

A recent survey of academic institutions reveals remarkable consensus about the compliance risks that they face and the essential elements of an effective compliance program, but when it comes to actual compliance programming post-secondary institutions differ markedly. At least two-thirds of all academic institutions report that they still have no formal compliance function planned or chief compliance officer, and the remainder report predominately decentralized structures. To address the continuing compliance deficit and accommodate historic institutional norms related to independent inquiry and scholarship, this Article suggests that post-secondary institutions incorporate the familiar concepts of federalism and separation of powers into their compliance programs, where academic departments become the federal elements of academic governance and the administration, faculty, and students become the branches of the Academy's compliance structure.