
OFFICE OF CIVIL RIGHTS COMPLIANCE AND INVESTIGATION

Annual Report for 2018-2019 Academic Year

APRIL 2020

Washington State University



To the WSU Community

Holly Ashkannejhad, Director | Title IX Coordinator

Welcome to the Office of Civil Rights Compliance & Investigation's annual report. The purpose of this report is to provide greater transparency about the activities of the Office of Civil Rights Compliance & Investigation (CRCI), including information about complaints, investigations, outcomes, and compliance activities. We also hope to continue to engage the WSU community in these topics and spark interest and activity related to civil rights compliance and investigation. Addressing discrimination, harassment, and sex and gender based violence takes a unified effort, and we rely on our community partners to ensure WSU is taking system-wide steps to proactively meet civil rights compliance obligations, and to prevent, respond to, and address misconduct.

For more information about CRCI, please visit our website at crci.wsu.edu.

Executive Summary

Office of Civil Rights Compliance and Investigation Overview

The Office of Civil Rights Compliance and Investigation (CRCI) is responsible for providing technical guidance to the university community about equal opportunity, Title IX, Title VII, ADA, Affirmative Action, Clery Act, and other civil rights laws and regulations. CRCI also serves as the central resource for complaints under the WSU Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct, Executive Policy 15 (EP 15), providing investigations, consultations, and referrals, as appropriate. For more information about CRCI, please visit our website: crci.wsu.edu.

Meet our Team

Director

Holly Ashkannejhad, J.D.

Director – Compliance & Investigation
Title IX Coordinator

Compliance

Daniel B. Records-Galbraith, J.D.

Senior Compliance Coordinator
ADA Coordinator

Monica S. Collins

Affirmative Action Assistant
HR Consultant/Assistant

Alexis E. Guse

Compliance Program Coordinator

Investigation

Rachel M. Brooks

Civil Rights Investigator/Coordinator

Holly Campbell

Civil Rights Investigator/Coordinator

K. Raleigh Hansen

Civil Rights Investigator/Coordinator

Jenna Van Klaveren, J.D.

Civil Rights Investigator/Coordinator

Kristopher Alina

Investigative Program Coordinator

Geeta Shrestha

Office Assistant

Campus Partners

Combatting discrimination, sexual harassment, and sex and gender based violence is no small task. WSU is lucky to have so many system-wide partners who support these efforts. CRCI would specifically like to acknowledge:

- **System Leadership:** WSU President Kirk Schulz and System Chancellors Darryl Dewald, Sandra Haynes, Paul Pitre, and Mel Netzhammer vigorously support campus efforts to address misconduct, proactively prevent discrimination, and make WSU an inspiring place to work and learn.
- **Finance & Administration:** CRCI underwent a reorganization during the Spring semester of 2019. As part of the reorganization, CRCI began reporting to Stacy Pearson, the Vice President of Finance and Administration. Stacy Pearson has been consistently supportive of CRCI's efforts, as well as broader university compliance efforts, culminating in a search for a system-wide Chief Compliance Officer.
- **Student Affairs:** Our partners in Student Affairs serve a critical role in providing prevention training, community response, interim measures, and support to students. Under the leadership of Mary Jo Gonzales, Vice President, as well as our system Vice Chancellors, Student Affairs has also been instrumental in supporting efforts to improve campus climate and culture, as well as initiate campus discussions and debate regarding discrimination and protected speech.
- **Human Resource Services:** Human Resource Services partners with CRCI on employee investigations, alternative resolutions, and workplace management and safety plans. Under the leadership of Theresa Elliot-Cheslek, Vice President and Chief Human Resource Officer, Human Resource Services serves

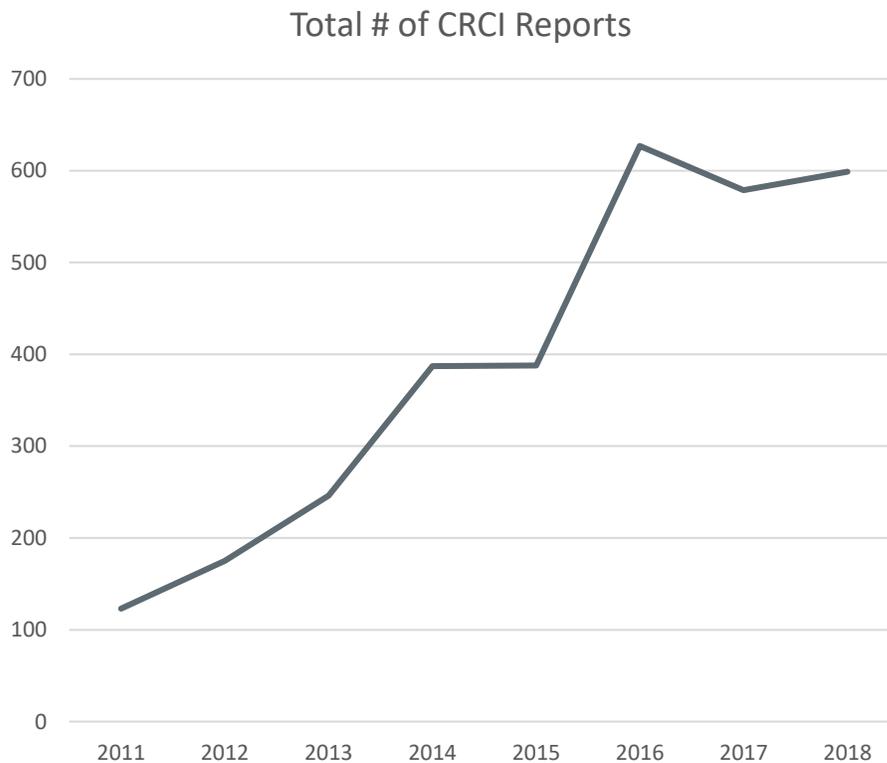
employees with integrity and provides consistent support regarding employee rights and responsibilities. CRCI would specifically like to acknowledge the work of the HR Consultants and their support staff for their knowledgeable and professional investigative assistance, as well as HRS Training and HRS Disability Services. Finally, CRCI recognizes the work of the HR Modernization Team, whose work will improve CRCI's abilities to meet WSU's compliance needs.

- **Athletics:** CRCI partners with the Deputy Athletics Director, Anne McCoy, in her role as Title IX Deputy Coordinator. She arranges support and safety measures for student athletes involved in Title IX matters, and arranges for Title IX training opportunities for student athletes and Athletics personnel.
- **Office of the Provost:** The Office of the Provost, under the leadership of Interim Provost Bryan Slinker, continues to support CRCI's services and activities, providing representation on multiple committees, and proactively engaging in projects related to diversity and equity.
- **Law Enforcement/Campus Security:** Our local police and campus security are essential to campus safety and security and work diligently to investigate reported crimes.
- **Victim Advocacy Agencies:** Each county in the state of Washington has a local victim rights advocacy agency which provides confidential, free support service to survivors of sexual assault and intimate partner violence. These non-profit agencies serve a crucial role in providing services and advocacy for those experiencing misconduct.
- **Prior leadership:** CRCI would not be able to offer the same level of support today if it had not been for the efforts of its previous director, Kimberly Anderson, who departed WSU for a new opportunity during the Spring 2019 semester. In particular, Kimberly Anderson's sensitivity to the needs of survivors of sexual assault, stalking, and intimate partner violence, as well as her understanding of the impact of incidents and investigations on all participants, led to the development of support focused services which still benefit our campus today.

CRCI is incredibly grateful for our university partners who continue to support WSU's efforts to combat discrimination and harassment.

Reports to CRCI

After seeing a steep increase in reports per year to CRCI since 2011, CRCI experienced some stabilization in the number of reports between 2016-2018, as seen in the below graph.



The annual report data provided below includes information on reports that were initially made to CRCI during the 2018-2019 academic year; this report does not include information about investigations that may have been initiated or completed during the 2018-2019 year, where those investigations were triggered by a report from a prior academic year.

During the 2018-2019 academic year, CRCI received 566 reports. CRCI conducts outreach and some level of initial investigation on all reports received, but attempts to provide deference to the wishes of the reporting party, where appropriate. This has resulted in CRCI providing multiple options to reporting parties, including:

1. Documenting a concern;

2. Facilitating resources;
3. Requesting a consultation;
4. Requesting an alternative resolution; or
5. Requesting a formal investigation.

The reported cases stemmed from all parts of the WSU system, as follows:

Campus	Number of reports to CRCI
Pullman	463
Vancouver	46
Spokane/Yakima	22
Tri-Cities	21
Everett/Bremerton	1
Extension	13
Global	2

Note: Some matters implicated more than one campus location.

For all cases received, CRCI performed outreach and provided resources and reporting options to the reporting party. Based on information provided to CRCI, and taking into consideration the wishes of the reporting party, CRCI initiated 60 investigations into allegations regarding student and/or employee conduct. CRCI also provided 136 consultations and made referrals in 102 matters. Finally, CRCI engaged in one comprehensive compliance review, a proactive process designed to ensure processes are in line with best practices and to provide technical guidance as needed.

The majority of complaints CRCI received were from student complainants; similarly, the majority of complaints were about student responding parties. The below graph includes a breakdown of this information. Please note, “students” can include WSU students, former WSU students, prospective WSU students, or students from another institution. “Employees” includes faculty, administrative professionals, civil service, bargaining unit, temporary/hourly, and student employees. Finally, CRCI also receives reports which do not fit into

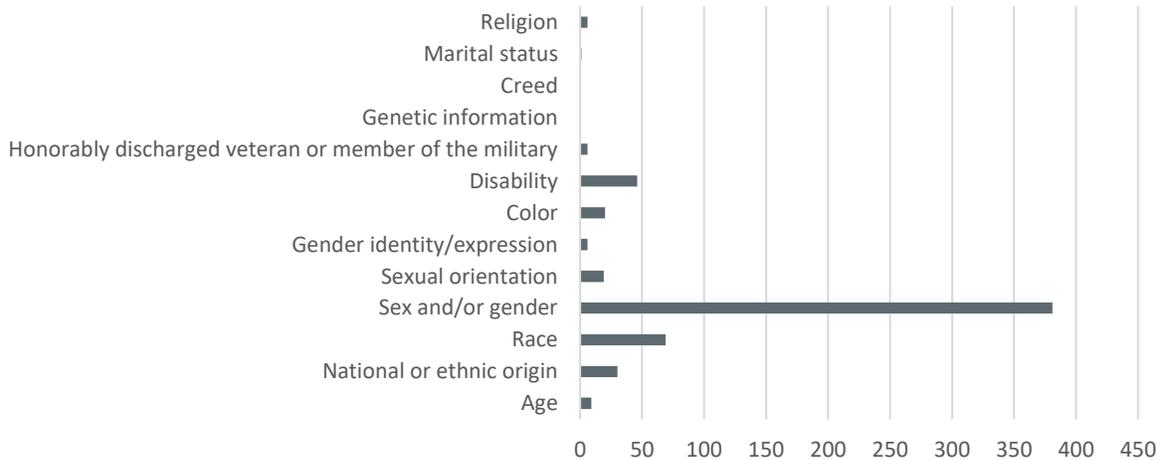
these categories (e.g. complaints more appropriately directed to other agencies, complaints with anonymous responding parties, and complaints against individuals affiliated with WSU, such as volunteers).

Report involves:	Number of Reports
Student reporting party	406
Employee reporting party	105
Student responding party	206
Employee responding party	121

Note: Some matters involved multiple reporting parties or responding parties, and/or unknown responding parties

Consistent with past years, the vast majority of complaints to CRCI involve allegations based on sex and/or gender, indicating a continued need for Title IX prevention and response training and education.

Number of CRCI Reports based on Protected Class



CRCI Investigations

CRCI conducted 60 investigations from matters reported during the 2018-2019 academic year. These investigations looked into alleged conduct from various WSU community members, including:

Primary Respondent Category	Number of investigations
Administrative Professional	8
Bargaining Unit	1
Civil Service	2
Employee - other	1
Faculty	10
Graduate Student	4
Student Employee	1
Undergraduate student	31
Volunteer	2

Title IX Investigations/Inquiries

Investigations or inquiries into conduct based on sex and/or gender, including disparate treatment, sexual harassment, sexual assault, intimate partner violence, stalking, or sexual exploitation, resulted in the investigation outcomes listed in the following table.

Type of Conduct / Responding Party Category	Count of CRCI Outcome
Different Treatment	6
Administrative Professional	3
Did not find a violation	1
Pending	1
Violation	1
Faculty	3
Did not find a violation	2
Pending	1
Discriminatory harassment	1
Undergraduate student	1
Did not find a violation	1
Intimate Partner Violence	1
Undergraduate student	1
Violation	1
Sexual Assault	19
Administrative Professional	1
Violation	1
Graduate student	2
Violation	2
Undergraduate student	16
Did not find a violation	5
Pending	1
Violation	10
Sexual Assault; Intimate Partner Violence	1
Undergraduate student	1

Violation	1
Sexual Exploitation	4
Administrative Professional	1
Unfounded	1
Faculty	1
Does not implicate EP 15	1
Undergraduate student	2
Closed due to other circumstances	1
Violation	1
Sexual harassment	9
Bargaining Unit	1
Did not find a violation	1
Employee - other	1
Did not find a violation	1
Faculty	2
Did not find a violation	1
Violation	1
Graduate student	1
Violation	1
Student Employee	1
Did not find a violation	1
Undergraduate student	3
Violation	3
Sexual harassment, discriminatory harassment	1
Administrative Professional	1
Closed for Departmental Resolution	1
Sexual harassment; Racial harassment	1
Civil Service	1
Did not find a violation	1
Stalking	4
Undergraduate student	4
Violation	4

CRCI's investigation reports are provided to the reporting and responding parties, as well as the appropriate sanctioning authority. For student responding parties, CRCI investigation reports are shared with the Center for Community Standards which may engage in conduct officer or conduct board hearings, depending on the severity of the conduct. Additionally, for student matters, students may share their preferred outcome with the Center for Community Standards, which at times will engage in a resolution agreement process to achieve outcomes based on preferences. For employee responding

parties, CRCI investigation reports are provided to the responding party’s supervisor for review under employment disciplinary policies. For all matters, participants also retain appeals rights, which can be exercised prior to any final university decision. Finally, it is important to note that even in matters where CRCI did not find a violation of Executive Policy 15, the conduct may still be inappropriate, unprofessional, or in violation of other university policies, such as the Workplace Violence and Bullying Policy or the Standards of Conduct for Students. Such matters are referred to the appropriate department or supervisor for further action under those policies. The following chart provides the final university outcome in more detail:

Primary Conduct	Primary Respondent Category	CRCI Outcome	Final University Outcome and/or Sanction
Different Treatment	Faculty	Pending	Pending Investigation Outcome
Different Treatment	Faculty	Did not find a violation	Did not find a violation
Different Treatment	Administrative Professional	Pending	Pending Investigation Outcome
Different treatment	Faculty	Did not find a violation	Did not find a violation
Different Treatment	Administrative Professional	Violation	Appointment not renewed
Different Treatment	Administrative Professional	Did not find a violation	Referral
Discriminatory harassment	Undergraduate student	Did not find a violation	Did not find a violation
Intimate Partner Violence	Undergraduate student	Violation	Conduct Hold
Sexual Assault	Undergraduate student	Violation	Not responsible
Sexual Assault	Undergraduate student	Violation	Suspension
Sexual Assault	Undergraduate student	Violation	Conduct Hold

Sexual Assault	Undergraduate student	Violation	Expulsion
Sexual Assault	Graduate student	Violation	Expulsion
Sexual Assault	Administrative Professional	Violation	Resignation
Sexual Assault	Undergraduate student	Did not find a violation	Did not find a violation
Sexual Assault	Undergraduate student	Violation	Disenrollment
Sexual Assault	Graduate Student	Violation	Probation; Other sanctions
Sexual Assault	Undergraduate student	Violation	Expulsion
Sexual assault	Undergraduate student	Violation	Expulsion
Sexual Assault	Undergraduate student	Did not find a violation	Did not find a violation
Sexual assault	Undergraduate student	Violation	Probation; Other sanctions
Sexual assault	Undergraduate student	Did not find a violation	Did not find a violation
Sexual assault	Undergraduate student	Violation	Expulsion
Sexual assault	Undergraduate student	Did not find a violation	Did not find a violation
Sexual assault	Undergraduate student	Pending	Pending Investigation Outcome
Sexual Assault	Undergraduate student	Did not find a violation	Did not find a violation
Sexual assault	Undergraduate student	Violation	Expulsion
Sexual Assault; Intimate Partner Violence	Undergraduate student	Violation	Permanent registration hold

Sexual Exploitation	Undergraduate student	Closed due to other circumstances	Closed due to other circumstances
Sexual Exploitation	Faculty	Does not implicate EP 15	Referral
Sexual Exploitation	Administrative Professional	Unfounded	Unfounded
Sexual Exploitation	Undergraduate student	Violation	Conduct hold
Sexual harassment	Employee - other	Did not find a violation	Did not find a violation
Sexual harassment	Undergraduate student	Violation	N/A
Sexual harassment	Undergraduate student	Violation	Probation; Other sanctions
Sexual harassment	Faculty	Did not find a violation	Did not find a violation
Sexual harassment	Graduate Student	Violation	Probation; Other sanctions
Sexual harassment	Bargaining Unit	Did not find a violation	Referral
Sexual harassment	Student Employee	Did not find a violation	Did not find a violation
Sexual harassment	Undergraduate student	Violation	Probation; Other sanctions
Sexual harassment	Faculty	Violation	Resignation
Sexual harassment; Racial harassment	Civil Service	Did not find a violation	Did not find a violation
Stalking	Undergraduate student	Violation	Permanent registration hold
Stalking	Undergraduate student	Violation	Conduct hold
Stalking	Undergraduate student	Violation	Conduct Hold
Stalking	Undergraduate student	Violation	Conduct Hold

Sexual harassment, discriminatory harassment	Administrative Professional	Closed for Departmental Resolution	Departmental Resolution
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Discrimination or Discriminatory Harassment Investigations/Inquiries

Although the majority of complaints to CRCI involve sex and/or gender, CRCI also conducted investigations or inquiries into conduct alleged to have occurred based on other protected class categories, such as national or ethnic origin, race, color, age, religion, sexual orientation, status as an honorably discharged veteran or member of the military, or physical, mental, or sensory disability, including the use of a trained service animal. Please note, some of these matters overlap with the Title IX investigations listed above, as reporting parties can allege that conduct is occurring on the basis of more than one protected class, including sex and/or gender. These investigations resulted in the following outcomes listed below:

Primary Conduct	Protected Class	Primary Respondent Category	CRCI Outcome	Outcome
Different Treatment	National or ethnic origin	Faculty	Violation	Pending Supervisory Action
Different Treatment	Race	Graduate Student	Unfounded	Unfounded
Different Treatment	Physical, mental or sensory disability; Sex and/or gender	Administrative Professional	Violation	Appointment not renewed
Different Treatment	Sex and/or gender; Status as an honorably discharged veteran or member of the military	Administrative Professional	Did not find a violation	Referral
Different Treatment	Physical, mental or sensory disability	Faculty	Did not find a violation	Did not find a violation
Different Treatment	Physical, mental or sensory disability	Administrative Professional	Did not find a violation	Did not find a violation
Different Treatment	Physical, mental or sensory disability	Faculty	Did not find a violation	Did not find a violation

Different Treatment	Physical, mental or sensory disability; Age	Faculty	Did not find a violation	Did not find a violation
Different Treatment	National or ethnic origin; Age; Color; Race	Civil Service	Violation	Demotion
Different Treatment	National or ethnic origin; Race	Administrative Professional	Did not find a violation	Did not find a violation
Discriminatory harassment	Sex and/or gender; Sexual orientation	Undergraduate student	Did not find a violation	Did not find a violation
Discriminatory harassment	Sexual orientation	Undergraduate student	Did not find a violation	Did not find a violation
Discriminatory harassment	Sexual orientation	Undergraduate student	Did not find a violation	Did not find a violation
Discriminatory harassment	National or ethnic origin; Race; Religion	Undergraduate student	Violation	Suspension
Retaliation	N/A	Volunteer	Violation	Resignation
Retaliation/Interference	N/A	Volunteer	Did not find a violation	Did not find a violation
Sexual harassment	Sex and/or gender; Race	Undergraduate student	Violation	N/A (Responding Party was no longer at WSU, due to other CRCI matter)
Sexual harassment, discriminatory harassment	Race; Sex and/or gender; National or ethnic origin	Administrative Professional	Closed for Departmental Resolution	Departmental Resolution

2018-2019 Academic Year Accomplishments and Initiatives

Policy

CRCI worked closely with the EP 15 Working Group, one of five working groups developed to address campus climate and culture. CRCI incorporated the feedback of the EP 15 Working Group into a new draft version of the WSU Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct, and also updated the policy to ensure it was compliant with current state and federal laws, regulations, guidance, and case law relating to civil rights and protected speech.

Training and Education

CRCI has engaged in extensive outreach and education over the past ten years to broaden community knowledge of its services. The following training services were provided:

- Employee Discrimination, Sexual Harassment, and Sexual Misconduct Prevention Training, regularly offered for in-person and video-conference, available for registration through the HRS Online Learning Account
- Equal Opportunity Issues for Supervisors, regularly offered for in-person and video-conference, available for registration through the HRS Online Learning Account
- Student Discrimination, Sexual Harassment, and Sexual Misconduct Training, provided at request of departments, faculty, or student organizations
- Sexual harassment and sexual violence prevention and reporting option to Athletic Department personnel, as well as new student athletes

Clery Responsibilities

CRCI began a comprehensive review of WSU Clery campus security and safety reporting and prevention responsibilities, considering the growth and expansion of WSU offerings and sites, and to ensure compliance with federal laws, regulations, and guidance. CRCI worked with campus partners to provide technical guidance on the Clery Act, assess Annual Security Report activities, campus crime statistics reporting, and training overviews. CRCI, in partnership with WSU Police Department and with the support of many campus partners, also published the WSU Pullman Annual Security Report, available for review here: crci.wsu.edu/2019-2020-clery-report.

Title IX Responsibilities

CRCI engaged in a focused review of Title IX Administration Duties, requesting feedback from campus partners to develop an administration model that would meet the needs of the campus community. CRCI also participated in a Student Affairs led NASPA Culture of Respect assessment, which included Pullman-specific review of prevention and response activities.

CRCI has also been engaging in activities to support WSU's Resolution Agreement with the Department of Education's Office of Civil Rights, including updating CRCI's Procedural Guidelines, developing training, and communicating policy and procedure to the university community.

ADA/504 Responsibilities/Accessibility

CRCI reinitiated an ADA steering committee, comprised of key stakeholders from across the WSU system, to provide feedback and establish priorities for compliance activities. CRCI worked with campus partners to provide technical guidance on disability related compliance concerns, develop and implement the WSU Service and Support Animals Policy (Executive Policy #39), assess training needs, and develop new training offerings through the HRS Online Training Account.

Affirmative Action/Equal Opportunity

CRCI developed comprehensive EEO/AA workforce and recruitment reports for specific areas and distributed them to senior leaders in each area to allow for data-driven planning and recruitment strategies. CRCI provided training sessions and individual consultations to accompany the EEO/AA reports. CRCI began work to redevelop an Affirmative Action Plan narrative that is consistent with WSU's values and continuing efforts to improve diversity, equity, and inclusion. CRCI worked with campus partners to provide technical guidance on affirmative action and related compliance concerns and to ensure that the HR modernization efforts are inclusive of affirmative action compliance requirements.

2019-2020 Academic Year Goals/Updates

Policy

After the 18-19 academic year review of the WSU Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct, EP 15, CRCI submitted the policy to the Office of Policies, Records, and Forms to circulate amongst system-wide stakeholders, pursuant to WSU's standard policy

approval process; EP 15 was published during the Spring 2020 semester. CRCI is also continually monitoring state and federal laws and regulations to update EP 15 as needed. For example, CRCI recently requested an update to the policy to include “immigration or citizenship status” as a class protected from discrimination, pursuant to the recent passage of Washington state’s Senate Bill 5165. Similarly, CRCI will be carefully reviewing the upcoming Department of Education’s Title IX regulations on institution’s response to sex and gender based violence.

In addition, CRCI is partnering with Cougar Health Services, Athletic Medicine, and the WSU Division of the Attorney General’s Office to develop policies and procedures to ensure patient privacy is protected when individuals report discrimination/harassment concerns occurring within a medical service, and to ensure it is easy for patients to request language interpreters or disability accommodations.

Training and Education

CRCI chose to significantly increase training opportunities and availability for the 19-20 academic year. The following training services are currently being provided, with new offerings in italics:

- Employee Discrimination, Sexual Harassment, and Sexual Misconduct Prevention Training, regularly offered for in-person and video-conference, available for registration through the HRS Online Learning Account
- Equal Opportunity Issues for Supervisors, regularly offered for in-person and video-conference, available for registration through the HRS Online Learning Account
- Student Discrimination, Sexual Harassment, and Sexual Misconduct Training, provided at request of departments, faculty, or student organizations
- Sexual harassment and sexual violence prevention and reporting option to Athletic Department personnel, as well as new student athletes
- *Title IX – Know Your Rights*, regularly offered in-person and via video-conference

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- *Undergraduate Student and Student Employee Rights and Responsibilities under WSU's Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct*, offered regularly via video-conference and in-person
 - *Graduate Student Rights and Responsibilities under WSU's Policy Prohibiting Discrimination, Sexual Harassment, and Sexual Misconduct*, offered regularly via video-conference and in-person
 - *Faculty Civil Rights Compliance Rights and Responsibilities*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account
 - *Classroom Accommodations Training for Faculty*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account
 - *Executive Policy 39 Service Animal Policy Training*, regularly offered in-person and via video-conference, available for registration through the HRS Online Learning Account

In addition to these regularly scheduled trainings, CRCI provides trainings at request for classes, student organizations, community forums, and employee organizations, tailored to meet the needs of the requesting organization. For more information on registering for or requesting a CRCI training, please visit our website: crci.wsu.edu/education-training. CRCI is currently developing multiple web-based trainings to increase training opportunities to those with busy schedules.

Clery Responsibilities

After academic year 18-19's comprehensive review, CRCI initiated a number of Clery related projects. CRCI partnered with campus law enforcement and security personnel to update the Campus Security Authority (CSA) Training, offering online via the HRS Online Training Account. CRCI also developed a CSA website, to provide educational information about CSA responsibilities and to help CSAs quickly and easily report required crime information to the appropriate crime statistics gathering agency. CRCI is also providing technical guidance and protocols to system-wide Annual Security Report administrators, to ensure reports and practices meet federal laws and regulations. Finally, CRCI

has engaged in more proactive outreach to CSAs to ensure they are aware of and trained in their reporting requirements.

Title IX Responsibilities

After working on the academic year 18-19 comprehensive review, CRCI recommended Title IX Administration responsibilities and appointments to the Office of the President, which formalized the appointments in the Fall 2019 semester. For more information on the division of Title IX responsibilities at WSU, please visit: president.wsu.edu/title-9. CRCI provided Title IX Deputy Coordinators with training on Title IX, Interim Measures, Athletics compliance, CRCI investigative procedures, survivor trauma, and student conduct proceedings, as appropriate. CRCI also developed and increased Title IX training opportunities to students and staff, developed and provided graduate student specific training, developed informed consent forms for intakes, updated intake packets for both reporting and responding parties, and developed an online Feedback Form and initiated a Student Feedback Committee, to better ensure CRCI's activities are consistent with our community's needs.

ADA/504 Responsibilities/Accessibility

CRCI developed and implemented new training offerings on topics including: Service and Support Animals and Classroom Accommodations Guidance for Faculty. CRCI also developed online tools and resources related to service animals in-training and departmental requests to review service animal concerns. CRCI is working with system-wide partners to establish service animal administrators at each campus. CRCI began working with partners to conduct focused ADA/504 compliance reviews of specified programs. CRCI worked with Facilities Services and Transportation Services to develop communications protocols for when accessibility is impacted by events or projects and will continue to provide assistance as these protocols are implemented. CRCI continues to connect with stakeholders to develop and provide technical assistance on disability related compliance concerns. For more information on accessibility at WSU, visit: access.wsu.edu.

Affirmative Action/Equal Opportunity

CRCI modified and included additional data elements in the EEO/AA reports based on feedback and requests from senior leaders. CRCI is working with partners to provide technical assistance and ensure consistency across several system-wide initiatives including the projects and programs being developed by the five working groups and efforts to assess pay equity. CRCI continues to gather feedback from the Affirmative Action Advisory Committee regarding priorities for policy development, targeted training programs, and institutional vision and direction related to Affirmative Action compliance. Beginning Summer 2020, CRCI will begin a thorough review of the WSU Equal Employment Opportunity and Affirmative Action Policy (Executive Policy #12) and draft preliminary revisions for review and feedback by stakeholders.