

Washington and Lee University

Compliance Matrix

COMPLIANCE AREA	COGNIZANT POLICY OFFICER	COMPLIANCE PARTNER(S)	REPRESENTATIVE ISSUES	APPLICABLE FEDERAL LAWS
Academic Programs	Provost	Dean of Career and Professional Development Assistant Dean of Career Strategy/Law Dean of the College Dean of the Williams School Dean of the Law School Associate Provost Externship Program Director Director of Education Studies Director of Shepherd Program	Externships/Internships and Placement; Constitution Day; Releases/Waivers; Non-Discrimination; Immigration Issues/Visas; Domestic and Foreign Programs Off-Campus; Faculty Re-Appointments, Promotion and Tenure	Title VI/IX; Immigration and Nationality Act; SEVP; FERPA; State Authorizations
Asset Management / Endowment	Treasurer/VP for Finance & Administration	Treasurer/VP for Finance & Administration	Institutional Conflict of Interest; Non-Profit Requirements; Fiduciary Obligations	SOX; IRC State Fiduciary Laws
Athletics (including Gym and Wellness Center)	Director of Athletics Provost	Title IX Coordinator and Director of Disability Resources Associate Athletic Director	Title IX / Gender Equity; Liability (incl. consent/release forms); Trainers; Recruiting; NCAA; Student Records; Transportation; Summer Camps	Equity in Athletics Disclosure Act; Title IX; FERPA
Campus Security	VP for Student Affairs/DOS	Director of Public Safety	Clery Act Reporting; Emergency Planning; Incident/Accident Investigations; Law Enforcement Records/Student Records; Missing Student Notification	Clery Act; Campus Sex Crimes Prevention Act; Campus Sexual Assault Victim Bill of Rights; VAWA; HEOA; FERPA
Civil Rights / Non-Discrimination / Harassment / EEOC / OCR / Diversity	Treasurer/VP for Finance & Administration VP for Student Affairs/DOS Provost	Title IX Coordinator and Director of Disability Resources Executive Director of HR Vice President for Student Affairs/Dean of Students Dean of Diversity, Inclusion and Student Engagement	ADA; ADEA; Title VI and Title VII; Section 504; Title IX; Academic and Work Environment; Policies and Complaint Reporting/Investigation Systems; Training of University Officials; Hiring/Promoting Criteria and Process; Diversity Statement; Recordkeeping	Age Discrimination Act of 1975; ADEA; ADA; Civil Rights Acts (Titles VI, VII); Education Amendments (Title IX); Equal Pay Act; Fair Housing Act; Immigration and Nationality Act; OWBPA; Pregnancy Discrimination Act; USERRA; GINA; HEOA

		Assistant Dean, Law Student Affairs		
Communications / Media Relations / Newspapers & Newsletters / Web Design	VP for University Advancement Provost Chief Communications Officer	Editor, Shenandoah Associate Director of Communications & Public Affairs Web Developer/Web Accessibility Coordinator	Libel/Slander; Confidentiality; Copyright; Web Accessibility	Copyright Act; FERPA; Gramm Leach Bliley; HIPAA; HEOA
Contracts / Procurement	General Counsel	Associate General Counsel Associate Treasurer Chief Technology Officer	Conflict of Interest; Contract Administration Policy; Compliance Provisions in Contracts (e.g. FERPA, HIPAA, GLB, Intellectual Property); Web & Technology (Software) Accessibility	Anti-Kickback Act of 1986; Byrd Amendment; Contract Disputes Act; Copeland Anti-Kickback Act; E-SIGN Act; Trading With the Enemy Act; ADA/WCAG 2.0
Development / Advancement	VP for University Advancement	Executive Director of Development	Donor Gifts; Gift Restrictions; Confidentiality; Volunteers; CAN-SPAM?; Charitable Substantiation Rules; PCIDSS (credit card use)	Pension Protection Act; Philanthropy Protection Act; Substantiation and Disclosure Provisions; FERPA (student records of alumni/donors); HEOA; Charitable Registration Laws (States)
Dining Services	VP for Student Affairs/DOS	Director of Dining Services	Food Acquisition, Handling, & Storage; Public Health Inspections; ABC Laws; Facilities Use; ADA/504 in dining	FDA Regulations; ADA/504 accommodations
Disability Services	Provost Treasurer/VP for Finance & Administration Vice President for Student Affairs and Dean of Students Chief Communications Officer	Title IX Coordinator and Director of Disability Resources Assistant Dean, Law Student Affairs Dean of Student Life Executive Director of HR Exec. Dir. of University Facilities Chief Technology Officer Web Developer/Web Accessibility Coordinator	Employee, Student and Visitor Access/Accommodations under ADA/504; Service and Assistance Animals; Web & Technology Accessibility	ADA; Section 504
Emergency Management	VP for Student Affairs/DOS Chief Communications Officer	VP for Student Affairs/DOS Director of Public Safety Chief Communications Officer	Local Agency Relations; Public Health Issues; Transportation; Goods & Supplies; Communications; Documented Plan	Clery Act; HEOA; FERPA

<p>Environmental Health and Safety</p>	<p>Treasurer/VP for Finance & Administration</p>	<p>Director of Environmental Health and Safety Chemical Hygiene Officer</p>	<p>Vehicle, Fire, Building and Facilities Safety/Codes; OSHA / Workplace Safety; Workers' Compensation; Chemicals; Waste Management; HazMat; Lab Safety; DHS & EPA Regulations</p>	<p>Chemical Facility Anti-Terrorism Standards; CERCLA; EPCRA; Hazardous Materials Transportation Act; Federal Insecticide, Fungicide and Rodenticide Act; Residential Lead-Based Paint Hazard Reduction Act; Motor Carrier Act of 1980; OSHA; The Public Health Security and Bioterrorism Preparedness and Response Act; Resource Conservation and Recovery Act; Toxic Substances Control Act; Bloodborne Pathogens Standard; HEOA</p>
<p>Employee Welfare Benefit Plans</p>	<p>Treasurer/VP for Finance & Administration</p>	<p>Executive Director of HR</p>	<p>TIAA-CREF 403(b) and 457(b); 457(f); Deferred Compensation; ERISA plans -- health, dental, flexible spending, retiree plans, etc.; HIPAA</p>	<p>Cafeteria Plan Regs.; COBRA; ERISA; HIPAA; OWBPA; Retirement and Other Deferred Compensation Arrangements; USERRA; PPACA</p>
<p>Federal & State Notice and Disclosure</p>	<p>General Counsel</p>	<p>Registrar Executive Director of Strategic Analysis and Institutional Research Executive Director of HR Director of Public Safety Vice President for Admissions and Financial Aid Assistant Dean, Law Student Affairs Director of Financial Aid Vice President for Student Affairs and Dean of Students Title IX Coordinator and Director of Disability Resources</p>	<p>IPEDS; SRTK; Clery; EADA; DFW; DFSCA; Institutional Information; PPAs; Other notices/disclosures for fed'l aid recipients; Reg E & Z; DOL</p>	<p>Student Right to Know; Clery Act; Campus Sex Crimes Prevention Act; Campus Sexual Assault Victim Bill of Rights; VAWA; Veterans' Benefits Improvement Act; HEOA; Title IV; Annual Certification re Sex Harassment Policy to SCHEV</p>
<p>Financial Aid & Admissions</p>	<p>President</p>	<p>Vice President for Admissions and Financial Aid Director of Financial Aid</p>	<p>Awards/Disbursements; Institutional Eligibility for Title IV Funds; Obligations Under Title IV; Federal Work Study; Diversity</p>	<p>Age Discrimination Act of 1975; FERPA; Federal Grant and Loan Programs; Program Participation Agreements; IDEA Grants; Military Selective Service Act; Program Integrity Triad; Student Loan Default Prevention Initiative Act of 1990;</p>

				Federal Work Study Requirements; Higher Ed. Act/Amendments (Title IV); HEOA
Fiscal Management	Treasurer/VP for Finance & Administration	Associate Treasurer	Cash; Credit & Debit Cards; Allowable Expenses; Property Inventory; System Controls; Accounts Payable/Receivable; Purchasing; PCI DSS; Federal Grant Reporting	Anti-Terrorist Financing Guidelines; Bankruptcy Reform Act; Regulation E; Regulation Z; FCRA; OMB A-21; Social Security Act and FICA; Tuition Payment Credit Reporting Requirements; TILA; Federal Unemployment Tax Act; UBIT; Anti-Terrorist Financing Guidelines; HEOA
Governance	Secretary of the University General Counsel	General Counsel	Conflicts of Interest; Bylaws and Articles of Incorporation; Board of Trustees; Committees; IRS and SOX Reqs; Executive Compensation; Whistleblower	SOX; IRS Regs. and Good Governance practices; Federal Sentencing Guidelines; Virginia corporate law
Grants Administration	VP for University Advancement Provost	Director of Corporate and Foundation Relations Associate Treasurer	Pre-Award Requirements; Effort Certifications; Post-Award Requirements; Financial Reporting; Regulatory Review/Approval	Byrd Amendment; IRB; OMB A-110; HEOA; HHS/NIH Regs
Human Resources	Treasurer/VP for Finance & Administration	Executive Director of HR	Workers' Compensation; Employment Benefits & Leaves; FMLA; USERRA; Wage/Hour; Personnel Policies; Recruiting/Hiring; Supervisor Training; Termination/Departure/Early Retirement	FLSA; 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 Educational and Cultural Exchange Act; NLRA; OSHA; OWBPA; Personal Responsibility and Work Opportunity Act; Rehabilitation Act of 1973; Social Security Act and FICA; Federal Unemployment Tax Act; USERRA; Federal Volunteer Protection Act; HEOA; PPACA

<p>Information Privacy and Security</p>	<p>General Counsel</p>	<p>Chief Technology Officer Chief Information Security Officer Registrar Director of Student Health/ Counseling Executive Director of HR Treasurer/VP for Finance & Administration Associate Treasurer Associate General Counsel</p>	<p>Student Records (FERPA, Va. Patient Health Records Privacy Act, ADA); Employee Medical Records (ADA); Personal Financial Information (GLB and W&L ISP); Employee Protected Health Information (HIPAA); Credit Cards (PCIDSS); Information Security Program; ITAR / EAR; Identity Theft Program and Background Checks Records (FACTA)</p>	<p>FERPA; GLBA; PCIDSS; HIPAA; ADA; Solomon Amendment; FACTA; USA Patriot Act</p>
<p>Insurance</p>	<p>Treasurer/VP for Finance & Administration</p>	<p>Assistant Director for Programs and Risk Management</p>	<p>Required/Recommended Types, Scope & Coverage Limits; Incident Reporting; Required & Best Practices for Covered Compliance Areas; Indemnity; Insurance Certificate Tracking; Contract Requirements</p>	<p>(State laws)</p>
<p>International Issues</p>	<p>Provost Treasurer/VP for Finance & Administration</p>	<p>Director of International Education Associate Director of International Education Provost Dean of the College Dean of the Williams School Dean of the Law School Executive Director of HR Associate Treasurer</p>	<p>Study Abroad; Foreign Scholars & Students; Visiting Artists/Lecturers; Immigration (Taxes & SEVP)</p>	<p>Immigration and Nationality Act; Mutual Educational and Cultural Exchange Act; Presidential Executive Orders; Export Controls</p>
<p>Intellectual Property</p>	<p>Provost Treasurer/VP for Finance & Administration</p>	<p>Chief Technology Officer Director, Lenfest Center Dean of the College Dean of the Williams School Director, Global Discovery Labs Manager, Copying Services Assistant Dean of Legal Information Services Associate Dean, Law School University Librarian</p>	<p>Copyrights; University Marks; License Agreements; DMCA; PTP; ASCAP/BMI Licenses</p>	<p>American Jobs Creation Act of 2004; Visual Artists Rights Act; Bayh-Dole Act of 1980; CREATE Act; DMCA; Copyright Law; Copyright Term Extension Act; Lanham Act; Trademark Revision Act; Copyright Term Extension Act; HEOA</p>

		Director of Corporate and Foundation Relations Executive Director of Auxiliary Services General Counsel		
IT / Computing	Provost	Chief Technology Officer	Internet File-Sharing; DMCA Agent; Appropriate Use/Access; Email Privacy; Network Security; PCI DSS; Web & Technology Accessibility; Export Controls	CAN-SPAM; CALEA; ECPA; DMCA; No Electronic Theft Act; HEOA; Communications Decency Act
Records Retention / Management / E-Discovery and Document Production Requests	General Counsel	Chief Technology Officer Associate General Counsel	Record Retention Policy and Schedule; Litigation Holds; Response to Law Enforcement / Agency Inquiries	FERPA; SOX; Federal Sentencing Guidelines
Research	Provost Vice President for University Advancement	Research Integrity Officer/Dean of the College Chair of IRB Chair of Institutional Animal Use & Care Committee Executive Director for University Development Director of Corporate and Foundation Relations	Human Subjects (IRB); Animal Use & Care; Scientific Misconduct; Informed Consent; ITAR / EAR (Export Controls) Government and Private Grant Applications & Oversight; Effort Reporting	IRB; National Cooperative Research Act; National Science Foundation Act; Public Health Service Act; HEOA
Student Affairs	VP for Student Affairs/DOS	Director of Outdoor Education and Recreation Director of Residence Life Director of Greek Life Dean of Student Life Assistant and Associate Deans of Students/Undergraduate Assistant Dean, Law Student Affairs Title IX Coordinator and Director of Disability Resources Dean of Diversity, Inclusion and Student Engagement	Alcohol; Greek Organizations; Student Organizations; Traveller and Student Transportation; Student Sexual Misconduct Residential Life, ADA/504 in housing and education programs Student Discipline	DFSCA; ADA/Rehabilitation Act of 1973; FERPA; HEOA; Title IX

Student Health and Counseling	VP for Student Affairs/DOS	Director of Student Health/Counseling	Health and Counseling Center; Troubled Students; State & local reporting; student insurance	FERPA; ADA; Controlled Substances Act; (Virginia Patient Health Records Privacy Act)
Summer Camps / Special Events	Vice President for University Advancement Provost	Dir. of Special Events Director of Athletics Director of Lifelong Learning Programs Executive Director of HR Director, Global Discovery Labs Associate Provost	Releases/ Waivers and Facilities Use Forms; Indemnification; Assumptions of Risk; Parental Consent Forms; Appropriate Supervision; Background Checks; Insurance; Best Practices	Hotel and Motel Fire Safety Act of 1990;
Tax Issues	Treasurer/VP for Finance & Administration	Associate Treasurer General Counsel	501(c)(3) Issues; 990 Issues; State Taxes; Tax Reporting Obligations; UBIT; Benefit Plans; Fringe Benefits; Income Tax Withholding; Bond/Debt.Mgmt.; Restrictions on Political Campaigns Events, Legislative Liaison Matters, etc.	Cafeteria Plans; IRS Regulations Related to Donations; Charitable Gift Annuity Antitrust Relief Act; Fringe Benefits; House and Senate Gift Rules; Ethics in Government Act (amended by Ethics Reform Act and HLOGA); Independent Contractor; Intermediate Sanctions for Excess Benefits; Internal Revenue Code; Byrd Amendment; Political Activities; Lobbying Disclosure Act; Reporting of Payments to Attorneys; Form 990 and Public Disclosure Requirements; Qualified Tuition Reductions; Quid Pro Quo Rules; Retirement and Other Deferred Compensation Arrangements; Scholarships and Fellowships; Section 127 Educational Assistance Programs; Small Business Job Protection Act; Student Loan Interest Reporting; Federal Unemployment Tax Act; UBIT
WLUR Radio Station	Vice President for University Advancement	WLUR General Manager	Slander; FCC Requirements and Filings	FCC Regulations; Small Webcaster Settlement Act

Miscellaneous				Sherman Act; Clayton Act; National Historic Preservation Act of 1996; USA PATRIOT Act; FTC Act
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