

# CR DOE Directive Risk Assessment Taskforce

Date: March 25, 2025  
To: Dr. Keith Flamer  
From: Department of Education Mandate Assessment Taskforce  
Subject: Final Report and Recommended Next Steps

**Task Force Charge:** Evaluate the District’s risk vis-à-vis the Department of Education Dear Colleague Letter: Title VI of the Civil Rights Act in Light of Students for Fair Admission v. Harvard (2/14/2025), the Frequently Asked Questions on the Dear Colleague Letter about Racial Preferences and Stereotypes Under Title VI of the Civil Rights Act (3/1/2025), and the Additional Measures to Combat Anti-Semitism (Expansion of Executive Order 13899) (1/29/2025) and recommend actions to mitigate those risks.

**Overview of Task Force Work Plan:** The task force conducted a comprehensive review of the areas of risk highlighted in the Dear Colleague letter. Based on their assessment of these risks, the task force has made well-considered recommendations aimed at ensuring long-term sustainability while federal actions are under legal challenge. This report, which outlines the next steps, marks the conclusion of the task force's work.

## Summary of Task Force Findings:

- Of the District’s 394 Board Policies (BPs) and Administrative Procedures (APs), 24 Administrative Procedures and 21 Board Policies have potential risk based on the language contained in those APs and BPs.
- Webpages for student services, committees, and the District Mission, Vision, and Values reflect terminology at odds with current Executive Orders and the Dear Colleague Letter.
- District programs, events, activities, clubs, and sports are open to all and are therefore unlikely to be at odds with the current Executive Orders and the Dear Colleague Letter.
- With one exception, current Admissions and Financial Aid forms and practices align with the new federal directives.
- One scholarship includes ethnicity as a qualification, but the inclusion of this qualification is required by the funding source (it is a state-funded program). Race-based scholarships have been identified for targeting at other institutions. It’s unclear if the requirement of the funding source mitigates this risk.
- A multicultural graduation ceremony is held on campus and while it is open to all, similar separate graduation events have been targeted at other institutions, posing potential risk to the District.

### Risk Level Assessment

**Red** – Highest Risk of Exposure

**Yellow** – Modification Needed

**Green** – Currently Meeting Federal Standards of Inclusion

- Current College of the Redwoods Police Department practices align with the California Attorney General’s Guidance on Promoting a Safe and Secure Campus for All.
- Tension exists between the Dear Colleague Letter and federal laws and California state laws and regulations. This has resulted in several ongoing challenges via lawsuits.

**Task Force Recommendations:** Based on the current challenges to federal norms, and acknowledging that these challenges are evolving, the following recommendations are proposed:

**Recommendation #1:** Because legal challenges opposing the executive orders against DEI are pending, enact this set of recommendations strategically. In some cases, it may be judicious to plan for alterations but delay implementation until the current legal challenges are resolved. Pre-emptive compliance carries its own risk.

**Recommendation #2:** As needed, modify the APs, BPs, Planning Documents, and Communication materials with language that is acceptable under current federal directives while complying with federal law and California state standards. Ensure that the modifications maintain an unwavering commitment to student success, wellness, and belonging.

**Recommendation #3:** Affirm the District’s commitment to inclusive outreach activities while maintaining firm support for the wellbeing of all students.

**Recommendation #4:** Ensure communications are clear so the campus community is aware that clubs, activities, and sports are open to all.

**Recommendation #5:** Publish, promote, and train staff about recently approved policies related to potential law enforcement requests to access the campus and residential units for any purpose related to the immigration status of students or staff members.

**Recommendation #6:** Gender ideology in sports should adhere to the current legal requirements unless and until there are changes to state regulations. It is important to continue offering opportunities for all individuals to participate in athletics as outlined in the California Community College Association Bylaws.

**Recommendation #7:** Continue to comply with the vacatur of the 2024 Title IX federal regulation previously issued in April 2024. Continue to follow existing state and federal anti-discrimination laws.

**Recommendation #8:** Maintain the current scholarship criteria unless and until the demographic criterion for awarding private dollars shifts.

**Recommendation #9:** Emphasize and expand inclusive language for the Multicultural Graduation Celebration. Ensure the community knows the event is open to all.

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**Recommendation #10:** Ensure all student club documents reflect that participation is open to all students.

**Recommendation #11:** Provide “Know Your Rights” training for students, staff, and the wider community.

**Recommendation #12:** Continue to safeguard student records abiding by the Federal and California Education Code protections for confidentiality and Student Education.

**Recommendation #13:** Maintain employment processes and policies that support hiring based on meeting qualifications identified in the job descriptions.

**Recommendation #14:** Continue offering promotional opportunities that fall within federal, state, and bargaining unit requirements.

**Recommendation #15:** Request the Board of Trustees review Board resolutions to determine if any resolutions should be amended or rescinded.

**Recommendation #16:** Monitor federal directives on an ongoing basis, assessing alignment with state requirements, exploring potential impacts on campus operations, and making recommendations for action as needed.

Thank you for your consideration.

**List of the Task Force Members:**

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## **Overview of Task Force Work Plan**

The Task Force was established to assess and address the impact of recent federal changes on District policies, procedures and practices, particularly as they relate to diversity, equity, and inclusion (DEI). The objective was to conduct a thorough review of key areas of District operations to ensure compliance with new federal directives while maintaining compliance with federal and state law and reaffirming the District's core values and support of underrepresented communities. The following provides an overview of the Task Force's activities, action plan, and findings.

## **Task Force Activities & Action Plan**

The Task Force reviewed various areas of District policies, practices, and procedures to identify where DEI language and principles are embedded. The team worked collaboratively, meeting four times in hybrid format to discuss findings, gather input, and develop recommendations. A comprehensive review was conducted in the following areas:

### **Task Force Areas of Review**

- 1. Administrative Supports**
- 2. Admissions**
- 3. Compensation**
- 4. Conduct/Discipline**
- 5. Financial Aid**
- 6. Graduation Ceremonies**
- 7. Hiring**
- 8. Housing**
- 9. Immigration Issues**
- 10. Institutional Plans**
- 11. Prizes**
- 12. Promotions**
- 13. Scholarships**
- 14. Student Life and Cultural Clubs**

## **Key Questions Addressed**

For each area of review, the Task Force answered the following questions to evaluate alignment with federal and state laws, as well as to ensure that policies and practices serve the District's commitment to DEI:

- 1. Where do we have DEI identified in policy, practice, or procedure?**
- 2. What is the intention behind these DEI policies or practices?**
- 3. Is the language inclusive?**
- 4. Does the language, program, or practice serve a clear purpose?**
- 5. Can the messaging or practice be interpreted as discriminatory or exclusive?**

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## Risk Evaluation and Recommendations

Each area was evaluated and categorized based on the level of risk and recommendations were provided as appropriate to the assessed level of risk:

- **Red** – **Highest Risk of Exposure**: Areas where DEI practices or language may conflict with federal directives, requiring immediate attention and possible revision.
- **Yellow** – **Moderate Risk of Exposure**: Areas where modification may help ensure that the language and messages are inclusive, transparent, and in alignment with federal directives while maintaining the District’s core values and complying with federal and state laws.
- **Green** – **Lowest Risk of Exposure**: Areas that comply with federal directives and do not currently warrant action.

**Next Steps:** Informed by the Task Force’s recommendations, the District may choose to proceed with revising policies, procedures and practices in high-risk areas and ensure that the messaging in all practices remains clear, inviting to all students, and in alignment with federal directives. The District may also choose to request that ongoing reviews be conducted to ensure compliance with evolving federal directives. This report marks the conclusion of the Task Force’s work, but the Task Force recommends that the District’s ongoing commitment to inclusivity, equity, and the success of its diverse student body remain steadfast.

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# Executive Summary: Addressing the Impact of Executive Orders 14151 (J20 Order) and 14173 (J21 Order) on District Policies and Practices

## Overview

The recent Executive Orders 14151 (J20 Order) and 14173 (J21 Order), along with the Dear Colleague Letter from the U.S. Department of Education (February 14, 2025), have introduced significant changes to the federal interpretation of policies regarding Diversity, Equity, and Inclusion (DEI). These directives aim to align federal policies with merit-based systems and eliminate potentially preferential treatment based on identity factors, including race and gender. However, this policy reframing has sparked concerns in California due to conflicts with state and federal protections that are intended to support underrepresented students and staff.

Title VII of the Civil Rights Act (federal law) and Title V of the California Fair Employment and Housing Act (FEHA) (state law) provide protections against discrimination. This discrepancy has resulted in a misalignment between the federal directives and California’s commitment to diversity, equity, and inclusion. As a result, many of the current federal directives are being contested in court, and their implications are raising fears of reduced federal funding for higher education institutions that maintain DEI programs.

In this climate, educational institutions, including College of the Redwoods, are being forced to navigate the complexities of these federal directives while simultaneously complying with federal and state laws and safeguarding the core mission of supporting historically underrepresented communities.

## Objective: Navigating the Challenges while Upholding Commitment to DEI

Despite the federal directives, the Task Force urges the District to remain steadfast in its commitment to ensuring equitable opportunities for all students and staff. The unique needs of the community—particularly those arising from high Adverse Childhood Experience (ACE) scores, a need for belonging among underrepresented student populations, and a diverse workforce—continue to require focused attention. The Task Force believes the District has an ongoing obligation to meet these needs while also ensuring the long-term sustainability of the institution amid federal pressures. While the federal government’s actions have created significant uncertainty, the Task Force recommends that the District remain committed to ensuring that District practices, policies, and documents align with both California Education Code and the federal directives without compromising the District’s core values and commitment to meeting community needs.

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## **Risk Assessment and Anticipatory Compliance**

Conducting a risk assessment to understand the potential vulnerabilities from the federal government's current directives related to DEI is a critical step. However, compliance should not come at the expense of the District's commitment to inclusivity and equity. As part of this process, it is essential to carefully review District documents, policies, and practices to ensure that the institution is prepared for any potential legal or financial sanctions from the federal government.

As the District does this work, it is important to remember that preemptive compliance comes with its own risks. Philosophically, self-censorship may signal tacit agreement with the principles of those in power, inadvertently granting them permission to continue to act on those principles. Practically, preemptive compliance stifles innovation, increases fear, and causes confusion about core values. As a public institution, these consequences have a ripple effect throughout the entire community that the District serves.

## **Commitment to Meeting the Needs of Underrepresented Students and Staff**

Despite the challenges posed by the federal directives, the needs of students, particularly those from underrepresented backgrounds, remain at the forefront of the District's mission. One way the District can continue to uphold its values is to continue to offer robust support programs, such as:

- **Cultural Competency:** Continuing efforts to build an inclusive, equitable campus environment for all students, staff, and faculty.
- **Support Programs:** Fostering student support systems such as mentorship programs, affinity groups, and community building for underrepresented groups.
- **Workforce Diversity:** Ensuring that staffing and recruitment policies continue to reflect the diverse needs of the student body and community, while also maintaining compliance with federal mandates.

## **Taskforce Review and Vulnerability Identification**

A **Taskforce** was formed to conduct a thorough review of District policies and practices. The primary objectives of this taskforce were to:

1. **Identify Areas of Vulnerability:** Determine where the District might be at risk for federal scrutiny or financial repercussions due to its DEI initiatives or non-compliant language.
2. **Expand Opportunities:** Identify areas where the District can expand or enhance its commitment to inclusive opportunities for students and staff, even within the confines of federal guidelines.
3. **Maintain Existing Supports:** Ensure that the District continues to provide critical support for underrepresented students and staff, aligned with the current legal and regulatory frameworks.

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Key areas of review and assessment included:

- **DEI Language:** Where do current documents and practices include language that could be seen as non-compliant with the new federal directives? This needs to be identified and adjusted as necessary.
- **Programs and Support:** How is the District currently supporting underrepresented students and staff, and how can the District ensure that these supports remain in place under new federal directives?
- **Risk Areas:** Where is the District most vulnerable to federal scrutiny, especially concerning federal funding or enforcement of federal laws under the current interpretation of those laws? These areas should be closely monitored and protected.

### **Moving Forward with Confidence**

In the face of federal changes, the Task Force recommends that the District:

- **Monitor and Adapt:** Continually monitor the evolving legal and policy landscape and make timely adjustments to ensure compliance without sacrificing the District's commitment to its students.
- **Maintain Clear Communication:** Communicate clearly with faculty, staff, students, and the broader community about the District's ongoing efforts to balance compliance with the needs of a diverse student body.
- **Safeguard Student Success:** Keep the focus on student success, particularly for underrepresented groups, and ensure that the District's efforts to support these students are unwavering.

### **Conclusion**

The Task Force recommends that the District remain committed to its mission of serving underrepresented students and providing an inclusive, equitable environment for all. While the federal directives pose significant challenges, they do not change the District's fundamental obligation to its community. By conducting a thorough risk assessment, making thoughtful and sometimes nuanced adjustments to policies and practices, and ensuring open communication, the District may be able to navigate these changes while continuing to meet the unique needs of its students and staff. Ultimately, the Task Force recommends that the District's commitment to students remain firm and unwavering, while adapting to shifting circumstances, maintaining a focus on sustainability, equity, and the long-term success of our students and the institution.

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# Full Report of the CR DOE Directive Risk Assessment Taskforce

## Goals and Objectives of Risk Assessment

The District is, and has been, committed to supporting the dignity of and fair and equitable treatment of all students regardless of race and ethnicity, gender and gender identity, sexual orientation, socioeconomic status, language, culture, national origins, religious commitments, age, disability status, and political perspective. While work related to this cause has often been labeled “Diversity, Equity, Inclusion (DEI),” at its core, it is a student-centered commitment to educational opportunities for all that is captured in our Vision:

College of the Redwoods will create and sustain the conditions that will enable all students to experience an educational journey that is intellectually, socially, and personally transformative. We will inspire participatory citizenship grounded in critical thinking and an engaged student body.

In response to the “Dear Colleague” letter sent to educational institutions on February 14, 2025, the District has formed a task force to evaluate the lawfulness of its programs that attest holding to values of “DEI” to ensure they are not encouraging “Discrimination on the basis of race, color, or national origin” because that would be “...illegal and morally reprehensible.” Soon after the work of the Task Force began, the Department of Education issued the FAQ on Dear Colleague Letter about Racial Preferencing (3/1/25) and the Expanding of Executive Order 13899. These documents were incorporated into the work of the Task Force

What follows is a risk assessment regarding the potential concerns of the Department of Education about the District’s processes related to “admissions, hiring, promotion, compensation, financial aid, scholarships, prizes, administrative support, discipline, housing, graduation ceremonies, and all other aspects of student, academic, and campus life.”

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# Task Force Areas of Review



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# Administrative Supports

## Review of Board Policies and Administrative Procedures

### Findings

The District has 394 Board Policies and Administrative Procedures. A keyword search was run in BoardDocs using the terms on this [list](#) (and variations thereof). 24 Administrative Procedures and 21 Board Policies were identified as potentially putting the District at risk based on the language contained in those APs and BPs.

### Recommendations

Recommendations for each of the APs and BPs that were identified as a potential risk were included on a separate [spreadsheet](#).

Folders containing the identified [Board Policies](#) and [Administrative Procedures](#) with specific language that constitutes a potential risk highlighted along with comments with recommendations and supporting information were created for the convenience of the work of the Task Force and the Board of Trustees.

## Review of Student Supports

### Findings

The District offers support services and resources to students through a variety of programs. While many of these programs are open to all students, some are limited to eligible students, with eligibility requirements being dictated by the funding source.

#### Academic Support Center

<https://www.redwoods.edu/services/asc/index.php>

Open to all students.

#### Basic Needs Center

<https://www.redwoods.edu/services/bnc/index.php>

Open to all students.

#### CalWorks

<https://www.redwoods.edu/services/calworks/index.php>

Participation is limited to eligible students (students with children under the age of 18 who are receiving TANF). Eligibility criteria are based on terms of funding.

#### Career Center

<https://www.redwoods.edu/services/cc/index.php>

Open to all students.

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### **Counseling & Advising**

<https://www.redwoods.edu/services/counseling/index.php>

Open to all students.

### **EOPS/CARE/NextUp**

<https://www.redwoods.edu/services/eops/index.php>

Participation is limited to eligible students (income-disadvantaged, single parents, current and former foster youth). Eligibility criteria are based on terms of funding.

### **Foster Kinship Care**

<https://www.redwoods.edu/services/foster/index.php>

Open to all students.

### **Light Center**

<https://www.redwoods.edu/services/sass/light.php>

Participation is limited to students enrolled in specific courses. These courses are open to all students.

### **Learning Resource Center**

<https://www.redwoods.edu/academics/library/index.php>

Open to all students.

### **Multicultural and Equity Center**

<https://www.redwoods.edu/services/mec/index.php>

Open to all students.

### **Native American Student Support and Success Program**

Participation is limited to eligible students (Native American). Eligibility criteria are based on terms of funding.

### **Pride and Dreamer Center**

Open to all students.

### **Rising Scholars Program**

Participation is limited to eligible students (juvenile justice impacted students). Eligibility criteria are based on terms of funding.

### **SASS**

<https://www.redwoods.edu/services/sass/index.php>

Participation is limited to eligible students (students with a learning disability, medical and/or mental health diagnosis). Eligibility criteria are based on terms of funding.

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## TRiO

<https://www.redwoods.edu/services/trio/index.php>

Participation is limited to eligible students (first generation, income qualified, documented disability). Eligibility criteria are based on terms of funding.

## Veteran's Resource Center

<https://www.redwoods.edu/services/vrc.php>

Participation is limited to eligible students (active-duty military, veterans, and dependents of veterans). Eligibility criteria are based on terms of funding.

## Welcome Center

<https://www.redwoods.edu/services/counseling/virtual-welcome.php>

Open to all students.

## Recommendations:

- **Review webpages:** Review webpages for the Basic Needs Center and Multicultural and Equity Center and consider revising certain language to reduce potential risk.
- **Change names:** Consider renaming the Multicultural and Equity Center.
- **Clarify messaging:** Ensure that messaging for programs clearly states that the programs are available to all.

## Review of Committees

### Findings

35 committees and 14 CE advisory committees were identified and reviewed for potential risk. Documents were requested from each committee chair that reflect the mission, vision, purpose and goals of the committee, govern or guide the committee, or are created by the committee. The review included the current Committee Handbook (2022), the draft Committee Handbook (2025), the Committee Digests, agendas and minutes on BoardDocs, the website for each committee, and documents that were provided by the committee chairs.

### Recommendations

- **Review updated Committee Handbook:** The IEC is in the process of updating the Committee Handbook and plans to release a 2025 version. The pages for the Student Equity Committee and the Guided Pathways Committee should be reviewed and potentially revised prior to finalizing the draft 2025 Committee Handbook.
- **Review new committee websites; ensure that archived content remains unavailable to the public:** The webmaster is in the process of creating pages on the new website for each committee. The pages on the new website should avoid using terminology that could expose the District to risk. The archived committee pages should remain unavailable off campus while the transition to the new website is taking place.

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- **Revise selected committee documents (including Mission, Vision, Purpose, Goals, Governing and Guiding Documents and Deliverables):** Areas of potential risk were identified for 13 committees. Specific details on the level of risk and recommendations have been identified on a separate spreadsheet. Documents are still being gathered for some committees and the spreadsheet will be updated as those are received.
- **Develop and communicate standards for committee meeting agendas and minutes:** Provide clear directive for all Committee chairs/leads on advisable terminology or approaches moving forward in alignment with the updated Mission and Philosophy (and EMP if it is revised), to include the leads for all CE Advisory Committees. Ensure committee chairs/leads are aware of the need to minimize risk. Be careful not to impede the free speech rights of the committee chairs or members.
- **Provide guidelines for Committee Digest submissions:** Provide clear instructions for those submitting entries for the Committee Digest on what is advisable terminology or approaches moving forward in alignment with the updated Mission and Philosophy (and EMP if it is revised). Ensure committee chairs/leads are aware of the need to minimize risk. Be careful not to impede the free speech rights of the committee chairs or members. Consider housing the committee digest internally rather than making it public facing.

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# Admissions

## Review of APs, BPs, Forms, and Practices Related to Admissions & Records

### Findings

After a critical review of admissions policies and materials, five potential issues were identified.

#### **Admissions AP/BP 5010**

College of the Redwoods is an open-access campus, admitting all individuals over 18 or who have graduated high school. Students who are at least 15 years of age or who have had schooling equal to grade nine can attend as special part-time students. The intention of this is to ensure open admissions.

#### **Admissions Form: Student Information Update**

On this section of the form, students have the following options for “pronouns”: SHE (She/Her/Hers), HE (He/Him, His), ZE (Ze/Hir/Hirs), THEY (They/Them/Their), NAME (use my name as pronoun). The intention of this inclusive language is to allow students to update their personal information and specify their pronouns. Allowing use of pronouns other than he or she could potentially violate [the federal edict](#), which inaccurately claims that there are only two recognized genders, which are assigned at birth. Also on this form, students can choose between “Male, Female, or X” for their Legal Sex, allowing students to notify the college of a legal sex change. Recognizing a student’s legal sex may also potentially violate the federal directive.

#### **Admissions Outreach**

Admissions/application workshops are given on campus for EOPS, in the MEC, for athletics, or for any other department/group that requests one. Admissions/application workshops are given off campus at most local high schools for seniors. The intention of these outreach workshops is to engage/educate the community about CR admissions, and to cast a wide net in attracting new students.

#### **Records Release Policy**

Under federal law, students must provide written consent before we can disclose educational records, unless the information is relevant for a legitimate educational interest or includes directory information. Directory information is basic student information that may be shared with outside parties, unless a student opts out of the release of the information. Examples of directory information include the following: name, address, phone number, and date of birth. The intention of this policy is to abide by FERPA laws and directory information policies, neither of which provides an exception for permitting disclosing information for immigration enforcement purposes. The purpose of this policy is to provide employees with a framework so they know when and how they can legally disclose student information.

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## Recommendations

- **Continue to adhere to current policies** around admissions, outreach, and the release of records.
- **Review federal and state law regarding pronoun rights and gender assertion rights** for individuals who have undergone sex reassignment. Comply with federal and state laws.

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# Communications

## Review of Website

### Findings

The website was reviewed, and it was determined that most of the risk comes from the different programs and areas that make up the website (MEC, Library, etc.). Also, many planning documents, policies and procedures, and committee reports have risks associated with them and are searchable on the website; these are being reviewed by other members of the Task Force.

Access to archive.com and internal.com has been limited to on-campus and is not searchable from off campus. This should reduce the risk of historic documents and attachments being flagged.

### Recommendations

- **Provide guidelines for web content managers:** The various programs and areas that make up the website (MEC, Library, etc.) should follow these guidelines as they update content to mitigate the risk.

## Review of Social Media

### Findings

Social media is not a risk, except for past flyers for events and clubs that may include DEI language.

### Recommendations

- **Commit to inclusive language:** Going forward, all flyers should make it clear that the events or clubs, etc, are open to all.

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# Compensation

## Review of Compensation Policies and Practices

### Findings

In a review of current compensation analysis, the District’s pay structure for Faculty, Classified, and Administrators is not subject to variation based on DEI. The District adhere to federal and state guidelines and does not appear to conflict with the executive orders or the February 14, 2025, “Dear Colleague Letter.”

### Recommendations

- No changes are recommended.

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# Conduct/Discipline

## Review of Conduct/Discipline Policies and Practices

### Findings

On February 28, 2025, AP 5500 (Student Conduct Code and Disciplinary Procedures) was reviewed. It was determined that there was no language in reference to DEI. Revised language for AP 5500 is currently being drafted and the ASPC is in the process of separating out Academic Dishonesty into a separate AP. The Academic Senate is currently reviewing the language and will be suggesting new language for the AP in reference to academic dishonesty. Their intent is to send revised language to the College Council by the end of the spring semester.

### Recommendations

- As the language in AP 5500 ensures that all students are held to the same code of conduct and experience the same disciplinary processes, there are no recommendations for changes to the current AP
- Once the suggested changes to the policy (or policies if it is split into two) have been drafted, the drafts should be reviewed for risk before final approval.

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# Financial Aid

## Review of Financial Aid Policies and Processes

### Findings

Three things were examined for the purpose of determining risk. None were deemed to create a risk.

#### **Financial Aid BP 5130**

A program of financial aid to students will be provided, which may include, but is not limited to, scholarships, grants, loans, and work and employment programs. All financial aid programs will adhere to guidelines, procedures and standards issued by the funding agency, and will incorporate federal, state, and other applicable regulatory requirements. The purpose of this policy is to administer financial aid consistent with federal and state guidelines. This language is required if the District wishes to remain an eligible institution to administer Title IV aid.

#### **Financial Aid Outreach**

Financial Aid application workshops are given on campus for EOPS, in the MEC, for athletics, or for any other department/group that requests one. Financial Aid application workshops are given off campus at most local high schools for seniors. They provide support and in-person help for students going through the financial aid application process, as it can be overwhelming and cumbersome. Workshops are open to all students.

#### **Records Release Policy**

Students must provide written consent before the District can disclose educational records, unless the information is relevant for a legitimate educational interest or includes directory information. Directory information is basic student information that may be shared with outside parties, unless a student opts out of the release of the information. Examples of directory information include the following: name, address, phone number, and date of birth.

### Recommendations

- No changes are recommended at this time.

Risk Level Assessment	
Red	– Highest Risk of Exposure
Yellow	– Modification Needed
Green	– Currently Meeting Federal Standards of Inclusion

# Graduation Ceremonies

## Review of Multicultural Graduation Celebration

### Findings

Multicultural Graduation celebrations are usually held for the Asian/Pacific Islander, Black/African American, Latinx, Native American, Undocumented, First-Generation, Veterans, Queer, and other underrepresented communities, but anyone can participate. Students from Eureka, Del Norte, and Klamath Trinity campuses are invited to participate.

### Recommendations

Recommendations include revising the registration form language and event communications to emphasize that the event is open to all.

#### *Current Text*

“Multicultural Graduation celebrations are usually held for the Asian/Pacific Islander, Black/African American, Latinx, Native American, Undocumented, First-Generation, Veterans, Queer, and other underrepresented communities, but anyone can participate. Students from Eureka, Del Norte, and Klamath Trinity campuses are invited to participate.”

#### *Suggested Text*

“The Multicultural Graduation Celebration is open to all students interested in a more intimate honoring of your graduation. Students from Eureka, Del Norte, and Klamath Trinity campuses are invited to participate.”

**Note:** “Multicultural” can be removed if recommended.

Risk Level Assessment	
Red	– Highest Risk of Exposure
Yellow	– Modification Needed
Green	– Currently Meeting Federal Standards of Inclusion

# Hiring

## Review of Hiring and Onboarding Policies and Procedures

### Findings

The Task Force has conducted a thorough review of the District’s hiring policies and procedures to ensure fair, consistent, and legally compliant recruitment and selection processes. These policies align with federal and state laws while supporting the District’s mission to provide high-quality education and services to students and the community. Screening Committee members receive detailed training on these procedures, confidentiality requirements, time commitments, conflict of interest policies, and Equal Employment Opportunity (EEO) regulations. The hiring process includes standardized applicant review methods, structured interviews, and required reference checks, with final hiring decisions approved by the Superintendent/President.

For job opportunity advertising, the District emphasizes Equal Employment Opportunity (EEO) based on merit, skills, and experience. Job postings use neutral and inclusive language while avoiding terminology that suggests demographic-based hiring preferences. Additionally, recruitment materials highlight the District’s commitment to fostering an inclusive and supportive work environment for all employees.

As part of the District’s commitment to fostering a welcoming and inclusive environment, the District is in the process of developing affinity groups to enhance community support and inclusion among students, staff, and faculty. To ensure these groups reflect the needs and interests of the CR community, individuals are encouraged to complete a survey and share their thoughts. Additionally, the District continues to invest in professional development through its Professional Development Committee (PDC) and Workforce and Community Education programs offering a range of training, workshops, and resources tailored to faculty, staff, and students.

Furthermore, new employees undergo a structured onboarding process that includes orientation sessions covering essential campus resources, HR policies, and compliance training through Keenan Safe Schools. These training courses cover topics such as implicit bias awareness, cybersecurity, FERPA, and workplace safety. The District remains dedicated to continuous improvement and the advancement of its faculty and staff, ensuring that hiring practices, professional development, and retention efforts align with institutional goals and legal standards.

### Recommendations

- The District should regularly review its hiring and retention initiatives to ensure that they align with federal directives while maintaining a commitment to an inclusive and equitable workplace.

Risk Level Assessment	
Red	– Highest Risk of Exposure
Yellow	– Modification Needed
Green	– Currently Meeting Federal Standards of Inclusion

- Outreach efforts should continue to focus on expanding applicant pools by targeting socio-economically disadvantaged communities, veterans, individuals with disabilities, and first-generation professionals, rather than using race- or gender-based preferences.
- No recommendations for change at this time.

## Review of Screening Committee Procedures

### Findings

Screening Committee members are shown a PowerPoint presentation outlining the procedures and expectations for members of a Screening Committee in the hiring process.

### Recommendations

- No changes recommended at this time.

## Review of Equal Employment Opportunity (EEO) Monitors

### Findings

The role of the Equal Employment Opportunity (EEO) monitor of the interview and screening committee involves ensuring that the interview process is fair, non-discriminatory, and compliant with equal employment opportunity regulations. Specifically, the EEO monitor is responsible for overseeing that all candidates are treated equitably, and that the committee adheres to consistent, non-biased practices when asking questions and evaluating candidates. The EEO monitor also ensures that the process is free from any discriminatory actions or behaviors. The EEO monitor's duties include observing the committee's interactions, ensuring that the interview process complies with legal and institutional standards, and documenting any concerns or irregularities related to the fairness of the interview process. Additionally, the EEO Monitor may assist in confirming that reference checks and candidate assessments are conducted in a manner consistent with EEO guidelines.

Employees will also be briefed on Keenan Safe Schools Training, which may include courses on the following depending on the new hire's job classification and description:

- I. Discrimination Awareness in the Workplace
  - a. AP 3420 Equal Employment Opportunity; ACCJC Standard III.A.12; Education Code Sections 87100 et seq.; Title 5 Sections 53000 et seq. and Sections 59300 et seq.; Government Code Sections 7400 et seq. and 12940 et seq.
- II. Implicit Bias and Microaggression Awareness
  - a. AP 3420 Equal Employment Opportunity; ACCJC Standard III.A.12; Education Code Sections 87100 et seq.; Title 5 Sections 53000 et seq. and Sections 59300 et seq.; Government Code Sections 7400 et seq. and 12940 et seq.

Risk Level Assessment	
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## Recommendations

- Due to conflicts between California and Federal policies, maintain current process until further guidance is received.

# Housing

## Review of Housing Policies and Practices

### Findings

Three housing documents were evaluated: the [2024-25 Housing Application](#), Step 2 Acceptance Paperwork, and [Community Guidelines](#). A detailed analysis can be found in the Housing tab of the [Risk summary- Draft](#) document. The District does not currently assign housing based on affinity groups.

#### **2024-25 Housing Application**

Inclusive language is used throughout this application.

#### **Step 2 Acceptance paperwork**

Overriding inclusive general "student" language throughout.

#### **Community Guidelines**

In addition to inclusive language, there is a paragraph on page four about Community Respect summarizing the District's Residence Hall policy and view on racism, bigotry, discrimination, and all forms of harassment as no such behavior will be tolerated. Another paragraph on page 10 summarizes the District's Residence Hall policy and view on not tolerating a climate of fear or intimidation in the Residence Hall Community. As such, any type of written or verbal abuse will not be tolerated.

## Recommendations

- Continued usage of inclusive language in all application materials, communications, and guidelines is recommended.

#### Risk Level Assessment

**Red** – Highest Risk of Exposure

**Yellow** – Modification Needed

**Green** – Currently Meeting Federal Standards of Inclusion

# Immigration Issues

## Review of Immigration-related Policies and Practices

### Findings

The District’s ability to respond to immigration enforcement activities was assessed in the following areas: gathering and handling student information, responding to law enforcement requests for access to campus and residential units, and requesting to access student records. The Assessment tool utilized is from the California Attorney General Rob Bonta entitled, “[Promoting a Safe and Secure Campus for All: Guidance and Model Policies to Assist California's Colleges and Universities in Responding to Immigration Issues.](#)”

### Subpoena Response

A college campus may have areas that are open to the public, areas that have restricted access, and areas, such as residences, that cannot be accessed by law enforcement, including immigration enforcement, absent valid consent or a duly issued judicial warrant.

Additionally, as required by AB 21, each CSU, community college, and qualifying independent institution shall advise all students, faculty, and staff having contact with officers engaged in immigration enforcement who are executing any federal immigration order, to refer the officers to the office of the chancellor or president or that office’s designee for purposes of verifying the legality of these listed documents.

College of the Redwoods Police Department conducted a review of the following practices based on the “Promoting a Safe and Secure Campus for All” guidance document from California Attorney General Rob Bonta.

Important areas to note:

- ICE officials do not have an automatic right to access school records or non-public spaces within a school building.
- The college must review documentation presented by the agents to determine whether or not they have a right to non-public spaces.
- If ICE officials lack a court order or subpoena, disclosure of records without prior consent is prohibited based on FERPA.

The current CRPD Policy Manual, specifically Policy 411, outlines procedures for addressing Immigration violations. Assessment of our procedures for gathering and handling student information can be found in the Records Release sections of this report under “Admissions” and “Financial Aid.” Policy 411 has not yet been formally published.

Risk Level Assessment	
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## Recommendations

- Publish Policy 411: To ensure all members of the campus community are safe and understand how to correctly deal with potential immigration issues, Policy 411 in the CRPD Policy Manual should be immediately published and shared.
- Provide training about campus safety for the campus community, including “Know your Rights” training for all. This is a time of great uncertainty and fear. Students, faculty, and staff should be empowered with training to ensure they are able to bravely and confidently manage potential immigration conflicts to best protect our students and colleagues.
- Develop materials for students. Not all students will be able to attend training, so it is crucial to develop handouts and other materials to help students understand their rights.
- Designate an Immigration Point Person in consultation with Chief of Police

### Risk Level Assessment

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**Yellow** – Modification Needed

**Green** – Currently Meeting Federal Standards of Inclusion

# Institutional Plans

## Review of Institutional Plans

### Findings

The Task Force conducted a review of institutional plans. While the District's Mission is tended by the Board of the Trustees, **the following plans are at high-risk:**

- Education Master Plan
- Facilities Master Plan
- Student Equity Plan (is to be submitted to Chancellor's Office in Fall 2025)
- Distance Education Plan

Other plans are obsolete or outdated, such as the Guided Pathways Plan (GP) and past Annual Plans, which appear on the [planning website](#). The GP plan is old, and no new version is expected to be submitted in the future. Annual Plans are no longer valid and not being used by the District.

### Recommendations

- Revise wording and produce new versions of the following:
  - Education Master Plan
  - Facilities Master Plan
  - Student Equity Plan
  - Distance Education Plan
- Remove the following plans from the planning website:
  - Guided Pathways
  - All Annual Plans
- Moving forward, the Institutional Effectiveness Committee should continue to be responsible for reviewing plans.
- Ensure that members of the Institutional Effectiveness Committee receive training and communication about which plans are appropriate for public access, and which are not.

#### Risk Level Assessment

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# Prizes

## Review of Prizes and Prize-related Processes

### Findings

While there is a lack of clarity on how to define the word “prize,” the District offers three forms of District recognition that were evaluated for this report. DEI is not a criterion in the awarding of these forms of recognition.

- Years of Service with the District
- Classified Employee of the Year
- Kathryn G. Smith Leadership Award

The CR Foundation supports “prizes” throughout the District. These are normally Amazon gift cards and are utilized by ASCR, clubs, and departments to provide incentives to participate in events or surveys. No award criteria are utilized – these awards are determined by random draws.

The only District recognition that is influenced by DEI is the Annual Multicultural and Diversity Award. This is, however, awarded to an individual supporting DEI efforts and NOT to a person of a specific race.

The text of the 2024 award follows and should likely be modified.

The Annual Multicultural and Diversity Award nominations are *now open!* The Multicultural and Diversity Committee (MDC) of the Academic Senate and the Student Equity Plan Committee invite you to show gratitude to a colleague/project team by celebrating their efforts through a nomination for the 2024 Multicultural and Diversity Award. In the spirit of inclusivity, all employees of the college are eligible for nomination. This prestigious award recognizes an individual or group that has made outstanding contributions to promoting intercultural harmony, equity, and campus diversity at the College of the Redwoods. There are many ways an individual/team can demonstrate their commitments to diversity, equity, inclusion, accessibility, and anti-racism (DEIAA), so please take a moment to reflect upon colleagues who actualize their commitments in ways that positively impact the college community and our students. The deadline for submitting a nomination is **March 14, 2025**. Criteria and instructions are included in [this digital form](#). This award will be granted by the Academic Senate in collaboration with the Student Equity Committee and aligns with the goal of the Educational Master Plan to increase the district's commitment to diversity, equity, and inclusion (Initiative #6).

The honoree will be announced/awarded at Convocation and subsequently provided with the opportunity to select a piece of student art that resonates with the work/project for which they were nominated. This art will then be added to a permanent art installation

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centered around DEIAA efforts here at CR (*which members of the MDC, in collaboration with various departments across the district, are in the process of creating*).

#### Nomination Form Text

**College of the Redwoods is committed to** efforts centered around inclusion, diversity, equity, accessibility, and anti-racism (IDEAA) across the District (EMP #6). These pursuits encompass a wide range of differences, including but not limited to race and ethnicity. They also include variations in gender, age, religion, socioeconomic status, sexual orientation, abilities, perspectives, as well as the experiences of formerly incarcerated or system-impacted individuals. Embracing all forms of diversity enriches our communities and fosters a more inclusive and innovative environment. As such, College of the Redwoods' staff, faculty, and administrators are strongly encouraged to exhibit continuous attention and provide the necessary support to fully engage and inspire these students.

This prestigious award recognizes an individual or group that has made outstanding contributions to promoting IDEAA efforts at the College of the Redwoods. This award will be granted by the Academic Senate in collaboration with the Multicultural & Diversity Committee at the 2025 Convocation gathering. Following the announcement of this award, the awardee(s) name(s) will be added to the Infinite in Our Diversity art installation in the LRC, along with this year's winning student artist (whose piece will be awarded/purchased at this year's Juried Student Art Exhibition hosted by CR's Art Department.

There is also a Juried Student Art Exhibition award that is focused on DEI. This award is paid by the CR Foundation, as an independent 501(c)3. This is, however, awarded to an individual supporting DEI effort and NOT to a person of a specific race. The award is a \$300 gift.

#### **Recommendation**

- Awards and prizes for staff & students are open to all. However, the titles may be problematic as they contain words that have been targeted by the federal government. The Task Force therefore recommend changing the titles when challenges to the Executive Orders produce clear guidance.

Risk Level Assessment	
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# Promotions

## Review of Promotion Policies and Procedures

### Findings

The Task Force reviewed policies and procedures pertaining to promotions and found no risk as identified in the February 14, 2025, “Dear Colleague Letter”. The District’s current promotional practices include reclassification, transfer, interim roles, and merit-based advancement.

The District follows a structured promotion process to ensure merit-based advancement, incorporating regular performance evaluations during probationary periods and biennially for permanent employees. For classified employees represented by the California School Employees Association (CSEA), promotions include salary step advancements, typically resulting in a 4-5% pay increase. Temporary assignments to higher duties also qualify for additional compensation. The policies further uphold principles of equal opportunity, prevent conflicts of interest such as nepotism, and reinforce a workplace free from bias and discrimination.

As a public community college in California, the District adheres to established promotion policies that comply with state regulations, collective bargaining agreements, and institutional guidelines. These policies are designed to maintain fairness, transparency, and compliance with legal frameworks governing public employment in higher education.

### Recommendations

- The policies in place are sufficiently inclusive and ensure that employees are provided with a clear pathway for advancement based on merit and performance while safeguarding against discrimination and conflicts of interest. No changes are recommended at this time.

Risk Level Assessment	
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# Scholarships

## Review of Scholarships and Scholarship Award Processes and Procedures

### Findings

The CR Foundation is an independent 501(c)(3) organization governed by an independent board of directors. While Foundation employees operate separately, a portion of their wages and salaries are funded by the District.

The CR Foundation offers five scholarships where race is considered as a factor and ten additional scholarships that take other demographic criteria into account. Scholarships that include race as a factor are framed as “preference given to” rather than being exclusively designated for a specific racial group. All scholarships are funded entirely by private donations.

As of now, the 2023 Supreme Court decision overturning affirmative action has not been used in legal challenges against the consideration of race in scholarship criteria. Additionally, there is no direct language on the Scholarships or Foundation webpages that explicitly reflects Diversity, Equity, and Inclusion (DEI) principles.

Listing of CR Foundation scholarships where race or demographic data is considered:

- Finish Line Scholarship
  - Black or African American
  - Two or More Races
  - 17 or younger during first for-credit year
  - Disabled
  - Received the California College Promise Grant, but not the Pell grant during first for-credit year
  - Foster youth or former foster youth
  - First Generation
  - LGBTQ+
  - Formerly Incarcerated
- Duane Allen Jr. Memorial- Preference given to Native American.
- Charles M. Foster Memorial – Preference given to Hispanic, African American, and Native American students.
- Jackie Memorial – Preference given to Native American students.
- Redwood Sports Car Club – Preference given to Hoopa H.S. graduates and members of the Hoopa Tribe or other Native American affiliation.

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- Colin Bibler – Requires an essay on what hardships a student has experienced due to mental health related issues or condition.
- Peggy June Boedecker (Funds come from Humboldt Area Foundation but the Foundation sends them a list of the top 3 students) – recipient must be a woman.
- Jim Davis Redwoods Scholarship Fund – Available to a student with a learning disability. Must be registered SASS.
- Del Norte Single Parent Vocational Nursing Scholarship – Available to single parents.
- John Richard Matney Memorial – Registered SASS with physical disability.
- McLaren Memorial – Essay on what hardships experienced due to mental health related issues or condition.
- Gay Melody Music-Scott Memorial – Must be a single parent.
- Tom and Dorothea Pendergast Memorial – Registered SASS, preference given to students with dyslexia.
- Gene and Dottie Portugal – Must be a female head of household.
- Marlen Smith Memorial – Preference given to foreign born and/or multilingual student. Preference given to widowed and single parents.

## Recommendations

- No changes recommended unless and until the courts rule race or demographic criteria cannot be considered for the awarding of private dollars by an independent 501(c)3.

### Risk Level Assessment

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**Yellow** – Modification Needed

**Green** – Currently Meeting Federal Standards of Inclusion

# Student Life

## Review of Cultural Clubs and Membership

### Findings

Cultural clubs on campus are open to all students, regardless of their background or ethnicity. The clubs aim to engage in cultural exchange and deepen their understanding of different traditions and practices. Membership is open to any student who is willing to comply with the bylaws set by the Associated Students of College of the Redwoods (ASCR).

Students are welcome to join and participate in the activities, events, and initiatives that each cultural club organizes. This open-door policy helps foster an environment where all students can learn from one another, share experiences, and build meaningful connections.

### Recommendations

- Ensure that all cultural club constitutions communicate that the club is explicitly open to all student members.
- Review websites to ensure the information is consistent with these recommendations.
- Include the following language in all club constitutions to ensure that they are consistent:

“The [Club Name] does not discriminate against anyone and is open to all who would like to join and follow the ASCR guidelines. Students shall have no less than a 2.0 grade point average for the semester prior to membership being granted and must maintain a 2.0 grade point average each semester remaining in said club. Each organization must have a minimum of five (5) members in good standing to be an official campus organization and members of all campus organizations sponsored by the Associated Students. Club members shall maintain enrollment in one (1) unit or more.”

## Review of The System Impacted Student Union

### Findings

This is a club for all students who are in some way impacted by incarceration. There is some concern that the word “system” might trigger a closer look at the group. Like all the campus clubs and student unions, it is also open to all interested students.

### Recommendations

- Make sure all public documents related to this group reflect that they are open to all students.

Risk Level Assessment	
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## Final Review

During the task force meetings, members discussed unintended consequences of the proposed recommendations outlined in this report. These include the impact to students, staff, faculty, and the community at large from modifications to naming conventions, program offerings, and concentrated efforts to proactively address the shifting federal educational landscape while honoring the collective efforts mandated in the state of California to address systemic disparities. As an institution there have been concerted efforts to meet the belonging and connection needs of students through the development of academic and program services. Modifications to the federal mandates while prudent in light of the fickle federal climate may have unintended consequences for the District.

Students who are unfamiliar with academic environments and processes, including many minority students and at-risk students, come to the District already feeling like they don't belong. Programs and spaces that name them specifically alert them to the fact that they are welcome and that they do belong, even if they do not actually choose to participate in those programs or inhabit those spaces. When naming conventions and language are changed so that these students do not see themselves specifically represented in the academic environment, the District is rescinding that invitation and risks compounding their sense of exclusion.

In addition, generalized language makes it harder for students to understand the purpose of the initiatives and how those initiatives might support them personally. This is especially true at a community college where very busy, mostly-part-time students simply don't have the time and energy to try to figure out what metaphorical, abstract, or generalized language really means.

If the District changes the language it uses to describe important programs and services that have long been part of the District's mission, vision, and planning processes prior to a clear and binding federal directive, the District sends a message to students, faculty, staff, and administrators that the District didn't actually mean what the District said. This will have profound impacts on all groups in the community, especially those who dedicated themselves, often at personal and professional cost, to student-centered Equity Work.

The District is in a delicate balance between the swiftly changing federal compliance landscape and the requirements for California. In California, the California Community Colleges (CCC) system has implemented regulations regarding Diversity, Equity, and Inclusion (DEI) in evaluation and tenure review processes, specifically found in Title 5 of the California Code of Regulations (CCR) sections 53601, 53602, and 53605.

By leaping into compliance with the Department of Education's ban on the use of certain words in alignment with federal directives, the District shifts out of compliance with California Code requirements. Currently, the Dear Colleague Letter and several Executive Orders are being legally challenged.

### Risk Level Assessment

**Red** – Highest Risk of Exposure

**Yellow** – Modification Needed

**Green** – Currently Meeting Federal Standards of Inclusion

The Taskforce discussed the need for the District to have an immediate awareness of all of the areas of risk. The color-coded assessment and expansive review are designed to maximize the ability of the District to rapidly pivot.

Risk Level Assessment

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## Ongoing Assessment Needs

Appoint the existing (or a new combination of) task force members to a new task force with the following charge: Assessing the campus risk for Anti-Semitic practices based on the criteria identified in the expansion of Executive Order 13899.

**New Charge for Task Force:** Ongoing monitoring of Federal directives and the impact on state requirements.

Risk Level Assessment

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**Green** – Currently Meeting Federal Standards of Inclusion

# Antisemitism Enforcement

## Background

On January 30, 2025, the Whitehouse released Additional Measures to Combat Anti-Semitism which expanded Executive Order 13899, “Combating Anti-Semitism,” that was signed in December 2019. The 2019 EO tasks federal departments and agencies charged with enforcing Title VI of the Civil Rights Act to use the law to investigate potential cases of discrimination against Jewish individuals where such action does not run contrary to rights protected under other federal laws. The expanded EO directs certain federal agencies to use appropriate legal tools to “prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.”

## Community Conversation

This event brought together Cal Poly Humboldt and College of the Redwoods teachers and students, local faith leaders, and Humboldt County Community members to discuss the Palestinian-Israeli conflict as viewed through multiple lenses. The community conversation encouraged intergenerational dialogue and foster compassionate discourse to increase understanding of international events and local impacts.

## Recommendations

- Continue to Promote Civil Discourse on Israel-Hamas War and Israeli-Palestinian Conflict
- Offer Robust Incident Reporting Mechanisms

### Risk Level Assessment

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# Addendum

After reviewing all the reports, the District may want to consider developing definitions for the targeted words, diversity, equity, and inclusion. [University of Michigan](#) has such definitions (pasted below). It is a slippery slope to try and remove words from District documents (because dictatorial regimes will simply start targeting new words). Instead, the District should consider explaining why these words do not mean what the federal administration thinks they mean. There is nothing “bad” in these definitions.

**Diversity:** Diversity broadly represents the variety of identities, perspectives, and experiences that individuals collectively bring to an environment. Beyond representation, diversity implies an appreciation, respect, and acknowledgment of the unique attributes that each individual brings to our institution. Many decades of research demonstrate how bringing together a community with a diversity of experiences and perspectives enhances innovation, creativity and more effective problem-solving.

**Equity:** Equity is a principle that centers on creating systems, organizations, and societies that are fair and just. It involves first recognizing when disadvantages and barriers exist and then allocating resources and support to ensure equal access and opportunities for all. The pursuit of equity disrupts historical patterns of inequality and exclusion, dismantles barriers to advancement, and ends any systematic bias and discrimination against people based on their identity and background. The ultimate goal of equity is to maintain an organization where everyone has the chance to achieve their full potential and thrive.

**Inclusion:** Inclusion involves active, intentional, and ongoing efforts to create environments where all individuals are welcomed, feel a sense of belonging, and are respected, supported, and valued to fully participate. Inclusion means accommodating different needs and perspectives. An inclusive culture embraces and celebrates differences, promotes open and respectful dialogue, and empowers individuals to bring their authentic selves to the table without fear of discrimination or marginalization.

Similar to the way in which the Education Master Plan establishes and empowers good work all across the District, defining DEIA could help empower and protect important work that supports student success.

Risk Level Assessment	
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