

June 13, 2022

Board of Regents, University of Michigan
Fleming Administration Building
503 Thompson Street
Ann Arbor MI 48109-1340

Mary Sue Coleman
President, University of Michigan
1109 Geddes Ave.
Ann Arbor, MI 48109

Via e-mail c/o Vice President and Secretary of the University

Dear Board of Regents and President Coleman,

Enclosed please find Guidepost Solutions' high-level summary of recommendations and status update dated May 10, 2022.

The University of Michigan considered all of Guideposts' recommendations. As reflected on the Recommendations Summary Tracker, all of Guideposts' recommendations have been implemented, implementation is in progress, or alternatives to address the recommendations are currently being implemented. The University of Michigan has made significant progress on these important issues and the work on this journey will continue.

Sincerely,



Asha Muldro
Senior Managing Director
Deputy General Counsel

cc: Sally Churchill, Vice President and Secretary of the University

Enclosure

| GUIDEPOST SOLUTIONS' SUMMARY* OF RECOMMENDATIONS TO UNIVERSITY OF MICHIGAN – UPDATE | | |
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| # | Guidepost Recommendation | University Status |
| 1 | Adopt a University-wide policy on Protection from Retaliation | Complete SPG 601.90 https://spg.umich.edu/policy/601.90 |
| 2 | Adopt a policy regarding regulating relationships between supervisors and supervisees in the workplace | Complete SPG 201.97 https://spg.umich.edu/policy/201.97 |
| 3 | Hiring/promotion recommendations: | |
| 3.1 | Implement enhanced screening processes for promotions and new hires (this is a grouping of a handful of recommendations). | Substantially complete. Ongoing/In Progress. |
| 3.2 | Adopt additional questions to discuss with candidates, references, and prior employer(s) to help ensure that any prior history of sexual, gender-based or racial harassment or violence is identified. | Complete. |
| 3.3 | Evaluate review protocols for Dean appointments/reappointments. | Complete. https://www.provost.umich.edu/programs/Process%20for%20Dean%20Review-October%2020202021.pdf |
| 3.4 | Procure or develop searchable systems to assist with reviewing various databases for good faith reports and/or allegations of sexual and gender-based misconduct and retaliation. | Substantially complete. Review of various databases and files are currently being conducted. Ongoing/In Progress. |
| 4 | Ethics, Integrity and Compliance Services Recommendations: | |
| 4.1 | Develop a Code of Ethical Conduct that reflects the shared ethical values of the entire UM community and sets forth the expected standards of behavior in order to ensure that UM's shared values are implemented, followed, and are an integral part of the day-to-day lived experience of the entire UM Community. | Substantial work is in progress. Ongoing/In Progress. |
| 4.2 | Consider creating an independent Ethics, Integrity, and Compliance Services Office, led by a highly qualified Chief Ethics, Integrity, and Compliance Officer (hereinafter referred to EIC Office and Chief EIC Officer), which would have independent access to the Board of Regents, and the Office of the President. | Under Consideration. Work on interim solutions to achieve goals behind recommendation is in progress. Ongoing/In Progress. |
| 4.3 | Enhance the functionality of the current Ethics, Integrity, and Compliance Committee (EICC). | Ongoing/In Progress. |

Update as of May 10, 2022

*This summary reflects high-level categories of GPS' recommendations.

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|---|---|--|
| # | Guidepost Recommendation | University Status |
| 4.4 | Engage an expert third party to conduct an effectiveness review of Michigan Medicine's Compliance Program. | Recommendation Accepted. |
| 5.0 | Gender and Sexual-Based Misconduct Recommendations: | |
| 5.1 | Restructure Ann Arbor's OIE to create a new office that is more reflective of the responsibilities of the office; rebrand and create a fresh start for the office. Focus on engagement with the campus communities, lead with care and support and create a separation between investigators and those providing support. | Substantial work is in progress. This is a long-term process. Ongoing/In Progress. UM created a new office – Equity, Civil Rights and Title IX Office (ECRT). ECRT subsumed OIE at Ann Arbor. Some of the most significant aspects of ECRT for Ann Arbor include a new reporting line to the President, creation of a new department– Prevention, Education, Assistance and Resource (“PEAR”), adding a support coordinator and equity specialist, adding a Resolutions Officer, an expanded civil rights function, and a Deputy Title IX Coordinator for Michigan Medicine. Both Dearborn and Flint changed OIE to ECRT and engaged in some restructuring as well. Several new hires are in place. Additional new hires ongoing. |
| 5.2 | Update ECRT's website to ensure clear and user-friendly reporting options for IROs and the campus community and also delineate between the Title IX and Civil Rights function. | Website enhancements implemented. Ongoing/In Progress. |
| 5.3 | Consider recommended updates to the Interim Sexual and Gender-Based Misconduct Policy before it was finalized. | Many recommendations were accepted and incorporated into the final Policy. https://sexualmisconduct.umich.edu/policy/ |
| 5.4 | Implement more robust training for IROs and campus-wide training and prevention efforts. | Substantial work is in progress. Ongoing/In Progress. |
| 5.5 | Designate all full-time employees (except those that fall under the category of Confidential Resources) as IROs, with limited exceptions to this designation. | UM adopted a different definition for IROs than GPS recommended. |
| 5.6 | Prior recommendation from WH to evaluate OIE investigative practices – including ensuring OIE is identifying and as appropriate pursuing additional investigative avenues when complainants decline to participate in an investigation. | GPS' engagement did not expand to include a full review of UM investigative practices. GPS' recommendations re: ECRT that are now being implemented and GPS' recommendations to the Interim Policy that were adopted also address these concerns. |

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| # | Guidepost Recommendation | University Status |
| 6 | Cultural Journey: | |
| 6.1 | Make a commitment to co-create culture change by initiating a culture transformation journey that has defined deliverables including but not limited to, defining University's unifying, shared values and behaviors. | Substantial work is in progress. Long-term process. Ongoing/In Progress. |