



Policy on Reporting Suspected Misconduct (Whistleblower Policy)

American University expects its employees to perform their duties in accordance with applicable laws and regulations, University policy and procedures and high ethical standards. The University is committed to compliance with all applicable laws and regulations and to promulgate and administer university policies and procedures that faithfully apply such laws and regulations. A culture of compliance strengthens and promotes ethical practices and respectful treatment of all members of the University community and those who conduct business with the University.

1. Purpose.

The purpose of this Policy is to encourage and enable good-faith reports by University employees and others of observed or suspected misconduct or noncompliance with law or with University policies and procedures.

2. Scope.

This Policy is intended to encourage and enable employees and others who have good-faith serious concerns about misconduct, including violations of law, regulations or University policies and procedures or other conduct (“Misconduct”) to raise them with the University before seeking external resolution. This Policy is not intended to supplant, but rather to complement and supplement, existing University policies. It thus does not affect any rights, responsibilities or procedures set forth in other University policies addressing misconduct. For example, complaints or grievances such as those regarding discrimination or harassment, other personnel and employment matters, academic and disciplinary matters, academic freedom, research misconduct and other matters as to which there are specific University policies, should ordinarily be made and addressed in accordance with the University policies applicable to such matters and applicable law.

3. Reporting Responsibility.

Each member of the University community shares responsibility for stewardship of university resources and compliance with laws and policies. Therefore, University faculty, staff and students are encouraged to report, in accordance with this Policy, any Misconduct by University employees, or actions of

other parties that may result in financial loss or other harm to American University, of which they may become aware. For purposes of this Policy, a Reporting Person is any employee or student who makes a report under this Policy.

4. Guidance on Reporting.

An employee who has a question about the propriety of any practice under University policies or procedures should ordinarily seek guidance from his or her supervisor or a University official with compliance oversight responsibility for the particular policy or procedure. An employee also may seek guidance from the Office of Vice President for Finance and Treasurer.

5. Confidentiality.

A Reporting Person may request that a report made under this Policy be handled as confidentially as possible under the circumstances. Although the University will endeavor to handle all such reports with discretion and due regard for privacy, other obligations and considerations may preclude the University from maintaining confidentiality in all circumstances.

6. Anonymous Reports.

A Reporting Person may make an anonymous report. However, it should be understood that any investigation may be hampered or be impracticable if the Reporting Person cannot be identified and questioned about the allegations and related facts.

7. Persons to Whom Reports May Be Made.

A Reporting Person ordinarily should make the report to his or her immediate supervisor. If the Reporting Person believes it inappropriate to report to an immediate supervisor, the Reporting Person should raise the issue with another person with supervisory authority, such as his or her manager, department chair, dean, director, or the University office or official responsible for overseeing compliance with the policy or procedure at issue. If a Reporting Person believes further reporting is appropriate, a report under this Policy may be made to the following offices.

Reports about a staff member may be filed with: Employee Relations, Human Resources Office, 4400 Massachusetts Avenue, N.W., Washington, D.C. 20016, employeerelations@american.edu, or (202) 885-2607.

Reports about a faculty member may be filed with: Dean of Academic Affairs, Office of the Provost, 4400 Massachusetts Avenue, N.W., Washington, D.C. 20016, academicaffairs@american.edu, or (202) 885-2125.

Reports about a student may be filed with: Dean of Students, Office of Campus Life, 4400 Massachusetts Avenue, N.W., Washington, D.C. 20016, dos@american.edu, or (202) 885-3300.

Reports involving the President, a Vice President or a trustee of the University, or any report concerning accounting practices, finances, internal controls, inappropriately managed conflicts of interest, and/or auditing may be submitted to the Chair of the Audit Committee of the American University Board of Trustees, by submitting the report, in an envelope addressed to the Chair of the Audit Committee, to the office of the Secretary of the University, 4400 Massachusetts Avenue, N.W., Washington DC 20016. Reports submitted in this manner will be delivered to the Chair of the Audit Committee for evaluation. The Audit Committee of the Board of Trustees shall address all reported concerns or complaints. The Audit Committee will exercise discretion in determining whether to conduct further review, initiate an investigation or refer the matter to a University office the Committee deems appropriate to handle it, or what other steps if any are warranted.

8. No Retaliation.

No individual who in good faith reports a violation or suspected violation shall thereby suffer harassment, retaliation or adverse employment and/or academic or educational consequence. An employee who retaliates against someone who has made a report in good faith under this Policy is subject to disciplinary action, up to and including dismissal from the University. Individuals who believe they have suffered retaliation may report it to one of the reporting venues identified above.

Reports made in bad faith or with knowledge of their falsity may subject individuals to disciplinary or other appropriate action. Making a report under this Policy shall not insulate an individual from personnel or other actions that are warranted based on performance or other factors and are not caused by the making of a complaint under this Policy.

9. Document Retention.

The Office of Vice President for Finance and Treasurer will document the processing and, as appropriate, resolution of reports made under this Policy, and shall retain such documents in a secure location.

10. Interpretation.

The Office of Vice President for Finance and Treasurer is responsible for implementing and interpreting this policy.

Adopted June 9, 2006