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PREPARED BY

University Implementation Team | August 2024

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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 to 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 East Bay ("CSU East Bay") received its individualized [Campus report](#) on July 17, 2023, as well as information from a separate systemwide [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, CSU East Bay created an Implementation Team to evaluate, prioritize, and implement the Cozen O'Connor recommendations at CSU East Bay. The team launched a website dedicated to cataloging the team's plan and progress: [Title IX/DHR - Sexual Assault Prevention | CSUEB](#).

IMPLEMENTATION TEAM

To facilitate the implementation of recommendations, CSU East Bay formed the below Implementation Team 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 CSU East Bay Implementation Team include:

Sarah Nielsen, Interim Director of Faculty Development – Co-Chair
Kathleen Wong Lau, University Diversity Officer – Co-Chair

Pamela Baird, Director, Accessibility Services
James Carroll, Executive Director, Associated Students, Inc.
Mike Chang, DHR Administrator/Senior Investigator, Civil Rights*
Heather Gardley, Student Conduct Officer, Other Conduct of Concern Lead for Students
JoLani Hironaka, Director/Acting Title IX Coordinator, Civil Rights*
Silvina Ituarte, Associate Provost, Other Conduct of Concern Lead for Faculty

¹ "*" Indicates staff of the East Bay Civil Rights Team (Title IX/DHR Program).

Kim Greer, Interim Provost
Balvinder Kumar, Assistant Vice President, University Extension
Terri La Beaux, Prevention and Education Coordinator/Acting Deputy Title IX Coordinator*
Jennifer Luna, Director of Recreation, Wellbeing and University Unions
Michelle Luqueno-Diaz, Confidential Advocate
Ellen G. Maloney Ruhe, Intake and Support Coordinator, Civil Rights*
Omar Miakhail, Chief, University Police Department
James Carroll, Executive Director of Associated Students, Inc.
Victoria Morris, AVP Human Resource and Payroll Services
Josh Russell, University Communications
Michelle Webber, Human Resources Manager, Other Conduct of Concern Lead
Yashica Ahvad, Associate Students, Inc., Director of Communities (nomination pending)

UNIVERSITY DEMOGRAPHICS AND POPULATION

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

CALIFORNIA STATE UNIVERSITY, [INSERT NAME]		
Location Information		
Location: Hayward and Concord	County: Alameda	Locale Classification: Hayward
University Information		
President: Cathy Sandeen		
Designations:		
Enrollment		
Total Number of Students	12,269	
Student Ethnicity		
White	1,973	
Hispanic/Latino	4,493	
Asian	2,572	
Two or More Races	596	
Race and Ethnicity Unknown	514	
Black/African American	1,057	
International Student	940	
Native Hawaiian/Other Pacific Islander	105	
American Indian/Alaska Native	19	
Instructional Faculty		
Total Number of Faculty	915	
Tenure-Track	367	
Lecturer	548	
Percent Full-Time	40%	
Percent Part-Time	60%	
Staff		
Total Number of Staff	834 (unconfirmed)	
Percent Full-Time	92%	
Percent Part-Time	8%	

PLAN SUMMARY

The Cozen O'Connor Recommendations for CSU East Bay are reviewed below by 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.

INFRASTRUCTURE AND RESOURCES

A. Infrastructure and Resources: We offer the following recommendations to address infrastructure challenges at the campus level:

Cozen Recommendation A.1. Work with the Chancellor's Office to develop a project plan for addressing gaps and implementing recommendations.

East Bay Response: The East Bay implementation Plan 2024-25 was revised based on feedback from the interim Systemwide Director (SWD) and submitted in June 2025. Status: Submitted.

Cozen Recommendation A.2. Share existing budget line information with the Chancellor's Office, including historic 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 (recognizing that these resources are typically outside of the Title IX/DHR budget).

East Bay Response: Since August 2023, the East Bay Budget Officer provides the program budget to the Chancellor's Office annually. Status: Completed and ongoing.

Cozen Recommendation A.3. Map functions within the Title IX/DHR program to ensure sufficient personnel to cover all core functions, including: intake and outreach, case management, investigations and hearings, informal resolution, sanctions and remedies, prevention and education, training, data entry and analysis, administrative tasks, and additional resources to support legally-compliant, effective Title IX/DHR programs, as well as the essential care side of campus responses.

East Bay Response: The East Bay organization chart for Civil Rights maps each of these core functions, including care resources, to four full-time positions. The Intake and Support Coordinator conducts intake and outreach separate from investigations and performs data entry. The Prevention Education Coordinator/Acting Deputy Title IX Coordinator supervises three student assistants, coordinates prevention education for students, staff, and faculty, and implements and educates campus partners on supportive measures. The DHR Administrator/Senior Investigator conducts investigations and hearings. The Director/Acting Title IX Coordinator supervises all full-time positions, conducts investigations, consults on sanctions and hearings with Faculty

Affairs, Human Resources, and Student Conduct, approves informal resolutions, conducts data analysis, and ensures legally compliant and effective programs in all areas. All staff members discuss case management plans with the team, perform their own administrative tasks in most instances, and attend CARE meetings for their assigned cases. Internal controls for consistency include weekly review of case management plans and target dates, Director approval of all correspondence, biweekly review of all new matters with the Chancellor's Office, Systemwide Director approval of all Notices, and Civil Rights Attorney review of investigation reports. In November 2023, we stopped engaging external investigators on any new matters. Status: Completed and ongoing.

Cozen Recommendation A.3.1. In order for the office to be sufficiently resourced, we recommend that the university supplement Title IX/DHR team with the following necessary personnel and resources: a prevention and education coordinator, a support and intake coordinator, an investigator (the need for which may increase over time or may be subsumed by the CSU Center for Investigations and Resolutions), and a full-time administrative manager. The addition of a support and intake coordinator would allow the office to have increased separation between the care and support function of the office (the support and intake coordinator) and the resolution function of the office (investigators), and would allow for a reallocation of workload to the education coordinator, who would be able to track training requirements and ensure follow through.

East Bay Response: Since April 2025, the East Bay Civil Rights staffing model includes four full-time staff: Intake and Support Coordinator, Prevention Education Coordinator/Acting Deputy Title IX Coordinator, DHR Administrator/Senior Investigator, Director/Acting Deputy Title IX Coordinator, who serves as full-time administrative manager, and three part-time Student Assistants. Since July 2024, the Intake and Support function is fully separate from the investigations function in every case. In December 2024, investigations were reallocated from the Prevention Education Coordinator to support tracking and follow-through. Status: Completed and ongoing.

Cozen Recommendation A.4. Based on benchmarking and recommendations from the Chancellor's Office, identify recurring baseline (or line item) funding (both source and amount) for the Title IX/DHR program.

East Bay Response: In AY 2024-25, the recurring allocation of \$500k annually from the Chancellor's Office, plus campus funding, supports a total budget of \$641,005, including benefits, for the East Bay Title IX/DHR ("Civil Rights") Program. The staff include four full-time positions: Intake and Support Coordinator, Prevention Education Coordinator/Acting Deputy Title IX Coordinator, DHR Administrator/Senior Investigator, and Director/Acting Title IX Coordinator, who supervises the team, and three Student Assistants.

As a direct result of the recurring Chancellor's Office allocation, we were able to add the DHR

Administrator/Senior Investigator position in April 2025, and add two student assistants. These allocations appear sufficient to sustain all four full-time positions and potentially add student assistants in AY 2025-26.

Prior to the recurring allocation, in AY 2023-24, campus funding for the Civil Rights budget was \$536,163 to support three full-time positions and one student assistant. In AY 2022-23, campus funding was \$434,506, supporting two full-time positions.

Status: Completed and ongoing.

Cozen Recommendation A.5. Work with the Chancellor's Office to implement an enterprise-level case management system and develop protocols for consistent collection and retention of data.

East Bay Response: Since February 2024, East Bay uses Maxient as our case management system of record and protocols to document and retain all case management correspondence, notices, and reports. By August 2024, all case documentation for matters received since July 1, 2023 were migrated into Maxient. Status: Completed and ongoing.

Cozen Recommendation A.6. Ensure an adequate supervisory model that includes a routine cadence of supervisory meetings, guidance about how to ensure effective oversight and accountability measures, an appropriate level of detail for review, development, integration and tracking of decision-making frameworks, and balancing implementers' independence and autonomy with the need to identify and elevate critical issues and concerns about safety/risk.

East Bay Response: Since February 2024, East Bay Civil Rights ensures an adequate supervisory model that includes a routine weekly cadence of staff meetings and biweekly 1:1 supervisory meetings to ensure timeliness, oversight, and accountability. Since June 2024, the Director/Acting Title IX Coordinator reviews all correspondence, notices, and investigation reports. East Bay Civil Rights staff meet bi-weekly with the Chancellor's Office Civil Rights Systemwide Director and Campus Counsel to ensure an appropriate level of detail for review, development, integration and tracking of decision-making frameworks, in which the decision-making of implementers is balanced with the need to identify and elevate critical issues and concerns about safety or risk. Since September 2024, the Systemwide Director approves all Notices of Investigation and Notices of Noninvestigation, and the Chancellor's Office Civil Rights Attorney reviews all Investigation Reports. Since 2016, East Bay Civil Rights evaluates and addresses risk and safety issues as reports are received, at weekly staff meetings, at bi-weekly meetings of the Case Management Team (East Bay's Multidisciplinary Team/MDT), Chancellor's Office, and CARE teams. The Director/Acting Title IX Coordinator meets with their supervisor, the East Bay President, monthly. Status: Completed and ongoing.

Cozen Recommendation A.7. Commit to the consistent investment in professional development and continuous learning for Title IX and DHR professionals and senior leaders who oversee the

Title IX/DHR program (CLEs, conferences, system training, etc.).

East Bay Response: East Bay Civil Rights staff receive professional development and continuous learning through memberships and training resources such as Association of Title IX Administrators (ATIXA), Association of Workplace Investigators, Mandatory Continuing Legal Education through the California State Bar, Pregnant Scholar, Clery, Bowditch, Stafford, Equal Employment Opportunity Commission, the annual Chancellor's Office July conference, Investigator Series, monthly systemwide meetings, and East Bay training, such as Difficult Dialogues and Restorative Practices. Staff members also fulfill numerous required and optional trainings in CSU Learn. The director attended the Asian Pacific Islander Waves Program, Asian American Native Hawaiian Pacific Islander Student Success Learning Community, and University of California Center for Civil Engagement and Free Speech. Status: Completed and ongoing.

Cozen Recommendation A.8. Identify a sustainable model to provide respondent support services.

East Bay Response: In 2024, four-part time Respondent Process Advisors were appointed, totalling .55 FTE. They were trained in January 2025 and are ready for assignment, prioritizing student respondents. Our feedback process includes questions regarding the Party's experience of support from the Confidential Advocate or Respondent Process Advisor as applicable.

In 2025-26, we will promote sustainability of this model by recruiting additional Respondent Process Advisors and feedback from the Respondent Process Advisors who are assigned to student respondents. Status: In progress and ongoing.

STRENGTHENING INTERNAL PROTOCOLS

Coordinate with the Regional Director, Systemwide Title IX/Civil Rights Division, and subject matter experts to:

Cozen Recommendation B.1.1. Map the case resolution process from reporting and intake through to investigation and resolution process.

East Bay Response: In January 2024, East Bay Civil Rights mapped the case resolution process from reporting and intake through the investigation and resolution process. In June 2024, a version including Other Conduct of Concern was created. In January 2025, a version with policy-based timelines was created. These process maps are used as slides in presentations and handouts based on audience needs. Status: Completed and ongoing.

Cozen Recommendation B.1.1.1. Compare the current process against standard practices and identify any concerns related to timeliness, conflicts, gaps in communication, or gaps in consistent process.

East Bay Response: Since February 2024, East Bay Civil Rights follows the Chancellor's Office Intake and Assessment Checklist, policy timelines, and our internal protocols as we review matters, determine next steps and target dates at weekly staff meetings, and make adjustments where feasible to ensure timeliness, role separation, avoid conflicts, and ensure a consistent process. In addition, the East Bay Civil Rights Director/Acting Title IX Coordinator, DHR Administrator, and Acting Deputy Title IX Coordinator meet biweekly with the Chancellor's Office Systemwide Director, Civil Rights Attorney, and Campus Counsel for feedback and best practices. The Director/Acting Title IX Coordinator compares our timeliness data on the Annual Survey against timeliness data from prior years and identified significant improvement. Status: Completed and ongoing.

Cozen Recommendation B.1.1.2. Identify, map, and reconcile intersections with faculty/staff grievance and disciplinary processes.

East Bay Response: In March 2025, grievance and discipline intersections were mapped for all faculty and staff units, designating either Faculty Affairs or Human Resources as the unit to address them. Status: Completed and ongoing.

Cozen Recommendation B.1.2. Develop robust intake, outreach, and case management protocols for supportive measures and resources.

East Bay Response: East Bay Civil Rights uses the Chancellor's Office Intake and Assessment Checklist and Annual Survey. Since February 2024, we offer supportive measures in every outreach and intake meeting, and document supportive measures and resources provided in Maxient. Since May 2024, protocols for implementing supportive measures are documented. The rationale for not providing a requested supportive measure is communicated to the requester and documented in the Maxient file. In February 2024, we created internal outreach templates and timelines. By February 2025, we progressively shortened these timelines to intervals of five working days. Status: Completed and ongoing.

Cozen Recommendation B.1.2.1. Develop internal protocols and written tools (e.g., templates and checklists) for intake and outreach, oversight of supportive measures, and decision-making regarding emergency removal or administrative leave.

East Bay Response: East Bay Civil Rights uses the Chancellor's Office Intake and Assessment Checklist and Annual Survey. Since September 2024, Civil Rights uses internal intake procedures and weekly staff meetings to ensure prompt outreach and compliance with policy timeframes for every matter to the maximum extent possible. Since February 2024, template letters in Maxient streamline outreach and document all outreach efforts, explain and offer supportive measures, and document supportive measures, resources, and other information provided. By February 2025, we progressively shortened these timelines to intervals of five working days.

Supportive measures are a priority and evaluated upon receipt of incident reports, as needed with campus partners with a need to know, and at weekly staff meetings, biweekly Case Management Team (East Bay's Multidisciplinary Team/MDT) meetings, biweekly meetings with the Chancellor's Office, and biweekly meetings with CARE. Since February 2024, the rationale for not providing a requested supportive measure is communicated to the requester and documented in Maxient. Since May 2024, protocols for implementing supportive measures are documented to support consistency and timeliness. Since November 2024, when East Bay Civil Rights identifies emergency removal criteria as defined by the applicable collective bargaining agreements, we request a meeting with Faculty Affairs for faculty and Human Resources for staff and make a recommendation, based on the nature of reported conduct, safety factors, repeated conduct, age, and relative power over others. Status: Completed and ongoing.

Cozen Recommendation B.1.2.2. Seek to hold an intake meeting with all individuals who make a report of conduct that would potentially violate the Nondiscrimination Policy.

East Bay Response: Since February 2024, East Bay Civil Rights seeks to hold an intake meeting for every report received, including reports that would potentially violate the Nondiscrimination Policy. The status of outreach is discussed for every open matter at weekly meetings, and next steps are identified and scheduled. Maxient template letters support prompt outreach in writing, explain supportive measures, recap the nature of the concern as described in the incident report, and invite the impacted party to meet. We do two outreach letters, a call or text, and a Notice of Closure letter, assuring them the matter can be reopened at any time, all documented in Maxient. From February 2024 to February 2025, East Bay Civil Rights shortened the intervals of outreach letters from 10 working days to five working days. The Director/Acting Title IX Coordinator reviews every outreach letter at this time. Status: Completed and ongoing.

Cozen Recommendation B.1.2.3. Develop protocols for notifying and coordinating with the confidential advocate at the intake meeting, if possible.

East Bay Response: Since November 2022, the East Bay Civil Rights staff on point for conducting outreach and intake for a specific matter coordinates with the Confidential Advocate to ensure availability for intake meetings, ensuring that the complainant or impacted party may choose to include the Confidential Advocate in any matter that involves one of the specific offenses under Senate Bill 808. Coordination includes copying the Confidential Advocate on outreach letters and obtaining availability when scheduling the intake meeting. Status: Completed and ongoing.

Cozen Recommendation B.1.2.4. Develop or update protocols for information sharing to ensure that the Title IX/DHR Office can fulfill its responsibility of documenting all supportive measures offered, requested, implemented, and if denied, the reasons for the denial.

East Bay Response: The East Bay Case Management Team (CMT), which is our multidisciplinary team (MDT), meets biweekly for confidential information sharing. We also file CARE referrals, ping Student Affairs and Counseling through Maxient, meet biweekly, send confidential emails, and have ad hoc meetings on a need-to-know basis to support information sharing for appropriate supportive measures and to sequence actions to support safety.

Supportive measures are offered in every outreach and confirmation letter, and all supportive measures implemented are documented in Maxient. Any supportive measure that is requested and not provided is explained to the requester and the rationale is documented in Maxient. Status: Completed and ongoing.

Cozen Recommendation B.1.2.5. Create a feedback loop to acknowledge responsible employee reports and confirm receipt of the report and next steps.

East Bay Response: In November 2023, East Bay Civil Rights programmed Maxient to send a confirmation email upon receipt of all incident reports submitted online. For all other reporting methods (phone call, email, walk-in), an outreach letter is prepared promptly, acknowledging receipt. In other words, impacted parties who report receive both an email confirming receipt and an outreach letter offering supportive measures and invitation to meet. Responsible parties who report receive the email confirming receipt, but the outreach letters and communications are directed to the impacted party. Status: Completed and ongoing.

Cozen Recommendation B.1.2.6. Establish standardized protocols for outreach to complainants that involve multiple modalities, systems to document outreach, and a protocol for how and when to make additional outreach in cases with non-responsive complainants, including the potential for outreach through a third-party or a responsible employee.

East Bay Response: East Bay Civil Rights has standard criteria and protocols for outreach to complainants using multiple modalities (email, call/text), for tracking responses, and may include contact through the responsible employee who reported the matter when an impacted party is non-responsive. Since January 2024, East Bay Civil Rights has standardized our outreach protocols, created template letters, and used Maxient to document all outreach efforts. Status: Completed and ongoing.

Cozen Recommendation B.1.3. Develop integrated, written processes for initial assessment designed to evaluate known facts and circumstances, assess and implement supportive measures, facilitate compliance with Title IX and Clery responsibilities, and identify the appropriate institutional response after triaging the available and relevant information; as part of the initial assessment, the Title IX Coordinator/DHR Administrator should:

East Bay Response: East Bay Civil Rights uses the Chancellor's Office Intake and Initial Assessment Checklist, including integrated, written steps for supportive measures, initial

assessment of known facts, and notifications to Clery, California Child Abuse and Neglect Reporting Act (CANRA), and the Chancellor's Office. All Notices are reviewed by the Director/Acting Title IX Coordinator or DHR Administrator and the Systemwide Director. Status: Completed and ongoing.

Cozen Recommendation B.1.3.1. Take steps to respond to any immediate health or safety concerns raised by the report.

East Bay Response: The East Bay Intake and Support Coordinator is trained to identify and escalate immediate health or safety concerns to the Director/Acting Title IX Coordinator for action, immediately prepare an initial outreach letter or call/text if appropriate, notify the Confidential Advocate, recommend supportive measures, preservation of evidence, medical exam, call or text if appropriate, notify the University Police Department, file a CARE report for outreach by Counseling and Student Affairs if appropriate. Our Police Chief determines when to convene the East Bay Threat Assessment Team to evaluate potentially threatening situations and make recommendations to the President. Status: Completed and ongoing.

Cozen Recommendation B.1.3.2. Assess the nature and circumstances of the report to determine whether the reported conduct raises a potential policy violation and the appropriate manner of resolution under the Nondiscrimination Policy.

East Bay Response: Since February 2024, East Bay Civil Rights assesses the nature and circumstances of every report to determine whether the reported conduct raises a potential policy violation and the appropriate manner of resolution under the Nondiscrimination Policy. Status: Completed and ongoing.

Cozen Recommendation B.1.3.3. Assess the nature and circumstances of the report, including whether it provides the names and/or any other information that identifies the complainant, the respondent, any witness and/or any other individual with knowledge of the reported incident.

East Bay Response: East Bay Civil Rights assesses the nature and circumstances of every report, including any information that identifies the impacted party, respondent, any potential witnesses, and any individual with knowledge of the reported incident. East Bay Civil Rights seeks to hold an intake meeting for every report received, in order to fully assess whether the nature and circumstances of the report describe a potential violation of the Nondiscrimination Policy. The results of intake meetings are reviewed and discussed at weekly meetings with the Director/Acting Title IX Coordinator and the DHR Administrator. Status: Completed and ongoing.

Cozen Recommendation B.1.3.4. Provide the complainant with both oral and written information about on- and off campus resources (including confidential resources), supportive measures, the right to contact (or decline to contact) law enforcement or seek a civil protection order, the right to seek medical treatment, the importance of preservation of evidence, the right to be

accompanied at any meeting by an advisor of choice, and an explanation of the procedural options available.

East Bay Response: East Bay Civil Rights provides the complainant with information in writing, and verbally as applicable, about on-campus and off-campus resources, including confidential resources, supportive measures, the right to contact (or decline to contact) law enforcement or seek a civil protection order, the right to seek medical treatment, the importance of preservation of evidence, the right to be accompanied at any meeting by an advisor of choice, and an explanation of the procedural options available. We provide a packet of information called the East Bay Victim's Rights and Options packet, attach it to outreach letters to the complainant where appropriate.

Status: Completed and ongoing.

Cozen Recommendation B.1.3.5. Refer the report to appropriate campus officials to assess the reported conduct and determine the need for a timely warning or other action under the Clery Act.

East Bay Response: Since 2016, the Clery Director and Acting Deputy Title IX Coordinator meet biweekly to ensure timely warnings and other actions to comply with the Clery Act. Every new incident report is assessed for reporting under Clery upon receipt and at weekly staff meetings.

Status: Completed and ongoing.

Cozen Recommendation B.1.3.6. Assess the available information for any pattern of conduct by respondent.

East Bay Response: East Bay Civil Rights assesses for any pattern of conduct by respondents upon receipt, at weekly staff meetings, at Case Management Team (our Multidisciplinary Team/MDT) biweekly meetings, and at CARE biweekly meetings, based on available information. Since August 2024, we identify repeat Respondents as part of a larger effort to assess potential patterns of conduct. Status: Completed and ongoing.

Cozen Recommendation B.1.3.7. Discuss the complainant's expressed preference for manner of resolution and any barriers to proceeding (e.g., confidentiality concerns).

East Bay Response: East Bay Civil Rights strives to identify and document the complainant's expressed preference for manner of resolution, any barriers (safety, confidentiality, privacy, other). Supportive measures, CARE reports, and whether to pursue a university-initiated investigation are discussed at weekly staff meetings and at biweekly Chancellor's Office meetings. 11/2023.

Cozen Recommendation B.1.3.8. Explain the policy prohibiting retaliation and how to report acts of retaliation.

East Bay Response: Since February 2024, non-retaliation and how to report are explained at every

outreach contact, intake meeting, and interview of parties and witnesses. Status: Completed and ongoing.

Cozen Recommendation B.1.3.9. Determine the age of the complainant, and if the complainant is a minor, make the appropriate report of suspected abuse consistent with state law.

East Bay Response: Our intake process includes determining the age of impacted parties and filing a report under the California Child Abuse and Neglect Reporting Act (CANRA) if needed within 24 hours. Status: Completed and ongoing.

Cozen Recommendation B.1.3.10. Evaluate other external reporting requirements under federal or state law or memoranda of understanding.

East Bay Response: Since 2023, East Bay Civil Rights reviews all incident reports received within 0 to 12 business hours. Reports against specific university roles, such as the President, Police Chief, Athletics, and other specified roles, are promptly reported to the Chancellor's Office after decision-maker information is obtained. Status: Completed and ongoing.

Cozen Recommendation B.1.3.11. Develop, and follow, a comprehensive written checklist/form to ensure that all required actions are taken under state and federal law.

East Bay Response: East Bay Civil Rights follows the Chancellor's Office Checklist and identifies steps and due dates at weekly staff meetings. In May 2025, fields were added from the Checklist to our Annual Survey data to make this tracking system comprehensive. Status: Completed and ongoing.

Cozen Recommendation B.1.3.12. Develop checklist of factors to consider in determining whether to move forward without a complainant or whether informal resolution is appropriate and ensure sufficient documentation of the determination.

East Bay Response: The East Bay Civil Rights Director/Acting Title IX Coordinator or DHR Administrator determine whether to pursue informal resolution or a university-initiated investigation without a complainant based on criteria from the Nondiscrimination Policy, including safety risk to community, repeated conduct, and role of the respondent, and documents the rationale in Maxient. Status: Completed and ongoing.

Cozen Recommendation B.1.3.13. Provide a written statement of concern at the conclusion of the initial assessment to ensure that the complainant (and as appropriate, the respondent) have a clear understanding of the nature of the report and the proposed resolution path.

East Bay Response: Since January 2024, East Bay Civil Rights ensures all complainants receive a Notice of Investigation, a Notice of Noninvestigation, or a Notice of Closure with an explanation as

to why if no investigation is undertaken. If necessary, a Party may receive a letter at the conclusion of the initial assessment to ensure the Party has a clear understanding of the nature of the incident report and the proposed resolution path. Status: Completed and ongoing.

Cozen Recommendation B.1.4. Separate support/advocacy functions from investigation to avoid role confusion and ensure clear demarcation between the individuals who provide supportive measures to a complainant, respondent or other individual in need of assistance, and the investigator.

East Bay Response: Since February 2025, the Intake function is kept separate from the investigations function for every case, each performed by separate staff, and explained to the impacted party. Status: Completed and ongoing.

Cozen Recommendation B.1.5. Strengthen campus collaboration and information-sharing through a multidisciplinary team (MDT) model.

East Bay Response: Since 2016, the East Bay Case Management Team has functioned our Multidisciplinary Team (MDT) for addressing specific cases and sharing information confidentially. This was reconfirmed in May 2025 by our Implementation Team Co-Chairs and the Chancellor's Office Systemwide Director.

We have additional multidisciplinary workgroups, including the Prevention Education Workgroup, Other Conduct of Concern Leads Workgroup, and Pregnancy Modifications Workgroup. In June 2024, the Pregnancy Related Modifications workgroup was formed to design workflows under new Title IX regulations effective August 1, 2024. Work was completed, and the workgroup is ad hoc. Status: Completed and ongoing.

Cozen Recommendation B.1.5.1. The Title IX Coordinator/DHR Administrator, in conjunction with the Chancellor's Office, should identify essential university partners to serve on the MDT and set standards for meeting goals and sharing real time information. MDT members may include representatives from Student Affairs/Student Conduct, Faculty/Academic Affairs, Human Resources, University Police Department, Title IX Coordinator, DHR Administrator, Clery Coordinator, and University Counsel.

East Bay Response: Since 2016, the Case Management Team has served as East Bay's Multidisciplinary Team (MDT) of essential university partners that shares real time information at meetings and when needed. In October 2022, the Confidential Advocate, University Police Department Lieutenant, and Student Conduct Officer were added. The Associate Director of Residential Life was added in November 2023, due to the importance of Title IX/DHR issues arising for residents of on-campus housing. The Clery Director and Clery Administrative Support were added in May 2025, to consolidate standing meetings and to identify potential safety concerns or recurring issues. The Chancellor's Office Civil Rights Attorney was invited and asked to present on

confidentiality and privacy in May 2025. The East Bay Civil Rights Director/Acting Title IX Coordinator consults with the Implementation Team Co-chairs on adjustments, in consultation with the Systemwide Director. Status: Completed and ongoing.

Cozen Recommendation B.1.5.2. The MDT should meet regularly and at a minimum, weekly, to review all new reports.

East Bay Response: Since 2016, the East Bay Case Management Team (CMT) is our multidisciplinary team (MDT) of essential university partners that shares real-time information and holds it confidentially at scheduled meetings and when needed. In October 2022, the Confidential Advocate, University Police Department Lieutenant, and Student Conduct Officer were added. In November 2023, the Associate Director of Student Housing was added. Since May 2025, the Director/Acting Title IX Coordinator identifies new members, sets standards for meeting goals, sets ground rules for confidentiality, and reviews membership annually. In May 2025, the Clery Director, Clery Administrative Support, who sits in the University Police Department, and Chancellor's Office Civil Rights Attorney were invited. Status: Completed and ongoing.

Cozen Recommendation B.1.5.3. The MDT should ensure that all known and available information about the parties and the reported incident is shared with TIX/DHR to inform TIX/DHR's initial assessment and any steps it determines to take in response (including information maintained outside of Title IX/DHR's recordkeeping systems and information that may only be known to another unit or individual).

East Bay Response: Since 2016, the East Bay Case Management Team has served as our multidisciplinary team (MDT) and meets biweekly. All new East Bay Civil Rights matters are reviewed weekly at staff meeting, at biweekly meetings of the Case Management Team, East Bay/Chancellor's Office Civil Rights biweekly meetings, and CARE biweekly meetings (which includes Student Affairs, Counseling, Basic Needs, Academic Advising, and Associate Deans, with a focus on meeting mental health needs of students). This structure ensures regular, ongoing contact with campus partners multiple times per week and prompt ad hoc meetings when needed. The same parties may be discussed in multiple meetings to ensure supportive and safety measures are provided rapidly as possible. The biweekly cadence and availability of ad hoc meetings meets the needs of East Bay Civil Rights for information exchange and consultation with key partners throughout the campus community. Status: Completed and ongoing.

Cozen Recommendation B.1.5.4. MDT partners should ensure that Title IX has access to the Maxient records of campus partners in order to appropriately assess for risk, climate and pattern in all reports.

East Bay Response: Since 2016, the East Bay Case Management Team (our multidisciplinary team (MDT) members share information at meetings confidentially in order to appropriately assess risk, climate, and potential patterns in all reports. Since June 2021, members can also share

information securely via Maxient. Status: Completed and ongoing.

Cozen Recommendation B.1.5.5. The Title IX Coordinator/DHR Administrator should follow a protocol for securely sharing parties' university ID numbers or names and basic information about the reported incident in advance of MDT meetings to enable all participants to query their records systems and bring forward any relevant information.

East Bay Response: East Bay Director/Acting Title IX Coordinator, DHR Administrator, and Prevention Education Coordinator/Acting Deputy Title IX Coordinator share information regarding names and basic information securely and confidentially at Case Management Team (East Bay's multidisciplinary team/MDT) meetings and through Maxient. Status: Completed and ongoing.

Cozen Recommendation B.1.5.6. The Title IX Coordinator/DHR Administrator should ensure that the multidisciplinary team is trained to treat information confidentially, with sensitivity, and consistent with state and federal privacy laws.

East Bay Response: The Prevention Education Coordinator/Acting Deputy Title IX Coordinator or Director/Acting Title IX Coordinator reviews the importance of holding information confidentially, with sensitivity, and consistent with privacy laws at the start of every year, when onboarding new members, and as needed. Status: Completed and ongoing.

Cozen Recommendation B.1.5.7. The MDT should engage in consultation to inform decisions, including those about emergency removal, administrative leave, the reasonable availability of supportive measures, and questions about the scope of the university's education program or activity.

East Bay Response: Since 2016, East Bay Case Management Team (our multidisciplinary team/MDT) continues to consult and engage partners with information to inform decisions about reasonably available supportive measures, protective orders, and the scope of programs/activities. Issues such as emergency removal, temporary suspension, or administrative leave are addressed directly with the decision maker in Faculty Affairs, Human Resources, or Student Conduct, after East Bay Civil Rights determines the factors are present. Status: Completed and ongoing.

Cozen Recommendation B.1.5.8. The MDT meetings should serve as natural opportunities for documenting the factors considered in reaching key decisions and documenting what information was known, when it was known, by whom it was known, and what impact it had on the Title IX Coordinator/DHR Administrator's analysis.

East Bay Response: Since 2016, East Bay Case Management Team (our Multidisciplinary Team/MDT) meetings provide regular opportunities for documenting factors considered in key decisions, what information was known, when, by whom, and its impact on analyses made by the Director/Acting Title IX Coordinator or DHR Administrator. Case Management Team members

provide information to support decision-making, timing, and sequencing of East Bay Civil Rights actions to support the safety of Parties. Status: Completed and ongoing.

Cozen Recommendation B.1.5.9. The MDT should facilitate the development of shared fluency and knowledge among key university partners related to the legal and regulatory requirements, policy frameworks, and considerations related to care and informed and equitable processes.

East Bay Response: East Bay Case Management Team (our multidisciplinary team/MDT) meetings continue to facilitate shared fluency and knowledge of Title IX/DHR legal/regulatory requirements, the CSU Nondiscrimination Policy, Time Place and Manner Policy, standards of conduct, and considerations related to care and informed, equitable processes. Status: Completed and ongoing.

Cozen Recommendation B.1.6. Develop tools for consistent, informed, effective documentation and case management.

East Bay Response: East Bay tools for consistent, informed, effective documentation and case management include the Chancellor's Office Checklist; Annual Survey; weekly Civil Rights staff meetings to identify and schedule next steps; Maxient to preserve all case management documentation; biweekly meetings with Chancellor's Office; and Director/Acting Title IX Coordinator and Chancellor's Office review of all Notices by the Systemwide Director and Investigation Reports by the Civil Rights Attorney. East Bay tracks repeat Respondents as part of a larger effort to assess potential patterns of conduct. Status: Completed and ongoing.

Cozen Recommendation B.1.6.1. For quality control, develop a case opening and closing checklist to ensure that all relevant documents, correspondence, and information are captured and preserved electronically.

East Bay Response: For quality control, East Bay uses the Chancellor's Office Checklist for case opening and the Annual Survey and Maxient for case closing to ensure all relevant documents, correspondence, and information are captured and preserved electronically. Status: Completed and ongoing.

Cozen Recommendation B.1.6.2. To the extent feasible, seek to maintain data in a usable and searchable electronic format for efficient decision making, analysis and review.

East Bay Response: East Bay maintains data in usable, searchable electronic formats for efficient decision making, analysis, and review. This includes Maxient and our tool to track case data for the Chancellor's Office Annual Survey since February 2024, and using Maxient to document all case management activity since June 2024. Status: Completed and ongoing.

Cozen Recommendation B.1.6.3. Migrate all historical DHR reports and Title IX reports into the enterprise-level case management system, if not already included.

East Bay Response: East Bay migrated all case management records for matters received since July 1, 2023 into Maxient, pending an enterprise-wide case management system. Status: Completed and ongoing.

Cozen Recommendation B.1.6.4. Develop periodic reviews for quality assurance.

East Bay Response: Since January 2024, East Bay Director/Acting Title IX Coordinator conducts weekly reviews of new matters and case management data for quality assurance, including timeliness, clarity, and thoroughness, and all Notices, Letters, and Reports at this time. The Systemwide Director reviews all Notices, and the Civil Rights Attorney reviews all investigation reports. Status: Completed and ongoing.

Cozen Recommendation B.1.7. Oversee investigations for quality and consistency of prompt and equitable processes.

East Bay Response: East Bay Civil Rights Director/Acting Title IX Coordinator oversees investigations for quality and consistency of prompt and equitable processes. Director/Acting Title IX Coordinator and DHR Administrator review investigation reports, and obtain feedback and approval for all Notices of Investigation from the Systemwide Director, and for all Investigation Reports from the Civil Rights Attorney. East Bay maintains staff meeting notes to monitor all investigation-related due dates based on Nondiscrimination Policy timeframes. Status: Completed and ongoing.

Cozen Recommendation B.1.7.1. Establish a protocol to ensure the timeliness of investigations, with routine quality control mechanisms throughout investigation process.

East Bay Response: East Bay Civil Rights has an established protocol to support the timeliness of investigations, which includes weekly staff meeting notes to monitor all investigation-related due dates and adjust assignments where possible to minimize extensions under the Nondiscrimination Policy wherever feasible. Status: Completed.

Cozen Recommendation B.1.7.2. Develop quality control processes for monitoring active investigations for thoroughness and timeliness and ensure timely communications to parties throughout the investigative process (e.g., calendar internal 30-day, 60-day and 90-day alerts to prompt the investigator or case manager to make outreach to the parties).

East Bay Response: East Bay Civil Rights has quality control processes to monitor active investigations for thoroughness and timeliness and to ensure timely communications to parties throughout the investigation. Director/Acting Title IX Coordinator and DHR Administrator review investigation reports, and obtain approval for all Notices of Investigation from the Systemwide Director and for all Investigation Reports from the Civil Rights Attorney. We use staff meeting

notes to monitor all investigation-related due dates based on timeframes and criteria stated in the Nondiscrimination Policy. Director/Acting Title IX Coordinator makes adjustments in assigning new matters to minimize extensions under the Nondiscrimination Policy wherever feasible and reviews cycle times for completed investigations in conjunction with the Annual Survey. Parties in active investigations receive status updates for the investigation every 30 working days throughout the investigative process. Status: Completed.

Cozen Recommendation B.1.7.3. Ensure each report has sufficient review by the Title IX Coordinator/DHR Administrator and University Counsel (for legal review of sufficiency and adherence to policy).

East Bay Response: East Bay Director/Acting Title IX Coordinator and DHR Administrator review investigation reports, and obtain feedback on sufficiency and adherence to policy for all Investigation Reports from the Civil Rights Attorney. Status: Completed and ongoing.

Cozen Recommendation B.2. Continue to evaluate barriers to reporting and engagement at the university level, with aggregation of data and advice and guidance by the Chancellor's Office.

East Bay Response: East Bay Civil Rights continues to evaluate barriers to reporting and engagement through engagement activities with students, faculty, and staff, Difficult Dialogues forums, and Restorative Practices trainings. East Bay Civil Rights engages student leaders and health educators for feedback on barriers to reporting and engagement throughout each academic year. East Bay aggregates case data for the Annual Survey, including protected class information, comparing our volumes with other CSU campuses based on size and demographics. Status: Completed and ongoing.

Cozen Recommendation B.3. Review and revise tone, content, and format of reporting forms and other template communications.

East Bay Response: In January 2024, East Bay Civil Rights reviewed and revised the tone, content, and format of our incident reporting forms and outreach letters to be trauma-informed, avoid jargon, and explain supportive measures first. Caveats for anonymous reports are included. Pregnancy Modification template letters were revised in January 2025 to provide context for types of modifications. A template cover memo for Review of Evidence was created April 2025. Status: Completed and ongoing.

Cozen Recommendation B.4. Review the current post-Title IX/DHR disciplinary processes for faculty and staff to ensure promptness, equity, and informed communication.

East Bay Response: In March 2025, East Bay Civil Rights reviewed the current post-Title IX/DHR disciplinary processes for faculty and staff under the applicable collective bargaining agreements to ensure promptness by understanding the timelines, equity in terms of roles and power

differential between parties, and informed communication regarding the various processes a respondent may choose based on their bargaining unit and the importance of timely investigations. Status: Completed and ongoing.

Cozen Recommendation B.4.1. Ensure the Title IX Coordinator/DHR Administrator remains engaged in any disciplinary processes, including sanctions and appeals, until final.

East Bay Response: East Bay Civil Rights Director/Acting Title IX Coordinator remains engaged in disciplinary processes for all substantiated investigations, including sanctions, appeals, grievances, or arbitration, through regular check-ins with the decision maker and campus counsel until implementation is completed. Status: Completed and ongoing.

Cozen Recommendation B.4.2. Ensure that decisions about negotiated settlements are supported by a careful and coordinated review by all relevant campus and system level administrators.

East Bay Response: East Bay Civil Rights Director/Acting Title IX Coordinator and DHR Administrator meet biweekly with Chancellor's Office Systemwide Director, Civil Rights Attorney, and Campus Counsel. We have agreement to be looped in on any negotiated settlements by the Office of General Counsel. Status: Completed and ongoing.

Cozen Recommendation B.5. Develop and implement a process to routinely collect post-resolution feedback from the parties and all impacted individuals.

East Bay Response: In October 2024, East Bay Civil Rights created a process for routine feedback from parties. We encountered technical issues associated with multiple log-ins by users. In May 2025, with help from an Implementation Team member, we identified a custom setting to allow users previously blocked to access the feedback form. Status: Completed and ongoing.

COMMUNICATIONS

C. Communications: We offer the following recommendations to improve awareness of the Title IX/DHR Office, strengthen campus communications, and address the trust gap:

Cozen Recommendation C.Ensure distribution of a clear and consistent communication plan each semester that includes, at a minimum:

Cozen Recommendation C.1.1. Dissemination of the Notice of Nondiscrimination.

East Bay Response: The East Bay Civil Rights Acting Deputy Title IX Coordinator updates the Notice of Nondiscrimination on our website annually and disseminates it to faculty, staff, and students via Massmail each semester. Status: Completed and ongoing.

Cozen Recommendation C.1.2. Dissemination of the Nondiscrimination Policy.

East Bay Response: East Bay Civil Rights has a link on our website to the most current CSU Nondiscrimination Policy and disseminates the link to faculty, staff, and students via Massmail each semester. Status: Completed and ongoing.

Cozen Recommendation C.1.3. Information about reporting and resources.

East Bay Response: East Bay Civil Rights website features "Reporting and Options," which includes the Incident Reporting Form as the very first link, and information on Rights and Options. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. A QR code to the reporting form has been distributed throughout campus via 2500 stickers in October 2023 and May 2025. Massmails from our Acting Deputy Title IX Coordinator, with office location, contact information, Notice of Nondiscrimination, and link to the CSU Nondiscrimination Policy are sent campus-wide every semester. Victim Rights and Options information is attached to all outreach letters based on the information received and also distributed by the East Bay Confidential Advocate. In 2024-25 alone, East Bay Civil Rights conducted over 200 in-person trainings and numerous activities throughout each semester and reached 4000+ students, staff, and faculty, reinforcing reporting methods, supportive resources, and options for resolution. Status: Completed and ongoing.

Cozen Recommendation C.2. Develop an intentional marketing campaign to raise awareness about the role of the Title IX/DHR program, available resources, and resolution options.

East Bay Response: East Bay Civil Rights collaborated with University Communications to streamline our website and highlight our Culture of Care, using a tile format, inclusive photos, updated links, and simplified, warmer language (e.g., "We CARE"). The website features "Reporting and Options," with the Incident Reporting Form prominent as the first link, followed by Rights and Options information. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. In January 2023, East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." A link to Clery was added, and the Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the reporting form has been distributed throughout campus via 2500 stickers in October 2023 and May 2025. Massmails from our Acting Deputy Title IX Coordinator, with office location, contact information, Notice of Nondiscrimination, and link to the CSU Nondiscrimination Policy, are sent campus-wide every semester. All outreach letters, based on the information received, include information about supportive measures, victim rights, and options information. The resources are also distributed by the East Bay Confidential Advocate. In AY 2024- 25, East Bay Civil Rights offered over 200 in-person trainings and activities, reaching 4000+ students, staff, and faculty and reinforcing reporting options and supportive resources. Status: Completed and ongoing.

Cozen Recommendation C.2.1. Prioritize the messages of care, supportive measures, and

resources.

East Bay Response: East Bay Civil Rights collaborated with University Communications to streamline our website and highlight our Culture of Care, using a tile format, inclusive photos, updated links, and simplified, warmer language (e.g., "We CARE"). The website features "Reporting and Options," with the Incident Reporting Form prominent as the first link, followed by Rights and Options information. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. In January 2023, East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." A link to Clery was added, and the Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the reporting form has been distributed throughout campus via 2500 stickers in October 2023 and May 2025. Massmails from our Acting Deputy Title IX Coordinator, with office location, contact information, Notice of Nondiscrimination, and link to the CSU Nondiscrimination Policy, are sent campus-wide every semester. All outreach letters, based on the information received, include information about supportive measures, victim rights, and options information. The resources are also distributed by the East Bay Confidential Advocate. In AY 2024- 25, East Bay Civil Rights offered over 200 in-person trainings and activities, reaching 4000+ students, staff, and faculty and reinforcing reporting options and supportive resources. Status: Completed and ongoing.

Cozen Recommendation C.2.2. Differentiate and educate about the difference between confidential resources and reporting options.

East Bay Response: A full-time Confidential Advocate position was filled and appropriately situated with other confidential services such as Counseling in the Student Health Center. The separate, confidential role of the Confidential Advocate is offered and explained in every outreach and intake meeting with a complainant to ensure a clear understanding of the differences between confidential resources and reporting options. Status: Completed and ongoing.

Cozen Recommendation C.2.3. Partner with campus communications professionals to create and promote effective marketing materials, including through the use of professional branding that can be used across platforms (print, web, social media, imprinted on giveaway products).

East Bay Response: East Bay Civil Rights collaborated with Communications to revise our website to highlight our Culture of Care, including a tile format, inclusive photos, updated links, simplified and warmer vocabulary (e.g. "We CARE") and central placement of the reporting form. East Bay Civil Rights also designed a new logo, "East Bay – Everyone Belongs," in January 2023. In August 2024, we also embraced the campuswide rebranding campaign across platforms: print, web, social media, email, and signage. Status: Completed and ongoing.

Cozen Recommendation C.3. Improve the Title IX/DHR website and other external-facing communications.

East Bay Response: East Bay Civil Rights collaborated with University Communications to streamline our website and highlight our Culture of Care, using a tile format, inclusive photos, updated links, and simplified, warmer language (e.g., "We CARE"). The website features "Reporting and Options," with the Incident Reporting Form prominent as the first link, followed by Rights and Options information. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. In January 2023, East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." A link to Clery was added, and the Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the reporting form has been distributed throughout campus via 2500 stickers in October 2023 and May 2025. Massmails from our Acting Deputy Title IX Coordinator, with office location, contact information, Notice of Nondiscrimination, and link to the CSU Nondiscrimination Policy, are sent campus-wide every semester. All outreach letters, based on the information received, include information about supportive measures, victim rights, and options information. The resources are also distributed by the East Bay Confidential Advocate. In AY 2024- 25, East Bay Civil Rights offered over 200 in-person trainings and activities, reaching 4000+ students, staff, and faculty and reinforcing reporting options and supportive resources. East Bay Civil Rights also partnered with Associated Students Inc. (ASI) on an anti-bullying video ("Hey, Be Nice!"), distributed via social media in October 2024. Status: Completed and ongoing.

Cozen Recommendation C.3.1. Review and revise web content, across all relevant webpages, for clarity, accuracy, and accessibility.

East Bay Response: East Bay Civil Rights collaborated with University Communications to streamline our website and highlight our Culture of Care, using a tile format, inclusive photos, updated links, and simplified, warmer language (e.g., "We CARE"). The website features "Reporting and Options," with the Incident Reporting Form prominent as the first link, followed by Rights and Options information. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. In January 2023, East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." A link to Clery was added and the Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the reporting form has been distributed throughout campus via 2500 stickers in October 2023 and May 2025. Massmails from our Acting Deputy Title IX Coordinator, with office location, contact information, Notice of Nondiscrimination, and link to the CSU Nondiscrimination Policy, are sent campus-wide every semester. All outreach letters, based on the information received, include information about supportive measures and victim rights and options information. The resources are also distributed by the East Bay Confidential Advocate. In AY 2024- 25, East Bay Civil Rights offered over 200 in-person trainings and activities, reaching 4000+ students, staff, and faculty and reinforcing reporting options and supportive resources. East Bay Civil Rights also partnered with Associated Students Inc. (ASI) on an anti-bullying video ("Hey, Be Nice!"), distributed via social media in October 2024. In the past, links to related federal websites would be broken and then repaired with successive changes in administration, so East Bay Civil Rights revised the links to more enduring informational documents in April 2025. Status: Completed and ongoing.

Cozen Recommendation C.3.2. Ensure that web content includes: photographs and contact information for Title IX/DHR staff, notice of nondiscrimination, a link to the Nondiscrimination Policy, an overview of procedural and resolution options (with accessible graphics), how to make a report (to Title IX/DHR or University Police Department), on and off campus confidential resources, the difference between confidentiality and privacy, supportive measures, employee reporting responsibilities, an FAQ, prevention and education programming.

East Bay Response: East Bay Civil Rights voted to not include individual staff photos out of concern for personal safety and will revisit this decision in June 2025. A "Contact Us" footer was created and is now displayed at the bottom of every page within our website. Web content includes Notice of Nondiscrimination, a link to the CSU Nondiscrimination Policy, and an overview of procedural and resolution options. The reporting form is prominently displayed at the top of our home page. Reporting options to Title IX/DHR, UPD, external resources, and confidential resources (on-campus and off-campus options), and non-reporting options are included on the Reporting and Options page. Resources for Faculty has employee resources and mandated reporting information. Our left side navigation includes Education and FAQs, which link to frequently asked questions, myths and facts, definitions, and "What You Can Do" with Title IX/DHR scenarios. Status: Completed and ongoing.

Cozen Recommendation C.3.3. Continue to update the Title IX/DHR website as follows:

Cozen Recommendation C.3.3.1. Under Title IX/DHR, the CSU Policy tab under does not link to the actual policy. In this tab are the Non-Discrimination Notice on the basis of sex, and two more links. One, "Read More about Title IX" – goes to the U.S. Department of Education website, and the other, "Violence Against Women Reauthorization Act/Campus SaVE Act" – links to a White House statement from March 2022.

East Bay Response: These links were corrected multiple times in 2023 and 2024. The root cause was discovered to be changes in federal administrations. In April 2025, East Bay Civil Rights provided links to more stable resources. Status: Completed.

Cozen Recommendation C.3.3.2. In the Policies and Procedures tab, under Legislation, Regulations, and Policies, the Violence Against Women Reauthorization Act/Campus SaVE Act, links to a White House statement from March 2022, and the Title IX of the Education Amendments of 1972 link goes to the U.S. Department of Education website.

East Bay Response: These links were corrected multiple times in 2023 and 2024. The root cause was discovered to be changes in federal administrations. In April 2025, East Bay Civil Rights provided links to more stable resources. Status: Completed.

Cozen Recommendation C.3.3.3. Under the Procedures tab: Student Complaint Procedure, references the old policy (CSU Executive Order 1097).

East Bay Response: This issue is on the Student Affairs website and was corrected in May 2025. Status: Completed.

Cozen Recommendation C.3.3.4. Under the Procedures tab in Title IX: Employee, Student Employee, and Third Party Complaint Procedure references the old policy (EO 1096), as does the Employee Complaint Procedure tab in the DHR website.

East Bay Response: This was corrected as part of a East Bay Civil Rights website overhaul. Status: Completed.

Cozen Recommendation C.3.3.5. The online Report Form: states, "Students can contact the campus Confidential Advocate, who will keep their disclosures confidential. The Confidential Advocate can explain the complaint process, as well as your different reporting options."

East Bay Response: East Bay Civil Rights includes this information on the Incident Reporting Form to ensure complainants have the information and can choose this option prior to submitting a report. The Confidential Advocate role is completely separate from the East Bay Civil Rights staff. In June 2025, the Incident Report Form was revised to state: *"Students and staff can contact the campus Confidential Advocate (Advocate@csueastbay.edu, 510-885-3700), who will keep their disclosures confidential. If you contact only the Confidential Advocate, the Confidential Advocate will not disclose information about your complaint with the Civil Rights Office. The Confidential Advocate will explain the complaint process, as well as your different reporting options."* Status: Completed.

Cozen Recommendation C.3.3.6. Under Student Complaint Procedure, scrolling down, there is a link to Student Complaint Timeline, this is a pdf document that is outdated.

East Bay Response: This was corrected in September 2022. Status: Completed.

Cozen Recommendation C.3.3.7. Student Affairs link to the CSU Executive Orders, actually goes to the Title IX website.

East Bay Response: This was corrected in April 2024 by removing the link. Status: Completed.

Cozen Recommendation C.3.3.8. University Police Department: Does not have any information about how to make a report or any information about Title IX.

East Bay Response: East Bay Response: This was corrected in March 2025. Under Safety Resources, the first resource is the East Bay Office of Civil Rights, with a link to the Civil Rights Incident Report Form, a link to How to Report, our phone number, and email address. Status: Completed.

Cozen Recommendation C.3.4. Gather, evaluate, and update all existing informational materials, web resources, posters/flyers, social media information, and other public-facing communications about the Title IX/DHR program to ensure that those materials:

Cozen Recommendation C.3.4.1. Reflect the current staffing and structure of the office, the current CSU Nondiscrimination Policy and resolution processes, and current information about on- and off-campus resources including confidential resources.

East Bay Response: The website reflects current East Bay Civil Rights staff and roles; current CSU Nondiscrimination Policy and resolution processes; and current information about on-campus and off-campus resources, including confidential resources. This content is reviewed annually and updated as the information changes. Status: Completed and ongoing.

Cozen Recommendation C.3.4.2. Are written in clear language, accessible (from both a disability perspective and a reading comprehension perspective), and consider strategic placement of newly developed print materials in areas frequented by students, staff, and faculty.

East Bay Response: The East Bay Civil Rights website features materials that are ATI ("Accessible Technology Initiative") compliant, including the Incident Reporting Form. The "Reporting and Options" page includes the Incident Reporting Form as the first link and information on Rights and Options. The East Bay Civil Rights Director/Acting Title IX Coordinator reviews all new public-facing materials for clarity, brevity, and accessibility. Website materials are reviewed and updated annually and as needed. A QR code to the reporting form has been distributed throughout campus where students, faculty, and staff frequent via 2500 stickers in October 2023 and May 2025. Status: Completed and ongoing.

Cozen Recommendation C.3.5. Use standardized email addresses and/or materials that are able to be University Police Departmented quickly (e.g., use of QR codes that point to dynamic webpages that can be updated; using, for example, "TitleIX@[name of university].edu," so that print materials do not become outdated if there is a personnel change, etc.).

East Bay Response: The East Bay Civil Rights website features a "Reporting and Options" page, which includes the Incident Reporting Form as the first link and information on Rights and Options. The East Bay Civil Rights Director/Acting Title IX Coordinator reviews all new public-facing materials for clarity, brevity, and accessibility. Website materials are reviewed and updated annually and as needed. A QR code to the reporting form has been distributed throughout campus where students, faculty, and staff frequent via 2500 stickers in October 2023 and May 2025. Status: Completed and ongoing.

Cozen Recommendation C.4. Develop an expanded annual report with meaningful information/data.

East Bay Response: Beginning in 2015, East Bay Civil Rights shares data on incident reports. We report Annual Survey data for our campus as defined by the Chancellor's Office (CO) and published on the CO website by campus. We also designed a data tracking system we maintain throughout the year to make annual reporting more efficient. Status: Completed and ongoing.

Cozen Recommendation C.5. Develop standing committee of representative student, faculty and staff ambassadors to support and facilitate institutional efforts to more effectively communicate with campus constituents.

East Bay Response: Our Implementation Team appointed by the President includes representative student, faculty, and staff ambassadors who support and facilitate East Bay's institutional efforts to communicate with campus constituents more effectively. East Bay formed a Prevention Education Workgroup comprised of representative student, faculty, and staff ambassadors to focus on creative forms of prevention education with students, staff, and faculty. These creative forms include scenarios, games, activities, and crafts with learning objectives and opportunities for sharing and listening to others. Status: Completed and ongoing.

Cozen Recommendation C.6. Identify and prioritize opportunities for in-person engagement with Title IX/DHR staff (e.g., pop-up events, tabling at an information fair, open houses in various central locations, routine scheduled short presentations to key audiences, and/or sponsored or co-sponsored events).

East Bay Response: In AY 2024-25, East Bay Civil Rights and campus partners presented over 200 in-person trainings and activities reaching 4000+ students, staff, and faculty, reinforcing reporting mechanisms, supportive resources, and options for resolution. We conducted regular tabling and activities for students where they frequent, including for the Pioneer Wellness Challenge, Domestic Violence Awareness Month, Healthy Relationships, Sexual Assault Awareness Month, and Denim Day, Sex in the Dark, Affirmative Consent for general studies classes, and the Clothesline Project. 2500 stickers with a QR code to the incident reporting form have been distributed throughout campus where students, staff, and faculty frequent in October 2023 and May 2025. East Bay Civil Rights also hosts regular open houses to publicize our office location and welcome students, staff, and faculty. Status: Completed and ongoing.

PREVENTION, EDUCATION, PROFESSIONAL DEVELOPMENT, TRAINING AND AWARENESS

D. Prevention, Education, Professional Development, Training and Awareness: We offer the following recommendations to promote legal compliance with the VAWA provisions of the Clery Act and consistent attention to prevention and education programming, training, professional development and awareness:

Cozen Recommendation D.1. Allot sufficient budget lines to ensure consistent, baseline funding for personnel, legally-required programming, and technology/learning management systems.

East Bay Response: East Bay Civil Rights has sufficient, consistent baseline funding for personnel, legally required programming, and technology/learning management systems. Our personnel include four full-time staff: Intake and Support Coordinator, Prevention Education Coordinator, DHR Administrator/Senior Investigator, and Director/Acting Title IX Coordinator, and three Student Assistants. With these personnel, we deliver all legally required programming. In addition, East Bay uses CSU Learn as our learning management system for online training, which is administered by a campus partner in Human Resources. The budget for AY 2024-25 and projected budget for AY 2025-26 were confirmed to be sufficient in consultation with the campus AVP for Budget. Status: Completed.

Cozen Recommendation D.2. Proactively coordinate with system-level subject matter experts to assist with education, training, materials and communications related to complex and difficult issues facing all CSU institutions.

East Bay Response: In AY 2024-25, East Bay Civil Rights coordinates proactively with national and system-level subject matter experts on education, training, communications, and materials related to complex and difficult issues facing all CSU institutions. This includes learning activities, resources, and giveaways for Domestic Violence Awareness Month, Healthy Relationships Month, Sexual Assault Awareness Month, the Clothesline Project, Denim Day, Affirmative Consent, Safe Sex, and Pioneer Wellness Challenges. East Bay proactively builds campus and system-wide capacity through Restorative Practices and Difficult Dialogues trainings and biweekly chats, creation of the first CSU Undocumented Student Resource Center, and comprehensive communications regarding the CSU Time, Place and Manner Policy and East Bay Addendum. The Chancellor's Office provided a Zoom background for Sexual Assault Awareness Month. East Bay Civil Rights has requested system-wide training for Respondent Process Advisors. Status: Completed and ongoing.

Cozen Recommendation D.3. Designate one individual with specific oversight of all university prevention and education planning and programming, preferably a full-time role without other job responsibilities.

East Bay Response: Since October 2024, the Prevention Education Coordinator/Acting Deputy Title IX Coordinator coordinates prevention and education planning and programming for the campus at .75 FTE and supportive measures at .25 FTE. Investigations were reallocated to other staff to support this role. We are committed to prioritizing prevention and education, and the current office structure includes shared responsibilities across prevention, supportive measures, and Title IX functions. While this does not fully align with the recommendation for a dedicated full-time role, we are investing in cross-training and ongoing professional development of all staff to ensure the Prevention Education Coordinator is well-supported and equipped to lead comprehensive

prevention efforts while supporting our office operations when needed. We will continue to assess the feasibility of transitioning this position to a fully dedicated role in the future. Position descriptions will be revised for this and the Director/Acting Title IX Coordinator positions, in consultation with the Chancellor's Office Systemwide Director. Status: Substantially completed. Position descriptions are in progress.

Cozen Recommendation D.3.1. This coordinator should be tasked with oversight of and responsibility for all legally-required programming under Title IX, the Clery Act, and California law.

East Bay Response: The Prevention Education Coordinator/Acting Deputy Title IX Coordinator is responsible for providing oversight for all legally-required programming under Title IX, the Clery Act, and California law. Status: Completed and ongoing.

Cozen Recommendation D.4. Continue the work of the university-wide Prevention and Education Oversight Committee (The Title IX/DHR Training Coordination Committee) to coordinate and align programming across the university.

East Bay Response: The Prevention Education Workgroup is the university-wide prevention and education oversight committee for East Bay, which is coordinated by the Prevention Education Coordinator/Acting Deputy Title IX Coordinator to plan and align programming across the university. Status: Completed and ongoing.

Cozen Recommendation D.4.1. The Committee should include all departments who provide training, prevention and education, including, at a minimum, representatives from the Title IX/DHR program, the confidential advocate, student affairs, student health, counseling, University Police Department, athletics, fraternity and sorority life, residential life, human resources and employee labor relations, academic/faculty affairs, DEI professionals, identity-based affinity centers, university subject-matter experts, and staff, faculty, and student representatives.

East Bay Response: East Bay Prevention Education Workgroup includes all departments who provide training, prevention, and education. Membership includes representatives from East Bay Civil Rights, Confidential Advocate, Student Affairs, Student Health and Counseling, University Police Department, Athletics, Greek Life, Residential Life, Human Resources, Clery, University Diversity Office, Student Affinity Centers, Director of Recreation and Wellness, Faculty Development, Associated Students, Inc. Director of Communities, and other student representatives. Status: Completed and ongoing.

Cozen Recommendation D.4.2. The Committee should include subcommittees, as determined by the Committee. Committees may focus on the needs of various constituencies (undergraduate students, graduate students, staff, administrators, and faculty) or the types of programming (compliance, professional development, prevention and education, bystander intervention, etc.).

East Bay Response: East Bay Prevention Education Workgroup supports subcommittee work if recommended by the Prevention Education Coordinator/Acting Title IX Coordinator as needed for various constituencies. The Prevention Education Workgroup includes the Associated Students, Inc. Director of Communities, who oversees Associated Students, Inc (ASI). At-Large Senators focus on the needs of specific segments of the student population. These include undergraduate students, graduate students, international students, transfer students, online students, Greek Life, parenting students, veteran students, and diverse students. The Prevention Education Workgroup also addresses the needs of staff, administrators, and faculty, through compliance training, professional development, prevention education, and mandated reporter/bystander intervention training. Status: Completed and ongoing.

Cozen Recommendation D.4.3. The Committee should be charged with reviewing prevention program content, evaluating proposed programming or speakers, ensuring that prevention-related communications are reaching all constituents, and developing and implementing a mechanism for assessing effectiveness including by monitoring participation levels and measuring learning outcomes.

East Bay Response: Under the guidance of the Prevention Education Coordinator/Acting Deputy Title IX Coordinator, the East Bay Prevention Education Workgroup reviews prevention program content, provides input on proposed programs or speakers, and works to ensure prevention-related communications reach all constituents. Mechanisms for assessing effectiveness include focus group testing with peer health educators, monitoring participation levels, and gathering post-training feedback to assess learning outcomes. Status: Completed and ongoing.

Cozen Recommendation D.5. With assistance from the Chancellor's Office, develop a strategic plan for university programming that identifies all training requirements under federal and state law and CSU policy, all constituencies and constituent groups in need of training, and all potential university partners that can collaborate to deliver content.

East Bay Response: The East Bay Prevention Education Workgroup has a strategic plan for university programming that has identified all training requirements under federal and state law pertaining to Title IX/DHR and CSU policy, all constituencies and constituent groups in need of training, and potential university partners that can collaborate to deliver content. In AY 2024-25, East Bay provided online training as well as over 200 in-person training and learning activities, reaching 2000+ students and 2000+ staff and faculty. Three quarters of in-person events were designed for and advertised to students. Status: Completed and ongoing.

Cozen Recommendation D.5.1. Constituent groups subject to required training should include students (undergraduate and graduate); targeted student populations (athletes, fraternity and sorority life, residential students, residence life student staff, international students, student leaders); senior leadership; faculty (deans, department chairs, leads, lecturers); staff (managers,

supervisors); and campus partners who assist in the implementation of Title IX/DHR.

East Bay Response: The East Bay Prevention Education Workgroup includes the Associated Students, Inc. Director of Communities, who oversees Associated Students, Inc (ASI). At-Large Senators focus on the needs of specific segments of the student population. These include undergraduate students, graduate students, international students, transfer students, online students, Greek Life, parenting students, veteran students, and diverse students. The Prevention Education Workgroup addresses the needs of staff administrators, managers, and supervisors, and faculty, including deans, chairs, leads, and lecturers through compliance training, professional development, prevention education, and mandated reporter/bystander intervention training. Status: Completed and ongoing.

Cozen Recommendation D.5.2. Identify all university partners who provide programming, including affinity and identity-based centers and student affairs personnel.

East Bay Response: East Bay Civil Rights has identified all university partners who provide programming, including affinity and identity-based centers and student affairs personnel. They include Wellness, Peer Health Educators, Clinical Health Counselors, Confidential Advocate, Counseling, University Diversity Office, Student Leadership and Involvement Center (SLIC), Diversity and Inclusion Student Affinity Resource Centers, Asian Pacific Islander Success Center, Black Student Success Center, Undocumented Student Resource Center, Latinx Student Success Center, Veteran Student Center, Black Student Union, Gujrati Students Association, Pilipinx American Student Association, Queers United, Wayfinder (Pacific Islander Student Club), Accessibility Services, Greek Life, Transfer Student Programs, Parent & Supporter Programs, Orientation Coordinators, Academic Advisors, and Welcome Center. Status: Completed and ongoing.

Cozen Recommendation D.5.3. Identify opportunities for virtual and in-person engagement.

East Bay Response: East Bay Civil Rights identified and presented opportunities for both virtual and in-person engagement. Status: Completed and ongoing.

Cozen Recommendation D.5.4. Develop core principles and standards for content development.

East Bay Response: In March 2024, East Bay Civil Rights adopted norms for program development that include a streamlined web presence, accessibility, inclusion, and avoiding duplication of effort. Since October 2024, every training or learning activity includes learning objectives, specific content, and activities to encourage active engagement with the content, such as scenario discussions, reflection, drawing, moving, voting, and sharing. Core principles include being welcoming to all perspectives, designing activities where there is no "right" or "wrong" to respect difference, avoiding models of passive engagement, and testing activities with student focus groups. For example, for Healthy Relationships, we designed a game in which participants hear a statement about a friend or partner, move under a green, yellow, or red flag, and then have an

opportunity to share why they picked that color and consider different points of view. It is also a great opportunity for East Bay Civil Rights staff to hear and learn from students. Status: Completed and ongoing.

Cozen Recommendation D.5.5. Build a university calendar that includes online modules, social norm campaigns, orientation for students and employees, recurring opportunities for programming, and awareness events.

East Bay Response: East Bay Civil Rights posts a calendar of events on our website that includes in-person events, social norm campaigns in the form of awareness months, and links to online modules under Resources for Students and Resources for Faculty and Staff. In-person events include orientation for students and employees. Most of these are recurring events, building on success from prior years. Status: Completed and ongoing.

Cozen Recommendation D.6. Facilitate a consistent communication plan each semester that includes dissemination of the policy, notice of nondiscrimination, reporting options and resources.

East Bay Response: The East Bay Civil Rights communication plan includes disseminating the Notice of Nondiscrimination and a link to the most current CSU Nondiscrimination Policy to faculty, staff, and students via Massmail each semester. Our website features "Reporting and Options," with the Incident Reporting Form prominent as the first link, and information about Rights and Options. We offer our phone numbers, emails, and office location so that reporters may call, write, or walk in. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the website and incident reporting form was distributed throughout campus via 2500 stickers in October 2023 and May 2025. All outreach letters based on incident reports already received include information about supportive measures, support resources, the Confidential Advocate, Counseling, the University Police Department, and assistance with filing a police report. In AY 2024-25, over 200 in-person trainings and activities reaching 4000+ students, staff, and faculty reinforced reporting, options, resources, and capacity building around conflict resolution. Status: Completed and ongoing.

Cozen Recommendation D.7. Ensure that programming is coordinated, communicated and tracked.

East Bay Response: The East Bay Prevention Education Coordinator ensures programming is coordinated, communicated, and tracked. Status: Completed and ongoing.

Cozen Recommendation D.8. Develop a university website dedicated to prevention and campus programming that is kept current, facilitates distribution of prevention and education materials, and incorporates the opportunity for feedback and recommendations.

East Bay Response: The East Bay Civil Rights website is dedicated to prevention and campus programming as well as reporting and resources related to nondiscrimination. We keep the website current by having edit access for most areas and knowledgeable staff on our team. Every page includes a "Contact Us" footer with multiple ways to contact any team member with feedback or recommendations, including via phone, email, or walk-in. Status: Completed and ongoing.

Cozen Recommendation D.9. Identify social media platforms and other vehicles for distributing programming information on a regular basis.

East Bay Response: East Bay Civil Rights has identified social media platforms and other vehicles for distributing programming information on a regular basis (e.g., Instagram). Status: Completed and ongoing.

Cozen Recommendation D.10. In conjunction with the Chancellor's Office, expand professional development and training for faculty and staff, including senior leadership, deans, department chairs, managers and leads on Title IX and DHR; respectful and inclusive environments; conflict resolution; bystander intervention strategies; effective leadership and supervision; and, reporting responsibilities under Title IX, the Clery Act, and CANRA.

East Bay Response: In AY 2024-25, East Bay Civil Rights delivered over 52+ in-person professional development and training events reaching over 2100 faculty and staff. Attendees included senior leaders, deans, chairs, managers, and leads. Topics included Title IX, DHR, bystander intervention strategies; respectful and inclusive environments including Difficult Dialogues training; conflict resolution; restorative practices; effective leadership and supervision; and mandated reporting under Title IX, Clery, and California Child Abuse and Neglect Reporting Act (CANRA). Status: Completed and ongoing.

Cozen Recommendation D.10.1. Ensure the training includes information about prohibited consensual relationships given the significant overlap of prohibited consensual relationships with Title IX, DHR and other conduct of concern.

East Bay Response: Since March 2024, East Bay Civil Rights' instructor-led training on Title IX/DHR for mandated reporters includes content on prohibited consensual relationships. Status: Completed and ongoing.

Cozen Recommendation D.11. Create routine training, education, and professional development opportunities to cultivate competencies in navigating difficult conversations, bridging differences, and modeling respect and civility.

East Bay Response: In AY 2024-25, East Bay offered over 55 in-person professional development and training opportunities, reaching over 2100 faculty and staff. Topics included Title IX, DHR,

respectful and inclusive environments, Difficult Dialogues training, conflict resolution, restorative practices, effective leadership and supervision, respect, civility, and freedom of expression. Since 2019, East Bay has engaged with multiple external professional organizations for training in key areas: trauma-informed interviewing techniques and documentation, policy-based elements, bridging differences, microaggressions, options for supportive measures, investigation planning, report writing, and training on software. Status: Completed and ongoing.

Cozen Recommendation D.12. Evaluate the potential opportunities for curricular or course-based programming credential-based options.

East Bay Response: Since November 2023, East Bay has met with faculty to propose curricula and course-based projects on themes of Nondiscrimination and co-hosted multiple brown bag meetings with faculty throughout the university. This has included collaborative meetings with the Department of Social Work to design projects, academic credit, or interventions to prevent emotional or sexual abuse. Status: Completed and ongoing.

Cozen Recommendation D.13. Incorporate information about the Nondiscrimination Policy, reporting options, and confidential resources in syllabi statements.

East Bay Response: Since 2016, East Bay faculty are required to include in their syllabi the Notice of Nondiscrimination, a link to the Title IX Program website, and our contact information. Status: Completed and ongoing.

Cozen Recommendation D.14. Commit to providing programming regarding bystander engagement.

East Bay Response: East Bay Civil Rights is committed to providing programming regarding bystander engagement. Our instructor-led training deck includes multiple scenarios regarding bystander engagement. Status: Completed and ongoing.

Cozen Recommendation D.15. Participate in national conferences, listservs, networking events and other opportunities to coordinate with other professionals dedicated to prevention.

East Bay Response: Since 2020, East Bay Civil Rights staff attend annual and monthly professional development trainings offered by CSU Civil Rights. We have memberships and access to national conferences, listservs, networking events, and other opportunities to coordinate with other prevention professionals through the Association of Title IX Administrators (ATIXA), Association of Workplace Investigators, Continuing Legal Education through the State Bar, Pregnant Scholar, D. Stafford and Associates, Equal Employment Opportunity Commission, and campus-based professional development to understand and reach underserved populations within the campus community. Status: Completed and ongoing.

Cozen Recommendation D.16. Engage students in the development and delivery of programming through peer educator/peer advocate programs.

East Bay Response: East Bay Prevention Education Workgroup has student ambassadors, including the Associated Students, Inc. Director of Communities, who oversees Associated Students, Inc. (ASI). At-large Senators focus on the needs of specific segments of the student population. These segments include undergraduate students, graduate students, international students, transfer students, online students, Greek Life, parenting students, veteran students, and diverse students. Status: Completed and ongoing.

Cozen Recommendation D.17. Identify student leaders who can serve as ambassadors/promoters of this work.

East Bay Response: The East Bay Prevention Education Workgroup has multiple student ambassadors, including a graduate student in the Masters in Social Work program; a student with experience in reasonable accommodations and an interest in civil rights; and the Associated Students, Inc. Director of Communities, who oversees Associated Students, Inc (ASI). At-large Senators focus on the needs of specific segments of the student population. These segments include undergraduate students, graduate students, international students, transfer students, online students, Greek Life, parenting students, veteran students, and diverse students. Status: Completed and ongoing.

Cozen Recommendation D.18. Develop consistent on-campus opportunities to be visible and present in the community.

East Bay Response: The East Bay Civil Rights communication plan includes disseminating the Notice of Nondiscrimination and a link to the most current CSU Nondiscrimination Policy to faculty, staff, and students via Massmail each semester. Our website features "Reporting and Options," with the Incident Reporting Form prominent as the first link followed by information on Rights and Options. The Incident Reporting Form also contains a link to the full Nondiscrimination Policy. East Bay Civil Rights designed a new logo, "East Bay – Everyone Belongs." Title IX and DHR pages were consolidated as tiles on the same page. A QR code to the website and incident reporting form was distributed throughout campus via 2500 stickers in October 2023 and May 2025. All outreach letters based on incident reports already received include information about supportive measures, support resources, the Confidential Advocate, Counseling, and the University Police Department, and assistance with filing a police report. In AY 2024-25, East Bay offered over 200 in-person trainings and activities reaching more than 4000 students, staff, and faculty to reinforce reporting options and resources. Status: Completed and ongoing.

RESPONDING TO OTHER CONDUCT OF CONCERN

E. Responding to Other Conduct of Concern: We offer the following recommendations to develop

policy, infrastructure, systems, and training to address other conduct of concern:

Cozen Recommendation E.1. In conjunction with the Chancellor's Office and CSU's Office of General Counsel, develop a written policy, document, or statement by senior leadership to establish expectations, guidelines, and/or definitions of conduct.

East Bay Response: CSU Systemwide Guidance on Other Conduct of Concern was completed in January 2025. The East Bay Addendum to the Time Place and Manner Policy was published in October 2024 and can be found [here](#). Status: Completed.

Cozen Recommendation E.1.1. The written framework should address unprofessional conduct, abusive conduct, microaggressions, acts of intolerance, and other disruptive behavior in the living, learning and working environment.

East Bay Response: The Chancellor's Office Other Conduct of Concern Guidance includes unprofessional conduct, abusive conduct, microaggressions, acts of intolerance, and other disruptive behavior in the living, learning, and working environment in its definition of Other Conduct of Concern. Status: Completed.

Cozen Recommendation E.1.2. The written framework must also address intersections with free speech and academic freedom, including the explicit recognition that the CSU cannot discipline for protected speech.

East Bay Response: Frequently Asked Questions ([FAQs](#)) includes: "Does the first amendment protect speech and expression at Cal State East Bay?" and states, "Generally, yes, as Cal State East Bay is a public institution. That said, the [Time, Place, and Manner Policy](#) does provide that certain forms of disruption to classwork, substantial disorder, or invasion of the rights of others are not guaranteed under the First Amendment. The university can impose reasonable restrictions to preserve the safe and orderly operation of the campus." The East Bay Addendum to the CSU Time Place and Manner Policy was published, further clarifying these concepts as they apply to East Bay. Status: Completed and ongoing.

Cozen Recommendation E.2. Reinforce CSU values and expectations about respect, tolerance, and professionalism through programming and opportunities for in-person engagement.

East Bay Response: East Bay Civil Rights has reinforced CSU values and expectations about respect, tolerance, and professionalism through programming and in-person engagement, including training in Title IX/DHR, Respectful and Inclusive Environments, Bystander Intervention Strategies, Restorative Practices, Difficult Dialogues, and Effective Leadership and Supervision for all faculty departments, chairs and deans, students, and administrative departments. In the areas of effective leadership and supervision, and performance management, this includes Respect in the Workplace, Difficult Conversations, Communicating Cooperatively at Work, Communication between

Generations, Assertive Communication, Dealing with Triggers, Coworker Communication, and Principles of Supervision for Staff, the Chairs Academy, and standing meetings with Faculty Affairs leadership for department chairs, deans, senate officers, faculty liaison officers, and CSU statewide senators. In 2024-25, East Bay Civil Rights held 55 in-person events, providing training to over 2000 faculty and staff attendees, with managerial/supervisory personnel included at most events. During the same time period, a total of 131 in-person events provided training to over 2100 students. In 2025-26, this work will continue and expand to include train-the-trainer modules on Restorative Practices. Status: Completed.

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

East Bay Response: East Bay Civil Rights has strengthened and expanded available competencies regarding conflict resolution, navigating interpersonal conflict, restorative justice, and other forms of remedial responses. Conflict resolution capacity is embedded in leadership roles in the Offices of Diversity and Student Conduct. These roles have worked together to build on Restorative Practice and Difficult Dialogues training provided in AY 2024-25 to more than 360 employees in departments across campus and systemwide.

In 2025-26, Student Conduct and the Diversity Office will launch a train-the-trainer model to further embed these conflict resolution skills campus-wide. The train-the-trainer model has three phases: 1) consultant comes to campus to provide in-depth two-day training to employees in restorative justice practice; 2) select leadership team of three MPPs to attend an intensive institute on train-the-trainers (will occur summer 2025, commitments already made for an institute); 3) three MPPs return to East Bay to work with the Offices of Diversity and Civil Rights to devise a strategy for recruiting participants to become trainers in support of long-term capacity building for developing sustainable restorative justice practices across campus. Consultants are from the International Institute for Restorative Practices (IIRP) in Bethlehem, PA. Status: Completed and ongoing.

Cozen Recommendation E.3.1. Strengthen traditional employee relations functions within human resources to assist in responding to concerns involving faculty and staff.

East Bay Response: East Bay Civil Rights designated Other Conduct of Concern Leads for Staff and Faculty, respectively, and a dedicated Labor Relations Manager. Human Resources has reorganized to a subject matter expert/specialist model, which is intended to drive greater consistency in responding to concerns involving faculty and staff. In 2024-25, East Bay Civil Rights, Faculty Affairs, and Human Resources provided training on mandated reporting, respect in the workplace, difficult conversations, and effective leadership and supervision/performance management for supervisory personnel of faculty and staff. Status: Completed and ongoing.

Cozen Recommendation E.3.2. Strengthen competencies of managers, supervisors, deans and department chairs by providing expanded training and professional development to meet the needs of assigned roles.

East Bay Response: East Bay Civil Rights has strengthened competencies of managers, supervisors, deans, and department chairs by providing expanded training and professional development to meet the needs of their assigned roles. In the area of conflict resolution, this includes Restorative Practices and Difficult Dialogues training. In the areas of effective leadership and supervision, and performance management, this includes Respect in the Workplace, Difficult Conversations, Communicating Cooperatively at Work, Communication between Generations, Assertive Communication, Dealing with Triggers, Coworker Communication, and Principles of Supervision for Staff, the Chairs Academy, and standing meetings with Faculty Affairs leadership for department chairs, deans, senate officers, faculty liaison officers, and CSU statewide senators. In 2024-25, 55 in-person events provided training to over 2000 faculty and staff attendees, with managerial/supervisory personnel included at most events. Status: Completed and ongoing.

Cozen Recommendation E.3.3. Consider the need for additional personnel, such as an Ombudsperson or a conflict resolution professional, including those with expertise in restorative justice and mediation.

East Bay Response: East Bay Civil Rights appreciates the recommendation to consider additional personnel, such as an ombudsperson or a conflict resolution professional with expertise in restorative justice and mediation. At this time, we are pursuing a different approach by embedding conflict resolution capacity within existing leadership roles, particularly within the Offices of Diversity and Student Conduct. These offices are working collaboratively to expand campus-wide expertise through the Restorative Practices and Difficult Dialogues training delivered to more than 360 employees in 2024–25. Building on this foundation, a train-the-trainer model will be launched in 2025–26 to ensure these skills are further integrated into units across the university. This distributed approach reflects our commitment to creating a sustainable, community-embedded model for conflict resolution and restorative engagement. Status: Completed and ongoing.

Cozen Recommendation E.3.4. Develop communications competencies to embrace the tension of difficult issues including the intersections of speech in the contexts of politically and socially-charged events and issues.

East Bay Response: East Bay's Offices of Diversity and Student Conduct presented Difficult Dialogues, a series of two full day trainings system wide, in September 2024 (175 attendees) and February 2025 (135 attendees), as well as two full days of Restorative Practices training for the campus in January 2025 (62 attendees). The Diversity Office also hosted bi-weekly chats to support dialogue and create opportunities for trained facilitators to apply approaches learned in these trainings. In 2025-26, East Bay will provide additional Restorative Practices training under a train-the-trainer model to further embed conflict resolution capacity with partners throughout

campus. Status: Completed and ongoing.

Cozen Recommendation E.3.5. Communicate the new and available conflict resolution suite of resources through web content, annual training, and awareness campaigns.

East Bay Response: East Bay has communicated a suite of conflict resolution resources through a website on Freedom of Speech & Expression, in-person trainings multiple times per year (Restorative Practices and Difficult Dialogues), and awareness campaigns. These have included email notifications, newsletters, videos, posters and fliers, and in-person sessions, for example, through the President's Fall Convocation, Academic Affairs Leadership Team, Back to the Bay, Chairs Council, Associated Students Inc events., Al Fresco (fall welcome festival), and forums throughout the year hosted by the Diversity Office. In addition, East Bay Civil Rights compiled a list of on-demand trainings on CSU Learn that support conflict resolution and has provided the list to impacted parties. Status: Completed and ongoing.

Cozen Recommendation E.3.6. Invest in education and training about conflict resolution.

East Bay Response: East Bay invested heavily in education and training about conflict resolution through campus-wide capacity building and practice opportunities. The Offices of Diversity and Student Conduct presented Difficult Dialogues, a series of two full day trainings system wide, in September 2024 (175 attendees) and February 2025 (135 attendees), as well as two full days of Restorative Practices training for the campus in January 2025 (62 attendees). The Diversity Office hosted biweekly chats to support dialogue and create opportunities for trained facilitators to apply the approaches learned in these trainings. In 2025-26, East Bay will provide additional Restorative Practices training under a train-the-trainer model to further embed conflict resolution capacity with partners throughout campus. Status: Completed and ongoing.

Cozen Recommendation E.4. Create a centralized reporting mechanism that includes the option for online and anonymous reporting.

East Bay Response: East Bay Civil Rights created an online Other Conduct of Concern (OCC) Incident Reporting Form that allows any member of the campus community to submit a report, including an anonymous report. Civil Rights receives all OCC incident reports, reaches out to offer supportive measures, evaluates the information to determine whether it indicates a potential violation under the CSU Nondiscrimination Policy, and if not, refers the incident report to the appropriate OCC Lead. Faculty Affairs has taken the lead in providing training to faculty leaders, including deans and chairs. In 2025-26, the OCC Leads Team will revise the OCC incident report form for reporters to categorize the report as unprofessional conduct, abusive conduct, microaggression, intolerance, other disruptive behavior, and protected status if applicable. Status: In progress.

Cozen Recommendation E.4.1. Ensure that the landing page for the anonymous reporting option

includes appropriate caveats about the university's limited ability to respond to an anonymous report.

East Bay Response: The East Bay Other Conduct of Concern (OCC) Incident Reporting Form explains reports may be filed anonymously. The OCC incident reporting form explains anonymous reports may limit the university's ability to fully assess it. This language will be added to the landing page of the standalone website in AY 2025-26. Status: Completed and ongoing.

Cozen Recommendation E.5. Build on the efforts of the newly implemented protocol established by the President for documenting and referring the other conduct of concern, by building a triage model/review process to ensure that all reports are assessed by title IX and DHR professionals (and a subset of the Title IX/DHR MDT) and evaluate potential avenues for resolution that include the following:

Cozen Recommendation E.5.1. Identify potential policy violation and investigative response, if any.

East Bay Response: East Bay Civil Rights receives all Other Conduct of Concern (OCC) incident reports, reaches out to offer supportive measures, and evaluates the information to determine whether it indicates a potential violation under the CSU Nondiscrimination Policy and requires an investigative response. If not, Civil Rights refers the incident report to the appropriate OCC Lead. Status: Completed and ongoing.

Cozen Recommendation E.5.2. Refer to the appropriate administrator/department to coordinate/lead the response.

East Bay Response: East Bay Civil Rights receives all Other Conduct of Concern (OCC) incident reports, reaches out to offer supportive measures, and evaluates the information to determine whether it indicates a potential violation under the CSU Nondiscrimination Policy and requires an investigative response. If not, Civil Rights refers the incident report to the appropriate OCC lead. Status: Completed and ongoing.

Cozen Recommendation E.5.3. Identify reasonably available individual supportive measures, if any.

East Bay Response: East Bay Civil Rights receives all Other Conduct of Concern (OCC) incident reports, reaches out to offer supportive measures, and evaluates the information to determine whether it indicates a potential violation under the CSU Nondiscrimination Policy and requires an investigative response. If not, Civil Rights refers the incident report to the appropriate OCC Lead. Status: Completed and ongoing.

Cozen Recommendation E.5.4. Identify appropriate community remedies, if any.

East Bay Response: All Other Conduct of Concern (OCC) incident reports are tracked and evaluated for appropriate community remedies at biweekly OCC meetings attended by the OCC Lead for Students (Student Conduct Officer), OCC Lead for Faculty (Associate Provost), OCC Lead for Staff (Human Resources Manager for OCC), and Director/Acting Title IX Coordinator. The purpose of these meetings is to fully implement all OCC-related Cozen recommendations; understand documentation and resolutions; provide support for Maxient systems issues; and track and discuss any recurring protected status issues, repeat respondents, potential patterns, trends, and need for community remedies. Status: Completed and ongoing.

Cozen Recommendation E.6. The reporting and resolution processes must ensure sufficient documentation system to track responsiveness, patterns and trends.

East Bay Response: All Other Conduct of Concern (OCC) incident reports are tracked and evaluated for appropriate community remedies at biweekly OCC meetings attended by the OCC Lead for Students (Student Conduct Officer), OCC Lead for Faculty (Associate Provost), OCC Lead for Staff (Human Resources Manager for OCC), and Director/Acting Title IX Coordinator. The purpose of these meetings is to fully implement all OCC-related Cozen recommendations; understand documentation and resolutions; provide support for Maxient systems issues; and track and discuss any recurring protected status issues, repeat respondents, potential patterns, trends, and need for community remedies. Status: Completed and ongoing.

Cozen Recommendation E.7. This information should be tracked and analyzed on at least an annual basis to inform the need for remedial actions regarding culture and climate, targeted prevention and education programming, and ongoing issues of concern.

East Bay Response: Other Conduct of Concern (OCC) incident report information is tracked and analyzed at least annually by the East Bay Civil Rights Team, OCC Leads, and Case Management Team (East Bay's Multidisciplinary Team/MDT), if appropriate. The information informs the need for remedial actions regarding culture and climate; targeted prevention and education programming; and ongoing issues of concern. Status: Completed and ongoing.

CONCLUSION

In sum, this document represents the revised Implementation Plan and status of work completed as of June 9, 2025 for the 139 Cozen Recommendations. We want to sincerely thank everyone who has supported our Civil Rights Office program implementation here at CSU East Bay, where Everyone Belongs. We especially want to thank our President for her outstanding leadership, vision, and support.