



## WINTER 2026 COURSE SYLLABUS

Course Number: 124-R01

Course Title: Introduction to Business Ethics and Compliance

Credit Hours: 1

Grading Mode: CR/NC

Meeting Time(s):

The course will meet on four occasions via Zoom between 5 and 12 January 2026 inclusive.

On 5 and 6 January from 6:30pm-9:30pm;

On 7 and 9 January 6:30pm-8:30pm, and;

On 12 January 4pm-7pm EST.

Meeting Mode: Online

Exam Time(s): N/A

Exam Mode: Paper

Prerequisite(s): N/A

Corequisite(s): N/A

Instructor(s):

Mary Shirley

Lisa Estrada

Contact Information and Office Hours:

[mshirle2@GMU.EDU](mailto:mshirle2@GMU.EDU)

[lestrad4@GMU.EDU](mailto:lestrad4@GMU.EDU)

Reading(s) & Supplement(s):

The course materials will be available to students in a course packet consisting of publicly available materials which do not require the students to incur cost to review.



### Course Overview:

This course provides an in-depth examination of the role and value of ethics and compliance functions within organizations. The course will focus on the pillars of a compliance program and analyze how these elements fall within the context of international and domestic legislation. Special emphasis will be placed on key statutes such as the US Anti-Kickback Statute, False Claims Act, Stark Law, The Foreign Corrupt Practices Act and the UK Bribery Act, providing students with an understanding of the regulatory landscape and key compliance risk areas for companies operating both domestically and internationally.

### Course Learning Outcomes:

A student who completes this course will demonstrate:

- an understanding of key elements of the legal regimes and government agency expectations that are pertinent to modern day Ethics and Compliance practitioners
- an understanding of the differences and interrelationships between Compliance and Legal
- an understanding of internal controls frameworks
- knowledge of the essential elements of an effective Compliance program

### Grading Policies:

A grade of 80% or more will be required to pass this class. Students will be graded on two major components; submission of a “Compliance Hot Topic” paper of publishable quality (600-800 words, not including footnotes) and class participation in equal parts.

- **WRITING ASSIGNMENTS:** Students will complete a final paper that will be due by midnight PST on 18 January 2026. In the paper, students will identify and analyze a discrete issue, incorporating a clear thesis. The writing assignment will count for 50% of the course grade.
- **CLASS PARTICIPATION:** In this course, students should come to class prepared to participate in class discussion, having critically analyzed the readings. Class participation will count for 50% of the final grade.

### Classroom Policies:

**Attendance:** Per AR 3-1.4, “maintenance of matriculation requires regular class preparation, participation and attendance, registration in the course of study required for the student’s program (full-time or part-time), successive registration for each fall and



spring term of each academic year until study is completed, and compliance with all other relevant requirements.”

Regular attendance by way of being visible in class on camera is expected, and participation is required to achieve a passing grade.

**Absences:** Per AR 4-1.1, “if a student is absent for any reason for more than 20 percent of the sessions of a course, the student is not eligible for credit in that course. A student who is not present for at least 75 percent of a session of the course is absent from that session.”

#### **Participation & Preparation:**

Class attendance and interactivity will make up half of the grade. Class attendance is expected and required, with persistent unexcused absences subjecting students to a downward grade adjustment. In addition, each student may be requested to participate in helping lead a portion of a class. Guest speakers may also be invited to participate in the class. Attendance with cameras on for the duration of the classes is expected.

- Students are expected to complete pre-read assignments and be prepared to discuss.
- Each student (either individually or as part of a group) will be required to lead a compliance case student class discussion).
- Academic Integrity: All work submitted must be your own. Plagiarism or any form of academic dishonesty, including use of artificial intelligence will not be tolerated.

#### **Professional Conduct:**

Our goal is to develop a learning community that is inclusive and respectful, and we ask you to commit to that same goal. A dedication to inclusiveness requires respecting what others say, their right to say it, and the thoughtful consideration of others’ communication. Both speaking up and listening are valuable tools for furthering thoughtful, enlightening dialogue.

#### **Use of Technology & AI:**

**Strict Use Policy:** The use of generative AI tools is not permitted for any coursework in this course. Unauthorized use will be treated as a violation of academic standards.



## Course Schedule & Assignments

DATE	SUBJECT	ASSIGNMENT
Class 1 5 Jan 2026 6:30pm- 9:30pm ET	<b>The Role of an Ethics and Compliance Function</b> <ul style="list-style-type: none"> <li>• Analyze the role of an Ethics and Compliance Function</li> <li>• Understand What's Involved in Building an Ethical and Compliant Culture</li> <li>• Evaluate the impact of ethical and compliance failures on organizations</li> <li>• Discuss Wells Fargo Cross-Selling Scandal Case Study               <ul style="list-style-type: none"> <li>○</li> </ul> </li> </ul>	<b>Required Pre-Read:</b> <ol style="list-style-type: none"> <li>1. <a href="#">The Starbucks Standards of Business Conduct</a></li> <li>2. <a href="#">Complex Compliance Investigations</a>, Veronica Root Martinez, Columbia Law Review, March 2020.</li> </ol> <b>Additional Suggested Reading</b> <ol style="list-style-type: none"> <li>1. <a href="#">A Better Approach to Avoiding Misconduct</a>, Harvard Business Review.</li> <li>2. <a href="#">Department of Justice Albermarle FCPA Settlement</a>.</li> </ol>
Class 2 6 January 2026 6:30pm- 9:30pm ET	<b>Compliance Program Pillars</b> <ul style="list-style-type: none"> <li>• Examine the fundamental components of an effective compliance program.</li> </ul>	<b>Required Pre-Read:</b> <ol style="list-style-type: none"> <li>1. U.S. Department of Justice, Criminal Division, Evaluation of Corporate Compliance Programs, <a href="#">DOJ ECCP Guidance Updated September 2024</a></li> </ol> <b>Additional Suggested Reading</b> <ul style="list-style-type: none"> <li>• <a href="#">Practical Guidance for Health Care Boards on Compliance Oversight</a></li> <li>• The Compliance Handbook: A Guide to Operationalizing Your Compliance Program 6<sup>th</sup> edition, Thomas Fox, Lexis Nexis, 2025</li> </ul>



DATE	SUBJECT	ASSIGNMENT
Class 3 7 January 2026 6:30pm- 8:30pm ET	<b>Key Compliance and Ethics Risks</b> <ul style="list-style-type: none"> <li>• Introduction to Key International and Domestic Laws <ul style="list-style-type: none"> <li>- Anti-Bribery &amp; Corruption Laws (UK Bribery Act, Foreign Corrupt Practices Act)</li> <li>- Antitrust Laws</li> <li>- Data Privacy</li> <li>- Conflict of Interest</li> </ul> </li> <li>• Understand the challenges of operating within a global regulatory environment</li> </ul>	<p><b>Required Pre-Reading:</b></p> <ol style="list-style-type: none"> <li>1. UK Ministry of Justice Guidance, UK Bribery Act, <a href="#">Bribery Act 2010 guidance - GOV.UK (www.gov.uk)</a></li> <li>2. <a href="#">Department of Justice, Criminal Division, FCPA Resource Guide</a>.</li> </ol> <p><b>Additional Suggested Reading</b></p> <ol style="list-style-type: none"> <li>1. <a href="#">Understanding Key Aspects of Data Compliance</a>, Tim Freestone, Security and Compliance Blog.</li> <li>2. US Department of Justice <a href="#">Evaluation of Corporate Compliance Programs in Criminal Antitrust Investigations</a>, July 2019.</li> </ol>
Class 4 9 January 2026 6:30- 8:30pm ET	<b>Focus on Preventing and Detecting Compliance Failures</b> <ul style="list-style-type: none"> <li>• Proactive vs Reactive Compliance Programs</li> <li>• Control Framework and Lines of Defense</li> <li>• Outreach, Advocacy and Awareness</li> <li>• Training and Education</li> <li>• Empowered and Independent Function, Buy-In and Seat at the Table</li> <li>• Monitoring, Review and Continuous Improvement</li> <li>• Data Analytics and Behavioral Science as Tools</li> <li>• Tactics and techniques for conducting investigations</li> </ul>	<p><b>Required Pre-Reading:</b></p> <ol style="list-style-type: none"> <li>1. <a href="#">Leveraging Coso Across the Three Lines of Defense</a> (Pages 1-9 only)</li> </ol> <p><b>Additional Suggested Reading</b></p> <ol style="list-style-type: none"> <li>1. 65 Hacks &amp; Cheat Codes to Level Up Your Ethics and Compliance Program, Mary Shirley, CCI Press, 2023</li> <li>2. Humanizing Rules: Bringing Behavioural Science to Ethics and Compliance Christian Hunt, Wiley, 2023</li> </ol>



DATE	SUBJECT	ASSIGNMENT
Class 5 12 January 2026 4- 7pm ET	<b>Introduction to Healthcare Compliance</b> <ul style="list-style-type: none"> <li>Understand the structure and purpose of healthcare compliance programs</li> <li>Identify key healthcare-specific risks and regulatory frameworks in provider, life sciences, and insurance settings</li> <li>Analyze and respond to health care compliance challenges through tabletop exercises</li> </ul>	<p><i>Required Pre-Reading</i></p> <ul style="list-style-type: none"> <li><a href="#">OIG General Compliance Program Guidance</a> (2023)</li> <li><a href="#">The Need for Heightened Compliance in the Life Sciences Industry</a></li> <li><a href="#">Memorial Health Services: Medicare Parts C and D Compliance Program Overview</a></li> </ul> <p><i>Additional Suggested Reading</i></p> <ul style="list-style-type: none"> <li><a href="#">Community Health Settles 31.5 Million Claim With DOJ Over Kickback Allegations</a></li> </ul>



## Student Resources

[Antonin Scalia Law School Academic Regulations](#)

[GMU Common Course Policies Addendum](#)

[Mason Square Services](#)

[Mason Square Police](#)

Van Metre Hall, Room 110

Emergency - Dial 911

Escort Services - 703-993-8070

Dispatch – 703-993-2810

[Student Support and Advocacy Center \(SSAC\)](#)

Mason Square Sexual Assault Services:

Van Metre Hall, Room 222D

703-993-8186

Notice of Mandatory Reporting of Sexual Assault, Sexual Harassment, Interpersonal Violence, and Stalking:

As a faculty member, I am designated as a “Non-Confidential Employee,” and must report all disclosures of sexual assault, sexual harassment, interpersonal violence, and stalking to Mason’s Title IX Coordinator per University Policy 1202. If a student wishes to speak with someone confidentially, please contact one of Mason’s confidential resources, such as Student Support and Advocacy Center (SSAC) at 703-380-1434 or Counseling and Psychological Services (CAPS) at 703-993-2380. Students may also seek assistance or support measures from Mason’s Title IX Coordinator by calling 703-993-8730, or emailing [titleix@gmu.edu](mailto:titleix@gmu.edu).

[Mason Square Clinic](#)

Van Metre Hall, Room B102

703-991-2831

[Counseling and Psychological Services](#)

[Student Health Services](#)

[Student Disability Services](#)

[Student Conduct](#)

[University Life](#)