

Report to CSU Board of Trustees
November 8, 2023

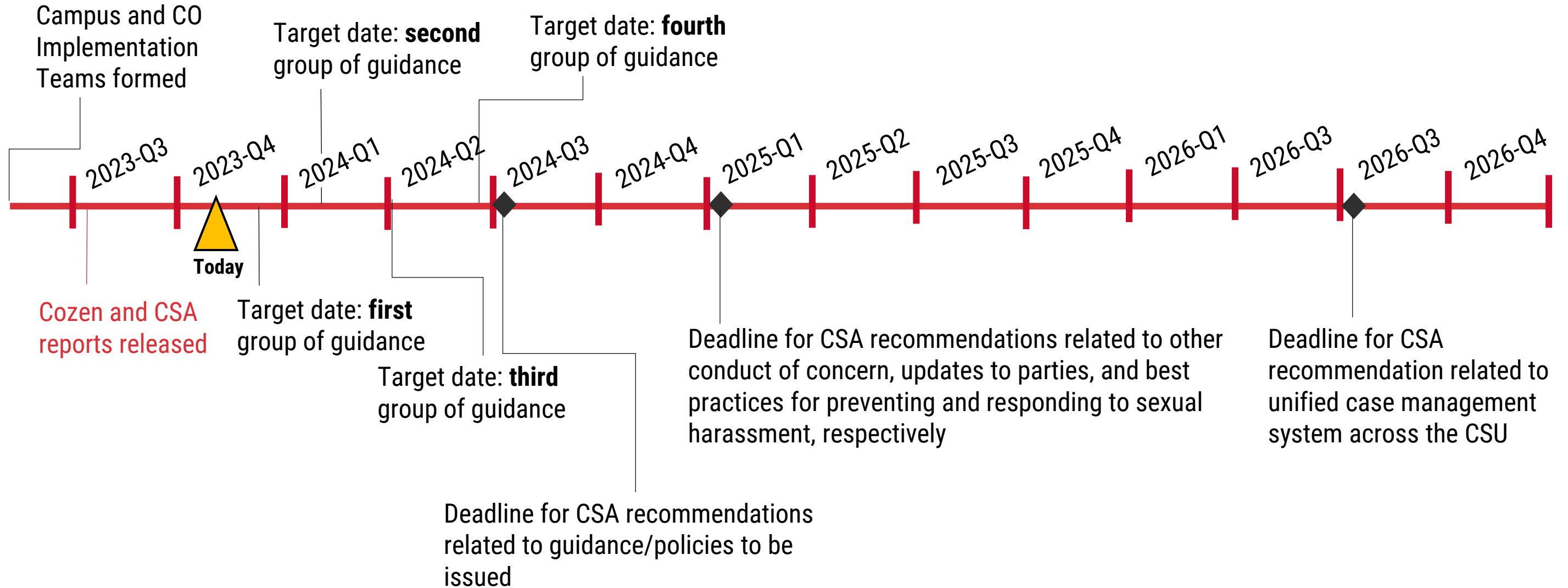
Update on Civil Rights (Title IX and Other Nondiscrimination) Programs and Services

Vice Chancellor for Human Resources Leora Freedman






[CSU Commitment to Change website](#)



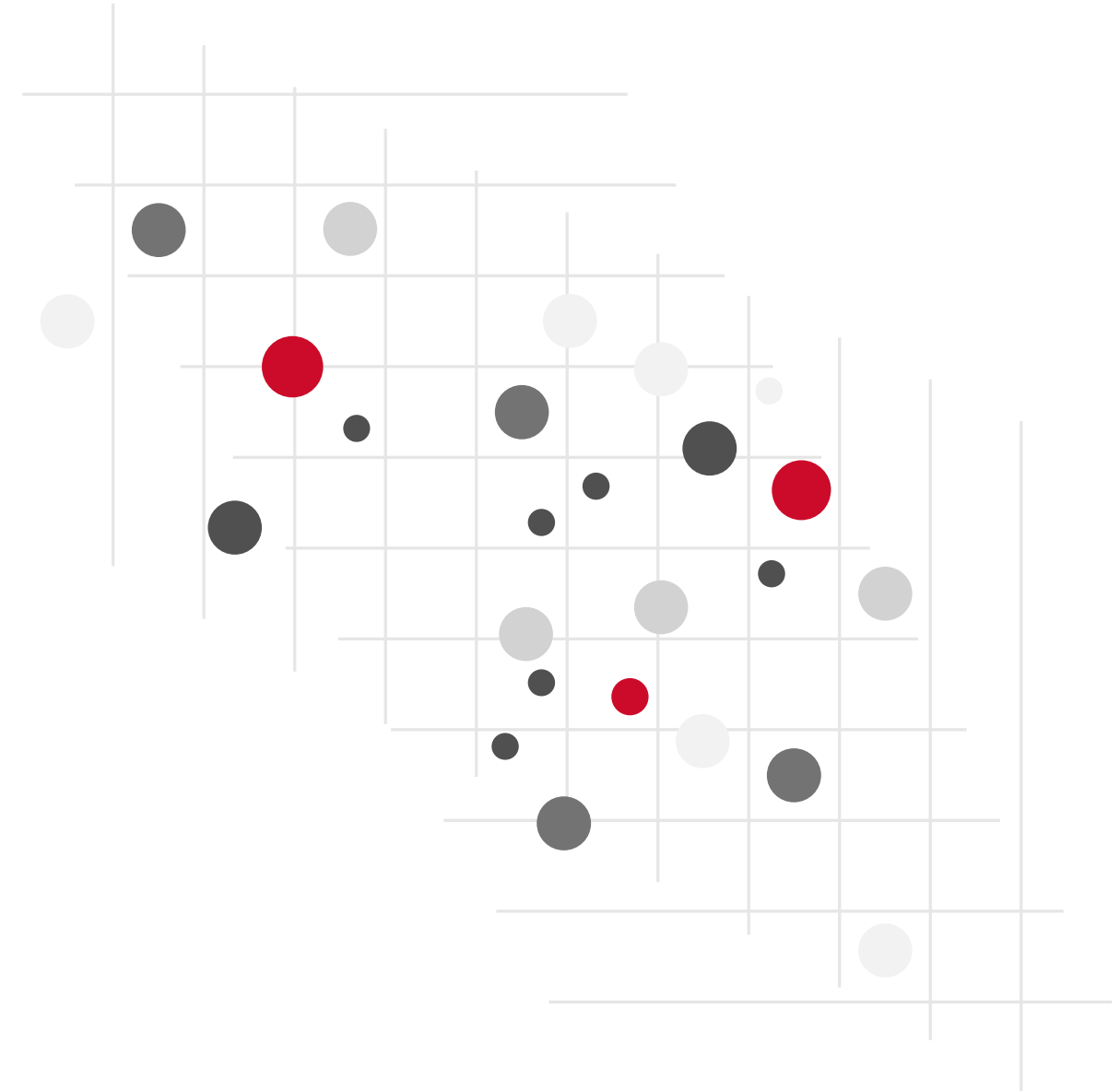
IMPLEMENTATION TIMELINE – AS OF NOVEMBER 2023



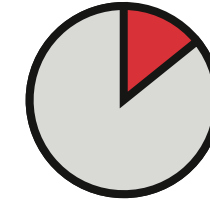
IMPLEMENTATION CATEGORIES

1. Building Chancellor's Office Infrastructure 
2. Establishing Systemwide Standards 
3. Supporting University-Level Implementation Teams 
4. Increased Oversight of University Title IX/DHR Programs 
5. Leading Other Key Initiatives 

1. Building Chancellor's Office Infrastructure



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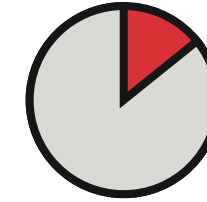
Key Actions To Date

- Held three-day project planning summit
- Designed structure for new Chancellor's Office Civil Rights Division
- Recruitment for Associate Vice Chancellor for Civil Rights (in progress)
- Received approval to add civil rights specialists in the Office of General Counsel

Next Actions

- Recruit for open positions in Civil Rights Division
- Form investigator pool to meet immediate needs; develop quality assurance protocols

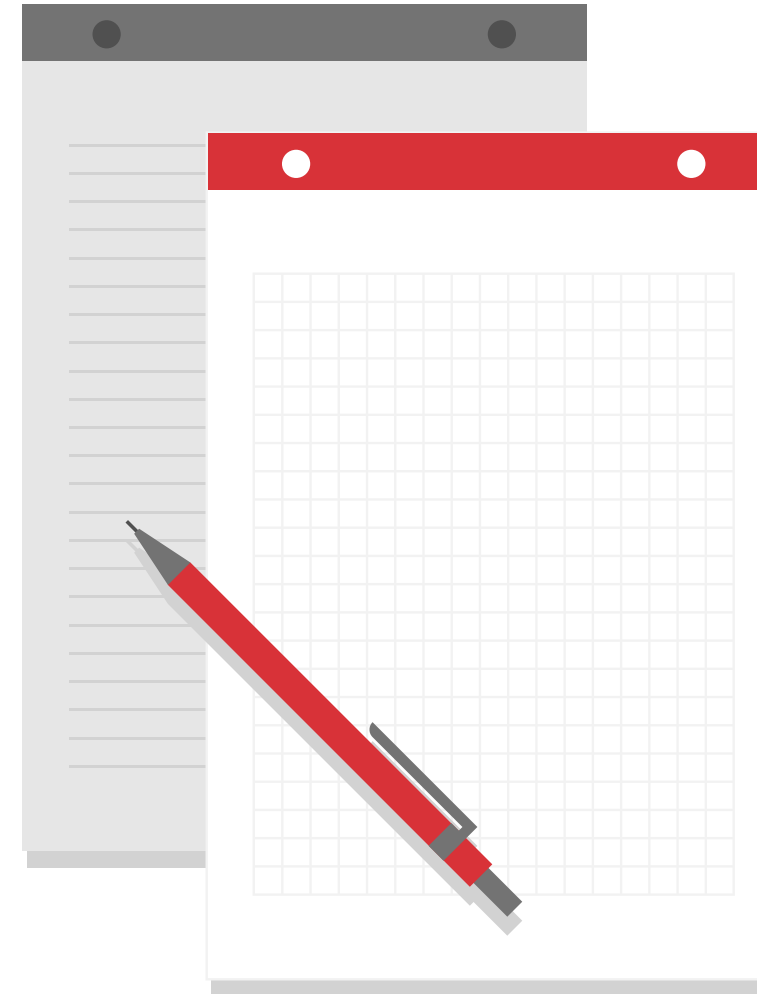
1. Building Chancellor's Office Infrastructure



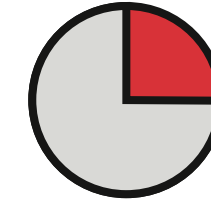
Challenges

- Concurrent searches at other institutions nationwide
- Funding to support expansion of Civil Rights Division
- Campus Title IX and DHR staff departures (compensation and other factors) requires additional immediate support from the Chancellor's Office

2. Establishing Systemwide Standards



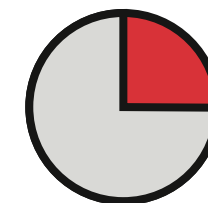
2. Establishing Systemwide Standards



Key Actions To Date

- Issued intake and initial assessment protocols to standardize operations
- Developed standards for oversight and elevation of concern to the Chancellor's Office
- Preparing additional guidance to be issued in the next 90 days, priorities identified in July reports

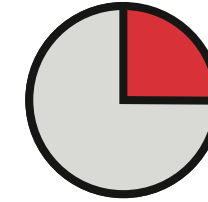
2. Establishing Systemwide Standards



Next Actions

- Issue guidance (within 90 days)
 - *Initial assessments*
 - *Communications with parties*
 - *Policy interpretation*
 - *Documentation and recordkeeping checklist*
 - *Data tracking protocols*
 - *Multi-disciplinary teams*
 - *Continued Title IX/DHR oversight of disciplinary outcomes*
- Prepare additional guidance to be issued 2024-Q1 and Q2
 - *Structure of analyses and determinations*
 - *Tracking key dates and timeline extensions*
 - *Policy interpretation*
 - *Disciplinary/corrective action*
 - *Analyses and outcomes*
 - *Other conduct of concern*
 - *Information resolution*
 - *Prevention and response*
- Establish Systemwide Director model and standardize oversight protocol

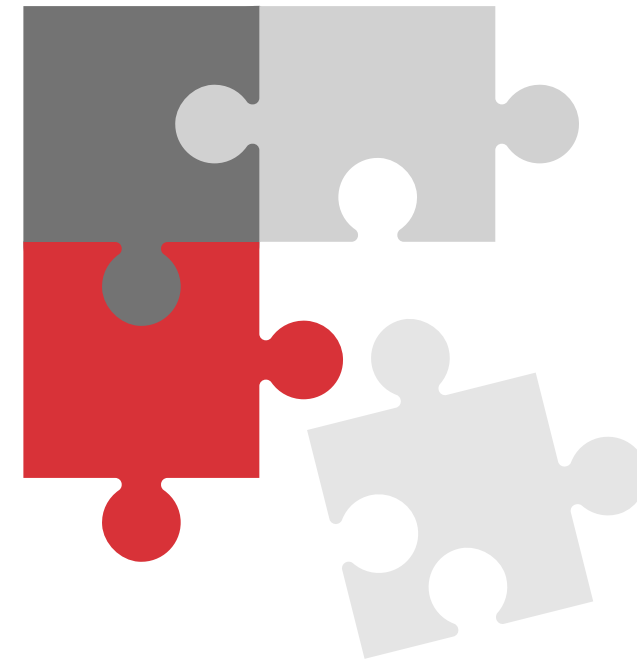
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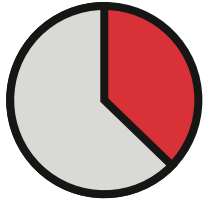
Challenges

- New Regulations (and standards) from Office for Civil Rights of Department of Education and new California laws
- Harmonizing laws and regulations
 - federal laws
 - state laws
 - collective bargaining agreements (discipline process)
- Engagement and collaboration across multiple constituencies

3. Supporting University- Level Implementation Teams



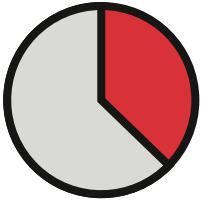
3. Supporting University-Level Implementation Teams



Key Actions To Date

- CO Liaisons facilitated separate meetings with each iTeam and Cozen O'Connor
- Received communications plans from each university iTeam (as of October 27, 2023)
- Preparing to receive project plans from each university (due on December 15, 2023)

3. Supporting University-Level Implementation Teams



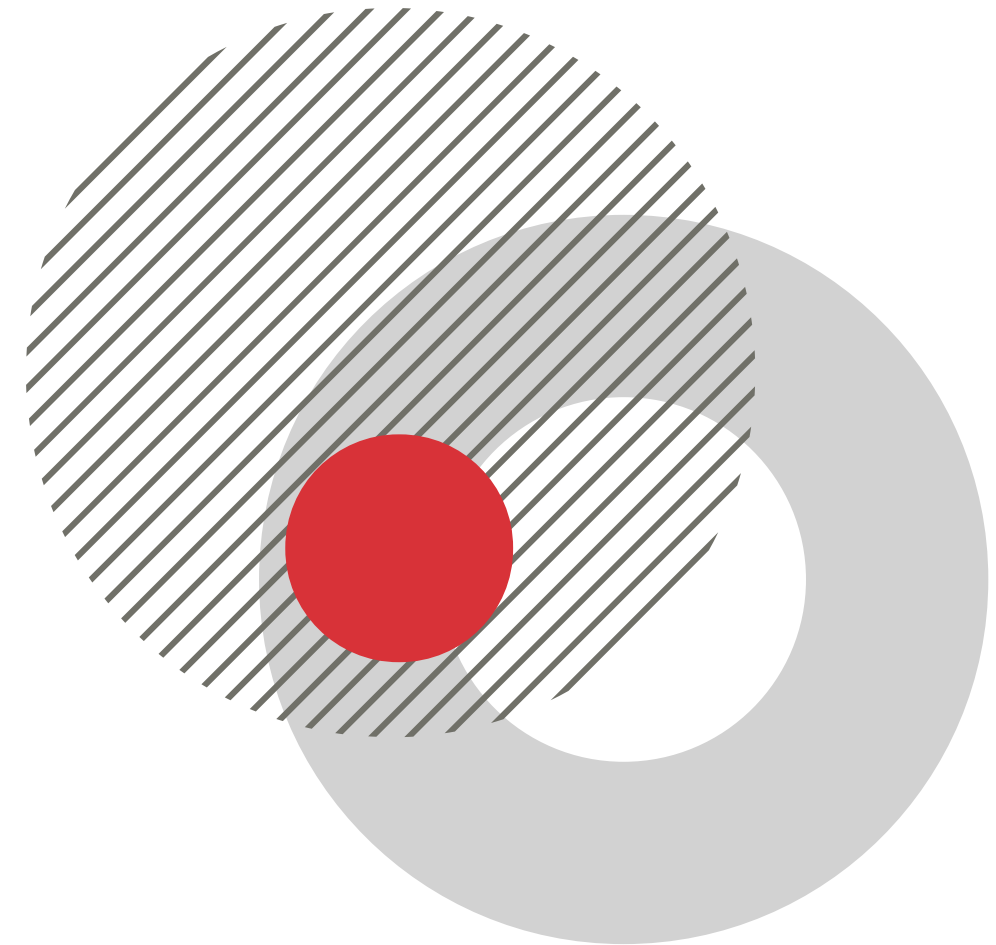
Next Actions

- Review iTeam communications plans (current to mid-November 2023) and project plans (mid-December 2023)
- Continue to provide support to campus iTeams

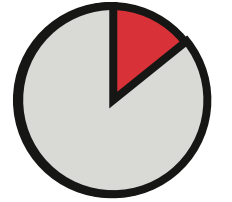
Challenges

- Title IX Coordinators/DHR Administrators bandwidth (carrying significant responsibilities for ongoing Title IX/DHR program operations during implementation planning process)
- University budget constraints, competing priorities
- Lack of campus community awareness of iTeam existence, composition, purpose, and goals

4. Increased Oversight of University Title IX/DHR Programs



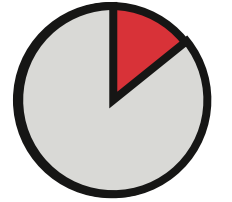
4. Increased Oversight of University Title IX/DHR Programs



Key Actions To Date

- Real-time reporting and review of cases by the Chancellor's Office for cases
- Gathering baseline data on open/pending Title IX/DHR cases and status
- Initiated process for early-stage case reviews and prompt elevation of concerns to the Chancellor's Office
- Providing additional oversight and support for universities experiencing unanticipated Title IX/DHR staff departures (ongoing)

4. Increased Oversight of University Title IX/DHR Programs

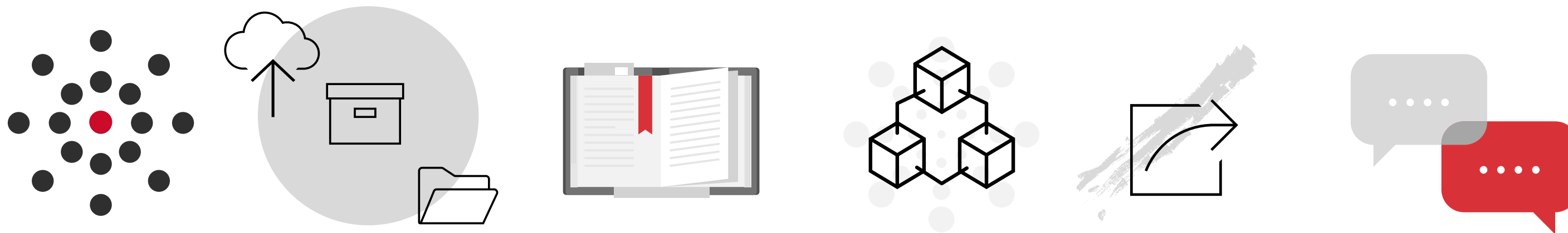


Next Actions

- Develop protocols to ensure consistent use of systemwide templates and tools
- Issue revised Title IX and DHR Annual Survey for consistent data gathering and reporting

Challenges

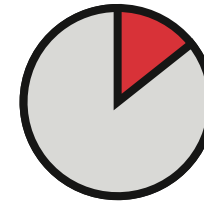
- University Title IX and DHR staff departures; gaps in pipeline to fill positions
- Different systems and protocols for case management and documentation across campuses
- Need more CO infrastructure to support oversight of university Title IX and DHR programs during recruiting and onboarding.



5. Leading Other Key Initiatives

- Centralized Reporting
- Unified Case Management System
- Prevention, Education, Training and Professional Development
- Center for Investigations and Resolutions
- Other Conduct of Concern
- Systemwide Communications

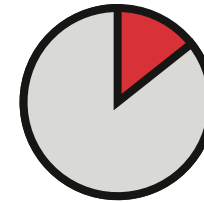
5. Leading Other Key Initiatives



Key Actions To Date

- Launched SharePoint with key resources and information for university civil rights staff
- Developed Chancellor's Office communications plan
- Issued first CO monthly update for University Civil Rights Staff
- Developing written guidance about Other Conduct of Concern
- Revising Retreat and Reference Policies

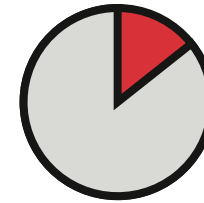
5. Leading Other Key Initiatives



Next Actions

- Finalize revised Retreat and Reference Policies for board review
- Finalize guidance on addressing other conduct of concern
- Systemwide Directors assume new roles
- Develop RFP for centralized records management system
- Develop systemwide coordination of prevention education programming
- Develop plan for centralized investigative services

5. Leading Other Key Initiatives



Challenges

- Different case management systems and protocols across campuses
- CO infrastructure currently insufficient to undertake centralization of investigations and resolutions
- CO infrastructure currently insufficient to coordinate prevention programming across universities

Steps Taken at Our Universities – Examples

- Created and filled new positions (intake coordinator; prevention education coordinator; outreach and restorative justice coordinator)
- Formed multi-disciplinary teams
- Separated intake from investigation roles
- Developed user-friendly guidance materials and FAQs
- Improved use of existing case management systems and practices
- Campus-wide restorative circle (build relationships; strengthen internal protocols, communications, prevention education, and address Other Conduct of Concern).

The CSU Civil Rights Implementation Oversight Committee

Charge: to ensure that the recommendations of Cozen O'Connor's systemwide Title IV assessment and the California State Auditor's report are appropriately and efficiently implemented, and with transparency and accountability.

Membership

Chair	Dilcie Perez , Deputy Vice Chancellor, Academic and Student Affairs and Chief Student Affairs Officer
Trustees	Lillian Kimbell Leslie Gilbert-Lurie
Presidents	Steve Perez , Chico State Vanya Quiñones , CSU Monterey Bay
Academic Senate	Beth Steffel , Chair, Academic Senate of the California State University & Chair, The Intersegmental Committee of the Academic Senates
CSSA	Genesis Galilea Pompa , Vice President of Systemwide Affairs, Student Cal Poly Pomona
Campus Representatives	Al Liddicoat , Vice President for University Personnel and Chief Human Resources Officer, Cal Poly San Luis Obispo Jessica Rentto , Sr. Associate Vice President, Administration, San Diego State
Staff	December Bolden , Assistant Vice Chancellor and Chief of Staff, Office of General Counsel