

August 29, 2013: Compliance Meeting Minutes

Present: Danielle Dawson, Kathy Keating (lead), Donna Kragt, Sara Dorer, Todd Hurley, Patti Trepkowski, and Eric Williams, Mike Ahrendt, Paul Doane, Faye Davis, Judith Larsen, Brian Vliem, Dominic Dorsey

Guests: Ric Underhile, Marybeth Beighly (new member)

Absent: Victoria Janowiak, Rebecca Whitman, Danelle Sadore

Meeting began at 10:00 AM

Overview of Current Compliance concerns reported from departmental representatives:

General Counsel (Kathy Keating):

1. Records retention schedule update: Retention schedule submitted to the State was returned for revisions.
 - Provide a narrative to describe each of the documents rather than just a title.
 - Provide legal citations for mandated retention periods where applicable.
 - Refer to General Schedules for specific departments if applicable.
 - Refine the use of "permanent" submitted by departments
2. Discussion focused on the increasing compliance concerns in higher education.
 - Compliance Team decided to meet 6 times per year (every other month)
 - Team requested research on the duties of college and university compliance officer positions.
 - Team approved an off cycle budget request for dollars to fund a Learning Management System to deliver mandated training to employees.

Finance (Todd Hurley):

1. In order to remain compliant with Federal regulations and the Office of Retirement Services (ORS), effective Fall 2013 there will be changes to FICA/retirement deductions from student employees.
2. FALL/WINTER SEMESTERS:
ALL student employees must continue to be enrolled for a minimum of 6 credit hours to be employed on campus. Student Employment Services will continue to monitor this and will notify supervisors if their student employee falls below the minimum credit hour requirement.
 - Based on this requirement all students will be exempt from paying FICA taxes
 - Students enrolled full time (12 or more credits) will also be exempt from mandatory retirement contributions to the Office of Retirement Services (ORS).
 - Students enrolled less than full time (6-11 credit hours) will be required to make mandatory retirement contributions to the Office of Retirement Services. Contribution percentages may vary by student employee, with a maximum percentage of 7.6% of their gross earnings.
3. SUMMER SEMESTER:
ALL student employees must be enrolled for a minimum of 3 credit hours to be employed on campus. Eligibility to work in the summer will no longer be contingent on the upcoming fall semester enrollment.
 - Based on this requirement, all students will be exempt from paying FICA taxes.
 - Students enrolled full time (6 or more credits) will also be exempt from mandatory retirement contributions to the Office of Retirement Services (ORS).
4. Students enrolled less than full time (3-5 credit hours) will be required to make mandatory retirement contributions to the Office of Retirement Services. Contribution percentages may vary by student employee, with a maximum percentage of 7.6% of their gross earnings.
5. WHAT THIS MEANS FOR SUPERVISORS:
 - We encourage you to hire student employees enrolled for 12 or more credits whenever possible, but ask that you please do not reduce student work hours as a result of this additional cost.
 - When employing Work Study students, there will be no impact on your department's budget, as all Work Study wages are charged to a restricted grant account. For Student Assistants, who are enrolled for less than 12 credit hours, the additional cost will be charged to your departmental budget (account 2149). For those students, the cost will be an additional \$2.04 per hour.
 - For many departments, any additional cost will be minimal and will be able to be accommodated within existing Student Assistant budget allocations. Others may be able to offset any shortfall with under-spending

in other “controllable” budget line items (remember, Student Assistants, unlike other salary budgets, is considered a controllable line item).

- However, we realize that for some departments, this may cause a budget shortfall. We understand that this change has come up very quickly and you did not have this information when going through the budget planning process. Therefore we’ll work with you on your budget issues as we go through this transitional year. You may wish to consider your Student Assistant budget allocation as we approach the 2013-14 mid-year budget cycle. Other options are available. If you have any questions or need help with your budget, please contact Jim Peterson in Financial Services at 234-4017.

6. WHAT THIS MEANS FOR STUDENT EMPLOYEES:

- Student employees enrolled for less than full time will now have retirement plan contributions deducted from their paychecks.
- However, student employees who are newly hired as of July 1, 2013 MAY be able to opt out of the employee contributions. To obtain more information and to fill out the necessary paperwork to opt out of this payroll deduction, please contact Becky Bailey, Director of Payroll, at 234-4038.
- Becky will be holding informational sessions for student employees to learn more about these deductions.

Academics (Patti Trepkowski):

1. Changes in curriculum guides for programs
2. Mandatory curriculum policy approved by AGC
3. Still concerns surrounding ability to meet expectations regarding student learning outcome assessments

Legislative/Community Affairs (Eric Williams):

1. Goal is to partner with an outside agency to host the Alpha Beta Omega Program to avoid compliance issues with Prop 2.

Title IX (Deb Sanders):

1. Under VAWA, effective March 7, 2014, colleges and universities are required to:
Report domestic violence, dating violence, and stalking, beyond crime categories the Clery Act already mandates; Adopt certain student discipline procedures, such as for notifying purported victims of their rights; and adopt certain institutional policies to address and prevent campus sexual violence, such as to train in particular respects pertinent institutional personnel.
2. Training at a regular initial meeting before the new academic year.
3. Web-based training similar to that for new hires, but intended to provide reminders and updates for existing campus community members.
4. An in-person annual sexual harassment training open to all faculty and staff to share the definitions that the institution uses in its code of conduct and employee handbook for sexual harassment, sexual violence, including sexual assault and rape, consent, and retaliation. Provide examples or short case studies that will give context to these definitions.
5. Sexual Violence: Create specific sexual violence materials as a resource to the campus community. Include sexual misconduct policies, the grievance procedures, and contact information for the Title IX Coordinator, police, counseling center, and the local rape crisis center. Work with IT to ensure that keyword searches from the college web site for terms like “sexual harassment,” “sexual assault,” and “Title IX” lead to your Title IX page as the first result.
6. Pregnant and Parenting Students: School must excuse a student’s absences because of pregnancy or childbirth for as long as the student’s doctor deems the absences medically necessary. When student returns they must be allowed to return to same status as before leave began. Treat same way as similarly situated students needing temporary medical accommodations.
- 7.

Student Affairs (Sara Dorer):

1. Title IV: GRCC is not compliant because information is only provided to students and there is not a mandatory system tracking whether they received the information.

Staff Development (Marybeth Beighley):

1. RFP for a Compliance Learning Management System to address:

- Americans with Disabilities Act
- Bloodborne Pathogens
- Drug and Alcohol Prevention and Awareness (Title IV)
- Ethics
- FERPA (Family Educational Rights and Privacy Act)
- Grand Rapids Community College AUA (Acceptable Use Agreement)
- HIPAA (Health Insurance Portability and Accountability Act)
- Michigan Right to Know Hazard Communication
- Section 504 of the Rehabilitation Act of 1973
- Sexual Harassment
- Title IX
- Clery Act
- Copyright

2. Preferences:

A full training library with modules that covers Facilities and Physical Plant employee needs as well as online staff development topics. Such as:

- Back Injury and Lifting
- Heat Illness Prevention
- Electrical Safety
- Ladder Safety
- Lockout/Tagout: Energy Release
- Slips, Trips, & Falls
- Personal Protective Equipment (PPE)
- Hearing Loss Prevention
- Fire Extinguisher Safety
- Material Safety Data Sheets (MSDS)
- Cardiopulmonary Resuscitation (CPR)
- First Aid
- AED (Automated External Defibrillators)

3. Need to add language regarding student compliance training/requirements

4. Funding: Mid-year budget request. Discussion considered unspent departmental monies. Some will be available from Staff Development budget (\$9,000)

5. Accountable: Staff Development will be responsible for the coordination of efforts. It is unclear where the ultimate accountability resides.

IRP (Donna Kragt):

1. Preparation of the Federal Compliance packet for the HLC Check up Team. This packet needs to be sent to the team members by February 1. An update was provided to Dean's Council on August 8 and will be discussed again on Sept 12.

IT (Mike Ahrendt) :

1. PCI compliance: We are upgrading from eCard to eAccounts. Their road map for future upgrades will reduce our requirements to meet PCI compliance, if implemented.

2. HIPAA: IT will be doing training regarding HIPAA. I have also been tasked with meeting the technical aspects of HIPAA

3. ADA: We have the server for Compliance Sheriff. The install of the software is scheduled. Once Patrick is trained we will begin scanning BlackBoard, PeopleSoft, and the website for any necessary corrections to meet ADA compliance.

Financial Aid (Paul Doane):

2. Default management team is in place and beginning to work on lowering default rates
3. Loan interest rates will now be fixed variable and tied to the 10 year treasury bill
4. Unusual enrollment history – students that collected loans at multiple schools
 - Financial Aid needs a transcript (accepting unofficial)
 - Students must complete a form in person at the Financial Aid office
 - Students also need to submit proof of high school diploma or GED

Grants (Judith Larsen):

1. U.S. Education Department General Administrative Regulations (EDGAR) have undergone revisions to: improve the Department's ability to evaluate the performance of discretionary grant programs; support, where appropriate, projects supported by evidence of effectiveness; review grant applications using selection factors that promote the Secretary's policy
2. Objectives related to project evaluation, sustainability, productivity, and strategy to scale; and reduce burden on grantees in selecting implementation sites, implementation partners, or evaluation
3. Service providers for their proposed projects. These revisions are effective on September 12, 2013. Judith will inform staff on the changes.
4. U.S. Office of Management and Budget OMB Circulars A 110, A 122 and A 133 will be consolidated into Title 2 of the Code of Federal Regulations (CFR). This may affect financial management of grants.

Next meetings: November 2013 and February 2014

1. **Everyone should be able to identify and discuss the compliance concerns in their area and the person responsible for addressing those concerns.**