



Assessment Report

Office of Legal Affairs

July 1, 2017 – May 31, 2020

15 June 2020

North Carolina Agricultural and Technical State University
Assessment Report

Unit: Office of Legal Affairs (OLA)
Period Covered by Report: July 1, 2017 – May 31, 2020
Unit Head: Melissa J. Holloway, Esq.

I. Mission Statement

The Office of Legal Affairs (OLA) at North Carolina A&T State University supports the University in its endeavors to achieve its academic mission and strategic plan while adhering to the University's ethical, legal, and regulatory responsibilities. In providing that support, the OLA of will:

- Lead the University in fostering and maintaining a culture of ethical behavior and accountability.
- Coordinate, advise, and support the activities of the University's administrative units in their legal, ethical, compliance, risk management, and audit responsibilities.
- Provide the Board of Trustees with a comprehensive review of the University's legal, ethical, compliance, and risk management.
- Provide comprehensive, timely, collegial, and high-quality advice to equip the Board of Trustees, administrators, faculty, and staff to make decisions that are in the best interests of the University.
- Facilitate creative and collaborative legal, compliance, and risk management solutions to further the University's goals and initiatives.
- Promote a culture of compliance, risk awareness, and risk management across the University.
- Work with University personnel to identify, prevent, and correct any compliance deficiencies.
- Promote a safe and healthy campus environment through compliance with Title IX of the Education Amendments of 1972 and the Campus Sexual Violence Elimination Act (Campus SAVE).

II. Outcome Statements

Aligned with the goals outlined in the University's strategic plan, *A&T Preeminence: Taking the Momentum to 2023*, and its predecessor, *A&T Preeminence 2020*, the primary objectives/goals for the Office of Legal Affairs for the last three years have been to:

- A. Create and implement an Enterprise Risk Management (ERM) program to establish a systematic organization-wide approach to proactively manage campus risks.
- B. Create and implement a university-wide Ethics and Compliance program based upon the nationally accepted foundation of the United States Sentencing Commission's seven elements of an effective compliance program.
- C. Enhance the University's Title IX prevention and education program through the following;

- *Development a stronger system of accountability related to the university’s responsibilities around sexual violence;*
 - *Provision of seamless access to resources for students, faculty, and staff impacted by sexual violence;*
 - *Improve and enhance the training of university employees relative to sexual harassment and violence and their responsibilities under Title IX and other laws; and*
 - *Creation of a sexual misconduct hearing board with specialized training in hearing matters of sexual misconduct and violence.*
- D. Promote OLA staff professional development to enhance the effectiveness and visibility of the Office of Legal Affairs and its attorneys within the University community through enhanced and continued engagement with administrators, supervisors, faculty, and staff through increased training opportunities and communications with units; as well as the local, state, and national legal communities/professional organization.
- E. Improve the University environment through enhanced outreach programs and in collaboration with our constituents and partners.
- F. Development and implementation of a revised University-wide comprehensive policies related to COI/COC to supplement research conflict of interest policies.

III. Administrative Unit Outcomes

Administrative Outcome	Assessment Methodology (Measure)	2017-2018 Target/Findings	2018-2019 Target/Findings	2019-2020 Target/Findings
Create and implement an Enterprise Risk Management (ERM) program to establish a systematic organization-wide approach to proactively manage campus risks.	Measure 1: Identify Cabinet level risk owners and host ERM workshop to provide training on the ERM principles and process and to review and update risk identification process	Identify and provide ERM overview and process training to BOT and Cabinet level risk owners; Establish baseline risk priorities Outcome: Complete	Host ERM workshop to revisit, review and revise risk priorities and mitigation efforts. Outcome: Complete	Host ERM workshop to revisit, review and revise risk priorities and mitigation efforts. Outcome: delayed due to COVID 19. Workshop to be scheduled in January-February 2021.
	Measure 2: Complete Financial Aid Regulatory Compliance Review	Define and develop framework for review; work with financial aid staff and internal audit to complete review. Outcome: Complete	Create framework for compliance ongoing program and develop written set of standards of ethical conduct Outcome: Complete	Regular compliance reviews based upon compliance calendar. Outcome: Ongoing

	Measure 3: Complete Division of Research (DORED) policy/compliance review	Create framework for review and begin data collection working with Internal Audit. Outcome: Review schedule created and communicated.	Create framework for compliance program and develop written set of standards of ethical conduct Outcome: Policy review completed with revisions and new policies approved.	Regular compliance reviews based upon compliance calendar. Outcome: Ongoing
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Create and implement a university-wide Ethics and Compliance program based upon the nationally accepted foundation of the United States Sentencing Commission’s seven elements of an effective compliance program.	Measure 1: Establish and obtain Board of Trustee Approval of the University Compliance Program and Standards of Ethical Conduct (CPSEC)	Policy creation and publication for public comment and feedback. Outcome: Draft program a policy approved for posting a public comment for campus-wide feedback by Cabinet.	Provide compliance training to Board of Trustees a Cabinet and Obtain Board of Trustee policy approval. Outcome: CPSEC approved by Board Feb. 2018. Training provided 2018 summer retreat	Regular updates to Cabinet and Board; creation of biannual compliance activity report. Outcome: Cabinet and Board updated quarterly with written reports. Biannual report completed and presented November 2019.
	Measure 2: Develop schedule for regular compliance trainings and updates to Cabinet, Board, Deans, Department Chairs, and general campus community.	No target for the 2017-18 year	Offer a minimum of 6 training program in compliance related areas. Outcome: Complete – 12 training sessions offered.	Offer a minimum of 10 training programs in compliance related areas. Outcome: Complete – 15 training sessions offered.
Enhance the University’s Title IX prevention and education program	Measure 1: Create standalone Title IX office under the authority of the Office of Legal Affairs; appointment of a full-time permanent Title IX Coordinator.	Obtain approval for stand-alone Title IX officer reporting to Office of Legal Affairs and budget for departmental activities. Outcome: Complete	Create Title IX strategic plan. Outcome: Complete	Provide annual report to Chancellor and Board of Trustees of the status of the strategic plan and impact of new Title IX regulations. Outcome: Complete, June 2020.

	Measure 2: Enhance Title IX website and creation of an online Title IX tool kit.	No target for the 2017-18 year	Integrate the Title IX function into the Office of Legal Affairs. Outcome: Complete; new staff hired and strategic plan created.	Complete website design. Outcome: Incomplete; University website redesign and COVID-19 impacted full implementation. In-progress. Full implementation by May, 2021
	Measure 3: Establish and provide training for sexual misconduct board focused on the adjudication of student Title IX complaints.	N/A	N/A	Appoint sexual misconduct board; provide 3 training sessions for members and Dean of Students staff. Outcome: Complete; structure will change 20-21 due to new Title IX regulations.
Promote OLA staff professional development to enhance the effectiveness and visibility of the Office of Legal Affairs and its attorneys within the University community through enhanced and continued engagement with administrators, supervisors, faculty, and staff through increased training opportunities and communications with units; as well as the local, state, and national legal communities/professional organization.	Measure 1: Track the Office of Legal Affairs members' attendance and/or number of presentations at conferences.	At least 50% of staff will attend or present at a conference annually. Outcome: For the 2017-2018 fiscal year, 25% of /staff in the Office of Legal office attended or presented at a conference	At least 50% of staff will attend or present at a conference annually. Outcome: For the 2018-2019 fiscal year, 50% of /staff in the Office of Legal office attended or presented at a conference	At least 50% of staff will attend or present at a conference annually. Outcome: For the 2019-2020 fiscal year, 75 % of /staff in the Office of Legal office attended or presented at a conference. OLA staff member recipient of distinguished service award from the National Association of College and University Attorneys (NACUA)
	Measure 2: Track the number of outreach activities, including training, offered by Office of Legal Affairs Staff	Increase number of training and campus outreach by 10% Outcome:	Increase number of training and campus outreach by 20% Outcome:	Increase number of training and campus outreach by 25% Outcome:

<p>Development and implementation of a revised University-wide comprehensive policies related to COI/COC to supplement research conflict of interest policies.</p>	<p>Measure 1: Draft new policy consistent with BOG guidelines for preliminary approval and campus comment; obtain Board approval of policy</p>	<p>No target for the 2017-18 year</p>	<p>Obtain Cabinet approval of draft policy. Outcome: Incomplete. Policy development delayed due to changes in leadership in Human Resources and Office of Legal Affairs.</p>	<p>Outcome: Policy approved by Cabinet and Board effective Sept. 2019.</p>
	<p>Measure 3 Coordinate policy roll out and education with the Division of Human Resources and resume annual COI/COC form collection from all employees.</p>	<p>No target for the 2017-18 year</p>	<p>No target for the 2018-19 year</p>	<p>Outcome: Policy roll and training provided; HR coordinated new document creation and submission</p>

IV. Conclusion

The Office of Legal Affairs has taken on significant additional responsibilities during the reporting cycle including, but not limited to, functions related to compliance, enterprise risk management (ERM), and Title IX. The University continues to support the growth of the office with investments in new staff positions, training, and resources for each distinct function. This support has allowed the Office to reach significant milestones over the reporting period.

V. Improvements

Based upon the finding of our ongoing assessment process the Office of Legal Affairs has identified the following areas for continuous improvement:

- need to enhance its web presence and capability to interface with our University clients, colleagues and business partners in an advanced electronic environment;
- need to develop and implement a client service rating (and establish a baseline rating) to ensure that quality, sound, and timely legal services are provided to clients with goal of continually increasing client satisfaction rating on an annual basis; and
- need to improve the University’s ability to respond to significant public records requests. Improve the University’s ability to respond to significant public records requests.