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When HR Wears Five Hats

Practical Compliance Strategies for Colleges With Limited Staffing

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How Many Hats Are You Wearing?

Question 1: How many distinct functions are currently assigned to you?

- One or two
- Three
- Four
- Five
- More than five

Question 2: What creates the greatest strain?

- Complaint volume
- Unclear ownership
- Competing deadlines
- Conflicts between roles
- Inadequate staffing
- Managing outside investigators

Live Mentimeter poll. Join at menti.com with the code on screen.



What You Will Leave With

- 1 **A triage framework** for deciding what needs immediate attention and who should own it.
- 2 **A role and conflict mapping tool** for identifying overlap that threatens neutrality or capacity.
- 3 **A structured intake process** for lengthy or AI assisted complaints.
- 4 **An operating mindset:** the Six Hats Minus One framework for reducing crisis driven work.

Everything in this session is built for the staffing you have now, not the staffing you wish you had.



One Office, Many Mandates

Functions commonly concentrated in one small office:

Employee relations	EEO compliance	Title IX coordination	ADA and Section 504	Workplace investigations
Labor relations	Student conduct coordination	Training and prevention	Policy development	Records and reporting

The problem is not effort or commitment. It is the assignment of multiple specialized and sometimes conflicting functions to the same small group of people.



Six Hats Minus One

The Firefighter	The Designer	The Teacher	The Architect	The Multiplier	The Leverager
The hat to lose. Crisis response as a way of life.	Build compliance into the workflow.	Create habits, not events.	Collect once, use many times.	Make supervisors compliance capable.	Borrow before you build.

Every fire is a clue that a system may be missing.

Most compliance emergencies are predictable.

Your calendar, not your inbox, should set priorities.

Most compliance fires begin as small risks that went unnoticed, undocumented, or unmanaged.



The Designer and the Architect: Build It In, Build It Once

The Designer: build it in
A risk based compliance calendar
A compliance heat map
Checkpoints inside routine HR actions
Standardized forms and workflows
Succession planning across the team

The Architect: build it once
One owner, one location, one retention schedule for every record
Standard templates for accommodations, leave, investigations, hiring, and performance
Automation triggers that reduce manual work
AI tools, used responsibly, for drafting and tracking

Good design prevents problems before people have a chance to create them. Less time searching for information means more time managing risk.



The Teacher and the Multiplier: Extend Your Reach

The Teacher: coffee cup sizes
Five minute monthly compliance tips
Quarterly compliance refreshers
Manager office hours
Supervisor toolkits
Short video updates

The Multiplier: equip supervisors
Interview guides
Leave request flowcharts
Documentation templates
Escalation protocols
Discipline decision trees

Do not make managers employment lawyers. Make them compliance capable.

A well trained management team expands HR's reach without adding staff.



The Leverager: Borrow Before You Build

Nearby institutions

Compare structures and share solutions.

Statewide HR colleagues

ACHRO and peer networks across the system.

Chancellor's Office resources

Guidance, training, and technical assistance.

Community college networks

Regional consortia and affinity groups.

Professional HR communities

Templates, audit tools, and lessons learned.

Outside counsel and vendors

Targeted expertise for defined questions.

Who has already solved the problem you are trying to solve today? Collaboration is a staffing strategy.



Five Things You Can Do Now

1	2	3	4	5
Triage	Standardize	Separate	Outsource	Document
Urgency, risk, deadlines, and conflicts	Repeatable administrative work	Functions and decisions, where needed	Strategically, not reflexively	Ownership, referrals, scope, and decisions

The same five moves repeat through everything that follows. They are how the Firefighter hat comes off.



Triage by Urgency, Risk, and Conflict

Screen every new report for

Immediate safety or health concerns

Need for supportive or interim measures

Evidence that may be lost or altered

Applicable policy or legal deadlines

Alleged retaliation or continuing conduct

Involvement of senior leadership

Conflicts in the normal reporting structure

Need for specialized subject matter expertise

Parallel processes with law enforcement, a union, or another agency

Higher urgency, higher risk
Act now and escalate.

Higher urgency, lower risk
Stabilize quickly with the standard owner.

Lower urgency, higher risk
Plan deliberately and involve counsel.

Lower urgency, lower risk
Standard process and timeline.

Intake does not decide the merits. It decides what must happen first, who owns it, and what cannot wait.

The First 24 Hours: Stabilize Before You Solve

1 Acknowledge receipt

2 Confirm a reliable means of communication

3 Assess safety and support needs

4 Preserve potentially relevant evidence

5 Identify immediate notice or reporting obligations

6 Assign a lead and a backup

7 Calendar known deadlines

8 Identify any apparent conflict

9 Avoid prematurely defining the entire scope

10 Explain the next step and expected timing

Silence while HR sorts out internal ownership can be read as institutional inaction.



Standardize What Is Repeatable

Twelve documents that should never be built from scratch twice:

Initial acknowledgment

Intake questionnaire

Conflict screening form

Referral memorandum

Allegation chart

Scope confirmation

Investigation plan

Status update

Vendor assignment letter

Closure memorandum

Case chronology

Prevention and training calendar

Standardization reduces administrative burden without replacing judgment. It preserves professional time for credibility analysis, supportive measures, difficult conversations, and prevention.

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One Intake, Several Possible Lanes

One central intake point	Title IX	EEO and protected class discrimination
Acknowledge, screen, and route	ADA and Section 504	Employee relations
One coordinator for the overall matter	Student conduct	Labor agreement or grievance
A named owner for each process lane	Workplace safety	Policy or performance concerns

Careful: routing, delay, discouragement, or role confusion that interferes with access to a protected process creates compliance and retaliation risk. An HR referral is not automatically retaliation. Interference is the issue.

The complainant should not be sent from office to office. Internal routing is the institution's responsibility.



Separate Functions Even When You Cannot Separate People

Assign each decision point deliberately

Receives the initial report

Determines the applicable process

Provides supportive measures

Defines investigative scope

Investigates

Reviews the investigation

Makes findings

Decides corrective action

Hears any appeal

Communicates with the parties

Practical safeguards

Written decision rights

Conflict screening at intake and at major decision points

Alternate reviewers

Documented recusals

Review by counsel where appropriate

Clear disclosure of roles to the parties

Role overlap is not automatically disqualifying. The question is whether it compromises neutrality, creates incompatible responsibilities, or reasonably undermines confidence in the process.

Outsource the Right Work, With the Right Controls

The decision screen
Internal capacity
Actual or perceived conflict
Complexity
Specialized expertise
Neutrality
Time sensitivity
Cost
Availability of internal review

Quality controls
Written scope
Named project lead
Required milestones
Communication schedule
Investigation plan
Document and interview standards
Report format
Review process
Change authorization
Final decisions stay with the institution

Piecemeal outsourcing sometimes demands more local coordination, not less. Outsource work, never accountability.



AI Assisted Complaints: What Are You Seeing?

Since generative AI became widely available, have complaints at your institution become...

More frequent

Longer

More legally framed

More repetitive

More difficult to scope

No different

Unsure

Tell us what you are seeing

One or two volunteers.
What has changed at your institution?

Ground it in experience. There is no reliable statewide data on AI assisted complaint volume. This poll is about what you are seeing at your own institution.

Live Mentimeter poll. Join at menti.com with the code on screen.



Read for Facts, Not Formatting

What the submission may contain
A lengthy factual narrative
Repeated versions of the same event
Numerous legal labels
Citations that may or may not apply
Demands that exceed available remedies
Formal language unlike the complainant's ordinary communication
Background material unrelated to any actionable allegation

What intake should separate
Who allegedly acted
What allegedly occurred
When and where it occurred
Who witnessed it
What harm or continuing concern is asserted
What protected basis or protected activity may be implicated
What immediate response is requested
What is background, argument, or duplication

Fair treatment	Do not treat a complaint as less credible because it is polished, lengthy, or likely AI assisted.
Careful scoping	Do not assume every cited statute or legal conclusion creates a separate claim or required process.



A Structured Protocol for AI Assisted Submissions

1	Preserve	Keep the complete original submission.
2	Acknowledge	Confirm the entire submission was received.
3	Chart	Create an allegation chart organized by event.
4	Consolidate	Merge duplicate descriptions without deleting distinct facts.
5	Ask	Pose focused follow up questions.
6	Confirm	State the institution's understanding of the allegations and proposed scope.
7	Communicate	Set one channel and a reasonable update schedule.

Identify the factual allegations and institutional obligations first. Do not open intake by debating the accuracy of AI generated citations.

Exercise: Map Your Five Hats

1

Map ownership

Who owns each function today, and who is the backup.

2

Find the overlap

Where the same person occupies multiple decision points.

3

Flag the risk

Actual or perceived conflicts, workload concerns, and gaps.

4

Choose the fix

Triage, standardization, separation, referrals, or outside support.

First map your own structure. Then apply the framework to a common scenario.



Part One: Map Your Current Structure

Functions to map	
Employee relations	EEO
Title IX	ADA and Section 504
Investigation	Supportive or interim measures
Findings	Corrective action
Appeal	Student conduct coordination
Vendor management	Prevention and training

Worksheet columns
Current owner
Backup
Reporting relationship
Potential conflict
Reassignment trigger
Outside resource
Needed improvement

Five minutes of table work. Mark your two most significant vulnerabilities.



Part Two: The 32 Page Complaint

The scenario. A classified employee submits a 32 page complaint that appears to be AI assisted. It names four supervisors and an HR analyst, and alleges sexual harassment, disability discrimination, retaliation, bullying, payroll errors, failure to accommodate, and violations of several federal and state statutes, with many allegations repeated under different legal headings. The employee asks that a supervisor be removed immediately and that all communications occur through HR. The vice president of HR also serves as the Title IX Coordinator and ADA Coordinator. The named HR analyst normally manages complaint intake. The college's regular investigator reports to the vice president.

Each table answers:

What requires immediate attention?	What can remain internal?
What factual clarification is needed?	What should be outsourced?
Which institutional processes may apply?	What should the first communication say?
Who should coordinate the matter?	How should the allegations be organized?
Who should not participate?	What deadlines or status dates should be calendared?

Six minutes of table work.

Share Out and a Model Response

Each table shares	A model response	
One significant conflict or structural risk One practical solution	Acknowledge the entire submission	Assess immediate safety and accommodation needs
	Use an alternate intake contact	Preserve all documents
	Build a fact based allegation chart	Identify coordinated but distinct process lanes
	Screen the vice president and internal investigator for conflicts	Assign an independent coordinator or reviewer where necessary
	Confirm scope with the complainant	Establish one point of communication
	Decide which portions require outside investigation	Document all routing and recusal decisions

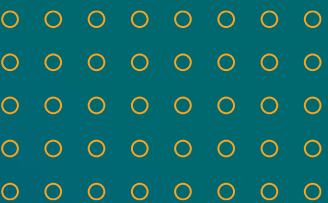
Every step maps back to the framework: triage, standardize, separate, outsource, and document.

What You Can Do in the Next 30 Days

- 
- | | | | |
|---|---|----|---|
| 1 | Complete the role and conflict map | 6 | Prequalify outside resources before a crisis |
| 2 | Name a backup for every essential function | 7 | Adopt an allegation chart for complex complaints |
| 3 | Adopt a common triage and intake protocol | 8 | Review how employee and student complaints are routed |
| 4 | Create or update five core templates | 9 | Set a policy and legal update calendar |
| 5 | Establish written recusal and reassignment triggers | 10 | Protect time for prevention |

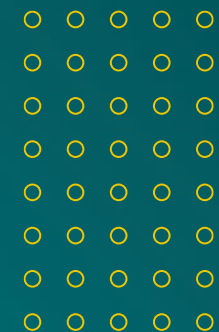
Circle the first action you will take.

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Questions?

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Clearer Roles Are a Form of Capacity

You may not be able to add staff tomorrow. You can make ownership, escalation, role separation, and documentation clearer today.

In your participant packet and the appendix:

Triage matrix

Role and conflict map

AI assisted complaint allegation chart

Outsourcing checklist

30 day action plan

Look back at the opening poll. The goal is not to eliminate every overlapping role. It is to make those roles deliberate, transparent, and manageable.





Appendix

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Appendix 1: Complaint Routing Matrix

Process lane	Typically applies when	Typical owner
Title IX	Sexual harassment or other sex based misconduct in a program or activity	Title IX Coordinator
EEO and discrimination	Protected class discrimination or harassment outside the Title IX scope	EEO officer or designee
ADA and Section 504	Accommodation, access, or disability related concerns	ADA or 504 Coordinator
Employee relations	Performance, conduct, or interpersonal workplace concerns	Human resources
Student conduct	Alleged student violations of the student code	Student services
Labor agreement	Matters covered by a collective bargaining agreement or grievance procedure	HR and labor relations
Workplace safety	Threats, violence, or physical safety concerns	HR, safety office, or campus police
Policy or performance	General policy or performance concerns without a protected basis	Supervisor with HR support

One matter can occupy several lanes at once. Coordinate the lanes rather than forcing the matter into one.

Appendix 2: Conflict Screening and Reassignment Questions

- 1 Is any assigned person named in, a witness to, or personally involved in the matter?
- 2 Does any assigned person supervise, or report to, a named party?
- 3 Has any assigned person previously advised on the underlying events?
- 4 Would a reasonable observer question the neutrality of the assignment?
- 5 Does the matter involve senior leadership or a board member?
- 6 Are incompatible roles assigned to the same person, such as investigator and decision maker?
- 7 Is there a documented alternate for each affected role?
- 8 Has the screening decision itself been documented?

Screen at intake and again at each major decision point.

Appendix 3: Outsourcing Scope and Quality Control Checklist

Define the scope in writing	Keep institutional control
Named matter and allegations covered	Named internal project lead
Deliverables and report format	Access to counsel for privilege questions
Milestones and target dates	A defined review process for the draft report
Communication schedule and points of contact	Records retained by the institution
Document and interview standards	Final findings and decisions made by the institution
Change authorization process	Post engagement debrief and lessons learned

Outsource work, never accountability.



Appendix 4: Sample AI Assisted Complaint Allegation Chart

No.	Date or period	Person involved	Conduct alleged	Witnesses	Possible process	Status
1	March 2026	Supervisor A	Comments about medical leave during a staff meeting	Two coworkers	ADA and Section 504; employee relations	Follow up scheduled
2	April 2026	Supervisor A	Denied schedule change after the complaint was submitted	Payroll records	Retaliation review	Documents requested
3	April 2026	Supervisor B	Repeated comments about appearance	One coworker	Title IX or EEO, pending screening	Intake questions sent

The full chart also captures location, documents and digital evidence, and immediate action taken.

One row per distinct event. Duplicate descriptions consolidate into the row they describe.



Appendix 5: Current Federal and California Legal Authorities

Federal
Title IX, 20 U.S.C. § 1681 et seq.; 34 C.F.R. part 106 (2020 regulations currently enforced following vacatur of the 2024 amendments)
Title VII, 42 U.S.C. § 2000e et seq.
Americans with Disabilities Act, 42 U.S.C. § 12101 et seq.; Rehabilitation Act § 504, 29 U.S.C. § 794
Clery Act, 20 U.S.C. § 1092(f)

California
Fair Employment and Housing Act, Gov. Code § 12900 et seq.
Ed. Code § 66281.8 (SB 493 procedures for postsecondary sexual harassment complaints)
Cal. Code Regs., tit. 5, § 59300 et seq. (community college discrimination complaint procedures)
Lab. Code § 1102.5; Ed. Code § 87160 et seq. (whistleblower protection)

Review and refresh shortly before September 30, 2026. The federal Title IX enforcement posture remains subject to change, and this slide should be verified against current authority in the final week.

