



May 16, 2022

Dear President Jacobs and OHSU Board of Directors:

We are pleased to provide you with the monthly report from the Implementation Committee charged with meeting the Covington Report recommendations. This third monthly report covers work completed in April 2022.

This month's work was focused on completing the initial phase of the collaboration with the Oversight Committee regarding the nationwide search for a new Executive Vice President for Human Resources and Chief People Officer. Our focus was also on the development of inaugural trauma-informed SBAR (Situation, Background, Assessment, Recommendation) proposals to meet a number of recommendations in the Covington Report. We shared these proposals with the Oversight Committee for review at their May meeting. This marks an important milestone in the execution of the methodology by which we will receive guidance from the Oversight Committee on responding to the recommendations.

We appreciate your ongoing support for our collective work and are grateful for the efforts of the members of both committees. Together, we will transform OHSU for the better.

We welcome your questions and comments.

Kind regards,

Susan Bakewell-Sachs, Ph.D., RN, F.A.A.N.  
Alice Cuprill Comas, J.D.

# Implementation Committee Monthly Report

Report #3 covering: April 2022

Submitted by: Susan Bakewell-Sachs, Ph.D., RN, F.A.A.N., and Alice Cuprill Comas, J.D.

## 1. HIGHLIGHTS

The work responding to the Covington recommendations moved into a new phase in April after OHSU formally launched the nationwide search for a new Executive Vice President for Human Resources and Chief People Officer. The collaboration between the two committees on the EVP search helped to inform the development of the trauma-informed SBAR (Situation, Background, Assessment, Recommendation) model now being deployed to meet the Covington recommendations. This month, the Implementation Committee completed two inaugural SBAR proposals and initiated a review with the Oversight Committee. It is anticipated that the ensuing bi-directional iterative process between the committees and the associated revisions will culminate in an approval of the two SBARs. This month, the Implementation Committee also focused on developing the next set of SBARs to share with the Oversight Committee, on aligning work underway in Human Resources with the corresponding SBARs, and on expanding the communications framework to support communications related to workplace changes or information about new/updated policies, procedures or practices associated with meeting the Covington recommendations.

## 2. ACTIVITY OVERVIEW

The Implementation Committee met twice this month—April 6 and April 21, from 2:30 to 4:00 p.m. each time. This section of the monthly report summarizes the work undertaken by the Implementation Committee during these two meetings as well as relevant efforts completed between formal meetings. The five topics covered in Section 2 are listed here and discussed below:

- Status of trauma-informed SBAR proposals (two completed)
- Completion of a scope-of-work document linking Covington recommendation to SBARs
- Completion of an inventory of actions underway in Human Resources and AAEO that may help meet some Covington recommendations
- The co-chairs presentation to the OHSU Board of Directors
- The expansion of the communications framework

**Status of SBAR proposals (two completed).** During this period, the foundational efforts of the Implementation Committee since inception to develop an efficient and effective method by which the two committees would collaborate resulted in the completion of the inaugural

trauma-informed SBAR proposals for several high-priority Covington recommendations. As described previously in March's report, the Implementation Committee has adopted the SBAR tool customized to include the trauma-informed "four-questions" lens. The SBAR tool—Situation, Background, Assessment, Recommendation—is a standardized OHSU project management tool (form) by which new projects, policies or other change efforts are concisely explained and justified.

During April's first meeting, committee members reviewed and refined the SBAR model conceptually, using an example focused on reinstating permission for OHSU managers to hire from outside the institution (a Covington recommendation associated with the broader goal to increase the diversity of OHSU's workforce). Based on this exercise, content for three SBARs was developed outside of the meetings by managerial leads and committee staff, and subsequently presented to the full Implementation Committee for discussion during the second meeting on April 21. Following this in-meeting review, the committee members decided that, with some additional edits, two of the SBARs were ready to be shared with the Oversight Committee for their input, and one required additional refinement and would be discussed again at a subsequent meeting before its release to the Oversight Committee.

The two SBAR proposals that were approved for presentation to the Oversight Committee were *"Realign the Affirmative Action and Equal Opportunity Department (AAEO)"* and *"Centralized Report Tracking – EthicsPoint."* These two SBARs address the following Covington Report recommendations:

- Establish AAEO as a separate, neutral, independent investigative and compliance function with responsibility for investigation of conduct that potentially violates Title VII or Title IX. To maintain its independence and neutrality, and ensure accessibility to students, separate AAEO from HR or CDI, which have fundamentally different objectives and goals. Instead, we recommend that AAEO report to Integrity, itself a compliance function, which reports to OHSU Legal. (Page 44 of the report)
- To reduce and focus the workload of AAEO investigators, consider transferring, with an appropriate transition and training plan, the handling of ADA employee accommodation requests from AAEO to HR (for the full lifecycle of a request through implementation of the accommodation). (Page 44)
- Promulgate clearer guidance concerning which investigations are to be conducted by AAEO and which are to be conducted by HR, as well as guidelines for when other departments, such as Legal, should be consulted in connection with investigations. (Page 45)
- Revise and streamline reporting and investigation procedures to ensure more clear and consistent processes for reporting parties, mandatory reporters and investigators (Page 45)

The provisional SBARs were distributed to the Oversight Committee members on May 4 for review and discussion at their May 12 monthly meeting. Implementation Committee co-chairs

Susan Bakewell-Sachs and Alice Cuprill Comas will attend part of this meeting to provide information on the two SBARs.

It is anticipated that the discussion of the inaugural SBARs will initiate a bi-directional process that will result in a final SBAR approved by the Oversight Committee from which a project execution plan—including scope, schedule and budget—will be subsequently developed. The review of the first two SBARs will provide preliminary information regarding the time the Oversight and Implementation committees may need to review each SBAR, and the type of feedback/refinements. In turn, this will help shape a broader understanding of the overall timeline for meeting the full suite of the Covington recommendations.

During April, the Implementation Committee also developed a preliminary prioritization list for the next set of SBARs. This sequencing ranks first those Covington recommendations for which internal work was already underway such that some or all of design of and/or content for the trauma-informed SBAR proposal are ready. As part of this prioritization, during April, committee staff met with the managerial leads of the eight workstreams to identify readiness and needs for immediate and future SBARs.

**Completion of a scope-of-work document linking Covington recommendation to SBARs.**

Within the Covington report, some recommendations are explicit and a corresponding SBAR is clear. For example, the recommendation to “establish AAEO as a separate, neutral, independent investigative and compliance function” results in a discrete and measurable outcome. In other cases, however, recommendations are broader, and will require integrated component SBARs. For example, the recommendation to “develop a strategic institution-wide DEI vision with actionable, meaningful, and prioritized initiatives to be led by CDI” may require more than one SBAR and overlaps with other Covington recommendations related to DEI, such as a later recommendation in the report that OHSU “ensure effective collaboration between CDI and all DEI-focused functions.” This means a unique SBAR may play a role in meeting multiple Covington recommendations.

The adoption of the trauma-informed SBAR model requires, thus, identifying the SBAR or SBARs needed for each recommendation and identifying in what cases an SBAR might meet overlapping recommendations. This month, Implementation Committee staff in collaboration with workstream managerial leads, completed a provisional scope-of-work document in which the Covington recommendations are categorized within the eight workstream categories and then for each recommendation, relevant SBARs are explicitly identified. This effort provisionally identified a total of 29 discrete SBARs across the eight workstreams, which together capture the full suite of Covington recommendations. This scope-of-work document will serve as a managerial touchstone for the Implementation Committee.

Of note, the bi-directional review and refinement process for the two inaugural and subsequent SBARs will undoubtedly continue to reshape aspects of this provisional identification of 29 SBARs, as new ones are identified, and existing ones modified. For this reason, this scope-of-work document is considered a “living” document and will be recast and updated as needed.

**Completion of the inventory of actions underway in Human Resources and AAEO that may help meet Covington recommendations.** Many Covington recommendations focus on organizational changes to the OHSU Human Resources Department and have an impact on its existing policies, practices or procedures. Additionally, some recommendations focus on changes to the Affirmative Action and Equal Opportunity office. In both cases, efforts aligned with certain recommendations were underway prior to the receipt of the Covington Report. Understanding the full scope of this ongoing work ensures it will be appropriately integrated into and aligned with the SBAR proposal development for the corresponding Covington recommendations.

During April, Implementation Committee members representing Human Resources met with committee staff to develop a detailed alignment map of all activities underway in HR and AAEO that may fully or partially meet a Covington recommendation. A significant amount of overlap was identified, although the degree to which this work meets the Covington recommendations varies. Further, the Covington recommendations are, in some cases, structured such that they cut across programs and practices. For example, multiple recommendations reference changes to OHSU's Code of Conduct. A revision of OHSU's Code of Conduct has been in progress for more than a year, at the direction of President Jacobs. This ongoing revision of the Code of Conduct captures several of the diffused recommendations. The alignment mapping, thus, will provide workstream managerial leads with data and information needed to ensure that SBAR development leverages existing efforts and resources efficiently.

**The co-chairs presentation to the OHSU Board of Directors.** The co-chairs of both the Implementation Committee and Oversight Committee presented an update to the OHSU Board of Directors regarding the work responding to the Covington Report recommendations. These presentations were made on April 22 as part of the Board's regularly scheduled public meeting. Members of OHSU, the public and the media were invited to attend.

Presenting first, the Implementation Committee reviewed the progress to date, with Co-chair Alice Cuprill Comas stating, "We have spent a great deal of time grounding ourselves in trauma-informed systems change, we want to do things differently, this is not a project to manage but a culture to change." Co-chair Susan Bakewell-Sachs provided an overview of the bi-directional process between the committees that was piloted successfully for the Executive Vice President for Human Resources and Chief People Officer recruitment and how this provided the necessary data and insights to develop a process for meeting other recommendations. The co-chairs identified the eight workstreams into which the Covington recommendations have been categorized, provided an overview of the SBAR process, and described the trauma-informed Diversity, Equity, Inclusion and Belonging lens—the four questions that all SBARs must address.

A recording of both presentations to the Board has been posted to OHSU's intranet (O2) and the public-facing website. A summary of the Oversight Committee co-chairs' presentation to the Board of Directors is provided in that monthly report for April.

**The expansion of the communications framework.** As the work responding to the Covington recommendations moves into its next phase with the SBAR development, a new framework to communicate details regarding changes to policies, procedures or practices affecting OHSU members is needed. Initial work to conceptualize this expanded communications framework and to identify staffing needs was undertaken in April. This framework will be organized around the eight workstreams so that each will have a communications staff person embedded in the proposal development and, ultimately, project execution. This structure will enable timely and accurate communications to OHSU members about the workplace effect of meeting the Covington recommendations.

In addition, planning for the first of a series of all-OHSU forums about the response to the Covington recommendations was initiated. President Danny Jacobs will host these forums, accompanied by co-chairs of both committees. These forums will provide opportunities for OHSU members to learn more about the response process, ask questions and share feedback.

### 3. PROGRESS AGAINST RECOMMENDATIONS

During this period, the nationwide search for the new Executive Vice President for Human Resources and Chief People Officer was launched. This collaborative effort informed the subsequent development of the trauma-informed SBAR model to develop proposals and receive feedback from the Oversight Committee regarding the Covington recommendations.

In April, the focus of the Implementation Committee was to execute on this trauma-informed SBAR model, moving the overall response process into a new phase. Two inaugural proposals were developed and shared with the Oversight Committee for review and feedback. The Implementation Committee developed a scope-of-work document organized around the eight workstreams into which all recommendations are grouped and now the corresponding 29 SBARs have been identified. Progress was made on prioritizing the next set of SBARs, based on design readiness due to work underway associated with the recommendations, and/or ease of implementation.

Additionally, infused through multiple Covington recommendations is an expectation that actions and outcomes to meet these recommendations will be broadly and effectively communicated. The work to expand the communications framework is intended to meet this common element.

### 4. ASSESSMENT AND LOOK AHEAD

Looking ahead, this committee will focus on six areas:

1. Developing the provisionally identified 29 SBAR proposals to meet the Covington recommendations to share with the Oversight Committee for review and feedback. This

work will be sequenced initially based on the readiness of the foundational work to develop an SBAR proposal (those farther along will be developed first).

2. Revising the two inaugural SBAR proposals now under review by the Oversight Committee until they are approved to move into the project execution phase.
3. Refining the overall SBAR methodology as/if needed based on insights about the process gained from the review of the first two SBARs.
4. Continuing to focus on the next stage of the nationwide search for the Executive Vice President for Human Resources and Chief People Officer and engaging the Oversight Committee in this next phase of the search.
5. Developing the plan to expand communications to accommodate the shift from sharing information about the response process overall to providing more detailed information about how changes to policies, practices or procedures may affect OHSU members. This expanded framework also includes providing support for a series of all-OHSU drop-in forums about the response to the Covington recommendations.
6. Launching the accountability framework, also called the dashboard (please see March report for more detail on this topic).