BYU Integrity and Compliance Office Charter
September 2019

Purpose
Brigham Young University’s Integrity and Compliance Office (ICO) is designed to promote a culture of integrity and compliance at BYU and provide a systematic approach to evaluate and improve the university’s compliance with applicable laws, regulations, standards, and internal policies and procedures. The ICO supports the university’s commitment to “provide an environment . . . sustained by those moral virtues which characterize the life and teachings of the Son of God” and helps ensure that BYU activities adhere to the highest legal, professional, and ethical standards.

Mission
The ICO mission is to inspire members of the campus community to consciously comply with applicable laws, regulations, standards, and university policies in all their decisions and actions.

Objectives
In carrying out its purpose and mission, the ICO works with the university community to accomplish the following objectives:

1. Connect the campus community to information about their commitments, applicable compliance requirements, and ethical decision-making.
2. Support policies and processes that incorporate principles of ethical conduct and compliance requirements into day-to-day operations.
3. Assist BYU leadership and management in exercising their compliance oversight and carrying out their respective compliance responsibilities.
4. Prevent and detect conduct that would compromise BYU’s institutional integrity or compliance obligations.
5. Encourage ethical conduct and enforce compliance through appropriate incentives and disciplinary measures.

Responsibility and Services
The ICO is responsible to university leadership for independently overseeing and monitoring the university’s overall compliance and ethics program. This is accomplished through partnering with administrators, faculty, staff, and others affiliated with the university to offer education and training, assessment and monitoring tools, assistance with policy and process development, reporting channels, and investigative services. The ICO carries out its responsibility in the following ways:
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- **Communication and Training.** The ICO promotes a culture of integrity and compliance by communicating compliance standards and policies to the BYU community. ICO personnel maintain awareness of applicable laws, and the office facilitates regular, effective training opportunities. The ICO also supports and guides supervisors in managing compliance- and ethics-related issues, including conflicts of interest.

- **Monitoring and Assessment.** The ICO conducts continuous monitoring of compliance and also assesses program compliance with governing statutes, regulations, and policies. The ICO may also provide assistance when internal and external auditors perform audits of the university or when regulatory agencies investigate compliance.

- **Policy Management.** The ICO oversees the policymaking process at BYU and works closely with the President’s Council, which approves all official university policies. The ICO supports the President’s Council by coordinating the development, review, and approval of university policies and communicating policies to the campus community.

- **Reporting and Investigations.** The ICO maintains and promotes mechanisms for university employees and others to confidentially report concerns, violations of law or policy, or unethical behavior. In doing so, the office administers the university’s anonymous compliance hotline. The ICO is responsible for receiving and evaluating allegations that come to its attention, determining the appropriate investigative approach, and providing appropriate follow-up. Investigations are coordinated with and may use the resources of other university offices or the Church Auditing Department, as appropriate.

- **Risk Assessment.** The ICO identifies, prioritizes, and works with others to manage compliance risks.

**Reporting Results**

Results or information generated from ICO assessments, monitoring, and investigations are promptly reported to appropriate university administrative personnel. Significant issues are shared with the president, the Executive Risk Management and Compliance Committee, and the Church Audit Committee, as appropriate. When specific findings or issues of noncompliance are identified, management is responsible for developing and implementing necessary corrective action plans within a reasonable period of time after receipt of an ICO report disclosing those conditions. Members of the President’s Council are responsible to see that appropriate discussions are held to address compliance deficiencies in their areas. Corrective action plans may be submitted to the ICO for review and input; however, responsibility for compliance remains with the area/unit reviewed, not the ICO. The ICO may coordinate meetings to address institutional compliance issues and facilitate management decision-making. Plans or actions taken to correct reported conditions are reviewed by the ERMCC for satisfactory disposition.
Independence

To provide for the ICO’s independence, the chief integrity and compliance officer, who leads the office, reports directly to the president of BYU and administratively to the general counsel.

Authority

In order to meet its responsibilities and maintain independence, the ICO has access to all university records, data, documents, facilities, and personnel necessary to effectively carry out such functions as compliance assessments, training, audits, monitoring, and internal investigations. The ICO also has the authority, in coordination with University Communications, to send out campus notifications on compliance issues. University administration will ensure that units and personnel cooperate with the ICO in carrying out its compliance activities.

Confidentiality

Recognizing the private nature of the information to which it may have access, the ICO operates with the highest level of integrity and respect for the confidentiality of sensitive information.

Approved by BYU’s President’s Council on September 16, 2019