

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, Payroll & Tax Department,	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu	Usha Mathew, Ass't VP, Finance/Controller ujmathew@uh.edu	• Accounting • Financial reporting • Internal controls • Payment for expenditures	• General Appropriations Act • Red Flag Rules • Tax Code • Texas Educ. Code

	Financial Reporting and Accounting Services	Unit Leader: Karin Livingston AVP for Finance klivingston@uh.edu		• Property inventory • Travel	
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 mrm Maxwell@uh.edu	• Non-discrimination • Privacy of student education records	• FERPA • Texas Educ. Code
Advancement	Advancement and Alumni	Russell Dunlavy, VP Advancement and Alumni rt Dunlavy@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	UHPD	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	<i>Contracts:</i> Mark Yzaguirre, Assoc. VP & Assoc. GC Contracts Administration myzaguirre@uh.edu contractadmin@uh.edu <i>Real Estate & Construction Contracts:</i> 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, Environmental Health and Emergency Preparedness 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, Environmental Health and Emergency Preparedness krboysen@uh.edu	Lisa Benford, Dir. EHS lbenford@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 Plan	CFR, EAR, ITAR, OFAC, NISPOM, NSDD-189

Facilities	Facilities/Construction Management	Raymond Bartlett, Sr. VP, Administration and Finance rbartlett@uh.edu Unit Leader: David Oliver, Senior AVP Facilities/Construction Mgmt. jdoliver@uh.edu	<i>Facilities Business Ops & Compliance:</i> Magda Brady, Ass't VP Facilities Business Ops & Compliance malanis6@uh.edu <i>Facilities Services:</i> Michael Oestereicher, Ass't VP, Facilities Services moestereicher@uh.edu <i>Facilities Construction:</i> Nick Merry, Ass't VP Capital Project Mgmt. nlmerry@uh.edu <i>Facilities Planning:</i> Christa Rieck, Ass't VP Facilities Planning choward4@uh.edu <i>Facilities Partnerships & Engagement:</i> Jennifer Rea, Exec. Dir. Facilities Partnerships jdrea2@uh.edu	Compliance, 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 BOR approval processing for Facilities related agenda items, policy review for Facilities department	• Life Safety Code • TCEQ regs • Texas Educ. Code §61 • THECB reporting and approval requirements
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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, Environmental Health and Emergency Preparedness 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 non-monetary) • 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 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	• 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 Act • Dep't of Commerce regs • NIH guidelines • Tech 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	UIT 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 lholdeman@uh.edu	Patrick Mulligan, Exec. Dir., Brand Mgmt., Licensing & Trademarks pjmulligan@uh.edu	• Intellectual Property Use • Trademarks 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 requests • Litigation holds • Public Information Act requests • Record 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 Crimes Prevention Act • FERPA; Texas Educ. Code • Title 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	Russell Dunlavy, VP Advancement and Alumni rtunlavy@uh.edu	Ben Spofford, Chief of Staff to Advancement and Alumni bjspofford@uh.edu	• Expenses • Gift receipting • Internal controls • MOUs	SAM 08.A.02 – Private Support Organizations and Foundations
Trademark Management	Marketing and Communications	Lisa Holdeman, VP, Marketing and Communications lholdeman@uh.edu	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