

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
<b>Advancement &amp; Charitable Giving</b>	VP for Advancement	Martha Callaghan	Advancement Services; Development; Foundation, Corporate & Government Relations; Gift Planning; Annual Giving; Donor Relations	Jennifer Stancil; Robb Moore	Shannon Sinclair, VP & General Counsel; Laurie Melville, Senior Associate VP and Controller; Chip Bryan, AVP and Director, Financial Aid; Du'Neika Easley, Assistant VP for 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
<b>Alcohol Use on Campus</b>	VP for Student Development	Steve Bisese	Student Involvement; Dining Services; Conferences and Special Events	Andy Gurka; Terry Baker; Caroline Kirkland Reynolds	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;
<b>Americans with Disabilities Act (ADA) / Rehabilitation Act -- Employees</b>	VP for Business & Finance	David Hale	Office of Human Resource Services	Geraldine Sullivan	Paul Lozo, Executive Director of Facilities Operation; Joan Saab, Executive VP and Provost (faculty matters); Steve Bisese, VP for Student Development	Employee, student and visitor access to campus facilities and reasonable accommodations	ADA; Section 504 of the Rehabilitation Act
<b>Americans with Disabilities Act (ADA) / Rehabilitation Act -- Facilities</b>	VP for Business & Finance	David Hale	Facilities	Paul Lozo		Employee, student and visitor access to campus facilities	ADA; Section 504 of the Rehabilitation Act
<b>Americans with Disabilities Act (ADA) / Rehabilitation Act -- Students</b>	VP for Student Development	Steve Bisese	Student Health Center; VP for Student Development	Cort Schneider	Paul Lozo, Executive Director of Facilities Operations	Employee, student and visitor access to campus facilities	ADA; Section 504 of the Rehabilitation Act
<b>Athletics</b>	Athletic Director	John Hardt	Athletics	Ryan Colton; LaRee Sugg	Shannon Sinclair, VP & General Counsel; Chip Bryan, AVP and Director, Financial Aid; Du'Neika Easley, Assistant VP for 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
<b>Campus Security - Crime and Fire Statistics and Reporting</b>	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
<b>Conduct of Research</b>	Office of the Provost	Joan Saab	Office of the Provost	Jeffrey Hass Chair - IRB; Jory Brinkerhoff, 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
<b>Conflicts of Interest: Board of Trustees &amp; Senior Management</b>	Office of the President	Kevin F. Hallock	Office of the President	Ann Lloyd Breedon	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

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<b>Conflicts of Interest: Staff</b>	VP for Business & Finance	David Hale	Office of Human Resource Services	Geraldine Sullivan	Shannon Sinclair, VP & General Counsel; Jennifer Stancil, Assistant VP for 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
<b>Conflicts of Interest: Faculty</b>	Office of the Provost	Joan Saab	Office of the Provost	Linda Boland	Shannon Sinclair, VP & General Counsel; Jennifer Stancil, Assistant VP for 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
<b>Contracts &amp; Procurement</b>	VP for Business & Finance; VP & General Counsel	David Hale; Shannon Sinclair	Office of Procurement Services	Wendy Burchard	Terry Baker, Executive Director, Dining Services; Troy Boroughs, Asst VP Systems & Networks	Conflicts of interest; contract administration; compliance with contractual provisions; Collegiate Licensing	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
<b>Dining &amp; Catering Services</b>	VP for Business & Finance	David Hale	Office of Campus Services	Terry Baker	Keesha Trim, Director of 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
<b>Emergency Management</b>	VP for Business & Finance	David Hale	Office of Public Safety	Maribel Street	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
<b>Endowment Management -- UPMIFA</b>	VP for Business & Finance	David Hale	Spider Management Company	Jonathan Moore	Laurie Melville, Senior Associate VP and Controller; Shannon Sinclair, VP & General Counsel	Conflicts of interest; fiduciary responsibility; prudent investment management	IRC; UPMIFA

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<b>Environmental Health &amp; Safety / Fire Safety</b>	VP for Business & Finance	David Hale	Environmental Health and Safety	Mike Miller	Steve Bisese, VP for Student Development; School Deans	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
<b>Export Control</b>	Office of the Provost	Joan Saab	Office of Corporate, Foundation & Government Relations; Office of Human Resource Services; Office of International Education	Jennifer Stancil; Geraldine Sullivan; Krittika Onsanit	International Studies; School Deans; Compliance Office	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
<b>Family Educational Rights &amp; Privacy Act (FERPA)</b>	Office of the Provost	Joan Saab	Office of the Registrar	Kristen Ball	Chip Bryan, AVP and Director of Financial Aid; Annemarie Weitzel, Bursar, Stephanie Dupaul, VP Enrollment Management	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.
<b>Financial Aid</b>	VP for Enrollment Management	Stephanie Dupaul	Office of Financial Aid	Chip Bryan	Annemarie Weitzel, Bursar; Du'Neika Easley, Assistant VP for Internal Audit; Kristen Ball, 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
<b>Financial Management</b>	VP for Business & Finance	David Hale	Office of the Controller	Laurie Melville	Jonathan Moore, Chief Administrative Officer, Spider Management Company; Du'Neika Easley, Assitant VP for 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

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<b>Grants Administration -- Pre-Award</b>	VP for Advancement	Martha Callaghan	Office of Corporate, Foundation & Government Relations	Jennifer Stancil	Jennifer Stancil, Assistant VP, Office of Corporate, Foundation & Government Relations; Tammy Hicks, Grants Accounting	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
<b>Grants Administration -- Post-Award</b>	VP for Business & Finance	David Hale	Office of the Controller	Tammy Hicks	Laurie Melville, Senior Associate VP and 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
<b>Higher Education Opportunity Act Amendments -- College Costs (reporting and net price calculator)</b>	Office of the Provost; VP for Enrollment Management	Joan Saab; Stephanie Dupaul	Office of Institutional Effectiveness / Financial Aid Office	Melanie Jenkins; Chip Bryan	Laurie Melville, Senior Associate VP and Controller; Shannon Sinclair, VP & General Counsel; Phillip Gravely, Assistant VP Communications		20 USC 1015a
<b>Higher Education Opportunity Act Amendments -- Disclosures to Students and Prospective Students</b>	Office of the Provost; VP for Enrollment Management	Joan Saab; Stephanie Dupaul	Registrar's Office	Kristen Ball	Melanie Jenkins, Director, OIE; Chip Bryan, Financial Aid; Laurie Melville, Senior Associate VP and Controller, Linda Fairtile, Librarian; Tom Addonizio, VP for Communications and Chief Marketing Officer	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
<b>Higher Education Opportunity Act Amendments -- Drug and Alcohol Abuse Prevention</b>	VP for Student Development	Steve Bisese	Deputy Title IX Director	Tracy Cassalia	Dr. Latrina Lemon, Medical Director; Peter LeViness, Director CAPS	Required substance abused education and policies	20 USC 1011i
<b>Human Resources -- Employee Benefits</b>	VP for Business & Finance	David Hale	Office of Human Resource Services	Laura Dietrick	Geraldine Sullivan, Chief Human Resources Officer ; Shannon Sinclair, VP & General Counsel; Laurie Melville, Senior Associate VP and Controller	Employee benefits; retirement; misrepresentation of conditions or eligibility for tuition or other benefits	IRC; ERISA; COBRA; cafeteria plan regulations; HIPAA; OWBPA; USERRA

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<b>Human Resources -- Employment Issues</b>	VP for Business & Finance	David Hale	Office of Human Resource Services	Geraldine Sullivan	Geraldine Sullivan, Chief Human Resources Officer ; Sharon Condrey, Payroll;	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
<b>Information Security</b>	VP for Information Services	Keith McIntosh	Information Services Infomoration Security	John Craft	Geraldine Sullivan, Chief Human Resources Officer, Kristen Ball, University Registrar; Chip Bryan, AVP and Director Financial Aid; Shannon Sinclair, VP & General Counsel; Du'Neika Easley, Assistant VP for 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
<b>Intellectual Property - Copyrights &amp; File Sharing</b>	Office of the Provost; VP for Information Services; VP for Development	Joan Saab, Keith McIntosh	University Communications; University Libraries	Tom Addonizio, VP Communications and Chief Marketing Officer	Jennifer Stancil, Assistant VP for 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
<b>Intellectual Property - Invention Disclosure &amp; Patents</b>	Office of the Provost; VP for Development	Joan Saab	Office of Corporate, Foundation & Government Relations	Jennifer Stancil	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
<b>International /Immigration Issues</b>	Office of the Provost; VP for Business & Finance	Joan Sabb; David Hale	International Education; International Tax Office	Krittika Onsanit	Carl Sorensen, Senior Associate VP for 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;
<b>IPEDS Data Reporting</b>	Office of the Provost	Joan Saab	Office of Institutional Effectiveness	Melanie Jenkins	Stephanie Dupaul, VP For Enrollment Management; David Hale, Executive VP and COO; Chip Bryan, AVP and Director of Financial Aid; Steve	Reporting required under applicable Department of Education regulations; HEOA Consumer information	20 USC Section 1015a

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<b>Minors on Campus</b>	VP and General Counsel	Shannon Sinclair	Office of Risk Management	Keesha Trim	Dave McCoy, AVP Campus Safety/Police Chief	Reporting the suspected abuse or neglect of a minor	VA Code 63.2-1509
<b>Non-Discrimination / Harassment -- Faculty and Staff</b>	VP for Business & Finance	David Hale	Office of Human Resource Services	Geraldine Sullivan	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
<b>Non-Discrimination / Harassment -- Student</b>	VP for Student Development	Steve Bisese	Title IX Associate Coordinator	Tracy Cassalia, 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
<b>PCI-DSS</b>	VP for Business & Finance	David Hale	Treasury Services; Network Services; Credit Card Merchants	Credit Card Merchant Managers (various); Troy Boroughs, Information Services	Laurie Melville, Senior Associate VP and Controller; Keith McIntosh, VP and CIO	Credit card security	PCI-DSS Contract Standards
<b>Privacy -- Clinical Records</b>	VP for Student Development	Steve Bisese	Counseling and Psychological Services; Student Health Center	Peter LeViness, Director of CAPS; Dr. Latrina Lemon, Medical Director	Information Services	Counseling & psychological services records; student health center records	FERPA; Gramm Leach Bliley; Virginia Health Records Privacy Act
<b>Privacy -- Employment &amp; Benefit Records</b>	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
<b>Privacy -- Financial Records</b>	VP for Business & Finance	David Hale	Office of the Controller; Office of Treasury Services; Advancement Services	Annemarie Weitzel; Sharon Condrey; Laurie Melville	Information Services	Banking records; loan records; other financial information	Gramm Leach Bliley; Virginia Health Records Privacy Act; FTC Red Flag Regulations; PCI-DSS
<b>Program Integrity Rules - Gainful Employment</b>	Office of the Provost	Joan Saab	Dean, School of Continuing Studies	Jamelle Wilson	Melanie Jenkins, Director, OIE; Chip Bryan, AVP and Director of Financial Aid; Kristen Ball, 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
<b>Program Integrity Rules - Incentive Compensation</b>	VP for Business & Finance	David Hale	AVP, Human Resources	Geraldine Sullivan	Shannon Sinclair, VP & General Counsel; Stephanie Dupaul, VP for Enrollment Management; John Hardt, Director of Athletics	Bonus and other compensation for individuals involved in securing enrollments or awarding financial aid	34 CFR 668.14

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<b>Scientific Misconduct</b>	Office of the Provost	Joan Saab	Office of the Provost	Jeff Hass, Chair - IRB, Jory Brinkerhoff, Chair - IACUC, RIO 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
<b>Securities &amp; Exchange Commission</b>	Spider Management Company		Spider Management Company	Jonathan Moore, Chief Administrative Officer	Shannon Sinclair, VP & General Counsel; David Hale, Executive VP and COO	Conflicts of interest; fiduciary responsibility; prudent investment management	SOX; SEC regulations and registration requirements; reporting and disclosure requirements
<b>Special Events</b>	VP for Business & Finance	David Hale	Conferences and Special Events	Terry Baker	Assistant Director of Events, Conference and Support Services	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
<b>Student Development (including Student Honor and Judicial Councils)</b>	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
<b>Tax and Tax-Exemption Issues</b>	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
<b>Tax Exempt Financing Issues</b>	VP for Business & Finance	David Hale	Controller	Laurie Melville	Shannon Sinclair, VP & General Counsel; Laurie Melville, Senior Associate VP and 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
<b>Tax Issues -- Sales, Use, Lodging and Other Taxes</b>	VP for Business & Finance	David Hale	Office of the Controller	Tammy Hicks	Terry Baker, Director, Dining Services ; Shannon Hooker, Assistant 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
<b>Workers' Compensation</b>	VP and General Counsel	Shannon Sinclair	Office of Risk Management	Keesha Trim	Geraldine Sullivan, Chief Human Resources Office, Mike Miller, Director of Environmental Health and Safety	Workplace safety; Occupational injury and illness; workers' compensation claims management	VA Code 65.2 Virginia Workers' Compensation Act