CALIFORNIA STATE UNIVERSITY
SAN BERNARDINO

IMPLEMENTATION PLAN

In Response to Cozen O'Connor's Title IX and Discrimination,
Harassment, and Retaliation (DHR) Assessment

PREPARED BY

University Implementation Team | October 2024

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INTRODUCTION

The California State University (CSU) Board of Trustees engaged Cozen O'Connor in March 2022 to conduct a systemwide assessment of its Title IX and Discrimination, Harassment, and Retaliation (DHR) programs to strengthen its systems of care and compliance, following high-profile reports of sexual harassment and other misconduct within the CSU.

The Cozen O'Connor team visited all 23 campuses and the Chancellor's Office headquarters between July 2022 and April 2023, and administered a systemwide survey that garnered nearly 18,000 responses between December 2022 and February 2023. A report identifying core observations and recommendations for improvements at both the system and university levels was shared system-wide on July 17, 2023.

California State University, San Bernardino ("CSUSB") received its individualized campus report on July 17, 2023, as well as information from a separate system-wide audit conducted by the State. These reports have become a roadmap to guide our efforts. Upon receiving the recommendations from Cozen O'Connor and the Chancellor's Office, CSUSB created an Implementation Team to evaluate, assess, and implement the Cozen O'Connor recommendations at CSUSB. The team launched a website dedicated to cataloging the team's plan and progress.

IMPLEMENTATION TEAM

To facilitate the implementation of recommendations, CSUSB formed the Implementation Team, which is specified below, to serve as an advisory, communications, and working group. Pursuant to guidance from the Chancellor's Office, our Implementation Team includes the Title IX Coordinator / DHR Administrator as a subject matter expert; representative members of staff, faculty, and student leadership, to provide community perspective and have visibility into progress on the recommendations; and, a member of senior leadership, who can assist with securing resources, removing operational roadblocks, and aligning institutional priorities.

The members of the CSUSB Implementation Team include:

- Robin Phillips   Co-Chair, Vice President   Human Resources
- Steven Vasquez   Co-Chair, Title IX Coordinator   Institutional Equity & Compliance
- Vacant   Co-Chair, Assoc. Vice President   Human Resources - Operations
- Vacant   Training & Learning Systems Specialist   Risk Management
- Kelly Campbell   Vice Provost   Academic Programs
- Claudia Davis   Faculty Senate Chair   Faculty Senate
- Vacant   Director, Academic Labor Relations   Faculty Affairs and Development
- Carson Fajardo   ASI President   Associated Students Incorporated
- Vacant   AVP and Dean of Students   Student Affairs - Office of the VP
- Vacant   Associate Provost   Faculty Affairs and Development
- Bryan Haddock   Chief of Staff   President's Office
- Claudia Ochoa   Confidential Campus Advocate   Counseling & Psych. Services

- Jennifer Moulton   Director of Psychological Services   Counseling & Psych Services
- Lisa Root   Associate Dean of Students/Director   Student Conduct
- Alisha Beal   Exec. Director, Employee and Labor Relations   Human Resources

UNIVERSITY DEMOGRAPHICS AND POPULATION

The chart below reflects key metrics and demographic information for CSUSB, as provided in the Cozen O'Connor report.

CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO		
Location Information		
Location: San Bernardino, CA (pop. 220,328)	**County:** San Bernardino County (pop. 2,193,656)	**Locale Classification:** Midsize City
University Information		
President: Tomás D. Morales Ph. D. (May 2012-present)		
Designations: Hispanic Serving Institution (HSI)		
Enrollment		
Total Number of Students	18,510	
Student Ethnicity		
White	11%	
Hispanic/Latino	69%	
Asian	6%	
Two or More Races	2%	
Race and Ethnicity Unknown	4%	
Black/African American	5%	
International Student	3%	
Native Hawaiian/Other Pacific Islander	0%	
American Indian/Alaska Native	0%	
Instructional Faculty		
Total Number of Faculty	1,101	
Tenure-Track	41.2%	
Lecturer	58.8%	
Percent Full-Time	49.18%	
Percent Part-Time	50.82%	
Staff		
Total Number of Staff	957	
Percent Full-Time	98.43%	
Percent Part-Time	1.57%	

PROGRESS TO DATE

In the Fall 2023 semester, the team worked on the strategies and tactics reflected in the following plan. While comprehensive, it is also the intention of the Implementation Team to continually adapt this plan as needed based on campus feedback, the changing landscape of regulations that guide this work, including federal Title IX expectations, and additional opportunities for improvement that may be realized moving forward.

Given the urgency and value of the necessary improvements, the University and Implementation Team have already started taking action in several areas. Progress to date includes:

- Hired the newly created position of Prevention Outreach and Education Manager (*POEM*) in January 2024, housed in the office of Institutional Equity and Compliance ("IEC" - Title IX and DHR Office).
- Procured a Case Management System with an anticipated implementation and active use by the close of the Fall 2024 semester.
- Established a Student-Focused Multidisciplinary Team (MDT) and a Staff/Faculty-Focused Multidisciplinary Team (MDT). The MDTs have a regular meeting schedule with standing and "ad-hoc" members (invited as appropriate).
- Established a satellite office presence in a more central location (Student Union South) to increase accessibility and visibility of Institutional Equity and Compliance to students.
- Initiated website review and analysis, identifying the need for survivor/user-focused language and interface, and implementing continuous updates.
- Completed overhaul and planned programming for the IEC social media campaigns.
- Modified organizational structures to address Other Conduct of Concern (OCC).
  - Added two positions to the Employee and Labor Relations Department to centralize an increased efficacy in addressing OCC by staff and faculty.
- Increased IEC participation in resource fairs, workshops, first-year and transfer orientations, and various presentations. Procured brochures, handouts, and materials with IEC branding.

We are all dedicated to making CSUSB a place where everyone is safe and respected. We know these changes—some big, some small—will take time, but our commitment to seeing them to fruition is unwavering; we want to ensure that our campus is the best it can be for everyone. With the creation of this plan, we will continue the significant work to put Cozen's recommendations into action. Our deepest gratitude is extended to the Implementation Team and every individual who engages in this impactful work. It's going to take all of us—students, faculty, and staff—working together to create the change we want and need to see.

PLAN SUMMARY

The Cozen O'Connor recommendations for CSUSB are divided into five areas: 1) Infrastructure and Resources; 2) Strengthening Internal Protocols; 3) Communications; 4) Prevention, Education, Professional Development, Training, and Awareness; and 5) Responding to Other Conduct of

Concern (where "Other Conduct of Concern" refers to reports of conduct that fall outside of the Nondiscrimination Policy).

The sections are summarized as follows:

A. **Infrastructure and Resources** key areas include budget allocation for external resources and campus advocates, evaluating the IEC office location for a trauma-informed environment, reviewing staffing needs across relevant offices, fulfilling training and development for Title IX/DHR employees, procuring a case management system, and establishing a supervisory model for the Title IX/DHR office. These efforts aim to ensure a comprehensive framework for campus well-being.

B. **Strengthening Internal Protocols** initiatives include mapping the Title IX/DHR case resolution process, developing intake and case management protocols, strengthening campus collaboration through a multidisciplinary team model, evaluating barriers to reporting, ensuring the Title IX Coordinator / DHR Administrator remains involved in disciplinary processes, and developing a system for collecting post-resolution feedback. These efforts are designed to improve the overall effectiveness and responsiveness of the Title IX/DHR program.

C. **Communications** emphasize effective outreach and informing the campus community about implementation progress and Title IX and DHR through various modalities, such as documenting a process for distributing nondiscrimination notices, utilizing the Prevention, Outreach, and Education Manager, updating communications, and forming a committee for communication review.

D. **Prevention, Education, Professional Development, Training, and Awareness** outlines actions related to developing evidence-based educational programming, ensuring compliance with VAWA provisions, and fostering a campus culture of inclusivity and respect.

E. **Responding to Other Conduct of Concern** provides for processes to establish expectations for "other conduct of concern," building programming, identifying competencies for restorative responses, developing an accessible and easy-to-understand reporting form, triaging concerns, assessing recordkeeping, and developing protocols for reporting on campus culture and climate.

The plan includes considerations for fiscal impact, project leaders, and involved units or individuals. The Implementation Plan acknowledges the need for additional resources across campus departments and proposes a collaborative, system-wide approach to address challenges effectively. The success of the plan relies on coordinated efforts across various university departments, adequate resources and staff, and the commitment to fostering a safe and inclusive campus environment.

INFRASTRUCTURE AND RESOURCES

The Implementation Team aims to strengthen our Title IX/DHR program by strategically addressing key recommendations outlined on pages 38-39 of the CSUSB Cozen O'Conner report. This phased approach centers on budget allocation to sustain current initiatives and bolster ongoing efforts. With a focus on personnel, infrastructure, records management, general oversight of Title IX/DHR activities, and continuous training for campus leadership and Title IX professionals, this plan endeavors to create a robust and comprehensive framework to ensure the well-being of our campus community.

Task 1: Share existing budget line information with the Chancellor's Office, including historical and anticipated annual fees for external investigators, hearing officers, and other Title IX/DHR-related resources, as well as budget line information related to the confidential campus advocates, prevention and education specialists, and respondent resources.

- Project Leader: AVP Human Resources/ED Counseling[1]
- Stakeholder Offices: IEC/Counseling/[2]
- Anticipated Project Completion: Spring, 2025
- Priority Level: High
- Status: For the most recent and accurate budget data, a portion of this project was delayed until the closure of the 2023/2024 fiscal year. The AVP-HR will retrieve prior budget expenses and will work with campus leadership for impacted areas on new and recurring baseline fees. An assessment of prior hearings, outsourced consulting and support, training, and training needs are in progress and are expected to be completed by the end of the Spring 2025 semester. Some fees have already been recorded such as memberships and prior costs of outsourcing.
- Notes/Solutions: Outsourcing investigators and hearing costs can be volatile, but forecasting based on historical trends will be used as a forecast basis. While acquiring budgeting information for HR operations has been challenging, the HR AVP/VP has made progress in acquiring fiscal data for appropriate assessment and resource forecasting.

Task 2: Assess physical infrastructure to see if alternate locations should be considered, to develop a trauma-informed space for the office of IEC. The objective is to remove potential reporting barriers and provide a safe, accessible, confidential, and trauma-informed space.

- Project Leader: AVP Human Resources
- Stakeholder Offices: HR
- Anticipated Project Completion: Fall, 2025
- Priority Level: High
- Status: VP-HR secured satellite space in the student union, which does provide additional visibility in the interim. Starting in the Fall 2024 semester, AVP-HR has collaborated with facilities leadership and campus/auxiliary partners to explore potential trauma-informed spaces for IEC.
  - o Identified space needs for IEC include at a minimum: an office suite with four private offices, one private or semi-private office, space for administrative support and a small waiting lobby (depending on space/location), and a meeting room.

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[1] Associate Vice President of Human Resources (AVP-HR) and Executive Director of Counseling
[2] Student Conduct and Ethical Development (SCED) and Executive Director

o Pending: Formal submission of space requirements to submit to *Campus Facilities Use* (CFU).
● Notes/Solutions: Campus space is limited with high administrative occupancy (barrier). Space considerations: confidentiality, a space that is closer in proximity to collaborators, a space that is welcoming and calming, a confidential space ensuring we are not inadvertently "outing" anyone for visiting Title IX/DHR because of space selection, ensuring the space is not overly student-centered so all campus community members feel welcomed (faculty, staff, students and third parties). Optimally, a space where Title IX/DHR staff are not structurally separated on campus will improve the overall efficacy of IEC operations. Note: the Title IX/DHR office space is a subset of an overall HR Department's need for an adequate and confidential space on campus.

Task 3. Review staffing needs in IEC, Student Conduct and Ethical Development (SCED), Survivor Advocacy Services (Counseling), Employee Labor and Relations (ELR), and Faculty Affairs and Development (FAD) to cover additional core functions, placing special emphasis on prevention, education, and training, etc.

● Project Leader: VP-HR/Counseling/FAD/SCED (Respective areas of oversight)
● Stakeholder Offices: HR/SCED/ELR/IEC/FAD/Counseling
● Anticipated Project Completion: Summer, 2025 (Fiscal 2025-2026)/Partially Completed
● Priority Level: High
● Status: (1) Prevention Outreach and Education Manager hired January 2024 (completed). (2) ELR added an Associate Director and Conflict Resolution Manager - recruitment is underway (partially completed). (3) After SCED's internal assessment, there is the development of a job description for an additional position and the revising of an existing analyst position to assist in the undertaking of addressing OCC responsibilities (in progress). (4) After Counseling's internal assessment, a second position in Survivors Advocacy Services has been added, and an individual has been hired as a Survivor Specialist, an advocate role solely for students.
● Notes/Solutions: The HR VP worked with FAD and Provost to reallocate vacant position funds from FAD to ELR to undertake OCC assessments of faculty reports of OCC. This will provide a more efficient and effective response to OCC and an improved referral and recordkeeping process between IEC/ELR. Additional consideration will be given to staffing needs as the Implementation Plan evolves.

Task 4. Identify additional and ongoing training and professional development needs for Title IX/DHR employees, taking into consideration CO expectations, federal compliance, and stated needs.

● Project Leader: Title IX Coordinator
● Stakeholder Offices: IEC
● Anticipated Project Completion: Spring, 2025 (Partially Completed)
● Priority Level: High
● Status: Assessment of IEC staff training completed. Baseline training and onboarding requirements are established. Identifying training for individual needs and development with corresponding training in progress. Complete assessment by position to be provided to VP-HR with optimal, ideal, and minimum standard options presented for review and approval based on available campus resources.
● Notes/Solutions: Training costs in the Title IX/DHR space are high, including travel. Identification of campus subscriptions provided access to additional training at a discounted cost. Other IEC-paid subscriptions provide additional training at reduced costs (AWI/ATIXA). Consideration of AWI-CH

and ATIXA or other professional certifications as professional development is currently being assessed for budget plausibility. Emphasis on virtual training will be implemented to reduce training costs while ensuring other external training is leveraged to maintain staff competencies and development. IEC has already implemented required staff training with identified available campus subscriptions/resources.

Task 5. Systems Infrastructure: Procure a case management system that will retain and collect consistent case data.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR
- Anticipated Project Completion: Fall, 2024 (Completed)
- Priority Level: High
- Status: Case management system identified (Case Tracker by Grand River Solutions). Procurement achieved and implementation in progress. Technology staff working with vendors.
- Notes/Solutions: New system with learning curve. Ensured support will be available by the vendor. Ongoing system performance will be shared with the Chancellor's Office for consideration of an enterprise-level case management system. Case Tracker assessed for and prospectively operates with significant attributes for operational metrics, KPI, and case management compliance recording.

Task 6. To ensure effective oversight and accountability, establish a supervisory model that includes routine supervisory meetings, detailed guidance on effective oversight and accountability, and appropriate review measures. This model should balance implementers' independence with the need to identify and elevate critical issues and concerns about safety and risk.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Summer, 2024 (Completed)
- Priority Level: High
- Status: Completed. The newly implemented supervisory model includes regular case updates to the VP-HR with all IEC staff members, as well as bi-weekly 1-1 meetings with the Executive Director and IEC staff. Regular interactions occur on case status, questions, and guidance from the Executive Director to IEC staff. Investigation Reports are reviewed for thoroughness, procedural compliance, and equitable reports prior to distribution. The temporary interim Associate Director and Deputy Title IX Coordinator position was made permanent for an additional layer of supervision and to assist the Executive Director. The Associate Director also actively participates in staff meetings, mentoring, and professional development. A specific focus for the Associate Director is to supervise the POEM in all education, prevention, and training compliance efforts. In progress: Documenting processes and protocols, decision-making frameworks, and processes. The IEC Executive Director meets with the Sr. Systemwide Civil Rights Director on a routine cadence and for support as needed. Systemwide Civil Rights has also increased review measures of campus reports and notices.
- Notes/Solutions: IEC is Integrating System-wide guidance as received.

STRENGTHENING INTERNAL PROTOCOLS

The goal of the Implementation Team is to promote accountability and strengthen CSUSB internal protocols within the Title IX/DHR program by focusing on related recommendations in the campus report. The work of the Implementation Team focuses on the life span of a Title IX/DHR report, from intake to resolution, as well as other key recommendations, such as separating advocacy functions from investigations, strengthening campus collaboration through a multidisciplinary team model, and developing tools and written processes for effective case management.

Task 1: Map Title IX/DHR case resolution process from reporting and intake to investigation and resolution.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025 (Partially Completed)
- Priority Level: Moderate/low
- Status: Current Tracks (1-3) are mapped for the overall process. These maps are used during intakes to provide an overview of the formal resolution process(s). Submapping is still pending for internal references and protocol documentation/establishment and partially completed. The timeline projection is correlated to other moderate to high-priority tasks throughout the plan.
- Notes/Solutions: There was an intentional delay to additional mapping pending the revised Nondiscrimination Policy to comply with the 2024 regulations that become effective August 1, 2024, or following the conclusion of a federal injunction on enforcement that includes CSUSB/CSU. It would be beneficial for the CSU System-wide Civil Rights Office to collaborate and share mapping where processes are the same across the system. Administrative mapping is being updated to include processes encompassed in the procured case management system.

Task 2. Develop robust intake, outreach, and case management protocols for supportive measures and resources, including identifying a sustainable model to provide Respondent resources.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025 (Partially Completed)
- Priority Level: Moderate
- Status: IEC implemented the System-wide intake and assessment checklist and guidance issued in October 2023. All reports are acknowledged, and outreach is sent to request an intake meeting. The Survivor Advocate and contact information (including non-CSUSB advocate info) is included in the outreach. Documentation of these protocols is maintained in a log-in and the case file, including the intake assessment checklist (as applicable). Most of the IEC templates have been revised to establish uniformity and clarity. Templates will have an ongoing assessment for necessary revisions. The administration of support roles has been removed from investigators on their cases. Pending: Creation of internal standard operating procedures/checklist documenting current processes for each Title IX/DHR investigation/report review is in progress. Time constraints of the Executive Director delay efficient completion. Case management protocols and process verifications will be integrated into the case management system. Additionally, Respondent support services are being explored through student services, employee services, and the Department of

Faculty Excellence. This is in the beginning stage of exploration. A specific Respondent resource website and brochure are in development.

- Notes/Solutions: Outreach and other supportive protocols are being built into the case management system.

Task 3. Strengthen campus collaboration and information-sharing through a multidisciplinary team (MDT) model.

- Project Leader: AVP-HR
- Stakeholder Offices: IEC/FAD/ SCED/ ELR
- Anticipated Project Completion: Spring 2025, On-going. Teams implemented, efficacy under evaluation
- Priority Level: High
- Status: CSUSB established a Student-Focused Multidisciplinary Team (MDT) and a Staff/Faculty-Focused Multidisciplinary Team (MDT). A charter and charge were established for both MDTs. The MDTs have a regular meeting schedule with standing (that include VP-HR and Dean of Students) and "ad hoc" members/stakeholders for invite where necessary (such as DHRE, OSLE, Athletics, CARE team, SSD, etc.) that started in March 2024. The meetings are organized with an agenda and minutes documented. These meetings help apprise the most appropriate and informed campus response to reports and ensure all available information is presented for an appropriate and prompt response to all allegations/concerns.
- Notes/Solutions: Some triaging is involved before an MDT and referral may occur before an MDT. MDT agendas (limited as appropriate) are sent in advance so members can have adequate time for preparation or to indicate they do not have information to participate or contribute. Resources will be necessary for recommended training (trauma-informed practices, supportive measures, restorative justice, etc.). Existing resources and costs will be assessed for budget consideration.

Task 4. Continue to identify and evaluate barriers to reporting and engagement at the university level, with aggregation of data and advice and guidance by the Chancellor's Office.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: IEC website barriers have been identified and revisions have been ongoing. The IEC Resource page now also includes additional and more accessible resources. A review of highly trafficked university web pages (e.g., Athletics) will be assessed to determine if a reporting link to IEC would be beneficial. Under consideration are survey strategies (continuous) to identify barriers to reporting. This is an evolving science. By Spring 2025, IEC will have identified preliminary potential barriers and will draft a plan to assess and address those barriers by Fall 2025, which will continue forward with further assessment. Other assessments for barriers to reporting are being assessed for identification through surveys, community engagement, and other methodologies,
- Notes/Solutions: The University no longer has an ombuds office, which increased the overflow of OCC to IEC. While this encumbers the IEC administrative report and intake process, Increased resources to address OCC have been provided by the campus President.

Task 5. Ensure the Title IX Coordinator/DHR Administrator remains engaged in any disciplinary processes, including sanctions and appeals, until final.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED/FAD
- Anticipated Project Completion: Spring, 2025 (Partially Completed)
- Priority Level: Moderate
- Status: IEC and ELR share a case management system that will house staff discipline outcomes. IEC will formalize the SCED process of consultation and provision of disciplinary outcomes for the case file, which will also be formalized with the Provost Office. Reasonable timelines will be established between the offices.
- Notes/Solutions: The Associate Provost for Faculty Affairs and Development position was vacant until a new appointment started on July 29, 2024. The disciplinary processes and documentation process will be finalized by spring 2025 (FAD - AP is new to the role and role/process development requires time to establish effective protocol).

Task 6. Develop a process to routinely collect post-resolution feedback from the parties and other impacted individuals.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025
- Priority Level: Moderate
- Status: Considerations established for a post-resolution feedback survey include asking questions such as whether the parties understood the process, were kept adequately informed of the steps in the process, had the timeline explained adequately to them, and received communications about the process as it progressed. The University is considering best practices in seeking post-resolution feedback in a trauma-informed, appropriate manner, and will seek to develop protocols to pilot by the end of the 2024-2025 Academic Year. Considerations for Qualtrics, Smart Sheets, or other software-based post-feedback tools are currently being evaluated. These considerations and selection have been in discourse and are expected to be finalized and implemented for survey distribution by the approaching academic spring, or sooner
- Notes/Solutions: Usually one party is dissatisfied with a resolution outcome, but components of dissatisfaction can be assessed.

COMMUNICATIONS

The goal of the Implementation Team is to support the campus community's immediate and ongoing needs as they relate to Title IX and DHR by implementing marketing and website improvements, as well as initiating short- and long-term strategic communication plans by which to create greater awareness of policies and resources related to these programs. Additionally, this plan sets in place clear mechanisms by which to maintain transparency and accountability with the University's internal and external stakeholders about Title IX and DHR at CSUSB, as well as the progress of the Implementation Team as the University works to meet the recommendations of the Cozen O'Connor report.

Task 1: Ensure the distribution of a clear and consistent communication plan each semester.

- Project Leader: Title IX Coordinator/POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025 (Partially Completed)
- Priority Level: Low
- Status: The University is documenting the process to distribute nondiscrimination notices, policies, and reporting/resources each semester. Currently, these communications are distributed regularly but without a documented process and protocol indicating exactly what will be sent by whom and when. A communications calendar has been developed to ensure that there is not a single point of failure in such communications.
- Notes/Solutions: Campus emails are frequently distributed by campus and community partners, overwhelming email inboxes. Consultation with Strategic Communications will be necessary to establish effective distribution of these communications.

Task 2. Develop an intentional marketing campaign to raise awareness about the role of the Title IX/DHR program, available resources, and resolution options.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Summer, 2025
- Priority Level: High
- Status: POEM has created partnerships with various departments and groups on campus to deliver workshops and presentations related to discrimination, boundaries, bystander intervention, etc. Future programming is scheduled for Fall 2024, related to stalking, interpersonal violence, and other areas of the Nondiscrimination Policy. A planned social media campaign has been established, with a more intentional campaign in each semester for the campus community in progress.
- Notes/Solutions: Campus demand for education and programming is currently exceeding the POEM's capacity and presentation/education requests are being deferred. We are exploring creating video-based programming (for recurring usage) to supplement the demand requirements. Further intentional programming development is pending campus community feedback for programming needs, feedback will be assessed within all modalities to maximize reach, presentation feedback, various community feedback, and campus staff, faculty, and administrator contributions will be applied.

Task 3. Improve the IEC website and other public-facing communications.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025 (Partially Completed)
- Priority Level: Moderate
- Status: Updates to the website that have already been made include an Events page, and a new landing page for Whistleblower complaints, added resources, and content and layout changes. The Resources page is actively being updated, as new resources are discovered and existing resources are vetted. Content revisions will be comprehensive and ongoing. Other planned brochures, posters, and campus communications are being prioritized for campus needs for development and distribution. Categories of needs (Complainant/Respondent resources, staff/faculty/student) and resources are being developed for community resource distribution.
- Notes/Solutions: Information Technology conducts accessibility checks as part of its standard practice on any new materials for the campus website. For timing, the programming and content

development will require committee input and review (see below), pushing the completion date further out until next year.

Task 4. Develop a standing committee of representative student, faculty, and staff ambassadors to support and facilitate institutional efforts to more effectively communicate with campus constituents.

- Project Leader: Chief of Staff
- Stakeholder Offices: IEC
- Anticipated Project Completion: Winter, 2025
- Priority Level: Moderate
- Status: The University is currently identifying individuals to develop a standing committee of representative student, faculty, and staff ambassadors. The committee will review newly developed or revised materials, including website content and communication templates (as appropriate).
- Notes/Solutions: The timing of this committee is correlated to the ongoing newly developed communications and programming set to be distributed to the campus community, modalities under consideration include in-person communications, printed, recorded video/audio (webinar), social media (various platforms), and timing of communications. A supporting charge may be necessary to establish the committee.

Task 5. Develop an expanded annual report with meaningful information/data.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Completed
- Priority Level: Moderate
- Status: Completed as of October 2024 - Initiated phased implementation of CSU Systemwide expanded Annual Report, in conjunction with continued changes, aligning with System-wide guidance on new reporting standards and state reporting compliance.
- Notes/Solutions: System-wide guidance has been received and reporting metrics are currently being collected.

PREVENTION, EDUCATION, PROFESSIONAL DEVELOPMENT, TRAINING, AND AWARENESS

The Implementation Team seeks to establish a comprehensive framework for Title IX/DHR prevention education programming by addressing key recommendations outlined on pages 47-49 of the CSUSB Cozen O'Conner report. Collaborating with students, staff, and faculty, this plan seeks to develop an evidence-based educational programming approach on affirmative consent, bystander intervention, healthy relationships, substance-related education, and the importance of Title IX/DHR proactive supportive measures. The strategy integrates ongoing assessment mechanisms to adapt to evolving campus dynamics and uphold compliance with the Violence Against Women Act (VAWA) provisions of the Clery Act. This plan emphasizes a dedication to sustained prevention and education programming, training, and professional development and seeks to cultivate a campus culture characterized by legal adherence and a culture of respect.

Task 1. Designate one individual with specific oversight of all university prevention and education planning and programming, preferably a full-time role without other job responsibilities

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2024 (Completed)
- Priority Level: High
- Status: Completed - The University has designated one individual with specific oversight of all university prevention and education planning and programming. This is a full-time role and new position: Prevention Outreach & Education Manager (POEM).
- Notes/Solutions: POEM was hired in January 2024.

Task 2. Convene a university-wide Prevention and Education Oversight Committee to coordinate and align programming across the university.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: POEM is currently assessing various constituencies' needs (undergraduate students, graduate students, staff, administrators, and faculty) or the types of programming (compliance, professional development, prevention, education, bystander intervention, etc.) for committee selection. The committee may establish any subcommittees. Committee members will be identified by Winter, 2024. The committee will receive a charge with programming categories (amended as needed) and will coordinate programming and planning.
- Notes/Solutions: Collaborative relationships between POEM and departments have been created, and the POEM has joined existing coalitions related to wellness and safety on campus (Be Well Yotes). The new committee may require a charge from the CSUSB President, which is under consideration. The campus is collaborating with system-level subject matter experts to assist with education, training, materials, and communications related to complex and difficult issues facing all CSU institutions. Resources continue to become available on the Civil Rights Sharepoint. The campus also plans to work in conjunction with the committee, the Chancellor's Office, to develop a strategic plan for university programming.

Task 3. Allot sufficient budget lines to ensure consistent, baseline funding for personnel, legally required programming, and technology/learning management systems.

- Project Leader: AVP-HR
- Stakeholder Offices: IEC/HR
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: The programming and planning stage initially started in July 2023. IEC has secured 2024/2025 annual licensing for mandatory training requirements and procured marketing materials. Budget line projections are being evaluated for sustainable programming and will be provided to reviewing and approving members of the campus cabinet accordingly.
- Notes/Solutions: While budget funds remain a challenge, the campus President and HR-VP have ensured learning management systems remain operational and personnel funding adequate.

RESPONDING TO OTHER CONDUCT OF CONCERN

The plan put forth by the Implementation Team addresses behavior that may not necessarily fall under the protected status of discrimination or harassment but could still disrupt the learning, living, or working environment and violate other University policies as outlined on the CSUSB Cozen O'Connor report pages 49-50. The initial phase entails creating a set of communal agreements that establishes expectations for how members of the CSUSB community should treat one another. Additionally, the plan includes the development of conflict resolution mechanisms, restorative approaches for remedial actions regarding culture and climate, targeted prevention and education programming, and ongoing management of issues of concern.

Task 1: In conjunction with the Chancellor's Office and CSU's Office of General Counsel, develop a statement of conduct that addresses unprofessional conduct, abusive conduct, microaggressions, acts of intolerance, disruptive behavior, free speech and academic freedom, and professionalism.

- Project Leader: VP-HR
- Stakeholder Offices: IEC/ELR/FAD/SCED
- Anticipated Project Completion: Summer, 2025
- Priority Level: Moderate
- Status: CSUSB has reviewed and provided feedback for the system-wide guidance draft language for OCC and the draft "California State University Systemwide Time, Place, and Manner Policy", with a campus addendum near completion. We anticipate these policies to be fully implemented by the end of the Fall 2024 semester, which addresses this task.
- Notes/Solutions: CSUSB will adopt system-wide guidance and policy.

Task 2. Reinforce CSU values and expectations about respect, tolerance, and professionalism through in-person engagement and other programming opportunities.

- Project Leader: POEM
- Stakeholder Offices: SCED/IEC/ELR/FAD
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: Ongoing - Currently in the planning stage to establish a pilot training program with a small group consisting of supervisors, managers, department chairs, and deans to meet the needs of assigned roles. This, as a component of the communications plan already listed and will be integrated accordingly.
- Notes/Solutions: Staff Development (HR) partners may have a qualitative role in completing this task.

Task 3. Strengthen and expand available competencies regarding conflict resolution, navigating interpersonal conflict, restorative justice, and other forms of remedial responses.

- Project Leader: ELR Executive Director/Dean of Students/Associate Provost
- Stakeholder Offices: SCED/IEC/ELR/FAD
- Anticipated Project Completion: Spring, 2025 (Partially completed)
- Priority Level: High

- Status: Partially completed - As listed in "Infrastructure - Task 3", two new positions were added to ELR, which will take lead roles in conflict resolution and training. SCED's evaluation and response is to pursue adding one position and revising the Analyst position to include related case management support in addressing OCC. Further, Counseling has determined they would be adding a hybrid position that will provide additional Survivor Advocate support and additional campus training. This position is currently in recruitment.
- Notes/Solutions: As ground-up programming and new positions will be an experience curve for the campus, some course corrections may be required.

Task 4. Create a centralized reporting mechanism that includes the option for online and anonymous reporting.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED
- Anticipated Project Completion: Fall, 2024 (Completed)
- Priority Level: High
- Status: Completed - The University integrated an online case management system with the IEC online reporting form. The online reporting form will include the option to report anonymously, as well as provide a more intuitive and user-friendly interface. Links to this reporting form can be integrated into SCED, ELR, and FAD website pages or a redirect link to the IEC website.
- Notes/Solutions: Anonymous reporting will be allowed with a note that there may be a limited ability to respond to an anonymous report.

Task 5. Build a triage model/review process to ensure that all reports are assessed by Title IX/DHR and evaluate potential avenues for resolution.

- Fiscal Component: Staff Time
- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED/FAD
- Anticipated Project Completion: Fall, 2024 (Completed)
- Priority Level: Moderate
- Status: Partially complete: The Student and Staff MDTs have been implemented and are a subset of the triage model. The current triage model already incorporates whether there are policy violations or if an investigation is warranted. Referral to the appropriate office and supportive measures are built into the response process. The MDT triage is being assessed for efficacy in this area.
- Notes/Solutions: The triage process will be captured in the case management system.

Task 6. The reporting and resolution processes must ensure a sufficient documentation system to track responsiveness, patterns, and trends.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED/FAD
- Anticipated Project Completion: Fall, 2025
- Priority Level: High
- Status: Partially complete - The University utilizes an intake and assessment checklist for intakes. Also, tracking is now completed from intake to resolution in the case file. The procured case management system will be used to monitor trends and key performance indicators (KPI) for review. While ongoing data is provided to CSUSB Leadership, at least annually, a KPI report will be provided to the campus cabinet or delegate committee to determine if there are any needs for

remedial actions regarding culture and climate, targeted prevention and education programming, and ongoing issues of concern.

● Notes/Solutions: Prior cases may omit the complete documentation cycle.