



# AMERICAN UNIVERSITY

WASHINGTON, D.C.

SCOTT A. BASS  
PROVOST

August 17, 2009

TO: Deans, Directors and Department Heads

FROM: Scott A. Bass, Provost  
Donald L. Myers, Vice President of Finance and Treasurer

SUBJECT: Compliance

As an institution of higher education, American University is required to comply with a complex variety of federal, state and local laws, regulations and university policies. Some of these impose significant requirements ranging from reporting and disclosure obligations, to limitations on how the university conducts business. The consequences of being noncompliant can be serious, and include large fines, criminal penalties, and other severe repercussions.

Compliance is an enterprise-wide responsibility. Our goal is to assist and facilitate fulfilling compliance responsibilities by creating a process to consolidate and monitor the University's existing decentralized compliance efforts. To that end, a *Compliance Database* was developed to provide an automated management tracking tool and a central repository for information related to the University's compliance obligations.

This system was designed to work in conjunction with university offices that administer compliance activities and to complement, not replace or supersede other efforts. The database was developed to make it relatively easy to track compliance obligations and mitigate the risk of missing a due date for an important submission. Here are just a few examples of compliance obligations that are ideal candidates for inclusion in the *Compliance Database*.

- Higher Education Opportunity Act of 2008
- OSHA reporting
- License renewals
- Formal reporting deadlines (e.g., IPEDS, FISAP)
- Grant reports
- SOX updates

In addition to the examples listed above, several policies were recently adopted to comply with new regulations or legislation. These policies can be accessed through the university's policy web page <http://www.american.edu/policies/Index.cfm>. We are also asking each of you to take stock of those activities within your departments and offices that would benefit from being included in this process.

In order to more fully communicate the features and benefits of this database, appropriate staff from all units across campus will be invited to a meeting during the next few weeks. A demonstration of actual database use and content will be provided at this meeting, and current users will be present to answer any questions about this important tool. Attendees will be able to sign up for training at this meeting. Should you have questions prior to the meeting, please contact Pat Kelshian at x3284 or by email [pat@american.edu](mailto:pat@american.edu) for more information.