
COMPLIANCE & CIVIL RIGHTS

Annual Report for 2019-2020 Academic Year

MAY 2021

Washington State University



To the WSU Community

Holly Ashkannejhad, Director | Title IX Coordinator

Welcome to WSU Compliance and Civil Rights' annual report. The purpose of this report is to provide greater transparency about the activities of Compliance and Civil Rights (CCR), including information about complaints, investigations, outcomes, outreach and compliance activities. We also hope to continue to engage the WSU community in these topics and spark interest and activity related to compliance and investigation. Of particular note, addressing discrimination, harassment, and sex and gender based violence takes a unified effort, and we rely on our community partners to ensure WSU is taking system-wide steps to proactively meet compliance obligations, and to prevent, respond to, and address misconduct.

For more information about CCR, please visit our website at ccr.wsu.edu.

Executive Summary

Compliance & Civil Rights Overview

Compliance and Civil Rights (CCR) is responsible for central compliance support for the WSU system and for providing technical guidance to the university community about equal opportunity, Title IX, Title VII, ADA, Affirmative Action, Clery Act, HIPAA, Uniform Health Care Information Act, and other state and federal civil rights and health sciences laws and regulations. CCR also serves as the central resource for complaints under the WSU Policy Prohibiting Discrimination and Harassment, Executive Policy 15 (EP 15), providing investigations, consultations, informal resolutions, and referrals, as appropriate. For more information about CCR, please visit our website: ccr.wsu.edu.

Meet our Team

Director

Holly Ashkannejhad, J.D.

Director – Compliance & Investigation
Title IX Coordinator

Compliance

Daniel B. Records-Galbraith, J.D.

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ADA Coordinator

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Rachel M. Brooks, Ph.D.
Civil Rights Investigator/Coordinator

Holly Campbell
Civil Rights Investigator/Coordinator

K. Raleigh Hansen
Civil Rights Investigator/Coordinator

Kristopher Alina
Investigative Program Coordinator

Geeta Shrestha
Office Assistant

Campus Partners

The work of building an equitable, diverse, and inclusive institution and addressing discrimination and harassment is system-wide. CCR acknowledges and thanks the contribution of our system partners, including President Schulz, system leadership, Student Affairs, law enforcement and campus security, Human Resource Services, the Office of the Provost, the Athletic Department, local victim advocacy agencies, and the support and leadership for CCR from the Chief Compliance and Risk Officer, Sharyl Kammerzell, and the Vice President of Finance and Administration, Stacy Pearson.

CCR is incredibly grateful for our university partners who continue to support WSU's efforts to combat discrimination and harassment, and to proactively adhere to WSU's compliance requirements .

Reports to CCR

CCR receives reports of conduct implicating the WSU Policy Prohibiting Discrimination and Harassment, Executive Policy 15 (EP 15). Depending on the nature of the report, CCR may engage in facilitating supportive measures and resources for individuals, working with departments to set expectations or provide appropriate training, initiating formal investigations or informal resolutions, consultations, or referrals. With some frequency, CCR receives reports from third parties. In those matters, CCR will send outreach and information about reporting and resource options to complainants. At times, a complainant may choose not to participate in CCR's grievance processes or to provide any additional information to CCR. CCR always considers the complainant's preferences with regards to grievance procedures, although there may be times CCR has to investigate, even where a complainant does not want to participate in process. This is typically where there is a safety concern impacting the WSU community.

The annual report data provided in this document includes information on reports that were initially made to CCR during the 2019-2020 academic year; this report does not include information about investigations that may have been initiated or completed during the 2019-2020 year, where those investigations were triggered by a report from a prior academic year.

CCR observed an increase in reports, receiving 628 reports during the 2019-2020 academic year, as opposed to 566 reports during the 2018-2019 academic year. CCR conducts outreach and/or some level of preliminary investigation on all reports received, but provides deference to the wishes of the complainant, where appropriate. Thus, over the 2018-2019 academic year, CCR provided multiple options to complainants, including:

1. Documenting a concern;
2. Facilitating resources or supportive measures;
3. Requesting a consultation;
4. Requesting an alternative resolution or informal resolution; and/or
5. Requesting a formal investigation.

The reported cases stemmed from all parts of the WSU system, as follows:

Campus	Number of reports to CCR
Pullman	529
Vancouver	30
Spokane/Yakima	32
Tri-Cities	17
Everett/Bremerton	7
Extension	10
Global	2

Note: Some matters implicated more than one campus location.

For all cases received, CCR performed outreach and provided resources and reporting options to the complainant. Based on information provided to CCR, and taking into consideration the wishes of the reporting party, CCR initiated 58 investigations/inquiries into allegations regarding student and/or employee conduct under EP 15 reported to CCR during the 2019-2020 academic year. Two additional matters were referred to an external attorney for a formal investigation due to specific circumstances, and CCR also conducted a non-EP 15 investigation on behalf of the Center for Community Standards. CCR provided 76 consultations and made referrals in 81 matters. In collaboration with numerous campus partners, CCR also facilitated numerous supportive measures for students and employees throughout the year, including connecting students to support and care resources in Student Affairs, facilitating meetings with law enforcement or local victim advocacy agencies, re-arranging work or academic schedules, arranging safer travel or location arrangements or restrictions, temporary removal of supervisory responsibilities, no contact directives, trespasses, interim suspensions, restricting communications between parties, or utilizing intermediaries between parties for ongoing work or academic needs. Finally, CCR facilitated 5 Informal Resolutions, a new process (offered after EP 15 was updated in August 2020) which allows

interested parties to voluntarily adhere to a binding resolution agreement meeting their specific needs¹.

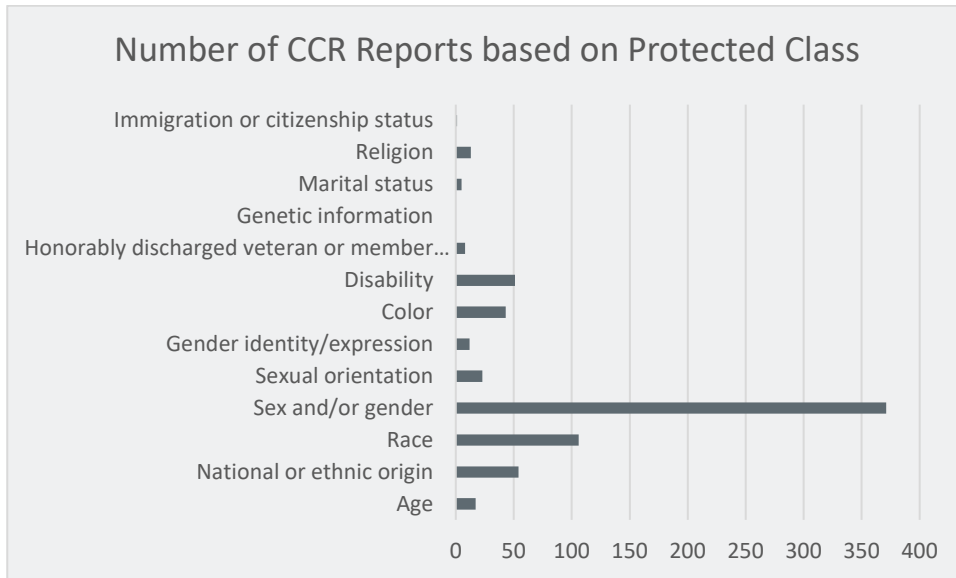
The majority of complaints CCR received were from student complainants; similarly, the majority of complaints were about student respondents. This is consistent with the reporting trends observed in the prior academic year. The below graph includes a breakdown of this information for the 2019-2020 academic year. Please note, “students” can include WSU students, former WSU students (not alums, but those who are recently not enrolled), prospective WSU students, or students from another institution. “Employees” includes faculty, administrative professionals, civil service, bargaining unit, temporary/hourly, and student employees. Finally, CCR also receives reports which do not fit into these categories (e.g. complaints more appropriately directed to other agencies, complaints with anonymous responding parties, complaints involving individuals or organizations not affiliated with WSU, and complaints against individuals affiliated with WSU, such as volunteers).

Report involves:	Number of Reports
Student reporting party	405
Employee reporting party	129
Student responding party	215
Employee responding party	146

Note: Some matters involved multiple reporting parties or responding parties, and/or unknown responding parties.

Consistent with past years, the vast majority of complaints to CCR involve allegations based on sex and/or gender, indicating a continued need for Title IX prevention and response training and education.

¹ Informal Resolutions are not available in matters involving employees subjecting students to Title IX Sexual Harassment.



CCR Investigations

CCR conducted 58 investigations/inquiries from matters reported during the 2019-2020 academic year. CCR also investigated one non-EP 15 matter on behalf of the Center for Community Standards (CCS) and referred two EP 15 matters to an external attorney to investigate (the CCS investigation is not counted in the below statistics, but the external investigations are counted). These investigations looked into alleged conduct from various WSU community members, including:

Primary Respondent Category	Number of investigations
Administrative Professional	10
Bargaining Unit	0
Civil Service	2
Faculty	17
Graduate Student	4
Undergraduate student	24
Volunteer	1
WSU Department	1
External Consultant	1

During 2020, CCR updated our procedural guidelines twice as a result of a system-wide working group's efforts and, later, to be in compliance with new federal regulations. These changes created some additional process rights and options for participants, that in some cases delayed the outcomes. Furthermore,

some investigation timelines were extended as a result of changes impacting the university community by the national pandemic. CCR investigators are working diligently to reduce timelines, and WSU leadership has supported additional resources for CCR.

CCR serves as a neutral investigator. CCR's investigation reports are provided to the complainant and the respondent, as well as the appropriate sanctioning authority for final determinations under university policy. For student respondents, CCR investigation reports are shared with the Center for Community Standards which may engage in conduct officer or conduct board hearings, depending on the severity of the conduct. Additionally, for student matters, students may share their preferred outcome with the Center for Community Standards, which at times will engage in a resolution agreement process to achieve outcomes based on preferences. For employee respondents, CCR investigation reports are provided to the respondent's supervisor for review under employment disciplinary policies. For all matters, participants also retain appeals rights, which can be exercised prior to any final university decision.

Finally, it is important to note that even in matters where CCR did not find a violation of Executive Policy 15, the conduct may still be inappropriate, unprofessional, or in violation of other university policies, such as the Workplace Violence and Bullying Policy or the Standards of Conduct for Students. CCR is not authorized to investigate or make recommended findings under any policy but EP 15. Such matters are referred to the appropriate department or supervisor for further action under those policies.

Investigations/Inquiries related to Sex²

Investigations or inquiries into conduct based on sex and/or gender, including disparate treatment, sexual harassment, sexual assault, intimate partner violence, stalking, or sexual exploitation, are regularly conducted by CCR.

² Some investigations may be based on allegations relating to multiple protected classes. Matters involving multiple protected classes are represented in each relevant section of this report.

Please note, in compliance with new regulations (adhered to in the August 2020 version of EP 15), CCR does not make investigative findings for matters involving conduct considered Title IX Sexual Harassment (see EP 15 for definition); CCR provides recommended findings to the parties, so they can prepare for their Title IX Hearing. For these cases, determinations about responsibility and appropriate sanctions are made by the hearing officers.

The following chart provides the outcomes for cases involving allegations based on sex as they relate to EP 15 in more detail:

Primary Conduct	Primary Respondent Category	CCR Outcome	Final University Outcome and/or Sanction
Discriminatory Harassment	Faculty	No violation	Not responsible
Disparate Treatment	Faculty	Pending Investigation Outcome	Pending Investigation Outcome
Disparate Treatment	Faculty	Pending Investigation Outcome	Pending Investigation Outcome
Disparate Treatment	Faculty	Violation	Pending Disciplinary Outcome
Disparate Treatment	Faculty	No Violation	Not responsible
Disparate Treatment	Faculty	No Violation	Not responsible
Disparate Treatment	Administrative Professional Employee	No Violation	Not responsible
Disparate Treatment	Administrative Professional Employee	Violation	Employment Sanctions
Disparate Treatment	External Consultant	No Violation	Not responsible
Intimate Partner Violence	Undergraduate Student	Violation	Responsible, but Respondent left WSU prior to disciplinary process.
Intimate Partner Violence	Undergraduate Student	Title IX Hearing Required	Pending Disciplinary Outcome
Sexual Assault	Graduate Student	No Violation	Not responsible
Sexual Assault	Faculty	No Violation	Not responsible
Sexual Assault	Undergraduate Student	Violation	Expulsion

Sexual Assault	Undergraduate Student	Violation	Expulsion
Sexual Assault	Undergraduate Student	Violation	Not responsible
Sexual Assault	Undergraduate Student	Violation	Expulsion
Sexual Assault	Undergraduate Student	Violation	Suspension
Sexual Assault	Undergraduate Student	Violation	Suspension
Sexual Assault	Undergraduate Student	Violation	Not responsible
Sexual Assault	Undergraduate Student	Violation	Pending Disciplinary Outcome
Sexual Assault	Undergraduate Student	No Violation	Not responsible
Sexual Assault	Undergraduate Student	No Violation	Not responsible
Sexual Assault	Undergraduate Student	Violation	Expulsion
Sexual Assault	Undergraduate Student	Violation	Pending Disciplinary Outcome
Sexual Assault	Undergraduate Student	Violation	Expulsion
Sexual Assault	Undergraduate Student	Title IX Hearing Required	Not responsible
Sexual Harassment	Faculty	Violation	Employment Sanctions
Sexual Harassment	Faculty	Violation	Employment Sanctions
Sexual Harassment	Faculty	Insufficient info to warrant further investigation	Not responsible
Sexual Harassment	Faculty	Violation	Responsible; Respondent left WSU prior to disciplinary process.
Sexual Harassment	Faculty	No violation	Not responsible
Sexual Harassment	Civil Service Employee	No violation	Not responsible
Sexual Harassment	Civil Service Employee	Violation	Employment Sanctions
Sexual Harassment	Administrative Professional Employee	Violation	Responsible; Respondent left WSU prior to disciplinary process.
Sexual Harassment	Administrative Professional Employee	No Violation	Employment sanctions

Sexual Harassment	Volunteer	No violation	Not responsible
Sexual Harassment	Undergraduate Student	Violation	Educational Sanctions
Sexual Harassment	Undergraduate Student	No violation	Not responsible
Sexual Harassment	Graduate Student	No violation	Not responsible
Sexual harassment	Graduate Student	Title IX	Pending Disciplinary Outcome
Stalking	Graduate Student	Violation	Probation and Educational Sanctions
Stalking	Undergraduate Student	Violation	Probation and Educational Sanctions
Stalking	Undergraduate Student	Violation	Suspension
Stalking	Undergraduate Student	No Violation	Not responsible
Stalking	Undergraduate Student	Violation	Educational Sanctions

Discrimination or Discriminatory Harassment Investigations/Inquiries

Although the majority of complaints to CCR involve sex and/or gender, CCR also conducted investigations or inquiries into conduct alleged to have occurred based on other protected class categories, such as national or ethnic origin, race, color, sexual orientation, status as an honorably discharged veteran or member of the military, or physical, mental, or sensory disability. Please note, some of these matters overlap with the investigations based on sex discrimination listed above, as reporting parties can allege that conduct is occurring on the basis of more than one protected class. These investigations resulted in the following outcomes:

Primary Conduct	Protected Class	Primary Respondent Category	CCR Outcome	Final University Outcome and/or Sanction
Disparate Treatment	Color; Race	WSU Department	Violation	Civil Rights Action Plan
Disparate Treatment	Race; Sex and/or gender; National or ethnic origin	Faculty	Violation	Pending Disciplinary Outcome

Disparate Treatment	Physical, mental or sensory disability	Faculty	Violation	Training
Disparate Treatment	Race; National or ethnic origin	Faculty	No Violation	Not responsible
Disparate Treatment	National or ethnic origin	Faculty	Pending Investigation Outcome	Pending Investigation Outcome
Disparate Treatment	Physical, mental or sensory disability	Faculty	No Violation	Not responsible
Disparate Treatment	Physical, mental or sensory disability	Faculty	No Violation	Not responsible
Disparate Treatment	N/A	Administrative Professional Employee	No Violation	Not responsible
Disparate Treatment	Sexual orientation	Administrative Professional Employee	Pending Investigation Outcome	Pending Investigation Outcome
Disparate Treatment	Status as an honorably discharged veteran or member of the military	Administrative Professional Employee	Pending Investigation Outcome	Pending Investigation Outcome
Disparate Treatment	Race; National or ethnic origin	Administrative Professional Employee	No Violation	Not responsible

2019-2020 Academic Year Accomplishments and Initiatives

In addition to providing consultations, compliance recommendations, and researching civil rights compliance requirements for the campus community on a regular basis, CCR develops a yearly strategic plan with broader initiatives meant to benefit the WSU system. Below are some highlights from the 19-20 academic year.

Policy and Procedure

After a multi-year review of the WSU Policy Prohibiting Discrimination and Harassment, Executive Policy 15 (EP 15), with campus partners and the Campus Climate Initiative EP 15 Working Group, CCR submitted the policy, renamed to

the WSU Policy Prohibiting Discrimination and Harassment, to the Office of Policies, Records, and Forms to circulate amongst system-wide stakeholders, pursuant to WSU's standard policy approval process; EP 15 was published during April 2020. Updates to the policy included examples of discrimination, statements of participants' rights and responsibilities, and inclusion of "immigration or citizenship status" as a class protected from discrimination, pursuant to the recent passage of Washington state's Senate Bill 5165.

After updating EP 15 in April 2020, CCR worked closely with campus partners and the Student Feedback Committee to thoroughly review the newly published Title IX regulations (issued in May 2020 and effective in August 2020) which led to significant changes in the WSU Policy Prohibiting Discrimination and Harassment, Executive Policy 15 (EP 15), CCR Procedural Guidelines, the Standards of Conduct for Students, and employee hearing procedures. Based on feedback from the campus community, CCR implemented supportive measures, investigations, and informal resolution processes equitably – providing the same processes for discrimination and harassment complaints, regardless of protected class status, rather than having a separate process for matters involving Title IX defined sexual harassment.

CCR also partnered with Cougar Health Services, Athletic Medicine, and the WSU Division of the Attorney General's Office to develop policy language, procedures, and training to ensure patient privacy is protected when individuals report discrimination/harassment concerns occurring within a medical service, and to ensure it is easy for patients to request language interpreters or disability accommodations. Patients now have access to a Section 1557 Civil Rights Coordinator to report civil rights discrimination concerns.

Emergency Planning

CCR implemented new office procedures to enable remote intakes, investigations, consultations, and informal resolutions with students, faculty, and staff during the COVID-19 pandemic. CCR continued to encourage reporting and maintained relatively consistent reporting during the pandemic.

Training and Education

CCR developed all new handouts for students and staff, developed new email outreach and investigation templates, and updated websites to be consistent with the changes to the WSU Policy Prohibiting Discrimination and Harassment and the CCR Procedural Guidelines.

CCR chose to increase online on-demand and regularly scheduled in-person (or Zoom) training opportunities and availability for the 19-20 academic year. The following training services were provided, with new offerings in italics:

- Redeveloped and launched the *Employee Discrimination, Sexual Harassment, and Sexual Misconduct Prevention Training*, available on-demand by registering through the HRS Online Learning Account
- Equal Opportunity Issues for Supervisors, regularly offered for in-person and video-conference, available for registration through the HRS Online Learning Account
- Student Discrimination, Sexual Harassment, and Sexual Misconduct Training, provided at request of departments, faculty, or student organizations
- New *Sexual harassment and sexual violence prevention and reporting* option to Athletic Department personnel, as well as new student athletes
- *Title IX – Know Your Rights*, regularly offered in-person and via video-conference
- Undergraduate Student and Student Employee Rights and Responsibilities under WSU’s Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct, offered regularly via video-conference and in-person
- Graduate Student Rights and Responsibilities under WSU’s Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct, offered regularly via video-conference and in-person
- *Faculty Civil Rights Compliance Rights and Responsibilities*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account
- *Classroom Accommodations Training for Faculty*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account

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- *Executive Policy 39 Service Animal Policy Training*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account

CCR regularly updated the above trainings, including when EP 15 was revised in April 2020 and for the Title IX regulatory changes, effective August 2020. In addition to these regularly scheduled trainings, CCR regularly provides trainings at request for classes, student organizations, community forums, and employee organizations, tailored to meet the needs of the requesting organization. For more information on registering for or requesting a CCR training, please visit our website: ccr.wsu.edu/education-training.

CCR also provided training for the Section 1557 Coordinator, and relevant health sciences administrators, relating to responding to complaints of discrimination and harassment and ensuring language or disability accommodations were available to patients at Cougar Health Services and Athletic Medicine. With the new processes designed to protect victim privacy, CCR also obtained HIPAA privacy training for investigators.

Finally, engaged in broader education efforts through reports and compliance guidance. CCR issued its first annual report in April 2020 to support greater transparency of investigative work and to information about CCR initiatives to the WSU community ([CCR 2018-2019 Academic Year Report](#)). CCR issued compliance guidance to department leadership on NIH and NSF reporting requirements for complaints of sexual harassment and misconduct. CCR also issued compliance guidance on the Campus Sex Crimes Prevention act and institutional responsibilities under that law.

Clery Responsibilities

After academic year 18-19's comprehensive review, CCR initiated a number of Clery related projects. CCR partnered with campus law enforcement and security personnel to update the Campus Security Authority (CSA) Training, offering online via the HRS Online Training Account. CCR also developed a CSA website, to provide educational information about CSA responsibilities and to help CSAs quickly and easily report required crime information to the

appropriate crime statistics gathering agency. Finally, CCR has engaged in more proactive outreach to CSAs to ensure they are aware of and trained in their reporting requirements.

CCR is also providing technical guidance and protocols to system-wide Annual Security Report administrators, to ensure reports and practices meet federal laws and regulations. As part of these efforts, CCR developed a new Annual Security Report template, with built-in examples and guidance for system partners. CCR, in partnership with the WSU Police Department and other campus partners, published the WSU Pullman Annual Security Report, available for review here: [Annual Security and Fire Report – Pullman | 2020-21](#).

Title IX Responsibilities

After working on the academic year 18-19 comprehensive review, CCR recommended Title IX Administration responsibilities and appointments to the Office of the President, which formalized the appointments in the Fall 2019 semester. For more information on the division of Title IX responsibilities at WSU, please visit: president.wsu.edu/title-9. CCR provided Title IX Deputy Coordinators with training on Title IX, Interim Measures, Athletics compliance, CCR investigative procedures, survivor trauma, pregnant/parenting student rights, 1st amendment rights, and student conduct proceedings, as appropriate.

CCR also developed and increased Title IX training opportunities to students and staff by creating a stand-alone Title IX focused trainings for the WSU community, developed graduate student specific training which was provided multiple times throughout the 19-20 academic year, provided informational slides for graduate school orientation, participated in the graduate students' Professional Development initiative, and developed a Title IX Regulations training for investigators, informal resolution facilitators, advisors, and hearing personnel. CCR also updated intake packets for both reporting and responding parties, developed informed consent forms for intake consultations (these forms were created at the recommendation of the NASPA Culture of Respect; however, the forms were later discontinued after feedback from complainants who felt they were overly legalistic for an initial consultation), updated the online reporting form, and developed an online Feedback Form and initiated a

Student Feedback Committee, to better ensure CCR's activities are consistent with our community's needs.

After updating EP 15 in April 2020, CCR worked closely with campus partners and the Student Feedback Committee to thoroughly review the newly published Title IX regulations (issued in May 2020 and effective in August 2020) which led to significant changes in the WSU Policy Prohibiting Discrimination and Harassment, Executive Policy 15 (EP 15), CCR Procedural Guidelines, the Student Code of Conduct, and faculty and staff hearing procedures.

ADA/504 Responsibilities/Accessibility

CCR developed and implemented new training offerings on topics including: Service and Support Animals and Classroom Accommodations Guidance for Faculty. CCR also developed online tools and resources related to service animals in-training and departmental requests to review service animal concerns. CCR worked with system-wide partners to ensure each campus had expertise on service animal rights and relevant policies. CCR began working with partners to conduct focused ADA/504 compliance reviews of specified programs. CCR worked with Facilities Services and Transportation Services to develop communications protocols for when accessibility is impacted by events or projects and will continue to provide assistance as these protocols are implemented. CCR continues to connect with stakeholders to develop and provide technical assistance on disability related compliance concerns. For more information on accessibility at WSU, visit: access.wsu.edu.

Affirmative Action/Equal Opportunity

CCR developed comprehensive EEO/AA workforce and recruitment reports for specific areas and distributed them to senior leaders in each area to allow for data-driven planning and recruitment strategies. CCR provided training sessions and individual consultations to accompany the EEO/AA reports. CCR initiated a working group to redevelop an Affirmative Action Plan narrative that is consistent with WSU's values and continuing efforts to improve diversity, equity, and inclusion; in addition, the working group reviewed new OFCCP Technical Guidance to determine if WSU's methodology, statistics sourcing, or plan structure needed to be adjusted (due to the COVID-19 Pandemic, the

working group has been postponed but reconvened in 2021). CCR worked with campus partners to provide technical guidance on affirmative action and related compliance concerns.

2020-2021 Academic Year Goals/Updates

CCR continually identifies proactive projects designed to improve diversity, equity, and compliance efforts at WSU. The below projects were initiated during the 20-21 academic year.

Civil Rights Policy

In response to changes affected by the 2020 Title IX regulations, CCR launched new policies and processes in August 2020. CCR has continued to monitor these changes for impact and greater efficiencies, leading to the development of templates, development of online forms, acquisition of software to better facilitate participants' ability to review collected evidence, and a broad assessment of workflow, which is leading to a shift in CCR's intake practices and workflow, which CCR hopes to implement during the summer 2021.

Health Sciences

During 2020, CCR acquired responsibility for providing technical guidance on HIPAA and other healthcare laws and regulations. In partnership with the Chief Compliance and Risk Officer and the WSU Division of the Office of the Attorney General, CCR assisted with designating WSU as a Hybrid Entity, identifying relevant health care components in a new policy, HIPAA Hybrid Entity Designation Policy, Executive Policy 40. CCR also worked with WADDL on a Risk Assessment, identified a Security Risk Assessment Tool for health care components to utilize on an annual basis, initiated a Health Sciences Committee, initiated a Privacy Officers Working Group, developed a Health Sciences Compliance website, developed significant training materials for employees drafted a patient access to protected health information policy (in review), drafted notice of privacy practice (in review) and is reviewing incident/breach response procedures. CCR also did a comprehensive review of Business Associate Agreements (BAAs), providing guidance to relevant administrators on

when BAAs are required. CCR is also working with system partners to develop process and guidelines for compliance with the 21st Century Cures Act.

Training and Education

Due to the multiple changes published into EP 15 and CCR Procedural Guidelines in April and August 2020, CCR engaged in a communications campaign, sending system-wide emails, partnering with the WSU Insider to share information, and hosting multiple in-person and online trainings and forums to educate students, faculty, and staff about the changes to EP 15.

After observing a need for supervisory training for handling difficult situations, CCR partnered with the College of Arts and Sciences, Human Resource Services, the Office of the Provost, and the Office of the Dean of Students to develop a new “Managing Difficult Situations” training, which focuses on a supervisor’s role in maintaining a civil and equitable academic and work environment.

With the shift to remote education, and nation-wide reports of discriminatory harassment and Zoom-bombing, CCR worked with the Office of the Provost to ensure faculty and staff had information about these dangers and campus resources. CCR also developed a protected speech protocol for faculty and instructors to help manage the classroom space and identify resources, if needed.

With the support of the Chief Compliance and Risk Officer, Sharyl Kammerzell, and the WSU Cabinet, WSU moved to a yearly requirement for employee training on EP 15. CCR worked with Human Resource Services to develop and implement an Annual Refresher Training for employees.

Clery Responsibilities

After prior reviews of system-wide Clery Act compliance activities, CCR developed a Clery Model Project Plan which identified relevant regulatory requirements, identified responsible WSU resources to meet the requirements, and provided a timeline for yearly activities. CCR is currently working with system partners to implement the Clery Model Project Plan, identify sufficient resources, and develop system Annual Security Reports.

Title IX Responsibilities

Due to the new federal Title IX Regulations, CCR updated all procedures, policies, internal guidance and templates, and outward facing communications and training materials to comply with the new regulations. CCR staff have received training on the Title IX regulations and on conducting Informal Resolutions. CCR is closely monitoring the impact of the regulatory changes on students, staff, and investigation timelines, to proactively update and improve processes as more is learned. CCR also participated in state-wide efforts to advocate for improvements to the federal government's Title IX regulations, with a focus on how to make grievance procedures student friendly and empowering for participants. CCR continued to gather feedback, collaborate with, and improve processes for survivors of sexual violence by working with system and community partners, including through coordinated community response teams, Student Feedback Committee, and the WSU Title IX Committee. Finally, CCR provided guidance throughout the year to departments regarding pregnant and parenting students and employees, and developed a form to allow to provide for newly created or updated Lactation spaces to be readily available on CCR's website.

Student Feedback Committee

The Student Feedback Committee (SFC) began its first year during the academic year 19-20. The SFC's feedback informed updates to handouts, and their feedback is currently being used to re-design CCR's website, to be published during the summer of 2021. The SFC also provided feedback on Title IX regulatory changes and their impact on students, procedural changes, and best practices to communicate with students about their rights.

ADA/504 Responsibilities/Accessibility

CCR initiated a system-wide Disability Services Provider group to regularly meet, exchange ideas and information, and problem solve on matters involving student and staff accommodation needs. In partnership with system Disability Services Providers, CCR provided recommendations and guidance for accommodations due to COVID-19. In addition, CCR, in collaboration with the ADA Steering Committee, initiated a review to study the feasibility of a

centralized funding model for disability accommodations for students, employees, and visitors. Finally, CCR received web accessibility training and updated CCR's website to be consistent with industry best practices.

Affirmative Action/Equal Opportunity

CCR re-assessed Affirmative Action plan practices, including assessing how the university's transition to Workday software would impact the development of the Affirmative Action Plan in the future. CCR reconvened the Affirmative Action working group to review plan elements for consistency with WSU's mission and goals as a land grant institution. CCR also provided compliance guidance to system disability service providers with information on determining essential requirements and accommodations.