



CHAPMAN UNIVERSITY
Compliance Matrix

(Key federal laws and regulations governing universities)

Compliance Areas	Cognizant Senior Staff	Functionally Responsible Office	Compliance Partners	Compliance Risk Areas	Representative Law, Regulation, Requirement
Academic	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	Office of the Provost, Office of Diversity, Equity, and Inclusion	Vice President of Undergrad Ed, Provost of Graduate Ed, Deans and Department Chairs, Legal Affairs, and Faculty Advancement	Faculty appointments, Promotions, Tenure, Discipline, Non-Discrimination in Academics, Payroll and Privacy issues	Civil Rights Act (e.g., Title VI, VII and IX), FERPA, ADA
Accreditation	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	Institutional Effectiveness	Deans, Department Chairs, Vice Provosts, and Vice Presidents	University Accreditation, Quality Enhancement Plan	HEOA and Programmatic Accreditation
ADA	<i>CHRO</i> Brenda Rushforth <i>VP for Student Affairs/Dean of Students</i> Jerry Price <i>VP for Diversity, Equity, and Inclusion</i> Reg Stewart <i>VP Campus Planning and Design</i> Collette Creppell	HR, Student Affairs Office of Diversity, Equity, and Inclusion, Campus Planning, Disability Services	Office of the Provost, Property Management, Strategic Marketing (website), and IS&T	Access to buildings, accommodations in courses and the workplace, Website Accessibility, Digital Access	Americans with Disability Act (ADA)Section 504 Accommodations, Fair Labor Housing, State laws



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Admissions	<i>VP and Dean of Enrollment</i> Mike Pelly	Office of Admissions	Deans, Financial Aid, Registrar, and Office of Diversity, Equity, and Inclusion	Eligibility for Title IV funds, Diversity, Non-Discrimination	ADA, FERPA, USERRA, Title IV/IX, HEOA, Veterans programs, Program Integrity Rules on Misrepresentation and Incentive Pay, State laws
Athletics	<i>EVP/Chief Advancement Officer</i> Matt Parlow	Athletics	Administration, Registrar, Financial Aid, Student Affairs, Risk Management, Vice Provost of Grad Ed (limited), and Office of Diversity, Equity, and Inclusion	Gender equality, recruiting, records, camps, NCAA compliance, Protection of minors	Title IX, Equity in Athletics Disclosure Act, FERPA, NCAA compliance, SCIAC rules
Bond Financing	<i>EVP/COO</i> Harold Hewitt	Financial Services	Campus Planning, Deans, and Legal Affairs	Private space use	IRS Safe Harbor Contract Rules (Rev procedure 97-13 and Revenue Procedure 2007-47)



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Bookstore	<i>EVP/COO</i> Harold Hewitt	Academic Operations, Information Systems & Technology	Bookstore, Deans, Operations Directors, Faculty, IS&T and Provost Office	Textbook information implementation	HEOA - Textbook
Cadavers	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	Crean College of Health and Behavioral Sciences	Dean, Faculty, EH&S, and Legal Affairs	Treatment and handling of cadavers	Contractual stipulations, State and Federal laws
Campus Safety	<i>EVP/COO</i> Harold Hewitt	Public Safety	EH&S, Housing and Dining, Parking, Risk Management, Fire Safety, and Office of Diversity, Equity, and Inclusion	Policing campus, crime reporting, building security, investigations, Building capacity, max. occupancy	Clery Act, VAWA, HEOA, Campus Sex Crimes Prevention Act, Title IX, California Corporate Code, Building Code, Fire Code



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Conflict of Interest (Board members and key personnel)	<i>EVP/COO</i> Harold Hewitt	Office of the EVP/COO	Audit committee of the Board of Trustees, Deans and Key personnel, Institutional Compliance	Gifts, Stocks, Business Ownership, family relations	IRS Regulations for Non-profits, State Law, California Corporate Code, 990 form.
Conflict of Interest (Research Faculty)	<i>VP</i> <i>Office of Research</i> Martina Nieswandt	Office of Research Integrity	Faculty, Legal Affairs and Provost Office	PI - Financial disclosures, improper influence over research or other decisions for financial, reputational, or personal gain; self-dealing; nepotism	PHS, NSF, HHS regulations and other funding sources
Construction and Campus Planning Contracts	<i>EVP/COO</i> Harold Hewitt <i>VP Campus Planning and Design</i> Collette Creppell	Campus Planning Facilities Management	Purchasing, Legal Affairs, Risk Management (insurance), and Office of Diversity, Equity, And Inclusion	Competitive bids Purchase orders Contracts	ADA, Competitive bids, Purchase orders, Contracts, Fair Labor Housing



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Donor Gift	<i>EVP/COO</i> Harold Hewitt <i>EVP/Chief Advancement Officer</i> Matt Parlow	University Advancement	Financial Services, Investments, Legal Affairs, Financial Aid, Strategic Marketing and Communications, and Office of Diversity, Equity, and Inclusion	Explicit donor instructions on how funds can or cannot be spent, IRS regulations on gifts and endowments, state regulations on solicitation, Art gifts	State registration requirements, UPMIFA, Donor advised fund (DAF) and Family Foundation Requirements, Gift Agreement terms, IRS regulations, CAN-SPAM
Emergency Preparedness	<i>EVP/COO</i> Harold Hewitt	Public Safety	Risk Management, Facilities Management, and Sodexo	Reputational risk, Emergency Operations Plan, Evacuation Drills, Training, Food and water inventory, Crisis communication	Emergency Planning and Community Right Act (EPCRA), Clery Act, HEOA, FERPA, Contract stipulations
Environmental Health and Safety	<i>EVP/COO</i> Harold Hewitt	Enterprise Risk and Safety	Office Of Research, EH&S, Fire & Safety, Campus Safety, Strategic Marketing and Communications and Student Health Center	Lab safety, Controlled Substances, Building and Fire Codes, Workplace Safety, Waste Management, Biosafety, Occupational Health, Communicable Diseases	OSHA, CERCLA, Toxic Substance Control Act, Clean Air Act, Clean Water Act



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Equity, Diversity and Affirmative Action	<i>CHRO</i> Brenda Rushforth <i>Vice President of Diversity, Equity, and Inclusion</i> Reg Stewart	HR Office Of Diversity, Equity, and Inclusion	Deans, Department Chairs, Student Affairs, and Institutional Effectiveness	Discrimination in hiring practices, Sexual harassment in the workplace, Cross Culture Center	Age Discrimination Act, EO 11246 (AA) Equal Pay Act, Title IV, VII, IX, Fair Housing Act, Pregnancy Discrimination Act
Export Controls	<i>VP Office of Research</i> Martina Nieswandt	Office of Research Integrity	All faculty and staff with research responsibilities, Global Education, HR, Information Security, and Legal Affairs	Publication restrictions on research, sending unpublished materials to foreign countries	ITAR, EAR, OFAC
Extended Education	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	Academic Administration	Deans, Financial Aid (Advising), Financial Services, Legal Affairs, and Registrar	Scheduling of classes, payment, credit hour determinations	State and Federal Laws HEA



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Federal Contract and Grant Management Reporting (Pre/Post Award)	<i>VP Office of Research</i> Martina Nieswandt	Department of Sponsored Projects Services	Principal Investigators (PI), Deans, Department Chairs and administrators, Legal Affairs, HR, Financial Aid, Financial Services, Provost, Budget, Campus Planning, and Facilities Management	Award requirements, Effort reporting, financial reporting, Allowable expenses	OMB Uniform Guidance FAR Government suspension and debarment listing
Financial Aid	<i>VP and Dean of Enrollment</i> Mike Pelly	Financial Aid	Registrar, Cashier, Admissions, Athletics, Payroll, and Financial Services	Eligibility for financial aid, Required reports to DOE	Title IV, FERPA, HEOA, State laws
Financial Services (Escheatment)	<i>EVP/COO</i> Harold Hewitt	Financial Services	Deans, Department Chairs, and Student Affairs	Escheatment	State Laws



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Financial Services (Procurement)	<i>EVP/COO</i> Harold Hewitt	Financial Services (Purchasing)	Deans, Department Chairs, Controller, Legal Affairs, Office of Research, IS&T (Software and Hardware), and Office of Diversity, Equity, and Inclusion	Purchasing policy, allowability of expenses, Supplier Diversity	Procurement services, Government suspension and debarment listing
Financial Services (Student Business Office)	<i>EVP/COO</i> Harold Hewitt	Financial Services (Student Business Office)	Athletics, Registrar, Financial Aid, Admissions, and Residence Housing (students)	Refunds of federal funds, tax documents	Title IV
Graduate Programs	<i>VP Office of Research</i> Martina Nieswandt	Office of Research & Graduate Education	Financial Aid, Registrar, Legal Affairs, and Office of Diversity, Equity, and Inclusion	Privacy, Diversity, Non-discrimination, out of state activity	ADA, FERPA, USERRA, Title IV/IX, HEOA, Veterans programs, program integrity rules on misrepresentation and incentive pay, State laws



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Human Resources	<i>CHRO</i> Brenda Rushforth	HR	Financial Services, Legal Affairs, Financial Aid, and Office of Diversity, Equity, and Inclusion	Employment benefits, leave, Personnel policies, recruiting, Termination, training, Federal work study, Independent contractor, Diversity, Equity and Inclusion	EEOC (Civil Rights Act Title VI) FLSA, Drug Free Workplace Act, Immigration and Nationality act, Labor Management Relations Act, OSHA, Social Security Act, Title VII, Executive compensation, ADA, HEOA, ERISA, COBRA, Worker's compensation, FMLA, Executive Order 11246, E-Verify, Affordable Care Act, FAR, JOLTS
IS&T	<i>VP/Chief Information Officer</i> Helen Norris	Information Systems & Technology	Information Security, Office of Research, Legal Affairs, Financial Services, HR, and Office of Diversity, Equity, and Inclusion	Privacy, access controls for systems with students and employee data, virus/hacking prevention, Data handling, Business Continuity	FISMA, FERPA, GLBA, HIPAA, PCI DSS, Patriot Act, CAN-SPAM, DMCA, HEOA, No Electronic Theft Act, FAR, State laws and Civil Code
International - Immigration Issues	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard <i>EVP/COO</i> Harold Hewitt	Faculty Advancement, HR, Financial Services, Office of Research, Office of Diversity, Equity, and Inclusion	Admissions, Student Affairs, and Legal Affairs	Foreign scholars and students; Visiting artists and lecturers, Employment visas; Application of tax treaties to payment to above, Diversity and Inclusion	Immigration and Nationality Act; Mutual Education and Cultural Exchange Act; SEVIS regulations; I-9 instructions and regulations, Export Controls, ITAR, EAR and OFAC



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IPEDS and External Reporting	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	Institutional Effectiveness	Registrar, Financial Aid, Financial Services, Student Affairs, VP of Graduate Education, and Strategic Marketing	Collection and reporting of data to the Dept of Ed, US News, or Higher Education Associations	Title IV of HEA, Federal and State reporting
Media Rights	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard	College of Performing Arts, Student Affairs, Dodge College	College of Performing Arts, Student Affairs, Dodge College, University Advancement, (Strategic Marketing Communications), IS&T, and Legal Affairs	Blanket Music Rights Script and Digital Rights	Copyright (Music and Film), Federal and State Laws, Private contracts
Minors on Campus	<i>EVP/COO</i> Harold Hewitt	Risk Management	Faculty, Staff and Students who interact with minors, HR, Office of Diversity, Equity and Inclusion, and Institutional Events	Camps, Academic Programs, Mandatory Reporting, Background Checks, Minors on Campus, Recruiting	California Penal Code



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Records	<i>EVP/Provost/Chief Academic Officer</i> Norma Bouchard <i>EVP/COO</i> Harold Hewitt <i>EVP/Chief Advancement Officer</i> Matt Parlow	Deans, Department Heads, Legal Affairs, IS&T, Institutional Compliance	Registrar, Financial Services, Office of Research, IS&T, University Advancement, Financial Aid, and Departments	Privacy, Record Retention Policy, E-Discovery Requests, Litigation Holds, Requests for Access	FERPA, HIPAA, GLBA, FAR, Litigation Holds
Real Estate/Property Management	<i>EVP/COO</i> Harold Hewitt	Facilities Management	Facilities Management, HR, and Financial Services,	Eviction notices, Income tax, Fair market value (FMV) smoke and CO2 detectors	FMV - IRS
Responsible Conduct Research/Research Misconduct	<i>VP Office of Research</i> Martina Nieswandt	Office of Research Integrity	Principal Investigators (PI), Deans, and Department Chairs or other Faculty and staff conducting research	Faculty appropriate training to students, Improper cost charging, Falsification of data or results, Plagiarism	Public Health Service Regulations, HHS (ORI)/NIH regulations, NSF, NIH



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Research involving Animals	<i>VP Office of Research</i> Martina Nieswandt	Office of Research Integrity	Principal Investigators (PI), Deans, Department Chairs or other Faculty and staff conducting research, IACUC, and EHS	Humane care and treatment of animals	Animal Welfare Act, HHS (OLAW)/NIH regulations
Research involving Humans	<i>VP Office of Research</i> Martina Nieswandt	Office of Research Integrity	Principal Investigators (PI), Deans, Department Chairs or other Faculty and staff conducting research, IRB, and EHS	Conducting tests or surveys using people, Informed Consent	HHS/NIH regulations, HIPAA, Federal Law Assurance
Title IX	<i>CHRO</i> Brenda Rushforth <i>VP for Student Affairs/Dean of Students</i> Jerry Price <i>VP of Diversity, Equity, and Inclusion</i> Reg Stewart	Student Affairs, HR, Office of Diversity, Equity, and Inclusion	Public Safety, HR, Dean of students, and Legal Affairs	Title IX - Sexual Assault Title IX - Reporting Title IX - Sexual Harassment, Diversity, Equity, and Inclusion	Title IX, Violence Against Women Act, Campus Sex Crimes Prevention Act, FERPA, HIPAA

* Approved by the Institutional Compliance Committee 2/17/20, 4/7/20 7/26/21, 10/24/23

Revised 1/8/24