

SPARC Updated Guidance and Compliance Process

**OFFICE OF RISK, AUDIT AND COMPLIANCE
(RAC)**

ACKNOWLEDGEMENT

In effort to build upon CUNY's goal to leverage SPARC to prevent sexual violence, a few acknowledgements must be made. First, this work would not have been possible without the support and leadership of Chancellor Félix V. Matos Rodríguez, Executive Vice Chancellor and University Provost José Luis Cruz along with the executive team. In addition, several individuals contributed to the preparation of this report. We needed an incredible team committed to excellence, and efficiency. We want to thank the following individuals for their expertise, dedication and hard work for putting the SPARC updated guidance and compliance process report together.

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EXECUTIVE SUMMARY

The SPARC Task Force, established in the fall of 2019, made up of key executive staff within CUNY's Universities and headed by The Office of Risk Audit and Compliance (RAC), has in just 9 months' time, significantly tackled the various SPARC issues that have plagued the CUNY community for years. The task force developed an updated University SPARC process, a new and improved tracking matrix, unified accountability and a guidance for staff and students, to provide clear direction regarding compliance with the SPARC training.

- **Compliance** will be measured at **two points** in the semester as opposed to all year long.
- **College leadership and their respective administrative units will be responsible** for ensuring SPARC compliance by the end of the academic semester when student enrollment is finalized.
- Successfully made changes to the SPARC training course and for the first time it will be accessible and **user-friendly on all mobile and electronic devices** as well as increased browser accessibility for those both on campus and distant learning.
- Updated the SPARC presentation by ensuring that information contained in the training is updated as to CUNY personnel and resources available on campus.
- **Improved accuracy and timing of the data flow** between blackboard and CUNYfirst to allow student SPARC enroll in half the time.
- Created a SPARC timeline chart that will illustrate the flow of the compliance process and measurement.
- Established the **first ever definitive student-wide universal accountability** for failure to complete SPARC: If after a student has had three academic semesters to comply with the training requirement and has not completed SPARC, by his/her third semester the student would be prohibited from registering for classes until the training is completed.

INTRODUCTION

In fall 2018, the City University of New York (CUNY) implemented the Sexual and Interpersonal Violence Prevention and Response Course (SPARC) to provide students with education and training about sexual misconduct, including domestic violence, dating violence, stalking, sexual harassment, gender-based harassment and sexual violence. This online training was instituted to assist the University in complying with New York State Education Law Article 129-b, also called the Enough is Enough (EIE) statute, that requires all New York State colleges and universities to provide sexual and interpersonal violence prevention and response education and training to new students, as well as special and high-risk student populations enrolled at their campuses.

This memo serves to provide campus personnel with clear guidance regarding compliance with SPARC training. For CUNY to comply with Article 129-b, we will need you, the college's Chief Student Affairs Officer (CSAO), enrollment management team, and Title IX Coordinators and designees to prioritize student completion of SPARC training. It is essential that students complete the online training as it has valuable information that will help them to be safe, informed of their rights, and knowledgeable about where to go should they need help in dealing with sexual and interpersonal violence.

WHO IS REQUIRED TO COMPLETE SPARC?

All new and transfer **students**, and students assigned as **designated populations** must complete SPARC. A new student is required to complete SPARC once during their enrollment at CUNY, regardless of the campus or program in which the student was enrolled at the time of SPARC completion. SPARC training must be provided to new and transfer students during onboarding or new student orientation.

A **student** is defined as a person who is matriculated and enrolled in courses creditable toward a degree or a certificate approved and registered with the New York State Education Department. This definition applies to undergraduate and graduate students and includes degree and certificate programs that are offered in an on-campus, hybrid, and online format

Designated populations are listed in New York State Education Law Article 129-b as heads/officers of student organizations, student athletes, and students studying abroad or partaking in domestic overnight travel. These populations are unique to each CUNY campus and defined based on their activities and offerings and are required to take SPARC in addition to new and transfer students.

Annual Completion Requirements

Students who have been assigned as designated population **must** complete SPARC annually before they take part in a college recognized or sponsored activity. For example, student athletes **must** complete SPARC annually before participating in inter-collegiate activities.

Please note that new and transfer students are enrolled in SPARC through the University Operations. The designated populations are enrolled by each campus.

COMMUNICATING SPARC TO YOUR STUDENTS

Upon student's acceptance of a college admission offer, new students will receive instructions to complete the SPARC training module in Blackboard. All new students are expected to complete SPARC training prior to starting classes whenever possible but must complete their training in the first semester of attendance. SPARC compliance is optimal when communications about the training requirement are included in the college's new student communication plan. As such, Presidents are asked to ensure collaboration and cooperation between the CSAO, Enrollment Management, and the units that are most involved with the admission and onboarding of new first-year students and transfer students.

Fall admits: Beginning in late January, SPARC will be available in Blackboard for students who have been admitted for the upcoming fall semester. As new student enrollment begins, your college should begin to communicate about the SPARC training requirement. At the start of the fall semester, your college's CSAO and/or their designee should continue to monitor SPARC completion rates in CUNY Smart. (See Table 3)

Spring admits: Beginning in late October, SPARC will be available in Blackboard for students who have been admitted for the upcoming spring semester. As new student enrollment begins, your college should begin to communicate about the SPARC training requirement. At the start of the spring semester, your college's CSAO and/or their designee should continue to monitor SPARC completion rates in CUNY Smart. (See Table 4).

COMPLIANCE MEASUREMENT PROCESS AND MEASURES (see chart 1)

College leadership and their respective administrative units will be responsible for ensuring SPARC compliance by the end of the academic semester. Administrators with access can run SPARC compliance report to review student SPARC training status. Compliance will be measured at two points in the semester: (1) three weeks after the semester begins, and (2) at the end of the semester. At each of these points, RAC will contact you to share your college's SPARC compliance rate (for reference, see chart 1) that indicates University- wide SPARC compliance by college. For each semester, the compliance measure will occur as follows:

Fall semester: (1) mid-September and (2) late December.

Spring semester: (1) late February and (2) late May.

SPARC Timeline (for reference, see chart 2, chart 3, chart 4 and chart 5)

February	<ul style="list-style-type: none"> The University Title IX Director notifies the CSAOs and/or designee that SPARC training is available in Blackboard for Fall admits, and CSAOs and/or designee should begin to monitor compliance rates in CUNYfirst.
March	<ul style="list-style-type: none"> RAC sends the <u>first compliance report</u> for new Spring students to the President, CSAO, and Campus Title IX Coordinator following the Spring semester Census date. CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst record of the prior Fall's new students who did not complete SPARC. <ul style="list-style-type: none"> <i>This NSI will prevent registration in the Summer/Fall terms.</i>
April	<ul style="list-style-type: none"> CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst records of new Spring students who have not completed SPARC. <ul style="list-style-type: none"> This NSI will not prevent registration in the Summer/Fall terms. <i>Campuses begin to notify new Fall students of the requirement to complete SPARC.</i>
May	<ul style="list-style-type: none"> RAC sends the <u>final compliance report</u> for new Spring students to the President, CSAO, and Campus Title IX Coordinator at the end of the Spring semester.
September	<ul style="list-style-type: none"> RAC sends the <u>first compliance report</u> for new Fall students to President, CSAO, and Campus Title IX Coordinator following the Fall semester Census date. CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst records of the prior Spring's new students who did not complete SPARC. <ul style="list-style-type: none"> <i>This NSI will prevent registration in the Winter/Spring terms.</i>
November	<ul style="list-style-type: none"> CSAO and/or Designee will place a Negative Service Indicator (NSI) on the CUNYfirst records of the new Fall students who have not completed SPARC. <ul style="list-style-type: none"> This NSI will not prevent registration in the Winter/Spring terms. <i>The University Title IX Director notifies the CSAOs that SPARC training is available in Blackboard for Spring admits, and they should begin to monitor compliance rates in CUNYfirst.</i> <i>Campuses begin to notify new Spring students of the requirement to complete SPARC.</i>
December	<ul style="list-style-type: none"> RAC sends the <u>final compliance report</u> for new Fall students to the President, CSAO, and Campus Title IX Coordinator at the end of the Fall semester.

WHAT HAPPENS IF A STUDENT DOES NOT COMPLETE SPARC?

The completion of SPARC is essential for the University to maintain compliance with New York State Education Law Article 129-b. However, equally as important is the University's commitment to creating and maintaining a safe and respectful culture for its students. To do so, it is imperative that we educate our students about the spectrum of sexual and interpersonal violence and how to prevent these incidences before they occur, as well as the process to report a violation and the resources that are available at each campus should a student need support.

If after a student has had ample time to comply with the training requirement and has not completed SPARC, the student would be prohibited from registering for classes until the training is completed.

After the start of a student's first semester of enrollment, a no impact NSI is placed on the record in CUNYfirst if the SPARC training has not been completed. The NSI will not prevent student registration for the subsequent semester. However, the NSI will appear as a Service Indicator in the CUNYfirst Student Center that needs to be resolved and it will note the outstanding training requirement.

If a student has not completed SPARC by the time registration opens for his/her third semester, a negative service indicator will be placed on the CUNYfirst record to prevent registration. This NSI will remain until the student complete SPARC training.

The above schedule should help students and campuses comply with the requirements for Title IX/EIE training in a way that provides ample notification and time for students to complete the training without unduly impeding student enrollment. By completing the SPARC training in a timely manner, students will be able to maintain their enrollment while adhering to the University's commitment to creating and maintaining a safe and respectful environment for its students.

NO IMPACT NEGATIVE SERVICE VS. NO ENROLLMENT INDICTORS

Each campus has the authority to grant access to as many administrators as required, for service indicator placement and release.

Message in CUNYfirst Student Center: *You have not successfully completed your required SPARC Training. The purpose of this training is to educate members of the campus community on policies that requires all New York State colleges and universities to provide sexual and interpersonal violence prevention and response education and training to new students, how they report incidents and the resources available to assist them. Log into your Blackboard account and complete the training at your earliest convenience. Once completed, it will be marked complete in your To-do list. Please contact (Place Name, Contact Information for each Individual Campus) if you have any questions.*

ROLES

The campus CSAO and/or their designee are responsible for overseeing the management of the SPARC online course and ensuring students complete the training. Annually, University will provide your college's CSAO and/or their designee with compliance instructions, trainings, general FAQs, and technical assistance to adapt SPARC at their campuses. The goal is to increase the rate of SPARC training completion; provide adequate services to students; verify completion of SPARC training; increase accessibility and availability of information; and provide consistent information across campuses.

University Office Roles

- **The Office of Risk, Audit, and Compliance** - oversees and shares information pertaining to the University SPARC compliance rate, including compliance rates by college, facilitate and ensure collaboration and cooperation between the University office units involved in the process
- **University Title IX Director** – notifies college CSAO when SPARC training becomes available each semester; collaborate with University CIS (Computing and Information Services) Enterprise to update SPARC training content on Blackboard; liaise with college CSAO and/or their designee to resolve campus specific issues regarding SPARC training
- **University Executive Registrar** - manages, in consultation with University CIS Enterprise, the assignment of SPARC Online Training on students' *To-Do* list in CUNYfirst to student population; triggers student SPARC data flow process in collaboration with University CIS Enterprise; collaborates with University Title IX Director to resolve compliance data concerns
- **University CIS Enterprise** – provides technical help with the development of the content for the SPARC training course; resolve technical issues; collaborate with University Executive Registrar to implement student SPARC Data Flow
- **University Athletics Associates Director of Compliance** - collaborates with campus athletic directors to ensure SPARC compliance of all student athletes; trouble shoots with University Director of Title IX on any issues or concerns

Campus Roles

- **Chief Student Affairs Officer** – In collaboration with the Title IX coordinator, the CSAO, and/or their designee, administers the SPARC online course for respective campus; collaborates with Enrollment Management to ensure SPARC requirements are communicated within new student communication plans; implements campus specific plan to batch assign SPARC to special and high-risk student populations; communicates with Title IX Coordinator for campus specific compliance; addresses override requests, issues and concerns regarding SPARC.
- **Chief Enrollment Officer** – ensures communications about the SPARC training requirement are included in the college's new student communication plan. Collaborates with the CSAO and the units that are most involved with the admission and onboarding of new first-year students and transfer students

- **Registrar** – works with and responds to the CSAO’s and/or Designee’s requests for assistance with the placement of service indicators.
- **Title IX Coordinator** - Monitors campus SPARC compliance; collaborates with CSAO and/or their designee on override issues and concerns; ensures high-risk population are assigned in collaboration with Registrar
- **Athletic Director/Compliance Officer** - ensures student-athletes are enrolled in SPARC and complete the training prior to any athletic participation
- **Help/Service Desk** - opens support tickets and assigns them to the appropriate resources at the campus for resolution.
- **Blackboard Administrators** - assists with Blackboard application related questions or technical issues.

CONCLUSION

We encourage campuses to launch a robust campaign to urge students to complete the SPARC training once it is made available.

Should students encounter any difficulty with the SPARC training, please direct them to report this to their campus Help Desk, where a ticket will be generated to resolve the issue. Technical issues for accessing SPARC training via Blackboard should be directed to the campus Blackboard administrator; functional or content issues with SPARC training should be directed to the Student Affairs Office.

If you have any questions regarding this memo please contact the University Title IX Director.

APPENDIX

Chart 1 – SAMPLE Compliance Measure

SPARC Enrollment Dashboard Report

Report Run Parameters:

Institutions : All Institutions
Term : 1200 - 2020 Fall Term

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Run Date: 7/27/20
Run Time: 10:03:15 AM

Institutions	00 - Admitted Students					01 - Current Date Enrolled Students					02 - Census Date Enrolled Students					03 - W Period Date Enrolled Students					04 - Term End Date Enrolled Students				
	Count	SPARC Count	Percent Complete	Count Not Complete	Percent Not Complete	Count	SPARC Count	Percent Complete	Count Not Complete	Percent Not Complete	Count	SPARC Count	Percent Complete	Count Not Complete	Percent Not Complete	Count	SPARC Count	Percent Complete	Count Not Complete	Percent Not Complete	Count	SPARC Count	Percent Complete	Count Not Complete	Percent Not Complete
Baruch College	1540	21	1	1519	99	340	23	7	317	93	340	23	7	317	93	340	23	7	317	93	340	23	7	317	93
Borough of Manhattan CC	2385	86	4	2299	96	1306	137	10	1169	90	1306	137	10	1169	90	1306	137	10	1169	90	1306	137	10	1169	90
Bronx CC	773	18	2	755	98	510	30	6	480	94	510	30	6	480	94	510	30	6	480	94	510	30	6	480	94
Brooklyn College	1547	55	4	1492	96	2562	146	6	2416	94	2562	146	6	2416	94	2562	146	6	2416	94	2562	146	6	2416	94
City College	1273	19	1	1254	99	398	26	7	372	93	398	26	7	372	93	398	26	7	372	93	398	26	7	372	93
College of Staten Island	1229	143	12	1086	88	1666	260	16	1406	84	1666	260	16	1406	84	1666	260	16	1406	84	1666	260	16	1406	84
Graduate Center	686	9	1	677	99	10	3	30	7	70	10	3	30	7	70	10	3	30	7	70	10	3	30	7	70
Guttman CC	9			9	100																				
Hostos CC	347	1		346	100	87	3	3	84	97	87	3	3	84	97	87	3	3	84	97	87	3	3	84	97
Hunter College	3893	233	6	3660	94	1197	193	16	1004	84	1197	193	16	1004	84	1197	193	16	1004	84	1197	193	16	1004	84
John Jay College	1565	37	2	1528	98	791	43	5	748	95	791	43	5	748	95	791	43	5	748	95	791	43	5	748	95
Kingsborough CC	257	9	4	248	96	260	12	5	248	95	260	12	5	248	95	260	12	5	248	95	260	12	5	248	95
LaGuardia CC	558	1		557	100	1209	17	1	1192	99	1209	17	1	1192	99	1209	17	1	1192	99	1209	17	1	1192	99
Lehman College	2072	69	3	2003	97	1676	111	7	1565	93	1676	111	7	1565	93	1676	111	7	1565	93	1676	111	7	1565	93
Medgar Evers College	333	15	5	318	95	601	40	7	561	93	601	40	7	561	93	601	40	7	561	93	601	40	7	561	93
NYC College of Technology	683	35	5	648	95	944	73	8	871	92	944	73	8	871	92	944	73	8	871	92	944	73	8	871	92
Queens College	1983	86	4	1897	96	1786	144	8	1642	92	1786	144	8	1642	92	1786	144	8	1642	92	1786	144	8	1642	92
Queensborough CC	990	58	6	932	94	1497	92	6	1405	94	1497	92	6	1405	94	1497	92	6	1405	94	1497	92	6	1405	94
School of Journalism	27			27	100																				
School of Labor&Urban	34	2	6	32	94	9	2	22	7	78	9	2	22	7	78	9	2	22	7	78	9	2	22	7	78
School of Medicine	35			35	100																				
School of Professional	451	26	6	425	94	365	55	15	310	85	365	55	15	310	85	365	55	15	310	85	365	55	15	310	85
School of Public Health	246	6	2	240	98	137	6	4	131	96	137	6	4	131	96	137	6	4	131	96	137	6	4	131	96
York College	388	10	3	378	97	682	51	7	631	93	682	51	7	631	93	682	51	7	631	93	682	51	7	631	93
Total	23304	939	24.82	22365	75.18	18033	1467	12.29	16566	87.71	18033	1467	12.29	16566	87.71	18033	1467	12.29	16566	87.71	18033	1467	12.29	16566	87.71

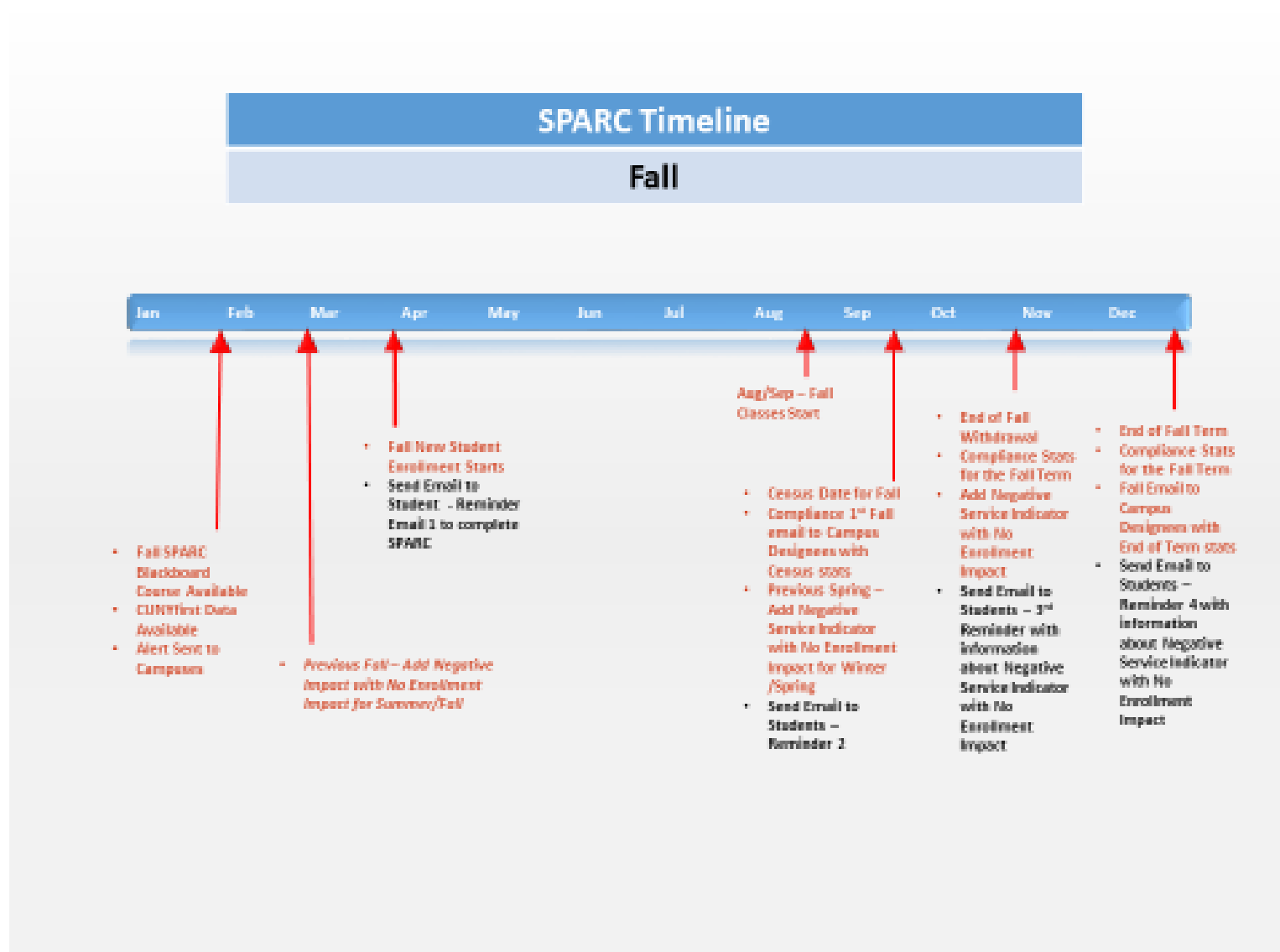
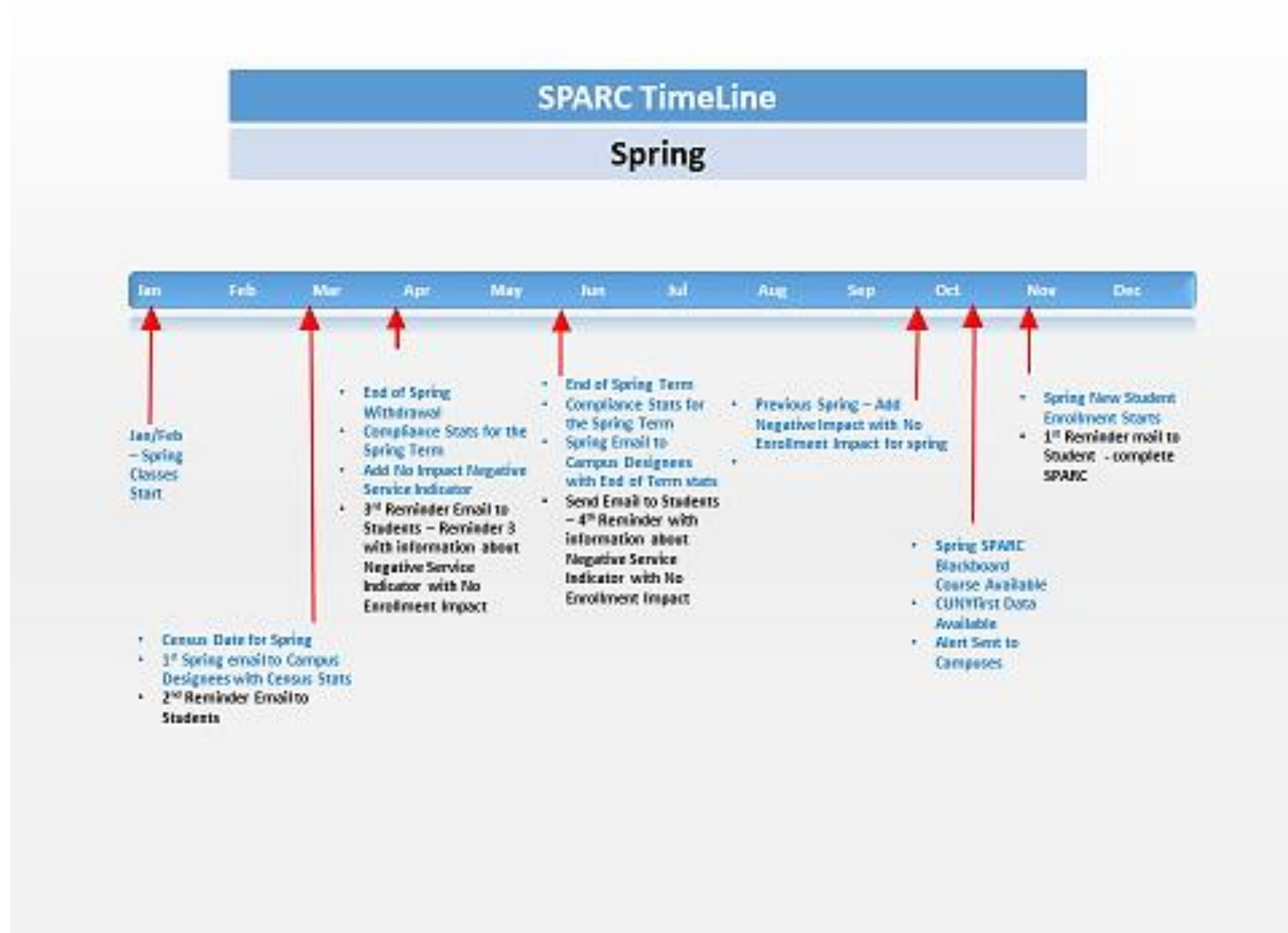


Chart 3 - SPARC TIMELINE - SPRING



Student SPARC Data Flow

PART ONE: SPARC enrollment data from CUNYfirst to Blackboard

Step 1: CUNYfirst

University Operations assigns SPARC Online Training on the students' To-Do List in CUNYfirst to identify the new student population at 9am daily.



Step 2: CUNYfirst

At 11am daily, CUNYfirst will generate SPARC enrollment files that contain student population based on the To Do List



Step 3: Blackboard

SPARC enrollment files get loaded to Blackboard daily at 12pm. Student will have access to SPARC on the day after the checklist is added.

PART TWO: SPARC completion data from Blackboard to CUNYfirst

Step 1: Blackboard

Every day at 8:30pm, Blackboard generates a list of students who have completed SPARC.



Step 2: CUNYfirst

Every day at 9pm, SPARC completion files are put into CUNYfirst to remove SPARC Training from the To-do List.



Step 3: CUNYSmart

Every day at 10pm, SPARC Compliance Dashboard is updated with completion data.

Chart 5 - Runbook

MONTH	ACTION	DATE
February	The University Title IX Director notifies the CSAOs that SPARC training is available in Blackboard for Fall admits, and they should begin to monitor compliance rates in CUNYfirst.	02/01/XXXX
March	RAC sends the <u>first compliance report</u> for new Spring students to the President, CSAO, and Campus Title IX Coordinator following the Spring semester Census date.	02/20/XXXX
March	CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst record of the prior Fall's new students who did not complete SPARC. This NSI will prevent registration in the Summer/Fall terms.	03/01/XXXX for Fall XXXX -1
April	CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst records of new Spring students who have not completed SPARC. This NSI will not prevent registration in the Summer/Fall terms.	04/01/XXXX
April	Campuses begin to notify new Fall students of the requirement to complete SPARC.	04/01/XXXX for Fall XXXX
May	RAC sends the <u>final compliance report</u> for new Spring students to the President, CSAO, and Campus Title IX Coordinator at the end of the Spring semester.	05/30/XXXX for Spring XXXX
September	RAC sends the <u>first compliance report</u> for new Fall students to President, CSAO, and Campus Title IX Coordinator following the Fall semester Census date.	09/20/XXXX for Fall XXXX
September	CSAO and/or Designee places a Negative Service Indicator (NSI) on the CUNYfirst records of the prior Spring's new students who did not complete SPARC. This NSI will prevent registration in the Winter/Spring terms.	09/20/XXXX for Spring XXXX
November	CSAO and/or Designee will place a Negative Service Indicator (NSI) on the CUNYfirst records of the new Fall students who have not completed SPARC. This NSI will not prevent registration in the Winter/Spring terms.	11/01/XXXX for Fall XXXX
November	The University Title IX Director notifies the CSAOs that SPARC training is available in Blackboard for Spring admits, and they should begin to monitor compliance rates in CUNYfirst.	11/01/XXXX for Spring XXXX +1
November	Campuses begin to notify new Spring students of the requirement to complete SPARC.	11/01/XXXX
December	RAC sends the <u>final compliance report</u> for new Fall students to the President, CSAO, and Campus Title IX Coordinator at the end of the Fall semester.	01/01/XXXX + 1