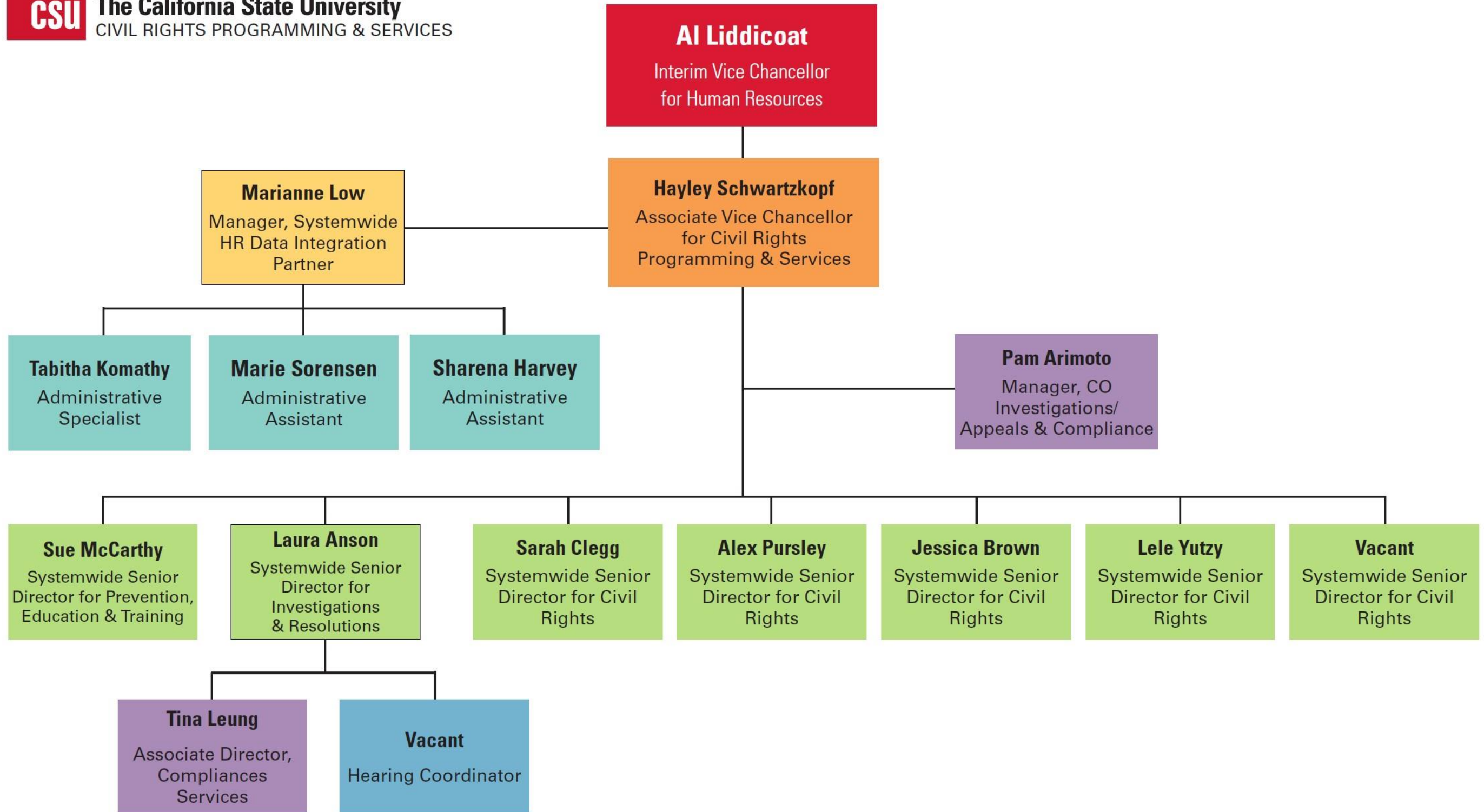


# CSU Civil Rights Update for Legislative Staff

August 9, 2024





# CSU REGIONAL MODEL



# State Auditor's Recommendations

<p><b><u>Recommendation #1:</u></b> Issue specific guidance and resources on case intake and initial assessment to ensure that campuses consistently and appropriately justify and document their decisions about whether to conduct formal investigations.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #2:</u></b> Issue guidance regarding the structure of analyses of evidence, including conducting a credibility analysis, assessing evidence against allegations and likelihood of occurrence, cumulative effect of conduct, and analysis of conduct meeting the definition of sexual harassment.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #3:</u></b> Issue guidance regarding the sexual harassment definition, including specific examples, to provide a framework for how investigators should interpret each component of the CSU's definition of sexual harassment.</p>	<p><b>Fully Implemented</b></p>

# State Auditor's Recommendations

<p><b><u>Recommendation #4:</u></b> Issue guidance regarding documented review and approval of analyses or outcomes of sexual harassment reports in order to mitigate the risk of inappropriate interference.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #6:</u></b> Issue guidance regarding the informal resolution process, including template agreement and possible resolutions, to clarify this process for universities.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #7:</u></b> Require all universities to track key dates and timeline extensions in a consistent manner, including developing a system for reminders and follow-up to improve timeliness of investigations.</p>	<p><b>Fully Implemented</b></p>

# State Auditor's Recommendations

<p><b><u>Recommendation #8:</u></b> Identify a solution for assessing that universities have adequate resources for conducting formal investigations, including consideration of employing a pool of dedicated systemwide investigators external to the universities.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #10:</u></b> Issue guidance about best practices for initiating, carrying out, and documenting disciplinary or corrective action after a finding of sexual harassment in order to ensure that universities are providing prompt discipline.</p>	<p><b>Fully Implemented</b></p>
<p><b><u>Recommendation #11:</u></b> Issue guidance regarding documents that must be maintained in the case file before closing the case, including documentation of the university's initial assessment of the allegations and its rationale for whether or not to conduct an investigation.</p>	<p><b>Fully Implemented</b></p>

# State Auditor's Recommendations

<p><b><u>Recommendation #13:</u></b> Establish a process to regularly collect and analyze sexual harassment data, including patterns, trends, and data on the timeliness of investigations systemwide.</p>	<p><b>Partially Implemented</b></p>
<p><b><u>Recommendation #14:</u></b> Create a policy for compliance reviews: all universities will now be audited by the Chancellor's Office at least every three years to ensure compliance with the above policies among other items.</p>	<p><b>Partially Implemented</b></p>
<p><b><u>Recommendation #16:</u></b> Amend the systemwide policy for letters of recommendation to prohibit official positive references for all current or former employees with findings of sexual harassment, including those who received less severe discipline than termination, or to require that such letters include a disclosure of the employee's violation.</p>	<p><b>Fully Implemented</b></p>

# Creating a Culture of Care, Accountability, & Transparency

- Created a Systemwide Office for Civil Rights at the Chancellor's Office
- \$15.9 million 2024-25 investment
- Implemented new Systemwide Nondiscrimination Policy
- Implemented new retreat rights policy
- Implemented new letters of recommendation policy
- Increased staffing at the system and university levels
- Established uniform standards
- Created training programs
- Developed more robust data collection and tracking systems