

CSHL Mandatory Title IX Training



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Introduction

- Debbie Osgood
 - Partner, Hogan Marren Babbo & Rose, Ltd.
 - Works with colleges and universities on Title IX and other civil rights issues involving students and employees
 - Twenty-Five Years at the Office for Civil Rights (OCR) at the U.S. Department of Education
 - Former OCR National Enforcement Director



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- Do I Have to Be Here?: The Purposes Behind This Training
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The Purpose of This Training

- Compliance: Federal and State Laws
- Safety and Security
- A Welcoming Learning Environment Where You Can Ask Questions



The Rules of the Game

- Title IX of the Education Amendments of 1972 states:

“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.”

The Rules of the Game

- New York State Law
 - NY Education Law, Article 129-B (“Enough is Enough”)
 - Uniform Definition of Affirmative Consent
 - Amnesty Policy
 - Students’ Bill of Rights
 - Comprehensive Training Requirements
 - Reporting Requirements



Preventing Discrimination and Sexual Violence: What You Need to Know

What You Need to Know



Your CSHL website:

<https://www.cshl.edu/phd-program/about/#sexual-respect-title-ix>

What You Need to Know

- Key Policies and Procedures:
 1. Interim Policy and Procedures for Allegations of Title IX Sexual Harassment
 2. EEO/Non-Discrimination/Anti-Harassment Policy and Complaint Procedure
 3. Policy for the Prevention of and Response to Sex Discrimination, Sexual Harassment and Sexual Violence Against Students
 4. Whistleblower Policy
 5. Student Code of Conduct

What You Need to Know

CSHL Intranet Site –

Report an Incident: Any CSHL employee or student who believes they have been the object of unlawful discrimination, sexual or other harassment, or retaliation are strongly encouraged to report the matter to CSHL so an investigation can be conducted and appropriate action taken.

CSHL department and division heads, PIs, managers and supervisors who become aware of possible discrimination, retaliation, or sexual or other unlawful harassment at CSHL are required to contact the Chief Human Resources Officer or the Chief Operating Officer as indicated below.

IF THIS IS AN EMERGENCY, PLEASE CALL SECURITY (EXT 5555) OR 911.

Applicable Policies []

What You Need to Know

CSHL Intranet Site (cont.) Reporting Mechanisms

The following reporting mechanisms are available, including the ability to report anonymously.

Report Directly to Designated CSHL Contacts:

- Katie Raftery, Chief Human Resources Officer []
- John Tuke, Chief Operating Officer []
- Report may be oral or in writing (e.g., letter, note, email)
- A Complaint Form specific to reporting allegations of sexual harassment is attached to EEO/Non-Discrimination/Anti-Harassment Policy []

Online Reporting to CSHL:

- Incident Report Form is available at: []
- Can be submitted anonymously
- Allows for reports of discrimination, sexual harassment, sexual assault, and others
- Allows for the reporter to select how they would like the incident to be resolved and what level of involvement, if any, they would like to
- Once submitted, report goes to HR for action.

Reporting through EthicsPoint (third party hotline provider)

What You Need to Know

CSHL Intranet Site (cont.)

Supportive Resources

- The SightMD Center for Health & Wellness -- On-site health center services []
- Employee Assistance Program (EAP) Counseling []
- Ombuds Office []

Sexual Assault Nurse Examiner Programs at local hospitals []

Training Employee and Student Training

What You Need to Know

- Resource Documents:
 1. Student Bill of Rights
 2. Rights of Reporting Individuals
 3. 2021 Campus Climate Survey Results
 4. Incident Report Form

Located on CSHL website at:

<https://www.cshl.edu/phd-program/about/#sexual-respect-title-ix>

Interim Policy and Procedures for Allegations of Title IX Sexual Harassment

- Adopted Aug. 14, 2020, and revised Oct. 14, 2021
- Prohibits Title IX Sexual Harassment and Retaliation, as defined in the Policy
- Controls in cases involving sexual harassment when there is overlap with:
 - EEO/Non-Discrimination/Anti-Harassment Policy and Complaint Procedure, and/or
 - Policy for the Prevention of and Response to Sex Discrimination, Sexual Harassment and Sexual Violence Against Students

Interim Policy and Procedures for Allegations of Title IX Sexual Harassment



Who Does the Policy Apply to?

- Applies to employees, applicants, and students
- Applies to certain non-employees, such as guests and visitors

Interim Policy and Procedures for Allegations of Title IX Sexual Harassment

Where Does the Policy Apply?



- Applies to all education programs and activities and locations of the Laboratory
- Cyber harassment included in some circumstances
- But note, only applies to alleged sexual harassment against a person located in the United States

Interim Policy and Procedures for Allegations of Title IX Sexual Harassment



When Does the Policy Apply?

- “Title IX Sexual Harassment”, as defined by the 2020 Title IX Regulations and in the policy
- Misconduct outside the scope of the Policy may be addressed as appropriate by other Laboratory policies

Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Quid Pro Quo Harassment
 - Hostile Environment
 - Sexual Assault
 - Dating Violence
 - Domestic Violence
 - Stalking
- Retaliation



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Quid Pro Quo Harassment

An employee of the Laboratory conditioning the provision of an aid, benefit, or service of the Laboratory on an individual's participation in unwelcome sexual conduct.



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Hostile Environment

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



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Sexual Assault

Defined at 20 U.S.C. 1092(f)(6)(A)(v) of the Clery Act. The term “sexual assault” means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation (FBI). This offense includes rape and fondling.



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Dating Violence

Defined at 34 U.S.C. 12291(a)(10) in the Violence Against Women Act of 1994 (“VAWA”). This misconduct is violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the person subjected to such violence, and (2) where the existence of such a relationship is determined based on a consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Domestic Violence

Defined at 34 U.S.C. 12291(a)(8) in VAWA. This misconduct is a crime of violence committed by any person (including a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabiting with, or has cohabitated with, the victim as a spouse or intimate partner, or a person similarly situated to a spouse of the victim) against a person who is protected under the domestic or family violence laws of the state of New York or the laws of the jurisdiction in which the crime was committed.



Interim Policy and Procedures - Defining Prohibited Conduct

- “Title IX Sexual Harassment”
 - Stalking

Defined at 34 U.S.C. 12291(a)(30) of VAWA. This misconduct includes engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer substantial emotional distress. This definition incorporates the concept of cyber-stalking, which employs the use of the internet, social media, blogs, texts, cell phones, or other similar devices or forms of communication.



Interim Policy and Procedures - Defining Prohibited Conduct

- Retaliation

- Retaliation is an adverse action taken against an individual for the purpose of interfering with any right or privilege secured by Title IX or the policy or as reprisal for filing a complaint or report, supporting a Complainant, and/or otherwise participating or refusing to participate in a proceeding pursuant to this Policy.

- Retaliation may include intimidation threats, coercion or discrimination.

- Retaliation can be committed by or against any individual or group of individuals, including a Respondent or Complainant. Retaliation is still prohibited even when there is a finding of no responsibility for the allegation.



Interim Policy and Procedures - Defining Prohibited Conduct

- Cooperation/Obstructing the Process
 - Duty to Report
 - Duty to cooperate in investigation
- Alcohol and/or Drug Use Amnesty
- Confidentiality and Privacy
 - Medical Providers and Counselors
 - Maintaining Maximum Privacy Under the Law
 - Evaluating the Request for Confidentiality
 - Referral to Off-Campus Resources



Interim Policy and Procedures - Procedures

- Making a Complaint
 - Strongly Encouraged to Report
 - Emergency Assistance Available
 - Options to Proceed
 - Available Supportive Measures
 - Importance of Preserving/Obtaining Evidence

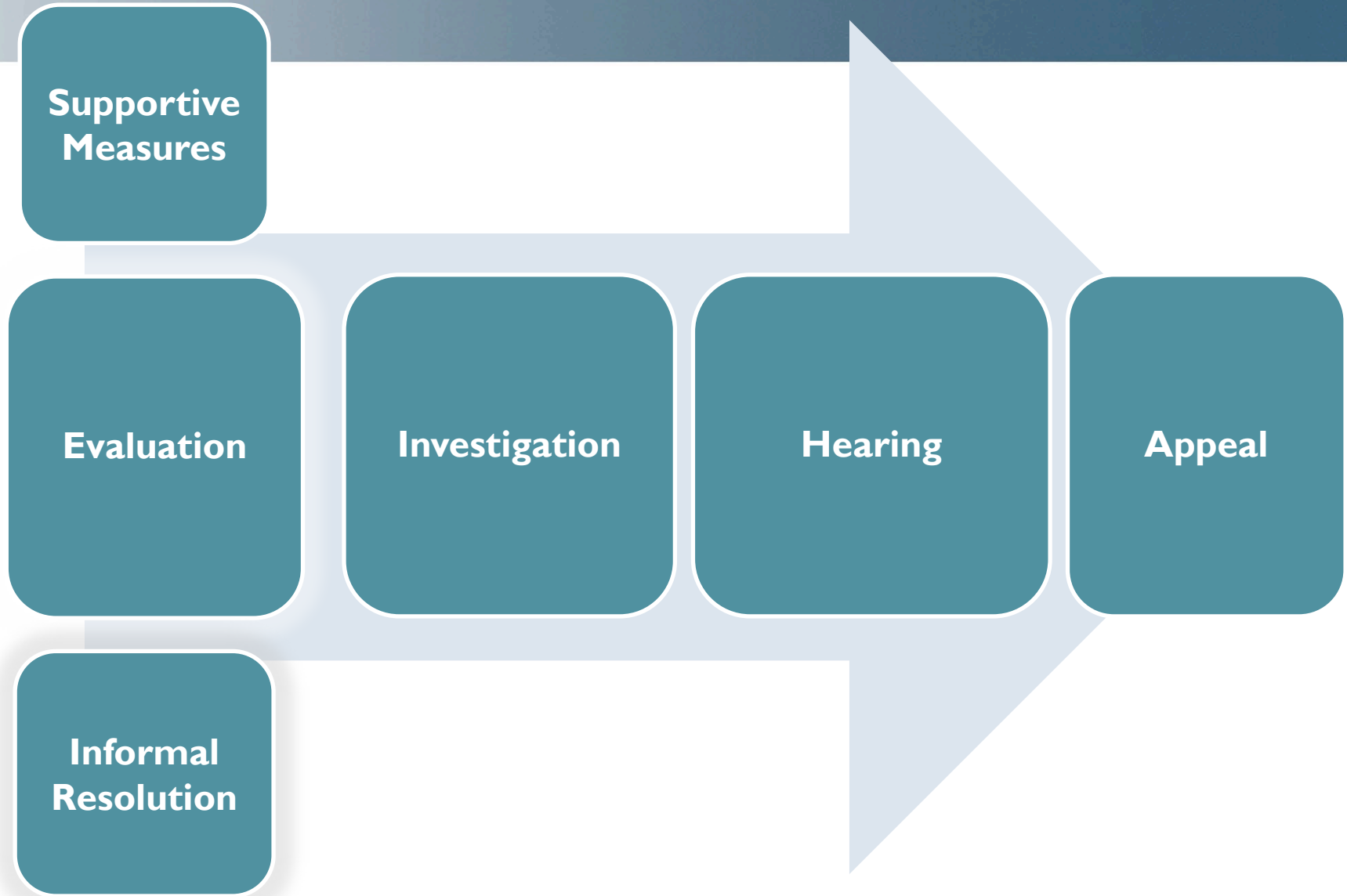
Contact:

- John Tuke
Chief Operating Officer
- Katherine Raftery
VP Human Resources/
Title IX Coordinator*
- CSHL Online Incident
Report Form:
<https://incident.cshl.edu/>

Interim Policy and Procedures - Procedures

- Initiation of a Complaint
 - Intake Meeting
 - Initial Determination
 - Notice of Investigation to the Parties
- Time Frame
 - Goal of completing all investigations, hearings and appeals within 90 to 120 business days
 - May be temporarily delayed or extended for a limited time frame for good cause

Interim Policy and Procedures - Procedures



Interim Policy and Procedures - Procedures

- Supportive Measures
 - Non-disciplinary, non-punitive, individualized,
 - Designed to restore or preserve equal access to the Laboratory's programs and/ or activities without unreasonably burdening the other party
 - Protect the safety of all parties or the Laboratory's educational environment,
 - Deter discrimination or harassment
 - Examples: counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, changes in work or housing locations, mutual no-contact orders, and/or leaves of absence

All Parties
Can Receive
Supportive
Measures

Interim Policy and Procedures - Procedures

- Emergency Removal and Administrative Leave
 - Individualized safety and risk analysis to determine whether there is an immediate threat to the physical health or safety of any student, employee, or other individual arising from the allegations that would justify a Respondent's removal.
 - For students, this may be denied access to campus, facilities or events. For employees, this may be unpaid leave or leave pending resolution of the matter.
 - Respondent will be provided with written notice of an opportunity to appeal the decision to remove a Respondent or place a Respondent on administrative leave

Interim Policy and Procedures - Procedures

- Informal Resolution
 - Available at any time prior to reaching a determination regarding responsibility and after the filing of a complaint
 - Voluntary, structured interaction between or among the parties that is designed to reach an effective resolution (parties will submit written consent to initiate this process)
 - Complainant and Respondent can request to end informal resolution and pursue an investigation at any time
 - Examples: mediation, counseling, and/or any other means of resolving a complaint other than a formal resolution process.

Interim Policy and Procedures - Procedures

- Why Informal Resolution?
 - A more educational and less punitive process
 - Quicker resolution (goal of resolution within 30 business days)
 - Less antagonistic process
- When is Informal Resolution Not Available?
 - Allegations that an employee sexually harassed a student.
- Title IX Coordinator retains the discretion to determine which cases are appropriate for informal resolution.
 - The Title IX Coordinator consider: 1) the willingness of the parties to participate in informal resolution; 2) the nature of the conduct at issue; and 3) the susceptibility of the conduct to informal resolution.

Interim Policy and Procedures - Procedures

- Formal Resolution Process
 - Investigation and Resolution
 - Investigation Report
 - Hearing
 - Written Determination
 - Sanctions/Disciplinary Actions and Remedies
 - Appeal

Interim Policy and Procedures - Procedures

- Investigation and Resolution

- Standard of Proof is Preponderance of the Evidence:

“Such evidence that, when considered and compared with that opposed to it, is more convincing, creating the belief that what is sought to be shown is more likely than not to have occurred.”

- Parties have a right to an investigation and resolution process free from conflicts of interest or bias by any Laboratory employee involved in the process.
- Presumption that the Respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the investigation and resolution process.

Interim Policy and Procedures - Procedures

- Investigation and Resolution
 - Parties will have equal opportunity to present witnesses, inculpatory and exculpatory evidence.
 - Parties will not be restricted in the ability to discuss the allegations under investigation or to gather and present relevant evidence.
 - Parties will be provided the same opportunities to have others present during the procedures, including an Advisor of their choice.
 - Parties will have written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time to prepare and participate.

Interim Policy and Procedures - Procedures

- Investigation and Resolution
 - Parties will have equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the complaint, including prior to completion of the investigative report.
 - Sexual predisposition and prior sexual behavior are typically not relevant and will not be considered as evidence unless:
 - To provide that someone other than the Respondent committed the conduct alleged by the Complainant; OR
 - To prove consent by offering specific incidents of the Complainant's prior sexual behavior with respect to the Respondent. As noted, however, the mere fact of a current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent.

Interim Policy and Procedures - Procedures

- Investigative Report
 - Draft Investigative Report:
 - States specific factual findings and will include the Title IX Coordinator's (or designee's) preliminary determination as to whether the evidence supports that Respondent has violated the Policy
 - Parties have the opportunity to respond to Draft Investigative Report
 - Final Investigative Report:
 - Includes parties' response to Draft Investigative Report, preliminary finding(s), and, if applicable, any sanctions or discipline proposed for the Respondent or remedies for the Complainant.
 - For Employee Respondents, sanctions, discipline, and remedies recommended by the Title IX Coordinator (or designee) will be immediately forwarded to the President, Chief Human Resources Officer, and the General Counsel of the Laboratory for review.

Interim Policy and Procedures - Procedures

- Hearing
 - Recorded live hearing to determine whether the evidence supports a finding of “Responsible” under the Policy under the preponderance of the evidence standard
 - Procedures include having all parties, witnesses, and other participants (Title IX Coordinator, Investigator, Advisors, support persons, etc.) present either in the same location or virtually; opportunity for cross-examination; and submission of impact statement(s)
 - Hearing Officer will determine any applicable sanctions or discipline for violations of the Policy
 - Parties will be provided with Written Determination following the hearing

Interim Policy and Procedures - Procedures

- Sanctions/Disciplinary Actions and Remedies
 - Hearing Officer will consider a number of factors, including the nature, severity of, and circumstances of the violation; disciplinary history; previous allegations involving similar conduct; need for action to prevent future recurrence; and need to remedy the effects of the discrimination, harassment, and/or retaliation.
 - Examples include training, disciplinary action including warning, censure, disciplinary probation, restitution, removal from Laboratory Housing, suspension, expulsion, termination of employment, revocation of admission and/or degree, and withholding degree, among others.

Interim Policy and Procedures - Procedures

- Appeal

- The final step in the Formal Resolution Process; appeal decisions are final.
- Not intended to be a full rehearing of the complaint.
- Allows either party to challenge a dismissal decision or the Hearing Officer's written determination regarding responsibility and/or sanctions (if applicable)
- Appeal Decision-Maker
 - Impartial, unbiased, and free from conflicts of interest
 - May not be the same person as the decision-makers that reached the determination of dismissal, Hearing Officer, Investigator, or the Title IX Coordinator
 - Will notify the parties simultaneously in writing of the outcome of the appeal, including the rationale for the result.

Interim Policy and Procedures - Procedures

- Appeal

- Grounds for Appeal

- Procedural Error. A procedural error occurred that affected the outcome, including the findings and/or sanctions or discipline. Must include a description of the error and its impact on the outcome of the case. Minor or harmless deviations from the process will not invalidate the proceedings.
 - New Evidence. New evidence that was not reasonably available at the time that the determination of responsibility was made and that could affect the outcome, including the findings and/or sanctions. Must include a summary of new evidence and potential impact on the investigation findings and/or sanctions. Information known to the parties that they chose not to present is not new evidence.
 - Conflict of Interest or Bias. The Title IX Coordinator, Investigator(s), or the Hearing Officer had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the

Interim Policy and Procedures - Procedures

- Appeal

- Possible Outcomes

- Dismiss the appeal
 - Change the determination of responsibility
 - Change the sanctions decision
 - Send the case back to the Hearing Officer to reconsider the determination of responsibility and/or sanctions
 - Send the case back to the Title IX Coordinator/Investigator for a new investigation because of bias in the previous investigation



EEO/Non-Discrimination/Anti-Harassment Policy and Complaint Procedure

- Policy with respect to nondiscrimination in employment and the Laboratory's procedure for handling student, employee and applicant complaints relating to alleged discrimination.
- Equal employment opportunity to all employees and applicants for employment without regard to protected class recognized by federal, state or local law.
- Prohibits sexual harassment in the workplace.



Recall - *Interim Policy and Procedures* controls in cases involving sexual harassment when there is overlap with this policy

EEO/Non-Discrimination/Anti-Harassment Policy and Complaint Procedure

- Prohibits:
 - Unwelcome sexual advances
 - Requests for sexual favors
 - All other verbal or physical conduct of a sexual nature, where:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or continued affiliation with the Laboratory;
 - Submission to or rejection of such conduct by an individual is used as the basis for employment or work decisions affecting such individual; and/or
 - Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

EEO/Non-Discrimination/Anti-Harassment Policy and Complaint Procedure

- Some Examples:
 - Inappropriate touching, such as rubbing or massaging someone's neck or shoulders or stroking someone's hair.
 - Coerced sexual acts.
 - Repeated telling of lewd, off-color, sexually-oriented comments or jokes.
 - Leering, staring in a sexual manner, stalking.
 - Displaying or otherwise sharing suggestive or sexually-explicit posters, calendars, photographs, graffiti, cartoons.
 - Unwanted or offensive letters or poems of a sexual nature.
 - Offensive e-mail, voice-mail or text messages of a sexual nature.
 - Repeated requests for dates after the individual has indicated that he or she is not interested.
 - Taking retaliatory action against an individual for discussing or making a sexual harassment complaint.

Policy for the Prevention and Response to Sex Discrimination, Sexual Harassment and Sexual Violence Against Students

- Policy with respect to sex discrimination, sexual harassment, and sexual violence against students
- Includes definitions of gender-based discrimination, sexual harassment, hostile environment, sexual misconduct, non-consensual sexual interactions, and retaliation relevant to the context of students
- Similar policies on cooperation/obstructing the process, alcohol and/or drug use amnesty, confidentiality and privacy, and reporting mechanisms



Recall - *Interim Policy and Procedures* controls in cases involving sexual harassment when there is overlap with this policy

Student Bill of Rights

All students have the right to:

- Make a report to local law enforcement and/or state police;
- Have disclosures of domestic violence, dating violence, stalking, and sexual assault treated seriously;
- Make a decision about whether or not to disclose a crime or violation and participate in the judicial or conduct process and/or criminal justice process free from pressure by CSHL;
- Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard;
- Be treated with dignity and to receive from CSHL courteous, fair, and respectful health care and counseling services, where available;
- Be free from any suggestion that the reporting individual is at fault when these crimes and violations are committed, or should have acted in a different manner to avoid such crimes or violations;
- Describe the incident to as few CSHL representatives as practicable and not be required to unnecessarily repeat a description of the incident;
- Be protected from retaliation by CSHL, any student, the accused and/or the respondent, and/or their friends, family and acquaintances within the jurisdiction of CSHL;
- Access to at least one level of appeal of a determination;
- Be accompanied by an advisor of choice who may assist and advise a reporting individual, accused, or respondent throughout the judicial or conduct process including during all meetings and hearings related to such process; and
- Exercise civil rights and practice of religion without interference by the investigative, criminal justice, or judicial or conduct process of CSHL.

Rights of Reporting Individuals

All reporting individuals have the right to:

- Notify campus security, local law enforcement, and/or state police;
- Have emergency access to the Title IX Coordinator or other appropriate official trained in interviewing victims of sexual assault who shall be available upon the first instance of disclosure by a reporting individual to provide information regarding options to proceed, and, where applicable, the importance of preserving evidence and obtaining a sexual assault forensic examination as soon as possible, and detailing that the criminal justice process utilizes different standards of proof and evidence and that any questions about whether a specific incident violated the penal law should be addressed to law enforcement or to the district attorney. Such official shall also explain whether he or she is authorized to offer the reporting individual confidentiality or privacy, and shall inform the reporting individual of other reporting options;
- Disclose confidentially the incident to the specific CSHL representatives who may offer
- confidentiality pursuant to applicable laws and can assist in obtaining services for reporting individuals;
- Disclose confidentially the incident and obtain services from the state or local government;
- Disclose the incident to CSHL representatives who can offer privacy or confidentiality, as appropriate, and can assist in obtaining resources for reporting individuals;
- File a report of sexual assault, domestic violence, dating violence, and/or stalking and the right to consult the Title IX Coordinator and other appropriate institution representatives for information and assistance. Reports shall be investigated in accordance with CSHL policy and a reporting individual's identity shall remain private at all times if said reporting individual wishes to maintain privacy;
- Disclose, if the accused is an employee of CSHL, the incident to CSHL's Human Resources Department or the right to request that a confidential or private employee assist in reporting to the Human Resources Department;
- Receive assistance from appropriate CSHL representatives in initiating legal proceedings in family court or civil court; and
- Withdraw a complaint or involvement from the CSHL process at any time.

Student Code of Conduct

- Purpose Behind the Student Code
 - Community Privilege and Accountability
 - Academic Excellence + Mutual Respect and Responsibility
- Application
 - All Students
 - Right to Investigate
 - Any and All Properties of CSHL
 - Internet or Other Electronic Means

Does This
Policy Cover
Off-Campus
Activity?

Student Code of Conduct

- Treatment of Laboratory Property and Funds
 - Utmost Respect and Care
 - Funds Used Properly, Ethically, and Responsibly
 - Lab Purposes ONLY
 - Avoid Wastefulness
- Computer Use Policy
 - All Use Requires Ethical Behavior
 - Info and Laboratory Property
 - Right to Restrict or Deny



Student Code of Conduct

- Academic Misconduct
 - Plagiarism
 - Cheating, Actual or Attempted
 - Submitting Work Multiple Times
 - Fabrication or Falsification

Student Code of Conduct

Violations of This Policy:

- Alcohol and Drugs
- Destruction of Property
- Discrimination and Harassment
- Firearms
- Endangering Self/Others
- Failure to Comply
- Fire Safety
- Guests and Visitors
- Hazing
- Inappropriate Behavior
- Misrepresentation
- Sexual Harassment and Misconduct
- Theft
- Unauthorized Access
- Violations of Law

Student Code of Conduct

- Consequences of Violations
 - Warning
 - Probation
 - Loss of Privileges
 - Restitution
 - Relocation/Removal from Housing
 - Contact Restrictions
 - Suspension
 - Expulsion

CSHL Will Consider:

- Complainant
- Respondent
- Community



Putting It to the Test: Policy Implementation

Test Your Knowledge

1. A student comes to your office to tell you that they might be a victim of a sexual assault. Do you have a duty to report the incident?
 - A. Only if the students requests it
 - B. No, it is best for them to handle it on their own
 - C. Maybe, what day of the week is it?
 - D. Yes, always
 - E. No, the incident is none of your business

Test Your Knowledge

2. True or False: Reporting individuals do not have the right to report the incident to both CSHL and law enforcement; the incident can only be reported once.

- A. True
- B. False

Test Your Knowledge

3. Which of the following options are confidential resources for advice and information after a potential sexual misconduct incident?
- A. Submitting an Incident Report Form at <https://incident.cshl.edu/>
 - B. Calling Katherine Raftery (VP, HR and Title IX Coordinator)
 - C. The SightMD Center for Health and Wellness
 - D. The Safe Center LI
 - E. Both C and D

Test Your Knowledge

4. True or False: Informal Resolution is available for all types of alleged sexual misconduct.

- A. True
- B. False

Test Your Knowledge

5. Violations of the *Interim Policy and Procedures for Allegations of Title IX Sexual Harassment* could include which of the following:
- A. Restitution payments and additional penalties
 - B. Loss of the right to participate in Laboratory activities
 - C. Corporal punishment

Test Your Knowledge

6. A student, found responsible for violating the Policy, can appeal a finding if:

- A. They do not like the outcome
- B. They provide new information they knew about but did not present at the hearing
- C. They believe the Investigator had a conflict of interest
- D. The previous appeal went against them



Questions?