laws, and regulations governing higher education, research, and healthcare. Additional information on the Institutional Ethics and Compliance mission is detailed in the [Program](#).

Collaboration and Communication

Recognizing our primary mission to foster collaboration and communication, the Institutional Compliance department is committed to an open and honest dialog with each of our institutional partners on all issues. Additional information on collaboration and communication is detailed in the Program.

Oversight

The oversight and structure of the Program shall be based on the guidance of both the U.S. Federal Sentencing Guidelines and the Office of the Inspector General for the U.S. Department of Health and Human Services. To ensure independence it shall be a free-standing program with the reporting relationships discussed herein. Additional information on oversight is detailed in the Program.

Institutional Ethics and Compliance Committee (ICC)

Responsibility for oversight of the Program and the execution of its Charter rests with the ICC. Additional information on the ICC is detailed in the Program.

Institutional Ethics and Compliance Officers

While University administration has full authority to determine the infrastructure that is appropriate to their needs, the importance of the ethics and compliance function is critical. An institutional ethics and compliance officer must have direct access to any officer or employee necessary to the efficient function of his/her program. In addition, each institutional ethics and compliance officer serves as the chair of the committee of his/her assigned regulatory area. Additional information on institutional ethics and compliance officers is detailed in the Program.

Standards of Conduct

Effective ethics and compliance programs begin with a formal commitment from executive leaders to foster a collaborative organizational culture that values the prevention and/or mitigation, detection and resolution of problems. All operating divisions shall adhere to the University's Standards of Conduct for all employees, students, and vendors. Additional information on the Standards of Conduct is detailed in the Program.

Education and Training

Education and training activities are a significant element of an effective ethics and compliance program. The Institutional Compliance department administers training to all employees and, as appropriate, the division's agents regarding alignment with relevant federal and state statutes, Board of Trustees' rules and regulations, and institutional policies and procedures. While ownership of the training component rests with University administration/senior leadership, each compliance department must play a key role in the development and oversight of the education and training function.

Investigations, Instances of Non-Compliance and Corrective Action Plans

Multiple University officials are empowered to investigate allegations of non-compliance at the University level. The Institutional Compliance department will collaborate and assist internal investigators on an as-needed basis. It will review the findings of investigations of noncompliance in order to make any necessary modifications to the Program. Each program administered by an institutional ethics and compliance officer shall require employees to report known or suspected violations to their supervisor and/or the committee that he/she administers. Each University leader shall take prompt and appropriate action upon receipt of information of possible wrongdoing to determine whether corrective action is needed. Institutional ethics and compliance officers or other management officials shall initiate the investigation. UToledo management should then determine whether a violation of relevant federal and state statutes, Board of Trustees' rules and regulations, or policies/procedures has occurred. If a violation has occurred, the necessary steps should be taken to correct the identified problem(s). In addition, UToledo should take reasonable steps to prevent further similar conduct and make any necessary modifications to the institutional compliance program.