## UNIVERSITY OF HOUSTON COMPLIANCE MATRIX

This **Compliance Matrix** details the decentralized matrix of UH officers and administrators responsible for specific compliance areas, coordinated and supported by the Office of General Counsel, the Office of Internal Audit, and the Chief Compliance Officer.

The **Accountable Senior Officer with Oversight Responsibilities** "**Responsible Person"** is a member of Administration with overall operational responsibility for the designated compliance area.

The **Functionally Responsible Contact** is the administrator or staff member with day-to-day responsibility for the designated compliance area.

Compliance Area	Accountable Department/Division/Office	Accountable Senior Officer with Oversight Responsibilities "Responsible Person"	Functionally Responsible Contact	Representative Issues	Representative Laws and Guidance
Academic Affairs Division	Office of the Provost	Robert McPherson, Interim Provost bmcph@uh.edu	Mark Clarke, Assoc. VP Faculty Development/Affairs mclarke@uh.edu  Sabrina Hassumani, Assoc. VP Academic Affairs Finance & Administration shassumani@uh.edu  College Deans	Faculty appointments, reappointments, promotions, and tenure; privacy; budgets; SACS  Academic Fee Management Equity Balances; ensuring financial accountability and compliance with state and university guidelines  Academic honesty	Title VI, VII, IX of Civil Rights Act; FERPA; Texas Ed Code; Faculty Handbook  MAPP 11.03.01 SAM 03.G.01 MAPP and SAMs related to financial accountability
Accounting/Fiscal Management	Finance – Accounts Payable, Tax Department, Financial Reporting and Accounting Services	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Karin Livingston AVP for Finance klivingston@uh.edu .	Usha Mathew, Controller umathew@central.uh.edu	Internal controls; property inventory; accounting, financial reporting, travel, and payment for expenditures	Tax Code; Texas Ed Code; Red Flag Rules
Accreditation	Office of the Provost	Robert McPherson, Interim Provost bmcph@uh.edu	Joseph Curtin, Assoc. Provost, Inst. Research jcurtin@uh.edu	University accreditation (SACS); UH Quality Enhancement Plan (QEP)	HEOA, SARA, SACS and Programmatic Accreditations; THECB reporting requirements

Admissions	Student Affairs	Robert McPherson, Interim Provost bmcph@uh.edu	Mardell Maxwell, Exec. Dir. Of Admissions mrmaxwell@uh.edu	Privacy; diversity; non- discrimination	FERPA; Texas Ed Code
Advancement	Office of University Advancement	Eloise Brice, VP University Advancement edstuhr@uh.edu	Bob Leaumont, AVP Advancement Operations rfleaumo@uh.edu	Donor instructions; IRS rules on gifts/endowments; state regs on solicitation and confidentiality of donor identity	State registration requirements; Gift terms; IRS regulations; Philanthropy Act of 1995; CAN-SPAM Act
Assets, Endowment, Banking	Office of the Treasurer	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Karin Livingston AVP for Finance klivingston@uh.edu	Louis Edwards, Treasurer <u>lwedwards2@uh.edu</u>	Endowment spending; fiduciary obligations; public finance	SEC regulations; State and Federal banking regulations; IRS Regulations; UPMIFA, GLBA
Athletics	Athletics	Chris Pezman, VP Intercollegiate Athletics cwpezman@uh.edu	Lauren DuBois, Sr. Assoc. Athletic Director ledubois@uh.edu	Gender equality (reporting and compliance); recruiting; records; NCAA compliance; protection of minors; consent and release forms	Equity in Athletics Disclosure Act; Title IX; FERPA; NCAA
Campus Safety and Security	UHPD	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Ceaser Moore, Chief of Police cmoore@uh.edu	Law Enforcement. Brett Collier, Captain, Field Operations bcollier@uh.edu  Clery and related compliance Wiley Graham, Clery Coordinator wagraham@uh.edu	Emergency planning; law enforcement; campus carry enforcement  Clery Act reporting; VAWA compliance and reporting; Campus SaVE Act reporting	Clery Act; The Campus Sexual Assault Victim Bill of Rights; Campus Sex Crimes Prevention Act; Title IX; VAWA; Campus SaVE Act; Campus Carry law
Compliance and Ethics	Office of Compliance and Ethics	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Susan Koch, Chief Compliance Officer sfkoch2@uh.edu	Ethical culture; compliance issues; compliance training	Federal Sentencing Guidelines for Organizations; Federal Ethics statutes; Texas Government and Penal Code; OMB Uniform Guidance; FAR

Contract Administration	Office of Contract Administration	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Contracts: Mark Yzaguirre, Assoc. VC/VP & Assoc. GC, Office of Contracts Administration myzaguirre@uh.edu  Donna Halton, Contract Manager contractadmin@uh.edu  Real Estate & Construction Contracts: recc@central.uh.edu	Contract administration; compliance with relevant state contracting laws	Texas Government Code; Texas Education Code
Copyright	University Information Technology	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Dona Cornell, VP, General Counsel dhcornell@uh.edu  Unit Leader: Dennis Fouty, Assoc. VP IT dfouty@uh.edu	Mary Dickerson, Ass't VP, IT Security mdickerson@uh.edu	Fair Use; course materials; music downloads; university logos and licensing; peer to peer file sharing	Digital Millennium Copyright Act; Copyright Act; HEOA; Visual Arts Rights Act; Bayh-Dole Act; CREATE Act; Copyright Term Extension Act; Lanham Act; Trademark Revision Act; TEACH Act
Disability Accommodations (Students)	Justin Dart, Jr. Student Accessibility Center	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Kyle Mutz, Director kjmutz@uh.edu	Academic accommodations for students	ADA (Title I and III); Section 504 of Rehabilitation Act of 1973
Disability Accommodations (Employees)	Equal Opportunity Services	Raymond Bartlett, Sr. VP Administration & Finance rbartlett@uh.edu	Rebecca lake, Ass't VP, EOS rmlake@uh.edu	Reasonable workplace accommodations	ADA (Title I, II, and III); Section 504 of Rehabilitation Act of 1973; TX Commission on Human Rights Act
Accessibility			EIRA Coordinator accessibility@uh.edu	Accessibility for electronic and information resources	Section 508 of Rehabilitation Act of 1973; Section 255 of Telecommunications Act; ADA (Title III); TAC 213

Diversity and Affirmative Action	Equal Opportunity Services	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu	Rebecca Lake, Ass't VP, EOS rmlake@uh.edu	Discrimination in hiring/promoting practices; gender discrimination; age discrimination; hostile work environment; Title IX compliance	Age Discrimination Act; Exec Order 11246, VEVRAA, Section 503 (AA); Equal Pay Act; Title VI, VII, IX; Fair Housing Act; Pregnancy Discrim. Act; Older Workers Benefit Protection Act; Uniformed Services Employment and Reemployment Act
Emergency Management	Office of Emergency Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Ginger Walker, Dir. Emergency Mgmt gkwalker@uh.edu	Emergency preparedness planning; continuity of operations planning; emergency operations center	Texas Education Code (multi-hazard emergency operations plan); State Office of Risk Management Continuity Policy
Environmental Health & Safety	Environmental Health & Safety	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Lisa Benford, Dir. EHS  Ibenford@uh.edu  Chris McDonald, Dir., Fire & Life Safety cjmcdonald@uh.edu	Laboratory Safety program (research and instructional); Compliance committees' regulation of hazardous materials (biological, chemical and radiological); Disposal of hazardous materials; Occupational Safety program	NIH Office of Science Policies, TDSHS, EPA, RCRA, OSHA, CERCLA, Toxic Substance Control Act, Clean Air Act, Clean Water Act

Export Control	Division of Research	Claudia Neuhauser, Interim VP Research and Technology Transfer cmneuhauser@uh.edu  Dona Cornell, VP, General Counsel dhcornell@uh.edu	David Schultz, Ass't VP, Contracts and Grants dschultz@uh.edu	Deemed Export, Physical Travel, and/or Shipment of Equipment, Data, Technology, Biological/ Chemical Materials to Foreign Country/Person; I- 129 ECO Certification; Export License determination and/or application for new hire, researcher and students participating in online courses from sanctioned Countries; TCPs; CITI Training	CFR, EAR, ITAR, OFAC, NISPOM, NSDD-189
Facilities	Facilities/Construction Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: David Oliver, AVP Facilities/Construction Mgmt jdoliver@uh.edu	Facility Business Ops & Compliance: Magda Alanis, Exec. Dir. Facilities Business Ops & Compliance malanis4@central.uh.edu  Facility Services: Michael Oestereicher, Ass't VP, Facilities Services moestere@uh.edu  Facilities Construction: Nick Merry, Exec. Dir., FPC nlmerry@uh.edu  Facilities Planning: Christa Rieck, Exec. Dir., FPC, Planning Choward4@uh.edu	Contract processing and management, financial control management, business oversight (IT, customer service, communications, inventory)  Campus maintenance and operations; minor planned construction and repair projects management  Capital level construction management; UH System projects >\$1M  Project development, deferred maintenance fund distribution, BOR approval, THECB capital expenditure reporting; facilities inventory certification	TCEQ regs, Life Safety Code, THECB reporting and approval requirements; Tex. Education Code §61

Financial Aid	Office of Scholarships and Financial Aid	Robert McPherson, Interim Provost <u>bmcph@uh.edu</u> Briget Jans, Exec. Dir., Student Fin. Aid <u>bajans@uh.edu</u>	Salomon Medina, Asst. Dir., Fin. Aid Compliance sdmedina@uh.edu	Eligibility for Title IV funds; federal work study; federal and state awards and disbursements; reporting obligations	Title IV; THECB; Gainful Employment Regulations; HEOA; FERPA; Solomon Amendment; OMB Circular A-21; IRC; UPMIFA; Student Loan Default Prevention Initiative Act
Fire and Life Safety	Fire and Life Safety	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Chris McDonald, Director, Fire and Life Safety/Fire Marshal cjmcdonald@uh.edu	Response and investigation of fires on UH property; inspection of existing buildings and under construction for compliance with fire/life safety codes and standards; inspection of on-campus food establishments	NFPA 1, Fire Code; NFPA 101, Life Safety Code; State Fire Marshal Rules; Texas Food Establishment Rules
Governance	Office of General Counsel	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Transparency; conflicts of interest; Regent duties and responsibilities; governance; ethics	Open Meetings Act; Texas Government Code Title VI; Texas Education Code Ch. 111; SACS; BOR policies
Grant Administration	Division of Research	Claudia Neuhauser, Interim VP Research and Technology Transfer cmneuhauser@uh.edu	David Schultz, Ass't VP, Office of Contracts and Grants dschultz@uh.edu	Pre and Post Award Requirements; Financial Reporting; Regulatory Review; Effort Reporting	OMB Uniform Guidance; HEOA; HHS/NIH Regulations; Byrd Amendment; Texas Education Code
Human Resources	Human Resources	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Gaston Reinoso, AVP HR greinoso@uh.edu	Sandra Armstrong, Assoc. VP HR sgarmstrong@uh.edu	Employment benefits; FMLA; USERRA; wage/hour; personnel policies; recruiting/hiring; training; termination and early retirement; I-9 verification; grievances	FLSA; FMLA; FCRA, Drug- Free Workplace Act; FACTA; Immigration & Nationality Act; Labor Management Relations Act; OWBPA; USERRA

Immigration (Nonimmigrant Students and J Visa Exchange Visitors)	International Student and Scholar Services Office (ISSSO)	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Jin Zhang, Director ISSSO jinzhang@uh.edu	Visa status; eligibility for student employment; Foreign scholars and students; visiting artists and lecturers	Immigration & Nationality Act; SEVIS regs
Immigration (Faculty and Staff)	Office of General Counsel/Human Resources	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Casmin Hicks, Immigration Specialist cghicks@uh.edu  Valerie Coleman- Ferguson, Assoc. GC viferguson@uh.edu	Visa status; eligibility for employment	Immigration & Nationality Act
Intellectual Property & Technology Transfer	Office of Technology Transfer and Innovation	Claudia Neuhauser, Interim VP Research and Technology Transfer cmneuhauser@uh.edu	Chris Taylor, Exec. Dir., OTTI cstaylor5l@uh.edu	Research-related invention disclosures; technology licensing; commercialization and patents	Bayh-Dole Act; Tech Transfer Act; Dep't of Commerce regs; NIH guidelines
International Activities and Programs	Office of the Provost UH Global	Robert McPherson, Interim Provost bmcph@uh.edu	Andie Beer, Ass't Dir. Learning Abroad ambeer@uh.edu  Maggie Mahoney, Interim Dir., Learning Abroad memahoney@uh.edu	Fulbright Scholar Program, University Agreements, and Global Initiatives Study Abroad	Mutual Education and Cultural Exchange Act
Information Technology/Privacy & Security	UIT Security  Office of the General Counsel	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Dona Cornell, VP, General Counsel, Privacy Officer dhcornell@uh.edu  Unit Leader: Dennis Fouty, Assoc. VP IT dfouty@uh.edu	Mary Dickerson, Ass't VP, IT Security mdickerson@uh.edu	Privacy; identity theft; virus and hacking prevention	FISMA; FERPA; HIPAA; Texas Privacy Act; GDPR; Gramm Leach Bliley Act; Digital Millennium Copyright Act; No Electronic Theft Act; FACTA

Marketing and Communications	Marketing and Communications	Lisa Holdeman, VP <u>Ikholdeman@uh.edu</u>	Patrick Mulligan, Executive Director, Brand Management, Trademarks & Licensing pimullig@uh.edu	Trademarks management and Intellectual Property Use	U.S. Patent and Trademark Office (USPTO)
Mental Health	Counseling and Psychological Services	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Norma Ngo, Dir. Counseling & Psychological Services Nngo2@uh.edu	Mental health privacy and confidentiality	HIPAA; TX Mental Health Code; Occupations Code; Psychologists' Licensing Act
Purchasing/Procurement	Purchasing	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Karin Livingston, AVP for Finance klivingston@uh.edu	Robert Adkins, Director, Purchasing rsadkins@central.uh.edu	Contract administration; compliance state purchasing rules; procurement process	Texas Government Code; OMB Uniform Guidance; FAR, Anti-Kickback Act; Contracts Dispute Act; E- Sign Act; Davis-Bacon Act
Records	Office of the General Counsel	Dona Cornell, VP, General Counsel dhcornell@uh.edu		Record retention; litigation holds; response to Public Information Act requests; discovery requests	Texas Public Information Act; FERPA; HIPAA
Registrar	Office of the University Registrar	Robert McPherson, Interim Provost bmcph@uh.edu	Scott Sawyer, University Registrar shsawyer@central.uh.edu	The Family Educational Rights Act (FERPA or the Buckley Amendment) protecting a student's right to privacy concerning their academic records and information	20 U.S.C. 123g; 34 CFR Part 99
Research Animal Care and Use	Division of Research	Claudia Neuhauser, Interim VP Research and Technology Transfer cmneuhauser@uh.edu	David Brammer, Executive Director Animal Care Operations dwbrammer@uh.edu	The care and use of animals in biomedical research	Animal Welfare Act, National Institutes of Health Office of Laboratory Animal Welfare, United States Department of Agriculture, AAALAC International

Research Ethics/Compliance	Research Integrity & Oversight	Claudia Neuhauser, Interim VP Research and Technology Transfer cmneuhauser@uh.edu	Kirstin Holzschuh, Exec. Dir., Research Compliance kmrochford@uh.edu	Regulatory and ethical aspects of research involving:  Human Subjects Animal Research Research Conflict of Interest Research Misconduct Responsible Conduct of Research	DHHS; PHS; USDA; FDA; ORI; NIH/NSF; FERPA; HIPAA; AAALAC accreditation
Residential Life and Housing	Student Housing & Residential Life	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Don Yackley, AVP, SHRL dyackley@uh.edu	Reasonable accommodations; student allergies	ADA; OSHA; State and local regs; Clery Act

Risk Management	Risk Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu  Unit Leader: Louis Edwards, Treasurer rdpuryea@uh.edu	Wayne Brown, Dir., Risk Management <u>lwedwards2@uh.edu</u>	Property and liability insurance; workers compensation; drones	Insurance claims; TX Workers' Compensation Act
Sexual Violence and Sexual Harassment	Equal Opportunity Services	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@central.uh.edu	Rebecca Lake, Ass't VP, EOS rmlake@uh.edu	Sexual misconduct	Title IX; Violence Against Women Act; Campus Sex Crimes Prevention Act, FERPA; Texas Ed Code
Student Affairs	Dean of Students	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Donell Young, Dean of Students dlyoung4@uh.edu	Student organizations; student discipline; residential life; ADA/504 in housing and educational programs	ADA/Rehabilitation Act of 1973; FERPA; HEOA; Title IX; Texas Ed Code
Student Health Services	Health Center	Daniel Maxwell, VP Student Affairs dmmaxwel@uh.edu	Jon Rusciano, MD, Interim Exec. Dir. Student Health Center jrusciano@uh.edu	Health care privacy	HIPAA, HITECH and FERPA
Support Organizations	Office of University Advancement	Eloise Brice, VP University Advancement edstuhr@uh.edu	Ben Spofford, Chief of Staff to VP Univ. Advancement bjspofford@uh.edu	MOUs, expenses, internal controls, gift receipting	
Trademark Management	Marketing and Communications	Lisa Holdeman, VP, Marketing and Communications <u>lkholdeman@uh.edu</u>	Patrick Mulligan, Director Brand Management, Trademarks and Licensing pimulligan@uh.edu  Mark Yzaguirre, Assoc. VC/VP Legal Affairs & Assoc. GC myzaguirre@uh.edu	The legal protection, management, and enforcement of the rights in the Marks of the Board, the System and the component universities	SAM 01.D.03 – Trademark Management