



June 15, 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 fourth monthly report covers work completed in May 2022.

The work in May marked the beginning of a new phase in our shared response to the Covington Report recommendations. The trauma-informed methods developed as part of our initial collaborative pilot process with the Oversight Committee to develop the position description for the Executive Vice President for Human Resources/Chief People Officer are now being deployed. We submitted the first two proposals to the Oversight Committee for review in May and received significant feedback on both, integrating the commentary and developing second-round proposals for the Oversight Committee to consider. This process is thus far demonstrating the value and viability of this inclusive, trauma-informed approach to meeting the Covington recommendations and this interim success allows us to collaboratively map the way forward, as described in this report.

We welcome your questions and comments.

Kind regards,

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# Implementation Committee Monthly Report

Report #4 covering: May 2022

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## 1. HIGHLIGHTS

The work in May reached an important new milestone. The Implementation Committee presented the first set of trauma-informed SBAR (Situation, Background, Assessment, Recommendation) proposals to the Oversight Committee for review. The ensuing feedback process between the committees has been highly constructive, significantly improving the two proposals (*Realign the AAEO* and *Centralized Report Tracking*) and providing new insights into the process itself. The Implementation Committee has identified the next four proposals to develop and present to the Oversight Committee, defined the full suite of SBAR proposals needed to meet all Covington recommendations and, together with the Oversight Committee, established preliminary protocols regarding the pace of proposal development and expectations for bi-directional review. Also in May, the accountability framework was finalized and shared with the Oversight Committee before the subsequent all-OHSU launch. Last, associated with the goal of always improving communications, the Implementation Committee co-chairs attended the first part of the Oversight Committee's monthly meeting and also participated in the first of a series of all-campus drop-in forums about the Covington response work hosted by President Jacobs.

## 2. ACTIVITY OVERVIEW

The Implementation Committee met two times this month — May 5 and May 19, from 2:30 to 4:00 p.m. each time. This section of the monthly report summarizes the work undertaken during these two meetings as well as relevant efforts completed between formal meetings. The six topics covered in Section 2 are listed here and discussed more fully below:

- Status of bi-directional review/revision of first two trauma-informed SBAR proposals
- Establishment of sequencing protocols for future SBAR proposals
- The development of future SBAR proposals for Oversight Committee review
- Expected launch of the accountability framework, also called the dashboard
- Co-chairs presentation at the Oversight Committee meeting
- Participation in the first drop-in forum

**Status of bi-directional review/revision of first two trauma-informed SBAR proposals.** As reported last month, the Implementation committee developed and submitted two SBAR proposals to the Oversight Committee.

- Realign the Affirmative Action and Equal Opportunity Department (AAEO)
- Centralized Report Tracking – *EthicsPoint*

The four Covington recommendations addressed by these proposals were listed in the April report to the Board of Directors. The SBARs were distributed to the Oversight Committee members on May 4 and were reviewed and discussed at their May 12 monthly meeting. This first-round of feedback was then provided to the Implementation Committee by the Oversight Committee co-chairs. A qualitative summary of the key themes in the first round of feedback for both proposals is provided in the Oversight Committee May report.

The feedback was reviewed in full by the Implementation Committee at its May 19 meeting. The Implementation Committee deployed a RAG (Red, Amber, Green) tool, responding to each piece of feedback from the Oversight Committee members on a line-by-line basis. The response indicated specifically if, how and why the suggested changes would be integrated into revised SBAR proposals.

As shown in the chart below, the majority of the feedback on the proposals fell into the Green and Amber categories, and could be integrated into a revised proposal directly (Green) or with some degree of explanation required (Amber). The feedback falling into the Red category was largely because of three reasons: 1) a suggested change was to the SBAR structure itself, rather than to the content of the proposal; 2) a suggested change was to the Covington recommendation, which is outside the scope of this process; or 3) a suggested change was stylistic/editorial in nature and did not affect content. Further, as noted in the chart below, some feedback, which is included in the Amber counts below, fell into the category of outside the scope of this proposal but will be covered in a subsequent SBAR. This information was also provided to Oversight Committee members.

*Summary of first-round Oversight Committee feedback (number of comments)*

SBAR	Red	Amber	Green	Total	Other SBAR
Centralized Reporting System	24	36	26	86	31
Realign the AAEO	20	41	34	95	30

For the purpose of fully describing the bi-directional review/revision process between the two committees, the chart below is an excerpt of a RAG response template showing three examples of Oversight Committee feedback (left column) and the response from the Implementation Committee (right column) for the SBAR proposal “*Realign the AAEO.*”

*Example of a RAG response template*

ID SBAR Recommendation		Notes
Under 'Situation' section		
2	I agree with the Covington recommendation to move it to Integrity rather than having it housed in HR. However, I believe only the investigative and compliance functions of AAEO should live in Integrity. This should allow them to remain and appear neutral.	This is consistent with the recommendation. The ADA accommodations responsibilities (except those related to Title IX) will remain with HR.
3	The accommodation requests should be moved to the center of diversity and inclusion. The inclusion part of that department should be responsible for the accommodation requests. "	Accommodation requests will be addressed in more detail in another SBAR - <i>Transfer Responsibility for Accommodations from AAEO to HR.</i>
13	Not sure if integrity is the right fit either. Should report to President directly. Need neutrality and someone who knows civil rights and law. Director of Integrity or team members might not be best fit. We need to regain trust in OHSU Community.	The Covington Report is the result of a months-long investigation by a firm with significant experience in conducting investigations of this type. The investigatory process included interviews with OHSU members, including leaders from major OHSU unions and employee resource groups; focus groups; and extensive reviews of documents and data. The information gathered was then used to develop a set of concrete recommendations for the organization. For these reasons, the OHSU Board of Directors charged OHSU with implementing the recommendations as set forth in the Report. The initial scope of work for the Implementation Committee is to implement the recommendations in the Report. However, trauma informed principles suggest that we regularly revisit and re-evaluate decisions to ensure that expected outcomes were achieved. As part of this work, we will be implementing processes to monitor the effectiveness of decisions and to make changes, if needed.

The RAG responses to the first round of feedback to both proposals were provided to the Oversight Committee members, along with revised SBAR proposals in which the feedback was integrated, for a second round of review, which is ongoing. This bi-directional process will continue until the Oversight Committee approves the proposals.

Insights gleaned from the review/revision between the two committees on this first set of SBARs that may help refine the process going forward are being collected and shared with members of both committees for the purpose of making shared decisions on potentially refining the process. Examples are:

- The process is time-intensive: Six to ten hours per proposal were required to complete a feedback RAG template after the first round of Oversight Committee review; this is a mix of staff time and Implementation Committee member discussions during meetings. Committee co-chairs are mindful of the need to manage the time effectively for all involved.
- In some cases, the feedback review could be triaged: To better manage the meeting time assigned to feedback review and integration, workstream leaders/SBAR authors could undertake an initial review, bringing forward only the Amber and Red categorizations for discussion at the full Implementation Committee meetings.

- Timelines for completion depend on the type and volume of feedback: Some feedback in this initial round from the Oversight Committee required new research beyond the expertise contained within the membership of the Implementation Committee; when this occurs, the timelines will adjust accordingly.
- The SBAR structure can be improved: Some feedback showed how the SBAR template itself could be structurally improved, and as appropriate, these refinements will be integrated into subsequent proposals.

**Establishment of sequencing protocols for future SBAR proposals.** A goal shared by both committees is to establish a predictable cadence for proposal development and review/revision so that the workload is sequenced in a way that is manageable and ensures the Covington recommendations are being met time-efficiently. This latter point is critically important to rebuilding community trust; OHSU members understandably want to see tangible changes in response to the issues raised in the Covington Report as soon as possible.

To this end, the co-chairs in consultation with members of both committees have established preliminary protocols for the development and review of SBAR proposals. These guidelines are provisional and are designed to support the initiation of the process; they are likely to evolve as more data and insights are gained from the application of the SBAR process.

- SBAR proposals will each be about five pages in length.
- A single SBAR may cover multiple Covington recommendations because some recommendations are overlapping.
- A Covington recommendation may require multiple SBAR proposals because some contain multiple outcomes.
- The Implementation Committee will develop SBAR proposals based on a schedule determined internally but will present no less than four SBARs per month to the Oversight Committee for review.
- Oversight Committee members will share an SBAR proposal with the groups they represent to collect feedback within seven days of its receipt. As needed, these timelines will be adjusted depending on the degree of feedback/revisions.
- Oversight Committee members will receive a Smart Sheet (a collaborative online tool) for each SBAR to facilitate feedback and so that members can see the feedback of others.
- A revised SBAR in which Oversight Committee feedback has been integrated will be sent to the Oversight Committee co-chairs within seven days of receipt of the feedback by the Implementation Committee; notice will be provided if the degree of feedback requires more time.
- The goal is for each SBAR to take no more than 21 days for bi-directional review, depending on the volume and type of feedback.
- Some SBARs may require more or less time based on proposal content complexity.

**The development of future SBAR proposals for Oversight Committee review.** As reported in March, the Implementation Committee has developed a scope-of-work document identifying and defining the number of SBAR proposals needed to meet the totality of the Covington recommendations. As the work unfolds, and the bi-directional process is undertaken for each, it is expected that this number will fluctuate depending on feedback from the Oversight Committee.

Currently, the committee has identified 31 proposals that, taken together, will meet all the Covington recommendations. These 31 SBAR proposals are listed below. For those underway or with an assigned target month for presentation to the Oversight Committee, that information is indicated in parentheses. The assignment of target dates for the remaining SBAR development is in progress. As noted in the parentheses, and in keeping with the preliminary sequencing protocols discussed above, four SBAR proposals will be developed and shared with the Oversight Committee in June and another set of four in July.

Please note the following caveats to the SBAR proposal list presented below:

- The numbers associated with the SBAR proposals listed here are for ease of reading in this report only and do not track to other documents.
- Information about how to track which Covington recommendations these SBAR proposals are responsive to is provided in the following section, *Launch of the Accountability Framework*.
- Meeting the Covington recommendation to recruit a new Executive Vice President for Human Resources/Chief People Officer is underway and is being met outside of this SBAR process (hence, it is not listed below). An update about the status of this nationwide search will be provided in July.

### ***List of SBAR proposals to meet the Covington recommendations***

1. Develop and Communicate a Strategic DEI Vision for the Organization (*July*)
2. Develop Strategies to Support the DEI and Anti-Racism Vision and Goals
3. Operationalize Commitments to DEI and Anti-Racism
4. Continue to Conduct Regular Employee Engagement Surveys (*June*)
5. Respond to Nationwide and Internal Events
6. Clearly Define and Communicate the Roles and Responsibilities for CDI at OHSU (*June*)
7. OHSU Center for Diversity & Inclusion (CDI) Collaboration with DEI-Focused Functions (*July*)
8. Develop and Conduct Additional DEI-Related Trainings
9. Centralize HR Staff and Functions (*July*)
10. Increase the Number and Diversity of HR Business Partners
11. Provide Sophisticated Training to HR Investigators (*July*)

12. Realign the AAEO (*SBAR developed; now under Oversight Committee review*)
13. Increase the Number and Diversity of AAEO Investigators (*July*)
14. Provide Sophisticated Training to AAEO Investigators
15. Transfer Responsibility for Accommodations from AAEO to HR
16. Re-enable External Hires (*completed*)
17. Increase the Diversity of Candidate Pools for Leadership Positions
18. Develop Diversity, Equity, Inclusion and Belonging Objectives for Managers
19. Report on HR Metrics
20. Report on Incident-Related Metrics
21. Update the Code of Conduct
22. Update the Discrimination, Harassment and Retaliation Policy (*June*)
23. Update the Reporting Policy
24. Reduce the Complexity of Reporting Channels
25. Develop a Centralized and Standardized Approach to Complaint Recordkeeping (*SBAR developed; now under Oversight Committee review*)
26. Clarify and Communicate Mandatory Reporting Requirements
27. Develop and Communicate a Standardized, Comprehensive Investigations Policy
28. Develop and Communicate a Standardized Approach to Investigations
29. Revise, Finalize and Communicate the Proposed Disciplinary Matrix (*June*)
30. Provide Clear, Robust Communications Highlighting Prohibitions against Retaliation
31. Implement Procedures to Monitor for Potential Retaliation

**Expected launch of the accountability framework, also called the dashboard.** As previously reported, the two committees — in collaboration with OHSU Enterprise Program Management Office staff — have been developing an accountability framework, an excel-based tool to track efforts to meet the recommendations. Also called the dashboard, this tool centers both accountability and transparency in this transformative work by linking every Covington recommendation with its associated workstream and SBAR proposal (or proposals), providing status information on the development and review of each SBAR.

The dashboard was completed in May and provided to the Oversight Committee for advance review. The dashboard will be shared with the OHSU community in June. It will be regularly updated as one of several mechanisms to keep OHSU members apprised of the status of meeting the Covington recommendations. Later, as proposals are approved and moved into the execution phase, the status of this project implementation will be added to the dashboard.

At this stage of the work finalizing the accountability framework, context regarding the way the recommendations are articulated in the Covington Report itself is important to understand the complexities involved in creating — and to a degree, using — the dashboard.

While some Covington recommendations are discrete and can be linked to an individual responsive SBAR proposal (for example, recommendation “A2,” *Continue to conduct employee engagement surveys*), others contain multiple “sub-recommendations” within what is categorized in the report as a single recommendation. For example, in the “Tone from the Top” section, on page 42 of the Covington Report, the recommendation identified as “A1” states to:

*“Develop ambitious, concrete, and measurable plans for organizing and operationalizing commitments to DEI and anti-racism guided by these findings and recommendations. Dr. Jacobs, the Board of Directors, and the executive leadership team should communicate these plans to the OHSU community, including implementation timelines and mechanisms for holding designated leaders accountable and should provide periodic progress updates.”*

Because this recommendation contains sub-recommendations, meeting it requires the development of three SBARs:

- Develop and Communicate a Strategic DEI Vision for the Organization
- Develop Strategies to Support the DEI and Anti-Racism Vision and Goals
- Operationalize Commitments to DEI and Anti-Racism

Other recommendations are written succinctly but are broad enough in scope to also require multiple SBARs. This example from the same section of the Covington Report, also on page 42, the recommendation identified as “B1,” demonstrates these attributes while illustrating the overlapping nature of some of the recommendations:

*“Develop a strategic institution-wide DEI vision with actionable, meaningful, and prioritized initiatives to be led by CDI [OHSU Center for Diversity & Inclusion].”*

The same three individual SBARs noted for recommendation A1 above will partially meet this recommendation, but one more SBAR is required to fully do so (italics below):

- Develop and Communicate a Strategic DEI Vision for the Organization
- Develop Strategies to Support the DEI and Anti-Racism Vision and Goals
- Operationalize Commitments to DEI and Anti-Racism
- *Clearly Define and Communicate the Roles and Responsibilities for CDI at OHSU*

In the tracking dashboard, therefore, recommendations may be met by multiple SBARs and multiple SBARs may appear as meeting more than one recommendations. Information about the way in which the Covington recommendations are articulated in the report and how this has been integrated in the accountability dashboard will be provided adjacent to the posting on the O2 intranet site and other places it is shared so that the OHSU community can clearly track the status of meeting each one.



**Co-chairs presentation at the Oversight Committee meeting.** At the May Oversight Committee meeting, the Implementation Committee co-chairs provided an update, the first of what will be a regular agenda item for each monthly meeting going forward. The co-chairs expressed gratitude for the opportunity to enhance communications between the two committees, described the commitment to the work and to it being a break from the past in terms of operationalizing change at OHSU, provided an overview of the trauma-informed rationale and methods underlying the SBAR workplan, and shared an introduction to the first two SBAR proposals. Their full presentation is summarized in the May Oversight Committee report.

**Participation in the first drop-in forum.** As part of the institutional commitment to transparency, the first of a series of drop-in forums covering the Covington response work was held May 23. President Danny Jacobs opened the forum with overview remarks, followed by comments from the co-chairs of the two committees. Deputy Chief of Staff Krista Klinkhammer then presented a “tour” of the Covington response O2 intranet site, identifying resources related to meetings, work outcomes, the FAQ, committee member bios, progress reports and trauma-informed systems change. After these opening remarks, attendees asked the president and co-chairs questions related to staff burn-out, accountability, methods underlying committee member selection, the relationship of the Covington response work to OHSU’s strategic plan, and what about this work excited each the most. The full recording of the first forum was posted on the OHSU Covington response O2 intranet website and was distributed to all OHSU members. A second forum will be held in June.

### 3. PROGRESS AGAINST RECOMMENDATIONS

The work of the two committees gained significant momentum in May, as noted below:

- The nationwide search for an Executive Vice President for Human Resources/Chief People Officer, a key Covington recommendation, is well underway. An update about this search will be provided in July.
- The bi-directional review/revision process for two SBAR proposals — *Realign the AAEO* and *Centralized Tracking for Reporting* — is also well underway and, barring unforeseen concerns, the proposals should move to the execution stage in June.
- The Implementation Committee will develop and present four new SBAR proposals to the Oversight Committee in June. They are:
  - Update the Discrimination, Harassment and Retaliation Policy
  - Clearly Define and Communicate the Roles and Responsibilities for CDI at OHSU
  - Continue to Conduct Employee Engagement Surveys
  - Revise, Finalize and Communicate the Proposed Disciplinary Matrix

## 4. ASSESSMENT AND LOOK AHEAD

In the coming months, this committee will focus on seven areas:

1. Revising the two inaugural SBAR proposals now under review by the Oversight Committee until they are approved and moved to the project execution phase.
2. After approval, developing execution plans for the first two SBARs to include scope, staff, budget and timelines.
3. Continuing to refine and adapt the overall trauma-informed SBAR methodology as needed based on insights about the process gained from the ongoing collaborative work.
4. Developing new SBAR proposals for review by the Oversight Committee, as described above.
5. Launching the accountability framework, also called the dashboard, which will include information on the timing of the development and/or review status of all SBARs, ensuring this tool is regularly updated and sharing information about this tool with the full OHSU community.
6. Continuing to support communications regarding this work, including a second all-OHSU drop-in forum to be held June 23.
7. Providing an in-person update from the co-chairs to the OHSU Board of Directors at their public meeting on June 24.