FY25 ANNUAL PLAN

OFFICE OF COMPLIANCE AND RISK MANAGEMENT

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INTRODUCTION

The Office of Compliance and Risk Management (OCRM) integrates compliance and risk priorities into one centralized, cohesive, and effective structure. The OCRM provides a centralized approach to developing and implementing an effective and impactful risk management and compliance structure as well as promoting and maintaining a culture of ethics and integrity.

This Annual Plan provides a high-level overview of the OCRM and how it has and continues to serve the Universities of Wisconsin in their compliance, ethics, and risk management responsibilities. It also aligns its overall goals and objectives with the Universities of Wisconsin's 2023-2028 Strategic Plan.

OVERVIEW OF OCRM

OCRM consists of the Office of Compliance and Integrity (OCI) and the Office of Risk Management (ORM). The two offices were combined in September 2022 to form the new OCRM, providing a centralized approach to developing and implementing effective and impactful risk management and compliance structure as well as promoting and maintaining a culture of ethics and integrity. This integration of compliance and risk priorities creates one cohesive and collaborative structure within the Universities of Wisconsin Administration. OCRM provides compliance and risk management services, guidance, and support to the Universities of Wisconsin to successfully perform their administrative, operations, and compliance related activities.
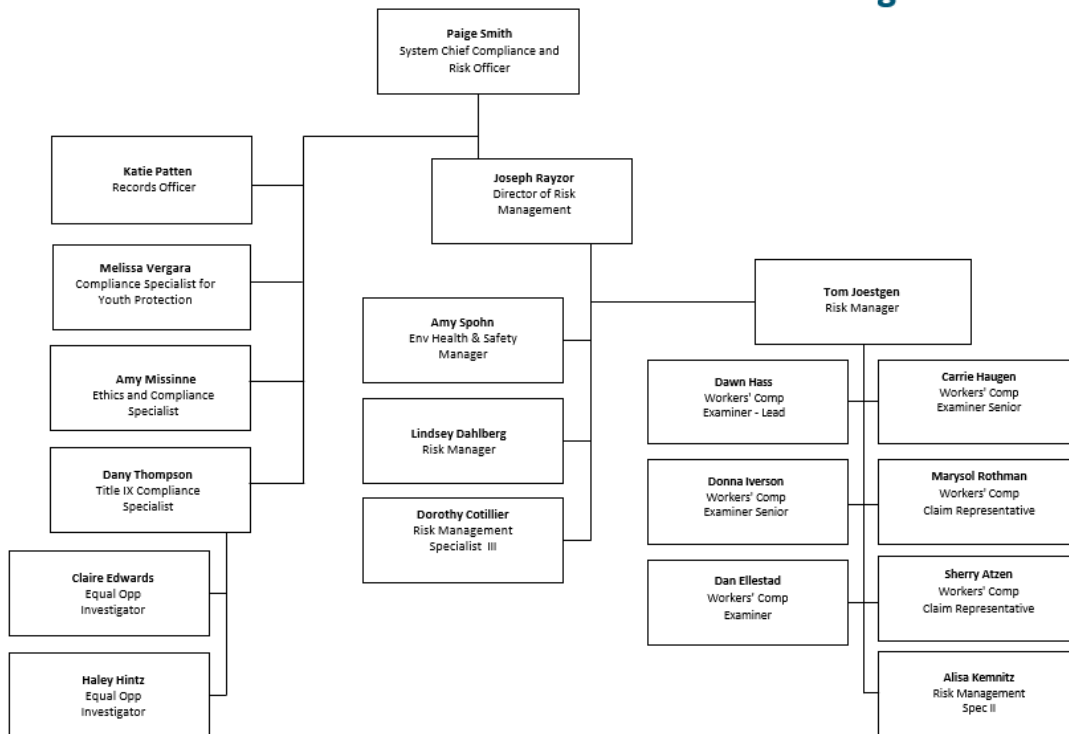
Office of Compliance and Integrity

The **Office of Compliance and Integrity (OCI)** provides support and services to the Universities of Wisconsin in identifying and fulfilling compliance obligations under federal law, state law, and the Universities of Wisconsin policies and procedures. We seek to create and promote a culture that moves beyond regulatory compliance to one that embraces ethical behavior and integrity across the Universities of Wisconsin.

The Office of Compliance and Integrity was established through collaboration with the UW System Compliance Officer Working Group and approved by the UWSA Risk and Compliance Council and the Board of Regents Audit Committee in 2019. Its work is founded in Six Guiding Elements that were selected based on a review of external sources, primarily the Federal Sentencing Guidelines of the U.S. Sentencing Commission and the United States Department of Justice 2019 Guidance, Evaluation of Corporate Compliance Programs.

Guiding Elements of the Universities of Wisconsin Compliance Framework

HIGH LEVEL OVERSIGHT	WRITTEN POLICIES AND PROCEDURES	COMMUNICATION, EDUCATION, TRAINING	MONITORING AND AUDITING	REPORTING AND INVESTIGATION	CULTURE OF ACCOUNTABILITY, ETHICS, AND INTEGRITY

Areas of Focus

- Compliance Matrix Management (regulatory tracker and reporting notification)
- Title IX and Sexual Misconduct
- Clery Act
- Youth Protection
- Public Records
- Records Management
- Ethics and Conflicts of Interest
- State Authorization of Distance Education Programs
- Investigative Services

Office of Risk Management

The **Office of Risk Management (ORM)**, in service to the Universities of Wisconsin, the State of Wisconsin, and the public good, collaborates with our partners across the state to advance innovation, safety, and the 2023-2028 Strategic Plan. We accomplish this through collaboration, empathy, integrity, stewardship, and the pursuit of truth.

Support in Achieving Strategic Goals

In the Office of Risk Management, we embrace the Universities of Wisconsin's 2023-2028 Strategic Plan, and specifically strive to encourage a risk management culture that advances the strategies outlined in that plan. Our office assists our partners across the state in engaging with the risks that may prevent them from implementing the 2023-2028 Strategic Plan and, equally as important, we assist in managing any risks generated from implementing the strategic plan. Through this engagement, our partners find support in creating resilient and successful approaches that support them in achieving the UW's strategic goals.

In the Office of Risk Management, we are focused not on reducing risk, but instead on reducing the total cost of risk, recognizing the importance of opportunity cost and the UW's commitment to innovation as outlined in the strategic plan.

Support in Achieving Operational Excellence and Cost Reduction

The Office of Risk Management supports our system and campus partners in various ways as they strive to achieve their specific functional, program, and divisional goals. This includes:

- Administering the relevant sections of the State of Wisconsin Statutes related **to risk management, insurance, and liability**. Working with our colleagues across the system to establish policies and procedures that effectively manage the UW's risk within the confines defined by statute.
- Administering the state's **self-funded insurance program** for the UW. This includes program coverage analysis, premium allocation, claims handling, and loss control. Working with Bureau of State Risk Management to drive down the total cost of risk transfer for the UW and ensuring competitive rates given current market conditions.
- **Negotiating and procuring insurance policies** on behalf of the UW, when prudent and necessary, in instances when coverage is not offered through the Bureau of State Risk Management.
- Assisting our campus partners in the development and maintenance of appropriate **facility use agreements, affiliation agreements, and contract language** related to risk management and insurance. Ensuring risk is effectively transferred and that the UW is not taking on any unnecessary cost of risk via contract.
- In the unfortunate event of an employee injury, managing the claims process for **workers' compensation claims** on behalf of the universities with compassion, a high level of customer service, and a focus on efficiency.
- Partnering with the UW Madison's Emergency Management Office to develop, implement and enact **emergency management systems**, including planning, programs, policies, and responses.
- Providing support to the universities related to **environmental, health, and safety issues**, including hazardous waste disposal, loss control, and occupational safety.

OCRM Core Values

The OCRM is committed to living out core values in its daily functions and duties. The following core values are reflected in OCRM's duties and functions for the benefit of those it serves.

PURPOSE-DRIVEN
- **Service:** An essential aspect of the Universities of Wisconsin is to serve the State of Wisconsin and the public good.

PEOPLE-FOCUSED
- **Collaboration and teamwork:** We appreciate and understand that our best work is done working together in teams in a collaborative and supportive environment.
- **Diversity:** We are committed to diversity, equity, inclusion, and belonging. These principles are key to our long-term success.
- **Mutual respect and trust:** We support an environment of civility, trust, collegiality, open and honest communication, and mutual respect by building a sense of community and caring among faculty, staff, students, and community partners.

COMMITMENT TO STEWARDSHIP
- **Accountability:** We are committed to live our core values and deliver excellence every day. As a premier public university system, we are committed to providing an excellent educational experience for our students while ensuring accessibility, affordability, and cost-effectiveness.
- **Integrity:** We adhere to high standards of ethics and professionalism and safeguard the reputation of the Universities of Wisconsin.
- **Innovation:** We understand the importance of adapting to changing conditions in the world by being open to new ideas and continuously seeking solutions to challenges.

- **Sustainability:** We take the long-term view to ensure we are structured and supported to serve the people of Wisconsin for generations to come. We will leave the Universities of Wisconsin better than we found it.

FY25 GOALS

OCRM'S Goals for FY25 (fiscal year 2025) are aligned with the 2023-2028 Universities of Wisconsin Strategic Plan.

S3.1: ADVANCE AN INCLUSIVE AND ENGAGING WORKPLACE.

Provide **investigatory services** to UW in cases involving Title IX and EEO allegations of misconduct that may impact advancing an inclusive workplace and retaining high-quality, diverse staff.

Enhance the knowledge and understanding of **ethical duties and obligations** among all UW employees through new and innovative training programs and resources.

Work with university partners to create a **virtual on-demand hazardous waste training program** (currently training is only available once a year). Update the current hazardous waste website to ensure that it reflects current processes, is easier to navigate, and incorporates feedback from university partners.

Expand the scope of our **emergency management strategic focus** by partnering with UW-Madison's Emergency Management Office to create systemwide trainings, events and activities for awareness and understanding of health and safety risks posed to our campus community. Conduct a systemwide virtual tabletop exercise on a student-related threat scenario. Review and update for accuracy the UWSA's Continuity of Operations Plans (COOP) (25 plans).

S4.4: WORK WITH THE UNIVERSITIES TO IDENTIFY PRIORITY AREAS FOR STRENGTHENING OR CLARIFYING POLICIES ON CULTIVATING CRITICAL THINKING, CIVIL DISCOURSE, FREEDOM OF EXPRESSION, AND ACADEMIC FREEDOM ON ALL CAMPUSES AND FOR ALL COMMUNITIES.

Serve on the **WICCD Steering Committee** to provide guidance and support from a system-level compliance and risk perspective to ensure the goals and objectives of WICCD are aligned with the UW's policies and practices.

S5.2: IMPLEMENT SHARED SERVICES IN A COST-EFFECTIVE MANNER THAT PRESERVES BENEFITS FOR OUR UNIVERSITIES.

Reimagine the use and function of the UWSA Compliance Matrix to ensure that all compliance obligations across the UWSA and universities are known, fulfilled, and tracked in real time. Secure a new software system to increase the capacity of the existing Matrix using real-time data tracking, individualized report management, automated reminders, filing system, localized dashboards, and report generation for more timely and accurate compliance monitoring.

Analyze the rates, terms, and coverage for the UW Administration's **major insurance programs and purchases**, ensuring that the program is competitively priced and provides adequate coverage given current market conditions.

Complete Year 1 of the **Risk Compliance and Audit (RCA) pilot program**'s risk assessment phase with the remaining universities (UW-Madison will do its own) and UW Administration. Initiate Year 2 of the program by taking risk assessment results and identifying areas of opportunity and improvement in controls or treatments to mitigate and reduce risks.

Create a **compliance assessment and monitoring process** for improved accountability, communications, efforts, and results related to fulfillment of compliance obligations. Use information obtained from the UWSA Compliance Matrix, RCA results, audit findings, and general input from universities. Develop resources, charts, and other materials for the compliance monitoring process. Identify and share best practices for fulfilling compliance obligations and risk management efforts across the UW.

Develop and implement a new **UWSA Records Management Policy** to ensure that all records are collected, maintained, and disposed of in accordance with applicable policies and state law requirements.

Co-lead a systemwide workgroup to **implement new and improved processes and protocols** for academic labs and activities that collect, use and store donated cadavers and body parts.

Co-lead a **research security and compliance systemwide workgroup** to develop and implement new compliance-related programs, trainings, and guidance on non-financial compliance-related research activities at the comprehensive level.

In collaboration with UWSA Office of Student Affairs, Chief Information Technology, and Office of General Counsel, develop a UWSA-level compliance framework and support structure for ensuring that the UW is fulfilling the **digital accessibility standards and Title IX regulations** for its internet and public-facing web communications.

Co-lead the UWSA effort to **implement the new Title IX regulations**, including providing expertise in revising applicable administrative codes, policies, and procedures. OCI will develop and offer training programs and communications to UWSA and universities to understand and fulfill the changes required by federal law.

Develop an **internal online Title IX training program** for UWSA employees and students (due to discontinued use of outside vendor).

Partner with Grand River Solutions to **reimagine sexual discrimination online training** for students. Serve as resident experts on student experiences and perspectives.

S7.4: ENCOURAGE A CULTURE THAT RECOGNIZES THAT FAILURE IS A NECESSARY BY-PRODUCT OF AN INNOVATIVE PROCESS.

Encourage and foster a risk management culture that recognizes that failure is a necessary by-product of an innovative process. Incorporate this concept into at least 10 presentations during this fiscal year. New this year, develop an annual risk control recognition award to recognize the university who makes the best identifiable change to reduce risk while preserving opportunities for innovation.

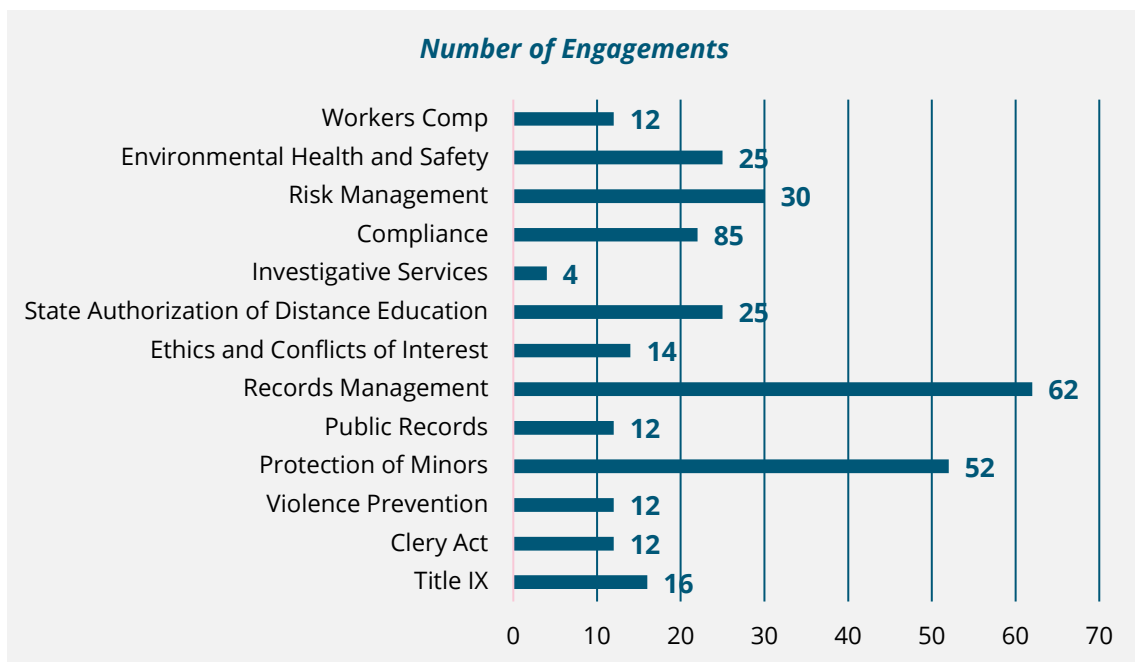# FY24 HIGHLIGHTS

Educational and Training Sessions

In OCRM's meaningful effort to support compliance efforts within the Universities of Wisconsin, a considerable aspect of that mission is to provide and promote **educational opportunities, community of practice engagements, facilitated meetings, and training sessions**. Here is summary of some of the successful efforts made in our areas of focus:

- OCRM hosted and presented a two-day conference entitled "**UW System Compliance Conference**" in July. Topics covered many areas including: records management; artificial intelligence; managing threats to campus safety; audit; investigative processes; legal updates; compliance structures and programs; and enhancing ethics culture.
- OCRM hosted and presented a two-day risk management conference for the universities. Topics covered included environmental health and safety updates, out-of-state and international workers' compensation coverage, cyber risk and insurance, an update on the DOA insurance programs, and **how UWSA can support and serve the universities**.
- The UWSA and Wisconsin Independent Association of Colleges and Universities (WAICU) co-sponsored the first **"2024 Wisconsin Higher Education Compliance Summit"** which included two days of presentations by well-known higher education experts in the field of compliance and risk.
- On a quarterly basis, OCI presents training sessions to new UWSA employees on **ethics and conflicts of interest** (by Amy Missinne) and **public records and records management** (by Katie Patten).
- OCI facilitated many educational and training sessions on **youth protection** and compliance including multiple sessions providing an overview of youth protection and compliance (by Paige Smith and Amy Missinne); 10 sessions discussing compliance with **SYS 625** (by Paige Smith and Amy Missinne); one session with the State of Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP; by Stephanie Sticka); four sessions on YARS (by Ron Schwartz); seven sessions on CampDoc (by CampDoc staff); six sessions on VolunteerMatters (by Ron Schwartz and VolunteerMatters staff).
- OCI shared information about free/no cost **national professional development opportunities** with campus contacts, such as: annual membership with the American Camps Association (ACA); webinar on Preparing for Emergencies in Campus Youth Programs (URMIA); webinar on Higher Education Protection Network (HEPNet) 101 Resources and Connections (HEPNet); webinar on Resources for Child Sexual Abuse Material Survivors/Victims and Image Takedown Possibilities (HEPNet); webinar on US DOE Final Regulations and SARA (NC-SARA); Wisconsin forum on Title IV Regulations on Professional Licensure (MHEC and Higher Education Licensure Pros); public forum on SARA Policy Modification Process (NC-SARA); etc.
- Dany Thompson facilitated educational presentations and training sessions on **Title IX topics** including investigations; working with minors and K-12 schools; upcoming regulation changes; and pregnant/expectant student reasonable accommodations.
- OCRM team members co-presented multiple sessions during the **UW Law Days Conference** in February of 2024 on a variety of topics including Title IX and K-12 Settings (90 attendees; Dany Thompson); Compliance with the Wisconsin Public Records Law (233 attendees; Katie Patten); Employee Ethics and Standards of Conduct (168 attendees; Amy Missinne); An Understanding of Risk Management Functions (137 attendees; Tom Joestgen and Paige Smith); An Overview of Environmental Health and Safety and Emergency Management Programs (98 attendees; Amy Spohn); Youth Protection in 2024 (119 attendees; Amy Missinne).
- Paige Smith presented the **RCA Pilot Program** to a variety of internal stakeholders as well as a number of external stakeholders, including the National System Compliance Officers Community, the NACUA Compliance and Risk Management Affinity Group and the UW-Madison Compliance Partners Network.
- Paige Smith presented at two NC-SARA webinars on **State Authorization and Professional Licensure** topics. She also presented updates to the SARA Coordinators, UW Education Deans and Provosts/SSAOs on state authorization and distance education regulatory changes.
- Twelve educational opportunities on professional and occupational licensure compliance issues were offered to the **SARA Coordinators** through our membership with The Bookmark. Those sessions included Best Practice Guide; Curriculum Comparisons (four sessions with different focuses); Final Title IV Regulations; Preparing for July 1, facilitated discussion on policies, procedures, and implementation; Better Practice Guide, examples, and templates for July 1 requirements; and Overview Onboarding for campus contacts (four iterations offered).
- OCRM facilitates monthly meetings with "**Communities of Practice**" to discuss recent issues, challenges and changes including, but not limited to, Clery Coordinators; Title IX Coordinators; Violence Prevention Specialists; Records Officers; Public Records Officers/Custodians; Precollege Liaisons; SARA Coordinators;

Compliance Officers; Risk Managers; Environmental, Health and Safety Managers; Workers' Compensation Coordinators.

- Paige Smith meets 1-1 with **UW Chancellors and Compliance Officers** on a monthly and/or quarterly basis to provide general updates related to compliance and risk-related issues and discuss issues or challenges facing those universities on their compliance and risk management efforts.

Communities of Practice by Name
Clery Coordinators
Title IX Coordinators
Violence Prevention Specialists
UW Records Officers Counsil (UWROC)
Public Records Custodians Group
Precollege Liaisons
SARA Coordinators
Compliance Officers
Risk Managers
Environmental, Health and Safety Managers
Worker's Compensation Coordinators

Number of Engagements

Category	Number
Workers Comp	12
Environmental Health and Safety	25
Risk Management	30
Compliance	85
Investigative Services	4
State Authorization of Distance Education	25
Ethics and Conflicts of Interest	14
Records Management	62
Public Records	12
Protection of Minors	52
Violence Prevention	12
Clery Act	12
Title IX	16

Policies and Procedures

OCI's Ethics and Compliance Specialist serves on the **UWSA Finance and General Administration Policy Committee (FGAPC)**. The FGAPC provides internal coordinated approval, revision, and regular review of changes to financial and administrative policies.

In collaboration with UW stakeholders, OCI has assisted in the development of a new **UWSA Records Management Policy** that will be implemented in the fall of 2024 to assist universities in complying with state law record

management laws and clarify employee roles and responsibilities in meeting legal obligations regarding records management and disposition.

OCI has continued to review and monitor the implementation of **SYS 625 Youth Protection and Compliance Policy** to meet the standards for youth protection and data collection under that policy. The policy's Frequently Asked Questions (FAQs) continue to be regularly revised and updated.

OCI serves on a **UWSA Cadaver and Body Donor Working Group** to provide guidance and support in the review of applicable policies, protocols, controls and management related to cadaver laboratories and best practices.

OCI worked with OHR in updating the **SYS 1290 Code of Ethics** Policy Guidance on Guidelines for Reporting Outside Activities under UWS 8.025 to include **Conflicts of Commitment**, **Nepotism** (pursuant with RPD 20-22), and **Consensual Relationships** (pursuant with RPD 14-8). Information and reminders about these topics were shared with all employees in the 2024 Annual Ethics Notification. These updates and reminders were intended to provide more detailed guidance and adherence to ethical issues and obligations under UWS 8.

ORM worked with OHR to update procedures related to **SYS 1230 Workplace Safety Policy**, to reflect the increase in the safety shoe allowance.

OCI collaborates with UWSA Administrators to review various policies and procedures, such as **SYS 12XX Paid Parental Leave Policy and FAQ** which will go into effect July 1, 2024, and **SYS 1293 Mandatory Employee Training Policy**.

Ethics and Conflicts of Interest

To enhance interest and understanding of **ethical laws and responsibilities**, OCI is changing the way in which it trains and informs UWSA employees on ethics and conflicts of interest. This work has begun and will continue through FY25.

In collaboration with the Office of Internal Audit (OIA) and Office of Human Resources (OHR), OCI has developed a new process under which UWSA employees may submit ethical questions or issues to the Compliance and Ethics Specialist in OCI. This information will be tracked and monitored to ensure UWSA maintains a **strong and ethical culture**.

Each year in collaboration with the Wisconsin Ethics Commission, OCI facilitates **Statement of Economic Interests (SEI)** filing. There are two categories of UW officials who file SEI: Officials who file by statute (state public officials) per Wis. Stat. § 19.42(10), our president, vice presidents, chancellors, vice chancellors, and regents; and Officials who file by rule (non-state public officials) per BOR rule per Wis. Admin. Code UWS 8, our contracting personnel as well as RPD 21-9: Institutional Relationships with Foundations, university employees who are executive directors of a university's primary fundraising foundation or real estate foundation. Filers are required to file their SEI annually on or before April 30. The charts below show a breakdown of filers by institution (submitted in 2024 reporting on 2023) and an overall summary of the data.

SEI Filers		
University	**Number of filers by statute (public officials)**	**Number of filers by rule (contracting authority**
UW-Eau Claire	5	21
UW-Green Bay	4	29
UW- La Crosse	4	17
UW-Madison	10	43
UW-Milwaukee	7	24
UW Oshkosh	6	8
UW-Parkside	4	13
UW-Platteville	5	9
UW-River Falls	4	27
UW-Stevens Point	5	21
UW-Stout	4	11
UW-Superior	4	14
UW-Whitewater	4	16
UW Administration	45	34
Total Number of Filers	**111**	**287**

SEI Filers	
Number of filers by statute (state public officials)	**111**
Number of filers by rule (contracting authority)	**287**

Faculty, Academic Staff, and Limited Appointees with half-time appointments or more are required to report annually **outside activities and interests** related to their areas of professional responsibility and for which they receive remuneration under UWS 8, Wis. Admin. Code: Unclassified Staff Code of Ethics. Filers are required to file their outside activity report (OAR) annually by April 30 each year. The charts below show a breakdown of filers by institution (submitted in 2024 reporting on 2023) and an overall summary of the data. *Note:* This data includes Faculty, Academic Staff, and Limited employees in a 50% position or more at some point during the calendar year of 2023 and have an active HRS record as of April 1, 2024, which is the start of the OAR reporting period; some of these employees may terminate during the month of April and ultimately won't be reporting and State Public Officials (SPO) were removed from this population as they aren't required to submit an OAR if they submit an SEI.

OAR Filers	
Campus	**Number of filers**
UW-Eau Claire	880
UW-Green Bay	638
UW- La Crosse	877
UW-Madison	15,137
UW-Milwaukee	2,367
UW Oshkosh	811
UW-Parkside	327
UW-Platteville	584
UW-River Falls	463
UW-Stevens Point	796
UW-Stout	683
UW-Superior	285
UW-Whitewater	876
UW Administration	437
Total Number of Filers	**25,161**

OAR Filers	
Number of filers	**25,161**

State Authorization Reciprocity Agreement (SARA) for Distance Education

 In response to new **federal regulations** and a **new NC-SARA policy modification process**, OCI has been very engaged and active in reviewing applicable laws and regulations, as well as policies, that impact UW in the areas of distance education programs, including state authorization, professional licensure, gainful employment, and financial transparency.

On behalf of the Wisconsin Distance Learning Authorization Board (DLAB), Paige Smith reviewed and approved the 2023-34 NC-SARA renewal applications for all thirteen universities for ongoing participation in SARA.

Paige Smith serves on and/or participated in seven different NC-SARA and Midwest SARA (M-SARA) committees and groups: M-SARA Regional Steering Committee; SPE Advisory Committee; NC-SARA Policy Implementation Team; NC-SARA PMP Analysis Working Group; M-SARA RSC Greenlight Working Group; NC-SARA Professional Licensure Working Group; and M-SARA SPE Meetings.

OCI worked in collaboration with the UWSA Office of Academic Affairs to secure the services of the **Higher Education Learning Professionals (HELP)** to provide a database software system that collects and updates state professional licensure and certification requirements which universities must review to fulfill federally mandated disclosures to prospective and current students.

Youth Protection and Compliance

OCI has been engaging with UW leaders and stakeholders daily to assist in the **policy implementation** of SYS 625: Youth Protection and Compliance that was issued in March 2022 and went into effect March 1, 2023. OCI has led weekly meetings and training sessions, collaborated with university stakeholders, developed a variety of checklists and resources, and facilitated group discussions. OCI has also repeatedly explained the importance for institutions to **assess their compliance under SYS 625**. To further assist institutions, a questionnaire was created for institutions to use as a living guide in evaluating how well they comply with the requirements under SYS 625.

UWSA secured and implemented three **centralized software tracking tools** to assist in meeting the compliance of SYS 625: **YARS** (Youth Activity Registration System; program registration), **CampDoc** (participant registration), and **VolunteerMatters** (volunteer registration). In partnership with Shared Services, a fourth tool for **Reference Checks** is in the pilot stages of implementation. OCI received commitment for the use of YARS, CampDoc, and VolunteerMatters from 12 campuses for each software tool.

Youth Protection Software Tool Commitments By UW Universities	
YARS	**12**
CampDoc	**12**
VolunteerMatters	**12**

Institutional data was collected for a reporting period of August 2, 2023, and March 1, 2024. There were 1,927 covered activities registered to operate at the 13 campuses. Per SYS 625, a covered activity is considered all events, operations, endeavors, or activities, regardless of location, that are designed for participation by youth participants and organized, sponsored and/or operated by the institution. A total of 43,723 youth participated in covered

activities that offered custodial care. A total of 10,586 employees/staff and volunteers participated in covered activities: 2,533 staff and 7,215 volunteers. *Note:* A couple campuses weren't able to filter their total number of staff and volunteers, thus the numbers of staff and volunteers doesn't equal the actual total of 10,586; this collective data doesn't include third-party covered activities.

Covered Activities That Occurred at Institutions Between August 2, 2023, and March 1, 2024	
Covered Activities	**1,927**
Youth Participants	**43,723**
Total Staff and Volunteers	**10,586**
Employees/Staff	2,533
Volunteers	7,215

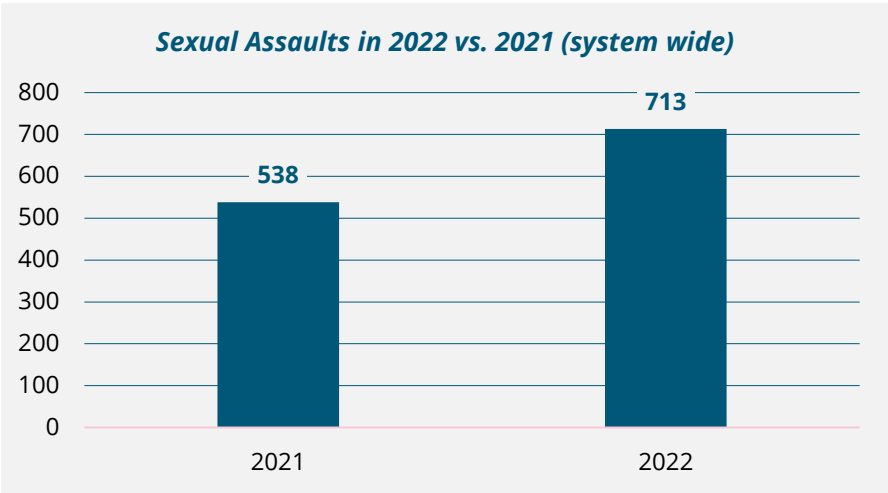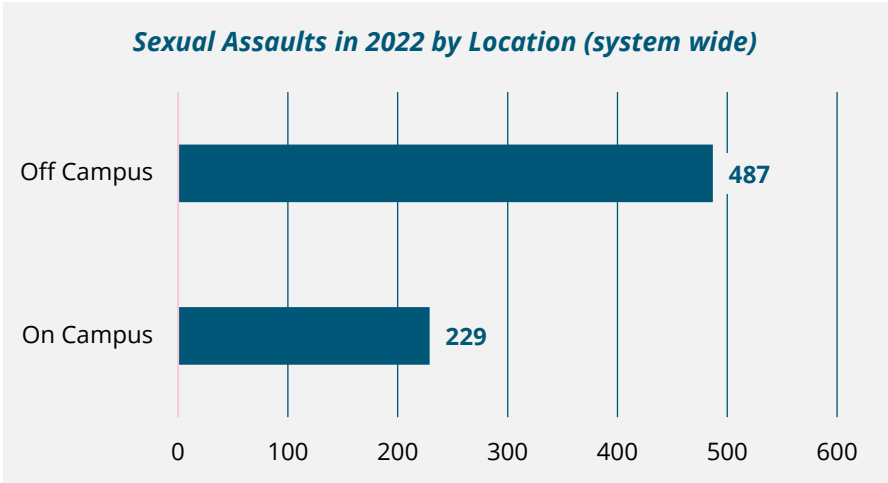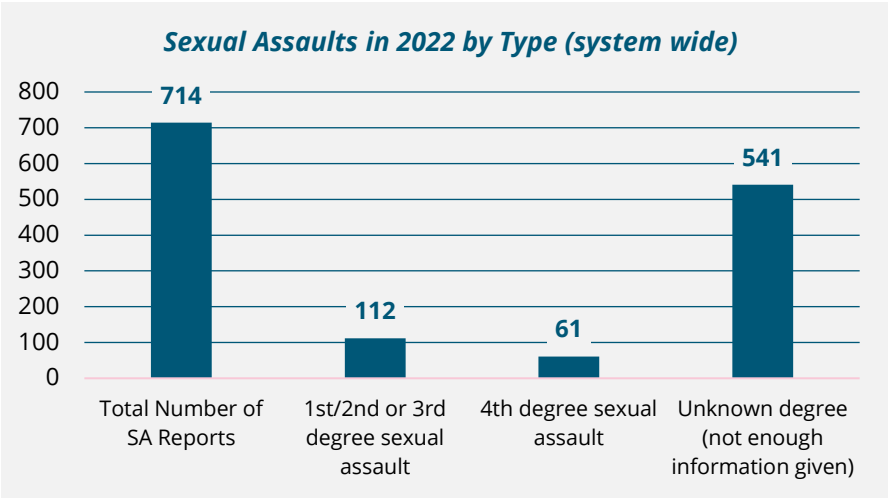## Title IX and Clery Act Compliance

Preparing for new Title IX Regulations

The Title IX Compliance Specialist partnered with the Office of General Counsel (OGC) to co-lead the "Tiger Team" which is comprised of high-level personnel involved in Title IX duties and functions. This group has been developing plans and processes in preparation for the proposed **changes to the Title IX regulations**. OCI also worked to collaborate with HR, Dean of Students, Title IX Coordinators, Athletics, and other high-level administrators to create two working teams, one for Policy and one for Administrative Code changes.

New Data Management Collection

OCI worked closely with Title IX Coordinators to develop a **benchmarking** process for collection and tracking of data on Title IX issues, cases, and activities.

The following data points are taken from the Wis. Stat. Chapter 36.11(22) Report that is submitted to the State of Wisconsin every calendar year. These statistics only include sexual assaults. [FN: Title IX defines sexual assault differently than Wisconsin State Statutes. Whereas 36.11(22) requires campuses to report sexual assault in degrees (1st, 2nd, 3rd, and 4th degree,) federal Title IX regulations starting in 2020 are different. They require campuses track sexual assault in the categories of Rape, Fondling, Incest, and Statutory Rape. Title IX regulations also require campuses to keep track of sexual harassment, sexual exploitation, dating violence, domestic violence, and stalking, but those statistics are not tracked in this document.] Research shows that an increase in reporting can be based on several factors, such as actual increase in sexual assaults, increase in a reporting party's confidence in the process and resolution, increase in pursuing supportive measures and resources, and other factors. (*continued on next page*)

Sexual Assaults in 2022 by Type (system wide)

Category	Value
Total Number of SA Reports	714
1st/2nd or 3rd degree sexual assault	112
4th degree sexual assault	61
Unknown degree (not enough information given)	541

Sexual Assaults in 2022 by Location (system wide)

Location	Value
Off Campus	487
On Campus	229

Sexual Assaults in 2022 vs. 2021 (system wide)

Year	Value
2021	538
2022	713

Expertise and Consultation

The Title IX and Clery Compliance Specialist communicated with Title IX Coordinators, Clery Coordinators, Student Conduct Officers, and Senior Student Affairs Officers on issues and cases related to the duties and responsibilities of these employees and groups.

Public Records and Records Management

With increasing scrutiny from the public and media, the workload on public records requests has been increasing. OCI processed a record high of 165 public records requests in 2023. However, despite the increase in requests, OCI managed to decrease the overall turnaround time by 10.5%. *Note that per the Wisconsin Public Records Law, a public records response should be received by the requestor "as soon as practicable and without delay."*

To further our work on youth protection, OCI worked through the Wisconsin Public Records Board approval process and created new records retention policies for youth protection records. This will ensure that the Universities of Wisconsin are properly retaining and disposing of youth-related records. In addition to the youth records retention policies, OCI also passed new retention policies for police records.

OCI provided numerous training opportunities for public records and records management, presenting at the Youth Protection Conference, the UW System Compliance Conference, UWSA New Employee and Employee Refresher trainings. The graphic pictured below shows UWSA specific requests (note this doesn't include OCI's assistance in processing requests at a university level):

Public Records Requests	
Requests Received	**165**
Requests Completed	**136**
Increase in Requests	**4%**
Average Turnaround to Close Request	**26 days**
Reduction in Turnaround Time	**10.5%**

RCA Pilot Program

During FY24 (fiscal year 2024), OCRM initiated a new pilot program called the RCA (**Risk, Compliance and Audit**) Program to create a university-focused risk assessment to promote the collaboration and engagement of leadership and operational directors in their identification, assessment, and management of high-level risks. The results of the university-level risk assessments were used to conduct a system-level assessment to determine the type, level, and urgency of treatments to reasonably manage risks.

As a part of the pilot, OCRM developed and offered training, videos, guidance, resources, and support to the first year participating universities and the UWSA Risk and Compliance Council. As a part of the assessment process, there were a total of 20 risks reviewed by one or more universities in their individual assessments (see list below). Out of those 20, 15 were discretionary (yellow) and five were preselected by UWSA (blue). The list below is in alphabetical order.

|			
🟨	Academic Readiness of Students	🟨	Marketing/Branding Challenges
🟨	ADA Accessibility	🟨	Modality of Academic Programs and Quality
🟨	Age/Maintenance of Infrastructure	🟨	Regulatory Compliance
🟨	Artificial Intelligence	🟨	Student Health and Wellness
🟨	Campus Crime & Safety	🟦	Student Recruitment and Retention
🟨	Competition in Distance Education Programs	🟨	Study Abroad / Study Away
🟦	Cybersecurity	🟨	Succession Management and Planning
🟨	Data Privacy	🟦	Title IX
🟨	Diversity, Equity & Inclusion	🟦	Workforce Recruitment and Retention
🟦	Financial Viability	🟨	Youth Protection Activities

Final assessment results and ratings will be used to benchmark existing ways in which universities are managing high-level risks as well as reveal opportunities for improvement.

Investigations

OCI provides **investigative services to UWSA and its universities**, upon request, for cases involving Title IX, sexual misconduct, harassment and discrimination, and employee and student misconduct. OCI investigators provide timely, consistent, and high-quality fact-finding investigations and written findings/reports. This service model reduces conflicts or alleged bias among university-level decision-makers, provides necessary support for offices with less capacity and/or expertise, and creates a strong, thorough record for well-informed decisions and defense of claims or appeals of a university's decision. OCI investigators operate in a dual model system, where both investigators are involved in each investigation; one takes a lead role, while the other assists.

Below are two charts that demonstrate the types of investigations handled and the significant growth in the number of investigations conducted for nine of the eleven comprehensive campuses.

Investigations by Type 2022 vs. 2023
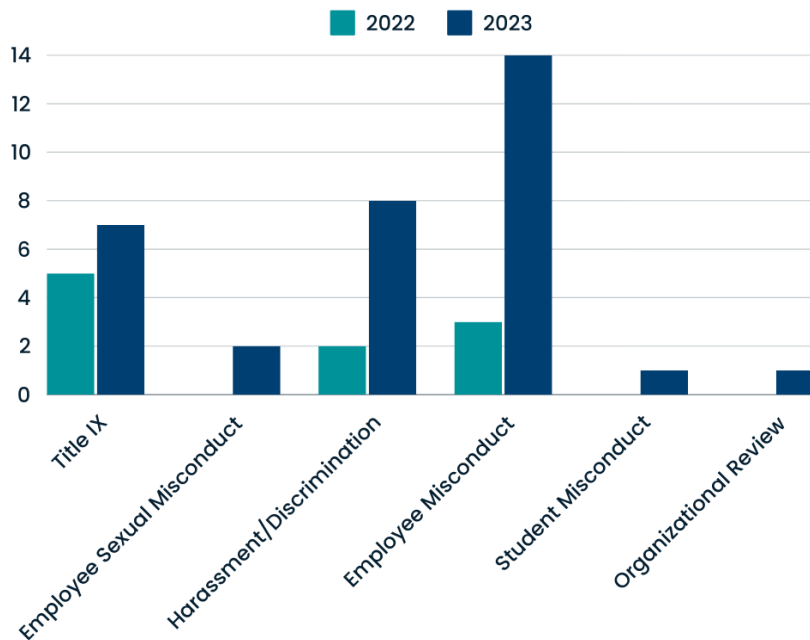
Investigations Hours and Cost (2023 – April 2024)			
Type of Investigation	**Total Investigations**	**Total Hours***	**Cost at $60 an hour**
Title IX	**10**	**317***	**$19,020**
Employee Sexual Misconduct	**2**	**37.5**	**$2,250**
Harassment/Discrimination	**9**	**319.5***	**$19,170**
Employee Misconduct	**16**	**618.5***	**$37,110**
Student Misconduct	**1**	**21**	**$1,260**
Organization Review	**1**	**22.5**	**$1,350**
Total	**39**	**1,336***	**$80,160**

Total hours include open cases as of 4/15/2024. Any dual investigation is counted as one investigator for purposes of time allocation.

Workers Compensation Claims Handling

In CY23 (calendar year 2023) the Office of Risk Management handled 1,342 newly reported claims, representing $3,969,714.08 in incurred costs.

Work Comp Claims Reported in CY23

Incurred Cost — Number of Claims
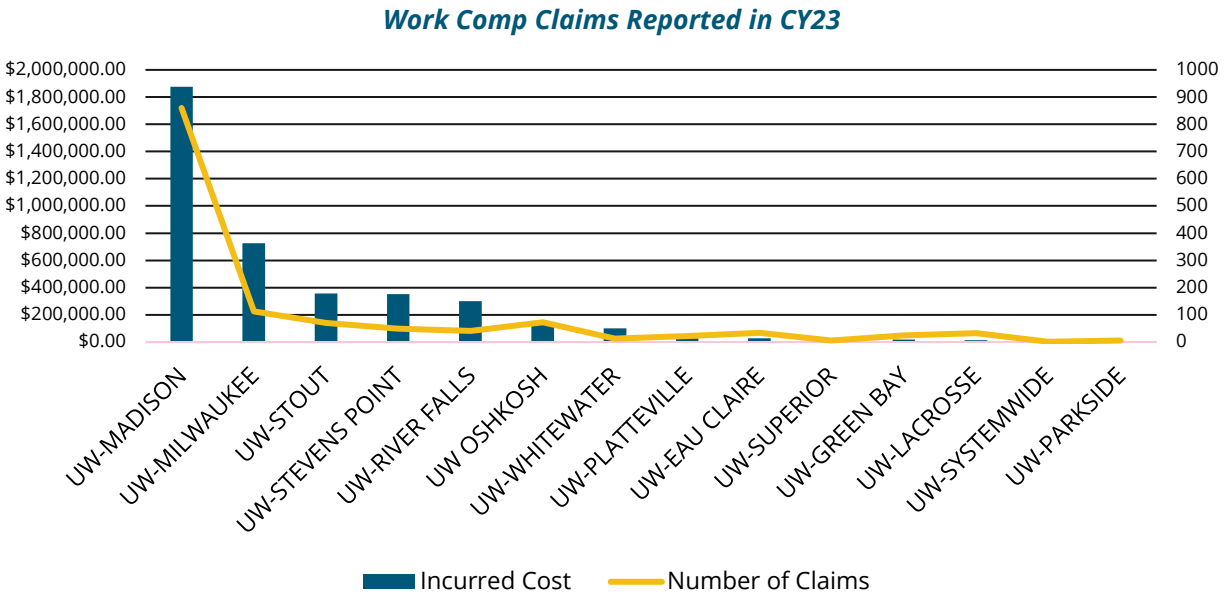
Commercial Insurance Program

In CY23 the Office of Risk Management assisted our partners in obtaining 33 policies outside of the insurance programs put in place by the Bureau of State Risk Management. This included the successful renewal of the Universities of Wisconsin cyber insurance program, which included a 19.32% reduction in premium, approximately $285,025 in savings and a lower retention.

33

Commercial Policies Purchased

$1,500,000

Premiums Paid

Premiums Paid
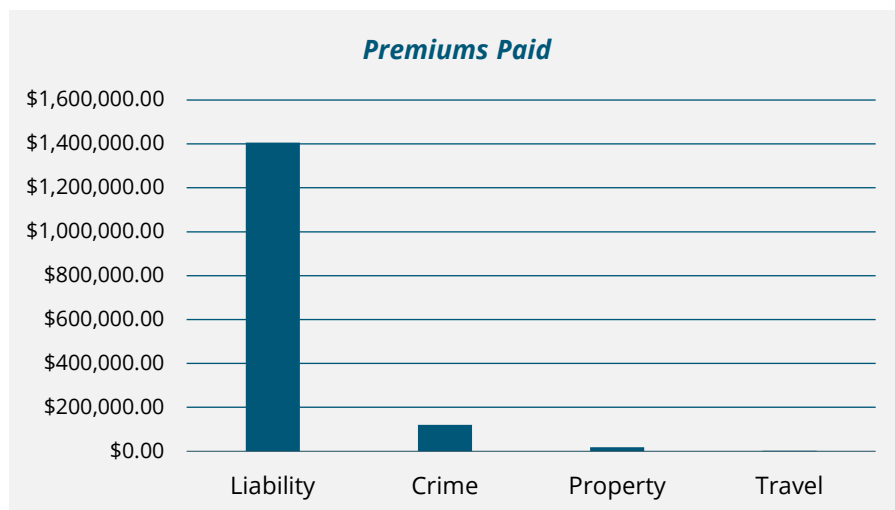
CONCLUSION

In conclusion, the OCRM team has been hard at work in assisting UWSA and its universities in fulfilling their compliance and risk management functions as well as providing a safe and healthy environment for faculty, staff, and students. OCRM is committed to ensuring its ongoing efforts align with the overall goals and objectives of the Universities it serves as well as the UWSA 2023-2028 Strategic Plan.