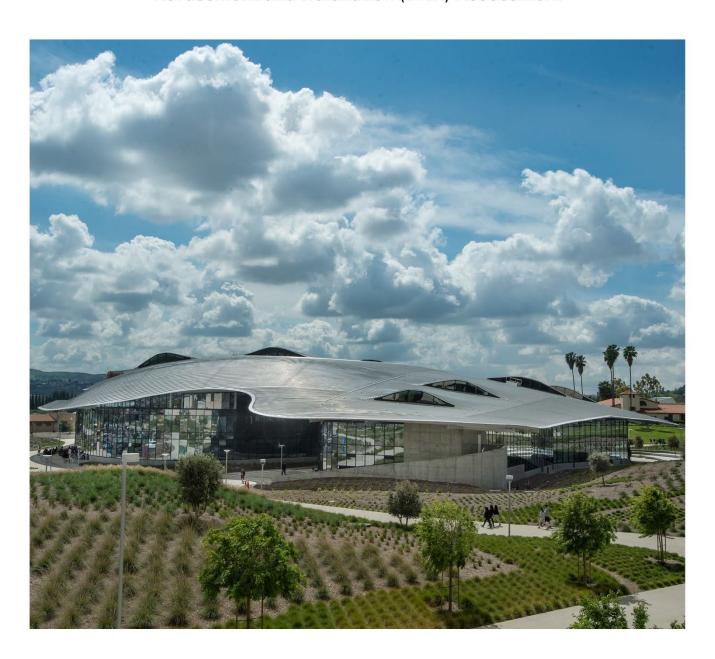


IMPLEMENTATION PLAN

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



PREPARED BY

University Implementation Team | Updated December 2024

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COMMONLY USED ACRONYMS		
CO-Chancellor's Office	OCC-Other Conduct of Concern	
CPP-Cal Poly Pomona	OEC-Office of Equity and Compliance	
DHR-Discrimination, Harassment, Retaliation	PCIA-People, Culture, and Institutional Affairs	
DRC-Disability Resource Center	Res-Life Residential Life	
ELR-Employee Labor Relations	SA-Student Affairs	
EODA-Employee Organizational Development and Advancement	SAS-Survivor Advocacy Services	
FA-Faculty Affairs	SCI-Student Conduct and Integrity	
T-Information Technology	Strat Comm-Strategic Communications	

UPD-University Police Department

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 State University, Cal Poly Pomona received its individualized <u>campus report</u> on July 17, 2023, as well as information from a separate systemwide <u>audit</u> 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, Cal Poly Pomona created an Implementation Team to evaluate, assess, and implement the Cozen O'Connor recommendations at Cal Poly Pomona. The team launched a website dedicated to cataloging the team's plan and progress.

IMPLEMENTATION TEAM

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

Dawnita Franklin, Associate Vice President, Title IX Coordinator/DHR Administrator (Co-Chair)

Nicole Hawkes, Vice President/People Culture and Institutional Affairs and Chief of Staff (Co-Chair)

Kimberly Allain, Senior Associate Vice President, Employee & Organizational Development and Advancement

Robert Almand, Director of Executive Communications

Andrea Cunanan, Student (third year), Psychology and History

Rhonda Dixon, Senior Coordinator and Advocate, Survivor Advocacy Services

Chelsea Epps, CPP Campus Counsel

Dr. Cheryl Koos, Associate Vice President for Faculty Affairs

Yasmin Iltchi, Director, Employee/Labor Relations & Compliance
Hallie Lewis, Associate Vice President for Student Health and Wellbeing
John McGuthry, Vice President & Chief Information Officer, Division of Information
Technology & Institutional Planning
Emily Nunez, Student (third year), Sociology
Weston Prisbrey, Interim Assistant Dean for Student Health & Wellbeing
Dr. Bharti Sharma, Associate Professor, Biological Science, College of Science
George Tejadilla, Executive Director of Academic Personnel

UNIVERSITY DEMOGRAPHICS AND POPULATION

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

CALIFORNIA STATE UNIVERSITY, Cal Poly Pomona							
Location Information							
Location:	County:			Loca	ile Cla	ssificat	ion:
Pomona	Los Angeles						
University Information							
President:							
Dr. Soraya Coley							
Designations:	Designations:						
<u>Enrollment</u>							
Total Number of Students: 26,415	1						
Student Ethnicity							
	White	3,557					
His	spanic/Latino	14,085					
	Asian	5,732					
Two o	r More Races	985					
Race and Ethnic	city Unknown	821					
Black/Afric	an American	669					
Internat	ional Student	494					
Native Hawaiian/Other Pa	cific Islander	429					
American Indian/A	Alaska Native						
Instructional Faculty							
Total Numb	er of Faculty	1497					
	Tenure-Track	558 (include	s tenu	red)	+ 25	FERP	(retired
		working PT)		,			`
	Lecturer	916 (914 Pt +	2 FT)				

CALIFORNIA STATE UNIVERSITY, Pomona Implementation Plan | Updated December 2024

Percent Full-Time	37%			
Percent Part-Time	63%			
Staff				
Total Number of Staff	1,287			
Percent Full-Time	94.25%C			
Percent Part-Time	5.75%			

PROGRESS TO DATE

The Cal Poly Pomona Implentation Team is committed to successfully implementing the recommendations noted in the campus report. As of December 2024, 108 of the 122 recommendations have been completed.

PLAN SUMMARY

The Cozen O'Connor recommendations for Cal Poly Pomona 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 Implementation Team aims to strengthen our Title IX/DHR program by strategically addressing key recommendations outlined on pages 36-40 of the Cal Poly Pomona 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 oversite 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: Dawnita Franklin/Nicole Hawkes

• Stakeholder Offices: Equity and Compliance/Chancellor's Office

• Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

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: Dawnita Franklin

• Stakeholder Offices: Equity and Compliance/President's Office/Chancellor's Office

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/President's Office
 Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

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: Dawnita Franklin

Stakeholder Offices: OEC/President's Office/CO
 Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

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.

Project Leader: John McGuthryStakeholder Offices: OEC/IT/CO

Anticipated Project Completion: Fall 2025

Priority Level: MediumStatus: In Progress

Task 5.1: Upgrade records management systems for faculty records

Project Leader: John McGuthry/ Cheryl Koos

Stakeholder Offices: FA/IT

• Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/President's Office
Anticipated Project Completion: Fall 2023

Priority Level: MediumStatus: Completed

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 (CLEs, conferences, system training, etc.).

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/President's Office
 Anticipated Project Completion: Ongoing

Priority Level: MediumStatus: Completed

STRENGTHENING INTERNAL PROTOCOLS

The goal of the Implementation Team is to promote accountability and strengthen Cal Poly Pomona 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.

PLAN SUMMARY - STRENGTHENING INTERNAL PROTOCOLS

Task 1: Coordinate with the Regional Director, Systemwide Title IX/Civil Rights Division, and subject matter experts to: Map the case resolution process from reporting and intake through to investigation and resolution process.

Project Leader: Dawnita FranklinStakeholder Offices: OEC/CO

Anticipated Project Completion: Jan-24

Priority Level: High

· Status: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

• Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 1.2: Streamline the process from intake to Notice of Investigation to ensure timely notice to respondents, initiation of investigations, and lessened burdens on complainants

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 1.3: Identify, map, and reconcile intersections with faculty/staff grievance and disciplinary processes.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Faculty Affairs/ELR
 Artisin and Project Occupations Fall 2004

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

Task 2: Develop robust intake, outreach, and case management protocols for supportive measures and resources.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 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

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 2.2: Discontinue the practice of redirecting a complainant to the online complaint form.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 2.3: Seek to hold an intake meeting with all individuals who make a report of conduct that would potentially violate the Nondiscrimination Policy.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 2.4: Developed protocols for notifying and coordinating with the confidential advocate at the intake meeting, if possible.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/ Survivor Advocate Services

Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

Task 2.5: 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 2.6: Create a feedback loop to acknowledge responsible employee reports and confirm receipt of the report and next steps.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 2.7: Established 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.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 3: Developed 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:

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 3.1: Take steps to respond to any immediate health or safety concerns raised by the report.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 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.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 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.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita FranklinStakeholder Offices: OEC/Clery

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 3.6: Assess the available information for any pattern of conduct by respondent.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: Low

· Status: Completed

Task 3.7: Discuss the complainant's expressed preference for manner of resolution and any barriers to proceeding (e.g., confidentiality concerns).

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 3.8: Explain the policy prohibiting retaliation and how to report acts of retaliation.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 3.10: Evaluate other external reporting requirements under federal or state law or memoranda of understanding.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 3.11: Develop, and follow, a comprehensive written checklist/form to ensure that all required actions are taken under state and federal law.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Faculty Affairs/ELR/Student Affairs

Anticipated Project Completion: Fall 2024

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: N/A

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 5: Strengthen campus collaboration and information-sharing through a multidisciplinary team (MDT) model.

Project Leader: Dawnita Franklin/Weston Prisbrey

• Stakeholder Offices: OEC/Faculty Affairs/ELR/UPD/SAS/Res Life/SCI

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.1: The Title IX Coordinator/DHR Administrator, in conjunction with the Chancellor's Office, should identify essential university partners to serve on the MDT and set standards for meeting goals and sharing real time information. MDT members may include representatives from Student Affairs/Student Conduct, Faculty/Academic Affairs, Human Resources, UPD, Title IX.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/CO/Faculty Affairs/ELR/UPD/SAS/Res Life/SCI

• Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.2: The MDT should meet regularly and at a minimum, weekly, to review all new reports.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/CO/Faculty Affairs/ELR/UPD/SAS/Res Life/SCI

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.3: The MDT should ensure that all known and available information about the parties and the reported incident is shared with TIX/DHR to inform TIX/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).

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

Task 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 MDT meetings to enable all participants to query their records systems and bring forward any relevant information.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.5: The Title IX Coordinator/DHR Administrator should ensure that the multidisciplinary team is trained to treat information confidentially, with sensitivity, and consistent with state and

federal privacy laws.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/Faculty Affairs/ELR/Res Life/UPD/SAS/SCI

Anticipated Project Completion all 2024

Priority Level: HighStatus: Completed

Task 5.6: The MDT 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.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/Faculty Affairs/ELR/Res Life/UPD/SAS

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.7: The MDT 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.

• Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/Faculty Affairs/ELR/Res Life/UPD/SAS

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.8: The MDT 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.

Project Leader: Dawnita Franklin/Weston Prisbrey

Stakeholder Offices: OEC/Faculty Affairs/ELR/Res Life/UPD/SAS/SCI

• Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 6: Develop tools for consistent, informed, effective documentation and case management.

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2024

Priority Level: LowStatus: Completed

Task 6.2: To the extent feasible, seek to maintain data in a usable and searchable electronic format for efficient decision making, analysis and review.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 6.3: Migrate all historical DHR reports and Title IX reports into the enterprise-level case management system, if not already included.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 6.4: Develop periodic reviews for quality assurance.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 7: Oversee investigations for quality and consistency of prompt and equitable processes.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 7.1: Establish a protocol to ensure the timeliness of investigations, with routine quality control mechanisms throughout investigation process.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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).

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 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).

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/CO

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 8: 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.

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC/CO

Anticipated Project Completion: Spring 2025

Priority Level: Low

Status: Completed

Task 9: Review and revise tone, content, and format of reporting forms and other template communications.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 10: Review the current post-Title IX/DHR disciplinary processes for faculty and staff to ensure promptness, equity, and informed communication.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

Task 10.1: Ensure the Title IX Coordinator/DHR Administrator remains engaged in any disciplinary processes, including sanctions and appeals, until final.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

• Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

Task 10.2: Ensure that decisions about negotiated settlements are supported by a careful and coordinated review by all relevant campus and system level administrators.

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC/Campus Counsel/Faculty Affairs/ELR

Anticipated Project Completion: Fall2024

Priority Level: MediumStatus: Completed

Task 11: Develop and implement a process to routinely collect post-resolution feedback from the parties and all impacted individuals.

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2025

Priority Level: LowStatus: Completed

COMMUNICATIONS

The goal of the Implementation Team is to support the campus community's immediate and ongoing needs as it relates 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 Cal Poly Pomona as well as the progress of the Implementation Team as the University works to meet the recommendations of the Cozen O'Conner report.

Task 1: Ensure distribution of a clear and consistent communication plan each semester that includes, at a minimum: **1.1:** Dissemination of the Notice of Non-Discrimination. **1.2** Dissemination of the Non-Discrimination Policy. **1.3:** Information about reporting and resources.

Project Leader: Dawnita Franklin/Robert Almand

Stakeholder Offices: OEC/Strat CommAnticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

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: Candy Alvarado/Robert Almand

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

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

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC/Strat Comm

• Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

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

Project Leader: Dawnita Franklin/Robert Almand
 Stakeholder Offices: OEC/Strat Communications

• Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

Task 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: (see above)

Project Leader: Dawnita Franklin/Robert Almand

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

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

• Project Leader: Robert Almand

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

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

Project Leader: Robert Almand

Stakeholder Offices: OEC/Strat CommAnticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 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 UPD), on and off campus confidential resources, the difference between confidentiality and privacy, supportive measures, employee reporting responsibilities, an FAQ, prevention and education programming.

Project Leader: Candy Alvarado/Robert Almand

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

Task 3.3: 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:

Project Leader: Candy Alvarado/Robert Almand

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

Task 3.4: 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.

Project Leader: Dawnita Frankin/Robert Almand

Stakeholder Offices: OEC/Strat Comm
 Artisinated Project Completion: Fall 20

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 3.5: Are written in clear language, accessible (from both a disability perspective and a reading comprehension perspective), and consider strategic placement of newly developed print materials in areas frequented by students, staff, and faculty.

Project Leader: Dawnita Frankin/Robert Almand

Stakeholder Offices: OEC/Strat Comm
 Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 3.6: A 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.).

Project Leader: Robert Almand

Stakeholder Offices: OEC/Strat Comm
 Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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

• Fiscal Component: None

Project Leader: Dawnita Franklin/Robert Almand

Stakeholder Offices: OEC/Strat CommAnticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Strat Comm
Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 6: 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).

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2024

Priority Level: MediumStatus: Completed

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 30-33 of the Cal Poly Pomona Cozen O'Conner 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.

• Project Leader: Dawnita Franklin

• Stakeholder Offices: OEC/IT/President's Office

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/President's Office
 Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: Completed

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.

Project Leader: Dawnita FranklinStakeholder Offices: OEC/CO

Anticipated Project Completion: Fall 2023

Priority Level: HighStatus: Completed

Task 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.

• Project Leader: Dawnita Franklin/Candy Alvarado

• Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2024

Priority Level: MediumStatus: Completed

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

Project Leader: Dawnita Franklin/Candy Alvarado

Stakeholder Offices: OEC/SAS/Clery

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 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, UPD, athletics, fraternity and sorority life, residential life, human resources and employee labor relations, academic/faculty affairs, DEI professionals, identity-based affinity centers, university subject-matter experts, and staff, faculty, and student representatives.

Project Leader: Dawnita Franklin/Candy Alvarado

Stakeholder Offices: OEC/Student Affairs/Faculty Affairs/EODA

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

Task 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.).

Project Leader: Dawnita Franklin/Candy Alvarado

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

Task 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.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2025

• Priority Level: Medium

· Status: Completed

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.

Project Leader: Dawnita FranklinStakeholder Offices: CO/OEC

Anticipated Project Completion: Spring 2024

Priority Level: HighStatus: In Progress

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.

Project Leader: Dawnita Franklin/Candy Alvarado

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.2: Identify all university partners who provide programming, including affinity and identity-based centers and student affairs personnel.

Project Leader: Candy Alvarado/Rhonda Dixon

Stakeholder Offices: OEC/SAS

Anticipated Project Completion: Spring 2024

Priority Level: MediumStatus: Completed

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

Project Leader: Candy Alvarado

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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

Project Leader: Dawnita Franklin / Candy Alvardo

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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.

Project Leader: Candy Alvarado/Rhonda Dixon

Stakeholder Offices: OEC/SAS

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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

• Project Leader: Candy Alvarado/Dawnita Franklin

Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: In Progress

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

Project Leader: Candy Alvarado/Dawnita Franklin

Stakeholder Offices: OEC

• Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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.

Project Leader: Candy Alvarado

Stakeholder Offices: OEC/Strat Comm/SASAnticipated Project Completion: Spring 2025

Priority Level: MediumStatus: In Progress

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

Project Leader: Candy Alvarado

Stakeholder Offices: OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

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.

• Project Leader: Dawnita Franklin/Candy Alvarado

• Stakeholder Offices: OEC/CO

Anticipated Project Completion: Spring 2025

Priority Level: HighStatus: Completed

Task 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.

Project Leader: Candy Alvarado

Stakeholder Offices: CO/OEC

Anticipated Project Completion: Fall 2023

Priority Level: LowStatus: Completed

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

Project Leader: Candy Alvarado/EODA

Stakeholder Offices: OEC/EODA/

Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

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

Project Leader: Candy Alvarado

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2025

Priority Level: LowStatus: In Progress

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

Project Leader: Candy Alvarado

Stakeholder Offices: OEC/Academic Affairs
 Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

Task 14: Commit to providing programming regarding bystander engagement.

Project Leader: Candy Alvarado

Stakeholder Offices: OEC/Survivor Advocate Services

• Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed

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

• Project Leader: Candy Alvarado

Stakeholder Offices: OEC/Survivor Advocate Services

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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

Project Leader: Candy Alvarado/Rhonda Dixon

Stakeholder Offices: OEC

Anticipated Project Completion: Spring 2025

• Priority Level: Medium

· Status: Completed

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

Project Leader: Candy Alvarado/Rhonda Dixon/Dawnita Franklin

• Stakeholder Offices: OEC/Survivor Advocate Services/ASI/Student Affairs

Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

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

Project Leader: Candy Alvarado

Stakeholder Offices: OEC/Student Affairs/Faculty Affairs

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

RESPONDING TO OTHER CONDUCT OF CONCERN

The plan put forth by the Implementation Team 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 the Cal Poly Pomona Cozen O'Connor report pages 33-35. The initial phase entails creating a set of communal agreements that establishes expectations for how members of the Cal Poly Pomona 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.

PLAN SUMMARY - OTHER CONDUCT 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.

Project Leader: Dawnita Franklin/Yasmin Iltchi

Stakeholder Offices: OEC/COAnticipated Project Completion:

Priority Level: HighStatus: In Progress

Task 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.

Project Leader: Yasmin Iltchi

Stakeholder Offices: OEC/Inclusive Excellence/ELR/FA

Anticipated Project Completion: Spring 2025

Priority Level: HighStatus: In Progress

Task 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.

• Project Leader: Yasmin Iltchi

Stakeholder Offices: OEC/Inclusive Excellence/ELR/FA

Anticipated Project Completion: Spring 2025

Priority Level: HighStatus: In Progress

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

Project Leader: Kim Allain/Nicole Hawkes

Stakeholder Offices: OEC/Inclusive Excellence/ELR/FA

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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

Project Leader: Dawnita Franklin/Nicole Hawkes

Stakeholder Offices: OEC /EODA

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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

Project Leader: Dawnita Franklin/Yasmin Iltchi/Cheryl Koos

Stakeholder Offices: OEC/ELR/FA

Anticipated Project Completion: Fall 2024

• Priority Level: Medium

· Status: Completed

Task 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.

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/ELR/EODA

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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

Project Leader: Nicole Hawkes

Stakeholder Offices: OEC/ ELR/FA Student Affairs

Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

Task 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.

Project Leader: Dawnita FranklinStakeholder Offices: OEC /ELR/FA

Anticipated Project Completion: Spring 2025

Priority Level: HighStatus: Completed

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

• Project Leader: Dawnita Franklin/Nicole Hawkes

• Stakeholder Offices: OEC/Strat Comm

Anticipated Project Completion: Spring 2025

Priority Level: HighStatus: In Progress

Task 3.6: Invest in education and training about conflict resolution.

Project Leader: Dawnita Franklin/Nicole Hawkes

Stakeholder Offices: PCIA/President's Office/EODA

Anticipated Project Completion: Summer 2024

Priority Level: HighStatus: Completed

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

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Student AffairsAnticipated Project Completion: Spring 2025

Priority Level: HighStatus: Completed

Task 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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Student AffairsAnticipated Project Completion: Spring 2025

Priority Level: HighStatus: Completed

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:

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/ Student Affairs

Anticipated Project: Spring 2025

Priority Level: HighStatus: Completed

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

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC/Student Affairs
 Anticipated Project Completion: Fall 2024

Priority Level: HighStatus: Completed

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

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC /Student Affairs

Anticipated Project Completion: Spring 2024

Priority Level: MediumStatus: Completed

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

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC /Student Affairs
 Anticipated Project Completion: Fall 2024

Priority Level: MediumStatus: Completed

Task 5.4: Identify appropriate community remedies, if any.

Project Leader: Dawnita Franklin/Yasmin Iltchi

• Stakeholder Offices: OEC /Student Affairs

Anticipated Project Completion: Spring 2025

Priority Level: Medium
 Status: Completed

Status: Completed

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

• Project Leader: Dawnita Franklin

Stakeholder Offices: OEC /Student Affairs

Anticipated Project Spring 2025

Priority Level: HighStatus: Completed

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.

Project Leader: Dawnita Franklin

Stakeholder Offices: OEC /Student Affairs
 Anticipated Project Completion: Spring 2025

Priority Level: MediumStatus: Completed