

Table C
Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Evaluate systemwide policies and practices on sexual harassment and determine whether the policies and practices are consistent with federal and state law and best practices.</p>	<ul style="list-style-type: none"> Based on interviews with system and campus officials, prior audits our office has conducted related to sexual harassment, and other information, identified a selection of federal and state laws and best practices and evaluated the systems' efforts to adhere to these requirements and best practices through our case file testing under Objectives 3c and 3d. Evaluated whether UC's and CSU's systemwide policies complied with key provisions in Title IX regulations and state law. For example, we assessed whether the systems' policies incorporated requirements from new statutes related to retreat rights, letters of recommendation, alternative resolutions, and settlements.
<p>2 Evaluate the efforts of each systemwide office to provide consistency in, and oversight of, how campuses within the respective system respond to complaints of sexual harassment and determine if the efforts of the systemwide office are adequate to prevent, detect, and address sexual harassment and are consistent with federal and state law and best practices.</p>	<ul style="list-style-type: none"> Interviewed officials at the UC Office of the President and the CSU Chancellor's Office and reviewed systemwide policies, procedures, and guidance to understand each system's oversight structure. Summarized each system's progress in implementing our prior audit recommendations. Reviewed the systemwide offices' compliance with federal and state law under Objective 1. Identified whether the efforts of the system offices were a possible cause for findings we developed related to our case file testing under Objective 3.
<p>3 Evaluate two campuses from the CSU and two campuses from the UC to determine the following:</p> <p>a. Whether existing campus policies and practices are adequate to detect, address, and prevent the reoccurrence of sexual harassment.</p> <p>b. Whether existing campus policies and practices are consistent with federal and state law and best practices.</p>	<p>Selected UC Irvine, UC Riverside, Cal Poly San Luis Obispo, and Sacramento State based on factors such as location, size, and whether we had previously audited the campuses.</p> <ul style="list-style-type: none"> Interviewed campus officials—such as Title IX office staff, CARE office representatives, and administrators responsible for student and employee discipline—to understand and document campuses' practices for detecting, addressing, and preventing sexual harassment. Primarily reviewed the adequacy of campuses' practices by testing case files under Objectives 3c and 3d. To assess campuses' efforts to prevent the reoccurrence of sexual harassment, we also selected eight respondents—two from each campus—who were the subject of multiple reports. Given the small selection size of these respondents and our other case review under Objectives 3c and 3d, we selected these repeat respondents judgmentally based on factors such as respondent type—for example, whether the respondent was a student or employee—and the number of reports involving each respondent. We then reviewed case files involving these eight repeat respondents to determine whether campuses took reasonable steps to address and prevent sexual harassment. <p>Evaluated whether the selected campuses' policies and practices were consistent with key legal requirements identified under Objective 1 and with other policy requirements and best practices as part of our case file testing under Objectives 3c and 3d.</p>

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AUDIT OBJECTIVE	METHOD
<p>c. Whether the investigatory process for sexual harassment complaints can be improved.</p>	<ul style="list-style-type: none"> • Collected data on reports of sexual harassment from the four selected campuses and performed data reliability analysis on the data for cases closed from August 1, 2022, through July 31, 2025, to produce summary counts. • Selected and reviewed 80 cases (20 per campus) that involved respondents who were students or employees and that the campuses closed from August 1, 2023, through July 31, 2025. We used a two-year period for our selection to align with our selection of discipline cases under Objective 3d and to ensure we reviewed cases that campuses had closed more recently. Our selection covered each phase of the case resolution process and included 40 cases closed without formal action, 20 alternative resolution cases, and 20 cases that proceeded to an investigation. We primarily used a random selection process within each campus's data to provide an objective view of the types of cases that campuses manage. For investigations, we stratified our selection to include three investigations at each campus in which the campus did not substantiate any policy violations, when campuses had enough of those cases to select. • For cases closed without formal action, assessed whether campuses followed requirements and best practices such as gathering relevant information, reaching out to complainants effectively, documenting clear rationales for closure, and implementing supportive or intervening measures when warranted. • For alternative resolutions, evaluated whether campuses' use of the alternative resolution process was appropriate given the parties involved and the nature of the allegations, whether the parties had voluntarily participated in the process and agreed to the final terms, and whether the terms themselves were effective at addressing sexual harassment. • For investigations, including those with hearings, evaluated whether campuses' investigation processes and outcomes were timely, thorough, and reasonable given the evidence in each case.
<p>d. For sexual harassment complaints that are substantiated following an investigation, analyze selected complaints within two years of the audit's initial date to assess whether the discipline administered was proportional to the conduct, effectively deterred future harassment, and was consistent.</p>	<ul style="list-style-type: none"> • Selected 20 cases with investigations that resulted in substantiated sexual harassment policy violations. We limited our selection to cases that campuses closed from August 1, 2023, through July 31, 2025. We selected the cases judgmentally, rather than randomly, for several reasons. For example, the population of discipline cases during the two-year period was smaller than the populations of other types of cases we reviewed, and we wanted to ensure that we reviewed discipline cases from each of the four campuses and cases that involved different types of respondents, because discipline processes can differ based on the type of respondent. We also wanted to compare similar cases to assess the consistency of the campuses' discipline. • Reviewed campuses' sanction decisions and related rationales in these 20 cases to assess whether the discipline was proportional to the respondent's conduct, consistent with discipline in other cases, and effective at deterring future sexual harassment.
<p>4 Review and assess any other issues that are significant to the audit</p>	<p>We did not identify any other issues to review during the course of the audit.</p>

Source: Audit workpapers.