

Washington and Lee University

Chart of Compliance Areas

COMPLIANCE AREA	COGNIZANT POLICY OFFICER	COMPLIANCE PARTNER(S)	REPRESENTATIVE ISSUES	APPLICABLE FEDERAL LAWS
Asset Management / Endowment	Steve McAllister VP for Finance & Administration/Treasurer	Steve McAllister , VP for Finance & Administration/Treasurer	Institutional Conflict of Interest; Non-Profit Requirements; Fiduciary Obligations	SOX; IRC
Athletics (including Gym and Wellness Center)	Jan Hathorn (NCAA) Director of Athletics June Aprille Provost	Shana Levine , Associate Athletic Director	Title IX / Gender Equity; Liability (incl. consent/release forms); Trainers; Recruiting; NCAA; Student Records	Equity in Athletics Disclosure Act; Title IX; FERPA
Campus Security	Dawn Watkins VP for Student Affairs/DOS	Mike Young , Director of Public Safety	Clery Act Reporting; Emergency Planning; Incident/Accident Investigations; Law Enforcement Records/FERPA	Clery Act; Campus Sex Crimes Prevention Act; Campus Sexual Assault Victim Bill of Rights; HEOA
Civil Rights / Non-Discrimination / Harassment / EEOC / OCR / Diversity	Steve McAllister VP for Finance & Administration/Treasurer Dawn Watkins VP for Student Affairs/DOS June Aprille Provost	Amy Barnes , Executive Director of HR Sidney Evans , Assoc. Dean for Student Services Tammy Futrell , Head CAIR Jennifer Kirkland , Associate General Counsel for Compliance Support	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	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; Genetic Information Non-Discrimination Act; HEOA
Communications / Media Relations / Newspapers & Newsletters	Dennis Cross VP for University Advancement June Aprille Provost	Jeff Hanna , Executive Director of Communications & Public Affairs Rodney Smith , Editor, Shenandoah	Libel/Slander; Confidentiality; Copyright	Copyright Act; FERPA; Gramm Leach Bliley/HIPAA; HEOA
Contracts / Procurement	Leanne Shank General Counsel	Jennifer Kirkland , Associate General Counsel for Compliance Support Justin Smith , Staff Attorney Deborah Caylor , Controller	Conflict of Interest; Contract Administration Policy; Retention Office; Compliance Provisions in Contracts (e.g. FERPA, HIPAA, GLB, Intellectual Property)	Anti-Kickback Act of 1986; Byrd Amendment; Contract Disputes Act; Copeland Anti-Kickback Act; E-SIGN Act;
Crisis Planning	Dawn Watkins	Dawn Watkins , Dean of Student Affairs	Local Agency Relations; Public Health	HEOA

	VP for Student Affairs/DOS		Issues; Transportation; Goods & Supplies; Communications; Documented Plan	
Development / Advancement	Dennis Cross VP for University Advancement	Tres Mullis , Executive Director of Development	Donor Gifts; Gift Restrictions; Confidentiality; Volunteers; CAN-SPAM?; Charitable Substantiation Rules	Pension Protection Act; Philanthropy Protection Act; Substantiation and Disclosure Provisions; HEOA
Dining Services	Steve McAllister VP for Finance & Administration/Treasurer	Alex da Silva , Director of Auxiliary Services	Food Acquisition, Handling, & Storage; Public Health Laws/Inspections; ABC Laws; Facilities Use; ADA/504 in dining	ADA/504 accommodations
Disability Services	June Aprille Provost Steve McAllister VP for Finance & Administration/Treasurer	Janet Ikeda , Associate Dean/College Sidney Evans , Associate Dean/Law Dawn Watkins , Dean of Student Affairs Amy Barnes , Executive Director of HR	Employee & Student Access/Accommodations under ADA/504	ADA; Section 504
Environmental Health and Safety	Steve McAllister VP for Finance & Administration/Treasurer	Paul Burns , Director of Environmental Health and Safety	Vehicle, Fire, Building and Facilities Safety/Codes; OSHA / Workplace Safety; Workers' Compensation; Chemicals; Waste Management; HazMat; Lab Safety; DHS & EPA Regulations	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
Employee Welfare Benefit Plans	Steve McAllister , VP for Finance & Administration/Treasurer	Amy Barnes , Executive Director of HR	TIAA-CREF 403(b) and 457(b); 457(f); Deferred Compensation; ERISA plans - - health, dental, flexible spending, retiree plans, etc.; HIPAA	Cafeteria Plan Regs.; COBRA; ERISA; HIPAA; OWBPA; Retirement and Other Deferred Compensation Arrangements; USERRA;
Federal & VA Notice and Disclosure	Leanne Shank General Counsel	Scott Dittman , Registrar Deborah Dailey , Assistant Provost for Institutional Effectiveness Amy Barnes , Executive Director of HR Mike Young , Director of Public Safety	IPEDS; SRTK; Clery; EADA; DFW; DFSCA; Institutional Information; PPAs; Other notices/disclosures for fed'l aid recipients; Reg E & Z; DOL	Student Right to Know; Clery Act; Campus Sex Crimes Prevention Act; Campus Sexual Assault Victim Bill of Rights;; Veterans' Benefits Improvement Act; HEOA

		<p>Jonathan Webster, Associate Dean of Admissions</p> <p>James Kaster, Associate Director of Financial Aid</p> <p>Sidney Evans, Associate Dean/Law</p> <p>Brandon Dotson, Associate VP for Student Affairs/DOS</p>		
Financial Aid & Admissions	<p>June Aprille Provost</p>	<p>Bill Hartog, Dean of Admissions and Financial Aid</p> <p>John DeCourcy, Director of Financial Aid</p> <p>Sidney Evans, Associate Dean/Law</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; Federal Work Study Requirements; HEOA</p>
Fiscal Management	<p>Steve McAllister VP for Finance & Administration/Treasurer</p>	<p>Deborah Caylor, Controller</p>	<p>Cash; Credit & Debit Cards; Allowable Expenses; Property Inventory; System Controls; Accounts Payable/Receivable; Purchasing; PCI DSS</p>	<p>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</p>
Governance	<p>James Farrar Secretary of the University</p> <p>Leanne Shank General Counsel</p>	<p>Leanne Shank, General Counsel</p>	<p>Conflicts of Interest; Bylaws and Articles of Incorporation; Board of Trustees; Committees; IRS and SOX Reqs; Executive Compensation; Whistleblower</p>	<p>SOX; IRS Regs. and Good Governance practices; Federal Sentencing Guidelines;</p>
Grants Administration	<p>Dennis Cross VP for University Advancement</p> <p>June Aprille Provost</p>	<p>George Carras, Dir. of Corp. and Found. Relations</p>	<p>Pre-Award Requirements; Effort Certifications; Post-Award Requirements; Financial Reporting; Regulatory Review/Approval</p>	<p>Byrd Amendment; IRB; OMB A-110; HEOA</p>
Human Resources	<p>Steve McAllister</p>	<p>Amy Barnes, Executive Director of HR</p>	<p>Workers' Compensation; Employment</p>	<p>FLSA; DFSCA; Drug-Free Workplace Act;</p>

	VP for Finance & Administration/Treasurer		Benefits & Leaves; FMLA; USERRA; Wage/Hour; Personnel Policies; Recruiting/Hiring; Supervisor Training; Termination/Departure/Early Retirement	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
Information Privacy and Security	Leanne Shank General Counsel	Rick Peterson , Chief Technology Officer Scott Dittman , Registrar Jane Horton , Director of Student Health & Counseling Amy Barnes , Executive Director of HR Steve McAllister , VP for Finance & Administration/Treasurer/Treasurer Deborah Caylor , Controller Dean Tallman , Information Security Officer	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)	FERPA; GLBA; PCIDSS; HIPAA; ADA; Solomon Amendment; FACTA
Insurance	Steve McAllister VP for Finance & Administration/Treasurer	Stephanie Arbanas , Director of Budgets	Required/Recommended Types, Scope & Coverage Limits; Incident Reporting; Required & Best Practices for Covered Compliance Areas; Indemnity; Insurance Certificate Tracking	
International Issues	June Aprille Provost Steve McAllister VP for Finance & Administration/Treasurer	Amy Richwine , Associate Director of International Student/Scholar Adv. Amy Barnes , Executive Director of HR Deborah Caylor , Controller	Study Abroad; Foreign Scholars & Students; Visiting Artists/Lecturers; Immigration (Taxes & SEVIS)	Immigration and Nationality Act; Mutual Educational and Cultural Exchange Act;
Intellectual Property	June Aprille	Rick Peterson , Chief Technology Officer	Copyrights; University Marks; License	American Jobs Creation Act of 2004; Visual

	Provost Steve McAllister VP for Finance & Administration/Treasurer	Rob Mish , Lenfest Center Jason Rodocker , Dir. University Commons and Campus Activities Karen Lyle , Permissions Facilitator Dick Kuettner , Tucker Multimedia Ctr. Berkley Harner , Copy Center Sally Wiant/Merrily Taylor , Librarians George Carras , Director of Corp. and Foundation Relations William and Maureen Becker , University Bookstore Leanne Shank , General Counsel	Agreements; DMCA; PTP; ASCAP/BMI Licenses	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
IT / Computing	June Aprille Provost	Rick Peterson Chief Technology Officer	Internet File-Sharing; DMCA Agent; Appropriate Use/Access; Email Privacy; Network Security; PCI DSS	CAN-SPAM; CALEA; ECPA; DMCA; No Electronic Theft Act; HEOA
Records Retention / Management / E-Discovery and Document Production Requests	Leanne Shank General Counsel	Rick Peterson , Chief Technology Officer Jennifer Kirkland , Associate General Counsel for Compliance Support Justin Smith , Staff Attorney	Record Retention Policy and Schedule; Litigation Holds; Response to Law Enforcement / Agency Inquiries?	FERPA; SOX; Federal Sentencing Guidelines
Research	June Aprille Provost	Hank Dobin (or designee) , Research Integrity Officer Wythe Whiting , Chair of IRB Jack Wielgus , Chair of Institutional Animal Use & Care Committee	Human Subjects; Animal Use & Care; IRB; Scientific Misconduct; Informed Consent; ITAR / EAR	IRB; National Cooperative Research Act; National Science Foundation Act; Public Health Service Act; HEOA
Special Academic Areas	June Aprille Provost	Beverly Lorig , Director of Career Services Loriann Olan , Director of Career Planning/Law Hank Dobin , Dean of the College Larry Peppers , Dean of the Williams School Rod Smolla , Dean of the Law School Bob Strong , Associate Provost Lenna Ojure , Director, Teacher	(Externships/Internships and Placement; Constitution Day) Releases/Waivers; Non-Discrimination; Immigration Issues/Visas	Title VI/IX; Immigration and Nationality Act; SEVIS Regs.; Solomon Amendment; HEOA

		Education		
Student Affairs	Dawn Watkins VP for Student Affairs/DOS	Jason Rodocker , Dir. of University Commons and Campus Activities David Leonard , Associate Dean of Student Affairs Brandon Dotson , Assoc. VP for Student Affairs/DOS	Alcohol; Greek Organizations; Student Organizations Residential Life, ADA/504 in housing Student Discipline	DFSCA; ADA/Rehabilitation Act of 1973; FERPA; HEOA
Student Health and Counseling	Dawn Watkins VP for Student Affairs/DOS	Jane Horton , 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	Dennis Cross Director of University Advancement June Aprille Provost	Barbara Mollica , Dir. of Special Events Jan Hathorn , Director of Athletics Robert Fure , Director of Special Programs	Releases/ Waivers and Facilities Use Forms; Indemnification; Assumptions of Risk; Parental Consent Forms; Appropriate Supervision; Insurance; Best Practices	Hotel and Motel Fire Safety Act of 1990;

<p>Tax Issues</p>	<p>Steve McAllister VP for Finance & Administration/Treasurer</p>	<p>Deborah Caylor, Controller Leanne Shank, General Counsel – 501c3</p>	<p>501(c)(3) 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.</p>	<p>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;</p>
<p>WLUR Radio Station</p>	<p>Dennis Cross Director of University Advancement</p>	<p>Jeremy Franklin, WLUR General Manager</p>	<p>Slander; FCC Requirements and Filings</p>	<p>FCC Regulations; Small Webcaster Settlement Act;</p>
<p>GLOBAL ISSUES and Miscellaneous</p>				<p>Sherman Act; Clayton Act; Communications Decency Act; Higher Ed. Act/Amendments (Title IV); National Historic Preservation Act of 1996; PATRIOT Act; FTC Act; Trading With the Enemy Act;</p>