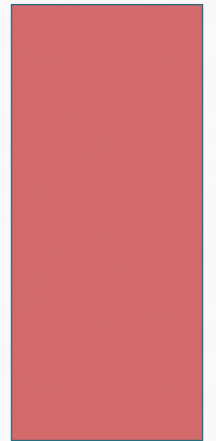


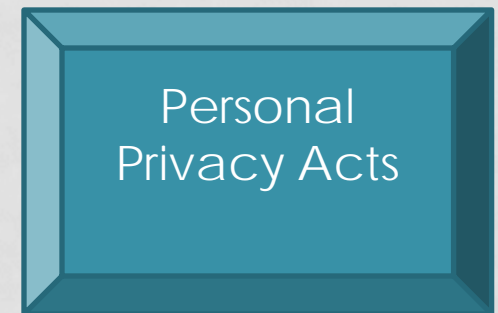
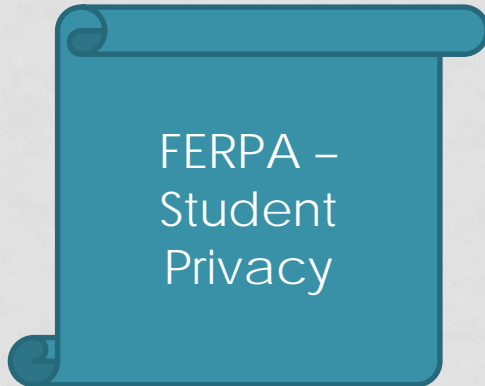
COMPLIANCE 101 – ACRONYM SOUP!!!

PRESENTED BY: MARSHA LOVELL, UCLA
DIRECTOR, BUSINESS AND FINANCE SERVICES



THE AGENDA

- Compliance is a house of cards!
- Choose regulations with most impact to the audience.
- High level overview of regulations and requirements for Student Financial Service areas.
- Discuss pain points and how addressed on each campus.
- Who wins the compliance game!!



PAYMENT CARD INDUSTRY DATA SECURITY STANDARD (PCI)

- MAIN FOCUS – Prevent cardholder data loss or compromise.
- REQUIREMENTS –
 - Anyone processing credit cards must certify compliance with bank annually based on volume of transactions.
 - Protect transmission, processing, and storage of card data.
 - Annual training and documentation requirements.
 - May require external QSA depending on volume.
 - Access to cardholder data severely restricted.

IMPACT –

- Payment and refund processes changed.
 - Training, policies, risk assessment.
- VISA acceptance and convenience fee options effective 2013!



FEDERAL EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

- MAIN FOCUS – Protect non-directory information of students at the University.
- REQUIREMENTS –
 - Written policies/procedures, annual training.
 - Must disclose rights to students annually, maintain non-disclosure notification.
 - May disclose directory information (name, address, phone, date/place of birth, honors/awards, dates of attendance) unless student requests otherwise.
- IMPACT –
 - Training for all student (18+) related personnel.
 - Collections and providing services can be challenging.

FEDERAL TRADE COMMISSION RED FLAG RULES

- MAIN FOCUS – Prevent identity theft promulgated through credit accounts.
- REQUIREMENTS –
 - Any creditor with a covered account, i.e. deferred payment plan, loans, use credit reports.
 - Develop, implement, and administer an identity theft prevention program.
 - Written policies/procedures and actions, annual training.
 - No reporting requirements or penalties.
- IMPACT –
 - Training, policies, risk assessment.
 - Identify red flags and appropriate responses.
 - FTC has no enforcement mechanism and regulates publicly traded companies, not higher education.



FINANCIAL SERVICES MODERNIZATION ACT OF 1999 (GRAMM-LEACH-BLILEY ACT, OR GLB)

- MAIN FOCUS - Prevent theft of personally identifiable financial information related to loan documents.
- REQUIREMENTS –
 - Governs any activity that banks by regulation are authorized to engage in, i.e. loans.
 - Requires periodic risk assessment to protect paper and electronic customer personal information related to loans.
 - Written policies and procedures.
 - Managers responsible to ensure staff are aware and understand security program.
- IMPACT -
 - Security in document handling and storage.
 - Limited access to documentation.
 - Training, policies, risk assessment.

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

- MAIN FOCUS – Implement procedures to protect individual health care information.
- REQUIREMENTS –
 - Control access to personal information.
 - Annual, very intensive training.
 - Annual audit
- IMPACT –
 - Analyze student health information in student bills and Ledger to ensure compliance.
 - Only Health Center should have answers to detailed questions.

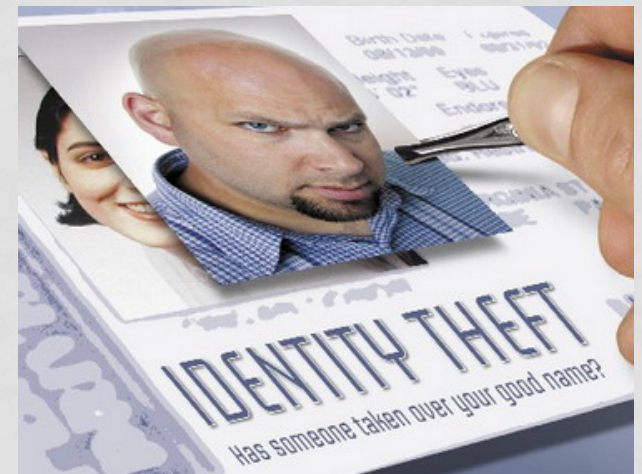


IRS FORM 8300

- MAIN FOCUS – Identify potential money laundering through University payments over \$10k in cash.
- REQUIREMENTS –
 - Rolling year process.
 - Track cash (cash equivalents) receipt on campus and report on IRS Form 8300 within days when \$10k is received.
 - Mandates tracking of cash receipts and a long tax form completion and filed.
- IMPACT –
 - Tracking mechanism in cashier system, student system, etc.
 - Knowledge of tax requirements, ability to track annual cash intake, collection of data

VARIOUS PERSONAL PRIVACY LAWS (CA SB 1386)

- MAIN FOCUS – Prevent identity theft of personally identifiable information, may be financial, SSN, etc.
- REQUIREMENTS –
 - All electronic, possibly hard copy, personally identifiable information – account numbers or SSN in combination with name, address, etc.
 - Written policies/procedures and actions, annual training.
- IMPACT –
 - Notification requirement - \$\$\$
 - Potential credit reporting watch - \$\$\$
 - Loss of trust, public relations



TRUTH IN LENDING ACT (TILA)

- MAIN FOCUS – Compliance with disclosure requirements for loans.
- REQUIREMENTS –
 - Provide self-certification form to borrower upon request.
 - Collect signed self-certification form.
 - Disclosure forms required:
 - Application or solicitation disclosure
 - Approval disclosure
 - Final disclosure
- IMPACT –
 - Lots of paperwork
 - eSignature approved

QUESTIONS? COMMENTS!



Marsha Lovell, UCLA
Director, Business and Finance Services
310-206-6034
mlovell@finance.ucla.edu