UNIVERSITY OF HOUSTON SYSTEM
INSTITUTIONAL COMPLIANCE STATUS REPORT
For the three months ended September 30, 2019

Hotline activity at each university during the three months ended September 30, 2019 was as follows:

	UH/UHS	UHCL	UHD	UHV
Number Received during last 3 months	20	9	2	3
Reports Resolved during last 3 months	15	5	5	3
Unresolved Reports as of September 30, 2019	13	9	3	1

Institutional compliance activities at each university during the three months ended September 30, 2019 are as follows:

University of Houston System:

■ UHS Clery Act Compliance

New Compliance Initiatives:
• Initiated UHS Clery map project for all System universities to have uniform and annually updated Clery geography maps.

Compliance-related Activity:
• All System universities completed and published the Annual Security and Fire Safety Report to their respective communities.
• Monthly meetings conducted for all four university and separate campus Clery Compliance Officers.

■ UHS Compliance
• A system-wide meeting of the UHS Institutional Compliance officers and committee members was held October 9, 2019 to discuss institutional compliance activities. The meeting agenda included the following:
  o Review of reports to be presented to the Audit and Compliance Committee of the UHS Board of Regents on November 14, 2019
  o Cooperative problem solving – Sharing of ideas and discussion by compliance officers/designees of major concerns/accomplishments:
    - Don Guyton, UHS System Chief Compliance Officer and Chief Audit Executive – UHS Compliance
    - Susan Koch, UH Chief Compliance Officer – UH Compliance
      ➢ Proposed changes to the policy development process for SAMs
      ➢ New Office of Compliance and Ethics webpages
    - Al Black, UHCL, Director, EHS and Emergency Management – UHCL Compliance

- Stefany Records, UHD Director, Administrative Operations & Compliance – UHD Compliance
- Tim Michalski, UHV, Director of Business Services – UHV Compliance
  o Presentations/Updates by Subject Matter Experts:
    - Jason Marquez – UHS, System Clery Coordinator. Clery Updates
    - Gaston Reinoso – UHS, Associate Vice Chancellor/Vice President for Human Resources
      ➢ Mandatory training dates
      ➢ New HR compliance training program
    - Sandra Armstrong, UH, Executive Director, Human Resources Operations. Updates
    - Karin Livingston – UH, Assistant Vice President for Finance and Controller. Updates
    - Cynthia Vargas – UHD, Director, Emergency Management. UHD Emergency Management. Updates
    - Stuart Sherman – UHV, Assistant Fire Marshal, Emergency Manager. Updates
    - Lauri Schneidau Ruiz – UHS/UH, Senior Assistant General Counsel. Legal Updates
    - Kelly Boysen – UH, Director of Emergency Management, Campus Safety – Office of Emergency Management. Emergency Management Updates
    - Toni Benoit – UHS, Interim AVC/AVP, Access, Equity and Diversity; Director of Investigations; Office of Equal Opportunity Services. Updates
    - Wayne Brown – UH, Director of Risk Management
      ➢ Foreign Travel Insurance updates
      ➢ Claim updates
      ➢ Insurance renewal
    - Kirstin Holzschuh – UH, Executive Director, Research Integrity and Oversight, Division of Research. Division of Research Updates
    - Mary Dickerson – UHS/UH, Assistant Vice President | Assistant Vice Chancellor, IT Security/CISO. Information Security Updates

Compliance-related activity:
- New UHS Office of Compliance and Ethics webpages launched (with links to each University's compliance officer contacts and each University's Institutional Compliance Program and policies).

■ UHS Finance

New protocols/policies implemented:
- Vendor set-up and information modification processes have been updated to help ensure secure transmission, review for red flags, and additional confirmation of high risk items such as bank account and contact information changes.

■ UHS Information Security

New protocols/policies implemented:
- In accordance with action items associated with the Audit Findings identified through the Schneider Downs Cybersecurity Audit, including the centralization of the UHS Information Security Program, we are continuing to implement various new protocols across all of the UHS universities.
- Several Information Security UH MAPPs were elevated to SAMs during the last policy review process including: SAM 07.A.10 (Information Security Program) and SAM 07.A.11 (Information Security Incident Reporting and Investigation).

New compliance-related training:
- The Secure Our Systems cyber security training for faculty and staff was modified to comply with new requirements defined in HB 3834 passed by the Texas Legislature during the last session. Additional actions will be taken during the next six months to address additional new requirements contained in the legislation.

Compliance-related training:
- Multiple information security workshops and awareness activities were held throughout the quarter on each campus.

Compliance audits/investigations conducted:
- External – UHS Information Security assisted police departments at UH, UHD and UHCL with CJIS Audits being conducted by Texas DPS
- External – Schneider Downs conducted a Vulnerability and Penetration Testing Audit for all UHS campuses at the direction of UHS Internal Audit

Other compliance-related activity:
- Red Flag Rule Reports: Employees and students receive an automated email notification when their email address, physical address, W-4 withholding, or direct deposit information is changed in the system. Between July 1, 2019 and September 30, 2019, a total of 29 inquiries were reported to UHS Information Security. The breakdown of reports by campus is as follows: UH Victoria – 15, UH Downtown – 4, UH Clear Lake – 2, UH – 8. Four of the reports were determined to be security incidents.
- Digital Millennium Copyright Act (DMCA) notices: 39 complaints were received during the quarter. This compares with 41 in the same quarter in 2018, 76 in 2017 and 561 in 2016 and represents the continued effectiveness of technology implementations.
- Legal Holds: Under the direction of the Office of General Counsel, UHS Information Security did not process any new litigation holds this past quarter. No litigation hold cases were closed this past quarter. There are currently 34 active litigation holds consisting of 825 GB file shares and 8 TB external hard drives.
- During the quarter, monthly information security reports were submitted to the Texas Department of Information Resources (DIR) for the UH System agency.

- UHS Information Security staff participated in multiple Texas DIR hosted meetings of the Information Security Working Group/Network Security Operations Center and State Information Security Advisory Committee/Policy Sub-committee.

■ UHS Emergency Management

Compliance-related activity:
- Integration of the University of Houston System into the State's Emergency Management Plan is in progress per requirement as a member agency of the Texas Emergency Management Council.

University of Houston:

■ UH Compliance
- The UH Institutional Compliance Committee held its quarterly meeting September 10, 2019 and covered the following agenda items:
  - Presentation on Quarterly Board Report by Don Guyton, Chief Audit Executive
  - Legislative Update, Lauri Schneidau Ruiz, Senior Assistant General Counsel
  - Policy Update and Changes to Policy Development Process, Susan Koch, Chief Compliance Officer
  - Lab Safety Check-In, Susan Koch, Chief Compliance Officer
  - Administrative Matters, Review and Approval of Minutes – May 21, 2019
- The Chief Compliance Officer achieved certification as a Certified Compliance & Ethics Professional from the Society of Corporate Compliance and Ethics.

■ Academic Affairs

Compliance-related activity:
- 2019 Commission on Colleges of the Southern Association of Colleges and Schools (SACSCOC) Financial Profile and Indicators submitted by Institutional Effectiveness Office. This is an annual report required by SACSCOC, compiled and created by Institutional Research then verified by the Provost and President.
- Submitted to SACSCOC a notification about a change in address for an off-campus instructional site within the same geographic area regarding the University of Houston at Katy. This formally transferred the site address for UH at Katy from the Houston Community College-Katy Campus to the new UH at Katy building. This change was also updated with the U.S. Department of Education to address reporting requirements for federal student funding.
- Submitted Monitoring Report in response to request by SACSCOC Board of Trustees. This is the last final compliance activity related to UH's 10-year reaffirmation process.
- IE Director participating in Liaison Committee on Medical Education (LCME) Accreditation Mock Visit for the College of Medicine to address institutional assessment practices.

- Athletics

  New protocols/policies implemented:
  - Implemented American Athletic Conference required annual Compliance Attestation for all athletic department employees in conjunction with outside income reporting.
  - Updated Campus Visit Policy and submitted to the Chancellor for review and approval.
  - Reviewed and updated policies and procedures for eligibility, outside competition, playing and practice seasons, amateurism, agents, countable athletically related activities, athletics participation, and individuals associated with prospective student-athletes.

  Compliance-related training:
  - Resumed monthly individual team rules education in September (including but not limited to recruiting reminders for contacts, evaluations, calls, correspondence, and recruiting calendars)
  - Education with all student-athletes team by team to review beginning of year compliance reminders
  - Annual training with internal groups including tutors, game operations and event management, men's basketball, football and baseball managers, and ticket operations
  - Meeting with admissions representatives regarding campus tours

  Compliance audits/investigations conducted:
  - 6 violations identified of which 5 submitted to NCAA and 1 in process for submission as Secondary/Level III

- Department of Public Safety – Clery Act Compliance

  Other compliance-related activity:
  - 2019 Annual Security and Fire Safety Report completed and published to the university community online on September 25, 2019
  - University community notified of report publication and availability via email on September 25, 2019
  - Westat Online Reporting of Clery Stats after ASR publication

- Division of Research (DOR)

  New protocols/policies implemented:
  - Updated the following Institutional Animal Care and Use Committee (IACUC) Policies/Guidance:
    - Toe Clipping of Mice policy
    - Tail Clipping in Rodents policy
    - Use of Non-Pharmaceutical Grade Compounds in Laboratory Animals (guidance document)

New compliance-related training programs developed:
- (Internal) – weekly training for Institutional Review Board (IRB) team members interested in pursuing Certified IRB Professional (CIP) certification and continuation education for all team members.

Compliance-related training:
- Training provided:
  o Responsible Conduct of Research (RCR): 63
  o Conflict of Interest in Research: 3
  o New IRB Member training: 9
  o New Faculty Workshop: 28
  o Institutional Review Board (IRB) 101: 42
  o ICON training – IACUC Module: 37
  o Xenopus and Zebrafish Training Presentation (guest lecturer from MD Anderson): 12
  o Administrative Oversight Training Series: 81
- Training attended by DOR staff:
  o 7/14-16/2019: National Association of College and University Business Officers (NACUBO) Annual Meeting, Austin, Texas: 1
  o 8/28/2019: Rigor and Reproducibility Publication and Reporting Workshop (GCC), Houston, Texas: 1
  o 9/5/2019: X-Ray Safety Course (UH-EHLS): 1
  o 9/10/2019: Hydrofluoric Acid Safety Course (UH-EHLS): 1
  o 9/12/2019: Laser Safety Course (UH-EHLS): 1
  o 9/16/2019 – 9/18/2019: Association of Research Integrity Officers (ARIOS) Conference, Atlanta Georgia: 1
  o 09/19/2019: Full Day Office for Human Research Protections (OHRP) Exploratory Workshop (Privacy): 5
  o 9/27/2019: Biotech Security Summit, TMC Innovation Institute, Houston, Texas: 1 (with General Counsel X3)
  o 6 compliance-related webinars: 17 attendees

Compliance audits/investigations conducted:
- External
  o 7/31/2019 and 8/14/2019: Texas Higher Education Coordinating Board, Restricted Research Committee Review, Austin, Texas (no findings)
  o 8/28/2019: Wind Tunnel Study of Technology Bridge Building 11, Ambient Air Technologies, Fort Collins, Colorado (1 finding; currently in discussion regarding mitigation strategies)
- Internal
  o 2 open Research Misconduct Investigations
  o 1 open IACUC investigation
  o 2 internal DOR audits on the new DOR Fund Transfer Authority by Threshold policy
  o 3 IRB reportable new events

o IACUC semi-annual facility inspections (inspection of all rooms where animals are housed and/or used, ~133 total)

New compliance initiatives undertaken:
- Procedure mapping for faculty startup (impacts faculty and business staff in colleges) and hiring (impacts DOR Central units)
- Award Mod approvals in PeopleSoft (PS) Grants (the process was developed/implemented after PS Grants were started, so approval of mods for awards was generated prior to the implementation)
- RD2K to PS Grants Award Migration: a plan has been developed to finish the award migration for all still-active awards that have not yet been migrated by December 31, 2019. Impacts faculty and business administrative staff in colleges and research centers
- July 12, 2019: UH Chemical Safety Committee Inaugural Meeting comprised of Faculty and Administrators – 1 DOR Attendee (11 Total Attendees – 10 from UH and 1 from University of Texas TMC)
- July 18, 2019: UH Administrative Working Group to define information needs and discuss how to obtain information at UH to satisfy the Foreign entity gifts and contracts reporting requirements – 2 DOR Attendees (13 Total Attendees from UH)

Other compliance-related activity:
- Compliance committee meetings
  - 3 Conflict of Interest Committee meetings
  - 10 Institutional Review Board (IRB) Committee meetings
  - 3 Institutional Animal Care and Use Committee meetings
  - 3 Intellectual Property (IP) Committee meetings
  - 1 UH Radiation Safety Committee meeting
- 1 Compliance Unit Standard Procedure (CUSP) meeting, as part of the Federal Demonstration Project (FDP)
- 3 Veterinary Information Sharing Activity (VISA) Meetings: ACO and IACUC veterinarians review ongoing animal-related issues and new developments in the field
- Conducted Semiannual IACUC Program Review: The IACUC reviewed the full program for animal care and use, as required by the Public Health Service (PHS) Office of Laboratory Animal Welfare (OLAW) Policy, to ensure compliance and applicability and to document changes/action items.
- Ongoing meetings/phone calls with Department of Commerce/FBI regarding intellectual property
- Review of compliance requirements for contract to external companies to use Animal Care Operations (ACO) facilities
- Ongoing iEdison reporting of inventions from federally funded research
- Updated UH Research Administrator Certification Program (RACP) modules

■ Equal Opportunity Services (EOS)

Compliance-related training:
- EOS conducted the following compliance trainings related to the Sexual Misconduct, Anti-Discrimination, and Consensual Relationship Policies to staff, faculty and students:
  o New Student Orientation (13 sessions)
  o New Hire Orientation (14 sessions)
  o Specialty Student Groups – Teaching Assistants, Resident Assistants, various graduate student departments, etc. (9 sessions)
  o Title IX-specific Training – Students (10 sessions)
  o Specialty Topics for Staff and/or Faculty (4 sessions)
  o Tabling and Outreach Events (6)

Compliance audits/investigations conducted:
- EOS continues to conduct investigations related to sexual misconduct and discrimination which affect members of the campus community
- The Electronic and Information Resources (EIR) Accessibility Coordinator is conducting a Section 508 compliance audit regarding electronic accessibility

New compliance initiatives undertaken:
- The EIR Accessibility Coordinator is collaborating on a new product roll out (Blackboard Ally) for accessibility compliance purposes across the UH System.

Other compliance-related activity:
- EOS staff attended two Title IX trainings which covered new state legislation and investigation best practices.
- The EIR Accessibility Coordinator is registering with the Texas Department of Information Resources in order to achieve designation for UH and UH System to ensure state compliance.

■ Environmental Health & Safety

New protocols/policies implemented:
- UH Guideline for Peroxide Forming Materials

New compliance-related training:
- EH06: General Laboratory Safety Orientation offered by EHS Department to persons prior to working or volunteering in research laboratory was transitioned from web-based to in-person classroom format effective September 1, 2019. To accommodate colleges and departments, the training was offered to new students in their respective colleges and departments during the month of August 2019. The training is now offered once a month with online enrollment portal.

Compliance-related training programs:
- The following training was provided by EHLS

- o Respiratory Protection: 5 people
- o Hazard Communication: 23 people
- o Safety Awareness for Police & Security: 4 people
- o Safety awareness for Non Lab Personnel: 3 people
- o Chemical Spills and Waste Procedures: 72 people
- o General Lab Safety Orientation: 335 people
- o Hydrofluoric Acid Safety: 8 people
- o Vehicle Safety Training: 17 people
- o Biological Safety/Bloodborne Pathogens: 123 people
- o Bloodborne Pathogens: 106 people
- o Bloodborne Pathogens Refresher: 23 people
- o Transport of Biological Samples: 2 people
- o General LASER Safety Awareness: 3 people
- o Laser Safety: 36 people. Refresher: 17 people
- o Radioactive Material: 22 people. Refresher: 13 people
- o Basic Radiation Awareness: 6 people
- o X-ray safety: 30 people. Refresher: 56 people
- o Asbestos Disturbance Prevention: 15   Refresher: 1 person
- o Compressed Gas Cylinder Safety: 67 people

Compliance audits/investigations conducted:
- Texas Department of State Health Services, Radiation Control Program; Inspection of UH X-ray Certificate of Registration, UH Technology Bridge Site – No violations

Other compliance-related activity:
- Received notice from the Rail Road Commission that the remediation file was being closed for the UH Coastal Center Oil spill
- Violation of Procedures for receiving and opening radioactive material packages in 25 Texas Administrative Code § 289.202 (ee). Radioactive material packages were delivered to the UH Copy, Print and Delivery Services by FedEx. All such deliveries should be to Radiation Safety Office at 4513 Cullen Blvd. for proper receipt and opening as committed to by the Broad Radioactive Material License. Arrangements are being worked out to prevent recurrence.

- ■ Finance

  Compliance audits/investigations conducted:
  - The State Auditor's Office is auditing Contracting Compliance for the University of Houston. Business processes used by the University of Houston also apply to the University of Houston System Administration.

- ■ Office of Emergency Management

  New protocols/policies implemented:
  - New UH Emergency Operations Center (EOC) Operating Manual developed

Compliance-related training:
- Emergency Preparedness Training for Residential Advisors (RAs)
- Hurricane Preparedness Training sessions (2)
- Veoci Incident Management System Training sessions (9)
- Full-scale test of the UH ALERT Emergency Notification System
- Shelter in Place/Public Address Drills held in Residence Halls
- Football Command Post Orientation & Training held
- Faculty Safety & Emergency Preparedness Symposium held

Other compliance-related activity:
- Quarterly Emergency Planning Committee Meeting held
- Annual review of UH Mass Evacuation Plan completed
- Annual review of the UH Continuity of Operations Plan (COOP) completed
- Submission of COOP Exercise documentation to the State Office of Risk Management as required on every odd-numbered year
- Annual review of TDECU Stadium Emergency Action Plan completed in conjunction with UH Athletics

■ Scholarship and Financial Aid (SFA)

New protocols/policies implemented:
- SFA's Self-Help Functional Area implemented some processing changes to eliminate inadvertent errors in the processing of Federal Parent PLUS Loans for undergraduate students. The new PLUS verification form allows staff to verify that the individual applying for the PLUS Loan is, in fact, the student's parent, as other individuals are not eligible to apply.

Compliance-related training:
- New advising staff members are required to complete cash handling training.
- Two members of the SFA leadership team attended the National Association of Student Financial Aid Administrators (NASFAA) annual regulatory conference.
- Three SFA staff members who attended the Texas Association of Student Financial Aid Administrators (TASFAA) New Aid Officers Workshop in Grapevine, Texas in late May 2019.
- SFA's Assistant Director, Compliance, successfully tested and earned NASFAA's Certified Financial Aid Administrator (CFAA) designation. He is now a member of the inaugural class of the first 100 financial aid administrators to hold this credential.

Compliance audits/investigations conducted:
- Currently participating in the annual state Single Audit of Title IV program administration
- Commenced with an internal audit of scholarship programs administered by the university

Other compliance-related activity:
- Updated and submitted the university's electronic application for Title IV (Federal Financial Aid) program participation to the U.S. Department of Education (ED) to secure continued institutional financial aid eligibility. ED's review will continue through fourth quarter.

■ Treasury

Compliance-related activity:
- Semi-Annual report to the Bond Review Board
- Quarterly Report to the Legislative Budget Board

■ Student Affairs and Enrollment Services

Compliance-related activity:
- In compliance with the Higher Education Act, the Higher Education Opportunity Act, and other applicable laws, the Dean of Students notified all enrolled students of the following institutional policies and other applicable information via email: Title IX, Consumer and Safety Information, Financial Aid Information, Student Code of Conduct, Privacy of Student Records, Equal Opportunity and Non-Discrimination. Notification took place on September 4, 2019, the official enrollment reporting/census date for the Fall Semester.
- Pursuant to the Drug-Free Schools and Communities Act Amendments of 1989, the Dean of Students distributed the UH Drug and Alcohol Abuse Prevention Policy to all enrolled students via email. Distribution took place on September 4, 2019, the official enrollment reporting/census date for the Fall Semester.
- In compliance with the Texas Education Code, the Dean of Students distributed the UH Hazing Policy, a summary of the Texas Education Code regarding hazing, and a list of organizations disciplined for or convicted for hazing on or off campus during the three preceding years to all enrolled students via email. Distribution took place on September 4, 2019, the official enrollment reporting/census date for the Fall Semester.

■ University Information Technology (UIT)

New protocols/policies implemented:
- In accordance with action items associated with the Audit Findings identified through the Schneider Downs Cybersecurity Audit, including the centralization of the UHS Information Security Program, we are continuing to implement various new protocols across all of the UHS universities.

Compliance-related training:
- Multiple information security workshops and awareness activities were held throughout the quarter for UH Information Security Officers (ISOs), faculty, staff and students.

Compliance audits/investigations conducted:
- External – IBM through an engagement with Deloitte is conducting a compliance audit of UH-utilized software licenses.
- External – UHS Information Security assisted UH Police with a CJIS Audit conducted by Texas DPS
- External – UHS Information Security assisted the Office of General Counsel with a Department of Justice audit related to Electronic Learning Management System Accessibility
- External – UHS Information Security assisted Internal Audit/Schneider Downs with an audit of the College of Education Resource Center (TERC) compliance requirements by the Higher Education Coordinating Board
- External – Schneider Downs conducted a Vulnerability and Penetration Testing audit for all UHS campuses at the direction of UHS Internal Audit
- Internal - Multiple information security investigations were conducted and closed.

New compliance initiatives undertaken:
- A College Technology Review, including an Information Security Risk Assessment were completed for the Cullen College of Engineering and the UH Law Center.
- An Information Security Risk Assessment is in progress for Marketing, Communications and Media Relations.
- Information Technology Service Assurance Reports were prepared for the following:
  - College of Pharmacy
  - College of Education
  - College of Hotel and Restaurant Management (HRM)
  - Graduate College of Social Work (GCSW)
  - College of Liberal Arts and Social Sciences (CLASS)
  - College of Natural Sciences and Mathematics (NSM)
  - Division of Student Affairs and Enrollment Services (DSAES)

Other compliance-related activity:
- During the quarter, monthly information security reports were submitted to the Texas Department of Information Resources (DIR) for the UH agency.
- UHS Information Security staff participated in multiple Texas DIR hosted meetings of the Information Security Working Group/Network Security Operations Center, the State Information Security Advisory Committee/Policy Sub-committee, and the Texas Cybersecurity Council.

■ University Marketing and Communication (UMCMR)

Other compliance-related activity:
- UMCMR is in the process of drafting and implementing divisional procedures for checking out unassigned University equipment to UMCMR employees. A divisional equipment checkout e-mail account has been created so that employees can send e-mail requests to mccheck@central.uh.edu (with a copy to their immediate supervisor) when checking out and returning unassigned equipment. The division's property custodian will manage the process and track the removal and return of all unassigned

equipment being checked out, noting and reporting any discrepancies or irregularities.
- UMCMR is currently undergoing an Information Technology Security Review administered by the UHS Information Security Department.

University of Houston-Clear Lake:

UHCL conducted their quarterly compliance meeting on September 24, 2019.

New compliance-related training programs developed:
- CITI training documentation method updated

Compliance-related training provided to staff, faculty and/or students:
- State Office of Risk Management (SORM) conducted three days of driver safety training for anyone who would be operating a UHCL vehicle. A one-day safety training class for forklift operators was also conducted. The next scheduled training will be in January 2020.
- All Residential Assistants for Hunter Hall attended a three-day orientation/job training in August 2019. Training included fire safety, dorm security, as well as administrative duties, and floor assignment duties.
- Hurricane evacuation training was conducted to familiarize student life and rec and wellness staff with the evacuation process of the residential hall in preparation for hurricanes.
- UHCL Police Department conducted six Civilian Response to Active Shooter Events (CRASE) classes during the months of July, August, and September 2019.
- UHS held a TRAM (Time Reporting and Absence Management) training session during the month of August 2019.
- Environmental, Health and Safety held CPR certification courses every Friday during July along with three courses in August 2019. EHS also conducted safety/orientation training for students, faculty, and staff working in and around animal research labs.
- Information security awareness training was conducted weekly.

Compliance audits/investigations conducted:
- Eight information security incidents were reported, investigated and submitted to the Texas Department of Information Resources (DIR).

Other compliance-related activities:
- Institutional Animal Care and Use Committee (IACUC) animal purchase procedures updated
- An information security monthly incident report was submitted to the Texas Department of Information Resources (DIR) at the beginning of each month of the quarter. Eight incidents were reported and investigated during the quarter.
- There were no legal holds associated with UHCL.

- There were no DMCA (Digital Millennium Copyright Act) copyright infringement claims submitted for UHCL.
- There were two Red Flag Rule Reports associated with a UHCL student that were reported to and followed up by UHS Information Security.
- Office of Emergency Management conducted a test of the emergency mass notification system in September 2019.
- Institutional Review Board (IRB) protocol submission policies were updated.
- Conflict of Interest certification submission forms were updated.
- Revised Conflict of Interest Certification submission procedures were posted on the OSP website.

University of Houston-Downtown:

UHD conducted their quarterly compliance meeting on September 25, 2019.

New protocols/policies implemented:
- Budget, Procurement & Contracts
  - General Procurement/Procurement Card Policy Statement 05.C.09 revised the transaction limit for federal funds from $3,000 to $3,500

- Disability Services
  - BlackBoard Ally - Program to assist in making documents accessible to students

New compliance-related training programs developed:
- UHS Information Security
  - Phishing Awareness training developed to provide more detailed information about phishing campaigns that are seen at the University
- Budget, Procurement & Contracts
  - New P-card holder/processor training – five cardholders, four received processor training
- Disability Services
  - Trainings related to BlackBoard Ally in partnership with IT and Title IX/ADA University Coordinator
- Business Affairs
  - Training in PeopleSoft Campus Solutions for users in the Student Financials portion of the system

Compliance-related training provided to staff, faculty and/or students:
- UHS Information Security
  - Information Security Awareness presented at each New employee orientation by the Information Security Officer
  - Phishing Awareness - requested by Ivonne Montalbano for the ESO group and presented by the Information Security Officer

- Budget, Procurement & Contracts
  - Due to GASB 84 SAM 03.G.02 was updated and the use of Agency Funds in all ledger nine cost centers is being reviewed on campus during 998 FY19 adjustment period in September. New cost centers are being created where appropriate and departments are being notified
- Disability Services
  - Trainings related to BlackBoard Ally in partnership with IT and Title IX/ADA University Coordinator
- Employment Services & Operations
  - New Employee Training – 89% completion rate
  - Search/Screening Committee Trainings – 31
- Office of Title IX/Equity & Diversity
  - New Student Orientations – Title IX in-person training
    - Also began the Salutations online training for new students
  - New Employee Orientation Training – Title IX in-person training for new faculty and staff members

Compliance audits/investigations conducted:
- UHS Information Security
  - External audit: Schneider Downs conducted a Vulnerability and Penetration Testing Audit for all UHS campuses at the direction of UHS Internal Audit
- Emergency Management
  - July 9, 2019 – Pre-occupancy fire safety inspection of new Science & Technology Building (STB) with State Fire Marshal's Office
  - August 15, 2019 – Shea Street Building at UHD lost power and was evacuated for approximately 18 hours due to fire in a transformer and an HVAC motor. The cause was determined to be accidental by the State Fire Marshal's Office.
- Employment Services & Operations
  - Investigations Conducted – 10
- Office of Research & Sponsored Programs
  - National Science Foundation Office of Research Integrity UH System audit – ongoing
  - Joint Admissions Medical Program Audit – ongoing
  - External audit of the UHD/HEART audit on behalf of Houston Galveston Area Council
- Financial Aid
  - Internal audit of Scholarships by UHS Internal Audit
- Office of Title IX/Equity & Diversity
  - Title IX and Anti-discrimination investigations – 22

New compliance initiatives undertaken:
- Emergency Management
  - August 25, 2019 – Audit of Exit Sign placement inside of the One Main Building. Preparing Corrective Action Report to comply with Life Safety Code 101
- Office of Title IX/Equity & Diversity
  - Blackboard Ally

Other compliance-related activity:
- UHS Information Security
  - Monthly information security reports were submitted to the Texas Department of Information Resources (DIR) for UHD
  - Red Flag Rule Reports: A total of four inquiries for UHD were reported to UHS Information Security
- Public Safety
  - The Annual Security Report for Clery posted September 30, 2019
- Office of Title IX/Equity & Diversity
  - State Senate Bill 212 and 1735 add additional reporting requirements for Title IX.
    - Now requires a quarterly report to University President and the Board of Regents. Will also be a misdemeanor crime if an employee fails to report an incident of sexual misconduct, and per the new law will require termination

University of Houston-Victoria:

UHV conducted a Safety Committee meeting on July 30, 2019.

New compliance-related training programs developed:
- Emergency Management
  - Created a new annual shuttle driver training-first year for introduction August 2019
  - Created new training for dining services staff – August 2019
  - Dining services staff – 2019/2020 additional training at the Christmas/Spring break discussed for staff
  - Attended new training for police officers teaching the perspectives of surviving police work on and off duty and the effects to their relationships
  - Attended the Train the Trainer Course for Emergency Management in Emmitsburg, Maryland

Compliance-related training provided to staff, faculty and/or students:
- Emergency Management
  - Cardiopulmonary resuscitation (CPR) and First Aid for the Resident Assistants (RA)
  - CPR and First Aid for Soccer Coaches
  - RA Training Blood Borne Pathogens
  - RA Training-Active Shooter
  - RA Training Fire Alarms and Fire Safety
  - Upcoming training with local emergency management: Managing Critical Incidents for Higher Education, A Multi-Disciplinary Community, hosted by Texas Emergency Management at UHV
- Facilities Services
  - New Employee Orientation – 7/16/19: 1 employee
  - Defensive Driving – 9/17/19: 1 employee

- Finance
  - One-on-one PeopleSoft Finance Applications Trainings: 27 staff trainings
  - One-on-one Other Various Finance Applications Trainings: 2 staff trainings
- Financial Aid
  - The following training webinars and conferences were attended by Financial Aid Staff members:
    - The Financial Aid Accountant attended the Texas Association of State Senior College and University Business Officers Conference.
    - The Financial Aid Accountant and Senior Secretary attended the Tackling Default Prevention One Month at a Time webinar
    - Two Financial Aid Specialists attended three Web Accessibility webinars: Captioning the 3Play Way, Ineligible to Eligible, and Digital Accessibility Landscape
    - A Financial Aid Assistant completed the Fundamentals of Federal Student Aid Administration training module
    - The Financial Aid Compliance Manager attended three webinars: Direct Loan Fee Swap, Financial Aid Roll Over Common Practices and the Federal Loan Entrance/Exit Counseling webinars
    - The Senior Financial Aid Specialist attended the Emotional Intelligence webinar and the Managing Student Employees webinar.
    - A Financial Aid Specialist completed the Texas Higher Education Coordinating Board Student Financial Aid Program webcast and the Federal Loan Entrance/Exit Counseling webinar.
    - The Veteran's Affairs certifying official attended the Forever GI Bill webinar, Compliance Survey webinar, VA Once of Higher Learning Computer program webinar, and the Hybrid Training for Section 305 webinar.
    - The Financial Aid Director attended the Loan Rehabilitation webinar and a Sharpening Your Skills for Tough Conversations webinar.
- Human Resources/Title IX
  - New Employee Orientation – Faculty 8/21/19:   15 attendees
  - New Employee Orientation 9/17/19: 11 attendees. Agenda included presentations on Human Resources policies, Title IX Sexual Misconduct policy C-12 and Discrimination and Harassment policy C-22; Behavioral Assessment Team, Bystander Intervention, FERPA, PeopleSoft access, mandatory training, Continuity of Operations Plan, campus lock down, Emergency Management, shelter in place, fire alarm evacuation procedures, FEMA training for designated employees, Introduction to Suicide Prevention and Wellness. Presenters by the President, Departments of Human Resources, Payroll, Institutional Compliance, Campus Safety, Training and Development, Records, Athletics, Advancement, Information Technology, Resident Life, Counseling and Staff Council.
  - Ongoing faculty, staff and student training sessions on Sexual Misconduct Reporting including advanced training for student workers with safety planning modules
  - Ongoing New Employee Orientation including anti-discrimination overview and accessibility updates in addition to standard employee on-boarding hosted in coordination with Training and Development.

- o Title IX Refresher training series deployed for any employees who have completed mandatory training since November 2017 featuring updates and employee Q&A.
- o Online training and education included website updates with new sections for criminal justice information, academic support services and prevention education digital campaign materials.
- o Advisory Committee for Technology Accessibility continues to meet monthly to support campus-wide initiatives including Blackboard Ally, Association on Higher Education and Disability (AHEAD) virtual conference, SiteImprove website monitoring and employee training.

Compliance audits/investigations conducted:
- Emergency Management
  - o Stop work order issued in new construction area for "failure to wear personal protection equipment (PPE)." Fire Marshal issued corrective action and work resumed.
  - o Stop work order issued during freshman move-in. Roofers ordered to stop operations. Confirmed by the Facilities Director.

- Financial Aid
  - o The 2019 Fiscal Year Compliance Survey and Audit of Veterans Affairs beneficiary records was completed and no findings were reported.
- Human Resources/Title IX
  - o Ongoing reports of sexual misconduct and discrimination pending investigation and support services
  - o Two-year website audit completed to log general usage and trends

New compliance initiatives undertaken:
- Emergency Management
  - o Created position and hired an Environmental Health and Safety employee to assist with Lab Safety
  - o Fire alarm failure at Jaguar Hall initiated a fire watch until the system was operational
  - o Monthly safety meetings held for Facilities department. Various topics presented to comply with Occupational Safety and Health Administration (OSHA) and State Office of Risk Management (SORM) standards.

Other compliance-related activity:
- Emergency Management
  - o Hosting local fire department to walk through newly opened University Student Commons (USC) building for their awareness with the new construction site. Focal points included fire alarms, fire sprinklers, fire pumps, fire lanes, and access to the building and identifying challenges with new construction
  - o Conduct monthly inspection of fire extinguishers in campus buildings and vehicles
- Financial Aid
  - o All sections of the Financial Aid Manual were updated for the 2019-2020 award year.

- Policies Updated within the quarter:
  - A-28 Condolences and Congratulations
  - B-2 Expenditure/Revenue Reallocations, Reimbursements or Corrections
  - B-11 Manually Produced Checks
  - B-14 Sales/Use Taxes, Etc.
  - E-1 Purchasing
  - F-2 Business Use of Vehicles

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Don F. Guyton
System-wide Compliance Officer
October 9, 2019