# **Implementation of Title IX Working Group Recommendations: Progress Report**Updated September 2018

**Note:** New information since the previous update appears in red.

COMPLETED	Recommendation has been fully implemented <b>OR</b>
	<ul> <li>Recommendation required some actions at the beginning of the year and other actions that are year-long; the former have been completed and the latter are ongoing</li> </ul>
INITIATED	Implementation work has begun
SCHEDULED	Recommendation involves activities that were intended to be implemented at a later date

#### 1. Title IX Team and Leadership

	Recommendation	Action steps completed to date
1a	Hire a full-time Title IX case manager  COMPLETED	<ul> <li>Kari Hohn, a former staff member of the Minnesota Coalition Against Sexual Assault, was hired as Title IX Case Manager on September 19, 2016.</li> <li>In February 2018, the responsibilities of case manager were incorporated into a new full-time Title IX Coordinator position, and Ms. Hohn was appointed to that new position. The college's Title IX policy was updated to reflect the merged full-time position (Section I.B.1), and the job description for the Title IX Coordinator is posted on the HR website (password-protected) with all other St. Olaf positions.</li> <li>The Vice President for Mission, who served as the college's previous Title IX Coordinator, remains a member of the Title IX Team.</li> </ul>
1b	Establish multi-disciplinary core team comprised of selected members of the Title IX team for responding to reports of sexual misconduct (see also 3b, 3d)  COMPLETED	<ul> <li>Multi-disciplinary Core (COordinated REsponse) Team has been established:         <ul> <li>Title IX Coordinator</li> <li>Associate Dean of Students for Residence Life</li> <li>Director of Public Safety</li> </ul> </li> <li>The college's General Counsel provides ongoing legal advice and consultation.</li> <li>Intake and communication checklist has been prepared and is being used per Recommendation 3d</li> <li>Description of CORE Team composition and responsibilities has been incorporated in the college's Title IX policy (Section I.B.2) and is posted on the Title IX website.</li> </ul>

1c	Publicly report the frequency and types of training completed by Title IX team members (see also 8c)  COMPLETED	Document describing training of Title IX team members has been posted on the Title IX website
1d	Enhance the visibility and accessibility of Title IX team members  COMPLETED	<ul> <li>Professional biographies, including Title IX responsibilities, have been added to the information about each team member on the Title IX Team page</li> <li>A Title IX link has been added to the student portal and the faculty/staff portal.</li> <li>A Title IX Quick Guide with key links and a list of team members is now being provided annually to every new and returning student</li> <li>Additional Title IX poster with photos of team members has been developed and distributed in numerous locations on campus</li> <li>The Title IX Team's practices now include in-person presentations and conversations with students, faculty and staff throughout the academic year, focusing on Title IX engagement in meetings that community members are already having (e.g., academic department or staff division meetings, student orientations, etc.).</li> </ul>

#### 2. Title IX Policy Revisions

	Recommendation	Steps initiated or completed to date
2a	Revise Title IX policy and training to improve understanding of affirmative consent COMPLETED	<ul> <li>Definitions of affirmative consent, as well as of coercion and incapacitation, have been clarified and expanded in the college's Title IX policy (Section III.C.11). Specific examples of words and actions that do and do not indicate consent have been added.</li> <li>Wellness Center Peer Educators were trained on college's enhanced definition of affirmative consent prior to Week One</li> <li>Enhanced definition of affirmative consent was incorporated into first-year Bystander Intervention Training</li> </ul>
2b	Update definitions of selected terms in college policy  COMPLETED	New definitions have been incorporated into the college's <u>Title IX policy</u> (Section III.C)

2c	Revise Title IX policy language to be gender- neutral COMPLETED	The entire policy has been re-written in gender-neutral language
2d	Make the process of reporting less burdensome for Reporting Parties (see also 3f)  COMPLETED	<ul> <li>Expanded language about respectful treatment of individuals during the investigation and determination process has been added to college policy</li> <li>Online form that permits anonymous reporting has been developed and posted in several locations, including the Title IX home page, the Report to the College page, and the new Information for Visitors page</li> <li>Provisions for anonymous reporting in Section IV.C.4 of the college's Title IX policy have been revised</li> </ul>
<b>2e</b>	Strengthen and explain the connection between the college's Title IX policy and policy prohibiting consensual relations between employees and students  COMPLETED	<ul> <li>A substantially expanded description of the college's consensual relations policy and its relationship to the college's Title IX policy has been incorporated into the college's <u>Title IX policy</u> (Section III.C.2)</li> </ul>

## 3. Title IX Reporting and Intake Process

	Recommendation	Steps initiated or completed to date
3a	Establish a protocol for consistent communications with Reporting Party and Responding Party  COMPLETED	<ul> <li>Protocol has been developed and is being used</li> <li>Extensive printed information packets have been developed for both Reporting Parties and Responding Parties, addressing a wide variety of topics such as support resources, the role of advisors, and the provisions of no-contact orders</li> </ul>
3b	Establish multi-disciplinary core team comprised of selected members of the Title IX team for responding to reports of sexual misconduct (see also 1b)  COMPLETED	<ul> <li>Multi-disciplinary CORE (COordinated Response) Team has been established:         <ul> <li>Title IX Coordinator</li> <li>Associate Dean of Students for Residence Life</li> <li>Director of Public Safety</li> <li>The college's General Counsel provides ongoing legal advice and consultation.</li> </ul> </li> <li>Intake and communication checklist has been prepared and is being used per Recommendation 3d</li> <li>Description of CORE Team composition and responsibilities has been incorporated in the college's Title IX</li> </ul>

		policy (Section I.B.2) and is posted on the Title IX website.
3c	Engage Title IX team in initial assessment of every report of sexual misconduct COMPLETED	<ul> <li>Multidisciplinary Core Team serves this function on behalf of the full Title IX team</li> <li>Description of CORE Team composition and responsibilities has been incorporated in the college's <u>Title IX policy</u> (Section I.B.2)</li> </ul>
3d	Develop intake checklist for consistent communication with both Reporting Party and Responding Party  COMPLETED	Intake and communication checklist has been developed and is being used
3e	Develop protocols for consolidated, consistent, and coordinated documentation of information and records for every report received  COMPLETED	<ul> <li>Protocols have been developed</li> <li>Comprehensive case management software has been purchased and is being implemented</li> </ul>
3f	Create a clear and user-friendly mechanism for anonymous reporting of sexual harassment or misconduct (see also 2d)  COMPLETED	A new <u>online form</u> that permits anonymous reporting has been developed and posted in several locations on the college website, including the <u>Title IX home page</u> , the <u>Report to the College</u> page, and the new <u>Information for Visitors</u> page
3g	Improve clarity and transparency of information about how to report sexual harassment or misconduct (see also 8d) COMPLETED	<ul> <li>The provisions of college policy with respect to reporting have been further expanded and clarified (Section IV)</li> <li>A link to the new online reporting form is included in the new college policy provisions (Section IV.C.4)</li> <li>The Report to the College page has been revised and simplified</li> <li>A button linking directly to the new online reporting form has been placed on the Title IX home page</li> <li>A Title IX Quick Guide with key links and information about reporting has been provided to every new and returning student, and this practice will be continued annually.</li> <li>Flow charts summarizing the key features of the reporting and initial support process have been developed and posted on the Title IX website.</li> </ul>

#### 4. Title IX Investigation and Determination Process

	Recommendation	Steps initiated or completed to date
4a	Continue to use trained and experienced investigators, relying primarily but not exclusively on external investigators  COMPLETED	<ul> <li>College policy (Section VI.C.4) has been revised to state that "In most instances the College will retain an experienced external investigator to conduct the investigation."</li> <li>Several prospective new St. Olaf investigators have been identified and have completed initial training</li> </ul>
4b	Expand current policy provision for Reporting Party and Responding Party to review and respond to a preliminary report of the investigation by including option to respond orally COMPLETED	Revised provision has been incorporated into Section VI.C. 10 of college policy
4c	Revise college policy so that investigators are also charged with making the determination of responsibility  COMPLETED	Revised provision has been incorporated into Section VI.C.11 of college policy
4d	Revise college policy to permit both Reporting Party and Responding Party to challenge the findings of the investigation with respect to the determination of responsibility COMPLETED	Revised provision has been incorporated into Section VI.C.13 of college policy
4e	Create adjudication panel to determine sanctions and review appeals  COMPLETED	<ul> <li>The Vice President for Student Life, the Dean of Students, and other staff have been designated as available adjudication panel members</li> <li>Revised provision has been incorporated into Section VI.C.12 of college policy</li> </ul>
4f	Continue to allow both parties to include advisor of choice in any investigative meeting or disciplinary proceeding COMPLETED	<ul> <li>Information about advisors in college policy (Section VI.A.5) has been amplified</li> <li>Description of provisions for advisors and information about individuals who can serve as advisors is included in information folders for Reporting Parties and Responding Parties</li> </ul>
4g	Review and evaluate changes to the Investigation and Determination process at the end of the 2016-17 academic year COMPLETED	<ul> <li>The entire college policy was reorganized and updated by the Title IX Coordinator, the Title IX Case Manager, and the General Counsel, and reviewed by the Title IX Team, in Summer 2017.</li> <li>In Summer 2018, the entire policy was updated again by the Title IX Coordinator and the General Counsel, and affirmed by the Title IX Team, to reflect new guidance from the federal Office for Civil Rights.</li> </ul>

#### 5. Sanctioning in Title IX Cases

	Recommendation	Steps initiated or completed to date
5a	Establish sanctioning guiding principles  COMPLETED	Guiding principles for sanctioning have been incorporated into <u>college policy</u> (Section VI.C.15)
5b	Articulate factors to be considered when applying guiding principles to determination of sanctions in specific cases  COMPLETED	Factors to be considered in determining sanctions have been amplified and incorporated into college policy (Section VI.C.15)
5c	Release aggregate data on Title IX sanctions every three years (see also 6e)  SCHEDULED	The sanctioning data will be added to the new <u>Statistics</u> page on the Title IX website, which provides aggregate data on incidents of sexual misconduct at St. Olaf and comparative data with other institutions. The first three-year report will be posted in Fall 2019.

## 6. Accountability for Policy Implementation and Revision

	Recommendation	Steps initiated or completed to date
6a	COMPLETED  COMPLETED	The HEDS Sexual Assault Campus Climate Survey was administered on campus February 20 - March 6, 2017, with a 29% response rate. Complete results, including comparison with aggregate results from other participating institutions and a response to the findings by the Title IX Team, were provided to the college in Spring 2018, along with a summary of key findings, and plans for acting on results.
6b	Appoint and develop charge for faculty/staff/student Title IX Advisory Group COMPLETED	<ul> <li>Advisory Group members have been appointed annually beginning in Fall 2016 and issue annual reports based on feedback gathered in a wide variety of ways from individuals who have engaged the college's Title IX processes in some way. The Advisory Group's membership and charge is posted on the Title IX website and updated each year to reflect new members.</li> <li>A link that enables anyone to provide feedback on their experience at any time, with the option to do so</li> </ul>

6c	Conduct annual (or more frequent) review of Title IX policy  COMPLETED	anonymously, has been posted in several places on the Title IX website.  The Advisory Group posts a report to the community with a summary of its findings annually on the college's Title IX website.  Review is ongoing in light of working group report and new state statute
6d	Maintain a website enabling members of the community to provide feedback and seek information COMPLETED	<ul> <li>Working Group page currently remains available on the <u>Title IX website</u></li> <li>Advisory Group page created in Spring 2017 remains on the Title IX website and includes <u>online feedback forms</u></li> </ul>
6e	Develop and implement annual communication plan concerning Title IX data and activities  COMPLETED	<ul> <li>An annual communication plan prepared by the Title IX Coordinator in consultation with Marketing and Communications has been adopted by the Title IX Team.</li> <li>Many of the communication strategies outlined in the plan were already in effect. This includes the new Statistics page on the Title IX website, with aggregate data on incidents of sexual misconduct at St. Olaf and comparative data with other institutions.</li> </ul>
6f	Publicize training completed by Title IX members and training/development opportunities for students and employees COMPLETED	Document describing <u>training</u> of Title IX team members has been posted on the Title IX website <u>and</u> is <u>updated</u> regularly.

# 7. Inclusivity and Accessibility of the Title IX Policy

	Recommendation	Steps initiated or completed to date
7a	Hire a Gender and Sexuality Center Coordinator COMPLETED	This responsibility has been incorporated into the position of Assistant Director of Student Activities for Wellness (now the Assistant Director for Wellness, Gender, and Sexuality).
7b	Revise Title IX policy, website, training materials, and other written documents to reflect gender-neutral language  COMPLETED	College policy, website, and written documents have been reviewed and, where needed, revised to reflect genderneutral language
7c	Train Title IX team and other individuals with heightened responsibility on implicit bias COMPLETED	<ul> <li>Implicit bias resources were used during search process for case manager</li> <li>Two implicit bias workshops were held, one on May 24, 2017 and a second one on September 21, 2017, led by Dr. Anne</li> </ul>

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		Phibbs, founder and president of Strategic Diversity Initiatives. More than 100 faculty and staff attended one of these two workshops, including all Title IX team members, all members of the President's Leadership Team, many other senior leaders, and heads of faculty and staff search committees.
7d	Conduct periodic campus climate survey (see also 6a)  COMPLETED	The HEDS Sexual Assault Campus Climate Survey was administered on campus February 20 - March 6, 2017, with a 29% response rate. Complete results, including comparison with aggregate results from other participating institutions and a response to the findings by the Title IX Team, were provided to the college in Fall 2017, along with a summary of key findings, and plans for acting on results.
7e	Revise the Title IX policy and accompanying information to reflect plain language COMPLETED	College policy, website, and written documents have been reviewed and, where needed, revised to reflect genderneutral language     Flowcharts summarizing (and distinguishing between) the reporting and resolution processes have been posted on the Title IX website

# 8. Availability and Quality of Support Services

	Recommendation	Steps initiated or completed to date
8a	Retain a professional coordinator for the Sexual Assault Resource Network (SARN)  COMPLETED	<ul> <li>A member of the Boe House Counseling Center staff has been appointed to serve as the St. Olaf staff supervisor for SARN.</li> <li>The HOPE Center's professional volunteer coordinator, who also provides the 40-hour training required of advocates, serves as the community coordinator for SARN.</li> <li>The Assistant Director for Wellness, Gender, and Sexuality has also been assigned to serve as a consultant for SARN's educational programming.</li> </ul>
8b	Assign responsibility for connecting Reporting Parties and Responding Parties with on- and off-campus resources to the new Title IX case manager COMPLETED	Kari Hohn, a former staff member of the Minnesota Coalition Against Sexual Assault, was hired as Title IX Case Manager on September 19, 2016.

		<ul> <li>In February 2018, the responsibilities of case manager were incorporated into a new full-time Title IX Coordinator position, and Ms. Hohn was appointed to that new position. The college's Title IX policy was updated to reflect the merged full-time position (Section I.B.1), and the job description for the Title IX Coordinator is posted on the HR website (password-protected) with all other St. Olaf positions.</li> <li>The Vice President for Mission, who served as the college's previous Title IX Coordinator, remains a member of the Title IX Team</li> </ul>
8c	Evaluate and enhance trauma-informed training of confidential resources  COMPLETED	<ul> <li>St. Olaf's General Counsel, co-founder of trainED professional development programs on legal issues in higher education, provided training for confidential resources in College Ministry, Counseling Center, and Health Services in September 2016</li> <li>Training was provided to SARN advocates and educators in October 2016 and was repeated in Fall 2017</li> <li>Annual trainings for all Confidential Resources are now incorporated into every Fall semester.</li> </ul>
8d	Provide Title IX brochures with information about reporting and resources to all students and employees (see also 3g)  COMPLETED	<ul> <li>A <u>Title IX Quick Guide</u> with key links and a list of team members has been posted on the Title IX website</li> <li>Beginning in Fall 2016, a physical copy of the Guide is provided to all new and returning students when they arrive on campus to begin the academic year, and is also provided to all employees.</li> <li>The Quick Guide design was upgraded by a graphic designer</li> </ul>

## 9. Training for the Title IX Team and St. Olaf Community

	Recommendation	Steps initiated or completed to date
9a	Centralize Title IX training and education	An Education and Prevention
	through the Title IX Coordinator or a	Subcommittee of the Title IX Team, led
	designee (see also 6f)	by the Title IX Coordinator, has been
	COMPLETED	established. It includes the Dean of
		Students, the Assistant Dean of Students
		for Programming and Assessment, the
		Assistant Director for Wellness, Gender,

		and Sexuality, a College Pastor, the Vice President for Mission, and students
9b	Create additional training for first-years beyond the online <i>Think About It</i> program, focusing on the first six weeks of college <b>COMPLETED</b>	<ul> <li>100% of incoming first-year and transfer students complete <i>Think About It</i> prior to registration, providing a foundation for subsequent training</li> <li>Bystander training and other interactive opportunities are provided for all new students during Week One</li> <li>SARN talks in all residence halls are held in the early fall</li> <li>The Education and Prevention Subcommittee also plans programming for students on an ongoing basis</li> </ul>
9c	Expand and enhance annual training for all employees and students, including more opportunities for inclusive and in-person training  COMPLETED	<ul> <li>St. Olaf's General Counsel, co-founder of trainED professional development programs on legal issues in higher education, provides in-person training for employees throughout the academic year</li> <li>The Education and Prevention Subcommittee meets every other week to plan ongoing events and trainings throughout the academic year</li> <li>Faculty/staff training on "What to do when a student tells you about sexual misconduct" led by Title IX Team was held on Tuesday, January 17, repeated on Tuesday, February 21, and repeated again for the entire faculty at the Faculty Meeting of April 6, 2017. Similar opportunities were provided in 2017-18.</li> </ul>

## 10. Ensuring Adequate Communication and Transparency in the Title IX Process

	Recommendation	Steps initiated or completed to date
10a	Provide clear and transparent information about how to make a report, access resources, and seek information about college processes (see also 3g and 8d)  COMPLETED	<ul> <li>Title IX posters have been developed and posted in key locations around campus; more are in preparation</li> <li>A <u>Title IX Quick Guide</u> with key links and a list of team members has been posted on the Title IX website and distributed to all new and returning students</li> <li>The Report to the College page has been revised and simplified</li> <li>A button linking directly to the new online reporting form has been placed on the Title IX home page</li> </ul>

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		<ul> <li><u>Flowcharts</u> summarizing (and distinguishing between) the reporting</li> </ul>
		and resolution processes have been
		posted on the Title IX website
10h	Fatablish a mustagal for as rejetant	·
10b	Establish a protocol for consistent	See information in 3a
	communications with Reporting Party and	
	Responding Party (reiteration of 3a)	
	COMPLETED	
<b>10c</b>	Publish results of campus climate survey (see	The <u>HEDS Sexual Assault Campus Climate</u>
	also 6a and 7d)	<u>Survey</u> was administered on campus
	COMPLETED	February 20 - March 6, 2017, with a 29%
		response rate. <u>Complete results</u> ,
		including comparison with aggregate
		results from other participating
		institutions and a response to the
		findings by the Title IX Team, were
		provided to the college in Fall 2017,
		along with a summary of key findings,
		and plans for acting on results.
10d	Develop and implement annual	See information in 6e
	communication plan concerning Title IX data	
	and activities (reiteration of 6e)	
	COMPLETED	
<b>10e</b>	Revise the Title IX policy and accompanying	See information in 7e
	information to reflect plain language	
	(reiteration of 7e)	
	COMPLETED	
10f	Maintain a website enabling members of the	See information in 6d
	community to provide feedback and seek	
	information (reiteration of 6d)	
	COMPLETED	
10g	Publicly report the frequency and types of	See information in 1c
	training completed by Title IX team	
	members (reiteration of 1c)	
	COMPLETED	
10h	Enhance the visibility and accessibility of	See information in 1d
	Title IX team members (reiteration of 1d)	
	COMPLETED	
10i	Create and develop charge for faculty/ staff/	See information in 6b
	student Title IX Advisory Group (reiteration	
	of 6b)	
	COMPLETED	
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