Tufts University  
Statement Concerning Regulatory Compliance Obligations

Due to the diverse nature of our academic, research and business activities, Tufts University is subject to a significant number of federal, state and local regulations. The university takes these obligations seriously and is committed to establishing policies, procedures and training to help faculty and staff maintain appropriate regulatory compliance throughout the institution. Certain instances of non-compliance, which on first appearance may be viewed as immaterial or limited to a particular school or division, can potentially trigger investigations by state and federal auditors who often extrapolate their findings across the entire institution, resulting in damage to reputation, significant financial penalties and/or onerous corrective action plans.

The Tufts University Risk Register identifies “regulatory compliance” as a significant area that must be effectively managed. The University Risk and Compliance Committee, chaired by the Executive Vice President, provides senior level guidance on various matters of regulatory compliance. The Office of University Counsel provides legal advice in particular cases. However, regulatory compliance cannot be achieved unless managers who are responsible for monitoring and enforcing compliance with regulations are fulfilling their obligations. Ultimately, regulatory compliance efforts in a large and complex organization such as Tufts require diligent attention and efforts by all employees.

To assist with ongoing and effective oversight of certain major categories of regulatory compliance, the university has delegated primary responsibility to the following officers and senior administrators for the identified areas:

- **Vice President for Human Resources**  
  Employment and Compensation  
  Employee Benefits and Retirement Plans  
  OEO and ADA

- **Vice President for Finance and Treasurer**  
  Debt Compliance  
  Taxes and Treasury  
  Payment Card Industry Data Privacy  
  Post Award Research Administration

- **Vice President for Operations**  
  Environmental Health and Safety  
  Public Safety  
  Facilities

- **Vice Provost**  
  Pre Award Research Administration  
  Animal and Human Subjects  
  Research Integrity and Conflict of Interest
School Deans (where applicable)
  Higher Education Act
  Student Financial Aid
  FERPA (Family Educational and Privacy Act)

Oversight of other more specific areas of regulatory compliance (e.g. Medicare/Medicaid billing, HIPAA, Information Privacy) is the responsibility of senior administrators within each affected School or Division.

Tufts University
University Risk and Compliance Committee
October 2012

Patricia Campbell (Chair) Executive Vice President
Kathe Cronin, Vice President, Human Resources
David Harris, Provost and Senior Vice President
Mary Jeka, Senior Vice President, University Relations
Eric Johnson, Vice President, University Advancement
David Kahle, Vice President and Chief Information Officer
Seth Kornetsky, Director, Audit and Management Advisory Services
Dickens Mathieu, Senior Legal Counsel
Thomas McGurty, Vice President for Finance and Treasurer
Martin Oppenheimer, Senior Legal Counsel
Martha Pokras, Executive Director, Planning and Administration
Linda Snyder, Vice President, Operations
Diane Souvaine, Vice Provost for Research
Dawn Terkla, Associate Provost, Institutional Research and Evaluation