

Massachusetts College of Pharmacy and Health Sciences

Compliance Guide

Introduction

Massachusetts College of Pharmacy and Health Sciences (“MCPHS” or the “Institution”) is a premier global educational organization committed to establishing and maintaining a culture of Institutional compliance. All members of the MCPHS community are expected to adhere to standards of professional and ethical conduct.

MCPHS navigates a complex and highly-regulated operating environment, where compliance must transcend mere regulation of individual actions and be achieved within a culture of accountability. All employees have a responsibility to comply with a wide variety of complex rules that affect the Institution’s day-to-day operations, authorizations, and accreditation status. A culture of compliance furthers the Institution’s ability to deliver high quality educational programs and services to students, and carry out the purposes, mission, and values outlined in the MCPHS Strategic Plan.

Purpose of Compliance Guide

The purpose of this guide is to communicate the Institution’s commitment to compliance goals, the responsibilities and expectations of employees concerning compliance, as well as the governance structure and certain policies and procedures pertaining to compliance at MCPHS.

Compliance activities at MCPHS must be flexible and responsive to the Institution’s ever-changing legal and operating environment. This Guide is designed to supplement the Institution’s policies that detail expected behavior, objectives, and goals for specific areas of Institutional compliance.

Please carefully read this Guide and understand the concepts outlined herein. Active participation and commitment from all employees are essential for effective Institutional compliance. At MCPHS, employees are responsible for knowing and understanding all institutional, academic, and departmental policies and procedures that apply to their work, as well as the applicable federal, state, and local laws, regulations and accreditation standards that impact their scope of duties.

Overview of MCPHS Compliance

The Institution’s students, employees, contractors, volunteers, and other members of governance are responsible for complying with federal, state, and local regulatory requirements, professional and accreditation standards, and MCPHS policies and procedures.

Compliance at MCPHS is achieved through regular identification of high-risk compliance areas; education, training, and guidance provided to members of the MCPHS community including faculty, staff, students, Trustees, and other responsible constituents; and monitoring the effectiveness of compliance activity.

Compliance Goals

Compliance goals of MCPHS include:

- Establishment and dissemination of formal compliance standards, policies, and procedures to all responsible members of the MCPHS community;
- Implementation of specific policies and procedures to ensure that the Institution exercises due care not to hire, continue to employ, or contract with individuals who have a demonstrated propensity to engage in unlawful or unprofessional activity;
- Promotion of compliance awareness through ongoing communication, education, and training;
- Prevention and/or detection of non-compliance through (i) ongoing identification of high-risk activities through assessments and the implementation of appropriate internal controls and monitoring processes; and (ii) the maintenance of a well-publicized reporting mechanism by which compliance concerns or questions may be reported in good faith by MCPHS employees and others without intimidation or fear of retribution or retaliation;
- Identification and resolution of instances of non-compliance through timely investigation of possible non-compliance, including implementation of appropriate corrective action to prevent recurrence of such non-compliance in the future; and
- Consistent enforcement of compliance standards, including utilization of appropriate measures to address non-compliance.

Governance Structure

The Compliance Committee of the MCPHS Board of Trustees (the “Compliance Committee”) and the MCPHS Compliance Team (the “Compliance Team”) have been established for assisting in the oversight of Institutional compliance.

Board Compliance Committee

The Compliance Committee of the Board of Trustees is responsible for establishing governance oversight of Institutional compliance by providing guidance and support in establishing the purposes, design, and tone of compliance oversight activities.

Responsibilities of the Compliance Committee include:

- Review and understand MCPHS policies, procedures and activities that support and strengthen Institutional compliance.
- Receive reports of the Compliance Team on compliance monitoring activities.
- Report activities, findings and recommendations to the full Board of Trustees.
- Meet no less than three times annually.
- Discuss and address any immediate compliance concerns.

MCPHS Compliance Team

The Compliance Team is composed of senior leaders charged with furthering Institutional compliance by doing the following:

- Understanding the Institution's compliance requirements in order to identify and assess risks, for the purpose of prioritizing compliance initiatives;
- Reviewing and recommending changes to departmental compliance policies, procedures and controls pertaining to identified compliance risks;
- Creating a safe environment free from retaliation to inquiries about possible compliance concerns and related reports concerning compliance risk;
- Evaluating the effectiveness of Institutional compliance, including systems for communicating, evaluating, and responding to complaints and other compliance matters;
- Helping identify potential instances of non-compliance, waste, fraud, and/or abuse;
- Assisting in resolving identified compliance issues and implementing corrective action plans;
- Ongoing monitoring of compliance policies and procedures and, if required, providing support regarding appropriate measures to address repeated instances of non-compliance;
- Encouraging a culture of compliance throughout the Institution; and
- Reporting periodically to the Board Compliance Committee regarding Institutional compliance.

The Compliance Team includes the following positions or their designee:

- President (Co-Chair)
- Vice President for Academic Affairs and Provost (Co-Chair)
- Chief Financial Officer

Responsibility for Monitoring Laws, Setting Institutional Policy, and Communicating Procedures and Policies to Faculty and Staff

In order to create a culture supportive of compliance, all MCPHS responsible officials, department heads and supervisors shall be responsible for:

- Participating in the identification of risks in their department;
- Developing and maintaining departmental compliance policies, procedures and controls that address identified risks;
- Identifying and providing training to departmental employees relevant to general compliance as well as training concerning specific risk areas;
- Ensuring all employees within the department complete required training;
- Creating a safe environment for reports of possible compliance concerns to a department head or manager without fear of retaliation;
- Taking all measures reasonably necessary for compliance with the Institution's policies and procedures, as well as applicable laws and regulations, by:
 - Monitoring employee adherence to established policies and procedures;
 - Reporting and encouraging departmental staff to report potential lapses to the Compliance Team or the Compliance Hotline;
 - Reviewing suspected instances of non-compliance in conjunction with University Counsel and the Compliance Team;
 - Coordinating with Human Resources regarding any appropriate disciplinary action necessary; and
 - Implementing corrective action plans.

Compliance Awareness, Education and Training

A culture of compliance can only be built and maintained in an organization through clear and ongoing communication, education, and training. Proper and continuing training and education of employees is a significant element of MCPHS compliance.

Each department head should regularly evaluate the training and education programs offered to the employees of their department to determine, and if necessary, improve, the value, effectiveness, and appropriateness of any such program. All employees need not have the identical amount of training and education, nor should the focus of training and educational efforts be the same for all members. The actual amount of training should reflect necessity, an analysis of risk areas, and specific areas of concern identified by MCPHS or a regulatory oversight body, the Institution's compliance experience, and the results of periodic monitoring. Each department head should also consult with the Compliance Team to identify additional or replacement training and education necessary or advisable for any employees of their respective department.

Adherence to and promotion of this Compliance Guide shall be a factor in evaluating employee performance (including supervisory, managerial, and administrative personnel). Employees should be trained and, as necessary, re-trained in the specific laws and regulations that relate to their particular job functions.

Reporting of Compliance Concerns

MCPHS expects all students and employees to conduct their activities in compliance with applicable policies, procedures, and laws. Members of the MCPHS community have an affirmative duty to disclose and seek guidance if they have compliance concerns or believe that another member of the MCPHS community or other person associated with or doing business with MCPHS is engaging in illegal, unethical or other inappropriate conduct. When possible, employees should first contact their supervisor or unit manager.

Supervisors and unit managers need to know about issues that arise in the area under their management, and they are often in the best position to answer questions and take action.

If an employee does not feel comfortable raising a concern with their supervisor or manager (or if the concern relates to the supervisor or manager, or if the supervisor or manager has been previously informed but the concern has not been remedied), there are several additional ways to report a concern:

- Report a concern to a member of the Compliance Team.
- Report the issue through the Compliance Hotline as outlined below.

Compliance Hotline

The Compliance Hotline is a toll-free, 24-hours-a-day, 7 days-a-week resource for reporting compliance concerns. Once a compliance concern is raised via the Hotline, a detailed report is forwarded to the Office of Legal Affairs and, where necessary and appropriate, shared with the Compliance Team. The Compliance Hotline is staffed and managed by an external company, Lighthouse Services, Inc., that is not affiliated with MCPHS and provides this service under contract. No call tracing or recording devices are ever used on phone calls, and for anonymous reports, all complainant contact information is removed before being transmitted to MCPHS. Information about the Hotline can be found at: <https://www.mcphs.edu/about-mcphs/legal>.

To use the Hotline, you may submit a report using one of the methods set forth below:

Online: <https://www.mcphs.edu/about-mcphs/legal>.

Telephone: (877) 472-2110

Email: reports@lighthouse-services.com (indicate the report concerns MCPHS)

If you are faced with an emergency or are concerned for the immediate safety of yourself or others, dial 911.

MCPHS prohibits retaliation against individuals who report compliance issues in good faith.

Response and Corrective Action

When an instance of non-compliance has been confirmed by the Compliance Team through periodic monitoring, a report of non-compliance, or through an investigation, the Compliance Team, in coordination with appropriate responsible MCPHS officials, will facilitate the implementation of a corrective action plan with the affected departments, faculty, and/or staff. The corrective action plan may include any or all of the following elements: identification of specific areas requiring compliance correction; additional training; change in policies and procedures; further review; and disciplinary action.

Disciplinary action may be imposed as part of a corrective action plan for any employee or member of the MCPHS community. Disciplinary actions may include, but are not limited to, spoken and written counseling, spoken or written warnings, demotion, suspension, and any other action deemed appropriate to the particular situation, up to and including termination of employment. The Institution, in its sole discretion, would determine the appropriate disciplinary or corrective action based on an evaluation of the specific circumstances surrounding the non-compliance. Nothing in this Compliance Guide gives an employee the right to receive any particular type of discipline nor limits the Institution's right to terminate the employment relationship at any time, with or without cause or notice.

Retaliation

MCPHS encourages all employees and students to make good-faith disclosures of Institution-related misconduct. The Institution will not tolerate retaliation or threat of retaliation of any kind against those who make disclosures of actual or perceived misconduct. Acts or threats of retaliation in response to such disclosures may subject the person threatening or retaliating to disciplinary action, up to and including termination of employment.

Conclusion

Understanding and complying with this Guide is of the utmost importance to ensure that MCPHS operates effectively as an organization and avoids significant legal issues. If you have any questions about the application of this Guide, please contact the MCPHS Office of Legal Affairs at (508) 373-5810 to be connected with a member of the MCPHS Compliance Team.

Last updated: January 2026