

FALL 2025

OHSU Addendum Report

Prepared for the Northwest Commission on Colleges and Universities

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Introduction

On March 5, 2025, OHSU received a formal notification letter from NWCCU requesting an Addendum to accompany the institution's 2025 Mid-Cycle report¹. This formal letter follows an email correspondence in late 2024 between then NWCCU President Sonny Ramaswamy and OHSU Interim President Steve Stadum² where NWCCU identified concerns about OHSU's compliance with NWCCU Standards, Eligibility Requirements, or Policies. The concerns originally identified by NWCCU were categorized under three groupings:

1. Clarification regarding institutional responses to complaints, particularly regarding discrimination or sexual harassment. (Standard 2.D.2)
 - a. How will OHSU ensure that student complaints especially related to discrimination, sexual harassment/Title IX will be processed in a fair, timely, and equitable manner?
2. Clarification regarding equitable treatment of constituents, including administrators. (Standard 2.D.2)
 - a. What measures will OHSU take to ensure that administrators are held accountable, but treated in a fair and equitable manner?
3. Clarification on sufficiency and training of staff in critical departments (Standard 2.F.3)
 - a. What measures will OHSU adopt to ensure that critical departments such as the Title IX office are sufficiently staffed to allow timely processing of student complaints?
 - b. What measures will OHSU adopt to ensure proper training of staff that process student complaints

The NWCCU concerns stemmed from the receipt of unsolicited information³ regarding two external investigations, the Covington and Schneider Reports, regarding sexual misconduct, discrimination, and the handling of related complaints. OHSU commissioned two external, independent firms to assess the institutional culture at OHSU and identify opportunities for institutional improvements, such as policy clarification and alignment, process for addressing complaints, the length of investigations to ensure they are handled in a timely manner, and appropriate staffing resources. In its letter from March 5, 2025, NWCCU requested OHSU articulate its adherence with its own policies to ensure the institution is compliant with NWCCU 2020 Standard 2.D.2. through an Addendum to OHSU's Mid-Cycle review in fall 2025 as well as host an additional focused evaluator for the on-campus site visit to review the issues raised by the unsolicited information.

OHSU, as an institution of learning, service, health, and healing, maintains the highest ethical standards (Eligibility Requirement 8 – Institutional Integrity) and is compliant with NWCCU 2020 Standards 2.D.2 and 2.F.3, as detailed in the responsive sections of this Addendum. OHSU has

¹ Appendix 1: March 5, 2025 - NWCCU Addendum expectation on compliance with Standard 2.D.2

² Appendix 2: December 9, 2024 - OHSU response to NWCCU inquiry on compliance

³ <https://nwccu.app.box.com/s/euhfojhry7ye7u0vhgyu01701kd8ve5d>

established multiple [integrity offices](#)⁴ at the institution, maintains comprehensive policies, conducts regular trainings, has an [OHSU Code of Conduct](#)⁵, and appoints investigative oversight entities to ensure that ethical expectations are maintained and followed. Since 2023, OHSU has reorganized its Affirmative Action and Equal Opportunity Office (AAEO) into the [Office of Civil Rights Investigations and Compliance \(OCIC\)](#)⁶ and established a new position, consisting of two roles, a vice president of the Office of Civil Rights Investigations and Compliance and OHSU Title IX coordinator, to adequately staff and train this office and address the concerns raised by the Covington and Schneider Reports. The personnel in OCIC receive appropriate and adequate training to address concerns and issues that may require investigations.

As stated in the March 5, 2025, NWCCU letter, the Commission has “...*determined that additional follow-up is necessary to evaluate the effectiveness of the policy and process changes in ensuring the institution’s compliance with NWCCU 2020 Standard 2.D.2.*” This Addendum addresses the three original categories of concerns identified by NWCCU and demonstrates that **OHSU is compliant with NWCCU 2020 Standards 2.D.2 and 2.F.3.** Furthermore, this Addendum elaborates on OHSU’s policy revisions and enactments that ensure effectiveness as well as describes strategic investments in personnel, trainings, and resources that document institutional process efficiencies.

⁴ <https://www.ohsu.edu/integrity-department>

⁵ <https://ohsu.ellucid.com/documents/view/13349/?security=27eb3b339b737a82cd48b3282cdd3be05e75d10e>

⁶ <https://www.ohsu.edu/office-of-civil-rights-investigations-and-compliance>

NWCCU 2020 Standard 2.D.2

Two of the original categories of concerns presented to OHSU by NWCCU focused on compliance with NWCCU 2020 Standard 2.D.2.

NWCCU 2020 Standard 2.D.2

The institution advocates, subscribes to, and exemplifies high ethical standards in its management and operations, including in its dealings with the public, NWCCU, and external organizations, including the fair and equitable treatment of students, faculty, administrators, staff, and other stakeholders and constituencies. The institution ensures that complaints and grievances are addressed in a fair, equitable, and timely manner.

NWCCU Concern 1 - Clarification regarding institutional responses to complaints, particularly regarding discrimination or sexual harassment. (Standard 2.D.2)

NWCCU's first concern around Standard 2.D.2 focused on OHSU's response to complaints, specifically complaints regarding discrimination or sexual harassment. In his December 9, 2024, response to NWCCU, Interim President Stadum provided the applicable OHSU policy and identified the OHSU office responsible for addressing complaints regarding discrimination or sexual harassment. To provide a more thorough narrative to address NWCCU's concerns and reiterate how OHSU is in compliance with NWCCU Standard 2.D.2, a more detailed and robust portrayal of OCIC is described below, including its leadership, policy oversight, significant achievements since its establishment, and transparency in reporting of data.

OCIC Leadership

To further address responses to complaints regarding discrimination or sexual harassment, OHSU established OCIC in June 2023⁷. OCIC is led by Ms. Angela Fleischer, M.S.W., LCSW, CFP-A, the inaugural vice president of the Office of Civil Rights Investigations and Compliance (OCIC) who also serves as the OHSU Title IX coordinator. To facilitate independence and reinforce OHSU's commitment to ethical standards, this position reports directly to the OHSU President. This office is appropriately staffed and provides support to OHSU students, employees, and the entire OHSU community, and addresses reports of discrimination, harassment, retaliation, and sexual misconduct. All reports, including those made through the online [Integrity Helpline form](#)⁸, are addressed by OCIC. Additionally, OCIC is responsible for advising, reviewing, and investigating concerns related to discrimination, harassment, and retaliation based on protected characteristics, including incidents of sexual misconduct. OCIC is also responsible for Americans with Disabilities Act (ADA) and civil rights compliance. OCIC serves the entire institution, both students and employees.

In addition to the vice president of the OCIC and OHSU Title IX coordinator, OCIC staff providing support to the OHSU community include:

⁷ OCIC was formerly known as the Office of Affirmative Action and Equal Opportunity (AAEO) at OHSU.

⁸ <https://secure.ethicspoint.com/domain/media/en/gui/18915/index.html>

1. The Prevention and Education Team, initiated March 2024, which is charged with educating the institution regarding reporting responsibilities and options, providing information about the reporting and investigation process, and facilitating informal resolutions to reports of concern.⁹
2. The Confidential Advocacy Program for Employees (CAPE)¹⁰ which serves all employees, graduate researchers, post-docs, and individuals receiving compensation from OHSU in support, information gathering and navigation of processes. CAPE also provides confidential advocacy related to bias, discrimination, harassment, retaliation, and interpersonal violence.
3. An ADA coordinator for the institution, who is responsible for institutional compliance with the ADA, including providing consultation for [OHSU Accommodations](#)¹¹ and the Employee Leaves and Accommodations team. The ADA coordinator is currently leading a 5-year physical assessment analysis to update the institution's ADA Compliance and Accessibility transition plan to ensure adherence with state and federal requirements.¹²
4. A team of nine trained investigators and compliance officers who assess concerns and conduct investigations affecting all members of the OHSU community, including students, faculty, and staff. This includes three new confidential intake specialists, who help navigate resources¹³, provide supportive measures¹⁴, and serve as a guide through institutional processes.

Since June 2023, OHSU has made concerted efforts to ensure that complaints and grievances are addressed in a fair, equitable, and timely manner, by investing in additional staff for OCIC to ensure that investigations are completed in a timely manner. OCIC has increased its personnel from 12 to 19 staff from 2023 to 2025. This institutional investment has reduced the timing of investigations to a consistent average of less than 60 days, a vast improvement over previous investigation durations

⁹ The *OCIC Prevention and Education Efforts* (July 30, 2025) provides a list of initiatives provided by the Prevention and Education Team from March 2024 to June 2025 and is available in the NWCCU Box folder and on site

¹⁰ Appendix 3: OHSU's CAPE internal O2 webpage.

¹¹ <https://www.ohsu.edu/office-of-civil-rights-investigations-and-compliance/accommodations>

¹² Presentations and updates were provided to the OHSU Board of Directors at the [January 30, 2025](#) and [June 27, 2025](#) meetings.

¹³ Confidential resources include (an example handout Appendix 6):

Students – Confidential Advocacy Program (CAP)

Employees – Confidential Advocacy Program for Employees (CAPE)

Additional and Off-Campus resources are available through OCIC

¹⁴ Supportive measures may include, but are not limited to: referral to counseling and health services for students or to the Employee Assistance Program; short-term alterations to work schedules, locations, or arrangements for employees; providing campus escorts; providing translations services; providing academic support and/or reasonable accommodations; and offering other temporary adjustments to work schedules, academic deadlines, course schedule, etc. (*OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status*, pg. 19) and identified in *OHSU Policy 03-05-048 – Discrimination, Harassment and Retaliation*, section 6.A.

that were averaging between 18 and 24 months¹⁵. This investment demonstrates that OHSU has addressed NWCCU's first expectation that complaints and grievances are processed *in a fair, timely, and equitable manner* as well as addressed NWCCU's third expectation that the *Title IX office is sufficiently staffed to allow for timely processing of student complaints* (Standard 2.F.3).

Policy Compliance

OHSU does not tolerate any forms of prohibited discrimination, harassment, sexual misconduct, or retaliation in compliance with NWCCU Standard 2.D.2. OHSU follows [Policy No. 03-05-048: Discrimination, Harassment and Retaliation](#)¹⁶, which defines prohibited discrimination, harassment (including sexual harassment), and retaliation; outlines reporting options and obligations; and describes the investigation process for complaints or reports of discriminatory misconduct. This policy undergoes regular review to ensure appropriateness and relevancy and was last reviewed and revised in 2023.

It is OHSU's policy to maintain an environment free of discrimination against any person because of their real or perceived "protected characteristic." If the university finds that an OHSU member has engaged in discriminatory misconduct under this policy, it will take **immediate and appropriate corrective action** (Standard 2.D.2). Students who have engaged in discriminatory misconduct face sanctions up to and including suspension or dismissal. Employees who have engaged in discriminatory misconduct face discipline up to and including termination. ***Any form of prohibited discrimination, harassment, including sexual harassment and sexual misconduct, and retaliation are not tolerated at OHSU.***

The *OHSU Discrimination, Harassment and Retaliation Policy* applies to conduct that:

1. occurs on campus or property owned or controlled by OHSU;
2. occurs in the context of an OHSU employment or educational program or activity;
3. uses OHSU resources, such as telephones, computers, video conferencing technology, e-mail, or other means of electronic communication; or
4. creates a hostile environment for, or causes substantial disruption to, the OHSU community or any of its members (Standard 2.D.2 – Institutional Integrity - "high ethical standards in its management and operations").

¹⁵ The investigations process is a specific neutral, fact finding process identified in the *OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status*, pg. 30 and this timeframe does not include the initial intake process. Materials are available in the NWCCU Box folder and on site.

¹⁶ <https://ohsu.ellucid.com/documents/view/20808/?security=03143029b17a771da4235e45dc8514fcfbbbc430>

Furthermore, the *Discrimination, Harassment and Retaliation Policy* is explicit in defining acts of violence, including sexual and domestic violence as well as retaliation. The policy also provides avenues for filing reports and accessing [confidential resources](#)¹⁷ and support, including:

- [Office of Civil Rights Investigations and Compliance \(OCIC\)](#)
- [Law enforcement](#)¹⁸
- Confidential resources
 - [Student Health and Wellness Center](#)¹⁹
 - [Resident and Faculty Wellness Program](#)²⁰
 - Employee Assistance Program
 - [Confidential Advocacy Program](#)²¹
 - Confidential Advocacy Program for Employees (CAPE)²²
 - University Ombuds²³
 - External agencies

The policy also articulates the expectations of all OHSU members when notified of discriminatory misconduct as well as the institution's response to discriminatory misconduct. OHSU adheres to and follows state and federal law, OHSU policies, and any applicable collective bargaining agreements (Standard 2.D.1 – Institutional Integrity - “The institution represents itself clearly, accurately, and consistently through its announcements, statements, and publications”). A reporting party's options, and an anticipated timeline, will be explained to that person by OCIC, Human Resources, or the applicable student office, as appropriate.

Aligned with the *OHSU Discrimination, Harassment and Retaliation Policy*, and further clarifying OHSU's response to complaints specifically regarding discrimination, harassment, sexual misconduct, and retaliation, is the *OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status* (hereafter referred to as *DHR Manual*).²⁴ This *DHR Manual*, written by OCIC for the OHSU community, stipulates key definitions and consistent and equitable processes that OHSU follows when responding to reports about discrimination, harassment, sexual misconduct, or retaliation. Additional topics addressed in the *DHR Manual* include reporting

¹⁷ A listing of the following confidential resources can be found at: <https://www.ohsu.edu/office-of-civil-rights-investigations-and-compliance/get-confidential-support> and in Appendix 6.

¹⁸ <https://www.ohsu.edu/public-safety/ohsu-police>

¹⁹ <https://www.ohsu.edu/education/student-health-and-wellness>

²⁰ <https://www.ohsu.edu/school-of-medicine/resident-and-faculty-wellness-program>

²¹ <https://www.ohsu.edu/confidential-advocacy-program>

²² Appendix 3: OHSU's CAPE internal O2 webpage.

²³ Ombuds do not have a legal privilege of confidentiality, and their information could be subpoenaed in a court of law, but under their professional code of ethics the Ombuds must take steps to avoid, whenever possible, disclosure of confidential records and information

²⁴ *OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status* is available in the NWCCU Box folder and on site.

avenues, support measures²⁵, OHSU's resolution procedures, remedial measures and sanctions, appeals, and trainings. The manual also dictates how the *Discrimination, Harassment and Retaliation Policy* and the *DHR Manual* are distributed to the OHSU community.

Significant Achievements by OCIC

In addition to the marked decreased investigation time ensuring the timely processing of complaints, OCIC has accomplished a number of additional key initiatives that have improved the efficiency and effectiveness of responding to complaints around discrimination or sexual harassment (Standard 2.D.2). Key results, such as the hiring of a vice president of OCIC and OHSU Title IX coordinator in 2023 as well as increasing the number of trained staff and compliance investigators, have been achieved. OCIC also initiated a robust prevention and education campaign to ensure broader institutional awareness of discrimination, harassment, and retaliation since March 2024.²⁶ These accomplishments demonstrate how seriously OHSU has taken the responsibility to ensure that complaints and grievances are addressed in a fair, equitable, and timely manner.

One of the more significant and initial priorities of OCIC was to update OHSU's *Policy No. 03-05-048: Discrimination, Harassment and Retaliation*, which was accomplished in May 2023. This policy aligns with related OHSU policies and procedures as well as federal regulations and state statutes. Another critical project was the creation of the corresponding *DHR Manual* which was enacted on August 1, 2025. Table 1 provides a brief outline of key OCIC expectations and accomplishments since 2023.

²⁵ Supportive measures are identified in footnote 11 and available in *OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status* (pg. 19).

²⁶ *OCIC Prevention and Education Efforts*, (July 30, 2025) is available in the NWCCU Box folder and on site.

Table 1: OCIC Expectations and Status Updates

Expectations	2023 data	2025 goal	Accomplished/Addressing
Hire and retain a Vice President and Title IX coordinator	Position not established	Yes	Accomplished
Review and revise OHSU's Discrimination, Harassment and Retaliation Policy	In progress	Yes	Accomplished
Create a discrimination, harassment, sexual misconduct, and retaliation procedure manual to ensure compliance with due process expectations	Procedural manual not created	Yes	Accomplished
Establish a Standard Practice for Investigations into Misconduct Policy	Investigations manual not created	Yes	Accomplished
Increase the number of trained staff and personnel to address complaints	12	19	Accomplished
With increased staff, reduction of investigation time to less than 60 days ²⁷	600 days	under 60 days	Accomplished
Deliver a training to the institution in <i>Compass</i> on discrimination and harassment	Discrimination and harassment training not provided	All OHSU 93.9%	Accomplished and On-going annually
Conduct harassment prevention trainings for managers	Data was not being collected	All OHSU Managers 95.9%	Accomplished and On-going annually

²⁷ For investigation process see *OHSU Procedure Manual – Discrimination, Harassment, Sexual Misconduct, and Retaliation Based on Protected Status*, pg. 30. Materials are available in the NWCCU Box folder and on site.

OCIC Transparency

An important feature of NWCCU Standard 2.D.2 is the institution's dealings with the public including fair and equitable treatment of students, faculty, administrators, staff, and other stakeholders and constituencies. **OHSU demonstrates its compliance with NWCCU Standard 2.D.2** by providing transparent and accurate reporting to the [OHSU Board of Directors](#)²⁸ and the public on the work, investigations, and functions of OCIC. The vice president of OCIC and OHSU Title IX coordinator provides regular updates to the OHSU Board of Directors. Recent presentations and updates to the Board, at the [January 30, 2025](#)²⁹ and [June 27, 2025](#)³⁰ public meetings, detailed accomplished recommendations from the Schneider report, prevention and education status, and statistics on OCIC's total investigations for the 2023-24 fiscal year. Updates to the Board are key in keeping the OHSU community and the public informed.

In addition to complying with NWCCU Standard 2.D.2, requiring institutions to adhere to expectations with the public, OHSU complies with reporting expectations determined by Oregon Revised Statutes (ORS). The vice president of OCIC and OHSU Title IX coordinator ensures OHSU remains in compliance with state legislative requirements on sexual misconduct reporting and response as dictated by [ORS 350-335-346](#)³¹. OHSU's information on sexual misconduct reports received and the institution's response is publicly available through the [Higher Education Coordinating Commission](#)³². This reporting activity serves as an additional example of compliance with external entities while providing transparency on institutional cases.

OCIC Reporting

NWCCU Standard 2.D.2 has an expectation of fairness and accuracy in reporting complaints and grievances. By reporting accurate information regarding its grievances and complaints, particularly regarding discrimination or sexual harassment, **OHSU demonstrates its compliance with NWCCU Standard 2.D.2**. Figure 1 – OCIC Total Reports provides a graphic representation of both bias and discrimination reports as well as sexual misconduct and Title IX reports for the 2023-24 fiscal year. In FY 2023-24, OCIC received 659 total reports³³ with 71% (470 reports) dealing with bias and discrimination and 29% (192 reports) dealing with sexual misconduct and Title IX issues. Three reports were categorized in both bias and discrimination as well as sexual misconduct and Title IX.

²⁸ <https://www.ohsu.edu/about/board-directors>

²⁹ <https://www.ohsu.edu/sites/default/files/2025-01/COMBINED-GROUP-OHSU-PUBLIC-BOD-1-30-24.pdf>

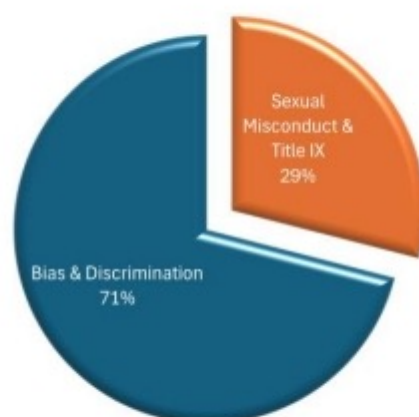
³⁰ <https://www.ohsu.edu/sites/default/files/2025-06/COMBINED-GROUP-OHSU-PUBLIC-BOD-6-27-25.pdf>

³¹ https://www.oregonlegislature.gov/bills_laws/ors/ors350.html

³² <https://www.oregon.gov/highered/about/pages/sexual-misconduct-reporting.aspx>

³³ For additional data, see the January 30, 2025, OHSU Board of Directors meeting identified previously.

Figure 1: OCIC Total Reports (2023-2024 Fiscal Year)



659 Total Reports

Of the 470 reports of bias and discrimination in FY 2023-24, 68 complaints resulted in formal reports, with 79% of the formal reports unsubstantiated, 19% substantiated, and 2% still in process. For the 192 reports of sexual misconduct and Title IX in FY 2023-24, 41 complaints resulted in formal reports, with 76% identified as unsubstantiated and 24% substantiated.

Preliminary data for 2024-25, which will be finalized in October 2025 and reported to the OHSU Board of Directors and to the State of Oregon, indicates approximately 500 total reports with an average time to close (from case creation to close) of under 60 days. OCIC's goal is to resolve every formal complaint within 120 business days (*DHR Manual*, pg. 27).

The process that outlines the resolution procedures is provided in the *DHR Manual in Chapter XI – OHSU's Resolution Procedures* (pg. 23-37). The two resolution procedures are informal resolution or formal resolution. When a report of discriminatory misconduct is made, the vice president for OCIC and OHSU Title IX coordinator promptly adheres to an intake process, which includes an initial evaluation of the report. If the conduct or behavior does not constitute a violation of OHSU's *Discrimination, Harassment and Retaliation Policy*, the report is removed from the *Discrimination, Harassment and Retaliation* investigatory process, and if applicable, the report is referred to the appropriate OHSU office, department, or administrator to assess if a resolution should be pursued in accordance with any other applicable OHSU policy, procedure, guideline, agreement, or handbook. If OCIC determines the report is a violation of OHSU's *Discrimination, Harassment and Retaliation Policy*, OCIC investigates the allegations and renders findings. After the investigatory process is completed, the vice president for OCIC and OHSU Title IX coordinator, or a decision maker if the vice president is unavailable, makes a final determination of remedial measure(s) and recommends the appropriate sanction(s). Sanctions are disciplinary consequences for violations of OHSU's *Discrimination, Harassment and Retaliation Policy*. To ensure consistent and equitable treatment for students, the appropriate recommendation(s) are sent to the dean of the student's school or when an employee is involved recommendation(s) are sent to OHSU Human Resources.

OCIC is the institutional department tasked with addressing complaints regarding discrimination or sexual harassment. OCIC is appropriately staffed, has effective leadership by the vice president of the

OCIC and OHSU Title IX coordinator, ensures violations are addressed, and provides guidance and support for individuals submitting complaints. Through the *OHSU Discrimination, Harassment and Retaliation Policy*, which is supported by the *DHR Manual*, OHSU provides all members of the OHSU community the appropriate guidance and consistent education around the institution's responses addressing discrimination, harassment, sexual misconduct and retaliation.

NWCCU Concern 1a. How will OHSU ensure that student complaints especially related to discrimination, sexual harassment/Title IX will be processed in a fair, timely, and equitable manner?

As described in the preceding section, OHSU, and specifically OCIC, ensures that student complaints related to discrimination, sexual harassment, and Title IX are processed in a fair, timely, and equitable manner, in compliance with the expectations established in NWCCU Standard 2.D.2. Additionally, as articulated in the *DHR Manual*, pages 30-31:

I. Investigations

The investigation is a neutral, fact-finding process. All investigations will be thorough, reliable, and impartial, and will seek the collection of witness and evidence directly or substantially relevant to whether the alleged policy violation occurred. Typically, this will entail interviews with relevant parties and witnesses, obtaining available evidence, and identifying sources of expert information, if necessary.

The VP OCIC/Title IX coordinator or designee is responsible for overseeing investigations to ensure timely resolution and compliance with Title IX and this procedure.

Both parties have the right to have an advisor/support person present at every meeting described in this section.

1. Trained Investigators

OHSU will investigate Formal Complaints fairly and objectively. Individuals serving as investigators under the Formal Resolution Procedure will have adequate training on what constitutes a violation of OHSU policy and this procedure, including sexual harassment for the purposes of Title IX (if applicable) and how OHSU's Formal Resolution Procedure operates. OHSU will also ensure that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence and complies with the Formal Resolution Procedure.

OCIC also requires that individuals designated to facilitate an investigation “will not have potential or actual bias or conflict of interest in the investigatory, hearing, sanctioning, or appeal process or bias for or against complainants or respondents generally” (*DHR Manual*, pg. 24). This reiterates OHSU's commitment to ensure a fair and equitable resolution to investigations involving both students and employees. In addition, in the last two years OCIC has moved from a single investigator model to a process where the decision maker is separate from the investigator in all cases, not just Title IX. This ensures there is no bias in the decision and provides the opportunity for investigators to collect and analyze facts, while the decision of policy violation is made by the Director of Investigations.

OHSU ensures that complaints and grievances are addressed in a fair, equitable, and timely manner in compliance with NWCCU Standard 2.D.2. OHSU has identified criteria for individuals conducting investigations to ensure equity and fairness. In many instances, the Prevention and Education team is leveraged to provide small group or departmental content in order to provide information and assistance to ameliorate the situation when it does not rise to the level of a policy violation.

NWCCU Concern 2 - Clarification regarding equitable treatment of constituents, including administrators (Standard 2.D.2)

In compliance with NWCCU Standard 2.D.2, OHSU provides equitable treatment to all students and employees, including administrators. As stipulated in the *DHR Manual*, OHSU defines investigations as “a neutral, fact-finding process. All investigations will be thorough, reliable, and impartial...” (pg. 30).

Additionally, the *DHR Manual* (pg. 5) identifies all applicable parties, which are governed by the manual and the *OHSU Discrimination, Harassment and Retaliation Policy*:

The procedures described in this DHR Manual apply to all students, staff, and faculty members. This includes unionized or other related categories of employees who are also subject to the terms of either any applicable collective bargaining agreements or other OHSU policies on employment...

The vice president of OCIC and OHSU Title IX coordinator reports directly to the OHSU President, in order to administer OHSU policies in an independent and neutral manner. (Eligibility Requirement 8 – Institutional Integrity)

*OHSU Policy 01-01-000 – Definitions and Interpretations*³⁴ and the *OHSU Code of Conduct* (pg. 7) reinforce who comprises the OHSU community and who needs to adhere to and abide by the *Code of Conduct* and all OHSU policies. OHSU members include:

- Members of the OHSU Board of Directors
- Employees
- Student and trainees
- Volunteers
- Visiting faculty, researchers and health care practitioners
- Contractors and vendors, while doing business with OHSU
- Others who work for or on behalf of OHSU

The *Definitions and Interpretations Policy* directly identifies “Unclassified Employees” who provide administrative and leadership functions at OHSU as well as administrative leaders as “Unit Leader” which includes positions such as: vice presidents, deans, directors, and department heads.

Another example of meeting NWCCU Concern 2 and compliance with NWCCU Standard 2.D.2 regarding equitable treatment, including administrators, is by fair treatment during investigations.

³⁴ <https://ohsu.ellucid.com/pman/documents/view/20724>

To ensure a fair and impartial process for investigations, OHSU established *Policy 01-50-025: Standard Practice for Investigations into Misconduct*³⁵ in 2023 and revised in January 2025. This policy outlines OHSU’s procedural commitment to:

1. eliminating, preventing, and addressing the effects of misconduct;
2. fostering an environment where all individuals are well-informed and supported in reporting misconduct;
3. providing a fair and impartial process, including required due process where applicable, for all parties in investigations into misconduct; and
4. identifying the general procedures by which alleged violations of OHSU policies involving misconduct will be evaluated.

This investigations policy also has an accompanying *OHSU Investigations Manual*³⁶ that provides guidance on best practices for investigations. This guide is a tool to help responsible offices effectuate thorough investigations in a fair, consistent, and effective manner and to enhance transparency of investigations for all parties involved. The *Investigations Manual* is a general guide for any area of OHSU conducting investigations, while the complimentary *DHR Manual* is utilized exclusively by OCIC to ensure the increased required elements of due process are maintained.

OHSU takes complaints of violations of its policies and the need to protect reporting parties from retaliation seriously. OHSU also takes seriously the rights of individuals accused of misconduct. Accused individuals are provided with a fair investigation process that includes notice of a complaint and an opportunity to be heard throughout the process.

OHSU maintains its compliance with NWCCU Standard 2.D.2 through consistent and reaffirmed messaging that OHSU’s policies, including the *Code of Conduct*, apply equally to all OHSU members, including administrators.

Concern 2a. What measures will OHSU take to ensure that administrators are held accountable, but treated in a fair and equitable manner?

To ensure OHSU administrators are held accountable and also treated in a fair and equitable manner, in compliance with NWCCU Standard 2.D.2, OHSU requires all OHSU members to comply with state and federal laws, the OHSU *Code of Conduct* and institutional policies and procedures. OHSU also complies with state and federal laws providing employment protections to ensure fair treatment in the workplace. As described earlier, the vice president of OCIC and OHSU Title IX coordinator reports directly to the OHSU President, in order to administer pertinent OHSU policies in an independent and neutral manner (Eligibility Requirement 8 – Institutional Integrity) and provides regular updates to the OHSU Board of Directors and the state of Oregon³⁷. This role is reaffirmed in the *DHR Manual* (pg. 5), “The VP OCIC/Title IX Coordinator acts with independence and authority and oversees all resolutions under this policy, free from bias and conflicts of interest...The procedures

³⁵ Appendix 4: Policy 01-50-025: Standard Practice for Investigations into Misconduct

³⁶ 2024 *OHSU Investigations Manual* is available in the NWCCU Box folder and on site.

³⁷ See OCIC Transparency section pg. 7-8.

described in the *DHR Manual* apply to all students, staff, and faculty members.” Additionally, in the *DHR Manual* (pg. 30), the vice president is responsible for overseeing investigations, which are to be conducted in a neutral, thorough, reliable, and impartial manner with all investigations to be fair and objective.

As stated on page 8 previously, the process that outlines the resolution procedures is provided in the *DHR Manual in Chapter XI – OHSU’s Resolution Procedures* (pg. 23-37). After the investigatory process is completed, the vice president for OCIC and OHSU Title IX coordinator, or a decision maker if the vice president is unavailable, makes a final determination of remedial measure(s) and recommends the appropriate sanction(s). Sanctions are disciplinary consequences for violations of OHSU’s *Discrimination, Harassment and Retaliation Policy*. OCIC does not have authority to mandate so to ensure consistent and equitable treatment for students, the appropriate recommendation(s) are sent to the dean of the student’s school and when an employee is involved recommendation(s) are sent to OHSU Human Resources.

Additionally, through the OHSU annual review process called GROW³⁸ OHSU’s leaders and administrators articulate expected behavioral goals consistent with the position and job responsibilities. Employees identify and comment on the behavioral expectations of their position and supervisors are required to meet with employees to have direct conversations regarding adherence to OHSU policies and the *Code of Conduct*. This annual self-assessment and manager feedback review, combined with OHSU’s training requirements (beginning on pg. 13) reinforces expected behaviors and conduct for OHSU leaders. This demonstrates a continued channel of communication ensuring all employees, including those in leadership roles, are held accountable and treated equitably.

Maintaining its independent and neutral manner to ensure investigations are free from bias and conflicts of interest, OCIC plays a vital role to protect the equitable treatment of all OHSU members, including those in administrative roles, addressing NWCCU’s Concern 2. Additionally, all OHSU members are annually evaluated on their behavioral expectations and if needed are provided with advocacy resources through OCIC. The role and function of OCIC ensures that all OHSU members, including administrators, are held accountable and also treated in a fair and equitable manner.

³⁸ OHSU’s annual review process entitled GROW stands for Goals, Results, Overall, and Way forward.

NWCCU 2020 Standard 2.F.3

The final category of concern presented to OHSU by NWCCU focused on compliance with NWCCU 2020 Standard 2.F.3.

NWCCU 2020 Standard 2.F.3

Consistent with its mission, programs, and services, the institution employs faculty, staff, and administrators sufficient in role, number, and qualifications to achieve its organizational responsibilities, educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs.

NWCCU Concern 3 - Clarification on sufficiency and training of staff in critical departments (Standard 2.F.3)

OHSU employs and trains (on an ongoing basis) sufficiently qualified faculty, staff, and administrators to achieve its organizational responsibilities, educational objectives, to establish and oversee academic policies, and to ensure the integrity and continuity of its academic programs, addressing NWCCU Concern 3 and in compliance with the requirements of NWCCU Standard 2.F.3. Specifically, with OCIC, since its inception and the addition of the vice president of OCIC and OHSU Title IX coordinator, the office engages in robust training of its staff. Alongside the yearly required Title IX training, each OCIC employee is assessed for additional training needs. Personnel needing additional training are provided with professional development opportunities to obtain necessary skills. There is also a yearly book learning program, monthly sharing of journal articles, and two employees are sent to the National Conference on Race and Ethnicity in American Higher Education (NCORE) each year. All staff in OCIC have been trained in the Forensic Experiential Trauma Interview, and special attention is provided to receiving training specific to current issues, topics, and matters that are pressing on a national level (e.g., training related to Palestine as well as antisemitism has been provided to OCIC in the last 12 months).

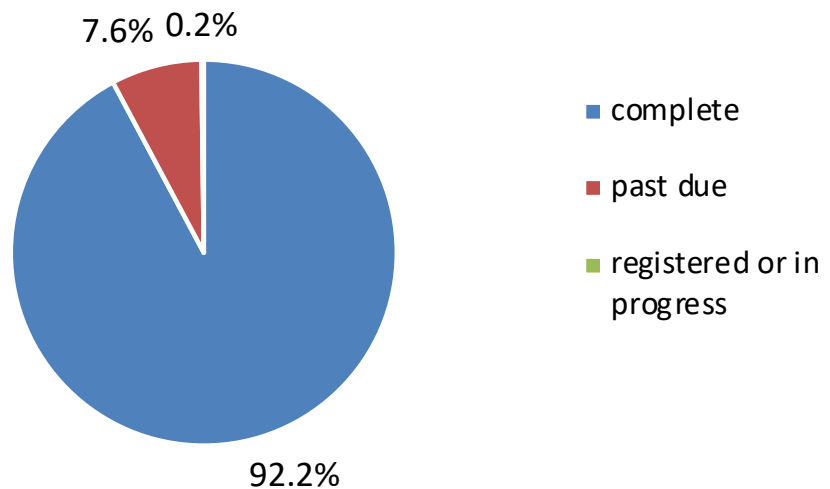
Additionally, OHSU requires trainings through the *Compass* learning and performance management system for all new employees on topics of *Integrity Foundations* and *Respect at the University*³⁹ as well as annual refresher trainings, such as the annual *Integrity Booster*, to all OHSU employees to keep the OHSU community reminded of expected behaviors. OHSU requires all community members, including faculty and staff, to comply with training expectations, which are provided through the *Compass* online learning and performance management system. OHSU members are notified about trainings, and reminders of required trainings, through the *OHSU Now* communication platform. OCIC provides an employee training on Title IX and the Clery Act through the *Building Supportive Communities: Clery Act and Title IX* course (92.2% completion rate for 2024-25 - Figure 2) which examines the issue of sexual harassment, including sexual assault, relationship violence, and stalking, in higher education. Employees who have been assigned the training and have not accessed

³⁹ Appendix 5: Respect for All flowchart and additional materials are available in OCIC *Prevention and Education Efforts*, (July 30, 2025) is available in the NWCCU Box folder and on site

it through *Compass* are identified as past due (reasons for past due could vary with an example being the individual left the employ of OHSU) and employees who have initiated the training but not completed would be identified as in progress. OHSU members who have not completed the training receive reminder alerts with notices and managers are directed to have their staff complete all trainings.

Figure 2: Building Supportive Communities: Clery Act and Title IX (for employees)

92.2% (or 18,797 employees) completed.



OCIC also sponsors the *Respect at the University* course, which educates all employees, students, and volunteers on the understanding of respectful behavior in the workplace and helps individuals identify behaviors that violate university policy or the law. The training addresses all types of respectful interactions and helps individuals understand proper behavior as it relates to all protected classes (e.g., gender, race, age, sexual orientation) and anyone they encounter.

OCIC engages in additional outreach to all students through two student trainings, *Sexual Assault Prevention for Graduate Students* and *Title IX Rights and Protections*, provided by the third party vendor Vector Solutions. Students are notified about the trainings through the *OHSU Now* student communication channel. While the title of the training *Sexual Assault Prevention for Graduate Students* focuses on graduate students OHSU expects all students to complete the sexual assault prevention training. Beginning September 15, 2025, all OHSU students, undergraduate, graduate, and professional students will be assigned revised student trainings updated with recent state and federal regulations. The *Sexual Assault Prevention for Graduate Students* (64.6% completion rate for 2024 – Figure 3) provides Title IX and Clery Act training to support students' interactions with advisors, faculty members, and peers. Students who do not complete the *Sexual Assault Prevention* training are sent reminders though *Compass*. OCIC also sends notifications to the dean's office encouraging the school to remind students to complete trainings.

Figure 3: Sexual Assault Prevention for Graduate Students (assigned to all graduate and undergraduate students)

64.6% (1,505 students) completed.

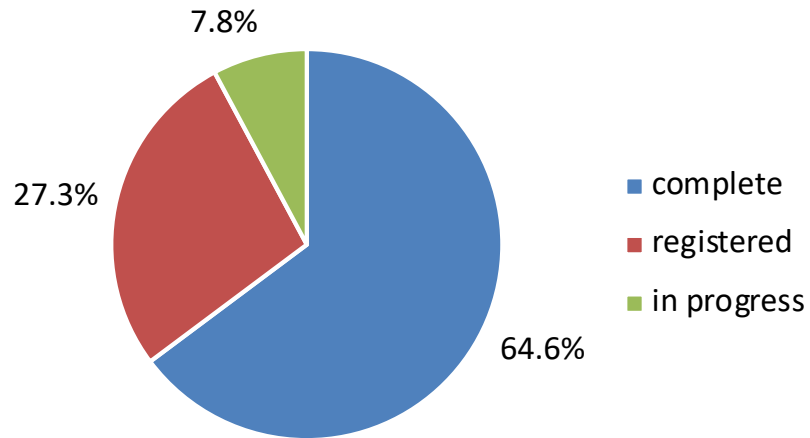
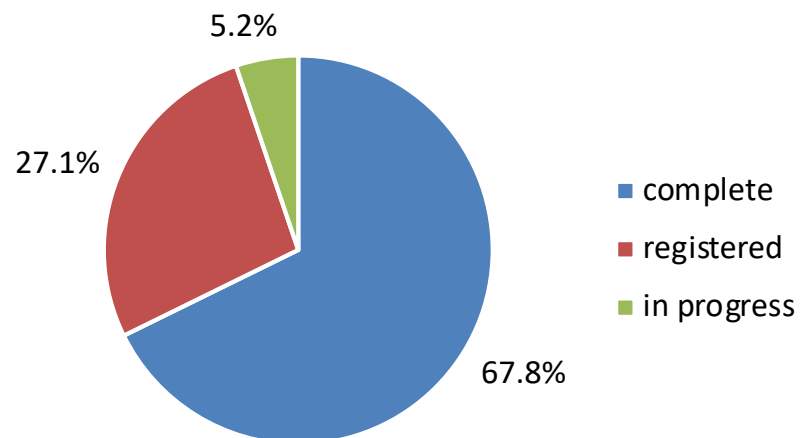


Figure 4: Title IX Rights and Protections (assigned to all students)

67.8% (1,528 students) completed.



The *Title IX Rights and Protections* (67.8% completion rate for 2024 – Figure 4) course provides all students with information about the importance of Title IX and what an institution’s obligations are when a formal complaint is filed. Topics include definition of sexual harassment, Title IX regulations and obligations, and grievance procedures. While the expectation for student compliance for trainings is high, currently there are no consequential measures taken for those students who did not complete the new annual trainings. The new vice provost for student affairs will lead the process to address student compliance with the new annual trainings.

OCIC, through the Prevention and Education Team, has delivered many trainings in multiple modes to ensure that all members at OHSU are aware of their reporting responsibilities. In the 2024-25 fiscal year, the Prevention and Education Team delivered 167 total trainings with 55 trainings administered in person. These trainings address reporting requirements and identify supportive resources information across OHSU’s mission units. These trainings provide additional information and resources to numerous leadership teams including deans, program directors, chairs, and student affairs⁴⁰ serving as another example of investing resources to ensure integrity and equitable treatment across the organization (NWCCU Concern 2).

Lastly, OCIC also implemented *Harassment Prevention* training modules to address discrimination, harassment and retaliation for employees and managers. This is a required training module to be completed within fifteen days upon hire or upon a position modification within OHSU. With the help of relatable workplace scenarios and real-life stories, these trainings offer practical guidance on navigating sensitive situations while cultivating an inclusive and collaborative work environment. The workplace component consists of employee scenarios with relevant and unique situations for those employees identified as healthcare workers. The overall number of OHSU members who completed the training was 22,646 for the 2024-25 fiscal year. The total and overall completion rate information for the *Harassment Prevention* modules when disaggregated for all employees and managers, as well as healthcare employees and managers, is provided in Table 2. The topic of harassment is also addressed in the required annual *Integrity Booster*. Students will also take the *Harassment Prevention* training beginning in FY 2025-26.

Table 2: FY 2024-2025 Harassment Prevention Training Module Completion Percentages

All OHSU	All Employees	All Managers	Healthcare Employees	Healthcare Managers
93.9%	94.6%	95.9%	93.7%	94.6%

OHSU provides a *Respect for All Guide*⁴¹. This guide provides information, resources, expectations, and support for OHSU’s community members when they suspect, witness, or experience a situation contrary to our mission and values. To increase and expand awareness about reporting options,

⁴⁰ A comprehensive listing of reporting trainings and presentations to OHSU units is presented beginning page 14 of *OCIC Prevention and Education Efforts*, (July 30, 2025) is available in the NWCCU Box folder and on site.

⁴¹ *The Respect for All Guide* is available in the NWCCU Box folder and on site.

OHSU established *Respect for All* posters and charts⁴² which are published and distributed widely across OHSU's campus locations and buildings. This guide and its distribution are also maintained and monitored through OCIC.

To ensure sufficiency and training of all OHSU employees to satisfy and comply with NWCCU Standard 2.F.3, OHSU requires all employees to be trained on discrimination, harassment, retaliation, sexual misconduct, Title IX and the Clery Act. All OHSU members must attest to the expectations of conduct as provided in the *Code of Conduct*, and OHSU reminds all members of their obligations annually. OHSU members who fail to comply with mandatory trainings are given multiple opportunities to complete their courses. The *Compass* management system sends automated reminder messages based on dates and overdue statuses to employees. Managers also receive automated notifications for reminders to ensure employees complete the required actions. If the mandatory training is not completed in a timely manner or within a reasonable timeframe, disciplinary action is initiated including turning off computer or facility access until training is completed. If an employee does not complete their training after persistent and repeated warnings, their manager will contact OHSU Human Resources for disciplinary action up to and including termination.

Concern 3a. What measures will OHSU adopt to ensure that critical departments such as the Title IX office are sufficiently staffed to allow timely processing of student complaints?

In compliance with NWCCU Standard 2.F.3, OHSU has increased the number of staff within OCIC to ensure the effective and timely processing of complaints, including student complaints. OCIC has increased its staff from 12 to 19 experts by adding three new confidential intake specialists, assembling a team of six trained investigators and compliance officers, and initiating a Prevention and Education Team tasked with educating the institution regarding reporting responsibilities, providing information about the reporting and investigation process, and facilitating informal resolutions to reports of concern. The vice president of OCIC and OHSU Title IX coordinator assesses the sufficiency of the staffing needs of OCIC and submits requests for additional staff as needed directly to the OHSU President.

As a result of these strategic investments in OCIC since 2023, OHSU ensures that complaints and grievances are addressed in a fair, equitable, and timely manner. Through the investment in more personnel for OCIC, OCIC is staffed to achieve its established benchmark “to resolve all formal complaints within 120 business days” (*DHR Manual*, pg. 27). This institutional investment has reduced the timing of investigations to an average of less than 60 days, a vast improvement from investigation time durations that were previously averaging between 18 and 24 months.

Through strategic investments in the number of OHSU personnel, OCIC is sufficiently staffed to process complaints and investigations in a timely manner. With this staffing increase, OHSU has demonstrated its compliance with NWCCU Standard 2.F.3.

⁴² Appendix 5: *Respect for All* chart

Concern 3b. What measures will OHSU adopt to ensure proper training of staff that process student complaints?

OHSU has established training expectations in the *DHR Manual (Chapter XVI – Training pg. 42-43)* that requires any individual at the institution who processes complaints receive to appropriate and proper training, satisfying and in compliance with NWCCU Standard 2.F.3. *Chapter XVI – Training* is divided into three sections:

- A. OHSU Required Training** – requires that all personnel involved with informal resolutions or investigations must have adequate training including trauma-informed and culturally responsive processes, procedures, and services.
- B. Title IX Required Training** – identifies trainings for decision-makers, investigators, or any individual who facilitates an investigation on the definition of sexual harassment, the scope of OHSU's education program or activities, how to conduct an investigation, including hearings, appeals, and how to serve impartially, including avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Any materials used will not rely on sex stereotypes and must promote impartial investigations.
- C. Students and Employees** – establishes that OHSU will require additional trainings in furtherance of its legal and ethical duty.

When the vice president of OCIC and OHSU Title IX coordinator was hired in June 2023, one of the first activities the vice president initiated was a benchmark of OCIC personnel training. This assessment guaranteed all employees in OCIC possessed the appropriate and adequate training and skills and identified and addressed any gaps in desired training. Personnel who needed additional training were provided with professional development opportunities to obtain necessary skills.

OHSU employees and personnel who are involved in investigations, including informal resolutions or Title IX investigations, are required to have appropriate and adequate training. The vice president of OCIC and Title IX coordinator ensures that personnel who process complaints are properly trained, ensuring OHSU is compliant with NWCCU Standard 2.F.3.

Conclusion

OHSU holds itself to the highest ethical standards (Eligibility Requirement 8 – Institutional Integrity). With this Addendum, OHSU has demonstrated compliance with NWCCU Standard 2.D.2 and Standard 2.F.3.

OHSU has made strategic investments in OCIC, led by OHSU's vice president of OCIC and OHSU Title IX coordinator, who has increased office staffing and reviewed and revised OHSU's policies around discrimination, harassment, and retaliation. OHSU has established and strictly follows *OHSU Policy: 03-05-048 Discrimination, Harassment and Retaliation*, which defines prohibited discrimination, harassment (including sexual harassment), and retaliation; outlines reporting obligations; and describes the investigation process for complaints or reports of discriminatory misconduct. OCIC follows a *DHR Manual* to ensure adherence with institutional policies and compliance with state and federal regulations. This manual provides clarification and guidance regarding institutional responses to complaints, particularly regarding discrimination, harassment, and sexual harassment and establishes procedures to ensure complaints are addressed in a fair, timely, and equitable manner (NWCCU Concern 1). Additionally, through the *DHR Manual*, the *OHSU Code of Conduct*, and OHSU policies, the institution addresses the equitable treatment of all members, including administrators. All OHSU members are treated in a consistent, fair, and equitable manner during investigations (NWCCU Concern 2).

OCIC has partnered with multiple offices across the institution including the Office of Public Safety, Human Resources, Integrity, Faculty Senate, the labor unions, and the Office of the Provost to ensure broader communication around policies which encompass all OHSU community members. Strategic investments in personnel in OCIC have resulted in an increase in the number of trained investigators, compliance officers, and confidential intake specialists. These personnel additions not only expanded resources and outreach to the OHSU community but also have improved the response time to address grievances and complaints. OHSU also dictates required training for individuals who participate in investigations ensuring appropriately qualified staff and enforces training expectations for all OHSU members (NWCCU Concern 3).

With these institutional investments in people, and the improvements in processes, policies, trainings, and resources, OHSU has appropriately addressed NWCCU's three concerns and is in compliance with NWCCU 2020 Standard 2.D.2 and Standard 2.F.3.

Contributors to the Addendum

Marie Chisholm-Burns, Office of the Provost

Elias Cohen, Institutional Research and Effectiveness

Angela Fleischer, Office of Civil Rights Investigations and Compliance

Robert Halstead, Accreditation

Cherie Honnell, Enrollment Management and Academic Programs

Britt Hoover, Office of Student Affairs

David Robinson, Office of the Provost

Christina Spivey, Office of the Provost

Andrew Stickel, Institutional Research and Effectiveness

Anna Teske, Academic Affairs

Constance Tucker, Educational Improvement and Innovation

Appendix

Appendix 1: March 5, 2025 - NWCCU Notification Letter



March 5, 2025

President Steve Stadum
3181 S. W. Sam Jackson Park Road
Portland, OR 97239-3098

Dear President Stadum,

We have reviewed your response to our request for information pursuant to Northwest Commission on Colleges and Universities' (NWCCU) [Receipt of Unsolicited Information Policy](#).

Oregon Health and Science University (OHSU) has undertaken two external investigations regarding sexual misconduct, discrimination, and the handling of related complaints since 2021 and the Schneider investigation identified at least some of the same issues as the previous Covington investigation. Based on your response, we have determined that additional follow-up is necessary to evaluate the effectiveness of the policy and process changes in ensuring the institution's compliance with NWCCU 2020 Standard 2.D.2.

The institution advocates, subscribes to, and exemplifies high ethical standards in its management and operations, including in its dealings with the public, NWCCU, and external organizations, including the fair and equitable treatment of students, faculty, administrators, staff, and other stakeholders and constituencies. The institution ensures that complaints and grievances are addressed in a fair, equitable, and timely manner.

OHSU must address this issue as an addendum to the Mid-Cycle review in Fall 2025. All the materials you have submitted thus far will be provided to the peer evaluation team and an additional evaluator with appropriate expertise will be added to the evaluation team.

If you have any questions, please contact your NWCCU Liaison, Dr. Gita Bangera (gbangera@nwccu.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Fox".

Jeff Fox
Interim President

CC:
David Robinson, Accreditation Liaison Officer, OHSU
Gita Bangera, Senior Vice President, NWCCU
Mellissa Thoreson, Director of Institutional Evaluation and Planning, NWCCU

8060 165th Ave NE | Suite 200 | Redmond, WA 98052 | nwccu.org

Appendix 2: December 9, 2024, OHSU Response by Interim President Stadum



December 9, 2024

Sonny Ramaswamy, Ph.D.
President
Northwest Commission on Colleges and Universities
8060 165th Ave NE
Redmond, WA 98053

Office of the President

tel 503 494-8252
fax 503 494-8935

stadumsteve@ohsu.edu
www.ohsu.edu

Mail code: L101
3181 S.W. Sam Jackson
Park Rd.
Portland, OR 97239

President Ramaswamy

I am responding to your email dated November 14, 2024 in which you noted concerns about OHSU's compliance with NWCCU Standards, Eligibility Requirements, or Policies regarding its handling of student complaints. The issues raised fell into three categories: (1) clarification regarding institutional responses to student complaints particularly regarding discrimination or sexual harassment; (2) clarification regarding equitable treatment of constituents, including administrators; and (3) clarification on sufficiency and training of staff in critical departments. To address the concerns, you asked that we respond to three questions, which we have done below:

1. Clarification regarding institutional responses to complaints, particularly regarding discrimination or sexual harassment. (Standard 2.D.2)

a. How will OHSU ensure that student complaints especially related to discrimination, sexual harassment/Title IX will be processed in a fair, timely, and equitable manner?

Under OHSU's policies, any form of prohibited discrimination, harassment—including sexual harassment and sexual misconduct—and retaliation, has no place at OHSU and is not tolerated. OHSU's Discrimination, Harassment and Retaliation Policy encourages all OHSU community members, including students, who believe they have experienced any type of discriminatory misconduct to report the incident to OHSU's Office of Civil Rights Investigations and Compliance (OCIC).¹ Please see OHSU Policy 03-05-048, Discrimination, Harassment, and Retaliation (attached). Discriminatory misconduct includes discrimination, harassment, sexual harassment, sexual misconduct, sexual assault, domestic violence, dating violence, stalking, sexual exploitation, and retaliation. Individuals can report complaints online or by calling OCIC. Reports may also be submitted anonymously. Additionally, all employees, unless otherwise

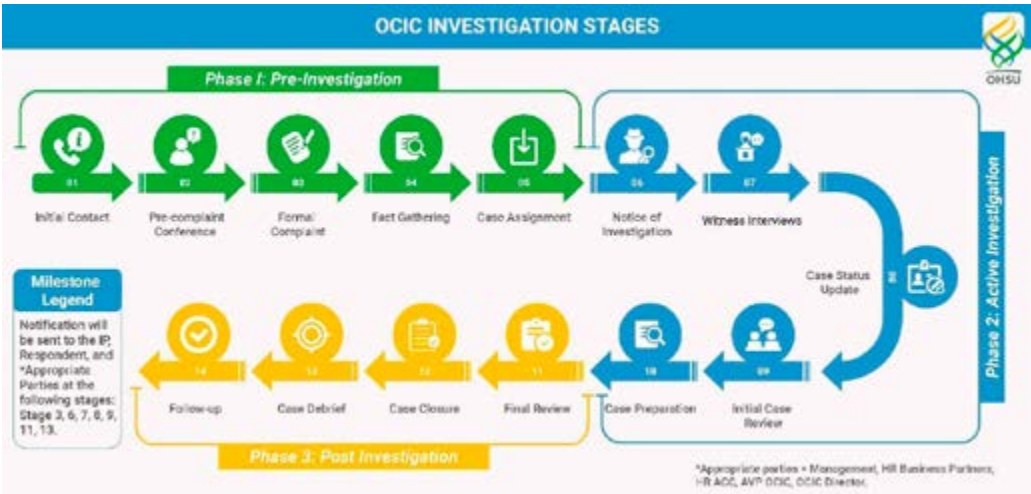
¹ OCIC was formerly known as the Office of Affirmative Action and Equal Opportunity (AAEO).

classified as “Confidential Employees,” have reporting obligations under the policy. The Confidential Advocacy Program (CAP) for students, housed in the Provost’s office, remains available to students as a resource of support and information. When an employee becomes aware of, or reasonably suspects, an alleged incident of discriminatory misconduct under the policy that involves a student or employee, they are obligated to report information they have to OHSU’s OCIC/Title IX office. OHSU will then respond promptly and effectively to reports of discriminatory misconduct.

OCIC now includes 1) a Prevention and Education team that is charged with educating the campus regarding reporting responsibilities and options, providing information about the reporting and investigation process, and facilitating informal resolutions. 2) a Confidential Advocacy Program for Employees; 3) the ADA coordinator for the institution who is responsible for institutional compliance with the ADA including providing consultation for the Office of Student Accommodation and Employee Leaves and Accommodations ; 4) a team of trained investigators and compliance officers who assess concerns and conduct investigations affecting all members of the OHSU community, including students, faculty, and staff; and 5) three Confidential Intake Specialists who help navigate resources, provide supportive measures and to serve as a guide through institutional process. Many of these positions have been added in the past 15 months.

Over the past 15 months concerted efforts have been made to decrease the time in investigation. The institution has invested in more staff for OCIC, and the latest report has the average date to close at 58 days, a vast improvement from timelines that were extending out to 18 and 24 months.

The graphic below has been shared with the OHSU community to increase understanding of the investigative process and when communications will occur during the process



**2. Clarification regarding equitable treatment of constituents, including administrators.
(Standard 2.D.2)**

- a. What measures will OHSU take to ensure that administrators are held accountable, but treated in a fair and equitable manner?**

OHSU will follow the attached Discrimination, Harassment, and Retaliation Policy and maintain a consistent and equitable sanctioning when appropriate.

3. Clarification on sufficiency and training of staff in critical departments (Standard 2.F.3)

- a. What measures will OHSU adopt to ensure that critical departments such as the Title IX office are sufficiently staffed to allow timely processing of student complaints?**

Since April of 2024 OCIC has added 7 positions to better support the work in OCIC. All except one position has been filled at this time. Staffing needs will be regularly evaluated.

- b. What measures will OHSU adopt to ensure proper training of staff that process student complaints?**

All employees of OCIC receive training each year. Additionally, the institution has now implemented sexual misconduct training for all employees and all students. There is a separate training course for all students and all employees on discrimination, harassment, and retaliation. When the new Vice President of OCIC was hired in June 2023, the Vice President assessed all of the individual employee training needs in order to identify and address any gaps. Most of the staff in OCIC have now been trained in the Forensic Experiential Trauma Interview.

I hope this letter adequately addresses NWCCU's concerns, but please do not hesitate to contact me if you have any additional questions.

Sincerely,



Steve Stadum, JD
Interim President
Oregon Health & Science University

Cc: David W. Robinson, Ph.D. OHSU NWCCU Accreditation Liaison Officer
Gita Bangera, Ph.D., NWCCU Senior Vice President

Appendix 3: OHSU CAPE internal O2 webpage

[Home](#) / [About OHSU](#) / Confidential Advocacy Program for Employees (CAPE)

Confidential Advocacy Program for Employees (CAPE)

Confidential Advocacy Program for Employees (CAPE) provides support to OHSU employees who have concerns of bias, harassment, discrimination and/or retaliation. We are also a confidential resource for employees experiencing interpersonal violence such as stalking, intimate partner violence, sexual harassment and sexual assault. Our team works with employees to think through the safety, health, mental wellness and workplace support they may need and connect them with resources internal and external to OHSU.

CAPE is a program of no record. We collect minimal data for the purpose of service improvement and aggregate reporting. Communication with a CAPE advocate in the context of receiving advocacy services will remain confidential.

About CAPE

This page includes information about:

- [Our services](#)
- [Confidentiality](#)
- [Scope of program](#)
- [Vision](#)

Our services

At CAPE, we:

- Are participant-centered and provide a confidential starting point for processing concerns related to discrimination, harassment, sexual misconduct

- a. Please keep in mind that OHSU has rights to all correspondence made through OHSU accounts and on OHSU devices and can access these records without notice. Additionally, personal email runs the risk of being intercepted and privacy cannot be guaranteed. For these reasons, we advise you to limit what you share over email and Microsoft Teams messenger.

Scope of program

The following is meant to clarify what falls outside the scope of CAPE. If you are unsure if CAPE is the right resource for you, please do not hesitate to reach out for guidance.

- CAPE is intended to support employees at OHSU. If you are a student, you can receive confidential support through Student CAP at www.ohsu.edu/confidential-advocacy-program (<http://www.ohsu.edu/confidential-advocacy-program>).
- CAPE advocates are not mental health counselors. We can provide counseling resources at your request. You can also reach OHSU's [Spark Wellness program](#) directly at [800-433-2320](tel:800-433-2320) (<tel:800-433-2320>), or [Occupational Health Bridge Mental Health](#) at [503-494-5271](tel:503-494-5271) (<tel:503-494-5271>) or email occhealth@ohsu.edu (<mailto:occhealth@ohsu.edu>).
- CAPE is housed in the [Office of Civil Rights Investigation and Compliance](#) (<https://www.ohsu.edu/office-of-civil-rights-investigations-and-compliance>) (OCIC). We can serve as an advisor through the reporting and investigation process, although we have no influence on the investigation process nor its outcomes.
- As confidential employees, CAPE advocates do not report concerns to OHSU Integrity, Human Resources, The Title IX Coordinator, or the Office of Civil Rights Investigations and Compliance. There are a few limits to our confidentiality, which are outlined in the Confidentiality section.
- Contacting CAPE **does not** initiate an investigation and does not eliminate your reporting obligations as a witness of discrimination, harassment and retaliation at OHSU. If you would like to bypass advocacy and make a **confidential report**,

and retaliation.

- Provide systems navigation, resource connection, and ongoing support to people impacted by DHR and interpersonal violence, including information on civil protective orders and other legal resources for those impacted by stalking, IPV, and sexual assault.
- Promote personal autonomy and empowering impacted parties by outlining options, including supportive resources and reporting channels both within and outside of OHSU.
- Support safety planning for impacted parties to assist with active participation in work responsibilities and OHSU community offerings, as well as promoting safety at home.
- Reduce barriers impacting OHSU employees in relation to protected characteristics.

Confidentiality

CAPE is a program of no record. We collect minimal data for the purpose of service improvement and aggregate reporting. Communication with a CAPE advocate in the context of receiving advocacy services will remain confidential. This means what you share with a CAPE advocate will not be further disclosed.

We will not release any of your identifying information without an informed, explicit, written and time-limited release of information. The limits to this confidentiality are as follows:

1. If you disclose the abuse or intended abuse of a minor, elder or person with a disability.
2. You report you are imminently at risk of seriously harming yourself or someone else.
3. If presented with a court order to release records. In these situations, due to being an office of no record, there would be limited information to release, of which we would only release what is required by law.

you can do so via the [Integrity Helpline](#)

(<https://secure.ethicspoint.com/domain/media/en/gui/18915/index.html>).

- CAPE is not intended as a confidential resource for concerns related to the safety of patients, harassment by patients, or civil rights violations impacting the patient population at OHSU. Please contact the [OHSU Patient Relations Department](#) at [503-494-7959](tel:503-494-7959) (<tel:503-494-7959>) or advocate@ohsu.edu (<mailto:advocate@ohsu.edu>) to report concerns related to the treatment of patients, or [855-503-7233](tel:855-503-7233) (<tel:855-503-7233>) to report the abuse or neglect of a child, elder, or vulnerable person in the state of Oregon, and [866-363-4276](tel:866-363-4276) (<tel:866-363-4276>) in the state of Washington.
- CAPE is not a crisis resource. If you are having thoughts of hurting yourself or someone else, you can [contact 988](tel:988) (<https://988lifeline.org/>) for immediate crisis support. If you feel your safety is at imminent risk, please contact 911 or OHSU Public Safety, if you are on an OHSU campus, at [503-494-4444](tel:503-494-4444) (<tel:503-494-4444>).
- CAPE does not investigate or evaluate employment or union grievances or other contract administration issues, and we are not legal representatives.

Our vision

CAPE envisions an OHSU community free from prohibited conduct where all staff, faculty, students and volunteers feel equipped to seek support when faced with a possible civil rights violation, concern of biased treatment or act of interpersonal violence.

Contact us

If you believe CAPE is the right resource for you, or if you are unsure what support you may need, please use this link to [schedule an appointment with us](#) (<https://outlook.office365.com/owa/calendar/BKNGCAPESupportRequest@ohsu.edu/bookings/>), and

we can explore your options. You can also email us at [✉ CAP-E@OHSU.edu](mailto:CAP-E@OHSU.edu) (<mailto:CAP-E@OHSU.edu>) to learn more. We look forward to meeting you.

Areas of support:

- Domestic violence
- Sexual violence
- Stalking
- Discrimination and harassment including:
 - Age
 - Pregnancy
 - Disability
 - Race/color
 - Ethnicity/family of origin
 - Sex
 - Religion
 - Marital status
 - Sexual orientation
 - Gender
 - Military, reserve and veteran's status
 - Worker compensation (use of)
 - Family/Oregon Medical Leave Act (use of)

Appendix 4: Policy 01-50-025: Standard Practice for Investigations into Misconduct



OHSU POLICY MANUAL

Policy Number: 01-50-025

Policy Title: STANDARD PRACTICE FOR INVESTIGATIONS INTO MISCONDUCT

Effective Date: January 14, 2025

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1. Generally

This policy outlines OHSU's procedural commitment to: (1) eliminating, preventing, and addressing the effects of Misconduct; (2) fostering an environment where all individuals are well-informed and supported in reporting Misconduct; (3) providing a fair and impartial process, including constitutionally required due process where applicable, for all parties in investigations into Misconduct; and (4) identifying the general procedures by which alleged violations of University policies involving Misconduct will be evaluated. Nothing in this policy shall supersede or alter reporting, discipline, and/or investigation requirements under existing collective bargaining agreements, bylaws, policies, regulations, or laws.¹

2. Definitions

- A. **Misconduct:** Conduct in violation of OHSU's Discrimination, Harassment and Retaliation Policy; Workplace Violence Policy; Prohibition on Bullying Policy; Conduct Relating to Students – Proscribed Conduct; and/or sections 2, Managing Expectations and Meeting our Responsibilities, and 3, Our Responsibilities to Each Other and the People We Care For, of the OHSU Code of Conduct. Misconduct for purposes of this policy includes Discriminatory Misconduct as defined in [Policy 03-05-048, Discrimination, Harassment and Retaliation](#), which the Office of Civil Rights Investigations and Compliance (OCIC) exclusively investigates.
- B. **Responsible Offices:** The following offices may investigate allegations of Misconduct and may initiate disciplinary, dismissal or exclusion processes based upon investigatory findings: OCIC; Human Resources; OHSU Integrity Office; and the individual schools or college.

3. Investigation Responsibilities

In general, the following Responsible Offices will investigate the corresponding Misconduct, although Responsible Offices should coordinate and collaborate to

¹ These include obligations under Title IX, the Clery Act, and the Health Information and Quality Authority.

determine who has primary responsibility for Misconduct investigations.

- A. OCIC will investigate Discriminatory Misconduct.
- B. Human Resources will investigate Misconduct by employees and in some circumstances, volunteers, visitors, or third-party contractors.
- C. OHSU Integrity Office will support other Responsible Offices and may investigate Misconduct when investigation by other Responsible Offices is inappropriate or burdensome.
- D. Individual schools and college policy will dictate who within the school or college investigates student Misconduct.

4. Investigation Procedures

- A. Using the template manual referred to in section 4.B., Responsible Offices should develop and publish standard operating procedures, that describe the general procedures for evaluating alleged Misconduct and which should provide for:
 - 1) Appropriate coordination and communication with other investigative offices.
 - 2) Notice to the reporting party when an investigation is opened of both the investigation and the investigatory procedures of the Responsible Office.
 - 3) Notice to any responding party, of both the investigation and the investigatory procedures of the Responsible Office and opportunity for a responding party to respond to the allegations of Misconduct. Depending on the individual investigation, notice to the respondent may occur later in the investigation.
 - 4) Procedures to provide status updates to reporting and responding parties during the pendency of the investigation.
 - 5) Notice to the reporting and responding parties regarding findings of fact and determinations of whether OHSU Policy or the Code of Conduct was violated. Any notice will comply with FERPA and any other regulations regarding student educational records.
 - 6) If corrective action is recommended, a means to document and record that recommendation and initiate disciplinary, dismissal or exclusion processes if appropriate.

7) In certain situations, the Legal Department may assume responsibility for investigations and instruct other OHSU personnel to gather information for the investigation. In such cases, the assigned investigator(s) will follow counsel's instructions relating to communications and evidence to ensure that "attorney-client" and "attorney work product" privileges are preserved.

B. OHSU's Legal Department shall provide a template manual for the process of investigations required by these procedures. The template manual will provide guidance on best practice for investigations and ensure consistency across administrative and academic departments, but allow Responsible Offices to tailor procedures to their areas of responsibility. The Legal Department serves as a resource for guidance, advice and counsel on these matters and any others related to investigations.

5. Supportive Measures, Interim Actions and Remedial Measures

Regardless of whether any Responsible Office initiates an investigation, a process, or substantiates Misconduct, OHSU may:

A. Provide supportive measures to the reporting and responding parties as appropriate and as reasonably available. In deciding which supportive measures to implement, OHSU will attempt to mitigate the impact on affected parties, while also balancing the rights of all parties involved.

B. Implement Interim Action(s) while an investigation and adjudication occurs. Any Interim Action should protect the integrity of the investigation, prevent the recurrence of the alleged behavior and/or disruption to OHSU, and/or prevent retaliatory behaviors. The specific interim action(s) implemented will vary depending on the circumstances of each report. In some instances, the university may share information regarding such interim measures with a reporting party, or other appropriate individuals, on a need-to-know basis, such as for safety planning. Interim actions for employee respondents may include administrative leave or changing reporting lines. For students, interim actions may also include removal from campus and/or from some or all programs or activities.

C. Determine whether additional remedies for the parties or the OHSU community are necessary to restore and preserve equal access to OHSU's education programs and activities or to maintain a respectful workplace. Examples of such remedies may include the initiation or continuation of supportive measures (which may include leaves of absence, modifications to work schedules, safety planning, information and assistance regarding employee and student resources, and/or other reasonable measures), facilitated dialogue, and/or training for members of the OHSU community, as well as modifications to academic,

employment, or patient care conditions or assignments. Remedial, non-disciplinary action may also be taken where the alleged conduct does not constitute a policy violation, but additional incidents or escalation of conduct could give rise to a policy violation.

6. Responsibility for Other Investigations

Guidance for investigations not involving Misconduct, as defined above, shall be provided by the following policies:

- A. Policy 04-15-005, Research Misconduct;
- B. Policy 07-30-025, Investigation of Potentially Criminal Conduct²;
- C. Policy 12-70-010, Authorship Attributions.

Related Documents:

OHSU Code of Conduct
Policy 02-30-010, Conduct Relating to Students – Proscribed Conduct
Policy 03-05-048, Discrimination, Harassment and Retaliation
Policy 03-05-060, Prohibition on Bullying
Policy 07-30-025, Investigation of Potentially Criminal Conduct

External Links/Relevant References:

Title IX of the Education Amendments of 1972 to the Civil Rights Act of 1964
The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
Health Information and Quality Authority

Implementation Date: September 25, 2023

Revision History: January 14, 2025

**Responsible Offices: Office of Civil Right Investigations and Compliance (OCIC);
Human Resources; OHSU Integrity Office, Student Affairs**

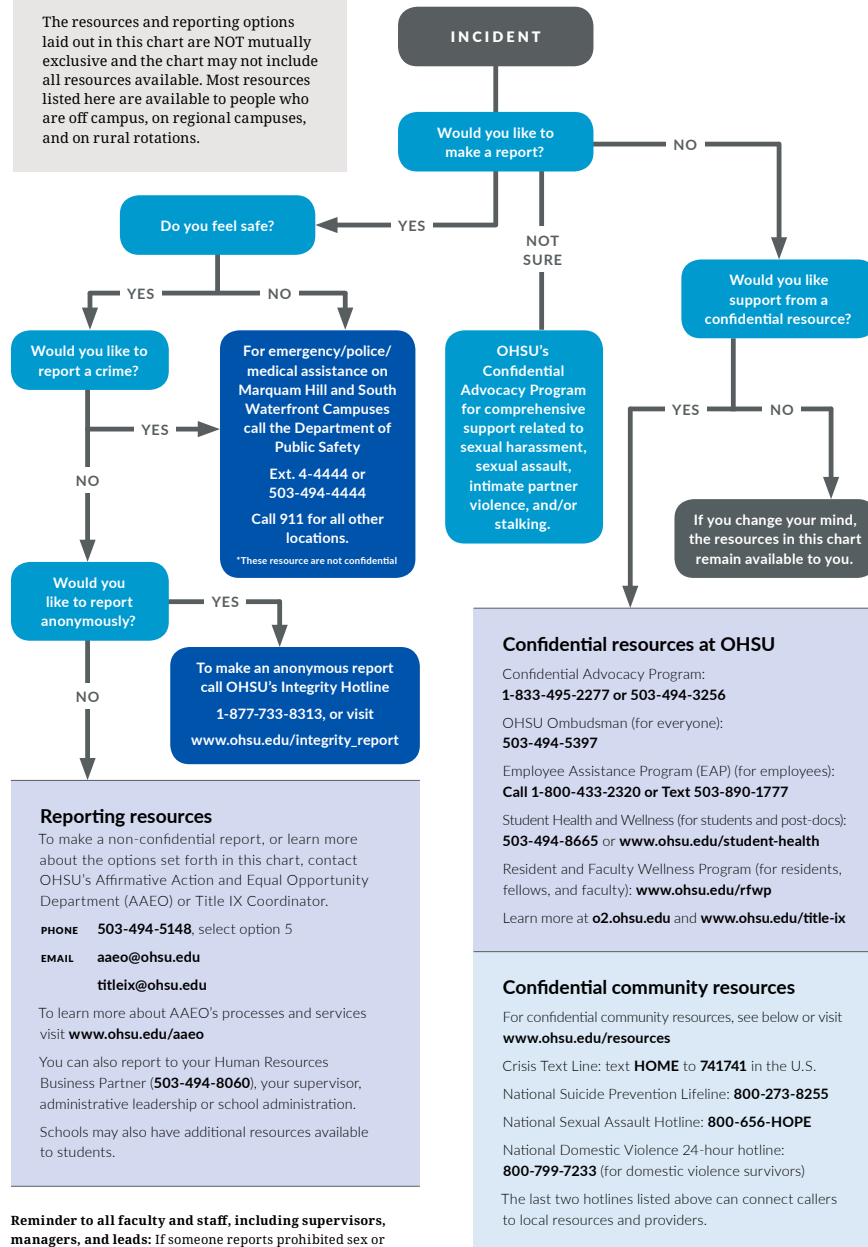
² OHSU Public Safety investigations adhere to ORS 353.125, Policy 07-30-025, the Clery Act, and other Public Safety protocols.

RESPECT FOR ALL.

Reporting options and resources for anyone who experiences, witnesses or hears of prohibited bias, discrimination, harassment, sexual assault or retaliation.



The resources and reporting options laid out in this chart are NOT mutually exclusive and the chart may not include all resources available. Most resources listed here are available to people who are off campus, on regional campuses, and on rural rotations.



Reminder to all faculty and staff, including supervisors, managers, and leads: If someone reports prohibited sex or gender discrimination or harassment, including sexual violence, to you, you must report the incident(s) to AAEO or the Title IX Coordinator. Please contact AAEO with any questions.

Need help with a different workplace problem?
o2.ohsu.edu/people-problems-at-work.cfm

Appendix 6: Violence in the Workplace Resources



Violence in the Workplace

Links:

[Clinical Violence Risk Assessment Job Aid](#)

[Code Green Activation Process](#)

[CPI's Top 10 De-Escalation Tips](#)

[Discrimination, Harassment and Retaliation Policy](#)

[Office of Civil Rights Investigations and Compliance \(OCIC\)](#)

[OHSU Code of Conduct](#)

[Patient Rights Flyer](#)

[Patient Safety Intelligence](#)

[Patient/Visitor Patient/Visitor Safety Assessment and Planning Policy](#)

[Respect for All Flowsheet](#)

[Respect for All Resource Guide](#)

[Restraint and Seclusion Policy](#)

[Safety Resources and Reporting](#)

[Well-Being](#)

[Workers' Compensation](#)

[Worker and Student Injury Reporting \(WSIRS\)](#)

[Workplace Violence Identification and Training](#)

[Workplace Violence Policy](#)

ADDITIONAL RESOURCES
ON PAGE 2 ►



elearning@ohsu.edu | 04/22/25 | Downloading this PDF and opening from your hard drive may improve performance.

Employee Assistance Program (EAP)

EAP is an available benefit-eligible employees.

- 1-800-826-9231

Students and Post-Docs

Student Health and Wellness Center can be reached at:

- 503-494-8665
- On O2

OHSU Ombuds

Open to all OHSU members. Ombuds provides safe, confidential, informal and impartial problem-solving assistance. Contact at:

- 503-494-5397
- www.ohsu.edu/ombuds
- ombuds@ohsu.edu

Residents and Faculty

Residents, fellow and faculty can find help via the Resident Faculty Wellness Program

- On O2

Office of Civil Rights Investigations and Compliance (OCIC)

OCIC promotes collaboration and respect within the OHSU community and the Oregon community at large, seeking to foster an environment free of discrimination, harassment and inequity for employees, students, patients and visitors. We value equity, respect for all, access, inclusion and integrity. We're honored to develop, lead and share initiatives to improve OHSU's diverse community.

- 503-494-5148
- ocic@ohsu.edu
- On O2

Title IX Coordinator

Title IX of the Education Amendments of 1972 is a federal law that prohibits discrimination in educational programs and activities that receive federal funding. The Act says that everyone has an equal right to education and employment at OHSU, regardless of their sex, sexual orientation, pregnancy or parenting status, and gender expression or gender identity.

- 503-494-0258

Center for Diversity and Inclusion

Embracing diversity, equity and inclusion gives us the power to be better at what we do, and allows us to demonstrate integrity, compassion and leadership.

- On O2

Career and Workplace Enhancement Center (CWE)

The CWE offers a number of free resources

- Conflict management classes
- Conflict management certificate series
- One-on-one conflict coaching service

These resources can help improve your conflict management skills and resolve interpersonal challenges at work.

- The Crisis Prevention Institute also provides online resources for trauma-informed care
- LinkedIn Learning offers active listening courses in many languages
- On O2

ADDITIONAL RESOURCES
ON PAGE 3 ►



Workplace Violence outside of OHSU

You are not required to report Workplace Violence that occurs outside OHSU if it is not in relation to your role at OHSU. However, OHSU does have options available that provide support and safety information to all OHSU community members.

Or, if you prefer to seek assistance outside OHSU, you may find these organizations helpful:

- Call to Safety (formerly Portland Women's Crisis Line)
1-888-235-5333 (24-hour crisis line)
503-235-5333
www.calltosafety.org
- Proyecto UNICA (24-hour hotline for Spanish speaking survivors of domestic violence and sexual assault)
503-232-4448
- The Survivor Project (Advocating for intersex and transgender survivors of domestic and sexual violence)
503-288-3191
www.isna.org
- National Domestic Violence Hotline
1-800-799-SAFE (7233)
1-800-787-3224 (TTY)
www.thehotline.org
- Portland Men, Ås Resource Center
503-235-3433
- Oregon Coalition Against Domestic and Sexual Violence
1-877-330-1951

Mental Health Crisis Line

(Multnomah County)

503-988-4888

1-800-716-9769

multco.us/mhas/mental-health-crisis-intervention

Rape Victim Advocates (for assistance with rape evidentiary exams and court proceedings):

- Multnomah County 503-988-3222
- Clackamas County 503-655-8616
- Washington County 503-640-5311
- Clark County, WA 360-696-0167

Sexual Assault Resource Center

503-640-5311 (24-hour crisis line)

1-888-640-5311

www.sarcoregon.org





Oregon Health & Science University
Mail Code: L349
3181 S.W. Sam Jackson Park Road
Portland, OR 97201

www.ohsu.edu/education/accreditation