



Erin Barker-Brown  
Office for Civil Rights  
Cleveland Office  
U.S. Department of Education  
1350 Euclid Avenue, Suite 325  
Cleveland, OH 44115

June 10, 2016

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

Dear Ms. Barker-Brown,

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), Ohio State committed to report on progress towards meeting the various requirements outlined in the Agreement. This letter serves as our sixteenth such report.

**Section IV.H: Training (Agreement p. 10)**

Requirement: Item IV.H of the Resolution Agreement requires the university to provide training on Title IX sex discrimination to groups identified as needing additional training based on the results of the university's climate survey by January 1, 2016.

Response: In our December 15, 2015 letter, the university outlined the groups identified as needing additional training based on the results of the climate survey conducted at the end of the 2014-15 academic year. In addition to the groups identified by OCR in the Resolution Agreement Item IV.G, the results indicated that the university should focus educational efforts toward our LGBTQ students, ROTC students, graduate and professional students, and students attending our regional campuses. The university provided an account of all training conducted during the 2014-15 academic year in our November 30, 2015 letter, and an account of all training conducted during the first semester of the 2015-16 academic year in our February 5, 2016 letter. In addition to these trainings, the university continues to review our programming model to best address the needs of high-risk populations and students at-large, as described in our December 15, 2015 letter.

Our February 5, 2016 letter requested an extension on this item based on the timing of our receipt of the climate survey data from AAU, subsequent analysis specific to those sub-populations, and the semester schedule in which most training of student organizations and other groups is conducted in early fall. We have also experienced some personnel changes in the department which develops and implements such trainings, necessitating additional time to meet this training requirement. We will provide such trainings to OCR in our October 15, 2016 progress report.

**Section III: Title IX Policies, Procedures, and Related Written Materials (Agreement pp. 4-9)**

Requirement: The third reporting requirement of Section III requires Ohio State to submit to OCR copies of all Title IX complaints filed with the university that allege sexual harassment, including sexual

violence or sexual assault during the previous year, and the university's notice to the parties of the final outcome of the grievance.

Response: Please see attached an addendum (secure flash drive) to this report for copies of the Title IX complaints filed with the university alleging sexual harassment, including sexual violence or sexual assault from June 1, 2015 to May 31, 2016 and the university's notice to the parties of final outcome of the grievance. As we have discussed previously, the majority of this information is covered by the Family Educational Rights and Privacy Act (FERPA). We believe this response constitutes full compliance with this reporting requirement.

#### **Section IV.C: Training (Agreement p. 9)**

Requirement: Item IV.C of the Agreement requires the university to provide training on Title IX sex discrimination to all administrators, professors, instructors, residential assistants, coaches, University police, all housing staff including student employees, and staff who interact with students on a regular basis by June 15.

Response: On December 2014, Ohio State submitted the Title IX training content from LawRoom/CampusClarity for delivery through our enterprise learning management system (LMS). The April 27, 2015 letter from OCR approved of that training content. The university launched the LawRoom employee course titled: "Building a Supportive Community, Preventing Sexual Misconduct and Relationship Violence" in October 2015 to all employees, including student employees. The university also launched two student modules titled, "Think About It: Campus SaVE" and "Think About It: Graduate Students" through CampusClarity's LMS in September 2015, to all Ohio State students. We believe this response constitutes full compliance with this item of the agreement.

#### **Section V.C: Climate Assessments and Response (Agreement pp. 11-12)**

Requirement: Item V.C requires Ohio State to conduct a climate check by June 15, 2015 and annually thereafter with students to assess the effectiveness of steps taken pursuant to the Resolution Agreement, or otherwise by the university, to achieve its goals of a campus free of sexual harassment, particularly sexual violence.

Response: The university submitted the proposed climate survey to be used for the 2015-16 academic year and documentation of the working group in our February 5, 2016 letter. OCR's March 14, 2016 letter approved of the university's 2015-16 climate survey. The university administered its second annual climate survey from March 23 through April 22, 2016. We believe this response constitutes full compliance with this item of the agreement.

Requirement: The third reporting requirement of Section V requires Ohio State to submit to OCR results of the climate assessment and written recommendations for any further action determined necessary.

Response: As detailed above, the university administered its 2015-16 academic year climate survey this spring. The Center for the Study of Student Life in the Office of Student Life will be analyzing the survey results over the summer and the university will release such results in fall 2016, at which time it will also develop written recommendations for any further action determined necessary. Given the time required for a thorough review of the survey results, the university requests an extension until October 15, 2016 (and the same for the 2017) survey for this reporting requirement.

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

Requirement: The fourth reporting requirement of Section V requires Ohio State to provide documentation to OCR demonstrating its implementation of item V.D regarding a campus focus group, including any resulting summaries of the information obtained and any proposed and/or completed actions based on that information.

Response: The campus focus group previously convened pursuant to this item of the agreement has provided ongoing input to the university ensuring students understand their Title IX rights, know how to report possible Title IX violations, and that the university continues to respond promptly and equitably to Title IX complaints. The group has provided advice, identified resources, facilitated collaboration, and made key decisions to fulfill the requirements outlined in the Resolution Agreement. Since the university's last progress report on this reporting requirement in our October 15, 2015 letter, the group's efforts have been specifically focused on the editing of our prior campus climate survey instrument, implementing and monitoring the BuckeyesACT Task Force budget, acquiring Green Dot bystander intervention training, hiring of additional key personnel, ongoing implementation of the online training modules for students and employees, and continuing development of the Buckeyes ACT program. The email agendas for these campus focus group meetings are enclosed (provided by secure flash drive). We believe this response constitutes full compliance with the reporting requirement covering academic year 2015-16 for providing documentation to OCR demonstrating implementation of item V.D.

Ohio State will continue to demonstrate its long-standing commitment to vigorously addressing sexual assault and sexual harassment on its campuses, including by taking effective steps to stop sexual misconduct, 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,



Kellie Brennan  
Title IX Coordinator

Enclosures (provided by secure flash drive):

Title IX Complaints and Notice of Outcome, 2015-16 Academic Year  
Campus Focus Group Meeting Email Agendas

cc: President Michael V. Drake, M.D.  
Christopher Culley, Senior Vice President, General Counsel and Senior Advisor to the President  
Gates Garrity-Rokous, Vice President and Chief Compliance Officer