



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>Interim EVP/Provost/Chief Academic Officer Michael Ibba</i>	Office of the Provost	Deans, Department Chairs, Legal Affairs, and Office of Faculty Affairs	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>Interim EVP/Provost/Chief Academic Officer Michael Ibba</i>	Office of Institutional Effectiveness	Deans, Department Chairs, Vice Provosts, and Vice Presidents	University Accreditation and Quality Enhancement Plan	HEOA and Programmatic Accreditation
ADA	<i>Interim COO Brian Thomason Interim EVP/Provost/Chief Academic Officer Michael Ibba VP/CHRO Brenda Rushforth Senior VP for Student Affairs Jerry Price VP Campus Planning and Design Collette Creppell</i>	Campus Planning, Disability Services, Human Resources (HR), Student Affairs	Office of Provost, Property Management, Strategic Marketing (website), and IS&T	Access to buildings, Accommodations in courses and the workplace, and Website Accessibility, Digital Access	Americans with Disability Act (ADA) Section 504 Accommodations, Fair Labor Housing, State laws
Admissions	<i>VP and Dean of Enrollment Mike Pelly</i>	Office of Admissions	Deans, Financial Aid, Registrar	Eligibility for Title IV funds, Diversity, and Non-discrimination	ADA, FERPA, USERRA, Title IV/IX, HEOA, Veterans programs, Program integrity rules on misrepresentation and incentive pay, State laws

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Athletics	<i>EVP/Chief Advancement Officer</i> Matt Parlow	Athletics	Administration, Registrar, Financial Aid, Student Affairs, Risk Management, Grad Education (limited)	Gender equality, Recruiting, Records, Sports Camps, NCAA Compliance, and Protection of minors	Title IX, Equity in Athletics Disclosure Act, FERPA, NCAA compliance, SCIAC rules
Bond Financing	<i>Interim COO</i> Brian Thomason	Financial Services	Campus Planning, Financial Services, Deans, and Legal Affairs	Private space use	IRS Safe Harbor Contract Rules (Rev procedure 97-13 and Revenue Procedure 2007-47)
Bookstore	<i>Interim COO</i> Brian Thomason	Academic Administration, Auxiliary department (Follett) Information Systems & Technology (IS&T)	Bookstore, Deans, Operations Directors, Faculty, Provost Office, and IS&T	Textbook information implementation	HEOA, Textbook
Cadavers	<i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba	Crean College	Deans, Faculty, Environmental Health & Safety (EH&S), and Legal Affairs	Treatment and handling of cadavers	Contractual stipulations, State and Federal laws
Campus Safety	<i>Interim COO</i> Brian Thomason	Public Safety	EH&S, Housing and Dining, Parking, Risk Management, Fire Safety	Policing campus, crime reporting, building security, investigations, Building capacity, and max. occupancy	Clery Act, VAWA, HEOA, Campus Sex Crimes Prevention Act, Title IX, California Corporate Code, Building Code, Fire Code
Conflict of Interest (Board Members and Key Personnel)	<i>Interim COO</i> Brian Thomason	Office of the EVP/COO	Audit committee of the Board of Trustees, Deans and Key personnel, and Institutional Compliance	Gifts, Stocks, Business Ownership, and Family Relations	IRS Regulations for Non-profits, State Law, California Corporate Code, 990 form.
Conflict of Interest and Conflict of Commitment (Faculty and other Employees, including Private Investigators- Office of Research)	<i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba <i>Interim COO</i> Brian Thomason <i>VP - Office of Research</i> Martina Nieswandt	Institutional Compliance Provost Office Office of Research Integrity	Deans, Faculty, Legal Affairs, Financial Services, Human Resources	PI - Financial disclosures, improper influence over research or other decisions for financial, reputational, or personal gain, self-dealing, and nepotism, Conflicts of commitment	IRS regulations for non-profits, university policy, PHS, NSF, HHS regulations other funding sources

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Construction and Campus Planning Contracts	<i>Interim COO Brian Thomason</i> <i>VP Campus Planning and Design Collette Creppell</i>	Campus Planning, Facilities Management	Campus Planning, Facilities Management, Purchasing, Legal Affairs, and Risk Management (insurance)	Competitive bids, Purchase Orders, and Contracts	ADA, Competitive bids, Purchase orders Contract Fair Labor Housing
Donor Gift	<i>Interim COO Brian Thomason</i> <i>EVP/Chief Advancement Officer Matt Parlow</i>	Financial Services, University Advancement	UA, Financial Services, Investments, Legal Affairs, Financial Aid, Strategic Marketing	Explicit donor instructions on how funds can or cannot be spent, IRS regulations on gifts and endowments, state regulations on solicitation, and Art gifts	State registration requirements, UPMIFA, Donor-advised fund (DAF) requirements, Gift Agreement terms, IRS regulations, and CAN-SPAM
Emergency Preparedness	<i>Interim COO Brian Thomason</i>	Public Safety	EH&S, Facilities Management, Risk Management, Sodexo, and Strategic Marketing	Reputational risk, Emergency Operations Plan, Evacuation Drills, Training, Food, and water inventory, and Crisis Communication	Emergency Planning and Community Right Act (EPCRA), Clery Act, HEOA, FERPA, and Contract stipulations
Environmental Health and Safety	<i>Interim COO Brian Thomason</i>	Enterprise Risk and Safety	Office of Research, EH&S, Fire & Safety, Campus Safety, Strategic Marketing (Communications), and Student Health Center	Lab Safety, Use of chemicals, Building and Fire Codes, Workplace Safety, Waste Management, Biosafety, Occupational Health, and Communicable Diseases	OSHA, CERCLA, Toxic Substance Control Act, Clean Air Act, and Clean Water Act
Equity, Diversity and Affirmative Action	<i>Interim COO Brian Thomason</i> <i>VP/CHRO Brenda Rushforth</i> <i>Interim EVP/Provost/Chief Academic Officer Michael Ibba</i>	HR	Deans, Department Chairs, HR, Student Affairs, and Institutional Effectiveness	Discrimination in hiring practices, Sexual Harassment in the workplace, and Cross-Cultural Center	Age Discrimination Act, EO 11246 (AA) Equal Pay Act, Title IV, VII, IX, Fair Housing Act, and Pregnancy Discrimination Act
Export Controls	<i>VP - Office of Research Martina Nieswandt</i>	Office of Research Integrity	All Faculty and Staff with research responsibilities, Global Education, HR, Information Security, and Legal Affairs	Publication restrictions on research, and sending unpublished materials to foreign countries	ITAR, EAR, OFAC

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Extended Education	<i>Interim EVP/Provost/Chief Academic Officer Michael Ibba</i>	Academic Administration	Deans, Financial Aid, Advising, Financial Services, Legal Affairs, and Registrar	Scheduling of classes, payment, and credit hour determinations	State and Federal Laws, HEA
Federal Contract and Grant Management Reporting (Pre/Post Award)	<i>VP - Office of Research Martina Nieswandt</i>	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	Award requirements, Effort reporting, financial reporting, and Allowable expenses	OMB Uniform Guidance, FAR, Government suspension, and debarment listing
Financial Aid	<i>VP and Dean of Enrollment Mike Pelly</i>	Financial Aid	Registrar, Cashier, Admissions, Athletics, Payroll, and Financial Services	Eligibility for financial aid, and required reports to DOE	Title IV, FERPA, HEOA, and State laws
Financial Services (Escheatment)	<i>Interim COO Brian Thomason</i>	Financial Services	Deans, Department Chairs, and Student Affairs	Escheatment	State Laws
Financial Services (Procurement)	<i>Interim COO Brian Thomason</i>	Financial Services (Purchasing)	Deans, Department Chairs, Legal Affairs, Office of Research, and IS&T (Software and Hardware)	Purchasing policy, and allowability of expenses	Procurement Services, Government suspension, and debarment listing
Financial Services (Student Business Office)	<i>Interim COO Brian Thomason</i>	Financial Services (Student Business Office)	Athletics, Registrar, Financial Aid, Admissions, and Residence Housing (students)	Refunds of Federal funds, and tax documents	Title IV
Graduate Programs	<i>VP - Office of Research and Graduate Education Martina Nieswandt</i>	Office of Research and Graduate Education	Financial Aid, Registrar, Legal Affairs	Privacy, Diversity, non-discrimination, and out of state activity	ADA, FERPA, USERRA, Title IV/IX, HEOA, Veterans programs, Program integrity rules on misrepresentation and incentive pay, and State laws

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Human Resources	<p><i>Interim COO</i> Brian Thomason</p> <p><i>VP/CHRO</i> Brenda Rushforth</p>	HR	Financial Services, Legal Affairs, Financial Aid	Employment benefits, leave, personnel policies, recruiting, termination, training, Federal work-study, independent contractor	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, Workman's compensation, FMLA, Executive Order 11246, E-Verify, Affordable Care Act, FAR, and JOLTS
IS&T	<p><i>VP/CIO</i> Helen Norris</p>	Information Systems & Technology	Information Security, Office of Research, Legal Affairs, Financial Services, HR	Privacy, Access controls for systems with students and employee data, Virus/hacking prevention, Data handling, and 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	<p><i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba</p> <p><i>Interim COO</i> Brian Thomason</p>	Admissions, Faculty Affairs, HR, Financial Services	Admissions, Financial Services, HR, Student Affairs, Office of Disability Services, and Legal Affairs	Foreign scholars and students, Visiting artists and lecturers, Employment visas, and Application of tax treaties to the individuals	Immigration and Nationality Act, Mutual Education and Cultural Exchange Act, SEVIS regulations, I-9 instructions and regulations, Export Controls, ITAR, EAR, and OFAC
IPEDS and External Reporting	<p><i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba</p>	Institutional Research & Decision Support (IRAD)	Registrar, Financial Aid, Student Affairs, Graduate Studies, 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

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Media Rights	<i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba	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, and Script and Digital Rights	Copyright (Music and Film), Federal and State Laws, and Private contracts
Minors on Campus	<i>Interim COO</i> Brian Thomason	Risk Management	Faculty, Staff and Students who interact with minors, HR, Institutional Events	Camps, Academic Programs, Mandatory Reporting, Background Checks, Minors on Campus, and Recruiting	California Penal Code
Records	<i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba <i>Interim COO</i> Brian Thomason <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, and Financial Aid Departments	Privacy, Record Retention Policy, E-Discovery Requests, Litigation Holds, and Requests for Access	FERPA, HIPAA, GLBA, FAR, and Litigation Holds
Real Estate/Property Management	<i>Interim COO</i> Brian Thomason	Facilities Management	Facilities Management, HR, and Financial Services	Eviction notices, Income tax, and Fair market value (FMV) smoke and CO2 detectors	FMV - IRS
Responsible Conduct Research/Research Misconduct	<i>VP - Office of Research</i> Martina Nieswandt	Department 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, and Plagiarism	Public Health Service Regulations, HHS (ORI)/NIH regulations, NSF, and NIH
Research Involving Animals	<i>VP - Office of Research</i> Martina Nieswandt	Department of Research Integrity	Principal Investigators (PI), Deans and Department Chairs, or other Faculty and staff conducting research (i.e., IACUC, EH&S)	Humane care and treatment of animals	Animal Welfare Act, and HHS (OLAW)/NIH regulations

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Research involving Humans	<i>VP - Office of Research</i> Martina Nieswandt	Department of Research Integrity	Principal Investigators (PI), Deans and Department Chairs, or other Faculty and Staff conducting Research IRB, and EH&S	Conducting tests or surveys using people and Informed Consent	HHS/NIH regulations, HIPAA, and Federal Law Assurance
Title IX	<i>Interim COO</i> Brian Thomason <i>VP/CHRO</i> Brenda Rushforth <i>Interim EVP/Provost/Chief Academic Officer</i> Michael Ibba <i>Senior VP for Student Affairs/Dean of Students</i> Jerry Price	Academic Units, Student Affairs, HR	Public Safety, HR, Dean of Students, and Legal Affairs	Title IX: Sexual Assault, Title IX: Reporting, Title IX: Sexual Harassment	Title IX, Violence Against Women Act, Campus Sex Crimes Prevention Act, FERPA, and HIPAA
<p><i>* Updated/Approved by the Institutional Compliance Committee: 10/24/23</i> <i>Revised 1/8/24, 4/11/24, 4/10/25, 5/1/25, 6/12/25</i></p>					