

August 2022

Culture Change at OHSU

Responding to the recommendations
in the Covington Report

A six-month report to the OHSU community



What we do here today could change everything about tomorrow.

President Danny Jacobs and the Board of Directors intend for OHSU to become a national leader in creating a university environment where all feel welcome and safe.

Responding to the 45 recommendations outlined in the Covington Report is part of meeting this goal. The recommendations are a blueprint to redesign policies, procedures and systems so they support safety and belonging for OHSU employees and learners.

The culture change work is grounded in the idea that *how we change is as important as what we change*. Transparency and accountability are cornerstones of OHSU's response. This interim report gives an update on the work — the people, the process and the outcomes — plus next steps.

How will OHSU know when it has created a university environment where everyone feels welcome and safe?

Carefully tracking — and reporting — on progress meeting the Covington recommendations is one way we will know. Using this metric, substantial progress has been made. OHSU has:

- Established a two-committee framework that empowers OHSU members to shape how the recommendations are met.
- Developed and deployed a process to meet the recommendations guided by trauma-informed principles (see the "Principles" box and page 9).
- Launched a nationwide search for a new Executive Vice President for Human Resources/Chief People Officer — a key Covington recommendation.
- Identified the 31 specific proposals needed to meet the recommendations.
- Developed 14 of the 31 proposals and set a target to develop 4 additional ones each month.
- Received approval to move two of the 14 into the project execution phase.
- Launched two websites and an "accountability dashboard" so anyone, anywhere can track progress of and engage in the work alongside both committees.

These measurable outcomes, along with others described later in this report and others still to come, are important. They establish a foundation on which to sustainably transform OHSU's institutional culture and they demonstrate that the process is working, as outcomes accelerate. But simply meeting the recommendations is not the point.

Rather, creating a university environment where all feel welcome and safe will happen only when OHSU members report consistently positive experiences with the redesigned policies, procedures and systems now being put in place. This will take time and, undoubtedly, adjustments along the way.

Even when OHSU reaches this point — which we will — the work to be a national leader in creating an environment where everyone feels welcome and safe will remain, by definition, always unfinished. Evolving our culture does not have an end date — it is our ever-present shared work to do and be better.

The principles of trauma-informed systems change

- Ensure physical and psychological safety
- Be transparent in decision-making to build trust
- Offer mutual support in healing and recovery
- Acknowledge and manage power dynamics
- Lift community voices and highlight individual and collective strengths
- Recognize and address overt discrimination, implicit bias, racism and historical trauma, accounting for cultural, historical and gender factors

(Adapted from the *Substance Abuse Mental Health Services Administration*)

The 45 Covington recommendations — background

In March 2021, OHSU announced it would voluntarily undertake an external review with the goal of exposing “any and all frailties and barriers that prevent us from being a trauma-informed, multicultural and anti-racist institution, free of discrimination or harassment.”

OHSU retained the law firm Covington & Burling LLP (“Covington”) to lead the investigation of OHSU's culture, and also asked Covington to provide recommendations for addressing its findings. Eight months later, OHSU received the Covington Report with 45 recommendations to serve as a “blueprint to drive positive change.”

The recommendations fell into three categories: Tone from the Top, Resources and Staffing, and Policies and Procedures. A few recommendations were discrete and could be met by responsive administrative action, but most were broad and contained multiple sub-recommendations that in some cases were overlapping.

The people

OHSU received the Covington Report in December 2021. It included 45 recommendations to serve as a “blueprint to drive positive change.”

There were any number of ways to meet the 45 recommendations contained in the report. For example: the recommendation that OHSU undertake a nationwide search for a new senior leader for human resources. What attributes should OHSU seek in that new leader? Or the recommendation that OHSU develop an institution-wide diversity, equity and inclusion vision. How could such a vision be created to best include and reflect the views of OHSU members most affected by it?

It was clear that these answers could only come from OHSU members. Meeting the recommendations had to prioritize the voices and views of OHSU members if this was to lead to meaningful and long-lasting change. But how?

In January 2022, President Jacobs established a two-committee framework — Implementation and Oversight — to empower OHSU members in the response process.

First, President Jacobs invited four people with demonstrated leadership, change management experience and trauma-informed systems change expertise to serve as co-chairs of the two committees (see “The Committee Co-chairs” box).

Then, Implementation Committee members were selected by President Jacobs from the ranks of OHSU leaders and managers — experienced experts on the policies, procedures and systems called out in the Covington recommendations, including federal and state regulations or laws that had to be considered. The 13 (plus two co-chairs) executives and academic leaders on the Implementation Committee were given the authority to develop and execute plans to meet the recommendations.

Next, the Oversight Committee members were nominated by groups across OHSU to represent them — employee resource and affinity groups, unions,

the student council, the faculty senate, schools, the professional board, and others. Six of the 36 committee seats were reserved for self-nominated at-large members (192 applications were submitted for these six seats).

The 36 (plus two co-chairs) Oversight Committee members were given the authority to monitor and provide input to the work of the Implementation Committee, drawing both on their first-hand experiences interacting with the policies, procedures and systems that were being redesigned, and inviting regular feedback as well from their stakeholder groups. In this way, the deepest and widest possible breadth of OHSU members would be involved in reshaping the institutional culture.

Project management, communications and administrative staff were assigned to support the work of the committees. The Implementation Committee convened its first meeting in January 2022 and now meets twice a month, on the second and fourth Thursdays. The Oversight Committee held its first meeting in February and meets monthly on the second Thursday. Significant work happens in-between meetings for both committees.

The committee co-chairs



Implementation Committee co-chair **Alice Cuprill Comas, J.D.**, is OHSU's executive vice president and general counsel. She serves as the chief legal counsel to the university's board, president and other senior executives.

"This is not a transactional process. This is a body of work that will change the culture of this institution and frankly the most important work of my career."



Implementation Committee co-chair **Susan Bakewell-Sachs, Ph.D., R.N., FAAN**, has been vice president for nursing affairs, and a professor and dean of the OHSU School of Nursing since 2013.

"Real change requires we break patterns and upset traditional power dynamics, and that's exactly what we intend to do."



Oversight Committee co-chair **Alisha Moreland-Capuia, M.D.**, is a faculty member at Harvard Medical School and OHSU School of Medicine, the former medical director of the OHSU Avel Gordly Center for Healing, and the founder and director of McLean Hospital's Institute for Trauma-Informed Systems Change.

"A trauma informed organization is a safer, better organization."



Oversight Committee co-chair **Michael Alexander, M.S.S.**, is the former president of the Urban League of Portland and serves as vice president of the Port of Portland Commission, board chair for the Black United Fund, and secretary of The Albina Vision Trust.

"Community grows when we plant trees whose shade we may never see."

The process

The Covington investigation and report brought into sharp focus the challenges some people experienced at OHSU related to inequitable treatment, discrimination, harassment, bullying, intimidation and retaliation.

Recognizing the need for healing and to avoid inadvertently recreating elements of the very environment OHSU was seeking to change, President Jacobs instructed the two committees to approach their work relying on six trauma-informed principles:

- Ensure physical and psychological safety
- Be transparent in decision-making to build trust
- Offer mutual support in healing and recovery
- Acknowledge and manage power dynamics
- Lift community voices and highlight individual and collective strengths
- Recognize and address overt discrimination, implicit bias, racism and historical trauma, accounting for cultural, historical and gender factors

(Adapted from the *Substance Abuse Mental Health Services Administration*)

Aligned with these six principles, the first undertaking of the committees was to work together to establish an environment of safety and trust. To do this, they focused on one high-priority recommendation to test and refine a trauma-informed model for their work — recruit an Executive Vice President for Human Resources/Chief People Officer. This position had been vacant or filled with interim appointees for several years.

A typical sequence for senior recruitments in an academic organization is to develop a “position description” outlining the roles and responsibilities. At OHSU, a senior position description is usually developed within the department of human resources and circulated among leaders for revision and, eventually, approval. After this, a search is launched.

This time, the Implementation Committee, which includes human resources representatives, developed a position description for the new executive vice president role and then sent it to the Oversight Committee members for input.

The Oversight Committee members reviewed it, asked questions, shared it with their stakeholder groups, asked more questions, marked it up and sent it back to the Implementation Committee for revision. The Implementation Committee made the requested changes or explained why they could not be made, and then created a new version. This back-and-forth peer review process continued for more than a month, and each time, new insights and observations helped to improve both the collaborative process and the position description.

After three rounds of review and revisions, the Oversight Committee approved the position description. A nationwide search was launched in April 2022. The input from the Oversight Committee members resulted in a higher probability that the recruited leader would be aligned with OHSU community expectations.

This process was an example of the six trauma-informed principles in action — it was mutually respectful; the power dynamics were shifted/shared between OHSU leadership and OHSU members (as represented on the Oversight Committee); and it was transparent in how decisions were made regarding the position description.

This process also provided a model for how the two committees could work together to meet all the Covington recommendations. Instead of a position description, however, the Implementation Committee would develop trauma-informed proposals to meet the recommendations and then share each with the Oversight Committee for input and approval.

The committees adopted a template to guide proposal development. This customized SBAR (Situation, Background, Assessment, Recommendation) template gave structure to the contents and allowed for comparison across proposals.

With this work complete, by the close of April, a three-step process was in place to respond to the Covington recommendations that would allow OHSU member perspectives to shape the outcomes. Embedded in each step are the principles of trauma-informed change.

- First, provisional plans (proposals) to meet one or more recommendations are developed by Implementation Committee members and then submitted to the full group for discussion and refinement. After this group agrees on the elements, these proposals are then shared with the Oversight Committee.
- Second, relying on their own experiences and invited perspectives from stakeholder groups, Oversight Committee members make suggestions for how to revise (if needed) a first-round proposal, and return it to the Implementation Committee where a new version is developed based on this input. This back-and-forth process continues until the Oversight Committee approves a proposed plan. There is no fixed number of times a proposal moves between the two committees, but the target is to develop and review four proposals each month.
- Third, after a proposal is approved in the Oversight Committee (by majority vote), the Implementation Committee develops a workplan — scope, budget, timeline, responsible parties and more — to execute on the approved proposal. The Oversight Committee also monitors and provides input into these workplans.

How are the SBAR proposals trauma-informed?

All proposals to meet the recommendations include responses to four Diversity, Equity, Inclusion and Belonging, or DEIB, questions:

1. How will this action/activity/effort better help us understand the experiences of those who have experienced overt discrimination, implicit bias, racism and historical trauma and account for cultural, historical and gender factors?
2. How will this action/activity/effort help improve the experiences for those who have experienced overt discrimination, implicit bias, racism and historical trauma and account for cultural, historical and gender factors?
3. How will this action/activity/effort help improve transparency and ensure leadership's accountability for changing organizational behaviors and patterns that disproportionately negatively impact those who have experienced overt discrimination, implicit bias, racism and historical trauma and account for cultural, historical and gender factors?
4. How will we ensure evaluation and continuous improvement?

The outcomes

During their first two months (February and March), the committees worked to develop the trauma-informed process to guide their collaboration.

While this work was ongoing, parallel efforts were underway in the Implementation Committee to categorize all the Covington recommendations into “like” groups, based on what/who they affected, how they overlapped, how they would be operationalized and what work was already underway at OHSU to meet them.

During this same period, a communications infrastructure was put into place to meet the commitment to transparency and accountability. A dedicated intranet (O2) website was created with information regularly posted that tracks the full extent of the response work. A corresponding public-facing website to reach the broader OHSU community, including alumni, prospective students and employees, and others was also established.

By the close of April, four more outcomes had been realized:

1. The recommendation that OHSU re-open recruitments to include external candidates as one tactic to increase diversity was met by administrative action.
2. The national search for a new Executive Vice President for Human Resources/Chief People Officer was formally launched.
3. The trauma-informed collaborative process to develop proposals to meet all the Covington recommendations was finalized and ready to be deployed.
4. The Implementation Committee identified the 31 proposals needed to meet the full suite of Covington recommendations. (Note: Meeting the recommendations is not a 1:1 proposition, because some are overlapping, hence the need for fewer proposals than the listed recommendations.)

In May, the work pivoted from developing the foundation on which to complete the culture change work to developing and executing on the 31 proposals.

As of August, the Implementation Committee has developed 14 of the 31 proposals. Of these, two have gone through the full review/revision process and have been approved by the Oversight Committee, the review for another four by the Oversight Committee is underway, the review of four additional proposals began in August, and four more are being finalized within the Implementation Committee to be shared in September. The titles and status of these proposals are listed below:

Status and titles of proposals

Approved by the Oversight Committee

- Realign the office of Affirmative Action and Equal Opportunity (AAEO)
- Develop a consolidated data repository and centralized reporting system

Undergoing review/revision between the two committees

- Update harassment, discrimination and retaliation policies
- Clearly define and communicate the roles and responsibilities for the OHSU Center for Diversity & Inclusion (CDI)
- Continue to conduct regular employee engagement surveys
- Revise, finalize and communicate the proposed disciplinary matrix

Submitted for Oversight Committee input in August

- Develop and communicate a strategic diversity, equity and inclusion vision for the organization
- Increase the number and diversity of AAEO investigators
- Centralize human resources staff and function
- Formalize CDI collaboration with other OHSU DEI-focused functions

To be submitted for Oversight Committee input in September

- Develop goals to support the DEIB (Diversity, Equity, Inclusion, Belonging) and anti-racism vision and strategy
- Reduce the complexity of reporting channels
- Provide clear, robust communications highlighting prohibitions against retaliation
- Develop and communicate a standardized, comprehensive investigations policy

Workplans are now being developed for the two proposals approved by the Oversight Committee — *Realign the office of Affirmative Action and Equal Opportunity (AAEO)*; and *Develop a consolidated data repository and centralized reporting system*. Sequencing of the remaining 17 of the 31 proposals needed to meet all the Covington recommendations has been determined, and development work is ongoing with a target to develop four new proposals each month.

Throughout this time, the commitment to transparency continued to be a priority. In addition to regular all-OHSU updates, in May, the first of an ongoing series of drop-in forums hosted by President Jacobs was held. All OHSU members were invited to ask questions and share feedback. In June, the “accountability dashboard” was launched. This tool links every Covington recommendation with the responsive proposal and provides information on proposal status, sequencing and responsible units.

By the numbers

2	Committees overseeing the Covington response work — Implementation and Oversight
13	Members of the Implementation Committee (+2 co-chairs) selected by President Jacobs who develop trauma-informed plans to meet the recommendations
36	Members of the Oversight Committee (+2 co-chairs) selected by groups across OHSU and by self-nomination who review/revise the proposals
1	Trauma-informed process developed by the committees to respond to the recommendations
45	Covington recommendations ; some overlap and others have sub-recommendations
1	Nationwide search underway for Executive Vice President of Human Resources/Chief People Officer (1 of the 45 Covington recommendations)
31	Proposals needed to meet the other 44 recommendations
14	Proposals now in development /under review
4	New proposals targeted for development each month
4	Weeks (approx.) needed by the committees to collaboratively review/revise each proposal
2	Websites for the OHSU community to learn about the response work
1	Accountability Dashboard , tracking progress for each recommendation, updated monthly

Next steps

With the committee process now in place, the work responding to the Covington recommendations will accelerate in the coming months. The two committees will continue to collaborate to finalize the 31 proposals identified as needed to meet the Covington recommendations. When approved, these proposals will move into the execution phase, with corresponding workplans covering scope, budget, timeline and responsible parties detailed.

Communications to OHSU members will increase as policies, procedures and systems are redesigned, and to share stories about the committee members and the work they have undertaken together. As policy changes begin to take practical effect, plans will be developed to monitor their effectiveness at achieving what they are intended to do — support OHSU members — and this information will be communicated as well.

The Covington response work will continue until the President and Board of Directors judge the work outcomes to be sufficiently embedded in the institutional culture. When this occurs, or possibly before as OHSU members' confidence that the institution has been accountable to meeting the recommendations grows, the "Covington" adjective will be retired. At that time, this work will appropriately become part of broader culture change efforts. The trauma-informed systems change model developed by and customized for OHSU by the two committees will be foundational for ongoing and future efforts.

The Covington recommendations provide the floor, not the ceiling for how OHSU can continue to transform its institutional culture; our evolution does not have an end date. We will always have more work to do. But it will become easier (or more manageable) because of the hard work being put into this response today, because of the knowledge and experience we are gaining about how to build and sustain a trauma-informed inclusive culture.

OHSU will become a national leader in creating a university environment where all feel safe and welcome.

For more information, committee rosters, stakeholder groups represented, access to the accountability dashboard and more, please visit [Living our Values at OHSU](#) on the OHSU website.

In addition to the vital efforts of committee members and others across OHSU, this culture change work benefits from the specific contributions of Wayne Shields, Kathleen McFall, Jadwa Sbait, Krista Klinkhammer and Jeffrey Martin. David Riofrio and Megan Pugmire designed this report.

A timeline of Oversight and Implementation Committee work

December 2021

- Eight-month investigation into OHSU's institutional culture concludes.
- OHSU releases the full un-redacted "Covington Report."
- President, Board of Directors commit to culture change.

January 2022

- OHSU establishes two-committee framework to respond to recommendations.
- Committees charged with developing a trauma-informed, inclusive collaborative process.
- President Jacobs appoints co-chairs for committees and 13 Implementation Committee members, gives authority to fulfill recommendations.
- 36 Oversight Committee members selected by university groups, schools, councils, others; President Jacobs charges them with authority to provide input and monitor Implementation Committee.
- Committee staff assigned.
- Implementation Committee convenes its first meeting.
- Implementation Committee co-chairs update the board at their public meeting.

February 2022

- Oversight Committee holds its first meeting, trauma-informed systems change concepts introduced.
- Implementation Committee considers tactical options for collaborating with Oversight Committee.
- Four committee co-chairs begin weekly meeting schedule to facilitate collaboration.
- Co-chairs begin weekly briefing protocol with President Jacobs.
- Communications strategy is developed, including two new websites, to ensure transparency of process.
- First monthly progress reports from both committees submitted to President Jacobs and the board.

March 2022

- Oversight Committee members establish community standards, decision-making protocols and discuss how to measure accountability.
- Committees pilot a shared decision-making/feedback process to co-develop a position description for recruiting an HR Executive Vice President — a key Covington recommendation.

- The pilot informs the development of a trauma-informed process to respond to all recommendations using a modified Situation/Background/Assessment/Recommendation (SBAR) proposal template.
- The recommendation to re-open hiring to external candidates as a tactic to improve diversity is met by administrative action.

April 2022

- Oversight Committee approves the position description for the EVP of HR; a nationwide search is launched.
- Implementation Committee identifies 31 SBARs needed to meet all 45 Covington recommendations; begins development of first two SBARs (Realign the AAEO and Develop a Consolidated Data Repository and Centralized Reporting System).
- Format for “Accountability Dashboard” finalized — links all recommendations to corresponding SBAR
- Both committee co-chairs update the board at their public meeting.

May 2022

- Implementation Committee submits first two SBARs to Oversight Committee and bi-directional review/feedback process begins.
- Implementation Committee initiates development of four more SBARs.
- Oversight Committee invites feedback on first two SBARs from their OHSU stakeholders and sends first round of input to Implementation Committee.
- Implementation Committee integrates feedback and revises SBARs, sends back to Oversight Committee.
- Oversight Committee reviews revised SBARs and provides a second round of feedback.
- Implementation Committee finalizes next set of four SBARs and revises first two a second time.
- President Jacobs holds first open forum for all OHSU members.

June 2022

- Accountability Dashboard is launched, providing ability for anyone to track work.
- Oversight Committee approves two revised SBARs; Implementation Committee begins development of project execution workplans.

- Four new SBARs are submitted to the Oversight Committee for review; first round of feedback sent back to Implementation Committee, four proposals are revised.
- Committees agree to develop/review four SBAR proposals per month as an initial target.
- Implementation Committee works on next set of four SBARs.
- President Jacobs holds second open forum.
- Committee co-chairs update the board at their public meeting.
- OHSU FY 2023 budget calls out line items for meeting Covington recommendations.

July/August 2022

- Bi-directional committee review and revision of SBARs continues.
- Committee co-chairs present update to OHSU all-managers meeting.
- Oversight Committee members conduct a six-month review; some enhancements are adopted.
- The SBAR process as a conduit between the two committees to meet the recommendations is judged to be working; sequencing for SBAR development/review is established for next six months.

