

STRATEGIC OPERATIONS PLAN

OFFICE FOR CIVIL RIGHTS AND
TITLE IX EDUCATION AND COMPLIANCE

2023-2024 ACADEMIC YEAR



Introduction

The Office for Civil Rights and Title IX Education and Compliance (OCR), established as an independent unit in 2018, encompasses the following areas: (1) Prevention, Outreach, and Education Department (POE), (2) Office of Institutional Equity (OIE), (3) Office of the ADA Coordinator, (4) Resolution Office (RO); (5) Equity Review Officer (ERO); and (6) Office of Support and Equity. Collectively, our purpose is to lead the university's prevention and response to relationship violence, sexual misconduct, stalking, discrimination, and harassment based on age, color, gender, gender identity, disability status, height, marital status, national origin, political persuasion, race, religion, sexual orientation, veteran status, and weight, ensuring equal access to employment and the University's programs, services, and activities.

Through its own educational efforts and in collaboration with many campus community partners, OCR seeks to recognize and work to redress systemic inequities in policies and programs that serve as barriers to equal opportunity. Additionally, OCR seeks to advance inclusivity, equity, and positive culture changes that are grounded in the values of safety; well-being; mutual respect; dignity; responsibility; and clear and timely communication. This commitment includes engaging the campus community to support antidiscrimination efforts.

This Strategic Annual Operating Plan outlines five key objectives that OCR is undertaking in the 2023-2024 academic year to further OCR's commitment to redress systemic inequities and advance positive culture changes within MSU. This plan is in addition to and aligns with the MSU 2030 Strategic Plan, the Relationship Violence and Sexual Misconduct Strategic Plan, and the Diversity, Equity, and Inclusion Steering Committee Plan.

OUR MISSION

To educate all campus community members regarding how to prevent, identify, and report all forms of discrimination and harassment; to monitor complaints of discrimination, harassment, and gender-based violence; to conduct a fair and equitable investigation and resolution of complaints formally or informally; to use information from monitoring and investigations to inform prevention education; to remove barriers to accessing programs, services and activities; and to connect those affected by discrimination, harassment, and gender-based violence with campus and community resources.

OUR VISION

To create a safe, inclusive, and accessible environment that is free of discrimination, harassment, and gender-based violence through education, support, response, and resolution.

OUR VALUES

Integrity

- We strive to build trust by conducting our work in an honest, prompt, and responsive manner.
- We approach our work objectively.
- We align our actions and our words.
- We commit to being transparent in our processes, programs, compliance, and reporting.

Respect

- We seek to create a culture of communication.
- We commit to communicating in a trauma-informed, identity-conscious, and culturally competent manner.
- We support accessibility in all forms.

Collaboration

- We model mutual support in a constantly changing environment.
- We work together to maintain clear communication across offices, internally and externally, and support efficient processes.
- We engage with others in a way that seeks understanding and facilitates open communication practices.

Equity

- We are dedicated to practicing consistency in each part of the process for all stakeholders and MSU community members we serve.
- We work to be supportive and ensure that MSU is welcoming and accessible.
- We employ best practices in a way that supports individual needs.
- We commit to accountability for our own performance.

Excellence

- We practice recognition for our team's contributions toward programs, events, and activities that raise awareness in the community.
- We are dedicated to conducting timely, thorough investigations with attention to detail.
- We will continue to strive to be bold and innovative in our practice to better serve the MSU community and our stakeholders.
- We will honor our accomplishments, including being a national leader in accessibility and prevention programming.

OUR RESPONSIBILITIES

Anti-Discrimination Response and Investigation

Supports, responds to, and investigates reports related to discrimination and harassment on the basis of age, color, disability, ethnicity, gender, gender identity, height, marital status, national origin, political persuasion, race, religion, sexual orientation, veteran status, and weight under the Anti-Discrimination Policy (ADP) and the Notice of Non-Discrimination, Anti-Harassment and Non-Retaliation.

Relationship Violence, Sexual Misconduct, and Title IX Response and Investigation

Supports, responds to, and investigates relationship violence and sexual misconduct, including but not limited to, dating violence, gender-based harassment, sexual assault, and stalking under the Relationship Violence and Sexual Misconduct and Title IX Policy (RVSM).

Support and Equity

Assist individuals, such as claimants, respondents, or witnesses, who may be affected by relationship violence, sexual misconduct, harassment, and/or discrimination by facilitating supportive measures as well as adjustments for pregnant and parenting students.

ADA Coordinator

Facilitates the University's compliance with the Disability & Reasonable Accommodation, Anti-Discrimination and Web Accessibility policies, as well as Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the Americans with Disabilities Act Amendments Act of 2008, Michigan's Persons with Disabilities Act of 1975, and other laws and regulations prohibiting disability discrimination and harassment and ensuring equal access to the University's programs, services and activities for persons with disabilities.

Resolutions

Facilitates a fair and supportive hearing process following the conclusion of formal investigations conducted under the RVSM and Title IX Policy, issues thorough and unbiased decisions, and determines student sanction recommendations and referrals for employee discipline.

Equity Review

Provides a fair, neutral and supportive review of appeals that are filed in response to final determinations under the RVSM and Title IX Policy and the Anti-Discrimination Policy, as well as dismissals of formal complaints and emergency removals of students.

Prevention, Outreach, and Education

Empowering community commitment to prevent gender-based violence through education, outreach and social change.

Oversight and updates on MSU Policies

- Notice of Non-Discrimination, Anti-Harassment and Non-Retaliation
- Anti-Discrimination Policy
- Disability and Reasonable Accommodation Policy
- Web Accessibility Policy
- Relationship Violence and Sexual Misconduct and Title IX Policy
- University Reporting Protocol: Relationship Violence, Sexual Misconduct, and Stalking

OUR LEADERSHIP TEAM

The Office of Civil Rights and Title IX Education and Compliance is a dedicated team of highly qualified and focused individuals who approach their work with commitment and integrity. Please see the Office for Civil Rights and Title IX Education and Compliance website for a full staff directory: <https://civilrights.msu.edu/about/staff.html>.

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2023-2024 Strategic Annual Operating Plan Initiatives

The Office of Civil Rights and Title IX Education and Compliance (OCR) has been actively working towards improving policies, processes, and collaboration with campus partners. This Strategic Operating Plan outlines five key initiatives guiding OCR's work for the 2023-2024 academic year.

The following five initiatives are intended to enhance and solidify support for quality services in an intentional, impactful, proactive, and efficient manner for the benefit of MSU and the MSU community.

STRATEGIC INITIATIVES

Initiative 1: University Policy and Process Updates and Education

In response to legal and regulatory changes, recommendations from external consulting groups, and the Know More Climate Survey, OCR anticipates revising and implementing these policies and procedures that the office oversees:

- Relationship Violence and Sexual Misconduct and Title IX Policy and University Reporting Protocol: Relationship Violence, Sexual Misconduct and Stalking
- Anti-Discrimination Policy and processes further aligning with the University's DEI Strategic Plan
- Inaugural policy regarding parental leave and accommodations for Pregnant and Parenting Students will be created.
- Disability and Reasonable Accommodation Policy

- Web Accessibility Policy

Throughout this process OCR will be seeking out additional campus stakeholder feedback to ensure the community voice is reflected in key policy development and revisions. OCR is participating in National Association of Student Personnel Administrator's' Culture of Respect Initiative, a program that builds the capacity of educational institutions to end sexual violence through ongoing, expansive organizational change.

The Prevention, Outreach, and Education department inside OCR will head the creation and updating of relevant programming, education and campus collaborations regarding updates to policies and impacts across communities.

OCR is also reviewing supportive measures, advisor, advocate, and educational programming for claimants and respondents to improve current practices and programs.

In addition, OCR believes that the community should know more about OCR's challenges and achievements. OCR will be issuing an Annual Report this summer that will focus on the amazing people that make up OCR, highlighting the important work that is being done and the many changes that have been made, and acknowledging the work that still needs to be done to ensure a safe and inclusive campus environment.

Initiative 2: Improve Case Management System and Processes

OCR utilizes a case management system to document, track, and organize information related to investigations into alleged violations of the Relationship Violence and Sexual Misconduct and Title IX Policy (RVSMTIX) and/or the Anti-Discrimination Policy. The current case management system was purchased in 2019. As OCR has continued to evolve and its needs changed, it became apparent that a new case management solution was required to improve efficiency and case management overall. A new case management system will allow for better workflow internally and a better experience for parties externally. In addition, a new case management system will provide a new and improved public reporting tool.

The process of purchasing a new case management system began in late 2022. In early May 2023, the request for proposals was launched. Once the next solution has been identified, OCR will work with IT partners across the institution to connect the case management system to existing MSU campus systems. Internally, the OCR team will customize the system to align with the MSU campus as well as provide training for users. The new case management system will be used by case managers, investigators, supportive measures coordinators, resolution officers, and the equity review officer. Upon full implementation, the new system will allow OCR to serve the community with increased efficiency.

Initiative 3: Improve Web and Digital Accessibility Compliance

Providing accessible web and digital content for persons with disabilities is an integral part of MSU's commitment to diversity, equity, and inclusion. In December 2020, Information Technology and the ADA Coordinator's Office collaborated to form a team of student employees to proactively review MSU's highest priority websites. The web review team provides students with web accessibility training and work experience to enhance their job readiness and career opportunities upon graduation. In addition, the proactive review of websites by the student reviewers has led to the remediation of identified barriers and resulted in an increase in the accessibility of the University's websites.

In 2023, web review functions transitioned to the ADA Coordinator's Office. In addition, the ADA Coordinator's Office assumed responsibility for web and digital accessibility compliance with the hire of the University's Digital Accessibility Coordinator and Accessibility Review Coordinator. The Digital Accessibility Coordinator will lead strategic initiatives as it relates to digital and web compliance, including a new annual accessibility review process and revised Web Accessibility Policy. The Accessibility Review Coordinator will lead web accessibility review functions including responsibility for review and feedback for the annual accessibility review process.

The accessibility team looks forward to collaborating with colleagues across campus to identify and remove barriers to accessing websites and digital documents and platforms.

Initiative 4: Review and Implementation of Recommendations from Consulting Reports

OCR continues to work towards creating and maintaining a safe and inclusive campus environment by focusing on responding and resolving complaints in a prompt and equitable manner while providing the MSU community with prevention education. OCR strives to conduct this work in a trauma-informed manner. To support those efforts, MSU has engaged various external consulting groups over the past year, including Cozen O'Connor, Honigman LLP, Quinn Emanuel Urquhart & Sullivan LLP, and DCG Inc., to identify areas of opportunities to improve OCR's processes and response.

Throughout the 2022-2023 academic year, OCR staff participated in a process improvement project with DCG Inc. The DCG process improvement project assisted OCR staff in identifying inefficiencies and areas of opportunity to improve OCR's processes. For example, the DCG process identified the issues of understaffing and an inadequate case management system. OCR has already taken major steps to address these issues, including, an increase in staffing and engaging the University's RFP process to identify a new case management vendor.

In addition, the DCG process resulted in a review of OCR's structure. While the conversation around structural improvement is ongoing, OCR has identified and received approval for the addition of an Executive Director of Support, Investigation, and Resolution/Sr. Deputy Title IX Coordinator. This position description has been finalized and the search process will be underway shortly. OCR anticipates other potential structural changes as review of recommendations continues.

OCR will continue to assess the recommendations from these external consulting groups throughout the summer and the next academic year.

Initiative 5: Improve and Expand Prevention, Outreach, and Education Initiatives

OCR's Prevention, Outreach, and Education Department (POE) has and will continue to undertake efforts to improve and grow outreach and education initiatives. POE is currently expanding the branch of POE that provides outreach and training to faculty, staff, and graduate students.

POE has also created and filled a position to work directly with MSU community members who have internships, externships, and field placement that may be at risk or are experiencing harassment or other forms of gender-based harm.