



June 15, 2022

Dear President Jacobs and OHSU Board of Directors:

This is the fourth monthly report from the co-chairs of the Oversight Committee about the shared work underway responding to the Covington Report. A monthly report is called for by our committee charter.

As we have noted previously, meaningful, trauma-informed culturally responsive change in an organization as complex as OHSU takes time and practice. We are very pleased to report that this month, we are beginning to see the tangible outcomes arising from this time and practice.

The Covington response work has reached important milestones, as described in this report, and we are shifting into a new phase of the work responding to each discrete recommendation, now that the trauma-informed foundation has been established. Further, we expect this momentum to build as the Oversight Committee continues to use its time wisely to deepen and refine our collaborative processes.

As always, thank you for your ongoing support as we work together to transform OHSU. We welcome your questions and input.

All our very best,

Alisha Moreland-Capua, M.D.

Michael Alexander, M.S.S.

# Oversight Committee Monthly Report

Report #4 covering: May 2022

Submitted by: Alisha Moreland-Capuia, M.D., and Michael Alexander, M.S.S.

## 1. HIGHLIGHTS

The work of the two committees is gaining significant momentum, building on the trauma-informed foundation that has been carefully constructed over the past several months. Two important milestones were reached this past month. First, an initial round of feedback from the Oversight Committee on the inaugural set of SBAR (Situation, Background, Assessment, Recommendation) proposals was provided to the Implementation Committee. This feedback represents both individual Oversight Committee member perspectives and the employee and student groups each member represents. The process to develop and review the two SBAR proposals is now being refined and deployed to meet the full suite of the Covington recommendations. Second, significant progress was made on the accountability framework, also called the dashboard. Centering transparency and accountability, this dashboard tool allows the OHSU community to track the response status for each Covington recommendation. After review by the Oversight Committee, this dashboard will launch in June.

Associated with and in addition to meeting these two milestones, during May, the Oversight Committee held its fourth full meeting. The Implementation Committee co-chairs attended the first part of the meeting to provide their perspectives on the collaborative work across the committees to date. After their status update, Dr. Alisha Moreland-Capuia continued the trauma-informed systems training she has been providing to the Oversight Committee, presenting the third mini-lecture on concepts underlying labeling theory, a means by which humans categorize complexity that also indirectly influences behavior. Finally, in May, Oversight and Implementation committee co-chairs participated in the first all-OHSU drop-in forum, hosted by President Jacobs, introducing a new means by which OHSU members can learn about the Covington response work, ask questions and provide input. A second forum is scheduled for June 23.

## 2. ACTIVITY OVERVIEW

The activity of the Oversight Committee this month focused on six areas, listed here and discussed in greater detail in the sections below:

- The fourth meeting of the Oversight Committee
- Trauma-informed systems change training (the impact of labeling/narrative)

- Update from the Implementation Committee co-chairs
- Review/revision of the first set of trauma-informed SBAR (Situation, Background, Assessment, Recommendation) proposals
- The accountability framework (dashboard) status
- Launch of the drop-in forum series for OHSU members

**The fourth meeting of the Oversight Committee.** The Oversight Committee met virtually on May 12, from 9 to 10:30 a.m. Thirty-two of the 36 members were present. Dr. Moreland-Capuia opened the meeting by asking the group to reflect on the quotation “The true meaning of life is to plant trees under whose shade you do not expect to sit,” from Nelson Henderson. Co-chair Alexander then refreshed the group on their community standards, after which he introduced the co-chairs of the Implementation Committee. This was followed by a presentation from Co-chair Moreland-Capuia (the third mini-lecture for trauma-informed systems change training). The remainder of the meeting was dedicated to the review of the two trauma-informed SBAR proposals. Finally, during open discussion, a committee member raised a concern about the volume of between-meeting work. Mr. Alexander responded that the co-chairs were cognizant of the workload and were seeking to help manage it, and that it was expected there would be differing degrees of contributions from time to time on an individual member basis. It was shared however that these variations could be accommodated at the committee-scale given the size of the group, each working to support others or to fill in gaps as needed.

**Trauma-informed systems change training.** As described in the first monthly report (February 2022), to help establish a common baseline of knowledge and vocabulary, Dr. Moreland-Capuia will spend about 10 minutes at each full Oversight Committee meeting providing a mini-lecture on key facets of trauma-informed systems change principles. During the May 12 meeting, Dr. Moreland-Capuia presented the third of these mini-lectures: *A Trauma-informed Organization Appreciates the Power of (and Checks) Narrative*.

Labeling and narrative (story-telling) are language tools that help humans categorize the complexity of our shared experiences. While these tools may seem innocuous in terms of meaning, research shows they play a critical role in shaping behavior. “The words we use to describe what we see aren’t just idle placeholders, they actually determine *what we see*,” said Dr. Moreland-Capuia, attributing the wording of this concept to researcher Benjamin Whorf. A trauma-informed organization understands that the way it describes itself can influence individual and group responses, and its collective culture, and thus is mindful of the responsibility that everyone within an organization has in how they communicate. “We know that a trauma-informed organization must check its narrative often if it wants to be inclusive. The narrative has to match the type of change that we hope to see.”

The slides from this mini-lecture were subsequently posted on the Covington response webpage on OHSU's intranet (O2), along with prior presentations and other resources for OHSU members to learn about trauma-informed systems change.

**Update from the Implementation Committee co-chairs.** At the April meeting of the Oversight Committee as part of the review of the committee charter, members said they would like to hear directly from the co-chairs of the Implementation Committee, noting that this directive was a part of the original Oversight Committee charter. In response, at the May meeting, an update was provided by the Implementation Committee co-chairs, the first of what will now be a recurring agenda item for each monthly meeting.

Co-chairs Alice Cuprill Comas, J.D., and Susan Bakewell-Sachs, Ph.D., R.N., expressed gratitude for the invitation to join the meeting, agreeing it was an opportunity to enhance communications, sharing their views on the core importance of the work responding to the Covington recommendations. The co-chairs then described the trauma-informed SBAR workplan being deployed by the Implementation Committee. This workplan was described in parallel with its evolution in the March and April reports from the Implementation Committee and is described here again in brief.

First, all recommendations in the Covington Report have been categorized into eight workstreams. These workstream groups align the recommendations in ways that are logical and efficient relative to what they affect, how they overlap and how they may be operationalized.

Second, managerial leads from within the membership of the Implementation Committee were assigned to workstreams. These individuals provide (or identify) the expertise and resources to develop proposals to meet the recommendations grouped within their workstream.

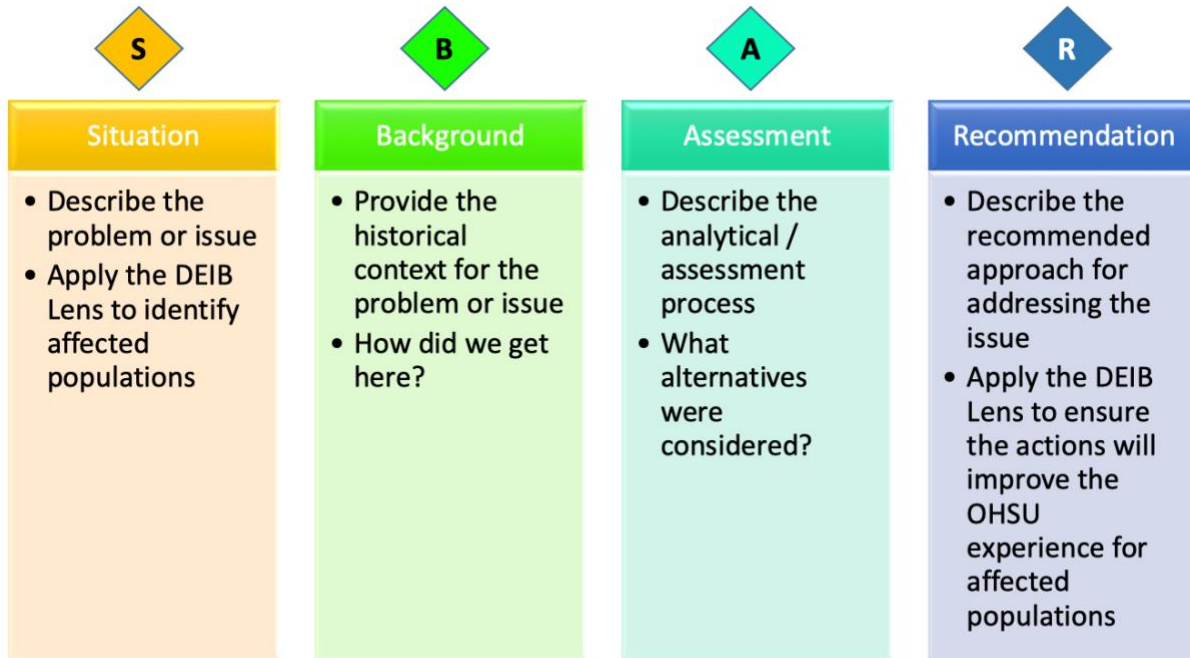
Third, a trauma-informed proposal to meet a recommendation is developed within the Implementation Committee using an SBAR (Situation, Background, Assessment, Recommendation) template, including the trauma-informed DEIB (Diversity, Equity, Inclusion and Belonging) four-question lens. (Please see the March report from the Implementation Committee for more information on the four questions).

Last, after the Implementation Committee (or a subset) agrees on an SBAR proposal, it is shared with the Oversight Committee for review and guidance. The ensuing revision process continues bi-directionally until all parties, or a majority as determined by the decision-making protocols of the Oversight Committee, conclude a proposal to meet a Covington recommendation is ready to move into the execution stage.

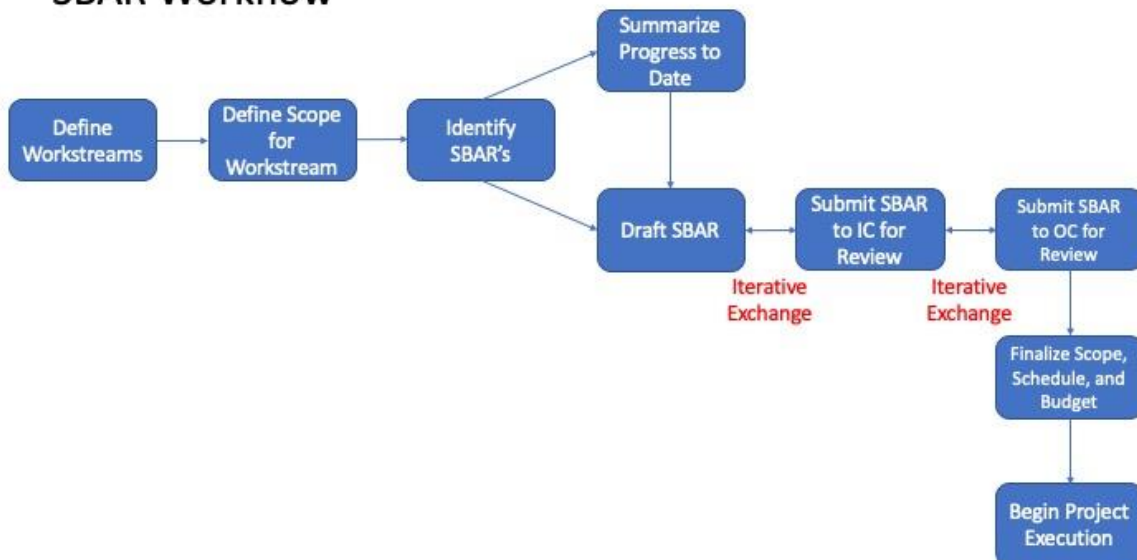
Concluding the briefing, Co-chair Cuprill Comas provided an overview of the first two SBARs ready for Oversight Committee review.

The figures below illustrate the SBAR proposal elements and the bi-directional review/revision workflow.

### SBAR Proposal Elements



### SBAR Workflow



**Review/revision of the first set of trauma-informed SBAR proposals.** The two proposals developed by Implementation Committee members under review by the Oversight Committee are “*Realign the Affirmative Action and Equal Opportunity Department (AAEO)*” and “*Centralized Report Tracking—EthicsPoint.*”

The 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)

Nine days prior to the Oversight Committee meeting, both SBAR proposals were provided to the members along with Smart Sheet (an online collaborative tool) forms to input their individual feedback and feedback collected from their represented cohorts. During the May 12 meeting itself, members broke into nine randomly assigned work groups to further discuss and refine proposal feedback.

To provide a sense of the review function of the Oversight Committee, broad themes emerging from the feedback provided before and during the meeting are provided below for the two SBAR proposals, along with a third section in which themes common to both proposals are described.

*Of note:* some feedback was at a level of detail that is beyond the summary nature of this report and while that granularity is not described here, the *entirety* of the feedback was provided to the Implementation Committee for integration into a revised set of SBAR proposals. Information about the integration of this feedback by the Implementation Committee into revised SBARs is provided in the latter’s May monthly report.

***Realign the Affirmative Action and Equal Opportunity (AAEO) department.*** From the SBAR proposal: *“Over the years, AAEO, an independent office, has been housed in various areas within OHSU, but is currently part of the HR organization, which has created a perception that AAEO is not an independent neutral body. The Covington Report recommends that OHSU realign the AAEO function, at least the investigative functions, to report into Integrity, which is itself a compliance function.”*

Broadly, the Oversight Committee members agreed that moving the AAEO into the Office of Integrity would ably meet the concerns of the OHSU community and a key Covington recommendation, although this assessment was not unanimous, and several caveats were called out. Of particular concern for some members was the fact that the Office of Integrity reports to the Legal Department at OHSU. This is a concern because Legal is perceived as being responsive to institutional concerns, rather than individuals, which could hinder trust-building. Also, some members commented that this could lead people to think that a complaint may require a legal basis to be made. An alternate proposal by a few members was that AAEO could report to the Office of the President or, as they understood the current organizational structure, could become an independent branch of Integrity, similar to the Institutional Review Board and IACUC. Committee members asked for more information about why AAEO was housed in various areas historically, concluding that this context might help develop mechanisms to provide for more permanence in the future. Concerns about staffing were raised, citing the need for expanded resources so the functions would be effectively performed, and that this should include trauma-informed training for all AAEO staff. (The latter will be part of a separate SBAR).

***Centralized Report Tracking – EthicsPoint.*** From the SBAR proposal: *“The current reporting processes and systems do not allow OHSU to adequately capture, monitor, and analyze case data across the institution in order to ensure that disciplinary decisions are being made in the context of all available information. The EthicsPoint Incident Management system would allow all groups to log and monitor reports in one system. Use of a single system would allow monitoring of all concerns raised about an OHSU member, no matter which office is handling the investigation or complaint. In addition, automated intake report forms would be developed to improve efficiency and the consistency and standardization of data.”*

The Oversight Committee members broadly agreed that centralizing report tracking should move forward but issues and caveats were raised in the review. These included, among others: confirming that the centralized process would be able to identify patterns of misconduct; that transparency about who has access to the reports was clear, as even a perception of retaliation could inhibit reporting; verifying that reports of a potential criminal nature would also be shared with OHSU Public Safety; recognizing that even with an effective incident tracking system, ensuring mandatory reporters meet their obligations remains key to success; possibly expanding the SBAR to include a public-facing dashboard

with de-identified information illustrating reporting/incident trends across campus, including a commitment to regularly update this information.

***Feedback themes common to both SBAR proposals.*** Oversight Committee members commented that more background information would be useful as some parts of the SBAR proposals assumed a degree of organizational knowledge most committee members don't have. For example, committee members felt information on why AAEO and/or tracking systems had failed in the past would aid in ensuring these historical mistakes were not repeated. Another common theme related to the issue of accountability: what mechanisms would be integrated into the execution plans to ensure the elements of approved SBAR proposals would be met, and what would happen if they were not? For example, one commenter noted that while moving the AAEO is a good start, it would be rendered irrelevant if the embedded investigative functions were ineffectually met. Commenters indicated that while these types of concerns may be addressed by SBARs responding to other Covington recommendations, rebuilding trust required they ideally be called out in the SBAR itself. Lastly, many committee members cited their gratitude ("great work!") to the Implementation Committee members for the thoughtfulness and effort that went into developing this first set of SBARs.

**The accountability framework (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 was completed in May and has been provided to the Oversight Committee for discussion/approval at the June meeting. This tool links every Covington recommendation with its associated workstream and SBAR proposal (or proposals), providing status information on the development and review of each SBAR. Once approved, the accountability framework will be shared widely with the OHSU community. This important tool centers both accountability and transparency in this transformative work.

**Launch of the drop-in forum series for OHSU members.** As part of the institutional commitment to transparency, the first of a series of (virtual) drop-in forums covering the Covington response work was held May 23. Hosted by President Danny Jacobs, with the co-chairs of both committees, the forum provided OHSU members with an opportunity to learn about the Covington response work and to ask questions, share feedback or raise concerns. President 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 is now posted on the Covington response O2 intranet website and was distributed to all OHSU members.

### 3. PROGRESS AGAINST RECOMMENDATIONS

Based on the activity during this reporting period, the Oversight Committee co-chairs are pleased to share that the collaborative work of both committees has reached pivotal milestones with the successful initiation of the bi-directional review of the first two SBARs and the imminent launch of the accountability framework. Further, the members of the Oversight Committee have demonstrated a strong commitment to the review process and to gathering feedback on the proposals from the OHSU groups they represent. This broad feedback helps to ensure the content of the proposals reflects the concerns and insights of the full OHSU community which, in turn, will support rebuilding institutional trust and moving OHSU closer to its goal to become a trauma-informed culturally responsive organization.

### 4. ASSESSMENT AND LOOK AHEAD

The work of the two committees is gaining significant momentum, building on the trauma-informed foundation that has been carefully constructed over the past several months. Looking ahead, the ongoing bi-directional review of the first two SBARs should result in the development of revised proposals that meet the approval of both committees in June. These two proposals — to realign the AAEO and centralize report tracking — will then be moved into the execution phase in which scope, budgets and timelines will be developed.

The process used to develop, review and revise these two SBARs will now be deployed and replicated to meet the remaining Covington recommendations. At least four trauma-informed SBAR proposals are under development by the Implementation Committee and will be provided to the Oversight Committee members in June for input and feedback reflecting the perspectives of the cohorts they represent.

The Implementation Committee is working thoughtfully and efficiently in developing the initial SBARs and the co-chairs have demonstrated a keen understanding of the importance of trust-building between it and the Oversight Committee. The outcomes of the review/revision process of the first two SBARs now underway and the manner in which the feedback from the Oversight Committee is received and integrated (or explained why not) by the Implementation Committee will be a crucial determinant in next steps of the collaborative process.

The focus on transparency through regular and varied communications will continue in June. The accountability framework (dashboard) will launch, and information about this new tool will

be shared across OHSU. A second drop-in forum will be held on June 23, completed SBARs will be posted to the O2 website, and the co-chairs will provide a status report to the OHSU Board of Directors at their public meeting on June 24. Work to expand the communications framework to provide specific details regarding changes to policies, procedures or practices resulting from meeting the Covington recommendation and how they affect OHSU members will be completed.

The Oversight Committee members will also return to the review of their committee charter in June. This review was deferred from May due to the workload associated with reviewing the inaugural two SBARs.