

Implementation of Title IX Working Group Recommendations: Progress Report

Updated April 25, 2017

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

COMPLETED	<ul style="list-style-type: none"> Recommendation has been fully implemented OR 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
INITIATED	<ul style="list-style-type: none"> Implementation work has begun
SCHEDULED	<ul style="list-style-type: none"> Recommendation involves end-of-year activities so cannot be implemented until later in the year

1. Title IX Team and Leadership

	Recommendation	Action steps completed to date
1a	Hire a full-time Title IX case manager COMPLETED	<ul style="list-style-type: none"> Kari Ogradowski, most recently with the Minnesota Coalition Against Sexual Assault, was hired and began her new position on September 19. Case Manager job description is now posted on the HR website with all other St. Olaf positions Description of Case Manager responsibilities has been incorporated in the college's Title IX policy (Section II.d.ii), in the Title IX Quick Guide now distributed to all students at the beginning of the year, and on Title IX posters distributed around campus.
1b	Establish multi-disciplinary core team comprised of selected members of the Title IX team for responding to reports of sexual misconduct (<i>see also 3b, 3d</i>) COMPLETED	<ul style="list-style-type: none"> Multi-disciplinary Core (COordinated REsponse) Team has been established: <ul style="list-style-type: none"> Title IX Coordinator Associate Dean of Students for Residence Life Director of Public Safety Title IX Case Manager The college's General Counsel provides ongoing legal advice and consultation. Intake and communication checklist has been prepared and is being used per Recommendation 3d Description of CORE Team composition and responsibilities has been incorporated in the college's Title IX policy (Section II.d.iii)
1c	Publicly report the frequency and types of training completed by Title IX team members (<i>see also 8c</i>) COMPLETED	<ul style="list-style-type: none"> New document describing training of Title IX team members has been posted on the Title IX website

1d	<p>Enhance the visibility and accessibility of Title IX team members</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> • Professional biographies, including Title IX responsibilities, have been added to the information about each team member on the Title IX Team page • A Title IX link has been added to the footer of every page on the college website • A Title IX link has been added to the top of the page for the student portal, the faculty/staff portal, and the parent portal • 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 • Additional Title IX poster with photos of team members has been developed and distributed in numerous locations on campus • Several Title IX team members were introduced in person to entering class during Week One • Both a student-focused event and an employee-focused event were held on Thursday, October 27 (just prior to Halloween, a period of elevated risk for students). • 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.
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2. Title IX Policy Revisions

	Recommendation	Steps initiated or completed to date
2a	<p>Revise Title IX policy and training to improve understanding of affirmative consent</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> • Definitions of <i>affirmative consent</i>, as well as of <i>coercion</i> and <i>incapacitation</i>, have been clarified and expanded in the college’s Title IX policy (Section II.e.xi-xiii) • Wellness Center Peer Educators were trained on college’s enhanced definition of affirmative consent prior to Week One • Enhanced definition of affirmative consent was incorporated into first-year

		Bystander Intervention Training
2b	Update definitions of selected terms in college policy COMPLETED	<ul style="list-style-type: none"> New definitions have been incorporated into the college's Title IX policy (Section II.e)
2c	Revise Title IX policy language to be gender-neutral COMPLETED	<ul style="list-style-type: none"> The entire policy has been re-written in gender-neutral language, including both the provisions prohibiting discrimination, harassment, and other misconduct, and the provisions for the investigation and determination process The new Title IX Advisory Group and the new Coordinator for Gender and Sexuality will be asked to review and provide feedback on the revised language
2d	Make the process of reporting less burdensome for Reporting Parties (<i>see also 3f</i>) COMPLETED	<ul style="list-style-type: none"> Expanded language about respectful treatment of individuals during the investigation and determination process has been added to college policy Online form that permits anonymous reporting has been developed and posted in several locations, including the Title IX home page and the Report to the College page Provisions for anonymous reporting in Section II.f.ii.4. of the college's policy on prohibited conduct have been revised
2e	Strengthen and explain the connection between the college's Title IX policy and policy prohibiting consensual relations between employees and students COMPLETED	<ul style="list-style-type: none"> 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 Title IX policy (Section II.e.ii)

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 style="list-style-type: none"> Protocol has been developed and is being used 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
3b	Establish multi-disciplinary core team comprised of selected members of the Title IX team for responding to reports of sexual	<ul style="list-style-type: none"> Multi-disciplinary CORE (COordinated Response) Team has been established: <ul style="list-style-type: none"> Title IX Coordinator

	<p>misconduct (<i>see also 1b</i>)</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ○ Associate Dean of Students for Residence Life ○ Director of Public Safety ○ Title IX Case Manager <p>The college's General Counsel provides ongoing legal advice and consultation.</p> <ul style="list-style-type: none"> ● Intake and communication checklist has been prepared and is being used per Recommendation 3d ● Description of CORE Team composition and responsibilities has been incorporated in the college's Title IX policy (Section II.d.iii)
3c	<p>Engage Title IX team in initial assessment of every report of sexual misconduct</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ● Multidisciplinary Core Team serves this function on behalf of the full Title IX team ● Description of CORE Team composition and responsibilities has been incorporated in the college's Title IX policy (Section II.d.iii)
3d	<p>Develop intake checklist for consistent communication with both Reporting Party and Responding Party</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ● Intake and communication checklist has been developed and is being used
3e	<p>Develop protocols for consolidated, consistent, and coordinated documentation of information and records for every report received</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ● Protocols have been developed ● Options for comprehensive case management software are being investigated
3f	<p>Create a clear and user-friendly mechanism for anonymous reporting of sexual harassment or misconduct (<i>see also 2d</i>)</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ● A new online form that permits anonymous reporting has been developed and posted in several locations on the college website, including the Title IX home page and the Report to the College page
3g	<p>Improve clarity and transparency of information about how to report sexual harassment or misconduct (<i>see also 8d</i>)</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> ● The provisions of college policy with respect to reporting have been substantially expanded and clarified (Section II.f) ● A link to the new online reporting form is included in the new college policy provisions (Section II.f.4) ● The Report to the College page has been revised and simplified ● A button linking directly to the new online reporting form has been placed on the Title IX home page ● A Title IX Quick Guide with key links and information about reporting has been

		<p>provided to every new and returning student, and this practice will be continued annually.</p> <ul style="list-style-type: none"> • Flow charts summarizing the key features of the reporting and initial support process have been developed and posted on the Title IX website.
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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 style="list-style-type: none"> • College policy (Section IX.a.i) has been revised to state that “In most instances the College will retain an experienced external investigator to conduct the investigation.” • Several prospective new St. Olaf investigators have been identified and have completed initial training
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	<ul style="list-style-type: none"> • Revised provision has been incorporated into the policy governing the investigation and determination process (Section IX.a.x)
4c	Revise college policy so that investigators are also charged with making the determination of responsibility COMPLETED	<ul style="list-style-type: none"> • Revised provision has been incorporated into the policy governing the investigation and determination process (Section IX.a.xi)
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	<ul style="list-style-type: none"> • Revised provision has been incorporated into the policy governing the investigation and determination process (Section IX.a.xiii)
4e	Create adjudication panel to determine sanctions and review appeals COMPLETED	<ul style="list-style-type: none"> • The Vice President for Student Life and the Dean of Students have been designated as the adjudication panel • Revised provision has been incorporated into the policy governing the investigation and determination process (Section IX.a.xii)
4f	Continue to allow both parties to include advisor of choice in any investigative meeting or disciplinary proceeding COMPLETED	<ul style="list-style-type: none"> • Information about advisors in the policy governing the investigation and determination process (Section VIII) has been amplified • 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
4g	Review and evaluate changes to the Investigation and Determination process at the end of the 2016-17 academic year SCHEDULED	<ul style="list-style-type: none"> Members of Core Team have met with Advisory Group to explain new reporting, investigation and determination, appeal, and sanctioning processes

5. Sanctioning in Title IX Cases

	Recommendation	Steps initiated or completed to date
5a	Establish sanctioning guiding principles COMPLETED	<ul style="list-style-type: none"> Guiding principles for sanctioning have been incorporated into the policy governing the investigation and determination process (Section IX.a.xv)
5b	Articulate factors to be considered when applying guiding principles to determination of sanctions in specific cases COMPLETED	<ul style="list-style-type: none"> Factors to be considered in determining sanctions have been amplified and incorporated into the policy governing the investigation and determination process (Section IX.a.xv)
5c	Release aggregate data on Title IX sanctions every three years (<i>see also 6e</i>) INITIATED	<ul style="list-style-type: none"> The sanctioning data will be added to the new Statistics page on the Title IX website, which provides aggregate data on incidents of sexual misconduct at St. Olaf and comparative data with other institutions.

6. Accountability for Policy Implementation and Revision

	Recommendation	Steps initiated or completed to date
6a	Conduct periodic campus climate survey COMPLETED	<ul style="list-style-type: none"> 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, will be provided to the college by the survey administrators in late summer or early fall 2017.
6b	Appoint and develop charge for faculty/staff/student Title IX Advisory Group COMPLETED	<ul style="list-style-type: none"> Charge has been developed Advisory Group members have been appointed: <ul style="list-style-type: none"> Student Government Association President (Advisory Group chair) A SARN Co-Chair

		<ul style="list-style-type: none"> ○ A student representative from the Gay, Lesbian, or Whatever! (GLOW) student group ○ A faculty member of Student Life Committee ○ A College Pastor ○ Assistant Director of Student Activities for Wellness ○ Athletics Senior Woman Administrator ● Advisory Group has established a website on the Title IX website, including online feedback forms, and is currently gathering confidential feedback from students who have participated as either a reporting party or a responding party in any of the college's revised Title IX processes (reporting and support, investigation, adjudication, sanctioning).
6c	Conduct annual (or more frequent) review of Title IX policy COMPLETED	<ul style="list-style-type: none"> ● 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 style="list-style-type: none"> ● Working Group page currently remains available on the Title IX website ● Website has been created for the Title IX Advisory Group
6e	Develop and implement annual communication plan concerning Title IX data and activities INITIATED	<ul style="list-style-type: none"> ● The Vice President for Enrollment and College Relations and the Chief Marketing Officer have been identified as partners in the development and implementation of the plan ● A new Statistics page has been added to the Title IX website, with aggregate data on incidents of sexual misconduct at St. Olaf and comparative data with other institutions.
6f	Publicize training completed by Title IX members and training/development opportunities for students and employees COMPLETED	<ul style="list-style-type: none"> ● New document describing training of Title IX team members has been posted on the Title IX website

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	<ul style="list-style-type: none"> ● Sarah Joslyn has been appointed Coordinator for Gender and Sexuality

7b	Revise Title IX policy, website, training materials, and other written documents to reflect gender-neutral language INITIATED	<ul style="list-style-type: none"> • College policy has been revised to reflect gender-neutral language
7c	Train Title IX team and other individuals with heightened responsibility on implicit bias SCHEDULED	<ul style="list-style-type: none"> • Implicit bias resources were used during search process for case manager • Initial implicit bias workshop has been scheduled for Wednesday, May 24, to be led by Dr. Anne Phibbs, Director of Education for the University of Minnesota Office for Equity and Diversity. More than 60 faculty and staff will attend the May workshop, 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. The workshop will be repeated for a second cohort of participants in late September, and a “train the trainers” workshop will be offered later in the fall so the training can be sustained internally.
7d	Conduct periodic campus climate survey (<i>see also 6a</i>) COMPLETED	<ul style="list-style-type: none"> • 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, will be provided to the college by the survey administrators in late summer or early fall 2017.
7e	Revise the Title IX policy and accompanying information to reflect plain language COMPLETED	<ul style="list-style-type: none"> • College policy has been revised to reflect plain language • Flowcharts summarizing the reporting, investigation and determination, appeal, and sanctioning 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 style="list-style-type: none"> • Erin Fredrick-Gray, a member of the Boe House Counseling Center staff who is a licensed psychologist and a certified

		<p>sexual assault advocate, has been appointed to serve as the St. Olaf staff supervisor for SARN.</p> <ul style="list-style-type: none"> • The HOPE Center's professional volunteer coordinator, who also provides the 40-hour training required of advocates, serves as the community coordinator for SARN. • The Assistant Director of Student Activities for Wellness has also been assigned to serve as a consultant for SARN's educational programming.
8b	<p>Assign responsibility for connecting Reporting Parties and Responding Parties with on- and off-campus resources to the new Title IX case manager</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> • Kari Ogradowski, most recently with the Minnesota Coalition Against Sexual Assault, was hired and began her new position on September 19. • Case Manager job description is now posted on the HR website with all other St. Olaf positions • Description of Case Manager responsibilities has been incorporated in the college's Title IX policy (Section II.d.ii)
8c	<p>Evaluate and enhance trauma-informed training of confidential resources</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> • St. Olaf's General Counsel, co-founder of <i>trainED</i> 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 • Training was provided to SARN advocates and educators in October 2016
8d	<p>Provide Title IX brochures with information about reporting and resources to all students and employees (<i>see also 3g</i>)</p> <p>COMPLETED</p>	<ul style="list-style-type: none"> • A Title IX Quick Guide with key links and a list of team members has been posted on the Title IX website • A physical copy of the Guide was waiting on the desks of all new and returning students when they arrived on campus • The Quick Guide design was upgraded by a graphic designer

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

	Recommendation	Steps initiated or completed to date
9a	<p>Centralize Title IX training and education through the Title IX Coordinator or a designee (<i>see also 6f</i>)</p>	<ul style="list-style-type: none"> • The Dean of Students, the Vice President for Student Life, the Director of Wellness Programs, the Vice President for Human

	COMPLETED	Resources, the Gender and Sexuality Coordinator, and the Title IX Case Manager will plan and facilitate training and education
9b	Create additional training for first-years beyond the online <i>Think About It</i> program, focusing on the first six weeks of college COMPLETED	<ul style="list-style-type: none"> • 100% of incoming first-year and transfer students completed <i>Think About It</i> prior to registration, providing a foundation for subsequent training • “What’s It All About” interactive theater was provided for all new students during Week One • Bystander training was provided for all new students during Week One • SARN talks in all residence halls were held in the early fall • New students who enrolled at the college in Interim and Spring 2017 have completed <i>Think About It</i>
9c	Expand and enhance annual training for all employees and students, including more opportunities for inclusive and in-person training COMPLETED	<ul style="list-style-type: none"> • The college has contracted with the providers of the student training <i>Think About It</i>, for “refresher” training so it can be available on an unlimited basis to all students and employees • St. Olaf’s new General Counsel, co-founder of <i>trainED</i> professional development programs on legal issues in higher education, is providing in-person training for employees throughout the academic year • 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.

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 (<i>see also 3g and 8d</i>) COMPLETED	<ul style="list-style-type: none"> Title IX posters have been developed and posted in key locations around campus; more are in preparation A Title IX Quick Guide 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 The Report to the College page has been revised and simplified A button linking directly to the new online reporting form has been placed on the Title IX home page Flowcharts summarizing the reporting, investigation and determination, appeal, and sanctioning processes have been posted on the Title IX website
10b	Establish a protocol for consistent communications with Reporting Party and Responding Party (<i>reiteration of 3a</i>) COMPLETED	<ul style="list-style-type: none"> See information in 3a
10c	Publish results of campus climate survey (<i>see also 6a and 7d</i>) INITIATED	<ul style="list-style-type: none"> 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, will be provided to the college by the survey administrators in late summer or early fall 2017; posting will occur as soon as possible following receipt
10d	Develop and implement annual communication plan concerning Title IX data and activities (<i>reiteration of 6e</i>) INITIATED	<ul style="list-style-type: none"> See information in 6e
10e	Revise the Title IX policy and accompanying information to reflect plain language (<i>reiteration of 7e</i>) COMPLETED	<ul style="list-style-type: none"> See information in 7e
10f	Maintain a website enabling members of the community to provide feedback and seek information (<i>reiteration of 6d</i>) COMPLETED	<ul style="list-style-type: none"> See information in 6d
10g	Publicly report the frequency and types of training completed by Title IX team members (<i>reiteration of 1c</i>) COMPLETED	<ul style="list-style-type: none"> See information in 1c
10h	Enhance the visibility and accessibility of	<ul style="list-style-type: none"> See information in 1d

	Title IX team members (<i>reiteration of 1d</i>) COMPLETED	
10i	Create and develop charge for faculty/ staff/ student Title IX Advisory Group (<i>reiteration of 6b</i>) COMPLETED	<ul style="list-style-type: none">• See information in 6b