

2024

3rd Annual Compliance Awareness Survey Report



GOVSTATE

Modified: December 10, 2024



The Office of Compliance and Ethics is pleased to announce the results of the 3rd Annual Compliance Awareness Survey, issued in Calendar Year 2023 (the “2023 Survey”).

The 2023 Survey reflects the views of 437 employees who participated. The response rate of 31.9% was slightly lower than prior years but still statistically significant. We appreciate the time and effort of all those who chose to respond and encourage everyone to weigh in this year. The Calendar Year 2024 compliance survey was run in October and November, and the results are being tabulated and analyzed now.

The annual compliance survey plays a vital role in the University’s compliance program. In her book, *Higher Education Compliance: Blueprint for Success*, Judith W. Spain, J.D., CCEP, explains that, within the world of higher education, “[c]ompliance is more about mindset and culture. It is the institution-wide decision that, if a law exists, the institution will strive to ensure compliance with it—not only the letter of the law but also with the spirit of the law.” Ms. Spain’s recommendations for creating an institution-wide “buy-in” for any compliance initiative include the design and implementation of a “compliance awareness survey”: “A compliance awareness survey should be done annually to assess the awareness of the initiative by the campus community. [. . .] This survey will serve as your benchmark for increased awareness of the compliance initiative[.]”²

Therefore, GovState’s Office of Compliance and Ethics (https://www.govst.edu/Compliance_Ethics/) issues an annual compliance survey to gauge employees’ current understanding of individual obligations, identify potential areas of concern, and guide future training offerings and policy decisions.

SUMMARY OF SURVEY RESULTS

The 2023 Survey was composed of nineteen (19) main questions, several of which had follow-up questions, depending on an employee’s answer. The first nine (9) questions (plus related follow-up questions) have been included since the inaugural survey three years ago (in Calendar Year 2021) and provide a benchmark of employee perceptions and awareness over time (“Benchmark Questions”).

The next eight (8) questions were repeats of the previous year’s survey (from Calendar Year 2022) and sought feedback on employee perceptions of the culture of civility at GovState, thoughts on compliance-related trainings, and knowledge of various compliance topics.

The one (1) new question for 2023 was also related to employee knowledge of the federal Clery Act. Measuring employee awareness and knowledge helps the Office of Compliance and Ethics set priorities for future training, communications, and policy action. The aggregated responses to the 2023 Survey are attached hereto as **EXHIBIT 1**.

GO TO EXHIBIT 1

¹ Spain, Judith W., *Higher Education Compliance: Blueprint for Success*, at 3 (MacArthur Publishing House, 2018).

² *Ibid.*, at 109.

Questions re: Ethics and Compliance Awareness

Regarding the Benchmark Questions reflected in Exhibit 1 (shown as Q1-Q12, which include the nine Benchmark Questions and all associated follow-up questions), these questions were designed to gauge employee's perception of the GovState working environment with respect to ethics and compliance and general civility. Notably, the vast majority, or 80.92%, agreed or strongly agreed with the statement "*Our institution fosters a culture of compliance.*" Fewer than 10% (6.67%) disagreed or strongly disagreed with that statement. The number of employees who agreed or strongly agreed with that statement hardly changed year-over-year.

There was a similar pattern with Q10: "*Do you believe that most people working for GSU act in an ethical and compliant way?*" Over 90% (91.13%) replied "yes" to that statement always, nearly always, or most of the time. The number of participants who responded "Yes, always or nearly always" fell by nearly three percentage points, but that change was off set with an increase of "Yes, most of the time" responses.

Regarding Q11, "*Do you believe that GSU's Directors, Vice Presidents and President exhibit ethical and compliant behavior,*" 95.46% answered affirmatively. For that question, however, the number of "rarely" responses grew from 0.78% in 2021, to 1.96% in 2022, to 3.54% in 2023 (please see **EXHIBIT 2** for a comparison of the aggregate responses from Calendar Years 2021, 2022, and 2023).

GO TO EXHIBIT 2

Of concern in the 2023 Survey data, over a third of respondents (35.49%) answered "no" to Q2: "*Do you think ethics and compliance are a strong focus at GSU.*" And nearly a fifth (17.14%) said that they had observed possible unethical behavior or noncompliance with a law or GovState policy within the last 12 months in response to Q3. Of those who had observed such conduct, over half (56.41%) stated that they did not attempt to report it in response to Q4. The vast majority of those who stated they did not report such conduct stated that they did not believe anything would be done if they made such a report (71.43%). In response to Q8, nearly a third of respondents (30.77%) felt minimally or not confident at all that they would be protected from retaliation if they made a complaint. Over a fifth (21.10%) of all respondents said they did not know how to make a report of noncompliance.

Questions re: Civility

In response to Q13, 64.11% of respondents agreed with the statement "*I believe that the GSU faculty, staff, and administration treat all students with dignity and respect.*"

In response to Q15, 86.87% of respondents agreed with the statement "*I trust my supervisor to support me in my role and follow through on promises and commitments.*"

Questions re Training and Knowledge of Laws, Policies and Personal Obligations

Q17 was designed to gauge supervisors' thoughts on training support, and Q20-Q24 were designed to gauge employees' knowledge of various laws and policies, their understanding of personal obligations with respect to ethics and compliance, and their need for additional training.

In response to Q17, nearly a quarter of those manager-respondents (24.79%) said they did not receive adequate training to successfully manage and support the employees they supervised. Approximately 10% (10.38%) of all respondents said they did not know where to find copies of GovState's policies (Q20) and another 25.45% said that the online library of policies was not easy to navigate (Q21).

Regarding FERPA obligations (Q22), only 5.33% said that they were uncomfortable or somewhat uncomfortable with knowing their responsibilities. However, 13.44% of respondents did not know or were unsure what to do if they see or heard about Title IX misconduct (Q23), and another 32.98% did not know or were unsure what to do pursuant to the Clery Act if they saw or heard about a crime being committed on campus (Q24).

NEXT STEPS: ACTING ON THE RESULTS

The responses to the 2023 Survey questions are being analyzed to determine what steps are needed to address areas of concern, particularly around (i) noncompliance with reporting obligations; (ii) increasing knowledge of Clery Act and Title IX personal obligations; (iii) management training; and (iv) awareness of GovState policies. This information has been shared with the President and President's Cabinet and now, at the request of certain faculty, with the campus community at large.

Some of the areas of concern may be improved as the Compliance function matures at GovState and pursues initiatives currently underway. For example, this year, the month of October was newly designated "Compliance Month" and weekly newsletters were sent to all employees on various topics.

Also in October, the GovState Board of Trustees passed a comprehensive regulation regarding Ethics and Compliance, which will be the subject of future communications.

To meet a new federal mandate, the Office of Compliance and Ethics also purchased a new learning management system to administer newly required Title IX training, which will hopefully alleviate concerns in that area. It remains to be seen whether these efforts will result in increased visibility into compliance by the campus.

Other issues may benefit from stronger communication than currently used. For example, various types of management training are available via the Human Resources Department's S.E.E.D.S. (**S**ecuring **E**xcellence through **E**mployee **D**evelopment and **S**upport) Professional Development Program and the new learning management system. We need to ensure that employees know how to access this information. It appears that information regarding how to make a report of noncompliance may be getting lost when presented via the annual Ethics and Harassment Training; more frequent and more accessible messaging of how to file a complaint may be in order.

Other areas may require the rollout of new types of training and communication. For example, the Office of General Counsel is working with the Human Resources Department to develop additional management training concerning the rights and responsibilities of Civil Service employees and how best to support them.

The Office of General Counsel also is working on developing training regarding the Clery Act and our personal reporting obligations under that federal law.

CONCLUSION

The Annual Compliance Awareness Survey is a critical tool for the Office of Compliance and Ethics, and other University offices and departments, to identify areas requiring attention going forward. The results help drive the agenda for training, communications, and policy.

Campus participation in the annual employee survey is essential to the survey's success. Campus feedback on the results and/or potential action items is invited as well.



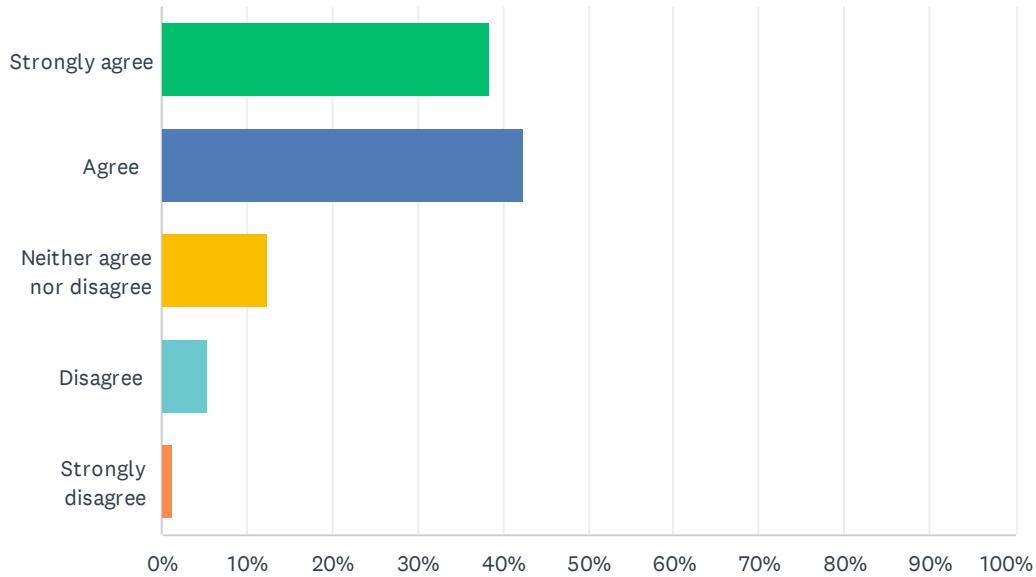


EXHIBIT 1



Q1 Please indicate your level of agreement with the following statement:
 “Our institution fosters a culture of compliance.”

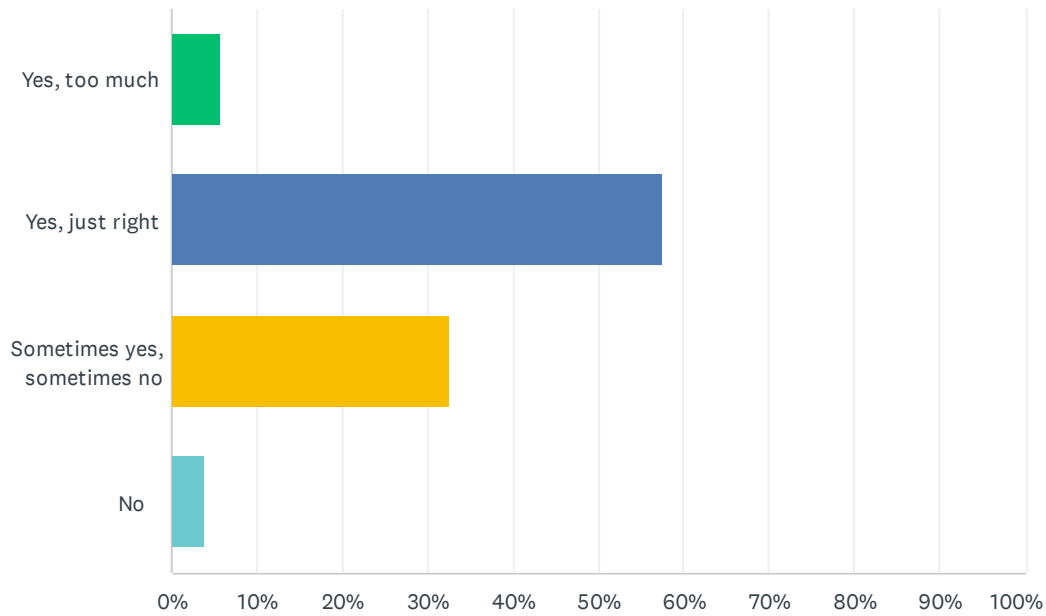
Answered: 435 Skipped: 2



ANSWER CHOICES	RESPONSES	
Strongly agree	38.39%	167
Agree	42.53%	185
Neither agree nor disagree	12.41%	54
Disagree	5.29%	23
Strongly disagree	1.38%	6
TOTAL		435

Q2 Do you think that compliance and ethics are a strong focus at GSU?

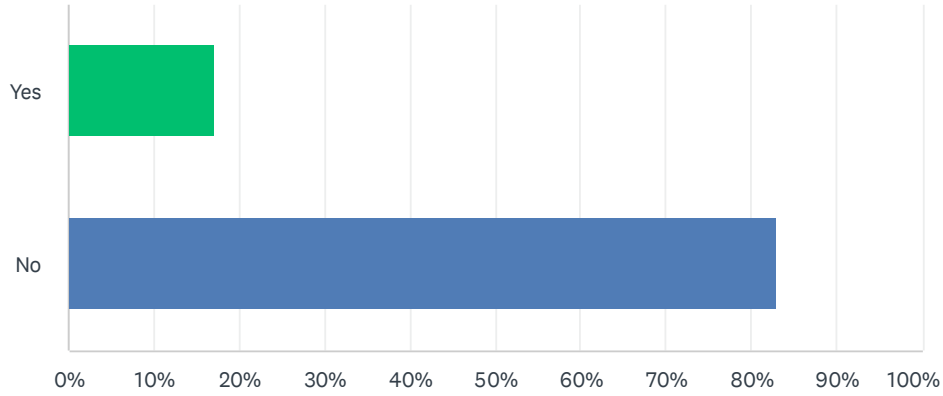
Answered: 434 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes, too much	5.76%	25
Yes, just right	57.60%	250
Sometimes yes, sometimes no	32.72%	142
No	3.92%	17
TOTAL		434

Q3 Have you observed possible unethical behavior or noncompliance with any Laws or GSU Policies within the last twelve months?

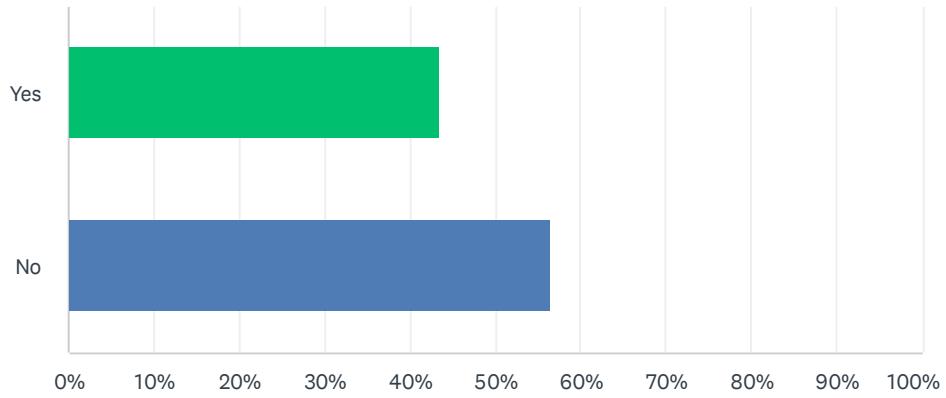
Answered: 426 Skipped: 11



ANSWER CHOICES	RESPONSES	
Yes	17.14%	73
No	82.86%	353
TOTAL		426

Q4 If yes, did you attempt to report it?

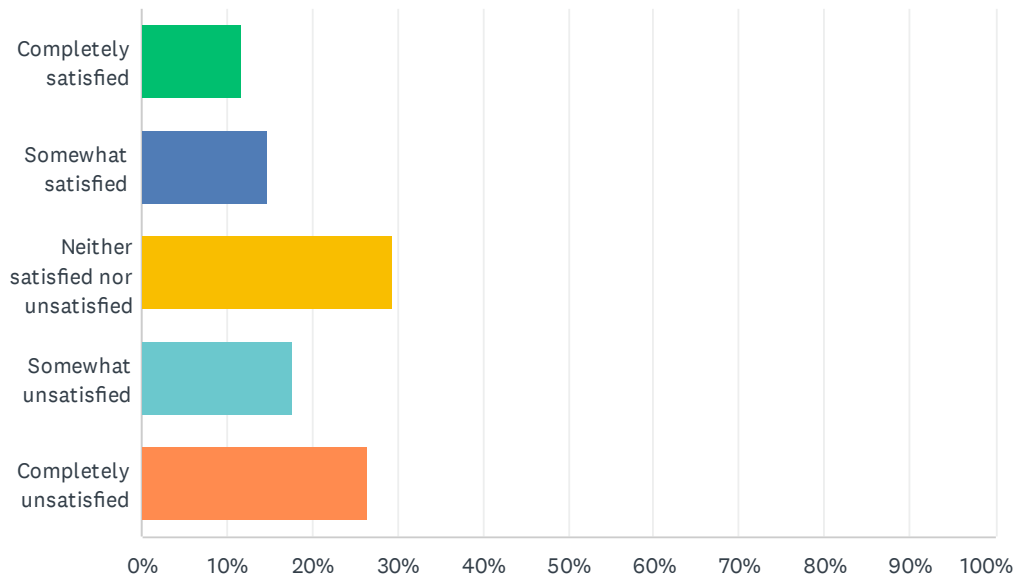
Answered: 78 Skipped: 359



ANSWER CHOICES	RESPONSES	
Yes	43.59%	34
No	56.41%	44
TOTAL		78

Q5 If yes, how satisfied were you with the response to your report?

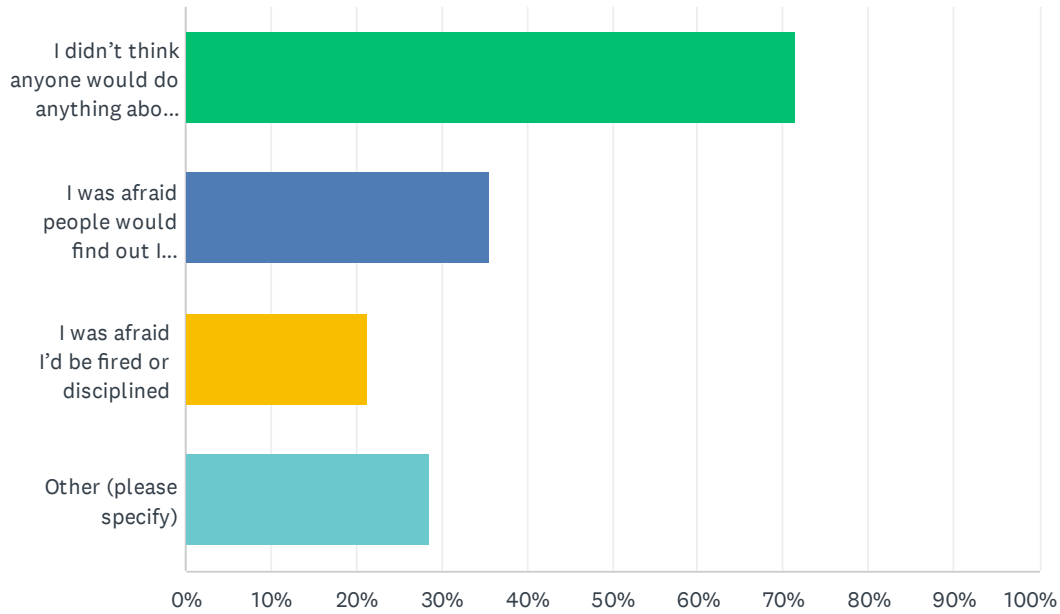
Answered: 34 Skipped: 403



ANSWER CHOICES	RESPONSES	
Completely satisfied	11.76%	4
Somewhat satisfied	14.71%	5
Neither satisfied nor unsatisfied	29.41%	10
Somewhat unsatisfied	17.65%	6
Completely unsatisfied	26.47%	9
TOTAL		34

Q6 If not, why not? (check all that apply and/or fill in the answer below)

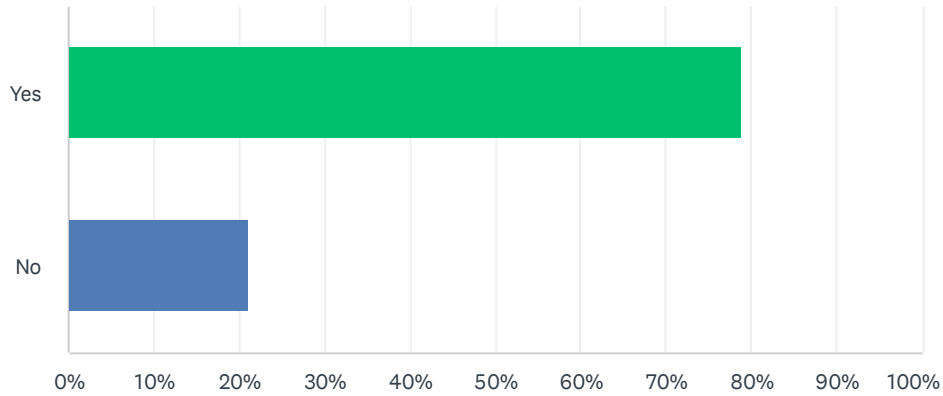
Answered: 42 Skipped: 395



ANSWER CHOICES	RESPONSES	
I didn't think anyone would do anything about it	71.43%	30
I was afraid people would find out I complained	35.71%	15
I was afraid I'd be fired or disciplined	21.43%	9
Other (please specify)	28.57%	12
Total Respondents: 42		

Q7 Do you know how to submit a report regarding possible unethical behavior or noncompliance with Laws or GSU Policies?

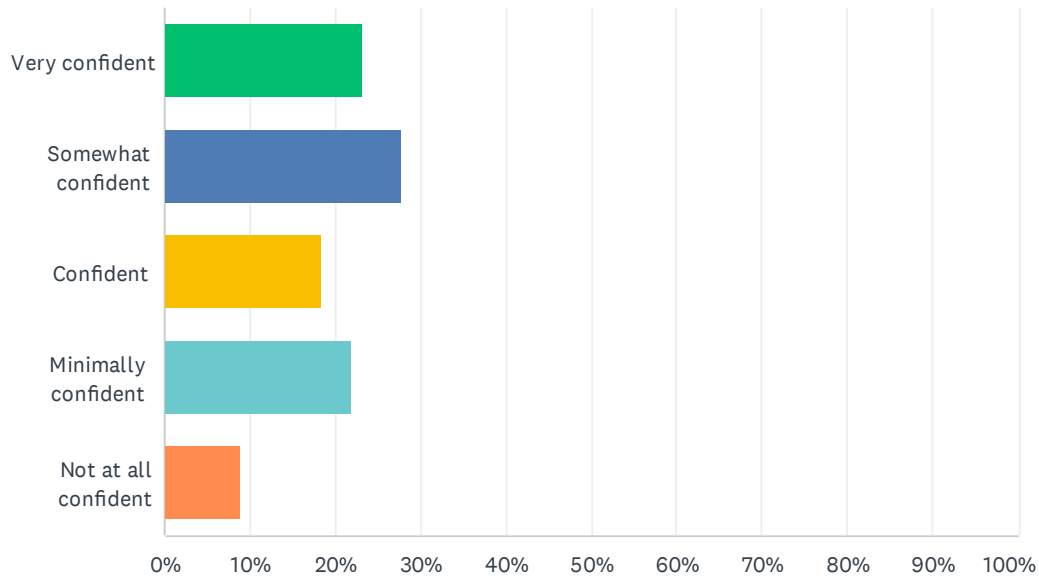
Answered: 417 Skipped: 20



ANSWER CHOICES	RESPONSES	
Yes	78.90%	329
No	21.10%	88
TOTAL		417

Q8 How confident are you that you would be protected from retaliation, retribution, or harassment if you reported possible unethical behavior or noncompliance with any Laws or GSU Policies?

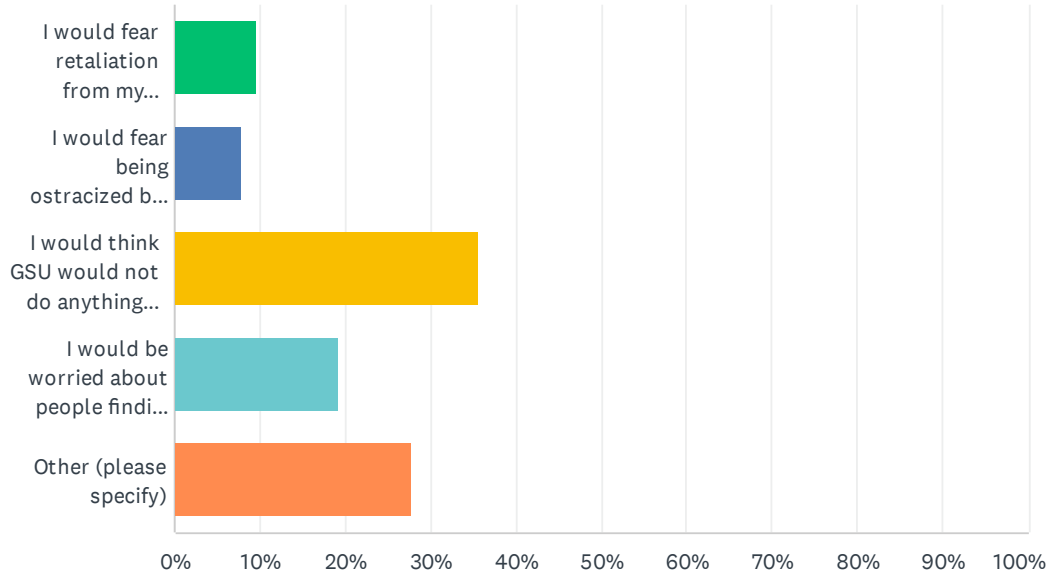
Answered: 416 Skipped: 21



ANSWER CHOICES	RESPONSES
Very confident	23.32% 97
Somewhat confident	27.64% 115
Confident	18.27% 76
Minimally confident	21.88% 91
Not at all confident	8.89% 37
TOTAL	416

Q9 If you saw possible unethical behavior, noncompliance, or other misconduct and chose not to report it, what would be the most likely reason?

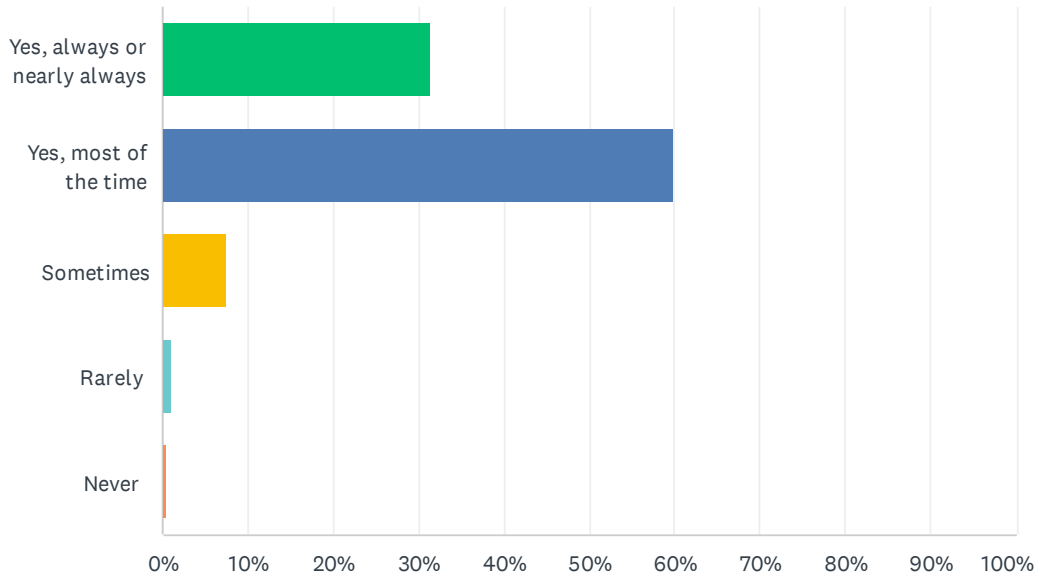
Answered: 396 Skipped: 41



ANSWER CHOICES	RESPONSES	
I would fear retaliation from my supervisor	9.60%	38
I would fear being ostracized by my peers	7.83%	31
I would think GSU would not do anything about it	35.61%	141
I would be worried about people finding out that I reported the incident	19.19%	76
Other (please specify)	27.78%	110
TOTAL		396

Q10 Do you believe that most people working for GSU act in an ethical and compliant way?

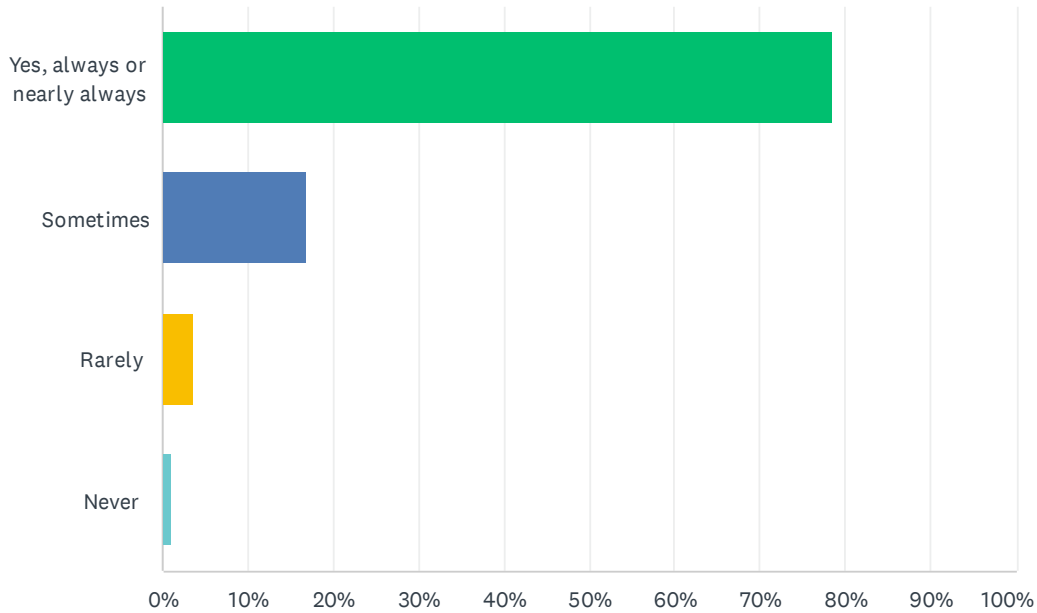
Answered: 406 Skipped: 31



ANSWER CHOICES	RESPONSES	
Yes, always or nearly always	31.28%	127
Yes, most of the time	59.85%	243
Sometimes	7.39%	30
Rarely	0.99%	4
Never	0.49%	2
TOTAL		406

Q11 Do you believe that GSU's Directors, Vice Presidents and President exhibit ethical and compliant behavior?

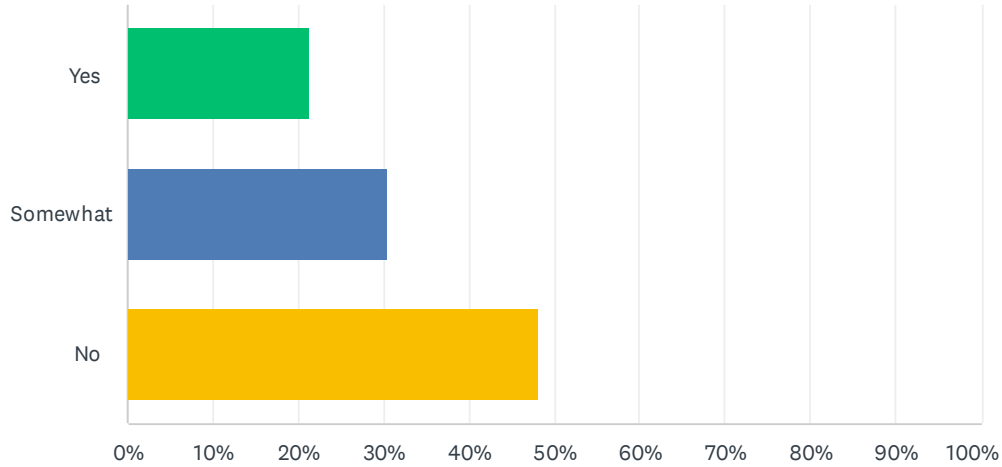
Answered: 396 Skipped: 41



ANSWER CHOICES	RESPONSES	
Yes, always or nearly always	78.54%	311
Sometimes	16.92%	67
Rarely	3.54%	14
Never	1.01%	4
TOTAL		396

Q12 Do you think that high performers can get away with more than low performers when it comes to ethical and compliant behavior?

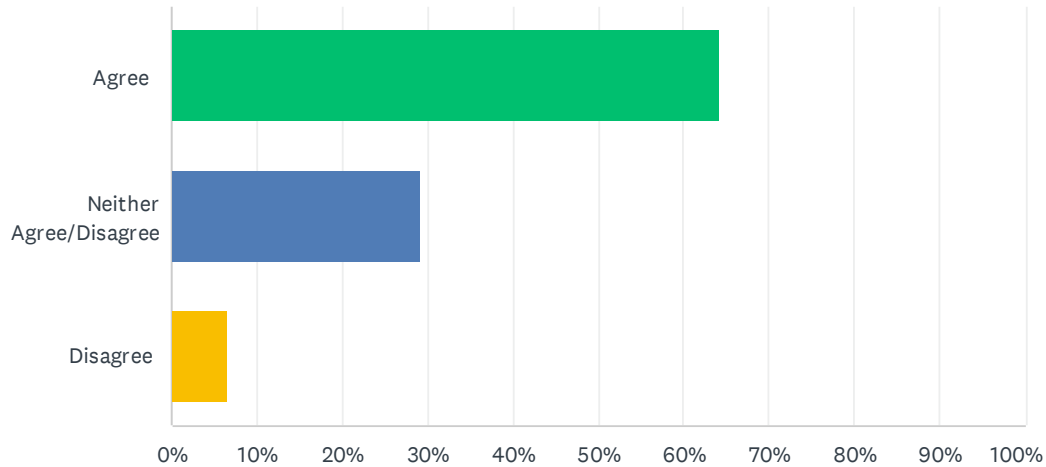
Answered: 399 Skipped: 38



ANSWER CHOICES	RESPONSES	
Yes	21.30%	85
Somewhat	30.58%	122
No	48.12%	192
TOTAL		399

Q13 Agree or Disagree: “I believe that the GSU faculty, staff, and administration treat all GSU students with dignity and respect.”

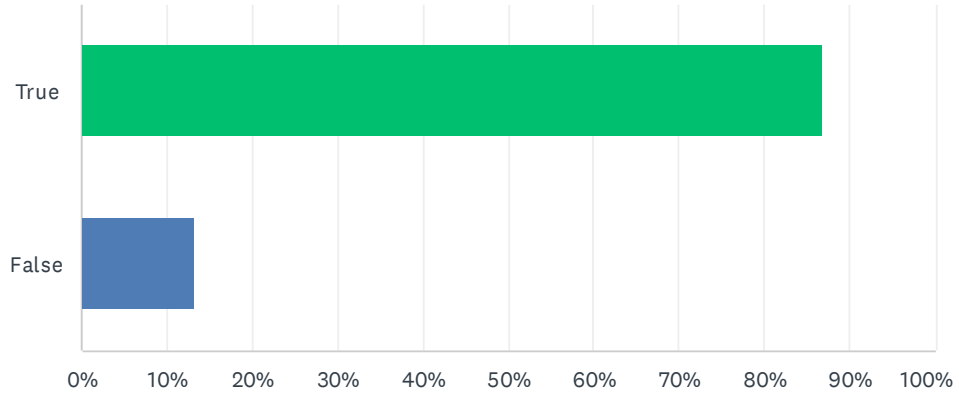
Answered: 404 Skipped: 33



ANSWER CHOICES	RESPONSES	
Agree	64.11%	259
Neither Agree/Disagree	29.21%	118
Disagree	6.68%	27
TOTAL		404

Q15 True or False: “I trust my supervisor to support me in my role and follow through on promises and commitments.”

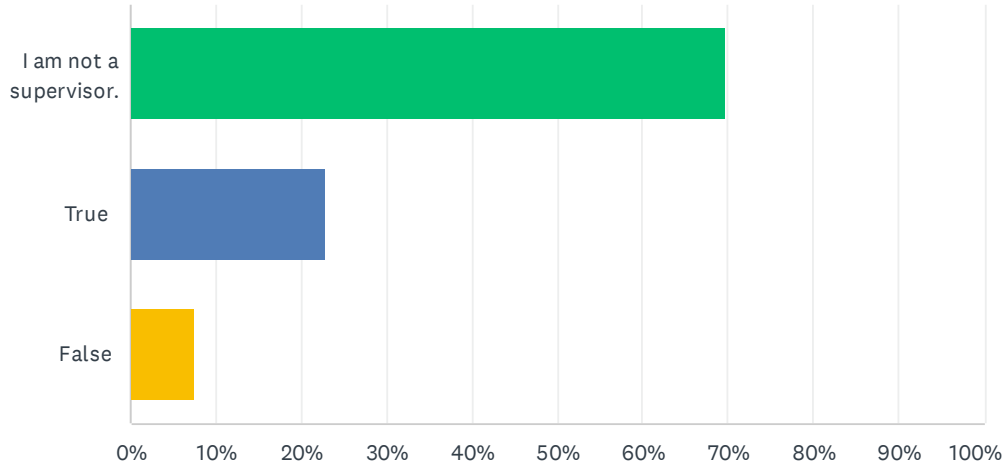
Answered: 396 Skipped: 41



ANSWER CHOICES	RESPONSES	
True	86.87%	344
False	13.13%	52
TOTAL		396

Q17 True or False: “As a supervisor, I have received adequate training to successfully manage and support the employees I supervise.”

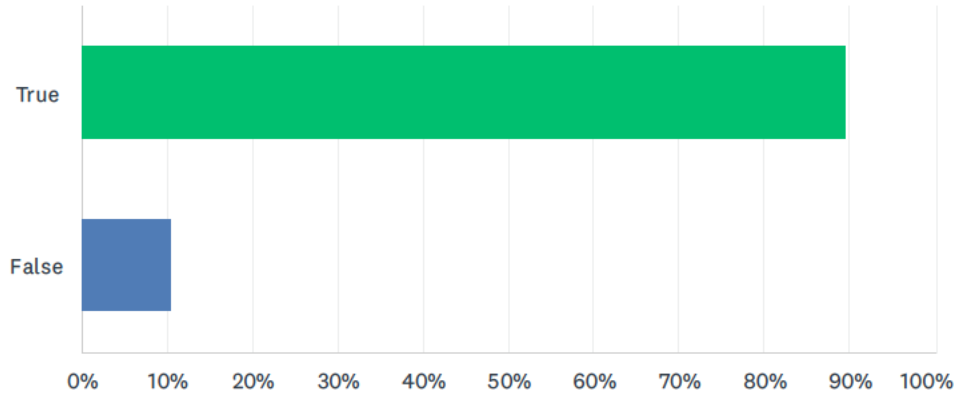
Answered: 400 Skipped: 37



ANSWER CHOICES	RESPONSES	
I am not a supervisor.	69.75%	279
True	22.75%	91
False	7.50%	30
TOTAL		400

Q20 True or False: "I know how and where to find copies of the GSU Policies."

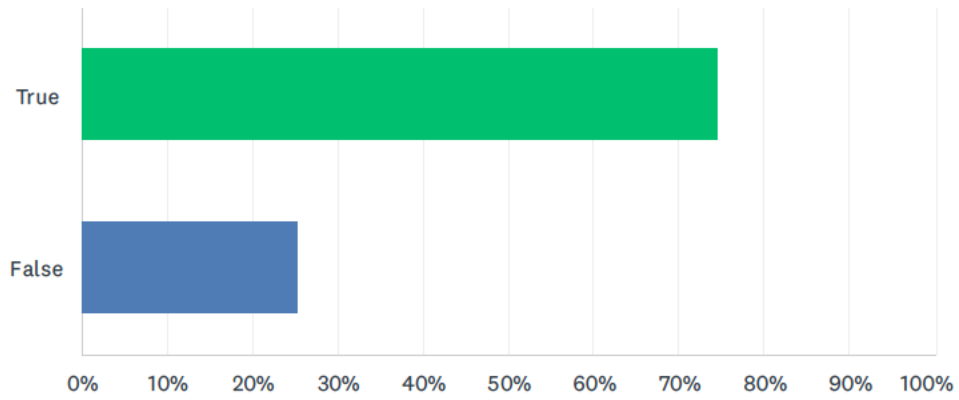
Answered: 395 Skipped: 42



ANSWER CHOICES	RESPONSES	
True	89.62%	354
False	10.38%	41
TOTAL		395

Q21 True or False: “The online library of GSU Policies is easy to navigate.”

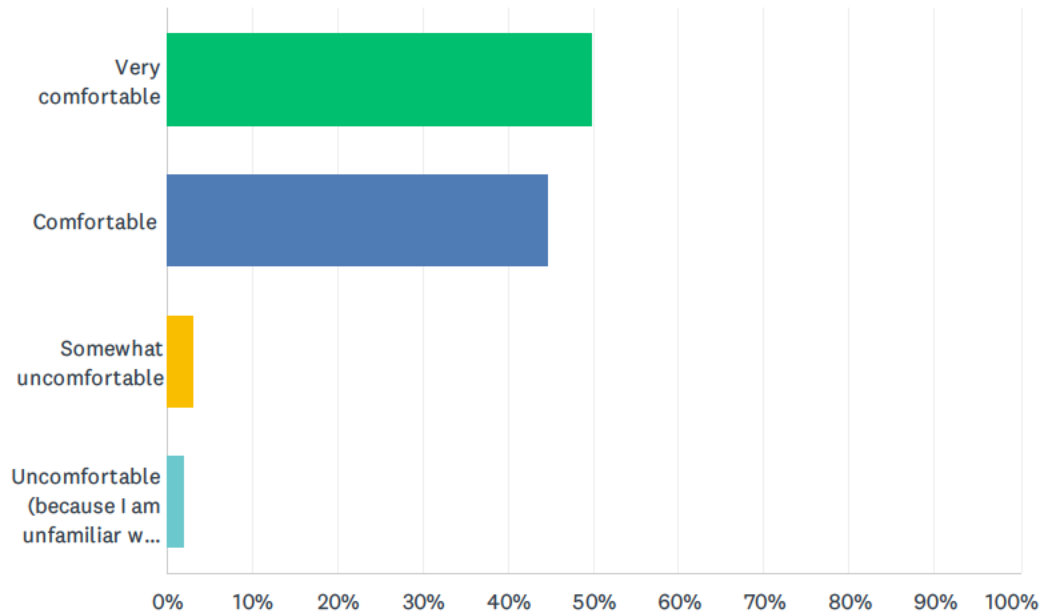
Answered: 385 Skipped: 52



ANSWER CHOICES	RESPONSES	
True	74.55%	287
False	25.45%	98
TOTAL		385

Q22 How comfortable are you that you know your responsibilities under the federal Family Educational Rights and Privacy Act (FERPA)?

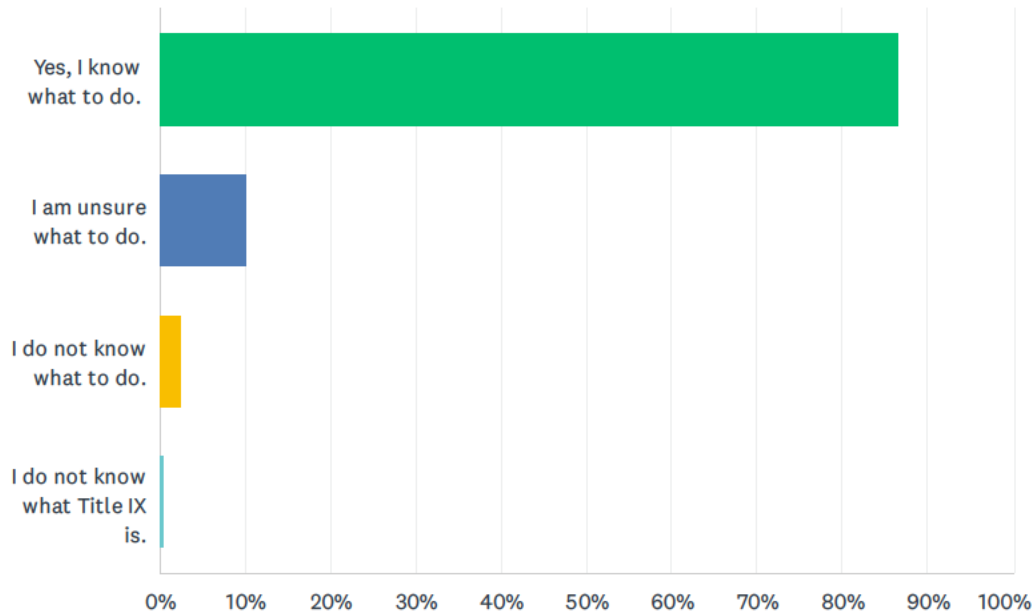
Answered: 394 Skipped: 43



ANSWER CHOICES	RESPONSES	
Very comfortable	50.00%	197
Comfortable	44.67%	176
Somewhat uncomfortable	3.30%	13
Uncomfortable (because I am unfamiliar with the provisions of FERPA)	2.03%	8
TOTAL		394

Q23 Do you know what to do under Title IX and GSU's Title IX Policy if you see misconduct or hear about misconduct from someone else?

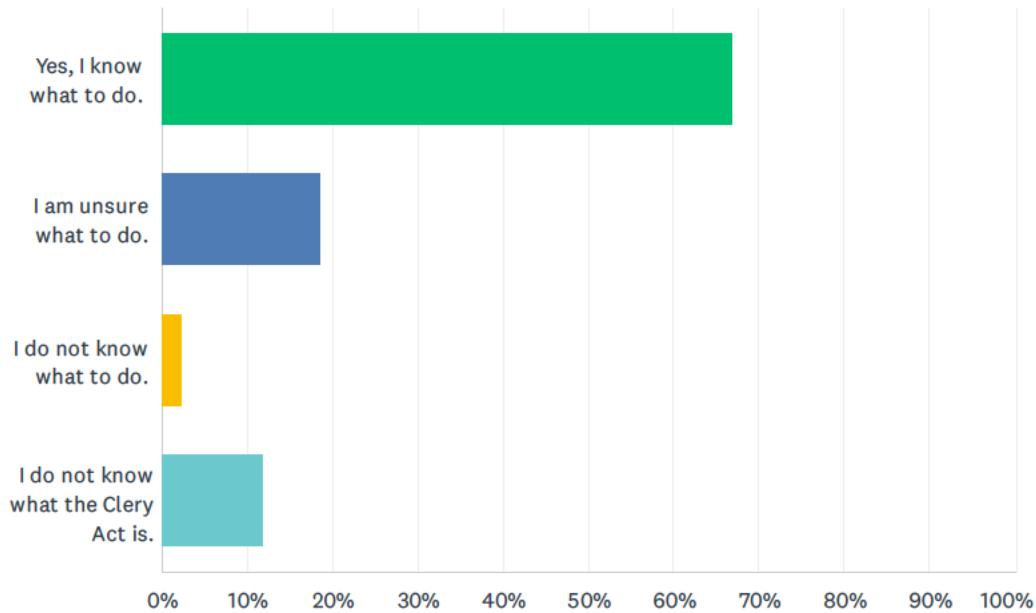
Answered: 387 Skipped: 50



ANSWER CHOICES	RESPONSES	
Yes, I know what to do.	86.56%	335
I am unsure what to do.	10.34%	40
I do not know what to do.	2.58%	10
I do not know what Title IX is.	0.52%	2
TOTAL		387

Q24 Do you know what to do under the Clery Act and GSU internal processes if you see a crime being committed on campus or hear about a crime being committed on campus from someone else?

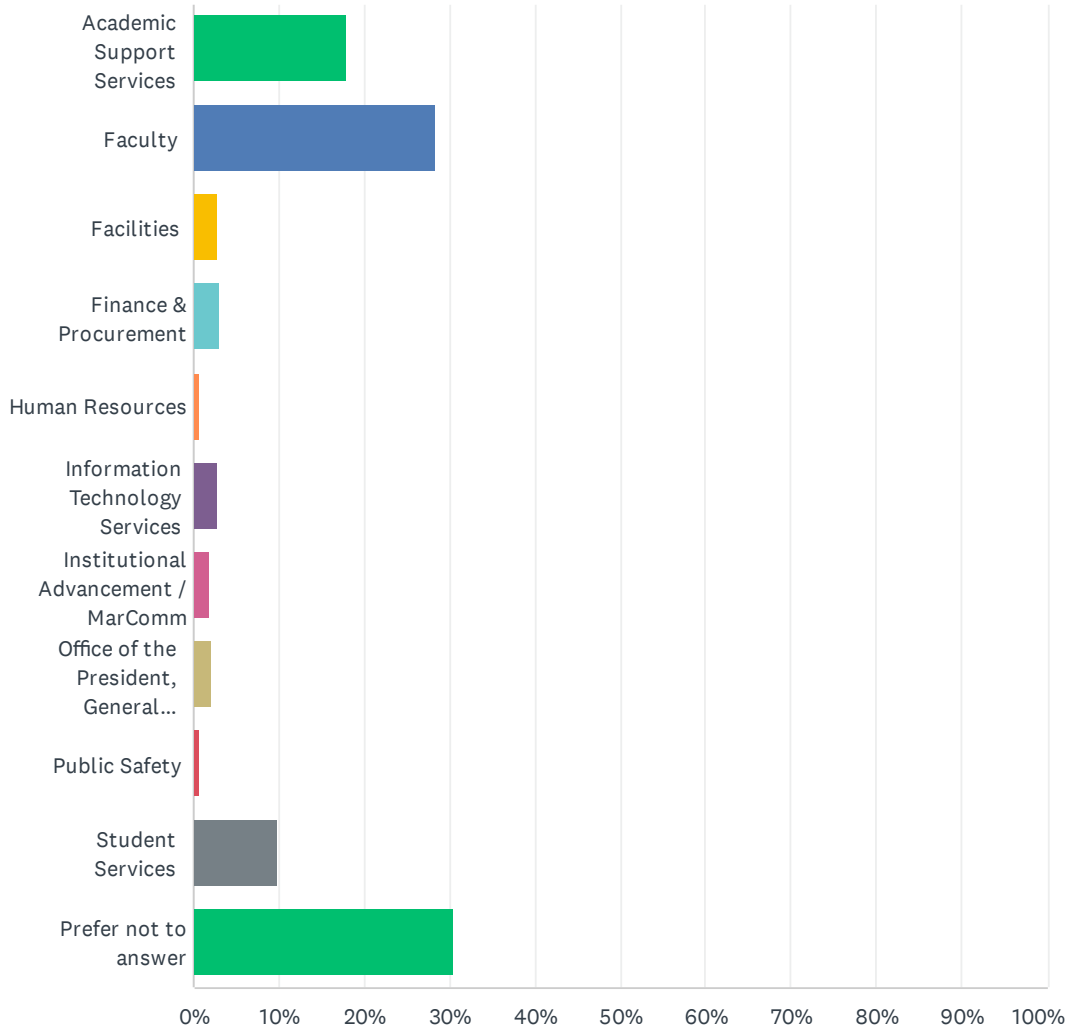
Answered: 382 Skipped: 55



ANSWER CHOICES	RESPONSES	
Yes, I know what to do.	67.02%	256
I am unsure what to do.	18.59%	71
I do not know what to do.	2.36%	9
I do not know what the Clery Act is.	12.04%	46
TOTAL		382

Q25 In which Unit or Department do you work at GSU? (select the option that fits best)

Answered: 368 Skipped: 69



2023FA Compliance Awareness Survey

ANSWER CHOICES	RESPONSES	
Academic Support Services	17.93%	66
Faculty	28.26%	104
Facilities	2.72%	10
Finance & Procurement	2.99%	11
Human Resources	0.54%	2
Information Technology Services	2.72%	10
Institutional Advancement / MarComm	1.90%	7
Office of the President, General Counsel, or Internal Auditor	2.17%	8
Public Safety	0.54%	2
Student Services	9.78%	36
Prefer not to answer	30.43%	112
TOTAL		368

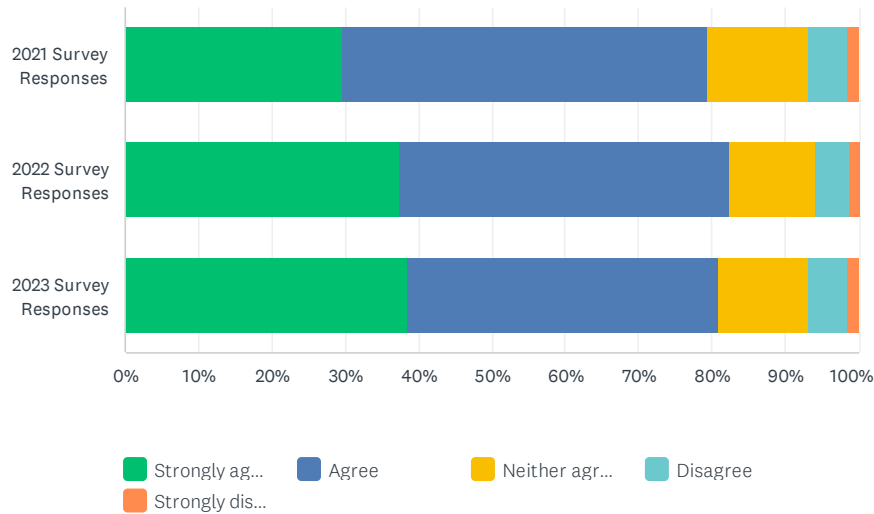


EXHIBIT 2



Q1 Please indicate your level of agreement with the following statement: “Our institution fosters a culture of compliance.”

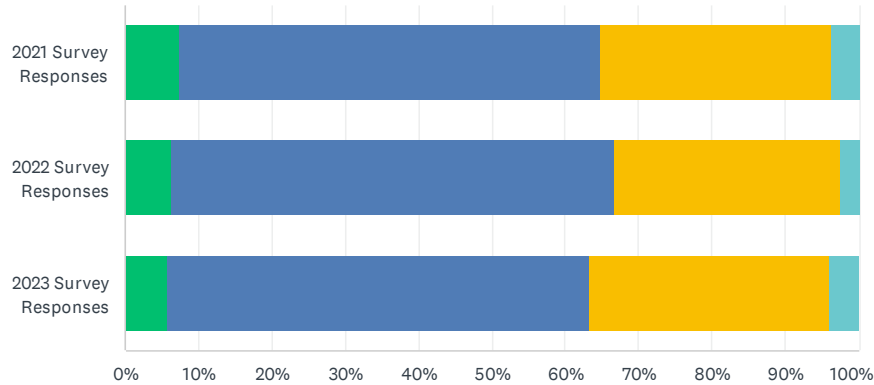
Answered: 1,234 Skipped: 2



	STRONGLY AGREE	AGREE	NEITHER AGREE NOR DISAGREE	DISAGREE	STRONGLY DISAGREE	TOTAL
2021 Survey Responses (B)	29.61% 122 AC	49.76% 205 C	13.83% 57	5.34% 22	1.46% 6	33.39% 412
2022 Survey Responses (A)	37.47% 145 B	44.96% 174	11.63% 45	4.65% 18	1.29% 5	31.36% 387
2023 Survey Responses (C)	38.39% 167 B	42.53% 185 B	12.41% 54	5.29% 23	1.38% 6	35.25% 435
Total Respondents	434	564	156	63	17	1,234

Q2 Do you think that compliance and ethics are a strong focus at GSU?

Answered: 1,223 Skipped: 13

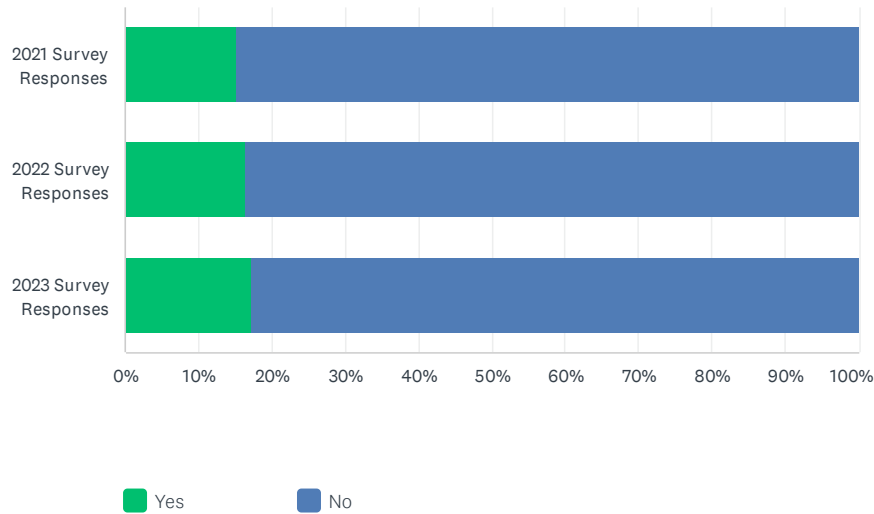


■ Yes, too mu...
 ■ Yes, just rig...
 ■ Sometimes...
 ■ No

	YES, TOO MUCH	YES, JUST RIGHT	SOMETIMES YES, SOMETIMES NO	NO	TOTAL
2021 Survey Responses (B)	7.28% 30	57.52% 237	31.55% 130	3.64% 15	33.69% 412
2022 Survey Responses (A)	6.37% 24	60.21% 227	31.03% 117	2.39% 9	30.83% 377
2023 Survey Responses (C)	5.76% 25	57.60% 250	32.72% 142	3.92% 17	35.49% 434
Total Respondents	79	714	389	41	1,223

Q3 Have you observed possible unethical behavior or noncompliance with any Laws or GSU Policies within the last twelve months?

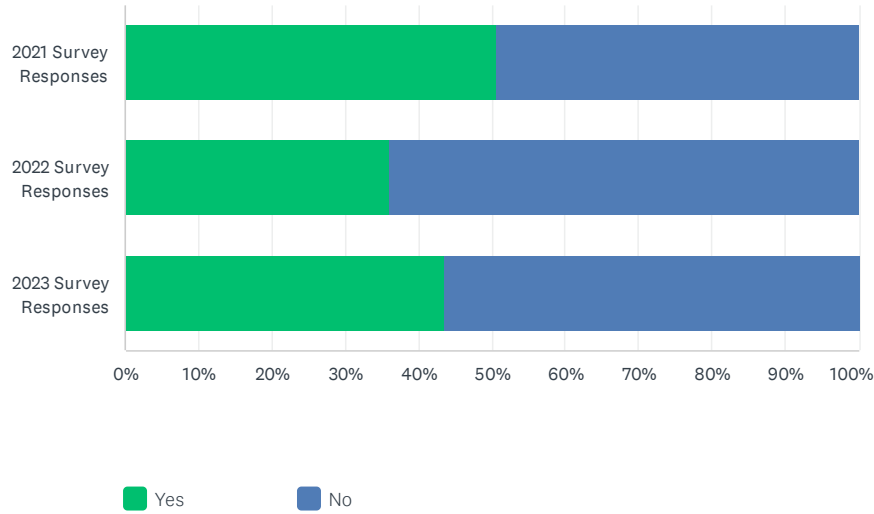
Answered: 1,203 Skipped: 33



	YES	NO	TOTAL
2021 Survey Responses (B)	15.16% 62	84.84% 347	34.00% 409
2022 Survey Responses (A)	16.30% 60	83.70% 308	30.59% 368
2023 Survey Responses (C)	17.14% 73	82.86% 353	35.41% 426
Total Respondents	195	1,008	1,203

Q4 If yes, did you attempt to report it?

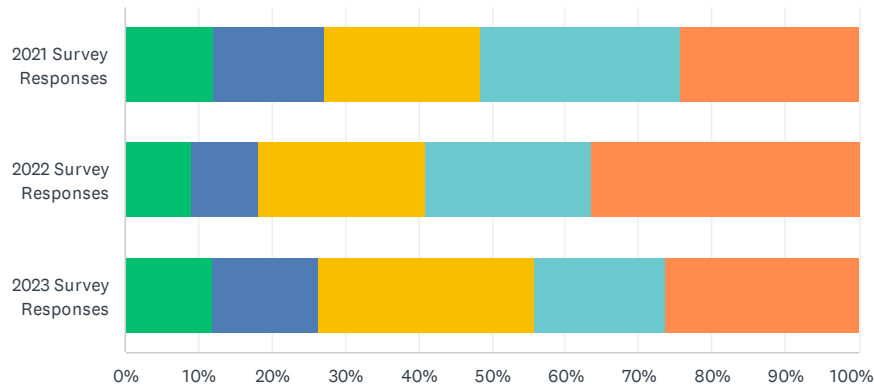
Answered: 207 Skipped: 1,029



	YES	NO	TOTAL
2021 Survey Responses (B)	50.77% 33	49.23% 32	31.40% 65
2022 Survey Responses (A)	35.94% 23	64.06% 41	30.92% 64
2023 Survey Responses (C)	43.59% 34	56.41% 44	37.68% 78
Total Respondents	90	117	207

Q5 If yes, how satisfied were you with the response to your report?

Answered: 89 Skipped: 1,147

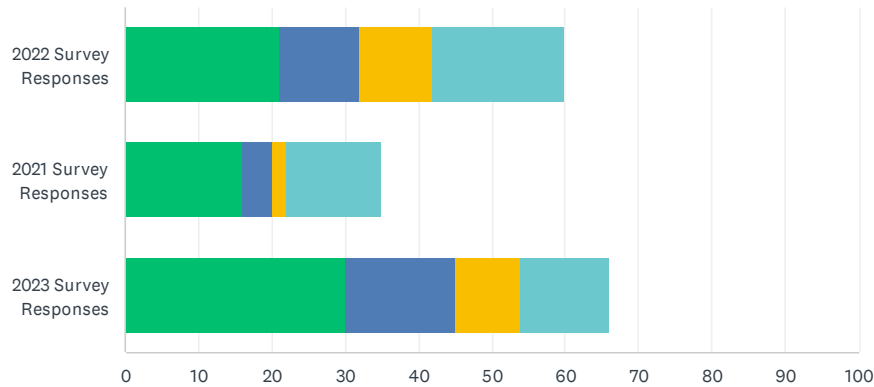


■ Completely...
 ■ Somewhat ...
 ■ Neither sat...
 ■ Somewhat ...
 ■ Completely...

	COMPLETELY SATISFIED	SOMEWHAT SATISFIED	NEITHER SATISFIED NOR UNSATISFIED	SOMEWHAT UNSATISFIED	COMPLETELY UNSATISFIED	TOTAL
2021 Survey Responses (B)	12.12% 4	15.15% 5	21.21% 7	27.27% 9	24.24% 8	37.08% 33
2022 Survey Responses (A)	9.09% 2	9.09% 2	22.73% 5	22.73% 5	36.36% 8	24.72% 22
2023 Survey Responses (C)	11.76% 4	14.71% 5	29.41% 10	17.65% 6	26.47% 9	38.20% 34
Total Respondents	10	12	22	20	25	89

Q6 If not, why not? (check all that apply and/or fill in the answer below)

Answered: 107 Skipped: 1,129

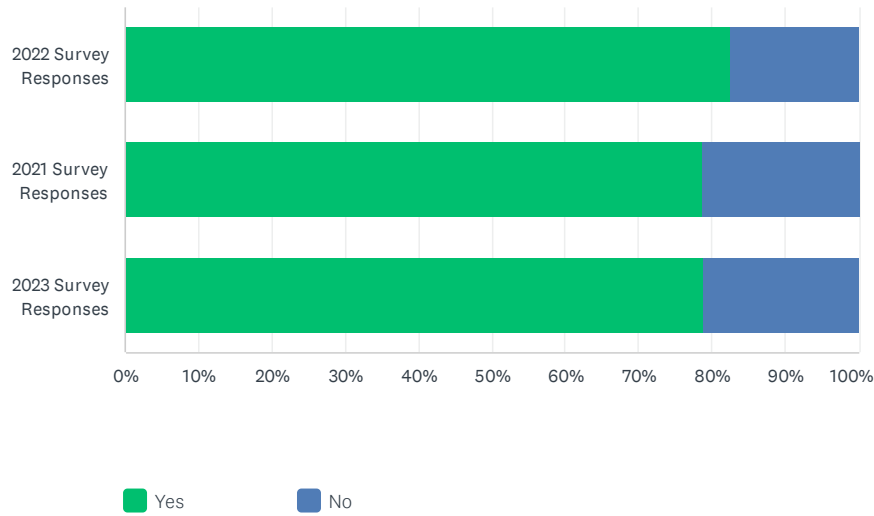


■ I didn't thin...
 ■ I was afraid...
 ■ I was afraid...
 ■ Other (plea...

	I DIDN'T THINK ANYONE WOULD DO ANYTHING ABOUT IT	I WAS AFRAID PEOPLE WOULD FIND OUT I COMPLAINED	I WAS AFRAID I'D BE FIRED OR DISCIPLINED	OTHER (PLEASE SPECIFY)	TOTAL
2022 Survey Responses (A)	56.76% 21	29.73% 11	27.03% 10	48.65% 18	56.07% 60
2021 Survey Responses (B)	57.14% 16	14.29% 4	7.14% 2	46.43% 13	32.71% 35
2023 Survey Responses (C)	71.43% 30	35.71% 15	21.43% 9	28.57% 12	61.68% 66
Total Respondents	67	30	21	43	107

Q7 Do you know how to submit a report regarding possible unethical behavior or noncompliance with Laws or GSU Policies?

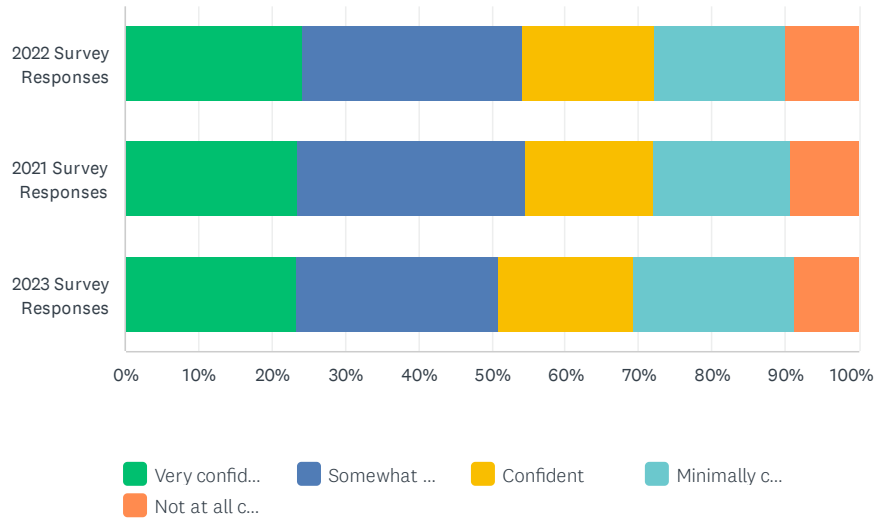
Answered: 1,185 Skipped: 51



	YES	NO	TOTAL
2022 Survey Responses (A)	82.56% 303	17.44% 64	30.97% 367
2021 Survey Responses (B)	78.80% 316	21.20% 85	33.84% 401
2023 Survey Responses (C)	78.90% 329	21.10% 88	35.19% 417
Total Respondents	948	237	1,185

Q8 How confident are you that you would be protected from retaliation, retribution, or harassment if you reported possible unethical behavior or noncompliance with any Laws or GSU Policies?

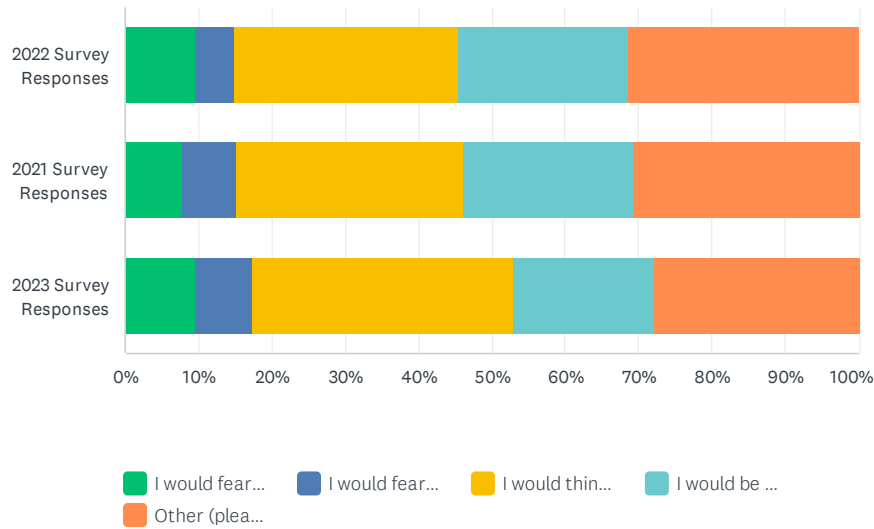
Answered: 1,185 Skipped: 51



	VERY CONFIDENT	SOMEWHAT CONFIDENT	CONFIDENT	MINIMALLY CONFIDENT	NOT AT ALL CONFIDENT	TOTAL
2022 Survey Responses (A)	24.04% 88	30.05% 110	18.03% 66	17.76% 65	10.11% 37	30.89% 366
2021 Survey Responses (B)	23.57% 95	31.02% 125	17.37% 70	18.86% 76	9.18% 37	34.01% 403
2023 Survey Responses (C)	23.32% 97	27.64% 115	18.27% 76	21.88% 91	8.89% 37	35.11% 416
Total Respondents	280	350	212	232	111	1,185

Q9 If you saw possible unethical behavior, noncompliance, or other misconduct and chose not to report it, what would be the most likely reason?

Answered: 1,136 Skipped: 100

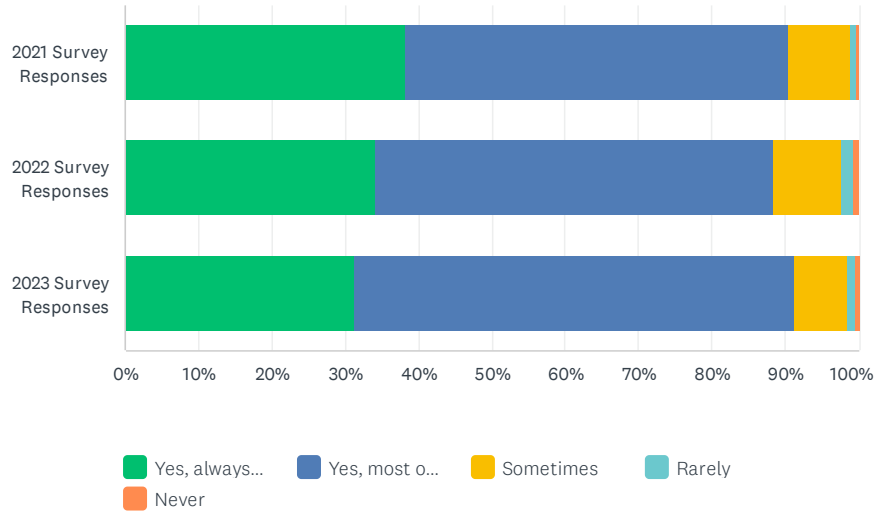


	I WOULD FEAR RETALIATION FROM MY SUPERVISOR	I WOULD FEAR BEING OSTRACIZED BY MY PEERS	I WOULD THINK GSU WOULD NOT DO ANYTHING ABOUT IT	I WOULD BE WORRIED ABOUT PEOPLE FINDING OUT THAT I REPORTED THE INCIDENT	OTHER (PLEASE SPECIFY)	TOTAL
2022 Survey Responses (A)	9.58% 34	5.35% 19	30.42% 108	23.38% 83	31.27% 111	31.25% 355
2021 Survey Responses (B)	7.79% 30	7.27% 28	31.17% 120	23.12% 89	30.65% 118	33.89% 385
2023 Survey Responses (C)	9.60% 38	7.83% 31	35.61% 141	19.19% 76	27.78% 110	34.86% 396
Total Respondents	102	78	369	248	339	1,136

2023FA Compliance Awareness Survey

Q10 Do you believe that most people working for GSU act in an ethical and compliant way?

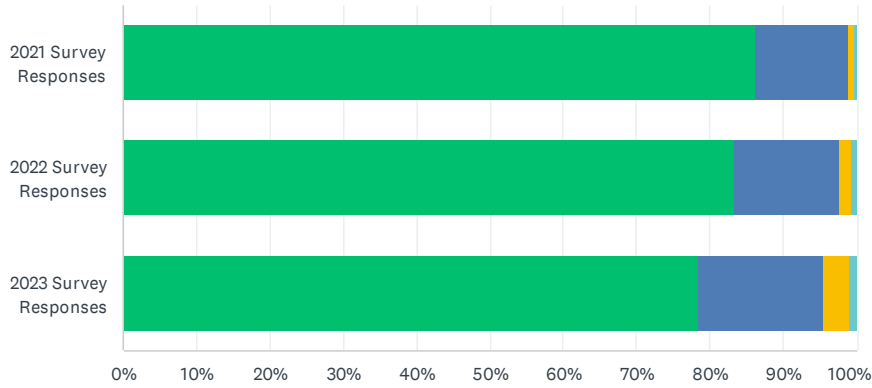
Answered: 1,156 Skipped: 80



	YES, ALWAYS OR NEARLY ALWAYS	YES, MOST OF THE TIME	SOMETIMES	RARELY	NEVER	TOTAL
2021 Survey Responses (B)	38.30% 149 C	52.19% 203 C	8.48% 33	0.77% 3	0.26% 1	33.65% 389
2022 Survey Responses (A)	34.07% 123	54.29% 196	9.42% 34	1.66% 6	0.55% 2	31.23% 361
2023 Survey Responses (C)	31.28% 127 B	59.85% 243 B	7.39% 30	0.99% 4	0.49% 2	35.12% 406
Total Respondents	399	642	97	13	5	1,156

Q11 Do you believe that GSU's Directors, Vice Presidents and President exhibit ethical and compliant behavior?

Answered: 1,138 Skipped: 98

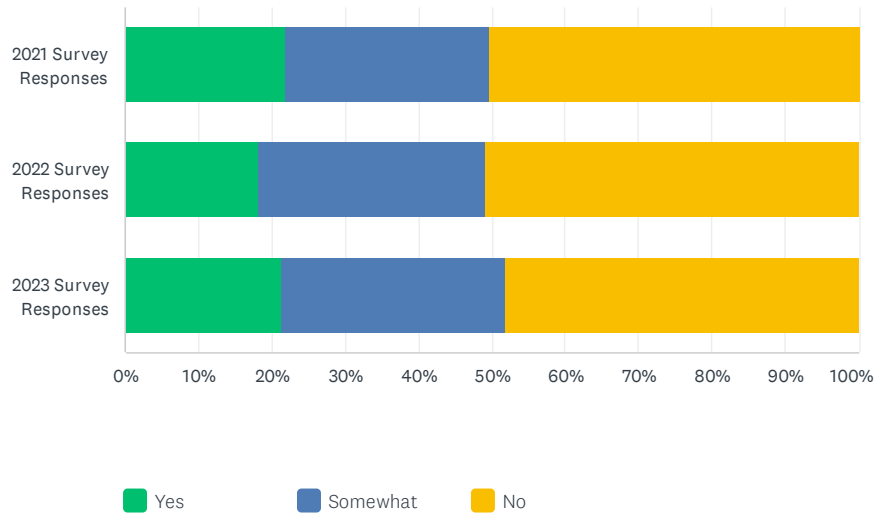


■ Yes, always...
 ■ Sometimes
 ■ Rarely
 ■ Never

	YES, ALWAYS OR NEARLY ALWAYS	SOMETIMES	RARELY	NEVER	TOTAL
2021 Survey Responses (B)	86.30% 334	12.66% 49	0.78% 3 C	0.26% 1	34.01% 387
2022 Survey Responses (A)	83.38% 296	14.37% 51	1.69% 6	0.56% 2	31.20% 355
2023 Survey Responses (C)	78.54% 311	16.92% 67	3.54% 14 B	1.01% 4	34.80% 396
Total Respondents	941	167	23	7	1,138

Q12 Do you think that high performers can get away with more than low performers when it comes to ethical and compliant behavior?

Answered: 1,138 Skipped: 98



	YES	SOMEWHAT	NO	TOTAL
2021 Survey Responses (B)	21.93% 84	27.68% 106	50.39% 193	33.66% 383
2022 Survey Responses (A)	18.26% 65	30.90% 110	50.84% 181	31.28% 356
2023 Survey Responses (C)	21.30% 85	30.58% 122	48.12% 192	35.06% 399
Total Respondents	234	338	566	1,138



Governors State
UNIVERSITY