



USC Responds:

Fostering a Welcoming and Inclusive Environment

AUGUST 2024



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Content Warning

This document contains information about reporting requirements for the prevention of discrimination and harassment, including sexual harassment and other forms of sexual misconduct. We recognize this may be challenging for some due to lived experiences. Please note that support resources are also available [here](#).

Executive Summary

At the **University of Southern California**, we are committed to fostering a safe and inclusive environment in which all members of our community — including students, faculty, staff, patients, and visitors — can pursue their work, education, and engagement in university programs and activities free from discrimination, harassment, and retaliation.

The university is an exceptional community of scholars, academics, learners, workers, and professionals of all industries. There are approximately 28,000 faculty and staff and 49,500 students who contribute to a wonderfully diverse and engaged community.

To pursue those goals, the university has invested significantly in the people, systems, policies, and structures necessary. This is evident in the reimagining and creation of offices dedicated to sustaining a safe, diverse, and inclusive campus environment, as well as ensuring those offices have the resources necessary to provide support and resolution options to both those who have been impacted and those who have been accused of engaging in prohibited conduct. The university also prioritizes proactive engagement with the community through ongoing comprehensive prevention and education programming.

We have heard — and taken to heart — the concerns that have been expressed regarding issues of discrimination, harassment, and retaliation, as well as inclusivity, campus safety, and transparency. With this in mind, we have developed our first annual report where we highlight these issues, celebrate the significant strides the university has made to address them, and identify trends that inform and guide our ongoing efforts. The steps we have taken to strengthen our processes and share this information are closely tied to our **Unifying Values** of Integrity; Excellence; Diversity, Equity, and Inclusion, Well-being, Open Communication, and Accountability — all of which are essential to shaping an environment where our community can thrive.

Under President **Carol Folt's** leadership, the university has engaged in a multi-tiered, multi-year set of initiatives to redesign and build systems to consistently assess, equitably address, and remedy the impacts of sexual and gender-based harassment and violence on university climate and culture — and that could withstand the impacts of COVID-19. These efforts have also had the benefit of enhancing our response to other forms of protected characteristics discrimination and harassment and addressing the February 2020 Resolution Agreement with the U.S. Department of Education's Office for Civil Rights (OCR). This includes, most importantly, providing critical support for impacted community members to ensure access to university programs and activities by all students and employees impacted by these issues, and to take action to prevent recurrence of identified issues.

The university has provided consistent and candid information to the community through direct communications, updates to various campus committees, including committees of the Board of Trustees, and updates on the **Commitment to Change** webpage, which provides information about the **OCR 2020 Findings and Resolution Agreement**, our **Continuous Efforts to Enhance University Responses**, and the **Culture Journey**. Additionally, the comprehensive information in this report consolidates our prior communications and efforts over the past several years.¹

Commissioned by **Felicia A. Washington**, Senior Vice President, Human Resources, Equity, and Compliance, the inaugural report "USC Responds: Fostering a Welcoming and Inclusive Environment" shares important information with the USC community about the university's commitment to fostering an environment free from discrimination, harassment, and retaliation on the basis of protected characteristics. It also reports on the university's commitment to promoting professionalism in the resolution of concerns that are unrelated to protected characteristics, but nonetheless have the potential to impact the workplace environment.

The programs implemented and work highlighted in this report are possible due to the collaboration by many campus partners and the unwavering commitment and provision of resources toward the prevention of all forms of discrimination and harassment, including sexual and gender-based harassment and violence, and enforcement of Title IX.

¹ For more information, see [Appendix 1: Efforts to Transform University Culture and Climate and Update on the U.S. Department of Education's Office for Civil Rights \(OCR\) Resolution Agreement](#).



THE REPORT DESCRIBES THE WORK OF THE FOLLOWING OFFICES:

Office for Equity, Equal Opportunity, and Title IX (EEO-TIX)

In August 2020, the university launched EEO-TIX, a centralized equity and civil rights office that provides consistent and equitable access to supportive measures; formal and alternative resolution options for students, faculty, and staff; education and training; and affirmative action and equity programs and services.² During this inaugural office's first two years of existence, attention was paid to how best to create a caring, effective, and high-performing consolidated equity office that serves both proactive and responsive functions. The university has invested heavily in building and resourcing EEO-TIX to support the university's efforts to foster a university climate and culture free from discrimination, harassment, and retaliation related to protected characteristics.

Over the last two years, the university has thoughtfully organized and staffed the EEO-TIX office with subject matter experts and specialists into the following roles: intake, outreach, care, and support; investigation and resolution; communications, leadership, and education; healthcare; affirmative action and equity; and administrative support.

Office of Conduct, Accountability, and Professionalism (OCAP)

OCAP was created in 2018 to investigate reported violations of university policy by faculty and staff members that involve misconduct that is persistent, pervasive, or inherently serious and that does not fall within the jurisdiction of another investigative office at USC. Efforts were made during 2021 to implement the recommendations of the 2020 OCAP Joint Committee, which

had been tasked with obtaining faculty and staff input on OCAP processes and practices. The university worked to refresh and reconfigure the approach to resolving faculty and staff concerns early and locally. This strengthening of the employee relations functions reduced the number of matters that would have traditionally been referred to OCAP for assessment and investigation.³

Office of Professionalism and Ethics (OPE)

In late 2018, the university created OPE⁴ to serve as a central intake, assessment, and tracking office for all university complaints, and to maintain the university's primary reporting hotline. (The hotline, previously known as Help & Hotline, was updated and expanded in 2023 and is now known as the [Report & Response](#) website.) Over the past several years, the university has invested in the resources necessary to expand and shift OPE's responsibilities. OPE is charged with centralizing and simplifying the process of reporting, tracking concerns, coordinating university initial responses, and performing critical quality assurance and triage functions to ensure concerns are timely referred to the appropriate university office for resolution once they are received. OPE maintains quality assurance for policy, procedure, and compliance, and, when necessary, conducts designated institutional reviews and investigations not handled by another office.

Partnering Prevention and Education Offices and Initiatives

The university engages in extensive prevention and education programming relating to sexual and gender-based

² The EEO-TIX office consolidated and realigned two separate offices that previously existed: (1) the Office of Equity and Diversity (OED), which focused on protected characteristics matters involving faculty or staff respondents; and (2) the Title IX Office, which focused on protected characteristics matters involving student respondents.

³ The functions of OCAP have now been subsumed under the broader OPE and employee relations framework.

⁴ OED, the Title IX Office, and OCAP were units within OPE at the time OPE was created.

harassment, including but not limited to sexual assault, dating violence, domestic violence, and stalking. [USC Student Health](#) primarily provides prevention programming through their offices [Relationship and Sexual Violence Prevention and Services \(RSVP\)](#) and the [Office of Health Promotion Strategy](#) for students in partnership with other campus offices including [Student Life](#) and EEO-TIX. RSVP provides prevention education, campus

and community-based resource information, and upstander behavior educational programs for students. EEO-TIX and [University Human Resources](#) also partner to offer similar training to faculty and staff. Finally, the [Office of Culture, Ethics, and Compliance \(OCEC\)](#) provides Clery Act and other mandatory reporting training programs for faculty, staff, and/or students.

INFORMED BY OUR PAST, BUILDING OUR FUTURE

These offices and other significant programming initiatives are highlighted in the enclosed report and appendices. We encourage university community members to review both in tandem as they further outline our multi-disciplinary and university-wide core initiatives to (1) transform our Human Resources, Compliance, EEO-TIX, Clery Act, Youth Protection, Student Health, and other related programs, as well as (2) incorporate lessons learned and drive change through a commitment to our Unifying Values.

We are encouraged by the progress we have made and are excited to showcase some of the many campus partnerships and efforts we have forged in pursuit of an inclusive community. And though we are gratified by the steps we have already taken, we recognize that the university's work is ongoing. We are committed to embracing this cultural and transformational journey with the humility, openness, and community engagement necessary to cultivate the campus environment we all deserve — one where all community members can live, learn, work, thrive, and know that they matter and belong.

*We are committed to embracing this **cultural and transformational journey** with the **humility, openness, and community engagement** necessary to **cultivate the campus environment** we all deserve — one where all community members can **live, learn, work, thrive, and know that they matter and belong.***

REPORTS BASED ON PROTECTED CHARACTERISTICS*

USC's Policy on Prohibited Discrimination, Harassment, and Retaliation (the Policy)⁵ prohibits misconduct based on protected characteristics. In the report, we feature several key university offices, including the [Office for Equity, Equal Opportunity, and Title IX \(EEO-TIX\)](#), which led our efforts to respond to 1,808⁶ reports of discrimination and harassment based on protected characteristics and related retaliation received between July 1, 2021 and June 30, 2022 (2021-2022).⁷

As will be discussed in greater detail in this report, every reported concern received by EEO-TIX, whatever the source, receives a response, although not every reported concern results in an investigation. Whenever possible, EEO-TIX seeks to honor the preference of the impacted party, and when reports are made by

third parties or Designated Employees, [as defined on page 16](#), who are not themselves impacted, parties sometimes elect not to pursue any services with EEO-TIX or to engage with EEO-TIX.

Sixty-nine of the 1,808 reports involved a written Formal Complaint, triggering a formal resolution⁸ path, including an investigation and a finding. In some matters, after the filing of a Formal Complaint, the parties reached an alternative resolution.⁹ As detailed in the [EEO-TIX Reports and Trends](#) section, a majority of cases that went to formal resolution involved sexual misconduct. The remainder of the matters involved other forms of discrimination, harassment, and/or retaliation based on protected characteristics (DHR).

*Protected Characteristics

"Protected characteristics" are characteristics such as actual or perceived race, color, ethnicity, religion (including religious dress and grooming practices), creed, sex, age (40 years and over in the employment context), marital status, national origin, citizenship status, employment status, income status, shared ancestry and ethnic characteristics, partnership status, medical condition (including cancer and genetic characteristics), pregnancy (including childbirth, breastfeeding, or related medical conditions), disability, political belief or affiliation, domestic violence victim status, military or veteran status, sexual orientation, gender, gender identity, gender expression, genetic information, and any other class of individuals protected from discrimination under federal, state, or local law, regulation, or ordinance in any of the university's educational or otherwise federally-funded programs and activities, and in the employment (including application for employment) and admissions (including application for admission) context. See the [university's Notice of Non-Discrimination Statement](#).

⁵ The Policy on Prohibited Discrimination, Harassment, and Retaliation applies to conduct based on protected characteristics, including reports of sexual misconduct.

⁶ This number reflects a snapshot in time and may be adjusted as the data or records are refined, which occurs, for example, when cases that are determined to be related are merged, or when duplicate entries or any entries in error are identified and deleted.

⁷ Before issuing this report, USC has taken the time to integrate data into its new enterprise-level coordinated incident response management system, to ensure delivery of a comprehensive and accurate data set.

⁸ "Formal resolution" is a pathway defined by federal regulation. Formal resolutions are initiated after the filing of a written Formal Complaint. Both parties receive a Notice of Investigation that outlines the allegations, potential Policy violations, applicable Policy and Resolution Process, support resources, how to request accommodations for disability and language diversity, assignment of the investigator and care manager, the prohibition against retaliation, and what parties may expect during the process. The matter is then assigned to a neutral investigator, who interviews the parties and witnesses, reviews any submitted and available relevant documentation, and prepares an investigative report that outlines the relevant information that will be considered in determining whether there is a Policy violation.

⁹ Alternative resolution is a voluntary, facilitated resolution option that may occur after the issuance of a Notice of Investigation. Prior to reaching a resolution under the alternative resolution process, any party can withdraw from the process, and the university will resume a formal resolution process.

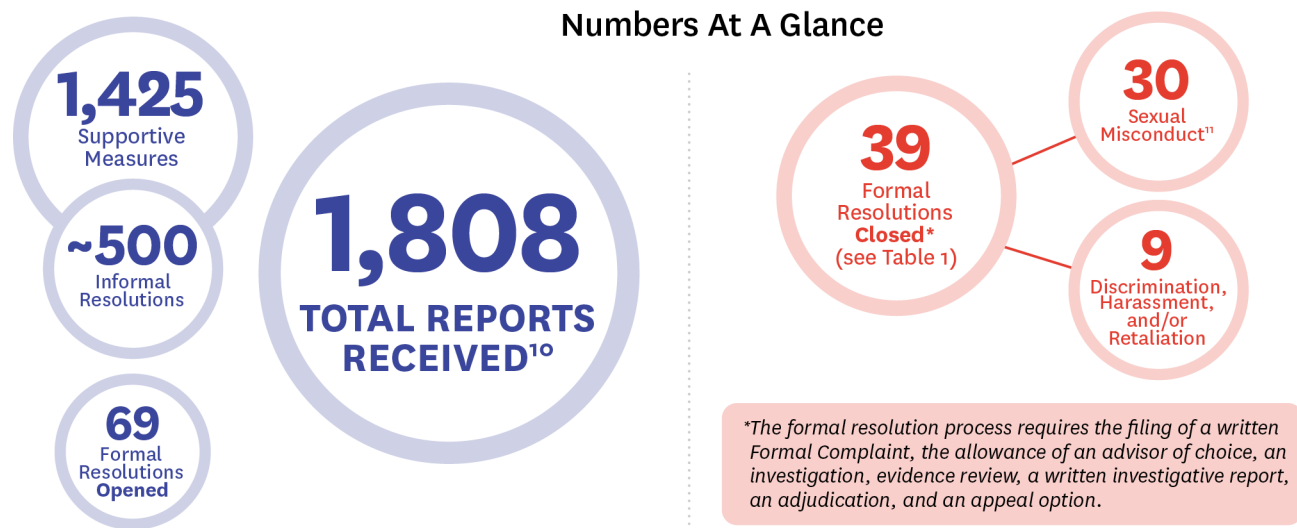
EEO-TIX addressed the remaining 1,739 of the 1,808 reports in a variety of ways based on the nature of the information reported. The various outcomes included one or more of the following:

- nearly 500 individuals sought an informal resolution (without filing a complaint) in the form of education or training for respondents (in such instances, those are voluntary meetings designed to educate and prevent recurrence of the reported conduct);
- some reporting parties sought supportive measures only (e.g., academic accommodations, connection to counseling, etc.);
- some sought only to document that an incident occurred, but desired no further action (report only);
- some initially engaged with EEO-TIX, but ultimately did not want the university to take any action and sought no assistance (preferences were typically honored if there were no prior reports or conduct history);
- some matters were referred to other offices, as they did not implicate the anti-harassment/anti-discrimination policy;
- some cases were closed due to inability to take any action because the respondents were unknown or unaffiliated with the university; and
- as described above, some parties declined to pursue any services after a Designated Employee filed a report.

Thirty-nine matters came to resolution and were closed during 2021-2022. Of these, 16 resulted in a finding of responsible for one or more Policy violations with a range of outcomes, 12 resulted in a finding of not responsible for one or more Policy violations, and eleven were dismissed after initial fact gathering. Nine of the matters with findings involved live hearings, as required by the sexual misconduct resolution process.

Finally, EEO-TIX has focused on care and outreach, providing during this time more than 1,425 supportive measures to the USC community.

The following Numbers At A Glance graphic seeks to provide two different sets of numbers to tell the story of matters received and addressed by EEO-TIX during this timeframe — Formal Resolutions Opened and Formal Resolutions Closed — recognizing that what was closed may relate to matters that were opened during a prior period.



¹⁰ The 1,808 reports received by EEO-TIX from students, staff, faculty, and other individuals resulted in a total of 2,733 potential Policy violations (refer to the [Potential Policy Violations chart](#) in the EEO-TIX Reports and Trends section), as a single report may involve multiple potential Policy violations.

¹¹ Specifics are provided within the [EEO-TIX Reports and Trends](#) section of this report.

Table 1
FORMAL RESOLUTIONS CLOSED DURING 2021-2022 (39)

Sexual Misconduct	30
Other Forms of Protected Characteristics DHR	9
Total	39
Formal Resolution Breakdown	
Total Number Resulting in Finding(s) of Responsible for Policy Violation(s)	16 (6 with a hearing; 10 without a hearing)
Total Number Resulting in Finding(s) of Not Responsible for a Policy Violation(s)	12 (3 with a hearing; 9 without a hearing)
Total Number Resolutions Dismissed ¹²	11

Non-Protected Characteristics Reports

In addition to protected characteristics reports, there were 1,014 reports received related to non-protected characteristics. The report features a representative sample of 15 non-protected characteristics reports specific to interpersonal conduct and their breakdown by case type and respondent affiliation, as well as the six types of sanctions that were imposed.¹³ The details of these can be found within the section titled [OPE Reports and Trends](#). The remaining matters were referred to the appropriate school or unit for resolution overseen by local supervisors.

Educational and Awareness Programming

The report details the extensive educational and awareness programming for students, staff, and faculty. As shown in charts within the [Prevention and Education](#) section of this report, there was nearly a 100% student completion rate of sexual assault prevention training, with an above 90% confidence rating by students in sexual assault prevention, and above 90% staff and faculty completion rate of harassment prevention training. The slight deviation from a 100% completion rate is attributable to a variety of factors, including students who are on leave or are assigned the training and then leave the university. Students assigned the training who do not complete it receive a registration hold until it is completed. ■

NEARLY
100%
Student completion rate of **sexual assault prevention training**

ABOVE
90%
Confidence rating by students in **sexual assault prevention**

ABOVE
90%
Staff and faculty completion rate of **harassment prevention training**

¹² These matters were dismissed due to a determination of insufficient information and/or a lack of jurisdiction.

¹³ Additional reports of non-protected characteristics concerns may involve areas of university policies and investigative and compliance units that are responsible for resolution outside the scope of this report. These units may include Audit Services; OCEC; the Office of Research; and the Office of Healthcare Compliance.

Office for Equity, Equal Opportunity, and Title IX (EEO-TIX)

As noted previously, in August 2020, the university created the [Office for Equity, Equal Opportunity, and Title IX](#) (EEO-TIX), a centralized equity and civil rights office, to enhance the university's timely, fair, and caring response to all reports of discrimination, harassment, and retaliation relating to protected characteristics involving community members at all of its locations, departments, institutes, and its health system, including Keck Medicine of USC and Keck School of Medicine.

Specifically, EEO-TIX's mission is to ensure equity, inclusion, and access to all university programs and services through the following core responsibilities:

Promptly and equitably **address reports** of discrimination and harassment based on protected characteristics and related retaliation.

Advance equity and equal opportunity in university programs and activities, such as admissions and employment, and management of the university's affirmative action program.

Provide supportive measures, such as reasonably available academic and workplace accommodations, with or without the filing of a Formal Complaint.

Provide prevention, education, and training programs to promote and protect the civil rights of all university community members.

The university recruited a veteran OCR professional to lead the EEO-TIX office — [Catherine Spear](#) joined USC in August 2020 as Vice President of Equity, Equal Opportunity, and Title IX and Title IX Coordinator.¹⁴

¹⁴ As shared in a [March 15 message](#) from Senior Vice President Felicia A. Washington, Linda Hoos has since stepped into the role of USC's Vice President for EEO-TIX and Title IX Coordinator.

Since its inception in August 2020, EEO-TIX has thoughtfully resourced its staff, including onboarding additional OCR-experienced staff, into the following sub-teams and areas of focus:

Intake, Outreach, and Support Team
including Deputy Coordinators and Care Managers, who are assigned to support parties (reporting parties and respondents) and individuals who report matters of concern to EEO-TIX

Healthcare Team
including a Deputy Coordinator, a Care Manager, and senior investigators

Investigation and Resolution Team
including a dedicated Hearing Manager, senior and lead investigators, and Deputy Coordinators

Administrative Support Team
for the EEO-TIX Office

Leadership, Communication, and Education Team
including an Associate Vice President and Title IX Coordinator, a Senior Deputy Title IX Coordinator, a Communications and Marketing Director, and a Training, Education, and Prevention Coordinator

Affirmative Action and Equity Team
including an Equity and Equal Opportunity Coordinator and Equal Opportunity Specialist/Senior Data Analyst

In addition to the extensive investment in building and resourcing EEO-TIX, the university has taken significant steps to foster a university climate and culture free from discrimination and harassment — those efforts are detailed in [Appendix 1](#).

EEO-TIX is responsible for implementing our Policy and applicable processes:

POLICY ON PROHIBITED DISCRIMINATION, HARASSMENT, AND RETALIATION

On Aug. 14, 2020, the university published¹⁵ its Policy on Prohibited Discrimination, Harassment, and Retaliation (the Policy), the [Resolution Process for Sexual Misconduct](#), and [Resolution Process for Discrimination, Harassment, and Retaliation](#). The Policy, which incorporates the university's [Notice of Non-Discrimination Statement](#), applies broadly to the university community, including students, student organizations, faculty and staff (including healthcare and student staff who supervise others), and third parties. It prohibits discrimination and harassment on the basis of all protected characteristics and related retaliation — the latter arising from protected activity under the Policy. The Policy applies to conduct that occurs within the university's education programs or activities within the United States and internationally. The Policy also applies to conduct that occurs outside of the university's education programs and activities, but where the university otherwise regulates the conduct, the conduct has or could have a continuing impact within the university's education program or activity, or the conduct may have the effect of posing a serious threat to the university community.

On Jan. 1, 2022, the university updated the [Policy on Prohibited Discrimination, Harassment, and Retaliation](#) and [Resolution Process for Sexual Misconduct](#) to incorporate new required elements under California Senate Bill 493, which amended the California Education Code. The Policy, Resolution

Processes, and Notice of Non-Discrimination Statement have been approved by the U.S. Department of Education's Office for Civil Rights (OCR) as fully complying with the regulatory requirements under Title IX and the requirements of the university's resolution agreement in OCR case number 09-18-6901.

Reporting Concerns

The Policy informs the community about reporting options within the university and to law enforcement. It includes the name and contact information for the Vice President of EEO-TIX, Associate Vice President and Title IX Coordinator, and Deputy EEO-TIX Coordinator for Healthcare, as well as information on how to report anonymously. Any individual may make a report of prohibited conduct under the Policy regardless of (a) affiliation with the university and regardless of (b) whether the individual reporting is the individual who experienced harm. The Policy further addresses the specifics of reports, Formal Complaints, and investigations. Reports can be made in person or by mail, telephone, electronic mail, or any other means that results in EEO-TIX receiving the verbal or written report. There is no time frame for reporting; however, evidence may become less available over time, and the university will no longer have disciplinary authority over a respondent who is no longer enrolled in or employed by the university at the time of the report, though supportive measures are still available to those impacted.

¹⁵ The Policy and Community Advisory Committee (PCAC) was created and provided input on the development of the inaugural omnibus policy.

Roles and Responsibilities

A reporting party (i.e., the individual reported to have experienced prohibited conduct) has the right (as set forth in Title IX regulations) to report, or decline to report, potential criminal conduct to law enforcement. Upon request, the university will assist a reporting party in contacting law enforcement at any time. Under limited circumstances where there is a threat to the health or safety of any university community member or as required by our memorandum of understanding with the Los Angeles Police Department, the university may independently notify law enforcement.

In addition to the above, the Policy outlines reporting responsibilities of our faculty and staff under federal and state law, the circumstances under which mandatory reports of suspected child or elder abuse must be made and to whom, and other reporting requirements under the Clery Act.

Under the Policy, Designated Employees (also known as responsible employees) are required to immediately report conduct that may be prohibited under the Policy to EEO-TIX to ensure that impacted individuals have access to supportive measures, resources, and information about procedural options and to connect individuals to the university's comprehensive centralized process for reporting to enable the university to respond appropriately to reports of prohibited conduct, including sexual misconduct. Designated Employees include, but are not limited to, faculty, academic advisors, staff employees (including student employees who hold supervisory positions), teaching assistants, research assistants, and residential assistants.

The Policy also identifies individuals who are considered confidential resources and are prohibited by state law from

sharing information with other individuals, including university officials, without consent unless required or permitted to do so by law or ethical obligations.

Available Resources

The Policy informs the community about available resources for support, including medical, emergency, confidential, non-confidential, on-campus, and off-campus resources for both reporting parties and respondents, as well as other community members. It also explains the difference between confidential and private communications in addition to the available confidential and private resources at the university. Confidential resources are detailed in [Appendix 2](#). See also the [Get Help](#) page on the EEO-TIX website.

University Response to a Report

When the university receives a report of prohibited conduct, supportive measures and information are offered to the reporting party, which are available with or without the filing of a Formal Complaint, along with the process for filing a Formal Complaint. The university will consider the reporting party's wishes with respect to supportive measures and seek to respect the reporting party's autonomy in determining how to proceed. In limited circumstances, the Vice President of EEO-TIX may file a Formal Complaint on behalf of a reporting party, initiating an investigation into reported conduct. Additional information about the circumstances that might require this action is detailed in the Resolution Processes. When a report is made, the reporting party is provided with information about the many [private and confidential resources](#) available, within the university and the local community.

RESOLUTION PROCESSES

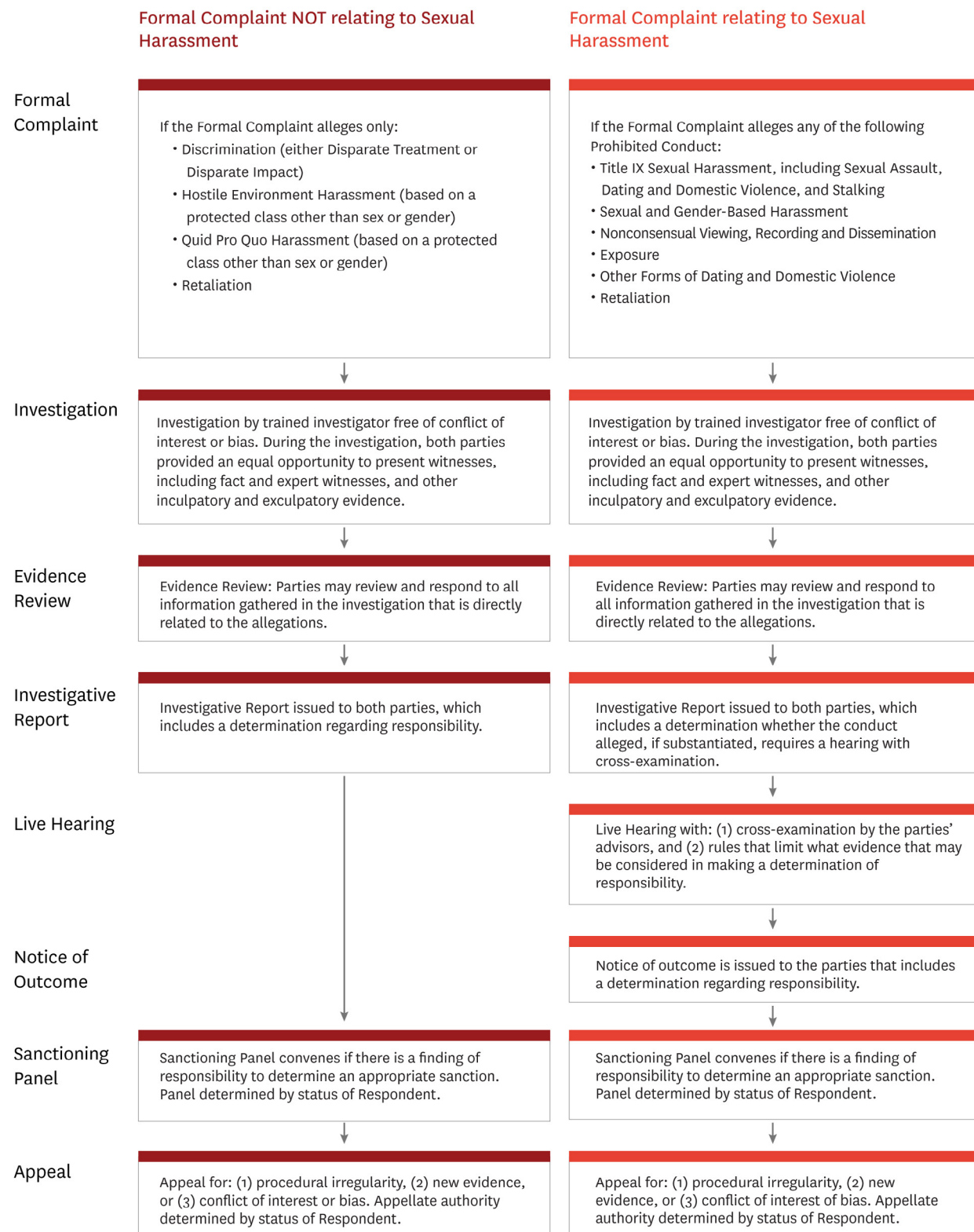
To implement this Policy, the university developed formal and alternative resolution processes to investigate and/or otherwise address reports of prohibited conduct. Because the regulatory requirements for resolution processes are more prescriptive under Title IX than for other forms of harassment, discrimination, or retaliation,

the university maintains the following two distinct resolution processes for resolving a report or Formal Complaint of prohibited conduct under this Policy:

- Resolution Process for Discrimination, Harassment, and Retaliation; and
- Resolution Process for Sexual Misconduct.



Key steps in the two formal resolution processes are outlined in the following infographic, which is also published on the [EEO-TIX website](#):



Resolution Process — Formal and Alternative Resolution

In all formal and alternative resolution processes, the university treats reporting parties and respondents equitably by offering supportive measures to both. Upon receipt of a report of prohibited conduct, EEO-TIX (1) conducts an initial assessment of the available information, in consultation with relevant stakeholders through the Initial Assessment Triage Team (IATT) process,¹⁶ and (2) considers the reporting party's preferred course of action in conjunction with the university's compliance obligations and priority to ensure the safety of the reporting party and the university community when determining how to proceed. Whenever possible, EEO-TIX will seek to honor the preferences of the reporting party as to what action, if any, they would like to be taken.

A report of discrimination, harassment, or retaliation, including Title IX Sexual Harassment or other sexual misconduct, may be resolved through:

- the provision of supportive measures only, at the reporting party's preference;
- a formal resolution process, which involves a prompt, thorough, equitable, and impartial investigation, a live hearing (if sexual misconduct), and sanctioning and an appeal, as applicable; or
- an alternative resolution process, which requires the voluntary and written consent of the reporting party and the respondent, as well as the approval of the Vice President and/or Title IX Coordinator that such a process is appropriate based on the nature of the reported concerns.¹⁷

In the Resolution Process, the parties are provided written information, which includes but is not limited to:

- the factual allegations from the Formal Complaint;
- the potential Policy violations at issue;
- their right to an advisor of choice and the role of the advisor through the process (including that any party who does not have an advisor for a hearing will be provided one at no cost);
- a statement that the respondent is presumed not responsible;
- their opportunity to review and respond to all directly related and relevant evidence before findings are made;
- the identity of the investigator, the hearing officer (in the case of a live hearing), or the facilitator of the alternative resolution process to assess any potential conflict of interest;
- notice in advance of any meeting and hearing;
- written notice of the outcome, the sanction (if any), and the rationale for both; information about the grounds for and how to submit an appeal; and
- the prohibition on retaliation.

Additionally, both parties are entitled to reasonably available supportive measures throughout the resolution process, including academic, workplace, or residential accommodations; mutual avoidance of contact directives; and access to resources, among other measures.

¹⁶ For reports involving sexual misconduct, a hate crime, or reports of a pattern of conduct involving any protected characteristic. For all other reports of prohibited conduct, an internal EEO-TIX triage team meets and consults with other appropriate stakeholders as necessary and appropriate.

¹⁷ Under state and federal law, alternative resolution, even on a voluntary basis, is never used in matters involving allegations of sexual violence or where an employee (faculty or staff) is alleged to have sexually harassed a student.

Resolution Process — Findings, Sanctions, and Appeals

When a finding of a Policy violation has been made in the formal resolution process, a Sanctioning Panel or Officer will make the sanctioning decision. For student respondents, the Sanctioning Panel is composed of two trained faculty and/or staff and one trained student who is of the same status (undergraduate or graduate) as the respondent. For faculty respondents, the Committee on Professional Responsibility serves as the Sanctioning Panel.¹⁸ For staff respondents, the Sanctioning Officer is a delegate of the Senior Vice President of Human Resources, Equity, and Compliance.

The Sanctioning Panel/Officer considers specific factors, including:

- the nature and severity of the conduct;
- the impact of the conduct on the reporting party;
- the impact or implications of the conduct on the community or the university;
- prior misconduct for which the respondent has been found responsible, including the respondent's relevant prior discipline history, both at the university or elsewhere (if available), including criminal convictions;
- whether the respondent has accepted responsibility for the conduct;
- maintenance of a safe and respectful environment conducive to learning, including whether there is a continued hostile environment on campus caused by the respondent's conduct;

- presence or absence of bias as a motivation for the respondent's conduct;
- protection of the university community requiring extended protective measures or other sanctions; and
- any other mitigating, aggravating, or compelling circumstances in order to reach a just and appropriate resolution in each case.

Both parties are able to appeal the outcome (including any findings of Responsible/ Not Responsible) and, if applicable, the sanctions, on grounds outlined in the Resolution Process. The outcome of the appeal is the final university determination.

As noted above, the university's Policy and Resolution Processes fully comply with applicable federal and state law and incorporate and reflect the values and mission of the university. The Policy and Resolution Processes undergo an annual review.¹⁹ Community feedback on the Policy is welcomed and encouraged on an ongoing basis through an online [feedback form](#) located on the home page of the EEO-TIX website. In June 2020, Senior Vice President Felicia A. Washington convened the university's Policy and Community Advisory Committee (PCAC), comprising faculty, staff, and undergraduate and graduate students, so the Policy and Resolution Processes would have community stakeholder voices when first implemented. The PCAC assisted in the development of the Policy and Resolution Processes and continues to meet periodically, so the Vice President of EEO-TIX receives ongoing input from PCAC and other key stakeholders to ensure effective implementation. ■

¹⁸ Under the Faculty Handbook, the Committee on Professional Responsibility is a subcommittee of the Committee on Tenure and Privileges Appeals. This committee is appointed by the Provost after consulting with the Chair of the Committee on Tenure and Privileges Appeals and the President of the Faculty. The Committee on Professional Responsibility includes past Presidents of the Faculty, if available, in addition to research, teaching, practitioner, or clinical-track faculty members.

¹⁹ On April 19, 2024, the U.S. Department of Education announced new Title IX regulatory requirements. The university is reviewing and will revise its Policy and Resolution Processes as necessary and appropriate in accordance with any new federal or state requirements and, when there is the discretion to do and appropriate, in response to community feedback.



EEO-TIX Reports and Trends Reports Based on Protected Characteristics for 2021-2022



During 2021-2022, EEO-TIX received:

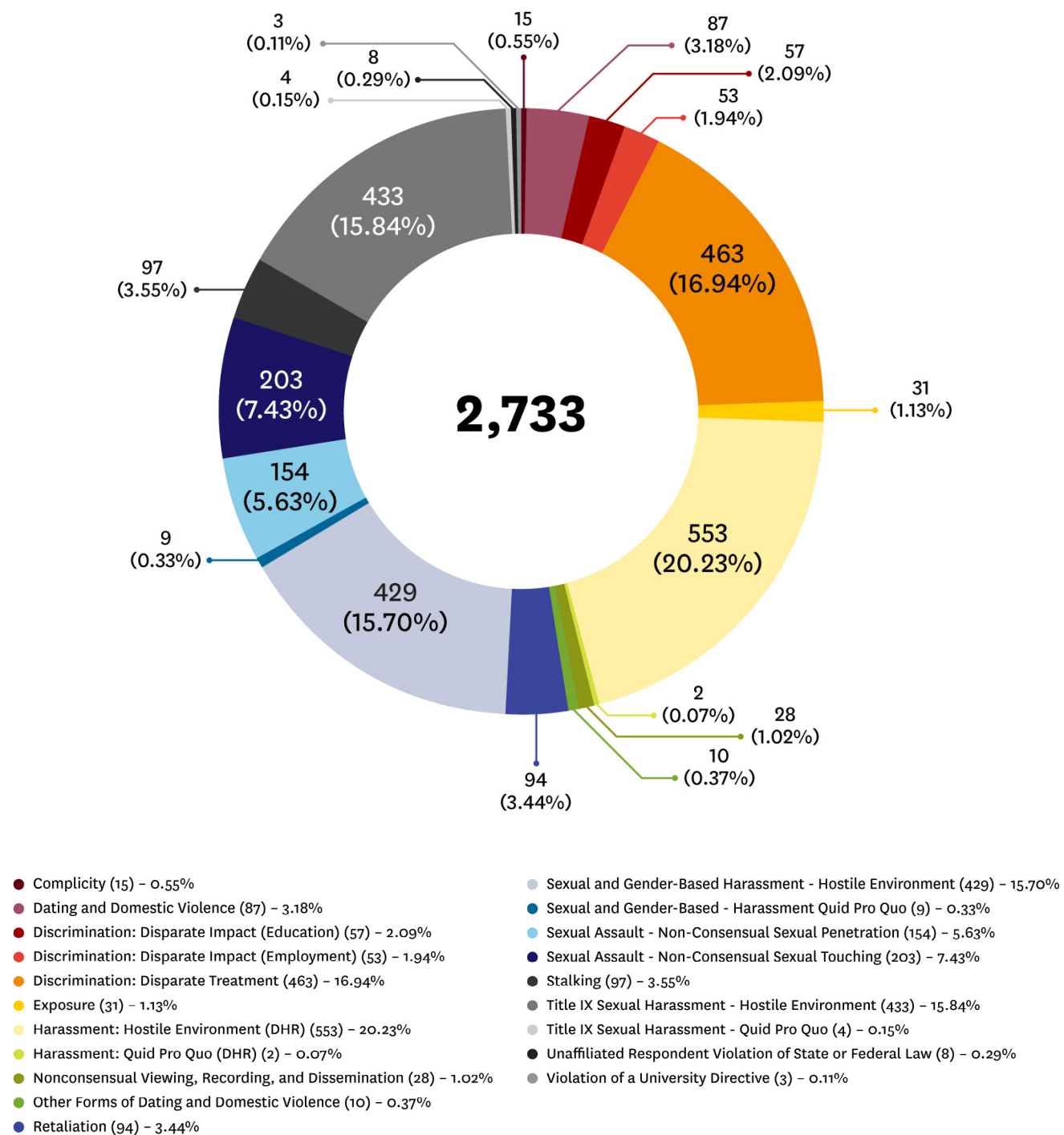


Involving students, staff,
faculty, and other individuals.

²⁰ The number of total identified respondents in the charts that follow is higher than the total number of reports, as a single report may have more than one respondent.

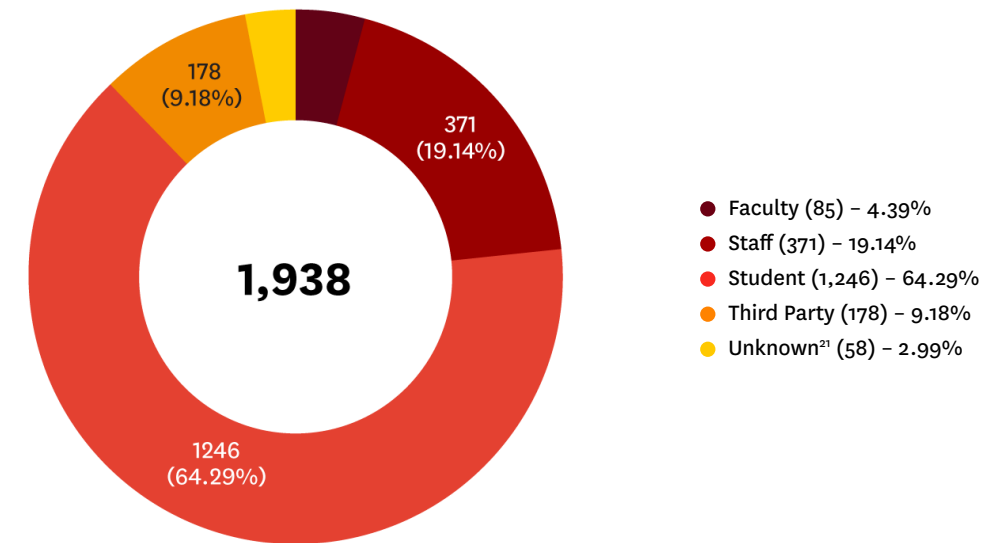
Potential Policy Violations

The 1,808 reports identifying students, staff, faculty, and other individuals as respondents gave rise to a total of 2,733 potential Policy violations, as a single report may involve more than one potential Policy violation.



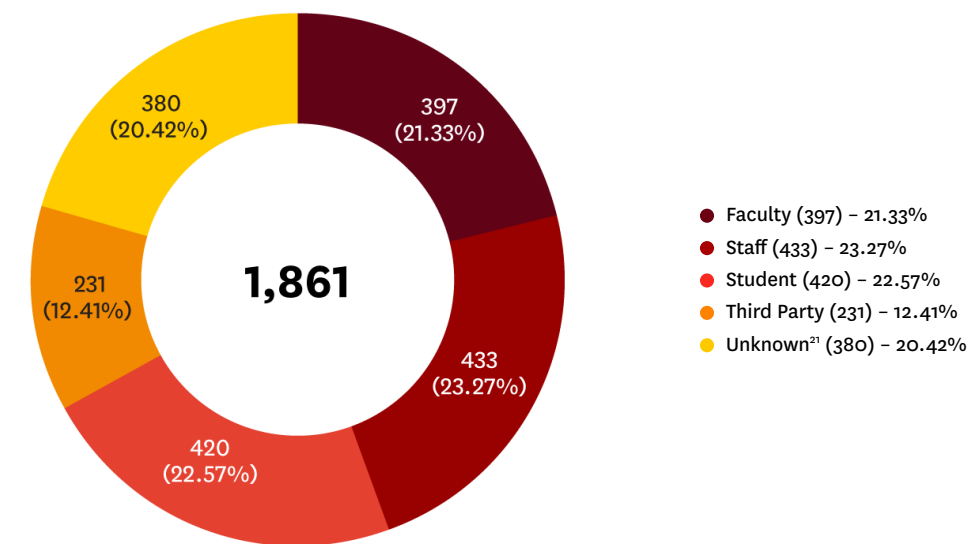
Reporting Party Affiliation

There were 1,938 individuals reported to have experienced misconduct in the 1,808 reports. They were affiliated with the university as follows.



Respondent Affiliation

There were 1,861 individuals identified as respondents in the 1,808 reports. They were affiliated with the university as follows.

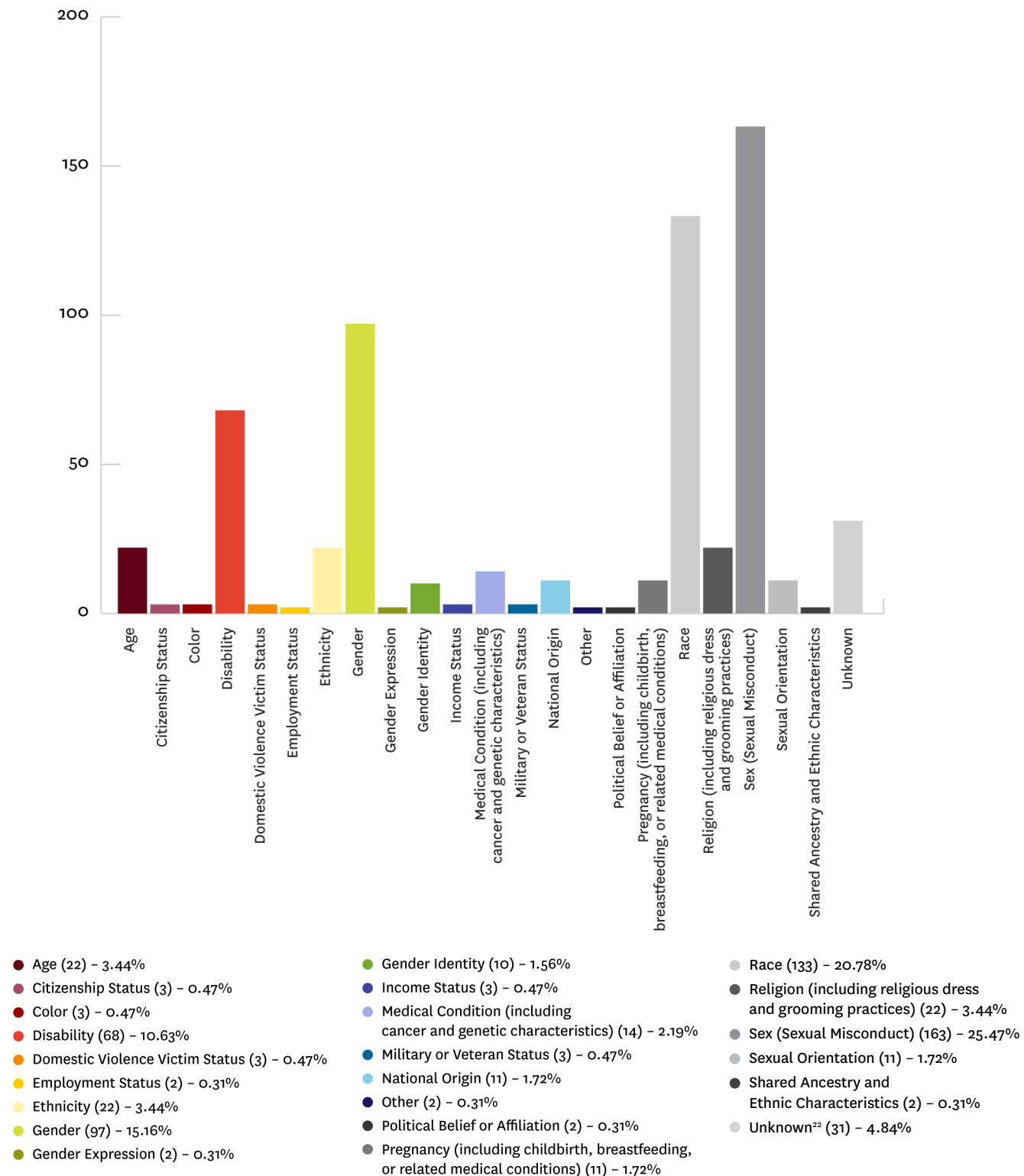


²¹ "Unknown" would indicate that insufficient information was provided to determine the full name of the reporting party and/or that individual's specific affiliation with the university.

Respondent Affiliation and Protected Characteristics Breakdown of Total Reports

Protected Characteristics: Staff Respondents

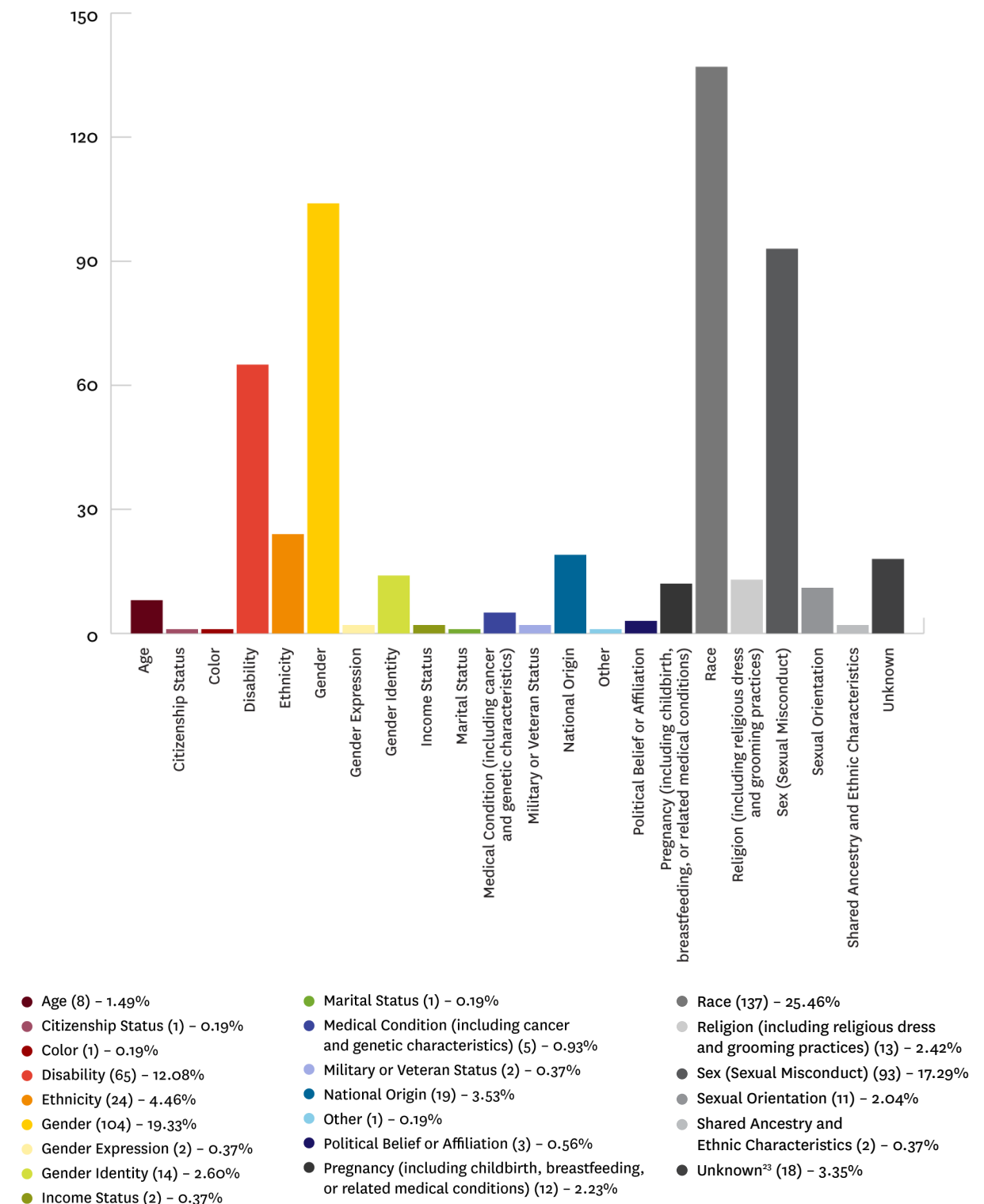
There were **640** reports concerning a staff respondent having engaged in misconduct based on the protected characteristics concerns listed in the chart below.



²² “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Protected Characteristics: Faculty Respondents

There were **538** reports concerning a faculty respondent having engaged in misconduct based on protected characteristics concerns listed in the chart below.

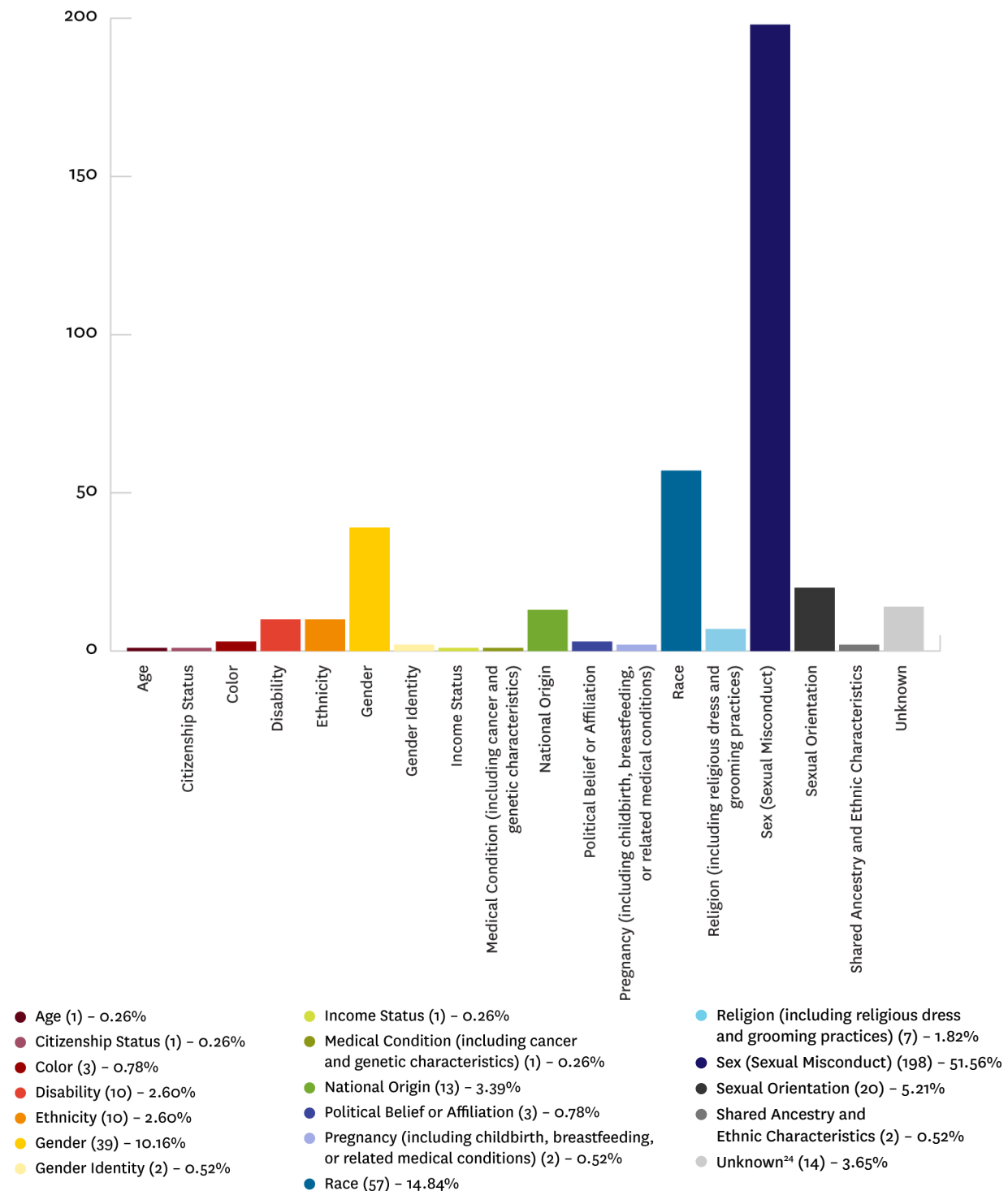


²³ “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Respondent Affiliation and Protected Characteristics Breakdown of Total Reports *Continued*

Protected Characteristics: Student Respondents

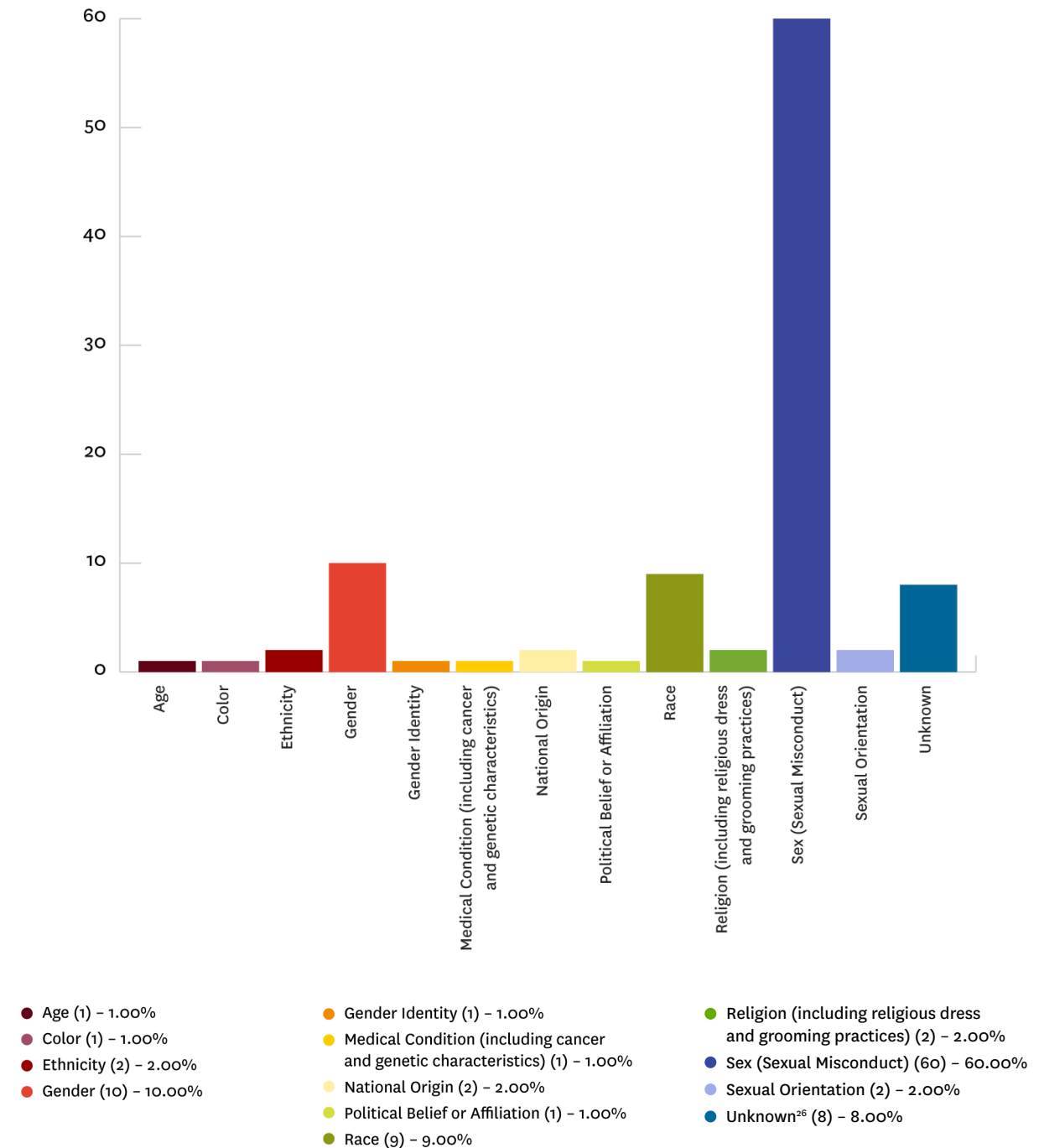
There were 384 reports concerning a student respondent having engaged in misconduct based on the protected characteristics concerns listed in the chart below.



²⁴ “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Protected Characteristics: Unaffiliated Respondents²⁵

There were 100 reports concerning respondents unaffiliated with the university having engaged in misconduct based on the protected characteristics concerns listed in the chart below.



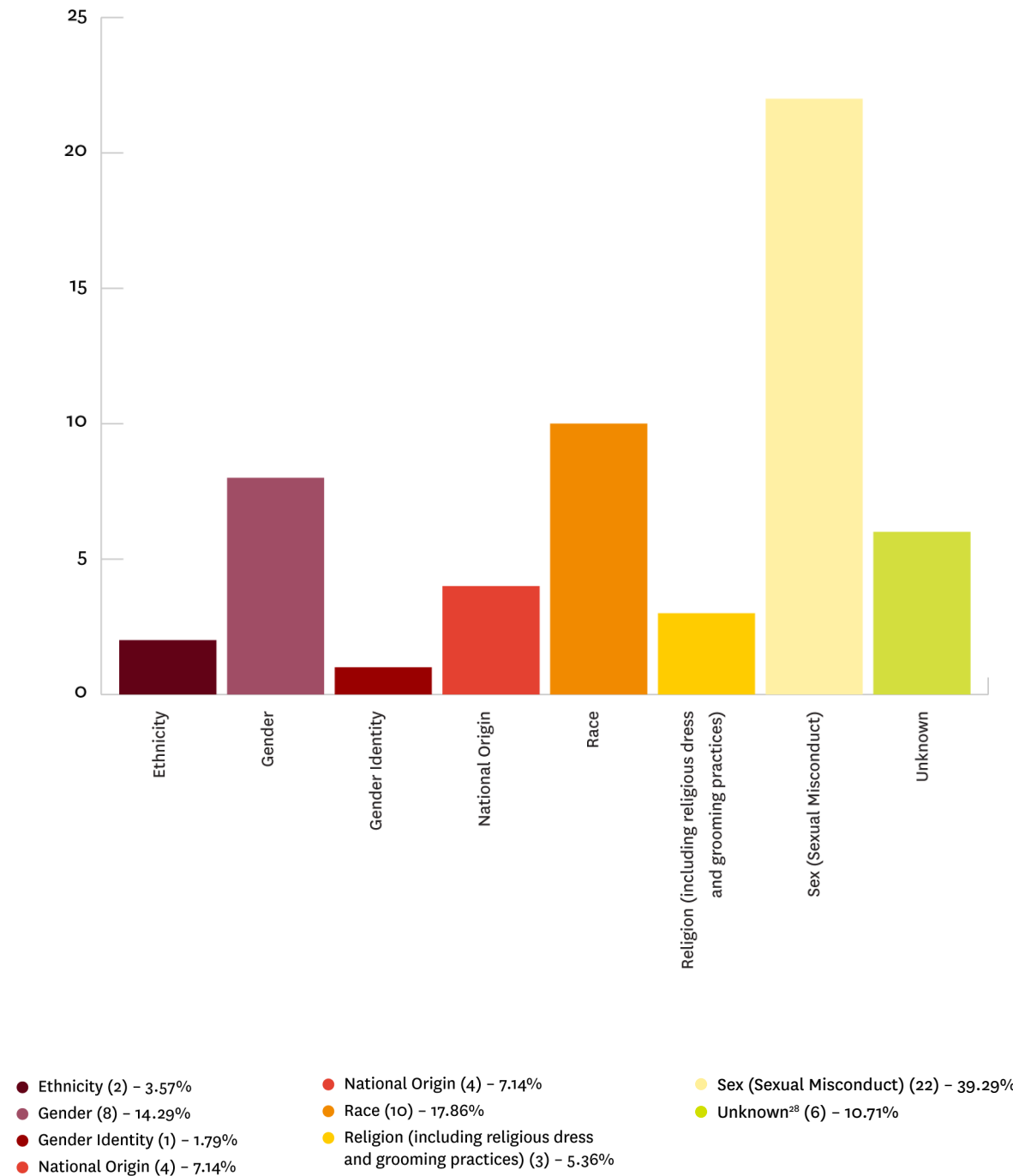
²⁵ A person is determined to be “unaffiliated” if they have no affiliation with the university as a student, faculty, or staff. EEO-TIX does not have jurisdiction to investigate or discipline individuals who are unaffiliated with the university but may offer supportive resources to impacted individuals and use the information to inform education and outreach efforts. The university may also use the available information to prohibit the unaffiliated individual from access to campus.

²⁶ “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Respondent Affiliation and Protected Characteristics Breakdown of Total Reports *Continued*

Protected Characteristics: Third Party Respondents²⁷

There were 56 reports concerning third party respondents having engaged in misconduct based on the protected characteristics concerns listed in the chart below.

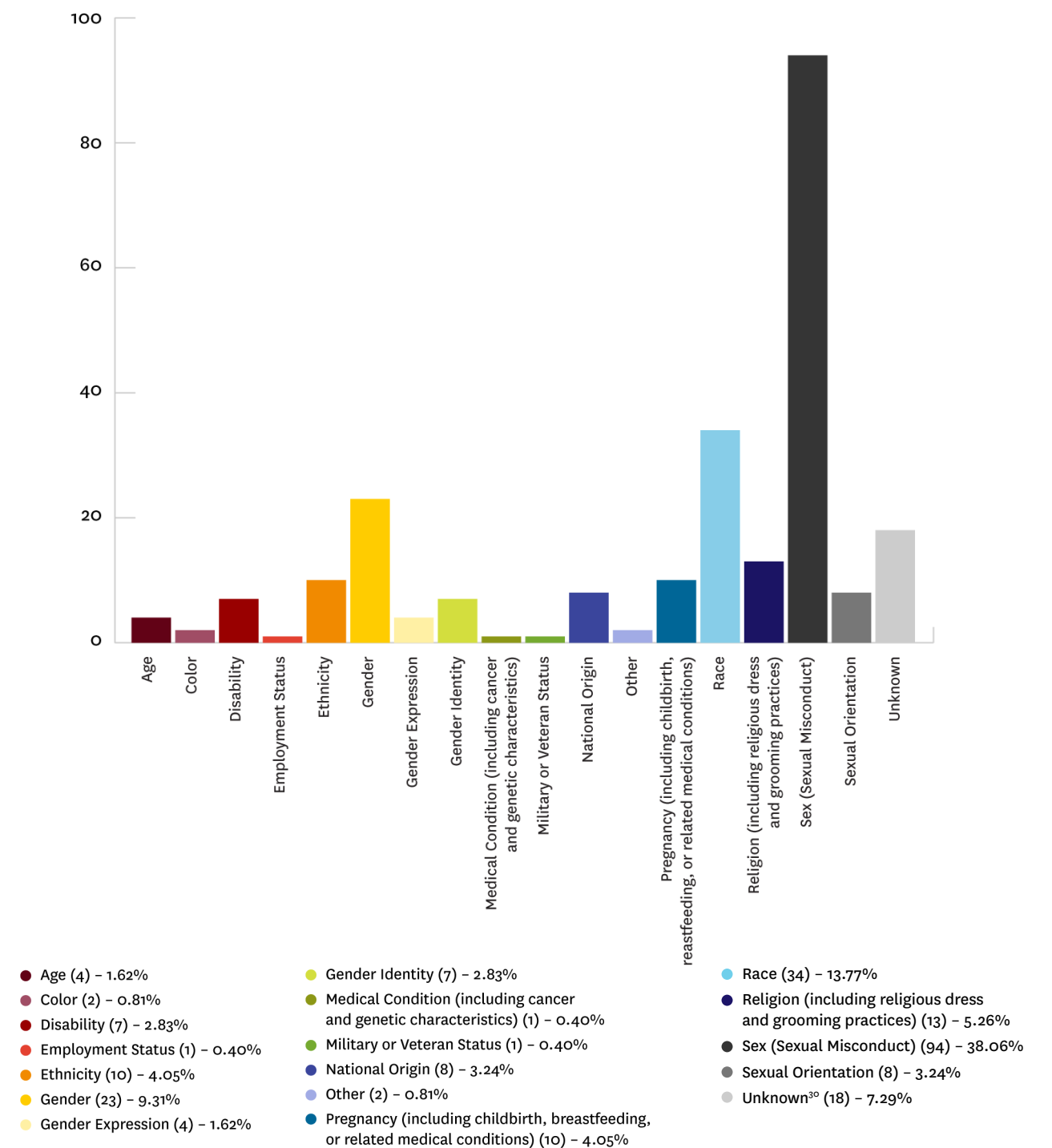


²⁷ “Third parties” typically refer to individuals who are not faculty, staff, or students but who may have some association with the university, such as contractors, alumni, vendors, or visitors. EEO-TIX generally does not have jurisdiction to investigate or discipline third parties, but may use the information to inform education and outreach efforts, or to recommend other measures, such as discontinuation of a contract with a vendor.

²⁸ “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Protected Characteristics: Unknown Respondents²⁹

There were 247 reports concerning unknown respondents having engaged in misconduct based on the protected characteristics concerns listed in the chart below.

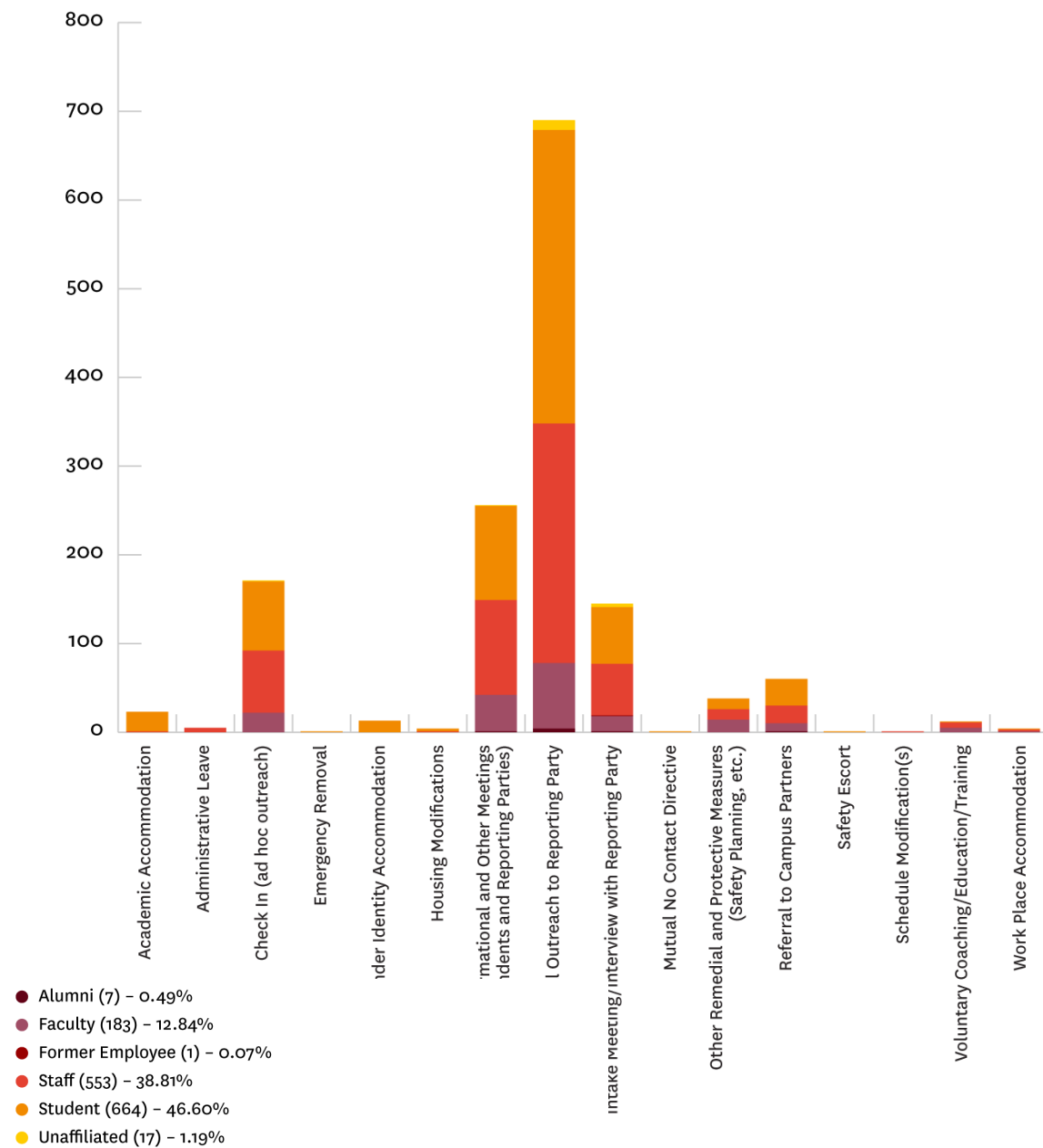


²⁹ This category includes reports made about individuals whose identity is unknown, so that EEO-TIX was not able to confirm whether the individuals were affiliated with the university. However, in such instances, EEO-TIX still offers supportive measures to identified reporting parties.

³⁰ “Unknown” refers to general reports of discrimination, harassment, and/or retaliation where insufficient information was provided to identify the specific protected characteristic.

Supportive Measures³¹

A total of 1,425 supportive measures were provided to all parties. These are individualized support services designed to restore or preserve equal access to the university’s programs and activities without unduly burdening the other party. They are non-disciplinary and non-punitive. They include measures to ensure the safety of all parties and the educational environment, and they were provided regardless of whether a formal resolution process was initiated. For individuals who are unaffiliated with the university, supportive measures include referrals to community organizations.



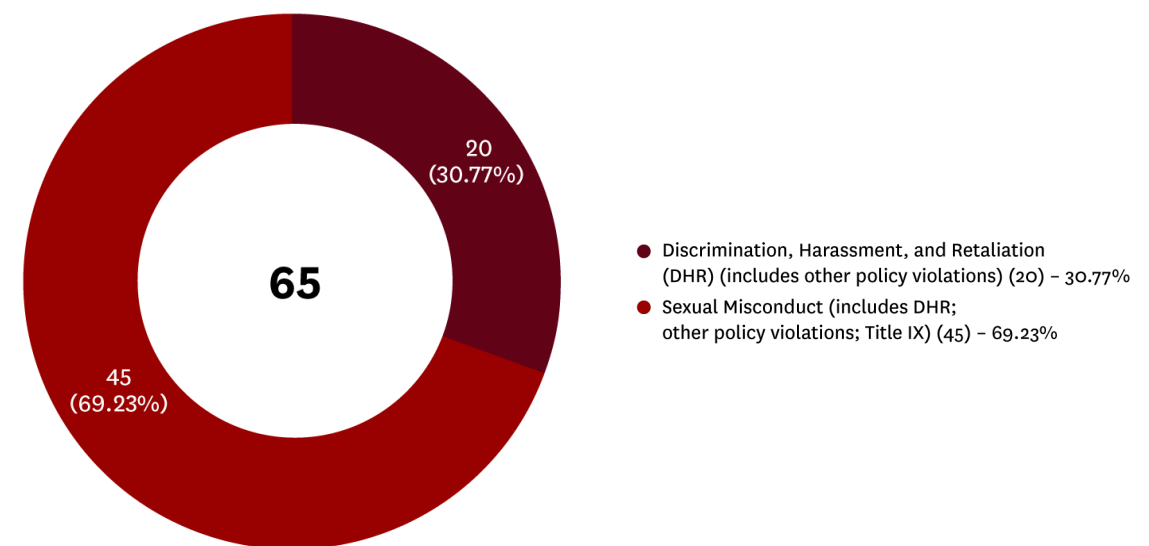
³¹ Initial outreach is included as a supportive measure, as the outreach sent contains comprehensive information about available support resources, which parties can elect to avail themselves of. In addition, the initial/intake interview is included as a supportive measure for a reporting party, as it is a meeting during which supportive resources are offered and discussed, as well as are designed to assist reporting parties with both clarifying their concerns as well as their preferred course of action.

Formal Resolutions (including Alternative Resolutions)

Pursuant to the Policy, the formal resolution process that applies to a report is based on the nature of the alleged **prohibited conduct: discrimination, harassment, and retaliation (DHR) or sexual misconduct**. If an allegation involves sexual misconduct, the matter will fall under the Resolution Process for Sexual Misconduct, even if it includes other DHR allegations.

After the formal resolution pathway is chosen, which means a Formal Complaint is filed, parties may (except for matters involving allegations of sexual violence or employee-student sexual or gender-based harassment) voluntarily agree upon terms for the resolution of the reported conduct. Alternative resolutions are tailored to the needs of the parties and supported with the assistance of a trained facilitator. If the parties are unable to reach an agreed-upon resolution, or if any party withdraws from the alternative resolution process, the matter will resume under the formal resolution (i.e., investigation) process.

There were 69 formal resolutions opened during 2021-2022. As shown in the chart below, 65 of them remained in formal resolution. The remaining four moved to the alternative resolution pathway, and one of the four successfully resolved in 2021-2022. Each formal resolution process, including the investigation and hearing (if applicable), is an administrative process designed to provide a prompt, caring, impartial, thorough, and equitable investigation and resolution of allegations of prohibited conduct. Findings and determinations of responsibility for Policy violations can only be made if a matter has gone through a formal resolution process.



Formal Resolutions Closed and Sanctions by USC Affiliation

As described previously, the formal resolution process requires the filing of a written Formal Complaint, the allowance of an advisor of choice, an investigation, evidence review, a written investigative report, an adjudication, and an appeal option. In instances in which sexual misconduct is alleged, a live hearing (which USC conducts virtually using Zoom video technology and an external Hearing Officer) is also required.

A total of 39 formal resolutions were closed during 2021-2022. Of these, 16 cases resulted in a finding of responsible for Policy violation(s), six of which included a hearing; 12 cases resulted in a finding of not responsible for Policy violation(s), three of which included a hearing; and 11 formal resolutions were dismissed after initial fact gathering (refer to [Table 1](#) in the Executive Summary). The hearings involved student, faculty, and staff respondents.

The range of responsible Policy violations addressed through formal resolutions included: sexual misconduct; discrimination, harassment, and/or retaliation; [Student Handbook](#); [Faculty Handbook](#); and/or [Staff Disciplinary Practices](#). The range of sanctions³² for the foregoing Policy violations included censure/written reprimand; education/counseling/training; financial restitution; employment termination/ineligible for rehire; and/or suspension/expulsion.³³

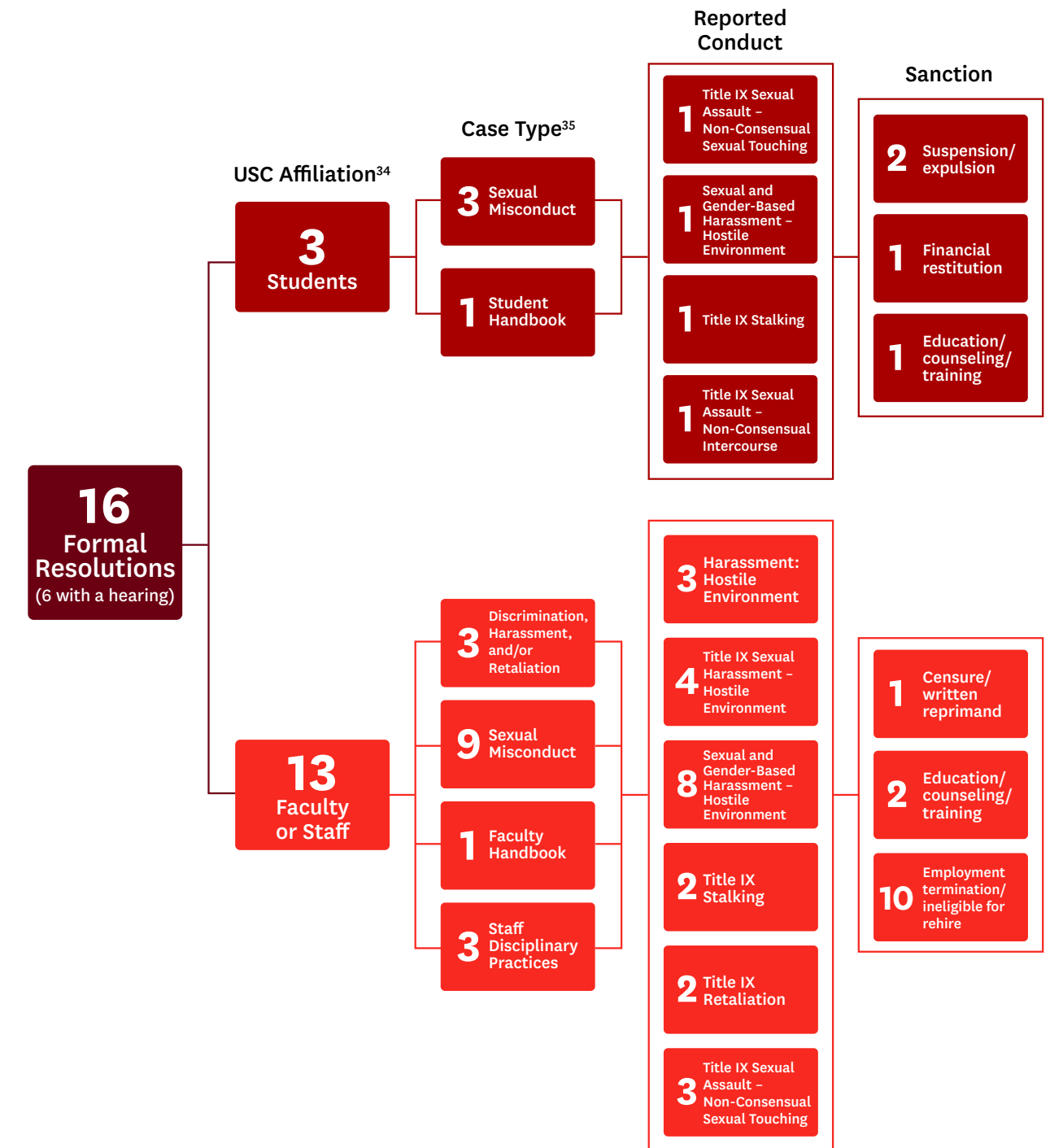
The following charts show details related to the 16 formal resolutions closed with a finding(s) of responsible for Policy violation(s) and sanction(s), and 12 formal resolutions closed with a finding(s) of not responsible for Policy violation(s).

³² A sanction is a disciplinary or corrective action imposed after it has been determined there is a Policy violation.

³³ After a Policy violation and sanctioning, EEO-TIX also makes an assessment of what additional remedial actions may be necessary for the reporting party (such as counseling) or for the community, as appropriate (such as education/training).

Responsible Findings

Sixteen formal resolutions closed with a finding of **responsible** for Policy violation.

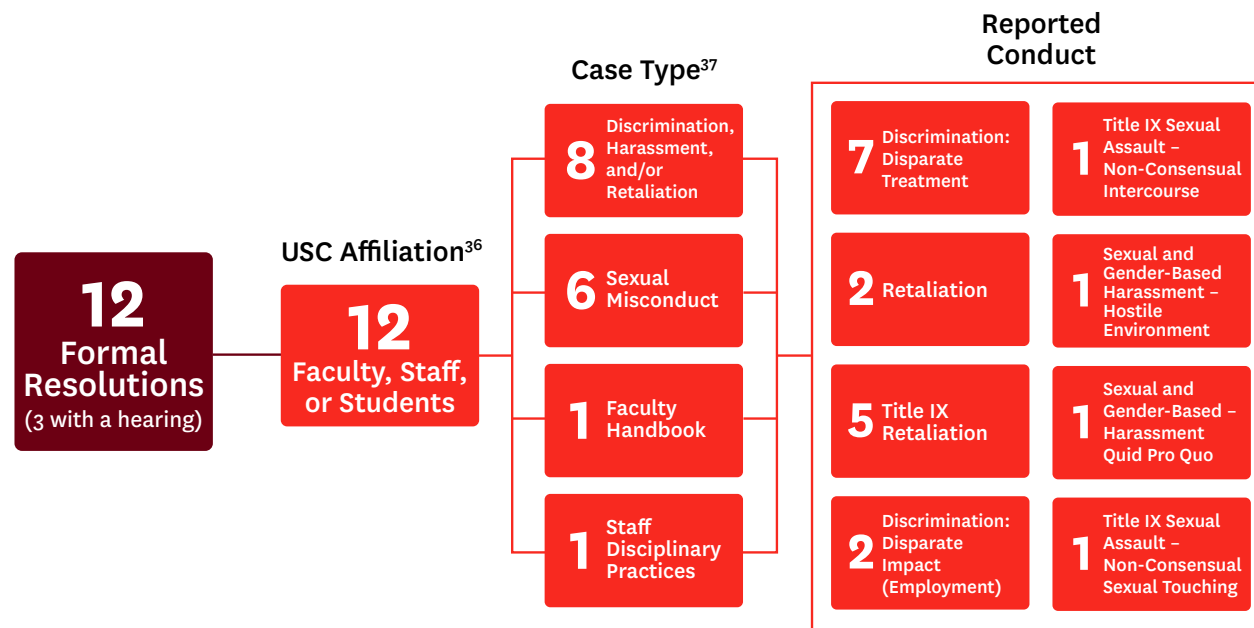


³⁴ For protection of identity, we are aggregating data where it would otherwise be required to identify fewer than three.

³⁵ The university may consolidate Formal Complaints, where the allegations of Sexual Misconduct or other forms of prohibited conduct or potential conduct code (e.g., [Faculty Handbook](#), [Staff Disciplinary Practices Policy](#)) violations arise out of the same or substantially similar facts or circumstances.

Not Responsible Findings

Twelve formal resolutions closed with a finding of **not responsible** for Policy violation.



³⁶ For protection of identity, we are aggregating data where it would otherwise be required to identify fewer than three.

³⁷ The university may consolidate Formal Complaints, where the allegations of Sexual Misconduct or other forms of prohibited conduct or potential conduct code (e.g., [Faculty Handbook](#), [Staff Disciplinary Practices Policy](#)) violations arise out of the same or substantially similar facts or circumstances.



Office of Professionalism and Ethics (OPE)

USC's [Office of Professionalism and Ethics \(OPE\)](#) was initially created in 2018 to bring all conduct investigations into a central location and to support the subsequent tracking of those complaints across the USC campuses. Over the past several years, the university has invested in the resources necessary to expand and shift OPE's responsibilities, including to streamline and simplify the process for reporting and receiving concerns.

OPE is now charged with ensuring proper and efficient handling by appropriate partnering offices, such as EEO-TIX, OCEC, Office of Healthcare Compliance, Audit Services, Human Resources, Employee and Labor Relations, Office of Athletic Compliance, Threat Assessment and Management, and Faculty Affairs. The office provides quality assurance of the compliance and enterprise-level coordinated incident response management system that serves as one source of truth for transparency and reporting back to the USC community. OPE supports the breadth of university offices to usher resolutions of a variety of complaints and concerns from students, staff, faculty, and visitors.

Serving as the assessment and tracking office for university complaints, whether received through the USC [Report & Response](#) website or through any other reporting method, OPE maintains quality assurance for policy, procedure, and compliance. When necessary, the office conducts designated institutional reviews and investigations not handled by another office.

OPE is led by [Michael Blanton](#), Vice President of Professionalism and Ethics.

REPORTING AND INVESTIGATIVE PROCESS

Reports are received through various avenues, including the newly-created and expanded [Report & Response](#) website (which replaced and updated the prior Help & Hotline) that provides options for reporting anonymously; directly from reporting parties through the office's email at ope@usc.edu and by telephone at 213-740-5755; or by referrals from other university offices.

Types of Conduct Reported

Through OPE, the university investigates reported violations of university policy that involve misconduct that is persistent, pervasive, or inherently serious but has not fallen within the jurisdiction of one of USC's other investigative offices (e.g., misconduct involving protected characteristics that would be investigated by EEO-TIX). For example, OPE generally reviews alleged misconduct that:

- has occurred before and has not been amenable to correction;
- involves multiple interactions and/or affected parties;
- involves violence or the threat of violence;
- involves the abuse of power or retaliation; or
- requires fact-finding beyond the capacity of Human Resources or Faculty Affairs.

After a second level review with an investigator, it can be determined that the local school or unit leadership is the most appropriate to respond to the report. Other times, a preliminary inquiry may be needed to help determine if a formal investigative process is warranted. A preliminary inquiry

may include interviewing the complainant or other relevant witnesses to better understand whether OPE or another university office is best suited to resolve the complaint.

The Investigative Process

The following is a high-level overview of the university investigative process for both faculty and staff, which includes several of the procedural recommendations from the 2020 OCAP Joint Committee Report (and early implementation of recommendations of the Employee Relations Advisory Group).

- The university makes outreach to the party reporting the misconduct within 48 business hours of receiving the complaint.
- The university asks the reporting party to meet for an initial interview within two weeks from the date of the outreach.
- The university seeks to decide within two weeks of the interview whether it is appropriate to (a) open an investigation, (b) reroute the matter to another university office, or (c) close the matter.
- If an investigation is warranted, the respondent is notified in writing of the investigation, the alleged conduct, and the policies implicated.
- The respondent is provided an opportunity to meet privately with an investigator to respond to the allegations and any relevant evidence the investigator will subsequently rely upon to make a finding of fact determination.
- The university makes every reasonable effort to complete a thorough investigation and determine if one or more Policy violations occurred within 120 days.

- Investigators promptly prepare a report of investigation (ROI) to be submitted to the Investigator's supervisor within 30 days of completion of the investigation.
- At the conclusion of the investigation, the reporting party and respondent are provided with the investigative findings of fact and whether the respondent violated university policy.
- If a violation of university policy was found, the matter will be referred for appropriate corrective action or sanctioning.³⁸

Faculty and staff members involved in the investigative process have access to supportive resources through the [Office of the Ombuds](#), the [USC WorkWell Center](#),³⁹ and [Campus Wellbeing & Crisis Intervention](#). The [Faculty Rights & Responsibilities Committee of the Academic Senate](#) is also an additional available resource for faculty members. ■

³⁸ OPE does not handle sanctioning.

³⁹ The WorkWell Center was previously known as the Center for Work and Family Life (CWFL).

OPE Reports and Trends Non-Protected Characteristics Reports for 2021-2022

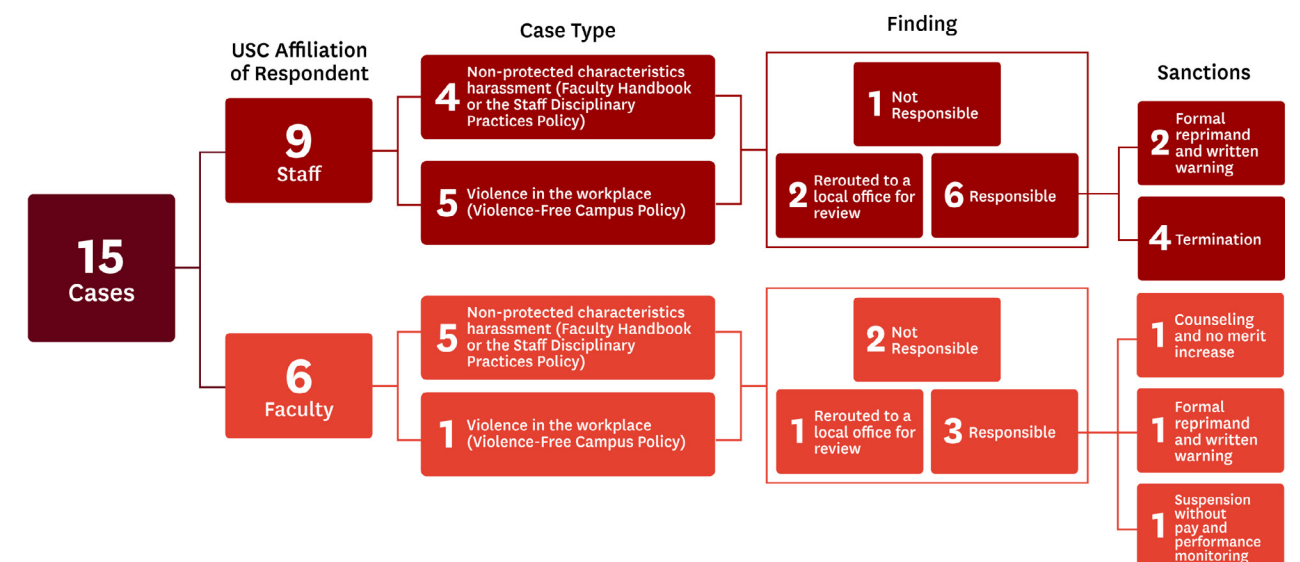
OPE received 1,014 reports that touched on a variety of non-protected characteristics conduct. Of those, most were referred to local Faculty Affairs, Human Resources, and other business offices for local resolution. Reports potentially implicating other compliance or investigative offices — such as OCEC, Audit Services, and Healthcare Compliance — were referred to those offices for evaluation of resolution options.

During 2021-2022, of the 1,014 reports, OPE referred 15 of them that involved reported concerns of non-protected characteristic interpersonal conduct against faculty and staff to OCAP for a second-level assessment to determine whether investigation was appropriate. The underlying allegations in these reports potentially met the criteria identified under “Types of Conduct Reported” (pg. 40), such as involving abuse of power or retaliation, violence or the threat of violence, or those with complexity beyond the capacity of business units to resolve. The reports were either investigated by OCAP or went through a comprehensive review that did not lead to an investigation. Six of the respondents were faculty and nine of the respondents were staff. Cases involved violations of the [Faculty Handbook](#) or the [Staff Disciplinary Practices Policy](#) addressing harassing, abusive, and intimidating behavior, or were violations of [USC’s Violence-Free Campus Policy](#).

Nine cases resulted in findings of Policy violations (three faculty and six staff), and in six cases the evidence did not yield a policy violation. Of the cases that went to the sanctioning phase, four staff were terminated or received a formal reprimand, and two faculty received suspension or counseling.

University investigators do not impose discipline on faculty and staff. The faculty Committee on Professional Responsibility (for faculty) and the Office of the Senior Vice President of Human Resources, Equity, and Compliance (for staff), respectively, determine discipline or corrective action.

Three cases were referred by OPE to the local unit for handling and resolution.



Prevention and Education

Various university campus partners — such as Student Health and EEO-TIX — closely collaborate to provide comprehensive prevention education programs that seek to prevent any form of harassment, whether based on sex, gender identity and expression, or other protected characteristics.

Under guidance from campus well-being experts, the university's training program that focuses particularly on sexual misconduct is implemented in accordance with a public health logic model. In alignment with that model, the university identifies short-, intermediate-, and long-term goals related to the development of a culture of consent and healthy relationships, including selection of effective methods to reach these goals. The logic model recognizes that sexual violence has a universal impact; that prevention requires community and pan-institutional efforts and engagement; and that efforts must be long-term and continuous. The focus of the logic model is on evidence-based and/or informed programming that is assessed annually and over time to inform ongoing program development. The outcomes over a five-year schedule include developing increased knowledge and awareness, decreasing incidence of sexual violence, and fostering increased reporting.

Prevention programming for students is primarily provided by USC Student Health's [Relationship and Sexual Violence Prevention and Services \(RSVP\)](#) in an integrated partnership with other campus offices, which includes [EEO-TIX](#). RSVP leads prevention education, provides campus and community-based resource information, and upstander behavior programs for students. The USC Student Health, [Office of Health Promotion Strategy](#) supports prevention work through routine population level data collection and community engagement, which guide

program development and implementation. Many other campus partners are also involved in proactive and prevention work, including [EEO-TIX](#), the [Office of Inclusion and Diversity](#), [University Human Resources](#), [Athletics](#), [Fraternity and Sorority Leadership Development](#), the [Office for Residential Education](#), and the [Department of Public Safety](#), each of which collectively or individually provides educational and awareness programming for students, staff, and faculty. EEO-TIX also provides online and in-person anti-harassment/anti-discrimination/anti-retaliation training, including Title IX, and OCEC provides Clery Act training programs for faculty and staff.

The annual policy review process, which, as noted earlier in the report, includes a mechanism for soliciting feedback on the Policy and Resolution Processes through a link located on the [home page of EEO-TIX's website](#), has also helped generate valuable community feedback regarding the university's prevention programming (discussed in the following respective student and employee sections).

STUDENTS

Sexual Assault Prevention Training

Undergraduate and graduate students matriculating at the university are required to complete *Sexual Assault Prevention*, an online module developed by Vector Solutions (formerly, Everfi) as part of new student onboarding, for undergraduates and graduate students, with specialized content for these

populations. The covered topics include what constitutes sexual harassment (including sexual assault, dating violence, domestic violence, and stalking); how to report instances of sexual harassment; information describing the grievance process outlined in Title IX and California state law; information about the provision of available interim and supportive measures required by law; and the prohibition against retaliation. *Sexual Assault Prevention – Ongoing* is a separate online training that is required annually for continuing students.

Evidence of Completion

Refer to the *Sexual Assault Prevention Training Completion Rates* chart on [page 51](#) to view the undergraduate and graduate completion rates for the *Sexual Assault Prevention* training module during the Academic Years 2019-2020, 2020-2021, and 2021-2022.

Evidence of Effectiveness – Undergraduates

The mandatory *Sexual Assault Prevention* training module also incorporates pre- and post-module surveys, including questions designed to gather data on how students believe the skills and knowledge they learned in the training might help them to make healthy decisions and support their peers in the future. The data revealed that an area of focus for this population in the future is additional guidance on how to identify characteristics of healthy and unhealthy relationships and information about consent, should they choose to be sexually active.

Additionally, the *Sexual Assault Prevention* survey gathers data on students' confidence in their ability to implement bystander intervention strategies, which is outlined in the *Sexual Assault Prevention Confidence – Undergraduates* chart on [page 51](#).

Evidence of Effectiveness – Graduate Students

The mandatory *Sexual Assault Prevention* online training module's pre- and post-module surveys for graduate students showed that a high percentage of the university's graduate students believed the module:

- Helped identify characteristics of healthy and unhealthy relationships (79%),
- Identify information about consent should they choose to be sexually active (80%), and
- Provided the skills to better support someone who had experienced sexual assault (80%).

Additionally, 81% of graduate students believed that their school was committed to preventing sexual assault and that there were good support resources at their school for helping students going through difficult times.

The *Sexual Assault Prevention Confidence – Graduate Students* chart on [page 52](#) outlines the data gathered from the *Sexual Assault Prevention* survey on graduate students' confidence in their ability to implement bystander intervention strategies. Similar to undergraduate students, most graduate students have stepped in to support other students to help with creating a healthy campus environment.

Additional Trainings, Workshops, and Educational Resources

In addition to the mandatory *Sexual Assault Prevention* module, all incoming students are required to take the following online trainings: *AlcoholEdu* (substance abuse prevention), *Staying Safe* (campus resources and safety tips), and Diversity, Equity, and Inclusion, which are managed by other campus partners.

Trojans Respect Consent Workshop – Undergraduates

Since Fall 2019, all incoming first-year undergraduate students have also been required to participate in *Trojans Respect Consent (Consent and Healthy Relationships module 1, CHR1)* during their first six months on campus. *Trojans Respect Consent* centers on practicing how to engage in conversations about sexual activity with other students and was specifically developed for incoming first-year students.

The workshop provides an opportunity to understand how to clearly communicate permission, boundaries, and consent in intimate encounters. Discussion is limited to new USC students and is conducted in small groups so participants can ask questions and participate in a frank conversation.

Evidence of Engagement

In Academic Year 2021-2022, RSVP conducted 164 *Trojans Respect Consent* workshops, encompassing 2023 students. Beginning in Academic Year 2022-2023, all incoming students are required to complete the program in order to register for courses during the second year.

Evidence of Effectiveness

The required *Trojans Respect Consent* training module incorporates pre- and post-module surveys, including questions designed to gather data on students' attitudes, beliefs, skills gained, and confidence in skills gained.

Healthy Relationships Workshop – Undergraduates

Since Fall 2020, all incoming second-year undergraduate students have been required to participate in the *Healthy Relationships (Consent and Healthy Relationships module 2, CHR2)* workshop, which provides more

in-depth information about topics covered in *Trojans Respect Consent* and how to build these skill sets. The workshop focuses on learning the fundamentals of healthy relationships, such as boundaries and communication, and acquiring tools to recognize and navigate unhealthy or abusive relationships.

It covers power dynamics and mutual respect in intimate partner relationships. Participants explore skills for setting expectations that are foundations for healthy and mutually supportive partnerships, as well as learn to recognize and manage unhealthy or abusive relationships.

Evidence of Engagement

In the second year that this program was initiated (Academic Year 2021-2022), RSVP conducted 137 *Healthy Relationships* workshops, encompassing 2,613 students. Beginning in Academic Year 2023-2024, all students will be required to complete the program in order to register for courses during the third year.

Evidence of Effectiveness

The required *Healthy Relationships* training module also incorporates pre- and post-module surveys, including questions designed to gather data on students' attitudes, beliefs, skills gained and confidence in skills gained.

Sexual Harassment Workshop – Graduate Students

Since Fall 2021, graduate students participate in *Sexual Harassment (for Graduate Students)*, a workshop specifically designed for graduate/professional degree students navigating their academic careers and professional networks. Participants develop a better understanding of what rape culture is, identify what sexual harassment looks like,

and access techniques to intervene and respond to sexual harassment. Registered graduate student organization leaders are also able to secure additional funding from Graduate Student Government by attending this workshop.

Bystander Training

Starting in 2019, the university also sponsored and coordinated [Bringing in the Bystander](#) training for student leaders and a select group of faculty and staff in collaboration with Undergraduate Student Government. The university has branded the Bringing in the Bystander training under the campaign *Trojans Act Now! (Consent and Healthy Relationships module 3, CHR3)* Beginning in Fall 2021, all incoming third-year undergraduates were required to complete the program.

This in-person educational program encourages participants to become positive upstanders in instances of sexual and interpersonal violence and harassment, teaches skills and knowledge to intervene before or during an incident, speak up when their peers make light of sexual or dating violence, support survivors of trauma, and practical skills for safe and effective intervention. Undergraduate registered student organizations (RSOs) whose leadership teams completed the workshop were eligible to receive bonus funding from Undergraduate Student Government starting in Fall 2020.

Evidence of Engagement

In Academic Year 2021-2022, RSVP conducted 108 *Trojans Act Now!* workshops, encompassing 2,062 students. Beginning in Academic Year 2023-2024, all students will be required to complete the program in order to register for courses during the fourth year.

Evidence of Effectiveness

The required *Trojans Act Now!* training module also incorporates pre- and post-module surveys, including questions designed to gather data on students' attitudes, beliefs, skills gained and confidence in skills gained.

EEO-TIX's Education

Resources and Offerings

In addition to the online mandatory training and other courses and workshops conducted by RSVP, EEO-TIX also provides in-person and virtual training and prevention education programming across the university to provide students with information that includes but is not limited to: the Policy on Prohibited Discrimination, Harassment, and Retaliation and related Resolution Processes; their rights and responsibilities under the Policy; who are Designated Employees, including in the healthcare context; how to make a report; and available resources and supportive measures.

This information is included on an annual basis in undergraduate, transfer, and graduate orientation programs, and it is provided to student organizations, including members of the Trojan Marching Band; members of the Interfraternity Council and National Panhellenic Council; and student-athletes (also in compliance with National Collegiate Athletic Association requirements). Other participants include: students who serve in the capacity of resident assistants; teaching assistants; student employee supervisors; and other roles that are considered Designated Employees, as well as students in specific schools or programs, such as within the USC Keck School of Medicine, Ostrow School of Dentistry, Viterbi School of Engineering, Marshall School of Business, Gould School of Law, and Dornsife College of Letters Arts and Sciences.

During Academic Year 2021-2022, EEO-TIX provided:



EEO-TIX also has created content and participated in programming intended to advance equity and prevent discrimination and harassment, including Title IX 50th Anniversary, Pride Month, International Pronouns Day, and Sexual Assault Awareness Month events.

FACULTY, STAFF, AND STUDENT WORKERS

Since 2005, all university supervisors have been required to complete a mandatory two-hour harassment prevention training, *Preventing Harassment and Discrimination: Supervisors with Title IX/Clery Module*, within six months of hire or promotion into a supervisory role and then as part of our routine cycle every two years thereafter, in compliance with California state law. Required participants at USC include faculty; employees designated at the manager level or above, regardless of whether they currently supervise employees; employees who supervise other employees; postdoctoral scholars who supervise others; and student workers who supervise others.

Starting in Fall 2019, a similar biennial requirement was imposed for all university employees following changes in California state law that require California employers of five or more employees to provide at least

one hour of sexual harassment prevention training to all non-supervisory employees within six months of hiring and to repeat the training every two years. All employees now complete at least a one-hour training on sexual harassment and abusive conduct prevention (*Preventing Harassment and Discrimination: Non-Supervisors with Title IX/Clery Module*) every two years.

Preventing Harassment and Discrimination Objectives: The Non-Supervisors with Title IX/Clery Module (1) identifies conduct that constitutes sexual harassment, including sexual assault, dating violence, domestic violence, and stalking, as defined by Title IX, as well as Title VII of the Civil Rights Act of 1964; (2) informs employees of their duty to promptly report instances of sexual harassment and other forms of protected characteristic discrimination or harassment to the university; (3) explains retaliation, provides examples of conduct that constitutes retaliation, and informs employees that retaliation is prohibited; (4) trains on prevention of abusive conduct, as required by applicable California state law; and (5) informs employees about applicable California state laws prohibiting harassment and discrimination based on gender, gender expression, sexual orientation, and gender identity.

Evidence of Completion

As of Dec. 15, 2022, completion rates for the *Preventing Harassment and Discrimination: Non-Supervisors with Title IX/Clery Module* were as follows: 90.0% for employees assigned the manager/supervisor version and 92.1% for employees assigned the non-manager/non-supervisor version. The slight deviation from a 100% completion rate is due to a variety of factors, including employees who were out on leave, employees who left the university after being assigned the

training, or student workers who ended their student employment after being assigned the training. This is visualized in the *Preventing Harassment and Discrimination: Non-Supervisors with Title IX/Clery Module* Completion Rates chart on [page 52](#).

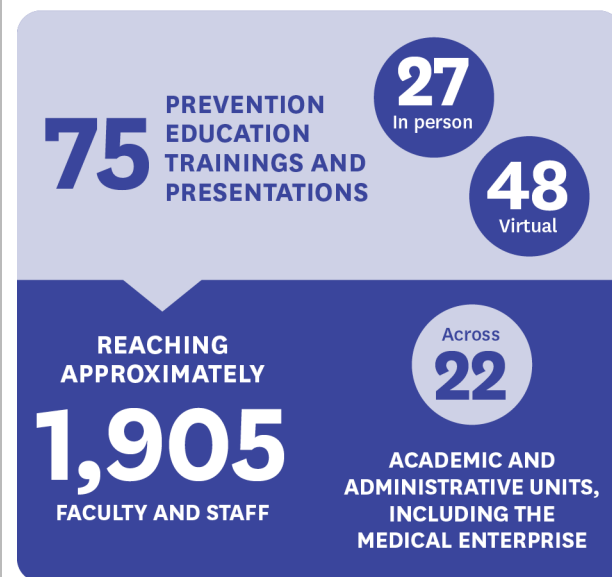
The positive feedback received through EEO-TIX's online form regarding the harassment prevention course for employees included that they found the material informative and important. The constructive feedback mostly related to employees reporting that it was taking them much longer than (and, in some instances, double) the required minimum time under California state law (i.e., one hour for non-supervisors and two hours for supervisors/managers) that it must take to complete this mandatory training. As a result of this community feedback, team members from EEO-TIX and TrojanLearn, USC's online learning platform, met with vendor representatives to make technical, non-substantive modifications to improve the user experience. Additional feedback included requests to provide more examples of religious discrimination and harassment. Based on this feedback, the university updated the customizable content of the training to include such examples.

Additional Prevention Resources

In addition to the mandatory training provided to all employees, EEO-TIX conducts in-person and virtual prevention education across the university. These programming sessions provide information about the university's

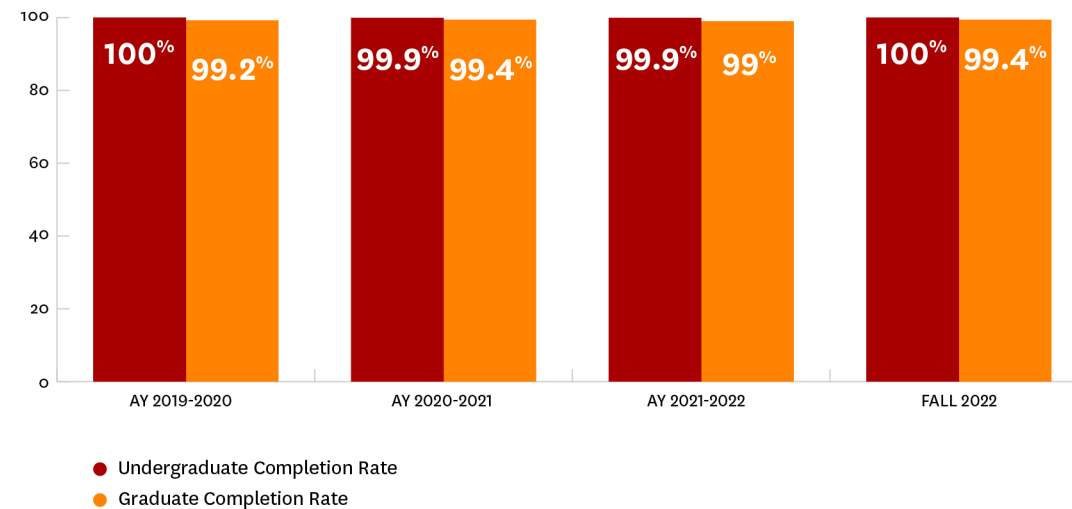
Policy on Prohibited Discrimination, Harassment, and Retaliation and related Resolution Processes; definitions and examples of prohibited conduct; employee rights and responsibilities under the Policy; Designated Employee reporting responsibilities; how to respond to disclosures of potential prohibited conduct, how to make a report, and available resources and supportive measures. They also can be tailored to the needs of a unit or department requesting the training/ education program.

During Academic Year 2021-2022, EEO-TIX provided:

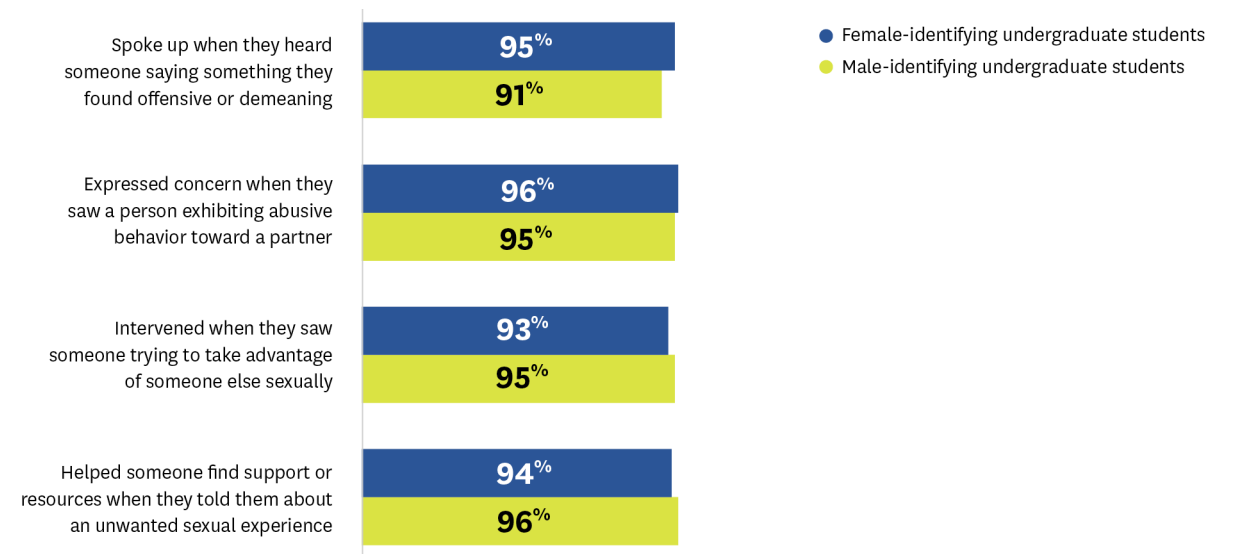


Prevention and Education Data on Completion and Effectiveness

Evidence of Completion: Sexual Assault Prevention Training Completion Rates



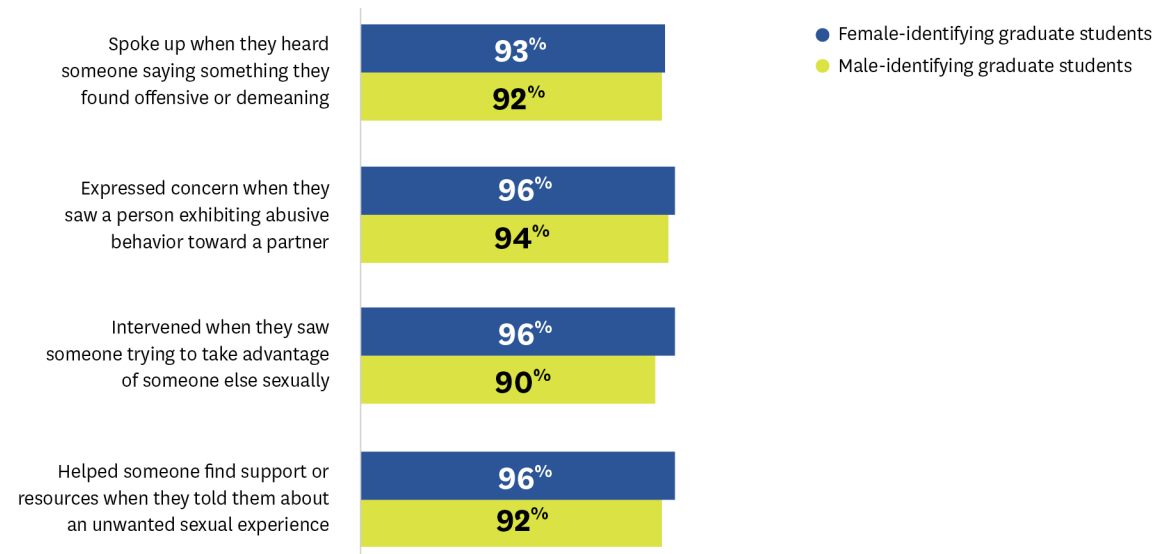
Evidence of Effectiveness: Sexual Assault Prevention Confidence — Undergraduates⁴⁰



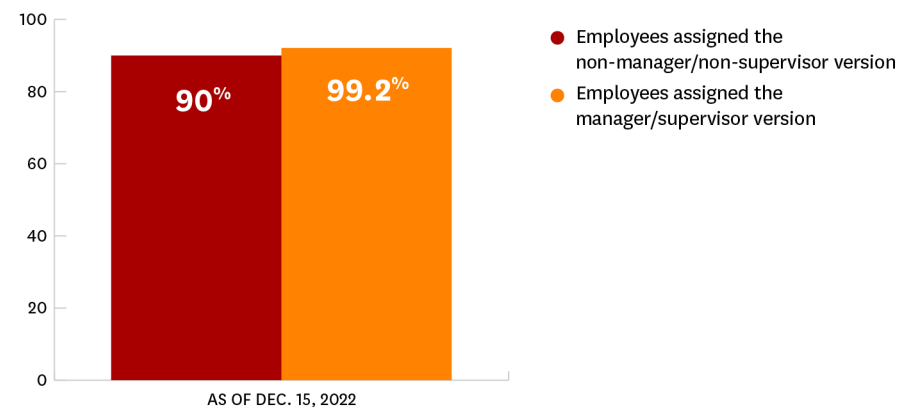
⁴⁰ As less than 2% of undergraduate and graduate students self-reported as nonbinary, that information is not depicted here for privacy reasons.

Prevention and Education Data on Completion and Effectiveness *Continued*

Evidence of Effectiveness: Sexual Assault Prevention Confidence — Graduate Students⁴¹



Evidence of Completion: Preventing Harassment and Discrimination: Non-Supervisors with Title IX/Clery Module Completion Rates



⁴¹ As less than 2% of undergraduate and graduate students self-reported as nonbinary, that information is not depicted here for privacy reasons.



Conclusion and Current Day Highlights

As presented in this report, the university has prioritized the needs of our community and building trust in the systems and processes put in place to respond to reports of discrimination, harassment, misconduct, and retaliation. All of the offices responsible for responding to concerns seek to do so with care, support, and respect.

Examples of our unwavering commitment during and beyond the period of this report – as supported by President Folt – include the university-wide [Culture Journey](#), the creation of the [Student Commitment](#), holistic work of the [Well-being Collective](#), development of the [Integrity and Accountability Code](#), and the rollout of the [Report & Response](#) website, and more. As we recognize the tremendous progress made, we also acknowledge that ongoing work remains.

To that end, the Vice President of EEO-TIX, the Title IX Coordinator, and other EEO-TIX staff and campus administrators review the available data to identify any trends or continuing areas for further development regularly each year. During the time period of the report, EEO-TIX received an increase in the number of reports of sexual misconduct, including sexual assault and dating violence, as well as reports of verbal harassment in the academic settings that potentially created a hostile environment.

In response to evolving data about trends and patterns, EEO-TIX regularly re-evaluates and adjusts educational and prevention programming to incorporate lessons learned. In collaboration with RSVP, the Office of Inclusion and Diversity, and other campus units, EEO-TIX enhances the effectiveness of its in-person and/or via Zoom trainings, tailoring them to include polls, role-playing, and case scenarios to engage audiences and improve learning outcomes.

As we look to the future, EEO-TIX and OPE will continue to provide coordinated responses that prioritize care for our university community. Through our prevention and education programming, university partners will help community members develop the knowledge and skills to identify potential prohibited conduct, intervene and respond when they witness such conduct, access reporting options, and connect with the appropriate resources for support. This continued investment in taking care of our community is essential to fostering an environment of inclusion and belonging at USC. ■

For more information about the EEO-TIX team or the Policy and Resolution Processes, please contact:

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APPENDIX 1

Efforts to Transform University Culture and Climate and Update on the U.S. Department of Education's Office for Civil Rights (OCR) Resolution Agreement

OVERVIEW OF OCR INVESTIGATION AND RESOLUTION AGREEMENT

In May 2018, the U.S. Department of Education's Office for Civil Rights (OCR) opened a directed investigation into the university's response to reports of potential sexual harassment by a former gynecologist in the Student Health Center. The university worked collaboratively with OCR throughout the investigation. At the conclusion of the 21-month investigation, OCR concluded that USC violated Title IX by failing to promptly and equitably respond to notices of nine complaints by patients of potential sexual harassment by former gynecologist George Tyndall between 2000 and 2016, which may have allowed patients to be subjected to sex discrimination. OCR also identified other systemic challenges that may have inhibited the university's response. In February 2020, the university signed a [Resolution Agreement](#) agreeing to strengthen its policies and processes for preventing and responding to sexual harassment to fully comply with Title IX of the Education Amendments of 1972.

In February and March 2020, the university shared the findings of the OCR directed investigation, documented in a Resolution Letter along with the Resolution Agreement, on the [Commitment to Change](#) webpage at [OCR 2020 Findings and Resolution Agreement](#). This webpage includes links to the following documents:

- [Letter from Senior Vice President of Human Resources Felicia A. Washington: Follow-up to OCR Resolution Letter and Agreement](#)
- [Summary of the OCR Resolution Letter and Agreement](#)

- [FAQs: U.S. Department of Education's Office for Civil Rights Investigation](#)
- [USC News Release](#)
- [U.S. Department of Education, Office for Civil Rights \(OCR\) Findings Letter](#)
- [U.S. Department of Education, Office for Civil Rights \(OCR\) fully executed Resolution Agreement](#)

Since May 2018, when the OCR investigation began, the university has worked to strengthen policies, procedures, and practices to promote patient well-being and prevent future misconduct; better integrate our Title IX protections into the healthcare setting; and reinforce a culture of care, responsibility, and accountability across all university programs and activities. The OCR investigation has helped to illuminate the many ways in which the university could improve its internal communication and recordkeeping to better track reports, provide heightened training to all community members, reinforce centralized reporting of all Title IX-related concerns, and deepen the collaboration between its health care system and its Title IX program.

The required actions under the Resolution Agreement include:

- Reinforcing the independence and authority of the newly-created Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) and ensuring appropriate resources and support to allow it to function effectively to serve all students, faculty, and staff;
- Appointing a Deputy EEO-Title IX Coordinator

for Healthcare and designating Health Care Title IX Investigators to ensure (1) that Title IX support systems are visible and accessible to patients, students, and employees, and (2) that investigations are conducted by individuals with expertise in the unique issues that can arise in the healthcare setting;

- Maintaining accurate and complete data recordkeeping to more quickly address sexual and gender-based harassment and violence through university-wide improvements in personnel evaluations and documentation practices, as well as improved data management within EEO-TIX;
- Directing all supervisory employees to review current files and ensure that all known misconduct has been reported to EEO-TIX;
- Conducting a self-audit of all reported cases of sexual harassment or violence at the end of each academic semester;
- Conducting a self-assessment of the actions of current and former employees who had supervisory responsibilities over Tyndall were (a) reported to have received notice of complaints related to Tyndall or (b) were responsible for implementing Title IX in response to those complaints;
- Making modest revisions to written policies in effect at the time to address concerns identified by OCR;⁴²
- Continuing and augmenting training programs on sexual harassment for all employees and students, with a heightened focus on employees in USC Student Health Center and issues related to harassment in the context of receipt of health care services;
- Continuing to understand and assess culture and climate in the healthcare setting; and

- Communicating with impacted community members regarding individual remedies.

Fulfilling Resolution Agreement Action Items

During OCR’s monitoring of the university’s implementation of the Resolution Agreement, the university has continued to work collaboratively with OCR, producing data and information to OCR as required under the [Resolution Agreement](#).

To date, the university has timely fulfilled required action steps, including:

- Providing OCR with detailed documentation regarding the creation of the EEO-TIX office and enhanced data and tracking systems and processes;
- Updating, posting, and disseminating a revised Notice of Non-Discrimination;
- Creating, posting, and disseminating the Policy on Prohibited Discrimination, Harassment, and Retaliation, Resolution Process for Sexual Misconduct, and Resolution Process for Discrimination, Harassment, and Retaliation;
- Implementing and documenting steps taken to address impacts of former USC employee Tyndall’s actions on USC climate and access to programs;
- Notifying former and current students about the availability of individual remedies;
- Sharing spreadsheets of pending and closed reports of sexual harassment or sexual violence for three years (nine academic terms throughout 2020, 2021, and 2022) with OCR;
- Communicating with identified former patients regarding the availability of individual remedies;

⁴² In August 2020, following the release of new Title IX regulations, the university consolidated all existing policies addressing discrimination, harassment, and retaliation on the basis of protected characteristics involving faculty, staff, and students. In addition to compliance with the new regulations, the goal was to provide a university-wide, simplified policy framework that would be more accessible, user-friendly, and consistent across all constituencies.

- Providing comprehensive information about the university’s educational programs and initiatives to promote awareness and prevention of campus sexual violence;
- Conducting a supervisor file review; disseminating a Centralized Reporting Directive;

- Expanding prevention and education programming for students; and
- Sharing multiple additional documents for OCR’s review and approval.

OVERVIEW OF CIVIL LITIGATION

Federal Class Action & Equitable Relief Provisions re: Tyndall

In February 2020, the university entered a \$215 million federal class action settlement, which resolved the claims of more than 16,000 women who were treated by Tyndall at the USC Student Health Center. The settlement included a robust set of Equitable Relief provisions that were agreed upon by the plaintiffs and the university and were designed to enhance USC Student Health Center policies and protocols.

The following Equitable Relief provisions are completed:

- Appointment of an independent women’s health advocate
- Pre-hiring background checks of all new personnel, including physicians, who are regularly expected to have direct patient interaction
- Pre-hiring screening of all new personnel for former complaints of sexual harassment and/or gender-based violence or discipline related to patient interaction or patient safety
- Annual verification of credentials of all clinic personnel, including physicians
- Annual education and performance reviews concerning identifying, reporting, and preventing improper sexual and/or racial conduct

- Biannual training on safety and risk management reporting for all USC Student Health employees
- Consultation with experts to implement comprehensive patient education materials about sensitive examinations and revision of the sensitive exam policy to reflect the best practices of the American College Health Association (refer to [A Patient Guide to Sensitive Health Exams](#))
- Employed more female, board-certified physicians to allow choice of gender in selecting a physician
- Distribution to all students accessing USC Student Health information regarding the settlement and brochure with patient education information
- Annual training of all USC Student Health personnel who will assist with Sensitive Exams
- Distribution to all students accessing USC Student Health of plain-language notice of how to recognize and report sexual harassment and gender-based violence by a healthcare provider
- Expansion of information in consent for treatment forms
- Student representation on the USC Student Health Trauma-Informed Care Committee

- Student engagement as Community Health Organizers
- Created new and easily accessible methods for collecting information about potential misconduct, including soliciting patient feedback ([online link](#) for questions, concerns, and complaints on the university’s [Patient Feedback](#))
- Expanded the services of the RSVP program to include 10 additional full-time employees
- Appointment of an Independent Task Force Member to serve on the AAU Survey Task Force for the 2019 AAU Campus Climate Survey on Sexual Assault and Misconduct.

State Court Plaintiffs and Individual Relief re: Tyndall

In March 2021, the university and 710 women who filed civil cases in Los Angeles Superior Court involving Tyndall reached a global agreement, which provided \$852 million to individuals impacted by Tyndall. The university also provided supportive measures and individual remedies to individuals who contacted EEO-TIX, including connection to counseling (at no cost), academic accommodations, and transcript modifications.

OVERVIEW OF ACTIONS TAKEN

From May 2018 to present, USC has engaged in multi-disciplinary and university-wide efforts to transform its Human Resources, Compliance, and Title IX and related civil rights programs, incorporate lessons learned, and drive change through [commitment](#) to care, culture, and compliance, focusing on [Unifying Values](#) and the behaviors that support our values. Despite the practical and fiscal challenges that have resulted from the uncertainties of the COVID-19 pandemic, the university has remained steadfast in its efforts to transform campus culture to prioritize Integrity; Excellence; Diversity, Equity, and Inclusion, Well-being, Open Communication, and Accountability. The university’s efforts to rebuild trust and live its institutional mission are also chronicled on the [Continuous Efforts to Enhance University Responses](#) webpage.

These efforts have fallen into several core initiatives:

- **Administrative actions**, including creating new personnel positions dedicated to Title IX and support of university students,

expanding existing staffing levels in key resources, and creating additional resources to support student and employee welfare

- **Pan-institutional task forces and response teams** to address issues related to sexual and gender-based harassment and violence
- **Education and programming** to reinforce the university’s commitment to Title IX, restore trust in the university’s Title IX policies and processes, and reinforce the availability of resources and reporting options
- **Participation in the Association of American Universities Climate Survey** to capture data on the incidence and prevalence of sexual harassment and gender-based violence on USC campuses and assess students’ perceptions related to campus resources, bystander, and reporting behaviors
- **Enhancements to USC Student Health Center** regarding policies, protocols, training, and information-sharing regarding sensitive examinations
- **Targeted efforts to address and remedy**

the perceived impacts of Tyndall’s conduct through the Equitable Relief provisions of the class action litigation

- **A university-wide Culture Journey** to explore common values, align the supportive behaviors that bring those values to life and develop opportunities to improve systems, processes, and culture
- **Continued mechanisms and forums** to seek input from university community members.

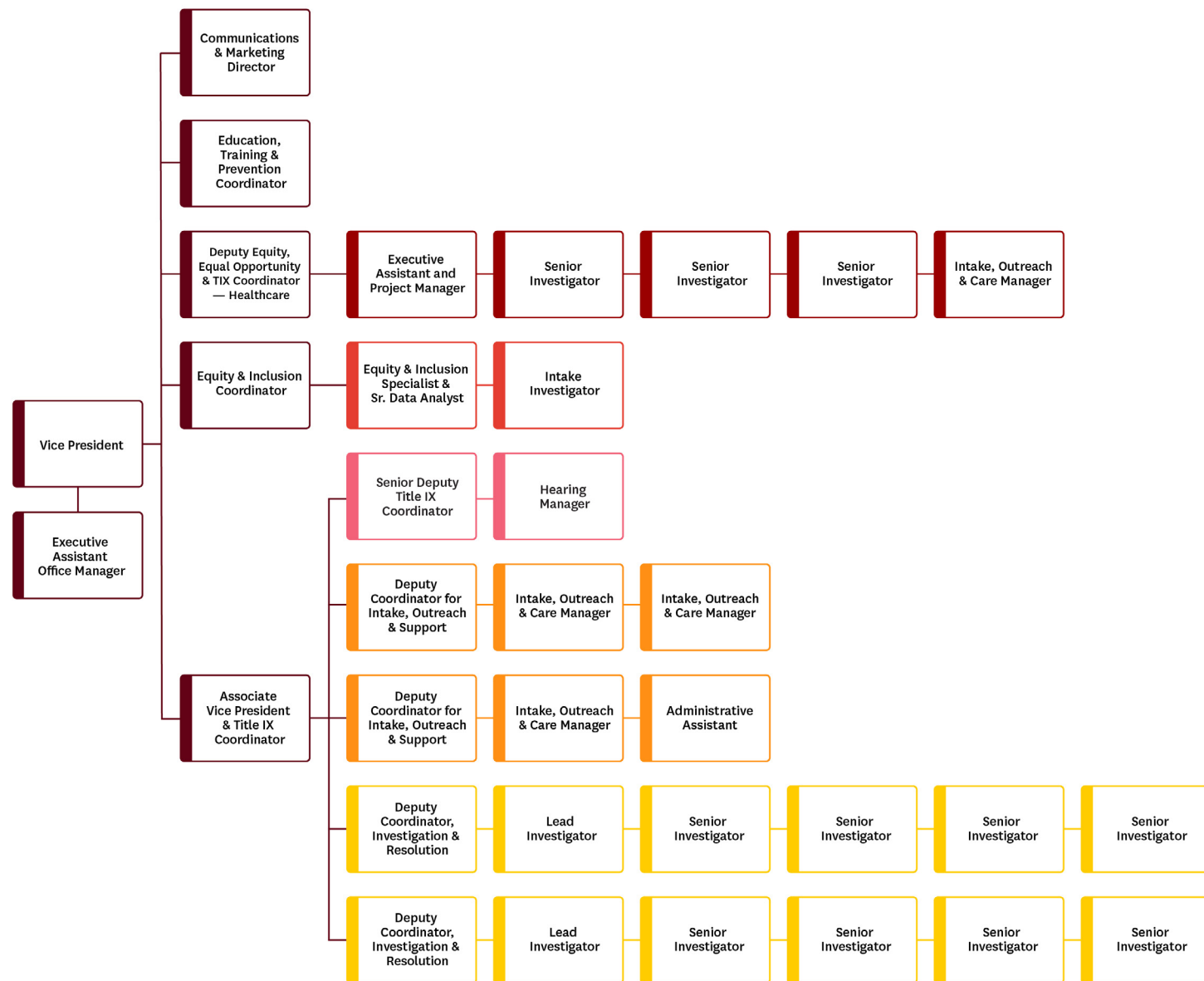
Title IX Program

In August 2020, the university launched the [Office for Equity, Equal Opportunity, and Title IX](#) (EEO-TIX), a centralized equity and civil rights office that provides consistent and equitable access to supportive measures and informal and formal resolution options. In addition, the university implemented a university-wide [Policy on Prohibited Discrimination, Harassment, and Retaliation, Resolution Process for Sexual Misconduct, and Resolution Process for Discrimination, Harassment, and Retaliation](#) that apply to all students, staff, and faculty. Key accomplishments included hiring a first-ever [Vice President of Equity, Equal Opportunity, and Title IX](#), an Associate Vice President (who also now serves as the Title IX Coordinator), as well as a [Deputy EEO-Title IX Coordinator for Health Care](#); expanding staff and resources within the new EEO-TIX office (including creating an Intake, Outreach, and Support Team and hiring a Communications and Marketing Director and a dedicated Education, Training, and Prevention Coordinator); strengthening internal protocols and improving document management systems within EEO-TIX; and training EEO-TIX investigators, decision-makers, appellate authorities, and implementers on the final

Title IX regulations, released by the Office for Civil Rights in May 2020 (effective Aug. 14, 2020), as well as effective investigative techniques, including trauma-informed and anti-bias training, that reflect best practice in the field.

EEO-TIX’s Intake, Outreach, and Support Team represents an innovative approach in the field. This team is separate and distinct from the EEO-TIX Investigation and Resolution Team, which is responsible for implementing the Formal and Resolution processes and is designed to prioritize the care and well-being of university community members. For example, if EEO-TIX initiates a formal resolution, both reporting parties and respondents are assigned a dedicated EEO-TIX Care Manager, whose primary role is to check in with them at critical junctures throughout the process and beyond to ensure they are receiving the support resources that they may need — this is in recognition that these processes are difficult and can often take a long time, and that the needs of the parties may evolve over time.

EEO-TIX Organizational Chart (as of April 2024)



In conjunction with the new office, the university launched a publicly available [EEO-TIX website](#) as a resource available to the community. The website provides the following information:

- the mission of the office, as well as contact information for the Vice President of EEO-TIX, Associate Vice President and Title IX Coordinator, and the Deputy EEO-TIX Coordinator for Healthcare;
- a Get Help webpage that provides information relating to confidential and private support resources, healthcare-related concerns, information about choices, and an [FAQ on Student Supportive Measures](#);
- access to the Policy and Resolution Processes and Notice of Non-Discrimination Statement, with accompanying FAQs, employee reporting requirements, and an infographic overview of the investigation processes;
- access to affirmative action and employment equity information;
- a training and other resources webpage, including links to training provided to EEO-TIX staff and anyone who assists with implementing the resolution processes, information about USC’s membership in the NASEM Action Collaborative on Preventing Sexual Harassment in higher education, and sample syllabus language;
- an [About Us](#) page, which links to staff bios and provides photographs of each EEO-TIX team member; and
- a [What are My Choices](#) tab.

The bottom of the main page provides a link to a portal for community feedback on the Policy and the office, information on how to

report concerns anonymously through [Report & Response](#), as well as posts covering recent news and announcements. An accessible option to quickly exit the site constantly exists.

USC Student Health

During 2021-2022, USC Student Health was fully integrated into [Keck Medicine of USC \(Keck Medicine\)](#). Together, these entities provide professional and management services to USC Student Health. As part of this integration, all health care providers are designated as faculty within the academic medical departments or staff within USC Care, which mandates a rigorous credentialing process, and as of 2017, all clinical services at USC Student Health have been staffed and managed by Keck Medicine.

All USC Student Health healthcare providers are subject to the direct oversight of the Medical Group’s Clinical Practice Committee. The Clinical Practice Committee oversees all matters related to credentialing, peer review, compliance with accreditation standards set forth by the Accreditation Association for Ambulatory Health Care, clinical policies and procedures, risk management, and patient safety and satisfaction.

USC Student Health has offered diversity in available physicians by/through:

- hiring two female, board-certified gynecologists to oversee women’s health care services;
- increasing educational outreach to students on patient rights and responsibilities;
- providing brochures and videos on what to expect in sensitive exams such as pelvic exams and pap smears;

- expanding the services of the RSVP program to include confidential victim advocates as well as prevention and education staff to provide specialized services for survivors of sexual assault, reduce interpersonal violence, and collaborate with other campus entities to promote a culture of consent and healthy relationships;
- shifting all hiring and credentialing to Keck Medicine;
- ensuring that all complaints about physicians are entered into the safety and risk management system and reviewed by the Integrated Risk Management Office of Keck Medicine, which includes physician leaders and, in some, the peer review process;
- continuing extensive training for USC Student Health staff on complaint reporting; and
- adding Chinese-speaking staff for greater support of Chinese-speaking students, in addition to translation and interpreter services the university otherwise would provide for any language diversity issue, as needed.

In 2019, the university adopted trauma-informed principles throughout USC Student Health. To better implement training and shifts in practices, USC Student Health formed a Trauma-Informed Care Steering Committee to shepherd the organizational transformation. The Steering Committee includes designated members of executive leadership teams and department heads or their designees. To facilitate the consistent application of the Trauma-Informed Care principles, all staff in USC Student Health attended an in-person training and completed online video and reading requirements. Training will occur on a bi-annual basis to ensure the sustainability of this targeted effort.

Clery Act Compliance Program

Consistent with the university’s focus on safety, accountability, and open communication, the university has also invested in expanding its Clery Act Compliance Program and its coordination of responses covering all Clery Act crimes. In particular, the university has prioritized the coordination of Title IX and Clery Act responses to reports of sexual assault, dating violence, domestic violence, and stalking. In November 2020, the university moved responsibility for the Clery Act compliance program under the oversight of the OCEC, which has allowed for focused attention, enhanced administrative oversight, and a greater ability to effect systemic improvements that align with the university’s initiatives to strengthen Title IX and Human Resource’s policies and processes. To oversee the Clery Act Compliance Program, the university created a new, elevated position, Assistant Vice President for Clery Compliance and Youth Protection, that coordinates and leads two key campus safety responsibilities at the university-wide level. The university has also focused on staffing within the Clery Compliance Office, onboarding a new Clery Compliance Coordinator in September 2021. Additionally, the university implemented a Clery Act Executive Oversight Group, which meets bimonthly with the Clery Compliance team for program status updates and to provide strategic direction to the Clery Compliance team. Members of the Oversight Group include the Senior Vice President of Human Resources, Equity, and Compliance; Senior Vice President of Administration; Senior Vice President and General Counsel; Vice President for Student Life; and Senior Vice President of Communications.

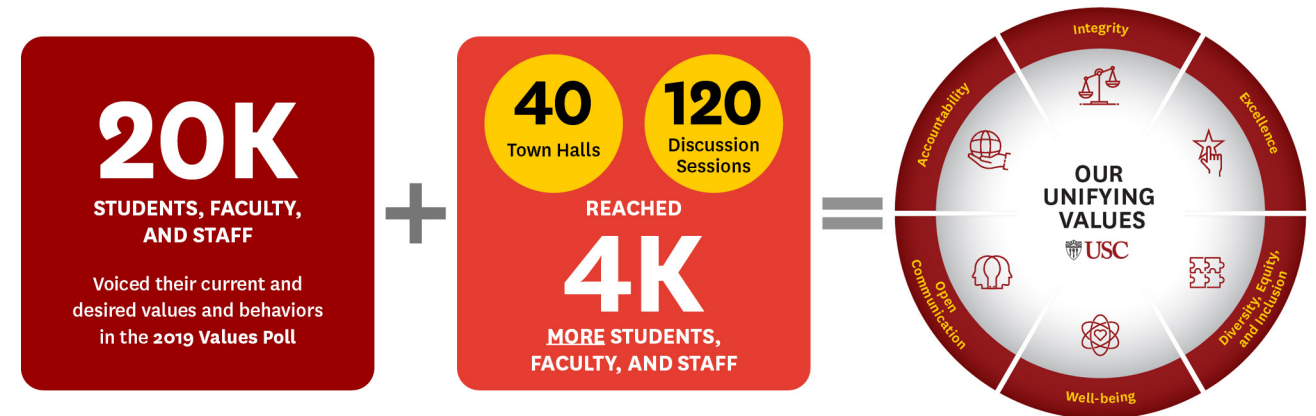
Under the leadership of the Associate Vice President for Clery Compliance, the university has developed and implemented a program improvement plan to develop strategic and sustainable enhancements to the Clery Act compliance program. The university has also established a pan-institutional Clery Compliance Interdisciplinary Review Team (IRT) to provide enhanced oversight of the Clery Act Compliance program. The IRT has already developed a fulsome Clery Act Compliance Policy and a Policy & Procedure for Issuance of University Alerts. All these enhancements were designed to promote awareness and safety for our students, faculty, and staff.

In addition to oversight and policy development, the university has developed and implemented enhanced incident review procedures. The Clery Compliance Office and trained university partners (including EEO-TIX, DPS, and OPE) assess new reports in real-time for Clery Act classification and notification decisions. Along with immediate analysis of Clery Act offenses, a regular and ongoing data reconciliation team has been established to review and reconcile arrests, referrals, and violations monthly.

These efforts are enhanced with expanded training for university stakeholders, including DPS personnel, members of the IRT, and key stakeholders, including USC Student Health, Athletics, deans and leaders of individual schools and colleges, Residential Education, SJACS, Keck Integrated Risk Management on the Health Sciences Campus (HSC), and other HSC leadership.

Culture Journey

Over the past four years, the university has successfully developed and executed a campus-wide culture change initiative in collaboration with stakeholders at all levels. This multiphase process involved defining the university’s core values, aligning key stakeholders around culture initiatives, and implementing sustainable culture change within their systems and processes.



In 2019, a Values Poll, capturing community feedback from 20,000 individuals, was conducted for students, faculty, and staff to voice current and desired values and behaviors. The poll results were shared through more than 40 town halls that were hosted to engage the community. Furthermore, more than 120 discussion sessions occurred to gather additional feedback and hone the results — reaching over 4,000 additional faculty, staff, and students. The final product was six Unifying Values to develop Trojans through the cultivation and enrichment of the human mind and spirit: Integrity; Excellence; Diversity, Equity, and Inclusion, Well-being, Open Communication, and Accountability.

Culture Journey Network

Part of the Culture Journey's success is due to the Advisory Bodies, which are representative groups established to support and advocate for the USC Culture Journey. They include a Working Group on University Culture, comprised of faculty and staff from across the university who act as a sounding board and provide direction for activities related to Culture, and a Culture Council that advises the Culture Journey on strategic recommendations and tackles emergent issues.

Another critical component of the USC Culture Journey is the Culture Network. It involves individuals at various levels helping to prepare the community for change and who serve as culture champions. Members benefit from professional development opportunities, and they have a direct impact on the culture by building awareness and supporting various Culture Activities. Culture Network members facilitated over 200 town halls and discussion sessions and are currently engaged in delivering Values Check-in sessions within Schools and Units. As of December 2021, there are 120 Culture Network members.

Culture Journey Network Expansion

Culture Network members are seeing an increase in engagement, with 30 members receiving facilitation training on the Values Check-in sessions and 29 members readily volunteering to facilitate sessions for the upcoming Inclusive Learning Environments focus groups. There is heightened engagement among the Partners for Culture Change, a group committed to receiving updates on the Culture Journey. The Partner intake process was incorporated into New Employee Orientation, and as a result, 146 Trojans joined as Partners, increasing our membership to 650. The Partners for Change are invited to sessions where culture change efforts are highlighted and where they are updated on the roll-out of tools for our community in the form of toolkits and other materials to support local discussions on values and desired behaviors.

USC's focus on culture is designed to support the execution of the mission by aligning on what we do and how we do it. At present, the Culture Journey prioritizes aligning values, behaviors, systems, and processes across five focus areas — Values, Development, Well-being, DEI, and Concerns. The focus areas were developed based on community feedback, and each has its own distinctive set of initiatives and programs, in addition to being led by a member of USC's leadership.

The Culture Journey is shaped by the community, inclusive to all, and modeled by leadership. With several more initiatives being launched in the coming months, there is great momentum as the university embarks on the next phase of the Culture Journey.

The Culture Journey issued a [summary report in December of 2022](#) to update the community on progress, challenges, and planned future actions.

AAU Sexual Assault Climate Survey

In Spring 2019, the university participated in the AAU Campus Climate Survey on Sexual Assault and Misconduct. The survey design captures data on the incidence and prevalence of sexual harassment and gender-based violence on USC campuses. It also assesses students' perceptions related to bystander and reporting behaviors and campus resources. The main goals of the survey were to: estimate the prevalence of sexual assault and other misconduct, particularly sexual harassing behaviors; describe the circumstances, students' survey responses, and consequences associated with instances of sexual assault and other misconduct; assess student knowledge of school resources and procedures when responding to instances of sexual assault and other misconduct; and assess how bystanders react in different situations related to sexual assault and other misconduct. The AAU survey included questions to measure and assess student demographics; campus connection and well-being climates; perceptions of risk; knowledge of campus resources; personal experience of sexual assault; sexual harassing behaviors, stalking, and intimate partner violence; opinions on USC programs and services and prevention education; perceptions of USC responses to their reporting; and bystander behavior.

In July 2019, the university created a Sexual Assault Climate Survey Task Force (AAU Survey Task Force) to review the AAU Survey findings; review its validity and reliability; develop specific recommendations for campus policy, practices, and services based on findings; develop a comprehensive communications plan for sharing the survey results; and make recommendations for future program evaluation and research.

Beginning in October 2019, the AAU Survey Task Force offered a variety of forums to socialize the campus community to the results

of the AAU survey. Those forums included town halls, focus groups to reach disproportionately affected student populations, and AAU Data Walks — a participatory way to share relevant data with affected communities. Following the closing of the campus due to the COVID-19 pandemic, scheduled in-person events were canceled; however, alternative forums were developed to share key findings and solicit student feedback. These included virtual focus groups (hosted by student Community Health Organizers), a Virtual AAU Student Engagement Survey, and the creation of a virtual Data Walk. These in-person and virtual sessions also provided students in academic and cultural communities an opportunity to better understand the data and its implications while sharing their own experiences related to sexual assault and misconduct on campus. Together, the engagement yielded participation by over 500 students and provided diverse forums for robust discussion and feedback.

In October 2020, the AAU Survey Task Force [released](#) the final [AAU Survey Task Force Report](#). Relating to prevention, the AAU Survey Task Force recommended that the university create a Campus Coordinating Response Team (CCRT) charged with developing, implementing, and overseeing various methods for comprehensive sexual harassment and assault prevention. Additional recommendations included (1) further develop and promote campus comprehensive prevention resources; (2) provide comprehensive prevention-oriented training for all students, faculty, and staff throughout their time at USC; (3) evaluate and expand methods to increase reporting; (4) increase accountability for incidents of sexual harassment perpetrated by faculty and staff; (5) collect additional data; (6) increase education regarding sexual harassment; (7) continue university efforts to decrease alcohol consumption.

Campus Coordinating Response Team (CCRT)

In February 2020, RSVP formed the USC Campus Coordinating Response Team (CCRT) to oversee the development and implementation of policies, prevention initiatives/efforts, and responses to address sexual and gender-based harassment and violence, with a tailored and particular focus on the LGBTQ+ student cohort. Beginning in the Spring of 2020, the CCRT has been meeting monthly to develop its charter and organizational structure. The CCRT includes approximately 20 members from campus partners — including Residential Education, the Office for Student Accessibility Services, Student Life, Department of Public Safety, USC Student Health, Student Activities, Undergraduate and Graduate Student Government, the Office of International Students, LGBT Resource Center, EEO-TIX, and Student Cultural Affairs — in addition to local partners from the surrounding Los Angeles area. These local partners include the YWCA of Greater Los Angeles; St. John Child & Family Wellness Health Center; Los Angeles County DV Committee, the LGBTQ+ subcommittee; Long Beach LGBT Center, Advocacy Program; the Jenesse Center; Los Angeles Police Department; LA County District Attorney, Victim Services; ValorUS; and the UCLA Santa Monica Rape Treatment Center.

Dr. Sarah Van Orman, Chief Campus Health Officer and Vice President for Campus Health, and Catherine Spear, former Vice President of EEO-TIX co-sponsored the CCRT. Today, Dr. Van Orman and Linda Hoos sponsor the CCRT. The co-chairs are Dr. Deborah Schleicher, RSVP Director, and Dr. Mellissa Withers, Associate Professor of Preventive Medicine in the Keck School of Medicine.

The initial goals for the CCRT included:

- Developing, implementing, reviewing,

and revising programs and procedures to effectively respond to gender-based harassment and discrimination, including sexual assault, domestic/intimate partner violence, dating violence, and stalking

- Promoting prevention and intervention efforts that are appropriate, research-informed, culturally relevant, and inclusive of historically marginalized or underserved groups
- Assessing USC’s campus climate regarding gender-based harassment, discrimination, and violence
- Evaluating current strategies and programs aimed at preventing and responding to gender-based harassment, discrimination, and violence
- Developing and overseeing a communications strategy to engage USC students, faculty, and staff in prevention and response efforts

In addition to specific guidance about the structure and format of the CCRT, the AAU Survey Task Force recommended that the CCRT’s first charge include leading and coordinating implementation of the recommendations in the AAU Survey Task Force Report.

Key accomplishments of the CCRT include:

- Creation of a full-time advocate dedicated to providing the LGBTQ+ student community with culturally relevant services. RSVP applied for and received a grant for this position. The new full-time advocate works closely with RSVP’s violence prevention team to develop prevention and outreach approaches and materials; the goal is to train USC’s entire Department of Public Safety in culturally appropriate and trauma-informed practices when responding to students who have been impacted by sexual and relationship violence. The grant supports

the further development of the CCRT, with a focus on the LGBTQ+ student cohort, and assists USC in developing more specialized approaches for other student cohorts that have high rates of sexual victimization.

- Continued support of campus-wide prevention and education programs. RSVP offers the USC community a series of prevention workshops on affirmative consent, healthy relationships, bystander intervention, and sexual harassment. These workshops are required for all students. All incoming students start with the affirmative consent workshop. In their second year, they take the healthy relationship workshop, and take the bystander intervention workshop in their third year. Moreover, all graduate and professional students are required to take a workshop on sexual harassment. All of these workshops are inclusive of all student social identities, sexual orientations, and gender identities. RSVP also has started bystander intervention workshops for faculty and staff using a Train-the-Trainer model for the sustainability of bystander intervention skills. This training has been tailored as well for various student cohorts, such as athletes, marching band, student registered organizations, Greek life, etc. For USC’s undergraduate students, sexual harassment is included in their bystander intervention workshops, which focus more on harassment by peers than harassment in professional or working environments – which tend to impact our graduate students more. Based on research, we strongly believe that bystander intervention training is key to changing the culture on campus and holding the campus community accountable for addressing all harassing and violent behaviors.
- The CCRT developed a [LGBTQ+ Inclusive Classroom Guide](#), a guidebook for faculty to create a more inclusive environment in educational settings. This guide includes information on issues of discrimination

and bias regarding students who identify as LGBTQ+. During March 2022, this toolkit was widely disseminated in a campus-wide email, was included as a resource in the Center for Excellence in Teaching, and shared with academic programs and departments, including Student Life, Student Health, and others to educate on reinforcing their business and educational practices to be more inclusive of this student cohort. The educational toolkit provides historical context, explains the traumatic impacts of bias, includes steps and tips to recognize and change biased behaviors, and a directory of campus and community resources.

KEY CAMPUS PARTNERSHIPS

The university’s commitment to fostering an environment free from discrimination and harassment is a collective commitment shared by students, faculty, and staff. We are proud to highlight the partnerships across campus that work toward our Unifying Values.

Policy and Advisory Committee (PCAC)

In the summer of 2020, following the May 2020 release of the final Title IX regulations, the university convened a Policy and Community Advisory Committee (PCAC) to assist the university in ensuring that it carefully considers the interests, perspectives, and impacts that changes in policies, procedures, practices, and systems might have on its many diverse schools and units. The PCAC, comprising faculty, staff, and undergraduate and graduate students, serves as an important voice in the university’s efforts to improve systems, processes, and culture; better care for its people; and promote accountability and responsibility in keeping with its institutional values. The PCAC includes the presidents of the Academic Senate and Staff Assembly, representatives from Graduate and Undergraduate Student Government, the Vice President of EEO-TIX, and faculty

and staff at schools and departments across the university. While the charge of the PCAC encompasses all issues related to people, culture, and accountability, one of the first issues PCAC considered was the development of a revised Title IX policy that incorporates the required policy actions under the OCR Resolution Agreement and the final 2020 Title IX regulations. PCAC has also reviewed the university's Clery Act Policy. The PCAC has been meeting since June 2020 to engage in dialogue about Title IX, and the impacts of both the 2020 Title IX regulations (and the proposed changes to the Title IX regulations anticipated in May 2023) for university stakeholders and constituents. PCAC is an ongoing committee that will continue to provide a forum for community dialogue and engagement.

National Academies of Sciences, Engineering, and Medicine's (NASEM) Action Collaborative on Preventing Sexual Harassment in Higher Education

On April 20, 2019, the university [joined](#) the National Academies of Sciences, Engineering, and Medicine (NASEM) when it launched a national [Action Collaborative](#) on Preventing Sexual Harassment, comprised of peer institutions of higher education. The university is one of the founding universities in the NASEM Action Collaborative, which includes four goals: raise awareness, elevate evidence-based institutional policies, gather and apply research, and develop a standard for measuring progress to reduce and prevent sexual harassment in higher education. These goals reflect the university's ongoing mission to continue to lead the university into the future with civility and mutual respect. To facilitate the commitment to these goals, the university formed a working group initially composed of fifteen staff and faculty members. This working group's efforts are built upon the foundation established by the OCAP Joint Committee.

As a founding NASEM Action Collaborative member, the university publicly [committed](#) to developing new approaches to address sexual harassment from a preventive orientation; implementing and testing new or revised programs, policies, and practices each year; sharing the results from these new or revised approaches each year; and identifying and engaging a group of additional individuals at the institution who can assist and inform this work (including experts, researchers, key stakeholders, and individuals with job responsibilities related to issues of sexual harassment).

On Jan. 17, 2020, the university hosted a retreat entitled *A Conversation about Sexual Harassment: Prevention, Response, Remediation, and Evaluation*. The retreat was designed to inform a larger audience of the NASEM report and the university's involvement as a founding member of the Action Collaborative; to share innovative ways schools are already engaging in addressing and preventing sexual harassment; to brainstorm around the themes of the four NASEM Action Collaborative working groups; to clarify the roles of central offices and resources; and to map the next steps as a university, including possible development of an organizational structure specifically directed towards Gender Equity and related issues. The retreat included student, faculty, and staff representatives from each school; deans; and key organizational units involved in addressing and preventing sexual harassment on campus.

The university's NASEM Action Collaborative on Sexual Harassment working group has continued since 2019, meeting periodically to discuss annual priorities, highlight the intersection of university initiatives, and find innovative ways to engage the broader community on issues around the prevention

of sexual and gender-based harassment. The working group is currently co-chaired by Linda Hoos, Vice President for EEO-TIX, and Dr. Maria G. Maldonado, Clinical Assistant Professor of Family Medicine at the university's Keck School of Medicine, Director, Pathways Program, and Director for the Center for Gender Equity in Medicine & Sciences (GEMS). Children's Hospital of Los Angeles (CHLA) also is a member of the NASEM Action Collaborative, and a CHLA representative is an active member of the university's working group. USC has committed to another four-year membership term starting with the 2023-2024 academic year.

Center for Gender Equity in Medicine & Science (GEMS)

The [Center for Gender Equity in Medicine & Science \(GEMS\)](#) was established in 2019 at Keck School of Medicine (KSOM) and, as noted previously, is currently led by Dr. Maldonado and formerly led by Dr. Parveen Parmar, Chief of the Division of Global Emergency Medicine at KSOM. Its mission is to achieve a climate of gender equity and safety for all at the KSOM, working in close collaboration with diversity, equity, and inclusion initiatives across the KSOM and the university while using an intersectional approach. GEMS seeks to:

- Establish processes and practices to achieve gender equity in recruitment, faculty development, and across the career pipeline
- Achieve and sustain equal pay regardless of gender and as provided by law
- Achieve and sustain equitable representation in leadership for all, regardless of gender
- Create and sustain a culture that supports diversity, psychological safety, and belonging for all and is intolerant of sexual harassment and gender discrimination

- Serve as a body to ensure transparency and data-informed approaches meet these goals

The establishment of the Center for GEMS provides a clear path forward to effect culture transformation that goes beyond mere compliance and supports a culture that promotes integrity, respect, and diversity.

GEMS includes three working groups: Leadership Development, Equity & Representation, and Sexual Harassment. Working group priorities for fiscal year 2022 include: offering an upstander intervention Train-the-Trainer program in collaboration with RSVP; offering gender, sexual orientation, and LGBTQ+ trainings in collaboration with Keck PRIDE; seeking transparency in compensation and salary equity at KSOM; supporting and advocating for equitable hiring practices and search committees; and expanding efforts to provide effective and meaningful implicit bias training to KSOM faculty and staff. GEMS currently offers free live trainings for departments and units on implicit bias and LGBTQ+ Health. GEMS has also created Inclusion Resource Groups (IRGs) in collaboration with the JEDI-WeST (Justice through Equity, Diversity, Inclusion, Well-being, and Social Transformation) Committee. The mission of the IRG Program is to foster and advocate for an inclusive campus community that celebrates diversity and intentionally contributes to a sense of belonging and being valued. The program has five IRGs for the following groups: Black & African American Community; LatinX & Hispanic Community; LGBTQ+ Community; Women; and Mental Health & Neurodiversity. ■

APPENDIX 2

Overview of Confidential Support Resources

USC STUDENT HEALTH, MEDICAL SERVICES

USC Student Health, Medical Services provides primary care and specialty care services such as gynecology, dermatology, allergy, orthopedics, physical therapy, occupational therapy, and nutrition services. Primary care appointments can be scheduled for acute and chronic medical concerns, sick and injury care, physical exams, preventative care, transgender health, and sexual and reproductive health care, including: STI testing; pre-exposure prophylaxis (PrEP) and post-exposure (PEP) prescription; birth control prescription, consultation,

and insertion/removal of long-acting reversible contraceptives (LARC devices); and a full range of reproductive health care consultation services. All providers are faculty or staff within their respective academic departments and fully credentialed within these areas with primary clinical oversight from the Department of Family Medicine.

Visits are available via TeleHealth and In-Person: Log in at [My Student Health Record \(MySHR\)](#) to view available appointment times or call 213-740-9355 (WELL) for assistance.

USC STUDENT HEALTH, COUNSELING, AND MENTAL HEALTH SERVICES (INCLUDING BIPOC MENTAL HEALTH)

All providers of USC Student Health Counseling and Mental Health Services are clinical faculty of the Department of Psychiatry and the Behavioral Sciences, Keck School of Medicine of USC. Counseling and Mental Health programs include individual therapy, group therapy, crisis support, psychiatric services, and specialties for gender-based harm. CMH has undergone significant expansion, growing from approximately 25 to 60 full-time counselors in the past three years. As the faculty has increased, CMH has prioritized creating a diverse workforce to support the needs of the student community. This commitment is highlighted through the [BIPOC website](#). CMH provides:

- Crisis support: students are encouraged to walk in for urgent matters at both Engemann and Eric Cohen Student Health Centers. After closing hours, students can call the 24/7 line at 213-740-9355 (WELL).

- Therapy services: Individual appointments to talk to counselors “one-on-one,” available both through TeleHealth and in-person, when needed, please schedule in [MySHR](#).
- Group counseling: Group Counseling provides spaces to make progress with people who share similar situations. Make an appointment through [MySHR](#) or call 213-740-9355 (WELL).
- Ongoing programs and services: [Drop-in \(“Let’s Talk...On Zoom!”\)](#) — an opportunity to talk one-on-one with a counselor. Each “Let’s Talk” is structured as a 30-minute drop-in for individual conversation. As an outreach activity, this is a good way to explore what talk therapy might be like. All USC students (currently enrolled or under the Student Health fee) are eligible to participate in this activity, regardless of geographic location. In addition, for [single-session workshops](#) to help with anxiety, sleep, relationships, and other topics, sign up via [MySHR](#).

USC STUDENT HEALTH, RELATIONSHIP AND SEXUAL VIOLENCE SERVICES AND PREVENTION (RSVP)

[USC Student Health, Relationship and Sexual Violence Prevention and Services](#) (RSVP) provides support through advocacy and confidential counseling to students who have experienced sexual/gender-based harm during their time at USC.

- RSVP provides free, confidential services to survivors of gender-based violence and facilitates educational and awareness programs to promote safer communities on campus and to enhance students' understanding of sexual violence, relationship abuse, stalking, and health relationships/sexuality.
- RSVP helps to facilitate the success of students who have experienced sexual/gender-based harm during their time at USC.

RSVP, which is a program of USC's Student Health, [Counseling and Mental Health](#), is under the direction of Dr. Deborah Schleicher, and faculty and staff are part of the Department of Psychiatry and Behavioral Sciences. Like the rest of USC Student Health, RSVP became part of Keck Medicine in 2017.

In January 2020, the university [announced](#) the creation of Relationship and Sexual Assault Confidential Advocates, a program that provides 24/7 on-call assistance to survivors, including transportation arrangements to a specialized center (SART/SARC, or sexual assault response team/center) for services, including medical treatment and forensic evidence collection. RSVP now has ten confidential advocates, two full-time, one part-time, and six per diem staff dedicated solely to helping survivors at USC. The

Confidential Advocates Program expanded the scope of services provided by RSVP, providing after-hours accompaniment to a forensic examination and free transportation.

Currently, clinical staff and advocates at RSVP provide all-hours on-call/crisis support, individual and group therapy, outreach, and trainings. Information shared by victims/survivors with clinical staff and advocates in the context of counseling and advocacy is maintained as confidential, consistent with California state law which protects the confidentiality of information shared with a sexual assault counselor.

RSVP Education and Prevention Programming⁴³

With respect to education and prevention programming, RSVP follows the Social-Ecological Model of Violence Prevention, a best practice approach to violence prevention at the society, community, relationship, and individual levels, and based on the logic model developed to guide programming (Casey & Lindhorst, 2009; Krug et al., 2002). RSVP educational efforts have been supported by a significant expansion in dedicated staff to support education and prevention.

Through its educational programs, RSVP promotes a culture of consent on the campus, facilitates discussions of power in relationships, promotes agency and awareness of sexual violence, promotes knowledge of healthy relationships and boundaries, promotes knowledge of resources both on campus and in the broader community, and provides confidential support and navigation

services to survivors of sexual and gender-based harm (including intimate partner violence, stalking, and sexual assault). RSVP provides facilitation for the in-person workshops for undergraduate students to complete during their academic careers at USC on affirmative consent, healthy relationships, and bystander intervention (CHR 1, 2, and 3). Staff also provide student organizations with facilitation, training, and outreach for student communities on campus, including fraternities, sororities, cultural groups, and athletic teams.

Programming includes participation in healthy sexuality education events, partnerships with Office of International Services, School of Cinematic Arts, educational events during awareness months (stalking, domestic violence, sexual assault), and leadership in the Campus Coordinated Response Team (CCRT).

USC STUDENT HEALTH, RSVP LGBTQ+ VIOLENCE PREVENTION AND INTERVENTION SERVICES

In early 2020, the university received a California Office of Emergency Services (CalOES) grant through RSVP to hire a full-time advocate to provide trauma-informed and culturally sensitive support services for Lesbian, Gay, Bisexual, Transgender, Queer, and more (LGBTQ+) students. The CalOES grant also allows USC to designate a half-time safety officer trained in trauma-informed approaches to implement ongoing training and consultation to other campus safety officers who may work with LGBTQ+ students. All intervention and prevention activities for this grant are guided by the CCRT, comprised of campus and community partners who have expertise in providing services to the LGBTQ+ community. The grant has allowed USC to expand its LGBTQ+ representation in its clinical

and prevention staff, which now includes a violence prevention educator/specialist, an advocate, a clinician, and a student worker.

Notably, in 2022, the Keck Medicine of USC Hospitals and Student Health earned top scores in the [Human Rights Campaign Foundation's Healthcare Equality Index \(HEI\)](#). The HEI evaluates and scores healthcare facilities on detailed criteria in four categories:

- Foundational policies and training in LGBTQ+ patient-centered care
- LGBTQ+ patient services and support
- Employee benefits and policies
- Patient and community engagement

⁴³ While RSVP is a confidential resource with respect to advocacy and mental health treatment, the prevention and education work is not part of its confidential designation.

USC STUDENT HEALTH, OFFICE OF HEALTH PROMOTION STRATEGY – USC WELL-BEING COLLECTIVE

The [USC Well-being Collective](#) (Collective) is a coalition of academic schools, administrative units, and student organizations committed to a common agenda – strengthen a campus culture driven by well-being. As the administrative core for the USC Well-being Collective, the [Office of Health Promotion Strategy \(HPS\)](#) works with partners to align programs, policies, and systems level change toward four strategic goals identified as being critical to shifting USC’s campus culture:

- **Goal 1:** To enhance a culture of equity and inclusion
- **Goal 2:** To create a culture where individuals and communities thrive
- **Goal 3:** To disrupt the culture of at-risk substance use
- **Goal 4:** To foster a culture of consent and healthy relationships

HPS is directed by Paula Swinford and is comprised of faculty and staff who are part of the Department of Family Medicine, Keck Medicine of USC. HPS became part of Keck Medicine in 2017. Serving as an extension of the Collective’s backbone, HPS employs a cohort of 10 to 15 students who are known as Community Health Organizers to center student representation and voices.

The USC Well-being Collective was founded in January 2019 when the USC Division of Student Affairs, USC Student Health, and the Title IX Office joined together to apply the Collective Impact Framework to address campus-wide concerns. The Collective Impact Framework is a “network of community

members, organizations, and institutions who advance equity by learning together, aligning, and integrating their actions to achieve population and systems level change.”⁴⁴

HPS is using an adapted Collective Impact Framework because partners are from a single institution. The Collective has a Leadership Group made up of senior-level administrators whose units are participating partners in the Collective. The Leadership Group’s work includes initiating health promotion actions to align their units towards the common agenda and strategic goals. HPS organizes and guides working groups for each strategic goal:

1. Consent and Healthy Relationships – Align campus-wide efforts related to sexual assault prevention
2. Environmental Scan – Assess and increase safety measures within the built environment
3. Drug Free Schools and Communities Act – Satisfy federal mandate related to drug and alcohol abuse prevention
4. The International Okanagan Charter for Health Promoting Universities and Colleges Adoption Group – Foster conversations to initiate strategic planning to embed health into all aspects of campus culture

The Consent and Healthy Relationships working group is one of the original working groups established in 2019. At that time, the Collective’s infrastructure consisted of a steering committee of executive leadership and four working groups that corresponded to the four strategic goals.

Each working group was led by members of the steering committee, one member of HPS, and two student representatives. The working group was founded with the following campus partners in addition to others:

- Title IX
- Student Health, Relationship and Sexual Violence Prevention and Services (RSVP)
- Student Life, Fraternity & Sorority Leadership Development
- Student Life, Residential Education
- Department of Public Safety (DPS)
- Student Life, Office of Student Accessibility Services

Today, it continues to be led by Dr. Sarah Van Orman, Chief Campus Health Officer and Vice President for Campus Health, and Dr. Monique Allard, Vice President of Student Life, both of whom are part of the Collective’s Leadership Group. The working group also consists of Dr. Deborah Schleicher, RSVP Director, and Linda Hoos, Vice President for the Office for Equity, Equal Opportunity, and Title IX, along with key staff members of those offices.

HPS tracks progress on the four strategic goals using eight Key Performance Indicators (KPIs):

- **KPI 1: Belonging at USC** – proportion of students experiencing belonging at USC
- **KPI 2: Fairness and Equity in the Classroom** – proportion of students reporting being treated fairly and equitably in classrooms and classroom-like settings

- **KPI 3: Fairness and Equity outside the Classroom** – proportion of students reporting being treated fairly and equitably in out-of-class university spaces
- **KPI 4: Flourishing** – proportion of students experiencing flourishing
- **KPI 5: At-risk Drinking: All Students** – proportion of all students reporting at-risk drinking in the past two weeks
- **KPI 6: At-risk Drinking: Incoming Students** – proportion of incoming undergraduate students reporting at-risk drinking after the first six weeks on campus
- **KPI 7: Sexual Assault** – proportion of students who experienced sexual assault in the past 12 months while at USC
- **KPI 8: Upstanding Behaviors** – proportion of students who reported upstanding behaviors

Administered annually since 2018, the Student Well-being Index Survey (SWIS) serves as the primary source to track the eight KPIs as shared data for the Well-being Collective. The results of these surveys to date and the target metrics set for 2030 can be viewed on the [Well-being Collective’s website](#).

⁴⁴ Source: “[Centering Equity in Collective Impact](#)” by John Kania, Junious Williams, Paul Schmitz, Sheri Brady, Mark Kramer, and Jennifer Splansky Juster, 2021.

USC WORKWELL CENTER

The [USC WorkWell Center](#) (formerly the Center for Work and Family Life) supports faculty, staff, and their dependents, as well as post-docs and retirees. The WorkWell Center goes beyond traditional Employee Assistance Program offerings to focus on well-being programs that support the whole person:

- **Individual, solution-focused counseling** for personal and work-related concerns
- **Work/life and wellness talks** tailored for your department, unit, or workgroup
- **Workplace consultations** for leaders and supervisors to support and manage staff

- **Executive coaching** by certified coaches for director-level and above employees, faculty, and physicians
- **Health & Well-being Program** for faculty and staff to live healthy lifestyles and foster a culture of health throughout the campus through coordinated activities and events — the flagship program is [Healthy Campus Initiative](#), which aims to incorporate health and well-being into the daily work life of faculty and staff

OMBUDS

In January 2019, the university created the [USC Office of the Ombuds](#) to provide independent, confidential, and impartial support for the USC community. The Office of the Ombuds serves as a problem-solving resource and strives to create a safe place for people who come to the office to discuss and examine concerns. The Office of the Ombuds can help address a wide variety of issues and concerns, including organizational climate, change management, interpersonal issues, ethical concerns, issues of perceived unfairness or incivility, behavioral or stylistic differences in the workplace or classroom, or inquiries related to university procedures and policy. Importantly, the Office of the Ombuds does not replace other campus resources but instead is an informal place where members of the campus community can explore a concern, policy, or issue, or evaluate

whether to report an issue to the appropriate campus office. The Office of the Ombuds can also identify patterns, trends, or systemic concerns and share this upward feedback with the university through anonymized and depersonalized data and information.

The Office of the Ombuds is independent and confidential by design and structure and, therefore, occupies a unique space in the university's organizational chart. At USC, the Office of the Ombuds reports, by a dotted line, to the Provost's Office, but it maintains a budgetary line through the Vice Provost for Campus Wellness and Crisis Intervention.

Katherine Greenwood is the University Ombuds at the University Park Campus, and Thomas Kosakowski is the University Ombuds at the Health Sciences Campus. ■





The University of Southern California is committed to fostering a safe and inclusive environment in which all members of the community — including students, faculty, staff, patients, and visitors — can pursue their work, education, and engagement in university programs and activities free from discrimination, harassment, and retaliation.

The university is an equal opportunity educator and employer, proudly pluralistic, and firmly committed to providing equal opportunity for persons of all backgrounds and a diverse, inclusive, equitable environment. The university is committed to providing a safe and transparent university community and culture where discrimination, harassment, and retaliation are universally recognized as intolerable, where those who are harmed are provided support and resolution options, and where a fair and impartial

resolution process is provided to all parties. The university places great emphasis on those values and virtues that connect us as human beings and as members of the Trojan Community. USC's Unifying Values — Integrity; Excellence; Diversity, Equity, and Inclusion, Well-being, Open Communication, and Accountability — and the beliefs, actions, and associated behaviors that support those values contribute to a positive, respectful, and healthy university culture.

FIGHT ON FOR CIVIL RIGHTS!

If you observe or experience discrimination, harassment, or retaliation, related to a protected characteristic, contact USC's Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) for help at eeotix@usc.edu.

213-740-5086 | Monday to Friday, 8:30 a.m.-5 p.m.
King Hall, 1025 W. 34th Street, Suite 101,
Los Angeles, CA 90089

To report a concern at any time, including anonymously, visit the [USC Report & Response website](#) or call 213-740-2500 or 800-348-7454 (toll-free).

eeotix.usc.edu

ADVANCING EQUITY, EQUAL OPPORTUNITY,
AND INCLUSION

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