



# IMPLEMENTATION PLAN

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



PREPARED BY

University Implementation Team | Updated June 2025

## TABLE OF CONTENTS

	Page Number
Table of Contents .....	1
Introduction .....	1
Implementation Team.....	1
University Demographics and Population .....	2
<b>Progress to Date</b> .....	2
Plan Summary.....	3
Infrastructure and Resources .....	4
Strengthening Internal Protocols .....	5
Communications .....	7
Prevention, Education, Professional Development, Training, and Awareness .....	8
Responding to Other Conduct of Concern.....	9

## 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 within 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 and February 2023. A report identifying core observations and recommendations for improvements at both the system and university levels was shared system-wide on July 17, 2023.

California State University, San Bernardino ("CSUSB") received its individualized [campus report](#) on July 17, 2023, as well as information from a separate system-wide [audit](#) 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, CSUSB created an Implementation Team to evaluate, assess, and implement the Cozen O'Connor recommendations at CSUSB. [The team launched a website dedicated to cataloging the team's plan and progress.](#)

## IMPLEMENTATION TEAM

To facilitate the implementation of recommendations, CSUSB formed the Implementation Team, which is specified below, 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 CSUSB Implementation Team include:

- |                    |  |                                   |
|--------------------|--|-----------------------------------|
| ● Robin Phillips   | Co-Chair, Vice President                 | Human Resources                   |
| ● Steven Vasquez   | Co-Chair, Title IX Coordinator           | Institutional Equity & Compliance |
| ● Kelly Campbell   | Vice Provost                             | Academic Programs                 |
| ● Jordan Fullam    | Faculty Senate Chair                     | Faculty Senate                    |
| ● Ted Young        | Associate Provost                        | Faculty Affairs and Development   |
| ● Carson Fajardo   | ASI President                            | Assoc. Students Incorporated      |
| ● Bryan Haddock    | Chief of Staff                           | President's Office                |
| ● Claudia Ochoa    | Confidential Campus Advocate             | Counseling & Psych. Services      |
| ● Jennifer Moulton | Director of Psychological Services       | Counseling & Psych Services       |
| ● Lisa Root        | Associate Dean of Students/Director      | Student Conduct                   |
| ● Alisha Beal      | Exec. Director, Employee/Labor Relations | Human Resources                   |

## UNIVERSITY DEMOGRAPHICS AND POPULATION

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

CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO		
Location Information		
Location: San Bernardino, CA (pop. 220,328)	County: San Bernardino County (pop. 2,193,656)	Locale Classification: Midsize City
University Information		
President: Tomás D. Morales Ph. D. (May 2012-present)		
Designations: Hispanic Serving Institution (HSI)		
Enrollment		
Total Number of Students	18,510	
Student Ethnicity		
White	11%	
Hispanic/Latino	69%	
Asian	6%	
Two or More Races	2%	
Race and Ethnicity Unknown	4%	
Black/ African American	5%	
International Student	3%	
Native Hawaiian/Other Pacific Islander	0%	
American Indian/ Alaska Native	0%	
Instructional Faculty		
Total Number of Faculty	1,101	
Tenure-Track	41.2%	
Lecturer	58.8%	
Percent Full-Time	49.18%	
Percent Part-Time	50.82%	
Staff		
Total Number of Staff	957	
Percent Full-Time	98.43%	
Percent Part-Time	1.57%	

## PROGRESS TO DATE

The CSUSB Implementation is committed to successfully implementing the recommendations noted in the campus report. As of June 2025, 18 of the 26 consolidated tasks from Cozen's recommendations have been completed.

## PLAN SUMMARY

The Cozen O'Connor recommendations for CSUSB 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).

The sections are summarized as follows:

- A. Infrastructure and Resources key areas include budget allocation for external resources and campus advocates, evaluating the IEC office location for a trauma-informed environment, reviewing staffing needs across relevant offices, fulfilling training and development for Title IX/DHR employees, procuring a case management system, and establishing a supervisory model for the Title IX/DHR office. These efforts aim to ensure a comprehensive framework for campus well-being.
- B. Strengthening Internal Protocols initiatives include mapping the Title IX/DHR case resolution process, developing intake and case management protocols, strengthening campus collaboration through a multidisciplinary team model, evaluating barriers to reporting, ensuring the Title IX Coordinator / DHR Administrator remains involved in disciplinary processes, and developing a system for collecting post-resolution feedback. These efforts are designed to improve the overall effectiveness and responsiveness of the Title IX/DHR program.
- C. Communications emphasize effective outreach and informing the campus community about implementation progress and Title IX and DHR through various modalities, such as documenting a process for distributing nondiscrimination notices, utilizing the Prevention, Outreach, and Education Manager, updating communications, and forming a committee for communication review.
- D. Prevention, Education, Professional Development, Training, and Awareness outlines actions related to developing evidence-based educational programming, ensuring compliance with VAWA provisions, and fostering a campus culture of inclusivity and respect.
- E. Responding to Other Conduct of Concern provides for processes to establish expectations for "other conduct of concern," building programming, identifying competencies for restorative responses, developing an accessible and easy-to-understand reporting form, triaging concerns, assessing recordkeeping, and developing protocols for reporting on campus culture and climate.

The plan includes considerations for fiscal impact, project leaders, and involved units or individuals. The Implementation Plan acknowledges the need for additional resources across campus departments and proposes a collaborative, system-wide approach to address challenges effectively.

The success of the plan relies on coordinated efforts across various university departments, adequate resources and staff, and the commitment to fostering a safe and inclusive campus environment.

## INFRASTRUCTURE AND RESOURCES

The Implementation Team aims to strengthen our Title IX/DHR program by strategically addressing key recommendations outlined on pages 38-39 of the CSUSB 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 oversight 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: Share existing budget line information with the Chancellor's Office, including historical 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.

- Project Leader: AVP Human Resources/ED Counseling<sup>1</sup>
- Stakeholder Offices: IEC/ Counseling/<sup>2</sup>
- Anticipated Project Completion: Spring, 2025
- Priority Level: High
- Status: Completed

Task 2: Assess physical infrastructure to see if alternate locations should be considered, to develop a trauma-informed space for the office of IEC. The objective is to remove potential reporting barriers and provide a safe, accessible, confidential, and trauma-informed space.

- Project Leader: AVP Human Resources
- Stakeholder Offices: HR
- Anticipated Project Completion: Fall, 2025
- Priority Level: High
- Status: In Progress
- Notes/Solutions: Efforts to secure and develop a consolidated, trauma-informed office space for Institutional Equity and Compliance (IEC) are advancing. Initial site improvements include the successful modification (closure) of two inoperable exchange windows (from previous office occupant's use) within the current IEC space. Installation of soundproofing wall materials is scheduled for June 6, 2025, to enhance confidentiality and create a more welcoming environment. Ongoing collaboration with facilities leadership to identify optimal long-term solutions continues.

---

<sup>1</sup> Associate Vice President of Human Resources (AVP-HR) and Executive Director of Counseling

<sup>2</sup> Student Conduct and Ethical Development (SCED) and Executive Director



Task 3. Review staffing needs in IEC, Student Conduct and Ethical Development (SCED), Survivor Advocacy Services (Counseling), Employee Labor and Relations (ELR), and Faculty Affairs and Development (FAD) to cover additional core functions, placing special emphasis on prevention, education, and training, etc.

- Project Leader: VP-HR/Counseling/FAD/SCED (Respective areas of oversight)
- Stakeholder Offices: HR/SCED/ELR/IEC/FAD/Counseling
- Anticipated Project Completion: Summer, 2025
- Priority Level: High
- Status: Completed

Task 4. Identify additional and ongoing training and professional development needs for Title IX/DHR employees, taking into consideration CO expectations, federal compliance, and stated needs.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025
- Priority Level: High
- Status: Completed

Task 5. Systems Infrastructure: Procure a case management system that will retain and collect consistent case data.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR
- Anticipated Project Completion: Fall, 2024
- Priority Level: High
- Status: Completed

Task 6. To ensure effective oversight and accountability, establish a supervisory model that includes routine supervisory meetings, detailed guidance on effective oversight and accountability, and appropriate review measures. This model should balance implementers' independence with the need to identify and elevate critical issues and concerns about safety and risk.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Summer, 2024 (Completed)
- Priority Level: High
- Status: Completed

## STRENGTHENING INTERNAL PROTOCOLS

The goal of the Implementation Team is to promote accountability and strengthen CSUSB 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.

Task 1: Map Title IX/DHR case resolution process from reporting and intake to investigation and resolution.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025
- Priority Level: Moderate/low
- Status: Completed

Task 2. Develop robust intake, outreach, and case management protocols for supportive measures and resources, including identifying a sustainable model to provide Respondent resources.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025
- Priority Level: Moderate
- Status: Completed

Task 3. Strengthen campus collaboration and information-sharing through a multidisciplinary team (MDT) model.

- Project Leader: AVP-HR
- Stakeholder Offices: IEC/FAD/ SCED/ ELR
- Anticipated Project Completion: Spring 2025
- Priority Level: High
- Status: Completed

Task 4. Continue to identify and 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: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: Initial barriers to reporting Title IX/DHR concerns have been identified. A comprehensive plan to continually assess and address these barriers, including strategies for enhanced accessibility and user-focused communication, is under development for implementation by the end of Fall 2025

Task 5. Ensure the Title IX Coordinator/DHR Administrator remains engaged in any disciplinary processes, including sanctions and appeals, until final.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ ELR/ SCED/ FAD
- Anticipated Project Completion: Spring, 2025
- Priority Level: Moderate
- Status: Completed

Task 6. Develop a process to routinely collect post-resolution feedback from the parties and other impacted individuals.



- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Winter, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: IEC has drafted post-resolution feedback surveys designed to gather insights from parties in a trauma-informed manner. Modalities for survey distribution are currently being identified, with implementation anticipated following the 2024-2025 Academic Year.

## COMMUNICATIONS

The goal of the Implementation Team is to support the campus community's immediate and ongoing needs as they relate 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 CSUSB, as well as the progress of the Implementation Team as the University works to meet the recommendations of the Cozen O'Connor report.

Task 1: Ensure the distribution of a clear and consistent communication plan each semester.

- Project Leader: Title IX Coordinator/POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2025
- Priority Level: Low
- Status: 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: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025
- Priority Level: High
- Status: In Progress
- Notes/Solutions: IEC has launched a targeted marketing and outreach campaign to elevate awareness of Title IX/DHR resources, supportive measures, and resolution options. This includes partnerships with Fraternity & Sorority Life, University Housing, and Student Leadership and Engagement, resulting in interactive workshops (e.g., Title IX Trivia at Spring Fest) and safety-focused events during awareness months. Ongoing social media messaging reinforces these efforts, increasing visibility and understanding of student rights and reporting options under the CSU Nondiscrimination Policy.

Task 3. Improve the IEC website and other public-facing communications.

- Project Leader: POEM

- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: The IEC website has been significantly updated to include: photographs and contact information for Title IX/DHR staff; a clear Notice of Non-Discrimination; a direct link to the Nondiscrimination Policy; an overview of procedural and resolution options with accessible graphics in progress; clear instructions on how to make a report (to Title IX/DHR or University Police Department) and comprehensive information on-and off-campus confidential resources.

Task 4. Develop a standing committee of representative student, faculty, and staff ambassadors to support and facilitate institutional efforts to more effectively communicate with campus constituents.

- Project Leader: Chief of Staff
- Stakeholder Offices: IEC
- Anticipated Project Completion: Winter, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: The University is actively identifying representative students, faculty, and staff to form a standing ambassador committee. This committee will support and facilitate institutional efforts to more effectively communicate Title IX/DHR information with campus constituents, with formation anticipated by Winter 2025.

Task 5. Develop an expanded annual report with meaningful information/data.

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Fall, 2024
- Priority Level: Moderate
- Status: 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 47-49 of the CSUSB Cozen O'Conner report. Collaborating with students, staff, and faculty, this plan seeks to develop an evidence-based educational 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. 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: Title IX Coordinator
- Stakeholder Offices: IEC
- Anticipated Project Completion: Spring, 2024
- Priority Level: High
- Status: Completed

Task 2. Convene a university-wide Prevention and Education Oversight Committee to coordinate and align programming across the university.

- Project Leader: POEM
- Stakeholder Offices: IEC
- Anticipated Project Completion: Winter, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: The POEM is assessing constituency needs (undergraduate/graduate students, staff, administrators, faculty) to inform the composition and charge of a university-wide Prevention and Education Oversight Committee. Committee members are expected to be identified by Winter 2025.

Task 3. Allot sufficient budget lines to ensure consistent, baseline funding for personnel, legally required programming, and technology/learning management systems.

- Project Leader: AVP-HR
- Stakeholder Offices: IEC/HR
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: Completed

## RESPONDING TO OTHER CONDUCT OF CONCERN

The plan put forth by the Implementation Team addresses behavior that may not necessarily fall under the 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 CSUSB Cozen O'Connor report pages 49-50. The initial phase entails creating a set of communal agreements that establishes expectations for how members of the CSUSB community should treat one another. Additionally, the plan includes 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.

Task 1: In conjunction with the Chancellor's Office and CSU's Office of General Counsel, develop a statement of conduct that addresses unprofessional conduct, abusive conduct, microaggressions, acts of intolerance, disruptive behavior, free speech and academic freedom, and professionalism.

- Project Leader: VP-HR
- Stakeholder Offices: IEC/ELR/FAD/SCED
- Anticipated Project Completion: Summer, 2025
- Priority Level: Moderate
- Status: Completed

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

- Project Leader: POEM
- Stakeholder Offices: SCED/IEC/ELR/FAD
- Anticipated Project Completion: Fall, 2025
- Priority Level: Moderate
- Status: In Progress
- Notes/Solutions: Employee Labor and Relations (ELR) has established, started and in the process of delivering all required OCC training for all Management Personnel Plan (MPP) employees. Development of broader programming and in-person engagement opportunities to reinforce CSU values regarding respect, tolerance, and professionalism is ongoing.

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

- Project Leader: ELR Executive Director/Dean of Students/Associate Provost
- Stakeholder Offices: SCED/IEC/ELR/FAD
- Anticipated Project Completion: Spring, 2025
- Priority Level: High
- Status: Completed

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

- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED
- Anticipated Project Completion: Fall, 2024
- Priority Level: High
- Status: Completed

Task 5. Build a triage model/review process to ensure that all reports are assessed by Title IX/DHR and evaluate potential avenues for resolution.

- Fiscal Component: Staff Time
- Project Leader: Title IX Coordinator
- Stakeholder Offices: IEC/ELR/SCED/FAD
- Anticipated Project Completion: Fall, 2024
- Priority Level: Moderate
- Status: Completed

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

- Project Leader: Title IX Coordinator

- Stakeholder Offices: IEC/ELR/SCED/FAD
- Anticipated Project Completion: Fall, 2025
- Priority Level: High
- Status: Completed