Crisis Management: Keeping Your Publics (Including Your Accreditors) Informed and Remaining in Compliance with Federal Regulations

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In this session we will discuss...

- Crises beyond the institution’s control
- Crisis implications of Commission actions
- Federal regulations
- Media monitoring and campus actions
- Helpful hints to manage crises and keep MSCHE and others informed
Crises Can Take Many Forms

- Fire
- Strike
- Chemical Contamination
- Financial Scandal
- Athletics Scandal
- Criminal Activity by an Employee or Board Member
- Abrupt Illness of Death of a Key Employee or Leader
Crisis Can Take Many Forms

- Budget Problems
- Abduction or a Student
- Attack on a Student (rape, murder, etc.)
- Political Intervention/Interference
- Severe Accident on Campus
- Loss of Building, Temporary Loss of Access to Building or Loss of Operational Systems
- Loss of Communications
- National/International Emergency
- Natural Disaster
Crisis Can Take Many Forms

- Shooter on Campus
- Terrorist Activity
- Abuse Cover-Up

Most crises cannot be predicted!
In Times of Crisis, There Are Many “Publics” to be Kept in the Loop

- Elected Officials
- Employees
- Students
- News Media
- Trustees
- Donors
- Vendors
- Accreditors
- General Community
- *Investors (for-profit institutions)
- Alumni
- Advisory Committees
- School Districts
- Key Communicators
During a crisis, an organization must speak with “One Voice.”

This is a consistent message, regardless of who is speaking with the media or other publics.
The Institution Should Have a Crisis Communication Team to Coordinate the Official Message(s)

- President
- Senior Public Relations/Communications Officer
- Media Spokesperson (if not the same person as above)
- Other Staff as Needed
- The Board Chair should be consulted regarding the official message(s).

*Some institutions have opted to hire crisis communication firms. Such a decision should be weighed against the costs and time delays.*
The Crisis Communication Team and a Broader Crisis Management Team Should...

- Assess the situation
- Assign responsibilities
- Develop responses in a timely manner that are proportionate to the situation and (1) not an overreaction or (2) not a “head–in–the–sand” reaction
- Try to be proactive and honest
- Recognize the problem and report on steps being taken in reaction to the crisis.
- Cooperate with appropriate agencies.
Crisis management and communication for many years took the form of keeping the public informed via radio, television, and newspapers. This process changed in the wake of the Virginia Tech shootings and other high profile incidents on college and university campuses. In addition, technological advances have made quick notification much easier (social media, automated notifications, and more).
It can be especially helpful during a crisis to assign someone with the right experience, knowledge, and disposition to monitor social media and respond when necessary in an appropriate and forthright manner.
Because of the widespread use of Facebook, Twitter, LinkedIn, and other social media, your institution can be rapidly overwhelmed by social media reactions if you don’t act quickly during a crisis.
The Jeanne Clery Act

Originally developed to require colleges and universities to annually report campus crime statistics, amendments now require much more.
The Jeanne Clery Act 2000 & 2008 Amendments

- Added provisions dealing with registered sex offender notification and campus emergency response.
- Added provisions to protect crime victims, whistleblowers, and others from retaliation.
This has been part of the Clery requirements since 1990.

“Timely” warnings are limited to those crimes an institution is required to include and report on in its Annual Security Report:

- Criminal Homicide
- Sex Offenses
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson
- *Campuses must also report on alcohol and drug violations*
Devise An Emergency Response, Notification and Testing Policy

- Institutions must inform the campus community about a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.

- An “emergency response” expands the previous definition of “timely warning” to include additional types of incidents, including infectious disease outbreaks, shooters on campus, fires, etc.
Devise An Emergency Response, Notification, and Testing Policy

- All institutions (residential and non-residential) must have emergency response and evacuation procedures in place and must summarize those procedures in their Annual Security Report.
- Institutions must test their procedures at least once per year.
- The U.S. Department has been taking an increasingly dim view on non-compliance and has levied hefty fines.
Some Useful Resources

- U.S. Department of Education *Action Guide for Emergency Management at Institutions of Higher Education*  

- The U.S. Department of Justice has awarded a $2.3 million grant to the University of Vermont to establish the National Center for Campus Public Safety. The Center will be a one-stop shop for resources, advice, training, and best practices on threat assessment, emergency management, and compliance with the Clery Act.
The Role of Middle States in Campus Crises
Commission Actions

- Depending on institutional history and other factors, both internal and external to the institution, a Commission action of Warning or Probation can trigger a crisis.
- Be open and honest with internal and external constituents regarding what the institution is doing to confront the issues.
- Be aware of collective bargaining issues that can effect an accreditation-related crisis.
Although MSCHE does not accredit individual programs, a threat to the professional or specialized accreditation of a program may indicate matters that could be of concern to the Commission.

When an institution receives notification of a threat to a program’s accreditation, it is obligated to notify the Commission.
Requirement of Affiliation #5: The institution complies with all applicable government (usually Federal and state) policies, regulations, and requirements.

- Clery Act
- All relevant financial aid regulations
- Title IX
- Other relevant laws and regulations
Accreditation Standard #6: Integrity

- Requires “honesty and truthfulness in public relations announcements, advertisements, and recruiting and admissions materials and practices.”
MSCHE Policy, Advertising, Student Recruitment, and Representation of Accredited Status

“All statements and representations should be clear, factually accurate, and current. Supporting information should be kept on file and readily available for review.”
“If an institution conducts its affairs in ways which generate serious public concern, the Commission reserves the right to request further information from the institution.”

The Commission sometimes learns of serious matters that had not been reported by the institution via:

- Daily media monitoring
- Complaints
- Third-party comments
The Commission is obligated by Federal regulation to follow-up on any complaint or third-party comment that provides evidence indicating potential non-compliance with:

- Accreditation standards
- Requirements of Affiliation
- Commission policies
- Institution’s own published policies
- Accreditation-relevant federal regulations.
Comments and Questions?
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