



Coordinating Civil Rights & Campus Safety Compliance

Overlapping obligations, options for organizing your program, and a framework that makes any structure defensible.



Lorna Fink, J.D.

Civil Rights & Compliance Consultant, Inovia Solutions
Lorna@inoviasolutions.com

- **10 years working on higher education campuses**—Including serving as Compliance Officer & Title IX Coordinator at a FICURMA member institution, overseeing discrimination & harassment, accessibility services, NCAA compliance, and youth protection campus-wide.
- **6 years consulting** — investigations, informal resolutions, and decision-making on civil-rights and compliance matters across higher-ed and K-12.
- **Builds the infrastructure** — designing campus-wide compliance programs and the automations that keep them running.



INOVIA SOLUTIONS





DISCLAIMER

This presentation does not constitute legal advice. While this training addresses important compliance topics, **we are not providing legal advice.** You are encouraged to consult your own legal counsel about the issues discussed here or any specific situation.

THE COMPLIANCE LANDSCAPE

Civil Rights Frameworks

TITLE VI

Race, color, national origin — including shared ancestry.

TITLE VII

Employment discrimination across protected traits.
Race, Color, Religion, Sex, National Origin

TITLE IX

Sex discrimination, Sexual Harassment, Sexual Assault, Dating Violence, Domestic Violence, Stalking..



ADA / 504 +

Bars disability discrimination; requires reasonable accommodations, equal access, and accessible facilities, programs, and technology.

CLERY / VAWA/STOP CAMPUS HAZING

ASR/FSR w/Policy Statements; Collect and Report Crime Statistics; CSAs; Timely Warnings and Emergency Notifications; VAWA provisions for grievance procedures and programming.

YOUTH PROTECTION

Mandated reporting when minors are involved; State laws; Background Checks; Training; External and internal reporting; Investigations.

OTHER PROTECTED STATUS DISCRIMINATION

Age, Genetic Information, Gender, Gender Identity, Gender Expression, Marital Status, Medical Condition, Sexual Orientation, Veteran Status, etc.

WHAT COMPLIANCE REALLY LOOKS LIKE...

- Single Sex/Race Scholarships or Programs
- Athletics
- Program Reviews
- Corrective Action Plans
- Student Housing
- Red Tape
- Training, Training, and More Training
- Accessibility and Related Appeals/Grievances
- Bias Incidents
- Threat Assessment
- Admissions and Recruitment
- Financial Aid
- Training, Awareness, Prevention, and Communication
- Supportive Measures
- Marketing
- Policy and Procedure Development
- Templates
- Identifying Risks and Compliance Issues outside of your subject matter that impact the institution
- Vendor Management
- Coordination with Law Enforcement and Community Agencies
- Investigations
- Personnel Management
- Pregnant and Parenting Students and Staff
- Public Relations
- Responding to Parents, the Public, the President
- Emotional Wellbeing and Mental Health
- Disgruntled employees, students, faculty, and parents
- FERPA Issues
- Supportive Measures
- Programming
- Website Development
- Faculty Pushback

STATS FROM THE FIELD

ATIXA 2025 State of the Field Survey — higher-education respondents on Title IX / Title VI integration

32%

Title IX Coordinators added
Title VI duties in the past 2
years

61%

Same person coordinates
Title VI and Title IX

13%

Have a dedicated Title VI
budget (28% share one)

34%

Use one investigation &
resolution process for both

WHERE THE TITLE IX OFFICE NOW REPORTS — MORE SPLIT THAN EVER

21%

Student Services /
Affairs

19%

EEO / Civil Rights

16%

Human Resources

11%

President / Provost /
Chancellor

10%

Dedicated Title IX Office

Source: ATIXA 2025 State of the Field Survey.

THE COORDINATION CHALLENGE

WHY FRAGMENTATION HAPPENS

- Continuous regulatory changes and enforcement focus shifts creates burned out employees that no longer have the energy to make big changes.
- **Unfunded mandates** — more compliance, no new staff or budget.
- **Silos** — Student Conduct, Title IX, HR, Campus Safety, and Disability Services each own a piece under their own policies and timelines.
- Without major issues or headlines, there is no impetus for improvement
- **Overworked administrators dismiss matters outside of their jurisdiction without connecting the dots**— dismissals trigger fresh intakes; the same facts spark parallel investigations and uneven Clery and VAWA compliance.



ONE EVENT, TWO CASES

A hazing report that includes sexual harassment — Title IX investigates one way, Student Conduct another.



THE REAL COST

Missed deadlines, inconsistent outcomes, eroded trust, and enforcement exposure.



MANY LAWS, MANY POLICIES, MANY ADMINISTRATORS, SAME INCIDENT

THE HIGH-LEVEL CHALLENGES FROM LACK OF COORDINATION

- **One incident, many laws** — a single report can trigger several at once, and the facts don't sort themselves by statute.
- **Many owners** — a Title IX Coordinator, HR/EEO, a 504/ADA Coordinator, a Clery officer; no one sees the whole picture unless you make them.
- **Different reach** — Title IX covers only your program or activity in the U.S.; the same conduct elsewhere means a different process but similar conduct.
- **Different subject-matter expertise** — HR knows Title VII but not VAWA grievance requirements; a Title IX harassment inquiry won't trigger an investigation of the hazing it occurred in.
- **Different things to publish** — nondiscrimination notices, the ASR, a Hazing Transparency Report, posted Title IX training, an accessible website; keep them current and consistent.



HOW CAMPUSES DIVIDE THE WORK

POLICY AND STRUCTURAL APPROACHES VARY

- **One uniform policy and central coordinating unit** — one nondiscrimination policy covers every protected status and every party.
- **Split by regulation/issue area under same coordinating unit**— a Title IX policy, plus a separate discrimination-and-harassment policy.
- **Split by party and administrative unit with one coordinating administrator**— Title IX stands alone; Student Conduct handles non-Title IX student matters; HR handles employee matters but one central individual takes responsibility for coordinating compliance amongst all areas. This individual is usually a senior level administrator with subject matter expertise that can coordinate compliance rather than being a practitioner.
- **Split by party and administrative unit with no oversight over all** - Title IX stands alone; Student Conduct handles non-Title IX student matters; HR handles employee matters



SEVEN (REALLY EIGHT) ELEMENTS

OF AN EFFECTIVE COMPLIANCE PROGRAM

1 Structure & oversight

2 Policies & procedures

3 Training & communication

4 Reporting systems

5 Response & investigation

6 Enforcement & corrective action

7 Monitoring & auditing

8 Risk assessment

Source: the Federal Sentencing Guidelines' elements of an effective compliance program — apply each at the subject-matter level so any structure is defensible.



THE PANEL: THREE CAMPUSES

Centralized, decentralized, and hybrid in practice

1 · STRUCTURE

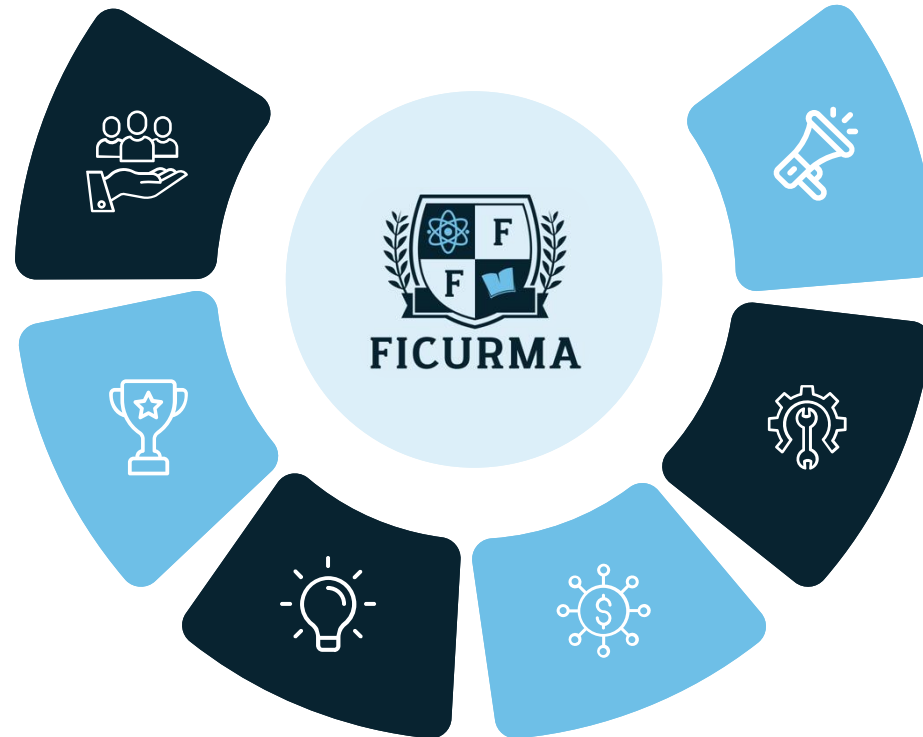
Who owns what, and where does each function report?

2 · COORDINATION

What keeps the offices talking to each other?

3 · HARD CASES

When one incident spans mandates, who runs point?



4 · LESSONS

A coordination breakdown you learned from.

5 · RESOURCING

Buy-in, budget, and the small-shop reality.

6 · LIGHTNING

The one change that helped coordination most.

Kelsey Kimball

Sr. Deputy Title IX Coordinator, Florida Tech

- **Leads civil-rights compliance at Florida Tech** — intake, assessment, and investigation of discrimination, harassment, and retaliation for students and employees.
- **Built out the EO function** — centralizing reporting and case management and bridging Title IX, HR, and Student Conduct.
- **Threat assessment** — chaired the University's CARE / Behavioral Assessment Team (Spring 2026), focused on early intervention and coordinated response.
- **5 years at Florida Tech** — holds a Master of Public Administration.



Matthew Cameron

Associate VP & Dean of Students, Barry University

- **Double Barry University alumnus** — B.S. in Criminology and M.S. in Higher Education Administration.
- **Leads Housing, Residence Life & Student Conduct** — providing overall leadership and direction for the department.
- **University Title IX Investigator** — serves on Barry's Title IX response team.



Blaze Bowers

AVP and Title IX Coordinator, Drexel

- **Regional Director at Grand River Solutions** — partners with schools, agencies, and nonprofits to assess needs and implement civil-rights and compliance solutions.
- **Cabinet-level higher-ed leader** — has served as Chief Student Affairs Officer, AVP for Student Affairs & Compliance, Title IX Coordinator, and Institutional Compliance Officer.
- **Previously at Lincoln Memorial University** — AVP for Academic & Student Support Services and Senior Title IX / Compliance Officer.
- **J.D. and university instructor** — has taught as adjunct faculty alongside his administrative roles.



COORDINATING ON CAMPUS — A TAKEAWAY PLAN

Six moves to align policy, process, and people across civil-rights compliance.

01 Audit & Map Policies

Chart responsible administrators, reporting methods, grievance paths and timelines, overlaps, conflicts, and minimum regulatory requirements.

02 Align & Deconflict

Unify policies where possible; state where each applies, what governs on dismissal, and how tandem investigations run.

03 Clarify Roles

Build an org chart and a detailed list of responsibilities so everyone knows who owns what.

04 One Front Door

Put all protected-status reporting in one clear place online, with a single cross-trained intake using shared forms and checklists.

05 Consistent Casework

Hold regular cross-functional assessment meetings, document determinations, and use case opening and closing checklists.

06 Centralize & Govern

Consolidate data for a campus-wide view of trends, and meet routinely to review compliance and drive improvement.



THE CLOSING TABLETOP

AT YOUR TABLE

Read the email on the next slide at your table (about 3 minutes). Then work the discussion questions on your handout together.

FORMAT

Groups of four or five. Pick someone to share one insight. Keep the framework in mind: a clear front door, an owner, and documented hand-offs.

ONE EMAIL, FIVE INBOXES

THE CLOSING TABLETOP

At 11:48 PM Sunday a parent emails the president and copies five offices: their first-year child, a fraternity pledge, was hospitalized after unreported hazing; forced into sexual, humiliating “challenges” by an older member who may also be a campus employee; exposed to drugs; and the organization is tied to antisemitic graffiti on campus. The parent asks who is in charge — and whether they must tell the story five times. (The full email is on your handout.)

1 · Who sees this first — one front door, or five? What has to happen in the first 24–72 hours?

2 · Name every matter and the law it triggers: hazing, sex-based harassment, drugs, Title VI vandalism, failure to notify, an employee-respondent.

3 · Who runs point so this stays one coordinated case? Weigh FERPA, the student’s reluctance, retaliation, and external reporting clocks.



THANK YOU



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