1. Purpose

The West Texas A&M University Environmental Health and Safety office recognizes that, within a complex, expanding, and ever-evolving panoply of federal and state rules and university standard operating procedures, compliance can be difficult or confusing.

The EHS Compliance Helpline had been developed to provide:

Assistance and support for WTAMU employees who seek information on research compliance.
An avenue for WTAMU employees to voice concerns related to potential noncompliance with EHS standard operating procedures and external agency regulations.

The WTAMU EHS Compliance Hotline is confidential and anonymous (if desired).

Resolution will be made by knowledgeable individuals. The program is managed by the Supervisor of Environmental Health and Safety, under the direction of Dr. Angela Spaulding, WTAMU Vice President of Research and Compliance.
West Texas A&M University is committed to complying with all applicable laws and regulations, accounting standards, accounting controls, and audit practices. Any person may submit a good-faith complaint regarding compliance matters to the management of the University without dismissal or retaliation of any kind.

2. Procedure

You may submit a Compliance Helpline request in several ways.

A. Web submission (anonymous, if desired): EHS Research Compliance Helpline Request Form
B. Email submission: EHS@wtamu.edu
C. Telephone or fax contact

   a. April Swindell, Supervisor, Environmental Health and Safety
      WTAMU Box 60217, Canyon, TX 79016
      806-651-2270
      aswindell@wtamu.edu

   b. Dr. Angela Spaulding, Vice President of Research and Compliance; Dean of the Graduate School
      WTAMU Box 60215, Canyon, TX 79016
      806-651-2732
      aspaulding@wtamu.edu

3. Treatment of Complaints

A. Upon receipt of a complaint, the VPRC will:
   1. Determine whether the complaint pertains to compliance matters.
   2. Acknowledge receipt of the complaint to the sender, when the sender’s contact information is provided.

B. Complaints relating to compliance matters will be reviewed by the VPRC. The VPRC will use his or her “best efforts” to investigate every complaint. The resources expended will depend upon:
   1. The nature and severity of the allegation
   2. The sufficiency and apparent validity of the information provided.

C. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken as warranted by the University. The VPRC shall provide compliance oversight of any corrective action.

D. The University will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding compliance matters.

4. Reporting and Retention of Records of Complaints and Investigations

The VPRC will maintain a log of all complaints, tracking their receipt, investigation, and resolution and shall prepare a periodic summary report thereof for the Environmental Health and Safety Supervisor, the Chief Research Officer and the University Provost. Copies of complaints and such log will be maintained in accordance with the University’s document retention policy.

No official state records may be destroyed without permission from the Texas State Library as outlined in Texas Government Code, Section 441.187 and 13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7. The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A & M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A & M University Environmental Health and Safety will follow Texas A & M University Records Retention Schedule as stated in the Standard Operating Procedure 61.99.01.W0.01 Records Management.
official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

5. **Training**

West Texas A & M University Environmental Health and Safety will follow the Texas A & M University System Policy 33.05.02 Required Employee Training. Staff and faculty whose required training is delinquent more than 90 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 90 days will need to be terminated by their manager through Student Employment.

6. **Definitions**

“Compliance complaint matters” means complaints regarding accounting, internal accounting controls, auditing matters, ethics, laws, regulations, System policies, and best business practices applicable to the System. Examples of compliance matters include, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the System;
- fraud or deliberate error in the recording and maintaining of financial records of the System;
- deficiencies in, or noncompliance with, the System’s internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the System;
- deviation from full and fair reporting of the System’s financial condition;
- failure to comply with applicable federal, state and local regulations, System policies, or best business practices; or
- conflicts of interest and other ethical breaches by System employees.

“System Compliance Committee” consists of the System Compliance Officer, the Research Compliance Officers appointed for each System member, and other persons appointed by the SCO.

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**Related Statutes, Policies, or Requirements**

Supplements System Policy 15.03.

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**Contact Office**

WTAMU Environmental Health and Safety  
(806) 651-2270
Appendix A

WTAMU EHS
Compliance Helpline Form

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      806-651-2732 aspaulding@wtamu.edu

Submission of the WTAMU EHS Compliance Helpline Form does not require completing contact information. Such submissions may be made confidentially and/or anonymously; however, the more information provided, the more expeditiously and efficiently the report can be investigated. If you do not submit contact information, please provide specific detail.

* Required only if feedback is requested
Name* (Last, First) ________________
Email* ____________________________ EHS Compliance Helpline Form
Phone* __________________________
Date ______________________________
Subject __________________________

_____ You may contact me for further information; however, I request my submission remain confidential.
_____ You may contact me for further information; my submission is not confidential.
Comment, Question or Concern