

ADMINISTRATIVE COMPLIANCE ASSESSMENT QUESTIONNAIRE

Internal Control Self-Assessment Questionnaire

PURPOSE:

As a Tufts University director, manager or administrator it is important to periodically determine if good business practices are being observed within your department. You may have been asked to complete this questionnaire as part of a scheduled internal audit or “Team Risk Assessment” that is being facilitated by Audit & Management Advisory Services. However, if your organization is not currently being audited, we encourage you to complete this questionnaire on your own to independently evaluate the adequacy of various internal controls and business practices that support your responsibility area. Use your responses to determine which internal controls are effective or need to be strengthened.

Specifically, completing the questionnaire will help to:

- ◆ Identify operating areas within your department where required business policies, administrative processes and regulatory compliance are important;
- ◆ Assess the adequacy of existing policies and procedures and other internal controls that are designed to ensure compliance in each of the identified areas;
- ◆ Raise awareness concerning certain efficiencies and cost saving opportunities that result from complying with Tufts university-wide policies and procedures.

We encourage you to engage your co-workers in brain-storming ways to address areas where you believe certain internal controls need to be improved.

HOW TO COMPLETE THE ASSESSMENT QUESTIONNAIRE:

- **Please complete the questionnaire below. Use the links to move more easily between the table of contents and the questionnaire sections.**
- **If certain sections of the questionnaire do not apply to your organizational activities, leave them blank.**
- If the questionnaire has been requested of you by AMAS, hit the “Email” button at the end of the questionnaire in order to automatically send it back with your responses to AMAS.
- If you are completing the questionnaire for your own self- assessment, there is no need to forward it to AMAS; you may save a copy for your files.
- If you have any questions related to the items covered in the self-assessment questionnaire, please contact Seth Kornetsky, the Director of Audit & Management Advisory Services at extension 7-2068 or via email at seth.kornetsky@tufts.edu.

ADMINISTRATIVE COMPLIANCE ASSESSMENT QUESTIONNAIRE

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ADMINISTRATIVE COMPLIANCE SELF-ASSESSMENT QUESTIONNAIRE

Internal Control Assessment Questionnaire Provider Information

Department:	
Department ID:	
Date:	
Name:	
Phone:	
Email:	

		YES	NO	Do Not Know	COMMENT
A	ORGANIZATIONAL GOVERNANCE				Return to Table of Contents
1	Does your department/organization have a written mission statement?				
2	Does management clearly communicate and demonstrate integrity and other ethical values consistent with the University's business conduct policy?				
3	Does your department have an organizational chart that defines lines of authority and responsibility?				
4	Is the organizational chart up to date?				
5	Has your department documented all internal policies and procedures that are related to performing all significant administrative processes specific to your department or division's operations?				
6	Are these policies and procedures reviewed and up to date?				
7	Do you believe that responsible persons in your department are sufficiently familiar with university-wide policies related to personnel management, financial matters, use of information and related technology, and regulatory compliance?				
8	Are administrators within your department aware of how to access on-line policies and procedures from Human Resources, Finance, Procurement, the Public Safety Office, Research Administration and other key areas of the University?				
B	FINANCIAL PLANNING AND MONITORING				Return to Table of Contents
1	Are funding sources evaluated annually to assess the sustainability of current funding levels?				
2	Does the budget process include key members of management?				

		YES	NO	Do Not Know	COMMENT
3	Are one or more individuals in your department responsible for reviewing the department's monthly PeopleSoft financial reports?				
4	Do these individuals know how to access the PeopleSoft on-line financial folders that are made available monthly?				
5	Indicate how often the contents of these folders are reviewed: <input type="checkbox"/> Monthly <input type="checkbox"/> Every few months <input type="checkbox"/> Infrequently				
6	Does your department prepare an annual financial report?				
7	Are managers held accountable for financial performance?				
8	Are one or more individuals in your department responsible for reviewing the department's monthly PeopleSoft financial reports?				
9	Do these individuals know how to access the PeopleSoft on-line financial folders that are made available monthly?				
10	Indicate how often the contents of these folders are reviewed: <input type="checkbox"/> Monthly <input type="checkbox"/> Every few months <input type="checkbox"/> Infrequently				
11	Does your department prepare an annual financial report?				
12	Are managers held accountable for financial performance?				
C	PERSONNEL				Return to Table of Contents
1	Are up-to-date Position Description Questionnaires (PDQ's) available for each employee in the organization?				
2	Are sufficient training opportunities provided to improve employee work related competencies in accordance with the @Work Program?				
3	Are responsibilities divided among staff members (so that no single employee controls all steps of a financial transaction) thereby maintaining appropriate segregation of duties? (If inadequate segregation of duties does exist, please indicate the process or transaction affected in the <i>Comments</i> section.)				
4	If segregation of duties is not practical, does supervisory oversight exist at any level over these financial transactions?				
5	Has the department established cross-training or contingency plans for significant changes in personnel?				
6	Are Time Entry records pertaining vacation and sick leave up to date?				
7	Are overtime hours, and other special work requirements (on-call, shift premium) reviewed and approved in advance by the employee's supervisor?				
8	Are annual performance evaluations given to departmental employees in accordance with the University Tufts@Work program?				

		YES	NO	Do Not Know	COMMENT
9	Have procedures been established to ensure that terminating employees return all University ID cards, keys, laptops, purchasing/travel related credit cards, equipment, etc., and that appropriate systems administrators are notified to remove all logon privileges to departmental and University systems?				
10	Are PAFs completed promptly and submitted to the HR Service Center for new hires and changes in employment status?				
12	Are employees sufficiently trained to perform assigned roles and responsibilities to support payroll processing (time reported, on-line time entry, etc.)?				
13	Are payroll reports monitored to identify unapproved time, miscodings, etc.?				
D	BUSINESS CONDUCT POLICY				Return to Table of Contents
1	Are all department personnel aware of the University's Business Conduct Policy and where to find it on the Tufts web page?				
2	Are all faculty and staff members in your department or organization aware of the Tufts Conflict of Interest Policy that requires employees to avoid conflicts (or any appearance of conflicts) between their personal interests and those of the University?				
3	Do you know of any individual(s) in your department who, because of the nature of his or her position should be asked to complete an annual Conflict of Interest Disclosure Statement?				
4	Are all department personnel familiar with the policy on Gifts, Entertainment & Gratuities?				
E	REPORTING OF FRAUD/ FRAUD INDICATORS				Return to Table of Contents
1	Until completing this questionnaire did you know that any instances of suspected fraud should be reported to the Director of Audit & Management Advisory Services or reported using Tufts' reporting hotline (see below)? (Any thefts of cash or physical assets should be reported to the Director of Public Safety Office/Campus Police.				
2	Have any unusual trends or discrepancies in department accounts been recently detected?				
3	Are there any important financial reconciliations that are not being routinely performed that should be?				
4	Are there any department assets (property, equipment, supplies, etc.) that you believe are not adequately protected against theft or misuse?				

		YES	NO	Do Not Know	COMMENT
5	Have any missing numbers in sequences of numerically controlled documents been recently identified?				
6	Until completing this questionnaire were you aware that a website exists to report suspected instances of employee misconduct and that it can be done anonymously? : https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7182 . Access is also toll-free: (866)-384-4277				
F1	INFORMATION TECHNOLOGY				Return to Table of Contents
1	Are all department personnel familiar with the Tufts Information Technology Responsible Use Policy?				
2	Are all department workstations upgraded with the latest security patches and virus protection?				
3	Is critical information backed-up and stored off-site?				
4	Is sensitive information protected by operator ID/password?				
5	Are all passwords adequately controlled and protected from unauthorized use?				
6	Are passwords kept confidential (i.e., not shared or posted at work sites)?				
7	Are you aware of any “default” passwords that are still being used for any IT applications rather than having been changed to more secure, personal passwords?				
8	Are computer applications logged-off when the user is going to be away from the terminal or PC for an hour or more?				
9	Are computers and servers maintained in a secure area?				
10	Are laptop computers secured when not in use?				
11	Are electrical surge suppressers used on all computer equipment?				
12	Is each departmental server equipped with an Uninterrupted Power Supply (UPS)?				
13	If a department has a critical information system that is connected to an outside network, is it protected by a firewall?				
14	Is all software properly licensed using either a site or individual licensing arrangement?				
15	Has a disaster recovery/business resumption plan been developed should one of your critical information business systems fail or be destroyed?				
16	Has the disaster recovery/business resumption plan been tested/simulated and if so, when (indicate in <i>Comments</i> section)?				

		YES	NO	Do Not Know	COMMENT
F2	INFORMATION CONFIDENTIALITY AND DATA PRIVACY				Return to Table of Contents
1	Are all department personnel familiar with the Tufts Business Conduct Policy’s requirements concerning the handling of private and confidential University information?				
2	Do your computers/applications contain any of the following combinations of confidential data elements that are considered to be “ <i>individually-identifiable</i> ” information that could be used to assist with identify theft? 1) Name & Social Security # 2) Name & Date of Birth 3) Name & Bank Account # 4) Name & Credit Card # 5) Name and Mother’s Maiden-name 6) User ID & Passwords for University Systems? (NOTE: List those combinations in use by number in the Comment section)				
3	Do your computers/applications contain private or confidential information about students?				
4	Do your computers/applications contain private or confidential information about faculty/employees?				
5	Do your computers/applications contain private or confidential information about donors?				
6	Do your computers/applications contain private or confidential information about clinical patients?				
7	Do your computers/applications contain private or confidential information about research participants/protocols?				
8	Does your area collect any (as defined above) individually-identifiable private or confidential University information on paper forms or records?				
9	Do these paper forms/records contain private or confidential information about students?				
10	Do these paper forms/records contain private or confidential information about faculty/employees?				
11	Do these paper forms/records contain private or confidential information about donors?				
12	Do these paper forms/records contain private or confidential information about patients?				
13	Do these paper forms/records contain private or confidential information about research participants/protocols?				

		YES	NO	Do Not Know	COMMENT
14	<p>Do these paper forms/records contain any of the following combinations of confidential data elements that are considered to be “<i>individually-identifiable</i>” information that could be used to assist with identify theft?</p> <p>1) Name & Social Security # 2) Name & Date of Birth 3) Name & Bank Account # 4) Name & Credit Card # 5) Name and Mother’s Maiden-name 6) User ID & Passwords for University Systems?</p> <p>(NOTE: List those combinations in use by number in the Comment section)</p>				
15	Are these paper forms/records stored in secure cabinets that prevent unauthorized personnel from gaining access to this data?				
16	If you maintain information related to students, have you received FERPA training?				
17	If you maintain information related to patients, have you received HIPAA training?				
18	If you maintain information related to direct lending of Tufts student loans, have you received Gramm-Leach-Bliley Act (GLBA) training?				
19	Does your department accept payment via credit card?				
20	If you answered yes to question 19, are you utilizing a Sallie Mae portal?				
G	BANK ACCOUNTS/PETTY CASH				Return to Table of Contents
1	Does your department have a checking account with an outside banking institution?				
2	If yes, what it is used for? (use comments section)				
4	Does your department maintain a petty cash fund? If yes, what is the amount of this fund? (use comments section)				
5	Was this petty cash fund established with the approval of the Finance Division?				
6	Do more than two individuals have physical access to the petty cash fund cash box or safe? (If so, how many?) (use comments section)				
7	Is the petty cash fund maintained in a safe or lockable cash box and stored in a secured place?				
8	Is supporting documentation provided for all petty cash disbursements?				
9	Is the petty cash fund reconciled and replenished at least monthly? (If not, please indicate how often)				

		YES	NO	Do Not Know	COMMENT
10	Does a person other than the fund custodian reconcile the fund or perform an independent review of the reconciliation?				
H	CASH RECEIPTS/REVENUE				Return to Table of Contents
1	Does adequate segregation of duties exist within your department between staff members responsible for receiving, depositing and reconciling cash and checks?				
2	Are all checks made payable to - Trustees of Tufts College?				
3	Are all checks restrictively endorsed immediately upon receipt with a stamp, “For Deposit Only – Trustees of Tufts College?”				
4	Are checks photocopied or is a cash receipt log maintained to create supporting documentation to which you can reconcile deposits?				
5	If cash is accepted, are pre-numbered receipts used to track payment?				
6	Are all unused pre-numbered receipts/tickets accounted for?				
7	Are deposits of funds made on the next business day?				
8	When funds cannot be deposited daily, are they transported or stored in a secure location at the end of the workday?				
9	Are cash and checks adequately protected when transferred to the Bursar’s Office or bank?				
10	Is there adequate physical security where cash handling activities occur?				
11	Are all cash or checks gifted to the University forwarded to the Advancement Office for gift processing?				
12	If you have any revenue generating activities, have you consulted with the Finance Division to determine if any of the revenue is subject to unrelated business income tax (UBIT)?				
13	Has your Department consulted with the Finance Division concerning whether sales tax should be charged to customers and how it should be deposited?				
I	TRAVEL AND BUSINESS EXPENSES				Return to Table of Contents
1	Are members of your department aware of the Finance Division’s online Travel & Business Expense Policies and Procedures?				
2	Do you know of any instances of non-compliance with policies for reimbursing travel and entertainment expenses in accordance with the University’s Travel and Business Expense Reimbursement policy and sponsored agency regulations?				

		YES	NO	Do Not Know	COMMENT
3	Are travel plans made sufficiently in advance to obtain the most favorable transportation rates?				
4	Is all overnight travel authorized in advance by the traveler's Department Head, Supervisor or Director?				
5	Are all departmental travel arrangements made through the University's authorized travel agency?				
6	Are you aware of any travel/business expense reimbursements that were made for any unallowable expenses not in accordance with University policy and Federal regulations?				
7	Do reimbursement requests include exchange rates for receipts submitted for international travel?				
8	When traveling internationally on federally funded grants, are any international carriers being used when departing from/to the United States?				
9	Does someone in your department review travel and meeting expense reports to ensure alcohol expenses are not charged to federally funded grants?				
10	Are travelers required to provide original receipts for all travel expenses over \$25 per day?				
11	Are copies in lieu of original receipts ever submitted by travelers in your department?				
12	Are all requests for business and entertainment expenses documented in terms of how the activity was University or business related, including a listing of attendees (with titles)?				
J	PROCUREMENT CARDS (Pcard)				Return to Table of Contents
1	Have Pcards been issued to all department personnel who are responsible for procurement?				
2	Are Pcards being used for all qualified purchases under the current limit of \$5,000?				
3	Has a formal reconciliation protocol been established for each cardholder to reconcile his or her monthly Pcard statements with packing slips, invoices or register receipts? (Note: Certain charges may be automatic such as water or cell phone services.)				
4	Is documentation of Pcard activity, including supporting documents, sorted and stored by Month and/or Cardholder and by Pcard Transaction report?				
K	PROCUREMENT OF GOODS AND SERVICES				Return to Table of Contents
1	Does your department rely on the Purchasing Department to coordinate bids for goods and services?				

		YES	NO	Do Not Know	COMMENT
2	Does the department obtain 3 competitive written bids for any purchase that exceeds \$10,000 and verbal quotes for purchases between \$5,000 and \$10,000?				
3	Does the department maintain and forward to Purchasing any sole source or preferred vendor justifications for purchases exceeding \$10,000 that are not bid?				
4	Does the department reconcile purchases/goods received to their monthly financial statements?				
5	Do you ever pay a state sales tax on your purchases?				
6	Does your department split orders to avoid higher approval levels or to bypass limits, (i.e. Pcard limits or bidding levels)?				
L	RECORDS RETENTION				Return to Table of Contents
1	Has your department conferred with the University Digital Collections and Archives department to determine an appropriate records retention policy for your area?				
2	For documents or reports not produced in your department, have you determined who the owner or producer is and consulted with University Digital Collections and Archives department regarding how long your copies of these documents or reports should be retained?				
3	Are important documents, including electronic media, stored in a secure area with adequate protection from fire and/or water damage?				
M	INVENTORY CONTROL				Return to Table of Contents
1	Are inventory items maintained in a secure location?				
2	Is there adequate protection from fire and water?				
3	Is inventory well organized?				
4	Is flammable material stored according to code in a special fireproof cabinet and kept in an isolated location?				
5	Are any controlled substances stored and dispensed according to Drug Enforcement Agency (DEA) regulations?				
6	Are receiving documents matched to purchase orders and invoices?				
7	Are all materials received counted and inspected prior to entry on storeroom/inventory records?				
8	Are back-ordered items properly followed up on to ensure timely receipt of items ordered?				
9	Are withdrawals from stock made only upon receipt of approved documentation, (i.e., IDR's, work orders, etc.)?				
10	Are inventory records maintained based on periodic physical counts or a perpetual system?				
11	Are automatic reorder quantities used to replenish stock?				

		YES	NO	Do Not Know	COMMENT
12	Have formal procedures been established for reviewing and disposing obsolete and slow-moving inventory items?				
13	Are there currently any items in stock that are obsolete or slow-moving?				
14	Is a physical inventory conducted at least annually?				
15	Are items physically counted matched against inventory records?				
16	Has a cycle counting program been considered?				
17	Are inventory records adjusted immediately based on the results of a physical inventory or cycle counting program?				
18	Do individuals independent of inventory custody investigate unusually large discrepancies, between inventory records and physical counts?				
19	Is any inventory stored or consigned at an outside location?				
N	BUILDING SAFETY & SECURITY				Return to Table of Contents
1	Have all concerns about the safety of the building(s) been brought to the attention of the individual or group responsible for building safety (e.g. lack of building exit routes, trained safety monitors, regular evacuation drills)?				
O	COMPLIANCE WITH FEDERAL AND STATE GOVERNMENTAL REGULATIONS				Return to Table of Contents
1	Do you believe that department personnel are sufficiently informed about important federal and state laws and regulations that govern activities performed within your department?				
2	Please answer for each of the following that applies: Does your department participate in activities that are governed by:				
	• Occupational Safety and Health (OSHA)				
	• Environmental Protection Agency (EPA)				
	• A-21 Federally Funded Research				
	• Protection of Human Subjects				
	• Protection and Use of Animals in Research				
	• Scientific Misconduct				
	• IRS				
	• HIPAA				
	If you answered 'YES' for OSHA				Return to Table of Contents
1	Have employees been trained for workplace safety by the Environmental Health & Safety Office (EH&S) to comply with the appropriate regulatory requirements for their job responsibilities?				

		YES	NO	Do Not Know	COMMENT
2	Does your department have a policy of conducting (or requesting) periodic walk-through inspections of workspaces to identify and correct any unsafe or potentially hazardous conditions and work practices that could result in OSHA violations in consultation with the Office of Risk Management?				
	If you answered 'YES' for EPA				Return to Table of Contents
1	Has the EH&S notified your department about how to avoid hazards in the handling of hazardous materials and emergency response procedures?				
2	Does your department, research or teaching labs perform any activities using bio-hazardous agents, hazardous chemicals or radioactive material?				
3	If so, are they properly labeled and stored?				
	Are records maintained concerning inventories of these materials?				
4	Do you believe that adequate security exists over access to any bio-hazardous, radioactive or other hazardous materials?				
5	Has all hazardous waste been stored and disposed of in accordance with federal regulations and University policy as managed by EH&S?				
6	Do all individuals working with radioactive materials wear monitoring badges?				
7	Do you know of any teaching or research labs within your school that might represent a health or safety risk due to poor housekeeping practices?				
8	Do individuals in your teaching and research labs know how to correctly respond to a hazardous spill or chemical release?				
9	Are you aware of any violations of any existing hazardous materials storage laws or documentation requirements for using such materials?				
	If you answered 'YES' for A-21 Federally Funded Research				Return to Table of Contents
1	Are all grant proposals reviewed and approved by the Department Chair, appropriate Dean, Grants and Contracts Administration Office, and, when required, the Budget and Fiscal Officer or Director of Corporate/Foundations Relations before they are submitted to granting agencies?				
2	Has <i>all</i> (sponsored and un-sponsored) recombinant DNA research and research involving biohazards been reviewed and approved by the Institutional Bio-Safety Committee (IBC), as mandated by Federal Guidelines and state, city and other local ordinances?				

		YES	NO	Do Not Know	COMMENT
3	Do you believe that your department's principal investigators (PIs) and project directors are sufficiently familiar with A-21 cost principles governing allowable costs and activities?				
4	Do you believe that your department's principal investigators and project directors are sufficiently familiar with Tufts' policies and guidelines for charging administrative or clerical salaries and other administrative costs to federal grants and contracts?				
5	Do you believe that principal investigators require additional training concerning effort reporting requirements to ensure that salaries charged to federal grants and contracts properly reflect the time and effort directed to the grant or contract activities?				
6	Do you know of instances where principal investigators are not signing off on Quarterly Effort Reports for those individuals who work on their grants and contracts?				
6	Do you believe that principal investigators and project directors require additional training concerning Tufts' policies and procedures regarding purchasing, procurement card usage, capital equipment requests, and travel and business expense reimbursement as they relate to charging federal grants and contracts?				
	If you answered 'YES' for Protection of Human Subjects				Return to Table of Contents
1	Do you know of any principal investigators who require additional training addressing the rights and welfare of human beings as stated under the <i>Code Of Federal Regulations, Title 45: Public Welfare - Department Of Health And Human Services, National Institutes Of Health and Office For Protection From Research Risks; Part 46: Protection Of Human Subjects "Common Rule", 45 CFR 46?</i>				
2	Are all principal investigators familiar with University policy regarding the use of Human subjects in research as outlined in http://www.tufts.edu/central/research/HumanCare.htm ?				
3	Are you aware of any research protocols involving human subjects, whether funded from federal sources or not and including teaching and student protocols, that were not reviewed and approved by either the Medford Campus or Boston Campus Institutional Review Boards?				
4	Are principal investigators adequately trained to follow the guidelines and regulations posted by the DHHS Office for Human Research Protections (http://www.hhs.gov/ohrp/)?				

		YES	NO	Do Not Know	COMMENT
5	Do you know of any current research protocols involving the use of children and special populations (mentally handicapped, pregnant women, etc.) as human subjects?				
6	Have there been any issues related to principal investigators not complying with University and federal regulations pertaining to Informed Consent for all research protocols involving human subjects?				
7	Have there been any issues related to principal investigators not properly following University and federal regulations concerning advertising and compensating human subjects?				
8	Are adverse reactions reported promptly to the Institutional Review Board to avoid potential risk to subjects and liability to the University?				
	If you answered 'YES' to Protection and Use of Animals				Return to Table of Contents
1	Do you believe that principal investigators in your department require additional training pertaining to Tufts' policies regarding use of animals in research found at the Tufts web site: http://www.tufts.edu/central/research/AnimalCare.htm ?				
2	Do you believe that Principal Investigators in your department require more training pertaining to Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals as administered by the Office of Laboratory Animal Welfare (OLAW, formerly Office for Protection from Research Risks, Division of Animal Welfare) at the National Institutes of Health?				
3	Are all research protocols using animals, including teaching protocols, reviewed and approved by the University Institutional Animal Care and Use Committee (IACUC), whether or not they are funded by an outside source?				
4	Have all principal investigators conducting research that uses animals provided assurances to the IACUC as outlined at http://www.tufts.edu/central/research/AnimalCare.htm ?				
5	Have all principal investigators received adequate training concerning occupational risks specific to the handling of animals in research (see general OSHA questions above)?				
6	Have principal investigators housing their own animals been provided with the animal housing and handling guidelines set forth in the USDA <i>Guide for the Care and Use of Laboratory Animals</i> ?				
	If you answered 'YES' to Scientific Misconduct				Return to Table of Contents

		YES	NO	Do Not Know	COMMENT
1	Have researchers been provided with or directed to Tufts' scientific misconduct policy found at the Office of the Vice Provost web site http://www.tufts.edu/central/research/Misconduct.htm ?				
2	Have researchers been provided or directed to the DHHS fact sheet "Promoting Integrity in Research" outlining responsibilities of researchers and institutions and obligations to report scientific misconduct http://www.hhs.gov/news/press/1999pres/991022a.html)?				
3	Are new researchers familiar with what constitutes scientific misconduct (e.g., falsification of data, plagiarism, theft of ideas and violation of statutes and regulations applicable to scientific research)?				
4	Has your department posted information on how to report suspected instances of scientific misconduct?				
	If you answered 'YES' to IRS				Return to Table of Contents
1	Is your head department administrator sufficiently familiar with federal and state tax regulations that pertain to department operations (e.g., HR - federal employment taxes, social security, COBRA, foreign students, pension requirements; check writing/AP functions - independent contractors, abandoned property and sales tax)?				
2	Has department management contacted the University Controller's office with any questions regarding potential tax liabilities?				
	If you answered 'YES' to HIPAA				Return to Table of Contents
1	Does your department administer health plans or retain medical records for faculty, staff or students or for human subjects related research?				
2	Does your department maintain any confidential employee/student and human subject research records that require special treatment for privacy protection?				
3	Do you believe that refresher HIPAA training would benefit individuals responsible for providing treatment or maintaining confidential medical records?				

Comments