



Meena Morey Chandra
Office for Civil Rights
Cleveland Office
U.S. Department of Education
1350 Euclid Avenue, Suite 325
Cleveland, OH 44115

September 11, 2014

**Re: The Ohio State University Resolution Agreement
First Progress Report**

Dear Ms. Morey Chandra,

Pursuant to the Resolution Agreement entered into by the U.S. Department of Education's Office for Civil Rights (OCR) and The Ohio State University (Ohio State), the University committed to report on progress towards meeting the various requirements outlined in the Agreement. This letter serves as our first such report.

COMPLETED REQUIREMENTS

Section I: Title IX Coordinator (Agreement pp. 2-4)

Requirement: This section requires publication of a detailed statement outlining the roles and responsibilities of Ohio State's Title IX Coordinator by November 15, 2014. From our analysis of resolution agreements signed by other universities, this section is a standard requirement in all such agreements.

Response: As was made clear in the documents we provided to OCR during its four-year proactive compliance review of Ohio State's Title IX program, and as noted on page one of the Resolution Agreement, the University has long had a designated Title IX Coordinator with clearly defined roles and responsibilities and has communicated about this critical position to the campus community. The Title IX Coordinator is housed in the Office of University Compliance and Integrity, and our website (<http://compliance.osu.edu/>) previously identified the Title IX Coordinator and provided her contact information. Our budget includes funding for the Title IX Coordinator, Program Manager, Compliance Investigator, and additional resources needed to oversee the University's robust Title IX program. Many other units also support our Title IX program, including Student Life, Human Resources, Public Safety, and Athletics. The Title IX Coordinator's role, and university's Title IX Program itself, has been set out in our Title IX Program Statement (<http://titleix.osu.edu/PDFs/Program.pdf>).

Section I of the Resolution Agreement requires us to describe these pre-existing responsibilities of our Title IX Coordinator in a written statement. We enclose this statement, entitled "Title IX Coordinator Statement of Roles and Responsibilities." As further required, we have published

the document on our existing Title IX website (<http://titleix.osu.edu/>), which serves as a “one stop shop” for Title IX for the University community.

We believe this response constitutes full compliance with all requirements defined in Section I (pages 2-4) of the Resolution Agreement.

Section III.A: Notice of Nondiscrimination Statement (Agreement pp. 4-5)

Requirement: This section requires Ohio State to re-title its Notice of Nondiscrimination and add contact information for the University’s Deputy Title IX Coordinators.

Response: Ohio State has revised the Notice of Nondiscrimination as requested and it will again be posted on appropriate websites. It is available here:
<http://hr.osu.edu/public/documents/policy/resources/110nondiscrimnotice.pdf?t=201491191042>.

We believe this response constitutes full compliance with the requirement defined in Section III.A of the Resolution Agreement.

Section III.D: Revision of Campus Police website (Agreement p. 8)

Requirement: This section requires Ohio State to make two additions to the Police Division’s webpage under the “Reporting Sexual Assault” link.

Response: Ohio State has revised the webpage as requested, and it is available here:
http://www.ps.ohio-state.edu/police/campus_safety/reporting_sexual_assault.php.

We believe this response constitutes full compliance with the requirement defined in Section III.D of the Resolution Agreement.

Section IV.F: Review of Student Wellness Center Programming (Agreement p. 10)

Requirement: This section requires the University’s Title IX Coordinator to work with the Student Wellness Center by December 15, 2014 to ensure that all of its offered presentations for sexual violence education and support are consistent with the University’s Title IX policies and procedures, including the clarifications and changes outlined in the OCR agreement.

Response: The Title IX Coordinator has engaged in a review of all programming presented by the Student Wellness Center’s Sexual Violence Education Coordinator and made necessary revisions to ensure programming meets the standards set forth in the Resolution Agreement.

We believe this response constitutes full compliance with the requirement defined in Section IV.F of the Resolution Agreement.

Section V.B: Membership of Sexual Violence Consultation Team (Agreement p. 11)

Requirement: This section requires Ohio State to add a representative from the Office of Human Resources to our existing Sexual Violence Consultation Team (SVCT), effective immediately.

Response: As was made clear in the documents we provided to OCR during its four-year voluntary compliance review of Ohio State's Title IX program, and as noted on page one of the Resolution Agreement, the University has long had a designated Sexual Violence Consultation Team (SVCT).

Ohio State has now added a representative from the Office of Human Resources to its existing SVCT. Information on the SVCT can be found in the Title IX Program Statement located on the Title IX website at <http://titleix.osu.edu/PDFs/Program.pdf>, referenced above.

We believe this response constitutes compliance with Section V.B. Pursuant to the Reporting Requirements applicable to Section V, we will provide OCR with documentation by January 15, 2014 showing regular participation by the Human Resources representative at upcoming SVCT meetings.

Section V.D: Campus Focus Group (Agreement p. 12)

Requirement: This section requires Ohio State to establish a campus focus group consisting of representative leaders from the student community and University officials by September 30, 2014. This focus group is to provide input regarding strategies for ensuring: (a) students understand their rights under Title IX; (b) students know how to report possible violations of Title IX; and (c) Ohio State continues to meet its obligation to promptly and equitably respond to Title IX complaints.

Response: Ohio State has established this focus group with the required scope as a subcommittee of our existing Sexual Violence Committee. Information on this group can be found at <http://swc.osu.edu/sexual-violence/sexual-violence-committee-svc/>.

We believe this response constitutes full compliance with the requirement defined in Section V.D of the Resolution Agreement.

ITEMS IN PROGRESS

Section II: Document Maintenance (Agreement p. 4)

Requirement: This section requires Ohio State to provide verification of documentation of its receipt, investigation, and resolution of all Title IX complaints, in addition to the documentation it already maintains.

Response: Ohio State maintains a comprehensive document management and tracking system for complaints adjudicated through Student Conduct. Complaints investigated elsewhere,

including by this Office, are tracked through a separate system. We are in the process of creating a coordinated system for all Title IX complaints and will provide an update to OCR before December 15, 2014.

Section III: Title IX Policies, Procedures, and Related Written Materials (Agreement p. 4)

Requirement: This section requires Ohio State to review and revise policies and procedures relevant to allegations of sex discrimination.

Response: In our proactive compliance review, your office noted that Ohio State's policies could serve as a model for other universities. The Resolution Agreement notes various technical corrections that will make these policies simpler and clearer for students. We have convened a working group to begin review of relevant University policies and procedures, and we will submit the revised policies by October 15, 2014.

Section IV: Training (Agreement p. 9)

Requirement: This section requires the University to provide periodic training to Title IX coordinators, investigators, administrators, professors, instructors, residential assistants, coaches, University police, housing (including any student employees) staff and other staff who interact with students on a regular basis, and identify additional training needed for specific groups. Revision of existing orientation programs for freshmen, returning students, and on-campus residents is also required.

Response: Ohio State currently engages in robust training for the campus community on awareness and prevention of sex harassment and sexual violence, and we are in the process of strengthening and broadening those training initiatives for the identified groups. We are in the process of developing on-line training to ensure that training delivery is simple and effective. Copies of all training materials will be provided by December 15, 2014.

Section V: Climate Assessment and Response (Agreement p. 11)

Requirement: This section requires the University to review all Title IX-related complaints since 2012 for patterns of sex discrimination, as well as conduct a climate check with students to assess the effectiveness of steps taken by the University to achieve its goal of a campus free of sexual harassment and sexual violence.

Response: In the course of the proactive compliance review that included site visits, interviews with staff and students, and extensive reviews of complaints made to the university, OCR determined that, as stated in the Resolution Agreement, Ohio State had "[d]emonstrated responsive and appropriate actions taken against students, faculty and staff who violate Title IX as it relates to sexual harassment and sexual violence." Nonetheless, as required by Section V, we have begun a review ourselves of such complaints since 2012 for patterns of sex discrimination; we have also initiated the development of a climate survey and are gathering feedback from students, faculty, and staff on items for inclusion. We will provide a summary of

the written recommendations subsequent to the review and a draft climate check tool by January 15, 2015.

Section VI: Student-Focused Remedies (Agreement p. 13)

Requirement: This section requires the University to review all Title IX-related complaints since 2011 and take appropriate action to address any problems if identified.

Response: As noted above, in the course of the proactive compliance review that included site visits, interviews with staff and students, and extensive reviews of complaints made to the university, OCR determined that, as stated in the Resolution Agreement, Ohio State had “[d]emonstrated responsive and appropriate actions taken against students, faculty and staff who violate Title IX as it relates to sexual harassment and sexual violence.” Nonetheless, as required by Section VI, we have begun a review ourselves of such complaints since 2011, and we have not identified any significant errors regarding Title IX requirements. We will complete this review by January 1, 2015 and provide a summary of findings by February 28, 2015.

Section VII: University’s Investigation of Marching Band (Agreement p.13)

Requirement: This section codifies the corrective actions identified by Ohio State in its report pursuant to the comprehensive Marching Band investigation, and requires that the University meet its own stated objectives to evaluate and strengthen Marching Band leadership, review and revise Band policies, offer counseling and training to Band Members and staff, conduct climate checks of the Band, and offer individual remedies to Band members subjected to the sexually hostile environment. OCR requires that the University provide quarterly updates on the progress of implementation by October 15, 2014 and submit a proposed timetable of these actions by November 1, 2014.

Response: Ohio State has already begun to implement these corrective actions, including providing counseling and training to band members and staff. We will provide quarterly status updates and submit an implementation plan according to the timetable set forth in the Resolution Agreement.

Ohio State will continue to demonstrate its long-standing commitment to vigorously addressing sexual assault and sexual harassment on its campuses, including increasing the awareness of sexual harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects. We will continue to meet our requirements under the Resolution Agreement and report progress to you.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Gates Garrity-Rokous
Vice President and Chief Compliance Officer

Enclosure: Title IX Coordinator Statement of Roles and Responsibilities

cc: President Michael V. Drake, M.D.
Christopher Culley, Senior Vice President, General Counsel and Senior Advisor to the President
Kellie Brennan, Title IX Coordinator
Kelly Marie Johnson, OCR Team Leader (via email)
Erin Barker Brown, OCR Attorney (via email)
OCRCLMonitoringReports@ed.gov

September 11, 2014

**Title IX Coordinator
Statement of Roles and Responsibilities**

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

— Title IX of the Education Amendments of 1972, and its implementing regulation at 34 C.F.R. Part 106 (Title IX)

The Ohio State University is dedicated to providing a learning, living, and working environment that is free from sexual assault and sex discrimination. We are committed to ensuring a safe campus climate for all of our students and the entire University community. Through a comprehensive compliance program, we promote fundamental rights, advance individual and institutional integrity, and uphold the vital aims of Title IX.

This Statement outlines the roles and responsibilities of the Title IX Coordinator position. Additional information is also available through the Title IX website, <http://titleix.osu.edu/>, which serves as a streamlined point of contact for students, faculty and staff.

Oversight of Title IX Compliance:

- The Title IX Coordinator oversees the prompt investigation of complaints alleging sexual harassment; reviews findings as to whether sexual harassment occurred; reviews proposed remedies (including interim measures) necessary to address the sexual harassment, eliminate any hostile environment, and prevent its reoccurrence; and serves as consultant to any disciplinary hearing panel where sexual harassment has been determined to have occurred to ensure the University's compliance with Title IX.
 - The Title IX Coordinator meets and communicates regularly with the designated Deputy Title IX Coordinators in Student Life, Athletics, and Human Resources, to ensure the prompt, fair, and impartial resolution of complaints. The Title IX Coordinator retains oversight of any delegated responsibilities and ensures there are no conflicts of interest with regard to the Deputy Coordinators' primary job duties.
 - The Director of Student Conduct has been designated as the Deputy Title IX Coordinator for complaints involving students as respondents. The Director of Student Conduct or designee investigates and adjudicates allegations of sexual misconduct against student respondents, provides appropriate accommodations to victims, and ensures the disciplinary process meets Title IX requirements for all parties.
 - The Director of Employee Relations has been designated as the Deputy Title IX Coordinator for complaints involving employees as respondents. The

Director of Employee Relations or designee investigates and adjudicates allegations of sexual misconduct against employee respondents, provides appropriate accommodations to victims, and ensures the employee grievance process meets Title IX requirements for all parties.

- The Senior Associate Director of Athletics has been designated as the Deputy Title IX Coordinator for Athletics. The Senior Associate Director of Athletics ensures gender equity in athletic programs and communicates with the Title IX Coordinator on complaints of sexual misconduct involving athletes but does not investigate or adjudicate such complaints.
- The Title IX Coordinator will address any patterns or systematic problems that arise during the review of such complaints and assess overall efficacy of coordination and of overall response by the University to sexual misconduct, including the implementation and efficacy of interim measures taken to protect the parties during the grievance process, steps taken to stop sex discrimination/harassment found to have occurred and prevent its recurrence, eliminate any hostile environment that has been created for students, and steps taken to remedy its discriminatory effects on the complainant and others, as appropriate.
 - The Title IX coordinator oversees databases for complaints involving students, employees, and third parties, and maintains a master-tracking document for all sexual misconduct complaints.
- The Title IX Coordinator has expert knowledge of the University's Title IX grievance procedure(s) and oversees the provision of initial and ongoing training for all Deputy Title IX Coordinators and Investigators on the substantive requirements of Title IX and how to investigate complaints under Title IX that allege sex discrimination, including sexual harassment and sexual violence, filed by students, staff, or faculty.
 - The Title IX Coordinator is an expert in the subject matter and regularly provides training for campus, community, and national audiences on Title IX compliance.
 - The Title IX Coordinator, Deputy Coordinators, and Investigators complete bi-annual re-certification to ensure the University is matching best practices and meeting all regulatory requirements.
- The Title IX Coordinator is responsible for communicating with The Ohio State University Police Department regarding the University's obligations under Title IX and serving as a resource on Title IX issues. The Title IX Coordinator will be given access to police records regarding Title IX investigations, so long as it does not compromise the criminal investigation or is otherwise prohibited by law.
 - The Title IX Coordinator oversees regular sexual violence training of all our law enforcement officers. The Police Department receives ongoing training in topics such as trauma-informed response, Title IX requirements for investigations, and partnership with the university disciplinary system.
 - The Title IX Coordinator maintains protocols and procedures that address the coordination of sexual harassment and assault complaints between the Police Division and the University.

- The Police Division abides by a formal Survivor's Rights Guarantee, which ensures that all cases will be fully investigated and handled with utmost sensitivity, dignity, and professionalism, if the survivor wishes to pursue criminal charges.
-

Cross-Campus and Community Collaboration:

- The Title IX Coordinator is the designated University official with primary responsibility for coordinating Ohio State's compliance with Title IX and has no other duties that create a conflict of interest. This individual coordinates with representatives from appropriate university departments including Human Resources, Police Division, and Student Life, as well as local community support, education, health, and law enforcement resources to identify and address patterns or systematic problems under Title IX and assesses overall efficacy of coordination among university departments.
- The Title IX Coordinator is an integral part of teams and committees across the university focused on sexual violence prevention, survivor support, student safety, and response to employee concerns, such as:
 - Sexual Violence Consultation Team (SVCT)
 - Sexual Violence Committee (SVC)
 - Safety and Security Team
 - Off-Campus Safety Team
 - HR Investigations Team
 - Smaller Campus Student Life Officers Group
- The Title IX Coordinator is an integral partner with offices across the university who play a role in sexual violence education, response, support and/or prevention, such as:
 - Student Life Offices including: Student Advocacy, Student Wellness, Student Conduct, Sorority and Fraternity Life, Residence Life, Off-Campus and Commuter Student Engagement, Neighborhood Services and Collaboration, Counseling and Consultation Service
 - Office of Human Resources
 - Athletics Department
 - The Ohio State University Police Department
- The Title IX Coordinator partners with representatives from local sexual violence survivor support and education agencies to provide additional resources for our campus community.
 - Community representatives are included on the Sexual Violence Committee and involved in campus event and long-range strategic planning.
 - Community representatives receive training on campus processes and resources, and they are included in the pool of volunteers that respond to training requests from the campus community on issues of sexual violence, domestic/dating violence, stalking, bullying, sexual harassment, and gender

discrimination.

- The Title IX Coordinator partners with local law enforcement agencies to ensure seamless delivery of resources and support for student and employee survivors who report offenses outside of the university.
 - The Title IX Coordinator partners with sexual assault nurse examiners (SANE) at local hospitals to ensure appropriate referrals to campus resources are being made for student and employee survivors who are treated for trauma related to sexual violence or domestic/dating violence.
-

Increasing Campus Awareness:

- The Title IX Coordinator is responsible for the development, scheduling, and implementation of regular events hosted by or supported by the University leadership on campus to raise awareness in the campus community about all forms of sex discrimination (including sexual harassment and sexual assault) and the University's policies and procedures regarding such matters, so as to reinforce to the University community the importance of this issue to the University administration.
 - The Title IX Coordinator is connected to Sorority and Fraternity Life, Student Activities, registered student organizations, and other campus groups who regularly create campus-wide events to ensure that the topic of sexual violence education is addressed whenever possible.
 - The University supports the Sexual Violence Committee, a group of students, student life staff, academic and community partners, and university police striving to provide a coordinated community response to issues of sexual violence through research, outreach, and engagement.
 - The Title IX Coordinator is responsible for providing information to students and employees regarding their Title IX rights and responsibilities, including information about the resources available on and off campus, the formal and informal complaint processes, the availability of interim measures, and the ability to file a complaint with local law enforcement and complaint with the University simultaneously.
 - The University maintains a Title IX website, which contains comprehensive and accessible information about the law, sexual violence and harassment prevention, University policies, information for submitting a complaint or report, support services, and a links to campus support resources for victims. The website includes a complaint form for Title IX issues and a link to the university's anonymous reporting resource, EthicsPoint.
-

University-wide Training:

- The Title IX Coordinator is responsible for the development, scheduling, and implementation of necessary periodic Title IX training for the University community, including students and employees.

- The Title IX Coordinator oversees the selection and implementation of comprehensive and interactive online training modules for students, faculty, and staff, and tracks completion to ensure compliance with training requirements.
- The Title IX Coordinator partners with offices engaged in ongoing training initiatives in Student Life to ensure the content meets Title IX requirements and participation is counted and tracked per student.
 - University Orientation for new students includes a multimedia presentation with sessions on sexual violence, safety, alcohol, bystander intervention, relationships, and diversity.
 - The Sexual Violence Education and Support Team (SVES) provides evidence-based primary prevention efforts and awareness campaigns focusing on initiatives that will promote a positive shift in the culture and facilitates primary prevention workshops and campaigns delivered to students and high-risk sub-populations across campus.
 - SVES delivers prevention workshops through the First Year Success Series (FYSS), Second Year Transformational Experience Program (STEP), Wellness Workshops, Standards of Excellence fraternity and sorority programs, classroom presentations, and by request delivers and evaluates a number of workshops which incorporate primary prevention messages and aim to increase knowledge about sexual violence and sexual consent, decrease rape myth acceptance, increase pro-consent attitudes, and build communication and bystander skills.
 - *“Consent is Sexy!”* discusses sexual consent, why to get it, and how to make it hot. This interactive session promotes an honest discussion about consent and communication within relationships through a variety of activities.
 - *“Blurred Lines”* is an interactive session that breaks down sexual consent --- what it is, what it isn’t and how to get it without coercion.
 - *“Wait, have we been lied to?”* helps students rethink what they’ve been taught about sexual violence and how it happens. This session discusses many common myths about sexual assault and presents bystander intervention as a way to stop it before it happens.
 - *“Buckeyes Got Your Back (BGYB)”* is a customized bystander intervention workshop for communities on campus including mandates for fraternity members and first---year athletes. Students learn and practice bystander intervention strategies to help stop sexual violence before it happens. This program also examines sexual violence in the context of our culture and the media, integrates real---life scenarios to help students understand the scope of sexual violence, and clearly defines sexual consent
 - The University Police Department offers free courses through the Rape Aggression Defense (RAD) program each semester.

Policy Review and Revision:

- The Title IX Coordinator is responsible for periodic review and assessment of the University's Title IX policies and procedures, to ensure that they are clear and consolidated to the maximum extent possible to provide an efficient resource for students, faculty, and staff.
 - The following policies apply to response of complaints by students and employees under Title IX:
 - Sexual Harassment by Students in the Non-Employment Context; Code of Student Conduct; OSU's Sexual Misconduct Policy; Human Resources Policy 1.15: Sexual Harassment Policy; Human Resources Guidelines for Investigating Complaints of Discrimination and Harassment; Human Resources Policy 1.10: Affirmative Action, Equal Employment Opportunity & Non-Discrimination/Harassment Policy.
 - The University will revise or eliminate these policies and procedures as appropriate, including revising or adding cross-references and links between the various documents, to ensure, at a minimum:
 - All University policies, procedures, guidelines, and other documents are internally consistent and do not contain conflicting/contradictory information.
 - The documents clearly and consistently state the University's commitment to respond to all complaints and reports of sexual harassment as well as any other incidents of sexual harassment of which it knows or should know about.
 - The documents clearly and consistently state the specific University employees and/or offices that are responsible for accepting, investigating, and resolving complaints of sexual harassment, including sexual violence. If this varies depending on the type of complaint, they will clearly and consistently state where each specific type of complaint is to be filed, investigated, and resolved.
 - The documents clearly and consistently explain how complaints of sexual harassment by third parties can be made.
 - The documents clearly and consistently explain the specific University policy and/or procedure that applies to each type of complaint investigation.
 - The documents provide consistent definitions of and guidance about the University terms "sexual harassment," "consent," "sexual violence," "sexual assault," and "sexual misconduct."
 - Complainant's rights in the sexual harassment grievance process are consistently stated and are equitable to the rights afforded the alleged perpetrator of the harassment.
 - The alleged perpetrator of harassment's rights in the sexual harassment grievance process are consistently stated and are equitable to the rights afforded the complainant.
 - The documents clarify that, in determining whether sexual harassment against a student resulted in a sexually hostile environment, the University will also consider the conduct in question from both a subjective and objective perspective.

- The documents clearly describe the protections afforded against retaliatory harassment.
- With regard to mandatory reporting of sexual harassment by employees, the documents clearly and consistently state who the specific “appropriate university officer” to whom the report should be made is for each type of harassment to be reported.
- The documents provide clear and consistent assurance that, regardless of which University employee or entity processes the complaint, the Title IX Coordinator will maintain oversight of the complaint investigation and resolution, will be provided written notice of the complaint and the investigation determination, and, where sexual harassment is found to have occurred, will oversee the steps the University will take in response. These steps will not just include discipline against the harasser or steps to stop the harassment, but will also include all steps necessary, individual and systemic, to prevent recurrence, to eliminate any hostile environment and to remedy the discriminatory effects of the harassment on the complainant and others, as appropriate. The documents will provide description of the various steps and remedies that might be provided depending on the investigation findings.
- The documents, especially but not limited to the documents provided by the Student Wellness Center, the Office of Diversity and Inclusion, and Human Resources, clearly state the existence of, contact information for, and roles of the Title IX Coordinator and deputy Title IX coordinators.
- The documents clearly and consistently explain the availability of interim measures (e.g., no contact order; change in academic or living situations as appropriate with minimum burden on the complainant; counseling; health and mental services; escort services; academic support; the ability to retake a course or withdraw without penalty) before the final outcome of an investigation to ensure equal access to the University’s education programs and activities and protect the complainant as necessary. Information about interim measures will be made easy to locate and understand (e.g., with corresponding, obvious content titles instead of potentially confusing titles such as “Accommodations”). The documents will make clear that the Title IX Coordinator or other specifically designated University employee will coordinate the provision of interim measures, and that complainants will not be required to arrange such measures by themselves through multiple University departments and offices. The documents will also ensure that, when taking interim measures, the University will minimize the burden on the complainant.
- All procedures and guidelines used to investigate sexual harassment complaints (e.g., the Human Resources Guidelines, the Student Conduct Policy Guidelines, etc.) state provisions for adequate and reliable investigation of complaints, including the opportunity for both the complainant and the alleged perpetrator of the harassment to identify witnesses and other evidence; designated and reasonably prompt timeframes for the major stages of the investigation (i.e., conducting the fact-finding investigation, completing the decision-making process to determine whether the alleged sexual harassment occurred and created a hostile environment, issuing written notice of the outcome of the investigation, and determining the actions the University

will take to stop the harassment, eliminate the hostile environment, prevent its recurrence, and remedy its discriminatory effects.

- The documents clearly and consistently state that any informal mechanisms for resolving sexual harassment complaints are only to be used if the parties agree to them; that it is not appropriate for a student who is complaining of harassment to be required to work out the problem directly with the alleged harasser, and certainly not without appropriate involvement by the University (e.g., participation by a counselor, trained mediator, or, if appropriate, administrator); that in some cases, such as alleged sexual assaults, mediation will not be appropriate even on a voluntary basis; and that the complainant must be notified of the right to end the informal process at any time and begin the formal stage of the complaint process.
 - The documents provide clear assurance that, for circumstances in which there is a preponderance of the evidence that sexual harassment in violation of Title IX occurred but insufficient evidence that a particular student or employee violated the University's conduct codes, the University will still take other necessary steps to stop the harassment, prevent its recurrence, eliminate any hostile environment, and remedy the discriminatory effects of the harassment on the complainant and others, as appropriate.
-

Campus Climate Assessment:

- The Title IX Coordinator is responsible for coordinating the development and implementation of annual assessments (i.e. surveys) of campus climate with regard to sexual harassment and sexual violence.
 - The Title IX Coordinator in partnership with the Sexual Violence Committee and the Center for the Study of Student Life will convene a working group of students and staff to help gather and provide feedback on how the climate checks are conducted and how to respond to results.