

CREATING A CULTURE OF REPORTING ON YOUR CAMPUS

Kate Legee

September 4, 2026

Grand River Solutions

ABOUT US

Vision

We exist to create safe and equitable work and educational environments.

Mission

To bring systemic change to how school districts and institutions of higher education address their Clery Act & Title IX obligations.

Core Values

- Responsive Partnership
- Innovation
- Accountability
- Transformation
- Integrity

Grand River Solutions



Kate Legee

Senior Solutions Specialist

Kate has more than 15 years of experience working with faculty, staff, and students in public and private higher education institutions. Kate has a background in violence prevention, student conduct, employment discrimination, Title IX & EEO, crisis response, and Behavioral Intervention Team case management and protocols. Kate holds an MS in Human Resources Management from Temple University, a MA in Counseling Psychology from Immaculata University, and a Bachelors Degree from Millersville University. She is ABD in Criminology and Justice Studies. Kate lives in New Hampshire with her husband, two dogs, and a fridge filled with cheese.

Grand River Solutions

AGENDA

- Identifying employees with Reporting Obligations
- Confidential Employees
- Cultivating a Culture of Reporting
- Managing Pushback

Grand River Solutions

WHERE WERE WE? WHERE ARE WE NOW?

01

Grand River Solutions

Official With Authority

Mandatory Reporter

REQUIRED

Turn them in

Because you Must

RESPONSIBLE EMPLOYEE

OR ELSE



Grand River Solutions

GRAND RIVER | SOLUTIONS

GRAND RIVER | SOLUTIONS

History Of Employee Reporting Obligations (1)

- **1977 Guidance**: Where it Started
  - A school is liable for hostile environment harassment only after the school is **ON NOTICE** and then fails to take immediate and appropriate corrective action.
  - That notice had to be delivered to the appropriate school official.
- **1998**: *Gebser v. Lago Vista Independent School District* (U.S. Supreme Court)
  - A school could be liable for money damages only when there is **actual notice** to a **RESPONSIBLE EMPLOYEE**: the school official who has the authority to address the alleged discrimination and take corrective action.
- **2001 Guidance**: *[In] situations involving . . . harassment . . ., a school will be in violation of the Title IX regulations if the school "has notice" of a sexually hostile environment and fails to take immediate and effective corrective action.*
  - A school has notice if a responsible employee "knew, **or in the exercise of reasonable care should have known**," about the harassment.

Grand River Solutions

History Of Employee Reporting Obligations(2)

- **2011 Dear Colleague Letter:** Suggested that all employees could be a responsible employee, but then also listed several types of employees as those likely to receive reports.
- **2014 Q&A Guidance:** Whether an employee is a responsible employee or **whether it would be reasonable** for a student to believe the employee is, even if the employee is not, will vary depending on factors such as the **age and education level of the student, the type of position held by the employee, and school practices and procedures**, both formal and informal. (see 33–34, n.74)
- **2017 Rescission of the above Guidance Doc's:** The 2011 DCL and 2014 Q&A were pulled back, and we returned to 2001 Guidance.

Grand River Solutions



2020



§106.30 Definitions:

- Abandons the term "responsible employee."
- "Actual notice" means notice of sexual harassment or allegations of sexual harassment to a recipient's Title IX Coordinator or any official of the recipient who has authority to institute corrective measures on behalf of the recipient—these people are "officials with authority"
- No more "knew or should have known"
- *The mere ability or obligation to report sexual harassment or to inform a student about how to report sexual harassment, or having been trained to do so*, does not mean the school is on notice.

Grand River Solutions

Where Are We Now?

As of 2020 (and today), who must report sexual harassment they learn about or observe to the Title IX Coordinator?

- **K12:** every employee
- **Other recipients:** employees with the authority to institute corrective measures on behalf of the recipient



Grand River Solutions

IDENTIFYING EMPLOYEES WITH REPORTING OBLIGATIONS

02

Grand River Solutions

WHO IS REQUIRED TO REPORT ON YOUR CAMPUS?

Tell us in the chat!

(IE all non-confidential employees, etc)



Grand River Solutions

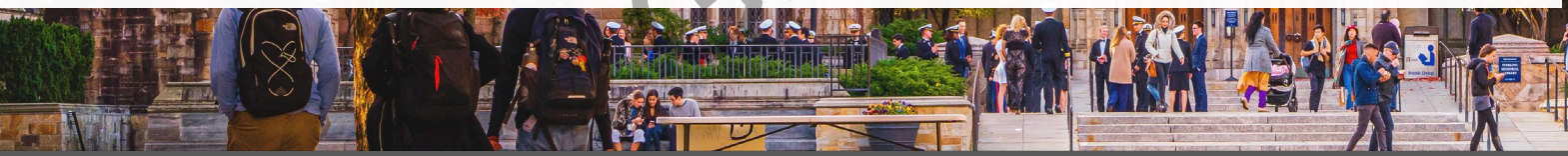
1. WHO should be required/asked to forward what they know to the Title IX office?

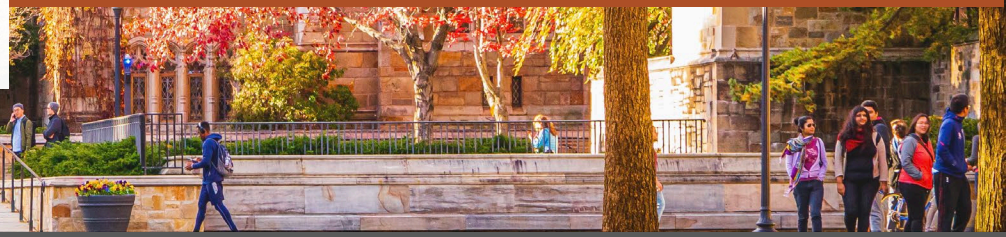
2. Why?

3. How do you want employees to handle this responsibility?

4. Does it matter if they are confidential employees? Let's discuss.

HOW TO DECIDE?
CONSIDERATIONS TO CONSIDER.





Grand River Solutions

Reminder:

As of 2020 (and today), who must report sexual harassment they learn about or observe to the Title IX Coordinator, initiating the required response?

- **K12:** every employee
- **Other recipients:** employees with the authority to institute corrective measures on behalf of the recipient



Grand River Solutions

What About Student Employees?

May be an official with authority **while they are fulfilling their employment responsibilities**, but not when solely as a student



Grand River Solutions

CONFIDENTIAL EMPLOYEES

03

Grand River Solutions

What about Confidential Employees?

Consider this for confidential employees:

For students who disclose sexual harassment, confidential employees *can* provide information on resources, including the **Title IX Coordinator's contact information.**



Reminder, Confidential employees need to have privilege under state law allowing them to keep information confidential."

Grand River Solutions

WHAT ABOUT PREGNANCY?

- Not required, but you *could* instruct confidential employees to share the following when a student discloses they are pregnant or experiencing pregnancy related conditions:

- 1.) Title IX Coordinator Contact Info
- 2.) An explanation that the Title IX Coordinator can coordinate reasonable modifications and provide that support.

Reminder, this is NOT a reporting requirement!



Grand River Solutions

ENGAGING YOUR CONFIDENTIAL EMPLOYEES

- Annual training
- Establishing a clear partnership by building trust with your confidential employees
- **How have you established positive relationships with your confidential employees?**



Grand River Solutions

Fostering A Positive Reporting Climate On Your Campus

04

Grand River Solutions

ASSESSING YOUR CURRENT CAMPUS CULTURE

- What are you doing well? Where are there opportunities for improvement?
- Ask for input from your key stakeholders.
- Assessment: Do most employees report? Is there consistent pushback to reporting? What else are you hearing?
- Acquiring that feedback:
  - Listening sessions
  - Surveys



Grand River Solutions

ENGAGING LEADERSHIP

- How can you engage leadership? How can you get their buy-in?
  - Messaging from campus leadership
  - Reinforcement coming from "top down"
  - Identifying other partners who have buy-in in your community (high social capital)
  - Begin by identifying at least one campus leader
- Norming your campus
  - Sharing data
  - Doing "departmental road shows"
    - Ask me anything sessions

Grand River Solutions

DON'T FORGET YOUR STATE LAWS



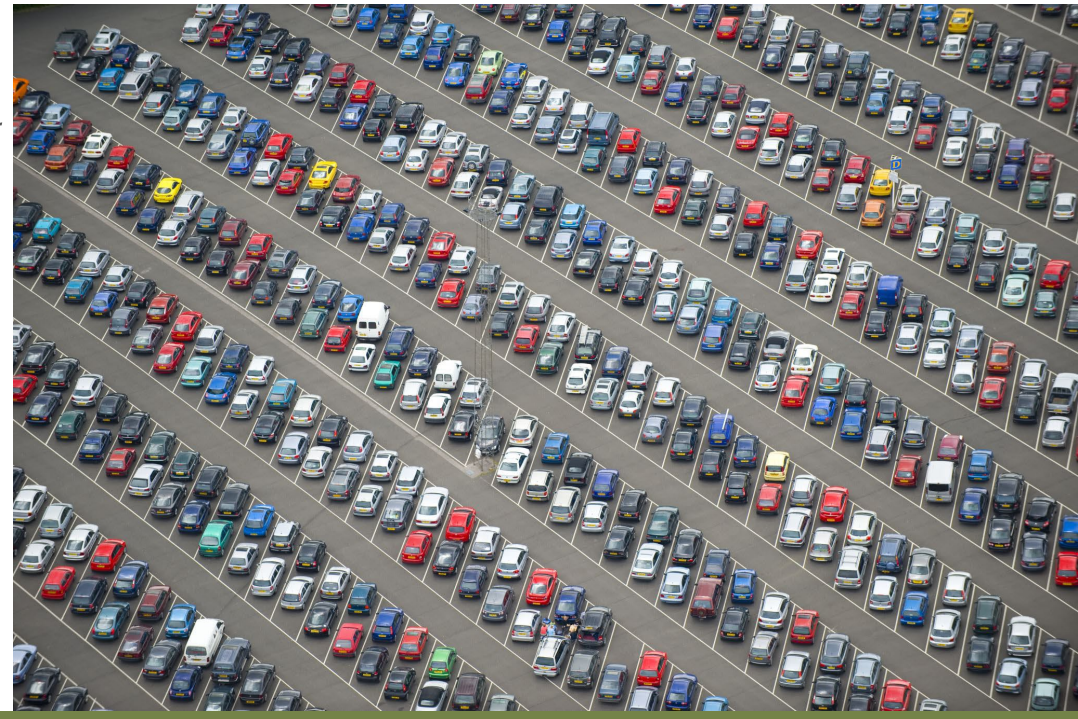
Grand River Solutions

Now What?

A MANAGER IS RELUCTANT TO REPORT ON BEHALF OF AN EMPLOYEE THAT WORKS IN THEIR DEPARTMENT. THEY SENT YOU THE FOLLOWING EMAIL ABOUT AN HOUR AGO AND IS NOW OUTSIDE YOUR OFFICE REQUESTING TO SPEAK WITH YOU.

"My name is Alex Jones, and I am the team manager in the Marketing Department. One of my employees confided in me yesterday that they were stalked last week by another employee in the parking lot. They explicitly asked me not to report the incident or share their name, and I want to respect their privacy. Besides, I know the Title IX Office never does anything about concerns that are reported to them anyway.

I think I know who the other employee is and one of my buddies is the department chair in their department. Can you give me the name of our campus mediator so we can resolve this in a friendly way?"

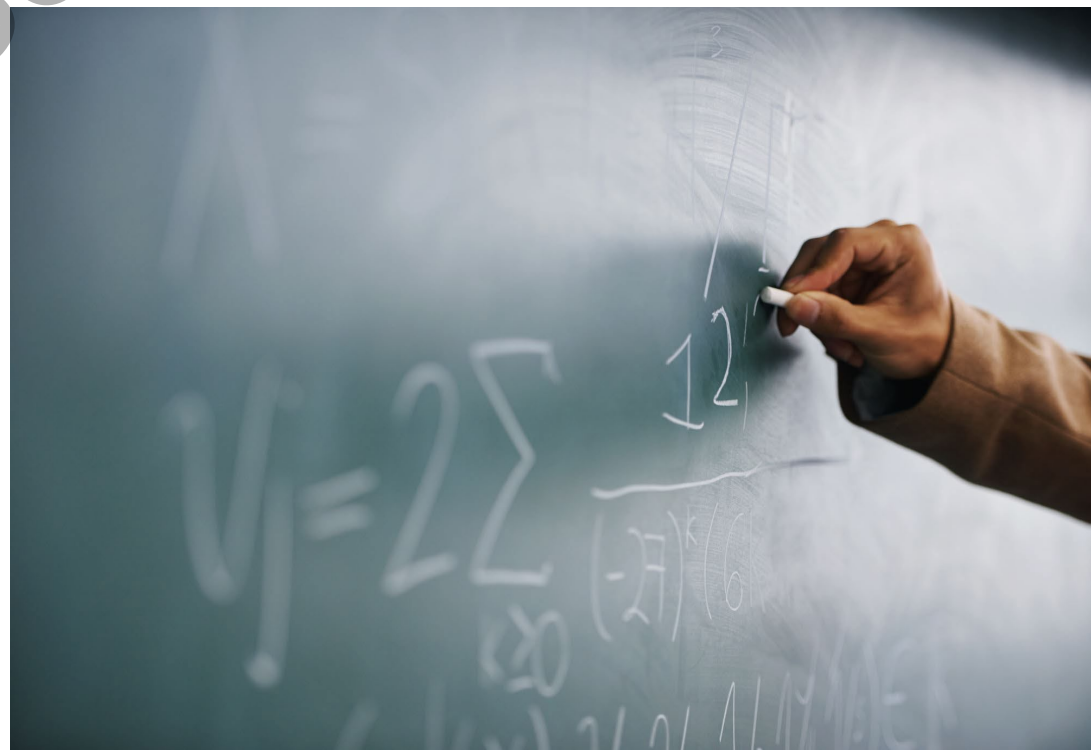


Grand River Solutions

Now What?

You received a 3rd party report that a staff member learned of a sexual assault last week and did not report. After sending an email to them to check in, you receive the following response:

"Being forced to tell you this student's name is a violation of my rights and personal views. As an advocate for survivors, which is what you should be, I believe students should be able to choose whether or not they want to report to you. I will not strip survivors of their autonomy like you do. Furthermore, the student specifically asked me not to say anything, because she trusts me, not the administration. I will always protect survivors on our campus."



Grand River Solutions

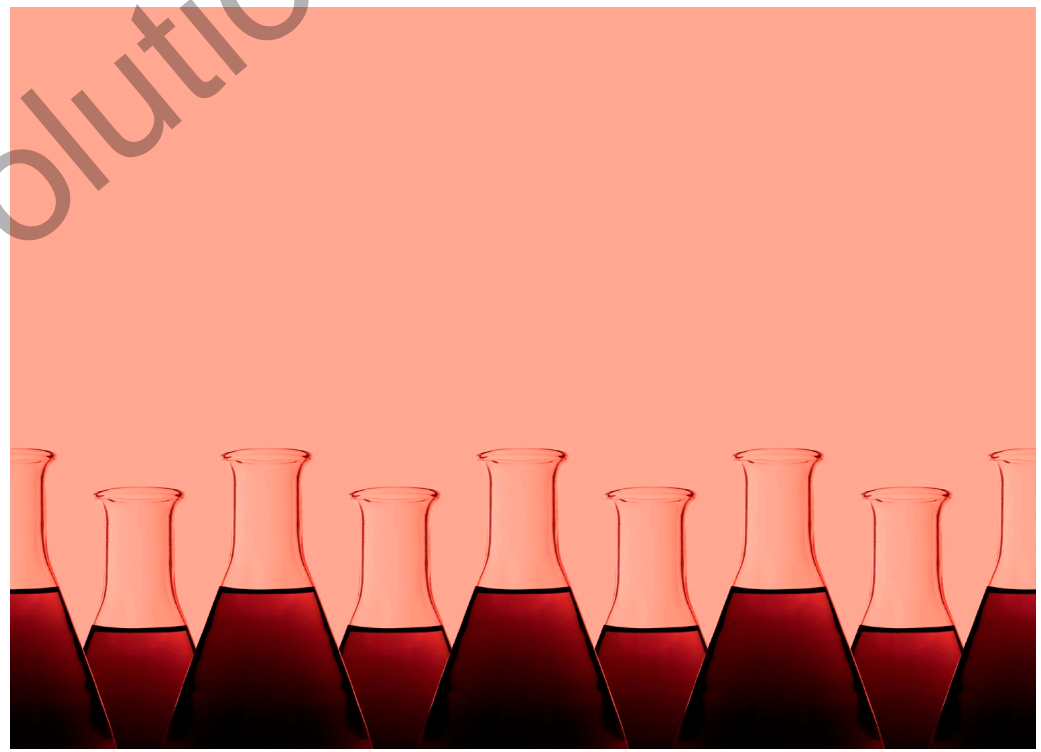
NOW WHAT?

You receive an email from another employee on campus. What next?

"This is Jordan over in the Chemistry Department. My friend is an admin assistant in another department on campus. She has been experiencing some unwanted comments and attention by a professor in her department.

She is too scared to make a report about another employee because she knows he will retaliate against her. She is a single mom and needs this job.

Everyone knows this guy is jerk, but no one wants to report it. Everyone knows he won't change and he is union protected and can't get fired. What should I do?"



Grand River Solutions

WHY IS REPORTING A GOOD THING?

- We cannot respond or protect our campus when we don't have the information.
- Ensuring the complainant is getting the support they need and understands their rights and options.
- The complainant won't need to share their story multiple times (trauma-informed)
- Allowing Title IX office to do the work instead of the reporter.
- Interrupting and preventing harm contributes to a safer campus community.
- What else?

Grand River Solutions

Resistance To Reporting: A Primer

Myth	Response
• It feels like reporting the victim	• It's actually a referral to someone who can provide information and assistance
• Perception: it violates trust	• Remembering boundaries
• Employees who are misinformed about process	• Ensures outreach, resources, options, and rights are provided
• A false understanding of "agency"	• True agency requires an informed decision

Grand River Solutions



To Reduce Resistance, Frame it Differently

Get it off your plate, over to the right office

You don't want/need more responsibility to solve

The person receiving the outreach can ignore it, delete it

Make a required referral

Grand River Solutions

Take-aways

Define your goals

Define roles and expectations

Train

Communicate

Rinse and repeat. And then one more time for good measure.

Grand River Solutions



Finale

This is not a concept to fear – this is simply a mechanism that helps you to do your best work, and helps keep a campus free from harassment and discrimination.

Let’s not endorse the idea of driving a request for help underground.

We cannot address sexual harassment and discrimination if we don’t know about it. Let’s normalize the idea that sharing information and allowing the coordinator to do their job is a good thing.

Grand River Solutions

THE RIVER CONNECT



THE RIVER CONNECT is a virtual community of experts and colleagues gathered together to help each other process the complexities of the work.

Grand River Solutions



Let Our Team Support The Good Work You And Your Team Are Doing.

- Delegated Roles
- Investigations
- Hearings & Appeals
- Alternative Resolutions
- Program Review
- Policy & Procedures
- Consulting & Coaching

Grand River Solutions

TRAINING AND TRAINING MEMBERSHIP

Please check out our wide selection of trainings and learn about our new unlimited training membership. ***Unlimited open training access for your whole campus, one annual fee.***



Explore Training

Grand River Solutions

CASE MANAGEMENT SOFTWARE



Grand River Solutions

Designed for you, by people like you

We are experts and practitioners working in response and resolution for discrimination, harassment, & equity concerns.

Case Tracker allows you to:

- track and manage your cases
- communicate with campus stakeholders without compromising case privacy, and
- provide parties with the ability to follow the status of their case

Schedule a Demo

GRAND RIVER | SOLUTIONS

Stetson Law & Grand River Solutions
are pleased to present

Free Speech & Title VI SYMPOSIUM

October 27 & 28, 2026
Las Vegas, Nevada

This two-day professional development experience brings together nationally recognized subject matter experts and working practitioners to explore two of the most consequential legal and policy issues confronting colleges and universities today. Join us!



Grand River Solutions

©Grand River Solutions, Inc., 2026. Copyrighted material. Attendees who are required to post training materials in compliance with applicable federal law have express permission to do so. These training materials are intended for use by licensees only. Use of this material for any other reason without permission is prohibited.

Grand River Solutions