

**UNIVERSITY OF HOUSTON SYSTEM  
INSTITUTIONAL COMPLIANCE STATUS REPORT  
For the 3 months ended December 31, 2008**

Institutional compliance activities at each university during the three months ended December 31, 2008 are as follows:

| <u>Activity</u>                            | <u>UH/UHS</u> | <u>UHCL</u> | <u>UHD</u> | <u>UHV</u> |
|--|---------------|-------------|------------|------------|
| Risk Assessments Completed                 | 1             | 0           | 4          | 1          |
| Risk Assessments Updated                   | 1             | 0           | 4          | 0          |
| Compliance Audits Conducted                | 154           | 0           | 1          | 3          |
| Compliance Committee Meetings Held         | 1             | 2           | 1          | 1          |
| Risk Mitigation Implemented:               |               |             |            |            |
| Specific Control Activities (pol. & proc.) | 32            | 0           | 0          | 19         |
| New Training Program / Activities          | 18            | 0           | 2          | 11         |

Hot-line Reports:

|  |    |   |   |   |
|--|----|---|---|---|
| Number Received during quarter         | 12 | 0 | 0 | 0 |
| Reports Resolved during quarter        | 11 | 0 | 0 | 0 |
| Unresolved Reports as of Dec. 31, 2008 | 3  | 0 | 0 | 0 |

**UHS:**

A system-wide meeting of the institutional compliance officers was held on October 15, 2008 to discuss institutional compliance activities. Included on the meeting agenda were the following:

- Review of report to be presented to the audit and compliance committee on December 9, 2008
- Cooperative Problem Solving – Sharing of Ideas (discussion by all compliance officers of major concerns / accomplishments)
- Presentation by Mike Glisson – Managing the Business Risk of Fraud
- Update on current research compliance issues by Rosemary Grimmet
- Presentation by Sara Carter – Training monitoring update

Following are the training statistics for FY 2008 and for FY 2009 as of January 13, 2009.

**Mandatory Training Completion Stats (All Campuses)**

|                          | FY 08  | FY 09  |
|--------------------------|--------|--------|
| UH Clear Lake Total      | 83.24% | 90.54% |
| UH Downtown Total        | 88.45% | 83.75% |
| UH Main and System Total | 79.45% | 87.80% |
| UH Victoria Total        | 84.94% | 99.06% |
| Total (All Campuses)     | 80.68% | 88.04% |

\* UHV, UHD, and UH Main extended the deadline to 1/31/09

**UH:**

**Research**

The Division of Research held a workshop for faculty on October 10, 2008. Presentations included discussion of UH compliance policies.

**Public Safety**

The University of Houston Department of Public Safety conducted its required Training Provider Advisory Board Meeting on December 11, 2008 in compliance with Texas Commission on Law Enforcement requirements to maintain our agency training provider status with the Commission.

The University of Houston Department of Public Safety (UHDPS) began the re-certification process for the Texas Law Enforcement Electronic Telecommunications System (TLETS) and for the National Crime Information Center (NCIC) and the Texas Crime Information Center (TCIC). Ninety percent of the peace officers and dispatchers have completed the recertification testing. The remaining ten percent will complete the training in January. All UHDPS peace officers and dispatchers must complete the recertification by March 31, 2009.

**Finance**

The Red Flag Rules Committee has completed or is working on the following tasks to ensure compliance with the Fair and Accurate Credit Transactions Act of 2003 (FACT Act) and related rules issued by the Federal Trade Commission:

- Drafting a SAM policy
- Drafting campus-specific policies
- Conducted campus-specific risk assessments to determine which units are affected by the Red Flag Rules
- Posted a Request for Information (RFI) for Red Flag Rules Solutions on the Texas Electronic State Business Daily to gather information about vendor-provided solutions
- Viewed demos of identify theft prevention and detection products offered by LexisNexis and plan to use some of these products on a trial basis in January and February
- Requested the timeframe and cost for modifying the PeopleSoft Student System to issue an automated confirmation email to students when they request an address change
- Modifying Secure Our Systems Training, which all UHS employees are required to take annually, to include information about the Red Flag Rules
- Confirmed with HigherOne, which issues student refunds, that they are compliant with the FACT Act

The Payment Card Industry (PCI) Committee has completed or is working on the following tasks to ensure compliance with PCI Standards:

- Renewing the contract with Verizon Business Systems to document PCI compliance through their online product
- Posted a Request for Information (RFI) for PCI compliance services on the Texas Electronic State Business Daily to see which other companies might provide this service in the future

- Working with Bank of America to move an additional 13 UHS merchants to the BOA Payment Collection Gateway, which is PCI compliant (about 30 UHS merchants are already using the Gateway)
- Working with other UHS vendors that have unique operations to make sure they are PCI compliant

## **Human Resources:**

### ANNUAL MANDATORY TRAINING

Annual Mandatory Training Window opens for all employees 10/1/08-12/31/08.

As of 12/31/08 the Main Campus was at 82% compliance. The deadline has since been extended for Main Campus employees to January 31, 2009.

### Electronic I-9 Form (e I-9)

HR and HRMS have completed development of a new electronic version of the I-9 (Employment Eligibility Verification Form).

This new paperless process will centralize the process for all employment new hires to come through HR. (Staff, Faculty and Students)

This was to be introduced to the main campus and system wide but due to a formal change in the form as of 2/2/09, we will introduce the process at that time.

### AIG Third Party Administrator (TPA) for TDA and ORP Plan Providers

HR and Payroll have successfully transitioned the contributions for all plan providers through one TPA as of 12/31/08. Per new federal regulations on 403(b) plans we were required to administer the plan with greater oversight and coordination. The University system and all campuses are now sending employee and employer contributions to AIG for dissemination to the appropriate plan provider. We are still completing agreements with some providers and there was an extension to compliance to 12/31/09.

### Family and Medical Leave Act Amendments

HR has updated and revised forms and communication to incorporate the amendments to FMLA which are effective 1/16/09. We have posted these to the HR website and we have shared them with CDA's at their most recent January meeting. Two full-time HR staff members were sent to FMLA/ADA training in October of 2008 and received certification to administer and manage these leave processes and other work related accommodations under these two Federal acts.

### **Environmental Health and Risk Management Training**

General Laboratory Safety (Presented 1 Time)

Biological Safety (Presented 2 Times)

Biohazardous Materials Shipping (Presented 2 Times)

Bloodborne Pathogens (Presented 2 Times)

Principal Investigator Recombinant DNA (Presented 2 Times)

Environmental Compliance

Radioactive Material Safety  
X-ray Safety Training  
Laser Safety Training  
Online Annual Radioactive Material Safety Refresher  
Online Annual Laser Safety Refresher  
Online Hazardous Waste Procedures  
Online Environmental Compliance  
Online Bloodborne Pathogens Refresher

### **Regulatory Safety Committees**

Radiation Safety Committee (2 Meetings)  
Institutional Biosafety Committee

### **New Regulated Safety Programs/Activities**

Research Laboratories Safety Showers and Eyewashes Equipment Upgrade Compliance Project Ongoing  
Updated CHEMTREC contact information and now have one standard 24/7 phone number for University  
Approval from City of Houston to reduce frequency of required pump outs for 8 campus traps (grease, lint)  
Initiated regular meetings with other UH System representatives to discuss common EH&S concerns

### **Compliance Audits**

Comprehensive Laboratory Safety Audits

|                             |     |
|-----------------------------|-----|
| General and Chemical Safety | 100 |
| Biosafety                   | 37  |
| Controlled Substances       | 2   |
| Radioactive Material Safety | 5   |
| X-ray Safety                | 1   |
| Laser Safety                | 9   |

### **Regulatory Safety Reports/Actions**

Conducted annual SPCC Plan briefing per regulatory requirements  
Chemical Waste Shipment (3 Times)  
Biological Waste Shipment (3 Times)  
Amended Laser Registration  
Medical Physicist's review of Medical & Veterinarian X-ray Machines

### **Regulatory Safety Inspections**

State Inspection of X-ray Registration – No Violations

### **UHCL:**

A UHCL compliance committee was held on November 13, 2008 with presenters Mr. Don Guyton and Mary Cook. Included on the meeting agenda were the following:

- a. A quorum was called and the meeting called to order.
- b. The minutes of the May 29, 2008, meeting were approved with no corrections
- c. Don Guyton presented the UHS – BOR Policy 42.01 Institutional Compliance
- d. Mary Cook UHD presented:
  1. Components of an Effective Compliance Program
  2. Risk Assessment Strategies, and
  3. Key Elements of the “Quick Reference” Document

A UHCL compliance committee was held on December 11, 2008. Included on the meeting agenda were the following:

- a. A quorum existed and the meeting called to order.
- b. The minutes of the November 13, 2008 minutes were approved with no corrections.
- c. Revised Compliance Committee members list was approved with corrections.
- d. Expansion of Assessments to Component level was approved for implementation.
- e. System Computing setup was discussed including Optimization.
- f. The UHD Optimization form was approved as the foundation for the project.
- g. Forms Access capability will be determined for project feasibility.
- h. Compliance section worksheets with Component list corrections will continue until completed by all components.

#### **UHD:**

During the quarterly meeting:

- Reviewed progress-to-date versus FY09 goals.
- Risk Assessment Update provided, discussed actions to be taken and current status. Discussed changes to the list of institutional impact risks.
- Subject matter experts gave reports on the identified institutional risk areas. The reports highlighted failures detected by the monitored controls, actions taken to mitigate future failures, training, new policies, procedures, or regulations and new areas of compliance concerns.
- A Compliance and MySafeCampus training PowerPoint was presented to the committee members for comments and fine tuning. The vision is to provide a tool for the committee members to use to heighten the awareness of MySafeCampus.

The final UHD Employee Standard of Conducts Guide has been completed and forwarded to OGC for review.

Over 90% of UHD employees have signed the ESO Staff Handbook “Statement of Acceptance.” The handbook provides information about UHD policies, procedures, benefits and working conditions.

IT Risk Management Plan activities include the following:

- The annual update of the IT Risk Assessment for Major IT systems began in November, 2008. Both the Risk Assessment and the resulting Risk Management Plan

update for Major IT systems should be completed before the next Institutional Compliance report.

The UHD Compliance Officer attended the Compliance and Ethics Academy, met the requirements and passed the exam to become a Certified Compliance and Ethics Professional.

#### **UHV:**

The quarterly compliance meeting was held October 23<sup>rd</sup>, 2008 (minutes posted online at <http://www.uhv.edu/compliance/meetings.asp> ). Notable quarterly compliance activities included:

- Conducted annual departmental fraud/risk survey for FY08 operations. All unit heads completed.
- Formally closed out the two State Office of Risk Management recommendations received during their 2008 Risk Management Program Review.
- No known hotline or other reports of fraud were received during the quarter.
- Athletic Department completed initial Risk Assessment associated with NAIA compliance and the Student Athlete Handbook was also published online.
- Purchasing, Related Party, Cash Funds and Cash Handling, and Reimbursement for Travel and other Expenses campus policies were updated. New policy, Student Athlete Per Diem approved.
- Updated campus Compliance website “Reporting Fraud, Waste and Abuse” for easier reporting ([www.uhv.edu/compliance/fraud\\_reporting.asp](http://www.uhv.edu/compliance/fraud_reporting.asp) )
- Finance Functional Analyst reviewed PeopleSoft security access of certain positions in Student Financials and Financial Aid, adjusting access to actual position requirements (to prevent unauthorized/unintentional access or manipulation of data outside of employees’ actual job role)
- International Programs finalized and posted International Agreement Routing Form. Tool for timely notifications, reviews and proper authorizations for proposed new study abroad programs.
- Safety and Risk conducted a quarterly Safety and Risk Advisory Committee meeting on July 29<sup>th</sup>;
- Biennial review of campus Indoor Air Quality procedures and protocols was conducted with Facilities staff;

The information in this summary is taken from a more detailed campus departmental report of activities. The complete quarterly report is available online at [www.uhv.edu/compliance/reports.asp](http://www.uhv.edu/compliance/reports.asp) .

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Don F. Guyton  
System-wide Compliance Officer  
January 16, 2009