UNIVERSITY OF HOUSTON SYSTEM
INSTITUTIONAL COMPLIANCE STATUS REPORT
For the three months ended September 30, 2011

Institutional compliance activities at each university during the three months ended September 30, 2011, are as follows:

Activity	UH/UHS	UHCL	UHD	UHV
Risk Assessments Completed	0	0	1	0
Risk Assessments Updated	2	4	0	59
Compliance Audits Conducted	45	0	1	2
Compliance Committee Meetings Held	1	1	1	1
Risk Mitigation Implemented:				
Specific Control Activities (pol. & proc.)	20	39	1	32
New Training Program / Activities	51	65	0	24
Hot-line Reports:				
Number Received during last 3 months	3	1	2	0
Reports Resolved during last 3 months	3	0	2	0
Unresolved Reports as of Sept. 30, 2011	9	1	2	0

UHS:

- A system-wide meeting of the Institutional Compliance officers was held on July 13, 2011, to discuss institutional compliance activities. Included on the meeting agenda were the following:
  - Open points from previous meeting
  - Review of reports to be presented to the Audit and Compliance Committee on August 17, 2011
  - Cooperative Problem Solving – Sharing of Ideas (discussion by all compliance officers of major concerns / accomplishments)
  - Presentation by Mike Glisson – Annual Verification of Finance Security and P-Card/Travel Card Users
  - Presentation by Laurie Ruiz – Implementing the Higher Education Opportunity Act
  - Presentation by Valerie Coleman-Ferguson – S.B. 1327
  - Presentation by Joan Nelson – HR Hot Topics
  - Presentation by Anne Sherman – Update on Research Hot Topics

- Changes in laws and regulations:
  The Audit and Compliance Committee charter and checklist (item #16) requires the committee to review legal and regulatory matters that may impact internal auditing and / or compliance activities. During the last two legislature sessions, the Texas Education

Code was modified to require higher education institutions to adopt and implement a multihazard emergency operations plan. The plan must include processes for employee training, mandatory drills for students, faculty and staff, measures for coordinating with state and local emergency management and law enforcement agencies and the implementation of a safety and security audit every three years. The audit report must be submitted to the Board of Regents and the division of emergency management of the office of the governor. The first audit report is scheduled to be presented to the Board of Regents at the November 2012 meeting.

UH:

Finance

UH departments completed their annual review and verification of the following:

- Employee access to the Finance and HR Systems is appropriate and necessary, including any authority they have to approve documents or requests within the systems
- Employees with long distance calling codes and credit cards still need them to make university-related long distance phone calls
- Employees with P-Cards and Travel Cards still need them for university-related purchases and travel expenditures

UH departments also submitted revised Baseline Standards and Cash Handling Procedures to General Accounting for review. Baseline Standards indicate who is responsible for creating, approving, and overseeing various administrative tasks to ensure that internal controls are adequate and there is a separation of duties. Cash Handling Procedures indicate the departmental procedures followed to receive, safeguard, and deposit currency and checks.

UH departments with university property that is taken off-campus, such as laptop computers, submitted their "Request for Authority to Remove Equipment from Campus" form to Property Management. The form indicates who is responsible for the equipment and where it will be located. This annual process ensures that off-campus equipment is authorized for removal by the department.

Purchasing

A presentation was made on Sept. 9th, 2011, to the Bauer College regarding purchasing policy requirements.

Public Safety

The 2010 Annual Campus Security and Fire Safety Report as required by Title 20 U.S.C. 1092(f), also known as the "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act," is now available.

The University of Houston's Annual Security and Fire Safety Report includes:

- Statistical data for the previous three years concerning reported crimes that occurred on-campus; in certain non-campus buildings or property owned or controlled by the

University of Houston; and on public property within, or immediately adjacent to and accessible from, the campus.

- Statistical data for the previous three years concerning fires occurring in residential facilities, fire safety amenities in residential facilities and policies related to fire safety and residential facility evacuation.
- Institutional policies concerning campus security, and beneficial information for the campus community about safety and security on campus.

Environmental Health and Safety

Training

Recombinant DNA training (5 Times)
Infectious Substance Shipping (2 Times)
General Laboratory Safety (4 Times)
Hazard Communication (2 Times)
Biological Safety (4 Times)
Bloodborne Pathogens (12 Times)
N95 Respirator Fit-test (6 Times)
Air Purifying Respirator Fit test
Radioactive Material Safety (3 times)
X-ray Safety (3 times)
Laser Safety
Hydrofluoric Acid Training
Chemical Standard Operating Procedures
Online Annual X-ray Safety Refresher
Online Annual Laser Safety Refresher
Online Bloodborne Pathogens Refresher
Online Hazardous Waste
Online Radioactive Material Refresher
Online Environmental Compliance

New Programs/Activities

Coordinated permit application process for new boilers at Central Plant and secured new permit within this quarter
Coordinated stack testing at Recreation Center and sent results to TCEQ which closed an overdue item
Developed Equipment Decontamination Release Form

Regulatory Reports/Actions

Responded to TCEQ request for information concerning emissions event
Registered 3 previously unknown grease traps and 2 related lift stations per the City of Houston Requirements

Residential Life & Housing:

Compliance with Texas Education Code, Sections 51.9192 and 51.9193 – Bacterial Meningitis

- Emailed incoming fall 2011 residents a message informing them about the immunization requirement, instructions for completing and submitting the forms and gave them a deadline of July 15
- Mailed postcards to incoming residents reminding them of the immunization requirement for living on campus
- Called incoming residents who had not submitted their immunization requirement on a weekly basis during the month of July
- Included a statement on the online application site that the student had to acknowledge that they were informed of the state law regarding the immunization requirement for living on campus
- Reminder note was included in the student's room assignment email and the letter in the move-in packet that was mailed to residents
- The immunization requirement was included in our housing brochure and also the housing website. The housing home page had an easy link to the immunization forms required by the UH health center
- Our marketing team informed students and parents attending the summer orientation conferences about the immunization requirement during "tablings" and their presentations

FERPA

- Photo release forms were signed and collected from UH students whose photographs we took during August move-in
- RAs underwent a training segment during August RA Training to review F.E.R.P.A. and privacy issues

Compliance with the Higher Education Act of 2008

- During August move-in residents were asked to voluntarily provide emergency contact information (toward aiding the Missing Student Protocol)

Division of Research

- Completed the semi-annual inspections for animal care facilities at UH.
- Completed the semi-annual program review of the animal care program at UH.
- Conducted training classes each month of the quarter pertaining to animal care.
    - Introduction to Laboratory Animal Science
    - Practical Research Methodology – Rodents
- Conducted one (1) classroom presentation pertaining to human subject research: An Introduction to Human Subject Research.
- Conducted Research Administrator Certification Program (RACP) class entitled, "The Academic Environment".
- Each month of the quarter, we completed full committee meetings and subcommittee meetings for both Committees for the Protection of Human Subjects (CPHS).

- Prepared and submitted the reports required on our ARRA grants to the federal government.
- Began transition to an electronic system for CPHS applications.

University Information Technology

Sensitive Data Protection –

- Identity Finder Deployment – All campus departments are working on identification and remediation of sensitive data with a goal of 100% scanning of UH-owned computers by 12/31/2011.

- New MAPP 10.05.03 – Data Classification and Protection – On Sept. 6, 2011 Dr. Khator signed the new MAPP which provides specific direction regarding the appropriate classification of university data and the corresponding safeguards. UIT will be working to educate campus users on the provisions of this new policy. UIT will also be working with campus departments to document their data control plans in accordance with the new MAPP.

TAC Compliance –

- MAPP 10.03.06 – UIT has implemented a certification program for the Information Security Officers (ISOs) appointed by all UH Colleges and Divisions. To be considered a "certified ISO", individuals must meet 3 criteria: 1) Be officially appointed by a UH college/division 2) Complete the UIT hosted ISO workshop which details the ISO roles and responsibilities and 3) Demonstrate formal knowledge of Information Security concepts through completion of one of the following: 3-day Info Security & Risk Management Foundations course, CISSP certification or Master's Degree in an Information Security related field. To date, 11 UH ISOs have completed the certification requirements.

- Update of UH IT SAM/MAPPs – The campus review process is continuing for the updates to the Information Technology MAPPs. Two MAPPs have been approved: 10.05.02 and 10.05.03. Three MAPPs are still in review: 10.03.01, 10.03.04 and 10.05.01. UIT is working with Administration and Finance regarding updates to 10.03.05. UIT is working with OGC regarding updates to SAM 07.A.05.

- Employee Awareness Training – UIT worked with HR to update the Secure Our Systems Mandatory Training for FY12.

- Student Awareness Training/Acknowledgment – UIT worked with Enrollment Services to implement a requirement in myUH (PeopleSoft) for all students to acknowledge awareness of UH information security policies each semester. The Computer Security Awareness Training for Students (CSATS) was also updated and is available to all students.

- TAC Changes - UIT is participating in the Texas Department of Information Resources (DIR) review process regarding potential changes to TAC requirements in the areas of Accessibility and Data Encryption.

Red Flag Rule Notifications: Employees and students receive an automated email notification when they change their email address, physical address, W-4 withholding, or direct deposit information. Between July 1st and September 30, 2011, University of Houston IT Security received 23 inquiries about automated email messages related to email and physical address changes. 18 reports involved the UH campus. None of the inquiries were identified to be security incidents.

UHCL:

- UHCL Compliance meeting was held on August 11, 2011 with business consisting of:
  - The minutes of the June 2, 2011 meeting were approved with correction of Kevin Barlow for Simone Tiu.
  - Based on goals for FY 2011 the committee decided on the following Risk Assessment assignments for FY 2011 as:
    - Laboratory audits – updates
      - Facility deficiencies:
        - 40 eyewashes contracted for installation
        - 7 – 9 hood failed of 39 hoods, with 6 hoods with flow-meter issues reported to AVP for funding request.
        - 1 additional safety shower is needed
      - Training, PPE, Labeling
        - Lab training and Hazard Communications greater effort on compliance needed in 37 of 37 labs – video under review for library
        - PPE - Working on easier access to purchasing lab coats and goggles in 28 of 28 labs – list of PPE for classes completed.
        - Labeling – Additional labeling and secondary containment for chemicals needed in 23 of 31 labs – new labels printed.
    - Property Handling - updates
      - General Accounting website being updated for Policies and Procedures by November 2011.
      - New Property Custodian training completed and on-going for new property custodians.
      - Random physical inventory audits completed with 100% assets found.
  - Based on goals for FY 2012 the committee decided on the following Risk Assessment assignments for FY 2012 as:
    - ADA
      - Staff and Students
      - Transportation
      - Facilities (Cashier gate and Lot B)
    - Study Abroad
    - Financial Aid

- Citibank P-card – one time report.

UHD:

- The quarterly UHD Compliance Committee Meeting was held on September 14, 2011. Items on the agenda included the following:
  - Reviewed actual performance versus FY11 goals reported to the BOR
  - Review of FY12 goals reported to BOR
  - Risk Assessment update
  - Subject Matter Experts presented reports on identified institutional risk areas
  - Presentation on Business Affairs Summer Reading Program
  - Open discussion

- Risk Assessment
  - 4 identified institutional level risks now reduced to 3
    - H1B Processing/Hiring International Students – Resolved and downgraded to High/Low with the UHS 8/1/11 hiring of Immigration Specialist
    - Of the remaining 3:
      - Laboratory/chemical issues – New procedures being developed.
      - IT data issue – On hold pending hiring of IT compliance personnel
      - Financial Aid issue – To be addressed this quarter due to heighten activities associated with government delays in determining available financial awards

- Promoting Compliance and Compliance & Ethics Website
  - Highlights of the Compliance and Ethics Website were presented during the Administrative Reference Manual training for the Department Business Administrators. (http://www.uhd.edu/facultyandstaff/administrativereferencemanual/) Presentation included specific sections that provide helpful information both globally for the employee and specifically for the job position.
  - George Anderson: Business Affairs Summer Reading Assignment
    - Visit the UHD Compliance & Ethics Web Page
    - Read the President's Letter
    - Watch the My Safe Campus presentation
    - Read through the Employee Compliance and Ethics Guide
    - Scan through the rest of the site
    - Report to me that you have completed
    - Send ideas of what we can do to promote a Culture of Ethical Behavior for BAG and UHD

    All Business Affairs employees participated. Unrequested feedback was very positive.
  - Administration and Finance Office hosted the "Social Media" webinar sponsored by SORM. The webinar discussed current trends in social media, reviewed key legal

issues and employment related risks, discussed the use of social media in conducting employment related background checks, and identified best practices

- Information Technology Compliance Report for BOR – July through September 2011
  - TAC 202 Security and Compliance Activities
    - UHD IT continued monitoring university systems and electronic assets for security risks and events throughout the reporting period. Monthly security reports were prepared and submitted, as required by TAC 202, to the Department of Information Resources and a fiscal quarter roll up was provided to the UHD Compliance Committee.
    - UHD IT worked with application owners to complete the annual IT Risk Assessment for Information Systems during the 4th fiscal quarter. The Risk Management Plan for FY10-11 was finalized and approved by the UHD President in July 2011.
    - The FY11 user access reviews were completed as required biannually for all information resources in August.
    - UHD IT underwent a biennial review of TAC 202 compliance by the UH System Internal Audit Office in August and hosted an onsite audit of security and safety compliance of both the One Main Building and Shea Street Building Data Centers in September.
    - UHD IT Compliance Office staff completed the annual review and update of the University's Information Technology Detail (ITD) through the Legislative Budget Board's ABEST system in August and per Section 2054.103 of the Texas Government Code, submitted an electronic copy of the approved *2012-2013 Biennial Operating Plan* to the Office of the Governor (miscreports @governor.state.tx.us), State Auditor's Office (submitreports@sao.state.tx.us), and the Department of Information Resources (BOP_submission@dir.texas.gov).

- Audit Report 2009-20 Activities
  - Action Item 3b, Work with university leadership to update UHD's Business Continuity Plan to include all business functions of the University.

    STATUS

    UHD's University-wide business continuity plans were signed by UHD President, Dr. William Flores, on April 15, 2010, but a subsequent review by UH System Audit resulted in a request for UHD to prepare a Business Impact Analysis, Security Risk Assessment, and Recovery Strategy, as well as develop an implementation, testing, and maintenance program at the university level. The estimated completion date for these additional activities related to UHD's Business Continuity Plan was August 31, 2011. During the 1st fiscal quarter, the Vice President for Administration communicated with and provided materials to the Executive Council for review and comment, and proposed the approach for conducting the update for FY11. The Executive Council's review of materials provided at the end of the 1st fiscal quarter continued during the 2nd fiscal quarter with the kickoff for the BCP Update Project planned during the 3rd fiscal quarter. Significant progress was made in the development of the FY11

BCP during the 3rd fiscal quarter. During the 4th fiscal quarter, UHD IT worked with the Administration and Finance Division Director to finalize University-Wide Business Continuity Plan activities. The activities culminated with a Table Top exercise that provided a comprehensive review of the recovery priorities for all academic and business units of the university in the event of a disaster. Consolidation of the Business Impact Analysis spreadsheets for each of the UHD Divisions occurred in September and the documentation for formal closeout was gathered. This action item is now complete.

- Other

  - UHD is required to send detailed information regarding policies, procedures and penalties regarding digital copyright laws to its students every semester. In July, for the Summer Sessions I, II and II of 2011 and again in September for Fall 2011, UHD IT sent an email to all students after the last day of late registration. This requirement stems from the Higher Education Opportunity Act (HEOA) of 2008, also referred to as H.R. 4137, which was signed into law on August 14, 2008. The HEOA primarily addresses obstacles that make it difficult for qualified students to obtain a college education, but it also includes specific statements requiring colleges and universities to comply with digital copyright laws.

UHV:

Notable activities for the quarter included:

- Quarterly campus Compliance Committee Meeting was held on August 31. Minutes posted online at http://www.uhv.edu/Compliance/meetings.aspx
- Committee appointment membership approved by new UHV President Dr. Philip Castille.
- Financial Aid reported the Veteran's Affairs Audit was completed and the two minor findings have been resolved.
- Financial Aid reported the State Auditor's Office completed review of the two prior year findings. Reported that UHV is now in compliance and determined that corrective action had been taken for prior year findings.
- Annual review of Master Risk Assessment Matrix completed by Business Services, Finance, Campus Safety, Facilities, Finance, Provost, Research Administration, University Advancement, Student Life & Services, and Special Events. Total of (59) departmental assessments reviewed and updated.
- Continued updating institutional polices and to view click on this link, http://www.uhv.edu/fin/policy/Policies_Procedures.aspx
- Athletics -reviewed and revised student athlete handbook and developed new UHV athletic NAIA eligibility guidelines. Beginning fall 2011 all student athletes, including freshmen, must have 2.0 GPA to be eligible to participate in athletics the following semester.
- Financial Aid updated the Consumer Information Notification and distributed a link to the information to the student list serve.

- SACS Reaffirmation of 2014, UHV introduced the new Office of Institutional Effectiveness (OIE) for the purpose to coordinate existing accreditation standards guiding the academic schools and to ensure that institutional mechanisms are in place for the collection of data necessary for the upcoming Southern Association of Colleges and Schools (SACS) visit.

This summary is taken from a more comprehensive campus report of compliance activities. To see the full report, go to: http://www.uhv.edu/Compliance/manual/reports.aspx (Scroll to UHV Campus Reports, click on Quarterly Report, Period Ending September 30, 2011).

Don F. Guyton
System-wide Compliance Officer
October 19, 2011