

**UNIVERSITY OF HOUSTON SYSTEM  
INSTITUTIONAL COMPLIANCE STATUS REPORT  
For the 3 months ended September 30, 2008**

Institutional compliance activities at each university during the three months ended September 30, 2008 are as follows:

<u>Activity</u>	<u>UH/UHS</u>	<u>UHCL</u>	<u>UHD</u>	<u>UHV</u>
Risk Assessments Completed	0	0	0	0
Risk Assessments Updated	2	0	0	0
Compliance Audits Conducted	198	0	2	3
Compliance Committee Meetings Held	1	0	1	1
Risk Mitigation Implemented:				
Specific Control Activities (pol. & proc.)	21	0	26	14
New Training Program / Activities	2	0	3	11
Hot-line Reports:				
Number Received during quarter	2	0	0	0
Reports Resolved during quarter	11	0	0	0
Unresolved Reports as of Sept. 30, 2008	2	0	0	0

**UHS:**

A system-wide meeting of the institutional compliance officers was held on July 16, 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 August 5, 2008
- Cooperative Problem Solving – Sharing of Ideas (discussion by all compliance officers of major concerns / accomplishments)
- Presentation by Mary Cook – Facilitation of Institutional Compliance Committee Meeting
- Presentation by Mike Glisson – Result of student auditors P-Card audits and P-Card management reports
- Presentation by Emily Messa – Training monitoring update

**UH:** September 9, 2008 the Division of Research hosted an open invitation video broadcast entitled “Good Customer Service” presented by the National Council of Research Administrators.

The UH Department of Public Safety published the 2007 Annual Security Report as required by the Jeanne Cleary Disclosure of Campus Security Policy and Campus Crime Statistics Act.

Environmental Health and Risk Management conducted regulatory training as follows:

- General Laboratory Safety (Presented 6 Times)
- Biological Safety (Presented 2 Times)
- Biohazardous Materials Shipping
- Bloodborne Pathogens (Presented 4 Times)
- Principal Investigator Recombinant DNA
- Radioactive Material Safety (Presented 2 Times)
- X-ray Safety Training
- Laser Safety Training
- Online Annual Radioactive Material Safety Refresher
- Online Annual Laser Safety Refresher
- Online Hazardous Waste Procedures
- Online Indoor Air Quality and Mold
- Online Bloodborne Pathogens Refresher

Environmental Health and Risk Management conducted regulatory audits at 198 laboratories. The department also completed the City of Houston registration process for grease traps, lint traps and grit traps on campus. A project was also initiated during the quarter to repair or install safety showers and emergency eyewashes at 12 locations in Science and Research 1 Building.

UH Finance departments updated the mandatory role-based training courses for FY09. Faculty and staff with related job responsibilities are enrolled in appropriate online training and must complete it by December 31, 2008. The FY09 role-based training courses are as follows:

- Cash Deposit and Security Procedures
- Cash Security Procedures
- Credit Card Accounting
- Credit Card Data Security
- Credit Card Processing
- P-Card Cardholder
- P-Card Business Office
- Petty Cash and Change Fund
- Property Management Guidelines
- Travel Card Cardholder
- Travel Card Business Office

On September 23, 2008, UH Finance departments participated in the following national audio conference: “Critical Issues in Unclaimed Property: Guidelines to Ensure Compliance.”

All UH credit card merchants completed a PCI (Payment Card Industry) Questionnaire to determine their current level of compliance with PCI Standards. The PCI team reviewed all questionnaires and notified each merchant whether any additional actions were needed to be certified as fully compliant. The PCI team continues to work with merchants that are not yet certified to achieve full compliance.

**UHCL:** The quarterly meeting planned for September 11, 2008 was cancelled due to campus closure for Hurricane Ike and was not able to be rescheduled within that quarter.

**UHD:** During the quarterly meeting:

- We reviewed our progress-to-date versus:
  - Our FY08 goals and
  - The “Components of an Effective Compliance Program”.
- We reviewed the goals for FY09.
- 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.
- Three areas were identified that will require a bottom-up risk assessment and the completed development/redevelopment of a risk management plan.
- Other new areas of compliance concerns were discussed.

Policies have been updated effective September 29, 2008, on “Sexual Harassment”, “Staff Grievance”, “Title IX and Other Discrimination Complaints” and “Cash Handling”.

Employment Services and Operations published the “Staff Handbook” that provides information about UHD policies, procedures, benefits and working conditions.

The current draft of the Employee Standards of Conduct Guide is currently under Academic review.

Development of the UHD Institutional Compliance Website continues. Progress has been slowed as UHD moves toward launch of its totally re-engineered web site (February 2009).

IT Risk Management Plan activities include the following:

- Initial training materials were developed to address several IT Risk Management Plan action items aimed at improving protection of sensitive and confidential data available through UHD's information systems. They were reviewed in a pilot project during August and September 2007. Enhancements will be made based on the pilot project and additional input from application owners and the training will be delivered to faculty and staff.
- Significant improvements in accessibility and ADA Compliance have been made to university's new web site (February 2009 launch).
- Results are pending for the TAC 202 Audit of UHD Information Technology that took place during May and June of 2008.

**UHV:** The quarterly campus compliance meeting was held on July 31<sup>st</sup>. Minutes are available online.

During the quarter, notable compliance related activities included:

- Texas Veterans Commission audited the campus Financial Aid VA Program in August. No findings were reported.
- State Office of Risk Management (SORM) conducted a two day on-site Risk Management Program Review on July 15-16 and made two recommendations for improvement along with several notable observations. ( To view, scroll down to 18 a. <http://www.uhv.edu/Business/CampusSafety.asp>
- No known Hotline or other reports of fraud were received during the quarter.
- Formal Employee Wellness Program, outlined in UHV policy C-32, was approved.
- IT Policies G-2, Acceptable Use Policy for Technology Resources and G-4, Software Management, were updated.
- Campus Business Continuity Plan was activated by the President as Victoria prepared for Hurricane Ike's landfall. UHV was closed from Thursday, 9/11 and re-opened noon, 9/15.
- The Office of International Programs began face-to-face orientations for students participating in study abroad programs. Part of orientation addresses safety/risk concerns when traveling abroad.
- Annual mandatory SORM Indoor Air Quality training review for employees in certain positions was coordinated by the Safety & Risk Manager.
- State Auditor's Office, in assessment of UHV's Business Continuity Plan, reported that 17 of 29 required NIMS elements were in the UHV emergency plan. Current plan will be updated.

The information in this report is taken from a more detailed campus departmental report of activities. The full report (Quarterly Report, 3rd Qtr Calendar Year 2008) will be available October 10th on the compliance website:

<http://www.uhv.edu/compliance/reports.asp>

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 System-wide Compliance Officer  
 October 9, 2008