

Welcome to the 2026

COMPLIANCE SUMMIT



Office of Compliance,
Ethics and Policy

UNIVERSITY OF COLORADO **BOULDER**

Lydia Darlington

Office of Compliance, Ethics and Policy



Office of Compliance,
Ethics and Policy

UNIVERSITY OF COLORADO **BOULDER**

COMPLIANCE
SUMMIT

Registrar Compliance: Student Data Privacy, Tuition Classification and More!

Kristi Wold-McCormick

Assistant Vice provost and University
Registrar | Office of the Registrar, Enrollment
Management

Reid Kallman

Associate Registrar | Office of the Registrar,
Enrollment Management

COMPLIANCE
SUMMIT

Office of the Registrar Compliance

FERPA , Residency and more

Be Boulder.



University of Colorado **Boulder**

Kristi Wold-McCormick, Ph.D.

Assistant Vice Provost and University Registrar

Reid Kallman

Associate Registrar, Enrollment & Records
Services

What is FERPA?

- Federal law since 1974
- Defines appropriate use and release of **student education records**
- Applies to all educational agencies/institutions that receive funds administered by the Secretary of Education
- Some of FERPA law is black/white, but much is left up to institutional interpretation and definitions



Student Rights Under FERPA

1. Right to review and inspect their education records maintained by the university
 - Must comply and provide access within 45 days
 - Copies do not need to be provided
2. Right to seek amendment to records they believe are incorrect
3. Right to control disclosure of education records and personally identifiable information (PII)
4. Right to file a complaint with the Student Privacy Policy Office (U.S. Department of Education)

What's an Education Record?

Education Records

- Any records maintained that are directly related to a student
- Academic Records, financial records, advising records, class records, etc.
- Records may in in any medium
- Includes records maintained by contracted party acting on behalf of an institution

NOT Education Records

- Law enforcement records created for a legal purpose
- Employment records, unless based on student status (work-study, TA/GA)
- Medical/treatment records
- Sole possession notes
- Post-enrollment/alumni records

Who May Access an Education Record?

- The student (own record)
- Third party with student's documented consent
- School official with **legitimate educational interest** (faculty, advisor, registrar)
- A person in response to court-ordered subpoena
- Employee/contractor to perform designated job
- An institution where a student seeks to enroll
- Federal/state/local education authorities
- Accrediting bodies (HLC, ABET, etc.)
- Officials involved in health/safety emergencies



What is Directory Information?

Directory Information

- Not generally harmful or an invasion of privacy if disclosed
- **MAY** be released without student consent (unless restricted by student)
- Examples: Name, major, hometown, degree earned

NOT Directory Information

- Confidential student record maintained by an institution
- May not be released without student consent
- Examples: Date of birth, SSN, citizenship, grades



CU FERPA Interpretations

CU Directory Information

- Student name
- Campus email address*
- Hometown (city, state)
- Enrollment status
- Classification Level (junior, grad)
- Previous institutions attended
- Dates of attendance
- School/college/division
- Majors, minors, fields of study
- University honors/awards
- Degree status (expected graduation/conferral dates/terms)
- Employment related to student status
- Participation in recognized activities & sports
- Photos/videos maintained by university

****Address, phone are NOT considered directory info..***



FERPA v. CORA

- Under FERPA, institution may refuse disclosure of directory information to third parties if not in the student's best interest
- Colorado Open Records Act may be withholding information more difficult
 - cora@colorado.edu (registrar, legal, communications review)
- Institutional qualifier to release directory info:
 - *Disclosure of campus email addresses is limited to requestors who agree not to use the campus email addresses for solicitation*

Note: There are also Freedom of Information Act (FOIA) requests, but those only apply to records held by federal agencies (i.e., federally funded grants)

‘Eligible’ vs ‘Enrolled’ Student

- FERPA rights transfer from parent to student when student becomes ‘eligible’ at age of 18 OR when they become ‘enrolled’ regardless of age
- **CU defines a student as ‘enrolled’ on the first day of their first semester of attendance**
- Parents may access education records if student is a tax dependent of either parent (proof required)
- FERPA rights end when a student is deceased



SallyP Your Highness

Student ID

Your Profile

Account Settings

[IdentiKey, Password and Email](#)

[Profile and Privacy](#)

Register to Vote

LOGOUT

Students Control Access

- **Full Privacy**

- Submit signed request to Registrar to suppress release of data
- Clearly indicated in portal, student systems

PRIVATE

- **Consent to Release**

- Students may authorize select third parties to discuss or request their education records (BuffPortal - security questions/answers)

- **Guest Access**

- Students may authorize select third parties to view select education record directly (schedule, grades, holds, major, advisor, etc.)

- **Security Passphrase**

- Students may set passphrase to provide to school officials in place of a photo ID (financial aid, bursar, registrar, etc.)

Ethics and Compliance: Shared Responsibility



- It's the Law - Compliance is required of ALL employees
- Students own their data; we safeguard it
- Students control access to and release of their education records, including to parents
- Students rely on us to protect their data privacy
- It's the right thing to do
- Protects against unfair or unlawful advantages or disadvantages
- Secure systems and transmission of data

FERPA is ubiquitous

- In the classroom
 - online instruction (video recordings)
 - grading
- In advising
- In use of Artificial Intelligence (see CU Boulder AI page)
- In vendor contracts (i.e., software)
- In student emergencies or conduct matters (police investigations)
- In disabilities and accommodations
- In use of email and social media
- In recommendation letters
- In how student records are stored/destroyed (electronic or paper)



Do

- Know the difference between directory and non-directory info
- Know that students may grant or restrict access
- Confirm if student has FERPA restriction before talking to requestor
- Know student rights under FERPA
- Contact registrar or legal if unsure
- Report any violations

Don't

- Make non-directory info available to third parties without student consent (including parents)
- Give out ANY info on students with restricted directory
- Leave student info out in open (desks, copiers, monitors)
- Discuss sensitive student info in public for others to hear

Questions?

Knock knock
Who's there? ~FERPA

FERPA who?

Sorry, I can't tell you
that....



Test Your FERPA Knowledge

(if time permits)

For More FERPA Info

Registrar-hosted FERPA training (virtual)

Tuesday, September 29, 2-3 pm

Register to get link for session:

<https://calendar.colorado.edu/event/fall-2026-online-ferpa-training-for-faculty-staff>

Tuition Classification Basics

Tuition Classification

Tuition classification determines whether a student is billed **In-State (Colorado Resident) tuition** or **Out-of-State (Colorado Nonresident) tuition**

Governing Principles:

- Governed by Colorado law / statutes
- Applied consistently across CO public institutions
- Administered by the university in accordance with state law

How is TC Determined?

- Through establishing domicile in CO or through a Residency Exception
 - Some students are **eligible for in-state immediately** when they enroll.
 - Some become **eligible later** in their enrollment.
 - Some will **not be eligible** for in-state at any point during their enrollment.

Because this is a law...

The Burden of Proof is on the petitioner to prove qualifications.

One cannot establish a domicile in Colorado solely for the purpose of changing classification for tuition purposes from out-of-state to in-state.

Student or Resident?



Only Qualified Persons May Establish Residency

A *qualified person* is eligible to begin the one-year process to establish a Colorado domicile.

By law, a qualified individual is:

- 22 years of age (to petition: 23 by first day of class)
- Enrolled in a graduate level program
- Married
- Adult Parent of a minor
- An emancipated minor

Domicile

Legal term describing the one place where a person has chosen to make their true, fixed and permanent home.

Domicile includes both Physical Presence & Intent

Physical Presence

- Place of residence, permanent rather than temporary
- must be established for **12 continuous months** on or prior to the first day of class
- Must move to Colorado by the posted qualifying date

Intent

Proven by severing ties to former state and obtaining Colorado ties:

- Driver's license or Colorado ID (within 120 days of move to CO)
- Vehicle registration in CO (within 180 days of move to CO)
- Voter registration in CO
- Employment/filing of Colorado state income taxes
- Colorado address on important documents

Petition Types and Exceptions:

Petition Types:

- Adult Students
- Dependent Students (Parents are Residents)
- Emancipated Students

Exceptions in the state Law:

- ASSET students – undocumented, US citizens and permanent residents who graduated from CO high school and attended for at least one year
- Graduate students in the Western Regional Graduate Program
- CO National Guard members, active duty military members, honorably discharged veterans residing in CO
- Special immigrants and refugees
- U.S. Olympic athletes
- Served in the Peace Corp Volunteers
- Members of American Indian Tribes with historical ties to CO
- And more....

Athletic Academic Compliance

- Full-time staffer who works closely with Athletics Compliance, Coaches and Admissions
- Determines if students are meeting academic eligibility requirements per NCAA and Big12 rules
 - Minimum credits, GPA and progress toward degree
 - Determines eligibility to practice and compete
 - Certifies each team roster each season for eligibility
- Academic Progress Reports (APR)
 - Measures, reports academic success and eligibility of D1 student athletes over time

Other Federal/State Legislation

- Colorado laws enforced by CDHE
 - Enrollment Management (Registrar, Admissions and Financial Aid)
 - Transfer credit
 - Prior Learning Credit
 - Reporting Requirements
- Federal
 - One Big Beautiful Bill (OB3)
 - Program Lengths
 - Duration of Stay

Contact us with Questions

Reid Kallman, Associate Registrar

Reid.kallman@colorado.edu

Kristi Wold-McCormick, University Registrar

kristi.woldmccormick@colorado.edu

Signature Authority

Patricia Santiago

Associate Director of Fiscal Compliance | Campus Controller's Office

Agenda



Policy

Matrix

Tips

Q&A





Policy

Which agreements are NOT covered?

Agreements between departments of CU Boulder

Administrative or operational agreements

Faculty and staff personnel documents

Contracts involving financial arrangements that must be executed by the University Treasurer.

banking contracts
revenue bonds
vendor contracts involving foreign currency

credit card contracts
leasing arrangements





Policy

Who can sign?

You are listed in the Matrix as the Signing Authority or the Delegate
(at the time the contract is signed)

You are acting within the scope of your University role





Policy

What are my responsibilities if I sign?

- Ensuring the contract has a valid business purpose
- Understanding the provisions of the Agreement and performing due diligence
 - How do our policies and procedures affect the terms and conditions in the agreement?
 - Do we have enough funds to pay for an expenditure?
 - Are there conflicts of interest, and have they been mitigated?
- Understanding the business risks and whether they can be mitigated
 - Does the agreement require any specific type of insurance?
 - Is there an information security risk?
 - Does it carry reputational risk?





Policy

What are my responsibilities if I sign?

- Consulting with subject matter experts, if you have concerns
 - University Risk Management
 - Office of Information Technology
 - Global Engagement Office
 - Campus Controller's Office
 - OCG
 - Venture Partners
 - Export Controls Office
 - Office of Budget and Finance
- Ensuring that all required reviews and approvals have been obtained and documented
 - Internal reviews
 - Legal reviews





Policy

What are my responsibilities if I sign?

- Initiating the signature process
- Providing the contractor with a signed copy
- Retaining a signed original copy in accordance with record retention requirements
- Ensuring compliance with Agreement terms as well as applicable law and University policy



Example

Are Automatic Clearing House (ACH) payments covered by the new Signature Authority Policy?

No. Under the ACH Payment and Security Policy, the Treasurer is ultimately responsible for approving, releasing, and funding ACH payments.

The Bursar's Office can request ACH credit transfers under the same policy, but all payments and banking instructions must have the Treasurer's *approval* before they are executed.

Therefore, ACH payments are an exempt transaction.





Matrix

How do I use the Matrix?

2. Signature Authority and Delegation Matrix

The signature authority matrix serves as the single, comprehensive source for valid signature authority, unless otherwise exempted or reserved. The matrix rescinds and supercedes all previous delegations of signature authority.

+ Vendor Agreements

+ Non-Procurement Expenditure Agreements

+ Non-Research Revenue Agreements

+ Non-Revenue Business Agreements

+ Real Property Agreements

+ Sponsorship Agreements

+ Other Agreements

(Version 1; Effective Date: 8/1/2024)





Matrix

How do I use the Matrix?

Category of Contract	Business Review	Legal Review	Position with CU Boulder Signature Authority	Ability to Delegate	University of Colorado Approval
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Matrix

How do I use the Matrix?

Business Agreements (Non-Procurement, Non-Expenditure, Non-Revenue, Non-Research)

All other agreements that do not produce costs or revenue for the university, and do not involve sponsored research or sponsored projects.

Category of Contract	Business Review	Legal Review	Position with CU Boulder Signature Authority	Ability to Delegate	University of Colorado Approval
Non-Revenue Business Agreements a) MOUs and MOAs b) Affiliation Agreements c) Barter Agreements d) Non-Disclosure Agreements	Originating Department, Campus Controller's Office	Boulder Office of University Counsel	Executive Vice Chancellor for Academic Affairs and Provost OR Senior Vice Chancellors from the Originating department	Yes Members of Chancellor's the Cabinet	Not Required





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a) MOUs and MOAs			OR	Members of Chancellor's the Cabinet	
b) Affiliation Agreements			Senior Vice Chancellors from the Originating department		
c) Barter Agreements					
d) Non-Disclosure Agreements					





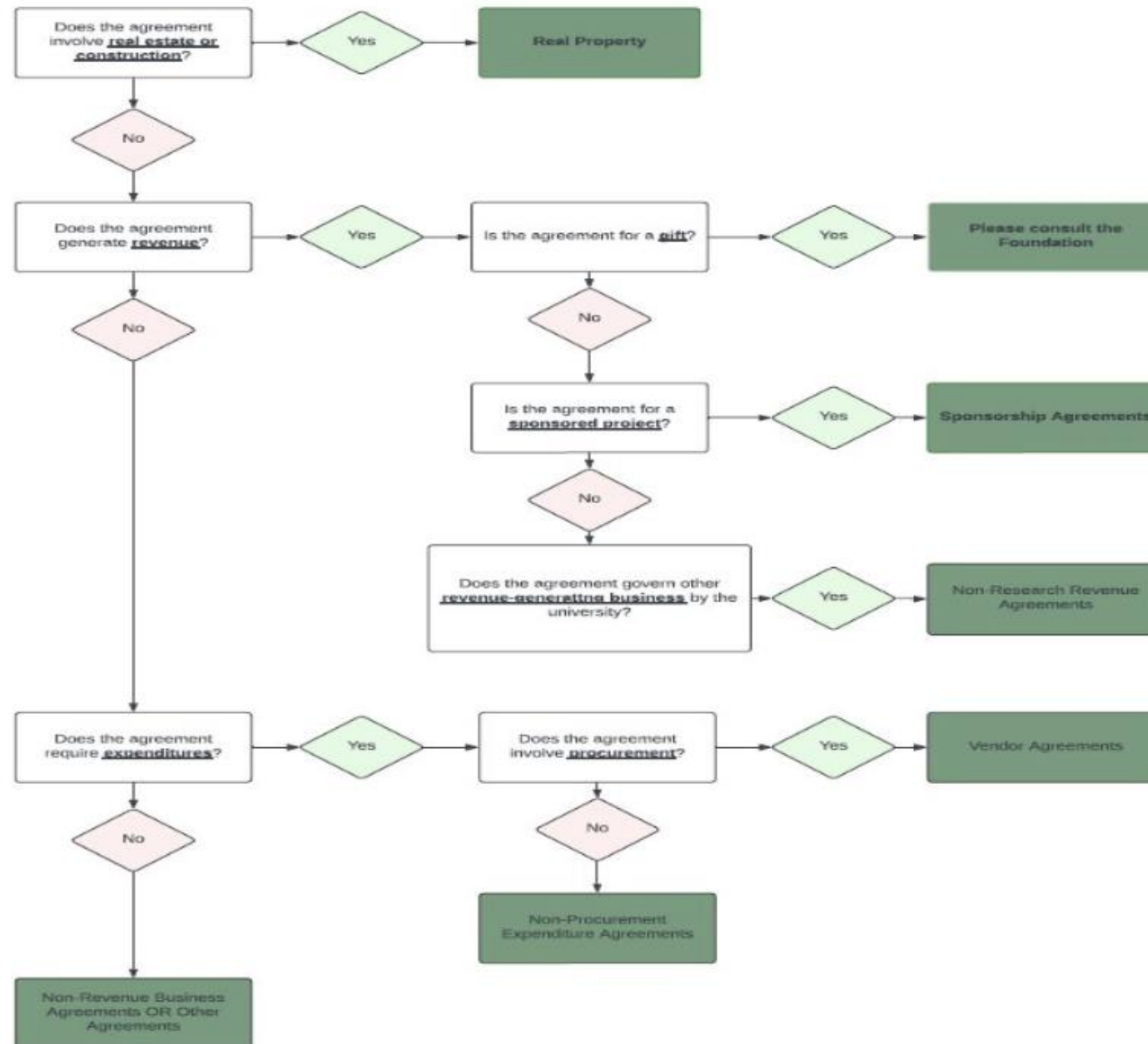
Matrix

How do I know what type of agreement I have?



Campus Controller's Office
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**How do we classify
this agreement?**

Memorandums of Understanding with external parties.

Non-Revenue Business Agreements

Contracts for catering services from a catering company.

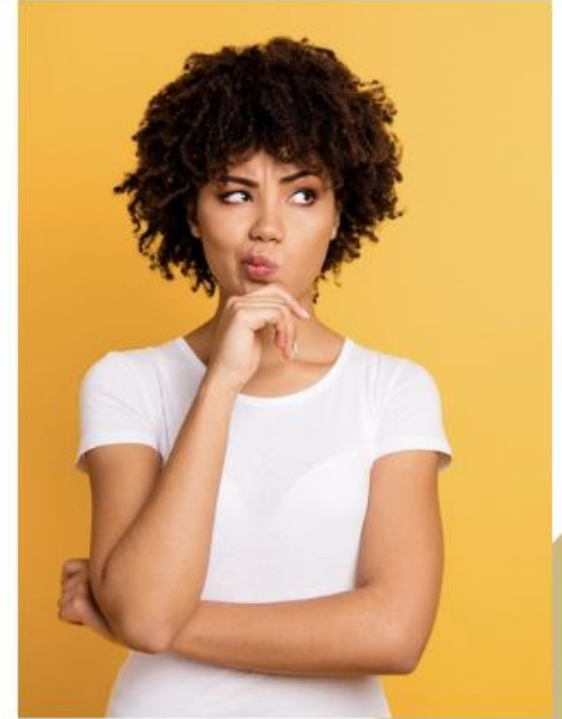
Vendor Agreement

Affiliate agreements with other universities.

Non-Revenue Business Agreements

Contracts extending access to University services, at a cost.

Non-Research Revenue Agreement





Tips

How do I know what type of business review we should perform?

Business Purpose:

For all transactions, a brief explanation of how the purchase benefits the University or project can be included.

If there are conflicts of interest, the conflicts should be declared and mitigated.

Funds for Expenditure:

For any expenditures, a review of pending obligations can be performed to ensure there are sufficient funds to cover the agreement.





Resources

Policy and Matrix

- [Policy](#)
- [Matrix](#)

Article 3 - Officers of the University and Administration of the Laws of the Regents

Regent Policy 13.I - Contracting Authority and Regent Notification

APS 2005 – Signature Authority for Operational Agreements

APS 3002 - Capital Construction Planning and Projects

APS 1013 - Intellectual Property Policy on Discoveries and Patents for Their Protection and Commercialization

University of Colorado Procurement Rules

University of Colorado Fiscal Procedures

APS 2006 - Retention of University Records



The University of Colorado Five-Tier Data Classification Framework

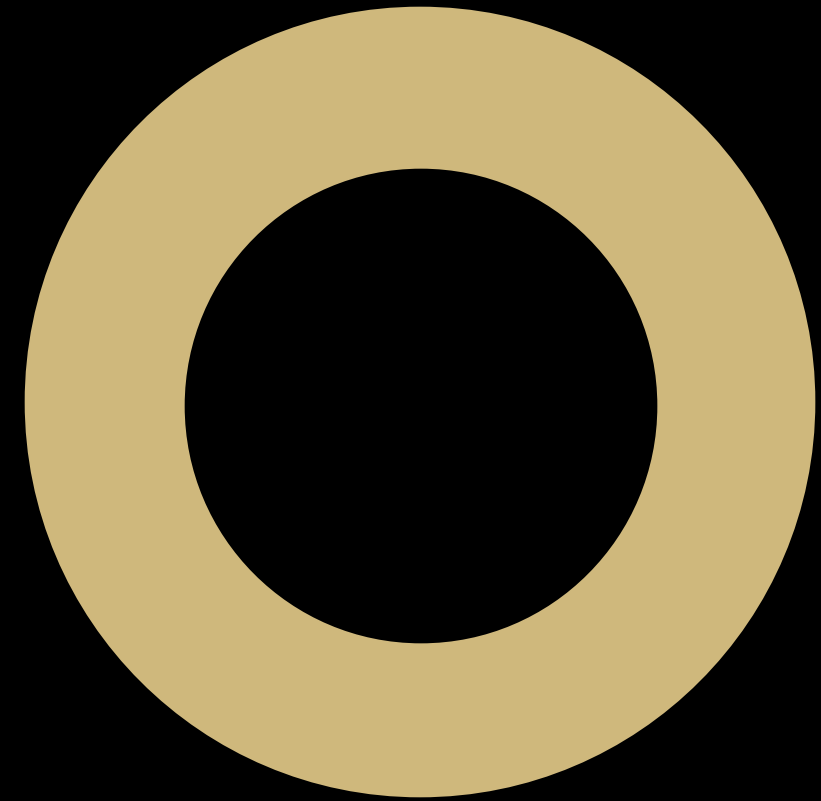
Melisa Jackson

Data Governance Program Manager | OIT

A NEW WAY TO THINK ABOUT UNIVERSITY DATA

The University of Colorado Five-Tier Data Classification Framework

Melisa Jackson • Data Governance Program Manager • CU Boulder Compliance Summit • September 24, 2026



What do I mean by “data”?

And what makes data “institutional”?

DATA

Information we collect, create, receive, use, store, or share.

It can be digital or physical.
Structured or unstructured.
At rest, in transit, or in use.

INSTITUTIONAL DATA

Data created, maintained, or used to conduct CU business - across teaching, research, operations, and administration.

STUDENTS

EMPLOYEES

RESEARCH

OPERATIONS

THE POINT

Classification follows the data and its potential impact - not the job title of the person touching it.

Think “what is this information, and what would happen if it were disclosed?”

Today, the rules depend on who we're talking about.

That creates cognitive load - and creates room for inconsistent decisions.

CURRENT STUDENT DATA

5 levels

- L1 Level 1 Public
- L2 Level 2 Confidential
- L3 Level 3 Confidential
- L4 Level 4 Highly Confidential
- L5 Level 5 Highly Confidential

CURRENT EMPLOYEE DATA

3 levels

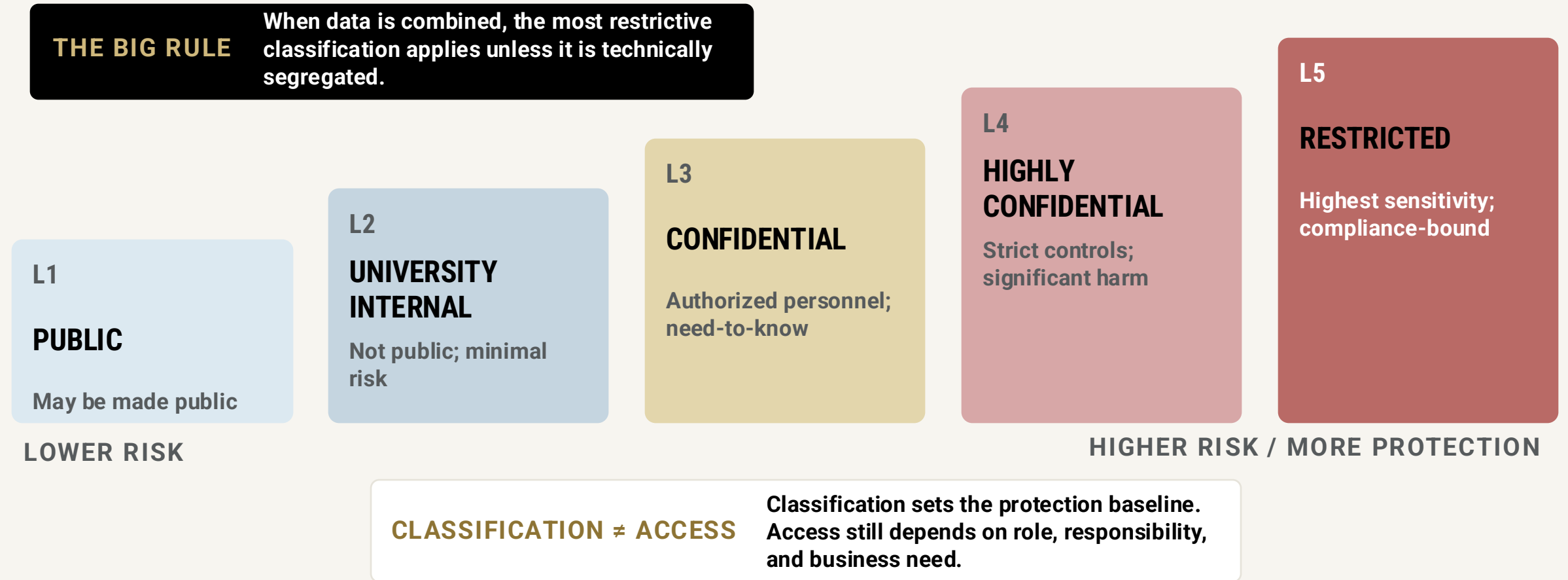
- L1 Public
- L2 Confidential
- L3 Highly Confidential

EXAMPLE "Sex" = Level 2 Confidential for student data, but Highly Confidential for employee data. Given the current frameworks, student employee data poses unique difficulties.

The same data point should not require different models depending on which population record it sits in.

One ladder. Five levels. A common language across CU.

The tiers increase with sensitivity, disclosure impact, and required protection.



A common classification language makes it easier to make the right handling decision - even when the data crosses domains.

You do not need to be a data expert to use this framework.

The framework changes the first question you ask before you move, share, or analyze data.



FOR EVERYONE ON CAMPUS

Your job is not to memorize every data element. Your job is to pause, identify the data, and use the right approved path.

The tool is not the classification. The tool must be approved for the classification.

For AI, check the campus-approved data level before you paste, upload, or connect.

A SIMPLE WAY TO READ THE AI LIST

PUBLIC

Most approved AI tools

CONFIDENTIAL

A smaller set of enterprise tools

**HIGHLY CONFIDENTIAL /
RESTRICTED**

Do not assume an AI tool is approved

RULE OF THUMB

“Enterprise” does not automatically mean “approved for every tier.”

WHAT CU BOULDER CURRENTLY APPROVES

ChatGPT Edu	Public + Confidential
Copilot Chat	Public + Confidential
Microsoft 365 Copilot	Public + Confidential*
Gemini	Public only
Apple Intelligence	Public only

** Microsoft 365 Copilot guidance is tied to data stored/shared inside the M365 platform.*

Consult website for updates and changes: <https://www.colorado.edu/ai/ai-tools-list>

You are an academic advisor with a student spreadsheet.

Can you upload it to ChatGPT Edu?

STUDENT ROSTER - WORKING COPY

Student ID	Name	Cumulative GPA	Disability status	Financial Aid holds
980001	D. Malfoy	3.62	Yes	2 holds
980004	H. Potter	2.91	No	1 holds
980007	G. Weasley	3.84	No	0 holds

THE ANSWER

NOT THE WHOLE FILE.

Disability status and Financial Aid information is Level 4 in the current student data guidance. ChatGPT Edu is currently approved for Public + Confidential data - not Highly Confidential.

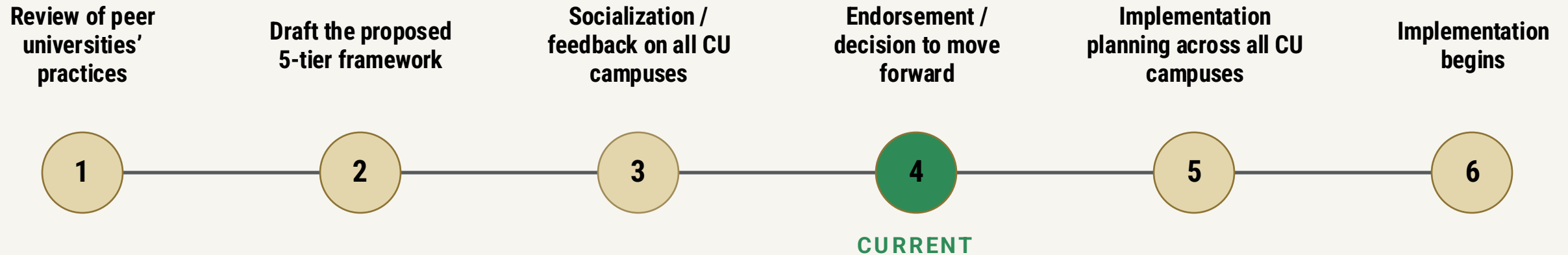
So the “No” is driven by two columns.

INSTEAD

Remove the L4 fields, keep only what you need, confirm the remaining fields are within the approved level, then upload the reduced dataset.

What are the next steps before we will start seeing changes?

The framework is currently being reviewed by University leadership for endorsement and the decision to move forward.



WHAT HAPPENS NEXT Endorsement → Implementation Planning → Implementation Begins

In the meantime, follow existing guidance on the [Data Classification](#) and [AI at CU Boulder](#) websites.

Submit feedback and dive into the details using this QR code.

Final revisions are underway, and feedback at this stage will be helpful in the implementation planning stage.



AFTER TODAY Please reach out to datagov@colorado.edu for follow up questions or comments

Navigating Cybersecurity Compliance in Higher Education and Research

Josh Erenberg

CUI Compliance Program Director | OCEP

Barbara Schnell

Associate Director of Secure Research
Computing | OIT

COMPLIANCE
SUMMIT

Navigating Cybersecurity Compliance in Higher Education and Research

CU Boulder Compliance Summit

Josh Erenberg - Office of Compliance, Ethics and Policy

Barbara Schnell - Office of Information Technology



Office of Compliance,
Ethics and Policy

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Introduction – Who are We?



- Josh Erenberg
- Director, CUI Compliance Program
- Office of Compliance, Ethics, and Policy
- Josh.Erenberg@colorado.edu
- compliance@colorado.edu

- Barbara Schnell
- Associate Director of Secure Research Computing
- Office of Information Technology
- Barbara.Schnell@colorado.edu
- <https://www.colorado.edu/rc/secure-research-computing-resources>

Compliance as a Contract Requirement



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Federal Contract Compliance

- Program chiefly concerns CU as a **Federal Contractor**:
 - **Research**
 - Financial Aid
- Data furnished by federal government to contractors has rules for protection
 - Sometimes differs by agency
 - Sometimes differs by data type





National Institutes
of Health



Entities with Controlled Data Programs



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Federal Contract Compliance

- **Federal Contract Information (FCI)**
- **Controlled Unclassified Information (CUI)**
 - **Covered Defense Information (CDI)**
 - **Federal Taxpayer Information**
 - **Export Controlled Data**
- **Controlled Access Data**



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Protecting Federal Contract Information (FCI)



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FCI – What is it?



- **FAR 52.204-21**
- Federal contract information means:
 - information, not intended for public release, that is provided by or generated for the Government **under a contract** to develop or deliver a product or service to the Government,
 - **but not including** information provided by the Government to the public (such as on public websites) or simple transactional information, such as necessary to process payments.
- Likely not labeled, FCI designation comes from context
- At CU: FCI is seen in research awards, and can cover datasets, deliverables, SOWs, sometimes communications and working information



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FCI – Compliance



- **FAR 52.204-21** mandates adoption of 17 security controls
 - Includes limiting external connections, ensuring physical security and privacy, limiting access and permissions, scanning/antimalware
- In general, when dealing with FCI:
 - Exercise caution and good judgement – treat as “need to know”
 - Refrain from accessing FCI on personal devices
 - Report FCI disclosures to security@colorado.edu



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Protecting Controlled Unclassified Information (CUI)



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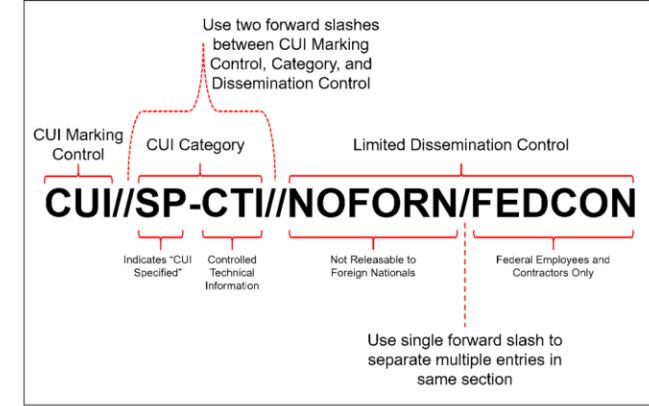
Be Boulder.

CUI – What is it?



- **DoD definition:**
- Controlled Unclassified Information is **unclassified** information the United States Government creates or possesses that requires safeguarding or dissemination controls limiting its distribution to those with a lawful government purpose
- Defined by what it **isn't** (unclassified, not for public disclosure) than what it **is**
- **In practice:** a data/document marking scheme that inherits special handling requirements via contract
- We see this in research and federal student financial aid data

CUI – Compliance



- [DFARS 252.204-7012](#) – requires the implementation of a set of ~100 controls created by National Institute for Standards and Technologies (NIST sp 800-171)
 - Includes controlling access, physical security, identity security, and a whole lot more
 - Documentation!!
- Chief requirement – creation of a **System Security Plan (SSP)** detailing how the operating environment is protected
- CUI docs **should be marked with CUI marking (top right)**
- Some agencies (DoD) have historically required audits
- Report suspected CUI incidents: cui-incident@colorado.edu
 - Very time critical, if you think something is wrong, reach out!

Banner marking with CUI Specified and multiple limited dissemination controls



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Controlled Access Data (NIH)

- **National Institutes of Health** mandates that certain datasets be protected to the same standard as CUI.
- Currently, this program covers data sourced or derived from **20 human-subject databases**
 - Cancer data
 - Genomic data (dbGaP)
 - Health info of minors
 - Alcoholism
- A proposed rule would expand this program to designate **any human subject data** as controlled.



Penalties for Non-Compliance

- **Dept of Justice** pursues noncompliance claims under Cyber Fraud Initiative
- Whistleblower complaints – **False Claims Act**
- Federal Contractors have agreed to large settlements for CUI contract non-compliance:
 - Universities: Georgia Tech and Penn State – around \$1,000,000 each
 - Other private contractors: As high as *\$4 million*





Compliant Solutions

Be Boulder.

OIT Services Supporting Regulated Research

CUI:

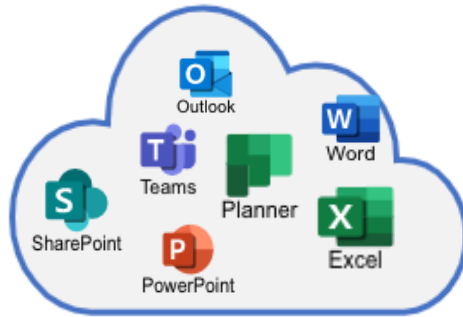
The Preserve is an environment available to researchers who engage in projects that contain CUI data. It is highly controlled to specifically protect research that must meet [Cybersecurity Maturity Model Certification \(CMMC\) 2.0 Level 2, Controlled Unclassified Information \(CUI\)](#) and certain [Export Control](#) regulations.

FCI:

OIT is currently assessing several general-use campus IT services for FCI Compliance. These include:

- Microsoft 365 (commercial)
- InfoEd
- DocuSign
- Alpine

The Preserve and Related Services – **Cloud Only Today**



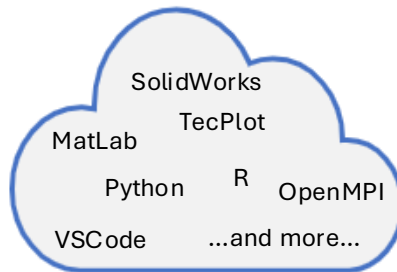
**Secure Messaging &
Collaboration**
O365 for Government



**Secure Cloud Infrastructure,
Networking, Storage, Multi-core
and Cluster Computing
(CycleCloud)**
Azure Cloud for Government



**Identity Management and
Access Control**



**Research Application
Management**



**Security
Controls
Implementation
and Monitoring**



**Secure Cloud Compute
Consulting, Migration &
Operational Support, and Cost
Estimating Support**

The Preserve was built and is maintained to meet federal regulatory requirements for Controlled Unclassified Information that is stored, processed, or transmitted for research administration and research projects. Researchers may use this environment at no cost for baseline services or can build in costs for research contracts for services ***Above and Beyond*** Baseline Services. A Memorandum of Understanding will be put in place for Above and Beyond services once a project is awarded.

Covered by campus:

- Office 365 GCC High licenses: \$360-\$1,000 per user, per year
- File Transfer (Box): \$642 per user, per year
- Shared virtual desktop related infrastructure: \$200-700 per project team per month (Windows virtual desktop; Basic 100GB storage account;; secure networking, monitoring and management services
- Secure landing zone in Azure for Government
- Staffing to maintain compliance.

Recovery for above-and-beyond compute - examples:

- High-performance computing VMs or other machines with storage costing more than \$700 on average per month for 3 months or more.
- Large capacity storage accounts with frequent need to move significant amounts of data in and out.
- Software licenses not covered by campus in general. For a list of software currently vetted by security for use in the Preserve, see .
- Any Microsoft Azure cloud services outside of the scope of basic storage and virtual desktop needs.

Resources:

- Questions about CMMC, CUI, FCI, compliance, or to request training and support: compliance@colorado.edu
- Questions about Preserve access, support: srcs-help@colorado.edu
- Report breaches and incidents
FCI – security@colorado.edu
CUI – cui-incident@colorado.edu
- Office of Export Controls: exportcontrolhelp@colorado.edu

Preserve Resources

- [Overview](#)
- [Preserve Access](#)
- [Costs for Above and Beyond Compute](#)

CUI Resources:

- [Campus CUI Policy](#)
- [CUI Standard](#)
- [RIO CMMC](#)



Office of Compliance,
Ethics and Policy

UNIVERSITY OF COLORADO **BOULDER**

AI Compliance & Upcoming State Laws

Conor Waladay

AI Program Manager | OIT



2026 Compliance Summit

AI & Compliance

Conor Waladay, OIT AI Program Manager



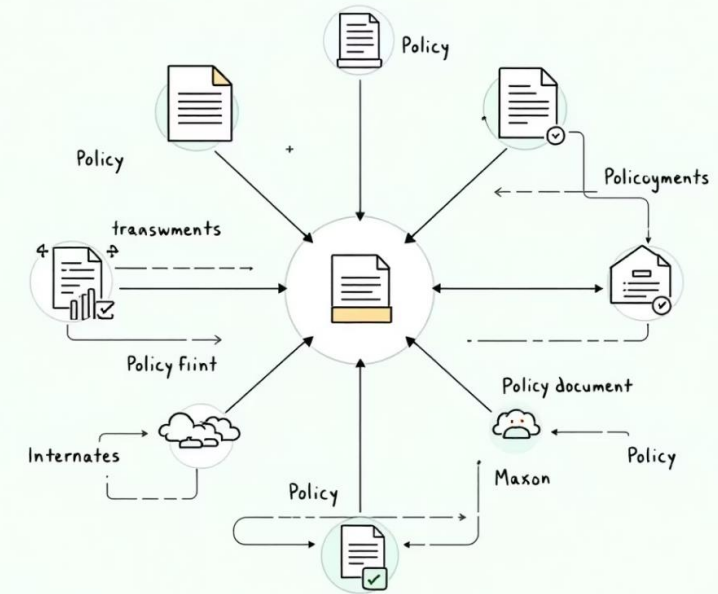
Agenda:

1. What is CU's "AI Policy"?
2. Compliance vs. Policy
3. Upcoming Legislation
4. Why use CU Approved Tools?
5. AI Tools & CU Data
4. AI Tools & CORA
5. Questions & Discussion

CU Boulder's AI Policy

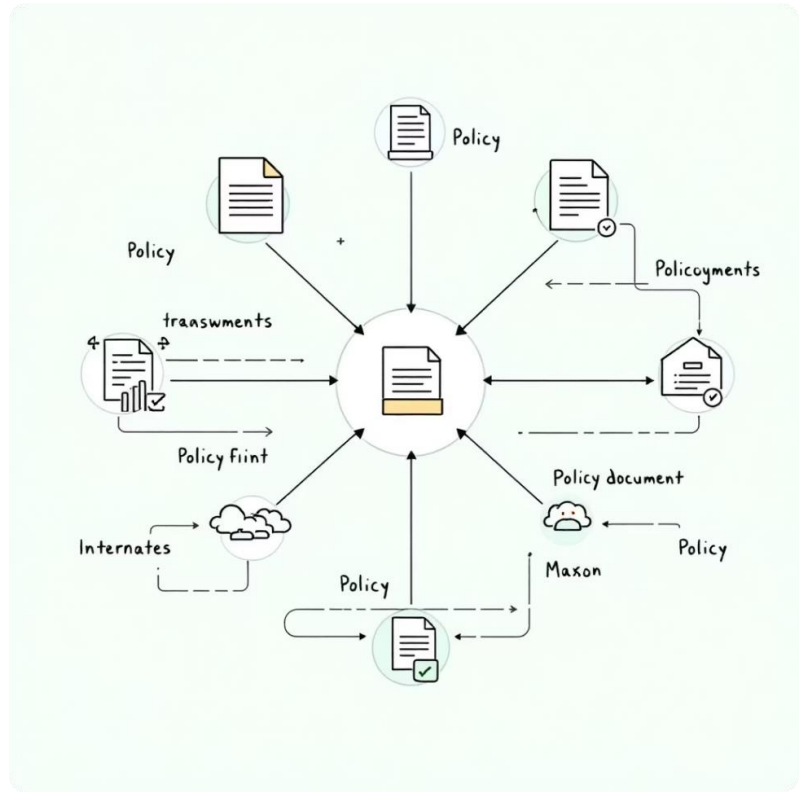
So... *what is* CU Boulder's AI Policy?

- When would I get in trouble for using AI?
- Which AI tools can I use and when?
- How am I allowed to use AI?



CU Boulder's AI Policy

When would I get in trouble for using AI?



What Is *AI Compliance*?

AI compliance at CU Boulder is generally concerned with the governance of AI use, data handling practices, and adherence to institutional standards. It's not just about following laws—it's about responsible stewardship of university resources and data.

Compliance on campus can be broken down on two levels:

External Laws

Federal and state regulations that apply to higher education institutions

Internal Policies

CU Boulder's data standards and governance frameworks

External Laws

Emerging Regulations

The Automated Decision-Making Technology Act (~~SB24-205~~ [SB26-189](#), planned for January 2027) and FTC guidance are beginning to landscape, but specific higher education applications remain currently.

Existing Legal Frameworks

CU Boulder follows established regulations including FERPA (student privacy) and HIPAA (health information protection) protections.

Copyright law precedent will be decided soon with cases currently in the judicial system.

Internal Policies

Institutional Standards

Our [Data Classification Standards](#), [Acceptable Use](#) guidelines, [Data Governance](#) framework, and [code of conduct](#) provide clear direction *regardless* of AI.

Academic Integrity

Faculty have access to example [AI syllabus statements](#) to address academic integrity compliance in their courses.

📌 The regulatory landscape is evolving rapidly. CU Boulder monitors developments and adapts policies accordingly.

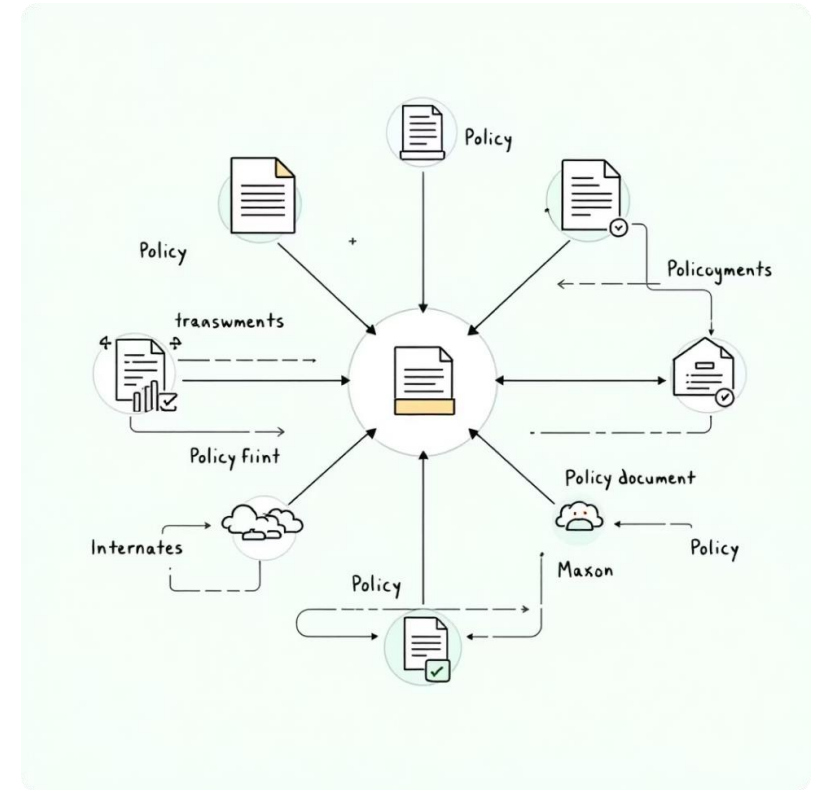
The Automated Decision-Making Technology Act: [State Bill 26-189](#)

Broad Overview:

- Goes into effect January 1, 2027
- Was originally the Colorado AI Act – rescoped to avoid ambiguous terms
- ADMT is technology agnostic, but likely uses AI or Machine Learning
- Does not prevent *use* of ADMT, requires *disclosure* and *appeals* process

CU Boulder's AI Policy

Which AI tools can I use and when?



Why Use CU-Approved AI Tools vs non-approved tools?



Internal Vetting

Every campus AI tool undergoes our ICT Review Process, ensuring enterprise-grade security and accessibility compliance.

Campus-Specific Contracts

Our campus tools are under a specific contract with the CU Regents – terms and conditions are rarely the same as publicly available tools.

Data Protection

Strict data classification policies safeguard sensitive university information, including student records and research data.

Approved AI Tool List

Productivity tools

Tool name	Description	Access	Approved data level
Adobe Creative Cloud	Adobe Firefly is a family of generative AI models to boost creativity and speed up workflows in Adobe products.	Available to faculty, staff and students to purchase.	Public data only.
Apple Intelligence	Apple Intelligence is Apple's AI system that helps users write more effectively, manage information efficiently, and create engaging content.	Available to faculty, staff and students who use Apple devices.	Public data only.
Google Gemini Web App	Google Gemini Web App provides browser access to Google's premier large language model and image generator that can help faculty, staff and students improve their productivity and efficiency.	Available to faculty, staff and students.	Public data only.
Google NotebookLM	NotebookLM is a personalized AI research assistant powered by Google's Gemini. It helps you understand and synthesize information from your uploaded sources, such as PDFs, websites and videos.	Available to faculty, staff and students.	Public data only.
Microsoft Copilot Chat	Microsoft Copilot provides free access to GPT-4 and DALL-E 3 through Copilot Chat and can help faculty, staff and students improve their productivity and efficiency.	Available to faculty, staff and students.	Public & confidential data when logged in with CU account.
Microsoft 365 Copilot	Microsoft 365 Copilot adds Copilot's AI functionality to a suite of Microsoft tools including Word, Excel, PowerPoint, Outlook, Teams, and more.	Available to faculty and staff to purchase.	Public & confidential data within the Microsoft 365 platform*
Microsoft Teams	A unified collaboration platform that integrates chat, video meetings, file sharing, and productivity tools, with AI-powered features like meeting summaries and transcripts.	Available to faculty, staff and students.	Public & confidential data when logged in with CU account.
Wolfram Alpha Pro	Wolfram Alpha Pro is an online computational answer engine that accepts natural language input. AI allows systems to retrieve precise, disambiguated data and perform complex	Available to faculty, staff and students.	Public data only.

Can I Only Use Tools from the AI Tools List?

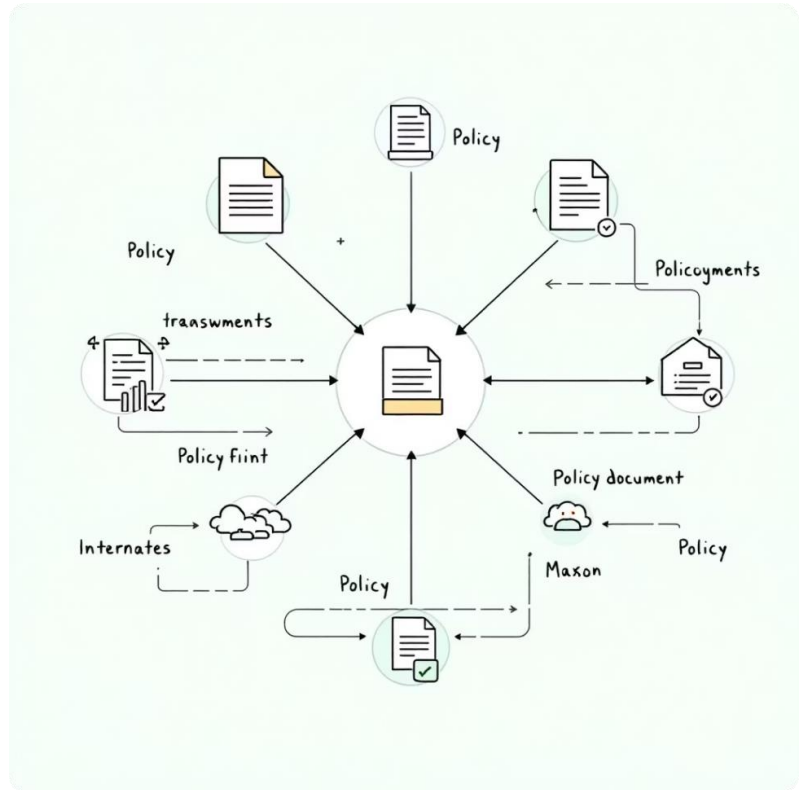
No! While CU Boulder's [AI Tools List](#) provides a list of widely approved AI tools for broad campus use, other AI tools can be evaluated and evaluated and approved for specific use cases through our established review process. The ICT Review process can grant conditional approval conditional approval for requests based on:

1. Data Use	2. Scale & Scope	3. Accessibility
Conditional Approval & Guidance		
You can receive a conditional approval for use and guidance on appropriate usage parameters.		

Access AI Tool Evaluation Request Form

CU Boulder's AI Policy

How am I allowed to use AI?



AI Tools & CORA

**I am not a lawyer*

Administrative Overview

Individual chats are not viewed unless a legal **Open Records Act request** is made, in which case IT security collaborates with legal counsel to comply.

Personal Accounts & Devices

Using a **personal account or device does not exempt** you from CORA from CORA and could increase personal liability. For the time being, being, *treat AI chats as electronic communication*, the same you would you would email.

Data Retention

CORA does not dictate data retention policies. Most platforms require a minimum of 30 days data retention once a user deletes individual data. A formal CORA request does stop deletion from the day received.

CORA Requests Come Through CU

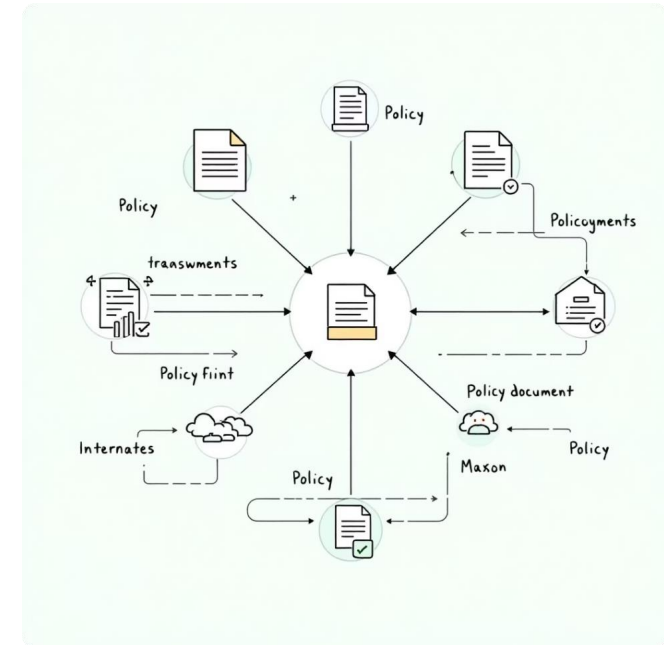
An individual executing a CORA request works through CU Legal Legal Council, not a vendor or the government. It is possible, but highly but highly unlikely, that similar records could be subpoenaed from a from a vendor.

AI Tools & Highly Confidential Data

Which enterprise AI tool should I use with Highly Confidential Data?

Currently, no AI tool is broadly approved for use with HC data.

- *There are ways to securely run LLMs locally or through a commercial vendor outside of our broad use tools.*
- *CU Denver/Anschutz has approved Copilot for HC data, but this requires a more restricted general access.*
- *Consult IT security for more context-specific considerations*



What about “Agentic” AI?

- “Agentic” is a spectrum – foundationally it is AI’s ability to act on its own
- Agentic AI unlocked incredible new capability *and risk*
- What used to be reserved to expensive tools/subscriptions; not anymore
- Agents want to solve problems & will look through available data to do it
- Who is liable for actions of agentic AI?

Understanding "non-university data" uses

One of the most common questions about AI use involves "non-university" data. While you can use unapproved tools when using non-university protected data, there are still risks that exist. When in doubt, consult OIT before proceeding.



Risks of using unapproved tools:

- Vendors may train model on your own personal data (Ex: ChatGPT, Claude, etc)
- End User License Agreements cannot be agreed to for work use (Ex: some EULA's limited to personal use)
- Security risks related to vulnerable systems (Ex: Deepseek)
- Granting wider access to your data than expected (Ex: Read.AI accessing meeting transcripts)
- Accidental data leak of protected data (Ex: AI web browsers or browser extensions)

What can we use AI tools for?



Outreach & Communications

Newsletters, social media, website copy, etc. Ground your your preferred AI tool in effective examples to match tone and tone and approach. Ask Copilot to reference your previous previous emails.



Deidentified Work

Deidentifying materials opens up more uses but requires requires vigilance and caution.



Training & Support

Use AI tools to help design training activities and exercises, exercises, provide feedback on clarity, create detailed case case studies, etc.



Report Generation

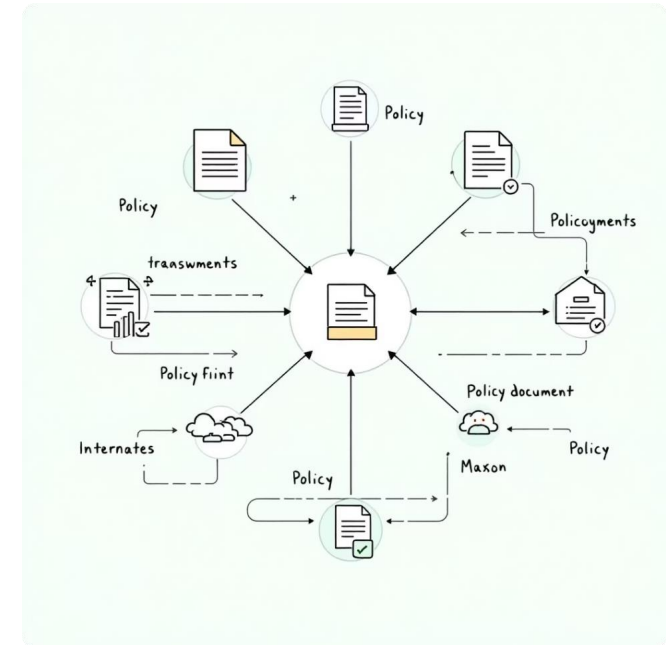
Do you have repetitious reporting requirements? Consider Consider building an agent to help form a report based on on previous examples and add in identifying characteristics after characteristics after exporting.

CU Boulder's Policy

But what is CU Boulder's *AI Policy*?

It is impossible to adopt a singular AI policy because of the diverse ways that AI intersects with teaching, research, & administration and each area's unique needs and risks...

Instead we are focused on our existing data policies as well as increasing AI literacy and access to safe AI tools.



Where can you learn more?

CU Boulder is taking a proactive, educational approach to AI integration. Our efforts focus on building community knowledge and ensuring access to secure tools.

AI Literacy Initiatives

1

"AI Literacy Foundations"

CU Boulder's [self-paced Canvas course](#) is available to all faculty, staff, and students

2

AI Communities of Practice

Faculty and staff are encouraged to be a part of the conversation on conversation on campus via the [AI Community of Practice](#) and the [Teaching and Learning & AI CoP](#)

3

Faculty & Staff Workshops

Hands-on sessions covering AI use in administrative, teaching, and teaching, and research contexts. Example: Google Gemini & Microsoft Microsoft Copilot trainings coming up!

AI Tool Guidance

1

AI Tools List

[A centralized repository](#) of vetted and approved tools offered to the offered to the campus to access AI capabilities. Includes details on details on access and specific guidance on approved data usage. usage.

2

"AI @ CU" Homepage

[A hub](#) for resources and guidance on AI use on campus including including current efforts and events.

3

ChatGPT Edu Resources

We have a number of webpages published for our campus campus workspace: [Project Page](#), [FAQ Page](#), [AI Tools Comparison Comparison Page](#)



Questions & Discussion

We value your insights and concerns! Please share any questions you have regarding CU Boulder's AI policies, approved tools, or upcoming legislation.

Contact Conor at conor.waladay@colorado.edu

Lunch

12:15 – 1:15 pm



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learn more and register for upcoming events by visiting colorado.edu/compliance/events-and-training

Youth Protection Situation Tables

Lee Potter

Youth Protection Compliance Manager | Office of Compliance, Ethics and Policy



Office of Compliance,
Ethics and Policy

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Youth Protection

Youth Protection Situation Tables

Cross-functional and incident response tabletop exercise.

Tabletop Discussion Framework

Work through your assigned scenario together as a cross-campus team (15 Minutes)

01 / IMMEDIATE

Action & Triage

Next steps and immediate resources needed.

02 / PROGRAM

Control Analysis

Where controls failed and fixes for tomorrow.

03 / SYSTEMIC

Institutional Impact

Broader institutional areas of growth.

04 / NETWORK

Departmental Links

Information gaps and collaborating offices.

Scenario 1: High School Program Conflict

Evaluating partnership liability, physical altercations, and behavioral threats

The Setting

A campus summer program operates in coordination with a local high school. The school buses students daily and provides chaperones, but today no school representative is present.

The Incident

Ava strikes Jordan after an unauthorized photo is taken. During staff intervention, Jordan makes a shooting motion toward others and an explicit verbal bias statement.

Scenario 2: Weekend Check-Out Incident

Navigating minor safety, substance use, and authorized adult transport

The Setting

A two-week residential program allows high school participants to be temporarily checked out by authorized adults on weekend afternoons.

The Incident

A participant returns past curfew clearly intoxicated after being dropped off by an aunt who staff strongly suspect was driving under the influence.

Scenario 3: Dining Hall Privacy Concern

Managing employees and privacy allegations

The Setting

Participants and staff utilize the main campus dining facility for daily meals during a multi-week youth program.

The Incident

A coach witnesses a dining employee taking photos of female participants in the serving line. The employee denies it and refuses to show his phone.

Scenario 4: Prescription Medication & Illness

Balancing emergency medical response with minor confidentiality

The Setting

Overnight residential program with chaperones housed alongside high school participants in campus dorms.

The Incident

A 14-year-old participant is throwing up after taking a roommate's prescription medication to get high. She begs the chaperone not to notify her parents.

Scenario 5: The "Beloved Insider" Boundaries

Addressing boundary-crossing behaviors among tenured institutional insiders

The Setting

Arthur, a popular retired professor, volunteers with a multi-week overnight program and is beloved by staff and participants alike.

The Incident

Arthur isolates a withdrawn participant, contacts parents outside supervision channels, hugs all children, and gives selective gifts.

Scenario 6: Virtual Program Domestic Concern

Recognizing and reporting distress signals during remote engagement

The Setting

Virtual youth program for participants ages 8–12 interacting via video conference from their homes.

The Incident

A staff member overhears loud family arguments in the background and a parent shouting a violent threat ("I will F*ing beat you") to an older sibling.

Scenario 7: Off-Campus Campground Intruder

Supervision gaps and institutional policy reach for off-site programs

The Setting

A college-sponsored overnight program is held off-campus at a commercial campground, falling under institutional youth policy.

The Incident

An inebriated adult intruder enters the campground shower area and physically and verbally assaults participants while no adult staff are present.

Building a Culture of Youth Protection Together

Understanding Accreditation: Why It Matters, Why It Matters Now, and What Comes Next

Erika Swain

Assistant Director of Academic Compliance and Authorization | Academic Affairs

A background image showing a group of business professionals in an office setting. A man in a suit and tie is on the left, gesturing with his hands. A woman in a grey blazer is in the center, holding a smartphone. Another person is on the right, holding a white coffee cup. In the foreground, a tablet displays a document with charts and text. The overall scene is a professional meeting or collaboration.

Understanding Accreditation

**Why it Matters, Why it
Matters Now, and What
Comes Next**

Understanding Accreditation

Erika Swain

Assistant Director of Academic
Compliance and Authorization

erika.swain@colorado.edu

- What is accreditation?
- What does accreditation actually look at?
- Why does accreditation matter?
- Why now?
- Wait, what is going on in DC?
- The road ahead to 2029-2030



So... what is
accreditation?

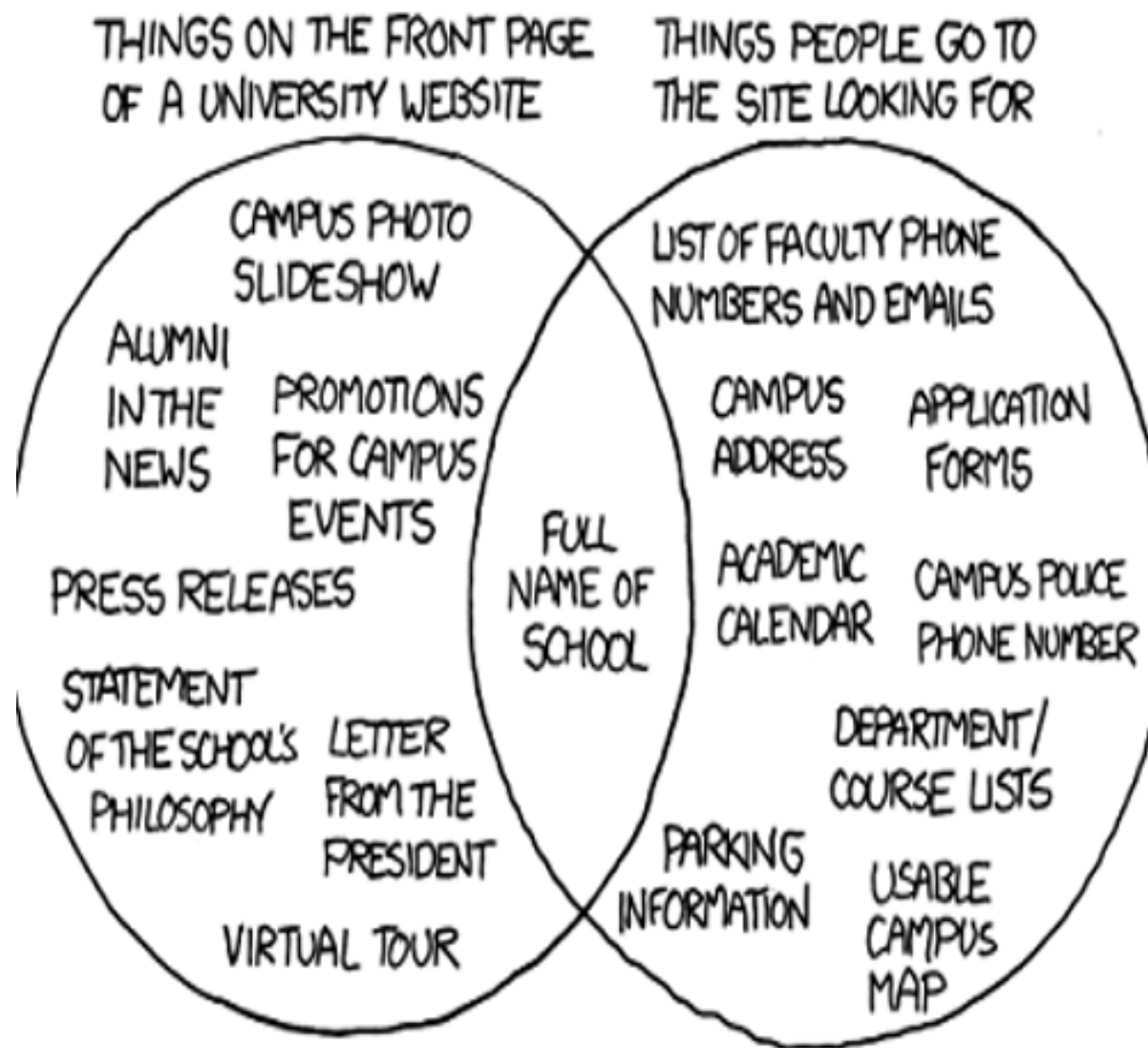


What is accreditation?

- A formal, independent evaluation process that verifies an organization, program, or institution meets defined quality and performance standards
- Conducted by a recognized accrediting body (governmental, professional, or third-party)
- Confirms that operations, curricula, services, or products meet established industry, educational, or regulatory benchmarks
- Voluntary in many sectors, but often required for funding, licensure, or professional recognition
- Involves self-assessment, external review/site visits, and periodic renewal
- Signals credibility, trust, and accountability to stakeholders (students, patients, customers, regulators)
- Common in fields like higher education, healthcare, laboratories, and nonprofit organizations

What Does Accreditation *Actually* Look At?

- Mission and integrity
- Teaching and learning
- Student support
- Governance and resources
- Assessment and institutional effectiveness
- Continuous improvement



Why does accreditation matter?

- **Quality and public confidence**

Accreditation gives students and the public an independent assessment of institutional quality.

- **Recognition and opportunity**

Accreditation affects federal student-aid eligibility, transfer decisions, employer confidence, and some professional-licensure pathways.

- **Institutional improvement**

The process requires CU Boulder to evaluate whether its systems support its mission and whether evidence leads to improvement.

Why now?

- Accreditation is under federal scrutiny
 - An April 2025 executive order called for major changes to accreditation.
 - The Department of Education has proposed revisions to federal recognition requirements.
 - The debate concerns outcomes, transfer, academic freedom and intellectual diversity, institutional compliance, and competition among accreditors.

What happens in DC doesn't stay in DC...



STUDENT OUTCOMES



TRANSFER OF CREDIT



INSTITUTIONAL POLICIES
AND PRACTICES

**WE ARE ALL
ON THE
SAME TEAM
AIMING AT THE
SAME TARGET.**

Any competition or conflict between teams and individuals is a clear indication that the wrong targets are being sighted. Step back and reconsider your aim.

MEMO RANDOM

77

The road ahead

- understand the revised HLC expectations under which we'll be reviewed;
- look honestly at where our evidence is strong and where we have gaps;
- engage people from across campus in the review;
- document improvement rather than trying to reconstruct it three years later; and
- ultimately prepare the institutional report and comprehensive evaluation.

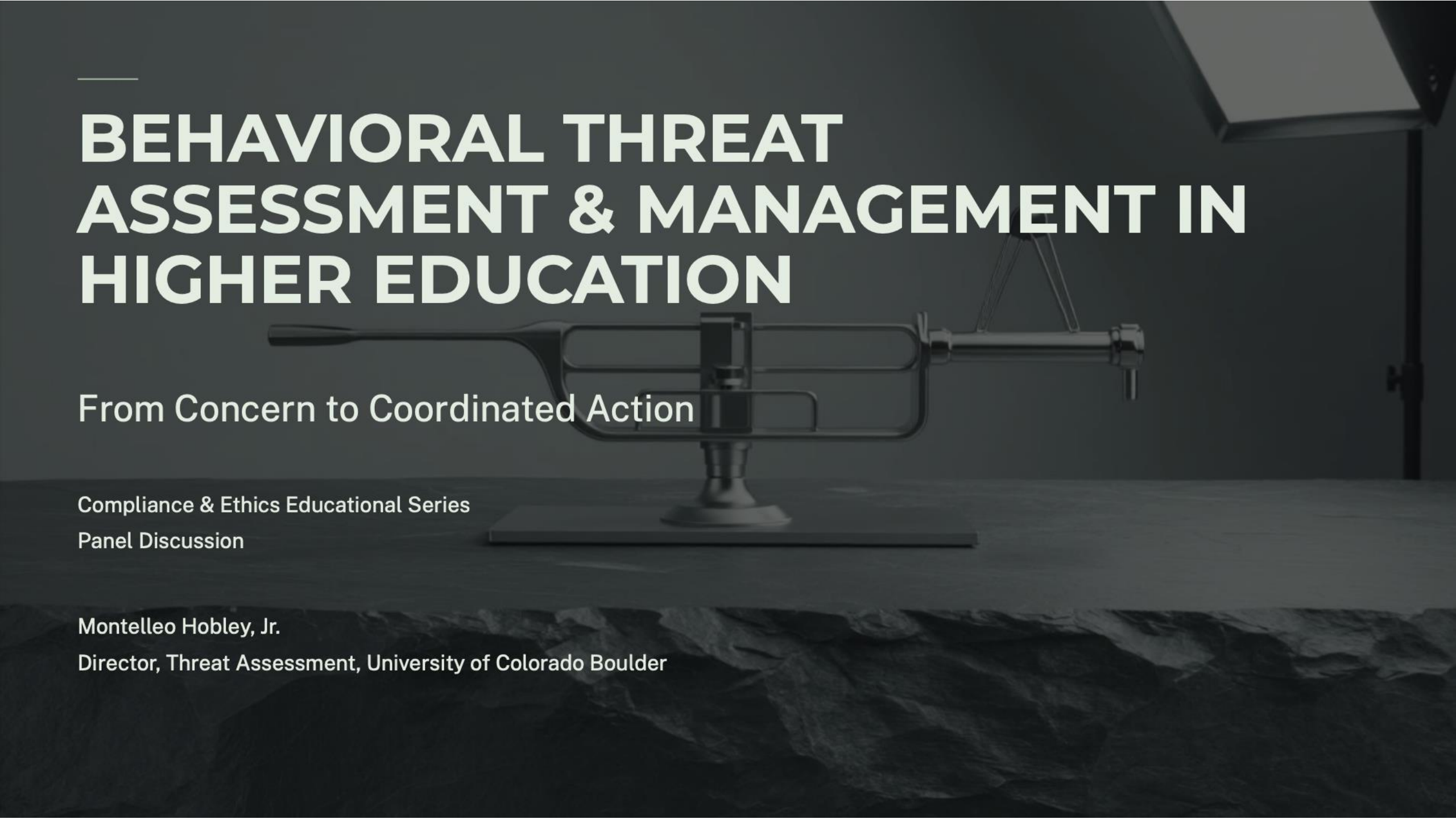


Questions?

Behavioral Threat Assessment and Management

Panel Discussion

BEHAVIORAL THREAT ASSESSMENT & MANAGEMENT IN HIGHER EDUCATION



From Concern to Coordinated Action

Compliance & Ethics Educational Series
Panel Discussion

Montelleo Hobley, Jr.
Director, Threat Assessment, University of Colorado Boulder

Framing Our Conversation

BTAM is an institutional responsibility.

Behavioral Threat Assessment and Management is not the responsibility of any single office, profession, or discipline.

- 01 The right **people**
- 02 The right **information**
- 03 The right **expertise**
- 04 The right **resources**
- 05 At the right **time**

Key framing question: How do we move from individual pieces of information to coordinated institutional action?



UNIFIED ACTION

Meet Our Panelists

PERSPECTIVES ACROSS THE BTAM ECOSYSTEM

Devin Cramer

Associate Vice Chancellor & Dean of Students, CU Boulder

Jan Pierce

Associate Director, Support and Safety Assessment, CSU

Courtney Tassin

Associate Vice Chancellor & Chief of Campus Safety, DU

Stanley Ly

Director, Faculty and Staff Assistance Program, CU Boulder

Facilitator: Montelleo Hobley, Jr.

Thank you!



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Prize Giveaway

3 participants will win a prize from a
randomized drawing



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