
College Compliance Policy

Purpose:

The purpose of this policy is to establish the framework for the Bergen Community College ("Bergen" or the "College") compliance program, define key institutional expectations, and clarify the obligations of all College personnel to understand and adhere to applicable federal, state, and local laws, regulatory mandates, and internal institutional policies.

Compliance is foundational to every aspect of College operations. A robust culture of compliance safeguards the institution's mission, ensures operational integrity, and fosters an environment of transparency, ethical conduct, and mutual accountability across all academic and administrative units. As a core component of Bergen's risk management strategy, the compliance program proactively identifies, assesses, and mitigates risks associated with institutional noncompliance.

This policy serves as the primary foundational umbrella for compliance oversight across the College. Specific regulatory obligations are governed by dedicated, subject-matter-specific College policies.

Scope - Who Should Read This Policy:

All faculty and staff

Definitions:

Culture of Ethics and Integrity

Organizational culture that is committed to doing the right thing all the time in an uncompromising manner, embodied by the words and actions of all personnel. It forms the basis for all interactions between employees and others who interact with the institution. An ethical culture is based on a set of values that are shared and held by the entire institution and represents a mindset where individuals understand the importance of acting in accordance with laws, policies, and procedures. A culture of integrity is based on individuals who demonstrate respect for others, take their commitments seriously, and are accountable for their actions and results. Ethics are principles that guide behavior, while integrity is the way ethical principles are carried out.

Compliance

The act of conforming to and complying with established standards, rules, laws, regulations, policies, and procedures that help to mitigate risk to an organization. The scope and focus of compliance are tactical in nature and consist of two components:

- **Organizational/institutional compliance** - the actions and programs an institution implements to ensure compliance with internal policies and procedures, in addition to external regulatory compliance requirements.

- **Regulatory compliance** - the steps an institution takes to comply with applicable external laws, regulations, and guidelines that are components of an institution's overall organizational compliance responsibilities.

Compliance Program

A system of processes, policies, and procedures developed to ensure compliance with all applicable laws, regulations, contracts/agreements, and institutional policies and procedures, with an oversight function focused on maintaining such compliance. An effective compliance program can minimize legal, financial, operational, and other risks of noncompliance.

Risk Management Framework

The process of identifying, assessing, and managing potential threats and risks that could damage an organization's reputation, operations, and earnings. Risk management is more strategic in nature, forecasting the impact risks will have on an organization, and how to minimize such risk. It includes plans to increase awareness around potential threats and how to avoid them, and to prepare for the unexpected by minimizing issues before they occur.

Noncompliance

The failure or refusal to adhere to and comply with laws, regulations, policies, procedures, or contract/agreement terms, which may be intentional, due to an oversight, or due to a lack of knowledge or understanding of the requirements.

Policy Statement:

The College maintains a culture of ethics and integrity and is committed to conducting its operations in an ethical and transparent manner. This commitment promotes a culture that is focused on responsibility, doing the right thing, and adhering to laws, regulations, and college policies. The constantly changing environment in which the College operates requires an ongoing focus on and attention to compliance and the minimization of risk associated with noncompliance. Bergen is committed to complying with the requirements of all external laws and regulations and internal policies that pertain to its operations, programs, services, and activities and has zero tolerance for noncompliance with such requirements. The College's compliance program is evaluated by the Office of College Compliance and supported by the Board of Trustees, President, and Executive Team.

The College's compliance program/framework includes the following elements:

- Designated Compliance Office – function charged with compliance program oversight and management.
- Documented policies, procedures, and controls – established rules and expectations of the College.
- Education and training – programs that properly train the College community on relevant external laws and regulations, and internal policies and procedures.
- Reporting mechanism – process or system which captures and maintains reportable events, incidents, misconduct, and noncompliance. Also used for tracking and reporting compliance program effectiveness.
- Risk assessment, monitoring, review, and audit function - periodic reviews and evaluation of the compliance program of the College as a whole and of the individual academic programs and administrative departments.
- Enforcement, buy-in and support – the support and buy-in by all leadership and personnel of the College's compliance program which is fundamental to the success of the institution, which includes consistent and proper monitoring and the identification of noncompliance matters so that they are addressed in a timely manner.
- Prompt response and investigation – the timely identification, investigation, and resolution of reported compliance issues.

Compliance Responsibilities

Adherence to organizational and regulatory compliance requirements does not lapse due to changes in leadership or personnel of the College. Compliance is a continuous, ongoing, and shared responsibility of all members of the College community.

Procedural Reference

Applicable Federal and State Acts, Laws, and Regulations

Related Documents/Forms/Policies:

Policy History:

Adopted: 10/13/2026

Amended:

Reviewed: