



Compliance, Audit, Risk Management and Legal Affairs (CARL) Committee
April 1, 2025
10:15 a.m.

Discussion Item

CARL-4 Federal, State, and UNC System Compliance Update

Background Information

Jerry Blakemore, Vice Chancellor for Institutional Integrity and General Counsel, Kristen Bonatz, Deputy General Counsel, and Enyonam Williams, Associate General Counsel, will provide an update on the significant legal, regulatory, and/or programmatic impact of recent federal, state, and UNC System compliance initiatives.

Attachment:

4.1 Presentation

Office of Institutional Integrity and General Counsel

Compliance, Audit, Risk Management and Legal Affairs Committee

April 1, 2025

Jerry D. Blakemore
Vice Chancellor for Institutional Integrity & General Counsel

Kristen S. Bonatz
Deputy General Counsel

Enyonam K. Williams
Associate General Counsel



AGENDA

- **What are the New Requirements?**
 - Federal, State, & UNC System Directives and Actions
- **How did UNCG Respond?**
 - Compliance Responses
- **What is the Impact?**
 - Research
 - Financial Aid
 - Other

RELEVANT EXECUTIVE ORDERS

Date	EO Number	Title	Current Status as of 3/10/2025
1/20/25	14151	Ending Radical and Wasteful Government DEI Programs and Preferencing	Mostly enjoined
1/20/25	14168	Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government	
1/21/25	14173	Ending Illegal Discrimination and Restoring Merit-Based Opportunity	Mostly enjoined by court, except EO 11246 remains revoked and investigatory authority remains
1/29/25	14188	Additional Measure to Combat Anti-Semitism	
1/29/25	14190	Ending Radical Indoctrination in K-12 Schooling	
3/6/25	14230	Addressing Risks from Perkins Coie LLP	
3/20/25	14242	Improving Education Outcomes by Empowering Parents, States, and Communities	

EO 14151: Ending Radical and Wasteful Government DEI Programs and Preferencing

President Trump issued EO 14151 "Ending Radical and Wasteful Government DEI Programs and Preferencing" on January 20, 2025.

- The EO directs any and all DEI programs throughout the federal government to be eliminated.
- The EO directs the Office of Personnel Management, with the assistance of the Attorney General, to review and revise all federal employment practices, union contracts, and training policies/programs.
- Per the EO, federal employee performance reviews shall reward individual initiative, skills, performance, and hard work.
- Reviews cannot consider DEI/DEIA ("Diversity, Equity, Inclusion, Access") factors, goals, policies, mandates, or requirements.

*Subject to preliminary injunction

EO 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity

President Trump issued EO 14173 "Ending Illegal Discrimination and Restoring Merit-Based Opportunity" on January 21, 2025.

- The EO expressly revokes Executive Order 11246, a Civil Rights era EO with the stated intent to ensure nondiscrimination in federal contracting.
- The EO also warned private employers and institutes of higher education against implementing and maintaining "illegal DEI programs."
- The EO also requires the Office of Federal Contract Compliance Programs to "immediately cease" the following:
 - Promoting "diversity;"
 - Holding federal contractors and subcontractors responsible for taking "affirmative action;" and
 - Allowing or encouraging federal contractors and subcontractors to engage in workforce balancing based on race, color, sex, sexual preference, religion, or national origin.

***Subject to partial preliminary injunction**

U.S. Dept. of Education Office for Civil Rights

February 14, 2025 Dear Colleague Letter and February 28, 2025 F.A.Q.

Maintains the U.S. Supreme Court's holding in *Students for Fair Admissions v. Harvard and UNC* that colleges are prohibited from using race as a factor in admissions should be applied more broadly to:

- admissions
- hiring, promotion, compensation
- financial aid, scholarships, prizes
- administrative support
- discipline
- housing
- graduation ceremonies
- and "all other aspects of student, academic, and campus life"

EO 14168: Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government

President Trump issued EO 14168 "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government" on January 20, 2025.

- The EO redefines the way the federal government approaches issues of gender, focusing on traditional understandings of biological sex.
- Federal agencies are directed to revert to the use of "biological sex" as the defining criterion for policies related to sex-based rights and protections.
- The EO emphasizes the protection of women's rights in spaces that are legally designated for women, such as women's sports, shelters, and single-sex prison facilities.

EO 14188: Additional Measure to Combat Anti-Semitism

President Trump issued EO 14188 "Additional Measure to Combat Anti-Semitism" on January 29, 2025, building on EO 13899, which President Trump issued in 2019.

- Enhances policy of the United States to combat anti-Semitism vigorously, using all available and appropriate legal tools
 - prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.
- Requires reports of inventory of all pending administrative complaints involving institutions of higher education alleging civil-rights violations related to or arising from post-October 7, 2023, campus anti-Semitism.

UNC System Guidance

Taken comprehensive steps to move towards “institutional neutrality”

Spring 2023: Compelled speech

August 2023: Directives related to Supreme Court affirmative action case, *Students for Fair Admissions, Inc. v. Harvard and UNC*

May 2024: Equality Policy

UNC System Actions:

- Equality Policy: May 2024
 - Replaced diversity and inclusion policy
- Suspension of DEI-related Course Requirements
 - February 5, 2025 Memorandum from Andrew Tripp Regarding Federal Contracting Compliance
 - In response to EO 14173
 - Directed institutions to suspend general education or degree-specific mandatory DEI course requirements

Compliance with UNC System Office Guidance



Actions Taken:

- Removed certain phrases from UNCG webpages
- Reviewed required coursework
- Assessed research grants and student scholarship restrictions
- Reviewed job postings

Monitoring Potential Impact on Federal Financial Aid for UNC Greensboro Students



How will the federal government handle?

- Management of Student Loans
- Disbursement of Federal Aid
- Oversight of Pell Grants

QUESTIONS?

