

University of Richmond Compliance Matrix
Compliance Offices and Officers

Compliance Areas	Cognizant Policy Office(s)	Cognizant Policy Officer(s)	Office(s) with Day-to-Day Responsibility	Individual(s) with Operational Responsibility	Compliance Partner(s)	Representative Issues	Applicable Laws
Advancement & Charitable Giving	VP for Advancement	Tom Gutenberger	Advancement Services; Development; Foundation, Corporate & Government Relations; Gift Planning; Annual Giving; Donor Relations	Heather Krajewski; Michelle Wamsley; Aaron McClung; Shawn Morrison; Sarah Melvin; Robb Moore	Shannon Sinclair, VP & General Counsel; Laurie Melville, Controller; Cindy Deffenbaugh, Financial Aid; Du'Neika Easley, Internal Audit	Compliance with donor restrictions; gift receipts; charitable substantiation requirement; quid pro quo transactions; donor stewardship	UPMIFA; IRC; substantiation and disclosure rules; CAN-SPAM; charitable solicitation and registration laws in various states
Alcohol Use on Campus	VP for Student Development	Steve Bisese	Student Involvement; Dining Services; Conferences and Special Events	Alison Keller; Dee Hardy	Dave McCoy, AVP Campus Safety/Police Chief	Use of alcohol on University property and events held on campus; ABC temporary licenses	Virginia ABC laws, Drug Free Schools and Communities Act;
Americans with Disabilities Act (ADA) / Rehabilitation Act -- Employees	VP for Business & Finance	David Hale	Office of Human Resource Services	Carl Sorensen	Andrew McBride, Facilities; Jacque Fetrow, Provost (faculty matters)	Employee, student and visitor access to campus facilities and reasonable accommodations	ADA; Section 504 of the Rehabilitation Act
Americans with Disabilities Act (ADA) / Rehabilitation Act -- Facilities	VP for Business & Finance	David Hale	Facilities	Andrew McBride		Employee, student and visitor access to campus facilities	ADA; Section 504 of the Rehabilitation Act
Americans with Disabilities Act (ADA) / Rehabilitation Act -- Students	VP for Student Development	Steve Bisese	Student Health Center; VP for Student Development	Alene Waller, SHC; Tina Cade, Student Development; Mary Churchill, CAPS	Andrew McBride, Facilities	Employee, student and visitor access to campus facilities	ADA; Section 504 of the Rehabilitation Act
Athletics	Athletic Director	Keith Gill	Athletics	Monica Mims, Assistant Athletic Director (NCAA); LaRee Sugg, Associate Athletic Director (Title IX)	Shannon Sinclair, VP & General Counsel; Cindy Deffenbaugh, Financial Aid; Gil Villanueva, Admissions; Du'Neika Easley, Internal Audit	Improper giving of gifts; recruiting misconduct; financial aid misconduct; substance abuse; NCAA rules compliance	Equity in Athletics Disclosure Act; NCAA constitution and bylaws; conference rules; Title IX
Campus Security - Crime and Fire Statistics and Reporting	VP for Business & Finance	David Hale	AVP - Public Safety/Police Chief	Dave McCoy	University Communications	Clery Act reporting (reports and timely warnings); emergency planning; law enforcement records; FERPA; Campus Security Authority training	Clery Act; HEOA; Campus Sex Crimes Prevention Act; Campus Sexual Assault Victim Bill of Rights
Conduct of Research	Office of the Provost	Jacque Fetrow	Office of the Provost	Kirk Jonas, Chair - IRB; Peter Smallwood, Chair - IACUC	School Deans	Human subjects; animal use and care; IRB; informed consent; responsible conduct of research	IRB; Common Rule; National Cooperative Research Act; National Science Foundation Act; Public Health Service Act
Conflicts of Interest: Board of Trustees & Senior Management	Office of the President	Ronald A. Crutcher	Office of the President	Ann Lloyd Breeden, VP & Secretary to the Board of Trustees	Shannon Sinclair, VP & General Counsel	Improper influence over financial, research or other decisions for financial, reputational or personal gain; self-dealing; nepotism	IRC private inurement rules; IRC private benefit rules; IRC disqualified persons
Conflicts of Interest: Staff	VP for Business & Finance	David Hale	Office of Human Resource Services	Carl Sorensen	Shannon Sinclair, VP & General Counsel; Michelle Wamsley, Office of Corporate, Foundation & Government Relations	Improper influence over financial, research or other decisions for financial, reputational or personal gain; self-dealing; nepotism	NSF, PHS, FDA regulations; IRC excess benefit transactions; IRC private inurement rules; IRC private benefit rules

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Conflicts of Interest: Faculty	Office of the Provost	Jacque Fetrow	Office of the Provost	Laz Lima	Shannon Sinclair, VP & General Counsel; Michelle Wamsley, Office of Corporate, Foundation & Government Relations	Improper influence over financial, research or other decisions for financial, reputational or personal gain; self-dealing; nepotism	NSF, PHS, FDA regulations; IRC excess benefit transactions; IRC private inurement rules; IRC private benefit rules
Contracts & Procurement	VP for Business & Finance; VP & General Counsel	David Hale; Shannon Sinclair	Office of Procurement Services	Jean Hines	Abby Houser, Athletics; Dee Hardy, Campus Services; Troy Boroughs, Information Services	Conflicts of interest; contract administration; compliance with contractual provisions	Anti-Kickback Act of 1986; Byrd Amendment; Contract Disputes Act; Copeland Anti-Kickback Act; E-Sign Act; Trading with the Enemy Act; Davis-Bacon Act
Dining & Catering Services	VP for Business & Finance	David Hale	Office of Campus Services	Dee Hardy	Keesha Trim, Safety Services and Risk Management	Food acquisition, handling and storage; food service sanitation; public health inspections; oversight of non-UR catering on campus; maintenance of business licenses for general location and retail operations; maintenance of required "candle" permits	FDA regulations; Virginia public health laws and regulations; ABC laws; local regulations
Emergency Management	VP for Business & Finance	David Hale	Office of Public Safety	Brittany Schaal, Emergency Management Coordinator	Shannon Sinclair, VP & General Counsel; Dave McCoy, AVP Campus Safety/Police Chief; Doug West, AVP Telecom, Media, and User Services	Relationships with local agencies/authorities; public health issues; communications; emergency plan development and maintenance; establish EOC if required	HEOA; Virginia statutes
Endowment Management -- UPMIFA	VP for Business & Finance	David Hale	Spider Management Company	Steve Kneeley; Rob Blandford	Laurie Melville, VAP, Controller; Shannon Sinclair, VP & General Counsel	Conflicts of interest; fiduciary responsibility; prudent investment management	IRC; UPMIFA
Environmental Health & Safety / Fire Safety	VP for Business & Finance	David Hale	Safety Services and Risk Management	Keesha Trim & Dave McCoy	Steve Bisese, VP for Student Development; School Deans	Fire, building and facilities safety/inspections; workplace safety; worker's compensation; chemicals; waste management; hazardous materials; lab safety; EPA regulations; radiation compliance	OSHA; VOSH; CERCLA; EPCRA; Hazardous Materials Transport Act; Federal Insecticide, Fungicide and Rodenticide Act; Motor Carrier Act of 1980; NRC regulations; Resource Conservation and Recovery Act; Bloodborne Pathogens Standards; HEOA

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Export Control	Office of the Provost	Jacque Fetrow	Office of Corporate, Foundation & Government Relations; Office of Human Resource Services; Office of International Education	Michelle Wamsley; Carl Sorensen; Krittika Onsanit	International Studies; School Deans	Transfers of controlled information or physical items that require export licenses from the United States to a foreign country; verbal, written, electronic, or visual disclosures of controlled information related to export controlled items to foreign nationals, including any company not incorporated in the United States; travel to sanctioned/embargoed countries for purposes of teaching or performing research.	US State Department ITAR; US Department of Commerce EAR
Family Educational Rights & Privacy Act (FERPA)	Office of the Provost	Jacque Fetrow	Office of the Registrar	Susan Breeden	Cindy Deffenbaugh, Financial Aid; Annemarie Weitzel, Bursar	Access to student education records; opportunity to seek to have the records amended; disclosure of information from the records to other parties	20 U.S.C. § 1232g; 34 CFR Part 99. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.
Financial Aid	VP for Enrollment Management	Stephanie Dupaul	Office of Financial Aid	Cindy Deffenbaugh	Annemarie Weitzel, Bursar; Du'Neika Easley, Internal Audit; Tammy Hicks, Accounting; Susan Breeden, Registrar	Aid awards and disbursements; eligibility for Title IV funds; Federal Work-Study; Drug violation penalty notices; time disbursement requirements;	Title IV; Solomon Amendment; FERPA; Circulars A-21 and A-133; donor compliance
Financial Management	VP for Business & Finance	David Hale	Office of the Controller	Laurie Melville	Paul Costello, COO, Spider Management Company; Du'Neika Easley, Internal Audit	Allowable expenses; University asset inventories; investment accounting; improper accounting; theft or fraud; misuse of institutional resources	Generally accepted accounting principles; Circular A-21; IRC; VA tax code; UPMIFA
Grants Administration -- Pre-Award	VP for Advancement	Tom Gutenberger	Office of Corporate, Foundation & Government Relations	Diana Vincelli	Michelle Wamsley, Corporate, Foundation & Government Relations	Pre-award requirements; conflict of interest; conflict of commitment; regulatory review/approval (IRB/IACUC)	Circular A-21 and A-133 standards; Byrd Amendment; OMB-110, HHS/NIH regulations; Solomon Amendment; private sponsor requirements
Grants Administration -- Post-Award	VP for Business & Finance	David Hale	Office of the Controller	Tammy Hicks	Laurie Melville, Controller	Effort reporting; post-award spending/reporting compliance	Circular A-21 and A-133 standards; Byrd Amendment; OMB-110, HHS/NIH regulations; Solomon Amendment; private sponsor requirements
Higher Education Opportunity Act Amendments -- College Costs (reporting and net price calculator)	Office of the Provost; VP for Enrollment Management	Jacque Fetrow; Stephanie Dupaul	Office of Institutional Effectiveness / Financial Aid Office	Patty Murphy / Cindy Deffenbaugh	Laurie Melville, Controller; Shannon Sinclair, VP & General Counsel; Phillip Gravely, Web Communications		20 USC 1015a

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Higher Education Opportunity Act Amendments -- Disclosures to Students and Prospective Students	Office of the Provost; VP for Enrollment Management	Jacque Fetrow; Stephanie Dupaul	Registrar's Office	Susan Breeden	Patty Murphy, OIE; Cindy Deffenbaugh, Director Financial Aid; Laurie Melville, Controller, Linda Fairtile, Librarian; Gil Villanueva, Admissions; TBD, VP for Communications	Annual notices to students regarding University policies and procedures as required by HEOA	20 USC Section 1092(a) Information Dissemination Activities; Regulations 34 CFR Sections 668.41(d), 668.42, 668.43, 668.45
Higher Education Opportunity Act Amendments -- Drug and Alcohol Abuse Prevention	VP for Student Development	Steve Bisese	Associate Dean Richmond College/Coordinator Substance Abuse Prevention	Dan Fabian	Lynne Deane, Director SHC; Peter LeViness, Director CAPS	Required substance abused education and policies	20 USC 1011i
Human Resources -- Employee Benefits	VP for Business & Finance	David Hale	Office of Human Resource Services	Laura Dietrick	Carl Sorensen, Human Resource Services; Shannon Sinclair, VP & General Counsel; Laurie Melville, Controller	Employee benefits; retirement; misrepresentation of conditions or eligibility for tuition or other benefits	IRC; ERISA; COBRA; cafeteria plan regulations; HIPAA; OWBPA; USERRA
Human Resources -- Employment Issues	VP for Business & Finance	David Hale	Office of Human Resource Services	Pam Ash	Carl Sorensen, Human Resource Services; Sharon Condrey, Payroll; Lisa Williams-Nash, Student Employment	Employment; leaves; wage/hour issues; personnel policies; supervisor training; employee relations	FLSA; FMLA; DFSCA; Drug-Free Workplace Act; Employee Polygraph Protection Act; FACTA; FCRA; Immigration and Nationality Act; Labor-Management Relations Act; Labor-Management Reporting and Disclosure Act; Mutual Education and Cultural Exchange Act; NLRA; WARN Act; USERRA
Information Security	VP for Information Services	Kathy Monday	Information Services Security Administrator	Anthony Head, IS Security Administrator	Carl Sorenson, Human Resource Services; Susan Breeden, University Registrar; Cindy Deffenbaugh, Financial Aid; Shannon Sinclair, VP & General Counsel; Du'Neika Easley, Internal Audit; Linda Fairtile, Music Librarian; Troy Boroughs, AVP Systems & Networks	Responsible use of University information and computing resources; information security and privacy; e-mail and electronic communications; copyright and IP issues related to electronic and digital media; abusive incidents, harassment or irresponsible behavior related to technology	Gramm Leach Bliley Act; HIPAA; FACTA; CAN-SPAM Act; DMCA; No Electronic Theft Act; Electronic Communications Privacy Act; Communications Decency Act
Intellectual Property - Copyrights & File Sharing	Office of the Provost; VP for Information Services; VP for Development	Jacque Fetrow; Kathy Monday; Tom Gutenberger	University Communications; University Libraries	Lisa Van Riper; Linda Fairtile	Abby Houser, Athletics; Michelle Wamsley, Office of Corporate, Foundation & Government Relations	Copyrights; University marks/logos; related licensing agreements; ASCAP/BMI licenses; responding to DMCA infringement notices; Peer to Peer file sharing	Copyright Act; Digital Millennium Copyright Act; HEOA; Visual Artists Rights Act; Bayh-Dole Act; CREATE Act; Copyright Term Extension Act; Lanham Act; Trademark Revision Act; HEOA

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Intellectual Property - Invention Disclosure & Patents	Office of the Provost; VP for Development	Jacque Fetrow; Tom Gutenberger	Office of Corporate, Foundation & Government Relations	Michelle Wamsley	Shannon Sinclair, VP & General Counsel	Research-related invention disclosures, technology licensing, commercialization and patents	Bayh-Dole Act; Department of Commerce regulations; NIH and other agency specific guidelines
International /Immigration Issues	Office of the Provost; VP for Business & Finance	Jacque Fetrow; David Hale	International Education; International Tax Office	Krittika Onsanit, International Student, Scholars & Intern Services; Devon Slough, International Tax Officer	Office of Human Resource Services; Student Employment; Modlin Center; Deans	Foreign scholars and students; visiting artists and lecturers; application of tax treaties to payments to above	Immigration and Nationality Act; Mutual Education and Cultural Exchange Act; SEVIS regulations; I-9 instructions and regulations;
IPEDS Data Reporting	Office of the Provost	Jacque Fetrow	Office of Institutional Effectiveness	Patty Murphy	Susan Breeden; Stephanie Dupaul; David Hale; Cindy Deffenbaugh; Steve Bisese; Shannon Sinclair	Reporting required under applicable Department of Education regulations; HEOA Consumer information	20 USC Section 1015a
Non-Discrimination / Harassment -- Faculty and Staff	VP for Business & Finance	David Hale	Office of Human Resource Services	Carl Sorensen	Shannon Sinclair, VP & General Counsel	Gender discrimination; age discrimination; race discrimination; intimidating, hostile or offensive work environment	Age Discrimination Act; Titles VI, VII of Civil Rights Act.; Equal Pay Act; Immigration and Nationality Act; OWBPA; Pregnancy Discrimination Act, USERRA; Genetic Information Non-disclosure Act; Title IX
Non-Discrimination / Harassment -- Student	VP for Student Development	Steve Bisese	Dean, Richmond College; Dean, Westhampton College	Joe Boehman; Westhampton College Dean; Kerry Fankhauser, Dan Fabian, LaRee Sugg	Shannon Sinclair, VP & General Counsel	Gender discrimination; Title IX compliance, age discrimination; race discrimination; intimidating, hostile or offensive educational or work environment	Age Discrimination Act; Titles VI, VII of Civil Rights Act.; Equal Pay Act; Immigration and Nationality Act; OWBPA; Pregnancy Discrimination Act, USERRA; Genetic Information Non-disclosure Act; Title IX
PCI-DSS	VP for Business & Finance	David Hale	Treasury Services; Network Services; Credit Card Merchants	Credit Card Merchant Managers, various; Val Cemprola, Treasury Services; Troy Boroughs, Information Services	Louie Love, Treasury Services; Anthony Head, Security Administrator, Information Services	Credit card security	PCI-DSS Contract Standards
Privacy -- Clinical Records	VP for Student Development	Steve Bisese	Counseling and Psychological Services; Student Health Center	Peter LeViness (CAPS); Lynne Deane (SHC)	Information Services	Counseling & psychological services records; student health center records	FERPA; Gramm Leach Bliley; Virginia Health Records Privacy Act
Privacy -- Employment & Benefit Records	VP for Business & Finance	David Hale	Office of Human Resource Services	Laura Dietrick; Denise Jones	Information Services	Employee records; disciplinary actions; health insurance records; claims information	Gramm Leach Bliley; Virginia Health Records Privacy Act; HIPPA; institutional policies

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Privacy -- Financial Records	VP for Business & Finance	David Hale	Office of the Controller; Office of Treasury Services; Advancement Services	Annemarie Weitzel, Bursar; Sharon Condrey, Payroll; Jean Hines, Payments & Strategic Sourcing; Louie Love, Treasury Services; Kerri Chapman, Advancement Services	Information Services	Banking records; loan records; other financial information	Gramm Leach Bliley; Virginia Health Records Privacy Act; FTC Red Flag Regulations; PCI-DSS
Program Integrity Rules - Gainful Employment	Office of the Provost	Jacque Fetrow	Dean, School of Continuing Studies	Jamelle Wilson	TBD, Mgr. Compliance, SPCS; Patty Murphy, OIE; Cindy Deffenbaugh, Director Financial Aid; Susan Breeden, Registrar; Shannon Sinclair, VP & General Counsel	Disclosures and reporting regarding gainful employment programs; Notification of New Programs; Gainful employment metrics for continued eligibility	34 CFR 600.10; 668.6; 76 Fed. Reg 34386
Program Integrity Rules - Incentive Compensation	VP for Business & Finance	David Hale	AVP, Human Resources	Carl Sorensen	Shannon Sinclair, VP & General Counsel; Stephanie Dupaul, VP for Enrollment Management; Keith Gill, Athletics Director	Bonus and other compensation for individuals involved in securing enrollments or awarding financial aid	34 CFR 668.14
Scientific Misconduct	Office of the Provost	Jacque Fetrow	Office of the Provost	Kirk Jonas, Chair - IRB	School Deans	Fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results; violation of the standard codes of scholarly conduct and ethical behavior	IRB; Common Rule; National Cooperative Research Act; National Science Foundation Act; Public Health Service Act
Securities & Exchange Commission	Spider Management Company	Steve Kneeley	Spider Management Company	Jonathan Moore, Chief Compliance Officer	Shannon Sinclair, VP & General Counsel; David Hale, VP for Business & Finance	Conflicts of interest; fiduciary responsibility; prudent investment management	SOX; SEC regulations and registration requirements; reporting and disclosure requirements
Special Events	VP for Business & Finance	David Hale	Conferences and Special Events	Dee Hardy	Liz Chenery	Obtaining special events permits for activities open to the general public; temporary health permits; temporary ABC permits	FDA regulations; Virginia public health laws and regulations; ABC laws; local regulations
Student Development (including Student Honor and Judicial Councils)	VP for Student Development	Steve Bisese	Dean's Offices, all schools	School Deans		Substance abuse; cheating or plagiarism; hazing; sexual harassment; student safety; academic misconduct; honor code violations	Drug Free Schools and Communities Act (DFSCA); HEOA Drug and Alcohol Abuse regulations

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Tax and Tax-Exemption Issues	VP for Business & Finance	David Hale	Office of the Controller	Laurie Melville	Shannon Sinclair, VP & General Counsel	Public charity status - 501(c)(3); federal and state income tax reporting; tax withholding; political lobbying; statutory reporting	IRC; various state income tax laws; state employment/payroll taxes
Tax Exempt Financing Issues	VP for Business & Finance	David Hale	Office of Treasury Services	Louie Love	Shannon Sinclair, VP & General Counsel; Laurie Melville, Controller	Tax-exempt financing activities; public purpose vs. private use; arbitrage/rebate/yield restriction calculations; document retention; debt covenant compliance; continuing disclosure requirements	IRC; SEC regulations
Tax Issues -- Sales, Use, Lodging and Other Taxes	VP for Business & Finance	David Hale	Office of the Controller	Tammy Hicks	Abby Houser, Athletics; Dee Hardy, Campus Services; Deborah Summers, Modlin Center	Collection of related sales, use and lodging taxes assessed on University activities	Various state sales and use tax laws; local tax laws
Workers Compensation	VP for Business & Finance	David Hale	Safety Services and Risk Management	Keesha Trim & Dave McCoy	Carl Sorensen, AVP for Human Resource Services	Workplace safety	Virginia statutes