



HIGHER EDUCATION

# 2020 Title IX Regulations: Basic Compliance Training

July 28, 2020

Presented by Amy Kosanovich Dickerson



FRANCZEK

# Meet Your Host

Amy Kosanovich Dickerson

- Partner, Franczek P.C., Chicago
- Focus on education law
- Relevant Experience: Trainings, Consultation on Title IX investigations, determinations and appeals; internal investigations; OCR complaints; lawsuits

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# In the Zoom Chat

What is your name and title?



# Ground Rules



The background of the slide features several black silhouettes of human hands raised in the air, set against a light blue gradient background. The hands are positioned at various heights and angles, creating a sense of collective participation or inquiry.

# Ask Questions



# Participate!

Try to stay  
focused





# Keep it hypothetical



This isn't legal  
advice



# Why Are We Here?



# Know the Rules

SEXUAL HARASSMENT  
complaint form



## THE HILL

New Title IX regulations give expanded rights to those accused of sexual assault on campus |...



## IHE Inside Higher Ed

New Title IX regulation sets location-based boundaries for sexual harassment...



## FOX NEWS

Department of Education releases new Title IX regulations

A close-up, high-resolution photograph of a human eye, showing the iris, pupil, and eyelashes. The eye is looking directly forward. The image is slightly desaturated, giving it a serious and focused appearance. Overlaid on the center of the eye is the text "Recognize Title IX Sexual Harassment and Related Misconduct" in a bold, white, sans-serif font.

# **Recognize Title IX Sexual Harassment and Related Misconduct**



But not just any action, the right action for  
the conduct at issue!



Why is this so  
important?

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1 in 5 women experiences attempted or completed sexual assault in college

20% of women and 10% of men are sexually assaulted in college

62% of women and 61% of men experience sexual harassment during college

21-38% of college students experience staff-perpetrated and 39-64.5% experience student-perpetrated sexual harassment

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According to a 2017 report from the Justice Department, only

23 percent

of all sexual assaults are reported to the police.

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*Harassment  
and assault can have  
long lasting,  
detrimental effects on  
victims (Trauma)*

# Effects on Individuals

Poor performance in school

Stress

Disengagement

Fear

Distraction

Anger

Mistrust

Conflict

Lost Opportunities

Acting out

Absenteeism

Drop-out

Suicide

ANXIETY

PTSD

DEPRESSION

# Effects on Teams

Decreased focus

Lost productivity

Withdrawal

Neglect

Absenteeism

Malingering

*Lack of trust in leadership*

**Turnover**



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*Unfair processes can  
have  
long lasting,  
detrimental effects on  
the accused*

# Mattress Protest and Its Aftermath

Case of alleged rape at Columbia first yielded much sympathy for the accuser and protest, but ends with the university apologizing to the accused. The case has had an impact on the discussion of sexual assault on campus.

By [Jeremy Bauer-Wolf](#) // July 24, 2017



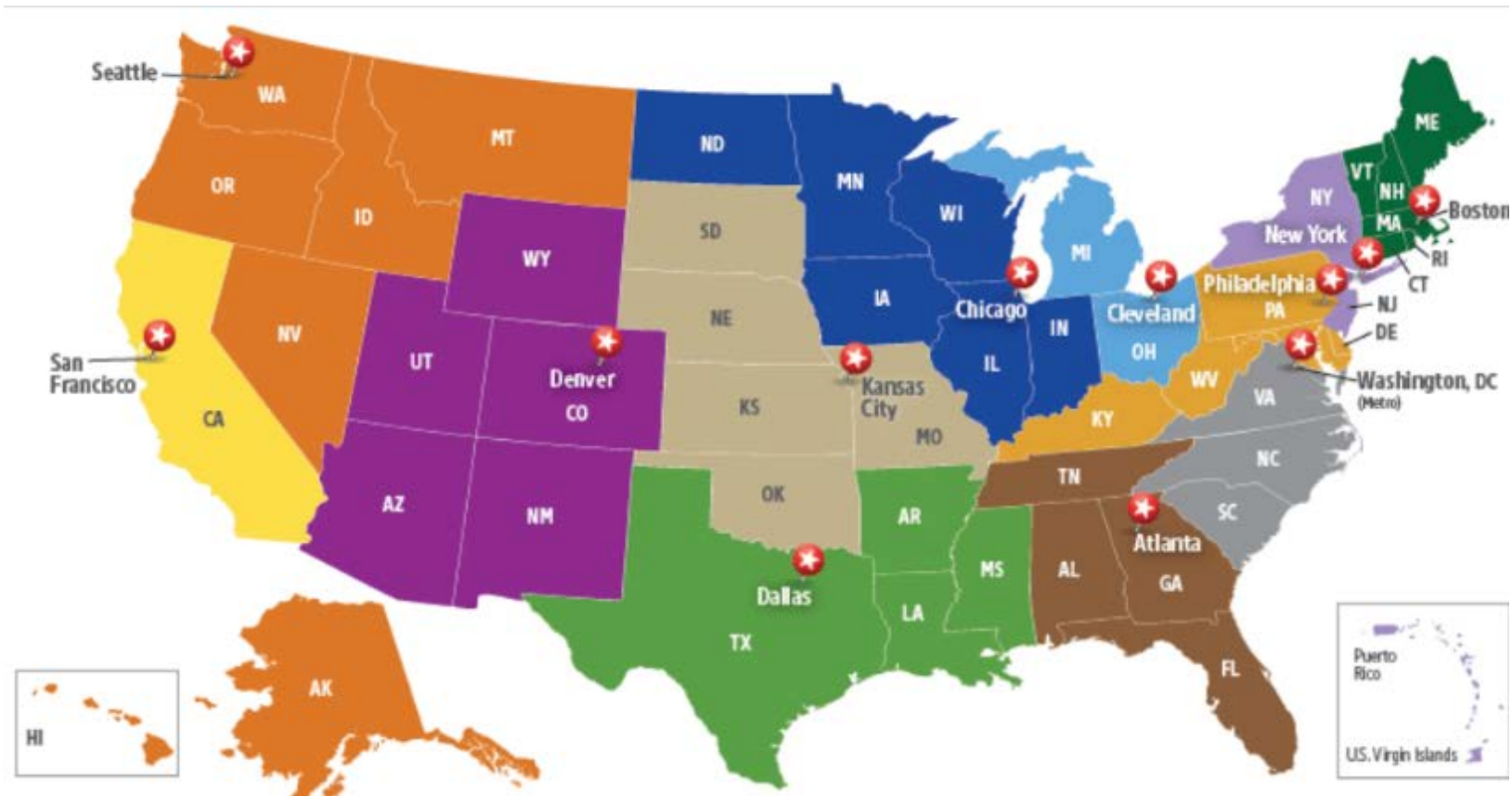


# Harassment Is Illegal

*Including Sexual Harassment*



# ED Office for Civil Rights (OCR)





You could be responsible.



It's the  
right  
thing to  
do.



# Ice Breaker



# Thumbs Up or Down

Have you been directly involved in a Title IX complaint during your time at the Institution?

# In the Zoom Chat

What is the most important question you would like answered today?



# What is Title IX?





# Title IX

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# What falls under Title IX?

Recruitment,  
Admissions, and  
Counseling

Financial  
Assistance

Athletics

Sex-Based  
Harassment

Treatment of  
Pregnant &  
Parenting Students

Discipline

Single-Sex  
Education

Employment

Retaliation

# Title IX Statute

(20 U.S.C. §§ 1681–1688)

"No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

# Title IX Regulations

(34 C.F.R. Part 106 – Amended as of 8/14/2020)

- Prohibit discrimination on the basis of sex
- Establish procedural requirements
  - Policy
  - Detailed Grievance procedure
  - Designation of Title IX coordinator(s)
  - Many many requirements



# Other Applicable Laws



## Employment

- State human rights acts
- Title IX
- Clery Act/Violence Against Women Act

## Students

- State human rights acts
- State law?
- Title IX
- Clery Act/Violence Against Women Act

# How Does Clery/VAWA Relate to Title IX?

- Contains policy and procedural requirements for addressing complaints of domestic violence, dating violence, sexual assault, and stalking
  - Timely warnings, emergency notifications
  - Requirements following a report
  - Broader AND narrower than Title IX
- ASR and other reporting
- Prevention requirements

# What Does VAWA Require?

- Specific requirements for policies and procedures, including:
  - Description of disciplinary proceedings
  - Steps, anticipated timelines, and decision-making process
  - How to file a complaint
  - Standard of evidence
  - List of all possible sanctions and description of protective measures
  - Prompt, fair and impartial process
  - Conducted by individuals who receive annual training
  - Advisor of choice
  - Various written notification requirements, including:
    - Written notification about options for accommodations and protective measures
    - Simultaneous notification to parties of certain results

# Required Programming Under VAWA

- Primary prevention and awareness programs for all incoming students and new employees
- Ongoing prevention and awareness campaigns for students and employees
- Range of topics, including definitions of prohibited conduct, resolution procedures, possible sanctions and protective measures, and available resources and options





# When Must the Institution Respond to Sexual Harassment?



# It Depends Who [Well, Which Law] You Ask

## Employment

- State Human Rights Act
- Title VII
- Title IX
- Clery Act/Violence Against Women Act

## Students

- State Human Rights Act
- Other state law?
- Title IX
- Clery Act/Violence Against Women Act

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# **When must a school respond to Title IX sexual harassment?**

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A recipient with actual knowledge of [Title IX] sexual harassment in an education program or activity against a person in the United States must respond promptly and in a manner that is not deliberately indifferent.

# Notice

ACTUAL knowledge

To Title IX  
Coordinator or  
"official with  
authority"





# **Title IX Actual Knowledge**

1. Sense
2. Report

# Reporting Sexual Harassment: Who, How and When?

- Any person may report sex discrimination, regardless of whether the person is the alleged victim of the reported conduct
- Reports can be made by mail, by telephone, or by email, using the contact information listed for the Title IX Coordinator
- Or by any means that results in the Title IX Coordinator receiving the person's report
- Such a report may be made at any time, including during non business hours, by using the telephone number or electronic mail address, or by mail to the office address listed for the Title IX Coordinator

# Official with Authority



- Title IX Coordinator
- Any other officials who have been given authority to institute corrective measures on behalf of the recipient

# Straight Talk

Who are “Officials With Authority” Here?



# What about VAWA/Clery Act?

- CSA = “campus security authority”
  - Special designation under Clery Act
  - Designed to facilitate crime reporting in annual report
- WHO?
  - Anyone with responsibility for campus security
  - Anyone to whom crimes can be reported
  - Anyone with “significant responsibility for student and campus activities” (housing, discipline)
  - Excludes pastoral/professional counselors
- CSA *may* be considered an “official with authority” under Title IX such that notice to that person constitutes actual knowledge

# Key Roles in Responding to Reports

- Medical providers
- Law enforcement
- Community/outside agencies

# Involvement of Law Enforcement

- Complainant has the option to involve law enforcement, including:
  - Notifying law enforcement, including on-campus and local police
  - Request assistance from campus authorities
  - Decline to notify law enforcement or campus authorities
- Orders of protection, no contact orders, restraining orders



# What is Sexual Harassment?



# It Depends Who [Well, Which Law] You Ask

## Employment

- State human rights acts
- Title VII
- Title IX
- Clery/VAWA

## Students

- State human rights acts
- Other state law?
- Title IX
- Clery/VAWA



# Title IX Sexual Harassment

- Employee quid pro quo
- Hostile environment (newly defined)
- Clery/VAWA "Big 4"

QUID  
PRO  
QUO

# Quid Pro Quo

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Quid = Something

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Pro = For

---

Quo = Something



# Title IX Quid Pro Quo

**Definition:** An employee of the recipient conditioning an aid, service, or benefit of the recipient on an individual's participation in unwelcome sexual conduct

**New:** Only an employee (not a volunteer, another student, etc.)

**Codified:** Severity and harm presumed

# Clery/VAWA

Sexual Assault 20 U.S.C. 1092(f)(6)(A)(v)

Domestic Violence 34 U.S.C. 12291(a)(8)

Dating Violence 34 U.S.C. 12291(a)(10)

Stalking 34 U.S.C. 12291(a)(30)



# Title IX Hostile Environment

# Title IX – What is Sexual Harassment?

## Old Definition

Unwelcome conduct determined by a reasonable person to be **severe, pervasive or persistent as to interfere with or limit a student's ability to participate in or benefit from school services, activities, or opportunities**

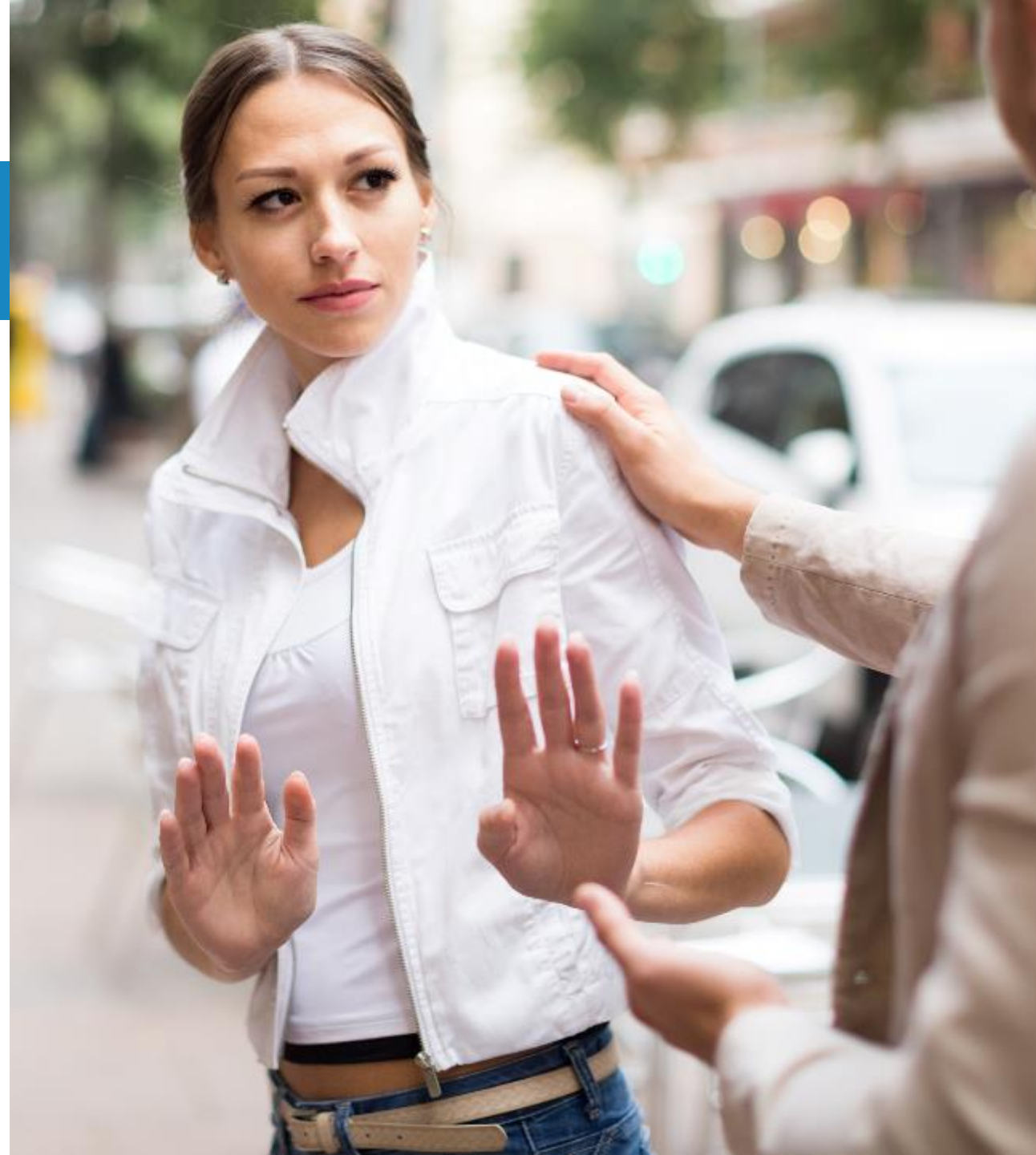
## New Definition (8/14)

Unwelcome conduct determined by a reasonable person to be **so severe, pervasive, and objectively offensive that it effectively denies a person's equal access to the recipient's education program or activity**

# Unwelcome Conduct

- Not **Consent**
- Not **Participation**
- Not **Silence**
- Age Matters
- Intoxication Matters
- Culture Matters
- Ability Matters

\*\*reasonable person



# Unwelcome vs. Consent

- Consent under State law
- Consent under your Institution's policy
- Role of drugs and alcohol on ability to consent



- Severe, pervasive, and objectively offensive
- Constellation of surrounding circumstances, expectations, and relationships

**ACCESS DENIED**



# Hostile Environment Factors

Context, Nature, Scope, Frequency,  
Duration, and Location of the Incidents

Identity, Number, Ages, and  
Relationships of the Persons involved

# What about.... casual or isolated comments or conduct?



# Thumbs Up or Down

Is this severe, pervasive, and objectively  
offensive?

# Is this TIX Sexual Harassment?



**Male students photographed themselves outside the student center holding a sign that read "We Love School Sluts"**



**A report circulated among athletic teams ranked freshman women by how drunk you would have to be to hook up with them**



**A female professor repeatedly tells a male student how good he looks after losing weight**



**Male students held a "march" chanting "No means yes; yes means anal."**

# Is this TIX Sexual Harassment?



**A professor tells a student he will give her a good grade if she gives him a backrub alone in his office after class**



**A female student attempts to grab another student's breasts during a soccer game**



**A student sends another student multiple notes calling her a slur used for lesbians, mocking her for having "boy" hair.**



**A student sends a naked picture to her boyfriend. What if he makes a webpage and shares it with other students?**



# Title IX Sexual Harassment Must Be “In a Program or Activity”

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**Program or Activity:** Any location, events, or circumstance over which the recipient exhibits substantial control over both the alleged harasser and the “context” in which the harassment occurred

# Online & Off Campus

Substantial control over the context?

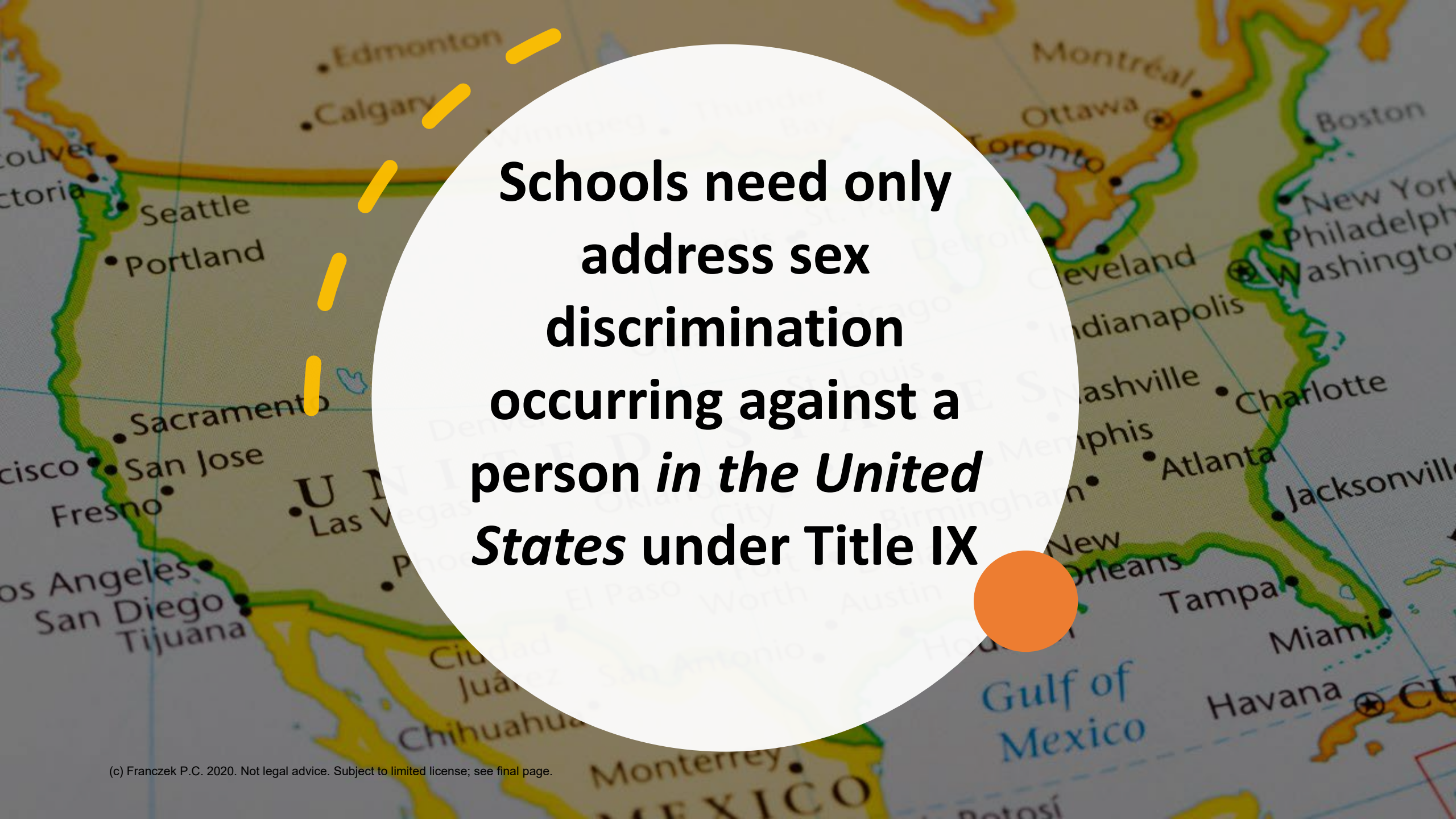




# Compare to Clery

- Clery geography
  - On campus (slightly different reporting requirements for on campus housing)
  - Public property within or immediately adjacent to campus
  - In or on non-campus buildings or property that your college owns or controls

<https://www.campussafetymagazine.com/clery/clery-act-geography-definitions-clery-map-examples/>

A map of the United States is shown in the background, with various cities labeled. A large white circle is overlaid on the map, containing the text. The circle is decorated with several yellow dashed lines on its left side and a solid orange circle on its bottom right edge. The text inside the circle reads: "Schools need only address sex discrimination occurring against a person *in the United States* under Title IX".

**Schools need only  
address sex  
discrimination  
occurring against a  
person *in the United  
States* under Title IX**



# TIX DISMISSALS

## **Mandatory if conduct alleged:**

- Not sexual harassment if true
- Did not occur in the school's program or activity
- Did not occur in the United states

## **Permissive if:**

- Complainant requests to withdraw in writing
- Respondent's enrollment or employment ends
- Specific circumstances prevent recipient from gathering evidence sufficient to reach a determine (e.g., passage of time, lack of cooperation by complainant)

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**\*\*can still address under non-Title IX policy**

# Policies on Harassment

- Sexual Harassment and Sexual Violence Policy
- Title IX Grievance Procedure
- Code of Conduct
- Employee Handbooks etc.

Title IX Policy

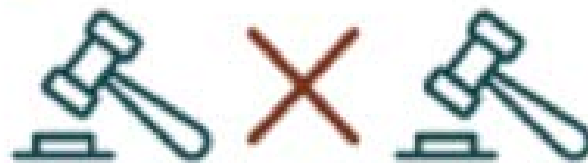
Other Policies

BUT ALWAYS  
consider  
whether  
another non-  
"sexual  
harassment"  
policy or  
procedure  
applies

Conduct that, if true, would be  
"Title IX Sexual Harassment"  
the conduct did not occur,  
consider whether any other policy  
should be used (double  
jeopardy?)

Dismissal under Title IX Process  
OR  
Conduct that, even if true, would  
not "Title IX Sexual Harassment"

# DOUBLE JEOPARDY



an individual can **NOT**  
be tried twice for the  
same crime.

# Straight Talk

Hypothetical

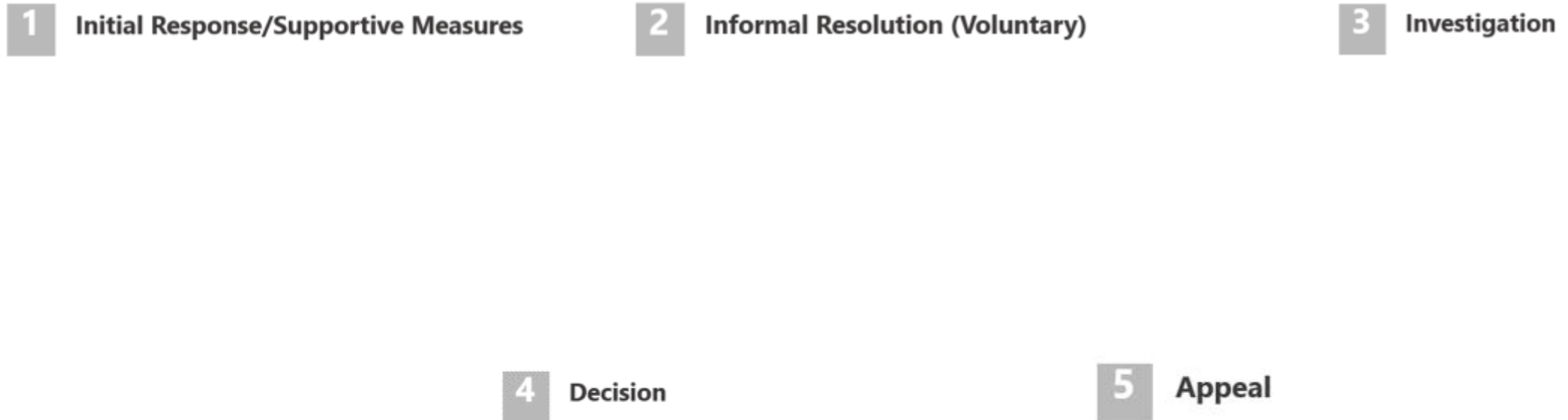


# How Must the Institution Respond?





# Adequate Response




**1**

# **Initial Response/Supportive Measures**

# Title IX Coordinator

- Must meet with alleged victims of sexual harassment (the Title IX Complainant) covered by the new Title IX regulations (can delegate)

Apply to parties in both *reports* and *Formal Complaints* of sexual harassment



*Title IX Complainant*: A person who is alleged to be the victim of conduct that could constitute sexual harassment

**NOT a third party who reports Title IX Sexual Harassment perpetrated against someone else**

**NOT the Title IX Coordinator, even if the TIXC "signs" a Formal Complaint**



*Title IX Respondent*: A person who has been reported to be the perpetrator of conduct that could constitute sexual harassment

# Terminology

## Title IX Coordinator must promptly, **even if no Formal Complaint is filed:**

- Contact the Title IX Complainant to discuss the availability of “supportive measures”
- Consider the Title IX Complainant’s wishes with respect to supportive measures
- Inform the Title IX Complainant of the availability of supportive measures with or without the filing of a formal complaint
- Explain the process for filing a Formal Complaint

***New:***  
**Initial**  
**Response**

# Formal Complaint

Defined as a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegation of sexual harassment. 34 C.F.R. § 106.30(a).



# Signing a Complaint

Factors to consider

# Supportive Measures

## What Changed?

### OLD TERM (OCR Guidance)

- Used terms such as “interim measures” or “interim steps” to describe measures to help a complainant maintain equal educational access
- Implied only available during pendency of investigation, did not mandate offering them, not clear if could be punitive or disciplinary, and did not clarify if available to respondents

### NEW TERM (Final Rule)

- **Non-punitive**, individualized services, offered as appropriate and without charge to a complainant or a respondent before or after the filing of a formal complaint, or where no complaint has been filed (34. C.F.R.106.30(a)).
- **Should be designed to restore or preserve equal access to the education program or activity without “unreasonably” burdening the other party**





# Examples of Supportive Measures

- Counseling
- Course modifications
- Schedule changes
- Increased monitoring or supervision

A supportive measure that completely removes a respondent from an activity would likely be considered punitive, except for "emergency removals" for students and "administrative leaves" for employees

# Clery Act Accommodations vs. Supportive Measures

- Complainant/victim must receive notification of existing and available options for available assistance in and how to request changes to:
  - Academic, living, transportation, and working situations
  - Protective measures
  - Legal and advocacy assistance
  - Visa and immigration resources

# Emergency Removal/ Admin Leave

## Immediate emergency removal

(34 C.F.R. 106.44(c))

- Based on an individualized safety and risk analysis
- Necessary to protect a student or other individual from **immediate threat** to **physical health or safety**
- **Notice, opportunity to challenge** provided "immediately" provided the removal
- **Consider other laws, e.g., SB100,**  
"change in placement" under IDEA

## Employee administrative leave

(34 C.F.R. 106.44(d))

- Not prohibited
- Consider state law, board policy, handbooks, and bargaining agreements

# Confidentiality

- Not required to maintain anonymity of Complainant after formal complaint is filed
- Both parties must be identified (if identity is known) in written notice of allegations
- Using party initials or withholding Complainant's identity is insufficient

# 2

## **Informal Resolution (Voluntary)**

# Informal Resolution

## INFORMAL RESOLUTION IS NOT PERMITTED UNDER THE FOLLOWING CONDITIONS:

- Cannot condition enrollment, employment, or any right on waiver of right to investigation and adjudication of formal complaints under grievance procedure
- Cannot require use of informal resolution process
- Cannot offer informal resolution process until formal complaint is filed
- Not available to resolve allegations that employee sexually harassed a student

## INFORMAL RESOLUTION MAY MOVE FORWARD UNDER THE FOLLOWING CONDITIONS:

- Any time prior to reaching a determination, either party may request informal resolution
- Requires voluntary, written consent from both parties
- Any party has a right to withdraw prior to agreement



# Informal Resolution Facilitators

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- We do not recommend using the Title IX Coordinator or investigator(s) or decisionmakers (complaint and appeal)



## Written Notice: Required

- To both parties
- In writing
- Allegations
- Requirements of informal resolution process (including circumstances under which the party cannot resume a formal complaint arising from the allegations)
- Resulting consequences of participating (e.g., records)



**3**

# **Investigation**

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*New:*  
Formal  
Complaint  
Response

34 C.F.R. 106.45(b)

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- Requires a number of specific steps for investigating, dismissing, and determining responsibility in formal complaint
- Major shift from previous, more deferential stance toward specific policies and practices for complaint resolution

# ANATOMY OF AN INVESTIGATION

Written notice to the parties

Choosing an investigator

Required elements of an investigation

- Written notice to known parties “upon receipt of written complaint”
- In sufficient time to allow respondent to prepare a response before any **initial** interview
- Must include:
  - Notice of grievance process, including any informal resolution process
  - Notice of allegations, in sufficient detail to allow respondent to prepare a response (names of known parties, conduct alleged, date and location of conduct, if known)

**More  
Steps:  
Written  
Notice**

- Must include:
  - Statement that respondent presumed not responsible and that responsibility determined at conclusion of grievance process
  - Notice of parties' rights to have an attorney or non-attorney advisor and to inspect and review evidence
  - Notice of any provision in the code of conduct that prohibits knowingly making false statements or providing false evidence during the grievance process
- Must be supplemented if new allegations opened for investigation

**More  
Steps:  
Written  
Notice**



# Written Notice: Required

- Informal resolution notice
- Notice at start of investigation
- Dismissal notice
- Interview notices
- Report
- Written determination and notice of appeal rights



- Document information to complainant at initial meeting, including supportive measures requested/provided
- Document that review of evidence provided to both parties

## Written Notice: Recommended



# Who should investigate?

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- Can be the Title IX Coordinator
- But should it?



# Who should investigate?

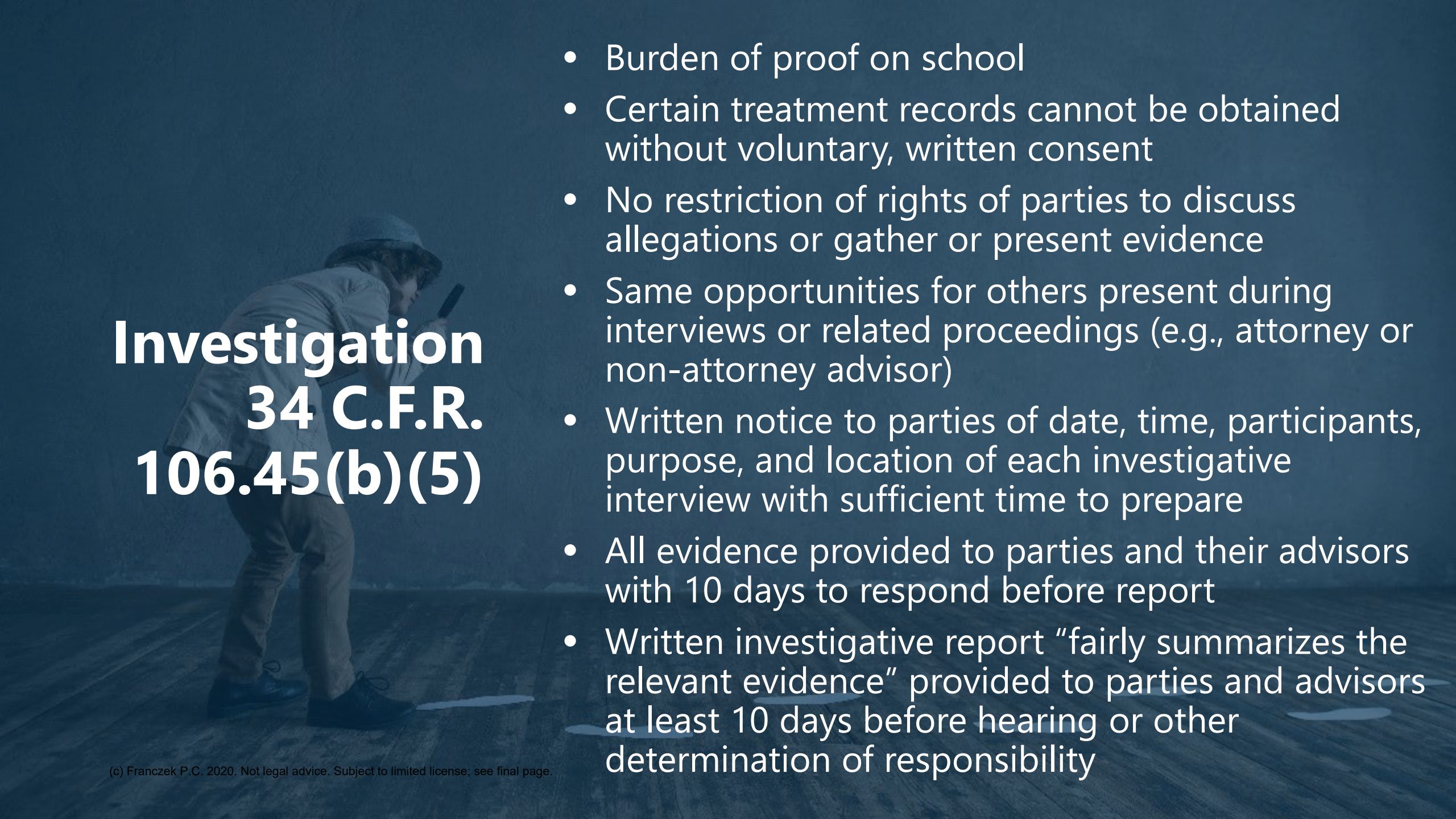
- Trained, unbiased investigator
  - No actual or perceived conflict of interest
  - Check “institutional interests”
  - Presumption that Respondent is not responsible

# Who should investigate?

- No “one size fits all” approach
- May need to designate
- Consider the perception of bias
  - Your friendship or other relationship with the accused or their family
  - Your sex/gender identity
  - Your personal conflicts (even if just perceived)
  - Personality conflicts

A woman with long dark hair, wearing a red sweater, is sitting at a desk. She is looking at a laptop screen with a thoughtful expression, her hand resting on her face. The desk has a laptop, a smartphone, and some potted plants. The background is slightly blurred, showing a window and some indoor plants.

# Contents of an Investigation

A person wearing a white lab coat and a white cap is leaning over, looking at a smartphone in their hand. They are standing on a wooden floor. The background is a dark, textured wall.

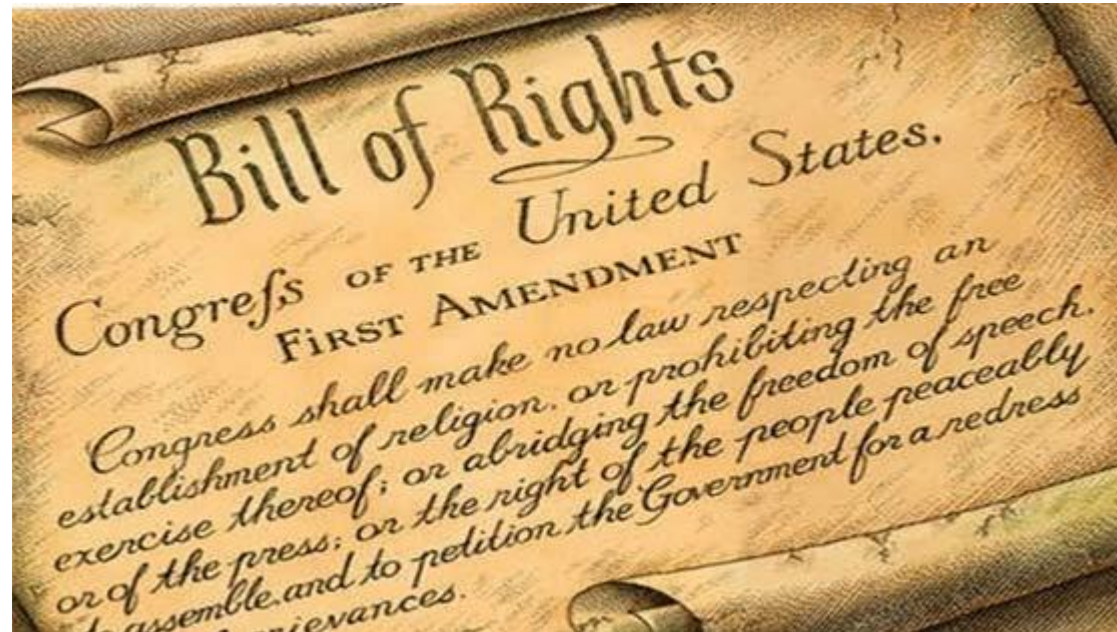
# Investigation 34 C.F.R. 106.45(b)(5)

- Burden of proof on school
- Certain treatment records cannot be obtained without voluntary, written consent
- No restriction of rights of parties to discuss allegations or gather or present evidence
- Same opportunities for others present during interviews or related proceedings (e.g., attorney or non-attorney advisor)
- Written notice to parties of date, time, participants, purpose, and location of each investigative interview with sufficient time to prepare
- All evidence provided to parties and their advisors with 10 days to respond before report
- Written investigative report “fairly summarizes the relevant evidence” provided to parties and advisors at least 10 days before hearing or other determination of responsibility

# Notice to Parties in Interviews

- What to expect about future contact (timing, updates, encourage follow-up to you)
- Written copy of policies/procedures
- Notify of retaliation rights – provide specific examples
- No “Gag” order but can warn of retaliation risks

# First Amendment Rights



# Warning! Medical Records

- Notice of allegations should not divulge either party's medical information
- Prohibited from accessing or using medical, psychological, or similar records in grievance process without a party's (or parent's) voluntary, written consent

# Opportunity to Review Evidence

- Before the investigatory report is completed, evidence relating to the allegations must be sent to each party and advisor and should include all evidence (including that which the school does not intend to rely upon and exculpatory and inculpatory evidence)
- Parties have 10 days to provide a written response



# Investigation Report Writing

- Fairly summarizes the relevant evidence
- Provide the report to the parties and their advisors, if any, for their review and written response, at least 10 days before a hearing or other determination of responsibility

# Investigation Report Should Include

Applicable policies and  
procedures

Timeline of investigation

Description of allegations

Unbiased summary of evidence  
gathered, including interviews

Credibility determination(s)

**4**

# **Decision**



## **Decisionmaker(s) (Complaint)**

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- Cannot be the Title IX Coordinator or the investigator(s)

Determinations  
of  
Responsibility  
34 C.F.R.  
106.45(b)(6)

- Live hearing required
- Live cross by party advisors required

# Live Hearing

A group of business professionals are seated around a large conference table in a modern office setting. They are dressed in business attire and appear to be in the middle of a meeting. Several laptops are open on the table, and some individuals are looking at their screens while others are looking towards the center of the table. The background features large windows with a grid pattern, suggesting a high-rise office building.

# Live Hearings

- Questioning
- Cross-examination
- Advisor(s)
- Virtual hearings

# Relevance

- Cross-Examination
- Provide reasoning for irrelevance
- Consider all relevant evidence
- Exceptions



# Relevance

- Rape shield laws
- Treatment records
- Legally privileged information
- Improper inference
- Prior statements

# Rulings on Relevance in “Cross”

- Provide reasoning for irrelevance
- Admit and consider all relevant evidence
- Exceptions
  - Sexual behavior (except in limited situations)
  - Legal privilege
  - Treatment records

A woman with long dark hair in a ponytail, wearing a red and black plaid shirt, is sitting at a wooden desk. She is looking down at a typewriter on the desk with her hand resting on her chin, appearing thoughtful. On the desk, there is a typewriter and a vase of purple and pink flowers. The background is a bright window with sheer curtains. A green wooden chair is visible behind her.

# Live Hearing Technology



# The Decision

# Written Determination

Identify	Identify the allegations
Describe	Describe procedural steps taken
Cite	Cite potential policy violations
Summarize	Fairly summarize all relevant evidence
Provide	Provide statement of result, with rationale, for each allegation
Appeal	Appeal procedures

# **Factual Findings**

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Separate findings for each alleged policy violation

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Focus on material facts (i.e., those that affect outcome)

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Can describe undisputed and disputed facts separately

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For any facts in dispute, show your work and reasoning



**Remember the  
Standard of  
Proof**

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**Preponderance  
of the Evidence  
vs.  
Clear and  
Convincing  
Evidence**

# Remedies

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- Disciplinary action against perpetrator
- Counseling for perpetrator/victim
- Changes to services or policies
- Remedies for complainant and others
- Etc.!!



**5**

**Appeal**

# Appeal Process

- Available to both parties
- Three bases for appeal
- Notify party of appeal in writing
- Apply procedures equally for both parties
- Opportunity to submit written statement
- Issue written decision to both parties



# Decisionmaker(s) (Appeal)

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Cannot be the Title IX  
Coordinator or the  
investigator(s) or the  
decisionmaker (complaint)



# **Bias, Conflicts of Interest, and Other Fairness Concerns**



# Bias & Conflict of Interest

The Title IX Coordinator, investigator, decision-maker, or informal resolution facilitator must not have a conflict of interest or bias for or against Complainants or Respondents generally or for or against any individual Complainant or Respondent. And that they not prejudge any matter before them.

# 5 Min Guided Breakout

What steps can you take to avoid:

*Prejudgment*

*Conflict of Interest*

*Bias*



# Recordkeeping



# Recordkeeping

Must maintain the following for 7 years:

- Sexual harassment investigation documents, including:
  - Determination regarding responsibility
  - Recordings or transcripts of live hearing
  - Disciplinary sanctions imposed on Respondent
  - Remedies provided to Complainant
- Appeal and result
- Informal resolution and result
- Actions taken in response to a report of sexual harassment
- Actions taken in response to a formal complaint of sexual harassment



# Recordkeeping

Responses to formal and informal complaints and actions taken in response should include:

- The basis for the recipient's conclusion that its response was not deliberately indifferent
- Documentation that it has taken measures designed to restore or preserve equal access to the recipient's education program or activity
- Supportive measures or if no supportive measures are provided, document the reasons why such a response was not clearly unreasonable in light of the known circumstances



# Programming



# Title IX Programming

- “Officials with Authority” on identifying sexual harassment and reporting
- Other employees, non-employees (recommended)
- Students on rights (recommended)

# Clery/VAWA Programming

- Primary prevention and awareness programs for all incoming students and new employees
- Ongoing prevention and awareness campaigns for students and employees
- Range of topics, including definitions of prohibited conduct, resolution procedures, possible sanctions and protective measures, and available resources and options

# Questions



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