

CREATING A CULTURE OF COMPLIANCE

Utah System of Higher Education

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GRAND RIVER | SOLUTIONS

MEET YOUR FACILITATOR



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Andrea Stagg J.D. joins Grand River Solutions as with extensive experience in higher education in-house legal settings at public and private colleges and universities. In this role, Andrea oversees the Consulting Services of Grand River Solutions. This includes Title IX and equity support, audits and compliance reviews, athletics consulting, accessibility and disability compliance, equity initiatives, and Clery Act compliance solutions.

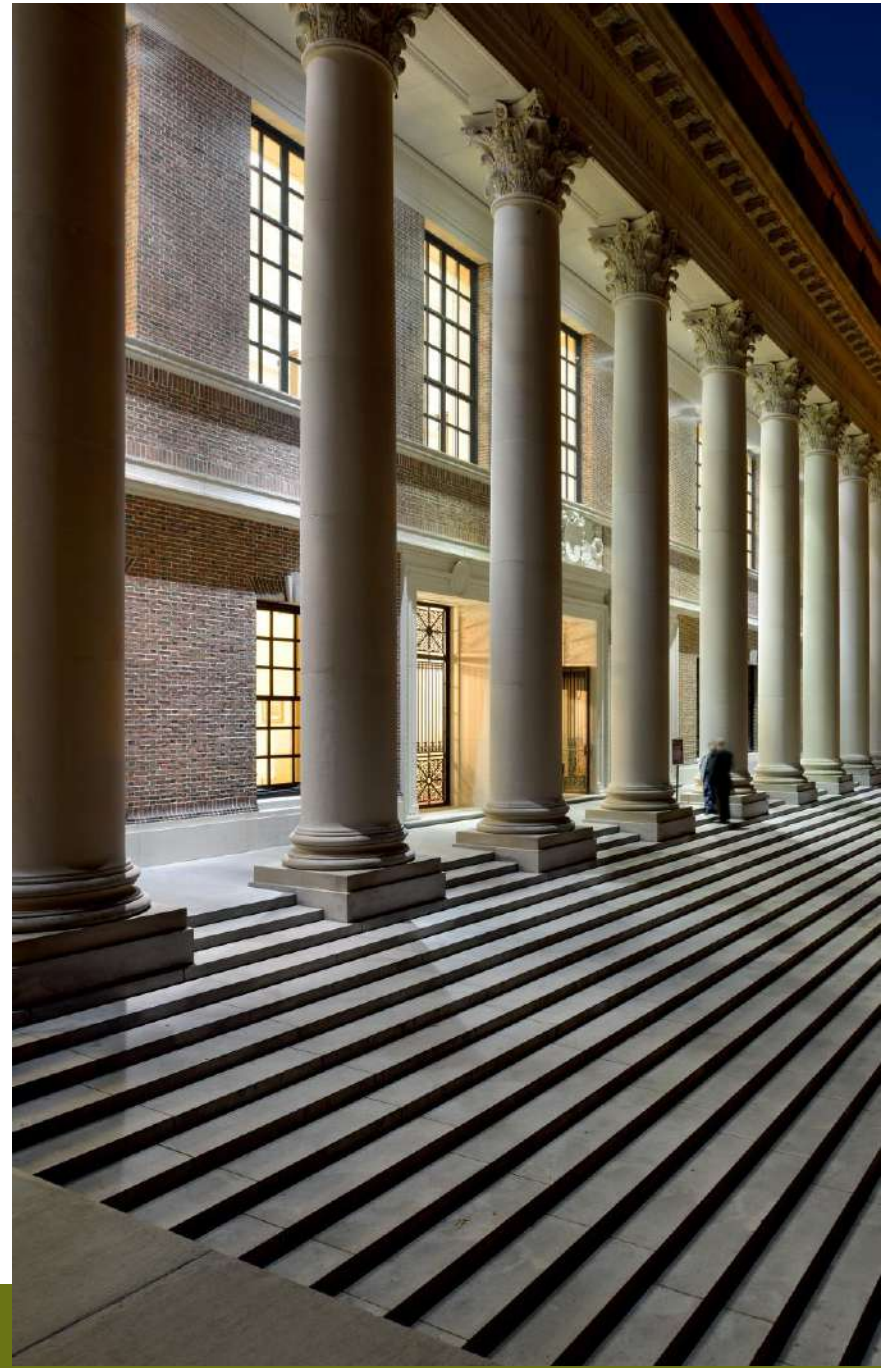
AGENDA

- Overview
- Top Risks, Interconnected
- Creating a Culture of Compliance IS Risk Management!
- Strategies
- Questions

OVERVIEW

Why do we do what we do?

- Law/regulation
- Relationship/agreement
- **It's the right thing to do**



WHAT DO WE DO? BIG PICTURE

- Policy development
- Follow the policies
- Training
- Documentation and recordkeeping



Risk Mitigation x Compliance Culture

The same set of best practices are essential for creating a culture of compliance AND for mitigating risk.

- Consistency
- Clarity
- Transparency
- Where?
  - In messaging to the campus community
  - In policy application
  - In communications with participants in processes

Top 10 Risks, 2026 Survey

1. Admissions and Retention
2. Data Security
3. Compliance (Non-Title IX/VAWA)
4. Operational Pressures
5. Facilities and Deferred Maintenance
6. Funding/Financial Stability
7. Student Mental Health
8. Recruitment and Hiring
9. Public Safety
10. Athletics

Source: https://www.ue.org/globalassets/risk-management/reports/top-risks-report-he-2026.pdf

Top 10 Risks, 2026 Survey 2

- UE report based on members' reported risks via survey
- For the first time in 5 years, Title IX was not in the top 10 of reported risks
- But jumping up the list in the most recent survey was "Compliance (Non-Title IX/VAWA)"
- Compliance was ranked 7th and 8th over the past 5 survey years

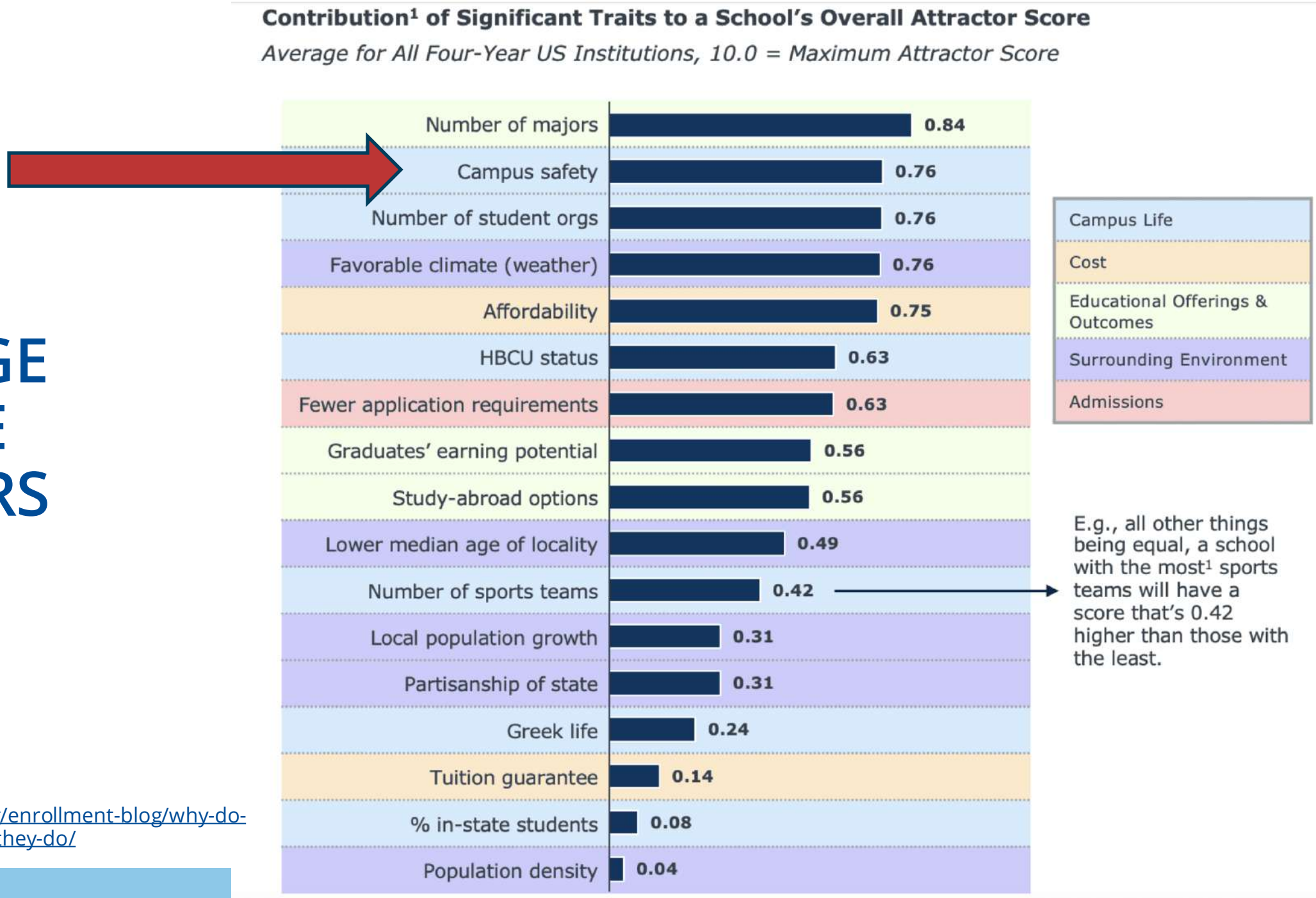
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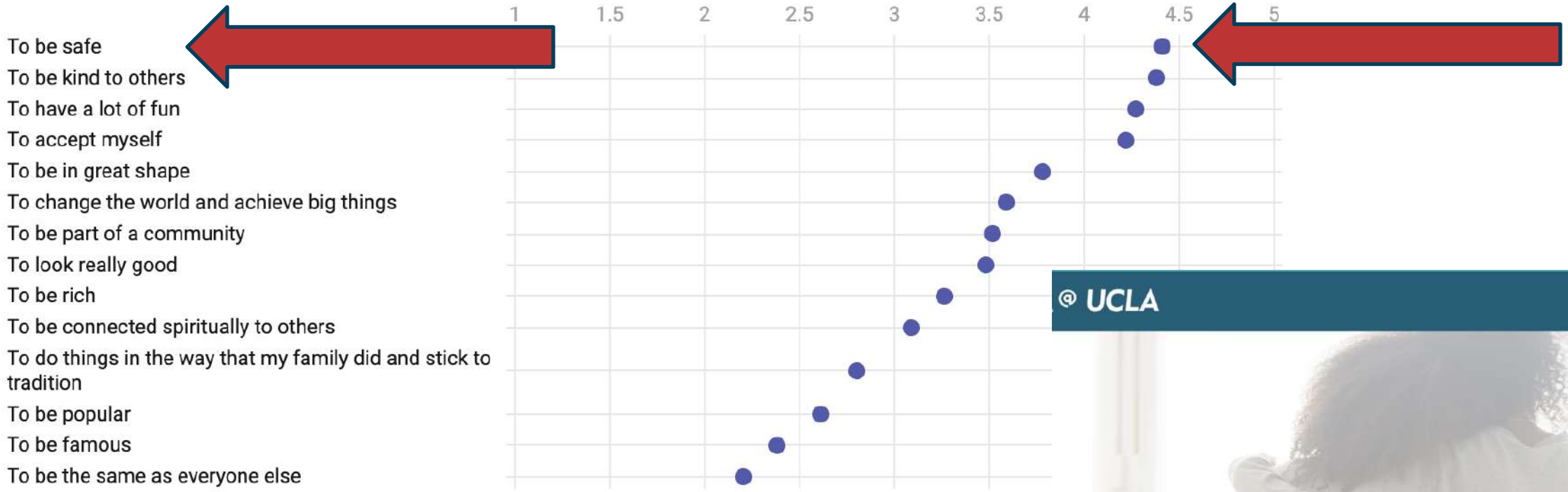
COLLEGE CHOICE FACTORS



https://eab.com/resources/blog/enrollment-blog/why-do-students-pick-the-schools-that-they-do/

Young Americans prioritize safety over other goals

A recent survey of 1,644 young people across the U.S., ages 10 to 24, asked participants to rate the importance of 14 personal goals on a scale of 1 to 5, with 1 meaning "not important" and 5 meaning "very important." The goals included classic teenage desires such as "being popular," "having fun" and "being kind." The No. 1 answer was "to be safe."





FUTURE APPLICANTS' PRIORITIES

- https://www.scholarsandstorytellers.com/teens-screens-24

We Know From Climate Surveys…

- Students who report to have experienced sexual misconduct disclose via surveys that they disproportionately consider leaving school and experience mental health impacts
- Back to the top risks:
  - Retention, recruitment (students AND employees)
  - Student mental health
  - Compliance

How Do We Mitigate?

- Centralize compliance functions.
- Evaluate compliance policies and procedures in complex areas.
- Seek specialized outside counsel if permitted.
- Create process for monitoring statutory and regulatory changes.
- Update electronic privacy and record retention policies.

Source: https://www.ue.org/globalassets/risk-management/reports/top-risks-report-he-2026.pdf

SPECIFIC STRATEGIES



- One office with overall responsibility
- All reports receive a timely response
- Remember: a reduction in reports is not a reduction in incidents
- Data collection/tracking and reporting, whether broad or internal/to leadership
- Climate surveys – you cannot know how much work you need to do without a measurement
- Training and then effectiveness assessments and retooling

CLIMATE SURVEYS





USU Launches 2025 Campus Climate Survey on Sexual Misconduct

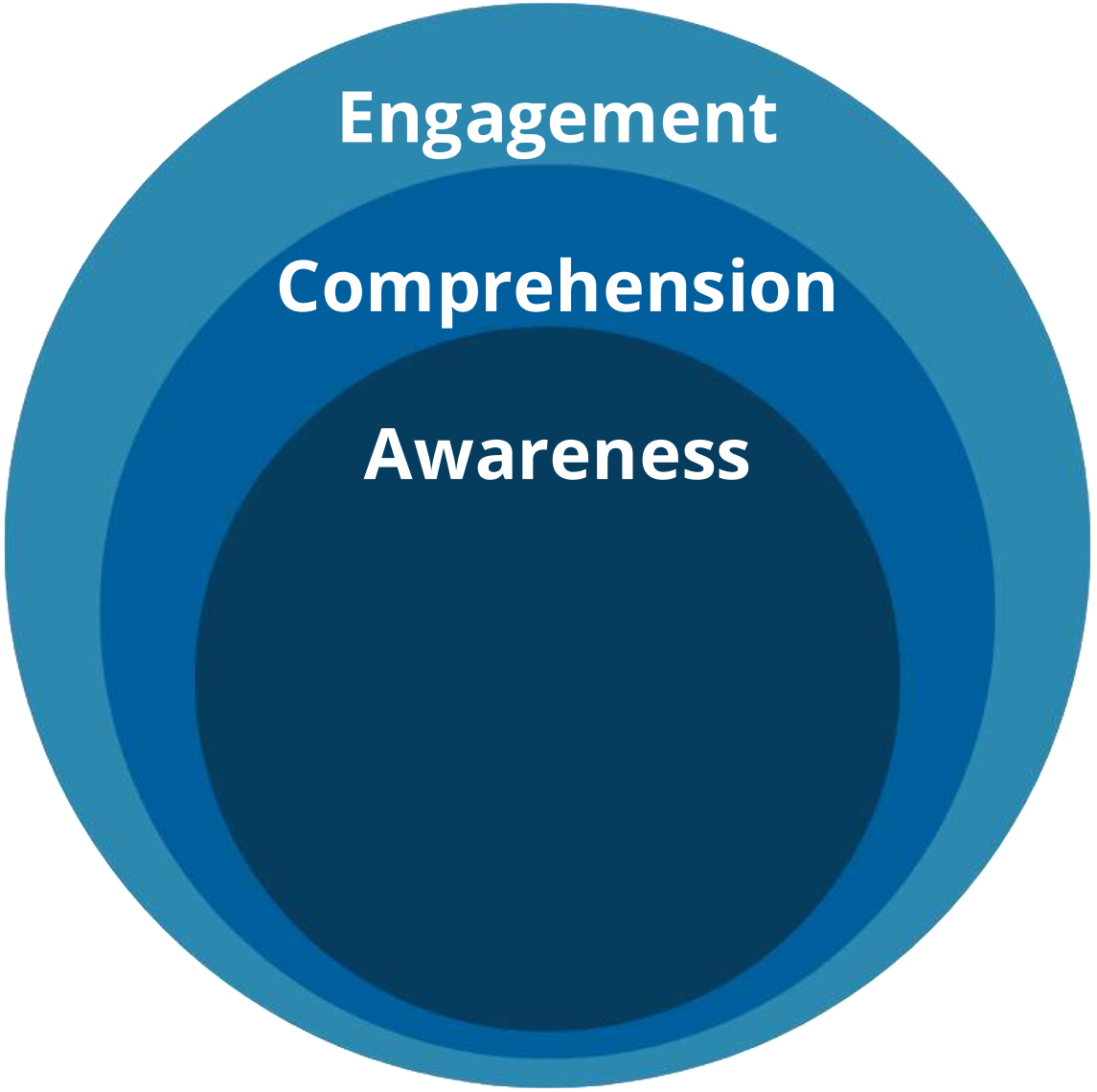
April 11, 2025

SPECIFIC STRATEGIES (2)



- Hearings may drive down litigation costs, but they drive down reporting
- Prevention, then a little more, and then some more
  - Meet students (and employees) where they are; figuratively and literally
  - Take a curriculum approach
  - Dosing

Levels of Understanding



Awareness

- Policy/procedure training
- Responsible employee training

Comprehension

- Community awareness
- Reporting

Engagement

- Builds trust and understanding.

ELEMENTS OF ANNUAL TRAINING STRATEGY

- Identify population to be trained
- Determine topic
- Schedule the training
- How will you deliver the training
- Partnerships
- Communications
- Community input/feedback
- Engagement as passive education



ONGOING ASSESSMENT OF TRAININGS



COMMUNITY PARTNERS?

Board of Trustees

Law Enforcement

Advocacy Groups

Health Care Providers

Attorneys

Media

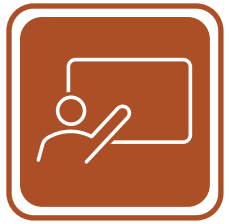
COMMUNICATE TRAINING SUCCESSES



Annual Report



On Your Website



When training



In conversations

GATHERING MEANINGFUL DATA



MAINTAINING CASE DATA—WHY?

Track all incoming reports and know the status

Document process decisions and deviations, if any

Identify patterns, trends, systemic issues

Identify training and prevention needs

Audits, lawsuits

Advocating for additional support

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