

Cozen Implementation

Areas of Discussion

- Summary of Cozen Assessment Findings (Systemwide)
- Summary of State Audit Findings (Systemwide)
- Summary of Cal Poly Humboldt Cozen Report Findings
- Systemwide Guidance on Implementation Team Responsibilities
- Systemwide Guidance to Implementation Team
 - The Charge
 - Core Values
 - Next Steps
- Q&A

Summary of Cozen Assessment Findings (Systemwide)

- (1) Need for greater coordination, oversight, accountability measures, and support to campus TIX/DHR programs
Recommendation: CO shift model from advisory to deliberate oversight role
- (2) Infrastructure for effective TIX/DHR implementation is insufficient *as designed* to carry out care and compliance responsibilities
Recommendation: Campuses assess and allocate sufficient resources; CO increase staffing
- (3) Need for improved prevention education, professional development, training, and awareness initiatives
Recommendation: CO & campuses create / designate position(s) dedicated to oversight
- (4) Need for improved response to conduct that falls outside the scope of Nondiscrimination Policy
Recommendation: CO develop written policy to address this area; use common CMS

Summary of State Audit Findings (Systemwide)

- (1) CO has not ensured that campuses adequately and consistently investigate allegations of Sexual Harassment
- (2) CO has not ensured that campuses address Sexual Harassment through discipline and corrective actions
- (3) CO must take a more active approach to preventing and addressing Sexual Harassment

The Audit recommended specific actions be taken by the CO and campuses to improve investigation tradecraft in the following areas specific to Sexual Harassment cases:

- Initial assessment of allegations
- Investigation procedures
- Timeliness of response
- Case file documentation
- Systemwide data oversight

Summary of Cal Poly Humboldt Cozen Report Findings

- (1) Campus partners and constituents expressed concern about insufficient infrastructure, communications challenges, and a trust gap with key stakeholders
Recommendation: Increase staffing; review and update template communications; ongoing professional development; multi-disciplinary team to strengthen collaboration
- (2) Prevention and education initiatives are robust but lack coordinated, strategic approach
Recommendation: Build formal Prevention & Education program with designated Coordinator and/or Committee
- (3) Campus struggles to consistently respond to conduct that may not fall under the Nondiscrimination Policy (“Other Conduct of Concern”)
Recommendation: Work with CO to develop formal process to address reports of Other Conduct of Concern; document all reports in CMS (Maxient)

Systemwide Guidance on Implementation Team Responsibilities

What are the roles of the Title IX Office and the Implementation Team?

The **Title IX Coordinator** (TIX-C) is responsible for designing and planning steps necessary to implement Cozen's recommendations.

The role of the **Cozen Implementation Team** is to:

- Represent the perspective of campus stakeholders regarding implementation of recommendations
- Facilitate and support the campus' implementation plan, consistent with timelines and assessment goals
- Drive informed and collaborative communications to all university stakeholders on implementation efforts

Systemwide Guidance to Implementation Team - The Charge

The Implementation Teams will give input and feedback to the Title IX Coordinator and DHR Administrator as they design and plan steps to implement Cozen O'Connor's recommendations to ensure that the recommended action steps are appropriately informed by the perspectives of campus community stakeholders.

After the president approves the action steps, the Implementation Team will work to ensure that implementation is consistent with agreed-upon timelines, the goals of the assessment and campus culture.

The Implementation Teams will also help develop a formal communications plan designed to keep each university community apprised of the implementation process and status.

The frequency and methods of communications to the university community should be thoughtfully planned, and the substance of the communications themselves should be accessible and easily comprehensible by a wide audience.

Systemwide Guidance to Implementation Team - Core Values

Support and elevate the work and authority of campus Title IX and DHR programs. This includes a recognition and acceptance:

- that there are some aspects of Title IX and DHR work established by law and regulatory agencies that this team (and the CSU at large) must honor.
- of each member's subject matter expertise or experience, and how that strength can serve the team.
- that the team will not interfere with the responsibilities and duties of the Title IX coordinator and DHR administrator.

Prioritize accessibility and inclusion, to allow for a diversity of opinion to be heard and considered, in order to:

- ensure inclusion of historically marginalized voices, commit to ensuring the elevation of all voices within the Implementation Team.
- recognize the diverse needs and perspectives of different campus constituents.

(This is a partial list of the Core Values listed in the Charge to University Implementation Teams provided by the CO.)

Systemwide Guidance to Implementation Team - Next Steps

Develop a communications plan to keep campus community apprised of implementation progress and status

Develop and maintain an Implementation Team website (<https://titleix.humboldt.edu/cozen>)

Advise TIX-C in developing proposed implementation plan for President's approval.

This will be a deliberate process -

“The [State audit and Cozen assessment] reports – and associated recommendations – are thorough and detailed, and it will likely take two to three years, and perhaps longer, to fully implement the recommendations.”

- Interim Chancellor Jolene Koester, 28 July 2023

Title IX & Discrimination, Harassment, & Retaliation Prevention



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Cozen O'Connor

Cozen O'Connor Assessments

What's Covered on this Page:

[Cozen O'Connor Assessments](#) | [Implementation Team Communications & Updates](#) | [Resources and Links](#)

As part of a California State University effort to improve Title IX processes, the Cozen O'Connor Institutional Response Group assessed how the CSU and its 23 campuses respond to reports and incidents of discrimination and harassment—which includes all conduct that falls under Title IX.

Quick Links

- [Confidential Support](#)
- [CSU System Cases](#)
- [O'Connor](#)
- [File a Title IX/DMR report](#)
- [File other reports with](#)

Quick Escape

(Cal Poly Humboldt Cozen Assessment Team website)