

CSU Chancellor's Office Civil Rights Program Review Summary Report

I. BACKGROUND AND INTRODUCTION

The California State University ("CSU") promotes a safe learning, living, and working environment through its educational programming and systemwide policies and procedures. The CSU prohibits Discrimination and Harassment on the basis of a Protected Status, including Sex-based Harassment and misconduct, in accordance with the Nondiscrimination Policy.¹

To ensure compliance with the Nondiscrimination Policy, the Chancellor's Office regularly reviews the civil rights² programs of each university campus. In partnership with the Office for Civil Rights Programming & Services at the Chancellor's Office, five university campuses participated in a program review in Fall 2024: Chico State, Cal Maritime, CSU Bakersfield, Cal Poly Pomona and Cal State Long Beach. This memorandum details the systemwide observations and findings from the review process, including recommended best practices and patterns for continued areas of growth.

Review Objectives

The objective of a program review is to determine whether a university's practices align with the Nondiscrimination Policy, state and federal law, and best practices for identifying, preventing, and addressing Discrimination and Harassment, including Sex-based Harassment and misconduct. The reviews highlight the strengths, achievements, and positive strides made by university campuses with respect to their civil rights programs and services and provide an opportunity for the Chancellor's Office to adopt and implement best practices across the CSU system. Reviews also help the Chancellor's Office identify areas where university campuses may benefit from additional guidance or support.

Review Criteria

Civil rights program reviews evaluate the Title IX/DHR program's effectiveness responding to concerns of Discrimination and Harassment, and its consistency applying the Nondiscrimination Policy by using a defined set of criteria which provide a benchmark for measuring progress over time (maturity indicators) in the following areas:

1) Leadership and Oversight

¹ [CSU Nondiscrimination Policy](#)

² Title IX and Discrimination, Harassment, and Retaliation (DHR)

- 2) Policies and Procedures
- 3) Training and Education
- 4) Reporting Protocols or Mechanisms
- 5) Resolution and Discipline
- 6) Monitoring, Response, and Prevention

II. SELF-ASSESSMENT SURVEY

In advance of the scheduled on-site review activities, each university received and completed a Self-Assessment Survey, designed to gather basic information about campus Title IX/DHR programs, services, and operations. A copy of each university's response to the Self-Assessment Survey is on file with the Chancellor's Office.

III. UNIVERSITY ON-SITE VISIT

A Chancellor's Office Representative, the Systemwide Senior Director for Civil Rights ("Systemwide Director") visited each university over multiple days during the Fall 2024 semester to conduct review activities and interview relevant campus stakeholders.

Review Methods

As part of the civil rights program review process, the Systemwide Director:

- Reviewed the university's response to the Self-Assessment Survey.
- Conducted a pre-review meeting with the university Title IX Coordinator/DHR Administrator to discuss the Self-Assessment Survey response.
- Reviewed a sample of case files reflecting various forms of resolution.
- Reviewed of a sample of prevention education and training materials.
- Reviewed any resource documents/guides provided by the Civil Rights Office to the campus community.
- Reviewed the university Title IX/DHR webpage.
- Interviewed individuals from the university campus who are directly responsible for Title IX/DHR oversight and compliance.
- Interviewed individuals from the university campus who partner and work closely with the Title IX/DHR office to ensure compliance with the Nondiscrimination Policy.

While each university's organizational structure is unique, and titles may differ, the Systemwide Director met with the following university stakeholders:

- Title IX Coordinator/DHR Administrator
- Deputy Title IX Coordinator(s)
- Title IX/DHR Investigator(s)
- Title IX/DHR Intake Coordinator

- Prevention Education Coordinator(s)
- Additional Title IX/DHR Office Staff, as identified by the Systemwide Director
- Student Conduct Administrator
- Chief of Police or designee
- Confidential Sexual Assault Victim Advocate
- Respondent/Complainant Advisor (if available at campus)
- Athletics Director
- Deputy Title IX Coordinator for Athletics
- Director for Residential Life
- Administrator with oversight for Fraternity/Sorority Life
- Associate Vice President for Human Resources or Director of Human Resources
- Associate Vice President for Faculty Affairs/Academic Personnel
- Campus partners who facilitate prevention and education programming
- University Counsel
- Students
- Other individuals designated by the university.

The results of the program reviews have been summarized in this systemwide report.

IV. OBSERVATIONS AND FINDINGS

A. Leadership and Oversight

The first review category covers leadership and oversight of the civil rights program, including staffing, budget and resources, training and professional development for the Civil Rights Office, and campus partnerships and appropriate information sharing.

Across all five university campuses, there are consistent patterns of engaged leadership and efforts to ensure compliance with civil rights policies. Senior leadership is actively involved, with regular support and commitment to ensuring that Civil Rights Offices have the necessary resources and authority to function. At two university campuses, the Title IX Coordinator / DHR Administrator reports directly to the president, while at the remaining three, the Title IX Coordinator / DHR Administrator reports to a Vice President, who is a member of the president's cabinet. Active leadership involvement ensures that civil rights policies are prioritized at the highest levels of the institution.

Best practices: Chico State was recognized as an exemplar campus for the unwavering commitment of its executive leadership team. The president has shown personal support for the Civil Rights Office by raising Title IX and DHR issues during town hall meetings, participating in campus safety meetings with the University Police Department, and by personally sending out campus-wide communications whenever the Civil Rights Office has an

awareness event. The president and cabinet members have actively participated in some of these events such as the Wear Purple event supporting Domestic Violence Awareness Month in October 2024 and a Sexual Assault awareness campaign conducted in April 2024. Executive leadership's participation and visibility at these events and supportive messaging have been very helpful in raising credibility and awareness around critical civil rights topics. The engagement and support of the executive leadership at Chico State serves as an exemplar for other university campuses.

Areas of Growth: While executive leadership at each university is generally supportive and engaged, this area could be strengthened by ensuring structured interactions and opportunities for cabinet members to regularly interact with the Title IX Coordinator / DHR Administrator and through public-facing actions that promote the civil rights program and reinforce the university's commitment to providing a campus environment free from Discrimination, Harassment, and Retaliation. Examples of such opportunities might be having executive leadership participate on campus committees or task forces relating to civil rights; sending joint messaging or other strategic communications to promote reporting and inform the campus of Title IX/DHR resources; active engagement in efforts to enhance completion of annual Sexual Harassment prevention training; and encouraging participation or attendance at campus events sponsored by the civil rights program.

Staffing, Budget, and Resources

The program review revealed that staffing and resource allocation continue to present key challenges, as many Civil Rights Offices struggle with high workloads, understaffing, and the need for more comprehensive funding to meet growing demands. Stakeholders interviewed during the review acknowledged both the tremendous workload and dedication of civil rights team members, while also noting the impact that long case resolution times and understaffing has on the campus community. Importantly, most campuses have developed recruitment and staffing plans with funding allocated to address these specific challenges.

Best practices: Where staffing challenges were identified, the Chancellor's Office recommended that the university follow its current hiring plans. To assist with the workload, as new staff members join civil rights teams, universities may wish to consider designating areas of specialization and cross-train within teams. For example, instead of having investigators who also conduct intake, provide supportive measures, send status updates, and schedule interviews, hiring an intake coordinator or case manager to assist with more administrative tasks would allow investigators to focus on investigation work and more readily bring matters to conclusion.

Areas of growth: On several campuses, challenges persist with the hiring or retention of trained investigators. The universities then contract with external investigators, which can lead to high external investigation costs. Reducing reliance on external investigators and building

internal capacity is a cost-effective and efficient solution. For universities with a smaller case load, they may consider a cost-share model. This could be achieved by contracting with another university for investigation services to help reduce costs and maintain workloads. Where the hiring of external investigators is unavoidable, universities should reference the *Guidance for Title IX / DHR Practitioners on the Retention of External Investigators*.

Training and Professional Development

The program review highlighted the various trainings and professional development opportunities provided to civil rights team members throughout the system, both online and in-person, including trainings facilitated by T9 Mastered, the Association of Title IX Administrators (“ATIXA”), the Association of Workplace Investigators (“AWI”), Clery Center, and the National Association of Student Personnel Administrators (“NASPA”). Professional development opportunities of particular note include the Forensic Experiential Trauma Interview training that all staff members in the Civil Rights Office at Cal State Long Beach complete and a three-day training on Neurodivergence hosted by Stanford University that staff members at Cal Poly Pomona completed.

Each university also referenced the training and professional development provided by the Chancellor’s Office, including through the Annual Civil Rights Conference and monthly Systemwide Civil Rights meetings. Finally, many Civil Rights Offices provide memberships in or subscriptions for professional organizations centered on Title IX and/or DHR compliance, including ATIXA, AWI, or the SUNY Student Conduct Institute. These are worthwhile and small investments that can pay dividends for civil rights practitioners to have access to timely training, templates, best practices, and resources in ever changing and emerging topic areas.

Campus Partnerships and Appropriate Information Sharing

Collaboration with other campus departments and external partners is also critical for effective civil rights programming. Interviewees, who represented nearly every aspect of campus life, praised the Civil Rights Office at each University for their outreach, communication, and collaboration.

Best practices: The program reviews highlighted that each university utilizes various multi-disciplinary teams (“MDT”) to monitor and address cases, identify gaps in services, and ensure effective communication. These MDTs vary in composition depending on the nature of the issues to be discussed, which demonstrates the balance between information sharing and privacy related concerns. For example, student cases involve student facing departments while employee cases involve Human Resources, Faculty Affairs, and Employee Relations. While the names of MDTs vary between campuses, to the extent that the teams meet regularly to facilitate the development of shared fluency and knowledge among key university partners related to the Nondiscrimination Policy, equitable processes and supportive care, the team

functions as an MDT and is in alignment with Chancellor's Office expectations. MDT members relayed that they can readily reach the Title IX Coordinator / DHR Administrator about specific matters or cases as needed between meetings and uniformly expressed appreciation and respect for the civil rights staff.

Areas of growth: The review also found areas that require strengthening, such as collaborative training for University Police Department personnel. Potential topics include the role of the Civil Rights Office, its intersection with the work of law enforcement, reporting obligations, the CSU Nondiscrimination Policy, trauma informed principles, referrals, and the role and services of the Confidential Advocate. Another area of growth that was highlighted was for cases involving faculty respondents. Interviewees shared that there are sometimes lapses in response times and communication, and that consistency can be difficult with rotating leadership in faculty positions.

B. Policies and Procedures

The second review category covers the implementation of policies and procedures, including reporting mechanisms, policy distribution and information sessions, and resource creation. The CSU benefits from having a systemwide Nondiscrimination Policy and all five campuses have developed structures to ensure that students, faculty, and staff understand their rights, options, and responsibilities under the policy.

The Chancellor's Office recently shifted to a leadership and oversight model that is new and quickly evolving. This includes providing written guidance and best practices for the system, which take time for each university to implement. Campuses under review demonstrated the adoption of effective strategies for compliance in a fluid environment, including weekly meetings, maintenance of universal templates, and regular consultation and advice from the Chancellor's Office.

Reporting Mechanisms

The program review highlighted that each university has worked to create reliable reporting mechanisms, however, there are some challenges in ensuring that all community members are aware of these options and equipped to use them.

Best practices: In line with best practice, both Cal Poly Pomona and Cal Maritime offer several reporting mechanisms for Title IX and DHR concerns. Each university has an online Title IX/DHR Reporting Form that generates an incident report through the case management system, which is then routed to the Title IX Coordinator / DHR Administrator. The form is publicly accessible (i.e., there is no log-in requirement), clear, and appropriately balances required and non-required (optional) information. The form also allows for anonymous

reporting and appropriately notes that an anonymous report may impact the university's ability to respond to the complaint. Reports may also be made in-person, by email, or by phone. Appointments may be scheduled with the Title IX Coordinator / DHR Administrator via a QR code, made available via posters distributed throughout the campus and on the campus website. The QR code and wide availability of posters throughout the campus is a best practice that may serve as an exemplary and model for other university campuses.

Areas of Growth: While various reporting mechanisms have been established, university campuses should ensure that reporting options are prominently displayed on the civil rights website. This includes a link to online reporting forms, information about how to contact Title IX / DHR staff, including by phone, email, or in-person appointment availability. In addition, the website should include clear instructions for how to file a complaint.

Policy Distribution & Information Sessions

Title IX requires that universities publish a Notice of Nondiscrimination as well as adopt and publish procedures that provide for the prompt and equitable resolution of student and employee complaints alleging any actions prohibited by Title IX. The webpage for each university meets these minimum requirements. The CSU is also required to distribute its Nondiscrimination Policy to all students, faculty, and staff, which was also timely completed by each university. Each university also demonstrated that the Nondiscrimination Policy was distributed through a variety of formats, including email, printed materials, and on the university website. Additionally, regular information sessions are held with students and staff, such as during student orientation and faculty meetings, to ensure regular exposure to the CSU's policies and procedures.

Each university must also annually provide the Notice of Nondiscrimination and publish the Title IX Coordinator's information to applicants for admission and employment. At two campuses, there was a compliance gap in providing this information to applicants for admission. Both universities were required to immediately address this compliance area and submit a status update to the Chancellor's Office upon completion.

Resource Creation

A particular area of strength across the programs under review included the creation of clear and accessible resources for the campus community. Overall, Civil Rights Offices worked to improve transparency, access, and understanding of policies and procedures. University campuses can continue to improve in this area by simplifying language and targeting resources to specific groups within the community.

Best practices:

- Cal State Long Beach was recognized for its short, informative, and engaging videos with respect to the practical aspects of engaging with the Civil Rights Office. For example, one video explains the role of the Confidential Advocate while another explains a complainant's process options, including formal investigation or requesting supportive measures. Other resources engage students in a Q & A session covering the fundamentals of Title IX and Affirmative Consent. The videos range from two to five minutes and contain practical and easy to understand information tailored to students and staff who wish to learn more about their rights and options. These approaches are exemplary for strategies to create approachable and informative content.
- Cal Poly Pomona was recognized for the creation of a wallet-sized resource card with information on what to say and do when someone makes a Title IX-related disclosure, including the responsibility to report disclosures to the Title IX Coordinator as well as contact information for on- and off-campus confidential resources. The wallet card serves the dual purpose of reminding employees of their obligations to report and provides tips for responding to disclosures. The wallet card also serves as a discreet and straightforward resource that can be provided to the individual making the disclosure. University partners from across the campus described the benefits of having these resource materials readily accessible and providing them with reporting parties and potential complainants. This is an effective and engaging strategy for providing timely, discreet information to individuals in need.
- Cal Maritime was commended for its efforts in working to increase employee fluency and confidence in their reporting obligations through the use of scripts and information to provide when responding to disclosures from students, as well as a syllabus statement template for faculty to include in their syllabi to ensure students are informed regarding employee reporting obligations. These resources are readily publicized by the Civil Rights Office and well known among leadership and campus partners. The campus has also created several reporting flowcharts, including reporting incidents on-campus, on Training Ship *Golden Bear*, during sea training, international experience and during an internship. These flowcharts are available in digital format online and printed copies are prominently displayed throughout campus. The flowcharts are easy to read and understand and are an excellent resource for the campus community.
- CSU Bakersfield was commended for the creation of a civil rights flowchart that explains the steps in the reporting process from the filing of a formal complaint through conclusion of the matter. The flowchart is easy to follow and effectively outlines the investigation and hearing timeframes, as well as the right to and timeline for appeal. While the flowchart was slightly outdated due to a recent Nondiscrimination Policy

update in August, the campus had plans to revise the resource. The resource itself is an excellent and easily digestible way to share critical information with students and employees.

Areas of growth: While each campus had excellent resources, many were print, or paper based. University campuses may benefit from the addition of more user-friendly platforms for distributing information to help increase engagement with the campus community. Students are accustomed to consuming information through multimedia, making formats such as video more relatable and effective in conveying messages. Research has shown that electronic formats are often more engaging and effective than traditional text formats. They can capture and retain attention through dynamic visuals, animations, and storytelling. Furthermore, formats other than text are typically easier for students with varying literacy levels or learning styles to understand, ensuring broader reach and inclusiveness. Formats such as videos can condense complex information into digestible, straightforward presentations, making it quicker for students and others to grasp key points and may be more easily shared and accessed on mobile devices, social media, or learning platforms, fitting into students' digital consumption habits. This could include linking to information or videos via a QR code. In addition, for print or paper-based materials, it is recommended that the materials be reviewed for clarity to ensure they are easier for the general public to understand. They are sometimes in legal or academic language, which may not be accessible to everyone. Simplifying these materials and using plain language could improve understanding and engagement.

C. Training and Education

The third review category covers training and education for students and employees, including required training and monitoring, training for specific populations, and prevention education practices. Each university requires trainings for employees and students and monitoring mechanisms in place to ensure compliance. However, it was rare for campuses to have high compliance rates for students and employees. To be impactful, training programs must be both widespread and tailored to meet the unique needs of different groups on campus. There is a growing recognition of the need for specialized training, particularly for specific populations such as student-athletes, international students, students living on-campus in residence halls and staff in key positions. Overall, each university had a focus on making these educational programs accessible, relevant, and engaging for everyone in the campus community.

Required Training & Monitoring

The CSU requires all students to complete comprehensive online Title IX discrimination and harassment training every year. The CSU also requires new employees to complete online Title

IX prevention and education training within three months of their initial date of hire and current employees to complete training annually.

Student training

Title IX prevention and education programs are generally considered most effective if offered to new students early in the semester. A majority of campus sexual assaults are known to occur within the first 90 days of the fall semester and female students are statistically most at risk of experiencing sexual misconduct during this time period in their first year. Early prevention training and education also helps ensure all students know from the outset of their time at the campus what their rights are what to look out for, and where to turn if they witness or experience an incident of sexual misconduct, dating violence, domestic violence, or stalking.

Best practices: Student completion rates are generally high across the CSU. At CSU Bakersfield, student registration is tied to completion of their online training, which ensures a 100% completion rate. Many campuses include an in-person component with online training. Cal State Long Beach has a comparable completion rate at 99% through the university's new student orientation program. All new students must complete this program before they can come to campus and participate in orientation. Because orientation is scheduled immediately before the start of the semester, this also ensures students receive this information when it is likely to be most effective. Universities have also created strategies to help achieve higher completion rates. For example, at Cal Poly Pomona, Academic Advisors also remind students of their training requirements, which is another effective strategy to encourage completion.

Areas of growth: At least one university under review had significant challenges with student training completion rates. Interviewees disclosed that incoming students are told by existing students that there is no need to complete the online Title IX training, which resulted in a disappointing student completion rate of 29 percent. In addition to strategies adopted by other campuses, the university was provided information about potential options to incentivize student participation, such as entrance into a drawing for a free parking pass, gift cards, or other prizes; eligibility for a scholarship or tuition discounts; receipt of priority registration; discounted tickets to campus events; creation of friendly competitions between student groups with prizes for high participation rates; pairing training with social events such as pizza night or movie night to make the experience more enjoyable. The goal should be to make training feel like less of an obligation and more of an opportunity, resulting in increased student participation and fostering a culture of compliance and awareness. This may also be an opportunity for the university to partner with its student leaders to help make this cultural shift.

Employee training

Employee training completion rates are more varied, with Chico State being recognized for their high employee completion rate of 96 percent. However, one university had an employee

completion rate of only 77 percent, which is one of the lowest employee completion rates across the CSU system. Universities with higher completion have adopted effective strategies to monitor progress and ensure compliance. For example, one campus sends a list every other month to supervisors identifying employees with overdue training. The campus also sends a reminder email to each employee with overdue training every other month. As a result, an employee with overdue training receives a reminder every month about completing their training. Each university should adopt a robust tracking and monitoring system to ensure that all employees complete the necessary training on time.

While new employees are assigned training to be completed in the first three months of hire, this deadline is not always achieved. However, most campuses supplement online training with an in-person orientation for new hires. For example, at Cal Maritime, new hires attend a two-day, in-person orientation, during which the Title IX Coordinator / DHR Administrator provides a 45-minute session about responsible employee reporting obligations, so they immediately receive this information upon hire.

Interviewees expressed appreciation for department-specific, small-group in-person training with interactive exercises and real-time feedback, which is regarded as being more effective than the existing online training. For example, Cal Poly Pomona utilizes a social theater group, Pure Praxis, to facilitate interactive training sessions using customized, scripted realistic scenarios and engagement with the audience to analyze the scenario and suggest intervention strategies. Interviewees, including students who participated in the training, expressed that it was a welcome addition and supplement to traditional methods of training, especially on difficult topics involving Discrimination and Harassment.

Training for Specific Populations

In addition to facilitating annual online training for all students and employees, each university has a targeted, annual in-person training for various campus stakeholders, such as athletics, student leaders, student clubs and organizations, residence hall advisors, fraternities and sororities, or other specific populations. Providing targeted training helps empower these groups to take proactive roles in promoting a safe campus environment. The training courses are informative and use specifically tailored materials for the university's students and employees. In addition, campuses supplement these trainings with other events, tabling, or presentations.

Best practices:

- At CSU Bakersfield, the Civil Rights Office collaborated with the Athletics Department and other campus partners to develop a specialized program for male student athletes

about male sexual assault and consent. The program has been well-received and was spoken about very highly by all familiar with it.

- At Cal Maritime, the Civil Rights Office has created specialized training for employees prior to embarking on Training Ship *Golden Bear*. Employees who are involved in training cruises attend additional training, consisting of a one-hour, in-person session with the Title IX Coordinator / DHR Administrator and other required virtual training. Completion of this training is monitored and tracked by the campus. This strategy is one that could be adopted for other specialized groups, such as international programs, on-campus residents, or academic cohorts in specific educational programs.

Areas of Growth: On several campuses, interviewees identified limitations on the Civil Rights Office's ability to provide targeted training for faculty groups or departments beyond annual requirements, because mandatory training must be collectively bargained. This can impact the Civil Rights Office's ability to address recurring areas of concern effectively and proactively with respect to faculty departments in the same way it can preemptively address areas of concern among the university's student population. To encourage engagement from bargaining unit employees, universities should consider hosting voluntary "brown bag" or "constructive conversation" lunches for employees to facilitate educational and prevention discussions. The Civil Rights Office may also partner with university leadership to incorporate brief training sessions into other campuswide activities where faculty and staff will already be in attendance. Training promotes CSU and community values, including a commitment to equity, safety, and inclusivity on campus. Peer advocacy can also be an effective strategy by enlisting respected faculty or union leaders to advocate for the training and share its value with their peers. These training courses can also be shared as professional development opportunities that provide faculty with tools to better support students and colleagues. Campuses may consider recognizing participation by offering certificates or acknowledgment of completion that faculty can add to their professional profiles. The university should offer scheduling flexibility by providing training sessions at various times, including online options, to accommodate busy faculty schedules. Finally, Civil Rights Offices could leverage shared governance by engaging faculty senate or similar governance bodies to endorse the training and integrate it into institutional expectations.

D. Reporting Protocols or Mechanisms

The fourth review category covers reporting protocols or mechanisms, including visibility and accessibility of the Civil Rights Office and support for participants in the Title IX and DHR process. The review of the civil rights programs across the five campuses reveals a strong emphasis on making the Civil Rights Office more visible and accessible to all students, faculty, and staff. There is a clear pattern of campuses improving their outreach strategies and creating more opportunities for community engagement. Websites and other online platforms

are also increasingly becoming central hubs for information. However, some campuses still face challenges in ensuring full visibility and accessibility on their webpages. Support for participants in the Title IX and DHR process is another area where campuses are working to provide better services, but further enhancements in the resources available for both complainants and respondents are needed.

Visibility and Accessibility of the Civil Rights Office

Information gathered during the review process about the visibility and accessibility of the Civil Rights Office was mixed. The location of the Civil Rights Office for three of five campuses met the needs of the community and offered an appropriate balance of accessibility and privacy. The Civil Rights Office for one campus is located in the Office of the President, which helps promote the importance of the office. However, review participants expressed concern that the location could also be a barrier to reporting as the layout of offices and workspace do not afford privacy to anyone entering the building. Participants also noted that walking into an office suite that houses the university president can feel intimidating for many people, and students especially may forego seeking help rather than visit the office. At the time of the review, another campus was in the process of relocating the Civil Rights from its current location to the Student Services Building. Review participants reported that the current office location had a locked entry door and glass window at the front entry, which are strong deterrents to reporting parties. In addition, the interior conference room where most intake meetings take place is also perceived to be a cold and intimidating space with a large conference table and television with a camera facing the table, making reporting parties fear they are being tape-recorded.

Despite challenges with physical office locations, participants from each university indicated that the Civil Rights Office has significantly increased its level of visibility across the campus and reported an increased awareness of the office, its role and services among the campus community. There is demonstrable evidence that Civil Rights Offices have worked hard to gain the respect, trust, and engagement of the campus community.

Best practices: At Cal Maritime, information about the Civil Rights Office and the Confidential Advocate are posted prominently around the campus, including in the residence halls. Appointments can also be scheduled with the Title IX Coordinator / DHR Administrator using a QR code, which is available via posters on campus. Interview participants shared their positive experiences with the availability, accessibility, and collaborative approach of the Title IX Coordinator / DHR Administrator, who operates an “open door” policy. The easy access and availability of the Title IX Coordinator / DHR Administrator is a recognized best practice.

Areas of growth: The physical location of the Civil Rights Office is an important consideration in removing barriers to reporting for students and employees. This requires a careful balance between providing an accessible location and ensuring privacy for individuals who need to visit

the office. Intake or meeting rooms should be created to be inviting, such as including comfortable chairs and a small table versus a large conference room. The office design may benefit from a walled partition or other private area where students and employees can be out of sight when they walk in, wait for appointments, or have a private area to calm down if they are in distress. It is also recommended that Civil Rights Office staff put their photos on the website, so that the campus community knows who they are and becomes familiar with them. Another idea is to create an introductory welcome video on the website showing the office environment so that reporting parties know what to expect in advance.

Website Presence

Each university has a highly accessible website dedicated to Title IX and DHR resources, where students and employees can find information on how to report incidents, support services available, and how to navigate the process. The websites are clear, easy to navigate, and contain updated resources. Many websites also include educational resources and substantive content, FAQs, and detailed information about CSU's civil rights policies. This approach helps keep the community well-informed.

Each university is also required to include the contact information for the Title IX Coordinator / DHR Administrator. Only one campus website needed to be updated with the physical address of the Title IX Coordinator.

Best practices: Cal Poly Pomona's website also includes information about the required trainings and an online form for requesting customized presentations and trainings from the Civil Rights Office. Importantly, the webpage also includes a trauma-informed best practice of prominently displaying a one-click "Exit Site Quickly" box in red.

Areas of growth: Two university campuses were required to review the requirements of AB 1968 to ensure that information on the website includes the steps a victim/survivor of a sexual assault might take immediately following the sexual assault. While both campuses included this information on the University Police Department webpage, it should also be included on the Title IX/DHR webpage. Both universities were required to address this compliance area and submit a status update to the Chancellor's Office upon completion.

Support for Participants in the Title IX/DHR Process

Support systems for both complainants and respondents are integral to the success of civil rights programs and services. Complainants are supported in the process by Confidential Advocates and Respondents are supported by Advisors. Ongoing improvements in these areas, particularly in the availability of Confidential Advocates and resources for Respondents, will ensure that all individuals are well-supported.

Confidential Sexual Assault Victim Advocate

Confidential Advocates work directly with students and employees who have been impacted by Sex-based Discrimination and Harassment. They receive referrals from the Civil Rights Office, as well as other campus partners such as the University Police Department. Confidential Advocates provide a variety of support services, including guidance and assistance with supportive measures, information about emergency medical care and follow-up medical care, information about medical forensic or evidentiary examinations, crisis intervention and on-going counseling (including referrals to mental health services and other agencies providing long-term counseling), information on rights and options for university administrative processes as well as criminal processes, information on legal services and accessing restraining orders, and attendance as an advisor/support person during criminal proceedings and university proceedings such as intake meetings, investigation interviews and hearings.

Each university under review has at least one Confidential Advocate assigned to work with students and employees. Three universities had Confidential Advocates on staff while two universities contract for services through a local rape crisis center. At the time of the review, one university that contracted for services was without the benefit of a Confidential Advocate due to a recent resignation. The university was working on securing support for the campus in the interim.

Best practices: At Chico State, the business card for the Confidential Advocates has a QR code (also found on the Title IX website) providing access to information about available resources. The business cards for the University Police Department include the same QR code. The use of the QR code is an innovative best practice that helps the campus community easily access resources available to them.

Areas of growth: The Confidential Advocates have created scheduling and intakes forms that are available on the Student Health Center webpage. To help improve accessibility and connection to the Civil Rights Office, this intake and scheduling form could also be included or linked to the Title IX and DHR webpage.

Respondent Resources

Respondent Advisors support individuals who have been accused of misconduct during the complaint and investigative process. Their role includes helping the Respondent understand the process and connecting them with available supportive measures, including referrals to mental health services and other agencies providing long-term counseling, information on rights and options for university administrative processes, and attendance as an

advisor/support person during criminal proceedings and university proceedings such as intake meetings, investigation interviews and hearings.

Best practice: Both Cal Poly Pomona and Cal State Long Beach have established a program for Respondent's Advisors (known as Support Advisors at Cal Poly Pomona and Campus Process Advisors at Cal State Long Beach). The Advisor team is comprised of university administrators who have been trained in trauma-informed practices.

Areas of growth: Three of the five universities under review did not have a Respondent Advisor program. This is a critical area of need across the CSU system and one that should be prioritized. Once a Respondent Advisor program is established, it is also critically important that the Advisors are routinely trained on trauma-informed practices, de-escalation techniques, available supportive measures, and the Nondiscrimination Policy and Procedures to help Advisors feel better equipped to assist parties navigating the complaint resolution process. Any Respondent Advisor program should include university administrators who are able to support students and employees.

E. Resolution and Discipline

The fifth review category covers resolution and discipline, including the observations from the file review and case management system, and review of student and employee discipline. Across the five campus program reviews, there is a shared focus on handling reports and complaints efficiently, ensuring that the resolution process is fair and transparent. The campuses reviewed have established various systems to manage cases, including robust case management tools. However, challenges remain in the consistency and speed of resolution. While best practices have been identified, there continues to be room for improvement in how cases are tracked, documented, and resolved.

Observations From File Review and Use of Case Management System

Each Systemwide Director reviewed approximately 20 randomly selected case files involving Title IX and DHR allegations against students and employees. A primary focus was to ensure that documentation was complete and that cases were processed in a reasonably timely manner. In addition, a focus was placed on ensuring that Notices of Investigation consistently included information about supportive resources, the right to an advisor, timelines and next steps, informal resolution, appeal rights, and protections against retaliation. It is also important to note that the program review process involved the review of case files from the 2023–2024 academic year, which was a transitional year for the Chancellor's Office. While there was substantial written guidance created over this time, much of that guidance was distributed to university campuses in 2024.

Upon review of the files, universities generally ensured that impacted parties received an outreach communication from the Civil Rights Office within 24-business hours, which is an expected standard. In many cases, impacted individuals received outreach communications within hours, which is outstanding. However, in reviewing some files, it was difficult to ascertain the exact timeline from when a report was received and when outreach was made. At least one university under review was implementing a new case management system and some files and documents had not yet been transitioned to the case management system.

With respect to timeliness to complete investigations with findings, results varied. While some investigations were completed within a few months, others took as long as 11 months to complete. Generally, investigations that took longer to complete involved complicated fact patterns, delays related to the parties' availability, and expansive investigative efforts; however, this was not always the case. Case files also reflect that universities provided status updates to the parties. At one university, the case management system reflected that the parties were updated, however, the written status update was not reflected in the case file. It is expected that as universities increase their staffing, case processing times will also improve.

Overall, case files reflected improvement over the academic year and following issuance of Chancellor's Office Guidance in the program's timeliness across all areas, including initial outreach, follow-up, issuance of Notices of Investigation after receipt of complaints, and in its investigation processes. As the Chancellor's Office implements a unified case management system, standardizing case documentation processes will further improve consistency and allow for more efficient tracking and reporting.

Discipline

The program review process also examined case files to determine whether corrective or disciplinary action was appropriately administered by the university and that the case file was complete. Overall, a review of the case files for each university demonstrated that campus administers appropriate discipline in cases involving a violation of the Nondiscrimination Policy. The records reflect appropriate collaboration with different stakeholders across campus, including Student Affairs, Human Resources, Employee Relations, and Faculty Affairs to determine appropriate and consistent remedial action and implement discipline in a timely manner. However, while case files involving adverse findings against a party routinely included correspondence with relevant campus partners confirming that appropriate discipline was administered, some files lacked formal disciplinary letters to the parties and consistent updates regarding disciplinary proceedings. Universities were reminded to follow the Chancellor's Office *Guidance on Case File Documentation and Continuing Oversight of Employee Discipline*, which includes ensuring the disciplinary documents are added to the case files.

F. Monitoring, Response, and Prevention

The sixth and final category under review included university record keeping and prevention efforts. Maintaining proper records and implementing effective prevention strategies are central to ensuring compliance with civil rights policies. There is a strong emphasis on documenting every step of the complaint and resolution process, which is essential for transparency, accountability, and the ability to track trends over time.

Each university under review had a case management system that they used to document, monitor, and track cases. This includes utilizing a centralized online reporting form. The reporting form is widely distributed through outreach, training, marketing, and email communications. While significant progress has been made, campuses still face challenges in ensuring that records are properly maintained. For instance, case records may lack consistent detail, or there may be delays in updating the records. University campuses should focus on improving the quality and consistency of record-keeping by better training staff on the use of case management systems and ensuring all steps in a case are recorded accurately.

Importantly, university partners use the same system which allows cross collaboration on cases that involve multiple departments and are extremely efficient. There was some concern expressed with respect to the newly selected systemwide case management system because it is different than the case management system most university campuses utilize. There is a particular concern about reduced efficiency if other campus partners are not also on the same system. This is an area that the Chancellor's Office and campus implementation partners will have to navigate during the upcoming transition to the new case management system.