



IMPLEMENTATION PLAN

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



PREPARED BY

University Implementation Team | 2024 - 2025

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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 with 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 to February 2023. A report identifying core observations and recommendations for improvements at both the system and university levels was shared systemwide on July 17, 2023.

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

IMPLEMENTATION TEAM

To facilitate the implementation of recommendations, Cal Poly formed the below Implementation Team 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 Cal Poly Implementation Team include:

- Title IX Coordinator and DHR Administrator – Kaitlyn Blakey, Director, Civil Rights & Compliance Office ("CRCO")
- Chief of Staff - Kelly Sebastian, Deputy Chief of Staff, Office of the President
- Chair, Women's, Gender and Queer Studies Department and Professor, Interdisciplinary Studies Liberal Arts (ISLA) Department - Elizabeth Adan
- ASI President
- Professor, Philosophy Department - Rachel Fernflores
- Associate Vice President Public Safety - George Hughes
- Associate Vice President Civil Rights and Employee and Labor Compliance – Maren Hufton
- Assistant Vice President for Communications and Media Relations - Matt Lazier

- Assistant Vice President for Student Affairs and Dean of Students - Joy Pedersen

UNIVERSITY DEMOGRAPHICS AND POPULATION

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

CALIFORNIA POLYTECHNIC STATE UNIVERSITY IN SAN LUIS OBISPO		
Location Information		
Location: San Luis Obispo, CA (pop. 48,341) ⁱ	County: San Luis Obispo County (pop. 282,013) ⁱⁱ	Locale Classification: Small Suburb ⁱⁱⁱ
University Information		
President: Jeffrey D. Armstrong Ph.D., (February 2011-present)		
Designations: N/A		
Enrollment		
Total Number of Students ^{iv}	22,051	
Student Ethnicity ^v		
White	51%	
Hispanic / Latino	21%	
Asian	14%	
Two or More Races	8%	
Race and Ethnicity Unknown	3%	
International Student	2%	
Black / African American	1%	
Native Hawaiian / Other Pacific Islander	<1%	
American Indian / Alaska Native	<1%	
Instructional Faculty ^{vi}		
Total Number of Faculty	1,309	
Tenure-Track	54.1%	
Lecturer	45.9%	
Percent Full-Time ^{vii}	68.27%	
Percent Part-Time	31.73%	
Staff ^{viii}		
Total Number of Staff	1,440	
Percent Full-Time	98.4%	
Percent Part-Time	1.6%	

PLAN SUMMARY

The Cozen O'Connor recommendations for Cal Poly 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).

INFRASTRUCTURE AND RESOURCES

The Infrastructure and Resources Subcommittee plan aims to strengthen our Title IX/DHR program by strategically addressing key recommendations outlined on pages 34-35 of the Cal Poly Cozen O'Connor 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. Work with the Chancellor's Office to develop a project plan for addressing gaps and implementing recommendations.

- Project Leader: Implementation Team, Kaitlyn Blakey, Director, CRCO; Chancellor's Office
- Stakeholder Offices: Implementation Team
- Anticipated Project Completion: Ongoing
- Priority Level: The ability to achieve this item depends on external factors, including guidance or action from the CO and changes to law or policy.
- Status: Ongoing
- Notes/Solutions: Cal Poly is committed to working with the Chancellor's Office to develop a plan for addressing gaps through submission of its campus Implementation Plan.

Task 2. Share existing budget line information with the Chancellor's Office, including historic 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 (recognizing that these resources are typically outside of the Title IX/DHR budget).

- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Aug. 1, 2025
- Priority Level: Moderate
- Status: Completed
- Notes/Solutions: Cal Poly is committed to working with the Chancellor's Office to develop a plan for addressing gaps through the submission of its Campus Implementation Plan. Refer to the Fiscal Impact section for additional information.

Task 3. Map functions within the Title IX/DHR program to ensure sufficient personnel to cover all core functions, including: intake and outreach, case management, investigations and hearings, informal resolution, sanctions and remedies, prevention and education, training, data entry and analysis, administrative tasks, and additional resources to support legally-compliant, effective Title IX/DHR programs, as well as the essential care side of campus responses:

3.1. Consider the need for expanding staffing, to include, for example, the Assistant Vice President/Title IX Coordinator/DHR Administrator, an Associate Director/Deputy Coordinator, an Assistant Director/Investigator, two or three Care Managers/Hearing Coordinators, a Training and Education Specialist, one or two or more Investigators, and three Analysts/Administrative Support personnel.

- Fiscal Component: Will require new addition to base budget
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Stakeholder Offices: CRCO
- Anticipated Project Completion: Ongoing – Hired Assistant Director/Investigator in August 2024
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions: The Civil Rights and Compliance Office has been working for the past several months with current available staffing. However, we are looking to add additional positions to support changes in the process. This will be a multi-year effort.

Task 4. Based on benchmarking and recommendations from the Chancellor's Office, identify recurring baseline (or line item) funding (both source and amount) for the Title IX/DHR program.

- Project Leader: Office of the President and Chancellor's Office
- Stakeholder Offices: Civil Rights and Compliance Office, University Personnel, Office of the President
- Anticipated Project Completion: FY 2023-24, FY 2024-25, and FY 2025-26
- Priority Level: The ability to achieve this item depends on external factors, including guidance or action from the CO and changes to law or policy.
- Status: Hold
- Notes/Solutions: The Civil Rights and Compliance Office has been working for the past several months with current available staffing. However, the office is looking to add additional positions to support changes in the process. This will be a multi-year effort.

Task 5. Work with the Chancellor's Office to implement an enterprise-level case management system and develop protocols for consistent collection and retention of data.

- Fiscal Component: Will utilize existing budget for Case IQ as needed
- Project Leader: Chancellor's Office
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: July 2025

- Priority Level: High
- Status: Complete
- Notes/Solutions: Fulfillment of this recommendation requires significant input from the Chancellor's Office. Cal Poly finalized its implementation of Case IQ on campus to efficiently store case data.

Task 6. Ensure an adequate supervisory model that includes a routine cadence of supervisory meetings, guidance about how to ensure effective oversight and accountability measures, an appropriate level of detail for review, development, integration and tracking of decision-making frameworks, and balancing implementers' independence and autonomy with the need to identify and elevate critical issues and concerns about safety/risk.

- Fiscal Component: Will utilize existing budget
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance; Chancellor's Office
- Stakeholder Offices: Civil Rights and Compliance Office; Chancellor's Office
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: The ability to achieve this item depends on external factors, including guidance or action from the CO and changes to law or policy.
- Notes/Solutions: On behalf of the president, the Associate Vice President, Civil Rights and Employee and Labor Compliance, maintains both operational and substantive supervision of matters. The Office of General Counsel and Chancellor's Office provide additional subject matter oversight. Monthly one-on-one meetings at each level of leadership, routine staff meetings, and records maintenance are conducted regularly.

Task 7. Commit to the consistent investment in professional development and continuous learning for Title IX and DHR professionals and senior leaders who oversee the Title IX/DHR program (including Continuing Legal Education, conferences, system training).

- Fiscal Component: Will utilize existing budget, and will require new addition to base budget
- Project Leader: Kaitlyn Blakey, Director, CRCO; Chancellor's Office
- Stakeholder Offices: University Personnel
- Anticipated Project Completion: Ongoing; add for additional staff
- Priority Level: Immediate
- Status: In Progress
- Notes/Solutions: Cal Poly maintains persistent investment in professional development of key leadership.

Task 8. Identify a sustainable model to provide respondent support services.

- Fiscal Component: Will utilize existing budget, and will require new addition to base budget
- Project Leader: Kaitlyn Blakey, Director, CRCO; Chancellor's Office; Christina Tutt, Care Manager
- Stakeholder Offices: CRCO
- Anticipated Project Completion: Ongoing; add for additional student population
- Priority Level: Immediate

- Status: Ongoing
- Notes/Solutions: Since the advent of Title IX hearings, Cal Poly has maintained a Civil Rights and Compliance Office Party Advisor pool of Student Affairs professionals available to either complainants or respondents. Expansion to include capability to act as hearing advisors in non-federal hearings is underway.

Task 9. Directly address the breakdown in partnership and trust gaps that have impacted and eroded effective coordination and disrupted the continuity of care for students.

9.1. Facilitate a communication mediation or a facilitated policy/procedure retreat – by leadership or external subject matter expert – to directly address the concerns of the Civil Rights and Compliance Office and safety concerns and to identify a consistent approach to recurrent process issues.

- Fiscal Component: New base budget required
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: Implementation Team
- Anticipated Project Completion: Ongoing
- Priority Level: Immediate
- Status: In progress
- Notes/Solutions: Civil Rights and Compliance Office to offer "Civil Rights and Compliance Office Institute" workshops to build campus understanding of its policies, procedures, and protocols, and to foster trust and partnership. A communications and branding plan will be developed to build clarity for the campus community regarding roles and responsibilities.

STRENGTHENING INTERNAL PROTOCOLS

The goal of the Strengthening Internal Protocols Subcommittee is to promote accountability and strengthen Cal Poly's internal protocols within the Title IX/DHR program by focusing on related recommendations in the campus report. The work of this subcommittee 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. Coordinate with the Regional Director, Systemwide Title IX/Civil Rights Division, and subject matter experts to:

1.1. Map the case resolution process from reporting and intake through to investigation and resolution process.

1.1.1. Compare the current process against standard practices and identify any concerns related to timeliness, conflicts, gaps in communication, or gaps in consistent process.

1.1.2. Identify, map, and reconcile intersections with faculty/staff grievance and disciplinary processes.

- Fiscal Component: Requires additional base funding
- Project Leader: Kaitlyn Blakey, Director, CRCO; CO
- Stakeholder Offices: CRCO; Project Manager/Business Transformation Specialist
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Mapping of the investigation and resolution process is currently underway. As part of this evaluation, a process map and decision matrix will be created to assess communication gaps or inconsistencies. Support from staff with experience in lean process improvement or Six Sigma (quality improvement methodology) would be an added addition to help with this evaluation.

Task 1.2. Develop robust intake, outreach, and case management protocols for supportive measures and resources.

1.2.1. Develop internal protocols and written tools (e.g., templates and checklists) for intake and outreach, oversight of supportive measures, and decision-making regarding emergency removal or administrative leave.

1.2.2. Seek to hold an intake meeting with all individuals who make a report of conduct that would potentially violate the Nondiscrimination Policy.

1.2.3. Develop protocols for notifying and coordinating with the confidential advocate at the intake meeting, if possible.

1.2.4. Develop or update protocols for information sharing to ensure that the Title IX/DHR Office can fulfill its responsibility of documenting all supportive measures offered, requested, implemented, and if denied, the reasons for the denial.

1.2.5. Create a feedback loop to acknowledge responsible employee reports and confirm receipt of the report and next steps.

1.2.6. Establish standardized protocols for outreach to complainants that involve multiple modalities, systems to document outreach, and a protocol for how and when to make additional outreach in cases with non-responsive complainants, including the potential for outreach through a third-party or a responsible employee.

- Fiscal Component: Will require new addition to base budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Priority Level: High
- Status: Completed
- Notes/Solutions: Protocols existing/complete. Staff to expand to bolster outreach and care support through additional facets.

Task 1.3. Develop integrated, written processes for initial assessment designed to evaluate known facts and circumstances, assess and implement supportive measures, facilitate compliance with Title IX and Clery responsibilities, and identify the appropriate institutional response after triaging the available and relevant information; as part of the initial assessment, the Title IX Coordinator/DHR Administrator should:

1.3.1. Take steps to respond to any immediate health or safety concerns raised by the report.

1.3.2. Assess the nature and circumstances of the report to determine whether the reported conduct raises a potential policy violation and the appropriate manner of resolution under the Nondiscrimination Policy.

1.3.3. Assess the nature and circumstances of the report, including whether it provides the names and/or any other information that identifies the complainant, the respondent, any witness and/or any other individual with knowledge of the reported incident.

1.3.4. Provide the complainant with both oral and written information about on- and off-campus resources (including confidential resources), supportive measures, the right to contact (or decline to contact) law enforcement or seek a civil protection order, the right to seek medical treatment, the importance of preservation of evidence, the right to be accompanied at any meeting by an advisor of choice, and an explanation of the procedural options available.

1.3.5. Refer the report to appropriate campus officials to assess the reported conduct and determine the need for a timely warning or other action under the Clery Act.

1.3.6. Assess the available information for any pattern of conduct by respondent.

1.3.7. Discuss the complainant's expressed preference for manner of resolution and any barriers to proceeding (e.g., confidentiality concerns).

1.3.8. Explain the policy prohibiting retaliation and how to report acts of retaliation.

1.3.9. Determine the age of the complainant, and if the complainant is a minor, make the appropriate report of suspected abuse consistent with state law.

1.3.10. Evaluate other external reporting requirements under federal or state law or memoranda of understanding.

1.3.11. Develop, and follow, a comprehensive written checklist/form to ensure that all required actions are taken under state and federal law.

1.3.12. Develop checklist of factors to consider in determining whether to move forward without a complainant or whether informal resolution is appropriate and ensure sufficient documentation of the determination.

1.3.13. Provide a written statement of concern at the conclusion of the initial assessment to ensure that the complainant (and as appropriate, the respondent) have a clear understanding of the nature of the report and the proposed resolution path.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office; University Police; University Personnel
- Priority Level: High
- Status: Completed
- Notes/Solutions: Existing/complete

Task 1.4. Separate support/advocacy functions from investigation to avoid role confusion and ensure clear demarcation between the individuals who provide supportive measures to a complainant, respondent or other individual in need of assistance, and the investigator.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey
- Stakeholder Offices: Civil Rights and Compliance Office
- Priority Level: High
- Status: Completed
- Notes/Solutions: The care manager handles all supportive measures requests for any Civil Rights and Compliance Office party or matter-affiliate. Investigators conduct intakes and investigations. When possible, the care manager and investigator will both attend intake to reduce repetition. Advocacy functions remain outside of the Civil Rights and Compliance Office.

Task 1.5. Strengthen campus collaboration and information-sharing through a multidisciplinary team (Multi Disciplinary Team) model.

1.5.1. In recognition that the Civil Rights and Compliance Office has a current cross-divisional team that meets every other week to discuss reports and formal complaints, the Title IX coordinator/DHR administrator, in conjunction with the Chancellor's Office, should reexamine the current model and update membership by identifying essential university partners to serve on the Multi Disciplinary Team and set standards for meeting goals and sharing real time information. Multi Disciplinary Team members may include representatives from Student Affairs/Student Conduct, Faculty/Academic Affairs, Human Resources, University Police Department (UPD), Title IX coordinator, DHR administrator, Clergy coordinator, and university counsel.

1.5.2. The Multi Disciplinary Team should meet regularly and, at a minimum, weekly to review all new reports.

1.5.3. The Multi Disciplinary Team should ensure that all known and available information about the parties and the reported incident is shared with Title IX/DHR to inform Title IX/DHR's initial assessment and any steps it determines to take in response (including information maintained outside of Title IX/DHR's recordkeeping systems and information that may only be known to another unit or individual).

1.5.4. The Title IX coordinator/DHR administrator should follow a protocol for securely sharing parties' university ID numbers or names and basic information about the reported incident in advance of Multi Disciplinary Team meetings to enable all participants to query their records systems and bring forward any relevant information.

1.5.5. The Title IX coordinator/DHR administrator should ensure that the Multi Disciplinary Team is trained to treat information confidentially, with sensitivity, and consistent with state and federal privacy laws.

1.5.6. The Multi Disciplinary Team should engage in consultation to inform decisions, including those about emergency removal, administrative leave, the reasonable availability of supportive measures, and questions about the scope of the university's education program or activity.

1.5.7. The Multi Disciplinary Team meetings should serve as natural opportunities for documenting the factors considered in reaching key decisions and documenting what information was known, when it was known, by whom it was known, and what impact it had on the Title IX coordinator/DHR administrator's analysis.

1.5.8. The Multi Disciplinary Team should facilitate the development of shared fluency and knowledge among key university partners related to the legal and regulatory requirements, policy frameworks, and considerations related to care and informed and equitable processes.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey
- Stakeholder Offices: Civil Rights and Compliance Office
- Priority Level: High
- Status: Completed
- Notes/Solutions: The Civil Rights and Compliance Office modified the biweekly meeting to weekly Multi-Disciplinary Team meetings to address new student-related reports. The Multi-Disciplinary Team meets monthly to review all pending items. The charge has been written and repeated to membership. Further implementation is pending Chancellor's Office guidance on Multi-Disciplinary Teams.

Task 1.6. Develop tools for consistent, informed, effective documentation and case management.

1.6.1. For quality control, develop a case opening and closing checklist to ensure that all relevant documents, correspondence, and information are captured and preserved electronically.

1.6.2. To the extent feasible, seek to maintain data in a usable and searchable electronic format for efficient decision making, analysis and review.

1.6.3. Migrate all historical DHR reports and Title IX reports into the enterprise-level case management system, if not already included.

1.6.4. Develop periodic reviews for quality assurance.

- Fiscal Component: Will utilize existing budget for Case IQ
- Project Leader: Chancellor's Office
- Stakeholder Offices: Civil Rights & Compliance Office
- Priority Level: High
- Status: Completed
- Notes/Solutions: Cal Poly has ensured all data is successfully migrated to Case IQ case management system and that every effort will be made to ensure that Case IQ data is maintained in a format that will facilitate any future migration.

Task 1.7. Oversee investigations for quality and consistency of prompt and equitable processes.

1.7.1. Establish a protocol to ensure the timeliness of investigations, with routine quality control mechanisms throughout investigation process.

1.7.2. Develop quality control processes for monitoring active investigations for thoroughness and timeliness and ensure timely communications to parties throughout the investigative process (e.g., calendar internal 30-day, 60-day and 90-day alerts to prompt the investigator or case manager to make outreach to the parties).

1.7.3. Ensure each report has sufficient review by the Title IX coordinator/DHR administrator and university counsel (for legal review of sufficiency and adherence to policy).

- Fiscal Component: Will utilize existing budget and require new addition to base budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Priority Level: High
- Status: Complete
- Notes/Solutions: Existing/complete.

Task 2. Continue to evaluate barriers to reporting and engagement at the University level, with aggregation of data and advice and guidance by the Chancellor's Office.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office

- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Continuing to explore ways to improve timeliness of investigations.

Task 3. Review and revise tone, content, and format of reporting forms and other template communications to soften the legal tone and balance the support arm of the office.

- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: CRCO
- Priority Level: Moderate
- Status: Complete
- Notes/Solutions: The reporting form is from the CSU Nondiscrimination Policy. CRCO solicited feedback from advocates and counselors in Spring 2025 regarding outreach communication and made appropriate edits.

Task 4. Ensure that all communications related to confidentiality and employee duties to report are reviewed for consistency and clarity.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: CRCO
- Anticipated Project Completion: August 1, 2026
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions: Requires campuswide coordination/directive that employee duty to report guidelines and training are within the purview of the Civil Rights and Compliance Office. Managers to ensure compliance with employee duties to report.

Task 5. Review the current post-Title IX/DHR disciplinary processes for faculty and staff to ensure promptness, equity, and informed communication.

5.1. Ensure the Title IX coordinator/DHR administrator remains engaged in any disciplinary processes, including sanctions and appeals, until final.

5.2. Ensure that decisions about negotiated settlements are supported by a careful and coordinated review by all relevant campus and system level administrators.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Priority Level: High
- Status: Completed
- Notes/Solutions: Completed

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

- Fiscal Component: Will utilize existing budget
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Compliance Office
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Fall 2025
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: AVP will send a closing email to parties after a matter is concluded, inviting feedback on their experience with the process. Civil Rights and Compliance Office may develop a post-resolution feedback/comment form for parties.

Task 7. Invest in continued and consistent professional development programming for all Civil Rights and Compliance Office staff in team format to ensure consistent understanding of the concepts and application of the concepts.

- Fiscal Component: Will require an additional base budget
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Stakeholder Offices: CRCO
- Anticipated Project Completion: Fall 2026
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions: Focus on mandated CSU trainings and ongoing workshops.

Task 8. To improve information sharing with supervisors, develop protocols for cases involving employees that address: 1) whether and when an employee respondent's supervisor should be informed of a report of potential prohibited conduct; 2) what information should be shared with the supervisor, including any information that should not be shared; 3) whether and when the supervisor should be consulted or informed about supportive measures and/or administrative leave; 4) what information, if any, should be shared with the supervisor during the investigation, including delays and good cause reasons for delays; and 5) whether and when the supervisor should be informed of the outcome of a matter (written determination or Informal Resolution Agreement).

- Fiscal Component: Will require existing/expanding budget.
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Stakeholder Offices: CRCO
- Anticipated Project Completion: Completed
- Priority Level: High
- Status: Completed
- Notes/Solutions: Continue to ensure coordination with Academic Personnel and Human Resources leadership who can cascade information to managers, in accordance with policy-based safety,

supportive measures, and need-to-know assessments. Case-by-case handling performed by key leaders in University Personnel: chief human resources officer, AVP, Academic Personnel, and Employee and Labor Relations.

Task 9. Establish the expectation that any concerns about policy, process, or practice observed by confidential advocates be addressed directly with responsible administrators and systemwide subject matter experts to facilitate collaborative efforts to improve the overall institutional response.

- Fiscal Component: Will utilize existing budget
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Stakeholder Offices: CRCO
- Anticipated Project Completion: August 1, 2026
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions: Executive administration to coordinate with division and unit leadership to establish expectation.

COMMUNICATIONS

The goal of the Communications Subcommittee is to support the campus community's immediate and ongoing needs as it relates to Title IX, DHR, and Cal Poly's Civil Rights and Compliance Office by implementing marketing and website improvements and 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 Cal Poly, 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 distribution of a clear and consistent communication plan each quarter that includes, at a minimum:

1.1. Dissemination of the Notice of Non-Discrimination.

1.2. Dissemination of the Nondiscrimination Policy.

1.3. Information about reporting and resources.

- Fiscal Component: Will require new base/one time budget increase
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Right and Compliance Office
- Anticipated Project Completion: Fall 2026
- Priority Level: High
- Status: Ongoing

- Notes/Solutions: Existing. The Civil Rights and Compliance Office develops a plan in consultation with University Communication and Marketing. Quarterly emails will be kept on the Civil Rights and Compliance Office website, aligning with the objective to provide an approachable tone. Consider delivering these communications in collaboration with Safer, the Dean of Students, Campus Health and Wellbeing and other campus partners. Additionally, highlight the difference between confidential and non-confidential resources in the communication.

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

2.1. Prioritize the messages of care, supportive measures, and resources.

2.1.1. Share data and information with campus stakeholders about the role and outcomes of the work of its new care manager position.

2.1.2. Identify ways to increase awareness about the care manager's role, including sharing data about the number of individuals served each year, what kinds of supportive measures are most often requested and accessed and the on- and off-campus resources they can provide.

2.2. Differentiate and educate about the difference between confidential resources and reporting options.

2.3. Partner with campus communications professionals to create and promote effective marketing materials, including through the use of professional branding that can be used across platforms (print, web, social media, imprinted on giveaway products).

- Fiscal Component: Will require new one-time budget increase - TBD (requires Request for Proposal, or RFP)
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office, University Personnel, University Communications and Marketing, third-party vendor
- Anticipated Project Completion: Project will be completed in phases with the first phase aiming for completion in Fall 2026.
- Priority Level: High
- Status: In progress
- Notes/Solutions: The Civil Rights and Compliance Office reaches out to third-party marketing vendors, including University Communications and Marketing for expertise and review. We will evaluate root causes of trust gap when rebranding and include stakeholders in giving initial and ongoing input. We will ensure communications are reflective of processes and approach in the Civil Rights and Compliance Office (i.e., processes are caring and supportive).

Task 3. Improve the Title IX/DHR website and other external-facing communications.

3.1. Review and revise web content, across all relevant webpages, for clarity, accuracy, and accessibility.

3.2. Ensure that web content includes photographs and contact information for Title IX/DHR staff, Notice of Non-Discrimination, a link to the Nondiscrimination Policy, an overview of procedural and resolution options (with accessible graphics), how to make a report (to Title IX/DHR or CPPD), on and off-campus confidential resources, the difference between confidentiality and privacy, supportive measures, employee reporting responsibilities, an FAQ, and information on prevention and education programming.

3.3. Update the Notice of Non-Discrimination to include other protected statuses under the Nondiscrimination Policy.

3.4. Gather, evaluate, and update all existing informational materials, web resources, posters/flyers, social media information, and other public-facing communications about the Title IX/DHR program to ensure that those materials:

3.4.1. Reflect the current staffing and structure of the office, the current CSU Nondiscrimination Policy and resolution processes, and current information about on- and off-campus resources including confidential resources.

3.4.2. Ensure content is written in clear language, accessible (from perspectives of both disability and reading comprehension), and consider strategic placement of newly developed print materials in areas frequented by students, staff and faculty.

3.5. Use standardized email addresses and/or materials that are able to be updated quickly (e.g., use of QR codes that point to dynamic webpages that can be updated; using, for example, "TitleIX@[name of university].edu," so that print materials do not become outdated if there is a personnel change, etc.).

- Fiscal Component: Will require new one-time budget increase - TBD
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office, University Personnel, University Communications and Marketing, third-party vendor
- Anticipated Project Completion: Some complete, including the Notice of Nondiscrimination, updated photos, and contact information.
- Priority Level: Intermediate
- Status: In progress
- Notes/Solutions: The Civil Rights and Compliance Office will work with an approved third-party vendor, in consultation with University Communication and Marketing, to complete items not already present. We will seek feedback regarding user experience on the website.

Task 4. Develop an expanded annual report with meaningful information/data.

- Fiscal Component: Will require new one-time budget increase - TBD
- Project Leader: Kaitlyn Blakey
- Stakeholder Offices: University Communications and Marketing, University Personnel, General Counsel

- Anticipated Project Completion: Fall 2026
- Priority Level: Intermediate
- Status: In progress
- Notes/Solutions: Civil Rights and Compliance Office will collaborate with University Communications and Marketing and general counsel to develop an annual report. We will evaluate its accessibility and ensure it is meaningful to the campus; model it after the Annual Security Report (i.e., collaborative process); anticipate forthcoming actions as the outcome of rigorous reporting requirements from SB808. We will work with the Chancellor's Office for additional input.

Task 5. Develop standing committee of representative student, faculty, and staff ambassadors to support and facilitate institutional efforts to more effectively communicate with campus constituents.

- Fiscal Component: Existing budget
- Project Leader: Christina Tutt
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Summer 2026
- Priority Level: Intermediate
- Status: In progress
- Notes/Solutions: Align with recommendation for Prevention and Education Oversight Committee.

Task 6. Leverage community interest on the part of students, faculty, and staff by inviting them to provide input into template communications, annual community messaging and report-outs, responsible employee training content, flyers and posters, and other communications.

- Fiscal Component: Existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office, University Personnel, University Communications and Marketing, third-party vendor
- Anticipated Project Completion: Project will be completed in phases with the first phase aiming for completion in Fall 2026. Website transition will occur in 2026, due to the timing of Cal Poly's enterprise web management system implementation.
- Priority Level: Intermediate
- Status: In progress
- Notes/Solutions: Align with recommendation for Prevention and Education Oversight Committee; conduct surveys and focus groups as needed; seek feedback from both broad community and narrower campus partners with expertise. Align some of this work with the rebranding effort as responsibilities of the third-party vendor.

Task 7. Identify and prioritize opportunities for in-person engagement with Title IX/DHR staff (e.g., pop-up events, tabling at an information fair, open houses in various central locations, routine scheduled short presentations to key audiences, and/or sponsored or co-sponsored events).

- Fiscal Component: Existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO

- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Fall 2026
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Align outreach with Prevention and Education (Task 3).

PREVENTION, EDUCATION, PROFESSIONAL DEVELOPMENT, TRAINING AND AWARENESS

The Prevention and Education Subcommittee's proposed plan seeks to establish a comprehensive framework for Title IX/DHR prevention education programming by addressing key recommendations outlined on pages 41-43 of Cal Poly's Cozen O'Connor report. Collaborating with students, staff, and faculty, this plan seeks to develop an evidence-based educational peer to peer 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. Allot sufficient budget lines to ensure consistent, baseline funding for personnel, legally-required programming and technology/learning management systems.

- Fiscal Component: Will utilize existing budget for current training
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status Ongoing
- Notes/Solutions: The Civil Rights and Compliance Office and Safer will explore additional personnel funding for primary and secondary prevention education, as well as educational efforts geared toward faculty and staff. The Civil Rights and Compliance Office is working on a training program and will integrate increased care coordination into future educational training sessions. An assessment of online training offerings will be conducted to evaluate if current programs are serving our needs, acknowledging different vendors for faculty/staff and students. The Civil Rights and Compliance Office will partner with Student Affairs to develop vendor-owned training for faculty/staff.

Task 2. Proactively coordinate with system-level subject matter experts to assist with education, training, materials and communications related to complex and difficult issues facing all CSU institutions.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Depends upon external factors, including guidance or action from the Chancellor's Office, and changes to laws and policies.
- Priority Level: Intermediate
- Status: Ongoing
- Notes/Solutions: We will work with the Chancellor's Office as they acquire a subject matter expert in primary and secondary prevention and to create synergy with other campuses. We could potentially utilize existing networks between the Chancellor's Office and campuses through CSUAPP, where there is already a prevention group.

Task 3. Designate one individual with specific oversight of all University prevention and education planning and programming, preferably a full-time role without other job responsibilities.

3.1. This coordinator should be tasked with oversight of and responsibility for all legally required programming under Title IX, the Clery Act, and California law.

3.2. The role of the coordinator should be evaluated in the context of Safer's designated Prevention Specialist for gender-based violence initiatives, who oversees sexual violence prevention programming for the campus and manages a team of student staff who serve as peer educators.

- Fiscal Component: Will require new base addition to budget to place in one full-time role
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Safer, Campus Health and Wellbeing, Dean of Students
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status: Ongoing
- Notes/Solutions: Civil Rights and Compliance Office is planning to add care specialists that will support training efforts. Dedicated personnel will be responsible for ensuring compliance with prevention education items, likely in the Civil Rights and Compliance Office with a strong connection to ongoing prevention education efforts from Safer. We will establish clear delineations and expectations between prevention education providers, determine budget item, and create a position description in the context of existing prevention roles on campus. We will collaborate with the leadership of Campus Health and Wellbeing, Safer and Civil Rights and Compliance Office to meet to discuss roles and synergies, identify areas of differentiation. Develop an oversight and approval process for prevention training and materials to be used by Campus Health and Wellbeing, Safer and other appropriate units.

Task 4. Convene a universitywide Prevention and Education Oversight Committee to coordinate and align programming across the university.

4.1. The committee should include all departments who provide training, prevention and education, including, at a minimum, representatives from the Title IX/DHR program, the

confidential advocate, Student Affairs, Student Health, Counseling Services, CPPD, Athletics, Fraternity and Sorority Life, Residential Life, Human Resources and Employee Labor Relations, Academic Affairs, diversity and inclusion (DEI) professionals, identity-based affinity centers, university subject-matter experts, and staff, faculty and student representatives.

4.2. The committee should include subcommittees, as determined by the committee. Committees may focus on the needs of various constituencies (undergraduate students, graduate students, staff, administrators, and faculty) or the types of programming (compliance, professional development, prevention and education, bystander intervention, etc.).

4.3. The committee should be charged with reviewing prevention program content, evaluating proposed programming or speakers, ensuring that prevention-related communications are reaching all constituents, and developing and implementing a mechanism for assessing effectiveness including by monitoring participation levels and measuring learning outcomes.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Student Affairs, Dean of Students, Safer, Campus Health and Wellbeing
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status: Ongoing
- Notes/Solutions: Refer to Department of Justice recommendations for working groups regarding prevention; align prevention and awareness efforts with best practices; share current assessment efforts and identify gaps; create benchmarks specific to our campus; review campus historical initiatives and practices such as the Bias Incident Team, Gender Based Violence Prevention Committee, Critical Care Response Team; identify leader of the group; determine what type of committee this will be (standing, ad hoc, etc.). The assessment of necessary subcommittees and charge will be made once the main committee is formed.

Task 5. With assistance from the Chancellor's Office, develop a strategic plan for University programming that identifies all training requirements under federal and state law and CSU policy, all constituencies, and constituent groups in need of training, and all potential University partners that can collaborate to deliver content.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: University Personnel, Office of the President, various campus constituents (to be determined once plan is more defined/developed)
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status: Ongoing

- Notes/Solutions: Create a prevention education matrix to ensure all topics are being addressed, and high-risk populations are being served. Consider revitalizing the Critical Care Response Team/Gender-Based Violence Prevention Committee.

Task 5.1. Constituent groups subject to required training should include students (undergraduate and graduate); targeted student populations (athletes, Fraternity and Sorority Life, residential students, Residence Life student staff, international students, student leaders); senior leadership; faculty (deans, department chairs, leads, lecturers); staff (managers, supervisors); and campus partners who assist in the implementation of Title IX/DHR.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: University Personnel, Office of the President, various campus constituents (to be determined once plan is more defined/developed)
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status: In progress: Ongoing
- Notes/Solutions: There is an existing matrix and tracking in Civil Rights and Compliance Office. To include coaches, specifically for targeted audiences, and ensure where a special population is identified that their appropriate leadership is also receiving training.

Task 5.2. Identify all university partners who provide programming, including affinity- and identity-based centers and Student Affairs personnel.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: University Personnel, Office of the President, various campus constituents (to be determined once plan is more defined/developed)
- Anticipated Project Completion: Ongoing
- Priority Level: Intermediate
- Status: Ongoing
- Notes/Solutions: Complete a cross-campus programming inventory (possibly with help from a project manager or transformation specialist) to identify key partners - if this is not possible, will consider the use of a simple survey module to gain insights into programming across campus.

Task 5.3. Identify opportunities for virtual and in-person engagement.

- Fiscal Component: Will utilize existing budget
- Project Leader: Civil Rights and Compliance Office; Care Manager Christina Tutt
- Stakeholder Offices: CRCO
- Anticipated Project Completion: Completed
- Priority Level: High
- Status: In progress
- Notes/Solutions:

Care Manager instituted standing meetings with Housing and DOS Care to close the loop on matters classified as OCC. Care Manager also planned and executed a Safer + Title IX summit in Spring 2025.

Task 5.4. Develop core principles and standards for content development.

- Fiscal Component: Will utilize existing budget
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: University Personnel, Office of the President, various campus constituents
- Anticipated Project Completion: Winter 2026
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions: Reviewed standards, created consensus, and confirmed regular intervals to review materials, and refined the role of different entities, and conduct needs assessments of different audiences.

Task 5.5. Build a university calendar that includes online modules, social norm campaigns, orientation for students and employees, recurring opportunities for programming, and awareness events.

- Fiscal Component: Reviewing budget for dedicated prevention and education professional
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: University Personnel, Office of the President, various campus constituents
- Anticipated Project Completion: 2026
- Priority Level: Moderate
- Status: In progress
- Notes/Solutions:

Task 6. Facilitate a consistent communication plan each semester that includes dissemination of the policy, Notice of Nondiscrimination, reporting options and resources.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: The Civil Rights and Compliance Office along with University Personnel currently sends the required Notice of Nondiscrimination at the start of each academic year (fall). We will continue to work with campus partners to communicate the importance of the Civil Rights and Compliance Office related to student and staff support and processes (confidential and non-confidential) available to them.

Task 7. Ensure that programming is coordinated, communicated and tracked.

- Fiscal Component: Will utilize existing budget

- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Emerging in Civil Rights and Compliance Office. Create a centralized repository to share and track programming information and data.

Task 8. Develop a university website dedicated to prevention and campus programming that is kept current, facilitates distribution of prevention and education materials, and incorporates the opportunity for feedback and recommendations.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Civil Rights and Compliance Office reaches out to third-party marketing vendors, including University Communications and Marketing for expertise and review. This work will be included in the rebranding effort.

Task 9. Identify social media platforms and other vehicles for distributing programming information on a regular basis.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Fall 2026
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Will determine the channels that already exist and are utilized and consider the creation of new channels only if existing channels are not suitable.

Task 10. In conjunction with the Chancellor's Office, expand professional development and training for faculty and staff, including senior leadership, deans, department chairs, managers and leads on Title IX and DHR; respectful and inclusive environments; conflict resolution; bystander intervention strategies; effective leadership and supervision; and reporting responsibilities under Title IX, the Clery Act and CANRA.

10.1. Ensure the training includes information about prohibited consensual relationships given the significant overlap of prohibited consensual relationships with Title IX, DHR and other conduct of concern.

- Fiscal Component: Will utilize existing budget

- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: To be determined
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: We will work with the Chancellor's Office to attend offered systemwide training, review existing faculty and staff trainings and opportunities offered to campus from Human Resources, Employee Organizational Development, Safer and Civil Rights and Compliance Office. Create assets and on-demand options to cater to various modes of engagement.

Task 11. Create routine training, education, and professional development opportunities to cultivate competencies in navigating difficult conversations, bridging differences, and modeling respect and civility.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Winter 2026
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: Will determine the audiences for these subjects, develop curriculum appropriate to them, and review existing offerings from local programs and national organizations.

Task 12. Evaluate the potential opportunities for curricular or course-based programming credential-based options.

- Fiscal Component: Will utilize existing budget
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: Provost's Office (deans and department chairs), Office of Diversity and Inclusion, Center for Teaching and Learning
- Anticipated Project Completion: Ongoing
- Priority Level: Low
- Status: Ongoing
- Notes/Solutions: We will review the existing course material from Kinesiology (KINE) 290, last run in 2021, and/or Women's, Gender and Queer Students (WGQS) 301 (Feminisms, Gender and Violence subtitle). Review material existing in Safer Leadership training, identify gaps in existing offers and adapt, and involve Office of Diversity and Inclusion and Center for Teaching and Learning for faculty and staff engagement.

Task 13. Incorporate information about the Nondiscrimination Policy, reporting options and confidential resources in syllabi statements.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Spring 2024

- Priority Level: Moderate
- Status: Completed
- Notes/Solutions: Will review existing syllabi language created by Safer and adapt it to include DHR (already in progress).

Task 14. Commit to providing programming regarding bystander engagement.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Student Affairs, Dean of Students, Safer, Campus Health and Wellbeing
- Anticipated Project Completion: Ongoing
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: As initial steps in the university's commitment to providing programming regarding bystander engagement, will review survey data from climate survey, America College Health Association and With Us to determine existing bystander behaviors. Conduct literature review and consultation with researchers and practitioners on approaches to secondary prevention (bystander education, harm reduction).

Task 15. Participate in national conferences, listservs, networking events and other opportunities to coordinate with other professionals dedicated to prevention.

- Fiscal Component: Will utilize existing budget
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: Student Affairs, Dean of Students, Safer, Campus Health and Wellbeing
- Anticipated Project Completion: Ongoing
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: The Civil Rights and Compliance Office staff already participated in various professional development opportunities including national conferences. In addition, a list of relevant conferences pertaining to the subject matter can be developed. Develop an annual report on professional development opportunities staff have participated in, including data from other prevention specialists across campus for a holistic view.

Task 16. Engage students in the development and delivery of programming through peer educator/peer advocate programs.

- Fiscal Component: Will require a new addition to base budget (e.g., more paid student opportunities)
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office; Safer
- Anticipated Project Completion: Ongoing
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: In coordination with the Civil Rights and Compliance Office, conduct a review of Safer's program and existing offerings, identify additional prospective partners such as Beacon

research, etc. Explore current student research for practitioners and researchers, as well as the opportunity for a certificate program.

Task 17. Identify student leaders who can serve as ambassadors/promoters of this work.

- Fiscal Component: Will utilize existing budget
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Student Affairs, Dean of Students, Safer, Campus Health and Wellbeing
- Anticipated Project Completion: Ongoing
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: In coordination with the Civil Rights and Compliance Office, review of Safer's team as well as identify additional leadership opportunities in other campus offices, such as Associated Students, Inc., and Fraternity and Sorority Life. Review existing campus committees to ensure involvement, including current membership includes Student Health Advisory Committee and Dean of Students Advisory Committee. Ensure participation from college-level Diversity Equity and Inclusion committees.

Task 18. Develop consistent on-campus opportunities to be visible and present in the community.

- Fiscal Component: Will require new one-time addition to budget (e.g., outreach materials)
- Project Leader: Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office, Student Affairs, Dean of Students, Safer, Campus Health and Wellbeing
- Anticipated Project Completion: Ongoing
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: Will review existing partnerships and participation in campus and community events for those that provide education, including the Civil Rights and Compliance Office, Safer, Fraternity and Sorority Life, Housing.

RESPONDING TO OTHER CONDUCT OF CONCERN

The plan put forth by the Other Conduct of Concern Subcommittee addresses behavior that may not necessarily fall under protected status of discrimination or harassment but could still disrupt the learning, living, or working environment and violate other University policies as outlined on Cal Poly's Cozen O'Connor report pages 43-44. The initial phase entails creating a set of communal agreements that establishes expectations for how members of the Cal Poly community should treat one another. Additionally, 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 written policy, document, or statement by senior leadership to establish expectations, guidelines, and/or definitions of conduct.

1.1. The written framework should address unprofessional conduct, abusive conduct, microaggressions, acts of intolerance, and other disruptive behavior in the living, learning, and working environment.

1.2. The written framework must also address intersections with free speech and academic freedom, including the explicit recognition that the CSU cannot discipline for protected speech.

Fiscal Component:

- Project Leader: Chancellor's Office
- Stakeholder Offices: Civil Rights and Compliance Office; University Personnel; Student Conduct
- Anticipated Project Completion: The ability to implement this recommendation depends upon external factors, including guidance or action from the Chancellor's Office, and changes to law and policies.
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Cal Poly developed the Civility Statement, Faculty Code of Ethics, Commitment to Community (AS-695-09) to provide guidelines and communicate expectations for faculty conduct. Senior leadership will continue to work with the Chancellor's Office and CSU Office of General Counsel to refine our policies and write policy on Other Conduct of Concern. We will conduct campus-specific listening and/or information session(s) on revisions and new policies. Leadership will develop campus-specific communications and information session(s) to communicate current and revised policies.

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

- Fiscal Component: Contingent on Budget for Employee and Labor Relations (ER-LR) Manager
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance; Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office
- Anticipated Project Completion: Goal of Winter 2025 but is contingent upon hire of Employee and Labor Relations Manager
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: Colleges and divisional units will schedule discussions with Academic Personnel and Human Resources to discuss Cal Poly's current Civility Statement, Faculty Code of Ethics, Commitment to Community (AS-695-09) and university and expectations about respect, tolerance, and professionalism. Colleges and divisions will be encouraged to articulate common CSU values, incorporate references in their policies, and review in meetings and workshops (including revised and new policies upon approval). To explore the possibility of systemwide listening sessions and

workshops (e.g., via online modality), as well as in-person opportunities and workshops specific to Cal Poly context and values (e.g., aligned with Learn by Doing and The Mustang Way).

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

3.1. Strengthen traditional employee relations functions within human resources to assist in responding to concerns involving faculty and staff.

3.2. Strengthen competencies of managers, supervisors, deans and department chairs by providing expanded training and professional development to meet the needs of assigned roles.

3.3. Consider the need for additional personnel, such as an ombuds or a conflict resolution professional, including those with expertise in restorative justice and mediation.

3.4. Develop communications competencies to embrace the tension of difficult issues including the intersections of speech in the contexts of politically and socially-charged events and issues.

3.5. Communicate the new and available conflict resolution suite of resources through web content, annual training, and awareness campaigns.

3.6. Invest in education and training about conflict resolution.

- Fiscal Component: Contingent on Budget for ER-LR Manager
- Project Leader: Maren Hufton, Civil Rights and Employee and Labor Compliance; Kaitlyn Blakey, Director, CRCO
- Stakeholder Offices: Civil Rights and Compliance Office, President's Office, Chancellor's Office, University Personnel
- Anticipated Project Completion: Project will be completed in phases with the first phase (website reviews) aiming for completion in 2026. Website transition with Other Conduct of Concern in Fall 2025, due to the timing of Cal Poly's enterprise web management system implementation. Additional work will follow.
- Priority Level: High
- Status: Ongoing
- Notes/Solutions: The new Employee Relations-Labor Relations manager will develop a multi-part training system or series of workshops (e.g. modeled on Implicit Bias workshops, UndocuAlly Training Program and/or something similar) on these specific competency areas (interpersonal conflict and conflict resolution; mediation; restorative justice; communication on difficult issues/challenging conversations), possibly with different versions for different campus constituencies (e.g., new students; Week of Welcome leaders; Associated Students, Inc. officers; staff supervisory staff; faculty; department chairs; academic administrators and other Management Personnel Plans, or MPPs). One possible existing example and resource for trainings regarding difficult issues or challenging conversations is the Intergroup Dialogues course (more info: <https://cla.calpoly.edu/student-resources/IGD>). Additionally, hire staff and faculty ombudsperson

with mediation and restorative justice or other relevant and related skills and competencies. Revise websites (AP; HR; Civil Rights and Compliance Office; Office of Diversity and Inclusion others TBD) and communications including announcements in the Cal Poly Report for workshop opportunities, presentations to relevant university committees and units (e.g., Academic Senate; institutional department, heads, and chairs).

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

4.1. Ensure that the landing page for the anonymous reporting option includes appropriate caveats about the university's limited ability to respond to an anonymous report.

- Fiscal Component: existing budget
- Project Leader: Civil Rights and Compliance Office
- Stakeholder Offices: University Personnel, Administration and Finance Webmaster
- Anticipated Project Completion: Project will be completed in phases with the first phase (website reviews) aiming for completion in Fall 2025. Website transition with Other Conduct of Concern in fall 2025, due to the timing of Cal Poly's enterprise web management system implementation. Additional work will follow.
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: Will create a centralized reporting mechanism that includes the option for online and anonymous reporting.

Task 5. Build a triage model/review process to ensure that all reports are assessed by Title IX and DHR professionals (and a subset of the Title IX/DHR MDT) and evaluate potential avenues for resolution that include the following:

5.1. Identify potential policy violation and investigative response, if any.

5.2. Refer to the appropriate administrator/department to coordinate/lead the response.

5.3. Identify reasonably available individual supportive measures, if any.

5.4. Identify appropriate community remedies, if any.

- Fiscal Component: Contingent on Budget for ER-LR Manager
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Anticipated Project Completion: Project will be completed in phases, with the first phase (website reviews) aiming for completion in Fall 2025. Website transition with Other Conduct of Concern in Fall 2025, due to the timing of Cal Poly's enterprise web management system implementation. Additional work will follow.
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: When complaints are within the scope of the Title IX Coordinator or DHR Administrator, will provide the appropriate administrator and ER-LR team with the report of

substantiated violations to consider disciplinary action. Refer conduct of concern outside or Title IX or DHR responsibility to ER-LR Manager to help determine whether further investigation and/or action is necessary. Depending on the outcome, develop appropriate actions (mentoring discussion, memo of counsel, reprimand, or disciplinary action). Engage in mediation and or conflict resolution when appropriate.

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

- Fiscal Component: Budget for Case IQ
- Project Leader: Chancellor's Office
- Stakeholder Offices: Civil Rights & Compliance Office
- Anticipated Project Completion: Summer 2025
- Priority Level: High
- Status: Complete
- Notes/Solutions: All reports of Title IX, DHR, or other conduct of concern issues will be documented in the case management system (Case IQ), including assessment, further investigation or inquiry, findings, and actions taken.

Task 7. This information should be tracked and analyzed on at least an annual basis to inform the need for remedial actions regarding culture and climate, targeted prevention and education programming, and ongoing issues of concern.

- Fiscal Component: Contingent on Budget for ER-LR Manager
- Project Leader: Maren Hufton, Associate Vice President, Civil Rights and Employee and Labor Compliance
- Stakeholder Offices: University Personnel, Civil Rights and Compliance Office
- Anticipated Project Completion: Winter 2026
- Priority Level: Moderate
- Status: Ongoing
- Notes/Solutions: Annually summarize Other Conduct of Concern reports and actions at the aggregate level to identify themes and patterns including categories such as the need to address culture and climate, prevention, and education, and ongoing campus-specific and/or systemwide issues of concern. Determine appropriate metrics and information that can be reported annually like Civil Rights and Compliance Office's annual reporting. The Other Conduct of Concern summary report may be added to an existing annual report or compiled separately in a new annual report dedicated to Other Conduct of Concern.

ⁱ United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/sanluisobispocalifornia/PST045221>, population estimate as of July 1, 2023.

ⁱⁱ 38 United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/sanluisobispocountycalifornia/PST045221>, population estimate as of July 1, 2023.

ⁱⁱⁱ 39 Defined as a territory outside a Principal City and inside an Urbanized Area with population less than 100,000. See National Center for Education Statistics, <https://nces.ed.gov/programs/edge/Geographic/LocaleBoundaries> and <https://nces.ed.gov/surveys/annualreports/topical-studies/locale/definitions>.

^{iv} 40 California State University Enrollment Data, Fall 2022, Cal Poly San Luis Obispo:

https://tableau.calstate.edu/views/SelfEnrollmentDashboard/EnrollmentSummary?iframeSizedToWindow=true&%3Aembed=y&%3AshowAppBanner=false&%3Adisplay_count=no&%3AshowVizHome=no For purposes of this table, “state-supported” refers to students for whom the State of California underwrites some or all of their educational expenses and “self-supported” refers to students whose educational expenses are not underwritten by the state. Across the California State University system, with some exceptions, self-supported degree seeking students are generally those enrolled in programs administered by professional and continuing education programs.

^v 41 Id. This data includes students at the undergraduate, graduate, and post-baccalaureate levels.

^{vi} 52 California State University, CSU Faculty, Fall 2023. See <https://www.calstate.edu/csu-system/faculty-staff/employee-profile/csu-faculty> , except where noted otherwise.

^{viii} 55 California State University, CSU Workforce, Fall 2023. See <https://www.calstate.edu/csu-system/faculty-staff/employee-profile/csu-workforce/Pages/default.aspx>. See “Headcount/FTE by Campus” tab.