

## NYU Policy Website Eases Path to University Policies and Guidelines

by Rebecca Holland



In 2010, NYU's University Compliance Steering Committee directed the Office of Compliance and Risk Management ("OCRM") to lead an initiative to collect and catalogue all University policies and create a Policies and Guidelines database to allow the NYU community easy access to this important information. The timing was right, following the launch of the newly redesigned nyu.edu, which offered a new Content Management System ("CMS") with the technical sophistication that made that it possible to develop the Policy Website, located at [nyu.edu/policies](http://nyu.edu/policies).

OCRM worked for more than a year with key administrators representing all sectors of the University's business operations to identify and gather policies, and is close to completing the process of bringing all University policies together in a central repository. The [Policy Website](#) provides user-friendly access to University policies, as well as manuals containing key procedures and guidelines.

The Policy Website assures that the NYU community can readily retrieve the most current versions of University policies and guidelines. If you need information from the most recent Asset Management Policies and Procedures manual, it's in there. If you want to know what your responsibilities are under the Code of Ethical Conduct, that's in there too.

Visitors to the Policy Website are offered the option to search by category, such as "Governance and Legal," "Academic Affairs and Faculty," and so forth. Clicking on a category leads to a list of links to policies related to that category. Policies that apply to more than one constituency can be accessed through each; for instance, the University Smoke Free Campus Policy appears in sections designated for Human Resources, Student Services and Academic Affairs and Faculty.

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## Training Opportunities from the Office of Equal Opportunity

by Craig Jolley

Although online training programs have become ubiquitous and we all appreciate the convenience of getting information without leaving our desks, there is no question that interacting with others face to face provides significant benefits to the learning process. NYU's Office of Equal Opportunity ("OEO") offers the University community several types of in-person educational workshops which allow participants to have meaningful discussions with their colleagues and presenters, and to get answers to their specific questions. The OEO's in-person workshops are designed to be informative, interactive, and engaging while moving participants towards targeted learning goals.

### **Training to Your Needs**

Schools or administrative units can contact the OEO and request workshops that are tailored to their needs, based on issues that have arisen or areas of concern. Workshops can address important information about discrimination, harassment, or disability accommodations. Dialogue and examples can be crafted collaboratively with the school or unit management to focus on the areas of concern. Throughout the spring and summer of 2010, the OEO developed and delivered individualized workshops for the School of Continuing and Professional Students, the College of Dentistry, the Division of Libraries, and the Office of Public Safety.

### **Regularly Scheduled Programs**

The OEO also provides regular training series that members of the NYU community can sign up for using the iLearn system at [home.nyu.edu/work](http://home.nyu.edu/work). "OEO101: Preventing Harassment on Campus," is a two-hour workshop in which participants get an overview of the recently revised NYU Non-Discrimination and Anti-Harassment Policy, which is closely aligned with federal, state and city anti-discrimination laws.

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# Payment Card Industry Data Security Standard Protects NYU 's Credit Card Information

by Ron Farrell, Norma Kenigsberg and David Tartaglia

Over recent decades, Americans have become increasingly dependent on credit cards, and the NYU community is no exception. At the Washington Square campus alone, NYU has 64 "merchant accounts" that accept credit cards for goods and/or services.

NYU is working to provide cardholders with increased security by integrating its previously decentralized system of credit card activity and increasing controls over cardholder data.

The University, in maintaining its contracted agreements with card industry members, must comply with the Payment Card Industry Data Security Standard ("PCI DSS"), an industry-wide standard established to reduce the risk of credit card fraud due to insufficient cardholder information protections.

NYU's PCI DSS project is sponsored by [Financial Operations and Treasury](#), the [Office of Compliance and Risk Management](#), [Information Technology Services](#), and the [Program Services Office](#). A project team representing these offices has been moving steadily forward in design-

ing and implementing the necessary controls to enhance protection of the University community's cardholder data.

The PCI DSS is based on a standard originally published by Visa in 2001, which has gone through several iterations and which the other major credit card companies subsequently adopted. Compliance with these standards requires the creation of a framework to continue to safeguard payment card data, including implementation of strong access control measures, regular monitoring and testing, and development of a payment card data security policy.

NYU's PCI DSS project team has documented our cardholder data environment and conducted a gap analysis and an assessment of the PCI DSS at 40 combined schools and units throughout the University. The team is now strengthening NYU's systems, including moving all card processing components to standardized, centrally supported, low risk processing methods and deploying tools to support NYU's PCI DSS Compliance Program.

The PCI DSS Compliance Program will provide information and tools to assist

NYU's merchants in validating compliance with the Data Security Standards. To assure the highest level of security, a web portal is being created to support Security Awareness Education for members of the University community whose roles or responsibilities bring them in contact with cardholder data.

A University policy has been drafted articulating specifications to safeguard against exposure and possible theft of account and personal cardholder information. The policy will help members of the community who process payment card information and handle cardholder data to conform to centrally supported secure payment processing methods and to adhere to the PCI DSS.

*Ron Farrell is Sr. Director of Treasury Systems. Norma Kenigsberg is Manager, IT Policy Development & Compliance. David Tartaglia is Project Manager of the PCI DSS Compliance Project.*

For information about NYU's Payment Card Industry Data Security Standard Program, please contact Ron Farrell, at 212/998-2778 or [ron.farrell@nyu.edu](mailto:ron.farrell@nyu.edu).

## Reminder – NYU Compliance Reporting Line

If you observe conduct at NYU that you believe is inconsistent with NYU's ethical expectations, or have questions regarding ethics or compliance at the University, you may call the Compliance Reporting Line by calling **877-360-7626** or going online to: [www.nyu.edu/about/policies-guidelines-compliance/compliance-reportingline.html](http://www.nyu.edu/about/policies-guidelines-compliance/compliance-reportingline.html).

The Compliance Reporting line accepts reports of conflicts of interest, financial and business integrity issues, misuse of University property or assets, wage claims, research related issues, and other compliance concerns. *Reports of alleged sexual, disability, or discriminatory harassment should be directed to the [Office of Equal Opportunity](#) at **212/998-2375** or by email at [equal.opportunity@nyu.edu](mailto:equal.opportunity@nyu.edu).*

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## NYU Policy Website *(continued from page 1)*

The “Advanced Search” function offers visitors the option of searching by keyword or subject. By entering the words “business expense” into the keyword search, visitors are provided with links to the Expense Reimbursement Policy, the Expenses Related to Employment Policy, the Purchasing Policies and Procedures Manual and, of course, the Business Expenses Policy.

### **Knowing You’re Current**

University policies and guidelines available through the Policy Website are actually controlled by their substantive policy owners. This means that if a Human Resources (“HR”) policy is changed on the HR webpage, the Policy Website is automatically connected with the updated version of the policy. Visitors can find the most current version of policies and link to them easily. Schools and department that publish handbooks or revise local websites for their faculty, students and/or staff can check the Policy Website before publication of new versions to make sure that their handbooks and websites contain current official University policies.

For more information about the Policy Website or for assistance with policy questions/issues, contact Compliance Manager Diane Delaney at [diane.delaney@nyu.edu](mailto:diane.delaney@nyu.edu), or visit the Policy Website at [nyu.edu/policies](http://nyu.edu/policies).

*Rebecca Holland is Associate University Compliance Officer in NYU’s Office of Compliance and Risk Management.*

## What is a ‘University Policy’?

NYU’s Policy on Policies outlines the criteria for determining if a policy is a University policy as opposed to one with more circumscribed application.

In brief, a University policy:

- *Has broad application or impact throughout the University, across colleges, schools, institutes and/or operating units;*
- *Seeks to ensure compliance with applicable laws, ethical norms, accepted best practices, promotion of operational efficiencies, enhancement of the University’s mission, and/or reduction of institutional risks; and*
- *Mandates or constrains actions.*

The Policy on Policies, promulgated by the Office of General Counsel, provides guidance on the development and applicability of University policies. It is a valuable resource for members of the NYU community who are seeking to develop University policies.

Please visit [nyu.edu/policies](http://nyu.edu/policies) for more information.

## Training Opportunities *(continued from page 1)*

Participants are educated about the different forms that harassment can take in learning and working environments. The first hour of the training focuses on discriminatory harassment, and the second hour concentrates on sexual harassment. The OEO uses hypothetical situations to show participants how to identify potential situations of harassment in their nuanced forms.

“OEO102: Supervisor’s Workshop” is a ninety minute seminar for managers and supervisors; it is best taken after mastering the information provided in “OEO 101.” Developed to educate supervisors, who are held to a heightened standard for reporting and responding to discrimination and harassment in the workplace, this workshop offers important information about expectations for managers. Both workshops are offered each month through the NYU iLearn catalog.

The OEO, which serves as the Americans with Disabilities Act (“ADA”) Coordinator and is responsible for evaluating employees’ requests for accommodations under the ADA, also offers the live workshop called “OEO110: Employees with Disabilities and Workplace Accommodations.” Designed for managers and human resources officers, the workshop provides an overview of workplace accommodations under the ADA, as well as state and city disability law. Participants will learn key concepts about responding to requests from employees with disabilities and providing reasonable accommodations. This course is offered each semester through the NYU iLearn catalog.

Managers and human resources officers who are interested in arranging for individualized OEO or ADA training should contact Craig Jolley at [craig.jolley@nyu.edu](mailto:craig.jolley@nyu.edu).

*Craig Jolley is Deputy Director of NYU’s Office of Equal Opportunity.*

# New Rules from the U.S. Department of Education

In April of this year, the United States Department of Education issued guidance for schools, through a "Dear Colleague Letter," on best practices for addressing sexual harassment or violence complaints involving students. Sexual harassment and violence are considered forms of sex discrimination under Title IX of the Education Amendments of 1972 ("Title IX"), which prohibits discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance. The "Dear Colleague Letter" put covered institutions on notice of their significant responsibility to enforce Title IX.

Schools are required to educate students about sexual harassment and violence, to make them aware of how to report incidents of sexual violence, and to encourage them to do so. The Dear Colleague Letter also made clear that once a school authority knows or reasonably should have known about possible peer sexual harassment or violence, the school must *take immediate and effective* steps to investigate and remedy the situation.

Schools must take proactive steps to prevent sexual violence, which include having a policy against sex discrimination that is distributed to the school community, designating a Title IX Coordinator, and adopting and publishing student grievance procedures for students which afford both complainants and respondents with equal opportunity to present evidence as well as to avail themselves of other procedural rights.

In response to the Dear Colleague Letter, the [NYU Division of Student Affairs and Services](#) ("Student Affairs"), in collaboration with the [Office of General Counsel](#) ("OGC") and the [Office of Equal Opportunity](#) ("OEO"), revised the University's Sexual Assault Policy.

The revised policy, which was published to students via email at the start of the Fall 2011 semester and is available on the Student Affairs website, includes existing as well as newly required elements such as: (1) a right of appeal for both complainants and respondents; (2) a provision for both parties to receive notice of an investigation's outcome; (3) application of a "preponderance of the evidence standard" to resolve complaints – meaning that findings should be based on whether the alleged harassment or violence was more likely than not to have occurred; and (4) a process for the resolution of complaints, including an informal phase that may be pre-empted by a complainant who elects to file a formal student disciplinary complaint and establishes that complaints alleging sexual assault may not be addressed through mediation.

The OEO is NYU's Title IX Coordinator and provides guidance to the Office of Student Affairs in cases of alleged peer sexual harassment. Workshops on Title IX compliance will soon be offered by the OEO, Student Affairs and the OGC.

*Tom Grace is Director of Community Standards and Compliance in NYU's Division of Student Affairs. Mary Signor is Executive Director in NYU's Office of Equal Opportunity.*

For more information about training and/or requirements in the Dear Colleague Letter or other Title IX obligations, contact Mary Signor at [mary.signor@nyu.edu](mailto:mary.signor@nyu.edu), or Tom Grace at [thomas.grace@nyu.edu](mailto:thomas.grace@nyu.edu).

The Sexual Assault Policy is found at [www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/sex\\_misconduct.html](http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/sex_misconduct.html).

**Compliance Matters** is a newsletter published by the Office the President. *Compliance Matters* is issued three times a year and provides updates about important compliance, risk management, equal employment opportunity, and disability issues.

The editors welcome ideas for articles in future issues. Please send your ideas or submissions to Rebecca Holland at [rebecca.holland@nyu.edu](mailto:rebecca.holland@nyu.edu) or Diane Delaney at [diane.delaney@nyu.edu](mailto:diane.delaney@nyu.edu). Previous issues can be found by visiting the [Office of Compliance and Risk Management Services](#) page or by clicking [here](#).