



D. STAFFORD & ASSOCIATES

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February 14, 2022

James F. Russell
Director of Procurement

Director Russell,

In response to your request, we are submitting the attached proposal for consideration. D. Stafford & Associates is a professional consulting firm specializing in campus safety, campus security, and law enforcement issues on college and university campuses, including specialization in compliance with Federal Regulations such as the Clery Act and Title IX. We do not provide consulting services to other industries, as the higher education environment is our niche.

Our associates are highly-skilled practitioners who have significant experience conducting Title IX, Title VII and ADA investigations and consulting services for colleges and universities across the country, both as full time professionals and as consultants. DSA investigators specialize in conducting trauma informed investigations. Our Investigation Team consists of lawyers, former special victims unit investigators, and both student affairs and campus law enforcement administrators who have significant experience investigating allegations of sexual misconduct by both employees and students on college campuses. Our team has expertise in Title IX, Title VII and ADA and they understand how to conduct these investigations within the unique ethos of a college campus.

We have conducted numerous independent administrative investigations for colleges and universities, including but not limited to: Fairmont State University, Hampden Sydney College, Virginia Commonwealth University, George Mason University, University of Virginia at Wise, American University, Wilmington University, and Queens University.

We have been featured as expert speakers at national conferences, conducted nationally broadcasted webinars, and authored articles, booklets and whitepapers on compliance and risk management issues for various organizations and associations, including but not limited to the American Council on Education (ACE), National Association of College and University Business Officers (NACUBO), National Association of College and University Attorneys (NACUA); the National Association of Clery Compliance Officers and Professionals; and United Educators. We are also a preferred vendor of United Educators. In fact, all of these organizations have recommended or referred their member institutions to D. Stafford & Associates for various consulting services.

We look forward to assisting George Mason University with conducting their Title IX, Title VII and ADA investigations and providing other potential consulting and training services.

Sincerely,

Dolores A. Stafford, President & CEO



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& ASSOCIATES

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George Mason University

Title IX, Title VII and ADA Investigation and Consulting

Submitted by:

Dolores A. Stafford

President and CEO

February 14, 2022

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Appendix 1 (Sample Report)

Section XII. B. Specific Requirements 2. Qualifications and Experience D. Sample Reporting

DSA has provided a Sample Report format.



APPROACH AND METHODOLOGY

GMU RFP: Section X. Statement of Needs

Section X. A. Approach and Methodology: Offerors must describe their approach and methodology to address the following:

1. Investigative research relating to Title IX and EO

DSA investigators are subject matter experts in Title IX, as well as other federal laws implicated in the employment and education setting including the Clery Act (VAWA), Title VII, and the ADA. In addition to serving as investigators, DSA lead investigators all teach multi-day Title IX Investigation and Coordinator courses throughout the United States. The Investigators are also familiar with most state laws affecting higher education conduct codes and disciplinary process, including Virginia codes addressing campus safety.

DSA assigns cases to investigators based on the particular scope of the case. For example, employment cases utilize an investigator with a background in human resources and civil rights. Cases with a parallel track with a criminal investigation may utilize an investigator with a law enforcement background. DSA investigators include career student affairs professionals, lawyers, campus law enforcement professionals and licensed PIs.

2. Interviews.

DSA investigators are trained in conducting trauma-informed investigations. As a company, we define that as conducting an investigation that minimizes the likelihood of re-traumatization and starts from a place of belief and respect to all parties and witnesses. DSA investigators meet this goal in a number of ways from using non-adversarial interview spaces to careful phrasing of questions to eliminate judgement or the perception of judgement. DSA investigators utilize the DSA Interview Framework, a structured, behavior-based interview model that we find most effective in building rapport while eliciting important factual details.

For DSA investigators, trauma-informed investigations do not, however, avoid asking the hard and difficult questions. We recognize that sometimes rapport is lost and an interview is difficult for the interviewee because the investigator cannot avoid relevant topics and questions in an effort to be effective fact-finders. DSA investigators are skilled at listening for evidence that speaks to credibility, from evasive language to collusion.

3. Report writing.

DSA investigative reports start at the end—by recognizing the target audience and the ultimate purpose of the investigative report—to assist the decision-maker in making the determination. In cases that are going



to a hearing, the report provides the framework for the hearing officer and it sets the boundaries of relevant information. At the same time, DSA investigators are cognizant that the report is also, in most cases, shared with the parties and their advisors, and could potentially be used in future legal action. Given the audience and the importance of what is contained, DSA reports are written in plain and neutral language, while at the same time reflecting the severity and emotion of the interviews. Finally, DSA reports are tailored to meet compliance requirements built into institution policy as well as federal guidelines including Title IX regulations that outline the components of the preliminary evidence sharing and the factual summary in the final report.

DSA reports include a number of standard sections, unless another framework is requested by the client institution. The “scope” spells out the specific alleged behavior and the policy that is triggered, pulled from notice documents and institution policy. A “methodology” section outlines the procedural steps taken by the investigators including communications with parties and dates and attendees of interviews. The methodology also includes a catalog of evidence gathered, and the methods used to gather the evidence.

The evidence includes two sections—interview summaries (testimonial evidence) and evidence collected (documentary and demonstrative evidence). DSA investigators draft summaries of all interviews, reorganized to present the information in chronological order, while capturing any changes during the course of the interview. Quotations are used when possible, to convey specific word choices and facts. The remaining evidence is presented as exhibits, with author and dates identified, if known.

DSA includes additional sections to the report depending on the case. A timeline is frequently utilized in cases that span a timeframe, such as a dating violence or stalking cases. DSA utilizes technology to capture text messages and convert to spreadsheet form for ease of reading and access for decision-makers.

4. Evidence review.

DSA investigators are meticulous in gathering and cataloging all evidence provided from the parties, the witnesses and the institution. Additionally, investigators identify additional evidence (including testimonial) and partner with the institution to collect it, including photographs, video footage and card swipe data.

As part of Title IX final reports, the investigators draft a “summary of the relevant evidence.” Investigators carefully assess all evidence received to determine its relevance and collate the information into a summary that is meticulously organized and intuitive to the ultimate hearing officer.



5. Consultation with Title IX Coordinator and/or DEI leadership on remedies to stop and prevent recurrence of specific matters related to consultation.

All lead DSA investigators have worked in higher education and understand that institutions must be “proactive” to reduce its need to be “reactive.” The relationship between the investigator and the institution is important and DSA believes in open lines of communication while at the same time maintaining investigative independence.

DSA investigators are thought leaders in threat assessment response on campus and are trained to recognize the issues that could arise and have impact to campus. From identifying students of concern through the interview process, to evidence of no-contact order violations, DSA investigators remain in constant communication with the institution. From a procedural perspective, DSA “lives” in institution policy while conducting an investigation and will contact the institution if process concerns are raised or if information comes to light of different violations of institutional policy.



SPECIFIC REQUIREMENTS

GMU RFP: Section XII. B. Specific Requirements

1. Procedural Information

2. Qualifications and Experience

1. Procedural information:

a. Return signed cover page and all addenda, if any, signed and completed as required.

SEE DOCUMENT INCLUDED IN THIS PDF—PAGE 37

b. Return Attachment A - Small Business Subcontracting Plan.

SEE DOCUMENT INCLUDED IN THIS PDF—PAGE 38

c. State your payment preference in your proposal response. (See section XV.)

DSA chooses Option#3- Net 30 Payment Terms. Vendor will enroll in Paymode-X where all payments will be made electronically to the vendor's bank account. For additional information or to sign up for electronic payments, go to <http://www.paymode.com/gmu>. There is no charge to the vendor for enrolling in this service.

2. Qualifications and Experience: Describe your experience, qualifications and success in providing the services described in the Statement of Needs to include the following:

a. Describe your experience in providing similar services described in the Statement of Needs.

D. Stafford & Associates (DSA) began providing Title IX investigative services in 2012. At that time, the President & CEO of the company recognized that some of her existing clients were in need of a trusted and experienced entity to provide independent investigation services. This service line was added for a myriad of reasons including the fact that some of the institutions did not have trained investigators of their own. Furthermore, many of our clients who use our investigative services do not have a volume of cases sufficient to justify hiring and training an investigator (or they don't want to hire or train an investigator because the small caseload does not allow the investigator enough volume to become or remain proficient with their investigative skills.)

What we know from years of experience is that individuals conducting Title IX investigations must regularly investigate cases to hone their craft and remain top-notch fact-finders. We also have clients that use DSA to supplement their current investigative staff. In some cases,



institutions use us when they hit peaks in their volume of cases and they need additional support. In other cases, they use us when they have a high-profile case, or other instances in which actual or perceived conflicts of interest are most effectively remedied by employing an outside, impartial and seasoned investigative team. For example, one client institution hired DSA to investigate a case that involved allegations of sexual misconduct against a tenured professor and allegations by that professor that the President of the institution violated institutional and State policies during the initial handling of the case.

This industry has now seen a significant increase in the number of law firms and individuals offering investigative services to institutions of higher education. This is becoming a big business that is drawing people from outside higher education into the college and university environment. Many law firms now have attorneys in their higher education practice groups offering investigative services. We are also seeing individuals with municipal law enforcement experience retiring and offering investigative services to colleges and universities. The challenge for institutions of higher education is that many of the lawyers who are offering these services do not have any significant level of expertise in Title IX beyond reading applicable Dear Colleague Letters. Many of the former law enforcement officers who are offering investigative services have experience conducting police investigations, but they may not have specialized training or experience in conducting civil rights investigations for college and university campuses., and the unique communities they serve. Moreover, experience in municipal policing is very different than community policing in the campus environment, and the differences are especially pronounced when investigating reports of sexual misconduct and other forms of sex-based harassment for which Title IX, the Clery Act (VAWA), or both apply. Investigators must be attuned to the culture of higher education and have significant training and experience in working with college student victims of dating violence, domestic violence, stalking and non-stranger sexual assault. It is now a significant challenge for institutions of higher education to find qualified civil rights investigators who have expertise in both Title IX and the Clery Act and can meet the needs of diverse institutions and constituencies.

The reality is, there are only a few private companies that have significant expertise in Title IX that specialize in providing a suite of Title IX services, including independent investigative services, and DSA is one of those companies. While we provide Title IX Policy Review and Development Services, Title IX/Civil Rights Investigative Services, Title IX training classes for individual institutions based on their unique Sexual Misconduct Policy/Procedure(s), national Title IX Coordinator/Investigator classes and Responsible Employee training (in-person and on-line), this part of the scope focuses on the DSA Civil Rights Investigative Services, including Title IX, Title VII and ADA.



There are a few key factors that set us apart from those other companies:

Background: DSA has carefully and intentionally brought together an leadership team for conducting investigations with a variety of backgrounds that all serve to strengthen the investigative team as a whole, including an attorney and higher education human resource specialist; several student affairs specialists, who have served as Title IX Coordinators/Deputy Coordinators (one of which is also an attorney); a campus law enforcement investigator who also focused on victim advocacy and support services, and a company president who developed and spent twenty years leading a Sexual Assault Response Team (SART) at two universities.

Experience: DSA employs a team of professionals who are experienced, skilled and well trained fact-finders to provide these services (see Biographies for more information about the individual team leaders).

Price: DSA has focused on providing consulting and investigative services and maintains a strong company philosophy of wanting to remain an affordable option for our clients, while providing an exceptional quality of service.

Approach: DSA prefers to use a team approach when conducting civil rights investigations and most investigations are conducted by a team of two investigators, as opposed to a single investigator model. This allows the lead investigator to build a rapport with the interviewee and initiate a back-and-forth conversation without the need to take notes or break the flow of the conversation. DSA also has an organized approach in managing the investigative process, from intake to submission of the final report (see the DSA Approach and Process for Managing Title IX Investigations in the methodology section below for more information).

Overview of Company Qualifications

D. Stafford & Associates (DSA) is a professional consulting firm specializing in campus safety, campus security, and law enforcement issues on college and university campuses, including specialization in compliance with Federal Regulations such as the Clery Act and Title IX. Over the past ten years, DSA has earned a national reputation for our expertise in Title IX compliance related issues.

DSA developed a national Title IX Coordinator/Investigator class in 2012 and subsequently launched several investigative classes, including *Investigation of Sex Crimes for Campus Police, Public Safety and Conduct/Title IX Civil Rights Investigators: Conducting Trauma-Informed Investigations*. DSA has provided training in these areas to over 8,000 college and university administrators around the country. DSA has also provided these training classes on individual campuses for more the forty institutions of higher education.



Our associates are highly skilled practitioners who have significant experience conducting Title IX civil rights investigations for colleges and universities across the country, both as full time professionals and as consultants. Our team of investigators has expertise in Title IX and they understand how to conduct these investigations within the unique ethos of a college campus.

The DSA investigative team members all have a significant amount of investigative experience and training in conducting investigations prior to joining the company. In addition to what they bring to DSA, they are required to successfully complete a combination of D. Stafford & Associates training programs, including but not limited to:

- Title IX Coordinator/Investigator Training (3.5 days);
- Investigation of Sex Crimes for Campus Police, Public Safety and Conduct/Title IX Civil Rights Investigators: Conducting Trauma-Informed Investigations (3 days);
- Investigation of Domestic/Dating Violence and Stalking for Campus Police and Public Safety Agencies (3 days); and/or
- Combined Sexual Misconduct and Dating/Domestic Violence and Stalking Investigation Training (4 days); and/or
- Advanced Investigations Course: Investigations of Sexual Misconduct Conducting Trauma Informed Investigations Designed for Campus Police/Public Safety/Title IX & Conduct Officers (4.5 days)

These training experiences help to ensure consistency among the D. Stafford & Associates Investigations Team members. In addition, we provide specialized training and detailed instruction to our team of investigators on topics such as advanced interviewing, assessing credibility, consent, alcohol and incapacitation, the role of technology in the investigation of complaints of sexual and interpersonal violence, and statement analysis, where they are taught to analyze the veracity of written statements from leading experts in the Federal Bureau of Investigation.

DSA has experience conducting a wide variety of investigations. Some are more straightforward and others have been incredibly complex. The investigations have included traditional word-on-word consent-defense investigations involving a single complainant and accused party with no witnesses; investigations involving multiple complainants and accused parties and multiple scenes; investigations involving multiple witnesses in addition to the involved parties; investigations involving faculty (tenured) or staff as the complainant and/or the accused; investigations involving a victim and accused party who are of the same sex; and investigations involving allegations against a college president.



ABOUT THE PRESIDENT & CEO

GMU RFP: Section XII. B. Specific Requirements

2. Qualifications and Experience

b. Names, qualifications (including licenses, insurance, certification, etc.) and experience of personnel to be assigned to work with Mason.

c. Resumes (Bios) of personnel working with Mason.



Ms. Stafford was the Chief of Police at The George Washington University in Washington, DC from 1992-2010. During her distinguished 26 year career in the law enforcement and security industry, she worked in Campus Law Enforcement for 23 years at Bucknell University, Butler University, and most recently, at the George Washington University, where she served as Chief of Police of a 176 member police department for 18 years. Chief Stafford retired from active law enforcement on May 5, 2010. She has a Bachelor's Degree in Criminal Justice from Mansfield University and has a Master's of Science Degree in Education from Bucknell University. Chief Stafford is a Certified Litigation Specialist.

As one of the nation's premier campus police chiefs, she is a much sought after speaker, consultant, educator, expert witness, and instructor on campus security, campus safety and law enforcement related issues and on compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (The Clery Act) and the security and safety requirements of the HEOA.

Chief Stafford has won numerous accolades for her 26 years of service in the law enforcement field. She won the "Breaking the Glass Ceiling" award in 2002 in honor of her ongoing contributions to improving the law enforcement profession. In 2004, Stafford was honored by the European Association for Campus Security for her expertise and achievements in campus security. Campus Safety Magazine awarded her their 1st Annual Campus Safety Director of the Year Award for 2006. In June 2008, Chief Stafford was presented with the Distinguished Young Alumni Award by her alma mater, Mansfield University in Pennsylvania.

She has been a member of the International Association of Campus Law Enforcement Administrators (IACLEA) since 1990 and she served on the Board of Directors from 2000-2005. She served as the Chair of the IACLEA Accreditation Commission from 2005-2008 and she served as the 45th President of the International Association of Campus Law Enforcement Administrators in 2003-2004, she was the first female to hold that office.



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Chief Stafford has been a keynote speaker and has conducted presentations on the Clery Act for various organizations, including IACLEA, NACUBO, American Council on Education (ACE); the Stetson Law Conference, Security on Campus Inc, and other video/teleconference training companies.

She was a member of the IACLEA Government Relations Committee from 1995 to 2010 and was the Committee Chair from 1998 to 2000. Chief Stafford has testified at several congressional hearings, one at the request of the U.S. House of Representatives in July of 1997 and another hearing at the request of the U.S. Senate in March of 1998. Chief Stafford was selected to represent IACLEA as the primary negotiator during the 1999 and 2009 Negotiated Rule Making processes sponsored by the Department of Education regarding the development of final rules for the implementation of the Clery Act. She is a nationally recognized expert on compliance with the Clery Act.

Chief Stafford has been a featured speaker in many other areas of security and safety for the American Council on Education (ACE); American Association of State Colleges and Universities (AASCU); National Association of Student Personnel Administrators (NASPA), the National Association of College and University Business Officers (NACUBO); University Risk Management and Insurance Association (URMIA); Stetson University College of Law; and the International Association of Campus Law Enforcement Administrators (IACLEA).

Chief Stafford led the GW Police Department as the agency became an internationally accredited law enforcement agency with the Commission of Law Enforcement Accreditation (CALEA) in March of 2006 and the agency was successfully reaccredited in March of 2009. The agency subsequently achieved accreditation with the International Association of Campus Law Enforcement Administrators in May of 2007. She was chosen to become an assessor for CALEA in March 2006 and she is currently an IACLEA assessor, and as such, she has completed numerous on site assessments for those organizations.

She has published more than a dozen articles in various professional journals and magazines. She was one of the lead authors of the International Association of Campus Law Enforcement Administrator's [Blueprint for Safer Campuses: An Overview of the Virginia Tech Tragedy and Implications for Campus Safety](#). This document, unveiled at a press conference sponsored by the Woodrow Wilson School at Princeton University on April 18, 2008, is a roadmap for campus safety and security. The Blueprint for Safer Campuses outlines the guiding principles for campus safety and security worldwide.



Bios for DSA Title IX Leadership Team

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2. Qualifications and Experience

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Adrienne Meador Murray, Vice President, Equity Compliance and Civil Rights Services



In January 2014, Adrienne Meador Murray joined D. Stafford & Associates where she currently serves as the Vice President, Equity Compliance and Civil Rights Services after having been affiliated with D. Stafford & Associates as a part-time Associate since 2012 and the National Association of Clery Compliance Officers & Professionals (NACCOP) where she currently serves as Director of Training and Compliance Activities. Murray began her career in municipal law enforcement as a civilian employee with the City of Richmond Police Department (Virginia). She graduated from the Virginia Commonwealth University Police Training Academy and began her career as a sworn police officer for the University of Richmond (UR) Police Department (Virginia). At UR, Murray progressed through the ranks from a night shift patrol officer to Operations Lieutenant (overseeing criminal investigations, crime prevention and patrol) over the span of a decade before becoming the Chief

of Police at Davidson College in North Carolina. Most recently, Murray served as Chief of Police at Trinity Washington University (in Washington, D.C.).

As the Executive Director, Equity Compliance and Civil Rights Services for DSA, Murray builds on her 17-year career in law enforcement in which she became a nationally recognized expert in the field of best practice postsecondary institutional response to the sexual victimization of college women in the United States and in Canada. She is also a trained civil rights investigator and is well respected throughout the country for her ability to aid institutions in understating how to do best practice criminal and civil rights investigations concurrently. She is well known for her work in having provided support, advocacy and criminal investigative services for victims of sexual assault, stalking and intimate partner violence and is



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a sought-out speaker and investigator. She has expertise in the construction of best practice law enforcement standard operating procedures and training police officers to respond in best practice and trauma-informed ways to victims of sexual assault and intimate partner violence. In her current role, Murray coordinates curriculum development and instruction for national classes, including basic and advanced sexual misconduct investigation classes; an investigation of dating violence, domestic violence and stalking class; and a Title IX Coordinator/Investigator class offered through D. Stafford & Associates. To date, Murray has trained more than 3,500 criminal and civil rights investigators throughout the U.S.

Drawing on her experiences as a trained criminal and civil rights investigator, Murray also oversees independent investigations of complex sexual misconduct cases; conducts audits of Title IX/VAWA Compliance; drafts institutional sexual misconduct policies and procedures; and conducts campus-based trainings pertaining to the resolution of sexual misconduct offenses on college and university campuses. Murray frequently presents at regional and national conferences on topics such as the *Sexual Victimization of College Women*, *Understanding Consent and Incapacitation*, and *Responding to Sexual Assault on Campus: Clery Act and Title IX Implications*. Murray also conducts provincially specific sexual misconduct trainings throughout Canada.

Murray is a graduate of the University of Richmond, where she received her Bachelor's Degree in Applied Studies in Human Resource Management and of New England College, where she received her Master's Degree in Campus Public Safety Administration. Murray is also a graduate of the 235th session of the prestigious FBI National Academy where she was awarded a graduate certificate in Criminal Justice from the University of Virginia. She has authored numerous journal articles.



Catherine Cocks, M.A.
Consultant, Student Affairs, Title IX, and
Equity Compliance Services



Ms. Cocks has been a higher education professional for over thirty years. Her work with D. Stafford & Associates focuses on Title IX investigations and training; assessment of student affairs policies, practices and services; and behavioral threat assessment. Cathy was the Director of Community Standards for the University of Connecticut for 14 years where she managed the student conduct process, which included managing all Title IX cases involving student respondents and chaired the University's student threat assessment team. Prior to that, she held several positions within Residential Life at the University of Connecticut and Roger Williams University.

She is a faculty member for the Association for Student Conduct Administration's (ASCA) Donald D. Gehring Academy teaching on subjects such as ethics, governance, threat assessment, media relations, and higher education trends. She was an affiliated faculty

member for many years in the University of Connecticut's Higher Education and Student Affairs Master's program teaching "The Law, Ethics, and Decision-Making in Student Affairs."

Cathy has co-authored the "Philosophy of Student Conduct" chapter in the 2nd edition of "Student Conduct Practice" (2020) and was a member of the writing team for CAS Standards' Cross-functional Framework for Identifying and Responding to Behavioral Concerns.

Cathy is a Past President of ASCA. She has also served as a Circuit representative, co-chair of the Public Policy and Legislative Issues Committee, and as a member of the ASCA Expectations of Members Task Force. Cathy has served in a variety of leadership roles in NASPA Region I.

She was the 2015 recipient of ASCA's Donald D. Gehring Award. She is a past recipient of the NASPA Region I Mid-Level Student Affairs Professional Award and the NASPA Region I Continuous Service Award.

She earned her Master's degree in Higher Education Administration from the University of Connecticut and Bachelor's degree in Communications/Media from Fitchburg State University.



Beth Devonshire, Consultant
Equity Compliance and Title IX/Civil Rights Training



Beth Devonshire, J.D. is an experienced student affairs professional with expertise in student conduct, Title IX, threat assessment teams, policy development, trainings for various constituencies, and the impact legislative and legal decisions have on higher education. From 2006-2018, Ms. Devonshire worked as the Associate Dean of Students at UMass Boston, the Director of Community Standards at Bridgewater State University, and the Director of Community Standards at Stonehill College. In these roles, Ms. Devonshire was charged with oversight of the student conduct systems, membership in CARE/BIT teams, serving as the Deputy Title IX Coordinator, and drafting policies and procedures related to students. Prior to her work in higher education, Beth served as a law clerk for the Justices of the Superior Court in Massachusetts and in multiple roles at the Massachusetts State House.

Ms. Devonshire has been an Associate with D. Stafford & Associates (DSA) since 2012 and she joined as a full-time consultant in August of 2018. In this role, Beth works with institutions on issues involving Title IX, Clery Act, threat assessment, and other compliance related issues; and advises on policy and procedures, conducts trainings, participates in investigations, reviews enforcement practices of campus law enforcement, and serves in interim roles. Ms. Devonshire also speaks on a variety of other topics including legislative and legal issues impacting higher education including FERPA, Clery, and Alcohol and other Drug Prevention.

Ms. Devonshire is a faculty member in New England College's Doctorate of Education Program and the Higher Education Administration program at Bridgewater State University. Additionally, Ms. Devonshire serves on the Public Policy Division for NASPA, and is also the former Massachusetts Public Policy Liaison for MA NASPA. Beth also served as the Director of the Legislative Committee for the Association for Student Conduct Administrators (ASCA) for two years.

Ms. Devonshire is a member of the Massachusetts Bar. She is a graduate of Stonehill College with a degree in English and Secondary Education and holds a J.D. from Suffolk University School of Law. She is also a trained mediator.



Ann Todd

Consultant, Equity Compliance and Civil Rights Investigations



Ann Todd, Esq is a seasoned civil rights investigator in higher education for D. Stafford & Associates (DSA). Ms. Todd is a graduate of Davidson College with a degree in psychology and holds a JD from the University of Nebraska. Ms. Todd joined DSA in 2015 and currently serves as a consultant, focusing on equity compliance and civil rights investigations. Ms. Todd is a subject matter expert on Title IX and Clery and provides consulting services and expert witness testimony to clients on compliance obligations with state and federal law. Her areas of expertise include reviewing and drafting policies and processes that provide equity and fairness to all parties involved and Ms. Todd is adept at facilitating discussions with institutions to ensure the end product represents the values of the campus community.

Ms. Todd also serves as a Senior Investigator for the DSA Title IX Investigations Team. She conducts external investigations on behalf of colleges and universities, specializing in investigating student allegations of sex discrimination, sexual assault, intimate partner violence, and stalking. Additionally, she brings a strong Human Resources background to investigating a range of employee misconduct—from performance issues to disability discrimination.

Prior to joining DSA, she practiced law in Charlotte, NC, specializing in employment and civil rights and worked for a number of non-profit organizations. She returned to her alma mater (Davidson College) in 2008 and worked there through March of 2016 serving as the Assistant Director of Human Resources with the responsibility of managing employee relations and the learning and development function while also serving as the deputy Title IX Coordinator.



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Ms. Todd is a frequent speaker and trainer on overseeing, investigating and resolving claims of sexual misconduct, including sexual harassment and sexual assault, in the post-secondary environment. She conducts between 20-30 courses every year, including national classes and classes for individual client institutions across the country.

Ms. Todd is licensed private investigator and a member of the NC Bar. She is a Certified Clery Compliance Officer through the National Association of Clery Compliance Officers and Professionals (NACCOP) and she is also a certified 360 facilitator through the Center for Creative Leadership. Ms. Todd lives in Davidson, NC where she volunteers for a number of local nonprofits and civic organizations.



Bios for DSA Title IX Investigative Team

GMU RFP: Section XII. B. Specific Requirements

2. Qualifications and Experience

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Investigators (In Alphabetical Order):

Debra Duncan, Esq. is a United Educators approved investigator. She began her law enforcement career as a company police officer in Greensboro, NC before transitioning to municipal policing with the High Point Police Department. She started as a patrol officer and worked her way up through the ranks serving in almost every division including patrol, investigations, and crime stoppers. In 1997 she was reassigned from patrol lieutenant to the Chief's administrative assistant, which led to her promotion to patrol commander in 1998. She was the first woman in High Point to achieve the rank of captain. During her tenure, Debra worked part time for High Point University as the liaison between the police department and the university. The university experience led to her being named as Virginia Tech Police Chief in 2001. Debra brought the community policing philosophy to Virginia Tech and implemented several initiatives, including the Adopt A Hall program. She left Virginia Tech to accept the position of Police Chief for the City of Monroe, NC, where she led the agency through the accreditation (CALEA) process. After her retirement from the City of Monroe, Debra graduated from Charlotte School of Law. She also was elected and served a four-year term on the Monroe City Council. In addition to being a licensed attorney, Debra is a reserve police officer, and through D. Stafford and Associates serves as the Interim Police Chief for Johnson C. Smith University in Charlotte and a civil rights investigator.

Debra has a Bachelor of Science degree in Justice and Policies from Guilford College and a Master of Science degree in Adult Education from NC A&T State University. She is a graduate of the FBI National Academy and several other management schools.



Debra has a history of community service including volunteering in the schools as a mentor and role model to children. The governor's office presented Debra with the *Order of the Long Leaf Pine* which is North Carolina's highest civilian award for public service.

Leslie Hanley is a United Educators approved investigator. She served 22 years with the New York City Police Department. She retired in the rank of Captain working as the Executive Officer of the Special Victims Division (SVD.)

In this role, Hanley supervised and reviewed hundreds of cases of sexual abuse and child abuse including cases of domestic violence that took place all across New York City. She worked tirelessly to ensure that the NYPD's Sex Crimes and Child Abuse Investigation Course was accredited by New York State Department of Education. Prior to her work in the SVD, she worked on patrol in various capacities as well as in the Internal Affairs and Detective Bureaus.

Hanley has a Bachelor's of Science in Criminal Justice from the State University of New York, Empire State College and also graduated from the NYPD Commanders College. She joined D. Stafford and Associates in 2014 and has been an active member of the on the Title IX Investigation Team.

William (Bill) Lafferty retired from active service in Law Enforcement and Public Safety after 35 years of experience and with over 25 years of experience within Higher Education. He began his career with the U.S. Air Force as a Security Police Specialist. During his military service, he worked his way up through the ranks and performed a variety of specialized duties within the law enforcement and security field. These duties included patrol officer duties, patrol supervision, crime prevention programming coordinator, asset and resource protection specialist, and a quality assurance reviewer. Bill was also instrumental in implementing an Air Force Anti-Terrorism response plan and protocol during his tenure.



After the Air Force, Bill joined the public safety team at Villanova University where he performed duties as a Patrol Sergeant, Shift Lieutenant, Assistant Director of Housing Security, and Associate Director of patrol and investigatory operations.

After nearly seven years at Villanova, Bill left to become the Director of Public Safety at Gettysburg College. Bill served 20 years at Gettysburg College, completing his career there as the Assistant Vice President of College Life. Bill's responsibilities included: direct strategic management oversight of all public safety operations; sexual and relationship violence response and investigation policy and protocol development; emergency operations management; life and fire safety; behavioral threat assessment; the oversight of institutional Clery Act and Title IX compliance requirements for the college; and during his tenure with Gettysburg, he managed student life development areas including: Greek Life, Student Activities, Experiential Education, and Student Conduct.

Bill went full-time with the National Association of Clery Compliance Officers and Professionals (NACCOP) and D. Stafford & Associates (DSA) in October of 2021, continuing his service as the Director of Federal Relations for NACCOP and serving as the Director, Regulatory Compliance and Public Safety Services for DSA. In his role with DSA, Bill will continue his work as an instructor of the Clery Compliance classes, including the Clery Academy and the Advanced Clery Academy, and teaching for the DSA Procedural Justice Training Institute. Bill will also serve as a team member in conducting Clery Act Audits and Assessments, Procedural Justice Assessments, and Organizational Assessments of campus police and public safety agencies.

Bill has served as the Director of Federal Relations with NACCOP since May of 2016. In this role, Bill is responsible for monitoring key public policy issues facing institutions of higher education, with a particular focus on those that impact the Clery Act. Bill is NACCOP's representative to federal agencies, Congress and other associations regarding NACCOP's views and legislative priorities within the higher



education community, public safety, and beyond. Bill has also served as an Associate of D. Stafford & Associates since 2016 as well, teaching classes and participating in Clery Act Audits and Assessments.

Bill is a graduate of Eastern University, where he earned a Bachelor's Degree in Organizational Development, and Villanova University, where he earned a Master's Degree in Criminal Justice Administration. Bill was certified as a NACCOP Clery Compliance Officer (CCO) as part of the program's first cohort in July of 2017. Bill previously served a two-year term as President for the Northeast Colleges and Universities Security Association (NECUSA).

Carolyn McMackin is a United Educators approved investigator. She has over 19 years of experience in campus law enforcement. She currently serves as the Chief of Police at Forsyth Community College in North Carolina. She began her career in campus law enforcement in 2003 and progressed from patrol officer to Assistant Chief at Davidson College Campus Police. Prior to that, she worked at University of North Carolina School of the Arts and Wake Forest University Police Department. She currently oversees the daily operations of the campus police department, investigations, special events, parking, transportation, emergency management, planning and response, professional standards and coordination of community policing initiatives.

During her career she has been responsible for Clery Crime Report, Biennial Review, Threat Assessment, Community Policing outreach efforts, development of policies and procedures, IACLEA Accreditation, coordinated Active Shooter exercises with multiple jurisdictions and campus wide Building Captain program. She also coordinated an annual Domestic Violence Lock up event, RAD (Rape Aggression Defense) program and maintains "town gown" relations.

For more than a decade, Assistant Chief McMackin has conducted complex investigations for incidents of rape, sexual assault, stalking and intimate partner violence, drug and other investigations on several campuses. Assistant Chief McMackin is a graduate of Guilford College, where she received her



Bachelor's Degree in Sports Medicine. She earned a Master's Degree in Campus Public Safety Administration from New England College. She has completed numerous specialized training courses and is certified in RAD and Threat Assessment, IACLEA LEMAP (Loaned Executive Management Program) Assessor, Bike Patrol Officer and a NC Driver's Education Instructor.

McMackin currently serves as an Associate for D. Stafford & Associates, a highly reputable consulting firm specializing in delivering on organizational, physical security, vulnerability and arming assessments; Clery Act compliance audits; assessments of Title IX compliance and a host of other services related to security, safety and compliance for institutions of higher education. She has served in this capacity since 2014.

Barbara R. O'Connor is a United Educators approved investigator. She is a veteran police officer, who has served in both municipal and university police departments. She holds a Bachelor's Degree in Criminal Justice from Westfield State University, a Master's Degree in Labor Relations from the University of Massachusetts, and a Juris Doctorate from Western New England University. She was a member of the Massachusetts Bar until her retirement in 2016.

Chief O'Connor began her career as a police officer on Cape Cod in the Town of Yarmouth, Massachusetts, where she attended the Barnstable County Police Academy in 1983. In the fall of 1983, she accepted a position at the University of Massachusetts Amherst. At UMass Amherst she worked her way up the ranks, serving as an officer, sergeant, lieutenant, and deputy chief. In October of 2001 she was appointed as the first female police chief for the department.

In 2009, Chief O'Connor accepted the position as Executive Director and Chief of Police at the University of Illinois, Urbana-Champaign. Along with overseeing the police department, Chief O'Connor



was also responsible for the Police Training Institute (PTI). PTI is a full-service residential police academy, training law enforcement officers from throughout the State of Illinois.

In March of 2011, Chief O'Connor was appointed as the Director of Public Safety and Chief of Police at the University of Connecticut and served in this capacity until her retirement in 2016. Her duties include overseeing the police department at Storrs, the regional campuses and the University of Connecticut Health Center in Farmington. In addition, as the Director of Public Safety, she has oversight of two fire departments, the 911 center for the University, the locksmiths, fire marshals, and the building inspectors for the University. After the tragedy at the Sandy Hook in Newtown Connecticut, Governor Dan Malloy formed a 16 member Sandy Hook Advisory Commission and appointed Chief O'Connor to serve as one of two law enforcement representatives. After her retirement in May 2016, Chief O'Connor has worked as an adjunct faculty member at Elms College in Chicopee, Massachusetts teaching Criminology. At New England College, in Henniker, New Hampshire, Chief O'Connor instructs a legal issues course in the Masters of Campus Public Safety program.

O'Connor currently serves as an Associate for D. Stafford & Associates, a highly reputable consulting firm specializing in delivering on organizational, physical security, vulnerability and arming assessments; Clery Act compliance audits; assessments of Title IX compliance and a host of other services related to security, safety and compliance for institutions of higher education. O'Connor has served in this role since August of 2013.

At each of these universities, Chief O'Connor proactively assessed the institutions compliance with Clery and made significant improvements. These include developing the Annual Security Report through web-based distribution and using emails for crime alerts. At Illinois and UConn, Chief O'Connor was instrumental in developing a university wide compliance team.



D. STAFFORD & ASSOCIATES

179 Rehoboth Avenue, #1121
Rehoboth Beach, DE 19971
Phone: (202) 438-5929
dolores@dstaffordandassociates.com

Steve Rittreiser is a United Educators approved investigator. He has served as a campus law enforcement officer and campus administrator for over 33 years. For the past five years he has served as the Major at the University of Washington Police Department, a CALEA accredited department serving over 42,000 students. He previously served as Central Washington University's Assistant Vice President for Business Auxiliaries and Public Safety from 2006-2011 and as Central's Chief of Police for 19 years.

Rittreiser is a highly trained investigator who has been conducting police and civil rights investigations for over twenty years. He joined the D. Stafford and Associates Team in 2013, providing consulting and investigative services for the company. He is a Senior Investigator on the Title IX Investigations Team.

Rittreiser was named the Washington State Crime Prevention Police Chief of the Year for 2003-2004 and an honorary Lifetime Achievement Award in 2007 from the Washington State Crime Prevention Association. In June, 2005 he received the International Association of Campus Law Enforcement Administrators President's Award, noting his many contributions to the campus law enforcement profession.

Rittreiser has been a featured speaker for several local, state and national conferences and is a consultant for colleges and universities on ways to improve their public safety capabilities. He was a founding member of the local Domestic Violence Task Force in Kittitas County, Washington and has been a trainer and guest lecturer in the area of campus domestic violence. In 2004, he was appointed by the Secretary of US Homeland Security to serve on the Federal Law Enforcement Training Commission's Advisory Board for State and Local Training. He is also a certified instructor through the Louisiana State University Academy of Counter-Terrorist Education and is a certified emergency management instructor. In 2006 he completed two terms on the Board of Directors of the International Association of Campus Law Enforcement Administrators. In 2014 he was a featured speaker at the End Violence Against Women



International Conference and serves as a Resource Council member to the Coalition Ending Gender-Based Violence in Seattle, Washington.

Lisa Sprague is a United Educators approved investigator. She has over 30 years of campus, city, county and state experience in the successful management of Public Safety and Law Enforcement agencies, including serving in Accredited agencies such as the Deputy Chief of Police at The Florida State University in Tallahassee, Florida, and most recently as the Deputy and Interim Chief of Police for the Crestview Police Department in Crestview Florida.

She has held the positions of Director of Public Safety at Florida Gateway College, Ohio Dominican University, Chief of Police at Truman State University in Missouri, Director of the Department of Public Safety at Stetson University in Deland, Florida and at Cornell University in New York. In each of these institutions she has held a number of leadership roles to include Behavior Intervention Teams, Clery Compliance, Emergency Management, Security Threat Assessment and Sexual Assault Response Teams.

Previously, Sprague has served as an Instructor at St Charles County Law Enforcement Academy, Broome County Law Enforcement Academy, Missouri Sheriff's Academy and the Law Enforcement Training Center for Moberly Area Community College. She has been an advisory member for the University of Missouri Law Enforcement Training Institute, Moberly Area Community College Law Enforcement Academy and the North West Florida State Police Academy. She has served as an adjunct instructor for the School of Criminology and Criminal Justice at Florida State University, Florida Gateway College, ITT Tech and the National Sports Arena Security Center. Sprague actively promotes continuing education of safety issues and annually makes presentations, publishes articles in Campus Safety Journals and conducts workshops on numerous topics.



Sprague is a certified Police Officer in the State of Florida. Her other current and past certifications include, Generalist Instructor, Defensive Tactics Instructor, National Security Clearance, Violent Patient Management Instructor, Victim Advocate Specialist, NRA Firearms Instructor, NRA Range Safety Officer, Front Line Homeland Responder Instructor, Prevention and Response to Suicide Bombers Instructor, Regional and State Emergency Response Team, Sport Event Risk Management Instructor, Traffic Infraction Enforcement Officer, Title IV Investigator and crime analysis.

Sprague has held leadership and memberships in several professional affiliations including Past President of the International Association of Campus Law Enforcement Administrators, International Association of Chiefs of Police, Florida Chiefs of Police, Florida University Chiefs of Police, Florida Criminal Justice Executive Institute Associates and is frequently called on as assessor for the Prep management assistance program. The Management Assistance Program, sponsored by the International Association of Campus Law Enforcement Administrators (IACLEA) is for the purpose of providing management consultation and technical assistance to Association members. Assessors provide assistance in improving the administration, management or operations of the agency and aid in implementing improved practices and techniques.

She has served as President of the Missouri Association of Campus Law Enforcement administrators, Chair of the Diversity Committee for the Missouri Police Chiefs Association, Missouri Police Chief Management Assessor and has also served as the Missouri Statewide subject matter expert for Cultural Diversity Materials for Mandated Curriculum for Police Officers.

Her record of public service is extensive. She has served on the Leon County, Franklin County and Columbia County Local Emergency Management Committees, Regional Domestic Security Task Force, Regional Violent Crime Committee, American Heart Association Community Board Member, American Heart Walk Captain and an active contributor for the Special Olympics Organization. She has served as past presidents of Kiwanis Clubs in Kirksville and Tallahassee. Other leadership roles have included past



president of the Kirksville Coalition for Prevention of Alcohol Abuse, Kirksville Airport and Transportation Commission and the Missouri Department of Health Injury Control Advisory Council Member.

Sprague has received numerous awards such as the National Residence Hall Honorary, Division of Student Affairs “Being There” Award, National Committee for Employer Support of the Guard and Reserve, “Patriotic Employer’ Award, Prudential-Financial-Davis Productivity Award, Nominated State of Florida Officer of the Year, Tallahassee’s 25 Women You Need to Know, Oasis Center Trailblazer Award, and the Florida Business and Professional Women Glass Ceiling Award.

Sprague currently holds a Master of Science in Criminal Justice, Columbia College, Missouri, March, 2010, A Bachelor of Science in Education: Human Services (major), Psychology (minor), May 1979, University of Miami, Coral Gables and Florida Department of Law Enforcement Chief Executive Seminar Class # 37.

David Tedjeske is a United Educators approved investigator. He is the Director of Public Safety at Villanova University, having held that position since 2007. Dave has been working in campus law enforcement for the past 27 years. He formerly served as the Director of Public Safety at Clarion University of Pennsylvania, and prior to that was the Police Chief at Penn State Altoona. Dave began his career at Indiana University of Pennsylvania Police Department as a patrolman, before being promoted to investigator, and sergeant in charge of criminal investigations. Dave has a Bachelor’s and Master’s degree in Criminology from Indiana University of Pennsylvania.

David has been an active member of IACLEA for the past 18 years. He is currently the Chair of IACLEA’s Accreditation Commission and has served on the Commission since 2008. He is also Chair of the Standards Review and Interpretation Committee and led the effort to re-write IACLEA’s Accreditation Standards Manual in 2012. Dave also chaired IACLEA’s Arming Working Group in 2013-



2014, providing data and guidance to Departments undergoing the transition from an unarmed to an armed Department. Dave also co-chaired the Technology Committee and helped develop a white paper on CCTV on college campuses. He has also written several articles for the Campus Law Enforcement Journal on topics including accreditation, employee retention, and detainee processing.

David currently serves as a project consultant for D. Stafford & Associates, a highly reputable consulting firm specializing in delivering on organizational, physical security, vulnerability and arming assessments; Clery Act compliance audits; assessments of Title IX compliance and a host of other services related to security, safety and compliance for institutions of higher education. He has served in this role since 2014.

GMU RFP: Section XII. B. Specific Requirements
2. Qualifications and Experience

d. Sample reporting.

SEE DOCUMENT LABELED APPENDIX #1

DSA has provided a Sample Report format.



SPECIFIC REQUIREMENTS

GMU RFP: Section XII. B. Specific Requirements

3. Specific Plan (Methodology)

a. Your approach to providing the services described herein.

b. What, when and how services will be performed.

DSA Approach and Process for Managing Investigations

(Note: these processes can be adjusted to meet the requirements of the client institution)

1. Clients typically contact Dolores Stafford when an investigation is requested and she gathers specific information from the client about the complaint, including a brief overview of misconduct being alleged; the number of complainants, respondents and witnesses that will need to be interviewed; and other pertinent details that will assist DSA in understanding the size and scope of the request for services.
2. DSA will generate and send a scope of services to the client, which outlines costs as well as the estimated time that DSA believes will be required to complete the fact-finding process and generate the investigative report.
3. DSA will confirm whether the client institution would prefer an on-site investigation, a virtual investigation or a hybrid model.
4. After the scope is approved, DSA will send an agreement to the client which will be executed to engage DSA to conduct the investigation and the scope of services becomes an appendix to the agreement.
5. Once the agreement is executed, the DSA Vice President, Equity Compliance and Civil Rights Services will assign an investigator or investigative team to the complaint and will work with the client to determine dates for the work.
6. If the investigation is an on-site or hybrid investigation, the DSA Vice President, Equity Compliance and Civil Rights Services will coordinate housing accommodations for the DSA investigators at/near the client member's institution. She will also coordinate the ground transportation to and from the airport/train station to the hotel and from the hotel to and from the institution. NOTE: The investigators typically book their own flights or train tickets, if they are not able to drive to the client institution.
7. The DSA Vice President, Equity Compliance and Civil Rights Services will examine all material evidence submitted and follow up with the client member to ensure all relevant evidence that is available has been provided (to include the identification of relevant witnesses). Material evidence usually includes police reports, residence life staff reports, documentation from the Title IX Coordinator, copies of text messages, cell phone call logs,



social media posts, written statements, and pictures. There are times when the client member will also include medical and disciplinary records, sketches, or videos. Information that the client elects not to upload into the secure platform can be mailed via U.S. Mail or provided in-person when the investigator(s) arrive on-site. Every effort should be made by the client to provide as much material evidence ahead of the scheduled date of the on-site interviews as possible so the investigative team can become acquainted with the complaint and prepare their investigative strategy before arrival.

8. The DSA Vice President, Equity Compliance and Civil Rights Services will confirm the dates for the investigative team to initiate the interviews and if it is an on-site or hybrid investigation, will verify that the investigators have necessary flights, lodging and transportation and will provide the required information to the client prior to the team's arrival.
9. The DSA Vice President, Equity Compliance and Civil Rights Services will serve as a liaison to the client for purposes of scheduling the interviews will instruct the client on the preferred order of interviews and estimated time needed to conduct each interview so the client can schedule accordingly with all parties.
10. The client will set up all of the interviews,
 - a. if the investigator(s) will be on-site, will procure a safe and private interview space, and ensure notice has been provided to the parties in compliance with the requirements of the Clery Act. (DSA does not recommend that the client member plan for the DSA team to conduct interviews in the police department, President's conference room, or student conduct office. Preferred locations include comfortable spaces with a large table/chairs, easy access to water and restrooms, and away from high- traffic areas of the institution).
 - b. if the investigation is virtual, the DSA Vice President, Equity Compliance and Civil Rights Services will provide a zoom link to the client institution that can be provided to each person being interviewed.
11. No less than two calendar days prior to the start of the investigation, the client institution will be required to submit the final interview schedule to the DSA Vice President, Equity Compliance and Civil Rights Services. If the investigator(s) will be on-site, the client will also provide the room name or number, building name, and physical address of the interview location and the time and location for the team to report to campus.
12. Prior to the start of the interviews, the DSA Vice President, Equity Compliance and Civil Rights Services or the investigative team will meet with the client member representative and receive an update on any relevant case details that have recently transpired. The investigative team will then begin their fact-finding into the allegation.
13. Once the interviews and fact finding have been completed, the investigative team will debrief with the client representative or small group to provide a general overview of the fact-finding process and to request any additional information they may need from the client



representatives. The investigators will not provide findings during the debrief meeting, as they often need to review evidence, statements and institutional procedures prior to providing any guidance regarding the findings or determination of responsibility.

14. The investigators will quickly begin to write the investigative report.
15. Once the investigators have completed their draft of the investigative report (usually within two weeks following the final interview and receipt of all evidence), they will forward the report to the DSA Vice President, Equity Compliance and Civil Rights Services, who will review the draft report to ensure all relevant facts have been captured and explained as thoroughly as possible. The DSA Vice President, Equity Compliance and Civil Rights Services also provides an off-site, nonbiased read of the investigation. The DSA Vice President, Equity Compliance and Civil Rights Services will coordinate with the investigative team to generate the final draft report and send it to the client for review.
16. The DSA Vice President, Equity Compliance and Civil Rights Services will schedule a call with the client member to address any questions regarding the investigative report. Once the draft report is accepted by the client, the client will receive a Final Report. The contract will then be closed and the client billed for services rendered.

c. Do you provide an electronic hub and ability to comply with use of electronic data?

DSA does not provide an electronic hub and typically uses the system provided by each client institution to share electronic data to ensure it is in compliance with the institution's policies and procedures.

d. What is the timeframe for responding to our request(s) for service?

DSA typically works within the timeframes set by the client institutions. That said, a DSA team can typically initiate an investigation within 7-10 days from the receipt of a signed agreement.

e. Can you provide a statement of your commitment to diversity and inclusion?

D. Stafford and Associates is committed to treating its clients and its members ethically and with dignity. We recognize that one's lived experience, particularly of those who have been minoritized, impact one's trust in policies and processes. To that end, D. Stafford & Associates' policies training, and investigations are conducted in a fair and impartial manner.



SPECIFIC REQUIREMENTS

GMU RFP: Section XII. B. Specific Requirements

4. References

4. References: No fewer than three (3) that demonstrates the Offeror's qualifications, preferably from other comparable higher education institutions your company is/has provided services with and that are similar in size and scope to that which has been described herein. Include a contact name, contact title, phone number, and email for each reference and indicate the length of service.

Client Name: Virginia Commonwealth University
Contact: Jacqueline Kniska, Title IX Coordinator
Phone: 804-828-2336
Email: jkniska@vcu.edu
Date of Engagement: 2014 and 2015
Scope: Title IX Investigation

Client Name: University of Virginia at Wise
Contact: Tabitha Smith (Associate Vice Chancellor for Diversity, Equity & Inclusion and Title IX Coordinator)
Phone: 276-870-2710
Email: tsh5d@uvawise.edu
Date of Engagement: 2016 to Present
Scope: Title IX Investigations, Policy Review and Various Training Programs

Client Name: American University
Contact: Stephen Vaughan (Title IX Coordinator)
Phone: 202-839-2749
Email: titleix@american.edu
Date of Engagement: 2019-2021
Scope: Numerous Title IX Investigations

Client Name: Wilmington University
Contact: Nicole Romano, Sr. Director of HR & Title Coordinator
Phone: 302-356-6846
Email: nicole.romano@wilmu.edu
Date of Engagement: 2017 to Present (Maintains DSA on Retainer)
Scope: Conducted Numerous Title IX/VII Investigations, Policy Review and Annual Training Programs



SPECIFIC REQUIREMENTS

GMU RFP: Section XII. B. Specific Requirements

5. Proposed Pricing

5. Proposed Pricing: Provide hourly rates for all services described herein. Also see XI above

XI. COST OF SERVICES: This will be a fixed price contract. Total amount shall include all fees and expenses including travel. The proposed pricing should reflect a breakdown of hourly rates by position level and estimated number of hours for each phase of the project. Any investigative case should include a SOW that assumes an appearance at a hearing.

The hourly rates for the DSA investigative services:

- Single investigator fee: \$375 per hour
- Two person team: \$450 per hour

If a larger team is required based on the size and complexity of an investigation, the cost would be an additional \$75.00 per hour for additional investigators beyond two, i.e. the hourly rate if there were four investigators assigned to a particular case would be \$600.00.

RFP Section X. B.-- Ordering Procedure: Once a requirement arises Mason will contact one, or more, of the vendors awarded a contract and request at Scope of Work (SOW) for that particular engagement. Contractors will provide the SOW with pricing and any particulars specific to the SOW to the requestor.

GMU will be requesting an SOW from vendors, and for each engagement, DSA will use the hourly rate listed above and the estimates outlined under travel expenses to provide GMU with an estimated cost based on the estimated number of hours to complete the work for each SOW.

Travel Expenses:

It is not feasible to increase the hourly fee to accurately cover the travel expenses, thus if GMU does not want to pay the actual travel expenses for on-site investigations, DSA would estimate \$1,000 per investigator to cover airfare, train or mileage, ground transportation, airport parking, and baggage. Finally, the hotel costs would be difficult to estimate, as some investigations will take 1-2 days and others may take 4-5 days, thus if GMU does not want to pay the actual hotel room expenses for on-site investigations, DSA will estimate \$175/night for each investigator to cover room, taxes and fees.



SPECIFIC REQUIREMENTS

GMU RFP: Section XII. B. Specific Requirements

6. Additional Questions

a. Are you and/or your subcontractor currently involved in litigation with any party?

In late 2021, DSA was named, along with Collin College, in litigation involving two police officers who were terminated by Collin College. DSA previously conducted an Organizational Assessment of the Police Department and was named in the litigation. Bennight and Mark v. Collin College, et al.

b. Please list any investigation or action from any state, local, federal or other regulatory body (OSHA, IRS, DOL, etc.) related to your firm or any subcontractor in the last three years.

None

c. Please list all lawsuits that involved your firm or any subcontractor in the last three years.

Response to #1 is the only lawsuit DSA has ever been named as a party.

d. In the past ten years has your firm's name changed? If so please provide the reason.

No

RFP Section IV: FINAL CONTRACT

ATTACHMENT B to this solicitation is Mason's standard two-party contract. It is the intent of this solicitation to base the final contractual documents off of Mason's standard two-party contract and Mason's General Terms and Conditions. Any exceptions to our standard contract and General Terms and Conditions should be denoted in your RFP response. Other documents may be incorporated into the final contract, either by way of attachment or by reference, but in all cases this contract document and Mason's General Terms and Conditions shall jointly take precedence over all other documents and will govern the terms and conditions of the contract.

EXCEPTION REQUESTED:

AA. INSURANCE: 4. An umbrella/excess policy in an amount not less than **one million dollars (\$1,000,000)** to apply over and above Commercial General Liability, Employer's Liability, Workers' Compensation, and Commercial Automobile Liability Insurance.



FACTS ABOUT D. STAFFORD & ASSOCIATES

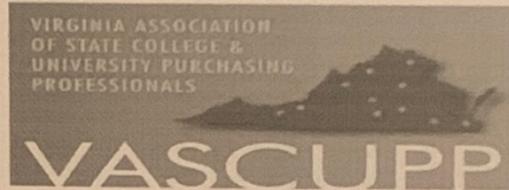
- D. Stafford & Associates (DSA) has been providing consulting services to colleges and universities since 1997.
- DSA is an EVA registered vendor. Account #: VC0000157881
- DSA is a Virginia Department of Small Business and Supplier Diversity (DSBSD) certified vendor. SWaM Certification #: 723606 (expires 3-6-25)
- DSA is a registered limited liability company (LLC) in Delaware.
- State of Delaware Certified Woman Owned Business (Woman Business Enterprise)
- DSA is registered through the Federal Government as:
 - Woman Owned Business
 - Women Owned Small Business
- DSA maintains professional liability insurance through The Hartford Insurance Company.
- DSA maintains additional insurance coverage through Sentinel Insurance Company, LTD, including:
 - General Liability at \$1,000,000 each occurrence/\$2,000,000 aggregate
 - Personal Injury at \$1,000,000
 - Auto Insurance at \$1,000,000
 - Umbrella Policy at \$1,000,000

Upon acceptance of a proposal, DSA will provide:

- Employer Identification Number
- A Certificate of Insurance, upon request



Purchasing Department
 4400 University Drive, Mailstop 3C5
 Fairfax, VA 22030
 Voice: 703.993.2580 | Fax: 703.993.2589
<http://fiscal.gmu.edu/purchasing/>



REQUEST FOR PROPOSALS
GMU-1790-22

ISSUE DATE: January 14, 2022

TITLE: Title VII & IX and ADA Investigation/Consultation Services

PRIMARY PROCUREMENT OFFICER: James F. Russell, Director, jrussell@gmu.edu

SECONDARY PROCUREMENT OFFICER: Erin Rauch, Asst Director, erauch@gmu.edu

QUESTIONS/INQUIRIES: E-mail all inquiries to both Procurement Officers listed above, no later than 2:00 PM Eastern Time (ET) on , January 25, 2022. All questions must be submitted in writing. Responses to questions will be posted on the Mason Purchasing Website by 2:00 PM ET on February 1, 2022. Note: Questions must be submitted in WORD format. Also see section III. COMMUNICATION, herein.

PROPOSAL DUE DATE AND TIME: February 16, 2021 @ 2:00 PM ET. SEE SECTION XII.A.1 FOR DETAILS ON ELECTRONIC PROPOSAL SUBMISSION.

In Compliance With This Request For Proposal And To All The Conditions Imposed Therein And Hereby Incorporated By Reference, The Undersigned Offers And Agrees To Furnish The Goods/Services In Accordance With The Attached Signed Proposal Or As Mutually Agreed Upon By Subsequent Negotiations.

Name and Address of Firm:

Legal Name: D Stafford and Associates, LLC **Date:** 2-14-22

DBA: DSA

Address: 179 Rehoboth Avenue # 1121
Rehoboth Beach, DE 19971

FEI/FIN No. 27-0594131 **Name:** DORIS A. STAFFORD

Fax No. N/A **Title:** President / CEO

Email: dloves@dstaffordandassociates.com **Telephone No.** 202-438-5929

SWaM Certified: Yes: No: (See Section VII. SWaM CERTIFICATION for complete details).

SWaM Certification Number: 723606

This public body does not discriminate against faith-based organizations in accordance with the *Governing Rules, § 36* or against a Bidder/Offeror because of race, religion, color, sex, national origin, age, disability, or any other prohibited by state law relating to discrimination in employment.

ATTACHMENT A
SMALL BUSINESS SUBCONTRACTING PLAN
TO BE COMPLETED BY OFFEROR

Offerors must advise any portion of this contract that will be subcontracted. It is the goal of the Commonwealth that over 42% of its purchases be made from small businesses. All potential offerors are required to include this document with their proposal in order to be considered responsive.

Small Business: "Small business (including micro)" means a business which holds a certification as such by the Virginia Department of Small Business and Supplier Diversity (DSBSD) on the due date and time for proposals. This shall also include DSBSD certified women- owned and minority-owned businesses and businesses with DSBSD service disabled veteran owned status when they also hold a DSBSD certification as a small business on the proposal due date. Currently, DSBSD offers small business certification and micro business designation to firms that qualify.

Certification applications are available through DSBSD online at www.SBBSD.virginia.gov (Customer Service).

Offeror Name: D Stafford and Associates, LLC

Preparer Name: Dorees Stafford Date: 2/14/22

Who will be doing the work: I plan to use subcontractors I plan to complete all work

Instructions

- A. If you are certified by the DSBSD as a micro/small business, complete Section A of this form.
- B. If the "I plan to use subcontractors" box is checked, complete Section B of this form. For the proposal to be considered and the offeror to be declared responsive, the offeror shall identify the portions of the contract that will be subcontracted to any subcontractor, to include DSBSD certified small business for the initial contract period in relation to the offeror's total price for the initial contract period in Section B.

Section A

If your firm is certified by the DSBSD provide your certification number and the date of certification.

Certification Number: 723606 Certification Date: 3-6-20

Section B

If the "I plan to use subcontractors" box is checked, populate the requested information below, per subcontractor to show your firm's plans for utilization of any subcontractor, to include DSBSD-certified small businesses, in the performance of this contract for the initial contract period in relation to the offeror's total price for the initial contract period. Certified small businesses include but are not limited to DSBSD-certified women-owned and minority-owned businesses and businesses with DSBSD service disabled veteran-owned status that have also received the DSBSD small business certification. Include plans to utilize small businesses as part of joint ventures, partnerships, subcontractors, suppliers, etc. It is important to note that these proposed participation will be incorporated into the subsequent contract and will be a requirement of the contract. Failure to obtain the proposed participation dollar value or percentages may result in breach of the contract.

Plans for Utilization of Any subcontractor, to include DSBSD-Certified Small Businesses, for this Procurement

Subcontract #1

Company Name: _____ SBSD Cert #: _____
Contact Name: _____ SBSD Certification: _____
Contact Phone: _____ Contact Email: _____
Value % or \$ (Initial Term): _____ Contact Address: _____
Description of Work: _____

Subcontract #2

Company Name: _____ SBSD Cert #: _____
Contact Name: _____ SBSD Certification: _____
Contact Phone: _____ Contact Email: _____
Value % or \$ (Initial Term): _____ Contact Address: _____
Description of Work: _____



GMU APPENDIX #1

Case: 20200812 ML/JT

Final Report of Investigation

**Ann Todd and Cathy Cocks,
D. Stafford & Associates**

Reviewed by: Adrienne Murray, DSA Associate

April 6, 2020

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Scope and Methodology

Scope

On February 25, 2020, the ABC University (hereinafter “ABC” or “University”) began an investigation into a report that the Respondent violated the ABC Student Conduct Code.¹ Specifically, per the notice letter is it alleged that:

“On or about August 26, 2019, the Respondent engaged in nonconsensual sexual touching with the Complainant in the Smith Residence Hall...”

Policy

ABC’s Title IX Policy (hereinafter “Policy”) prohibits Discriminatory Harassment, Sexual Harassment, Sexual Assault and all other forms of sexual violence, Dating Violence, Domestic Violence, and Stalking. This Policy applies to all members of the ABC community (all students, faculty and staff) as well as to individuals not directly affiliated with ABC (e.g., contractors, vendors, and visitors). The Policy likewise applies to online behavior and social media that may affect the educational or employment experience. The full policy may be found at www.abc.edu/titleixpolicy.

The specific definitions to this allegation are as follows:

***Sexual Assault:** Sexual Assault is any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent. Sexual Assault may include any of the following:...*

***Consent:** Sexual activity requires consent, which is defined for purposes of this Policy as clear, unambiguous, and voluntary agreement between the participants to engage in specific sexual activity....*

The standard of evidence used to determine responsibility is...

Notice Timeline

Feb. 22, 2020: Complainant completes and signs *Title IX Complaint*

Feb. 25, 2020: *Notice of Allegations and Title IX Rights and Responsibilities* sent to both parties

Feb. 28, 2020: *Title IX Communication: Interview Date* sent to parties

Mar. 12, 2020: *Notice of Allegation (Amended)* sent to both parties

Mar. 20, 2020: Investigators complete *Preliminary Report of Investigation*

Mar. 20, 2020: *Title IX Communication: Preliminary Report Complete; Invitation to Review* sent to both parties.

Methodology

DSA Associates Ann Todd and Cathy Cocks (hereinafter “Investigators”) were assigned to conduct the investigation. Todd is the Director of Compliance Activities and Senior Investigator for DSA and a licensed attorney (NC Bar #25717) and private investigator in North Carolina. Cocks is an Associate for DSA and higher education professional specializing in investigating and assessing behavioral matters.

Todd and Cocks are trained on issues related to domestic violence, dating violence, sexual assault, and stalking and how to conduct an investigation that protects the safety of all parties and promotes accountability as required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, as amended by the Violence Against Women Reauthorization Act of 2013. They have also received training on the definition of sexual harassment, how to conduct an investigation, including issues of relevance, and how to serve impartially, including avoiding prejudgment of the facts at issue, conflicts of interest and bias, all as required by Title IX of the Education Amendments of 1972 (Title IX).

The Investigators did not know or have had previous contact with the Complainants or Respondent, prior to conducting the investigation and have no known conflict of interest or bias for or against either party. Both parties were given the opportunity to request an alternative Investigator and declined to do so as outlined per the policy.

The Investigators were on-site March 11-12, 2020. While at ABC, the Investigators toured Smith Residential Hall and the Dining Hall.

The Investigators conducted the interviews in a secure workspace on campus and all evidence collected was in the exclusive possession of the Investigators until submitted with the report. The interviews were scheduled to provide for safety and privacy for all participants. Follow up interviews following the on-site visit were conducted using a secure pro account on the Zoom video conferencing platform.

Interviews were recorded when possible to aid the Investigators in report-writing. The interviews were summarized, rather than a full transcription, to improve information sharing. Recordings are maintained by the University for three years.

In addition to the interviews, the Investigators reviewed school policies and evidence provided by the University and the parties. Information pertinent to the investigation is incorporated into the body of the report or included as part of the attached exhibits.

No one interfered with or attempted to influence the work of the Investigators or this report. The timely assistance and cooperation of all parties has led to an investigative process that has produced a fair, objective, and comprehensive report that fairly summarizes relevant evidence.

Persons Interviewed

- John Doe (hereinafter “Complainant”) - ABC student. (3/5/20)
- Jane Roe (hereinafter “Respondent”) - ABC student. (3/17/20)
- Ray Johnson (hereinafter “Student Witness 1”) – ABC student. (3/6/20)
- Randall Jones—Resident Director, Smith Residence Hall (3/5/20)

Persons Not Interviewed

- Lou Knight (hereinafter “Witness 2”) - Friend of the Complainant. (Did not respond to multiple outreach attempts from Title IX office via email and voicemail)

Questions Submitted by Parties

Neither party submitted questions.

Documents Received and Referenced

- **Exhibit A:** Text messages to Complainant from Witness 1, 8/25/19 (provided by the Complainant)
- **Exhibit B:** Card swipe access for Complainant and Respondent 8/25/19-8/26/19 (provided by ABC)
- **Exhibit C:** Video still and Analysis of video from Smith Residence Dining Hall, 8/26/19 (provided by ABC)
Full video available in Title IX.
- **Exhibit E:** Floor plan information for Smith Hall (ABC website)

The Investigators also reviewed the following:

- **Notice Documents:** Notice documents provided to the Complainant and the Respondent (provided by ABC and referenced above)
- **Images of Respondent Family:** The Respondent provided images to document dates she was off-campus for family vacation. The Investigators reviewed the images but for privacy purpose have not included here. *Images are available for inspection in the Title IX office..*

Information Regarding the Final Report of Investigation

According to the process at ABC, both parties are given the opportunity to review the *Preliminary Report of Investigation*, which includes all evidence obtained that is directly related to the allegations. The parties are then given ten (10) day to submit a written response to the University. This *Final Report of Investigation* incorporates and/or edit the report based on the written response of the parties following the review period.

The Investigators edited/added the following for this *Final Report of Investigation*:

- Added this section, “Information Regarding the Final Report...”
- Added the parties’ comments as an exhibit, added the section, “Investigator’s Comments to Written Response from the Parties,” and made corrections as outlined in the above section.
- Added the section, “Summary of Relevant Evidence”
- Removed line numbering

Investigators’ Comments to Written Response from the Parties

Both parties received an opportunity to review the *Preliminary Report of Investigation (hereinafter “PRI”)*. The Complainant did not submit a written response to the Preliminary Report. ABC received the Respondent’s submitted written response on March 23, 2020. The Respondent’s response is included...

According to the Policy, “the Investigator has the discretion to determine what evidence is directly related to the allegation and the degree to which evidence is relevant.” The policy excludes evidence about the complainant’s sexual predisposition or prior sexual behavior unless offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the evidence concerns the respondent and is offered to prove consent.

- **PRI line 330** - The Investigators have edited the report to state that the Respondent left a friend’s room, rather than the common room before going to the party.

- **PRI line 530** – The Investigators agree that the witness’ statement was opinion but decline to make any change.

Summary of Relevant Evidence

Case Summary

The summary is based on the interview statements and all available exhibits and notice documents. The primary bullets attempt to capture distinct events and/or facts. The secondary bullets provide additional context and or disputed accounts. Unless otherwise indicated, the information is from interview statements.

Quoted items are written as provided and therefore, grammatical and typographical errors were not corrected.

- Complainant is a first-year student at ABC and lives in Smith Residence Hall on the 3rd floor.
- The Respondent is first-year student at ABC and lives in Smith Residence Hall on the 4th floor.
- The Complainant and the Respondent met during orientation.
 - The Respondent stated that they met through mutual friends.
 - The Complainant stated that they met when the Respondent came up to his group of friends and invited them to party with beer in the woods behind the baseball field.
 - In a text message to Witness 1, the Complainant texted at 11:43pm, “yo jus invited to a party PERIOD” (Exhibit A).
 - Witness 1 stated that...

Timeline

The timeline is based on card swipe information, video, and interview statements.

Date	Time	Action	Source
8/25	≈9:30pm	Complainant leaves for party	Complainant's statement
8/25	≈9:45pm	Complainant returns	Complainant's statement
8/26	1:22am	Complainant accesses Smith	Exhibit B: Card Swipe..
8/26	1:57am	Complainant at dining hall	Appendix C: Security...

Evidence Obtained

Interview Summaries

Complainant

The Complainant is an ABC student. She was accompanied to the meeting by a support person. (Interviewed 3/5/20).

At the beginning of the interview, the Investigators discussed the role of the advisor, as outlined in the *Title IX Advisor* brochure.⁵ The Investigators also confirmed that the Complainant received the *Title IX Rights and Responsibilities* document.⁶

The Complainant is a first-year student living in Smith Residence Hall. He rushed a fraternity, Alpha Beta, in the spring semester. He is also a member of the football team; he is the kicker and mostly was a scrimmage player this year. Because of football, he arrived on campus early, moving in to the residence hall of August 8. . . .

Witness 1

Witness 1 is an ABC student. He is roommates with the Complainant and a member of the football team. (Interviewed 3/6/20).

The Complainant is a first-year student living in Smith Residence Hall. He rushed a fraternity, Alpha Beta, in the spring semester. He is also a member of the football team; he is the kicker and mostly was a scrimmage player this year. Because of football, he arrived on campus early, moving in to the residence hall of August 8. . . .

Exhibits

Exhibit A: Text messages to Complainant from Witness 1, 8/25/19 (provided by the Complainant).