**University Affairs – Academic Contract Administration & Compliance Operations**

<https://www.wcupa.edu/universityAffairs/academic-contract-compliance.aspx>

**Home/landing page updates:**

**Create tabs at the top of the page for each of the following topics:**

* Home *(landing page)*
* Agreements
* Compliance Requirements/CastleBranch
* Legal Actions
* Right to Know (RTK)
* FAQs

Keep the Office Contact box on the right side

* **Add** Stephanie Kienle – Director of Faculty Affairs & Quality Improvement
* **Relocate** the “Compliance Request for Student Placements” button link to the top of the Compliance Requirements/CastleBranch tab.
* **Remove** “coming soon – CastleBranch

**Welcome to Academic Contract Administration & Compliance Operations.**

The mission of Academic Contract Administration & Compliance Operations is to facilitate all aspects of non-procurement academic contracting, compliance, and legal administration. The office serves as the liaison to affiliated entities, many campus offices, the WCU community, and the Pennsylvania State System of Higher Education university legal counsel, holistically strengthening WCU's collaborative contractual relationships.

The office coordinates with the Pennsylvania State System of Higher Education university legal counsel to provide a campus response to subpoenas and other legal issues in higher education. The office serves as the academic contracting officer for all academic programs, which includes more than 200 academic programs, more than 17,000 students, and more than 2,500 active contracts.

AGREEMENTS PAGE

Types of agreements and explanation what they are for/cover….

**+ Articulation**

*Content coming*

**+ Affiliation**

*Content coming*

**+ Concurrent**

*Content coming*

**+ Dual Enrollment**

*Content coming*

Links:

* [Academic Agreement Flowsheet](https://www.wcupa.edu/universityAffairs/documents/academic-agreements-flowchart-23.pdf)
* [Academic Agreements SharePoint Site](https://wcupa.sharepoint.com/sites/AA/provo/ac/SitePages/Home.aspx)

FAQs about agreements (pull from overall FAQ list??)

COMPLIANCE REQUIREMENTS/CASTLEBRANCH

WCU compliance office serves as the academic contracting office for all academic programs, which includes more than 200 academic programs and more than 2,500 active contracts.

Students in an academic credit internship/clinical experience must comply with requirements set by their academic program and the terms of the affiliation agreement between WCU and the placement site before starting any clinical/field/internship experience

Compliance requirements vary and are based on the academic program and a student’s placement site(s).

**Commonwealth of Pennsylvania Information about Clearances:** <https://www.education.pa.gov/Educators/Clearances/FAQ/Pages/Portability.aspx>

***PA Criminal background clearance (PATCH)*** [*https://www.pa.gov/services/psp/request-a-criminal-history-background-check.html*](https://www.pa.gov/services/psp/request-a-criminal-history-background-check.html)

***PA child abuse clearance*** [*https://www.pa.gov/agencies/dhs/resources/keep-kids-safe/child-abuse-clearances/pa-child-abuse-history-clearance.html*](https://www.pa.gov/agencies/dhs/resources/keep-kids-safe/child-abuse-clearances/pa-child-abuse-history-clearance.html)

**CastleBranch Portal**

portal.castlebranch.com/ws48

WCU works with third party provider, CastleBranch to approve student compliance requirements. **Cost of all compliance requirements are the responsibility of the student.**

**+ Overview of Student Compliance Packages: (accordion dropdown)**

**Add on** **packages\*** include additional requirements to comply with the terms of a **non-standard affiliation agreement**.

*This may include vaccination/immunizations, drug test, and/or fingerprints.*

**\****Depends on a student’s placement site and terms required per the affiliation agreement.*

A **Standard** **program** **package** includes the minimum requirements to meet the needs of the academic program and comply with the terms of a **standard affiliation agreement.**

**Minimum Requirements:**

* PA Criminal Background Clearance
* PA Child Abuse
* Professional Liability Insurance Policy
* WCU Student Attestation

Placement at a site with a **standard affiliation agreement**:

Student would purchase and complete a **Standard Program Package**

Placement at a site with a **non-standard affiliation agreement**:

Student would purchase and complete a **Standard Program Package** **+ Add-on package(s)** as needed per agreement terms

**+ Click on your college below to review the standard package specific to your program: (accordion dropdown)**

+ **College of Health Sciences Packages (sub accordion dropdowns)**

|  |  |
| --- | --- |
| **Program** | **CastleBranch Package Code** |
| Athletic Training | WZ47 |
| Communication Sciences & Disorders | VS30 |
| Kinesiology | WZ95 |
| Nutrition – Dietetics | WZ67 |
| Public Health Sciences – Graduate | WZ42 |
| Public Health Sciences – Undergrad | WZ41 |

*\*****Nursing/Physician Associate/Respiratory Care*** – these programs complete compliance requirements through American DataBank. Please review requirements with program coordinators

**+ Wells School of Music Packages (sub accordion dropdowns)**

|  |  |
| --- | --- |
| **Program** | **CastleBranch Package Code** |
| Music Therapy | WX71 |

**+ College of the Sciences and Mathematics Packages (sub accordion dropdowns)**

|  |  |
| --- | --- |
| **Program** | **CastleBranch Package Code** |
| Psychology (both Graduate and Undergraduate) | WZ66 |

**+ College of Education and Social Work Packages (sub accordion dropdowns)**

|  |  |
| --- | --- |
| **Program** | **CastleBranch Package Code** |
| Counselor Education |  |
| Social Work – Graduate |  |
| Social Work - Undergraduate |  |

+ **College of Business and Public Management (sub accordion dropdowns)**

|  |  |
| --- | --- |
| **Program** | **CastleBranch Package Code** |
| Criminal Justice | VV19 |

**+ Student resources:**

* Understanding compliance packages
* Click on your college to view your academic program code for CastleBranch
* Link to CastleBranch Portal (portal.castlebranch.com/ws48)

**+ Faculty resources:**

* Link to CastleBranch Portal (portal.castlebranch.com/ws48)
* Overview of Compliance Request Process (PDF or display in dropdown?)
* REDCap link to submit a student compliance request (or can submit a full list directly to the compliance office)

**+ Compliance Related FAQs**

* **Commonwealth of Pennsylvania Information about Clearances:** <https://www.education.pa.gov/Educators/Clearances/FAQ/Pages/Portability.aspx>
* **Information about Child Abuse Clearance:**

[**https://www.pa.gov/en/agencies/dhs/resources/keep-kids-safe/child-abuse-clearances.html**](https://www.pa.gov/en/agencies/dhs/resources/keep-kids-safe/child-abuse-clearances.html)

* **PA State Police Criminal History**
* **FBI Criminal Background Check (Fingerprints)**
* **How long are clearances valid?**
* Clearances are required for an employee or unpaid volunteer at a minimum of every 60 months from the date of the oldest clearance. Clearances may be required more frequently based on licensure or employer requirements.
* Agencies and organizations must ensure that clearances are obtained in accordance with the CPSL
* **Can a child abuse history certification or PA state police criminal history certification obtained for volunteer activities be used for employment purposes?**
	+ No. Child abuse history certifications and PSP criminal history certifications obtained for volunteer purposes can only be used for other volunteer activities. Child abuse history certifications obtained for volunteer purposes will indicate that the certification is to be used for volunteer purposes only.
* **What if I have multiple different placement sites:**
* If a student is rotating between multiple sites within an AY, all site affiliation agreements will be reviewed to ensure compliance with all placements.
* Programs with multiple year rotations, year 1 will purchase a new student package, year 2 will purchase a renewal package.
* **How do I contact CastleBranch?**
	+ [To Contact CastleBranch Customer Service](https://student-faq.cbbridges.com/how-do-i-contact-support/)
* **How do I know what compliance package I need for my placement?**
	+ Every program has a standard package with a code specific for their program (reference list of program codes)
	+ During the compliance request process (initiated by program coordinators) students are notified by the compliance office the standard program package code and whether any add-on packages are required per the terms of the affiliation agreement with the site.
* **What is the WCU Student Attestation form?**
	+ Students are required to sign an attestation form that states they have read the affiliation agreement between WCU and their placement site, and by signing agree to comply with the requirements of their academic program and placement site(s).
	+ Link WCU Student Attestation form here(PDF) (or no because it is different between colleges?)
* **Getting errors when uploading documents to CastleBranch? What you can do:**
	+ Make sure the file is less than 5MB in total
	+ Reduce the size or compress if possible
	+ If still not working, please contact CastleBranch Customer Support
* **Compliance Requirements for Paid Experiences:**

Students with paid experiences that are employees of the site do not need an agreement. There are two key components for determining that a student is an employee that does not need an agreement:

1. the student must be completing their field experience as part of their normal work responsibilities.
2. the student must be paid a living wage (minimum wage or more) and not a nominal stipend.

If both of these circumstances are met the student’s relationship with the site is solely between the employer and employee. If both circumstances are not met, there will need to be an agreement, and the student is required to meet all of the requirements of the agreement.

Legal Actions

*Content coming…*

Right to Know (RTK) - **Mike**

* + [Right to Know Portal](https://redcap.wcupa.edu/redcap/surveys/?s=HJ3TDMXRCER3K4N7)
	+ [Right to Know Depository](file:///%5C%5Cwcufiles%5Cifs%5CDept%5CAdminFinance%5CRTK2020andNewer) (For Authorized Individuals)
	+ Right to Know SOP’s (link to document coming soon)
* Expectations
	+ A Right to Know request must be answered within five (5) business days from receipt.
		- If a RTK request is received on a weekend or holiday where WCU is closed for business, the next business day would be the “receipt date”.
		- If you and your contacts within WCU are unable to retrieve/give you the information you are requesting within the five (5) business days, you may request a “extension” for the following reasons:

Section 902. Extension of Time (Link)

* + - 1. Determination. Upon receipt of a written request for access, the open-records officer for an agency shall determine if one of the following applies:
				* The request for access requires redaction of a record in accordance with section 706;
				* The request for access requires the retrieval of a record stored in a remote location;
				* A timely response to the request for access cannot be accomplished due to bona fide and specified staffing limitations;
				* A legal review is necessary to determine whether the record is a record subject to access under this act;
				* The requestor has not complied with the agency’s policies regarding access to records;
				* The requester refuses to pay applicable fees authorized by this act; or
				* The extent of nature of the request precludes a response within the required time period.
			2. Notice:
				* Upon determination that one of the factors listed in subsection (a) applies, the open-records officer shall send written notice to the requester within five (5) business days of the receipt of the request for access under subsection (a).
				* The notice shall include a statement notifying the requester that the request for access is being reviewed, the reason for the review, a reasonable date that a response is expected to be provided and an estimate of applicable fees owed when the record becomes available. If the date that a response is expected to be provided is in excess of 30 days, following the five business days allowed for in section 901, the request for access shall be deemed denied unless the requester has agreed in writing to an extension to the date specified in the notice.
				* If the requester agrees to the extension, the request shall be deemed denied on the day following the date specified in the notice if the agency has not provided a response by that date.
			3. Section 903. Denial:

If an agency’s response is a denial of a written request for access, whether in whole or in part, the denial shall be issued in writing and shall include:

A description of the record requested.

The specific reasons for the denial, including a citation of supporting legal authority.

The typed or printed name, title, business address, business phone number and signature of the open-records officer on whose authority the denial is issued.

Date of the response.

The procedure to appeal the denial of access under this act.

Why is WCU expected to cooperate with RTKL?

* + Upon receipt of a written request for access to a record, an agency shall make a good faith effort to determine if the record requested is a public record, legislative record or financial record and whether the agency has possession, custody or control of the identified record, and to respond as promptly as possible under the circumstances existing at the time of the request. The time for response shall not exceed five business days from the date the written request is received by the open-records officer for an agency. If the agency fails to send the response within five business days of receipt of the written request for access, the written request for access shall be deemed denied.

FAQs

* What is a contract or agreement?
* Contracts and agreements are different names for the same legally binding document. They are interchangeable. Contracts and agreements contain legal promises between two or more parties. These legal promises are enforceable in a court of law. Academic contracts and agreements must be reviewed by Academic Contract Administration & Compliance Operations.
* Should I sign this?
	+ The WCU President is the only WCU authority that can delegate signatory authority. The Delegation of Presidential Authority designates who can sign and what type of contract they can sign. The Delegation of Presidential Authority document resides with the Vice President for Finance and Administration Office.
	+ Have you been designated by the WCU President to have signatory authority?
		- If **yes**, you may sign the document or request legal review from Academic Contract Administration & Compliance Operations, as needed.
		- If **no**, forward the document to Academic Contract Administration & Compliance Operations, for review.
	+ Does the document require WCU, a department of WCU, or an employee of WCU to do something?
		- If **yes**, forward the document to Academic Contract Administration & Compliance Operations, for review.
		- If **no**, consider that your signature is typically requested in order to document your promise (bind you or WCU) to something. Forward the document to Academic Contract Administration & Compliance Operations, for review.
	+ What is an affiliation agreement?
		- An affiliation agreement allows WCU and an outside entity to collaborate for a purpose. These agreements contain legal promises that each party is legally required to fulfill. These agreements are enforceable by a court of law. Affiliation agreements must be reviewed by Academic Contract Administration & Compliance Operations.
	+ What is a dual enrollment or concurrent agreement?
		- Dual enrollment and concurrent enrollment are the same. A dual enrollment or concurrent enrollment agreement allows students at a Pennsylvania high school to take WCU courses, at a discounted rate, as provided by Public School Code. These agreements are enforceable by a court of law.
		- The initial point of contact for these agreements is John Ulrich, PhD. (julrich@wcupa.edu).
	+ What is an articulation agreement?
		- For non-WCU students, an articulation agreement allows students at an outside university or college to take courses at the outside university or college and transfer those credits toward a WCU academic program.
		- For WCU students, an articulation agreement allows students to take courses at WCU and final year courses at the outside university or college. Completion of required courses at the outside university or college in combination with completion of courses at WCU will convey two degrees upon the student; one from the outside university or college and one from WCU. Typically, these agreements allow WCU students to accelerate their bachelor and graduate degrees by conveying the first year of course credits at the outside university or college to the student's final year of courses at WCU.
		- The initial point of contact for these agreements is Josh Auld, PhD. (jauld@wcupa.edu).