

STEVENS INSTITUTE OF TECHNOLOGY

Compliance Guide – 2018

Stevens Institute of Technology is committed to the highest standards of ethics and integrity. All members of our community are expected to help ensure that Stevens' activities are conducted in compliance with applicable laws, regulations and University policies. Keeping current with changes in the laws and regulations can be challenging, and it is important to know that there are resources available to help. This Compliance Guide sets forth the expectations of all members of the Stevens community with respect to compliance and identifies the key resources available in support of those obligations.

Stevens' Compliance Program

Stevens' compliance functions are integrated into the operational units across the University, with compliance subject matter experts located in various divisions and offices. This permits operational units to identify and respond to compliance issues quickly. The University's Office of Risk and Compliance (ORC), through the Chief Compliance Officer, oversees and coordinates compliance activities across the University and supports divisional leaders and subject matter experts. ORC helps to identify compliance risks and ensure appropriate controls are in place to meet the University's compliance obligations.

A number of Vice Presidents and other campus leaders, together with the Chief Compliance Officer, serve on the Risk and Compliance Steering Committee (RCSC), which meets at least quarterly to review compliance matters, identify compliance risks and assess the effectiveness of compliance programs in particular areas. The RCSC also advises the President and Cabinet on risk and compliance issues that may impact the University and recommends future initiatives to improve compliance performance and effectiveness. The Chief Compliance Officer updates the Board of Trustees' Audit Committee about significant compliance matters on a quarterly basis. In addition, a separate Risk and Safety Committee meets regularly to focus on compliance issues involving safety and health issues, and reports annually to the RCSC.

Making Compliance Part of Your Job

Every member of the Stevens community must consider compliance with laws, regulations and University policies as part of their job. All employees should become familiar with the policies found in the University Policy Library (<https://www.stevens.edu/about-stevens/university-policy-library>) as well as departmental policies and procedures relevant to their specific job responsibilities.

As you conduct your work, identify potential compliance and legal issues and reach out for help from others within your office and the University offices listed below on a regular basis. In determining whether your work presents legal or compliance issues, it is important to consult with personnel at Stevens who have experience and training in the law and compliance and have responsibility for making judgments about whether or not a legal or compliance issue exists.

Reporting ethical and compliance concerns

If you identify a compliance or ethical concern, you are encouraged first to consult with your supervisor or another colleague within your department who has relevant subject matter expertise. If, for any reason, you are uncomfortable discussing the issue with your supervisor or colleague, you should report your concern directly to the ORC, the Office of Human Resources, the Office of General Counsel or, depending on the subject matter, one of the other offices listed below. Alternatively, you should feel free to report the concern to the Compliance Hotline at <https://secure.ethicspoint.com/domain/media/en/gui/31028/index.html>, which may be used to report complaints or compliance problems on an identified or anonymous basis.

Signature Authority

As part of our compliance efforts, we should all ensure that any legal obligation entered into on behalf of Stevens – whether styled as an agreement, contract, memorandum of understanding or other form of document -- is given appropriate legal and/or other review and is signed by a person authorized to incur obligations on behalf of Stevens. The Board of Trustees has adopted signature authority resolutions that specify the employees who are authorized to enter into various types of legal obligations. These resolutions are available from the Office of General Counsel. Please pause before signing any legal obligation on behalf of Stevens to ensure compliance with these requirements.

Cooperation with Investigations, Audits and Inquiries

To assist the University in investigating or otherwise dealing with compliance matters, it is critically important that all members of the Stevens community comply promptly with any request or inquiry from the Office of the General Counsel, ORC or the Office of Internal Audit. All members of the Stevens community are instructed that they should – and should feel free to – promptly comply with any such request or inquiry (including requests for documents or materials that would otherwise be considered confidential) in a direct manner and without the need to first notify or involve a supervisor or other person.

Whistleblower Protection

Stevens has adopted a policy known as the Conscientious Employee or “Whistleblower” Protection Policy (<https://www.stevens.edu/about-stevens/university-policy-library/institutional-governance/ethics-disclosure>). Stevens will not take or permit to be taken any retaliatory action against an employee who reports a compliance concern as directed by this Guide.

Stevens' Compliance Resources

Stevens has a number of offices that are available to work with you to support legal, regulatory and policy compliance and you should feel free to contact any of them as questions arise. Below you will find contact information and a brief description of the functions of these offices:

1. **The Office of Risk and Compliance:** As Chief Compliance Officer, Fran Bouchoux is responsible for overseeing and managing Stevens' risk and compliance programs and ensuring that the University is upholding best practices and complying with all regulatory requirements and Stevens' policies. She works closely with University leadership in assessing compliance risks and coordinating compliance plans, and also serves as a resource for all employees who have questions about compliance.

Fran Bouchoux, Chief Compliance Officer
T: (201) 216-8568
fbouchou@stevens.edu

2. **The Office of the General Counsel:** The Office of the General Counsel (OGC) is led by Kathy Schulz, who is responsible for all legal affairs of the University and for identifying outside counsel to assist in particular matters. The Office consists of two attorneys and has experience in a broad range of legal areas. If you believe you have a legal or compliance question, please do not hesitate to reach out to this Office.

Kathy L. Schulz, Vice President, General Counsel and Secretary
T: 201-216-5667
Kathy.Schulz@stevens.edu

3. **The Office of Human Resources:** The Office of Human Resources is available for advice on human resources, compensation, benefits, ERISA, unionized labor and related matters. This Office is staffed with various professionals including a compliance expert who may be accessed by contacting Warren Petty, Vice President for Human Resources.

Warren Petty, Vice President for Human Resources
T: 201 216 5218
wpetty@stevens.edu

4. **The Office of Audit and Advisory Services:** This office, led by Dorothy Pearlman, works closely with the Office of Risk and Compliance and is involved in audits and investigations on particular compliance matters and serves as a resource on best practices and internal controls.

Dorothy Pearlman, Director of Audit & Advisory Services
T: 201-216-5179
dpearlma@stevens.edu

5. **The Office of Sponsored Programs:** The Office of Sponsored Programs (OSP) is responsible for administering Stevens' externally funded grants and contracts. Under the leadership of Barbara DeHaven, the Office is staffed by experts in research compliance, export control regulations and compliance with federal, state and local laws and regulations relating to sponsored programs as well as adherence to sponsor terms and conditions.

Barbara DeHaven, Executive Director of Sponsored Programs

T: 201-216-8762

Barbara.Dehaven@stevens.edu

6. **The Office of Environmental Health and Safety:** Under the leadership of David Fernandez, the Office of Environmental Health and Safety provides programs and services to address safety, health and environmental risks to faculty, staff and students with a particular focus on lab and fire safety.

David Fernandez, Director of Environmental Health and Safety and Insurance Risk Management

T: (201) 216-8705

David.fernandez@stevens.edu

7. **Procurement:** The Procurement Office works to acquire goods and services on behalf of the University for all purposes including educational, research and administrative purposes. This Office works closely with OGC and OSP to obtain legal advice where necessary and to ensure that procurement contracts comply with the requirements imposed on Stevens due to its status as a recipient of federal, state and local funds.

Brian Seabold, Interim Director of Procurement

T: 201-216-5133

bseabold@stevens.edu

8. **Title IX Coordinators:** Title IX of the Education Amendments of 1972 ("Title IX") prohibits discrimination on the basis of sex in educational programs or activities receiving federal financial assistance. Sex discrimination under Title IX includes sexual harassment and sexual violence. Stevens has appointed Xhiljola Ruci, Director of Community Standards and Title IX Coordinator, to lead Stevens' Title IX compliance efforts. In addition, Maria Ouckama, Assistant Vice President for Human Resources, serves as Deputy Title IX Coordinator and administers Title IX matters primarily with regard to Stevens' employees.

Xhiljola Ruci, Director of Community Standards and Title IX Coordinator

T: 201-216-3383

xruci@stevens.edu

Maria Ouckama, Assistant Vice President for Human Resources

T: 201 216 5146

mouckama@stevens.edu