University of Colorado Boulder
Ethics and Compliance Plan

December 10, 2015
University of Colorado Boulder Ethics and Compliance Plan

Norlin Charge: The university is not the campus, not the buildings on the campus, not the faculties, not the students of any one time — not one of these or all of them. The university consists of all who come into and go forth from her halls, who are touched by her influence and who carry on her spirit. Wherever you go, the university goes with you. Wherever you are at work, there is the university at work.

- University of Colorado Boulder President George Norlin

At the University of Colorado Boulder, our vision is for CU-Boulder to be a leading model of the “new flagship university” of the 21st century – by redefining learning and discovery in a global context and setting new standards in education, research, scholarship, and creative work that will benefit Colorado and the world. Underpinning this vision is our commitment to the highest ethical standards in all that we do. Inspired by our students’ Colorado Creed, we commit to act with integrity, courage, and respect.

Integrity: Make and implement decisions responsibly and with honesty, openness, and accountability

Courage: Work for the benefit of community health and welfare and the greater public good, especially in the face of adversity

Respect: Act with honor and fairness to create a trustworthy and equitable community

I. STANDARDS OF CONDUCT

In our academic, research, and creative pursuits, and in our daily work, we make decisions that have implications beyond ourselves. We have developed standards of conduct to serve as a resource for decision-making and to ensure that our students, faculty, and staff have the necessary tools to act ethically and in compliance with regulatory requirements. This Plan is a compilation of the many resources available to assist our community with decision-making and operations.

We are comfortable questioning and engaging with colleagues about the correct and ethical course of action under the law and under campus policy. However, even in the most well-intentioned circumstances, violations can and do occur. When employees are aware of violations, we take appropriate steps, including steps to self-report, seek guidance, or use the other reporting options listed below.

Our guiding principles, laws and policies are set forth in these documents:

- The University of Colorado Board of Regents Principles of Ethical Behavior
- System Employee Code of Conduct (to be published in June 2016)
- System and Campus Policies, including Campus Risk Management Policy
II. HIGH LEVEL OVERSIGHT OF THE PROGRAM - CU-BOULDER ETHICS AND COMPLIANCE FRAMEWORK

The Chancellor has established a framework of three groups to engage in and implement the ethics and compliance program (“Framework”). The Framework is referenced and described in this section.

A. Chancellor

The Chancellor is ultimately responsible for the campus ethics and compliance program and reports directly to the President of the University of Colorado System.

B. Chancellor’s Director of Compliance

The Chancellor’s Director of Compliance serves as a resource to the programs and executives making compliance management decisions. The director is responsible for developing and updating this ethics and compliance plan; staffing the Chancellor’s three ethics and compliance committees; and convening the teams that execute the action items from these committees. These committees are:

- Executive Committee on Ethics and Compliance
- Ethics and Compliance Steering Committee
- Campus Compliance Working Group

Membership for these committees appears at the end of this Plan.

C. Executive Committee

The Executive Committee members are the Chancellor, the Provost and Executive Vice Chancellor for Academic Affairs, and the Senior Vice Chancellor and Chief Financial Officer, as well as the Chancellor’s Director of Compliance and the Campus Managing Counsel.

III. LINES OF COMMUNICATION

The University of Colorado Boulder Framework follows the regular organizational reporting structures and it includes the complementary ethics and compliance committees listed below. The purpose of the committee Framework is to serve as a resource to decision-makers across campus who are grappling with new ethical questions, with competing values, and with questions that may test our ability to act with integrity, courage, and respect. Each committee has pledged to offer a collegial, collaborative, and transparent approach to resolving these challenging situations.

A. Ethics and Compliance Steering Committee

- Provide recommendations and advice to the Chancellor, Provost, and CFO.
- Develop the vision, mission, and goals for the ethics and compliance efforts.
- Guide and mentor the working group to help them focus their operational efforts
- Review the Campus Compliance Working Group (see next subsection III.B.) implementation goals and prioritization of their work.
• Champion and communicate the culture of ethics and integrity.
• When feasible, provide input on proposed campus responses to calls for comments in the federal regulatory review process
• Develop/approve a campus-based process to address new compliance requirements
• Meet twice a year and on an as-needed basis.
• Review gaps in the risk assessment process

B. Campus Compliance Working Group

• Implements the Chancellor’s charge, including the Enterprise Risk Management process for the campus.
• Provides recommendations and advice to the Executive Compliance Committee.
• Implements the vision, mission and goals for the campus operational “integrity” program.
• Identifies and prioritizes resource needs.
• Identifies educational and training needs.
• Champions and identifies other champions of the culture of operational integrity within sphere of influence.
• Coordinates, reviews, and implements compliance communications plan and activities including Chancellor messaging, compliance website, etc.
• Meets quarterly and on an as-needed basis.

C. Other Committees

1. Campus Risk Management Committee

The campus is just forming this committee. Membership will include several members of the Campus Compliance Working Group and 2-3 academic leaders to be identified.

2. Boulder Faculty Assembly

The Boulder Faculty Assembly serves as a voice for the faculty in shared governance. While the BFA does not have any legal or administrative responsibility for ethics and compliance, the BFA serves a critical role in shared governance and raising issues of concern to the Chancellor, Provost and Senior Vice Chancellor and CFO. As stated on the BFA website, “the BFA is proactively building engagement by putting in place initiatives that provide every member of the faculty with the opportunity to have their voice heard and participate in building the CU community.”

This faculty input is critical in identifying and addressing issues of ethics and compliance.

D. Office of the Provost and Executive Vice Chancellor for Academic Affairs
Our Division of Academic Affairs is responsible for meeting the academic mission of the University of Colorado at Boulder “to be a comprehensive graduate research university with selective admission standards offering a comprehensive array of undergraduate, masters and doctoral degree programs.” Our path in accomplishing this mission is articulated in the vision that the University of Colorado at Boulder will become a leading model of the “new flagship university” of the 21st century—by redefining learning and discovery in a global context and setting new standards in education, research, scholarship, and creative work that will benefit Colorado and the world.

1. **Office of the Vice Chancellor, Diversity Equity and Community Engagement**

Our Office of Diversity, Equity, and Community Engagement works to achieve our commitment to inclusive excellence and uphold it as a priority across our campus. The office fosters our vision for an inclusive campus climate and works with students, faculty, and staff to develop and implement the campus diversity and inclusive excellence plan. ODECE sponsors programs and activities to engage the campus and community members in valuing our common experiences and celebrating our differences.

2. **Office of the Senior Vice Provost and AVC for Budget and Planning**

The Senior Vice Provost and Associate Vice Chancellor for Budget and Planning provides support to the Provost and the campus with regard to resource planning and allocation of financial and physical resources for the academic and research enterprise.

This Senior Vice Provost participates in campus planning activities relating to tuition rates, financial assistance, graduate student support, academic buildings, space use, research infrastructure, and academic programs.

The Senior Vice Provost also works directly with faculty governance groups on campus. Additionally the Senior Vice Provost and budget office staff provide analysis and information services to enhance decision-making, planning, and policy formulation.

3. **Office of the Vice Provost and Associate Vice Chancellor for Faculty Affairs**

The Office of Faculty Affairs coordinates a variety of activities associated with faculty life and academic programming on the Boulder campus. The Office is a branch of Academic Affairs and is administered by the Vice Provost and Associate Vice Chancellor for Faculty Affairs.

The major functions of the Office of Vice Provost and Faculty Affairs include: recruitment, hiring, and appointments; reappointment, tenure, and promotion; post-tenure review; leaves, sabbaticals, and retirement; Academic Review And Planning Advisory Committee (ARPAC); Salary Equity Appeals Committee; faculty relations; processing faculty personnel actions requiring approval by the Board of Regents, President or Chancellor; Faculty Report Of Professional Activities (FRPA); junior faculty
mentoring and programming; faculty teaching excellence program; Leadership Education For Advancement And Promotion (LEAP); and faculty benefits and services.

Within all of these activities are elements of ethics and compliance and the office works closely with other offices to ensure education and awareness activities address these issues.

4. **Office of the Vice Provost and Associate Vice Chancellor for Undergraduate Education**

The primary assignment for the Office of Undergraduate Education, a part of the Provost’s cabinet, centers on responsibility for multiple campus-wide programs that are available to students regardless of school or college. These include the Office of International Education; the Student Academic Success Center; the Leadership Residential Academic Program, including the Chancellor’s Leadership Studies Program and the Ethnic Living and Learning Community Leadership Studies Program; Special Undergraduate Enrichment Programs (Norlin Scholars, Boettcher Scholars, Undergraduate Research Opportunities Program and Professional and Academic Conference Endowment); the Top Scholarship Office; the Presidents Leadership Class; the ALEKS math placement program, the Faculty Course Questionaire and all three ROTC units.

In addition, academically-centered complaints to legislators, the Board of Regents, the President, the Chancellor and the Provost are typically assigned to this office as a single point of contact for responses to include investigation and resolution, where possible. The Provost designated this office as carrying the primary responsibility for coordinating the multiple threads of efforts across the campus to produce a major improvement in our persistence and graduation rates as set by the Chancellor and the Provost.

5. **Ombuds**

The Ombuds Office is a confidential, impartial, informal, and independent problem-solving and conflict resolution resource for all members of the University community. It serves students, faculty and staff. The Ombuds Office provides a safe place to help individuals review options for managing or resolving interpersonal disputes and university-related problems. Rather than a compliance function, this office serves as a resource to the faculty, students and staff who need to raise compliance issues to other offices.

E. **Office of the Vice Chancellor for Student Affairs**

The first priority of Student Affairs is students' development as successful, intellectually curious learners, and as healthy, competent, active citizens of the world. In collaboration with other members of the campus community, Student Affairs provides educational opportunities, resources, and support to help each individual student reach his or her academic and personal goals. Student Affairs encompasses all the basic support services that enhance the classroom experience: where students eat, sleep, build community, and make friends; and where students can go when they need help.
Student Affairs includes over 1000 employees, including approximately 30 directors who oversee programs ranging from student health services to the UMC, Housing and Dining, and the Rec Center.

F. **Office of the Vice Chancellor for Research**

The Office of the Vice Chancellor for Research supports CU-Boulder's world-class research endeavors by serving as a focal point for investment in our campus’s research, scholarship, and creative works. The Vice Chancellor for Research strives to provide the infrastructure and administrative support necessary to promote and sustain the campus’s highly productive faculty and research programs.

   a. **Office of Research Integrity**

   The University of Colorado Boulder is committed to scientific and ethical integrity as well as academic excellence in all research activities which our students, faculty and staff undertake. The **Office of Research Integrity (ORI)** supports those needs in regards to:

   1. Animal Care and Use
   2. Office of Animal Resources
   3. Conflicts of Interest & Commitment
   4. Controlled Substances Used in Research
   5. Export Controls
   6. Human Research
   7. Research Misconduct
   8. Responsible Conduct of Research

The following offices also assist CU-Boulder researchers in ensuring compliance with federal regulations:

   b. **Office of Contracts & Grants (OCG)**

   OCG assists federally-funded PIs to comply with federal regulations in regards to property, travel, accounting, ARRA requirements, cost-sharing, and tech transfer.

   c. **Environmental Health & Safety (EH&S)**

   EH&S provides comprehensive services to minimize health and safety impacts to the campus and the greater Boulder community, in areas such as Laboratory Safety, Biological Safety, Radiation Safety, and Occupational/Worker Safety.

G. **Deans, Chairs and Institute Directors**

The Deans are responsible for promoting the campus ethics and compliance plan to the chairs and directors of their academic departments and units. They should ensure that department leaders engage their faculty, staff, and students in on-going discussions of ethics and compliance during which campus policies and procedures are clearly communicated. Deans should also communicate regularly with the Ethics and Compliance Steering Committee to share new ethical questions and issues that
arise in their departments and to ensure that they stay informed of new campus developments in ethics and compliance.

H. Graduate School

The University of Colorado Boulder is home to ten interdisciplinary research Institutes and a Natural History Museum, which functions much like an Institute. The Institutes, both individually and collectively, are one of the primary drivers of research on the Boulder campus, bringing together faculty, students, post-doctoral fellows, and other researchers in a myriad of interdisciplinary research projects that advance knowledge in areas as diverse of planetary exploration, climate and environmental science, problem behavior, and much more. The Institute Directors have a responsibility to ensure that the many researchers working in their Institutes are always in full compliance with all the requirements associated with sponsored research, and that they uphold the highest standards of integrity in the conduct of their work.

I. Office of the Senior Vice Chancellor and Chief Financial Officer

The Senior Vice Chancellor and Chief Financial Officer provides leadership in campus financial management, and in its operational and planning activities. The Senior Vice Chancellor Division includes the offices of the Vice Chancellor for Administration, the Associate Vice Chancellor and Chief Information Officer, the Senior Associate Vice Chancellor for Budget and Finance, the Vice Chancellor for Strategic Relations, the Assistant Vice Chancellor for Enrollment Management, the Executive Director of Real Estate Acquisitions, the Athletic Director, and their respective units.

1. Controller

Our Campus Controller's Office offers assistance and guidance in the management of the university's fiscal responsibilities. The Campus Controller's Office focuses on fiscal policies and guidelines which are intended to promote sound stewardship of the university's financial resources.

2. Human Resources

Our Office of Human Resources (HR) serves as a strategic partner to CU-Boulder, providing guidance and expertise in the management of campus human resources. HR’s Centers of Excellence offer a comprehensive set of services designed to attract, develop and retain an exceptional workforce. HR’s units include Recruitment; Position and Compensation Management; The Faculty and Staff Assistance Program; Organizational and Employee Development; and Employee Relations. HR provides oversight and guidance to the campus on personnel related compliance areas related to the Fair Labor Standards Act, the Family Medical Leave Act, Affirmative Action employer requirements and the Immigration Reform and Control Act, among others. Our Office of Employee Relations works with employees and supervisors to ensure that employees and departments understand their respective rights and
responsibilities as governed by University policies and procedures, state rules and regulations, and state and federal law. HR is committed to advising all employees in a fair and unbiased manner.

3. **Office of Information Technology**

With regard to ethics and compliance, the Office of Information Technology provides guidance and assists the campus to ensure that it complies with CU Information Technology policies. CU has established these policies to educate the campus community about the appropriate use of the campus computing and network resources.

4. **Planning, Budget and Analysis**

PBA assists the campus community, leadership, and constituents with accurate data/information to assist in making informed decisions affecting the University. We also provide accurate external reporting to various entities outside the University community. Additionally, this group provides the central budget and capital financing function for the campus.

5. **Enrollment Services and Financial Aid**

Enrollment Services at CU Boulder includes the Admissions, Financial Aid, and Registrar Offices. The Admissions Office practices holistic review of all freshman and transfer applicants, reading all applications to make admissions decisions using a variety of primary academic factors, as well as secondary factors related to the student’s experiences, unique contributions, academic disadvantage, and achievement beyond circumstance. The Admissions Office employs accepted industry standards with respect to fair and ethical recruitment practices.

The Financial Aid Office administers financial aid according to established federal, state, and institutional rules, regulations, laws, standards, policies, and guidelines. The Registrar’s Office oversees CU Boulder’s compliance with the Family Educational Rights and Privacy Act (FERPA). The security of student data is a top priority for all of these offices. We develop systems, policies, and procedures to ensure that the student data entrusted to us is protected according to all federal and state laws and institutional policies.

6. **CU Boulder Police Department**

The purpose of the University of Colorado Boulder Police Department is to support the University and its mission by providing public safety services that meet the unique needs of campus constituents.

7. **Staff Council**

According to their website, the “purpose of Staff Council shall be to represent staff employees of the Boulder campus by serving as a liaison to the UCB administration by recommending proposals designed to improve the status and protect the rights of staff employees and by fostering community engagement and enhancing employee morale. “Staff employees” is defined as all University of Colorado Boulder
employees who are designated as classified or university staff by the State of Colorado or the University of Colorado.”

Staff input is critical in identifying and addressing issues of ethics and compliance.

J. **Office of University Counsel**

The campus counsel’s office reports to the Vice President and University Counsel. Campus counsel attorneys practice higher education law and advise campus constituents on laws that impact a major research institution, including employment law, contract law, and real property law. In addition, the counsel’s offices represent the campuses in State Personnel Board and other administrative hearings.

K. **Office of Institutional Equity and Compliance**

The Office of Institutional Equity and Compliance reports to the Chancellor. It is committed to preventing and eliminating discrimination and harassment based on race, color, national origin, pregnancy, sex, age, disability, creed, religion, sexual orientation, gender identity, gender expression, veteran status, political affiliation, or political philosophy at the University of Colorado Boulder.

To achieve this mission, we conduct fair and unbiased investigations and treat all individuals who seek our assistance with respect and dignity. We also coordinate the provision of accommodations and interim remedies as necessary, and provide educational trainings and sessions for all members of the University community, including faculty, staff, and students.

L. **Youth programs**

The university has several programs which serve minors including our daycare program, Pre-collegiate Program, CU Science Discovery, Athletic Camps, Academic Summer Camps, and many others. While the university runs many of these programs, some are also run by third parties using our facilities. Our researchers also conduct studies that include children, with the consent of their parents.

Over the next year, the director of compliance will convene representatives of these programs to catalogue the list of programs, identify best practices, review current policies and procedures and make recommendations where we fall short of best practices.

M. **Athletics Office of Compliance Services**

The mission of the Office of Compliance Services is to promote the knowledge of and adherence of the NCAA and Pac-12 rules and regulations by the CU Community, amongst University employees (including especially Athletics Department employees), and student-athletes. The Office of Compliance Services monitors such rules and regulations, with a goal of reducing infractions that may otherwise occur.

IV. **REPORTING, NON-RETAILIATION, AND ENFORCEMENT**
The purpose of reporting is to correct and remedy violations especially those that relate to health and safety issues or issues related to the misuse of university resources. When violations do occur, we report:

- Criminal Activity
- Sexual violence, abuse, or harassment
- Child abuse of any kind
- Bias or discrimination
- Behavioral threat
- Suspected ethical or policy violations.

We are committed to protecting all individuals against retaliation.

Individuals can report concerns or potential violations as follows:

- **Supervisors** – this is the first option for reporting and where we can resolve the majority of issues.

- **Ethics Hotline** – The University of Colorado System operates an ethics hotline. The hotline provides a way to anonymously report concerns involving fiscal misconduct, violations of state or federal law, serious or recurring violations of university policy, or gross waste of university funds or property. The reporting service is provided by EthicsPoint, an independent company that provides similar services for hundreds of companies and universities. Options for 24/7 reporting are via a toll-free phone number (1.800.677.5590) or online (www.Ethicspoint.com).

- **CU Boulder provides “The Report It” website:** [http://www.colorado.edu/reportit/](http://www.colorado.edu/reportit/) to receive reports of possible bias-motivated incidents, sexual misconduct, gender/sexual harassment, protected class discrimination, and crimes. The website also provides access to additional reporting options and resources, including those regarding confidential assistance, reports to law enforcement, and Sexual Assault Nurse Examinations.

- The campus identifies other compliance issues through the following:
  
  i. Pre-employment Screening Process
  ii. Officer Disclosure of Interest
  iii. Employee Criminal Background Check

- We report criminal activity to the police.

V. **AWARENESS, TRAINING, AND EDUCATION**

We implement and ensure compliance with university policies and procedures and Regent, state and federal laws, policies, and regulations through our organizational reporting structure and we will begin
to include specific responsibilities in employee performance plans. We develop and continue to improve our policies, procedures and training programs to ensure expectations for ethical and compliance standards are adopted and clearly communicated.

We promote on-going dialogue and awareness of ethical and compliance issues each September during our annual “ethics and compliance” month. The Steering Committee on Ethics and Compliance and the Campus Compliance Working group sponsor dialogue around ethics and compliance issues. The campus also has many informal groups who exchange information related to ethics and compliance. For example, the Research Administrators Meet is an informal, grass-roots organization developed to facilitate networking, communication, and knowledge transfer by and between CU-Boulder Research Administrators.

Our communications strategy is attached to this report. In addition, units also offer subject-matter-specific training as follows:

- **Leadership and Management Curricula**

  HR’s Organizational and Employee Development provides ethics and compliance related training for supervisors, managers, and leaders through on-going employee development programs (currently *Managing the CU Boulder Way* and *The Highly Effective Manager*).

  HR also provides on-going training for campus employees. HR’s Organizational and Employee Development (OED) offers a range of training opportunities for employees of all classifications and coordinates the new employee orientation and onboarding programs. The Office of Employee Relations offers trainings and one-on-one sessions pertaining to employee rights and responsibilities, and state and federal laws and regulations. CU-Boulder’s commitment to ethics and integrity is integrated throughout HR’s training and educational programs.

- **Clery Training**

  On an annual basis, CUPD offers Clery Act Campus Security Authority training in-person and online to all Campus Security Authorities regarding responsibilities under the Clery Act and mechanisms in place to report Clery-related offenses. This training is provided in compliance with the mandatory training provisions of the Clery Act.

- **Discrimination and Harassment Training**

  All CU Boulder staff and student employees must complete an online discrimination and harassment workshop within their first 30 days of hire. All CU Boulder faculty members must complete an online discrimination and harassment workshop within their first semester of hire. After this initial training, all employees are required to complete a discrimination and harassment session at least once every five years. Our students receive similar training through our new student welcome program.

- **New Employee Orientation and On-going Training**
CU Boulder requires all new employees to take the online orientation training. The Office of Employee Relations provides trainings and works one-on-one with employees and supervisors to ensure that employees and departments understand their respective rights and responsibilities as governed by University policies and procedures, state rules and regulations, and state and federal law. We advise all employees in a fair and unbiased manner and treat all individuals who seek our assistance with respect and dignity.

- Research Compliance

ORI provides Responsible Conduct of Research education to inform all individuals engaged in the research process about the key issues, current standards, and best ethical practices in research. RCR imparts a broad set of guiding principles and behaviors on topics including:

- Mentor-trainee interactions and responsibilities
- Data acquisition, management, sharing and ownership
- Safe laboratory practices
- Publication practices and authorship
- Peer review
- Conflicts of interest
- Collaborative science
- Research misconduct
- Human subjects
- Animal welfare
- Export Control
- The scientist in society
- Research Misconduct

The University of Colorado is committed to the ethical and responsible conduct of research. The charge of the Standing Committee on Research Misconduct is to encourage a research climate that supports this goal, and to investigate allegations of misconduct in the research process.

- Athletics

The Athletics Office of Compliance Services, in conjunction with the Faculty Athletics Representative, strives to promote an atmosphere of compliance within the department and the surrounding community. Athletics staff, coaches, donors, and student-athletes are educated on a regular basis through numerous mediums, and as well as upon their entry to and departure from the University. Monthly and annual rules-education meetings, informational pamphlets, and nationally known “toilet tips” represent a large portion of the Office of Compliance Services’ educational efforts, but the staff also recognizes the influence that technology and social media have and continue to extend their educational plan to include those outlets.

VI. INTERNAL MONITORING AND AUDITING
• Self-audits

The campus engages in frequent surveys and self-assessments to identify areas for improvement and areas of strength. The campus also enters contracts for third party assessments of programs which require greater scrutiny, for example, the external review of our Title IX compliance in sexual assault cases, the review of the accessibility of our technology, etc. We also engage third parties to assist us in program reviews to identify areas where we can implement better business processes, which lead to higher compliance rates.

• Controller and Risk Management

The Campus Assistant Vice Chancellor and Controller is our campus liaison to the CU Internal Auditor. The controller assists campus departments with the audit process, which includes attending entrance conferences held by Internal Audit with the campus department, helping the department prepare the draft report to Internal Audit, setting realistic timelines and deliverables, etc. The Assistant Vice Chancellor and Controller also represents the campus at the Regent Audit Committee.

• Office of Internal Audit

The Department of Internal Audit provides independent, objective assurance and consulting activity designed to add value and improve the university's operations.

It helps the university accomplish its objectives by bringing a systematic, disciplined approach to the evaluation and improvement of university processes related to university-wide risk management, control, and governance.

The Department of Internal Audit is established within the University of Colorado by the Board of Regents. Its role and responsibilities are defined by the Board of Regents as set forth in the Internal Audit charter. The Audit Committee of the Board of Regents provides oversight of the Department of Internal Audit. The director of the Department of Internal Audit is appointed by the Board of Regents, reports functionally to the Audit Committee, and reports administratively to the president.

VII. CONTINUOUS IMPROVEMENT

CU Boulder is a community of problem solvers with a commitment to continuous improvement. When CU Boulder finds that actions or policies do not support its commitment to ethical behavior and legally compliant programs, CU Boulder works to remedy wrongdoing as quickly as possible, including actions ranging from employee discipline and termination; holding students, faculty and staff accountable in accordance with the applicable code of conduct; and revising policies and procedures to support this program.
University of Colorado Boulder
Executive Committee on Ethics and Compliance

1. Chancellor
2. Provost and Executive Vice Chancellor for Academic Affairs
3. Senior Vice Chancellor – CFO
4. Director of Ethics and Compliance
5. University Counsel

University of Colorado Boulder
Steering Committee on Ethics and Compliance

1. Bob Boswell Vice Chancellor for Diversity, Equity and Community Engagement
2. Philip Bradley Staff Council Representative
3. Melinda Piket-May BFA Chair
4. Deb Coffin Vice Chancellor for Advancement
5. Frances Draper Vice Chancellor for Strategic Relations
6. Terri Fiez Vice Chancellor for Research
7. Christina Gonzales Vice Chancellor for Student Affairs
8. Rick George Athletic Director
9. Elvie Henson Managing Senior Associate University Counsel
10. Dave Ikenberry Dean, Leeds School of Business
11. Bill Kaempfer Senior Vice Provost
12. Mary Kraus Senior Associate Dean, Arts and Sciences
13. Larry Levine Interim Vice Chancellor for Infrastructure and Safety
14. Louise Vale Interim Associate Vice Chancellor for Budget, Finance & Enrollment Svcs
15. Catherine Shea Chief of Staff and Director of Compliance
16. Randy Siders Executive Associate Director, Finance and Operations, LASP
17. Valerie Simons Executive Director and Title IX Coordinator
18. John Stevenson Dean, Graduate Schools
19. John Lurquin CUSG President of Student Affairs
<table>
<thead>
<tr>
<th></th>
<th>Name</th>
<th>Title / Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Maia Andreasen</td>
<td>Student Affairs, Chief Operating Officer</td>
</tr>
<tr>
<td>2</td>
<td>Ceal Barry</td>
<td>Senior Women’s Administrator and Associate Athletic Director</td>
</tr>
<tr>
<td>3</td>
<td>Larry Bell</td>
<td>Office of International Education</td>
</tr>
<tr>
<td>4</td>
<td>Abby Benson</td>
<td>Assistant Vice President for Government Relations</td>
</tr>
<tr>
<td>5</td>
<td>Brandon Boger</td>
<td>Environmental Health and Safety</td>
</tr>
<tr>
<td>6</td>
<td>Dave Danielson</td>
<td>Assistant Vice Chancellor for Facilities Management</td>
</tr>
<tr>
<td>7</td>
<td>Katherine Erwin</td>
<td>AVC and Deputy Chief Human Resources Officer</td>
</tr>
<tr>
<td>8</td>
<td>Bronson Hilliard</td>
<td>Assistant Vice Chancellor for Strategic Media Relations</td>
</tr>
<tr>
<td>9</td>
<td>Dan Jones</td>
<td>Director, IT Security</td>
</tr>
<tr>
<td>10</td>
<td>Alex Lloyd</td>
<td>Assistant Counsel, CORA, Advisory Role</td>
</tr>
<tr>
<td>11</td>
<td>John Meister</td>
<td>Director, Disability Services</td>
</tr>
<tr>
<td>12</td>
<td>Llen Pomeroy</td>
<td>Director of Investigations and Deputy Title IX Coordinator</td>
</tr>
<tr>
<td>13</td>
<td>Gwen Pomper</td>
<td>Assistant Vice Chancellor for Enrollment</td>
</tr>
<tr>
<td>14</td>
<td>Laura Ragin</td>
<td>Campus Controller</td>
</tr>
<tr>
<td>15</td>
<td>Frank Robison</td>
<td>Assistant University Counsel</td>
</tr>
<tr>
<td>16</td>
<td>Mike Roseberry</td>
<td>ADA Coordinator</td>
</tr>
<tr>
<td>17</td>
<td>Joe Rosse</td>
<td>Associate Vice Chancellor, Research Integrity</td>
</tr>
<tr>
<td>18</td>
<td>Pam Rosse</td>
<td>Director, Conflicts of Interest and Commitment</td>
</tr>
<tr>
<td>19</td>
<td>Catherine Shea</td>
<td>Chief of Staff, Chancellor’s Director of Compliance, Chair</td>
</tr>
<tr>
<td>20</td>
<td>Denitta Ward</td>
<td>Deputy Director, OCG</td>
</tr>
<tr>
<td>21</td>
<td>Kristi Wold-McCormick</td>
<td>Registrar</td>
</tr>
<tr>
<td>22</td>
<td>Melissa Zak</td>
<td>Chief of Police</td>
</tr>
</tbody>
</table>
VISION
We foster an ethical culture that is fully-integrated into all we do, in which we ask questions, raise issues, and address challenges in a supportive environment to advance the mission of the University.

MISSION
Over the next 3-5 years, we will develop a common understanding of ethical behavior within our campus community. We will raise awareness of ethical standards, conduct and compliance. We will engage the community in best practices by providing easy access to relevant tools and resources.

Goal 1: Create a common understanding of ethics and communicate this common understanding of ethics

Goal 2: Establish a culture of ethical decision-making
   Example of Step 1: Assess current culture to set a baseline
   Re-assess the culture to measure against the baseline

Goal 3: Develop and implement a plan for continuous education and awareness programs

Goal 4: Develop a tool set for people to address ethical questions