

Compliance Training Rotation Plan

General Compliance Training Modules

Module Name	Why?	Frequency	2009	2010	2011	2012	2013	2014
Computer Security and Use	Information security is the number one risk area for universities today. Texas Administrative Code §202.77 requires that all institutions of higher education in Texas provide on-going security training for all users. As part of that on-going training, President Daniel and the Executive Compliance Committee require this training to be completed once a year.	Annual	x	x	x	x	x	x
Contacts with the Media, Government, and Outside Investigators	UT System Administration Policy Library -- Policy UTS139; Texas Public Information Act; Texas Government Code § 552	Periodic refresher every 5 years					x	
Contracts and Agreements, and Purchasing	UTD Administrative Policies and Procedures Manual, Sec. E2-440.0-500.0; U.T. System Board of Regents' Rules and Regulations Series 10501 – Delegation to Act on Behalf of the Board; U.T. Board of Regents' Rules & Regulations Series 20901 – Procurement of Certain Goods and Services	Periodic refresher every 4 years				x		
Copyright and Intellectual Property	U.T. Board of Regents' Rules & Regulations Series 9000 – Intellectual Property	Periodic refresher every 4 years		x				
Drug Free Workplace	US Department of Labor - Drug Free Workplace Act; UTD Administrative Policies and Procedures for Drug-Free Community and Schools Policy - D11.175.0	Periodic refresher every 5 years		x				
Effectively Controlling Risk	UT System Action Plan to Enhance Internal Controls; UTS118 - Statement of Operating Policy Pertaining to Dishonest or Fraudulent Activities; Governor's Executive Order RP36 - Relating to preventing, detecting, and eliminating fraud, waste and abuse.	Periodic refresher every 4 years				x		

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FERPA Training	Family Education Rights and Privacy Act (FERPA) - 20 U.S.C. § 1232g; 34 CFR Part 99. Disclosure of private FERPA information is a high risk to students and to the University. FERPA regulations require annual notification to students of their rights under FERPA. Due to continuing reports of FERPA violations by both faculty and staff, this training is required annually by Dr. Daniel and the Executive Compliance Committee.	Annual	x	x	x	x	x	x
Introduction to UTD Institutional Compliance Program / Compliance Review	UT System Action Plan to Ensure Institutional Compliance, UT System Action Plan to Enhance Institutional Compliance, UT System Administration Policy 119 - Institutional Compliance Program, 2007 Federal Sentencing Guidelines	Periodic refresher every 5 years						x
Retention and Disposal of Records	Texas Government Code §441.180(11); UTD Records Retention Schedule; Texas State Records Retention Schedule	Periodic refresher every 5 years			x			
Sexual Harassment and EEO Compliance	UTD Administrative Policies and Procedures Manual, Sec. D11.195.0, Non-Discrimination Policy and UTD Administrative Policies and Procedures Manual, Sec. D11-115.0, Sexual Harassment Policy and Procedure, specifically address sexual harassment and Equal Employment Opportunity policies at UTD. Training in this area is required every two years according to Texas Labor Code Section 21.010.	Periodic refresher every 2 years	x		x		x	
Standards of Conduct	Texas Ethics Commission; U.T. Board of Regents' Rules & Regulations Series 30103 – Standards of Conduct; U.T. Board of Regents' Rules & Regulations Series 30104 – Conflicts of Interest, Texas Government Code § 572.051; UTS135 -- Code of Ethics for Financial Officers and Employees The Texas Government Code required distribution of Standards of Conduct to all employees by January 1, 2008 and then all new employees/officers within 3 days of hire.	Periodic refresher every 2 years		x		x		x

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Financial Oversight of Sponsored Projects	The management of sponsored research is the responsibility of the Principal Investigator (PI). Other administrative and academic employees at UTD also assist in the oversight of the activities and resources. This module provides an overview of the many requirements found in various Office of Management and Budget (OMB) Circulars, such as A-21 and A-110. President Daniel and the Executive Compliance Committee require all PIs and associated staff with one or more active sponsored awards to complete this compliance module annually.	Annual	x	x	x	x	x	x
HIPAA- Compliance Privacy	The Health Insurance Portability and Accountability Act of 1996) Privacy Rules 45 C.F.R. Parts 160 and 164 (HIPAA) outlines the requirements for the privacy and security of medical information. Every UTD employee that works with this information is responsible for knowing and following the rules about privacy and information security. Because of the sensitive nature of this information, President Daniel and the Executive Compliance Committee require employees handling medical information at the Callier Center, the Center for Brain Health, and Information Security to take refresher training every year.	Annual	x	x	x	x	x	x
Human Subjects in Research	Institutional Review Boards (Federal Policy for the Protection of Human Subjects) 42 U.S.C. § 289; 45 CFR § 46.101 et seq. (Health and Human Services) 21 CFR 50; 21 CFR 56 (FDA);	Periodic refresher every 2 years		x		x		x
Petty Cash Funds	Business Procedure Memorandum No. 27, Departmental Petty Cash Fund Handling Procedures, establishes UTD petty cash procedures. Due to the potential risk of fraud or financial mismanagement, President Daniel and the Executive Compliance Committee require annual training for all petty cash custodians.	Annual	x	x	x	x	x	x

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Property Inventory * Normally a job-specific module, but included for all employees in FY08 General Compliance Training	The rules governing property management and inventory procedures are included in both UTD Administrative Policies and Procedures Manual, Sec. F15-100.0 and Texas Government Code, Chapter 403, Subchapter L. Due to the high financial and high profile nature of violations, President Daniel and the Executive Compliance Committee require that all department heads and those employees designated to inventory and account for property take this training on an annual basis.	Annual	x	x	x	x	x	x
Purchasing Cardholder Training	UTD Purchasing Card Guidelines establish University rules for purchasing cardholders. Because of the exceptionally high risk associated with purchasing cards, President Daniel and the Executive Compliance Committee require annual training for all cardholders and their supervisors.	Annual	x	x	x	x	x	x
Account Reviewer/Supervisor – P Cards	UTD Purchasing Card Guidelines establish University rules for purchasing cardholders. Because of the exceptionally high risk associated with purchasing cards, President Daniel and the Executive Compliance Committee require annual training for all cardholders and their supervisors.	Annual	x	x	x	x	x	x
Scholastic Dishonesty	The Handbook of Operating Procedures, Title 5, Chapter 49, section 49.36 and the UT System Board of Regents' Rules & Regulations Series 50101 -- Student Conduct and Discipline set forth the rules regarding scholastic dishonesty at the University. Because scholastic dishonesty puts UTD at risk of serious reputational harm, and because of the ongoing nature of the concern, President Daniel and the Executive Compliance Committee have required this training module of all faculty annually.	Annual	Faculty	Faculty	Faculty	Faculty	Faculty	Faculty
Time and Effort	Office of Management and Budget's (OMB) Circular A-21 "Cost Principles for Educational Institutions"	Periodic refresher every 2 years		x		x		x