

College and University Compliance Programs:
Obligations, Organization and Implementation
NACUA conference November 11, 2009
Materials of Craig W. Parker
The Catholic University of America

- I. What are the Federal regulatory compliance Obligations?
 - a. Got a few minutes? See Fedlaw List – Attachment C
 - b. More than 200 federal laws applicable to higher ed, <http://counsel.cua.edu>
 - c. Bad news: With no single source in the country providing complete information...more than 200 federal statutes impose a stunning and complex burden on institutions. See *CLIC Archived What's New*
 - d. Good news: At the same time, these are important human values that are protected – privacy, freedom, opportunity and safety. Compliance is a principle guarantee that these values will flourish on our campuses. A culture of compliance is necessary to preserve these core values that underlie federal regulations.
 - e. The Federal Sentencing Guidelines framework
 - f. A few examples of some of the legal mandates – “action verbs”
 - i. Easy ones? Beck Notices; EEO regulations
 - ii. Hard ones? Information Security; Trade Regulation

- II. Organization and Implementation at The Catholic University of America - Overview of “Compliance Partners” program at a small university
 - a. Description of Compliance Partners – See Attachment A
 - i. Program is an outgrowth of preventive law program of OGC
 1. elements of CUA preventive law program
 2. OGC responsible for CUA Policy Committee
 3. OGC responsible for Information Assurance Committee
 - ii. Oversight by General Counsel (OGC), no full-time staffing
 - iii. Informal, web-based
 1. Federal Sentencing *Guidelines* allow “something less...”
 2. Program elements under *Guidelines*
 3. Web is transparent, real-time, accessible
 - iv. The structure of CUA Compliance Partners web pages as of today
 1. See Attachment B
 2. Working with HR toward including Compliance Partner duties in new hire position descriptions, introduction to OGC, customized training and performance evaluation
 - b. Board and CEO leadership
 - i. General Counsel reports to President and Board of Trustees
 1. reports compliance to Audit Committee
 - ii. Fraud Telephone Hotline reported to Audit Committee
 - iii. OGC works closely with VP's on Compliance Partners
 - c. Risk Identification
 - i. Risk Management function not full-time at CUA

1. Environmental Health and Safety within Facilities area
 - ii. Relationship of Compliance Partners to ERM
 1. Note *“The State of Risk Management at Colleges and Universities Today,”* 2009 Association of Governing Boards and United Educators Insurance report
 2. overlap between federal regulatory requirements and *Worksheet for Oversight of Systematic Risk Assessment* from *AGB – UE Report*
 3. CUA looking at integration of ERM and Compliance
 - d. Incorporating Ethics programmatically
 - i. CUA Philosophy on Human Resources Management
 - ii. Code of Conduct for Faculty and Staff : Post-SOX policy
 1. incorporates Faculty Handbook, Financial Policies
- III. A few examples of compliance aides from CUA website – Attachment D
- a. Red Flag action report form
 - i. <http://counsel.cua.edu/glb/resources/redflag.dot>
 - b. Non-discrimination chart on EO
 - i. <http://counsel.cua.edu/Employment/resources/eeotable.cfm>
 - c. FERPA Q & A
 - i. <http://counsel.cua.edu/ferpa/questions/>.
 - d. Immigration – “Employment Based Non-Immigrant Classification”
 - i. <http://counsel.cua.edu/fedlaw/ImmClass.cfm>
 - e. Updated Title IV HEOA Consumer Disclosure list – T.IV & T.IX
 - i. <http://counsel.cua.edu/StudLife/publications/consumerinfo.cfm>

The Catholic University of America, web-based "Compliance Partners" Program

Introduction. The Catholic University of America (CUA) has developed a web-based preventive law compliance program, using existing university resources, that enhances employee productivity, improves service delivery of legal information, improves legal compliance and reduces risk. Compliance Partners offers a de-centralized (and thus lower cost) approach to the problem for smaller schools of how to track, understand and comply with the growing mountain of federal regulations that govern higher education. With no single source in the country providing complete information on compliance rules in higher education, more than 200 federal statutes impose a stunning and complex burden on institutions.

Schools need some kind of legal compliance program. Key guidance on whether a program that is structured as something less than a separate compliance office (such as a web-based de-centralized program) should be considered adequate is found in the Federal Sentencing Guidelines. Most larger schools and all research institutions seek compliance with these Guidelines. The Guidelines, which recommend sanctions for universities and their corporate officers convicted under federal criminal law for violation of rules governing administration of contracts, federal funding, etc., permit substantially reduced penalties for organizations that maintain "an effective corporate compliance program."

The elements of such a program are: implementing policies; designating a compliance officer and committee; conducting effective training; developing effective communication; internal monitoring and auditing; well-publicized disciplinary guidelines; and prompt response and correction for detected problems. The Guidelines note, "...a small organization may meet the requirements of this Guideline with less formality and fewer resources than would be expected of large organizations...reliance on existing resources and simple systems can demonstrate [the appropriate] degree of commitment...(E)xamples of the informality and use of fewer resources with which a small organization may meet the requirements of this Guideline include...using available personnel, rather than employing separate staff..."

Description. Central to the vision for a preventive law compliance program at CUA was (1) designating someone as the leader of the compliance effort, (2) using existing resources on campus, inspiring people to become Compliance Partners, (3) creation of a transparent, ongoing web-based information system readily available to each individual Compliance Partner, (4) identification of all compliance requirements in federal laws applicable to higher education, (5) breaking down generalized

institutional obligations spelled out in federal law and regulations into their component parts, each to be assigned to a designated employee responsible for compliance in that case, (6) doing so in terms useful for non-lawyer managers, (7) tying policy development and enforcement to the compliance process and (8) collection of compliance aids to help those Compliance Partners meet their responsibilities.

In 2002, CUA's Office of General Counsel (OGC) created the Campus Legal Information Clearinghouse website (CLIC) in collaboration with the American Council on Education, located on the web at <http://counsel.cua.edu> and freely available to the entire higher education community. The website identifies all significant federal laws applicable to higher education institutions; on separate pages for each law it develops information about that law, explaining the details of regulations; includes selected court decisions relevant to that law; and assists users with compliance through compliance materials collected from other institutions, law firms, government agencies and non-profit organizations.

In 2008, OGC developed a related website called Compliance Partners at <http://compliance.cua.edu>. Each CUA employee responsible for compliance with some aspect of a federal law has a page on this site unique to his/her position. That employee's page identifies all of that employee's individual compliance responsibilities (with material drawn from the CLIC pages) under any federal law or regulation assigned to that position. Employees are encouraged to "own" their page. Each page includes links to the CLIC page applicable to that law as well as to other resources that will help the employee with his/her compliance responsibilities.

Links go in the other direction as well: anyone, employee, student or other, who uses the CLIC page to look up a particular federal law or regulation will easily find clearly labeled Compliance Partner links to every person on campus who has some specific compliance responsibility under that law. For example, looking up the CLIC page on the Campus Security Act links to six different Compliance Partners on campus with responsibility for some area of compliance with the Act; under the Americans with Disabilities Act, there are links to five different Compliance Partners for the ADA.

A third web site that supports Compliance Partners is the university's policy page at <http://policies.cua.edu>. Among other things, each policy identifies a "Responsible Official," the person responsible for maintaining that policy. For policies related to federal law, that policy links back to the

CLIC page on that law and will also link to the Compliance Partners page for that official. Similarly, the page for each Compliance Partner links to any policies for which that person is the Responsible Official.

Innovations. The project is unique in American higher education in weaving together a school's federal compliance obligations, legally required policies and individual position descriptions in a transparent, regularly updated, web-based, freely available compliance system. This has allowed us to pull together, at the "virtual" level, a variety of campus offices around the issue of compliance, including campus security, equal opportunity, human resources, research, immigration, information technology, controller, environmental safety, financial aid, registrar, disability services and others.

Impacts. We find there is a heightened awareness towards legal compliance in the interactions of these offices with each other, even without legal counsel being directly involved. There is also a benefit to the legal staff from regular extensive contact with non-lawyer experts in their particular disciplines, such as OSHA, ADA, immigration, campus security and research administration.

While there is no easy formula to measure compliance programs, in the first phase of our program we experienced substantially reduced complaints in internal university proceedings and in external courts and government agencies. We have reduced negative experiences with external compliance audits and inspections. We have improved our insurance claims experience and substantially reduced our insurance premiums compared with peer institutions. Compliance Partners has made supervisors more aware of the importance of compliance in evaluating employee performance. It has also sharpened the focus of internal audits and improved our ability to work with external auditors and risk management consultants.

Resources. CUA has expended considerable resources initially developing these websites, but makes them freely available to any institution to use as they wish, with appropriate attribution to CUA and disclaimers noted on the pages. We spend about \$55,000 per year, including student help, to keep these websites up to date. That's probably a good estimate of what it would cost to create a similar set of websites at another school, using CUA's content but adjusting it to fit the unique needs, positions and programs of another institution.

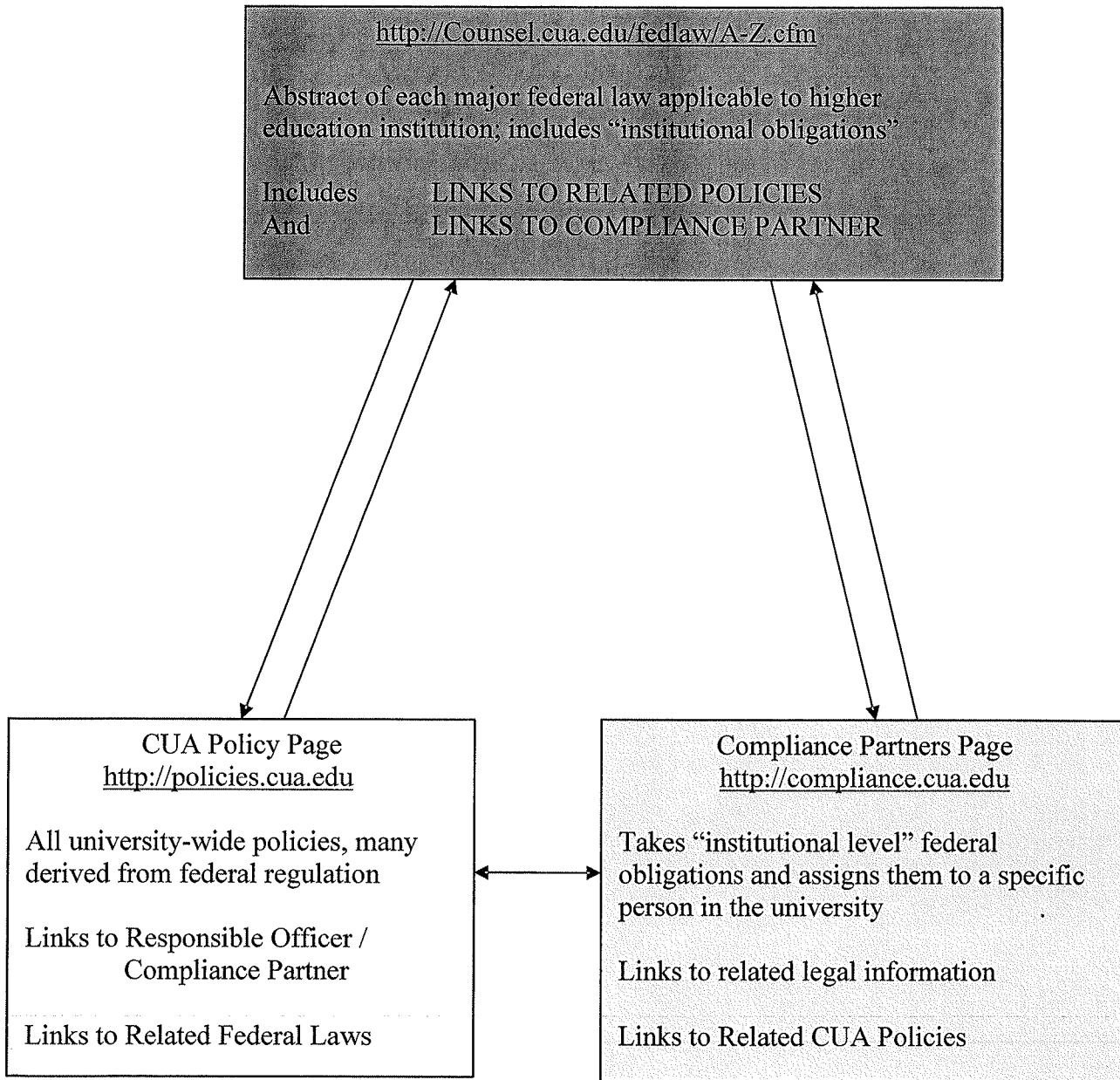
Regulations protect important human values such as privacy, freedom, opportunity and safety. Compliance is the principal and best guarantee that these values will flourish on our campuses and we believe a "culture of compliance" is needed to preserve these core values underlying federal regulations.

The Catholic University of America

Office of General Counsel

Compliance Partners Program – Structure of Linked Webpages

November 2009



Summary of Federal Laws

A - Z (Index of Laws and Topics)

The Catholic University of America, <http://counsel.cua.edu/fedlaw/A-Z.cfm>

November 11, 2009

A / B / C / D / E / F / G / H / I / J / K / L / M / N / O / P / Q / R / S / T / U / V /
W / X / Y / Z

A:

Age Discrimination Act of 1975 (Students)

Age Discrimination in Employment Act of 1967 (ADEA) (part of the Fair Labor Standards Act of 1938)

American Jobs Creation Act of 2004

Americans with Disabilities Act of 1990 (ADA) (Employment)

Americans with Disabilities Act of 1990 (ADA) (Students)

Animal Welfare Act

Anti-Kickback Act of 1986

Anti-terrorist Financing Guidelines: U.S. Department of the Treasury: Voluntary Best Practices for Charities

Antitrust Act of 1890, Sherman; see also Clayton Act (amended by the Robinson Patman Act)

Artists Rights Act, Visual

Athletically Related Student Aid (Reporting Requirements)

Atomic Energy Act

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B:

Bankruptcy Reform Act of 1978 and 1990 Amendments

Bayh-Dole Act of 1980 (Patent Rights in Inventions Made with Federal Assistance)

Biological Products, Public Health Service Laws on Quarantine, Inspection and Licensing of

Bioterrorism (Public Health Security and Bioterrorism Preparedness and Response Act of 2002)

Bond Financed Facilities: Use of

Buckley Amendment -- see Family Educational Rights and Privacy Act of 1974 (FERPA)

Byrd Amendment (Lobbying)

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C:

Cafeteria Plans (Tax)

Campus Security Act of 1990

Campus Sex Crimes Prevention Act

Campus Sexual Assault Victim Bill of Rights (amends the Campus Security Act of 1990)

CAN-SPAM Act (Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003)

Certification of Principals for Federal Funding

Charitable Contributions, Donee Responsibilities with Respect to (Tax)

Charitable Gift Annuity Antitrust Relief Act of 1995

Charitable Solicitations, State Laws Regulating

Chemical Facilities, Security of High Risk

Civil Rights Act of 1866 (Employment)

Civil Rights Act of 1866 (Students)

Civil Rights Act of 1964 (Title VI and Title VII) (Employment)

Civil Rights Act of 1964, Title VI (Students)

Civil Rights Act of 1991 (amends Title VII)

Civil Rights Attorney's Fees Awards Act of 1976

Civil Rights Restoration Act of 1987

Civil Rights Tax Relief Act of 2004

Clayton Act (amended by the Robinson Patman Act)

Clean Air Act

Clean Water Act

Clergy Housing Allowance Clarification Act

COBRA, Health Care Continuation Coverage Requirements (amended by the Health Insurance Portability and Accountability Act of 1996 (HIPAA))

Communications Act of 1934 (amended by the Telecommunications Act of 1996)

Communications Privacy Act of 1986, Electronic (ECPA)

Community Improvement Volunteers Act of 1994

Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) (amended by the Superfund Amendments and Reauthorization Act (SARA))

Computer Law -- see Miscellaneous Laws (Useful Sites for Higher Education)

Confidentiality of Patient Records

Conflict of Interest Policy as *required* by IRS

Controlled Substances Act

Constitution Day (Consolidated Appropriations Act of 2005)

Contract Work Hours and Labor Standards Act

Controlled Substance Act of 1970

Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN SPAM Act)

Cooperative Research and Technology Enhancement Act of 2004 (CREATE Act)

Copeland Anti-Kickback Act

Copyright -- see Miscellaneous Laws Affecting Universities

Copyright Act of 1998, Digital Millennium

Copyright Law (1976), General Revision of the; and Judicial Improvement Act of 1990

Copyright Term Extension Act of 1998, Sonny Bono

Credit -- See Fair Credit Reporting Act

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D:

Davis Bacon Act (Government Contracts)

Debt Structure (Tax)
Digital Millennium Copyright Act of 1998
Direct Loan Program, Wm. D. Ford Federal
Discrimination
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Drug-Free Schools and Communities Act Amendments of 1989 (amends the
Higher Education Act)
Drug-Free Work Place Act of 1988

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E:

Education Amendments of 1972, Title IX (Employment)
Education Amendments of 1972, Title IX (Students)
Education Amendments of 1976 -- see Higher Education Act of 1965, Education
Amendments of 1976, Higher Education Amendments of 1992, and 1998, Title IV
Electronic Communications Privacy Act of 1986 (ECPA)
Electronic Fund Transfers, Regulation E
Electronic Signatures in Global and National Commerce Act
Emergency Planning and Community Right-to-Know Act (EPCRA)
Employee Polygraph Protection Act of 1988
Employee Retirement and Income Security Act (ERISA)
Equal Employment Opportunity -- see Employment
Employment
Employment Based Non -Immigrant Classifications
Employment Eligibility, Verification of
Environmental Laws
Equal Pay Act of 1963 (part of the Fair Labor Standards Act of 1938)
Equity in Athletics Disclosure Act of 1994
Ethics in Government Act of 1978 (amended by the Ethics Reform Act of 1989)
Executive Orders 11246 and 11375 (Equal Employment Opportunity)
Export Administration Act (EAA) and the Arms Export Control Act (AECA)

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F:

FACT ACT (Fair and Accurate Credit Transactions Act)
Fair Credit Reporting Act (FCRA) (amended by the Consumer Credit Reporting
Reform Act of 1996)
Fair Housing Act Amendments of 1988
Fair Labor Standards Act of 1938 (FLSA)
False Claims Act (sometimes called The Whistleblower Law)
Family and Medical Leave Act of 1993 (FMLA)
Family Education Loan Program, Federal
Family Educational Rights and Privacy Act of 1974 (FERPA) (also known as the
Buckley Amendment)

Federal Acquisition Regulation (FAR)
Federal Acquisition Streamlining Act of 1994 (FASA)
Federal Depository Library Program
Federal Direct Loan Program, Wm. D. Ford
Federal Family Education Loan Program
Federal Food, Drug and Cosmetic Act
Federal Insecticide, Fungicide, and Rodenticide Act
Federal Insurance Contributions Act (FICA)
Federal Pell Grant Program
Federal Perkins Loan Program
Federal PLUS Loan Program
Federal Policy on Recombinant DNA
Federal Property and Administrative Services Act of 1949
Federal Rules of Civil Procedure Related to Discovery and Electronically Stored Information
Federal Sentencing Guidelines for Organizations; Revised
Federal Stafford Loan
Federal Supplemental Educational Opportunity Grant
Federal Tax Law (Students)
Federal Trade Commission Act
Federal Unemployment Tax Act (FUTA)
Federal Unsubsidized Stafford Loan
Federal Volunteer Protection Act
Federal Work-Study Program
FERPA -- see Family Educational Rights and Privacy Act of 1974 (also known as the Buckley Amendment)
Financial Aid Programs
Financial Services Modernization Act (The Gramm-Leach-Bliley Act)
Financing Guidelines, Antiterrorist : U.S. Department of the Treasury: Voluntary Best Practices for Charities
Fire Safety Act of 1990, Hotel and Motel
Fire Safety Standards, Disclosure and Methods
Florence Agreement
Food, Drug and Cosmetic Act, Federal
Ford Federal Direct Loan Program, Wm. D.
Foreign Bank Accounts
Foreign Exchange Students and Scholars -- see Mutual Educational and Cultural Exchange Act of 1961
Foreign Source Interests, Disclosure Requirements on -- see Higher Education Act of 1965 and Higher Education Amendments of 1998
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General Provisions Relating to Student Assistance Programs (Program Participation Agreements)
General Revision of the Copyright Law (1976) and Judicial Improvement Act of 1990
Genetic Information Nondiscrimination Act of 2008 (GINA)

Gift Rule LII, U.S. House of Representatives
Gift Rule XXXV, U.S. Senate
Government Contracts
Gramm-Leach-Bliley Act (Financial Services Modernization Act)

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H:

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Hazardous Materials Transportation Act of 1994
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Health Insurance Portability and Accountability Act of 1996 (HIPAA)
Higher Education Act of 1965 as amended (this page relates to financial aid programs)
Higher Education Act of 1965 as amended (this page relates to Program Participation Agreements and Reporting Requirements)
Higher Education Act of 1965 and Higher Education Amendments of 1998 (Disclosure Requirements on Foreign Source Interests)
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Independent Contractor (Tax)
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Institutional Review Boards (Federal Policy for the Protection of Human Subjects)
Intellectual Property -- see Miscellaneous Laws Affecting Universities
International Scholars, Inviting and Paying
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Intermediate Sanctions for Excess Benefits (Tax)
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Labor-Management Reporting and Disclosure Act of 1959

Lanham Act -- see The Trademark Act of 1946 (amended by the Trademark Revision Act of 1988)

Lead-Based Paint Hazard Reduction Act of 1992, Residential
Legislative and Political Activities (Tax)

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Lobbying -- see also Legislative and Political Activities (Tax) and The Byrd Amendment

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Mandatory Medicare Reporting

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Military Recruiting -- see Solomon Amendment

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Miscellaneous Laws Affecting Universities

Missing Student Notification Policy and Procedures

Motor Carrier Act of 1980

Mutual Educational and Cultural Exchange Act of 1961 (Foreign Exchange Students and Scholars)

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N:

National Cooperative Research Act of 1984

National Historic Preservation Act of 1996

National Labor Relations Act of 1947

National Science Foundation Act of 1950

Native American Graves Protection and Repatriation Act of 1990

No Electronic Theft Act

Non-Discrimination with Respect to Employment -- see Employment

Non-Discrimination with Respect to Students -- see Students
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Federal Assistance)
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Payment Card Industry Data Security Standard
Payments Made to Attorneys
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Perkins Loan Program, Federal
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Philanthropy Protection Act (1995)
PLUS Loan Program, Federal
Policy on Recombinant DNA, Federal
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Privacy Notices-Financial Institutions (The Gramm-Leach-Bliley Act)
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Program Integrity Triad
Program Participation Agreements
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- Qualified Tuition Reductions (Tax)
- Quarantine, Inspection and Licensing of Biological Products, Public Health Service Laws on
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- Recombinant DNA, Federal Policy on
- Records, Confidentiality of Patient
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- Regulation E, Electronic Fund Transfers
- Rehabilitation Act of 1973 (Sections 503 and 504) (Employment)
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- Required Disclosures under Program Participation Agreements (Financial Aid)
- Research Act of 1984, National Cooperative
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- Sarbane Oxley Act of 2002
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- Scholarships and Fellowships Paid to Foreign Students and Scholars (Tax)
- Scholarships and Religion
- Section 127 Educational Assistance Programs
- Security Act of 1990, Campus
- Selective Service Act, The Military
- Sense of Congress on Protection of Student Speech and Association Rights
- Sentencing Guidelines, Federal (Revised)
- Service Contract Act of 1965
- Sex Crimes Prevention Act, Campus
- Sexual Assault Victim Bill of Rights, Campus (amends the Campus Security Act of 1990)
- Sherman Antitrust Act of 1890
- Small Business Act

Small Business Job Protection Act of 1996
Small Webcaster Settlement Act
Social Security Act (The Federal Old Age and Survivors Insurance Trust Fund and Federal Disability and Insurance Trust Fund, and the Federal Insurance Contributions Act (FICA))
Social Security Numbers, Collection and Use of (Students) -- see Family Educational Rights and Privacy Act of 1974 (FERPA)
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Title IV -- see Higher Education Act of 1965, Education Amendments of 1976, Higher Education Amendments of 1992, and Higher Education Amendments of 1998, Title IV
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Title VII of the Civil Rights Act of 1964 (Employment) -- see also Civil Rights Act

of 1991 (amends Title VII) and Pregnancy Discrimination Act of 1978 (amends Title VII)

Title IX of the Education Amendments of 1972 (Employment)

Title IX of the Education Amendments of 1972 (Students)

Tomic v. Catholic Diocese of Peoria

Toxic Substances Control Act

Trade Commission Act, Federal

Trademark -- see Miscellaneous Laws Affecting Universities

Trademark Act of 1946 (Lanham Act) (amended by the Trademark Revision Act of 1988)

Trading with the Enemy Act (amended by the Foreign Assistance Act of 1961)

Truth in Lending Act

Truth in Negotiations Act

Tuition Payment Credit Reporting Requirements (Tax)

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U:

Unemployment Tax Act, Federal (FUTA)

Uniformed Services Employment and Reemployment Rights Act

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Unsubsidized Stafford Loan, Federal

USA PATRIOT Act

U.S. House of Representatives Gift Rule LII

U.S. Senate Gift Rule XXXV

Useful Web Sites

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V:

Verification of Employment Eligibility

Veterans' Benefits Improvement Act of 2004 (amends USERRA)

Veteran's Educational Assistance Act of 2008

Veterans' Readjustment Benefits Act (amended by the Vietnam Era Veterans' Readjustment Assistance Act of 1974 and the Veterans Employment Opportunity Act of 1998)

Veterans Readmission

Virginia Graeme Baker Pool and Spa Safety Act

Visual Artists Rights Act

Voluntary Best Practices for U.S. Based Charities: Anti-Terrorist Financing Guidelines

Volunteer Protection Act, Federal

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W:

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Wlm. D. Ford Federal Direct Loan Program
Work-Study Program, Federal

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X:

Y:

Z:

Last Revised 10-Sep-09 08:55 AM.

Red Flag Rule Process for attempted Credit Card Fraud

OGC File No. _____ Date Process Initiated _____ Initiated By _____

Action Taken	By Whom	Date Action Taken & Result
Contact Bank(s) of consumer whose card was misused	Information Security Officer	
Contact Relevant Offices (e.g., Enrollment, Finance, etc.)	Information Security Officer	
Consult with General Counsel	Information Security Officer, Office of General Counsel	
Notify Dean of School for student incident or cognizant V.P. for an administrative fraud not involving students (e.g., Finance, Development, Research, Contracting, etc.)	Information Security Officer	
Preserve evidence but deactivate any open accounts or admissions files	Information Security Officer	
Contact DPS	Office of General Counsel	

File Considered Closed: Date _____ By (Name) _____

Attachment D-2

The Catholic University of America
The Catholic University of America - Campus Legal Clearinghouse

Compliance Obligation Under Federal Non-Discrimination Statutes

Law	Record keeping	Posting	Reporting	Policy/ Assurances	Notification	Designate employee
Civil Rights Act of 1964	Title VII: IPEDS Biennially: Fall staff survey Records: 3 years 29CFR§1602.48 Faculty salary survey IPEDS General personnel records: 1 year 29CFR§1602.13, 29CFR§1602.14 Title VI: 28CFR§42.106 IPEDS Enrollment Annually	EEO Poster* 41 CFR§60-1.42 Contains specific language	Title VII: IPEDS Biennially: Fall staff survey Enrollment annually 29CFR§1602.7, 29CFR§1602.11 See also 20USC§1094(a)(17) Title VI: 34 CFR§100.6, 28CFR§42.106, 45CFR§80.6	Adoption of anti-harassment policies and complaint procedures Internal guidelines and grievance procedures for employees and students Voluntary affirmative action 29CFR§1607.17	Policy compliance statement to beneficiaries and participants Title VI 28CFR§42.106, 34CFR§100.6(d) Title VII	
Family & Medical Leave Act of 1993	29CFR§825.500: 3 years	29CFR§825.300 DOL poster		Include policy in employee handbook 29CFR§825.301	29CFR§825.208 notification of type of leave	
Equal Pay Act of 1963	29CFR§1620.32 2 years	29 C.F.R. § 516.4 (FLSA)				
Age Discrimination in Employment Act of 1967 (ADEA)	29CFR§1627.3 Payroll records: 3 years Other records: One year	29 C.F.R. §1627.10 Prohibition on age related language on help wanted notices: 29CFR§1625.4			Notice of non-discrimination on employment application 29CFR§1625.5	
Title IX of Education Amendments of 1972 and				Adoption of grievance procedures 34CFR§106.8 Dissemination of Policy 34CFR§106.9, 45CFR§86.9	34CFR§106.8. Publication of grievance procedures. Notification of non-discrimination To both applicants for admission and employment 34CFR§106.9	34CFR§106 Employee to coordinate compliance 45CFR§86.1
Executive Orders 11,246 and 11,375	Who must have aa plans 41 CFR 60-1.40 41CFR§60-1.12 2 years 41CFR§60-2 Affirmative Action program see 60-2.10 for general purpose and contents of the AA plan	EEO poster	41CFR§60-1.7 for federal contractors and subcontractors: annually by Sept. 30 Standard Form 100 (EEO-1) (not enforced); IPEDS fall staff survey biennially IPEDS enrollment survey	Written affirmative action program if fed K \$50,000 or more and 50 or more employees 41CFR§60-1.7, 41CFR§60-20.6	Text for contract clause at 48CFR§52.222-26.	
Americans with Disabilities Act of 1990	2 years for employment and 3 years for IPEDS fall staff survey 29 CFR §1602 29CFR 1602.48, and 29CFR§1602.49	EEO poster	29CFR§1602.7, 29CFR§1602.11	Notification to employees and applicants of the ADA policy is required	Notification to employees and applicants of the ADA policy is required Governmental entities: 28CFR§35.106 Notice to applicants, beneficiaries, participants and other interested persons	Officer to coordinate complaints actually un Rehab Act Regs. 34CFR§104
Rehabilitation Act of 1973	41CFR§60-741.80 2 years	EEO poster 48CFR§52.222-36. Notice of		29CFR§32.45, 34CFR§104.7 Internal review procedure with due process standards;	Invitation to self identify Students: 45CFR§84.42	Officer to coordinate complaints:

Attachment D-3

The Catholic University of America The Catholic University of America - Campus Legal Clearinghouse

Notice of Availability of Institutional and Financial Aid Information

This page has been created to fulfill CUA's compliance with the disclosure requirements under Title IV. **Title IV** requires institutions participating in financial aid programs to disclose specified information to all prospective students. Below is a list of the disclosure requirements, and links to pages that contain the actual information or where to obtain the information.

Financial Assistance Information Federal Student Financial Aid

CUA Financial Aid Programs

Financing Education Abroad

Requirements for Withdrawal and Return of Federal Financial Aid

Notice to All Students on Drug Use and Ineligibility for Federal Financial Aid

Contact Information for Financial Aid Information:
Don Bosse, Director of Financial Aid, bosse@cua.edu.

Institutional Information

Tuition and Fees at CUA

Refund of Student Charges
(includes tuition adjustment for complete withdrawal from university)

Change of Enrollment (Graduate)

Change of Enrollment (Undergraduate)

Academic Program

Transfer of Credit Policy (Doctoral)

Transfer of Credit Policy (Masters and Licentiate)

Transfer of Credit Policy (Undergraduate)

Contact Information for Transfer of Credit: Dr. Pat McMullen, Associate Provost for Administration, mcmullep@cua.edu

Accreditation and Memberships Accreditation

Middle States Commission on Higher Education page on The Catholic University of America

Disability Support Services for Students

Contact Information on Disability Support Services:

DE

Emily Singer, Director, Disability Support Services, singere@cua.edu.

Equal Opportunity/Non-Discrimination Policy

Contact Information for Equal Opportunity/Non-Discrimination Policy Issues and Title IX

Coordinator: Christine Peterson, Associate Vice President/Chief Human Resources Officer and Chief EEO Officer Petersoc@cua.edu

Copyright Infringement-Policies and Sanctions **Liability for Online Activities**

What is Wrong with Ripping?

A short video to be used for educating students about copyright law and downloading music off the Internet. The video was produced for CUA by Whatbox Productions. Copyright permission to use the song *What Happened* by Sublime was received for use in this context.

Publications, Videos and Web Tutorials On Copyright

Resources, Forms and Checklists on Copyright

Q and A on Copyright

Alternatives to Illegal Downloading and Sharing of MP3s (updated October 2009)

Intellectual Property Information for Faculty

Contact Information for Peer to Peer File sharing and Copyright Issues:

Peg O'Donnell, Associate General Counsel, Policy and Compliance, odonnelm@cua.edu or Dr. William Lantry, Director of Academic Technology and Support Services lantry@cua.edu.

Information on Graduation Rates and other Student Profile Information

Student Retention Rate

Graduation Rate Entering Class 2002

Full Time and Part Time Undergraduate and Graduate Enrollment by Ethnicity, Gender and School

Job Placement Rates

Contact Information for Graduation Rates, Retention Rate and other IPEDS information

Brian Johnston, Director, Planning and Institutional Research, johnston@cua.edu.

Student Record Privacy and FERPA

CUA Student Record Policy

Office of General Counsel Web Page on FERPA

Registrar Page on Student Records Privacy (includes Notification of Rights and Request to Prevent Disclosure of Directory Information)

Contact Information on FERPA and Student Record Privacy:

Peg O'Donnell, Associate General Counsel, Policy and Compliance, odonnelm@cua.edu or Laura Anderson, Associate Registrar and Director of FERPA training, anderslj@cua.edu

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Information on Campus Security Policies and Crime Statistics

Emergency Response Procedures

Department of Public Safety Annual Report (scroll down)

How to Report Crimes on Campus **

Coordination with Local Police**

Contact Information for Campus Security

Thomasine Johnson, Director of Public Safety johnsotn@cua.edu.

Immunization Requirements for Students

Contact Information for Immunization Policy Dr. Loretta Staudt at staudt@cua.edu

Certification Exam Success Rates

Teacher Education Reporting Requirements

Contact Information for Teacher Education Reporting Requirements: Dr. Agnes Cave, Director of Teacher Education, cave@cua.edu

CUA Policies Page (includes official university wide policies for students)

Employees to Contact for Further Required Disclosure Information

Institutional Plans for Improving the Academic Program of the Institution: Dr. James Brennan, Provost, brennan@cua.edu.

Placement Information for the Graduates of the Institution's Degree or Certificate Programs,

Dr. Alan Goodman, Director of Career Services, goodman@cua.edu,

for the Law School, Jessica Heywood, Director, heywood@law.edu

or Brian Johnston, Director, Planning and Institutional Research, johnston@cua.edu.

Graduate and Professional Programs in which graduates of CUA's undergrad program have enrolled:

Brian Johnston, Director, Planning and Institutional Research, johnston@cua.edu.

Fire Safety Report: Louis P. Alar, Director of Environmental Health and Safety, alar@cua.edu.

