

University of Richmond Compliance Matrix
Compliance Offices and Officers

Compliance Areas	Cognizant Policy Officer(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; Martha Callaghan; Robb Moore	Shannon Sinclair, VP & General Counsel; Laurie Melville, Senior AVP & Controller; Cindy Deffenbaugh, Senior AVP Financial Aid	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 Development; Dining Services; Conferences and Special Events	Tracy Cassalia; Meg Pevarski; Dee Hardy; Patrick Benner	Tracy Cassalia, Substance Abuse Education and Prevention Coordinator; 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	EVP & COO	David Hale	Office of Human Resource Services	Carl Sorensen	Andrew McBride, AVP Facilities; Jeffrey Legro, Provost and EVP Academic Affairs	Employee and visitor access to campus facilities, programs, and services	Americans with Disabilities Act ("ADA"); Section 504 of the Rehabilitation Act
Americans with Disabilities Act (ADA) / Rehabilitation Act -- Facilities	EVP & COO	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; Student Development	Tina Cade; Chantelle Bernard	Andrew McBride, AVP Facilities; Alene Waller, Assistant Medical Director; Mary Churchill, CAPS	Student access to campus facilities, programs, and services	ADA; Section 504 of the Rehabilitation Act
Athletics	VP & Athletic Director	John Hardt	Athletics	Monica Mims; LaRee Sugg	Shannon Sinclair, VP & General Counsel; Cindy Deffenbaugh, Senior AVP Financial Aid; Gil Villanueva, Assoc VP & Dean of Admissions	Improper benefits; 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	EVP & COO	David Hale	Police Department	Dave McCoy	Campus Security Authority; 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; Campus SAVE Act
Conduct of Research	Provost & EVP for Academic Affairs	Jeffrey Legro	Office of the Provost	Don Forsyth, Chair - IRB; Malcohm Hill, Chair - IACUC; Kris Henderson RIO	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	President	Ronald A. Crutcher	Office of the President	Ann Lloyd Breeden	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	EVP & COO	David Hale	Office of Human Resource Services	Carl Sorensen	Shannon Sinclair, VP & General Counsel; Michelle Wamsley, Asst VP Foundations/ Corporate/ 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
Conflicts of Interest: Faculty	Provost & EVP for Academic Affairs	Jeffrey Legro	Corporate Foundation Government Relations, Office of the Provost	Michelle Wamsley	Shannon Sinclair, VP & General Counsel; Kristine Henderson, RIO; Laz Lima, Professor	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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Contracts & Procurement	EVP & COO	David Hale; Shannon Sinclair	Office of Procurement Services	Laurie Melville; Wendy Burchard; Jean Hines	Andrew McBride, AVP Facilities; Abby Houser, Assistant AD; Dee Hardy, Assoc VP Campus Services; Troy Boroughs, Assistant VP Systems & Networks	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	EVP & COO	David Hale	Office of Campus Services	Dee Hardy	Keesha Trim, 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	EVP & COO	David Hale	Office of Public Safety	Brittany Schaal	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	EVP & COO	David Hale	Spider Management Company	Rob Blandford	Laurie Melville, Sr AVP & Controller; Shannon Sinclair, VP & General Counsel; Paul Costello, COO, SMC	Conflicts of interest; fiduciary responsibility; prudent investment management	IRC; UPMIFA
Environmental Health & Safety / Fire Safety	EVP & COO	David Hale	Environmental Health & Safety	Mike Miller	Dave McCoy, AVP Campus Safety /Police Chief; Hansen-Hilliard, Student Art Lab Manager; Mike Miller, Director, Environmental Health & Safety (Lab Safety Gottwald/Radiation Safety Office)	Fire, building and facilities safety/inspections; workplace safety; 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
Export Control	Provost & EVP for Academic Affairs	Jeffrey Lego	Office of Corporate, Foundation & Government Relations; Office of Human Resource Services; Office of International Education	Michelle Wamsley; Carl Sorensen; Krittika Onsanit	Office of International Education; 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)	Provost & EVP for Academic Affairs; VP Enrollment Management	Jeffrey Legro; Stephanie DuPaul	Office of the Registrar	Susan Breeden	Cindy Deffenbaugh, Senior AVP 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.

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Financial Aid	VP for Enrollment Management	Stephanie DuPaul	Financial Aid Office	Cindy Deffenbaugh	Annemarie Weitzel, Bursar; Tammy Hicks, Accounting; Susan Breedon, 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	EVP & COO	David Hale	Office of the Controller	Laurie Melville	Paul Costello, COO, Spider Management Company	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	Michelle Wamsley	Laurie Melville, Senior AVP & Controller	Pre-award requirements; conflict of interest; conflict of commitment; regulatory review/approval (IRB/IACUC)	Title 2 CFR Part 200; Byrd Amendment; OMB-110, HHS/NIH regulations; Solomon Amendment; private sponsor requirements
Grants Administration -- Post-Award	EVP & COO	David Hale	Office of the Controller	Tammy Hicks	Laurie Melville, Senior AVP & Controller	Effort reporting; post-award spending/reporting compliance	Title 2 CFR Part 200; Byrd Amendment; OMB-110, HHS/NIH regulations; Solomon Amendment; private sponsor requirements
Higher Education Opportunity Act Amendments -- College Costs (reporting and net price calculator)	VP for Enrollment Management; VP Planning & Policy	Stephanie DuPaul; Lori Schuyler	Office of Institutional Effectiveness / Financial Aid Office	Melanie Jenkins; Cindy Deffenbaugh	Laurie Melville, Senior AVP & Controller; Shannon Sinclair, VP & General Counsel; Phillip Gravely, Asst VP Communications		20 USC 1015a
Higher Education Opportunity Act Amendments -- Disclosures to Students and Prospective Students	VP for Enrollment Management	Jeffrey Legro; Stephanie DuPaul	Registrar's Office	Susan Breedon	Melanie Jenkins, OIE; Cindy Deffenbaugh, Senior AVP Financial Aid; Laurie Melville, Senior AVP & Controller, Linda Fairtile, Librarian; Gil Villanueva, AVP & Dean of Admissions; John Barry, VP 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	Substance Abuse Education and Prevention Office	Tracy Cassalia	Sarah Sheppard, Mgr. Health Education & Wellness; Lynne Deane, Director SHC; Peter LeViness, Director CAPS	Required substance abuse education and policies	20 USC 1011i
Human Resources -- Employee Benefits	EVP & COO	David Hale	Office of Human Resource Services	Laura Dietrick	Carl Sorensen, Senior Assoc VP Human Resource Services; Shannon Sinclair, VP & General Counsel; Laurie Melville, Senior AVP & 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	EVP & COO	David Hale	Office of Human Resource Services	Leigh McCullar	Carl Sorensen, Senior Assoc VP Human Resource Services; Sharon Condrey, Director Tax Compliance and Payroll; Mike Pagano, Financial Aid Advisor (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

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Information Security	VP for Information Services	Keith McIntosh	Information Services, Information Security	Shana Bumpass	Carl Sorenson, Senior Assoc VP Human Resource Services; Susan Breeden, Registrar; Cindy Deffenbaugh, Senior AVP Financial Aid; Shannon Sinclair, VP & General Counsel; Du'Neika Easley, Asst VP for Internal Audit; Lucretia McCulley, Head Scholarly Com Initiative; 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	VP for Information Services; University Librarian	Keith McIntosh; Dee Hardy; Kevin Butterfield	Campus Services; University Communications; University Libraries	Lee Chaharyn; Sam Tanich; Lucretia McCulley	John Hardt, VP & Athletic Director; Michelle Wamsley, Asst VP Foundations/ Corporate/ Government Relations; Shannon Sinclair, VP & General Counsel	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
Intellectual Property - Invention Disclosure & Patents	Provost & EVP Academic Affairs	Jeffrey Legro	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	Provost & EVP Academic Affairs; EVP & COO	Jeffrey Legro; David Hale	Office of Human Resources; Office of International Education; International Tax Office	Krittika Onsanit; Devon Slough; Carl Sorensen	Deborah Sommers, Executive Director, Modlin Center; Mike Pagano, Financial Aid Advisor (Student Employment)	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	VP Planning & Policy	Lori Schuyler	Office of Institutional Effectiveness	Melanie Jenkins	Stephanie Dupaul, VP Enrollment Management; David Hale, EVP & COO; Cindy Deffenbaugh, Senior AVP Financial Aid; Steve Bisese, VP Student Development	Reporting required under applicable Department of Education regulations; HEOA Consumer information	20 USC Section 1015a
Minors on Campus	EVP & COO	David Hale	Risk Management	Keesha Trim	Liz Chenery, Director of Events & Conf. Services; Abby Houser, Asst AD Business Operations; Carl Sorensen, Senior Assoc VP Human Resource Services		VA Code 63.2-1509
Non-Discrimination / Harassment -- Faculty and Staff	EVP & COO	David Hale	Office of Human Resource Services	Carl Sorensen	Shannon Sinclair, VP & General Counsel; Jeff Legro, Provost EVP & Academic Affairs; Academic Deans	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	Compliance/ Title IX	Kris Henderson; Tracy Cassalia	Mia Genoni, Dean (WC); Joe Boehman, Dean (RC); 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

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PCI-DSS	EVP & COO	David Hale	Treasury Services; Network Services; Credit Card Merchants	Credit Card Merchant Managers, various; Val Cemprola; Troy Boroughs	Steven Walker, Director, Financial Aid & Reporting; Keith McIntosh, VP for Information Security	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; Lynne Deane	Tom Roberts, Assoc VP Health & Wellness; Shana Bumpas, Director of Information Security	Counseling & psychological services records; student health center records	FERPA; Gramm Leach Bliley; Virginia Health Records Privacy Act
Privacy -- Employment & Benefit Records	EVP & COO	David Hale	Office of Human Resource Services	Laura Dietrick; Denise Jones	Shana Bumpas, Director of Information Security	Employee records; disciplinary actions; health insurance records; claims information	Gramm Leach Bliley; Virginia Health Records Privacy Act; HIPPA; institutional policies
Privacy -- Financial Records	EVP & COO	David Hale	Office of the Controller; Office of Treasury Services; Advancement Services	Annemarie Weitzel; Sharon Condrey; Jean Hines; Rob Moore,	Shana Bumpas, Director of Information Security	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	Provost & EVP Academic Affairs	Jeffrey Legro	Dean's Office, School of Continuing Studies	Jamelle Wilson	Melanie Jenkins, Director IFX; Cindy Deffenbaugh, Senior AVP 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	EVP & COO; VP Enrollment Management	David Hale; Stephanie DuPaul	Office of Human Resource Services	Carl Sorensen	Shannon Sinclair, VP & General Counsel; John Hardt, VP & Athletics Director; Cindy Deffenbaugh, Senior AVP Financial Aid; Gil Villanueva, AVP & Dean of Admissions	Bonus and other compensation for individuals involved in securing enrollments or awarding financial aid	34 CFR 668.14
Scientific Misconduct	Provost & EVP Academic Affairs	Jeffrey Legro	Office of the Provost; Compliance/ Title IX	Don Forsyth; Kris Henderson	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	President or CIO; Spider Management Company	Rob Blandford	Spider Management Company	Paul Costello	Shannon Sinclair, VP & General Counsel; David Hale, SVP & COO	Conflicts of interest; fiduciary responsibility; prudent investment management	SOX; SEC regulations and registration requirements; reporting and disclosure requirements
Special Events	EVP & COO	David Hale	Campus Services; 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
Tax and Tax-Exemption Issues	EVP & COO	David Hale	Office of the Controller	Laurie Melville	Shannon Sinclair, VP & General Counsel; Robb Moore, Assistant VP Advancement	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

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Tax Exempt Financing Issues	EVP & COO	David Hale	Office of the Controller	Laurie Melville	Shannon Sinclair, VP & General Counsel	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	EVP & COO	David Hale	Office of the Controller	Tammy Hicks	Abby Houser, Assistant AD Business Operations; Dee Hardy, Assoc VP Campus Services; Deborah Summers, Executive Director 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	EVP & COO	David Hale	Risk Management	Keesha Trim	Carl Sorensen, AVP for Human Resource Services; Mike Miller, Director, Environmental Health & Safety; Dave McCoy, AVP Campus Safety/Police Chief	Workers' compensation claims processing; workplace safety	Virginia statutes