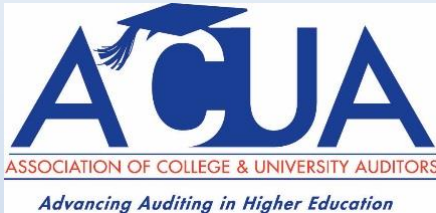


Auditing for Title IX Compliance

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Webinar Moderator



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Today's Presenter



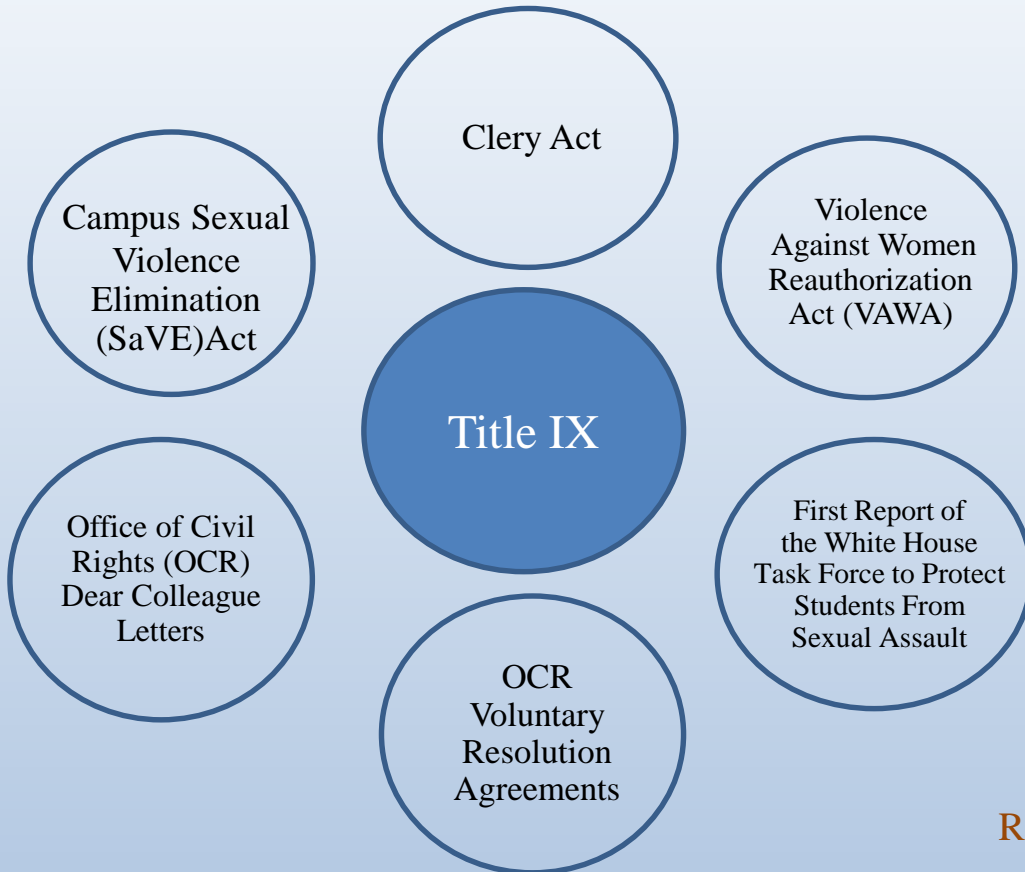
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Presentation Objectives

- ❖ Provide an overview of the key requirements of Title IX, and other related regulations and guidance.
- ❖ Review key elements which should be included in university Title IX policies and procedures.
 - ❖ Suggest a framework to assess the adequacy of the university's Title IX policies and procedures.
- ❖ Review tools and resources available to facilitate the planning and performance of a Title IX compliance audit.

Title IX Related Regulations & Guidance



Title IX of the Education Amendments of 1972

- ❖ “No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient which receives Federal financial assistance.”
- ❖ Requires that recipient designate at least one employee to coordinate its responsibilities to comply with and carry out its responsibilities under the law [e.g., **Title IX Coordinator**]. The recipient shall notify all of its students and employees of the name, office address and telephone number of the responsible employee.
- ❖ Requires recipients to adopt and publish grievance procedures providing for **prompt and equitable resolution** of complaints alleging any action that would be prohibited by Title IX.
- ❖ The Office of Civil Rights (OCR) within the U.S. Department of Education (ED) is responsible for enforcing Title IX.

Polling Question #1

Does your university/college have a dedicated Title IX Coordinator?

- 1) Yes
- 2) No
- 3) We have a Title IX Coordinator, but the individual in this role has additional non-Title IX Compliance responsibilities
- 4) I don't know

From Gender Equity to Sexual Assault

- ❖ From 1972 until almost 2000, much of the focus of Title IX on college campuses was fairness in athletic programming.
- ❖ In March 1997 the Office of Civil Rights issued sexual harassment guidance (and revised guidance in January 2001) which re-emphasized Title IX focus on preventing and remedying sexual harassment in schools to ensure a safe environment in which students can learn.
- ❖ In April 4, 2011 the Office of Civil Rights issued a Dear Colleague Letter addressing student sexual harassment, including sexual violence in schools and universities.

2011 Dear Colleague Letter

- ❖ Provided guidance to colleges and universities regarding their responsibilities under Title IX pertaining to sexual harassment, clarifying that it includes acts of sexual violence that **create a hostile environment** and interfere with students' right to receive an education free from discrimination.
- ❖ Defined sexual violence as physical sexual acts perpetrated against a person's will or where a person is **incapable of giving consent** due to the victim's use of drugs or alcohol.
- ❖ Re-emphasized 2001 guidance which stated that sexual harassment of a student creates a hostile environment if the conduct is sufficiently serious that it interferes with or limits a student's ability to participate in or benefit from the recipient's program or activity.
- ❖ A single or isolated incident of sexual harassment may, if sufficiently severe, create a hostile environment.

2013 Dear Colleague Letter

- ❖ Stated that **retaliation** (intimidation, threats, coercion, or discrimination) against individuals who complain formally or informally in a college about any potential civil rights violations including sexual discrimination is a violation of federal civil rights laws.
- ❖ Sets expectation that colleges and universities have appropriate policies and procedures in place which prohibit retaliation and provide outreach to the campus community to train and communicate these prohibitions to students and employees.

The Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics (Clery Act)

- ❖ In 1990, Congress enacted the Crime Awareness and Campus Security Act of 1990 requiring all schools that receive Federal financial assistance (Title IV) to maintain and publish crime statistics and security information. The act was amended several times, including in 1998 when it was renamed the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in memory of a student who was murdered in her dorm room in 1986.
- ❖ The Clery Act requires that schools maintain a crime log, have procedures for timely warning notifications, and **develop policies, procedures, and programs that address sexual assault.**
- ❖ The Clery Act specifically mandates that “each institution shall develop and distribute procedures for **simultaneously notifying the accuser and accused** of the outcome of institutional disciplinary proceedings.”

VAWA and SaVE Acts

- ❖ In March 2013, President Obama signed the Violence Against Women Reauthorization Act (VAWA) which included a provision specifically pertaining to colleges and universities [the Campus Sexual Violence (SaVE) Act].
- ❖ The Campus SaVE Act requires that incidents of **domestic violence**, **dating violence**, **sexual assault**, and **stalking** be added as separate categories to already existing Clery Reporting classifications.
- ❖ While the 2011 Title IX Dear Colleague Letter Guidance recommended schools provide educational programs on sexual violence, the Campus SaVE Act requires them. Colleges must provide “primary prevention and awareness programs” for new students and employees, as well as ongoing prevention and awareness campaigns. These educational programs must include certain subjects:
 - ❖ *A statement by the school that it prohibits acts of sexual violence.*
 - ❖ *Education on **bystander education**.*
 - ❖ *Risk reduction programs so students recognize and can avoid abusive behaviors or potential attacks.*
 - ❖ *Information on the school’s reporting system and disciplinary procedures.*

Other Guidance

- ❖ In April 2014, The White House Task Force to Protect Students from Sexual Assault issued its first report entitled “Not Alone” which provides “best practices” for reducing sexual violence on campuses, developing a comprehensive sexual misconduct policy, investigation and adjudication protocols, and training.
- ❖ Voluntary Resolution Agreements (VRA) are generally public documents entered into between OCR and a college or university against which a Title IX complaint was filed. These agreements provide insight into how OCR interprets and implements Title IX. In the 2013 University of Montana VRA, OCR stated that “this agreement will serve as a blueprint for colleges and universities throughout the country to protect students from sexual harassment and assault.”
- ❖ State enacted sexual assault legislation (e.g., NYS – Enough is Enough).

Polling Question #2

Has your state enacted regulations to address sexual assault on college campuses?

- 1) Yes
- 2) No
- 3) I don't know
- 4) There are proposed regulations which have not yet been enacted

University of Montana

Voluntary Resolution Agreement

- ❖ Agreed to retain a consultant with expertise in the area of sex-based harassment prevention and training in higher education to:
 - ❖ *Evaluate and recommend revisions to the university's policies and procedures for preventing, investigating and remediating sex-based harassment.*
 - ❖ *Develop and provide mandatory Title IX training for all students, university staff and faculty.*
 - ❖ *Develop an annual climate survey.*
- ❖ Develop and institute a system for tracking and reviewing reports, investigations, interim measures and resolutions of student and employee conduct that may constitute sex-based harassment.
- ❖ Ensure that the educational environment of each enrolled student who reported sexual harassment is free of harassment and take steps to eliminate hostile environment.
- ❖ Expanded the expectations and responsibilities regarding retaliation and suggests that a school must take proactive and ongoing steps to prevent it.
- ❖ Expanded the definition of responsible employee to require all employees, except those who are statutorily barred from reporting, to report sexual harassment to the Title IX Coordinator.

Recent Voluntary Resolution Agreements

- ❖ Frostburg State University (September 6, 2016) – Provided OCR with a signed Resolution Agreement in which it agreed to:
 - ❖ *Publish an anti-harassment statement, which explicitly states that the university does not tolerate sex discrimination, including sexual harassment, sexual assault, and sexual violence and that retaliation against individuals who file complaints is prohibited.*
 - ❖ *Revise its Title IX grievance procedures as necessary so that they provide for **prompt and equitable** resolution of complaints of sexual harassment, including sexual violence.*
 - ❖ *Ensure that the responsibilities of the Title IX Coordinator and any Deputy Coordinators are consistent with Title IX.*
 - ❖ *Provide training to ensure that all members of the university community are trained regularly on issues related to sexual harassment and on the requirements of Title IX.*
 - ❖ *Enhance its outreach to and feedback from students, including the performance of an **annual climate check**.*

Recent Voluntary Resolution Agreements

- ❖ Wesley College (September 30, 2016) – Provided OCR with a signed Resolution Agreement in which it agreed to:
 - ❖ *Make revisions to its Title IX grievance procedures to ensure consistency among its various Title IX policies and procedures, compliance with Title IX requirements, and to clearly identify the individual responsible for investigating and resolving Title IX complaints.*
 - ❖ *Ensure that notice is provided to students and employees of the existence of revised policies and procedures, and that they are widely distributed.*
 - ❖ *Review and revise the responsibilities of the Title IX Coordinator and any Deputy Coordinators to ensure that they are consistent with Title IX. Based on the Title IX Coordinators' responsibilities, the college will develop a description of corresponding mandatory training requirements.*
 - ❖ *Provide relevant Title IX training to all staff responsible for recognizing and reporting incidents of sexual harassment, board hearing panel members, and students.*
 - ❖ *The college will conduct a **climate check** with students to assess the steps and measures taken by the College to achieve its goal of a campus free of sexual misconduct.*

Polling Question #3

Has your university/college conducted a campus climate survey?

- 1) Yes
- 2) No
- 3) We are in the process of developing one, but have not yet implemented it
- 4) I don't know

Title IX Resources/Guidance

- ❖ Not Alone – The First Report of the White House Task Force to Protect Students from Sexual Assault [www.notalone.gov/assets/report.pdf]
 - ❖ *A Checklist for a Sexual Misconduct Policy* [*No longer available on Department of Justice website but available at: www.nccpsafety.org/resources/library/checklist-for-campus-sexual-misconduct-policies/*]
 - ❖ *Know Your IX – Campus Policy Guide* [www.knowyourix.org/campus-policy-guide]
 - ❖ *A Sample Reporting and Confidentiality Protocol*
 - ❖ *Role of Title IX Coordinator*
 - ❖ *Guidelines for Conducting a Climate Survey*
- ❖ United States Department of Education Office for Civil Rights Questions and Answers on Title IX and Sexual Violence [www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf]
- ❖ United States Department of Education Office for Civil Rights Title IX Resource Guide [<http://www2.ed.gov/about/offices/list/ocr/docs/dcl-title-ix-coordinators-guide-201504.pdf>]
- ❖ Higher Education Compliance Alliance – Sexual Misconduct (has links to statutes, regulations, Dear Colleague Letters and other resources) [www.higheredcompliance.org/resources/sexual-misconduct.html]
 - ❖ *Effective Implementation of the Institutional Response to Sexual Misconduct Under Title IX and Related Guidance (including summary of University of Montana Resolution Agreement)* [www.higheredcompliance.org/resources/resources/05D_13-06-38.pdf]

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy?

The following checklist highlights elements that are particularly important for institutions to consider when drafting sexual misconduct policies:

1. Introduction

- ❖ Clear statement of school's prohibition against sex discrimination, which includes sexual misconduct.
- ❖ Statement of the school's commitment to address sexual misconduct.

2. Scope of the Policy

- ❖ Identify persons, conduct locations (including off-campus, if sexual violence occurred in the context of a school activity or educational program) programs and activities
- ❖ Clearly state the policy applies to all students and employees, regardless of sexual orientation or gender identity and explain the policy applies to third parties.
- ❖ Briefly explain the school's confidentiality policy (generally 3 classes)
 - ❖ *Individuals who are licensed counselors/pastoral counselors are not obligated to report any information to anyone.*
 - ❖ *People who commonly advocate for survivors (i.e., health center and women's center staff) are not obligated to report complainant's experiences must submit non-identifying information about prevalence so campus responders are informed of the hostile environment that exists on campus.*
 - ❖ *Everyone else or "responsible employees" include all other faculty and staff members. They are obligated to report incidents of sexual harassment to the Title IX Coordinator even against the complainant's wishes.*

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

3. Options for Assistance Following an Incident of Sexual Misconduct

❖ Immediate Assistance

- ❖ *Identify and provide contact information for the trained on- and off- campus advocates and counselors who can provide and immediate confidential response in a crisis situation.*
- ❖ *Provide emergency numbers for on- and off- campus safety, law enforcement and other first responders (including the Title IX Coordinator).*
- ❖ *Describe the sexual assault response team process.*
- ❖ *Identify health care options both on- and off- campus including treatment for injuries, preserving evidence, obtaining a rape kit, and identifying locations for advocates who can accompany a victim to the hospital or health provider.*

❖ On-going Assistance

- ❖ *Identifying resources for on-going assistance on- and off-campus such as counseling, advocacy, and support.*
- ❖ *Describe immediate steps and **interim measures** that the school can provide to ensure the safety and well-being of the complainant (i.e., ability to move dorm, alter academic schedule, etc.)*

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

4. Identify the school's Title IX Coordinator and briefly explain the Title IX Coordinator's role in the school's overall response to sexual misconduct; provide references to sections of the policy that provide greater details regarding the Title IX Coordinator's duties. Examples of these duties might include:
 - ❖ Provides or facilitates ongoing training, consultation, and technical assistance on Title IX for all students, faculty, and staff.
 - ❖ Oversees the university's investigation and remediation of complaints of sexual misconduct:
 - ❖ *Determines whether complaints allege conduct that may, upon investigation, constitute prohibited sexual misconduct.*
 - ❖ *Monitors compliance with timeframes specified in the grievance procedures.*
 - ❖ *Monitors all complaints raising potential Title IX issues to ensure the university responded consistently with its Title IX policies and obligations.*
 - ❖ Regularly reviews university's policies and procedures to ensure that they comply with Title IX requirements.
 - ❖ Coordinates an annual climate survey.
 - ❖ Regularly reviews all complaints raising potential Title IX issues throughout the college to identify and address any patterns.

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

5. Definitions

- ❖ Clearly define all conduct prohibited by the policy, including:
 - i. Sexual harassment
 - ii. Hostile environment caused by sexual harassment
 - iii. Sexual assault
 - ❖ *Non-consensual sexual contact*
 - ❖ *Non-consensual sexual intercourse*
 - iv. Domestic violence
 - v. Dating violence
 - vi. Sexual exploitation
 - vii. Stalking
 - viii. Retaliation
 - ix. Intimidation

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

5. Definitions (continued)

❖ Additional terms that should be defined include:

- i. Consent – The input of students and sexual assault experts can be helpful in developing a definition of consent. At a minimum, the definition should recognize that:

❖ *Consent is a voluntary agreement to engage in sexual activity.*

❖ *Someone who is incapacitated cannot consent.*

❖ *Past consent does not imply future consent.*

❖ *Silence or an absence of resistance does not imply consent.*

❖ *Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.*

❖ *Consent can be withdrawn at any time.*

❖ *Coercion, force, or threat of either invalidates consent.*

- ii. Incapacitation (such as due to the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the student from having the capacity to give consent).

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

6. Reporting Policies and Protocols

- ❖ Identify formal reporting options – i.e., criminal complaint, institutional complaint, report to “responsible employee,” including the Title IX coordinator. Explain how each option works and include contact information for the people to whom one can make a report.
- ❖ Identify alternatives to reporting – i.e., privileged or confidential disclosures.
- ❖ Describe policies governing confidentiality.
- ❖ Explain the school’s reporting obligations under the Clery Act, including the annual reporting responsibilities of Campus Security Authorities and the school’s obligation to issue timely warnings.
- ❖ Explain the process for third-party and anonymous reporting.
- ❖ Ensure the policy prohibits retaliation against those who file a complaint or third-party report, or otherwise participate in the investigative and/or disciplinary process (i.e., as a witness), and explain that the school will take strong responsive action if retaliation occurs.
- ❖ Describe when the school will grant amnesty from drug, alcohol, and other student conduct policies. [e.g., **Good Samaritan Policy**].

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

7. Investigation Procedures and Protocols

- ❖ Identify the Title IX Coordinator(s) and explain roles and responsibilities.
- ❖ Specify a reasonably prompt time frame for conducting the investigation and resolving the complaint, as well as the process for extending the timeframe.
- ❖ Explain the processes for preserving evidence.
- ❖ Provide the respondent and complainant equitable rights during the investigative process.
- ❖ Explain that where necessary, the school will take immediate steps to protect complainants pending the final outcome of an investigation, including academic accommodations and other interim measures.

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

8. Grievance/Adjudication Procedures

- ❖ Explain the grievance/adjudication process, including:
 - ❖ *That mediation is never appropriate in sexual misconduct cases.*
 - ❖ *That the preponderance-of-the-evidence (i.e., more likely than not) standard will be used in any Title IX fact-finding and related proceedings, including any hearings.*
 - ❖ *The persons who may attend and/or participate in the adjudication process and the extent of that participation.*
- ❖ Outline the rights and roles of both parties in the adjudication process, including:
 - ❖ *Notice of hearing(s) to both parties.*
 - ❖ *An opportunity for both parties to present witnesses and other evidence.*
- ❖ Explain the possible results of the adjudication process, including:
 - ❖ *Sanctions, remedies, and accommodations for the complainant.*
- ❖ Outline how the parties will be informed of the results of the adjudication, including:
 - ❖ *Simultaneous written notice to both parties of the outcome of the complaint and the option to appeal, if applicable.*

Checklist for Sexual Misconduct Policy

What Should a Campus Consider Including in Its Sexual Misconduct Policy (continued)?

9. Prevention and Education

- ❖ Outline the school's approach to prevention, including type and frequency of prevention programming and education/outreach activities (i.e., Bystander Intervention Programs).

10. Training

- ❖ Outline how faculty and staff are trained and on what issues.
- ❖ At a minimum, the Title IX Coordinator(s), law enforcement, “responsible employees,” victim advocates, and anyone else who is involved in responding to, investigating, or adjudicating sexual misconduct must receive adequate training.

Polling Question #4

Does your university/college mandate Title IX Training for all students?

- 1) Yes
- 2) No
- 3) We have a mandatory Title IX orientation program for all incoming students, but not for returning students
- 4) I don't know

Title IX Requirements Comparison Template

Purpose: This document compares the university’s Title IX related policies and procedures to the key requirements and official guidance related to Title IX regulations. The information used to determine Title IX requirements/guidance was obtained from reviewing many sources of information including, Title IX of the Education Amendments of 1972, the Clery Act, Campus Sexual Violence Elimination (SaVE) Act, Violence Against Women Act (VAWA), Dear Colleague Letter(s), Not Alone, the First Report of the White House Task Force to Protect Students from Sexual Assault, Resources available on the Department of Education Website (including the Office of Civil Rights) and the National Association of College and University Attorneys website (including the University of Montana Resolution Agreement). Although some of the information that was reviewed detailed the specific regulations and requirements of these laws in relation to Title IX and related student sexual harassment and assault incidents, much of the information was guidance (and leading practices) advising how to interpret and implement procedures that comply with these regulations. In evaluating the adequacy of the university’s Title IX policies and procedures, internal audit determined whether these policies and procedures (P&Ps) included both the required elements and key aspects of Title IX guidance/leading practices.

Requirement/Guidance	University Title IX Related Policy #1	University Title IX Related Policy #2	University Annual Security & Fire Safety Report (Clery Act Requirement)	University Statement of Non-Discrimination (Title IX, Title VI and Section 504/Title II ADA)	Other Title IX university resources including training materials, websites, brochures, posters, etc.
Notice of Nondiscrimination <ul style="list-style-type: none"> No discrimination on basis of sex Refer Questions to Title IX Coordinator w/contact info 					

Title IX Requirements Training Template

Stakeholder	Type of Training	Frequency	Mandatory (Y/N)
Dean's Delegate Group/Department Chairs			
Faculty & Staff			
Adjunct Faculty			
New students (freshman/transfers)			
Resident Assistants (RAs)/ Orientation Assistants (OAs)			
Focused Student Groups (i.e., Greek Organizations, Athletics, Student Government, Student Ambulance)			
General Student population			
Campus Police Officers			
Conduct Officers			
Title IX Coordinator/Deputy Coordinators			

Title IX Audit Program

Audit Step	Key Title IX (and related) Regulations	Risks identified as being associated with the process	Program Steps
1	Disseminate a notice of nondiscrimination.	The lack of adequate Title IX policies and procedures could lead to legal proceeding brought against the university resulting in significant negative publicity and the potential withdrawal of federal funding.	Obtain a copy of the university's notice of nondiscrimination and ensure that it contains required information (i.e., does not discriminate on basis of sex, questions referred to Title IX coordinator with contact information) and is appropriately and widely distributed and available to the community.
2	Designate at least one employee to coordinate the university's efforts to comply with and carry out its responsibilities under Title IX.		Obtain an understanding of the role of the university's Title IX coordinator and Deputy coordinators and ensure that they are consist with Title IX requirements, formally documented, and communicated.
2a			Evaluate the adequacy and effectiveness of the procedures in place to support the Title IX coordinator(s) role(s) and responsibilities (i.e., communication of all complaints, assessment of Title IX applicability, monitoring of complaint adjudication for consistency).
3	Develop policies, procedures, and programs that address sexual assault (Clery Act).		Using the Title IX Requirements Comparison Template, evaluate the adequacy of the university's Title IX policies and procedures as compared to Title IX and related regulatory requirements and governmental guidance/best practices.
3a			Evaluate whether the university's Title IX policies and procedures are consistent (i.e., multiple policies, hardcopy vs. various websites containing Title IX information, student code of conduct), easy to understand, widely communicated and readily available.

Title IX Audit Program

Audit Step	Key Title IX (and related) Regulations	Risks identified as being associated with the process	Program Steps
4	Adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee sex discrimination complaints.	The lack of adequate Title IX policies and procedures could lead to legal proceeding brought against the university resulting in significant negative publicity and the potential withdrawal of federal funding.	Evaluate the adequacy of the university's Title IX definitions within the guidelines given by the Department of Education and other regulatory bodies. Evaluate the consistency of Title IX definitions and procedural information available to the community (i.e., on website, in policies, student code of conduct, etc.).
4a			Evaluate whether there are adequate procedures in place to ensure that employees are aware of reporting requirements (responsible employee) and to inform students of various reporting options, including to external law enforcement (criminal complaint), and privileged or confidential disclosures vs. responsible employees who must report.
4b			Evaluate the adequacy of the university's investigation procedures and protocols, whether they are consistent with the university's Title IX policies, and are working effectively.
4c			Evaluate the adequacy of the university's grievance adjudication procedures, whether they are consistent with the university's Title IX policies, and are working effectively.
5	Provide "primary prevention and awareness programs" for new students and employees, as well as ongoing prevention and awareness campaigns (SaVE Act).	The lack of adequate communication of Title IX policies and procedures could compromise student, faculty, and staff, safety.	Using the Title IX Training Summary, evaluate the adequacy of the university's Training and Prevention programs to educate faculty, staff, and students about the university's sexual misconduct policies and procedures. In addition, evaluate whether faculty and staff members involved in the investigation and adjudication processes receive adequate training regarding Title IX regulations and other related requirements (i.e., VAWA, Clery Act).

Common Themes in Guidance and VRAs

- ❖ Comprehensive Policies and Procedures
 - ❖ Consistency in published and on-line policies and procedures
 - ❖ Communication of policies and procedures
 - ❖ Interim measures and accommodations
 - ❖ Confidential resource identification (including anonymous options)
 - ❖ Retaliation consequences
 - ❖ Prompt and equitable resolution of complaints
- ❖ Training, Awareness and Prevention Training
 - ❖ Comprehensive and mandatory for key stakeholders
 - ❖ Bystander Programs
- ❖ Annual Climate Survey

Questions



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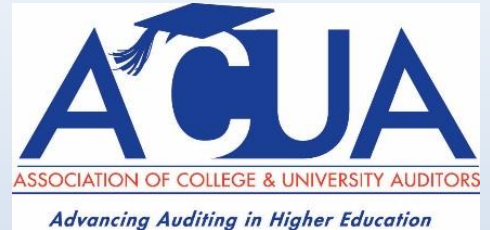
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Enhancing Network Security

- January 26, 2017



How Internal Audit & Billing Compliance/Privacy Functions Can Build a Synergistic Working Relationship

- February 16, 2017

2017 ACUA Midyear Conference – Austin, TX

- March 26-29, 2017