



Compliance Training Policy

Definitions

Term	Definition
College	The State University of New York at Potsdam.
Employee	A public employee working for The College, a Research Foundation employee associated with The College, or a PACES employee associated with The College.
Supervisor	Any person assigned as a supervisor of record within The College who has the authority to direct and control the work performance of an employee.
Volunteer	An individual who has been approved by The College and has approval on file with Human Resources to perform a specific College function, this may include students.
Compliance Training	The process of educating employees about laws, regulations, or policies required for employment. Trainings may be offered through online or traditional, in-person instruction.
College Affiliated Organizations	PACES, The Research Foundation.

Basis for Policy

The objective of the Compliance Program is to implement and maintain a systematic organization-wide approach for identifying, assessing, and managing risks. This process ensures adherence to applicable laws, rules, regulations, policies, and procedures and preserves our reputation for integrity and excellence. To achieve these objectives, SUNY Potsdam has developed a Compliance Program that structures compliance obligations and proactively mitigates the risks for fulfilling these obligations in a consistent manner. This procedure outlines the steps the college will take to ensure employees complete these trainings.

All employees are required to complete compliance trainings mandated by the Federal Government, New York State, the Board of Trustees of the State University of New York, and the College, itself. All employees are required to complete mandatory compliance training on a timely basis.

The Compliance training has been established specifically to:

- Establish a cohesive structure for compliance training
- Communicate the Campus commitment to compliance and the expectations of the employees to complete compliance training

- Promote an ethical and compliant culture and behaviors
- Provide direction and guidance on compliance training
- Establish the importance of compliance processes and procedures as well as keeping up with the changing regulatory laws, rules, policies, and procedures

Responsibilities

All Employees: Responsible for completing all assigned compliance training by the communicated due date. These trainings will consist of learning initiative modules that will include a combination of videos, contact lists and policy documents. The contact lists and policy documents must be downloaded and viewed along with the videos for the training to be considered complete.

Supervisors/ Directors/Deans/ Vice Presidents: Responsible for ensuring compliance of employees within their department(s) and/or division.

President: Responsible for directing employees to complete overdue trainings.

President's Designee (Human Resources): May invoke the disciplinary process in accordance with applicable collective bargaining agreements.

Procedures

Initial Action:

- Employees will be informed of training completion requirements and due dates upon the assignment of the training.

Action taken 1 week before training is due:

- Before the training is due, the employee will be sent a reminder that the training is coming due.

Action taken 1 week after training was due:

- One week after the training was due, employees who have not completed all assigned trainings will receive a first reminder to complete the training.

Action taken 2 weeks after training was initially due:

- Two weeks after the training was initially due, employees who have not completed all assigned trainings will receive a second reminder to complete the training.
- A supervisor's first notice will also be sent, at this time, with the names of all employees who have not completed the compliance training.

Action taken 3 weeks after training was initially due:

- Three weeks after the training was initially due, a second notice with a list of all employees who have not completed their training will be sent to their immediate supervisor.
- Supervisors of delinquent employees should make every effort to ensure their employees comply by providing the appropriate space and equipment and work time. Employees

evaluations should address issues with non-compliance. Supervisors should contact Human Resources with questions.

Action taken 4 weeks after the initial training was due, if Supervisor is unsuccessful:

- If these measures remain unsuccessful, the respective President’s Council Representative will be notified and should direct the employees to comply with the training requirements.

Action taken if President’s Council Representative is unsuccessful:

- After one attempt by the President’s Council Representative, Human Resources will provide the employee’s name to the President’s Office.
- The President’s Office will then direct the employee in writing to complete the training by a specific date and time.

Action taken if employee is still non-compliant:

- If the employee continues to be non-compliant, a referral will be made to the Associate Vice President for Administration and Human Resources.
- Any employee who continues to be non-compliant may be subject to disciplinary action in accordance with their collective bargaining agreement.

For any further questions concerning compliance training or the compliance training policy, please contact the Human Resources Department.

Dissemination

This policy will be located on the Human Resources website.

Responsible Parties

Role	Individual/Group	Contact Info
Comply with	All Employees	N/A
Policy Executor(s)	Human Resources	Sherry O’Brien Human Resources Coordinator 315-267-2096 obriensl@potsgdam.edu Melissa Proulx Associate Vice President 315-267-2086 proulxme@potsgdam.edu

Change History

Date	Change History
March 22, 2023	New Policy

Approved by **President's Council**: February 22, 2023