May 22, 2018

Dear USC community,

The recent matter involving a former physician at our student health center has been profoundly troubling for our community, and has disturbed us all very deeply. This matter has generated a fresh wave of discussions on our campuses, building on those related to one of our former deans. These discussions are imperative in recognizing deficits in our culture. Unacceptable behavior by anyone in our community is a profound breach of trust, and we must change the culture at the university, and instill a higher level of professionalism and ethics. We owe it to our students, to each other, and, indeed, to our entire community to do better. I am truly sorry these events happened within our community, and deeply regret how much distress they have caused. From the sorrow comes determination to lead change in our culture.

At USC, we have a particular responsibility to uphold and model the nobler values of our humanity. We are a world-class university, whose very mission is driven by the search for truth, and whose core values remain stitched in every piece of scholarly and creative work we produce. Our nation—and indeed, the world—turn to institutions of higher learning to model the highest ideals of our society, and USC’s scholars, researchers, and artists take this responsibility most seriously.

Our discussion of these two matters has echoed those we have heard throughout higher education, as well as those in other professional and personal settings, including the political, financial, and entertainment spheres. The voices from these discussions—coming from a range of communities, and reverberating across race, class, and gender—have been profoundly instructive, as they illuminate the complexity surrounding these issues, and heighten our empathy in responding. Indeed, over the past year, many of us at USC have become more sensitive to these issues’ pervasiveness, lingering consequences, and complexities.

Moving forward, all of us, and especially anyone who holds a leadership position at USC, will be held to a higher standard, one that lives up to our core values, our Code of Ethics, and an enhanced culture change on our campuses. Whenever our university has had to deal with a major incident, our philosophy as a community has not wavered: learn from the experience and the mistakes made, and make sure we do better in the future.

Our path forward is clear. Our core values must be a means of creating and sustaining an environment of trust and fairness. To this end, I formally announce the establishment of the President’s Campus Culture Commission, co-chaired by Paula Cannon, a former president of the faculty and a distinguished professor of molecular microbiology and immunology at our
Keck School of Medicine, and John Gaspari, a staff member in our human resources division who serves as the executive director of the USC Center for Work and Family Life. This commission will report directly to me, and I will work closely with its co-chairs and members. Varun Soni, our dean of religious life and the head of our Office of Campus Wellness and Crisis Intervention, will be a special advisor to this commission. I am in the process of recruiting members, consisting of faculty and staff from both campuses, and the full composition will be announced before the beginning of the academic year.

The commission’s charge is to provide advice to the university’s senior leadership, and to assess the execution of the action plan we share with you today. Its work will be ongoing, and will begin at the start of the academic year with a half-day retreat, which will be attended by the university’s entire senior leadership, all deans, academic department chairs, directors of institutes, as well as other members of our community, drawn from both campuses. It will also include the executive boards of both the Academic Senate and the Staff Assembly.

Beyond the President’s Campus Culture Commission, we must move quickly and decisively to establish an improved culture, one that is based on equity, professionalism, and ethics. This will be a culture of Care, Concern, Consultation, and Compliance—four cornerstones that we will describe in greater detail in subsequent sections. With this in mind, we must develop coherent and centralized systems for receiving and handling—in a timely manner—complaints of any nature. And we must ensure protection when possible for anyone who steps forward with a complaint. This protection extends to any persons who are witnesses and are willing to share information regarding a complaint, as well. We must be committed to bringing issues that affect our environment to light, and hold each other accountable for living up to our core values. Retaliation against those who come forward will not be tolerated; indeed, discretion, transparency, and accountability must define our response. At USC, our ultimate goal is to maintain the highest standard among all universities.

At the same time, we must never forget our university’s mission—that will never change. Our mission guides our work: to educate our students; to create new knowledge through research and creative work; and to take good care of our patients.

Today, we take a significant step forward. At the request of the board of trustees, my senior leadership team and I prepared a wide-ranging action plan to revisit our core values, revise our existing employment policies, and improve our campus culture, as well as to implement a major restructuring of a number of the university’s operations. Our action plan reflects the recommendations and feedback from four distinct areas. (1) First, it directly and comprehensively answers the external review prepared by the law firm, Gibson Dunn. (2) Second, it incorporates considerable input from the university’s internal Task Force on Workplace Standards and Employee Wellness. (3) Third, it addresses new lessons learned from the recent matter involving our student health center. (4) And finally, it places all of these recommendations within the context of larger, national discussions currently taking place. In this
way, the action plan we present today reflects a truly collaborative and broadly informed effort, one that draws on the rigorous observations of an external law firm, but also benefits from the far-reaching insights of those who best know our community: the faculty, staff, and students who spend each day at USC.

In this collaborative spirit—and as you absorb the changes and initiatives of the action plan—I will add: each one of us has a role moving forward. Recently, we have received direct feedback from the executive boards of both the Academic Senate and the Staff Assembly, and this has been tremendously helpful. Additionally, we will refine this action plan based on input we receive from you, members of the USC community. Our environment is only as strong as our character, and we all have a shared commitment to upholding—and even championing—our core values. We ask that you read the following action plan very carefully, and that we collectively rededicate ourselves to an ethos rooted in respect, compassion, and inclusion.

Part I: Revisiting the university’s core values and changing the campus culture

At the very foundation of our improved campus culture will be a commitment to change—enduring change that results in an atmosphere that elevates professionalism and character. Four cornerstones will define this change, as we embrace a culture of Care, Concern, Consultation, and Compliance. These four words—distilled as cornerstones of our action plan—emerged from discussions among the members of our Task Force, led by the respective presidents of the Academic Senate and the Staff Assembly.

Care speaks to wellness. It is critical that our faculty and staff are mindful of their wellbeing, and seek help when they need it. This will decrease the chances that they will end up in situations in which they compromise their commitment to our Code of Ethics.

Concern speaks to an atmosphere in which we look out for one other. In such an atmosphere, anyone should express any type of concern—not just complaints—about faculty or staff, and the result should be compassionate intervention. Our goal is to help members of our community to correct their behavior before it negatively affects others, and long before compliance becomes the only option.

Consultation speaks to the prioritizing of candid discussion, and the respectful exchange of opinions. For this, we must strengthen our leadership model, and listen to those around us, particularly if we are in management positions or serve as role models for others. This can be achieved through shared governance and through 360-degree evaluations.

Compliance speaks to the fulfillment of these values, and how well we implement our action plan. This is an ongoing process, and requires feedback from our community, as well as continual adjustments and self-examination. In many ways, compliance is the most critical point among these cornerstones: without it, the previous three points are just promises. Compliance ensures that we live up to these promises.
Our success will not be measured with numbers and response rates, but rather in how we are treated on our campuses, and how we treat each other. We will continually ask the question: does our community’s culture nourish our intellectual and creative growth, foster an inclusive atmosphere, and support our personal wellbeing? Success in this area is an ambitious undertaking with a longer-range view, and will require us to consistently reexamine and refine our approach as our culture evolves. As always, throughout the process, we will seek to maintain the highest national standards.

We wish to emphasize that this process answers a specific recommendation from the Task Force, which advised that the university should engage in an employee-wide process to revisit our core values, identify these values as precisely as possible, and then instill those revised values into the university’s cultural fabric. In doing so, we have exceptional resources on which to draw, as our professional staff is already deeply engaged in compliance and concerns issues, and has developed the relevant expertise. To this end, the head of our compliance office will be elevated to vice president of ethics and compliance to emphasize the growing importance of culture and compliance in all our endeavors, and she will be the staff professional tasked with working with all constituents to advance the culture change.

This process could take many forms, and we have interviewed a number of consultants to potentially assist us in this process. As one possibility, this may begin with an online assessment through which all of our employees weigh in on what our values and culture should be—and, based on this collective input, we prepare a single statement. As a later phase of this process, we would extensively train all employees, starting at the top with the senior leadership team and working our way through our entire university community. In addition, programs could be put in place to ensure that core values and behavioral expectations are part of the onboarding process and are continuously reinforced throughout the workforce. This is a multi-year, continuing process whose path forward is less defined, but our commitment to the journey itself speaks to the seriousness with which we advance.

I. Code of Ethics

As our first step, we will redraft our existing Code of Ethics, so that we can be confident the document reflects the ideas we hope to embody in the coming years and decades. In doing so, we will examine its content from a broader perspective, one that listens closely and carefully to contemporary national discussions, and places these discussions in the context of today’s complex world. All faculty and staff will soon receive a copy of our current Code of Ethics for review and acknowledgment.

As a world-class academic institution, we must always strive to be better. Excellence in character is just as critical to success as excellence in our teaching, research, artistic, clinical, and other professional endeavors.
If you are concerned about suspected violations of law, university policy, or USC’s Code of Ethics, you can report the matter anonymously through USC’s Help and Hotline at (213) 740-2500 or http://ooc.usc.edu/how-to-use-help-hotline/

If you are concerned about a fellow Trojan challenged with personal difficulties, you can report the situation privately and anonymously through Trojans Care for Trojans: http://studentaffairs.usc.edu/trojans-care-for-trojans-tc4t/

We can only build the community we desire if we are each willing to stand up and speak out when the moment calls for it. We will demonstrate commitment to our culture of values and ethics through annual training of faculty and staff, and by incorporating our values into the onboarding process for new employees.

My sense is that our deeply ingrained values will remain constant. However, if the past several months have taught us anything, we now know that the standards by which we measure our faithfulness to those enduring values will and should evolve as new issues concerning workplace conduct and professionalism are brought to light. To address the need to stay current, and as recommended by the Task Force, the Campus Culture and Wellness Council (CCWC) will monitor and advise on evolving standards. We will also continue to monitor national trends to assess their application to, and implications for, our institution.

II. Co-worker Observation Reporting System (CORS)
In an effort to ensure that any and all concerns regarding unacceptable workplace behavior or conduct are expressed and acted on, we are exploring the applicability of the Vanderbilt Co-worker Observation Reporting System (CORS), as recommended by the Task Force. This reporting system will address the types of concerns that currently do not have a clear structure for handling. Some of these concerns may relate to the wellbeing of individuals in the USC community, while others may be manifestations of a lack of respectful communication among coworkers, a lack of professionalism, or other toxic behaviors.

CORS is a peer-based reporting model—currently geared to the medical enterprise—that records concerns centrally. These concerns are then evaluated by a select peer committee that proposes one of a range of possible responses, based on an analysis that compares the action/issue reported against a community-agreed-upon baseline.

At its core is a model of peer-to-peer interaction for educating and alerting individuals when a co-worker complaint has been generated. For less serious situations, a “cup of coffee” conversation allows the individual who has been reported to receive feedback from a peer-messenger who has been trained in sharing these types of concerns. Although the CORS-system is a centralized structure for addressing concerns, the reports are not sent to the individual’s direct supervisor, but are instead handled in a manner that encourages self-correction, after the issue has been raised in a less-threatening manner, such as a “cup of coffee.”
When co-worker complaints exceed a predetermined threshold, suggesting that an individual is unwilling or unable to self-correct, or when a concern is sufficiently severe, an escalation occurs. Higher levels of intervention follow, and include progressively more involvement by supervisors, department heads, or senior level administration.

CORS is presently used in hospital settings nationwide, including our own Keck Hospital. My leadership team and leaders of the Academic Senate and Staff Assembly are meeting with the group that created CORS to discuss ways to adapt that system for our general community. If successful, USC will be the first university in the country to use CORS outside of the hospital setting.

There are clear benefits to adapting this system for our academic community. Some issues do not require escalation, and the potential for self-correction through a peer-to-peer meeting, or a “cup of coffee” conversation, can resolve these issues effectively and efficiently, with enduring changes in behavior. Another important aspect of the CORS system is the creation of a database to compare concerns, and to use these comparisons to determine the best way to handle them. The CORS system has been in hospitals for more than 20 years and has generated thousands of data points regarding specific behaviors in a hospital environment. Currently, when a concern is raised through the CORS system at our own Keck Hospital, it is sent to Vanderbilt, where it is analyzed using this database and the optimal manner to handle the concern is then determined.

Possible responses range from peer-to-peer consultation to educate and alert the individual to the reported concern, to direct and swift action by senior leadership as necessary. This is a tangible example of the university’s commitment to enhancing its campus culture, and another example of our larger ambition to set a new standard for all universities, and to become a national leader in confronting workplace misconduct.

**Part II: Revisiting the university’s operational structure**

**I. Office of Professionalism and Ethics**

We will establish an Office of Professionalism and Ethics (OPE), which will be led by the new vice president of professionalism and ethics, who will report to the senior vice president and general counsel. OPE will serve as a centralized, single center for all university complaint monitoring and investigation.

As a “one-stop shop” at the university, OPE will receive complaints at all levels across both campuses. In establishing its structure, we adhered to a number of points:

- Faculty and staff will be able to report complaints directly to OPE;
- All leaders (including faculty) who receive a report, or who have something to report, must tell their supervisors and submit a report to OPE, or face sanctioning;
- OPE will interface with existing offices throughout the university that collect and compile complaints in specific areas; and
- OPE will maintain an anonymous and confidential hotline for additional complaint reporting.
Given its centralized nature, OPE will be positioned to maintain a single database for tracking all complaints across the university, to draw connections between any complaints, and to respond more swiftly when necessary. Its positioning will also allow it to streamline the entire process and ensure greater accountability. It will also use the information it gathers to evaluate trends and high-risk situations for the university.

On a monthly basis, OPE will report on any open high-risk investigations to the president’s cabinet. And on a semi-annual basis, it will report on any trends that are emerging among the complaints to the president’s cabinet. With these regularly scheduled updates, OPE will ensure that high-risk investigations reach the highest levels of the university’s senior leadership in a timely manner. The new vice president will also have direct access to the chair of the audit and compliance committee of the board of trustees in order to ensure independence and transparency.

A. OPE and its centralized structure
In the area of complaint monitoring, Figure 1 illustrates the centralized flow of OPE’s structure, while the following descriptions clarify the portfolios of each office and unit under OPE’s umbrella:

*Figure 1*
1. Title IX

- USC’s Title IX office is responsible for investigating and responding to all reports of protected class misconduct in which the alleged offender is a student. This office also investigates retaliation related to reporting this type of misconduct.
- This includes complaints concerning sexual harassment—such as sexual assault, domestic violence, and stalking—and discrimination, as well as retaliation for reporting these complaints.
- This office also handles harassment and discrimination by students or student organizations based on any legally protected class—such as race, ethnicity, religion, and disability.
- Some examples of these complaints might be:
  - A student alleges that his or her teaching assistant has made unwanted sexual advances;
  - A male student complained that a certain scholarship is only for women;
  - A complaint that a student leader was denied access to resources based on his or her gender identification;
  - A person alleges that he/she is the victim of domestic violence committed by a USC student;
  - A person alleges that he/she was incapacitated by alcohol and/or drugs, and therefore unable to consent to sexual activity with a USC student;
  - A person alleges that he/she was sexually harassed or assaulted by a USC student;
  - A person alleges that a USC student is stalking him/her, and persists in sending unwanted social media messages, texts, and emails; and
  - A person alleges that a USC student filmed him/her during sexual activity without consent.

2. Office of Equity and Diversity

- The Office of Equity and Diversity (OED) is responsible for overseeing the university’s compliance with state and federal laws relating to—as well as investigating and responding to—complaints by faculty, staff, students, and applicants who believe themselves to be harmed by staff or faculty by harassment or discrimination related to certain protected characteristics. OED handles reports in which the alleged offender is staff or faculty.
- These protected characteristics include race, color, national origin, ancestry, religion, sex, gender, gender identity, gender expression, sexual orientation, age, disability, medical condition, marital status, pregnancy, veteran status, genetic information, and any other characteristic that may be specified in laws or regulations.
- Some examples of these complaints might be:
  - A faculty member claims that she was denied tenure based on her ancestry;
  - An employee applicant claims that she was denied a job based on her pregnancy;
  - A student alleges that a professor has failed to accommodate his disability during a final exam;
  - An employee claims her supervisor or a co-worker sexually harassed her;
An employee complains that she was retaliated against by her supervisor after participating in an OED investigation alleging race discrimination against the supervisor;

A student complains that a faculty member sexually harassed her;

An employee who returned from serving in the military complains that he was unfairly denied job placement at the university upon his return;

An employee claims that he was passed up for promotion due to his age;

An employee claims his department failed to accommodate his request for religious or disability accommodation;

A former student complains that she was sexually harassed by a current faculty member; and

A former student complains that an adjunct faculty member sexually assaulted her by exceeding the bounds of her consent to sexual contact.

3. Office of Conduct, Accountability and Professionalism

- The Office of Conduct, Accountability and Professionalism (CAP) was announced last October, and has been tasked with investigating concerns about workplace conduct, including violence in the workplace, that fall outside the strict purview of existing investigative units.

- In practice, CAP will investigate complaints that do not relate to Title IX or a protected characteristic, such as conduct that violates our policies against bullying and intimidation.

- Some examples of these complaints might be:
  - Students complain that their professor comes to class inebriated;
  - An administrative assistant complains that his direct supervisor is demeaning and throws things when angry;
  - A faculty member complains that his dean chooses favorites based on area of research; and
  - A faculty member is concerned that her colleague may be abusing illegal substances on campus; and
  - An employee complains that his supervisor retaliated against him for making a non protected class wage and hour or whistleblower complaint.

4. Athletic Compliance

- The Office of Athletic Compliance is dedicated to assisting all coaches, student-athletes, athletic department staff members, USC faculty and staff, former and future Trojans, and all supporters of Trojan Athletics as they strive to comply with rules applicable to intercollegiate athletics.

- In addition to educating these groups about applicable rules, Athletic Compliance is responsible for monitoring, addressing, and investigating all potential violations of NCAA and Pac-12 rules.

- When necessary, Athletic Compliance reports infractions and oversees the imposition of any remedial action.
Some examples of these complaints might be:

- An anonymous complaint that a student-athlete has received money from someone connected to the USC community in violation of NCAA rules;
- A complaint that an assistant coach is providing a prospective future Trojan’s family with inappropriate benefits to recruit him to USC;
- A reporter says he is working on a story that a high-profile student-athlete’s family has been accepting gifts and/or money from an agent;
- An anonymous complaint that an assistant coach is accepting money from an agent in exchange for steering a student-athlete to that agent;
- A complaint that student-athletes are being asked to practice or work out in excess of the time allowed by NCAA rules; and
- An allegation that a USC coach has had contact with a potential recruit outside of the times allowed by NCAA rules.

5. Compliance

- The Office of Compliance is responsible for overseeing the university’s compliance program, which includes investigating possible regulatory and university policy violations such as:
  - conflicts of interest;
  - misconduct related to research grants;
  - violations of healthcare billing guidelines;
  - data privacy breaches in, for example, medical, student, or financial records; and
  - violations of U.S. export control regulations, the Foreign Corrupt Practices Act, or economic and trade sanctions regulations.

- In addition to performing investigations and ensuring appropriate enforcement and corrective action, the Office of Compliance is responsible for:
  - conducting periodic risk assessments;
  - implementing policies and programs in response to new laws, regulations, and industry trends that present significant legal, financial, and/or reputational risk for the university;
  - providing training and education to the university community; and
  - conducting internal monitoring and auditing.

- Some examples of these complaints might be:
  - A claim that faculty physicians are committing insurance fraud;
  - A complaint about a dean hiring his son’s company to plan and host a school event;
  - A complaint involving radiation safety and associated regulatory components;
  - A claim involving regulations implemented by the Office of Foreign Assets Control, such as export control;
  - A complaint that an employee improperly accessed the medical record of a high profile patient in violation of HIPAA;
  - A complaint that a faculty member inappropriately charged government grants for travel expenses for his spouse;
A complaint that a faculty member claimed 100 percent effort at USC while also claiming 100 percent effort at a foreign institute;  
A complaint of inaccurate billing by a USC clinical operation; and  
A complaint that a faculty member claimed authorship for a student’s work or improperly denied authorship credit to a student.  

While the Office of Compliance will continue to investigate these matters, it will coordinate and report investigation results to the Office of Professionalism and Ethics (OPE) for oversight and monitoring.

The Office of Compliance is also tasked with leading the redrafting of the university’s Code of Ethics, and defining and instilling a culture of values and ethics throughout the university.

While the Office of Compliance will continue to investigate these matters, it will coordinate and report investigation results to the Office of Professionalism and Ethics (OPE) for oversight and monitoring.

6. Audit Services  
The Office of Audit Services is responsible for assisting university management with risk mitigation strategies with the objective of improving business processes and internal controls, as well as facilitating strong stewardship and management accountability at all levels.  
In addition to carrying out the university’s annual internal audit plan together with the university’s outside audit service provider (EY), the Office of Audit Services investigates complaints concerning accounting misappropriation and internal controls issues.

Some examples of these complaints might be:  
A complaint that a faculty member has submitted false expense reimbursement requests;  
A complaint that an administrative assistant set up a fake company and paid herself speaking fees from the school funds;  
A complaint that a staff member was improperly reimbursed for personal travel;  
A complaint that a faculty member used his own company as a USC vendor;  
A complaint that an employee was taking items from the USC Bookstore without paying for them;  
A complaint that facilities employees were stealing medical equipment from a USC-owned warehouse and reselling the equipment for their personal gain; and  
A complaint that an employee falsified materials for a conference that did not exist and then sought reimbursement for conference expenses.  
Audit Services will continue to investigate these matters, but will report investigation results to the Office of Professionalism and Ethics (OPE) for oversight and monitoring.

7. Student Judicial Affairs and Community Standards  
The Office of Student Judicial Affairs and Community Standards (SJACS) is responsible for investigating and responding to complaints from the university community related to violations of the university’s Student Conduct Code.
• Following the investigation of a complaint, SJACS will enter into a Voluntary Administrative Review with the student, dismiss the case against the student, or if the student denies the allegations, conduct a Summary Administrative Review.

• SJACS is also responsible for assessing any sanctions deemed warranted against a student, which may include, without limitation, educational classes, warning, disciplinary probation, service, restitution, removal from university housing, grade sanctions and or removal from a department, revocation of degree or revocation of admission, suspension, and/or expulsion.

• Some examples of these complaints might be:
  o A student is accused of coercive disruption due to his protesting with signs that threaten the safety of other persons on campus;
  o A student is accused of stalking another student;
  o A student is accused of cheating on an exam or of plagiarism;
  o Two students are accused of physically fighting on campus;
  o A student is accused of underage alcohol consumption;
  o A fraternity is accused of hazing;
  o A student group fails to secure appropriate approval prior to hosting an event that serves alcohol; and
  o A student complains that a classroom on campus has been vandalized.

• SJACS will continue to investigate these matters, but will ask the Office of Professionalism and Ethics (OPE) for additional resources and, as needed, help in high risk matters, such as hazing.

• SJACS will report all investigation results to OPE for oversight and monitoring.

B. OPE and the investigation of complaints

As mentioned above, in directing OPE, the vice president of professionalism and ethics will report directly to the senior vice president and general counsel. This is a critical point, as we must remain vigilant in protecting the privacy rights and confidentiality of our employees, while also ensuring the rights of the accused and enforcing and upholding the core values of our community. OPE will be responsible for ensuring balanced and fair responses to both complainants and respondents, and providing prompt and efficient investigation of complaints.

In investigating complaints, OPE will have direct oversight of our current investigatory offices: Title IX; the Office of Equity and Diversity (OED); and Athletic Compliance. OPE will also oversee the Office of Conduct, Accountability, and Professionalism (CAP), which was announced last October, and which investigates concerns about workplace conduct that fall outside the strict purview of our existing investigative units.

In addition, beyond its direct reports, and as shown in Figure 1, OPE will coordinate and track conduct-related investigations for certain offices, namely Compliance, Internal Audit, and the Office of Student Judicial Affairs and Community Standards (SJACS). These three offices—whose portfolios expand well beyond conduct-related investigations—will maintain
their traditional reporting lines for all their other responsibilities. However, the vice president of professionalism and ethics will assign complaints to the appropriate office for review and investigation, as needed, and will oversee their management of incoming and assigned complaints. OPE will not oversee complaint investigations for the hospital medical staff; however, it will at times provide investigatory resources for this group, and include its findings among its reports.

Figure 2 illustrates the broad range of departments and units at USC with which OPE will directly partner in order to ensure all complaints made at the university are properly tracked and managed. These partnerships will expand as the university’s structure evolves. At its outset, OPE will work closely with Human Resources; the Department of Public Safety (DPS); the Threat Assessment Committee; a newly-created Office of Ombuds Services under the purview the Office of Campus Wellness and Crisis Intervention (CWCI); Faculty Judicial Affairs; Risk Management; Student Judicial Affairs and Community Standards (SJACS); and the Hospital Medical staff.
OPE will serve as a resource to ensure that all complaints are funneled centrally from these various other offices into OPE, and then assigned to the appropriate investigatory office for review and investigation, as necessary. OPE will manage the review and investigation, track outcomes centrally, and ensure proper post-investigation management.

OPE will also maintain a centralized database of all complaints and the outcomes of such complaints. This will enable the university to track complaints of different types against the same individual over time, and will also allow for trend analysis and other data analytics which can be used to inform training, increase safety and security at the university, and allow for better human resource management.

C. OPE and complaint processing (post-investigation)
While the Office of Professionalism and Ethics will oversee the intake, monitoring, and investigation of all complaints, it will not be involved in the disciplinary process. This will hold true for faculty, staff, and students. Each constituent will follow the university’s policies for disciplinary processes, which may vary depending on the nature of the complaint and the group in which the respondent belongs.

*Figure 3* outlines the flow for the disciplinary processes for five clearly defined groups at USC, while the description below describes these processes in greater detail. Specifically, the description clarifies the processes for (1) faculty, (2) hospital medical staff, (3) staff, (4) students, and (5) student cases involving Title IX.

*Figure 3*

**Post-Investigation Complaint Processing**

[Diagram of complaint processing flowchart]

- Faculty:
  - Faculty Committee
  - Appeals
  - Provost (if not tenure dismissal)

- Hospital Medical Staff:
  - Medical Executive Committee
  - Appeals
  - Hospital Governing Board

- Staff:
  - Human Resources
  - Appeals
  - Senior VP for Administration

- Students (Other):
  - Student Judicial Affairs & Community Services
  - Appeals (Automatic)
  - Vice President for Student Affairs

- Students (Title IX):
  - Faculty, Staff, and Student Panel
  - Appeals (Automatic)
  - Vice President for Student Affairs

* *All appeals other than tenure dismissal go to provost*
1. Faculty disciplinary process
For faculty, when disciplinary action is required, OPE will forward the results of its investigations to a newly formed faculty committee. This committee will supplant the university’s previous process, through which a vice provost determined sanctions after consulting with the president of the Academic Senate and the relevant dean. The new faculty committee will determine the appropriate discipline, up to and including recommendation of tenure dismissal. In all disciplinary decisions except a recommendation of tenure dismissal, appeals will go directly the provost. In cases involving a recommendation of tenure dismissal, a final decision will only be made after the formal proceedings set forth in the Faculty Handbook in section 8-D(2). As part of this process, the provost will first determine if formal dismissal proceedings should commence and, if they should, assemble a hearing board, comprised of three members of the Senate Committee on Faculty Tenure and Privileges Appeals. The president of the university will make the final decision regarding tenure dismissal.

2. Hospital medical staff disciplinary process
For complaints involving faculty or staff at a USC-owned hospital, in appropriate cases, OPE will provide the results of its investigations to the Hospital Medical Staff, which is a body within the hospital that is responsible by law for oversight of clinical care, including complaints against physicians. The Hospital Medical Staff—if it deems necessary—will investigate complaints further, and then provide the results to the Medical Executive Committee for disciplinary action. The Hospital Governing Board resolves all appeals from the Medical Executive Committee.

3. Staff disciplinary process
For staff, when disciplinary action is required, OPE will send its investigation results to the new vice president of human resources for a disciplinary decision after consultation with an advisory committee comprised of staff members. This position—and the scope of its responsibilities—are described in greater detail in the subsequent section. All appeals will be resolved by the senior vice president for administration.

4. Student disciplinary process
For students, in cases where OPE conducts an investigation, OPE will send its investigation results to the Office of Student Judicial Affairs and Community Standards (SJACS). This office is responsible for maintaining the integrity of the university’s student conduct system, and guarantees a battery of procedural protections for students. These include written notice of a complaint; a fair, impartial, and timely review of the incident; the right to inspect any documents and relevant information on file; the opportunity to be present at the review and to present witnesses and evidence; the right to an advisor; and a formal written decision following the complaint. All appeals will continue to be handled by situation-specific appeals panels, which issue decisions that are automatically reviewed (and approved or modified) by the vice president for student affairs. The vice president’s decisions are final and binding on all parties.
5. Student disciplinary process: cases involving Title IX

If the complaint involves Title IX, OPE will send its investigation results to the Misconduct Sanctioning Panel, which is comprised of two staff or two faculty, designated by the provost, as well as one undergraduate or graduate student, depending on the status of the student respondent. The OPE’s results will include a Summary Administrative Review, as defined by the university’s policy on Student Misconduct – Sexual, Interpersonal and Protected Class Misconduct. All appeals will continue to be handled by a three-person Appellate Panel, which includes at least one faculty member, appointed by the vice president for student affairs. The Appellate Panel’s decisions are automatically referred to the vice president for student affairs for final determination.

II. Vice President of Human Resources

In addition to the vice president of professionalism and ethics, we are creating a second new position at this level: vice president of human resources, who will oversee the centralization of our human resources operations. This position will streamline and strengthen these operations across both campuses, enabling us to increase the transparency and accountability in our processes. This position will also develop a university-wide strategy for hiring and maintaining the very best, most talented employees.

The creation of this position reflects our growth as a university. For many years, USC has relied on a somewhat unwieldy—and largely decentralized—network of school-based human resources offices. This restructuring will allow us to centralize personnel information across our many schools and units, thereby allowing the new vice president to implement six new strategic measures:

1. We will significantly strengthen the university’s reference checking process, as we vet candidates for employment positions. As part of this process, for all leadership positions, we will request authorized access to candidates’ former personnel files, and consolidate postings for these positions under the new vice president.

2. We will implement a much more comprehensive background check process for all new hires and promotions to leadership positions at a chair or director level position or higher at USC. This background check will be done with the written permission of the candidate as a condition of employment. This new extended background check will include checks on: criminal felony and misdemeanor convictions, federal bankruptcy, credit report, civil litigation, corporate affiliations, credential verification, motor vehicle record report, education degree and certificate confirmation, employment confirmation, global sanctions and enforcement check, newspaper and periodical search, public records search, professional license report, recorded judgment search, national sex offender registry search, social security number trace, and a tax lien search. This comprehensive background check will help ensure that the university has done its due diligence on its future leaders.
3. We will centralize and digitize the personnel files for all of the university’s 26,000 faculty and staff. While this is a massive, expensive undertaking, it is an important step in ensuring that the appropriate offices have immediate and consistent access to all relevant information on personnel. This is crucial in making management and disciplinary decisions.

4. We will create a Leadership Training Academy at USC. The academy’s training will emphasize our core values and the importance of bringing those values into the workplace, as well as provide the tools to address complex situations that arise every day in the workplace. In this way, the academy will not only model our core values, it will help us find ways to instill them in our work environment.

At the heart of its mission will be the notion of a responsible leader. Responsible leaders do not simply adhere to our core values; they exemplify and promote them, while maintaining a high minimum threshold for their personal standards, values, and integrity. Such leaders look out for those who work or learn under them—at all levels, regardless of whether they are faculty, students, or staff—by eliciting and attending to concerns they express, fostering an environment of wellbeing and fairness, and promoting growth and career development.

This academy is an entirely new initiative at USC, and will evolve as we receive feedback from participants. Its curriculum will focus on real-life examples in a variety of situations, and will address a cross-section of topics, including values and ethics, leadership and management, and complaint processes. We will strive to make the training as relevant and as useful as possible, and will require that all leadership positions at the university, including the senior officers, deans, and department chairs, go through the Leadership Training Academy at some point.

Specifically, the Leadership Training Academy at USC will be tasked with:

- Providing mandatory training for newly appointed leaders, as well as regular access to an executive coach during that leader’s first year.
  - This addresses the fact that many academic leaders have no formal training before their appointment, and that all leaders must develop these skills.
- Supporting the pipeline of future leaders at USC and ensuring the development of leaders from under-represented communities.
- Providing training that directly addresses any concerns that come out of the review of a leader’s performance.
- Developing a program of leadership training opportunities that are directed to a broad audience, encompassing all faculty and staff.
  - As part of this process, the academy might expand the university’s executive coaching opportunities, mentorship opportunities, and training around leadership competencies, and create a centralized repository for leadership resources from across the university.
Some examples of resources that currently exist: the Healthcare Leadership Academy, Women in Management, the Emeriti Center, and the Executive Education Program at USC Marshall.

5. We will instruct the office of the vice president of human resources to coordinate the onboarding of management across both campuses. This will establish a uniform process for welcoming new managers into our community, as well as a clear set of expectations and a recommitment to our core values. Each new member of management, as well as current employees promoted to management positions, will receive specialized training in standards for workplace management, as well as ongoing check-ins.

6. We have engaged an external consultant (KPMG) to recommend ways to improve the university’s processes for human resources. This consultant is familiar with the best practices of other human resources functions, and will bring a fresh perspective to our operations. It is likely that additional recommendations on how to improve and professionalize human resources at USC will come from this review, and will be implemented over the next year.

III. USC Office of Ombuds Services

We will establish the USC Office of Ombuds Services, which will provide a safe space for our community to address difficult workplace situations, and for our employees to seek impartial guidance on a range of work-related issues. This office will provide a strictly confidential forum in which to resolve various concerns, including miscommunication between coworkers, perceived unfair treatment, interpersonal conflicts, and academic concerns. It will also educate members of our community about university policies and procedures, such as the formal processes for filing complaints.

Ombuds Services will have a physical presence on both USC campuses. Its personnel will be trained to spot high-risk workplace situations, and—when required by law—report select matters to OPE for further review.

Ombuds Services will operate under the Office of Campus Wellness and Crisis Intervention (CWCI), previously established under Vice Provost Varun Soni. This office—recommended by the Task Force—promotes individual wellbeing among our community members.

IV. Senior Vice President for Communications

In addition to the two vice president positions announced above (of professionalism and ethics; and of human resources), we are creating the position of senior vice president for communications. This person will be part of the President’s Cabinet, attend our weekly meetings, and draw significantly closer ties between our communications office—and the offices of the university’s other senior vice presidents. As our university grows in stature and complexity—and as the media landscape evolves at an increasingly exponential pace—it is clear that this senior leader must be elevated in rank.
This reporting structure answers a very practical need. The university has grown significantly—just since I became president in 2010—and media outlets and news platforms that did not even exist then now operate at breakneck speed, producing stories and content around the clock. Further, the issues permeating higher education have increased significantly; sexual harassment as well as diversity, equality, access, and affordability are just some of the complex areas in which we must provide leadership in national discussions. A cabinet-level position will improve media coordination among the various components of our university, from our medical enterprise to our schools and research centers.

USC is the largest private employer in Los Angeles, and our economic impact exceeds $8 billion per year. We have a growing presence—not just in our city and region, but in our nation and around the world. There are so many consequential and compelling stories to be told about our scholarly and creative work, our medical enterprise, our community’s civic engagement, and our student-athletes’ successes. Sharing these stories effectively—indeed, promoting the good work we do every single day—is one of our university’s most significant priorities, making the new role of senior vice president for communications particularly central to the success of our mission.

**Gratitude and future directions**

I would like to conclude with a heartfelt reflection on the strength of our community. This past year, although challenging at times, has reminded all of us of the tremendous love and loyalty of our Trojan Family. As we have tackled difficult issues, our spirit, resilience, and character have shone through—time and again. We are fortunate to have each other, and we inspire one another to evince the very best qualities we have as humans, and to share those qualities with our fellow Trojans.

In this spirit, I would like to thank our board of trustees for its thoughtful stewardship of our university. I also wish to thank Paul Rosenbloom, president of the Academic Senate, and all of the extraordinarily dedicated members of the Academic Senate. Additionally, I warmly thank Jeffrey de Caen, president of the Staff Assembly, and his deeply committed colleagues. Professor Rosenbloom and Associate Dean de Caen also co-chaired the Task Force on Workplace Standards and Employee Wellness, and I would like to acknowledge their outstanding leadership of that group, as well as the stellar work of its members. Collectively, they have brought passion, integrity, and imagination to this process. Finally, with profound gratitude, I would like to acknowledge Debra Wong Yang and her colleagues at Gibson Dunn. Their detailed and thorough report served as the starting point in creating our action plan. This is a process—one we begin in earnest today—and these individuals laid its foundation.

Seeing this as a process is crucial. As a university, whenever we have faced a challenge, we have learned from it and moved on—ultimately becoming stronger and better than before. With your continued commitment, and with the support of the fundamental changes and robust initiatives announced today, we will do just that. Our unequivocal goal is to maintain the highest standards for universities throughout the nation.
This lofty ambition must drive us. In aiming high, we will achieve our best results, but we must remember that the loftiest of goals are not unattainable, but rather well within our grasp. After all, working together, we have built a world-class university, one that educates outstanding students from all walks of life, one that advances consequential work throughout the world, and one that boasts a network of alumni and friends that touches every corner of the planet. In exceptional ways, our research transforms lives, our scholarship advances thought, and our creative work inspires humanity. We uplift communities with our public service, and we better lives with our healthcare services and our commitment to civic growth. It is this unshakable dedication—this uniquely Trojan spirit—that has always guided our work, and will surely elevate our efforts as we move forward.

Sincerely,

C. L. Max Nikias
President