



**Title IX Oversight and Advisory Board
Review and Recommendations**

Final Report

June 2016

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Introduction and Overview of the Board's Work

The Title IX Oversight and Advisory Board, as charged by President Paxson in Fall 2015, reviews and makes recommendations concerning Brown University's policies, programs, and initiatives designed to address sexual and gender-based harassment, sexual violence, and relationship and interpersonal violence and stalking. Included in our charge is the task of conducting a review every three years on Brown's progress in implementing the recommendations issued by the 2014-2015 Sexual Assault Task Force (SATF) in their Final Report (Appendix A).

This is the first review conducted by the Title IX Oversight and Advisory Board (OAB). It outlines the work has been done, and offers some recommendations based on the experiences and feedback of staff, students, and faculty who worked to implement the many Title IX related changes following the hiring of the Title IX Program Officer Amanda Walsh and the subsequent creation of the Title IX Office in May 2015. Given that this first review was conducted during a significant transition period regarding the University's approach to Title IX policies and processes, the Title IX OAB felt it was necessary to offer recommendations in addition to our progress check so as to guide future Title IX work at Brown.

The Title IX OAB membership approached the 2015-2016 academic year with two goals: To conduct as thorough a review as possible of the implementation of SATF recommendations and to assess the effects of the numerous Title IX related changes on the Brown community. We met eight times over the course of the academic year to discuss our priorities and devise a method for collecting feedback from the various offices that have Title IX responsibilities. We quickly realized that it would be helpful to have Title IX Program Officer Amanda Walsh attend our meetings, and she did so for the rest of the year. We also invited Dr. Unab Kahn to discuss the initiative undertaken by Health Services to streamline and clarify which hospitals will provide students with medical treatment following an assault. Additionally, we invited Vice President for Academic Advancement, Diversity and Inclusion, Liza Cariaga-Lo, and Director of Diversity and Inclusion, Wendy McRae-Owoeye, to a meeting dedicated to discussing feedback from OAB student representatives to the Staff and Faculty online training module Workplace Answers.

When it became clear that we would need to issue some specific recommendations related to the Title IX Office, we created a sub-committee that met twice during the spring semester. At these meetings, the subcommittee discussed recommendations offered by Amanda Walsh based on her first year leading the Title IX Office, and the substantial feedback she received from students, staff, and faculty on a number of issues related to Title IX policies and procedures. Based on these meetings, the subcommittee presented a list of discussion items to the full Title IX OAB and the membership agreed to the recommendations outlined in this review.

During the spring semester, the OAB also received funds from the President's Office to hire a student researcher, and one of the undergraduate student representatives, Anastasiya Gorodilova, became our Title IX Oversight and Advisory Board Student Researcher and Liaison. In this position, Anastasiya did extensive outreach both in person and via survey to collect student feedback on the recent changes. She also created and distributed a progress check form to all of the campus offices tasked with Title IX responsibilities (Appendix B). Our graduate student representative, Maggie Unverzagt Goddard, also

collected graduate student feedback via a survey. Lastly, we worked closely with the Title IX Implementation Committee to further assess progress related to the implementation of the SATF recommendations.

This report will first outline the Sexual Assault Task Force Recommendations that have been addressed thus far, and will then relate feedback on these efforts from across the campus community. Based on this feedback as well as numerous Title IX OAB discussions, the report concludes with a set of recommendations to be considered as soon as possible. Given that the next full review will occur in three years, the Board hopes that the recommendations will be carefully considered and, ultimately, accepted. This report was prepared by Sara Matthiesen and Anastasiya Gorodilova in consultation with the entire Title IX OAB.

Implementation of SATF Recommendations

Title IX OAB found that the majority of the SATF recommendations have been implemented (See Appendix C). Significant items include:

- The creation of new processes for [faculty](#) and [staff](#), respectively. These processes mirror the process for [students](#), reflecting the SATF recommendation that University policies and processes be centralized and unified wherever possible.
- The hiring of an internal investigator. The Title IX Office hired Jessica Katz in November 2015 as a full time internal investigator, reflecting the SATF acknowledgement that internal and external investigators offer strengths. With a full time investigator in house, the Title IX Office is better able to resolve complaints in a timely manner.
- The hiring of an additional Sexual Harassment and Assault Resources and Education (SHARE) Advocate in Health Promotion. Elliot Ruggles started in the spring 2016, reflecting the SATF recommendation that additional staff be added to the SHARE program.
- Standard protocol for administration of medical exams related to sexual violence was implemented and made [widely accessible](#). Dr. Unab Kahn worked closely with local hospitals to clarify where students can go following an assault.
- The roll out of Workplace Answers to all faculty and staff, with consequences for not participating. This reflects the SATF recommendation regarding mandatory training. The training itself however, must be re-evaluated and strengthened to better suit the Brown community, and include stronger training about intersectional nature of violence. The method of distribution to medical faculty also needs to be improved.
- Title IX components at all student orientations, including undergraduate, graduate, and medical students. This reflects the SATF recommendation that all orientations include a Title IX primer.
- The designation and announcement of responsible employees to all students, staff, and faculty. This reflects the SATF recommendation that Brown designate responsible employees per the Office of Civil Rights' guidance, as well as define confidential resources.
- The addition of resources and training on Interpersonal Violence to the Medical School curriculum. The Title IX Office is working with the Medical School Curriculum Committee to add resources during years 1-3. This reflects the SATF recommendation that a more robust IPV unit be added to the current curriculum.

Above all, the recommendations related to training were most difficult to assess and are described by the Title IX OAB as “ongoing.” This is in part, because trainings need to be offered annually if not more regularly, so there will not be a point at which this task is “complete.” However, here “ongoing” also means that there is more work required to institutionalize training programs across the University. The SATF Final Report refers to training related to prevention and education, responsible employees, workplace conduct, medical providers, graduate and medical students--to name a few--and requires that all of these trainings address dynamics of power and oppression. These various trainings are housed in different offices and centers on campus, and it is clear that there is a need for more coordination between offices. Such coordination is absent due to the lack of capacity of the many offices involved. This issue reflects the SATF recommendation that more resources be added to offices charged with training responsibilities.

Feedback Related to SATF Recommendations

This feedback was gathered from online progress check forms, online surveys, and in person focus group meetings with undergraduate student groups and communities. The following represents general themes identified across these sources. They are discussed in this section, and distilled into a list in the following section ‘Recommendations from Community Feedback.’”

From Staff:

The Title IX OAB distributed a progress check form to offices tasked with Title IX responsibilities. (See Appendix D). The majority of these offices reported that they were able to smoothly implement the SATF recommendations specific to their role within the University. While every office said that they were able to implement the recommendations with their current resources, many also noted that if their Title IX related workloads increased they would need more resources to meet this demand. The need for more resources was also noted by offices that provide direct support services to students.

Some offices reported lingering questions regarding reporting obligations of responsible employees, including a lack of clarity about what making a report to the Title IX Office entails. There still exists confusion about responsible employee designation in student mentoring programs, such as the ALANA and MAPS mentoring program. This reflects the Title IX OAB’s discussions about responsible employees and the confusion that remains in the community, and in part informed our recommendation (below) related to this topic.

The BWell Office of Health Promotions that houses the SHARE Advocates underlined the need for more resources. They recognized that there is still a fair amount of misinformation and confusion around campus about the role of the SHARE office and the ways in which the Advocates can be reached. As such they intend to continue outreach efforts and provide opportunity for hours on location at different spaces on campus to increase visibility and access. It was noted that the SHARE office space - on the third floor of Health Services - is not sufficiently accessible for all students. The SHARE advocates met with Student and Employee Accessibility Services (SEAS) staff and spoke about holding meetings in more physically accessible office spaces, but this is a conversation that needs to continue.

The SHARE Advocates office is tasked with the tri-fold responsibility of survivor support, cutting-edge work in prevention and outreach (such as utilizing the latest research to engage in curriculum development), and systems advocacy within and outside of Brown. This office needs more resources, including increased resources for graphic design and publication and distribution of updated information and materials about Title IX policies. The SHARE Advocates also run the Sexual Assault Peer Educators (SAPE) program, which they noted also needs more resources. SAPEs are mainly unpaid student volunteers, who create and provide programming for student groups across campus (including Greek and Athletic communities) about bystander intervention and prevention education. They are also currently developing an entirely new curriculum. Compensating more students for more of their work on the SAPE curriculum development and undergraduate orientation programs would allow the office to move forward more quickly and comprehensively and allow the students to devote more time to this crucial project.

It was also noted that re-evaluating protocols that require a Department of Public Safety (DPS) Officer to respond to all EMS dispatches is recommended. Survivors with marginalized identities - particularly survivors of color - may not feel safe around DPS officers. Survivors also have concerns about confidentiality. The only way for a student to get university transportation to a local hospital is through EMS, which can only respond if dispatched through 411 (which brings a DPS officer to the scene too). EMS Students think this is a threat to their confidentiality as they may not have made the decision to talk to DPS or the Deans. Because staff cannot transport students in personal vehicles due to liability issues. Uber has been used a few times this past semester, but this option is not ideal.

Staff feedback also noted that increased and continued training for all faculty and staff is necessary, and that the trainings must adequately address the fact that gender-based violence often intersects with other marginalized identities. It was also noted that in undergoing these trainings, there is a need for more mindfulness of the fact that administrators and faculty undergoing trainings may be survivors as well. As such, appropriate warnings and support are needed during these sessions. Increased communication between different offices and departments is also critical.

From Undergraduate Students:

On the Accessibility of Information and Feedback Mechanisms

Most students reported that information about Title IX resources and policies is still not distributed widely enough. Many noted that extensive mass emails are not the best method of informing the campus about changes and policies, and that while sufficient information now exists, it is not simplified or accessible. While the graphic posters (Appendix E) created to simplify the Title IX complaint process and the designations of confidential resources/ responsible employees have been well-received, they have not been widely distributed and most students interviewed had not seen them.

Students also noted the absence of opportunities to give feedback. Many were pleased to have the opportunity to speak with Anastasiya in person and offer experiences and suggestions, and underlined that targeted in person outreach was a productive way to gather feedback. When the next Title IX OAB report is being prepared, a student representative should therefore do similar extensive outreach to student groups and communities. Many also recommended an anonymous online feedback mechanism, that could

be housed on the Title IX Office website to give people the opportunity to report feedback at any time. Student athletes also suggested that questions about Title IX policies should be added to the mandatory end of year survey for athletes. This survey is currently completed by the entire athletics community, and would be a ready-made method of gathering annual feedback.

Although many students are encouraged by the changes and progress made, there is a sentiment on campus (even noted in some of the staff progress check form responses) that past harms that occurred prior to these efforts have not been addressed by the University. As much of the student community still feels distrust, healing spaces and transparent communications are necessary for these changes to be well-received and utilized.

On Student Responsible Employee Designations

As of the Fall 2015 semester, many student advising roles have been designated as responsible employees which requires them to report all known details of a possible Title IX violation to the Title IX Office. Meiklejohn peer advisors for first years were newly designated as responsible employees, while the Residential Advisors were newly informed of this job responsibility and of its enforcement. Residential Advisors include Residential Peer Leaders (RPLs), Women's Peer Counselors (WPCs), Minority Peer Counselors (MPCs), and Community Assistants (CAs). The main concern with this designation is that it significantly decreases survivor support networks for those who feel uncomfortable confiding in their student advisors because of their duty to report. As the only confidential resources on campus (discussed in the next section) are overwhelmed and/or distrusted by many student communities, the fear is that this designation - if not explained correctly - might create a culture of silence.

All students reported that the way in which the newly enforced responsible employee designations were presented to the community in the Fall 2015 semester created confusion, fear and concern. This underlines the necessity for thoughtfulness and transparency in the introduction of any new Title IX-related policies. Many students noted that once they better understood the designation and the way it was applied on Brown's campus, they were more comfortable with it, but that the damage had already been done and distrust was widespread. One Meiklejohn dropped out of the program because of the responsible employee designation and the way it was introduced. Particularly noteworthy is the fact that the new designation for Meiklejohns and newly enforced designation for RPLs, MPCs, WPCs, and CAs was made after the advisors had been hired and contracts had been signed. This effectively blindsided students with an additional burden and responsibility they had not signed up for. This lack of transparency and communication must be avoided in the future to build the trust of the student community, and to prevent confusion and discomfort.

Every responsible employee designated student interviewed reported a need for more training and support to handle this role. There is still confusion about when advisors are responsible, what exactly happens when the information is reported, and what happens if they do not comply. Increased consistency, transparency, and communication is needed to strengthen this designation and these positions. It was also noted numerous times that the language of "reporting" causes distrust and fear. Despite the fact that this designation is referred to as "responsible employee," many at Brown use the more familiar phrase "mandated reporter" which implies much more aggressive intervention than actually occurs when reports

reach the Title IX Office. It is recommended that alternative titles are discussed to better communicate the role and decrease distrust and fear in the student community.

The designation of responsible employee is a significant responsibility, one that requires institutional support. Students with this designation reported needing more training on how to approach their responsibilities with advisees. Women's Peer Counselors (WPCs) reported being overwhelmed and nearly burned out within the first few weeks due to advising survivors. They noted that all student residential advisors, MPCs, RPLs, and CAs, need increased responsible employee training to more equitably spread this burden. MPCs also noted that training must better consider the ways in which violence is often intersectional and targets multiple marginalized identities.

When consulted, the leadership of the Meiklejohn program--the only student position with a responsible employee designation that is also unpaid- requested that the designation remain in place for a few more semesters before re-evaluating its effectiveness with concerted outreach and feedback collection before the next Title IX OAB report.

On the Accessibility of Resources

Confidential Resources

All students who gave feedback for this report underlined that there were not enough trusted confidential resources on campus. The only confidential resources on campus are the two SHARE Advocates,¹ the Chaplain's Office, and Counselling and Psychological Services (CAPS). The need for confidential resources has been underlined this year due to the newly enforced designations of responsible employee for many students, staff, and faculty.

Students reported that for many individuals, particularly those with multiple marginalized identities, there are few to no accessible and trusted confidential resources on campus. Many are not comfortable going to the Chaplain's Office unless they identify as religious. Many other students, particularly those with intersecting marginalized identities, reported that they do not feel comfortable going to CAPS. Even among the students and student communities that reported being comfortable going to CAPS, all reported that the extensive waiting time for an appointment presented a significant barrier to accessing this resource. Students felt that capacity at CAPS--both in terms of timely availability of appointments and sensitivity to the intersectional dynamics of gender-based trauma--should be increased.

This means that for some students the only trusted confidential resources on campus are the two SHARE Advocates, who are overwhelmed with a multitude of responsibilities. With this in mind and based on the most unanimous feedback from all student groups and online surveys, the Title IX OAB strongly recommends that three additional confidential resources be added to the three main identity centers on

¹ SHARE advocates provide free and confidential emotional support and advocacy to students impacted by sexual assault, sexual and/or gender-based harassment, domestic/dating violence, relational abuse, or stalking at any point in their lifetime. They also provide support to secondary survivors who are supporting loved ones through these issues. SHARE advocates are housed in the BWell Health Promotions Office and also coordinate education and outreach efforts around these issues on campus and support student educators in Bystander Intervention and Prevention efforts.

campus - the Brown Center for Students of Color, the Sarah Doyle Women's Center, and the LGBTQ Center. This will provide directed support for students with multiple marginalized identities, will increase the number of confidential resources on campus and thus offset some of the concerns arising from the responsible employee designations, and diffuse some of the burden on the SHARE Advocates.

It was also noted that the SHARE Advocate offices are not sufficiently physically accessible, preventing some students from accessing this resource. The distance between the Student Conduct Deans' offices in Grad Center and the Title IX Office and CAPS was also noted. If a student is presented with a 'No Contact Order' in Grad Center for example, and then need psychological support from either the Title IX Office or CAPS, they have to be led across campus in order to access either of these resources. While it is understood that neither of these space and location issues can be fixed forthwith, they remain a barrier to accessibility of resource access that can be ignored.

Sexual Assault Peer Educators

Sexual Assault Peer Educators (SAPes) are students who conduct workshops about issues pertaining to gender-based violence such as the importance of bystander intervention. While some workshops are presented to student groups on request, the majority are mandatory workshops for the Greek and Athletics communities. SAPes are overworked with the requirement of providing dozens of workshops every semester, putting in hours of unpaid labour. Without them, the University would not be in full compliance with federal Title IX regulations and requirements put forth by many of the Greek organizations on campus. As such, it is critical to recognize the time and work that SAPes put into this program with some compensation. As most of these peer educators are unpaid volunteers, this limits their capacity for training and the development of training materials. The University must do more to support SAPes as they are a crucial mechanism of sexual assault training and information that the University relies on.

It was recommended that other student groups also receive more support and training about Title IX related issues. For example, it was noted that student organization leaders are given no guidance or training on how to handle a No Contact Order between members within one organization. As such, increased resources need to be created to better explain Title IX policies and support students that are impacted by them.

The Title IX Office and Athletics

Conversations with student athletes centered primarily on capacity within both Athletics and the Title IX Office. Specifically, students felt strongly that additional resources in Athletics and the Title IX Office dedicated specifically to achieving gender equity as it pertains to sports teams would be a positive development. Currently, designated staff within Athletics are responsible for monitoring gender equity, but students felt that additional resources in the Title IX Office would formally extend Title IX oversight to this additional area of the Brown community. For example, if capacity of the Title IX Office was increased, it would provide students an alternative avenue for assessing claims of inequity. The Title IX Office currently serves this function for students, staff, and faculty who have experienced individual instances of gender-based harassment and discrimination. Extending this resource to Title IX-related issues in Athletics would require collaboration between staff in Athletics and the Title IX Office, as well as additional positions.

From Graduate and Medical Students:

The graduate students who responded to the survey reported many of the same sentiments gathered by the SATF during the 2014-2015 academic year. The dominant theme in these responses was lack of awareness of recent changes related to Title IX and the sense that the University's confidential resources are not accessible to graduate students. Graduate students noted that weekend hours at CAPS was a positive development, but that a confidential resource dedicated to graduate and medical students is still necessary. Many of the SATF recommendations specific to graduate and medical students responded to the general challenge of adequately serving these populations at a majority-undergraduate institution, but some recommendations--such as an additional position in Health Promotion dedicated to graduate and medical student support and outreach--have yet to be implemented. There is a postdoctoral position in the Title IX Office dedicated to graduate and medical students, but it is a part time position that is not a confidential resource, and so it is limited in its ability to fill this gap.

Highlighting their dual role as professional educators and students themselves, graduate students indicated the need for Title IX training as it pertains to teaching assistant positions as well as Title IX resources for those students that conduct fieldwork abroad. It was suggested that the Title IX Office and the Sheridan Center could collaborate on creating a training specifically for teaching assistants. The Title IX Office could also create resources that outline what Title IX resources are available to students who experience incidents when conducting research off campus.

Medical students continued to express the need for a variety of services that speak to their multiple roles as students, professionals, and health providers. This means providing direct services to medical students as students while also providing more opportunities for how to navigate disclosures of gender-based violence from patients. Students expressed an interest in increased outreach and programming from the Title IX Office to improve overall awareness about the office and recent policy changes. The structure of medical school curriculum presents challenges for outreach to be effective in both pre-clinical and clinical years. There was an interest in improving the teaching of topics such as intimate partner violence and sexual assault to better define the role of the medical student in providing care for these patients and to provide better support for students who have difficult patient encounters. The Title IX Office, the SHARE Office, and the Medical School Curriculum Faculty are currently working together to increase training and support in these areas. Additionally, concerns were raised about how to improve mechanisms for reporting and addressing Title IX issues during clinical training, given the wide range of environments in which students work and the relationship between the medical school and its partner hospitals. Overall, there was concern about the slower speed at which the medical school specific changes in the SATF recommendations were implemented compared with the undergraduate campus. This may be in part due to a change in the medical school's Deputy Title IX Coordinator in the fall semester.

We also heard from medical students and faculty about the lack of clarity around reporting mechanisms and confidential resources. Many medical students did not know about CAPS much less the SHARE Office. Given that medical students are even further removed from University resources because of the location of the medical school, it was suggested that more confidential resources be placed in the medical school.

For any and all initiatives related to serving graduate and medical students, it is imperative that they adequately speak to students' dual roles as students and professionals at Brown University. Trainings and resources should speak to the fact that graduate and medical students are more likely to encounter instances of gender-based harassment and discrimination that mirrors harassment one might find in the workplace rather than a college campus. The University must continue to brainstorm ways of protecting graduate and medical students' professional careers throughout their participation in University grievance processes. Additionally, resources and trainings should acknowledge the ways that gender-based harassment often intersects with other types of discrimination, putting graduate and medical students that are already marginalized at Brown University such as students of color, international students, and queer and transgender students, at greater risk for incidents that significantly hinder their professional and educational success.

From Faculty:

The Title IX OAB did not seek faculty feedback to the same extent that it sought insights from staff responsible for Title IX implementation and students. However, as mentioned in the following recommendations, various board members had heard from many faculty members about the lack of clarity around responsible employees and reporting protocols. We know that this lack of clarity continues to make faculty uneasy about what to do if a student discloses to them. The SHARE Office recently created a training to provide more support on this topic. The Title IX OAB reiterates the point made repeatedly in the SATF Final Report about the importance of ongoing training available to responsible employees around Title IX procedures as well as supporting both complainants and respondents who might also be your students.

Recommendations Based on Community Feedback

Based on the feedback outlined in the preceding two sections, the following recommendations have been distilled and compiled.

- 1) More targeted and accessible methods of information dissemination to the student community must be identified and implemented.
- 2) Regular feedback mechanisms must be instituted - e.g. on the Title IX Office website.
- 3) Transparency must be a priority in the introduction of any new policies - evidenced by the confusion and concern arising from the responsible employee designations.
- 4) More training and support for responsible employees must be implemented. (e.g. increased responsible employee training for student residential advisors -RPLs, WPCs, MPCs, CAs).
- 5) The administration should consider alternative titles/ descriptors to "reporting" required of responsible employees
- 6) At the time of feedback collection for the next Title IX OAB report, the board should re-evaluate the responsible employee designation of Meiklejohn peer advisors.
- 7) The University should consult with the directors of the Brown Center for Students of Color, the Sarah Doyle Women's Center, and the LGBTQ Center about their respective staffing needs to assess if adding confidential resources to each of these centers would increase their capacity to serve underrepresented students.

- 8) In cooperation with Student and Employee Accessibility Services (SEAS) the offices involved should evaluate the physical accessibility of the SHARE Advocates office and consider the distance between the SHARE Advocate office, the Title IX office, the Student Conduct Deans' offices in Grad Center, and CAPS.
- 9) Increase resources should be made available to further the work of the SHARE office, including identifying ways to better support and compensate SAPEs..
- 10) Increase resources should be made available to the Title IX Office to include dedicated monitoring of Title IX compliance in the Athletics Department.
- 11) Training available for faculty and staff must be increased and improved to better incorporate intersectionality and the ways it affects sexual violence and the experiences of individuals with multiple marginalized identities. The method of distribution of the training modules to medical faculty must be improved.
- 12) The Graduate and Medical Schools should work in collaboration with the Title IX Office to increase outreach and resources for graduate and medical school students.
- 13) Continue to monitor workload related to Title IX incidents so as to ensure offices that are at capacity do not become overwhelmed in the event the work increases as more and more people become familiar with the new policies and procedures. This includes keeping note of services available to staff who have experienced incidents of gender-based harassment and discrimination as well as services specific to supporting respondents.

Additional Title IX OAB Recommendations

Because the SATF recommendations were issued so recently, the Title IX OAB membership saw an opportunity in this first review report. Mainly, we felt that we should make a concerted effort to assess the impact of the recommendations now that have been fully implemented. To that end, the Title IX OAB worked closely with Amanda Walsh to identify key areas in addition to those outlined above in need of further deliberation. As the Title IX Program Officer, Amanda Walsh is responsible for overseeing many of the Title IX changes, and best positioned to hear from community members about ongoing issues related to said changes. Based on the research done by the Title IX Office and the subcommittee, and following two Title IX OAB meetings, the board issues the following recommendations to President Paxson:

- 1) Change the name of the Title IX Office to Office of Title IX and Gender Equity: Resources and Reporting Options for Sexual Harassment, Assault, and Gender-Discrimination. This recommendation is made in hopes of increasing accessibility of the Title IX Office and with the acknowledgement that many students may not know what Title IX means. The name change also reflects an awareness that Title IX's prominence in the American news cycle will eventually wane, and that relying on its current visibility would be shortsighted.
- 2) Afford the Title IX Program Officer greater flexibility in deciding which cases are assigned to an internal vs. external investigator as long as the office provides written rationale for each case. After close to a full academic year of processing complaints, the Title IX Office requested greater flexibility in how cases are assigned. The Title IX OAB supports the Title IX Office's request that cases be evaluated based on complexity of the facts, capacity and expertise of the internal investigator, potential for conflict of interest, and students' academic situations.

- 3) Make all faculty responsible employees as long as such a change is accompanied by an increase in confidential resources. One of the most consistent concerns that we heard from students, staff, and faculty was the lack of clarity regarding responsible employees. Both the subcommittee and the Title IX OAB discussed the pros and cons of making all faculty responsible employees at great length. Inasmuch as Brown's policy describes responsible employees as "those who have significant responsibility for the welfare of Students or Employees," the Title IX OAB felt hard pressed to identify a role where faculty did not meet this definition, and concluded that making all faculty responsible will greatly clarify the responsible employee designation for both students and faculty. However, we are also aware that doing so may take away an important resource, particularly for underrepresented students who often depend on faculty mentors more heavily than University resources. In acknowledgement of this, the Title OAB strongly recommends an increase in confidential resources in spaces beyond CAPS, the Chaplain's Office, and the SHARE Office. This is in keeping with the SATF recommendations that additional resources be added to areas on campus that provide formal and informal student support. The Title IX OAB strongly recommends that the directors of the main identity centers be consulted about the possibility of placing a confidential resource in the Brown Center for Students of Color, the Sarah Doyle Women's Center, and the LGBTQ Center, respectively.

Addressing the Complexity of Bias and Discrimination

Beginning with discussions in the subcommittee meetings and informed by campus conversations surrounding the Diversity and Inclusion Action Plan (DIAP), the Title IX OAB also spent a great deal of time considering the need for grievance processes that adequately reflect the complexity of bias and discrimination. Specifically, we discussed the fact that discrimination on the basis of gender is often racialized. This illustrates what we know to be true about both lived experience and discrimination--that aspects of identity as well as structures of power are intersectional and mutually reinforcing; race, class, gender, ethnicity, nationality, religion, sexuality, ability, and other categories do not operate in isolation from one another. This truth is obscured by grievance structures that intentionally and unintentionally silo instances of discrimination by identity, such as sex discrimination. The Title IX OAB discussed the problem of artificially pulling apart *types* of discrimination--that are in actuality perpetrated and experienced simultaneously--in order to evaluate gender-based harassment and violence cases. For example, if sexual harassment is also racialized, should the incident go to the Title IX Office as a gender-based bias incident or Student Conduct as race-based bias incident? Should two parallel processes move forward in order to capture what is in actuality a specific harm?

The Title IX OAB acknowledges that responding to this issue is beyond the purview of the board, and needs to happen in collaboration with other stakeholders on campus, including, first and foremost, the Diversity and Inclusion Oversight Board. Therefore, rather than make a formal recommendation, we want to highlight the need for future work in this area. This is in keeping with community feedback to the DIAP that called for clearer mechanisms through which bias related grievances are addressed. If the University takes on this initiative, we encourage a consideration of how existing policies might be augmented (rather than replicated) in order to better address the multi-faced nature of discrimination.

Conclusion

The Title IX Oversight and Advisory Board is proud to report that the majority of the 2014-2015 SATF recommendations have been implemented. We hope that the recommendations made by this board, informed by a year of work and research, will be carefully considered and approved. As part of our charge, this board is tasked with releasing a review of progress every three years. We are proud to issue this first review, and we are confident that the board will continue to oversee progress in this important area of our shared endeavors of learning, working, and teaching at Brown. Although significant progress has been made, the project of addressing gender-based violence and discrimination at Brown and the ways in which it intersects with other marginalized identities is not complete. Continued feedback must be solicited from all corners of the campus (staff, faculty, students) to ensure that changes made are most impactful to the communities they are intended to benefit.

Appendices

Appendix A--[Sexual Assault Task Force Final Report](#)

Appendix B--Progress Check Sent to Staff

Appendix C--Title IX Implementation Committee Spreadsheet

Appendix D--Offices Contacted by Title IX OAB for Progress Check

Appendix E--Title IX Resources

Appendix B

The following questions were sent to staff specifically mentioned in the SATF Final recommendations and/or staff with significant Title IX responsibilities.

- 1) Department/Division
- 2) What Title IX responsibilities are housed within your office?
- 3) Who is responsible for oversight of Title IX implementation in your department/division?
- 4) What progress have you made in implementing Title IX policies assigned to your department? What is your timeline for further implementation?
- 5) Have you implemented mechanisms for feedback? How are you measuring success?
- 6) Please describe any positive and negative feedback that you have received, and the steps you are taking to address it.
- 7) What obstacles have you encountered in implementing the recommendations of the Sexual Assault Task Force report?
- 8) What changes, if any, have you made to the recommendations as you have implemented them?
- 9) What would better facilitate your implementation of the recommendations?
- 10) Can your office meet its responsibilities given its current resources? If not, what additional resources do you feel are necessary?
- 11) How confident are responsible employees in your department in their understanding of their responsibilities and their ability to carry out those responsibilities?
- 12) What efforts is your department making to decrease barriers to reporting for survivors with marginalized identities?
- 13) What efforts are being made to decrease barriers for graduate and medical students?
- 14) Is there anything else you would like to report and/or make this body aware of?

The following questions were sent to offices that the Title IX Board thought might have experience with Title IX implementation relevant to the Board's review.

- 1) Department
- 2) Please describe the role your office plays in addressing Title IX related issues.
- 3) Please give any feedback about your experience with the implementation of Title IX policies in your department/ at Brown.

Appendix C

SATF Final Report Recommendation	Responsible Office	Progress	Notes	Deadline
Non-Training Recommendations				
1. Implement a unified University Sexual and Gender-Based Harassment, Sexual Violence, Relationship and Interpersonal Violence and Stalking Policy.	Title IX Office, Office of General Counsel, President's Office, Corporation	Implemented		9/1/15
2. Establish Title IX Office with centralized responsibility and oversight for all matters related to sexual and gender-based violence.	President's Office	Implemented		6/1/15
3. Implement a unified University process for resolving Title IX complaints.	Title IX Office, Office of General Counsel, Provost's Office, Dean of the Faculty, Faculty Grievance Committee	Student Process Implemented Staff and Faculty Process In Progress	Due to the legal differences between students, staff, and faculty, it was not possible to implement a truly unified process. However, the Title IX Office worked closely with the FEC as well as graduate and medical students to create a process that had some level of transparency and accountability. The Title IX Office also worked closely with HR to implement a new staff process. Both of these processes are much closer to the new student process in that they have moved to a hybrid investigation/panel model.	3/1/16
4. Standard protocols for investigations conducted by investigators and internal University offices.	Title IX Office, General Counsel, Student Conduct, Public Safety	Implemented	The Title IX Office developed series of standards including an investigation report format followed by both internal and external investigators, a checklist for all witness, complainant and respondent interviews and a checklist to be read through at the beginning of each panel hearing.	
5. Standard protocol for administration of medical exams related to sexual violence should be developed and shared broadly to the campus.	Director of Health Services, Medical School	Implemented	Available on Health Promotion Website	9/1/15

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6. Establish list of local attorneys willing to represent, pro bono, complainants and/or respondents unable to afford legal counsel.	Title IX Office, General Counsel		When a complainant or respondent notifies the Title IX Office that they would like to be represented by pro bono counsel, the OGC contacts local attorneys who have expressed willingness to handle such cases. The OGC has met all student need this year.	
7. Establish Title IX oversight and advisory board of faculty, students and staff.	President's Office	Implemented		10/1/15
8. Create mechanism for tracking and reporting information to the campus and to oversight and advisory board.	Title IX Office, CIS	Implemented		9/1/15
9. Oversight and advisory board to conduct review of progress every three years, beginning in Spring 2016.	Oversight and Advisory Board	In Progress		5/1/16
10. Assessment of resources available across University to address sexual and gender-based violence and harassment.	Title IX Office, Vice President for Campus Life, Institutional Diversity	In Progress		
11. Available and transparent information about policies, process, resources remedial measures.	Title IX Office, OSL, Graduate School, Medical School	Partially Implemented/In progress	Hired a student graphic designer to create a series of resource materials and have made significant updates to the website. There is additional work that needs to be done to reach grad and med students, and we are working with the graduate school and the medical school to institutionalize various information distribution opportunities, such as orientation, first year courses, certificate programs.	
12. Mechanisms for feedback at various stages of reporting/complaint process as well as for services administered by campus resources	Title IX Office, Campus Resources (CAPS, Chaplains, SHARE Office, DPS, OSL)	In progress	Biweekly meetings with SHARE, CAPS, DPS and Title IX Office to review process and evaluate what is working or not. Discuss de-identified student feedback at these meetings. At the end of the year, SHARE advocates will survey client base for feedback on services. At recommendation of Oversight member, incorporation survey into follow up email for students. It is our goal to find additional ways to be implemented before the fall 2016.	ongoing

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13. Appoint senior officer to represent Brown on state wide task force in adult sexual assault.	President's Office	Implemented	Amanda Walsh appointed	6/1/15	
14. Staff in Health Promotion dedicated to grad and med student curriculum	Health Promotion	In progress	While HP has no staff dedicated for outreach to graduate and medical students, 2015-16 has seen an intentional increase in time spent in outreach to these student bodies. We will continue our needs assessment.		
15. Additional staff in SDWC, LGBTQ, BCSC, SEAS		In progress	This recommendation is dependent on the findings of the needs assessment (See Rec 10)		
16. Sexual Assault Information and Resources Network, resources to SDWC	Title IX Office, SDWC	In progress			
17. Growing (and compensating) list of advisers	Title IX Office	In progress	Due to the significant change to the role of advisers in the new process, many students have retained attorneys as advisers, which was not permitted prior to September 2015. The Title IX Investigator has continued to recruit advisers throughout the spring and will be conducting 2-3 trainings in June.		
18. Comprehensive needs assessment of Title IX Office	TBD	TBD			

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<p>19. Existing resources should conduct targeted outreach to graduate and medical school students to ensure they are aware University resources are available to them.</p>	<p>Campus resources (CAPS, SHARE Office, Chaplains, Ombuds, OSL)</p>	<p>In progress</p>	<p>While neither CAPS nor HP have staff dedicated to work exclusively with graduate and medical students, both offices continue to increase outreach efforts to meet the needs of these student bodies. To date, SHARE advocates have completed nine outreach programs, including three orientation sessions for graduate students (multidisciplinary panels on Title IX and survivor support), and six programs offered during the academic year for graduate students and medical students. The sexual assault response line (which is covered jointly by CAPS and SHARE advocates) is a 24/7 resource for students who have experienced sexual violence.</p>		
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SATF Final Report Recommendation	Responsible Office	Progress	Notes	Deadline
Training Recommendations				
20. Unified Training for all University personnel directly or indirectly involved in the Process.	Title IX Office	In Progress	Title IX Council - Developed and implemented a required (5) hour training curriculum. *See training spreadsheet for all trainings.	Ongoing
21. Mandatory participation in training for faculty, students, staff	Title IX Office, DOF, Medical School, Graduate School, Campus Life	In progress	Workplace Answers training rolled out in Fall 2015 for faculty and staff.	
22. Training at graduate school orientation	Title IX Office, Graduate School	Implemented		
23. Training at undergraduate orientation	Title IX Office, Health Promotion	In progress	Working group of students and HP staff are currently revamping the Class Meeting and unit meeting programming for Fall 2016. For fall orientation the initial meeting will be followed by unit meetings on consent. The new Class meeting is Brown-specific and focuses on issues perceived by Brown students. There is ongoing conversation about continuing Agent of Change. There will be training for RPLs prior to orientation on sexual assault response, gender norms and abuser dynamics. There was a mid-year presentation for transfer students and subsequent small group workshops on promoting a culture of consent. Three multidisciplinary panels on Title IX and survivor support were conducted for graduate school orientation.	

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24. Training at medical school orientation	Title IX Office, Medical School	In progress	SHARE is working with Title IX office to identify opportunities to incorporate training into Medical School orientation programming and at other times throughout the year. In 2015-16, SHARE has completed educational tabling, a workshop, and two panel discussions at the Medical School. There is an assembly presentation on Title IX resources and contacts scheduled for April 2016. The Medical School has confirmed that there will be room in the orientation schedule for a Title IX rights and resources presentation. We are working on logistics with Emily Green.	ongoing	
25. Training at school of public health orientation	Title IX Office, School Of Public Health	In progress	The Title IX Office presented at the public health orientation last year as part of their wellness session. Anticipate doing the same this year. The discussion focused on resources and reportion options, including a focused section on confidentiality and responsible employees.		
26. Online training for faculty, staff, undergraduates, medical students, graduate students.	Title IX Office, Human Resources, CIS, Medical School, Graduate School, Provost's Office	In progress	The Title IX Office is working with CIS to create a module for graduate students, and we are in conversation with people at the medical school about using this training for medical students as well. UG students did Agent of Change last year, but with the security issues, it remains unclear whether that is an option moving forward.		

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27. Development of education programs geared towards high risk communities	Health Promotion, Title IX Office	In progress	Health Promotion is revamping SAPE's bystander intervention and sexual violence prevention curriculum to be more sensitive and inclusive of at-risk populations. Modules from this new curriculum will be available Fall 2016 to SAPE educators. Health Promotion also offers a Masculinity 101 facilitated discussion series, and does ongoing programming with athletics and Greek houses. In addition, SHARE advocates are working with Center for Students of Color, Sarah Doyle Women's Center, SEAS and the LGBTQ Center to offer on-site open hours with SHARE advocates or co-sponsor programming.		
28. Development of in-person training opportunities for students, staff, and faculty	Title IX Office, Health Promotion	In progress	Development of Supporting Survivors @ Brown training curriculum. Revamp of SAPE curriculum to offer expanded programming. Health Promotion staff offered training for the Title IX Council on the impact of trauma, coercion dynamics, and gender norms. Throughout the 2015-2016 academic year, members of the Title IX Office, including deputy Title IX coordinators offered 35+ training opportunities for students, staff, and faculty. These opportunities included Staff Development Day, sessions at grad, undergrad, and public health orientations, new faculty orientation, all department chair luncheons, and RPL unit meetings.		

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29. Development of standardized curriculum training for graduate students	Title IX Office, Graduate School	In progress	The Title IX Office is working with CIS to create a module for graduate students. Once this is complete (anticipated completion by end of Summer 2016) we will strategize distribution platforms that allow us to reach the entire graduate student body.		
30. Development of mandatory module for doctoring course and introduction to clerkships course at med school	Title IX Office, Medical School	In progress	The Title IX Office is working with Lindsay Orchowski and the curriculum advisers at the Medical School to identify opportunities for increasing education and training around fielding disclosures as a provider and how to attend to one's own needs as a provider.		
31. Assurance that all training materials address issues of power, privilege, and oppression in the context of Title IX violations	Title IX Office, Health Promotion,	In progress	Revamping SAPE curriculum and revising promotional materials. All trainings offered by the SHARE office have included an intersectional lens to review power differentials and structural inequities and their relationship to sexual violence. This year, the Title IX Office has focused on how to address issues of power and privilege within the implementation of the updated process. For example, changing the role of the advisers, ensuring we are looking at "access" to counsel as advisers (vs. strictly looking at financial resources), using all gender language, etc. This will continue to be an ongoing process.		
32. How to pamphlet for faculty responding to disclosures	Title IX Office	In progress			

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<p>33. Unit on intimate partner violence incorporated into existing medical school curriculum</p>	<p>Title IX Office, Health Promotion, Medical School</p>	<p>Implemented</p>	<p>Workshop in Intimate Partner Violence offered as part of "Being Comfortable with Being Uncomfortable" series. Tabling on resources for IPV at the Medical School. SHARE office participated in an IPV workshop organized by a medical student and attended by 65 medical students. The Title IX Office has identified places in the first year wellness session, the 2nd year doctoring course, and the clerkships prep course to increase skills and training around IPV. Sara Matthiesen and Lindsay Orchowski are working with the curriculum advisers on these three areas.</p>		
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Appendix D

Offices Contacted by Title IX OAB for Progress Check

Student Conduct

Student Support Services

Ombuds Office

CAPS

Health Services

Health Promotion-SHARE Advocates

Dean of the College

Chaplain's Office

Office of General Counsel

Sarah Doyle Women's Center

LGBTQ Center

Brown Center for Students of Color

Residential Life

Graduate School

Medical School

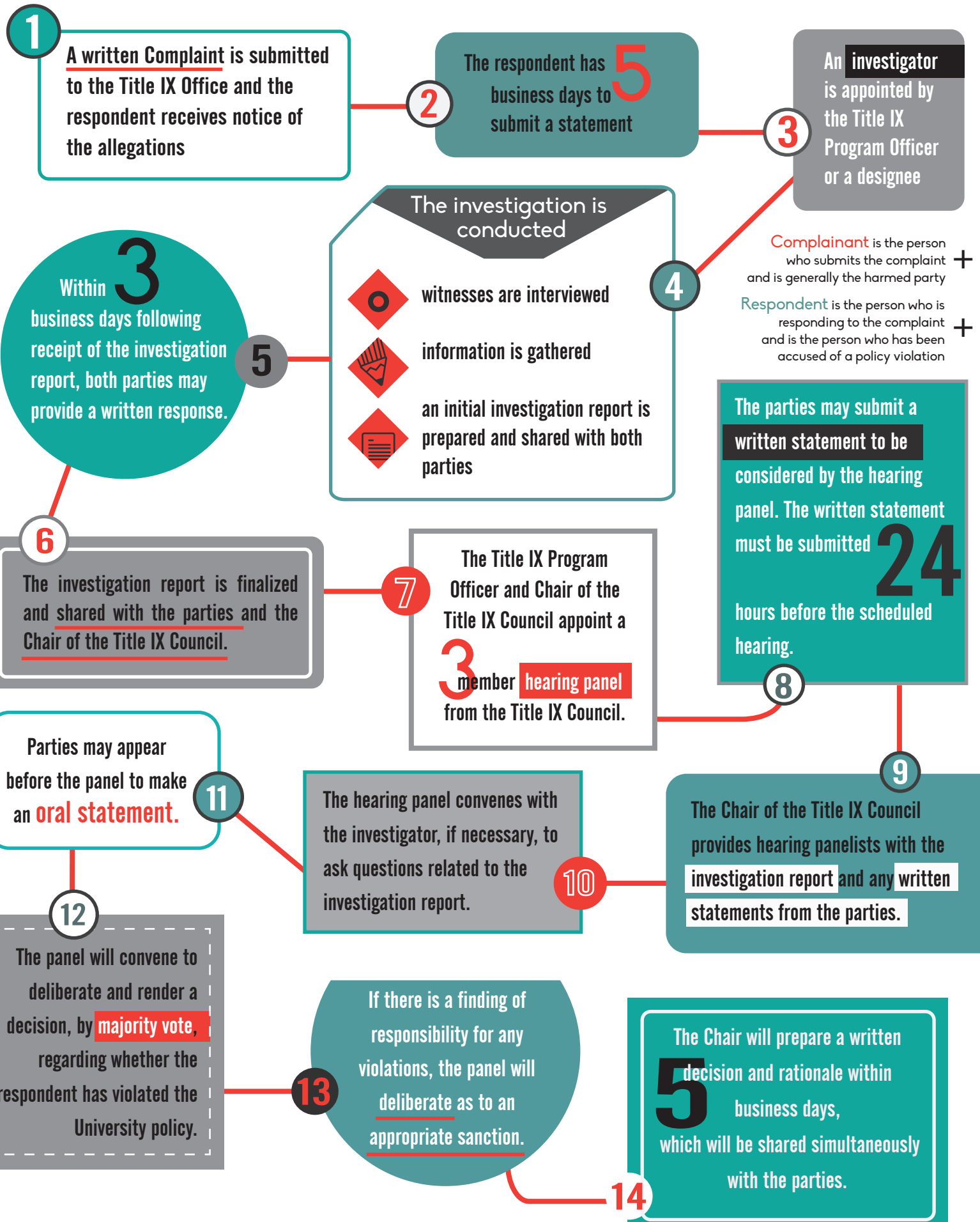
Athletics

Director of Diversity and Inclusion

Department of Public Safety

TITLE IX Complaint Process

In some cases, allegations may also be resolved **informally**



Complainant is the person who submits the complaint and is generally the harmed party +

Respondent is the person who is responding to the complaint and is the person who has been accused of a policy violation +



YOUR ROLE AS A RESPONSIBLE EMPLOYEE



AS A TRUSTED MENTOR, IT IS POSSIBLE STUDENTS WILL CONFIDE IN YOU ABOUT EXPERIENCES OF SEXUAL AND GENDER-BASED HARASSMENT AND ASSAULT.

Why do responsible employees have these obligations?

Responsible employees help to ensure students receive consistent and accurate information about campus resources. They also enable the University to track systemic patterns of discrimination.

BEFORE

BE PROACTIVE

Inform students about your obligation to report to the Title IX Office and available confidential resources.

Consider including a statement on your syllabus and/or discussing at the start of the course.

Refer to back for sample syllabus language

If a student comes to you -

DURING

LISTEN without judgment. The single most important way you can support someone is by listening.

EXPLAIN that you are a responsible employee and are required to share any known relevant details of a potential Title IX violation to the Title IX Office.

REMEMBER
You don't need all the information to make the report.

AFTER

CONNECT them to University resources. below

DIRECT information to the Title IX Office. You can share information over the phone, in person, or via email.

INFORM students that the request will be passed on to the Title IX Office - DOES NOT mean that the university requires students to take action that they don't want to

Students will receive an email from Title IX Office outlining all available resources + options

Available Resources

Confidential

Does NOT share any information with the Title IX office - protected by RI statelaw

- Sexual Assault Hotline** 401-863-6000
- SHARE Advocate** 401-863-2794
Alana_Sacks@brown.edu
- CAPS** 401-863-3476
Brown.edu/caps
- Chaplain's Office** 401-863-2344
Brown.edu/chaplains

Non-Confidential

Required to share information with Title IX

- SDWC Director** 401-863-2189
Gail_Cohee@brown.edu
- DPS** 401-863-3322
Campus_Safety@brown.edu
- Direct Reporting**
Title IX Office 401-863-2386
Amanda_Walsh@brown.edu

Sample Syllabus Language

“If you choose to tell me about an incident of gender-based violence, including sexual assault, dating violence, and stalking, or harassment that you experienced as a student, I am strongly encouraged* to direct the information to the Title IX Program Officer Amanda Walsh. If you tell me that you want to keep the details of the incident confidential, I will make sure to include that in the notice I send to the Title IX Office. If you would rather speak to a confidential resource, the following services are available to you on campus: [list out names and contact info].”

* If you are a responsible employee, you can replace “strongly encouraged” with “required.” If you are unsure about your obligations, contact the Title IX Office.

What is “Sexual Assault”?

Sexual assault is having or attempting to have sexual contact with another individual without consent.

Sexual contact includes:

(i.) Sexual intercourse (anal, oral, or vaginal), including penetration with a body part (e.g., penis, finger, hand, or tongue) or an object, or requiring another to penetrate himself or herself with a body part or an object, however slight; or

(ii.) Sexual touching, including, but not limited to, intentional contact with the breasts, buttocks, groin, genitals, or other intimate part of an individual’s body.



BROWN

Appendix E

RESOURCES

Confidential

Response Line (401) 863-6000

SHARE (401) 863-2794

Sexual Harassment and Assault
Resources & Education Advocate

CAPS (401) 863-3476

Counseling and Psychological Services

Chaplain (401) 863-2344

Medical Providers
in Health Services (401) 863-3953

EMS (401) 863-4111

Responsible

Title IX Office (401) 863-2216

Dean on Call (401) 863-3800

DPS (401) 863-4111
(emergency response)

OSL (401) 863-3800
Office of Student Life

Gail Cohee (401) 863-3402
*Director of the Sarah Doyle Women's Center
& Assistant Dean of the College*

What is a -

"Confidential" Employee

Does not share any information with the Title IX office - protected by RI statelaw

"Responsible" Employee

Required to share information with Title IX - DOES NOT mean that the university requires students to take action that they don't want to

TITLE

IX Gender
Equity

Contact Info

Phone 401-863-2216
titleixoffice@brown.edu