

Review of the Office of the General Counsel, University of Iowa

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I. Introduction

This document summarizes the findings of a review of the University of Iowa Office of the General Counsel (OGC). As established by the UI Operations Manual (28.4) the primary purposes of this review are: 1) to provide an occasion for central administration officers to evaluate their programs and to explain the roles, functions, procedures, and activities of their offices and officers to the faculty; 2) to permit a systematic faculty evaluation of these offices and officers aimed at making recommendations for improvements in administrative structure and/or performance. This review was conducted under the joint authority of the Faculty Senate President (Russell Ganim) and the University of Iowa President (J. Bruce Harreld). President Ganim, with the approval of President Harreld, appointed and charged the committee to conduct the review beginning in the spring semester, 2019.

The review had two components: 1) a review of the Office of the General Counsel—the findings of this review are detailed here and will be posted on the UI Faculty Senate website; 2) a review of the Vice President for Legal Affairs and General Counsel (Carroll J. Reasoner)—the findings will be included in a separate report that will be shared with President Harreld and considered a confidential personnel record.

II. Review process

1. The OGC prepared a self-study document (submitted January 11, 2019), which was reviewed by the committee. The self-study is included as Appendix A.
2. The committee had an initial meeting with Vice President Reasoner on March 6, 2019 to address questions related to the OGC self-study.

3. The committee reviewed the previous OGC review report (2004).
4. The scope of the current review was 2008-present, the time during which Carroll Reasoner has served as Vice President for Legal Affairs and General Counsel.
5. The review focused on the following questions:
 - a. How well does the OGC provide legal services to the University of Iowa?
 - b. Is the OGC structure optimal and does it have adequate resources to fulfill its missions?
 - c. What is the relationship between the OGC and attorneys outside the office, including those at UIHC, the Office of the Attorney General, and the Board of Regents?
 - d. How does the OGC provide evaluation, training, and support for its attorneys and staff?
 - e. What are the biggest challenges for the OGC?
 - f. Are there ways that the services provided by the OGC could be improved?
6. To address these questions, the committee conducted interviews on April 24-26 with UI administrative leaders who frequently utilize the services of the OGC (Appendix B). This included President Harreld (in the presence of Vice President Reasoner, at President Harreld's request), a subset of UI Vice Presidents and Deans/Associate Deans, and unit directors. The committee interviewed each of the OGC attorneys and legal assistants. Iowa Assistant Attorney General George Carroll was also interviewed by the committee.
7. The committee administered an anonymous survey to Deans and other senior administrators who were not interviewed. The response rate was 71%. The quantitative results and free-responses are presented in Appendix C. The survey included an option for individuals to meet with the committee to provide additional feedback; none requested such a meeting.

8. We were assisted in the review by an external consultant, Raymond Taffora, Vice Chancellor for Legal Affairs and General Counsel, University of Wisconsin-Madison. Mr. Taffora was a member of the review committee. He traveled to Iowa City April 23-26 to participate in on-site interviews and provided additional input by phone. His insight and advice were invaluable to the process and greatly appreciated.

9. The committee chair (Peter Snyder) interviewed Timothy Lynch, Vice President and General Counsel, University of Michigan. He provided insight into oversight relationships between OGCs and academic health care centers.

10. Following the on-site interview, the committee chair conducted a follow-up interview with Vice President Reasoner to address additional questions that arose in the course of the review.

11. A draft of the report was provided to Vice President Reasoner on December 3, 2019 for correction of factual errors.

III. OGC structure and resources

UI President Hunter Rawlings created the OGC in 1992, replacing a system in which the UI President and other upper level administrators retained attorneys on their staffs to provide legal advice. Following the creation of the OGC, litigation remained within the purview of the Office of the Attorney General (OAG), with assistance from OGC attorneys and staff.¹

Carroll Reasoner has directed the OGC as General Counsel since 2008. She was initially appointed in an interim role, and then on a permanent basis in October, 2010. She reports directly to the UI President. In her role as Vice President for Legal Affairs, she serves on the

¹ An exception is that University of Iowa Physicians are represented in litigation by outside attorneys.

President's advisory cabinet. This allows her to provide both legal advice and policy advice to the President and other senior administrative leaders, and to anticipate legal issues that might arise.

The OGC employs five additional attorneys. Two have the title Deputy General Counsel (Gay Pelzer and Maria Lukas). Each has served in the OGC for more than 17 years. There are three Deputy Counsel (Nathan Levin, Ian Arp, and Ann Byrd), who have served from 1-8 years. The OGC benefits from two long-serving Legal Assistants (Mary Cross and Jackie Kjaer). Over the last 10 years, the office size has decreased by 1.5 FTE. The OGC is located in Jessup Hall. All of the OGC attorneys are located in this office, which facilitates communication and collaboration.

The size of the OGC is small in comparison to peer institutions. For example, within the Big 10, the OGC at Ohio State employs 36 attorneys, 28 at the University of Michigan, 27 at the University of Illinois, 21 at Rutgers, 17 at the University of Minnesota, 13 at the University of Wisconsin, Madison, 15 at Indiana University, 15 at Penn State University, 8 at the University of Maryland, 7 at the University of Nebraska, 11 at Michigan State University, 9 at Northwestern University, and 6 at Purdue University. A UI peer outside the Big Ten, the University of North Carolina, has 18 attorneys in their Office of University Counsel.

Inherent differences between universities make direct comparison of these numbers difficult. The number of administrators, students, faculty, and staff vary significantly, and some OGCs serve multiple campuses (e.g. Penn State University). On some campuses, much of the

legal work is performed by outside firms (e.g. Purdue University). There is variation in the utilization of Attorneys General offices to conduct litigation. Some campuses have health care systems represented by the OGC and others do not. In spite of these complexities, the size of the OGC at Iowa is clearly small in comparison to its peers. With only two support staff, the UI OGC also appears to provide less assistance to its attorneys than its peers.

OGC attorneys and legal assistants report to the Vice President for Legal Affairs and General Counsel. Each undergoes a formal performance review on an annual basis, which staff described as detailed and meticulous. They also receive ongoing feedback on the quality of their work. Since the Vice President for Legal Affairs and General Counsel reports to the UI President, the President conducts her annual performance review.

Because of the small size of the office, each attorney functions as a generalist, handling cases in a number of different areas. However, they each also specialize in specific areas of law, and develop close working relationships with the administrators that serve these areas. Many administrators contact a specific attorney directly based on these working relationships, and they involve Vice President Reasoner only in matters of high institutional risk. Vice President Reasoner has an open-door policy for her staff. She wants to be aware of and involved in big issues and challenging cases. However, she does not micromanage the work of her attorneys. She is a strong advocate for the staff in her office and the responsibilities they assume. In addition to her role as General Counsel, Ms. Reasoner serves on the UI President's cabinet as Vice President for Legal Affairs. In this capacity, she not only provides legal advice, but she also advises the President on matters of general university policy. The working relationship between President

Harreld and Vice President Reasoner appears to be very strong with a high level of trust between them.

There appear to be high levels of camaraderie and job satisfaction among the OGC attorneys and support staff. Although the attorneys work long hours and their pay is considered to be low relative to peers, these negatives are offset by advantages inherent in working in an academic setting, including a good mix of cases and the lack of pressure to maintain a high level of billable hours, common in private law practice. When turnover has occurred, there has generally not been difficulty in filling open positions. OGC attorneys serve on a number of campus committees (OGC Self Study, Appendix A, Exhibit B), providing a legal perspective at the formative stages of committee deliberations. They have the opportunity to participate in continuing legal education activities, which enables them to obtain and maintain knowledge in highly specialized areas of law. These activities, however, have been significantly limited by time constraints and by a tight OGC budget (as described below). Because legal issues faced in higher education are highly complex and change rapidly, and they pose a high level of risk to the University, it is critical that OGC attorneys have access to sufficient ongoing legal training.

Recommendation: Provide funding to enhance opportunities for OGC attorneys to participate in ongoing legal training.

The annual budget for the OGC is \$1,567,463. This has been unchanged over the last two years and increased only 1% in the prior two years. Under a new decentralized UI budget model (modified responsibility center management) implemented in 2017, the OGC is considered a

central service unit. As such, it receives funding from the UI colleges and other revenue-generating units (e.g. Department of Athletics, Residence Services, Parking). The amount contributed by each unit is based on its number of faculty, students, and staff, and not its frequency of utilization of the OGC. This aspect was thought to be important, since implementation of utilization fees might pose a barrier to units proactively seeking legal advice. Under the new UI budget model, the OGC budget could be increased in one of three ways. If the State of Iowa appropriation to UI is increased, a portion of the increase is allocated to the OGC through a formula. Likewise, increases in tuition revenue are also shared with the OGC. Finally, the OGC can request increased funding to fulfill specific needs. Such requests are considered by the Central Support Central Services Advisory Committee² and then by the Budget Review Board.³

IV. OGC missions and roles

The OGC self-study states “the mission of the OGC is to provide or coordinate effective legal services on issues facing all sectors of the University of Iowa, striving always to maintain the highest level of professionalism and integrity.” Although the OGC is small, its work is diverse and wide-ranging. Moreover, new issues may arise suddenly that require immediate attention. Therefore, each of the OGC attorneys must function as a generalist, handling a wide range of matters. At the same time, because of the complexity of many of the legal issues faced

² The Central Services Advisory Committees are comprised of two deans, members of shared governance, and additional individuals with relevant expertise. They provide advice and oversight of the central service units.

³ The Budget Review Board consists of the UI deans, VPs, shared governance leaders, and other senior leadership. This group considers and approves requests for additional funding by central service units. The additional costs of these requests are incorporated into the budgets of the colleges and revenue-generating units.

by the University, OGC attorneys have also developed specialized areas of expertise. The principal roles of the OGC can be divided into the following categories:

1. Provide legal and policy advice and representation to the UI President, and to inform the President of legal issues and risks.
2. Provide legal advice and representation to UI administrators, faculty, and staff in their official capacities as employees of the University.
3. Represent the University in internal grievances and other legal matters (e.g. tenure and ethics disputes, student disciplinary matters).
4. Provide training on legal matters to the UI community.
5. Serve as the liaison with, and provide support for, the Office of the Attorney General.

Within these categories, the OGC works on a remarkably broad range of matters. In the area of litigation, the self-study indicates that there are typically more than 50 lawsuits pending against UI at any given time. The Office of the Attorney General signs all pleadings and tries the cases.¹ OGC lawyers and staff provide substantial support and actively assist in trial coordination and strategy. The OGC also provides this support in situations where outside counsel is hired. The OGC represents UI in matters before a number of state or federal administrative agencies (e.g. Iowa Civil Rights Commission, Department of Labor, Department of Health and Human Services, IRS) and provides counsel on a wide range of regulatory matters. In this regard, the OGC played a critical role and invested substantial time working with UI administration, FEMA representatives, and Iowa Homeland Emergency Management officials in response to the 2008 flood. OGC attorneys spend a significant amount of time on the creation of new and modified

policies and procedures, and in the interpretation of state and federal legislation and administrative rules. The OGC is also heavily involved in matters regarding financial transactions, tax issues, research compliance, and athletics. The OGC works closely with UI administrators on decisions and procedures regarding faculty and staff recruitment, hiring, promotion, tenure, post-tenure review, retention, discipline, and separation. It works with the Office of the Vice President for Student Life and the Office of the Provost on matters of student organizations, welfare, academic issues, and misconduct. The OGC contributes to public safety as part of the Threat Assessment Team and works with the UI Police Department in Clery Act reporting. The OGC works closely with the UI Transparency Office to manage the over 700 open records requests and open meetings issues received by UI. The OGC assists the Department of Athletics in matters of compliance and transactions/contracts. OGC attorneys sit on a large number of campus committees, and they spend a great deal of time meeting with administrative groups to provide legal background or advice. A full listing of the areas of law practiced by OGC attorneys is included in the OGC self-study (Appendix A, Exhibit A).

UI administrative leaders interviewed (Appendix B) and surveyed (Appendix C) by the committee were universal and effusive in their praise for the work of Vice President Reasoner and the OGC. Most of them consult with attorneys in the OGC on a frequent basis. They report that the legal work and advice provided by the OGC are high quality. Each of the attorneys and legal assistants is highly regarded. The attorneys provide their clients with options, they talk through potential outcomes/consequences, and they help them understand risks, but they do not make the final decisions. Vice President Reasoner and other OGC attorneys are highly accessible. They have an open-door policy and are approachable and responsive, even after

normal business hours. They strive to be customer-focused in their approach. It is clear that strong trusting relationships have developed between UI administrators and the OGC attorneys they typically consult.

Several administrators commented that the ability to walk down the hall to the OGC and talk with an attorney provides seamless communication, breaking down barriers to receiving timely legal advice. In this regard, it is important to note that many of its most frequent users are located on the same hallway in Jessup Hall as the OGC (Office of the President, Office of the Provost, Office of Finance and Operations).

Recommendation: Maintain the location of the OGC adjacent to the Offices of the President, Provost, and Finance and Operations (as administrative offices relocate on campus).

The principal challenges for the OGC stem from inadequate staffing and a lack of resources. As previously noted, the size of the UI OGC is very small in comparison with its peer institutions. Nearly everyone interviewed emphasized that while the office is outstanding, it is clearly understaffed. This is manifest in a number of ways. At times, OGC attorneys are unable to respond to issues and queries as timely and effectively as possible. This problem is particularly visible in situations where rapid document turnaround is required or when urgent matters arise suddenly. Work on other important but less urgent matters may be delayed, and clients are sometimes not kept informed of progress. It can be challenging for OGC staff to keep track of all of the active cases in an efficient way. Work often gets completed through heroic efforts by the attorneys and staff. OGC attorneys lack the “thinking time” necessary to address

systemic issues, craft and revise campus policies, and carry out necessary or vital campus training (e.g. DEO training, search committee training)—activities which can proactively prevent issues from arising. Because of the increasing volume and complexity of the work, and the serious consequences of adverse outcomes, the staffing shortage in the OGC poses significant institutional risk to UI.

Recommendation: Provide funding to hire at least two additional OGC attorneys. Consider hiring additional support staff as needed, although priority should be placed on hiring attorneys.

Recommendation: Consider purchasing a digital case management system to enhance workflow efficiency in the OGC.

Those interviewed by the committee identified additional legal threats. The public research university is a highly regulated environment with an enormous number of highly complex compliance requirements, and this situation is compounded by the presence of a large medical center. Moreover, compliance requirements are continuously changing. It can be challenging for OGC attorneys and other UI administrators to keep up with these changes, and there is substantial risk to compliance violations. At UI, the OGC consults on compliance matters, which are decentralized in a number of different locations. To coordinate these efforts and to centralize expertise, many campuses have created an Office of Compliance (under a variety of titles). Another threat is the increasing number of lawsuits and the sizes of verdicts awarded to defendants. In addition to monetary risk, these negative outcomes pose a threat to the reputation of the University.

Recommendation: Consider creation of a centralized Office of Compliance.

V. Relationship to attorneys outside the OGC

The six attorneys in the OGC provide the sole on-campus legal representation for the University (with the exception of attorneys representing UIHC, as described below). Although there are many other individuals on campus who hold law degrees (e.g. administrators, College of Law faculty), they do not report to the VP for Legal Affairs and General Counsel, and they do not represent the University in legal matters. Communications with them do not have attorney-client privilege. The OGC has formal or informal relationships with three groups of attorneys outside their office.

1. UIHC Attorneys

University of Iowa Healthcare has a legal office staffed by four attorneys. The office is directed by Joseph Clamon, Associate Vice President for Legal Affairs. He was appointed to this position in April, 2014. In this role, he reports to the Vice President for Medical Affairs (VPMA). This office functions independently of the OGC—there is not a formal reporting relationship between the Associate Vice President for Legal Affairs and the OGC or the UI President. The lawyers in this office specialize in matters related to health care and medical malpractice, and they provide legal services to administrators, faculty, and staff in UI Healthcare, the Carver College of Medicine, and University of Iowa Physicians. The office claims jurisdiction on all matters that arise from the health care enterprise and College of Medicine (including faculty academic matters).

Like the OGC, the lawyers in the UIHC office do not conduct litigation. The non-physician providers, nurses, staff, and hospital are represented in litigation by the Office of the Attorney General. In contrast, University of Iowa Physicians are represented in litigation by outside attorneys. This arrangement is related to a long-standing 28E Agreement that includes a self-funded insurance program for the first \$5 million in award or settlement per claim with a \$9 million aggregate per year. Because most medical malpractice lawsuits involve both physicians and non-physicians, litigation is typically conducted by both the Office of the Attorney General and outside attorneys functioning as co-counsel.

Although there is not a formal reporting relationship, the OGC interacts informally with the UIHC legal office in several ways. Vice President Reasoner and Associate Vice President Clamon meet regularly to share information and to facilitate collaboration on legal issues that cross boundaries between the two offices. The current leaders have established a good relationship between the offices and they share a strong commitment to working together. The offices also interact in the course of conducting work on a number of legal matters. For example, Gay Pelzer (Deputy General Counsel) handles a number of matters related to UIHC and UI Physicians. A portion of her salary is paid by UIHC (17%).

The lack of a formal reporting relationship between the UIHC legal office and the OGC is unusual when compared to peer universities that have integrated health care systems. This conclusion is supported by a review of outside OGC structures and by discussions with General Counsel at the University of Wisconsin and the University of Michigan. A more typical structure

incorporates attorneys that specialize in health care law within the reporting structure of the OGC, often under the supervision of a “deputy health care” general counsel who reports directly to the general counsel.

In the course of the review, several points were raised to support the current independent relationship between the OGC and the UIHC legal office. First, health care is a very specialized business, requiring specific legal expertise. Second, the size of the UIHC budget is similar to that of the rest of the University. Third, it is advantageous for the UIHC lawyers to be trusted advisors with a fiduciary responsibility to the VPMA and UIHC leadership. Finally, the Associate Vice President for Legal Affairs is in the best position to carry out performance reviews of the members of his office, since he supervises them on a daily basis.

The current structure also has weaknesses. First, it is sometimes not clear where the line is drawn between issues that are handled by the OGC and those handled by UIHC attorneys. Furthermore, some believe that this line is shifting—there is a perception that UIHC lawyers are beginning to take on some work that was handled by the OGC in the past. One example is College of Medicine faculty academic matters (e.g. promotion/tenure, misconduct, termination), which have traditionally been handled by the OGC (Deputy General Counsel Maria Lukas). However, in the UIHC legal office, there now appears to be a starting presumption that faculty matters are the responsibility of UIHC attorneys, even though they have less experience and expertise in these matters than the OGC. Whether and how to involve OGC attorneys is at the discretion of the UIHC legal office. Such an arrangement can lead to inconsistency in approaches

and outcomes. Several administrators noted that there were substantial differences in the approach to legal issues between the two offices.

Recommendation: Faculty academic matters should be handled by the OGC as a matter of course, regardless of the college. The OGC has a deep understanding of the relevant considerations and processes, and it can maintain consistency in approach across the campus.

Second, the lack of a formal reporting relationship between the UIHC legal office and the OGC has the potential to create situations where legal decisions are made without the knowledge or input of the Vice President for Legal Affairs/General Counsel and the President. Because of the nature of the work, UIHC risks are some of the highest risks on the UI campus. As a single legal entity, the risks associated with UIHC are ultimately the risks of the University. The interests of the University outweigh the interests of any individual unit. It is therefore critical that UI have a coordinated and coherent legal approach across the campus. In the current informal system, coordination is dependent on the relationship between the leadership of the OGC and the UIHC legal office, which could change with turnover in these positions. The interests of the University would be best served by a more formalized relationship between these offices, with greater authority of the Vice President for Legal Affairs to oversee and coordinate legal activities.

Recommendation: Consider implementing a dual reporting relationship for the Associate Vice President for Legal Affairs; this position would report to both the Vice President for Legal Affairs/General Counsel and the VPMA. Such a structure would formalize the communication

and oversight between the OGC and the UIHC legal office, and it would also preserve the trusted advisor relationship between the Associate Vice President for Legal Affairs and the VPMA.

2. State of Iowa Attorney General

The University of Iowa was established by the Iowa Constitution as an “instrumentality of the state.” As such, the University and its employees are represented in court by the Iowa Office of the Attorney General (OAG). The Board of Regents annually negotiate with the OAG for a fee to represent the Board of Regents and each Regent institution.

The Office of the Attorney General conducts most litigation for UI. They are assisted in the trial process by OGC lawyers in several ways. OGC lawyers contribute to assessment of risk, gathering and review of documents, interviews of witnesses, formulation of trial strategy, and research. OGC lawyers also frequently work with the Assistant Attorney General and staff during trial proceedings.

The OGC and the OAG have enjoyed a long collaborative and productive working relationship. Recent high-profile lawsuits (UI student organizations, UI Children’s Hospital construction, Athletics Department) have emphasized the importance of this relationship and the high degree of institutional risk that is at stake. The nature of this work, with court-imposed deadlines, requires rapid and seamless communication between attorneys in the OGC and the OAG. Because the relationship between UI and the Attorney General is under the purview of the Board of Regents, this committee did not review it in detail and we do not make formal recommendations. However, it is our opinion that understaffing in both the OGC and the OAG is

a barrier to effective communication between the offices. In addition, because of the small sizes of the OGC and OAG, it is not always possible to maintain a high level of expertise in some specialized areas of law. It may be beneficial to have procedures in place for the OGC and the OAG to retain outside legal counsel in situations where additional expertise or staffing is required. It is noteworthy that provisions for outside counsel are already in place in some specific situations (e.g. legal representation of UI Physicians, patent submissions).

3. Board of Regents

The Board of Regents is represented by staff attorneys within their office. They negotiate collective bargaining agreements on behalf of the Regent's institutions. They annually negotiate with the Attorney General for a fee to represent the Board of Regents and each Regent institution. It appears that there is a strong collaborative working relationship between the OGC and the Board of Regents attorneys.

VI. Conclusions and Recommendations

The OGC provides high quality legal service to the UI community on a broad range of issues. The OGC attorneys and legal assistants are talented and have strong and trusting working relationships with their clients. Vice President Reasoner provides exceptional leadership for the OGC and serves as a trusted advisor to President Harreld and other members of senior leadership. Challenges faced by the OGC are principally related to inadequate staffing and resources. Based on our review, the committee makes the following recommendations.

1. Provide funding to enhance opportunities for OGC attorneys to participate in ongoing legal training.

2. Maintain the location of the OGC adjacent to the Offices of the President, Provost, and Finance and Operations (as administrative offices relocate on campus).
3. Provide funding to hire at least two additional OGC attorneys. Consider hiring additional support staff as needed, although priority should be placed on hiring attorneys.
4. Consider purchasing a digital case management system to enhance workflow efficiency in the OGC.
5. Consider creation of a centralized Office of Compliance.
6. Faculty academic matters should be handled by the OGC as a matter of course, regardless of the college. The OGC has a deep understanding of the relevant considerations and processes, and it can maintain consistency in approach across the campus.
7. Consider implementing a dual reporting relationship for the Associate Vice President for Legal Affairs; this position would report to both the Vice President for Legal Affairs/General Counsel and the VPMA. Such a structure would formalize the communication and oversight between the OGC and the UIHC legal office, and it would also preserve the trusted advisor relationship between the Associate Vice President for Legal Affairs and the VPMA.

Appendix A

Office of the General Counsel

Self-Study

2019

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Introduction

To protect, uphold, and enhance its quality and to assure that units effectively support overall institutional aspirations, the University of Iowa regularly conducts reviews of its programs and services. In the case of the major university administrators, these reviews are conducted by an ad hoc committee of faculty representatives, and typically they cover both the office and its incumbent. These reviews have proven to be invaluable tools for assessment and improvement.

Mission and Overview of the Vice President for Legal Affairs

The mission of the Office of the General Counsel is to provide or coordinate effective legal services on issues facing all sectors of the University of Iowa, striving always to maintain the highest level of professionalism and integrity. We assist the University, its colleges, and departments in developing policies, practices, and procedures that reduce legal risk. We provide legal counsel, representation, interpretation and analysis on a broad array of substantive issues to administration.

The Office of the General Counsel serves the University and, as such, strives to enhance the University's mission and to further the achievement of the University's strategic goals. We represent the University of Iowa, including the President and Vice Presidents, University of Iowa Healthcare, and all of the schools and colleges on campus. Our office also represents individual faculty and staff in matters arising from their employment at the University. We do not represent faculty, staff or students in private legal matters. We are in the legal service business. We help the University fulfill its educational, research, and service mission in accord with the myriad legal and policy requirements applicable to public research universities. We are subject matter experts and problem solvers committed to helping our clients achieve their goals in a creative, practical and timely manner.

Organization and Financial Resources of the Office of the General Counsel

The Office of the General Counsel does not fit neatly into the model of a typical unit such as an academic college or department. We are a small legal firm with one client. Our basic function is service, primarily to the administration and faculty of the University. The office does not directly perform a teaching or research function, although the legal services provided and the regular adjunct and guest-teaching activities by attorneys in the office support these functions.

The current legal staff consists of the General Counsel, two Deputy General Counsels, three Deputy Counsels and two Legal Assistants. In the 10 years I have served as General Counsel, we have reduced the staff by 1.5 FTEs.

The annual budget for the Office of the General Counsel has remained flat at \$1,567,463 for the last two fiscal years. The budget only increased .01% in the prior two years before that. The budget covers salaries and the office expenses. The source of funds are general education funds.

Our office is small compared to our peer institutions. For example, Ohio State's General Counsel's office has 36 attorneys, University of Michigan 28, University of Illinois 27, Rutgers University 21, University of Minnesota 17, University of Wisconsin 12, with smallest numbers at Purdue, (recently established at

with 6 attorneys, but a local firm retains much of the legal work), and Iowa. Equivalent comparisons are difficult to make because our peer institutions are not alike. The universities differ in size, number of campuses, whether they are part of a system with system counsel as well, and other factors. Those with academic medical centers may count those attorneys within the General Counsel's office and not as part of the medical center. Some Universities are not defended by their state's attorney general and have either trial attorneys in the office or a team of attorneys overseeing outside trial counsel. At the University of Iowa, all of the litigation against the University or its employees for actions taken in the scope of employment is defended and handled by the Attorney General's office, unless there is a conflict and then outside counsel is retained. The Iowa Attorney General represents the University in litigation as a matter of state law. Even so, the General Counsel's Office is actively involved in litigation involving the University and works closely with university clients from initial discovery through trial or settlement and any appeal.

The reason that the attorney general represents us in court is because the University is considered an "instrumentality of the state." The University of Iowa is not a corporation or limited liability company and therefore has no articles of incorporation or bylaws. The University was created by a section of the Iowa Constitution of 1847, which stated, "There shall be a University of Iowa." The University is not a 501(c) (3) charitable tax-exempt corporation as many other colleges and universities are. The University is not a department of state government like the Department of Education or Department of Transportation. It is deemed to be an "instrumentality of the State of Iowa" governed by the State of Iowa Board of Regents. The Board of Regents is a state board created by Iowa Code Chapter 262 of the Iowa Code, has nine members and governs the three state universities as well as the School for the Deaf and the School for the Blind. As an instrumentality of the state, the University is subject to state laws such as open records and open meetings laws, state laws on employment and collective bargaining, and state laws regarding benefits. Gifts to the University are tax exempt under Section 115 of the Internal Revenue Code.

Services

This office provides a wide variety of services to the institution and its various components. A listing of the many substantive areas of the law in which the attorneys in the office practice is attached as Exhibit A. A considerable portion of the attorneys' time is devoted to meetings of various administrative groups where the attorneys may provide background or legal advice as issues arise in the course of discussion. This service affords these groups the benefit of a legal review at the beginning of a discussion regarding a course of action, before significant time and energy is invested in a decision that might require revision for legal reasons. A listing of the committees on which members of the office serve is attached as Exhibit B.

Our attorneys act as legal advisors and business advisors. We advise on not only what is permissible, but also what is desirable. The office does not keep track of the number of individual matters handled by the lawyers and legal assistants. A number would fail to capture the varying amounts of time necessary for any particular matter. One matter might require only a fraction of an hour of an attorney's time, whereas another could involve several attorneys over a period of months or even years.

Our attorneys serve as key members of senior leadership. Our office requires that all its attorneys be legally competent, have high ethical standards and integrity, excellent communication skills, the ability to think strategically and be trustworthy. All are excellent attorneys, hardworking and seeking to

advance the mission of the University. We strive to listen to the client's description of the desired result and reasons to achieve it. We work to communicate the background and framework of the laws affecting decisions, and collaborate on ways to achieve the goal or move toward the goal, assessing the risk of each decision.

Although the office is contacted for a myriad of reasons, including acting as a sounding board, certain areas require significant time and attention. Some of the areas on which we most frequently work are summarized in the following categories.

Litigation. Typically, there are over 50 lawsuits pending against the University, including the hospital. Cases range from breach of contract issues, tort cases, libel and defamation, wrongful termination, discrimination, injunctions, covenants not to compete, construction disputes, employment issues bankruptcy, Title IX, violations of open meetings and open records laws, estate disputes, negligence, trade secret, slip and falls, auto accidents, fraud, student organizations, malpractice and devise failure. Although the Office of the Attorney General signs all of the pleadings and tries the cases, this office is responsible for the interactions with the Attorney General's office and our faculty and staff. Our lawyers and legal assistants work closely with the AG's office regarding all aspects of litigation, including "litigation holds" to preserve relevant documents, gathering of evidence and documents, assisting in the preparation of discovery, working on interrogatories and requests for production, preparing witnesses, assisting in the trial coordination and strategy as well as legal research and writing. If the Attorney General cannot represent the University, outside counsel will be hired with the approval of the Executive Council of the State. In those cases, our office provides the same kind of assistance to the outside attorneys.

Before a lawsuit for a tort claim of personal injury or property damage can be brought against the State, including the University, claimants must first file a "tort claim" under Iowa Code Chapter 669. Our office then works with Risk Management, to investigate the University's legal exposure from them. Our office then assists the Attorney General's office to make decisions about settling these claims. If the claims are not settled or resolved, the claimants may proceed to file a lawsuit.

Administrative Agency Matters. The attorneys in OGC represent the University in a significant number of matters in front of federal or state administrative agencies such as Iowa Civil Rights Commission; EEOC investigations; disability claims; Title IX claims; FMLA complaints with the Department of Labor; age and disability discrimination with the Department of Health and Human Services; Internal Revenue audits; affirmative action; and wage and hour compliance issues.

Internal Dispute Resolution. Our office assists in representing the administration in faculty and staff (P&S and Merit) grievances, student disciplinary matters (misconduct and academic), and Athletic disciplinary and scholarship issues. We assist in mediations and settlement negotiations of claims presenting potential financial exposure.

Regulatory Compliance. A major research institution of higher education is one of the most heavily regulated entities. A matrix compiled by the Higher Education Compliance Alliance which lists key federal laws and regulations governing colleges and universities and be accessed on the web at <https://www.higheredcompliance.org/compliance-matrix/>. It includes a brief summary of each law compiled from publicly available government agency websites and relevant secondary sources.

Attorneys in the OGC frequently provide counsel in a wide range of regulatory matters for both federal, state and even some international legal matters. Areas of significant work in the compliance arena include administrative law matters involving HIPAA, OSHA, EPA, DNR, Copyright, Export Controls, FEMA, FERPA, Title VII, Title IX, and various conflicts of interest and research misconduct regulations tied to federal funding of research.

Civil rights. The OGC works with constituents across campus to understand and follow a wide range of civil rights statutes (including Title VII, Title IX, the ADA and its amendments, Section 504 of the Rehabilitation Act, and the Iowa Civil Rights Act) as well as a complex body of regulations. The attorneys in the OGC regularly provide legal advice to HR administrators, the Office of Equal Opportunity and Diversity, the Office of the Sexual Misconduct Response Coordinator, and other administrative units on these issues.

Human Resources. With over 25,000 employees, the University has many legal issues relating to human resources. Our office works on recruitment, hiring, promotion, retention, discipline and separation decisions and processes across campus.

Academic Matters. Our Office works closely with the Provost, Deans, and other administrators in colleges on faculty recruitment, hiring, promotion, tenure, post-tenure review, retention and disciplinary matters. We assist in the preparation, review and modification of policies and procedures relating to these matters.

Student matters. OGC attorneys work with the Office of Vice President for Student Life on matters relating to student government, student organizations, student welfare, student academic issues and student misconduct. We provide legal review upon request for the Provost Office regarding matters on internal appeals, and we prepare the “official record” and briefs representing the University position in matters appealed to the Board of Regents. Our attorneys also work with faculty and staff from various colleges and departments on affiliation agreements, memoranda of understanding, and other contracts and agreements necessary to provide internships, externships, and study abroad programs for students.

Public Safety. Our attorneys serve on the Threat Assessment Team, providing the core team with legal advice and counsel as needed. We work closely with the UI Police Department on meeting the requirements of reporting under the Clery Act.

Open Records. The OGC is involved with an ever-increasing number of open records requests and open meetings issues under state law. Last year over 700 requests were received and processed by the University. Attorneys in our office work closely with the UI Transparency Office to manage these requests. Four members of the office attend the weekly Open Records team meetings with others from Strategic Communication, UI Police, Health Care and Athletics to manage and address the responses. Records must be located and often reviewed for redactions or nondisclosure in compliance with various confidentiality and privacy laws. As the number of requests for records increases year after year and as individuals become more aware of the breadth of our Iowa law on public records, the number of documents, emails, electronic data and video recordings to be reviewed in order to protect confidential information continues to increase. The OGC is the office that prepares responses, files objections and negotiates resolutions with the new Iowa Public Information Board.

Policies and Procedures. Our attorneys spend significant amounts of time and effort in the development of new and improved policies and procedures by and for the University. In addition, the attorneys in office are regularly called on to review proposed state and federal legislation and administrative rules and to provide input on how these proposals will affect the operation of the University and what financial and administrative burdens they may impose.

Tax Issues. We work with Finance and Operations, and the Tax Manager on all types of tax issues. These range from daily operational questions about the applicability of the University's state tax exemption to complex issues presented by the University's business transactions.

Transactional Advice. Another major area of legal work for this office is in the transactions area. The University of Iowa has an operating budget of over \$4 billion dollars. While the bulk of those expenditures relate to salaries and benefits for UI employees, a considerable proportion also derives from an enormous number of financial transactions. Attorneys in the OGC have worked with offices across the University on systems to routinize much of the repetitive business in units such as Purchasing, Athletics, Risk Management, Environmental Compliance and Sponsored Programs. We have provided these units with additional training and templates, as needed to perform their work. However, new, complex and financially substantial agreements come to us on a steady basis for drafting, review or negotiation.

Historically this office has worked closely with the UI Business Manager. Since the flood of 2008 and the significant damages caused by the flood to many UI buildings, administration engaged this office on considerable complex real estate sales, purchases, and swaps, and rental arrangements outside of what had been previously routine UI transactions. In addition, the OGC works with Capital Management and Facilities Management on construction-related legal issues.

After the flood, the University, as a part of the state, qualified for public assistance funding under FEMA. Over the past 10 years, this office has spent significant time and effort in working successfully with UI administration on FEMA project worksheets and working effectively with FEMA representatives and Iowa Homeland Emergency Management officials to process the FEMA documents, including dozens of appeals and second appeals.

Research. The research operations across the University require legal attention due to the complexity and detailed regulatory requirements for animal, human subjects and product research. Our attorneys provide advice and assistance at multiple points throughout the life cycle of a typical research project, including assisting with research contract negotiations with sponsors and funding agencies, conflict of interest analysis, legal and regulatory analysis during weekly IRB meetings, assistance with sharing research data with other institutions and researchers, and support during audits by the FDA and other agencies. Other areas of focus include export control restrictions, intellectual property rights and technology transfer and commercialization of research efforts. Outside of the University's core research activities, our attorneys also support other units that report to the Vice President for Research such as the Environmental Health & Safety Office, State Hygienic Laboratory, Office of the State Archaeologist, and Pentacrest Museums.

Training and Teaching. The office attorneys cooperate regularly with others to assist in faculty, DEO and other staff training on various issues. This includes participation in the training presentation as well as legal counsel given during preparation of such presentation by others. Over the years, individual attorneys have taught courses and lectured as invited speakers in several of the UI's colleges. Such courses have been offered in the law school, the business school, and as freshman or graduate seminars.

Athletics. The University of Iowa is a Division I school participating in 24 sports governed by the NCAA and the Big 10 rules and regulations. Our office assists Athletics in compliance matters and transaction matters, including contracts for events and with coaches in the various sports.

Evaluation and Performance Appraisal

Evaluation of the VP for Legal Affairs and General Counsel is conducted annually by the President. All attorneys and legal assistants report to the VP and are evaluated yearly.

Relationship with Other Attorneys

UIHC attorneys. The University Hospital and Clinics have 4 attorneys specializing in healthcare and medical malpractice located in the hospital that provide legal services to the UI Health Care operations. The two offices have made great progress on collaboration and cooperation and now share a strong commitment to working together. The General Counsel and the Associate Vice President for Hospital Administration meet on a regular basis to share information and work collaboratively on legal issues that cross both arenas.

Other campus lawyers. The General Counsel's office (with UIHC attorneys on hospital matters) is the official voice on interpreting external laws and the legal ramifications of internal policies. A great many people holding law degrees also work at the University, outside the Office of the General Counsel and the Hospital's legal department. While the UI benefits from the legal training these individuals bring to their specialized administrative positions, these individuals are not engaged in the practice of law and do not represent the University in a legal sense. Communications by or with them do not have attorney-client privilege.

Attorneys in the Iowa Attorney General office and the Board of Regent office. By law, the Attorney General represents the University and its employees. Attorneys in the OGC do not regularly sign pleadings on behalf of the University or conduct hearings or trials. The office attorneys do assist in all aspects of the trial process including pre-trial risk assessment, gathering and review of documents, interviewing witnesses, strategy, assisting in research and at times working with the Attorney General's attorneys at trials.

The Board of Regents is our governing board and has attorneys on staff. The Board attorneys represent the Board of Regents and negotiate all collective bargaining agreements on behalf of the Regent's institutions. The Board of Regents negotiate annually with the Attorney General's office for a fee to represent the Board and each Regent institution. The attorneys at the University have a collaborative and good working relationship with the Board's attorneys.

Strengths, Weaknesses, Opportunities, Threats (SWOT)

Strengths

Staff. The attorneys and legal assistants in the Office are hardworking individuals committed to working collaboratively across the University to advance its mission. Their long-term commitment to this University is reflected in the many years of their continuous service. All OGC attorneys are by necessity generalists, yet each also is a specialist in particular areas. Individual attorneys have developed deep expertise in the subject matter areas of importance to the University. The combination of general and specialized expertise among the staff attorneys allows any one of them to address a new matter, while enabling specialized consultation availability within the office for matters of greater complexity or potential legal exposure.

Efficiency. Our legal staff is very small compared to peer institutions and compared to institutions with similar numbers of students, employees and annual budgets. OGC attorneys and legal assistants work hard to provide timely responses on all matters while balancing many competing demands for services. The office staff strive to be creative, affirmative partners to organizational leaders, using our skills to assist the institution to reach its strategic objective.

Ability to work collaboratively. Our attorneys work to make the law understandable and relevant to persons making decision at the University. They avoid unnecessary use of legalese and are willing to be involved in identifying legal issues as well as in developing solutions and compliant alternatives.

Weaknesses

The role of the attorneys in the Office of General Counsel is to provide legal advice but not to make the actual administrative decisions. The office embraces its role as legal counselor to the University and strive to preserve both its requirement to provide effective legal advice and to stop short of making the decisions. Preserving the boundaries of that role can be challenging at times, as others in the University community do not always understand legal counsel's role. The OGC attorneys regularly explain that they will evaluate the relative strengths, weaknesses, and risks of alternative courses of action, while the administrator's role is to make the ultimate determination on which course of action to pursue. The attorneys will continue to highlight this distinction when providing assistance to the various units.

Complexity and breadth. The breath and complexity of the many laws affecting public research institutions with a medical center is staggering. OGC attorneys, like those in higher education institutions across the country, strive to keep up with the development and evolution of the laws and decisions affecting the institution. The attorneys in the OGC work to maintain competencies through professional development opportunities, some of which are provided through professional organizations. While some of these may be available without cost, many of those pertaining to some of the most complex legal areas come at a cost and often include travel. Restricted funding has reduced OGC attorneys' participation in these opportunities.

Timeliness. Due to the complexity and enormous amount of legal work to be performed, the small staff of the office are not always as able to provide services as promptly as they would like. In addition, matters arise each day that require immediate attention and were not planned as activities in daily work efforts. Each attorney recognizes the respective priorities and often must triage those projects as effectively as possible.

Responsiveness. A consequence of having the Attorney General represent the University, with the fees paid by the Regents and reimbursed by the University is that employees, individual faculty and staff, at the University have no financial responsibility for legal issues. Individual faculty and staff have their priorities and sometimes it can be challenging to obtain the necessary documents, time commitment and flexibility in schedules to meet requirements for trial work and response to required demands, such as availability for depositions and trials.

Communication. One of the challenges for OGC attorneys when a new issue comes to our attention, is anticipating correctly which other administrators need to be informed and what can be shared due to certain confidentiality provisions. Particularly at the outset, it can be difficult to determine even which units ultimately will play a role in the matter. Having familiarity with the units can be helpful to identifying the appropriate administrators for such communication, but the unit might be unknown to us, or a higher-level administrator already is on the communication, making it seem unnecessary to include others when that might not be the case.

Opportunities

Increasing awareness of our services. We strive to improve utilization of our services by providing prompt and efficient responses to issues, managing expectations, and increasing the community's awareness of the office and the services that we provide.

Preventative work. Engagement of our office may benefit from working on preventive measures that might serve to obviate disputes in the future. The office may receive requests for advice when its involvement earlier in the process might have facilitated a better outcome or assisted in more effective documentation of the determination. Our attorneys work hard to make sure that decision makers understand the legal framework within which decisions must be made so that the next time a similar scenario arises; they are already aware of some of the legal challenges involved and can work preventively around them.

Threats

Increased workload. The number of matters handled, the complexity of the law, and the litigious nature of society, all lead to considerable increases in the workload for the office. Limited resources make it difficult to attend to all matters timely and effectively.

Exhibit A

Substantive Areas of the Law

Admissions

Advertising

Affirmative Action

Agency

Alcohol

Alumni Relations

Americans with Disabilities Act

Animal Research regulations

Arbitration (labor and construction)

Arrests

Assaults

Athletics including compliance with NCAA and BIG Ten rules

Automobiles

Bankruptcy

Bonds

Borrowing

By-laws

Civil Rights

Class Actions

Clery Act

Collective Bargaining

Communications laws

Competition with Private Enterprise

Competitive Bidding

Conflicts of Interest

Conflicts of Laws

Constitutional law including

1st amendment – speech, association, assembly, religion

4th amendment – search, seizure, privacy

11th amendment – federal jurisdiction immunity

14th amendment - due process, equal protection

Construction Contracts/Disputes

Contracts

Copyrights – grants and licensure, Fair Use, reproduction, registrations

Corporations

Criminal Law

Debt collection

Defamation

Discrimination – students and employees

Document production, interrogatory answers, deposition prep and trial prep

Domicile – residency for tuition determination

Drugs

Due Process

Easements

Employment – taxes, union contract negotiations and administration, discrimination, termination, grievances, pensions, other benefits, wages, wage assignments/garnishments, FLSA, Equal Pay Act

Environmental compliance

Estates

Ethics restrictions

Export Controls

FEMA

FERPA

Fraud

Freedom of Information Act

Gambling

Gifts – tax considerations, documents, policies

Governance

Grievance and grievance procedures

Guarantees

Hazardous wastes and substances

Health Benefits

HIPAA (privacy in health care)

Hospitals

Human subjects' research

Immigration

Indemnity

Independent contractors

Injunctions

Insurance

Internet – acceptable use and use agreements for software

Investment Document Review

Investments - statutory and other constraints, review Private Placement Memorandum

Judgments

Labor relations

Legislation

Libel

Licensing

Limitations of actions

Limited liability companies

Literary and artistic property

Litigation

Malpractice

Museums
Negligence
Nuisance
Open Meetings and Open Records
OSHA
Parking
Partnerships
Patents – ownership, licensing and infringement
Pensions
Placement and counseling
Policies – drafting, redrafting and interpretation
Political Activity
Principal and agent
Privacy
Private Foundations
Privilege
Process
Promissory Notes
Property – real and personal
Public Records
Publishing
Purchasing
Real Estate
Real estate transfers and acquisitions and sales tax
Regulations
Releases
Rentals/Leases
Research
Restitution

Retirement Benefits

Search and Seizure

Secured Transactions

Securities

Sexual harassment and discrimination

Slander

Social Security

Statutes – drafting and interpreting

Student matters – academic and disciplinary decisions, dismissals, discrimination, financial aid, grades, grievances, housing, organizations, residency, taxation of stipends/awards/fellowships, use of facilities

Subpoenas

Taxes – foreign, federal, state, city, income, estate, gift, excise, sales, use, intangible, property, UBIT

Technology transfer and protection

Telecommunications

Title IX

Title work

Torts

Trademarks – use and registration, cease and desist actions

Trespass

Trusts

Unfair competition

Unfair labor practices

Uniform Commercial Code, - sales, leases, security agreement, financing statement

Unrelated business taxable income

Use of facilities – peddling, religious groups, student groups, political acuties, campus bans

Usury

Waivers

Warranties

Withholding taxes

Witnesses and evidence

Work Study

Worker's compensation

Wrongful death

Zoning

Exhibit B

Committees on which members of the General Counsel's office are members or attend

Admissions Criminal Conduct Review Committee
Advisory Committee – Central Administration
Anti-violence Coalition
Athletics Compliance Staff Meeting
Biennial Drug Report Committee
Biosafety Level 3 Suitability Committee
Budget Review Board
Campus Events Committee
Campus Inclusion Team Advisory Committee
Clery Compliance Committee
Code of Student Life & Student Misconduct Procedure Review Committee
Competition with Private Enterprise Committee
Conflict of Interest in Research Committee
Disability Planning and Action Committee
Diversity Charter Committee
Dual Use Research of Concern Institutional Review Entity
Employment Practices Review Governance Council
Enterprise Risk Management
EU GDPR Policy Committee
Export Control Advisory Committee
FERPA Directory Information Committee
Fraud Triage Committee
Human Pluripotent Stem Cell Committee
Information Risk and Policy Council
Institutional Biosafety Committee
Institutional Review Board 01 Chairs Meeting
Institutional Review Board 01 Executive Committee

Institutional Review Board 02 Chairs Meeting
Intellectual Property Policy Committee
Iowa Measurement Research Foundation
Iowa Medical Mutual Insurance Company
Investment Steering Committee
Joint Development Committee with the University of Iowa Center for Advancement
Office of the General Counsel
Open Records Committee
Panel of Consultants, Mother's Milk Bank of Iowa
Path Forward Teams
President's Cabinet
Record Retention Review Committee
Research and Compliance & Administration Leadership Meeting
Senior HR Leadership Council
Shared Governance Corroding Committee on Inclusion and Campus Climate
Student Organization Recognition Committee
Sustainability Assessment Review Committee
Talent@Iowa Governance Council
Threat Assessment Team
Title IX Team Committee
Title IX 2018 Proposed Regulations Work Group
Trademark Licensing Committee
UI Branding Committee
UI Health Care Enterprise Practice Management Subcommittee
UI Health Care Legal Committee
UI Health Care Litigation Committee
UI Health Care Marketing and Communications
UI Health Care Risk Management Committee
UI Physician Board
UIP Executive Committee

Uncrewed Aerial System Advisory Committee
University Finance & Operations Senior Staff/Leadership
University of Iowa Research Foundation Board Committee
University of Iowa Research Park Board Committee
Vehicle Appeal Board Committee
Vice President for Research – Senior Staff Committee
Vice President for Research – Small Senior Staff Committee

Appendix B

Individuals Interviewed by OGC Review Committee

Bruce Harreld, President

Carroll Reasoner, Vice President for Legal Affairs and General Counsel

Melissa Shivers, Vice President for Student Life

Lois Geist, Associate Dean for Faculty Affairs and Development, Carver College of Medicine

Steve Fleagle, Associate Vice President and Chief Information Officer

Kevin Kregel, Associate Provost for Faculty

Cheryl Reardon, Chief Human Resources Officer and Associate Vice President

Jennifer Modestou, Director of Equal Opportunity and Diversity

Monique DiCarlo, Sexual Misconduct Response Coordinator and Title IX Coordinator

Terry Johnson, University Chief Financial Officer and Treasurer

David Kieft, University Business Manager

Debby Zumbach, Assistant Vice President and Director, Purchasing and Business Services

Peter Matthes, Senior Advisor to the President and Vice President for External Relations

Jeneane Beck, Assistant Vice President for External Relations

Daniel Clay, Dean, College of Education

George Carroll, Iowa Assistant Attorney General

Timothy Lynch, Vice President and General Counsel, University of Michigan

Maria Lukas, Deputy General Counsel

Gay Pelzer, Deputy General Counsel

Nathan Levin, Deputy Counsel

Ian Arp, Deputy Counsel

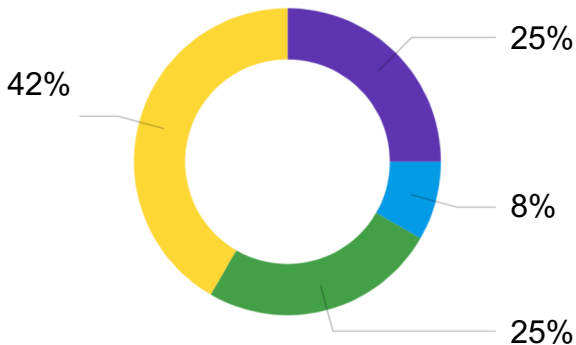
Ann Byrd, Deputy Counsel

Mary Cross, Legal Assistant

Jackie Kjaer, Legal Assistant

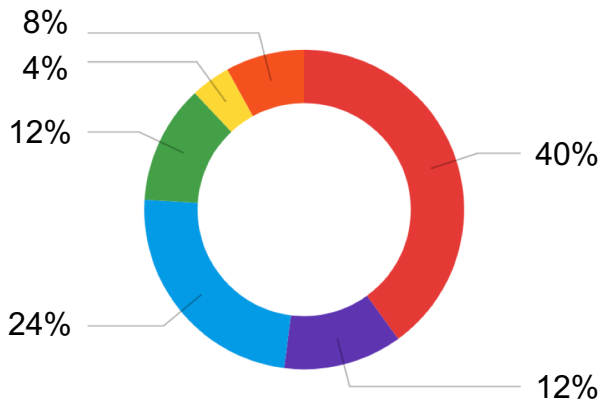
Appendix C- Survey Results

1) In your role as a UI administrator, how often have you worked with the Office of the General Counsel?



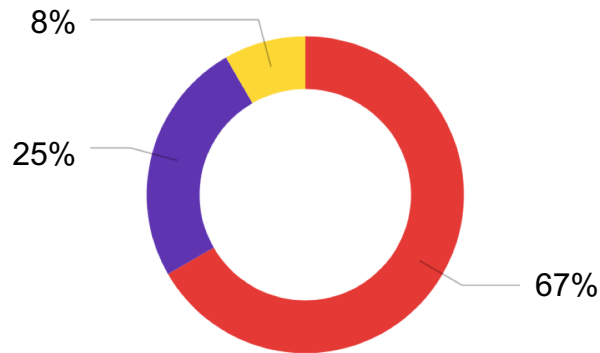
Never 1-2 times per year 3-5 times per year 6-10 times per year > 10 times per year

2) Which OGC lawyers do you commonly interact with?



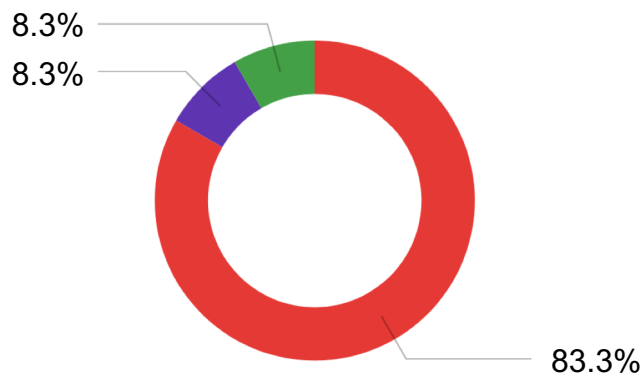
Carroll Reasoner Gay Pelzer Maria Lukas Nathan Levin Ian Arp Ann Byrd

3) In your role as a UI administrator, how often have you worked with UI Hospitals and Clinics lawyers?



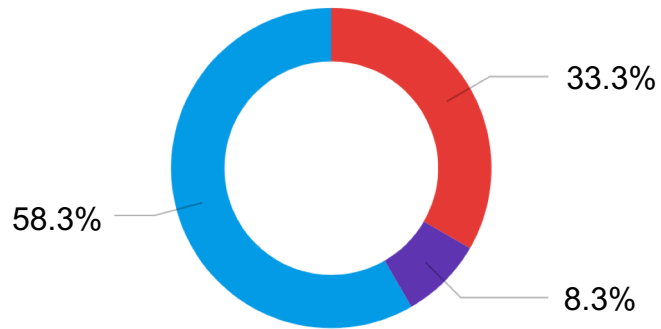
Never 1-2 times per year 3-5 times per year 6-10 times per year > 10 times per year

4) In your role as a UI administrator, how often have you used the services of lawyers out side the University of Iowa?



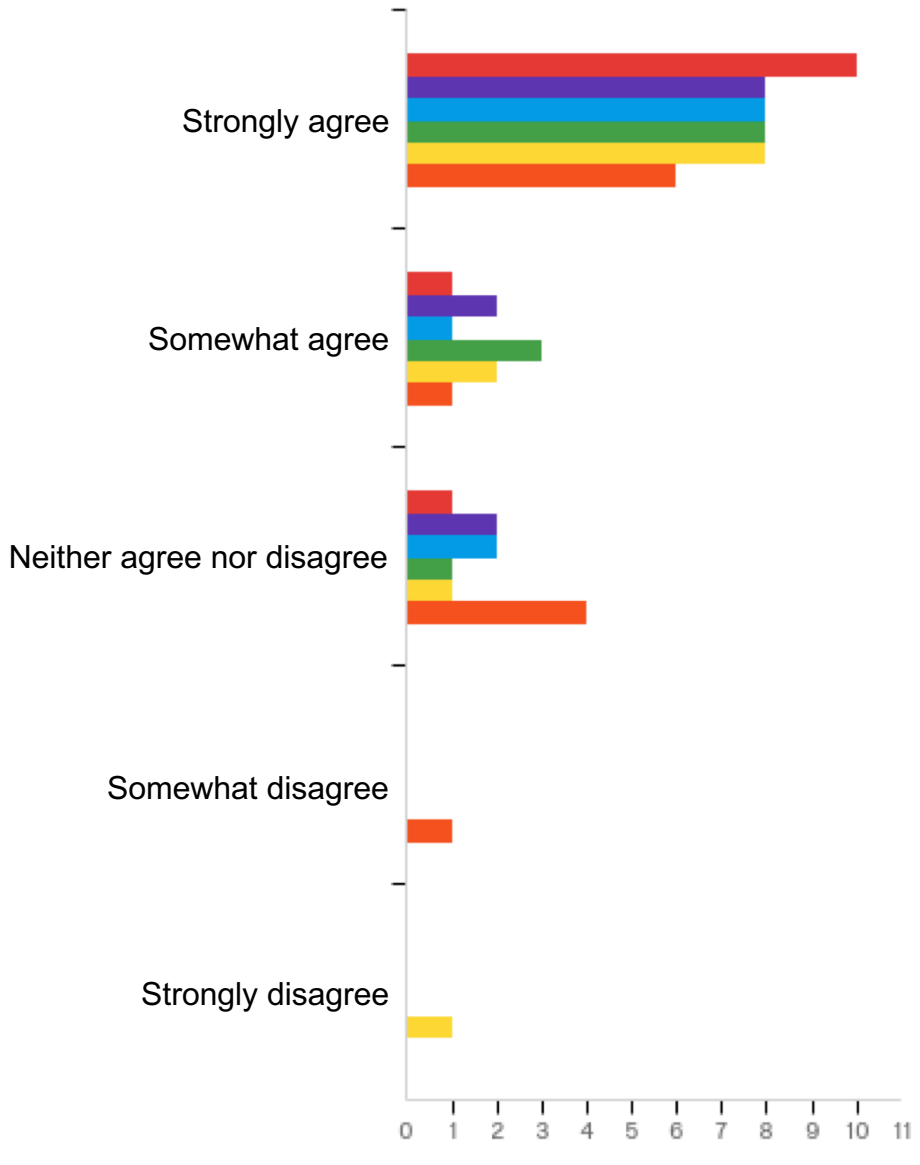
Never 1-2 times per year 3-5 times per year 6-10 times per year > 10 times per year

5) My interactions with the OGC are mostly--



- proactive, to prevent legal problems from arising
- reactive, in response to existing legal problems
- both proactive and reactive

6) Please rate the following statements



- The OGC helps me decide if I have an issue that requires legal assistance
- The OGC provides advice and options that allow me to decide on the best course of action
- The OGC is accessible and responsive to my needs
- The OGC keeps me informed of the progress of my legal matters
- The OGC strikes the right balance between risk aversion and the pursuit of innovation and opportunity
- The OGC provides sufficient education to the the campus regarding legal issues

7) What does the OGC do well?

- Outstanding group! Knowledgeable and accessible.
- Sound advice on complex matters.
- They are incredibly responsive. Gay has answered emails that I've sent at 8:00 on a Saturday night within an hour. Her advice is thoughtful, wise, and extremely helpful.
- Providing timely advice.
- Quick responsiveness; clear and lucid guidance, thoughtful oral and written advice.
- Advice.
- I find Carroll exceptionally thoughtful and responsive to UICA needs.
- OGC is very collaborative and responsive. I have been very happy with the level of service provided.
- Responsive and available.

8) What could the OGC do better?

- Same practices.
- Don't know.
- Be more creative and less conservative in solutions. Provide options.
- I haven't been here long enough to say. Really, Gay has done an excellent job meeting all of our legal needs.
- There have been some time lags recently, which I believe to be related to staffing.
- No suggestions; I am a sophisticated consumer and I have been impressed with every interaction so far.
- Be more independent of AG office.
- Manage Public Record Requests Better.