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 Office of Compliance and Ethics.

The **Responsible Person** is the accountable senior 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 Dept/Division/ Office	Responsible Person	Functionally Responsible Contact	Representative Issues	Representative Laws and Guidance
Academic Programs	Office of the Provost	Diane Chase, Provost dzchase@uh.edu	Jim Briggs, Assoc. Provost, Faculty Development/Affairs jbriggs@uh.edu Bradley Eanes, Interim Assoc. Provost, Finance & Administration bteanes@uh.edu College Deans	 Academic fee mgmt. Academic integrity & standards Budgets/Equity balances Faculty appointments, reappointments, promotions & tenure Faculty performance and post-tenure review Financial accountability Financial value transparency Gainful employment Privacy of student education records 	 Title VI, VII, IX of Civil Rights Act FERPA Financial Value Transparency/ Gainful employment Regs. HEOA Texas Educ. Code Faculty Handbook SAM 03.G.01, 06.A.09 MAPP 11.03.01, 12.05.01
Accounting/ Fiscal Management	Finance – Accounts Payable, HUB,	Raymond Bartlett, Sr. VP, Administration and Finance	Usha Mathew, Ass't VP, Finance/Controller ujmathew@uh.edu	AccountingFinancial reportingInternal controls	 General Appropriations Act Red Flag Rules
	Payroll & Tax Department,	rbartlett@uh.edu		 Payment for expenditures 	Tax CodeTexas Educ. Code

	Financial Reporting and Accounting Services	Unit Leader: Karin Livingston AVP for Finance klivingston@uh.edu		Property inventoryTravel	
Accreditation	Office of the Provost	Diane Chase, Provost dzchase@uh.edu	Joseph Curtin, Assoc. Provost, Inst. Research jcurtin2@uh.edu	 University accreditation (SACS) UH Quality Enhancement Plan (QEP)	 HEOA, SARA, SACS and Programmatic Accreditations THECB reporting
Admissions	Office of the Provost	Diane Chase, Provost dzchase@uh.edu	Mardell Maxwell, Exec. Dir. of Admissions mrmaxwell@uh.edu	Non-discriminationPrivacy of student education records	FERPA Texas Educ. Code
Advancement	Advancement and Alumni	Eloise Brice, VP Advancement and Alumni edbrice@uh.edu	Kristin Burch Senior Ass't VP, Advancement & Alumni Engagement ktburch@uh.edu	 Donor instructions IRS rules on gifts/endowments State regs on solicitation and confidentiality of donor identity 	 CAN-SPAM Act Gift terms IRS regulations Philanthropy Act of 1995 State registration requirements
Assets, Endowment, Banking	Office of the Treasurer	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Karin Livingston AVP for Finance klivingston@uh.edu	Louis Edwards, Treasurer lwedwards2@uh.edu	 Endowment spending Fiduciary obligations Public finance 	 GLBA IRS regulations SEC regulations State and federal banking regulations UPMIFA
Athletics	Athletics	Raymond Bartlett, Interim VP, Intercollegiate Athletics rbartlett@uh.edu	Lauren DuBois, Sr. Assoc. Athletic Director ledubois@uh.edu	 Gender equality (reporting and compliance) Minors, protection of Name, image, likeness NCAA compliance Recruiting Records; Consent and release forms 	 Equity in Athletics Disclosure Act FERPA NCAA regulations Texas Educ. Code Title IX

Campus Safety and Security	<u>UHPD</u>	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Ceaser Moore, Chief of Police cmoore5@uh.edu	Lori Percle, Manager, UHPD Compliance lapercle@uh.edu	 Campus carry enforcement Campus SaVE Act reporting Clery Act reporting Drone operation Emergency planning Law enforcement VAWA compliance and reporting 	 Campus Carry law Campus SaVE Act Campus Sexual Assault Victim Bill of Rights Campus Sex Crimes Prevention Act Clery Act Title IX VAWA
Compliance and Ethics	Office of Compliance and Ethics	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Sergio V. Leal, Chief Compliance Officer svleal@uh.edu	Compliance issues Compliance training Ethical culture	 BOR Code of Ethics Federal Acquisition Regulation (FAR) Federal Sentencing Guidelines for Orgs. Federal Ethics statutes OMB Uniform Guidance Texas Gov't Code Texas Penal Code
Contract Administration	Office of Contract Administration Office of General Counsel	Dona Cornell, VP, General Counsel dhcornell@uh.edu	Contracts: Mark Yzaguirre, Assoc. VP & Assoc. GC Contracts Administration myzaguirre@uh.edu contractadmin@uh.edu Real Estate & Construction Contracts: recc@central.uh.edu	Contract administration Compliance with relevant state contracting laws	Texas Educ. Code Texas Gov't Code

Copyright	University Information Technology	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Dona Cornell, VP, General Counsel dhcornell@uh.edu Unit Leader: Dennis Fouty, Senior Assoc. VP, CIO IT dfouty@uh.edu	Sven Hahues, Ass't VP, IT Security shahues@uh.edu	 Course materials Fair Use Licensing Music downloads Peer to peer file sharing University logos 	 Bayh-Dole Act Copyright Act Copyright Term Extension Act CREATE Act Digital Millennium HEOA Lanham Act TEACH Act Trademark Revision Act Visual Arts Rights Act
Discrimination; Affirmative Action (limited to employee recruitment)	Equal Opportunity Services Office of General Counsel	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Dona Cornell, VP, General Counsel dhcornell@uh.edu	Rebecca Lake, Ass't VP, EOS rmlake@uh.edu Dona Cornell, VP, General Counsel dhcornell@uh.edu (DEI compliance)	 AAP federal compliance Accessibility Age discrimination Sex (including gender and pregnancy) discrimination Hiring/promotion discrimination Hostile work environment Reasonable accommodations Title IX compliance 	Age Discrimination Act; ADA; Exec Order 11246, VEVRAA, Section 503/504; Equal Pay Act; Title VI, VII, IX; Fair Housing Act; Pregnancy Discrim. Act; Pregnancy Workers Fairness Act; PUMP Act; Older Workers Benefit Protection Act; Uniformed Svcs Employment and Reemployment Act; Texas Educ. Code §51.982 (pregnant students)
Emergency Management	Office of Emergency Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Ginger Walker, Dir. Emergency Mgmt. gkwalker@uh.edu	 Continuity of operations planning Emergency operations center Emergency preparedness planning 	 State Office of Risk Management Continuity Policy Texas Educ. Code (multi-hazard emergency operations plan)

Environmental Health & Safety	Environmental Health & Safety	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Lisa Benford, Dir. EHS Ibenford@uh.edu Chris McDonald, Exec. Dir., Fire & Life Safety/Fire Marshal cjmcdonald@uh.edu	 Compliance committees' regulation of hazardous materials (biological, chemical and radiological) Disposal of hazardous materials Laboratory Safety program (research and instructional) Occupational Safety program 	 Clean Air Act Clean Water Act NIH Office of Science Policies TDSHS, EPA, RCRA, OSHA, CERCLA Toxic Substance Control Act
Export Control	Office of Compliance and Ethics	Dona Cornell, VP, General Counsel dhcornell@uh.edu David Schultz, Ass't VP, Contracts and Grants dschultz@uh.edu Sergio V. Leal, Chief Compliance Officer svleal@uh.edu	Angelica Grado-Wright, Export Control Officer amgrado- wright@uh.edu	 Deemed export assessments Drone procurement Export awareness training Export Licenses International shipments International travel I-129 ECO Certification Restricted Party Screening (RPS) Technology Control Plans 	CFR, EAR, ITAR, OFAC, NISPOM, NSDD-189

Facilities	Facilities/Constru	Raymond Bartlett, Sr.	Facilities Business Ops	Compliance, contract	
	ction	VP, Administration	& Compliance:	processing and	
	Management	and Finance	Magda Brady, Ass't VP	management, financial	
		rbartlett@uh.edu	Facilities Business Ops	control management,	
			& Compliance	business oversight (IT,	
			malanis6@uh.edu	customer service,	
		Unit Leader: David		communications,	
		Oliver, Senior AVP	Facilities Services:	inventory)	
		Facilities/Construction	Michael Oestereicher,		Life Safety Code
		Mgmt.	Ass't VP, Facilities	Campus maintenance and	• TCEQ regs
		jdoliver@uh.edu	Services	operations; minor planned	• Texas Educ. Code §61
			moestereicher@uh.edu	construction and repair	THECB reporting and
				projects management	approval requirements
			Facilities Construction:		
			Nick Merry, Ass't VP	Capital level construction	
			Capital Project Mgmt.	management; UH System	
			nlmerry@uh.edu	projects >\$1M	
				Project development,	
			Facilities Planning:	deferred maintenance	
			Christa Rieck, Ass't VP	fund distribution, BOR	
			Facilities Planning	approval, THECB capital	
			choward4@uh.edu	expenditure reporting;	
				facilities inventory	
			Facilities Partnerships	certification	
			& Engagement:		
			Jennifer Rea, Exec. Dir.	BOR approval processing	
			Facilities Partnerships	for Facilities related	
			jdrea2@uh.edu	agenda items, policy	
				review for Facilities	
				department	

Financial Aid	Office of Scholarships and Financial Aid	Diane Chase, Provost dzchase@UH.EDU Ben Montecillo, Exec. Dir., Student Fin. Aid bmontecillo@uh.edu	Reginald Brazzle, Dir., Student Fin. Aid rbrazzle@uh.edu Ben Montecillo, Exec. Dir., Student Fin. Aid bmontecillo@uh.edu	 Federal (Title IV), State, and Institutional financial aid (eligibility, disbursement, etc.) Reporting 	 False Claims Act Federal (Title IV), State, and Institutional financial aid (eligibility, disbursement, etc.) FERPA Internal Revenue Code (IRC) Office of Mgmt. and Budget (OMB) and 2 Code of Federal Regulations (CFR) Solomon Amendment Texas Admin. Code (TAC), Texas Educ. Code (TEC), and THECB program rules Uniform Prudent Management of Institutional Funds Act (UPMIFA)
Fire and Life Safety	Fire and Life Safety	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Kelly Boysen, Ass't VP, Campus Safety krboysen@uh.edu	Chris McDonald, Exec. Dir., Fire and Life Safety/Fire Marshal cjmcdonald@uh.edu	 Inspection of buildings (existing and under construction) for compliance with fire/life safety codes and standards Inspection of on-campus food establishments Response to and investigation of fires on UH property 	 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	 Conflicts of interest Ethics Governance Regent duties and responsibilities Transparency 	 BOR policies Open Meetings Act SACS Texas Gov't Code Texas Educ. Code Ch. 111 Title VI
Grant Administration	Division of Research	Claudia Neuhauser, Interim VP Research cmneuhauser@uh.edu	David Schultz, Ass't VP, Office of Contracts and Grants dschultz@uh.edu	 Effort Reporting Financial management and reporting Pre and Post Award Requirements Regulatory Review Research agreements (monetary and nonmonetary) Subaward issuance and monitoring 	 Bayh-Dole Act Byrd Amendment FARs/DFARs Higher Educ. Act §117 HEOA; HHS/NIH Regulations Improper Payment Act NSPM-33 Office of Mgmt. & Budget (OMB) Single Audit Act Texas Educ. Code Uniform Guidance
Healthcare	Office of Compliance and Ethics Office of General Counsel	Sergio V. Leal, Chief Compliance Officer svleal@uh.edu Dona Cornell, VP, General Counsel dhcornell@uh.edu	Amberley Ross, Healthcare Compliance Officer ahross2@uh.edu	 AAAHC accreditation Healthcare clinics under SAM 06.A.12 (comprehensive primary care, mental health/behavioral, and specialty clinics) Healthcare fraud/abuse Healthcare privacy Medicare/Medicaid billing 	 AAAHC Affordable Care Act Anti-Kickback Act FERPA HIPAA HITECH Texas Medical Records Privacy Act TX Mental Health Code Texas Occupations Code Texas Psychologists' Licensing Act 21st Century Cures Act SAM 06.A.12

Human Resources	Human Resources	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Gaston Reinoso, AVP HR greinoso@uh.edu	Sandra Armstrong, Assoc. VP HR sgarmstrong@uh.edu	 Employment benefits FMLA Grievances I-9 verification Personnel policies Recruiting/hiring Termination and early retirement Training USERRA; Wage/hour 	 Drug-Free Workplace Act FACTA; FLSA; FMLA; FCRA Immigration & Nationality Act Labor Management Relations Act OWBPA USERRA
Immigration (Nonimmigrant Students and J Visa Exchange Visitors)	International Student and Scholar Services Office (ISSSO)	Paul Kittle, VP Student Affairs prkittle@uh.edu	Stefan Johnsson, Assoc. Director ISSSO sjohnsson@uh.edu	 Eligibility for student employment Foreign scholars and students Visa status Visiting artists and lecturers 	Immigration & Nationality ActSEVIS 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	 Eligibility for employment Visa status	Immigration & Nationality Act
Intellectual Property & Technology Transfer	Office of Technology Transfer and Innovation	Ramanan Krishnamoorti, VP Energy & Innovation ramanan@uh.edu	Rick James, Dir., Tech Commercialization rfjames@uh.edu	 Commercialization and patents Research-related invention disclosures Technology licensing 	Bayh-Dole ActDep't of Commerce regsNIH guidelinesTech Transfer Act

International Activities and Programs	Office of the Provost Institute for Global Engagement	Diane Chase, Provost dzchase@UH.EDU Unit Leader: Michael Pelletier, Exec. Dir. Institute for Global Engagement mppelletier@uh.edu	Andie Beer, Assoc. Dir. Learning Abroad ambeer@uh.edu Maggie Mahoney, Dir. Global Engagement memahoney@uh.edu	 Fulbright Scholar Program Study Abroad University Agreements and Global Initiatives 	Mutual Education and Cultural Exchange Act
Information Technology/ Privacy & Security	Office of Compliance & Ethics	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Sergio V. Leal, Chief Privacy Officer svleal@uh.edu Unit Leader: Dennis Fouty, Senior Assoc. VP, CIO, IT dfouty@uh.edu	Sven Hahues, Ass't VP, IT Security shahues@uh.edu	 Classified/Controlled Unclassified Information Identity theft Privacy Virus and hacking prevention 	 Digital Millennium Copyright Act FACTA; FISMA; FERPA GDPR Gramm Leach Bliley Act HIPAA NIST 800-171 No Electronic Theft Act Texas Privacy Act
Marketing and Communications	Marketing and Communications	Lisa Holdeman, VP lkholdeman@uh.edu	Patrick Mulligan, Exec. Dir., Brand Mgmt., Licensing & Trademarks pjmulligan@uh.edu	Intellectual Property UseTrademarks management	U.S. Patent and Trademark Office (USPTO)
Purchasing/ Procurement	Purchasing	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Karin Livingston, AVP for Finance klivingston@uh.edu	Robert Adkins, Director, Purchasing rsadkins@uh.edu	 Procurement process Purchasing rules 	 Anti-Kickback Act Contracts Dispute Act E-Sign Act FAR OMB Uniform Guidance Texas Educ. Code Texas Gov't Code BOR 55.01 SAM 02.A.29 on Ethics

Records	Office of General Counsel	Dona Cornell, VP, General Counsel dhcornell@uh.edu		Discovery requestsLitigation holdsPublic Information Act requestsRecord retention	• FERPA • HIPAA • Texas Public Information Act
Records, Academic	Office of the University Registrar	Diane Chase, Provost dzchase@UH.EDU	Scott Sawyer, University Registrar ssawyer@uh.edu	Privacy of student education records	FERPA
Research Animal Care and Use	Division of Research	Claudia Neuhauser, Interim VP Research cmneuhauser@uh.edu	David Brammer, Exec. Dir., Animal Care Operations dwbrammer@uh.edu	The care and use of animals in biomedical research	 AAALAC International Animal Welfare Act NIH Office of Laboratory Animal Welfare U.S. Dep't of Agriculture
Research Ethics/ Compliance	Research Integrity & Oversight	Claudia Neuhauser, Interim VP Research cmneuhauser@uh.edu	Jamie Peno, Exec. Dir., Research Compliance jepeno@uh.edu	 Animal Research CITI training Human Subjects Research Conflict of Interest Research Misconduct Responsible Conduct of Research 	 AAALAC accreditation DHHS; FDA FERPA HIPAA NIH/NSF/PHS ORI USDA

Research Security	Division of Research	Claudia Neuhauser, Interim VP Research cmneuhauser@uh.edu	Claudia Neuhauser, Research Security Officer cmneuhauser@uh.edu Angelica Grado-Wright, Export Control Officer amgrado- wright@uh.edu	 Classified/Controlled Unclassified Information Export control Foreign influence reporting Malign Foreign Talent Recruitment Programs NSPM-33 International research collaborations, business development initiatives, and inter-institutional agreements Visa Candidate Affiliation Restricted Party Screening 	• BOR 42.03 • CHIPs & Science Act • NSPM-33 • Texas Edu. Code §51.956
Residential Life and Housing	Student Housing & Residential Life	Paul Kittle, VP Student Affairs prkittle@uh.edu	Don Yackley, AVP, SHRL dyackley@uh.edu	Student housing reasonable accommodations	ADA State and local regs
Risk Management	Risk Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: Louis Edwards, Treasurer lwedwards2@uh.edu	Wayne Brown, Dir., Risk Management wwbrown@uh.edu	 Property and liability insurance Workers compensation 	Insurance claims Texas Workers' Compensation Act
Sexual Violence and Sexual Harassment	Equal Opportunity Services	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu	Rebecca Lake, Ass't VP, EOS rmlake@uh.edu	Sexual misconduct	Campus Sex CrimesPrevention ActFERPA; Texas Educ. CodeTitle IX; VAWA

Student Affairs	Dean of Students	Paul Kittle, VP Student Affairs prkittle@uh.edu	Donell Young, Dean of Students dlyoung3@uh.edu	 ADA/504 Minors, Protection of Residential life Student discipline Student organizations 	 ADA/Rehabilitation Act of 1973 FERPA; HEOA Texas Educ. Code Title IX
Support Organizations	Advancement and Alumni	Eloise Brice, VP Advancement and Alumni edbrice@uh.edu	Ben Spofford, Chief of Staff to Advancement and Alumni bjspofford@uh.edu	ExpensesGift receiptingInternal controlsMOUs	SAM 08.A.02 – Private Support Organizations and Foundations
Trademark Management	Marketing and Communications	Lisa Holdeman, VP, Marketing and Communications <u>Ikholdeman@uh.edu</u>	Patrick Mulligan, Exec. Dir., Brand Mgmt., Licensing & Trademark pjmulligan@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 System universities	SAM 01.D.03 – Trademark Management