

Staking Out Independence in a Multi-Stakeholder World:

Conducting sensitive
investigations at
universities

1. Leadership/Ethical Culture
2. Identify Requirements/Assess Risk
3. Compliance Organization
4. Standards, Policies, & Procedures
5. Communicate, Promote, & Train
6. Monitor, Audit, and Report
7. **Investigate and Report**
8. Enforce and Remediate
9. Evaluate/Continuously Improve

Laws & Regulations

from happening, to **find** them when they do, and to **fix** them once they are found. **Prevent. Find. Fix.**

- Gerry Zack, CEO of HCCA/SCCE

Prevent

Find & Fix

Implement

Identify Requirements/ Assess Risk

Establish Compliance Organization

Standards, Policies, and Procedures

Communicate, Promote, and Train

Monitor, Audit, and Report

Investigate and Report

Enforce and Remediate

Evaluate and Continuously Improve

Leadership and Ethical Culture

- Gerry Zack, CEO of HCCA/SCCE ¹

¹ Quoted in “Embracing simplicity in compliance with prevent, find, and fix,” *CEP Magazine*, October 2024, emphasis added.

From the University of Missouri System office of Ethics,
Compliance, and Audit Services (ECAS);
<https://www.umsystem.edu/ums/ecas/compliance>

Case Study: Sunnyvale University

- On May 30, 2025, a note is sent to the hotline of Sunnyvale University from an anonymous email address.

To whom it may concern:

I am writing with some concerns about the Chair of the Engineering Department. If these issues are not addressed within one month, I will take them to the press.

As we all know, the Chair of the Engineering Department has been fundraising to build a new 3D printing lab for undergraduate students on campus. This is great. What is less great is that the Chair agreed to give one of the lab's donors (who pledged \$500,000) private access to the lab on every Monday and Wednesday afternoon.

The Chair has been using the department's discretionary fund to rent a summer estate at Sunnyvale Lake and host catered gatherings for his friends and family. I know because I see the Chair's posts on Instagram.

And lastly, if that wasn't enough, I ran the Chair's recently published paper on robotics engineering through one of those software programs you all use to check if we're cheating and found that the Chair is claiming credit for results in a paper published by a German university six months ago. I have the German article, so email me back at sunnyvaleconcernedstudent@gmail.com and I'll send it to you.

Case Study: Sunnyvale University

- The university is weighing whether to retain counsel to investigate the allegations contained in the hotline report.
- Additional considerations:
 - A Sunnyvale University trustee is close friends with the Chair of the Engineering Department
 - Sunnyvale University requires the Ethics and Compliance Office to notify the Board of allegations against department chairs
 - Only two months before the report was submitted, a local news organization published a video of a disturbing hazing incident at Sunnyvale's on-campus engineering fraternity.
 - The video resulted in sharp criticism from many within Sunnyvale's community, including its alumni.
 - As a result, the school is navigating several lawsuits, and the university is concerned about the risk of reputational harm.