



2017-2018 Annual Report

POLICY ON PROHIBITED DISCRIMINATION, HARASSMENT AND RELATED MISCONDUCT, INCLUDING SEXUAL AND GENDER-BASED HARASSMENT, SEXUAL VIOLENCE, INTERPERSONAL VIOLENCE, AND STALKING

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The University of North Carolina at Chapel Hill’s Equal Opportunity and Compliance Office (EOC) oversees the University’s Policy on Prohibited Discrimination, Harassment and Related Misconduct, Including Sexual and Gender-Based Harassment, Sexual Violence, Interpersonal Violence and Stalking (Policy). EOC prepares and publishes annually a report that examines actions taken in support of the Policy and recommendations for improvement.¹ This Annual Report covers activities initiated during the period August 2017 through August 2018.

Additionally, the report contains information about reports of misconduct under the Policy and includes specific initiatives the University took during the 2017-2018 academic year to strengthen its Policy, procedures, trainings, outreach, and resources.

The University has non-discrimination policies to promote a positive and inclusive environment at UNC-Chapel Hill, so that students, faculty, and employees can stay focused on the things that matter most – learning, working, building friendships, and growing professionally. EOC oversees these policies, which prohibit discrimination or harassment based on any protected status; sexual assault or sexual violence; interpersonal (relationship) violence; stalking;

¹ The University of North Carolina at Chapel Hill’s Policy on Prohibited Discrimination, Harassment and Related Misconduct, Section XI, available at <https://unc.policystat.com/policy/4514917/latest>.

retaliation; and similar types of misconduct. EOC implements and enforces these policies by sharing information about the policies, receiving reports of potential violations, coordinating measures that help protect safety and well-being, investigating reports, and managing adjudication processes, including recommending and implementing sanctions and remedies.

EOC entered the 2017-2018 academic year under new leadership with Adrienne Allison as the Director of Title IX Compliance and Brandon Washington as the Director of EOC. Since that time, EOC has experienced a number of positive changes, including welcoming a case manager, new investigators, and an additional report and response coordinator to the team. In January, 2019, EOC moved to a new office located at 214 West Cameron Avenue next to North Carolina Hillel. The new office is a welcoming, trauma-informed, and accessible space for visitors and staff. Other notable events of the 2017-2018 academic year include UNC's [Resolution Agreement](#) with the U.S. Department of Education's Office for Civil Rights (OCR), the formation of the [University's Digital Access Advisory Team \(DAAT\)](#), and several policy initiatives aimed at ensuring UNC's policies are serving the needs of the University community. More details about this work are in this report.

We remain wholly committed to the well-being of our campus community, and this Annual Report details the progress behind that commitment. The report is divided into four sections. The first section discusses the University's Policy and provides context for how the University developed and implemented the Policy. The second section details reports made to EOC and actions taken in response during the 2017-18 academic year. The third section outlines the training, education, outreach, and awareness efforts the University undertook during the year. The fourth section details ongoing projects and initiatives in this space, and some next steps EOC and the University will undertake to further uphold our commitment to the safety and well-being of the Carolina community.

During the 2017-18 academic year, total reports of discrimination, harassment and related misconduct among students and employees were greater than in the previous year, though the number of reports that led to formal investigations were comparable to 2016-17 figures. Our total formal investigation numbers were impacted by the fact that several formal investigations in 2017-2018 entailed multiple allegations involving multiple reporting and/or responding parties that were consolidated into one comprehensive investigation. If tabulated into separate investigations, the formal investigation numbers would be higher. Meanwhile, the number of informal reports illustrate that much of our work involves providing resources, accommodations, and support for individuals who choose not to pursue a formal process or who report behavior that, even if true, would not amount to a violation of the Policy. We see evidence in these numbers that reporting parties know where and how to report, and/or are being connected to EOC through other campus resources and those designated as responsible employees. Likewise, while there are many reasons parties may choose not to pursue a formal investigation and adjudication process, EOC makes every effort to provide care, support and resources to help maximize the success and well-being of our students and employees throughout their tenure at UNC-Chapel Hill. More information about these numbers and our work is detailed in the report.

In the training and prevention realm, we continue to work hard to grow the number of offerings available to our community, and to meet students and employees where they live and work. From new student orientation and human resources office onboarding, to custom trainings for departments and student groups, our goal is to both maximize campus awareness of the Policy, resources, and reporting options and empower individuals and groups to understand nuanced issues and affect campus culture on the ground. Trainings were held in units and departments, educational programs were offered to students, and ongoing training programs continued in

tandem with partners in Human Resources, Student Wellness, Diversity & Inclusion (D&I), and elsewhere on campus.

We never lose sight of the fact that our work is focused on people, and our commitment to your well-being is sincere and resolute. We look forward to working with you to continue to prioritize the ongoing safety of our community in the coming year.

Becci Menghini, Interim Vice Chancellor for Workforce Strategy, Equity, and Engagement

Adrienne Allison, Director of Title IX Compliance, Equal Opportunity & Compliance

Brandon Washington, Director of Equal Opportunity & Compliance

Policy on Prohibited Discrimination, Harassment and Related Misconduct, Including Sexual and Gender-Based Harassment, Sexual Violence, Interpersonal Violence and Stalking

Click here to view the [Policy](#).

Policy Background

The University adopted the Policy in August 2014 following a comprehensive policy review undertaken by a campus task force. The task force was charged with developing recommendations that satisfied the requirements of applicable federal and state law and guidance from the U.S. Department of Education’s Office for Civil Rights that incorporated trauma-informed practices, and reflected the values of the campus community. This task force included representation from the community and from more than a dozen groups and offices on campus:

The task force recommendations led to a comprehensively revised policy, as well as new procedures for responding to reports of student misconduct that prioritized the well-being of individuals and optimized efficiency and, fairness throughout the process. In addition to addressing sexual assault and related forms of misconduct, the task force recommended that the Policy address a broad range of behaviors, all of which are detrimental to the learning and working environment, including discrimination and harassment based on any protected status (i.e., age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation, veteran status).

The University adopted the recommendations in August 2014. Key components of the 2014 Policy and procedures for student misconduct include:

- more precisely defined scope of prohibited conduct
- comprehensive definitions of “consent” and “incapacitation”
- new adjudication process
- new composition and structure for the hearing panel

Specific procedures are designated for reports based on the relationship of the reporting party (any individual who reported being the subject of prohibited conduct) or responding party (any individual accused of engaging in a violation of the Policy) to the University. The University implemented the new Policy and revised [procedures](#) for reports involving students as the responding party on August 28, 2014.

In the fall of 2015 an advisory group was charged with reviewing the Policy and the revised procedures considering feedback from campus stakeholders and the data provided within the 2014-15 Annual Report. The recommendations stemming from that review informed proposed revisions to the Policy and procedures, which were submitted to the advisory group for additional feedback in the fall of 2018. The University submitted the final revisions to the Department of Education's Office for Civil Rights ("OCR") in October, 2018 as part of the University's June, 2018 Resolution Agreement with OCR. The University anticipates the revisions will be implemented later in 2019.

Reports

When EOC receives a report, the staff, sometimes in consultation with an assessment team that may include the Department of Public Safety, the Dean of Students Office, and/or the Office of Human Resources, conducts an inquiry and determines if the report alleges a possible violation of the Policy and whether, consistent with University Policy and applicable law or guidance, further action is warranted based on the alleged conduct. The assessment team determines whether there are immediate measures the University should take to protect individuals and the University community, including but not limited to interim suspension, campus and housing restrictions, or changes to work schedules. EOC is prepared to conduct a thorough investigation of each report it receives alleging a violation of the Policy; however, the Policy values, but cannot always accommodate, reporting parties' preference to simply receive resources and support. Accordingly, the reports EOC receives can be largely classified into two categories: (1) reports that require ***formal investigations*** or (2) ***informal reports***.

If a reporting party who alleges a possible violation of the Policy requests that EOC pursue an investigation and disciplinary action, an EOC investigator will notify the parties of the investigation, interview the parties and witnesses, collect relevant evidence, produce an investigation report, and render a finding as to whether a Policy violation has occurred. The EOC investigator also recommends any needed appropriate sanctions and remedies. EOC conducts this **formal investigation** and adjudication process, which affords all parties due process and opportunities to present evidence, witnesses, and testimony on their own behalf. Throughout this process, the University offers appropriate support, resources, and accommodations to all parties involved.

Reporting parties sometimes request only needed support and interim protective measures and ask that the University refrain from moving forward with an investigation. Reporting parties often choose this path of resolution because they wish to keep the details of their experiences private rather than involve potential witnesses, and/or do not want the responding party to be made aware they have made a report, or otherwise do not want to pursue a formal investigation. An assessment team evaluates these requests in relation to campus safety and that of the parties involved. In those instances where there is not an apparent larger threat to campus, the University honors the request, and the EOC provides information, support, and assistance with interim measures such as academic accommodations, changes to housing, and/or no contact

orders, among other actions, with no formal investigation. EOC categorizes these instances as **informal reports**.

The University will make every effort to respect an individual's choice regarding how to address the alleged conduct. However, when the assessment team determines that the facts and circumstances reported constitute a threat to the campus community, the University is unable to honor a reporting party's request for informal resolution. To make this determination, the assessment team considers multiple factors, including the nature and scope of the alleged conduct, whether the reported misconduct involves allegations of violence or the use of a weapon, and whether the report reveals a pattern of misconduct by the Responding Party. In these cases, EOC works with the reporting party to ensure they are aware of resources and continually informs them as the process moves forward.

The data in this report capture the number of incidents reported to EOC under the Policy. As a result, the numbers reported may vary from statistics provided in other reports and surveys. For example, the University's Annual Security Report, published in accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, describes incident information reported to many different departments and law enforcement agencies for specific geographic areas and for specific allegations of criminal acts, whether or not the individuals involved chose to report the incident agreed to speak with EOC.

The tables below delineate reports involving students and reports involving employees. In these tables, the reference to "involving" means that the individual was either a reporting party or responding party. Some reports involve a student accusing another student or an employee accusing another employee. Other reports may include a student accusing an employee or an employee accusing a student. Reports that include both employees and students as parties are counted both in the data "involving students" and the data "involving employees."

The Family Educational Rights and Privacy Act (FERPA) generally prohibits the University from disclosing information from student education records. FERPA broadly defines "education records" as records maintained by the University that are "directly related" to a student. Accordingly, education records protected by FERPA include the existence of and student information contained in reports of harassment, discrimination, and related misconduct. FERPA also prohibits the University from disclosing data in cell sizes small enough to permit the disclosure of education record information that would identify individual students. As a result, the University reports statistical data about students only in numbers of six or more. To protect the private information of students this Annual Report provides statistical information consistent with the University's general practice of reporting aggregate data in numbers of six or more.

Formal Investigations²

The data described below capture the number of **formal investigations** EOC conducted during both the 2016-17 and 2017-18 academic years. **Each investigation may have involved more than one allegation of prohibited conduct under the University’s Policy and more than one reporting party and/or responding party.** For example, one investigation may include allegations of sexual assault, sexual harassment, interpersonal violence, and stalking against the same responding party and may involve more than one reporting party. In that instance, the investigation is noted as one investigation in Table 1 and Tables 2a and 2b. Each allegation of misconduct within the one investigation is counted separately in Tables 3a and 3b below. Reports of all forms of misconduct under the Policy are provided below, including but not limited to discrimination and harassment based on any protected status, sexual assault or sexual violence, and interpersonal violence.

Table 1	Total Formal Investigations ³			
Parties Involved	Types of Policy Misconduct	2016-2017	2017-2018	Percent Change
Students and Employees	All	26	25	-3.8%

Table 2	Total Formal Investigations by Status ⁴ (All Types of Policy Misconduct)		
Table 2a	Employee as a Responding or Reporting Party	2016-2017	2017-2018
		18	12
Table 2b	Student as a Responding or Reporting Party	2016-2017	2017-2018
		16	17

Student Process

When the EOC conducts a formal investigation for any allegation of misconduct under the Policy, a trained and impartial investigator gathers facts and any available physical or documentary evidence. The investigator assesses the evidence and consults with other staff in EOC to determine whether, based on a preponderance of the evidence,⁵ a Policy violation occurred. This standard, which was required by applicable guidance from the Department of Education’s Office for Civil Rights, differs from that used in the criminal process. In cases where

² Several formal investigations entailed multiple allegations involving multiple reporting and/or responding parties that were consolidated into one comprehensive investigation. If tabulated into separate investigations, the formal investigation numbers would be higher.

³ Each formal investigation may involve one or multiple allegations of prohibited conduct and one or multiple reporting parties and/or responding parties.

⁴ If the investigation involved both an employee and student as a reporting or a responding party, the investigation is counted in both Table 2a and 2b. The investigation is not counted twice in Table 1.

⁵ The April 4, 2011 *Dear Colleague Letter* issued by the United States Department of Education’s Office for Civil Rights established that a school’s grievance procedures for reports of sexual misconduct must use a preponderance of the evidence standard. On September 22, 2017, the Office for Civil Rights issued interim guidance in the form of a new *Dear Colleague Letter* and a *Q&A on Campus Sexual Misconduct*, which rescinded the April 2, 2011 *Dear Colleague Letter* and provided more choices regarding which standard of proof schools may use in cases of sexual violence. However, this interim guidance was issued after the 2016-2017 academic year and is not applicable to the contents of this report. For information regarding the impact of the interim guidance on the Policy and related procedures, go to: <https://eoc.unc.edu/eoc-statement-department-education-guidance/>.

the investigator determines that a Policy violation has occurred, the investigator also recommends a remedy and sanction.

Formal investigations for reports in which a student is accused of violating the Policy involve a resolution that results in one of three outcomes for each allegation that is the subject of the investigation: (1) a finding of a Policy violation and proposed sanctions; (2) a finding of no Policy violation; or (3) voluntary resolution⁶. Where both parties agree to the investigative finding and any recommended sanction, or where neither party requests further review, the outcome becomes final. When the reporting party chooses to appeal the investigative finding and/or the recommended sanction, the investigation report is reviewed by a designee of the Vice Chancellor for Workforce Strategy, Equity and Engagement. The designated reviewer may request additional investigative follow-up, affirm the investigative finding, or reverse the finding. If the responding party chooses to appeal the investigative finding and/or recommended sanction, the report will be forwarded to a Hearing Panel for reconsideration and adjudication and the Hearing Panel will make a decision based on the preponderance of the evidence.⁷ If the Hearing Panel affirms that a Policy violation occurred, the sanctions and/or remedies may be the same or different than those proposed by the original investigator.

Within the investigation and adjudication process, the University is federally obligated to assume an unbiased and objective role in evidence gathering, fact finding, and determining, by the preponderance of the available evidence, whether the alleged Policy violation occurred. EOC provides all parties a fair and impartial investigation and due process. Sometimes the information presented supports a finding of violation of the Policy. In those cases, swift action is taken to address the conduct. Other times, the information presented is not sufficient to prove, by a preponderance of the evidence,⁸ that a violation of the Policy occurred. For all reports, regardless of the outcome, the University makes every effort to provide care, support, and resources to help maximize the success and well-being of our students and employees throughout their tenure at UNC-Chapel Hill.

The tables below reflect the number of formal investigations conducted by EOC that involved a student as either a reporting or responding party in the 2017-18 academic year and the related outcomes of those investigations. ***Each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy and more than one reporting party and/or responding party.*** The data is disaggregated to illustrate the reports relating to behavior prohibited by Title IX (sex and gender discrimination, as well as interpersonal violence, stalking, and related retaliation), and reports relating to discrimination and harassment based on other protected statuses.

Table 3a reflects the Title IX-related reports, including specific types of allegations reported. Table 3b provides information relating to reports of discrimination based on age, color, disability, national origin, race, veteran status, and/or religion.

⁶ If a formal investigation is pursued initially, a reporting party can request to end the formal investigation and pursue voluntary resolution at any time. EOC then assesses whether voluntary resolution is an appropriate means of resolution given the allegations involved.

⁷ See footnote 5

⁸ See footnote 5

Table 3a		Formal Investigations of Conduct Prohibited by Title IX and Related Forms of Misconduct Involving Students in 2017-2018⁹			
Total Number of <u>Investigations</u> ¹⁰		17			
Total Number of <u>Investigations</u> Resulting in a Policy Violation or Voluntary Resolution		9			
Total Number of <u>Allegations</u>		39			
Outcomes	Allegations by Type of Misconduct Alleged	Total Allegations	Policy Violations	No Policy Violations	Voluntary Resolutions
	Sexual Assault	27	8	19	0
	Interpersonal Violence	9	6	*	*
	Stalking				
	Sexual Exploitation	*	*	*	*
	Sex or Gender Discrimination/Harassment				
	Related Retaliation and Misconduct				
Total		39	16	22	*
Total Number of <u>Allegations</u> Resulting in a Policy Violation or Voluntary Resolution		15			
Number of Students found in Violation of the Policy		*			
Sanctions and Corrective Actions Resulting from Students found in Violation		Ranged from sanctions that impacted the student's status at the University, such as expulsion, indefinite suspension, suspension for a defined period of time, and/or probation for a defined period of time to other corrective measures, such as a campus no trespass order, fulfilling a behavioral education course, and/or a no-contact order (some in combination).			
Number of Employees found in Violation of the Policy		*			
Sanctions and Corrective Actions Resulting from Employees found in Violation		Sanctions included termination, written warning, and/or training (some in combination).			

* Indicates five or fewer¹¹

⁹This table includes all formal investigations in which a student was involved as the reporting or the responding party. If the investigation also involved an employee, it is included both in Tables 3a/3b and Tables 4a/4b.

¹⁰ Each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy and more than reporting party and/or responding party.

¹¹ To protect the private information of students who have submitted reports of harassment, discrimination, and related misconduct to the EOC, this Annual Report provides statistical information consistent with the University's general practice of reporting aggregate data in numbers of six or more. The Family Educational Rights and Privacy Act (FERPA) prohibits the University from disclosing information from student education records except under certain limited circumstances. FERPA broadly defines "education records" as records maintained by the University that are "directly related" to a student. Education records protected by

Table 3b		Formal Investigations of Discrimination or Harassment Based on Age, Color, Disability, National Origin, Race, Religion, or Veteran Status as the Protected Status <u>Involving Students</u> in 2017-2018 (Does Not Include Sex or Gender Discrimination Included in Table 3a)			
Total Number of Investigations ¹²		*			
Total Number of Investigations Resulting in a Policy Violation		*			
Total Number of Allegations		*			
Outcomes	Allegations by Type of Misconduct	Total Allegations	Policy Violations	No Policy Violations	Voluntary Resolutions
	Disability Discrimination/Failure to Accommodate	0	0	0	0
	Race Discrimination				
	National Origin Harassment	*	0	*	0
	Veteran Status Harassment				
	Related Retaliation and Misconduct				
	Total	*	0	*	0
Total Number of Allegations that Resulted in a Policy Violation		*			
Total Number of No Policy Violations		*			
Total Number of Voluntary Resolutions		0			
Number of Students found in Violation of the Policy		0 ¹³			
Sanctions and Corrective Actions Resulting from Students found in Violation		0			
Number of Employees found in Violation of the Policy		*			
Sanctions and Corrective Actions Resulting from Employees found in Violation		*			

FERPA therefore include information about reports students submit alleging harassment, discrimination, and related misconduct. FERPA also prohibits the University from disclosing data in cell sizes small enough to permit the disclosure of education record information that would identify individual students. As a result, the University reports statistical data about students only in numbers of six or more.

¹² Each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy and more than one reporting party and/or responding party.

¹³ There were no reports in this category in which a student was accused of violating the Policy.

* Indicates five or fewer (see footnote 11)

Employee Process

Formal investigations for which an employee is accused of violating the policy involve a resolution that results in one of two outcomes for each allegation that is the subject of the investigation: (1) a finding of a Policy violation and proposed corrective action, or (2) a finding of no Policy violation. When an employee is found to have violated the Policy after a formal investigation, EOC makes recommendations for remedies and sanctions. Under the current procedures, the employee's department or unit has the ultimate authority to determine the appropriate disciplinary action, and the employee may appeal the disciplinary action through a separate grievance process applicable to their employment category (e.g., faculty may appeal through the Faculty Hearings Committee, an SHRA employee may appeal through the SHRA grievance process, an EHRA employee may appeal through the EHRA grievance process). ***Again, each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy and more than one reporting party and/or responding party.*** Voluntary resolution is not available as a path of resolution in the procedures for reports against employees; however, in some instances, a report may be resolved informally, or an employee may choose to resign or take other corrective measures while an investigation is pending. If an employee chooses to resign while an investigation is pending, the EOC will continue the investigation until it is complete.

The tables below reflect the number of formal investigations EOC conducted that involved an employee as either a reporting or responding party in the 2017-18 academic year and the related outcomes of those investigations. The data is disaggregated to illustrate the reports relating to behavior prohibited by Title IX (sex and gender discrimination, as well as interpersonal violence, stalking, and related retaliation) and reports relating to discrimination and harassment based on other protected statuses. Table 4a reflects the Title IX-related reports, including specific types of allegations reported. Table 4b provides information relating to reports of discrimination based on age, color, disability, national origin, race, veteran status and/or religion.

Table 4a		Formal Investigations of Conduct Prohibited by Title IX and Related Forms of Misconduct Involving Employees in 2017-2018¹⁴		
Total Number of <u>Investigations</u> ¹⁵		11		
Total Number of <u>Investigations</u> that Resulted in Finding a Policy Violation		6		
Total Number of <u>Allegations</u>		15		
Outcomes	Allegations by Type of Misconduct Alleged	Total Allegations	Policy Violations	No Policy Violations
	Sexual Assault			
	Interpersonal Violence			
	Stalking	*	*	*
	Sexual Exploitation			
	Sex or Gender Discrimination	9	*	*
	Sexual Harassment			
	Related Retaliation and Misconduct	*	*	*
	Total	15	6	9
Total Number of <u>Allegations</u> that Resulted in Finding a Policy Violation		6		
Number of Students found in Violation of the Policy		0 ¹⁶		
Sanctions and Corrective Actions Resulting from Students found in Violation		0		
Number of Employees found in Violation of the Policy		6		
Sanctions and Corrective Actions Resulting from Employees found in Violation		Sanctions included termination, voluntary resignation, written warning, and/or training (some in combination).		

* Indicates five or fewer (see footnote 11)

¹⁴ This table includes all formal investigations in which an employee was involved as the reporting or the responding party. If the investigation also involved a student, it is counted both in Tables 3a/3b and Tables 4a/4b.

¹⁵ Each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy and more than one reporting party and/or responding party.

¹⁶ There were no reports in this category in which an employee accused a student of violating the Policy.

Table 4b		Formal Investigations of Discrimination or Harassment Based on Age, Color, Disability, National Origin, Race, Religion, or Veteran Status as the Protected Status <u>Involving Employees</u> in 2017-2018 (Does Not Include Sex or Gender Discrimination Included in Table 4a)		
Total Number of Investigations ¹⁷		*		
Total Number of Investigations Resulting in a Policy Violation		*		
Total Number of Allegations ¹⁸		8		
Outcomes	Allegations by Type of Misconduct	Total Allegations	Policy Violations	No Policy Violations
	Disability/Failure to Accommodate	0	0	0
	Race	*	*	0
	Color			
	National Origin	*	*	*
	Veteran Status			
	Age			
	Religion			
	Related Retaliation and Misconduct	*	*	*
Total	8	*	7	
Total Number of Allegations that Resulted in a Policy Violation		*		
Total Number of No Policy Violations		*		
Number of Employees found in Violation of the Policy		*		
Sanctions and Corrective Actions Resulting from Employees found in Violation		Corrective actions included training and/or adjustment of work duties.		

* Indicates five or fewer (see footnote 11)

Sanctions, Corrective Actions, and Remedies

Where EOC determined Policy violations in cases involving Title IX and related misconduct as described in the charts above, students and employees received sanctions and corrective actions, often in combination. Sanctions and corrective actions for students in the 2017-18 academic year included expulsion, indefinite suspension, suspension for a defined period of time, probation, orders of no-contact, restrictions from campus, and behavior management education. In the same academic year, the following sanctions and corrective actions were issued to employees,

¹⁷ Each formal investigation may involve more than one allegation of prohibited conduct under the University's Policy.

¹⁸ As part of the employee grievance process, one reporting party may select boxes on a grievance form indicating discrimination based on disability, age, race, religion, gender, sex and veteran status by multiple persons allowing reporting parties to allege discrimination against multiple responding parties based on multiple types of protected statuses.

often in combination: termination, voluntary resignation, written warning, reassignment of duties, and training. Given the broad range of prohibited behaviors under the Policy, sanctions and corrective actions are tailored to the facts and circumstances of each report, the impact of the misconduct on the reporting party and surrounding community, and accountability for the responding party. EOC also identifies remedies to address the effects of the conduct on the reporting party, to restore safety and well-being to the entire University community, and to maximize the reporting party’s educational and employment opportunities. Such remedies have included, but are not limited to, academic, housing, and employment accommodations; housing and parking arrangements; reassignment of the responding party’s housing or employment duties; and educational programs or climate assessments targeted to specific groups or departments. In some cases, the University resolved reports between students through voluntary resolution.

Informal Reports, Resources, and Interim Protective Measures

The following data capture the number of informal reports the EOC received during the 2016-17 and 2017-18 academic years. As stated above, in each instance, the reporting individuals ***were informed of, offered, and provided available support and interim protective measures as needed and appropriate (e.g., academic accommodations, changes to housing, changes to class or work schedules), but requested that the University refrain from moving forward with a formal investigation.*** After conducting an assessment and determining that the campus was not at future risk, the University honored the preference of the reporting individual. The University strives to honor the wishes of reporting parties, when possible, because it wants to encourage individuals to seek help and resources by reporting the behavior at issue.

Table 5	Informal Reports¹⁹			
Involved Individuals	Types of Alleged Policy Misconduct²⁰	2016-2017	2017-2018	Percent Change
Students and Employees ²¹	All	465	479	+3.0%

¹⁹ Each informal report may involve one or more allegations of prohibited conduct and one or multiple reporting parties and/or responding parties.

²⁰ These numbers include reports of behavior that EOC ultimately determined did not fall under the Policy, but EOC still offered resources and directed the parties to the appropriate support and reporting entities.

Table 6		Informal Reports by Status (All Types of Alleged Misconduct)²²	
Table 6a	Employees as a Reporting or Responding Party	2016-2017	2017-2018
		159	198
Table 6b	Students as a Reporting or Responding Party	2016-2017	2017-2018
		348	353

Table 7		Informal Reports by Specific Type of Allegation of Misconduct²³				
Table 7a	Employees as Reporting or Responding Parties	2017-2018		Table 7b	Students as Reporting or Responding Parties	2017-2018
Types of Alleged Policy Misconduct				Types of Alleged Policy Misconduct		
Sexual Assault				Sexual Assault		
Sexual Harassment				Sexual Harassment		
Sex or Gender Discrimination				Sex or Gender Discrimination		
Interpersonal Violence				Interpersonal Violence		
Stalking				Stalking		
Sexual Exploitation				Sexual Exploitation		
Discrimination or harassment based on age, color, disability, national origin, race, or religion as the protected status				Discrimination or harassment based on age, color, disability, national origin, race, or religion as the protected status		
Other types of conduct not based on protected status				Other types of conduct not based on protected status		

* Indicates five or fewer (see footnote 11)

The Policy emphasizes providing for the care and well-being of students and employees through interim protective measures along with confidential supports. Interim protective measures may provide critical assistance to those who report having experienced discrimination, harassment, retaliation, and/or violence. We encourage all campus members to seek support regardless of whether they would like to pursue a formal investigation. Our Report and Response Coordinators can provide information about immediate support and resources to help ensure safety and well-being. The most important element of our work centers on the provision of support, resources, and services to help our campus community members.

The University and surrounding community have many resources dedicated to supporting the campus community's safety and well-being, as well as fulfilling the University's Equal Opportunity and Title IX responsibilities. Each resource set forth in the University's Policy

²² If the informal report involved both an employee and student, the report is included in both Table 6a and Table 6b; however, the report is counted only once in Table 5.

²³ If the informal report involved both an employee and a student, it is included in both Table 7a and Table 7b. Also, each report may have involved one or more allegations and therefore the numbers in Table 7a and 7b do not match the overall numbers in Tables 5 and Table 6a/b. s

meets a unique need. Individuals may use or request as many or as few of these options as needed.

Law Enforcement: Criminal Investigation

At any time, students and employees can call 911 for protection and to initiate a criminal investigation. When 911 is dialed from campus, UNC Police responds. UNC Police informs the necessary University staff of relevant incidents. Similarly, University staff work closely with local law enforcement agencies to support individuals who report that they have experienced violence or criminal conduct off campus.

University Reporting: Campus Protective Measures and Proceedings

Reporting to the University involves exploring all reporting and support options, including the option to seek a formal investigation and adjudication process under the University's Policy and/or accessing or utilizing any available interim protective measures such as academic accommodations, changes to housing, and changes to class or work schedules. Individuals are encouraged to make reports to the Report and Response Coordinators, Title IX Compliance Coordinator, or the Director of EOC. These individuals and staff within the EOC are well trained on how to respond to reports, document incidents, and conduct investigations.

Confidential Medical Support: Care and Evidence Collection

Campus Health Services and the Emergency Department at UNC Hospitals can provide evidence collection, treatment of injuries, and medication for sexually transmitted infections and pregnancy prevention. Forensic exams can be obtained up to five days after an assault.

Confidential Support: Emotional and Psychological Support

The ComPsych Employee Assistance Program (for employees), Counseling and Psychological Services (CAPS) (for students), the Gender Violence Services Coordinators (for students and employees), and the University Ombuds Office (for students and employees) are confidential resources that offer emotional and/or psychological support. Confidential community resources, such as the Orange County Rape Crisis Center and Compass Center for Women and Families, are also available, and University staff members can connect individuals to these resources.

Students and employees may obtain confidential support whether or not they report an incident to the University or to law enforcement.

Training and Education

In the 2017-2018 academic year, the EOC continued to focus on campus engagement, training and outreach to the campus community. Through efforts by the EOC and campus partners, the University provides training and education to its students, faculty, and staff as part of its commitment to assuring a comprehensive prevention, support, and response system. Programs address types of prohibited conduct, bystander intervention, compassionate support and response, and information regarding the University's Policy and resources. The University also offers several additional trainings for students and employees that are related to the broad range of misconduct prohibited by the Policy. Some of the current offerings include:

EOC Sponsored Programs

Americans with Disabilities Training: This session is offered by EOC and is designed to provide an overview of the Americans with Disabilities Act of 1990 (ADA) and ADA Amendments Acts of 2008. The session also increases awareness of the University's Reasonable Accommodations in Employment Policy and familiarizes employees and supervisors with their responsibilities and available resources. Accessibility Resources & Service (ARS) also offers customized training programs throughout the year upon request to departments and organizations regarding reasonable accommodations, resources, and services for undergraduate and graduate/professional students with disabilities. More than 300 people participated in this training during the 2017-18 year.

Blueprint for Engaged Supervision Training (BEST): EOC partners with the Office of Human Resources to provide BEST, which is a training session required for all first line supervisors of SHRA employees. The session provides in-depth education about harassment and discrimination, covering hostile environment and quid pro quo harassment. The program also identifies inappropriate workplace behaviors, requirements for religious holidays and other religious accommodations, and reasonable accommodations for disabilities under the ADA. Participants discuss employee and supervisory responsibilities in these areas, receive guidance on how to maintain an inclusive and respectful work environment, and learn information about reporting options and support resources. 315 people participated in BEST in the 2017-18 year.

Carolina Career Conversations: This program is hosted by EOC and provides career outreach to veterans and individuals with disabilities seeking employment opportunities at UNC-Chapel Hill. The presentation includes information about the benefits of working at UNC, the University's commitment to diversity and inclusion, support and resources available for veterans and individuals with disabilities. The session provides potential applicants with a step-by-step process for applying for positions at hr.unc.edu. 15 people participated in this program during the fall of 2017.

Equal Employment Opportunity and Diversity Fundamentals (EEODF): This comprehensive 7 hour program provides UNC-Chapel Hill and external State of North Carolina management staff with knowledge of equal employment opportunity laws and hands on experience understanding managerial roles and responsibilities in identifying and eliminating discrimination and harassment in the workplace. The training also provides an overview of the services and resources EOC offers, as well as other reporting options and support resources.

HAVEN (Helping Advocates for Violence Ending Now): HAVEN is a collaboration between EOC, the Carolina Women's Center, the Office of the Dean of Students, and Student Wellness. This training provides students, faculty, and staff with tools to be an ally to someone who has experienced sexual or interpersonal violence or stalking. The three-hour training emphasizes the importance of listening, responding compassionately, and connecting those affected by violence to resources on campus and in the community. In the 2017-18 academic year, HAVEN facilitators trained 159 students and 170 employees.

Honor at Carolina at New Student Orientation: This session emphasizes the expectation that members of the Carolina community conduct themselves in a manner that promotes honor, integrity, safety, and respect and welfare of others. New students learn that discrimination, harassment, and related forms of misconduct are strictly prohibited at Carolina. Students also learn about the definition of "consent" under the Policy, campus resources, and how to help a friend in need. Approximately 5,000 first-year and transfer students attended the

session prior to the start of the academic year. The session is led by staff from the Office of Student Conduct and EOC.

Human Resources Office Onboarding: This program is designed for new human resources representatives and part of the program includes an overview of the services and resources EOC offers to the campus community. The session also provides definitions of harassment and discrimination, identifies inappropriate workplace behaviors, defines employee and supervisory responsibilities when made aware of alleged discrimination and harassment in the workplace, and provides information about reporting options and support resources.

Lunch and Learn Sessions

Open to all students and employees, this program provides an overview of the services and resources the EOC offers and explores the types of conduct that constitute harassment and discrimination. The courses covered sexual harassment awareness and response, the Americans with Disabilities Act, race and religious discrimination and harassment prevention as well as the Policy on Prohibited Discrimination, Harassment and Related Misconduct.

Preventing Unlawful Discrimination and Harassment: Available for all university employees, this session increases awareness about and provides guidance regarding the types of behavior that constitute harassment and discrimination. The session provides an overview of what characteristics or “protected statuses” are covered by the Policy and relevant law, identifies inappropriate workplace behaviors, defines employee and supervisory responsibilities when made aware of alleged discrimination and harassment in the workplace, and provides information about reporting options and support resources. The EOC also offers a sessions focused solely on sexual and gender-based harassment and discrimination and a session dedicated to information about harassment and discrimination based on religion, race, color and national origin.

Responsible Employee Training: The University conducts mandatory annual training for “Responsible Employees” under the Policy. Employees with administrative or supervisory responsibilities on campus or who have been designated as Campus Security Authorities are Responsible Employees. See the [Policy](#) for more information.

Upon receiving a report of a potential Policy violation, Responsible Employees will safeguard an individual’s privacy, but are required by the University to immediately share all details about the report. Specifically, Responsible Employees must communicate the following information to EOC or to the Title IX Compliance Coordinator in person, by telephone, electronically, or by email: the known details of the incident (e.g., date, time, location), the names of the parties involved, a brief description of the incident, and whether the incident has been previously reported. Such reporting ensures timely support for all parties and enables an effective and consistent institutional response. The mandatory annual training for Responsible Employees outlines the types of conduct these individuals are expected to report, the procedures for reporting, and tips on how to inform students and peers of these reporting responsibilities. The annual training required for designated Responsible Employees is available online and EOC will conduct an in-person training for groups upon request. In the 2017-18 academic year, 1,507 people completed the training.

Search Committee Training: This training session provides search committees with relevant information regarding the search committee’s function and responsibility for ensuring a fair and inclusive employee recruitment process. It includes a discussion about the University’s Equal Opportunity Plan as well as information about implicit bias and how it may impact

recruitment and hiring decisions. 85 search committee representatives participated in this training in 2017-18.

Title IX Awareness and Violence Prevention Training: The University provides an online training module about prohibited sexual and gender-based discrimination, harassment, and retaliation that all students and employees are required to complete. This module offers information about:

- How to identify sexual and gender-based harassment and violence, interpersonal violence, and stalking
- How to report and respond to incidents of sexual and gender-based harassment and violence, interpersonal violence, and stalking
- The requirements of Title IX and related laws and guidance
- The University's prohibition against retaliation
- The University's Policy and procedures

The University requires that every student complete the training annually. Faculty members and staff are also required to complete the training when they are first employed and subsequently on a biennial basis.

Custom Training: EOC and many of the other departments referenced above also coordinate and direct custom training and consulting services for groups and units on or connected to campus. These programs include, but are not limited to, targeted outreach to student-athletes and coaches, the Greek community, and residence hall directors and communities. Custom training also includes the "Lunch and Learn" topical sessions discussed above, *Discrimination and Harassment Prevention in the Workplace* and *Preventing Unlawful Discrimination and Harassment*. In 2017-18, the EOC provided custom training to more than 950 employees and students.

Campus Partner Programs

Diversity in the Classroom: The Office for Diversity and Inclusion (D&I) offers this workshop, which provides emerging educators with strategies and tools for recognizing diversity, understanding culture and its influence on classroom dynamics, and advancing discourse around diversity issues within a classroom.

Diversity and Leadership: This workshop, offered by D&I, provides resources and strategies for inclusive leadership. The program focuses on ways for diverse teams to encourage transformational workplaces. The session uses a strengths-based approach to explore identity, skills and talents, and provides participants with resources to address barriers and challenges that can arise in multicultural environments.

Diversity in the Workplace Workshop: D&I offers this workshop to help units and groups understand University policies and procedures related to diversity. This workshop also addresses diversity and its intersections, influence on identity and work performance, climate, and overall team dynamics.

Everfi's Haven: Understanding Sexual Assault: Student Wellness provides a mandatory online training for incoming students to learn about important prevention skills for sexual assault and relationship violence. This online module is separate from the in-person HAVEN training described below. In the 2017-18 academic year, 4,882 students completed the training.

Green Zone: Green Zone is training offered by the Office of the Dean of Students for faculty and staff who wish to learn more about the military-affiliated student experience. Its goals are to train members of the Carolina community about the challenges and concerns faced by military-affiliated students and to identify individuals who are available to assist this population.

Men's Project: Coordinated by Student Wellness and the Carolina Women's Center, this program is an initiative that seeks to create opportunities for students to learn, listen, reflect, and work together to increase men's involvement in gender equity and violence prevention efforts. The UNC Men's Project works to promote positive, healthy, inclusive, and non-violent masculinities. In the 2017-18 academic year, the Men's Project had 1 cohort with 5 student members. The group facilitated 3 "Coffee Conversation" events, engaging 30+ students in conversations on culture change and relationships in the media. This cohort worked to finalize the curriculum for a new, peer-led "Masculinity 101" workshop to facilitate conversations about power, privilege, gender, and violence with other students on campus.

One ACT and One ACT for Greeks: One ACT is a skills training program offered by Student Wellness for students who are interested in preventing violence and learning about bystander intervention. Peer educators and a full-time or graduate student staff member lead the program. One ACT for Greeks is specially tailored for members of Greek organizations. In the 2017-18 academic year, Student Wellness facilitated 38 One Act and One ACT for Greeks training programs, reaching around 600 participants total. Student Wellness implemented a new initiative, called One ACT for IFC, where 20 peer educators and 3 fulltime staff members trained 154 IFC members over one day.

Recognizing the Need for Cultural Competency in Our Everyday Lives: This workshop, offered by D&I, provides discussion about culture, power, and privilege within organizations and workplaces. By attending this workshop, attendees learn about microaggressions, bias, and strategies to increase self-awareness and self-reflection in work and life.

Safe Zone: Safe Zone is a four-hour training program offered by the LGBTQ Center that is designed to create a network of allies for people who may be marginalized on the basis of their sexual orientation, gender identity, or gender expression. The desired goal for the Safe Zone program is to make the University community a safer and more supportive place for people of all sexual orientations, gender identities, and gender expressions. During the 2017-2018 academic year, the LGBTQ Center conducted 32 Safe Zone trainings, and the program added 819 new Safe Zone allies. Additionally, 99 percent of participants reported having greater knowledge of sexual orientation, gender identity, and gender expression as a result of the training.

Sustaining Healthy Relationships: This six-lesson online module offered by the LGBTQ Center and Student Wellness introduces participants to healthy relationship ideas and addresses the dynamics of interpersonal violence and bystander intervention.

THINKPosium: This annual program is led by D&I to help build capacity and cultural competency for inclusive teaching and learning practices among staff and faculty. The 2017 program titled "Exploring Our Stories," explored how storytelling can lead to empathy, understanding and new perspectives. The symposium also served as an introduction to the renamed Office for Diversity and Inclusion (D&I). Participants took part in a workshop called "StoryLeading: How to Engage Our Narratives Toward Inclusion" before ending the event with an afternoon panel discussion. There were 275 participants for this event.

Awareness and Outreach

In addition to training and education programs, the University has continued to focus on growing and improving the awareness of campus resources among students and expanding the network of people and offices who can distribute information, lend expertise, and aid in efforts related to both service delivery and prevention. These efforts include:

Delta Advocates: EOC, the Carolina Women’s Center, the Office of Fraternity & Sorority Life and Community Involvement, and Student Wellness partner to organize the Delta Advocates program. Delta Advocates are women-identified students in the Greek community who are trained to provide an empathetic and informed response to survivors of sexual and interpersonal violence. Delta Advocates support an environment where their peers can freely discuss their experiences and learn about support and reporting resources on campus and in the community. Delta Advocates collaborate with campus and community partners to engage the Greek community in campus prevention efforts. They strive to create space for open and meaningful dialogue around interpersonal and sexual violence and empower members to be active participants in creating a safer and more supportive Greek community at Carolina. The fourth cohort of Delta Advocates, which included 25 students, began serving in January 2017. Each participant received 39.5 hours of training.

Empowering Carolina: EOC and ARS formally launched the Empowering Carolina program in spring 2016 to raise awareness of resources, services, policies, and programs on campus for individuals with disabilities. In November 2017, Empowering Carolina hosted “Inclusion Drives Innovation” with speaker Tom Colclough, Deputy Director of the Charlotte District Office. The event was attended by 150 members of the campus and local community. There was no event in the spring of 2018. The program will continue to host events during the fall and spring semesters moving forward.

Heels United for a Safe Carolina: During the 2017-18 academic year, EOC continued to expand an awareness campaign that is unique to the UNC-Chapel Hill campus entitled Heels United for a Safe Carolina. The awareness campaign supports the University’s commitment to a safe and welcoming Carolina – a campus that is free from discrimination and harassment, sexual assault, interpersonal violence, and stalking. The campaign raises awareness of these issues and provides information about prevention efforts, available resources, and University policies.

The campaign includes a social media component as well as resources, events, and programs, including the Heels United Project.

- ***Resources and Reference Materials:*** Prior to the start of the 2017-18 academic year, students and parents received information about resources and reporting options in all new student and parent handbooks. Further, before students moved into residence halls in August 2017, nearly 10,000 quick reference guides about resource and reporting options were placed in residence hall rooms along with magnets including the resource website URL. Resident advisors received resource posters containing similar information to post in high-traffic locations within their communities; building representatives across campus also receive these posters. Key support staff received comprehensive resource guidebooks to share with the students they serve, including the Title IX Compliance Coordinator, Report and Response Coordinators, UNC Police, other local law enforcement agencies, Gender Violence Services Coordinators, the Office of the Dean of Students, CAPS, and community support resources.

- **Events and Programs:** The campaign distributed information and items with the resource website URL to thousands of students at campus events like FallFest and Safetoberfest, graduate student orientation, Kenan-Flagler’s new student orientation, resident advisor sessions, Sexual Assault Awareness Month events, and Relationship Violence Awareness Month events.
- **Heels United Project:** The Heels United Project is an ongoing communication installation about creating a safe campus for all. The project was officially launched during summer 2015 and has since continued. The project includes installations about a range of topics, including consent, bystander intervention, sexual violence, and resources on campus and in the community. The first installation, Think A.C.E for Consent, highlighted the major points of consent as it is laid out in the Policy on Prohibited Discrimination, Harassment, and Related Misconduct. This installation took place in April 2018 as part of Sexual Assault Awareness Month. Love Empowers, raised awareness about relationship violence and resources on campus. This installation took place in October 2017 for Relationship Violence Awareness Month and in February 2018 for Valentine’s Day. In October 2017, the Stick Together! installation provided information about bystander intervention and directed students to resources on campus. The last installation, Stay In Bounds, provided information about stalking, as defined in the University’s Policy, in March 2018. The Heels United Project will continue to expand going forward.

Safe.unc.edu Website: The University continues to provide up to date content on the safe.unc.edu website, which is the main online portal for University students, faculty, staff, and visitors to learn about resources and reporting options related to discrimination, harassment, sexual violence, interpersonal violence, and stalking. The website is designed to help streamline resource, reporting, and program information for students and employees.

Tar Heel Tribute: EOC, the Office of the Dean of Students, and the Office of Human Resources hosted the third annual Tar Heel Tribute program to celebrate Carolina’s veterans in November 2017. Nearly 100 people attended. The program, held at the Carolina Club, provided information about campus resources and policies for student and employee veterans.

Ongoing Policy Initiatives and Next Steps

AAU Campus Climate Survey on Sexual Assault and Sexual Misconduct: In the spring of 2019, UNC-Chapel Hill joined 33 universities nationwide in participating in a survey organized by the Association of American Universities. The confidential [survey](#) examines student thoughts about the campus climate and experiences with sexual assault, sexual harassment, interpersonal violence, and stalking. The University first participated and released results from this survey in 2015. By participating in the survey four years later, we have the unique ability to a conduct long-term analysis of sexual misconduct at Carolina. The University, led by EOC, organized an advisory group consisting of student, faculty, and staff representatives to assist and provide input in the communications, promotions, and general administration of the survey. Students and staff worked tirelessly in implementing a comprehensive promotional campaign to encourage student participation in the survey, which rendered a 20% response rate. The University will publish aggregate data from the survey in fall of 2019.

Survey and Transition Plan Project (Website Accessibility)/Digital Access Advisory Team: As part of a large transition plan project to assess UNC-Chapel Hill's overall compliance with the ADA, EOC's Associate Director/ ADA Coordinator is leading the UNC Survey and Transition Plan Working Group in a project focused on increasing digital accessibility across the University. In the past year, the group has secured approval and funding for the project, and hired a globally recognized leader in digital accessibility to create a digital accessibility roadmap, conduct audits of representative samples of digital information across UNC, and facilitate onsite digital accessibility training. The group also formed the [Digital Access Advisory Team \(DAAT\)](#). The mission of DAAT is to work on key accessibility initiatives and optimize access to web content, learning tools, mobile applications, video, and multimedia. With leadership from EOC, the DAAT continues to provide training and information on best practices to make digital resources and services accessible to all users of the campus community.

Pregnancy and Parenting Policy: In the fall of 2018, EOC finalized and published the [Policy on Pregnant and Parenting Students and Applicants](#). This policy was the product of a year-long collaboration with students and campus partners to learn about the needs of pregnant and parenting students and to identify the existing resources on campus. EOC considered this information with relevant law and guidance to develop a policy that clearly outlines the protections and accommodations afforded to pregnant and parenting students. The policy also provides detailed procedures for students seeking accommodations under the policy and a single point of contact to assist students in the accommodations process.

Religious Accommodations Policy: After consultation with employees and campus partners, and reviewing relevant law and guidance, EOC approved and published the [Policy on Religious Accommodation](#) in the fall of 2018. This policy outlines the protections and procedures for students and employees seeking accommodations for sincerely held religious beliefs and practices. The policy also provides detailed procedures for individuals seeking accommodations under the policy.

Increased Efforts to Engage Employees with Disabilities: Over the past year, EOC has led a number of initiatives to increase awareness about policies and resources on campus for employees with disabilities and to expedite and simplify the process for seeking reasonable accommodations and for self-identifying. These efforts have included updating the ADA Reasonable Accommodations Policy, developing a more efficient tracking and record maintenance system, and hosting a number of education, outreach, and awareness programs as outlined above.

OCR Resolution Agreement: In June of 2018, UNC-Chapel Hill entered into a [Resolution Agreement](#) with the U.S. Department of Education's Office for Civil Rights (OCR), concluding an investigation of our Title IX program that arose out of a complaint filed more than 6 years ago. Through the Resolution Agreement, OCR recognized the extensive work by EOC and campus partners over the past several years to improve the University's response to reports of sexual harassment and sexual violence. As part of the agreement, UNC agreed to five specific revisions to existing policies to clarify procedural aspects of the report and response process. At the time the Resolution Agreement was executed, the University had already engaged in two separate policy initiatives aimed at identifying areas of improvement in the Policy and related procedures: the Policy Review Advisory Group and the Employee Procedures Working Group. Charged in 2015, the Policy Review Advisory Group spent considerable time and effort reviewing data and collecting feedback from a wide range of individuals involved with the Policy, including parties who have been directly involved in reports. The advisory group delivered a list of recommended changes to the Policy and supporting student procedures in the spring of 2017. Charged in 2015 to examine all of the procedures that apply when employees are alleged to have

violated the Policy and make recommendations for changes, the Employee Procedures Working Group met from October 2015 through October 2016 and delivered a set of recommendations in 2017. Members of both groups included students, faculty, and staff. EOC considered the recommendations from both groups and drafted revisions to the Policy and supporting procedures to reflect those recommendations. These revisions included the five items that were identified in the Resolution Agreement. Before submitting the proposed revisions to OCR for approval, EOC engaged student, faculty, and staff representatives from across campus to ensure that the policy revisions that were submitted to OCR reflect the needs of the campus community. More information about the work of the Policy Review Advisory Group and the Employee Procedures Working Group can be found in the 2016-2017 Annual Report.