



Office for Civil Rights and
Title IX Education and Compliance
MICHIGAN STATE UNIVERSITY

BIENNIAL REPORT

2023-24 & 2024-25 ACADEMIC YEARS

TABLE OF CONTENTS

FROM THE VICE PRESIDENT3

OCR SNAPSHOT4

- HOW WE GROUND OUR WORK.....4
- HOW WE STRUCTURE OUR WORK.....5

OCR BRANCH UPDATES.....7

- OFFICE OF THE VICE PRESIDENT BUSINESS
AND COMPLIANCE SERVICES.....7
- INVESTIGATION, SUPPORT AND RESOLUTION.....9
- OFFICE OF THE ADA COORDINATOR.....10
- PREVENTION, OUTREACH AND EDUCATION.....12

ENVISIONING THE FUTURE.....14

PARTNER ACKNOWLEDGMENTS.....15



FROM THE VICE PRESIDENT

It is a privilege to share the inaugural biennial report from the Office for Civil Rights and Title IX Education and Compliance, or OCR.

Since joining MSU in summer 2023, I've seen the drive, collaboration, and commitment of individuals across our community who work every day to advance civil rights. This report reflects not only the progress we've made, but the shared values and partnerships that continue to shape our path forward.

Beginning with this publication, OCR plans to release a comprehensive biennial report in odd years and a brief update in even years. In addition, we're pleased to announce the launch of our new dashboard that shares data on a semesterly basis on our website civilrights.msu.edu.

In collaboration with university partners, OCR completed all five strategic priorities outlined in our 2023-24 Strategic Operations Report, launched new initiatives in 2024-25, and introduced a Strategic Framework aligned with the MSU 2030 strategic plan. These accomplishments show what's possible when we lead with collective intention and act in partnership.

Advancing civil rights—and meeting our legal obligations—is a shared responsibility that demands ongoing attention, care, and investment at every level of our institution. This work is never finished; it requires continual reflection, learning, and improvement. Together, we remain steadfast in building a university community where these principles are lived, not just aspirational.

As we focus on what is ahead, our commitment remains clear: to advance MSU's mission by fostering a safe, inclusive; and accessible environment grounded in a culture of respect that is free of discrimination.

I'm grateful to the OCR team for their dedication and to our many collaborators across campus who help drive this work forward. Your insight and engagement are essential to our progress.

With Spartan spirit,

Laura Rugless, JD

Vice President and Title IX and Title VI Coordinator
Office for Civil Rights and Title IX Education and Compliance

OCR SNAPSHOT

At MSU's Office for Civil Rights and Title IX Education and Compliance, or OCR, our mission is to advance civil rights through the multidisciplinary approach of policies and processes; incident response and resolution; prevention and education; data collection and analysis; and culture and community. We carry out our mission by:

- **Engaging with the MSU community** to share the rights and responsibilities that come with being a Spartan. This includes the biannual Notice of Nondiscrimination which shares out the key civil rights policies implemented by OCR.
- **Equipping students, faculty and staff** with the knowledge and tools they need to prevent, recognize and report all forms of discrimination and harassment.
- **Responding to reports** of discrimination and harassment, including gender-based violence, with support, equity and integrity, seeking to provide a just resolution that ensures access and centers on the well-being of those involved.
- **Removing any barriers** that prevent individuals from fully participating in MSU's programs, services and activities. Through the collection of data, we are beginning to refine our initiatives, striving to build a community that is proactive in addressing these issues.
- **Connecting** those affected by discrimination and harassment with the support they need — both on campus and within the broader community.

At the heart of our work is a deep commitment to creating a safer, accessible and more supportive environment for all.

HOW WE GROUND OUR WORK

We have grounded OCR's work in MSU's shared values. They guide us, shaping how we continually seek to serve the university community with dedication and care.

These values — integrity, respect, collaboration, equity and excellence — are the foundation of everything we do, safeguarding our community through policy compliance, support, information and empowerment.

VALUES

INTEGRITY

We foster trust by acting with honesty, consistency and transparency. Our commitment to integrity means we respond promptly, uphold objectivity and ensure our words align with our actions across all processes, programs and reporting.

RESPECT

We cultivate a culture of respectful communication by prioritizing trauma-informed, identity-conscious and culturally competent practices. We champion accessibility in all forms, ensuring every member of our community can engage fully and equitably.

COLLABORATION

We strengthen our impact through meaningful partnerships and shared learning. By working across offices and disciplines, we promote open dialogue, mutual understanding and coordinated efforts that advance civil rights across the university.

EQUITY

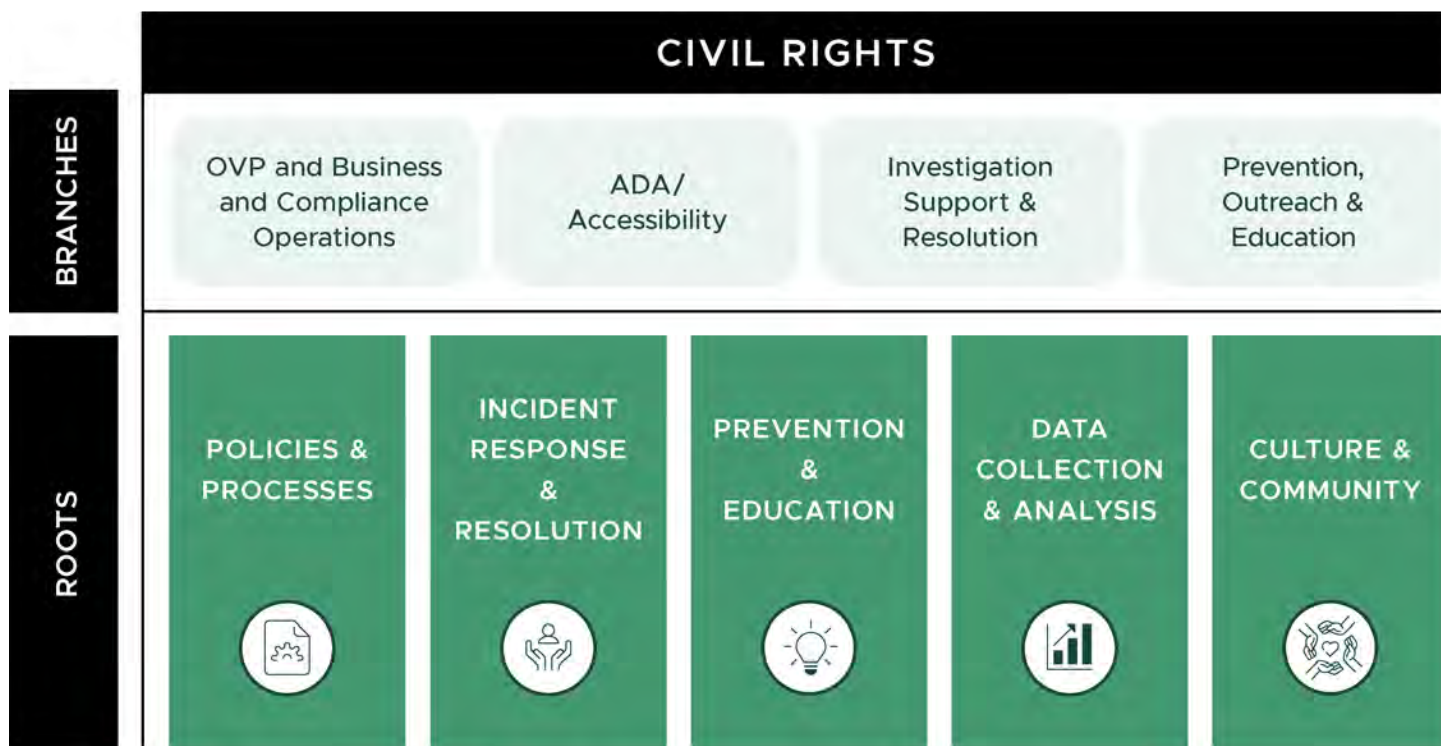
We uphold fairness and consistency in every aspect of our work. Our commitment to equity drives us to meet individual needs and deliver services that reflect the highest standards of care and accountability.

EXCELLENCE

We pursue excellence through innovation, responsiveness and continuous improvement. By recognizing our team's contributions and leading in accessibility and prevention programming, we set a national standard for civil rights work in higher education.

HOW WE STRUCTURE OUR WORK

Established as a stand-alone office in 2018, OCR was structured to report directly to the president of Michigan State University, a design recommended by the Relationship Violence and Sexual Misconduct, or RVSM, Expert Advisory Workgroup. In 2023, the vice president position was created to further reinforce the university's commitment to advancing civil rights at the highest levels while maintaining the independence and confidentiality of investigative processes.



OCR consists of four separate, yet interconnected, branches. Each branch supports a core area of focus extending throughout MSU to promote civil rights across the university:

- **The Office of the Vice President and Business and Compliance Services (OVP)** manages the internal workings of the organization, ensuring that it runs smoothly and complies with all legal and civil rights guidelines.
- **Investigation, Support and Resolution Department (ISR)** responds to and investigates reports of harassment and discrimination under MSU's civil rights policies with an approach grounded in support and equity.
- **The Office of the ADA Coordinator** facilitates compliance with applicable disability laws and regulations, ensuring equal access to services, programs and activities.
- **Prevention, Outreach and Education Department (POE)** engages and educates the MSU community to raise awareness, prevent harm, and foster a culture of empowerment and respect.

The four branches each execute on one or more of the five foundational functions of our office:

- **Policies and Processes** provide the requirements and guidelines that direct fair and equitable practices across MSU, maintaining accountability and transparency.
- **Incident Response and Resolution** delivers prompt and compassionate support, applying policies and processes to manage cases with care and attention for those involved.
- **Prevention and Education** develops and facilitates programs and initiatives that empower the community to shift attitudes, beliefs, behaviors, and norms with the goal of transforming our climate and culture to prevent future harm.
- **Data Collection and Analysis** allows for data-driven decision-making, helping to track progress, identify gaps, develop programming and continuously refine the office's strategies.
- **Culture and Community** Initiatives nurture an inclusive, welcoming environment where everyone feels valued, supported and empowered to participate fully in the life of the university.

Together, these branches and functions form a cohesive and comprehensive structure where the foundational work drives the outward-reaching efforts of our office. Through our efforts, and those of our colleagues across MSU, OCR supports the MSU community in continuing to grow and thrive while advancing civil rights for all.



OCR BRANCH UPDATES

OFFICE OF THE VICE PRESIDENT AND BUSINESS AND COMPLIANCE SERVICES



“Our Strategic Framework is more than a plan—it’s a commitment to building a civil rights infrastructure that is proactive, transparent, and deeply rooted in partnership. It ensures we’re not just responding to today’s needs but preparing for tomorrow’s challenges.”

Scott D. Jones, OCR chief of staff

Based on recommendations from the Data Consulting Group to strengthen OCR’s infrastructure, the Office of the Vice President and Business and Compliance Services was created in 2023. This restructuring introduced a chief of staff role to advance OCR’s strategic goals and coordinate internal operations. Led by the vice president in partnership with the chief of staff, this branch oversees finance and human relations functions, advising services, the equity review officer, the data and compliance team, and communications—supporting the ongoing development and refinement of MSU’s civil rights policies.

DEVELOPING AND UPDATING MSU’S CIVIL RIGHTS POLICIES

A core responsibility of OCR is leading the development and administration of MSU’s civil rights policies and procedures in compliance with federal, state, and local laws. To that end, OCR works with the Office of the General Counsel, or OGC, and MSU Government Relations to monitor legal developments and integrate feedback from partner offices, constituent groups, community stakeholders, and consultants as well as the Know More Campus Survey, to guide policy updates. Over the course of the 2023-25 terms, we were able to review and revise each of our six civil rights policies, specifically:

- The new Mandatory Reporting Policy for Relationship Violence, Sexual Misconduct, and Stalking was created from a protocol and approved and implemented in September 2023. It was recently updated in August 2025.
- The Relationship Violence and Sexual Misconduct and Title IX, or RVSM-TIX, Policy has been updated several times, most recently in August 2025 to reflect recent federal law enforcement definitional changes.
- The Anti-Discrimination Policy User Manual was updated multiple times, most recently in March 2025, to more clearly set forth the standards outlined in the policy including the addition of provisions regarding intersectional, intraclass, and associational discrimination and harassment.

- A new policy on Pregnancy, Childbirth, and Pregnancy-Related Conditions for Students and Employees was approved and implemented in February 2024.
- The Digital Accessibility Policy was revised in May 2024 to support university-wide compliance with applicable digital accessibility standards.
- The Disability and Reasonable Accommodation Policy was revised in August 2025, to clarify the roles and responsibilities of faculty, staff and students when requesting or implementing accommodations.

Throughout the revision of these policies, OCR has actively engaged with groups including the RVSM Expert Advisory Workgroup, student groups, and other MSU community stakeholders to ensure that an array of voices and expertise is reflected in policy development. OCR also continues to support national initiatives such as the National Association of Student Personnel Administrators, Culture of Respect and the National Academies of Sciences, Engineering and Medicine's, Action Collaborative on Preventing Sexual Harassment in Higher Education, which promote institutional capacity-building to end sexual violence.

In addition to the civil rights policies noted above, OCR is regularly involved in supporting related policy and process work in other units across the university. For instance, OCR was active in the Employee Religious Accommodations Workgroup which resulted in the development of HR guidelines that accommodate an employee's religious beliefs unless doing so is unreasonable or poses an undue hardship. Additionally, OCR leadership served on the workgroup that drafted and implemented MSU's Preventing Pass the Harasser policy, which strengthens hiring practices by screening candidates for professional misconduct, including sexual harassment, before employment decisions are finalized.

DEFINING OCR'S STRATEGIC FRAMEWORK

In late 2023, OCR launched a strategic planning process that culminated in the release of its first-ever Strategic Framework in November 2024. This framework, aligned with MSU's 2030 strategic plan, outlines a roadmap for continuous improvement, community engagement, and national and global leadership in civil rights. **The framework is organized around three core themes:**

1. DEVELOP

We are building the internal infrastructure necessary to support a high-performing, mission-driven organization. This includes:

- Strengthening OCR's internal culture and climate.
- Creating unified systems and communication protocols.
- Enhancing onboarding, training, and professional development for staff.
- Improving inter-branch collaboration and staff engagement.

2. IMPROVE

We are enhancing the university's civil rights ecosystem by:

- Delivering data-informed prevention and response services through regular assessment and continuous improvement.
- Fostering transparent communication and community feedback loops.
- Expanding outreach and education aligned with evolving legal and cultural needs.
- Launching an OCR data dashboard to support transparency and accountability.

3. ENHANCE

We are advancing civil rights at MSU through the leadership of our office by:

- Building meaningful partnerships across campus and beyond.
- Showcasing OCR's expertise through strategic communications and collaborations.
- Engaging nationally and globally to shape best practices in civil rights and Title IX compliance.

Each theme includes specific operational initiatives, tactics, and measurable outcomes, all aligned with MSU's strategic goals in student success, innovation, and sustainability. Together, these efforts ensure that OCR continues to evolve as a responsive, inclusive, and forward-thinking office that not only meets today's needs but anticipates tomorrow's challenges and opportunities.

INVESTIGATION, SUPPORT AND RESOLUTION



“People come to us in some of the hardest moments of their lives. Our responsibility is to meet them with empathy, clarity and fairness — and to never lose sight of the human side of this work.”

Rob Kent, assistant vice president, senior deputy Title IX coordinator and senior deputy Title VI coordinator

The Investigation, Support, and Resolution, or ISR, branch of OCR is dedicated to implementing MSU's civil rights processes effectively and compassionately. Over the past two years, ISR focused on three key areas to better serve the university community: implementing a new case management system, launching a coordinated response to the assessment of potential hostile environments, and developing an adaptable resolution process.

IMPROVING OUR CASE MANAGEMENT SYSTEM

Recognizing the need for a more advanced case management system with workflow and data reporting capabilities, OCR began implementation of the Guardian platform in December 2023. Since then, the ISR team has customized the system to align with MSU's unique processes and trained staff to ensure the system meets the needs of all community members.

This new system enhances internal workflows to improve the experience for individuals navigating the investigative process. In 2024-25, ISR leadership also developed a comprehensive case management guide that documents each step of the reporting, investigation, and decision-making process. This resource sets MSU apart from peer institutions and marks a significant milestone in promoting consistency, transparency, and care.

EXPANDING PROACTIVE RESPONSES

In alignment with Title VI of the Civil Rights Act of 1964, OCR remains committed to fostering an environment free from discrimination based on protected identities. To support this goal, OCR established the Hostile Environment Assistance Team, or HEAT, a cross-functional group that coordinates university-wide responses to reports of hostile environments.

HEAT includes representatives from student services, employee support units; and campus safety. The team meets regularly to review reports and determine appropriate remedial actions, which may include supportive resources, policy enforcement, educational programming, and other interventions. This initiative reflects MSU's proactive approach to civil rights compliance and its commitment to creating an inclusive campus climate.

BROADENING OPTIONS FOR RESOLUTIONS

Informed by feedback from the MSU community, ISR developed the Adaptable Resolution Process— a voluntary, non-disciplinary option for addressing reports of sexual harassment. This process is designed to stop harmful conduct, prevent its recurrence, and remedy its effects in a way that prioritizes the needs and safety of impacted parties.

Adaptable Resolution allows individuals to acknowledge harm and take responsibility without engaging in formal disciplinary proceedings. Depending on the circumstances, resolutions may include educational interventions, restorative justice practices, or other collaborative approaches. These methods are non-adversarial and empower participants to make informed, values-driven decisions.

The RVSM-TIX Policy was updated to include Adaptable Resolution, effective July 15, 2025. ISR is currently finalizing procedures and resources to help community members understand and navigate their resolution options.

For more information on ISR, the reporting and investigative processes, and the related policies, please visit OCR's File a Report website (civilrights.msu.edu/file-a-report/index.html).

OFFICE OF THE ADA COORDINATOR



“Every barrier we remove opens a door for every Spartan to fully engage, contribute, and belong.”

Tracy Leahy, ADA coordinator

Ensuring full access to MSU’s programs and services is a cornerstone of the university’s 2030 strategic plan and a foundational responsibility of the Office for Civil Rights, through the Office of the ADA Coordinator.

ENSURING MSU IS ACCESSIBLE

As part of this work, the ADA coordinator focuses on improving accessibility and maintaining compliance related to educational and employment programs, services, and activities, including web and digital compliance. Recent actions include:

- Revising the Disability and Reasonable Accommodation Policy in partnership with the Resource Center for Persons with Disabilities, or RCPD; Faculty and Academic Staff Affairs, or FASA; ISR; and HR. The revised policy became effective in August 2025.
- Planning and hosting MSU’s first Disability Summit (civilrights.msu.edu/ada_coordinator/disability_summit.html) on Sept. 20, 2024, in partnership with RCPD; and the MSU Libraries. This event fosters dialogue on accessibility and inclusion through keynote speakers, disability programming, and community engagement. The Second Annual Disability Summit (civilrights.msu.edu/ada_coordinator/2025-Summit.html) will take place on Oct. 3, 2025, with a keynote address by disability rights advocate Haben Girma as well as, virtual programming throughout the month of October to coincide with the celebration of Disability Pride Month programming at MSU.
- Developing a Guide to Planning and Hosting Accessible Events to promote inclusive event practices across campus.
- Deciding nine employee-, eight student- and two unit-initiated accommodation appeals in the most recent academic year.
- Completing 87 consultations with students, employees and units seeking information and advice regarding disability compliance during the 2024-25 academic year.
- Developing a required disability training in collaboration with RCPD, FASA, Human Resources, Education Technology, and Inclusive Excellence and Impact, or IEI, which is expected to rollout in Fall 2025.
- Reconvening the President’s Advisory Committee on Disability Issues, or PACDI, as a critical resource to MSU leadership in addressing disability matters within the MSU community.
- Updating the Digital Accessibility Policy to align with new federal regulations and compliance standards.

- Revitalizing the Digital Accessibility Liaisons program, which is composed of representatives from each major administrative unit who serve as a point of contact for digital accessibility compliance.
- Launching a Digital Accessibility Compliance Dashboard to provide Digital Accessibility Liaisons, unit leaders and others with data on course and website accessibility, training efforts, accessibility of videos and other compliance metrics.
- Revising the Equally Effective Alternative Access Plan to ensure equitable access to digital content.
- Implementing a website scanner to monitor the accessibility of MSU's websites, enabling units to promptly remediate inaccessible content.
- Compiling an inventory of 961 MSU websites.
- Transitioning MSU's Web Content Accessibility Guidelines, or WCAG, to version 2.2 AA, with a goal of full compliance by Jan. 1, 2026.

These efforts reflect OCR's unwavering commitment to ensuring that every Spartan can fully participate in the university experience.

For more information on the support and services provided by the Office of the ADA Coordinator, visit the office's website (civilrights.msu.edu/ada_coordinator/index.html) and the digital accessibility website (webaccess.msu.edu).

PREVENTION, OUTREACH AND EDUCATION



“Prevention is not a one-time program—it’s a sustained commitment to shaping a culture of respect, accountability, and care. Every workshop, every peer conversation, every training is a step toward a safer, more empowered MSU.”

Kelly Schweda, POE executive director

Since its inception, the Prevention, Outreach, and Education, or POE, Department within OCR has made significant strides in expanding its educational and engagement efforts. Guided by a mission to empower community commitment and prevent gender-based violence through education, outreach, and social change, POE is focused on providing university-wide programming. Today, it comprises two distinct units that collectively serve the entire MSU community.

ENGAGING WITH UNDERGRADUATE STUDENTS

Undergraduate Student Programs and Services, or USPS, remains central to POE's efforts to shape student culture. This unit delivers multiple initiatives including in-person prevention programming to first- and second-year students,

as well as to student-athletes and members of fraternity and sorority communities. Its initiatives challenge harmful norms and promote respect and accountability. USPS also coordinates more than 80 undergraduate peer educators who lead workshops and discussions on topics such as relationship violence, sexual assault, bystander intervention and supporting those impacted by harm.

SUPPORTING EMPLOYEES AND GRADUATE STUDENTS

This unit significantly broadens POE's reach by supporting MSU employees and graduate students. It provides targeted programming for individuals in field placements, internships, and externships—contexts that may present heightened risks for gender-based harm. The branch also leads new employee orientation sessions that introduce MSU's commitment to a safe and equitable workplace and houses policy training. Additionally, it houses the Climate and Response Unit, a pioneering initiative focused on addressing the impacts of relationship violence and sexual misconduct in both work and learning environments.

CELEBRATING MILESTONES AND REACH

POE's prevention and education efforts are designed to reach every Spartan—student, faculty, and staff. During the 2024–25 academic year, 46,997 Spartans completed required programming. In addition, 10,057 voluntarily participated in non-mandatory trainings such as Bystander Intervention, Understanding the RVSM Policy; and Navigating Mandatory Reporting. These numbers reflect not only the quality of POE's programming but also the community's shared commitment to fostering a culture of safety and respect.

The academic year 2023-24 also marked a significant milestone for POE and MSU's broader efforts to address RVSM as POE celebrated five years of service, while the university recognized 15 years of prevention programming. These anniversaries provided an opportunity to reflect on progress and renew MSU's commitment to inclusive, innovative and community-driven prevention work. POE continues to expand its outreach, develop new initiatives, and lead the charge in building a safer, more inclusive campus.

Going forward, POE remains steadfast in its mission. Through education, outreach and community engagement, the department continues to ensure that MSU is not only a place of learning, but also a place of safety, dignity, and respect for all.

For more information on prevention programs, initiatives, and outcomes, visit the POE website (poe.msu.edu).





ENVISIONING THE FUTURE

As we enter this new academic year, civil rights in higher education must remain a priority and OCR is committed to deepening our impact and expanding our reach across the MSU community. Guided by our Strategic Framework, we will continue to evolve our practices, strengthen partnerships, and lead with transparency and accountability.

In 2026, we will release a Strategic Framework Progress Update to share key milestones and insights. And in fall 2027, we will publish our next biennial report, offering a comprehensive view of our continued efforts to advance civil rights at MSU.

In the meantime, we invite the community to stay engaged through our new OCR Data Dashboard, (civilrights.msu.edu/data-dashboard/index.html), an interactive tool that shares data about ISR reports and cases, Office of the ADA Coordinator metrics and digital accessibility efforts, and POE programs. We will continue to grow the OCR Data Dashboard in years to come to continue serving the MSU community.

While this biennial report reflects the progress of the past two years, our work is ongoing. Together, we will continue building a university where every Spartan feels supported and empowered to thrive.



PARTNER ACKNOWLEDGMENT

Throughout this report, the importance of partnership in advancing civil rights at MSU is emphasized. OCR has the opportunity to work alongside offices, units, and groups that share our commitment to access, safety, and inclusion for all Spartans.

In addition to student organizations, we gratefully acknowledge the collaboration and contributions of the following, non-exhaustive, list of university partners:

Center for Survivors
Digital Accessibility Liaisons
Employee and Labor Relations, or ELR
Employee and Student Religious Accommodations Workgroups
Faculty and Academic Staff Affairs, or FASA
Freedom of Information Act, or FOIA, Office
MSU Athletics
MSU Educational Technology
MSU Department of Police and Public Safety, or DPPS
MSU Finance Office
MSU Health Care
MSU Human Resources, or HR
MSU Libraries
MSU Student Affairs
Office for Inclusive Excellence and Impact, or IEI
Office of Audit, Risk and Compliance, or OARC
Office of Health Sciences Human Resources
Office of the General Counsel, or OGC
Office of the President
Office of the Provost
Office of Student Support and Accountability, or OSSA
Office of the University Ombudsperson
President's Advisory Committee on Disability Issues, or PACDI
Resource Center for Persons with Disabilities, or RCPD
RVSM Expert Advisory Workgroup
University Communications and Marketing, or UCAM
University Health and Wellbeing, or UHW

Together, we support students, faculty, staff, alumni, and other members of the MSU community, especially those directly impacted by our processes, including parties seeking resolution. Their engagement and trust are central to our mission.



Office for Civil Rights and
Title IX Education and Compliance
MICHIGAN STATE UNIVERSITY

CONTACT

**Office for Civil Rights and
Title IX Education and Compliance**

408 West Circle Dr., Suite 105, Olds Hall
East Lansing, MI 48824

(517) 353-3960

ocr@msu.edu

civilrights.msu.edu

SUBMIT A REPORT

Both reports involving the Anti-Discrimination Policy and Relationship Violence and Sexual Misconduct and Title IX Policy may be filed online via the **Public Incident Reporting Form** (civilrights.msu.edu/file-a-report/index.html) or by calling ISR at 517-353-3922 between the hours of 8:00 a.m.-12:00 p.m. and 1:00-5:00 p.m. Monday through Friday.

Published: October 2025

