

Compliance Team
February 25, 2014

Present: Kathy Keating, Sara Dorer, Todd Hurley, and Mike Ahrendt, Diane Patrick, Paul Doane, Jim Petersen, Faye Davis, Marybeth Beighly, Langston Gant, Victoria Janowiak, and Rebecca Whitman

Guests: Kathy Mullins & Jennifer Kelly

Absent: Danielle Dawson, Patti Trepkowski, & Donna Kragt, Eric Williams, Judith Larsen, Donelle Sedore, Deborah Sanders, Dominic Dorsey

Meeting Overview:

Kathy Keating explained to the group the purpose of the team for the new members, which is to identify the people/areas that are ultimately responsible to make sure the institution is in compliance with relevant laws and regulations.

Updates:

General Counsel - Kathy K.

- Working on OCR obligations in Resolution Agreement regarding ADA compliance and accessibility issues.
- Drug and Alcohol policy has been updated and will be shared with all employees soon.

Staff Development - MaryBeth Beighley

- New Learning Management System: If you would like to take a look, you can login at <https://grcc.skillport.com>
Username is your Wnumber
Password is your legal first name and the last 4 digits of your W number
- Known Issues: End users may need to request via the IT HelpDesk for a java upgrade to version 45 or 51.
- Currently working with IT to discuss how to globally approach this matter proactively.
- MaryBeth B. would like a subteam create to determine:
 - NEO – required training for all new employees
 - Category A – need to update policy for blood borne pathogens and required annual training cycle
 - AllStaff – annual training requirements?
- MaryBeth B. asked that all members send her suggestions recommending mandatory training and an annual schedule. MB will then put a recommendation together for Kathy K. so that she can present to cabinet in either April or May.

Student Affairs - Sara Dorer

- Title IV program review final determination received

- By March 1, submitting new DAAPP (and notifying all students/employees this week)
- In response to a report released in January 2014 compiled by the White House titled “Rape and Sexual Assault: A Renewed Call to Action”, President Obama has developed a task force to develop initiatives intended to combat the issue of sexual assault, with a particular focus on college campuses.
- Student training modules – options going to cabinet

Title IX - Sara Dorer reported out in Deb Sanders absence

Sexual Assault Prevention/Awareness

- Still working on improving this area
- What is our official policy on pregnant or parenting and Title IX?
- Are reasonable adjustments like the request for larger desks, elevator access and to allow frequent bathroom trips necessary due to pregnancy significant to keep those requests housed within DSS? (These are legitimate accommodation concerns but since they are temporary and not long term significant life activity impediments they would not be covered under the ADA)
 - o According to the OCR these students should be treated the same as any other student with a temporary medical condition, in which case those students would not be referred to DSS.
- How is DSS equipped to adequately deal with fathers whom are parenting or needed during the pregnancy process?
- How to improve advertising rights regarding Excused Absences and Medical Leave
 - Transgender issues especially involving facilities and PeopleSoft name changes. Eric Williams focusing on these efforts.
- Looking at updating the EEOC statement.

Human Resource - Faye Davis

- A FMLA bill that would change current language to cover partners is currently being watched closely by HR.
- Job descriptions now include physical requirements along with essential and non-essential requirements.
- Affordable Care Act – Kathy K. shared with the group new federal guidelines on counting adjunct hours for purposes of the ACA and how GRCC has created a new

category of M&C employees called limited benefit contingency. Work study students are not covered under this act.

Risk Management - Jim Petersen

- Bloodborne Pathogens and Chemical Hygiene Plans will be reviewed this year so they are both in compliance.

Financial Aid - Paul Doan

- Default draft rate for 2011 came in at 26.4 – the institution is trying to stay under the 30%.
- Title IV audit findings have been received with two issues identified: The first was the lack of programs within the Drug and Alcohol policy, which has been updated. The other issue was a student that hadn't received their graduation certificate and was therefore ineligible to receive financial aid. GRCC was required to repay the amount granted to the student.
- The federal subsidized loan has new limitations. This will especially affect students coming from a university to a community college. Students need to be educated about this limitation to make informed borrowing decisions.
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Enrollment Office - Diane Patrick

- FERPA has been included with MyDegreePath and the institutions new data warehouse.

Campus Police - Becky Whitman

- Campus Security Authority letters will go out within the next couple of weeks.
- Sexual Assault Prevention/Awareness will be added to the Cleary Report.

Renovation - Vicky Janowiak

- Compliance codes require ADA changes to facilities renovations are being completed within each building.
- Suggested that team members perform a comprehensive review of each area of the College to ensure that we have identified compliance responsibilities and that they are imbedded in position descriptions so that we do not have any 'gaps'.

IRP - Kathy Mullins (representing Donna Kragt)

- GRCC will host the AQIP Quality Checkup – Baldrige Option- on April 2-4, 2014. The Quality Checkup will involve two reviewers (Dr. Craig Mosher, Dr. Christine Manion) visiting the campus over a three day period. The Higher Learning Commission scheduled the Quality Checkup to affirm the accuracy of the GRCC Baldrige Option Summary
- Accreditation Criteria report (November, 2013), review AQIP Action Projects and strategies identified to capitalize on GRCC's strengths and opportunities for improvement, affirm GRCC's commitment to continuing quality improvement, and confirm GRCC's compliance with accreditation expectations. Documents prepared for the Quality Checkup included the Federal Compliance Filing Report, the Quality Program Summary, and the Obligations of Affiliation report.

IT - Mike Ahrendt

- Currently the institution is in compliance with credit card processing procedures (PCI) – IT is currently working to make changes that are necessary to stay in compliance.

Finance - Todd Hurley

- The IRS audit resulted in a fine of \$100,000 – because of this, processes were reviewed and changed.

Next Steps

- The group believes a Compliance Officer position is needed to identify gaps, track issues, coordinate training, respond to compliance concerns and manage a matrix. Currently, in the absence of this position and a more formal compliance program, the compliance team meetings are a good faith effort to meet institutional obligations.
- Kathy K. will send out information about compliance matrixes in other colleges for us to consider using at GRCC.
- Team members have agreed to audit their respective area compliance responsibilities and bring a table of responsibilities and accountable positions to the August meeting. This table will show major compliance functions in each area and the person (position) that is ultimately accountable for achieving compliance.
- Kathy K. will send the group job descriptions of compliance officers for the group to review if the team wishes to advocate for a new position to present to cabinet, for the 2015-16 budget year.

Next Meeting is in August.

Adjourn – 12:09 PM