



































April 18, 2024

# Stakeholder Groups: Core Stakeholder Group

MISSION STATEMENT (A&M SYSTEM)

The mission of the system is to provide education, conduct research, commercialize technology, offer training and deliver services for the people of Texas and beyond through its universities and state agencies.

(System Policy 03.01: System Mission, Vision, and Strategic Planning Process)

19

Joint A&M System Civil Rights Meeting

April 18, 2024

20

#### Stakeholder Groups: Core Stakeholder Group

MISSION STATEMENT (SYSTEM ETHICS AND COMPLIANCE)

The System Ethics and Compliance Office is dedicated to promoting the highest standards of ethics and compliance in operational areas throughout The Texas A&M University System by:

- Enhancing partnerships among A&M System members through shared services, resources, and information to facilitate an ethical and compliant culture in all operations;
- Creating opportunities for professional development, education, and training in areas of ethics and compliance for faculty, staff, and students;
- Developing written policies and procedures to provide guidance and ensure compliance with federal and state laws and regulations, system regulations, and other requirements;
- Providing appropriate oversight and monitoring to assist the A&M System member community and respond to non-compliance.

SECO Website

April 18, 2024

# Stakeholder Groups: Core Stakeholder Group

#### MISSION STATEMENT (CIVIL RIGHTS COMPLIANCE)

Civil Rights compliance personnel in the System Ethics and Compliance Office (SECO) are committed to creating safe and nondiscriminatory environments across The Texas A&M University System through ensuring civil rights compliance by member universities, agencies, and system offices. SECO provides written regulations and guidance, professional consultation, training and resources to assist civil rights compliance personnel across the system, and conducts member compliance reviews.

SECO Website

21

Joint A&M System Civil Rights Meeting

April 18, 2024

# **Stakeholder Groups: Core Stakeholder Group**

### **MEMBER** MISSION STATEMENT (CIVIL RIGHTS COMPLIANCE)

The Civil Rights Stakeholder Group for (**Member Name**) is committed to creating a safe and nondiscriminatory environment across (**Member Name**) community through ensuring civil rights compliance by all departments and employees. The Stakeholder group ensures compliance with System Policy 08.01 and its related regulations by providing written rules and procedures, direct guidance to departments and employees, training and resources to assist civil rights compliance personnel.

(To Be Posted on Stakeholder Group Website)



Joint A&M System Civil Rights Meeting

April 18, 2024

24

# Stakeholder Groups: Core Stakeholder Group

## MEMBER STRATEGY (CIVIL RIGHTS COMPLIANCE)

How will we achieve our vision and realize our mission?

This information will be reflected in the civil rights stakeholder group's strategic plan, as will goals and objectives (how will measure outcomes, goals, and success)

(To Be Posted on Stakeholder Group Website)





April 18, 2024

28

# Stakeholder Groups: Core Stakeholder Group

### <u>Tasks</u>

- o Establish Vision, Strategies, Goals, and web presence
- Ensure compliance across civil rights in four<sup>+</sup> functional areas
- o Develop relationships to extended stakeholders across organization
- Convene sub-committees and create annual stakeholder report
- Regularly review civil rights complaint resolution processes
- Oversee Strategic Planning, Implementation, and Assessment Processes for civil rights compliance
- o Facilitate System compliance review process

27

Joint A&M System Civil Rights Meeting

# Stakeholder Groups: Core Stakeholder Group

#### First Year Calendar (approximate)

Months 1-3:

- o Develop relationships/build the team
- o Establish vision, strategies, goals, and web presence
- Create process map for each of four<sup>+</sup> major areas
   Conduct "gap analysis" as each compliance area is mapped (compliance/service)
- o Establish sub-committees and assign leadership
- o Oversee implementation of new regulations
  - o Develop Member Rules and operational procedures for three system regulations
  - o With SECO, troubleshoot implementation concerns



Joint A&M System Civil Rights Meeting

April 18, 2024

30

# Stakeholder Groups: Core Stakeholder Group

First Year Calendar (approximate)

Months 7-12:

- Implement training programs designed to complement SECO training programs
- Begin addressing areas of need identified through the gap analysis process by articulating desired outcomes and identifying benchmark organizations that engage in practices that coincide with the member's desired outcomes
- Those identified for compliance reviews in 2025-2026 begin preparation for the compliance review process







April 18, 2024

34

# Stakeholder Groups: Sub-Group 1: Case Management/Safety

#### <u>Tasks</u>

- o Meet regularly to review caseload and timelines
- o Identify gaps in practice and generate solutions
- o Ensure compliance with Clery requirements
- Ensure that civil rights records are being shared appropriately with CRO
- Interact with other sub-groups to identify areas where support, education, outreach, and training can be enhanced
- Aid in analysis of climate survey results for case management and safety implications
- o Inform the strategic planning, implementation, and assessment processes















Joint A&M System Civil Rights Meeting

April 18, 2024

42

# **Related Compliance Areas**

This is not a formal sub-group of the Civil Rights Stakeholder Group, but instead a collection of areas that interact with civil rights protections and/or accommodations and must therefore be compliant with federal and state laws and regulations, as well as with System Policy 08.01 and its related regulations.

Each area identified must interact with the Civil Rights Stakeholder Group to meet the tasks identified.

#### April 18, 2024

### **Related Compliance Areas**

#### <u>Tasks</u>

- Meet with Core Stakeholder Group to identify areas with civil rights implications and to create a process map for each area
- o Identify gaps in practice and generate solutions
- o Interact with other sub-groups to identify areas where efforts can be enhanced
- Aid in analysis of climate survey results for education, outreach, and training implications
- o Inform the strategic planning, implementation, and assessment processes
- o Engage in the SECO civil rights compliance review process as directed

43

Joint A&M System Civil Rights Meeting

April 18, 2024

44

43

### **Related Compliance Areas**

Primary Focus Areas

Athletics/Intramurals/Club Sports:

- 1. Comply with requirement to provide equitable opportunities for participation
- 2. Departmental and team rules and procedures must comply with civil rights laws and regulations
- 3. Assuring compliance with civil rights reporting and complaint resolution processes

April 18, 2024

## **Related Compliance Areas**

Primary Focus Areas

Admissions:

- 1. Comply with requirements related to application questions regarding prior conduct and routing the information appropriately for review
- 2. Ensuring that notifications to applicants are compliant with civil rights requirements

45

Joint A&M System Civil Rights Meeting

April 18, 2024

46

## **Related Compliance Areas**

Primary Focus Areas

Behavioral Intervention Team:

- 1. Ensuring that any emergency suspensions/removals of students be conducted in accordance with system civil rights regulations
- Ensuring that emergency withdrawals and returns from emergency withdrawals and shorter-term leaves for observation, hospitalization, and/or treatment are conducted in accordance with system civil rights regulations

April 18, 2024

## **Related Compliance Areas**

Primary Focus Areas

DEI Compliance:

 DEI Compliance is under the jurisdiction of each member's <u>Compliance Officer</u>; for purposes of civil rights compliance, each member must be able to demonstrate compliance with Texas DEI law during any SECO civil rights compliance review

47

Joint A&M System Civil Rights Meeting

April 18, 2024

48

## **Related Compliance Areas**

Primary Focus Areas

Registrar:

- 1. Ensuring that transcript notations, transcript holds, and registration blocks are conducted in accordance with system civil rights expectations
- Ensuring that any withdrawals or removals of students related to civil rights protections and/or the civil rights complaint resolution process are conducted in accordance with system civil rights expectations

April 18, 2024

## **Related Compliance Areas**

Primary Focus Areas

Military Programs:

- 1. Ensuring that the environment for all students participating in campus-based military programs are free of discrimination and/or harassment based on protected class
- 2. Ensuring compliance with the civil rights reporting and complaint resolution process

49

Joint A&M System Civil Rights Meeting

April 18, 2024

50

## **Related Compliance Areas**

Primary Focus Areas

Veteran's Services:

- 1. Ensuring that support services for veterans provide support and accommodations consistent with civil rights protections
- 2. Ensuring compliance with the civil rights reporting and complaint resolution process

April 18, 2024

## **Related Compliance Areas**

Primary Focus Areas

Contracts/MOUs:

- Ensuring that all member contracts and/or Memorandums of Understanding (and any related agreements with third parties) contain language that educates third parties of their responsibilities to the system member as it relates to civil rights protections, education, and/or training
- 2. Ensuring that the documents noted in #1 do not contain language that is contradictory to federal or state civil rights laws or regulations

51

Joint A&M System Civil Rights Meeting

April 18, 2024

## **Related Compliance Areas**

Primary Focus Areas

**Risk Management:** 

- Ensuring that all events, programs, and/or activities that take place on a property owned and/or controlled by a member not already noted as a related compliance area are conducted in compliance with federal and state civil rights laws and regulations, and comply with system civil rights regulations
- Ensuring that the events, programs, and/or activities noted in #1 comply with civil rights reporting and complaint resolution processes



Joint A&M System Civil Rights Meeting

April 18, 2024

54

# **Review of Complaint Resolution Processes**

- **1. Intake** (Reporting, Initial Outreach, Initial Meeting complainant, Supportive Measures, Emergency Actions, Informal Resolution, No Action/Closure, Assignment to Formal Investigation, Initial Meeting respondent)
- 2. Investigations (Notice, Pre-Meeting, Supportive Measures, Emergency Actions, Informal Resolution, Interviews, Interview Summaries, Initial Draft Report, Final Draft Report, Final Investigation Report, Informal Resolution, Charging Process, Assignment to Adjudication)
- **3. Adjudication** (Notice, Designated Administrator Review, Pre-Hearing Conference, Formal Hearing, Deliberations and Decision-Making, Sanctioning, Appeals Process, Informal Resolution, Enforcement of Sanctions)
- **4. Post-Process** (Reporting Requirements, Communications, Record Keeping, Evaluation of Formal/Informal Processes, Required Follow-up)





•	Action It	tems >	> Buc	lget Pla	anning					
	A Budget Items	Amount	Fund Source	Description	E Strategic Planning Action Items	Annual/1-time	G Assessment Cycle	Approval Authority	Implementation Contact	



April 18, 2024

50

Joint A&M System Civil Rights Meeting

#### **Assessment**

- **1. Collection of data** (statistical data, evaluation data, any additional and/or external data with direct linkages to what is being measured)
- **2.** Is there a need for supplemental data (e.g., direct observations, interviews, surveys, focus groups)?
- **3. Summarize and Interpret the Data** (conducted by Core SG and any appropriate extended stakeholders)

#### 4. Compare the Data to the Measurable Goal

- A. Did we meet the goal? Did we exceed the goal? Did we fall short of the goal?
- B. Were there positive unintended consequences? Negative unintended consequences?
- C. In areas where we fell short, what is the gap? Can we account for the gap? Would we benefit from adjustments to our approach/goal, adjustments to how we seek to achieve the goal, and/or <u>benchmarking</u> model practices to see how others addressed similar issues)



#### **Benchmarking**

#### 2) Data Collection Stage

- a) Collect information that you can publicly
- b) Make contact with the benchmarking target seeking assistance and information, as well as best means for collecting data (document reviews, interviews, site visits, etc.)
- c) Collect data and conduct initial assessment is the data complete? Are there other pieces of information that we need to collect?

61

Joint A&M System Civil Rights Meeting

April 18, 2024

62

April 18, 2024

### **Benchmarking**

#### 3) Data Analysis Stage

- a) Examine the data you have collected does it have philosophical and/or practical value as we look at the program, service, or practice that we are seeking to improve?
- b) What information have we gained that we predict might have a positive affect on our program, service, or practice? A neutral affect? A negative affect? Upon what assumptions are we basing these judgments, and are those safe assumptions?
- c) Can we combine pieces of what we collected from one benchmark target to what we are currently doing, or even attach pieces of what we collected from one benchmark target and combine with something collected from another benchmark target? Think creatively.

 Joint A&M System Civil Rights Meeting
 April 18, 2024

 Benchmarking
 April 18, 2024

 **4** Decision and Implementation Stage
 a) Determine what changes need to be made based on the identified program, service, or practice

 b) Identify a path for implementation (approvals, time, costs, personnel, infrastructure, education, promotion, etc.)
 c) Secure the resources needed for implementation and move forward with implementation and/or add implementation to the strategic plan

63

 Joint A&M System Civil Rights Meeting
 April 18, 2024

 Bias
 Cognizance of Bias

 Throughout the strategic planning process, implementation process, and assessment process, be cognizant of bias that may influence your perceptions, assumptions, and decision-making. Common forms of bias include:

 1. Confirmation bias is the selective search for supportive evidence, defined by the tendency to only find data that supports the desired decision or outcome

 2. Attentional bias is the practice of paying attention to some things while simultaneously ignoring other things.

 3. Anchoring bias is utilizing first impressions to overwhelm other factors when making .

#### <u>Bias</u>

#### **Cognizance of Bias**

- **4. Recency bias** is the tendency to think that trends and patterns we observe in the recent past will continue in the foreseeable future.
- **5. Conformity bias** is when your views are influenced or changed by the views of others. This is related to peer pressure and can cause you to go along with the majority (similar to groupthink).
- **6. Affinity bias** is the unconscious preference of people who share qualities with you or are similar to you.
- **7. Contrast effect** is when you assess two or more things by comparing them to each other, rather than assessing them based on their merit.

65

Joint A&M System Civil Rights Meeting

April 18, 2024

66

65

April 18, 2024

### **Regarding Compliance Reviews...**

The calendar for member compliance reviews will be shared at our meeting covering the process of conducting these reviews, which is currently scheduled for <u>Friday</u>, July 12.





Joint A&M System Civil Rights Meeting April 18, 2024 Decoming Training Investigators (and CRO/TIX) Trasday, June 25 (1:30-4:30 pm, Webex) - Investigator Training on New Civil Rights Regulations; Online training designed to provide all system investigators with an update on the new civil rights regulations and any inplications this may have for the investigations process; this session will include a review of the universal civil rights investigation report template and a review of the online resources provided for investigators Registration Link: https://tamus.webex.com/weblink/register/rca25b17e131909fd3cd2743c14278eff

