

2025 Annual Compliance and Ethics Program Report

EXECUTIVE SUMMARY

There are hundreds of federal, state and local laws that apply to the university, spanning research, health and safety, information, finance, civil rights, employment, athletics and global operations. Effective oversight of OSU's compliance and ethics program starts with the Board of Trustees. The annual compliance and ethics report provides guidance on oversight best practices, an update on the current compliance environment, and OSU's compliance priority areas, which for 2025-26 are: digital accessibility, research security, human resources, athletics, discrimination and harassment, data privacy and environmental health and safety.

BACKGROUND

The university compliance and ethics program serves the mission of Oregon State University (OSU) by promoting an organizational culture with the highest standards of integrity and by supporting compliance with applicable federal, state and local laws and regulations. The benefits of a strong compliance and ethics program include: creating and maintaining a healthy and safe environment for students, employees and visitors; ensuring the ethical and effective use of university resources; and improving operational efficiency and decreasing administrative burden.

An effective compliance and ethics program starts with a strong tone at the top that sets expectations and standards for all members of the organization. The "program" is not a single office; it is a coordinated network of dozens of subject matter experts – referred to as compliance partners – working across the institution in areas spanning research, health and safety, information, finance, civil rights, employment, athletics and global operations. There are hundreds of federal, state and local laws that apply to the university, and compliance responsibility is decentralized across functional areas at the university.

EFFECTIVE OVERSIGHT

Oversight of OSU's compliance and ethics program starts with the Board of Trustees (Board) via the Executive, Audit and Governance Committee (EAGC), which receives regular updates on audit, risk and compliance activities from the Office of Audit, Risk and Compliance (OARC), as well as from business units responsible for compliance areas. The executive vice president and provost co-chairs the quarterly Compliance Executive Committee (CEC) with the chief executive of audit, risk and compliance; other attendees include vice presidents and provosts with significant compliance functions reporting up through them, the faculty senate president, and the vice president and general counsel. The deputy chief executive of compliance and ethics provides leadership for the CEC, facilitating senior leaders' awareness and prioritization of critical compliance risks and mitigation efforts. The position functions as a hub for compliance subject matter experts across the institution in support of: growing the maturity of compliance programs in alignment with the elements of effective compliance (described below), supporting a compliance community of practice to share best practices and collaborate on common goals, and encouraging continuous improvement of operational processes to reduce administrative burden of compliance obligations.

Effective board oversight includes asking and confirmingⁱ,

1. Is the compliance and ethics program well designed?
2. Is the program being applied earnestly and in good faith?
3. Does the compliance and ethics program work in practice?

The federal government provides organizations with guidelines to measure effective compliance programs. These can be used to understand and assess the effectiveness of OSU's compliance and ethics program. The following elements, with standards adapted from federal guidanceⁱⁱ, provide the infrastructure for building a strong compliance program that works to prevent incidents of non-compliance – and has systems in place for responding to, and learning from, incidents when they do occur.

Elements of effective compliance

- Leadership and oversight: Effective leadership, functional committees, and appropriate subject matter expertise are in place.
- Risk assessment and mitigation: Risks of non-compliance are identified and assessed, and resources are devoted to appropriate mitigation of those risks.
- Policies and procedures: Clear expectations and practical guidance regarding behavior and decision-making are available and accessible.
- Education and outreach: Reasonable steps are taken to provide appropriate, relevant, and comprehensive education and outreach about compliance requirements.
- Monitoring and auditing: Effectiveness of programs and adherence to compliance requirements is monitored. Emerging and changing laws and regulations are tracked.
- Receiving reports and investigating incidents of non-compliance: Clear avenues exist to seek guidance or report violations of policy and relevant laws and regulations. Investigations follow appropriate processes and emphasize non-retaliation.
- Accountability, incentives and corrective action: Community members are encouraged to behave ethically and responsibly. Appropriate and consistent actions are taken in cases of wrongdoing.
- Response and prevention: Episodes of misconduct and violations of laws, regulations and policies are responded to appropriately. Systemic issues are identified, root causes determined, and solutions implemented to prevent recurrence.

These elements of effective compliance apply at the macro level for the university-wide compliance and ethics program, as well as at the micro level for specific compliance areas. They provide the foundation and scaffolding for the work of all compliance areas across the university.

COMPLIANCE ENVIRONMENT & PRIORITY AREAS

Higher education is experiencing the effects of changes to and from federal regulatory agencies. Shifting enforcement priorities, changing funding requirements, and new regulatory interpretations and requirements have kept many OSU compliance offices on their toes this year – including, but certainly not limited to, those responsible for financial aid, sponsored programs, research integrity, disability access, athletics, and international visas.

OSU has also had many internal changes. This summer, we wished Patti Snopkowski, longtime chief executive of audit, risk and compliance, a well-earned and happy retirement; and we welcomed Roy Haggerty back to OSU in his new role of provost and executive vice president. Those two positions co-chair the Compliance Executive Committee. Compliance leader Tom Doyle, executive director of Environmental Health and Safety (EH&S), retired in March, and Heather Horn, chief human resources officer, left in August. A new vice provost for enrollment management, Nechell Bonds, started this summer; the division of finance and administration, led by Carla Ho'a, underwent an organizational reorganization; and the equal opportunity and access office shifted to report to Scott Vignos in his new role as vice president for mission and impact. There have been vacancies and searches for compliance subject matter experts, including in records retention, which reports to the libraries; occupational safety, in EH&S; and in Athletics compliance. The deputy chief executive of compliance and ethics, OGC, senior leaders and compliance subject matter experts are providing additional compliance support in these areas, as needed.

Progress continues to be made on the compliance and ethics three-year strategic action plan, which continues through 2026. Most action items are multi-year efforts. This year, an employment compliance maturity risk assessment was completed, compliance trainings were assessed for inclusion in an enterprise learning management system, and ethics outreach related to endorsement of private companies was conducted in collaboration with University Relations and Marketing. A follow-up self-assessment of university internal investigation offices was completed this year (previously done in 2022), and OARC and OGC co-sponsored multi-day training for eight internal investigation offices, with ongoing support for employment investigations.

Annually, compliance priority areas are selected based on the following criteria: changes to federal or state laws and regulations; recent or anticipated legal, regulatory or audit findings or actions; shifts in internal resources or organizational structure; and other operational, financial, reputational, and/or strategic risks. Most priority areas remain on the list for multiple years. Some compliance priority areas are also university Enterprise Risk Management (ERM) topics. OSU's compliance priority areas generally align with those of higher education across the country. Ongoing assessment is done throughout the year to identify new or changing risks and to reassess compliance priority areas. Compliance priority areas are owned by one or more functional compliance areas and receive extra support from the deputy chief executive of compliance and ethics and OGC; critical updates are provided quarterly to the CEC.

Compliance priority areas for 2025-26

- 1) **Digital accessibility.** A new federal rule under Title II of the Americans with Disabilities Act (ADA) requires adherence to digital accessibility technical standards that provide the disabled community a proactively accessible and equitable experience in the digital environment. Requirements go into effect in April 2026 and cover websites, web and mobile apps, electronic documents hosted on websites or mobile apps, digital course and instructional materials, and social media posts. A cross-divisional steering group and action teams are coordinating university-wide communications, resources and support for the university community to comply with these new federal requirements.

- 2) **Research security.** The federal government continues to raise concerns about countries of concern inappropriately influencing the U.S. research enterprise or gaining access to sensitive research information or intellectual property. Areas of focus include inappropriate sharing of information, data breaches, contract noncompliance, conflicts of interest, and national security. The Division of Research and Innovation leads compliance efforts, working closely with UIT. The university's cross-divisional global engagement compliance committee meets monthly to track new requirements, and to assess existing, and implement new, university compliance policies and practices.
- 3) **Human Resources.** Dozens of federal and state compliance requirements are owned by, or require close coordination with, the Office of University Human Resources, including: criminal background checks, equal pay, discrimination or harassment sanctioning, employee eligibility, employees located internationally and outside of Oregon, conflicts of interest and commitment, employee manuals and policies, labor union negotiations and contracts, talent management including recruitments, and more. An inventory and assessment of employment compliance requirements was conducted this year, and employment investigation procedures are being reviewed and aligned to best practice.
- 4) **Athletics.** Rules and regulations of the federal government, NCAA, College Sports Commission and PAC-12 cover student-athlete recruiting, financial aid, personnel, eligibility, transfers, and more. The recent *House v. NCAA* settlement has resulted in institutional issuance of revenue sharing agreements to domestic and international student-athletes, roster limitations, and regulation of student-athlete private business activities associated with use of their name, image and likeness (NIL). An Athletics update is scheduled for the May 2026 Board of Trustees meeting.
- 5) **Discrimination and harassment.** *Previously Title IX.* Multiple federal laws protect people from discrimination and harassment based on protected status, including but not limited to race, color, national origin, sex, religion, age, disability, and veteran status. Prohibited actions include those that exclude an individual from participating in, or receiving the benefits of, any university program or activity for which they are otherwise eligible. Actions may not otherwise adversely affect a term or condition of an individual's employment, education, on-campus housing, or participation in a university program or activity. The federal government's interpretation and enforcement focus for discrimination and harassment has shifted towards race, national origin, shared ancestry and religion. University policies and practices align with federal requirements across all protected status areas. OSU will give focused attention to the federal government's priority areas while maintaining ongoing focus on sex discrimination and sexual misconduct.
- 6) **Data privacy.** Various laws cover the need, collection, use, and sharing of personal data; notice given to, and consent received from, individuals; retention and destruction of data; and notification and other requirements if data is stolen or compromised. Areas include: Family Educational Rights and Privacy Act (FERPA) and student records, Health Insurance Portability and Accountability Act (HIPAA) and healthcare transactions, Gramm-Leach-Bliley Act (GLBA) and student financial information, international privacy laws such as European Union General Data Privacy Regulations (EU GDPR), 3rd party vendor contracts, and the evolving use of AI. The compliance and ethics program three-year plan includes exploring options to train or hire a university subject matter expert on privacy.

- 7) **Environmental Health & Safety.** *New area for 2026.* Environmental Health & Safety (EH&S) provides training, consultation, and services to the university community on regulatory requirements established at the local, state and federal level. Compliance areas include occupational, biological, radiation, hazardous waste, extreme heat, wildfire smoke, and field safety, among others. Lab safety, which broadened to workplace safety as lab safety improvements were made, was an Enterprise Risk Management (ERM) item from 2018 – 2023 and removed due to progress made. EH&S has been added to the compliance priority area list due to staffing and reporting line changes in the past year.

ⁱ Three questions from the U.S. Department of Justice [Evaluation of Corporate Compliance Programs](#), Updated September 2024

ⁱⁱ United States Sentencing Commission, 2021 Guidelines, [§8B2 Effective Compliance and Ethics Program](#)