

Sexual Misconduct Officer Training

July 14, 2022

Agenda

Title IX Overview

TTIC's Investigation and Resolution Processes

“Severe, pervasive and objectively offensive”

Understanding the Impact of Force and/or Incapacitation on Consent

Assessing Evidence

Title IX

Overview

- ▶ Title IX of the Education Amendments of 1972 states that:

"No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

—United States Code Title 20 – Education §1681

Title IX

Title IX Sexual Discrimination Under the Federal Code §106.30

- ▶ Conduct on the basis of sex that satisfies one or more of the following: -
 - ▶ (i) An employee of the recipient [of federal funds] conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;
(*Quid pro quo*)
 - ▶ (ii) Unwelcome conduct that a reasonable person would determine is so severe, pervasive, **AND** objectively offensive that it effectively denies a person equal access to the school's education program or activity (hostile environment); or
(*Sexual Harassment*)
 - ▶ (iii) Sexual assault (as defined in the Clery Act), dating violence, domestic violence, or stalking as defined in the Violence Against Women Act.
(*Sexual Violence*)

Scope of Title IX - Who is subject?

- ▶ Schools, local and state educational agencies, and other institutions that receive federal financial assistance from the Department of Education
 - ▶ 17,600 local school districts, over 5,000 postsecondary institutions, and charter schools, for-profit schools, libraries, and museums.
 - ▶ Vocational rehabilitation agencies and education agencies of 50 states, the District of Columbia, and territories of the United States.

Scope of Title IX - What areas are regulated by Title IX?

Recruitment,
admissions, and
counseling

Financial
assistance

Athletics

Treatment of
pregnant and
parenting
students

Treatment of
LGBTQI+
students

Discipline

Single-sex
education

Employment

Title IX Jurisdiction

- ▶ Institution's program or activity in the United States
 - ▶ Institution property - Institution sponsored or affiliated events [substantial control is key]
 - ▶ Buildings owned or controlled by officially recognized student organizations
- ▶ Title IX does not apply to private conduct occurring in private location that is not part of education program/activity

Title VII of the Civil Rights Act

▶ “It shall be an unlawful employment practice for an employer -

(1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin; or

(2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, or national origin.

Hostile Environment Harassment

Title VII

- ▶ Harassment becomes unlawful where:
 1. enduring the offensive conduct becomes a condition of continued employment, or
 2. the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, *or* abusive.

Title IX

- ▶ Harassment is unlawful when the conduct is:
Severe *and* pervasive *and* objectively offensive conduct, effectively denying a person equal educational access

When does TTIC have to act on unlawful harassment?

Title VII

- ▶ Employers have a duty to protect employees from discrimination and harassment from each other and outside entities (customers, vendors, etc.)
 - ▶ Very broadly interpreted to mean if any manager or supervisor knows about it, the company has knowledge and must act.

Title IX

- ▶ Notice to a Title IX Coordinator, or to an official with authority to institute corrective measures on the recipient's behalf, charges a school with actual knowledge and triggers the school's response obligations.
 - ▶ Schools can designate other mandatory reporters if they wish.

TL;DR What's the Difference?

Title VII

- ▶ Sexual Harassment is
 - ▶ Quid pro quo
 - ▶ Hostile environment:
Sufficiently severe or pervasive
(Sexual assault, domestic & dating violence and stalking are included here)
- ▶ TTIC must act when a manager has knowledge

Title IX

- ▶ Sexual Harassment is
 - ▶ Quid pro quo
 - ▶ Hostile environment:
Unwelcome and sufficiently severe and pervasive and objectively offensive
 - ▶ Sexual assault, domestic & dating violence, stalking
- ▶ TTIC must act when a Person with Authority has knowledge

State and Local Laws

Illinois Human Rights Act

Prevents unlawful discrimination on the basis of:

- ▶ Age
- ▶ Citizenship status
- ▶ Marital status
- ▶ Race
- ▶ Sex
- ▶ Ancestry
- ▶ Color
- ▶ Gender/Gender Identity
- ▶ Physical and mental disability
- ▶ Religion
- ▶ Arrest record
- ▶ Familial status
- ▶ National origin
- ▶ Orders of Protection
- ▶ Pregnancy
- ▶ Military status
- ▶ Unfavorable military discharge

More State and Local Laws

- ▶ Illinois Preventing Sexual Violence in Higher Education Act (2015)
 - ▶ Sets out parameters for higher education institutions regarding prevention of sexual harassment and sexual violence, and responding to those incidents.
- ▶ Chicago Human Rights Ordinance (2012)
 - ▶ The Chicago Human Rights Ordinance prohibits workplace harassment based on race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity, marital status, parental status, age, disability, source of income, military discharge status or credit history. Employers have a duty to maintain a work environment free of harassment based on any of these protected classes.

Amendment to Chicago Human Rights Ordinance, effective July 1, 2022

- ▶ Update Policies to
 - ▶ State that sexual harassment & retaliation are illegal and provide definitions of sexual harassment, including expanded definition of sexual harassment.
 - ▶ “any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual’s employment position”
 - ▶ State that employees are required to be trained annually
 - ▶ Provide information on how employees can report allegations within the organization
 - ▶ Provide information on legal and government services available to employees who may be victims of sexual harassment
 - ▶ Be made available in the employee’s primary language (get ready to pay some translators)

Amendment to Chicago Human Rights Ordinance, continued

- ▶ **Training to be completed by June 30, 2023 and repeated annually**
 - ▶ One hour of sexual harassment prevention training for all employees that meets or exceeds the training requirements of the Illinois Human Rights Act
 - ▶ Two hours of training for supervisors and managers
 - ▶ One hour of “bystander” training.
- ▶ Retain proof of employee training as well as records of compliant policies for the longer of five years or the duration of any investigation or dispute. Failure to maintain records may result in a fine of up to \$1,000 per day
- ▶ Complainants now have up to 365 days from an alleged discriminatory act to file a complaint with the CCHR, which may delay notice of a complaint for up to 30 days.
- ▶ Fines for violations of sexual harassment provisions have increased to \$5,000-\$10,000 per violation.

- ▶ “Dear Colleague” Letter from Office of Civil Rights in 2011
 - ▶ Established in a clear way that sexual violence was seen as a violation of Title IX and schools had a duty to protect students from that violence.
 - ▶ Established that all schools had to have a Title IX Coordinators as well as a policy against sex discrimination and accessible complaint procedure.
 - ▶ Defined sexual harassment as any “unwelcome conduct of a sexual nature,” including “verbal conduct” such as “making sexual comments, jokes, or gestures,” “spreading sexual rumors,” and “creating e-mails or Web sites of a sexual nature.”
 - ▶ Established that if a school will be held as liable if they “should have known” about sexual harassment/discrimination
 - ▶ Mandated Reporter - Almost everyone on campus must report suspected sexual discrimination
 - ▶ Informal resolutions allowed but not in the case of sexual assault

How We Got Here - A Brief History of Title IX in recent years

Preventing Sexual Violence in Higher Education -- 2015

- ▶ Many similar provisions to Title IX but went further:
 - ▶ Comprehensive policy to be published on website
 - ▶ Reporting options to include third party and anonymous reports
 - ▶ Training requirement for students taking 1+ course
 - ▶ Sets standard of proof as “preponderance of the evidence” (>50%)
 - ▶ Amnesty provisions for students on other conduct violations (drinking, etc.)
 - ▶ Training for grievance process adjudicators/panel members
 - ▶ Confidential Advisor for victims
 - ▶ Annual reporting

TTIC Policies - 2016 through July 2020

Sexual Misconduct Policy

- Title IX and PSVIHE-compliant
- Only dealt with discrimination based on sex and gender
- Single investigator model
 - Investigator investigates, gives report to supervisor who verifies validity of investigation and sanctions if necessary

Discrimination, Harassment and Abusive Behavior

- Title VII-compliant
- Dealt with other forms of discrimination (race, color, gender, etc.)
- Also addressed abusive behavior/bullying - not illegal, but not permissible at TTIC.

- ▶ Major provisions:
 - ▶ Rescind Dear Colleague Letter
 - ▶ Redefined sexual harassment: “severe, pervasive and objectively offensive”
 - ▶ Complaints *must* be dismissed if they do not meet this definition
 - ▶ Title IX applies to everyone on a campus: staff, faculty and students.
 - ▶ Conduct must occur within an “education program or activity” on U.S. soil
 - ▶ Investigator cannot be part of the hearing panel - No “single investigator” model
 - ▶ Public posting of all materials used to train anyone involved in the Title IX resolution process
 - ▶ Mandatory live hearing for formal resolution of complaints
 - ▶ Advisors allowed (if one party has one, the school must supply the other party with one)
 - ▶ Title IX complaint not considered “received” unless it is relayed to an official with authority to enact supportive measures - no mandated reporters required
 - ▶ No “gag orders” - either party may discuss the report in order to gather evidence
 - ▶ Notice Requirements

Title IX regulations from August 2020

Live Hearing

- ▶ New due process considerations
 - ▶ Allows for cross-examination conducted by advisor
 - ▶ Determination of relevancy of evidence
- ▶ Final determinations of responsibility and sanctions are made by decision-makers
 - ▶ Cannot be the Title IX Coordinator or assigned investigator
- ▶ Process considerations
 - ▶ Must be recorded or transcribed and available to all parties to review
 - ▶ May be held virtually
 - ▶ Time requirements for review of evidence (10 days)
- ▶ All participants must be trained on their role in the process
- ▶ Institutions can establish rules of decorum



Notice Requirements

Prior to initial meeting with investigator, notice is sent to both parties:

Report has been made that may violate Title IX

Who are the parties involved

Date of alleged incident

Respondent is presumed not responsible

Respondent may have an advisor (who could be an attorney)

Respondent may inspect and review evidence

Retaliation

- ▶ Who is protected: Reporters, Complainants, Witnesses, Respondents, even those who choose to not participate
- ▶ What is protected: Intimidation, threats, coercion, discrimination
 - ▶ Ex. Charging individuals for code of conduct violations that arise out of the same facts or circumstances
 - ▶ Ex. Not keeping the identity of the Complainant, Respondent, or any witnesses confidential

Records retention

- ▶ 7-year records retention mandate:
 - ▶ Reports [supportive measures, why not deliberately indifferent and what measures taken to restore or preserve equal access]
 - ▶ Investigations [determinations, recording of hearing, sanctions and remedies implemented]
 - ▶ Appeals
 - ▶ Informal resolutions [results]
 - ▶ Training materials

TTIC Policies - August 2020 to present

- ▶ Two policies
 - ▶ Sexual Harassment Policy - strictly Title IX
 - ▶ Discrimination, Harassment and Abusive Behavior Policy revisions
 - ▶ Covers what Title IX doesn't - smaller incidents, behavior outside the U.S. behavior that may be legal under Title IX, but is unacceptable at TTIC.
 - ▶ Helps comply with PSVHE - allows for third party and anonymous reporting
 - ▶ Also covers other illegal harassment and discrimination, as well as abusive behavior (not illegal but against policy)
- ▶ All supervisors/instructors as Reporting Officials
 - ▶ Satisfies Title VII - "should have known"
 - ▶ Possibility of minor students (however small)
 - ▶ Allows person to disclose to someone they know
 - ▶ The power always remains with the student complainant - they can choose to pursue a Title IX/DHAB complaint or not

How does TTIC define Sexual Harassment?

Title IX - Sexual Harassment Policy

- ▶ Sexual violence, domestic violence, dating violence, stalking
- ▶ Quid Pro Quo
- ▶ Unwelcome verbal, nonverbal, or physical conduct based on sex (including gender stereotypes), determined by a Reasonable Person to be so severe, pervasive, **and** objectively offensive that it effectively denies a person equal access to participate in or to benefit from an institutional education program or activity.

Title VII - DHAB Policy

- ▶ Unwelcome verbal, nonverbal, or physical conduct, or conduct using technology based on sex (including gender stereotypes) that
 - ▶ Is severe or pervasive and has the purpose or effect of persistent interference with an individual's work performance or educational program participation; OR
 - ▶ That creates an intimidating, hostile, or offensive work or educational environment.

TTIC Policies - Part II

- ▶ Outsourced formal Title IX investigation process
 - ▶ Reduce Conflict of Interest
 - ▶ Training on procedures for live hearings including evidentiary suitability (rape shield laws, etc.)
 - ▶ Possibility of lawyer as Advisor

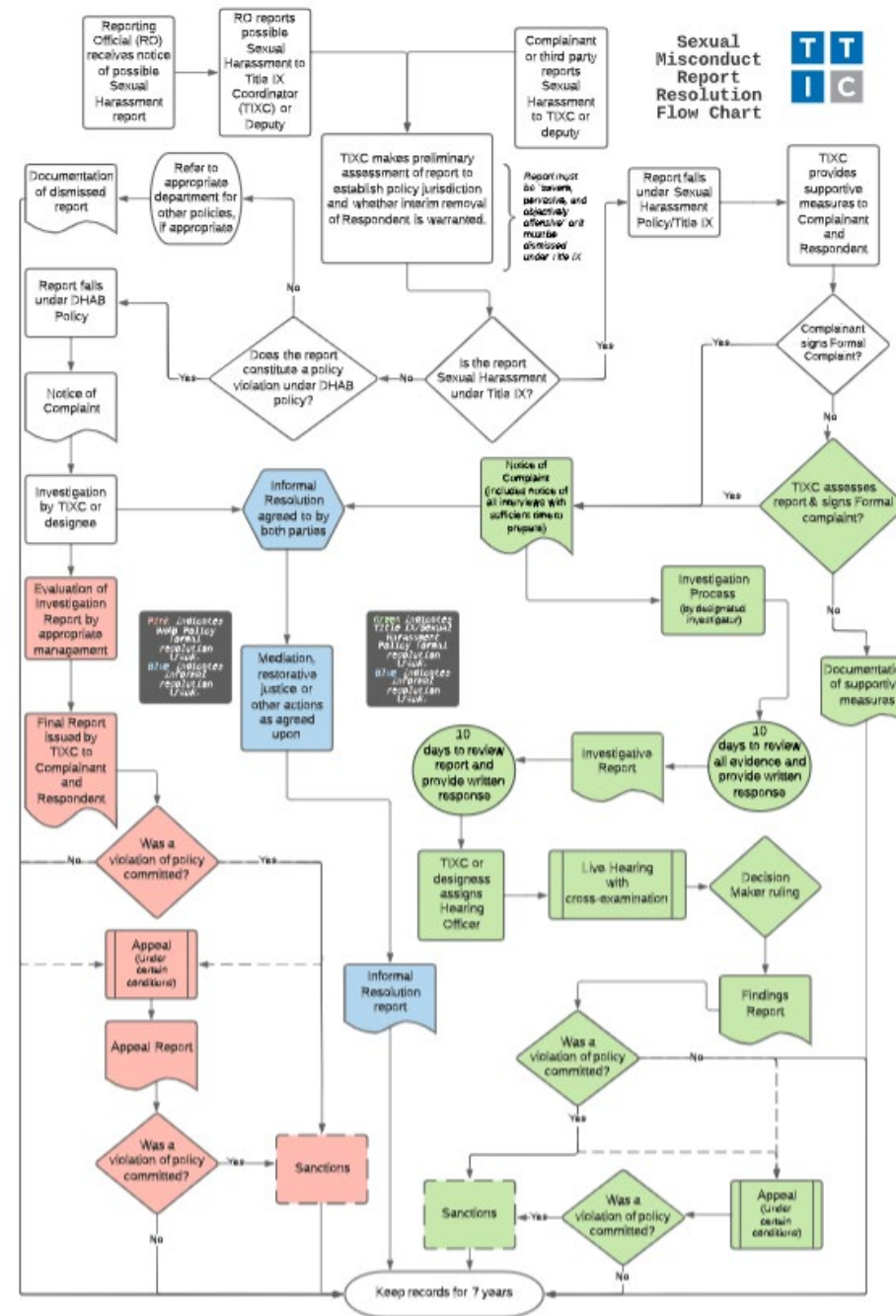
- ▶ New Title IX regulations would:
 - ▶ Widen the scope of what is considered sexual harassment under Title IX
 - ▶ “all forms of sex-based harassment, including unwelcome sex-based conduct that creates a hostile environment by denying or limiting a person’s ability to participate in or benefit from a school’s education program or activity.”
 - ▶ Formalize protections for sexual orientation and gender identity under Title IX
 - ▶ Make live hearings with cross-examination an option, but not mandatory
 - ▶ Require certain campus employees (including most faculty) to be mandatory reporters of student complaints.
 - ▶ Require all faculty and staff to provide Title IX Coordinator’s information unless they are confidential resources
 - ▶ Require colleges to confront off-campus conduct that “creates or contributes to a hostile environment.”

New Title IX Rules Proposed June 23, 2022

Updates to Title IX rules - Proposed June 23, 2022

- ▶ Prohibits discrimination based on sexual orientation and gender identity for the first time in history
- ▶ Expands coverage to behavior that occurs in education programs off campus, including out of country.
- ▶ Expands mandatory reporting requirements to all employees at colleges that operate an educational program who have knowledge of an instance of sex discrimination.
- ▶ Requires “prompt time frames” for investigating cases of discrimination.
- ▶ Elimination of cross-examination and live hearing requirement from the rules for campus hearings.
- ▶ Requires colleges to allow students who participate in a live hearing to do so remotely if they choose.
- ▶ Created new eligibility for retroactive complaints after a student leaves an educational program due to an instance of discrimination.
- ▶ Allows informal resolution of an incident without the submission of a formal complaint.
- ▶ Requires protections for pregnant students and employees.

TTIC's Sexual Misconduct Resolution Processes



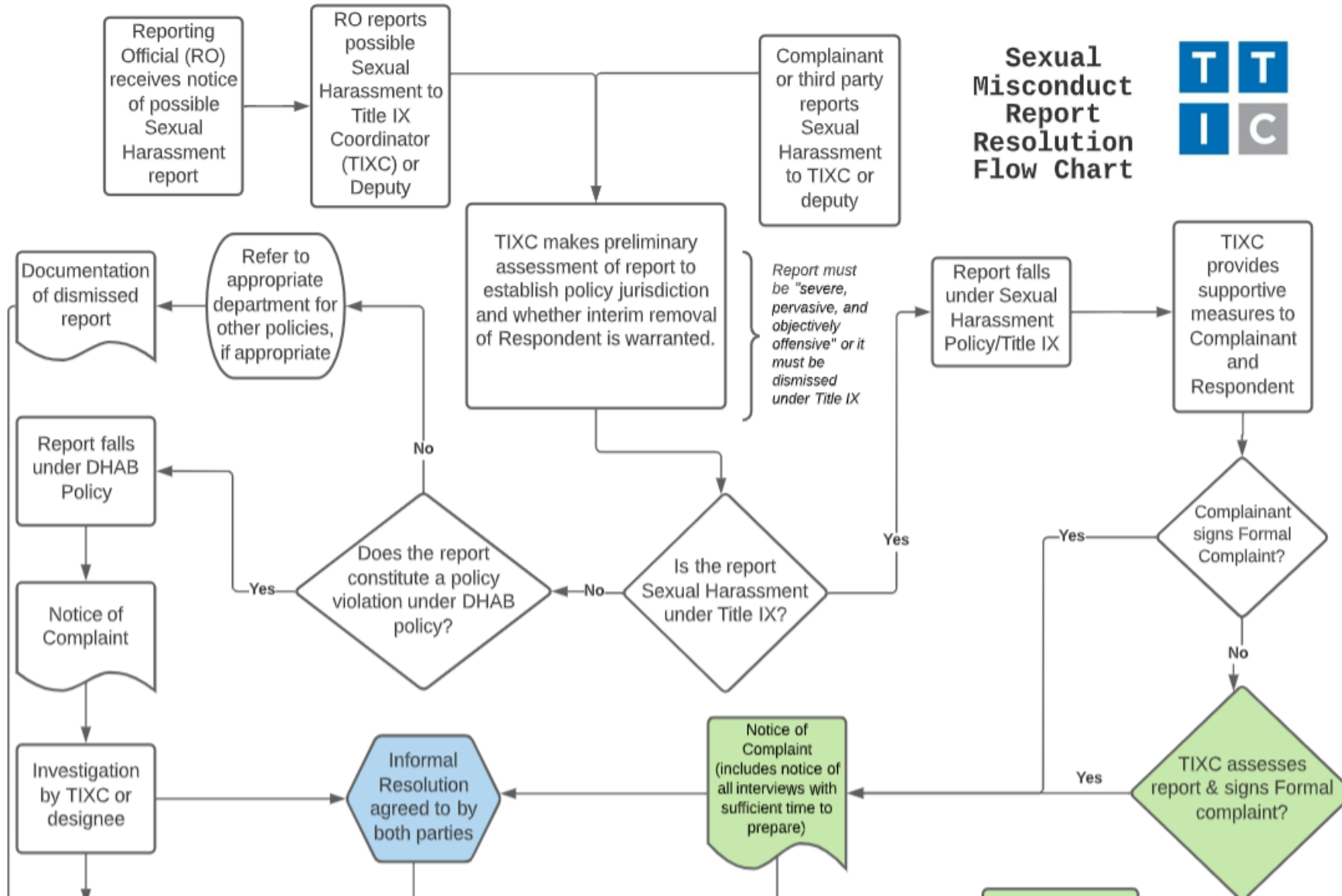
TTIC Adjudication Processes: What's the difference?

Sexual Misconduct Process - for sexual misconduct complaints from employees and students not covered under Title IX, not informally resolved

- Investigated by the Title IX Coordinator or designee (under DHAB policy)
- Investigator performs all questioning
- Relevancy determinations are made during the investigation
- Investigators and decision-makers are permitted to rely on statements provided in the investigation report.

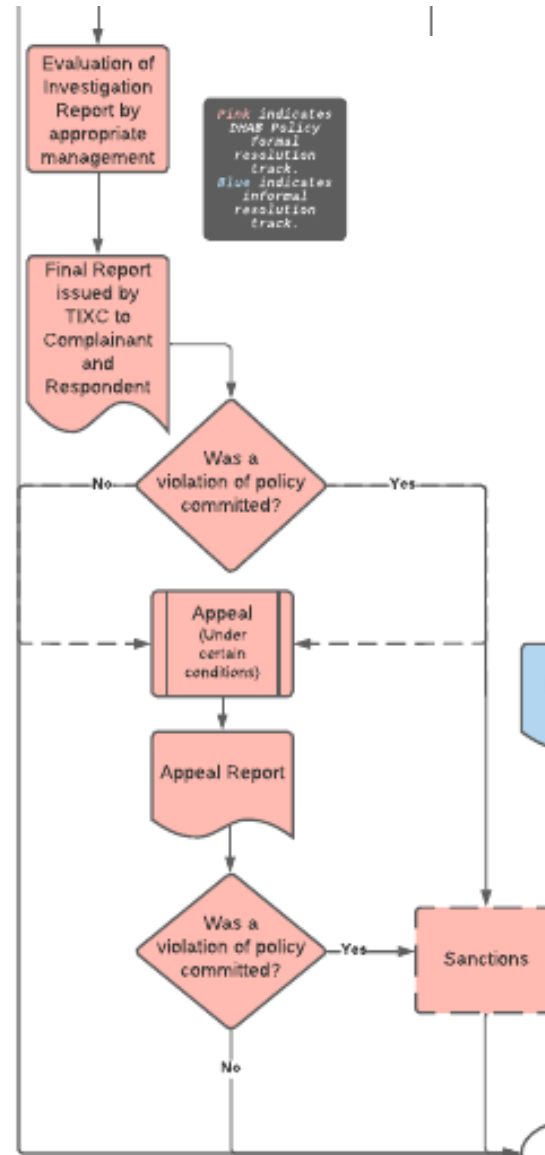
Title IX - For complaints from employees and students that are not informally resolved

- Heard by a designated outside decision maker in a hearing
- Advisors can conduct cross-examination
- Relevancy determinations must be made by the hearing officer before a question may be answered
- If an individual does not testify or submit to cross examination, the decision maker cannot rely on their statements.



Pre-Hearing Complaint Process

The DHAB Process



Role of the Supervisory Decision Maker - DHAB Policy

- ▶ Receive investigation report from Title IX Coordinator
 - ▶ Summary of facts
 - ▶ Determination of policy violation using a preponderance of evidence standard (i.e. more likely than not)
 - ▶ Recommendations on actions, including possible disciplinary action
- ▶ Confer with other supervisory decision maker to verify a violation of policy occurred or not and notify Complainant and Respondent final resolution.

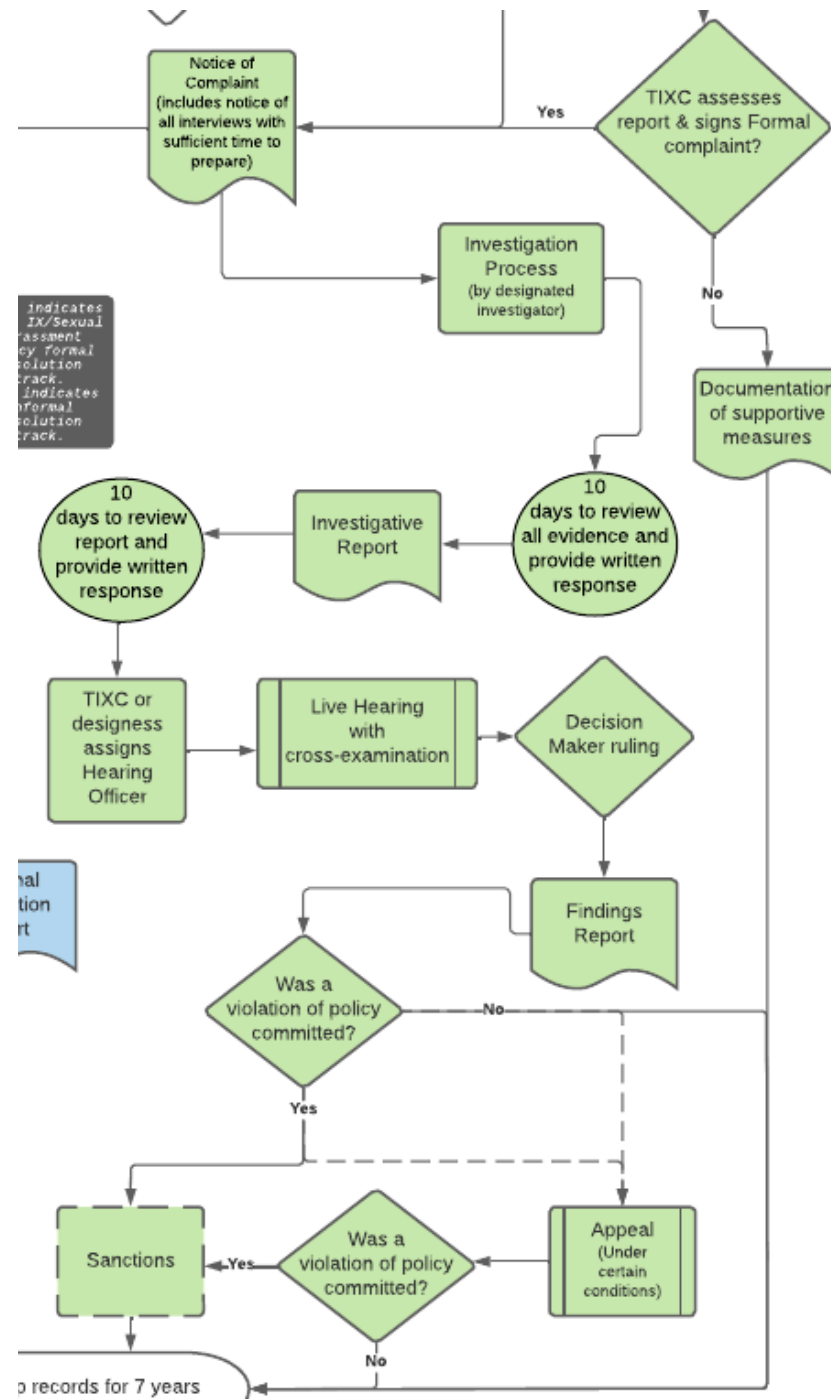


Role of the Appeals Officer - DHAB Policy

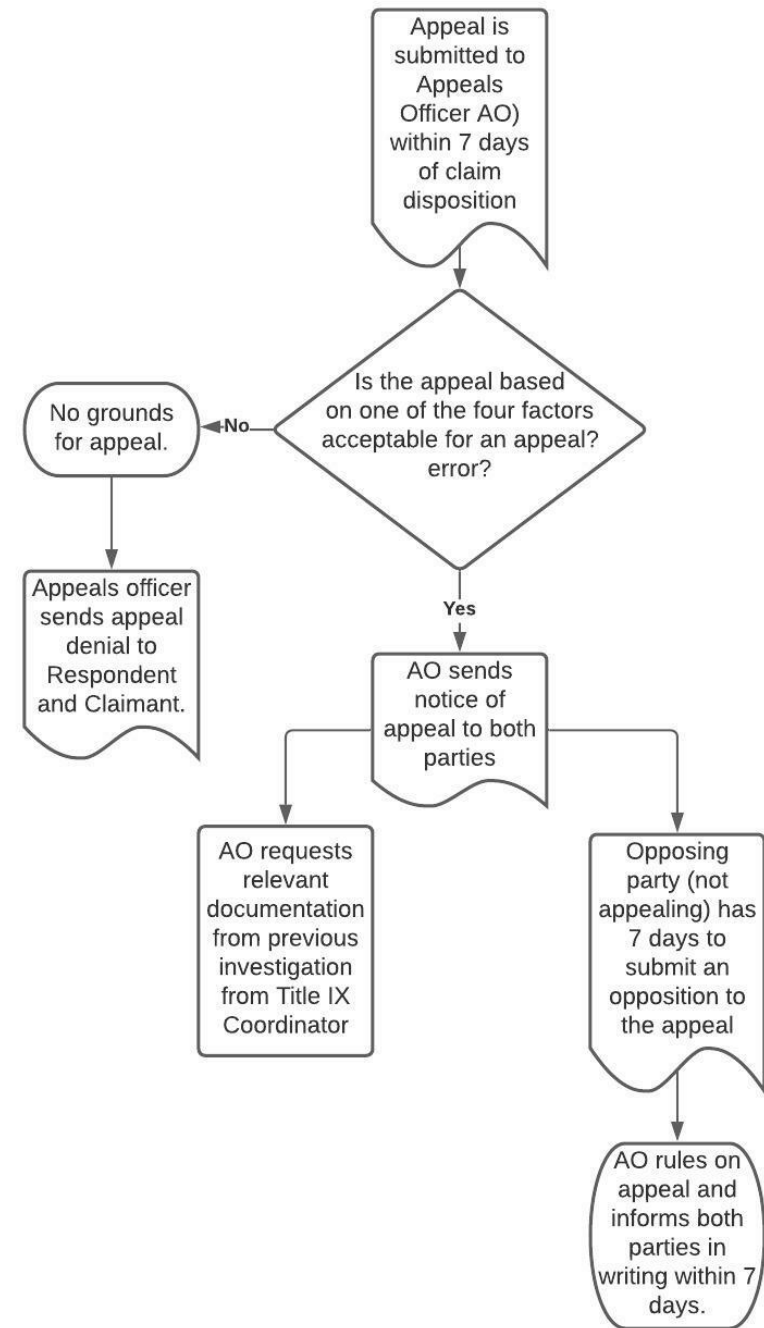
Review	Provide Notice	Arrange
Fair and unbiased review of the eligibility for appeal (must be filed within 30 days of determination on complaint)	If appeal is valid, provide notice to other party about filing opposition and request records from Title IX Coordinator/investigator.	Arrange for second investigation by different investigator (w/in 45 days of receipt of appeal)

- **Criteria for appeal**
 - No grounds specified - “A party who is not satisfied with the outcome of the initial investigation by the TTIC Discrimination, Harassment and Abusive Behavior Policy Investigator”
 - Decide to start a second investigation with new investigator

The Title IX Process



Appeals Flow Under SH Policy



Role of the Appeals Officer - Sexual Harassment Policy

Review

Fair and unbiased review of the eligibility for appeal (must be filed within 7 days of determination on complaint)

Provide Notice

If appeal is valid, provide notice to other party about filing opposition and request records from Title IX Coordinator.

Determine

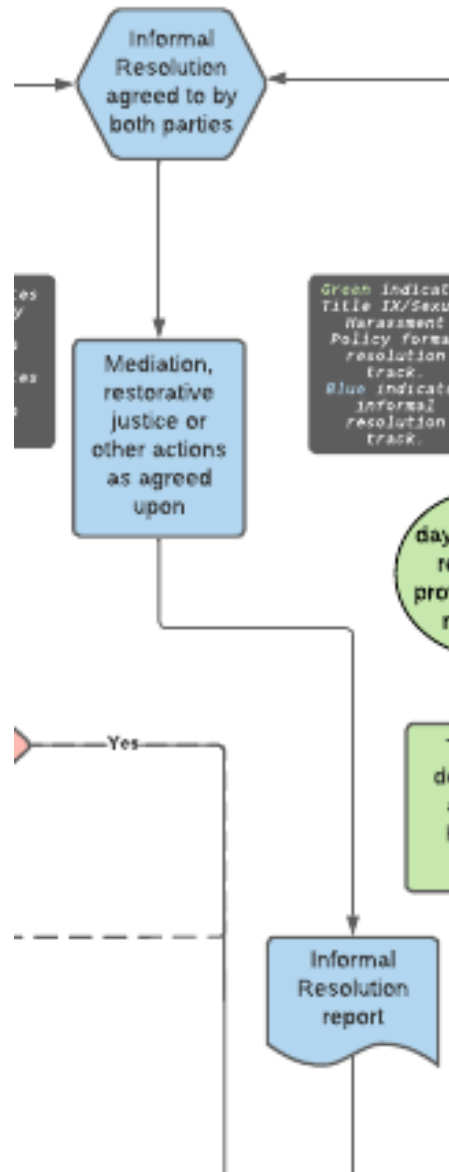
Make a determination regarding the validity of the appeal, based on the eligibility factors described on the next slide.

Grounds for Appeals under SH Policy

Chief Academic Officer (students & faculty) or Chief Administrative Officer (staff and visitors)

- A procedural irregularity affected the outcome;
- New evidence that was not reasonably available at the time the determination or dismissal was made that could have affected the outcome;
- Conflict of Interest by the Title IX Coordinator, investigator, hearing officer, or administrative officer
- The sanction is disproportionate with the violation.

What About Informal Resolution?



What is “severe, pervasive
and objectively
offensive”?

- ▶ Factors to consider (from the perspective of the Complainant as a “reasonable person”)
 - ▶ Frequency
 - ▶ Nature of the unwelcome acts
 - ▶ Physical? Verbal? Both?
 - ▶ Were threats, humiliation or intimidation involved?
 - ▶ Severity
 - ▶ Relationship between the parties (ages, hierarchies)
 - ▶ Was there a demonstrable interference with educational or employment opportunities? - drop in grades, decreased attendance
 - ▶ ***Intent is not a factor.***

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Reasonable Person

- ▶ A hypothetical individual who approaches any situation with the appropriate amount of caution and then sensibly takes action.
 - ▶ This hypothetical person is not identified as a specific sex, gender, age, race, ethnicity, or color; does not ascribe to any particular religion; is not from any specific country; and does not identify as any particular sexual orientation.
- ▶ Would a reasonable person in the Complainant's shoes consider the Respondent's actions severe, pervasive and objectively offensive enough to be considered sexual harassment under Title IX?

Severe

- The severity of an incident depends largely on the nature and scope of the conduct as alleged, although you can also look at its impact.
 - Physical conduct of a sexual nature often qualifies as severe
 - Treatment that is humiliating, threatening, or violent heightens the severity of the incident.
 - Comments, jokes, online postings, photographs, etc. are usually not sufficiently severe to create a hostile environment.

Pervasive

- ▶ Pervasiveness hinges on how widespread, openly-practiced, prevalent, and/or distributed the conduct is.
 - ▶ Unwelcome sex- or gender-based conduct that is well-known among students or employees can qualify as pervasive.
 - ▶ Conduct that occurs in public spaces is more pervasive than conduct in private.
 - ▶ Online, electronic, or social media postings and conduct, which often spread rapidly and widely, heighten the pervasiveness by which offensive and unwelcome content can be disseminated.
 - ▶ The frequency of the conduct, or its persistence, is also considered, as are the relative intensity and duration of the conduct.
 - ▶ The more severe the conduct, the less pervasive it must be to create a hostile environment.
 - ▶ The longer an action or incident lasts, or the more often conduct is repeated, the more likely it will be deemed persistent.

Objectively Offensive

- ▶ Elements to examine include, but are not limited to:
 - ▶ The age and relationships of those involved;
 - ▶ The frequency of the conduct; the severity of the conduct;
 - ▶ Whether the conduct is physically threatening, humiliating, ridiculing, intimidating, or abusive;
 - ▶ The number of persons involved

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Understanding Force and Incapacitation's Effect on Consent

What is Consent?

- ▶ **Consent is clear, coherent, willing and ongoing**
 - ▶ Words or actions that show a knowing and voluntary willingness to engage in a mutually agreed upon sexual activity
 - ▶ Past consent ≠ Present consent
 - ▶ Scope of consent: Consent to some acts does not confer consent to all acts
 - ▶ Must be freely given, informed and active: Not “not a no” but instead is an “enthusiastic, repeated yes”.
 - ▶ Can be invalidated by: force, intimidation, incapacitation, or withdrawal
 - ▶ Force can be in the form of physical violence, threats or coercion.

How do force and/or incapacitation affect consent?

1. Was **force** used by the Respondent to engage in sexual activity?
2. Was the Complainant **incapacitated**?
 1. a) Did the Respondent know OR
 2. b) Should the Respondent have known that the Complainant was incapacitated?
3. What clear words or actions by the Complainant gave the Respondent indication that the sexual activity was mutually agreed upon?
4. Was the Complainant's **consent** withdrawn during the sexual activity?

Rules to Remember about Consent

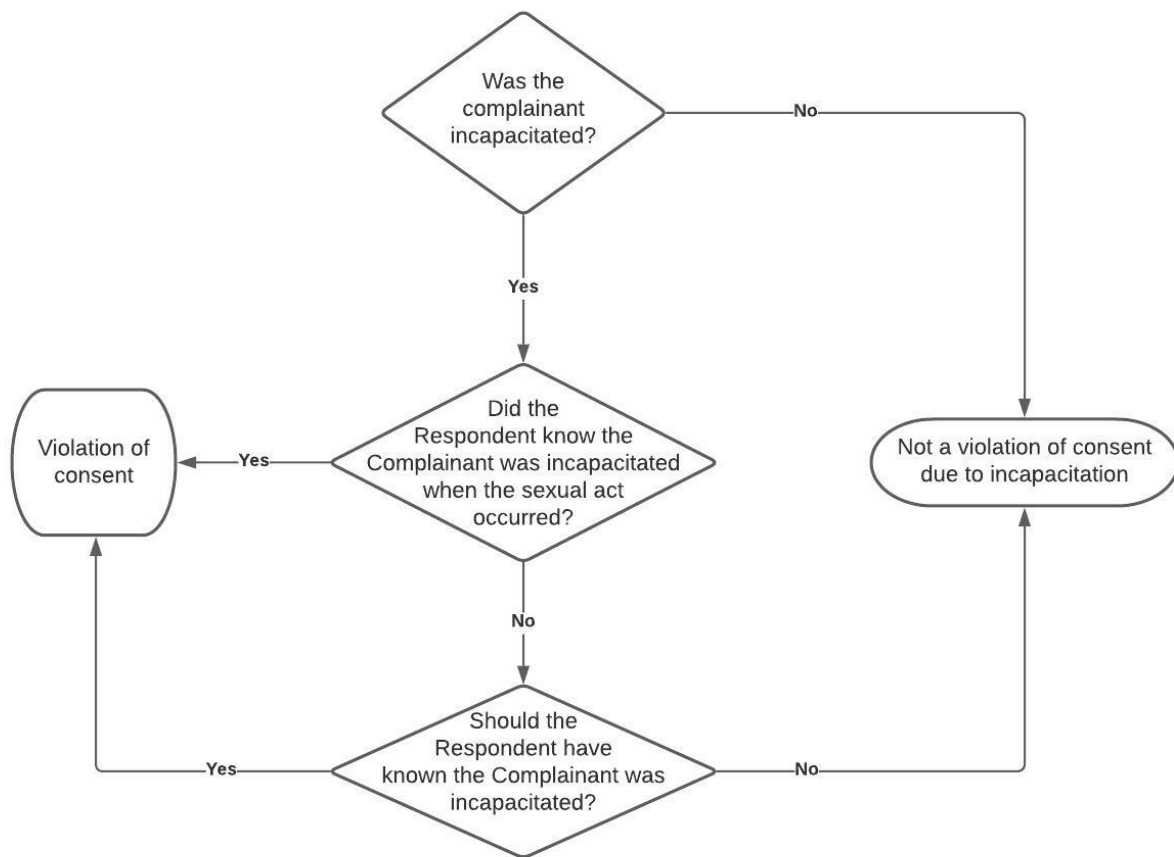
- ▶ No means no, but nothing also means no
 - ▶ Silence and passivity do not equal permission
- ▶ To be valid, consent must be given prior to or contemporaneously with the sexual activity
- ▶ Consent can be withdrawn at any time
 - ▶ The person withdrawing consent is expected to clearly communicate with words or actions that they are withdrawing consent.
 - ▶ Other person is required to cease sexual activity until/unless consent is regained.

Force Factors that Affect Consent

- ▶ Intimidation - an implied threat that menaces and/or causes reasonable fear
- ▶ Coercion - the application of an unreasonable amount of pressure for sexual access
 - ▶ Consider:
 - ▶ Frequency
 - ▶ Intensity
 - ▶ Duration
 - ▶ Isolation

Impact of Incapacitation on Consent

- ▶ Physical and/or mental inability to make informed, rational judgments
 - ▶ Could the Complainant make rational, reasonable decisions ?
 - ▶ Could the Complainant appreciate the situation and address it consciously?
- ▶ Incapacitation is a determination that will be made after the incident in light of all the facts available
- ▶ Assessing incapacitation is very fact dependent analysis of the incident in question
- ▶ Various forms of incapacity
 - ▶ Alcohol or other drugs (More than mere intoxication or drunkenness)
 - ▶ Mental/cognitive impairment
 - ▶ Injury
 - ▶ Sleep/consciousness

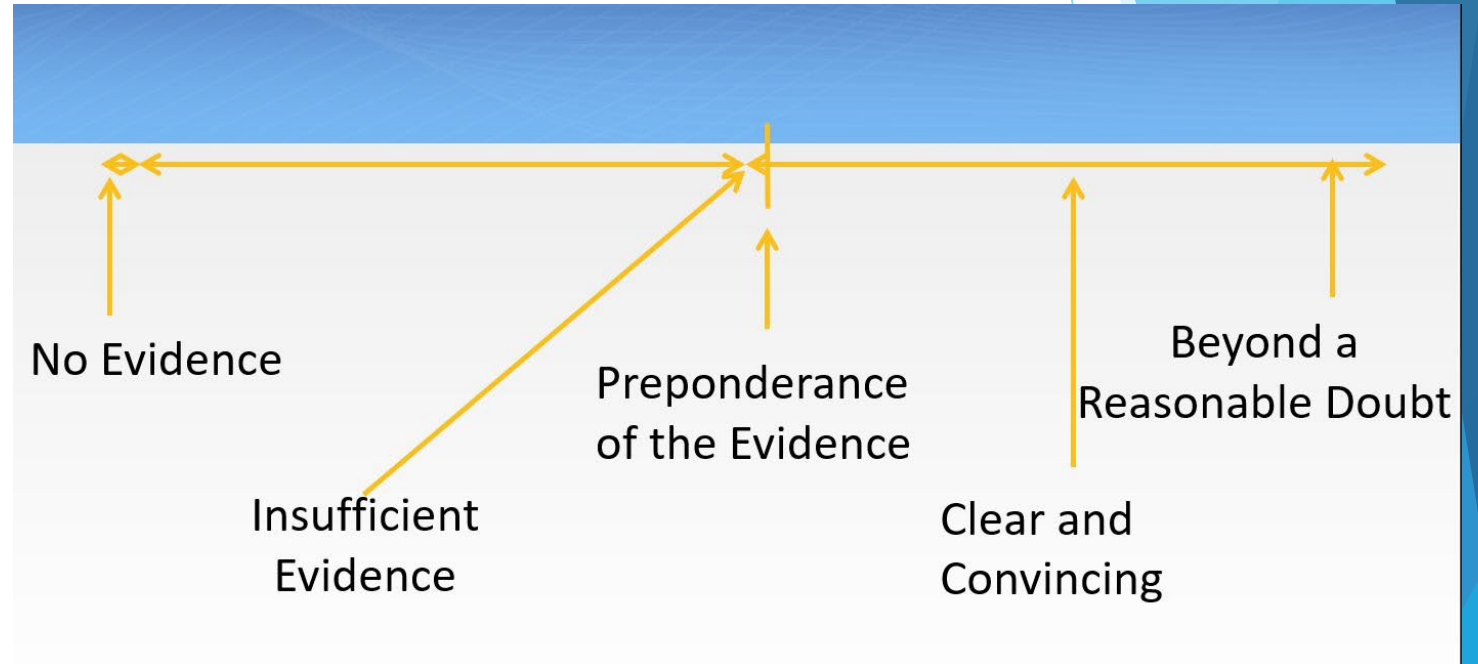


Incapacitation -Consent Flow Chart

Assessing Evidence

Evidentiary Standard

- ▶ Preponderance of the Evidence
 - ▶ It's "more likely than not" that this occurred
 - ▶ 51% certainty



Weighing Evidence -- Relevance

Relevant

- ▶ Must relate to the incident at issue and be of sufficient value in the overall determination
- ▶ Must be offered by an individual with actual knowledge of the event

Irrelevant

- ▶ Questions and information regarding the Complainant's sexual history or sexual predisposition unless to prove:
 1. Someone else other than the Respondent committed the alleged misconduct
 2. Consent between the parties

Weighing Evidence

▶ Reliability

- ▶ Information that can be trusted
- ▶ Comes from individuals who are able to have assumed the role they claimed to have or those with actual training or experience to support their claim of expertise

▶ Persuasiveness

- ▶ Induces others to believe through understanding; tries to convince
- ▶ Must be believable, consistent, and establishes a dependable narrative
 - ▶ *Note: be mindful of the rehearsed narrative*

Weighing Evidence -- Bias

- ▶ Bias
- ▶ Understand who the person is and their relationship to the parties and incident at issue
- ▶ Bias can manifest in multiple ways:
 - ▶ Towards the parties
 - ▶ Towards the incident
 - ▶ Towards the process

Weighing Evidence -- Credibility

- ▶ “To assess credibility is to assess the extent to which you can rely on a witnesses’ testimony to be accurate and helpful in your understanding of the case” - AtIXa
- ▶ Credible is not synonymous with truthful - but may involve lack of truthfulness. Also not synonymous with absolute truth
- ▶ Memory errors do not necessarily destroy a witness’ credibility
- ▶ Refrain from focusing on irrelevant inaccuracies and inconsistencies

Factors to Consider When Assessing Credibility

- ▶ Is the description of the incident plausible?
 - ▶ Logic/Consistency/Reasons to Avoid Specific Response
 - ▶ Ask “Does this make sense?”
- ▶ Is the description corroborated? Corroborating evidence is important
- ▶ Did the witness report their account to anyone close to the time of the events?
- ▶ Does the witness have a reason or motive to lie or falsify information about the account?
- ▶ Does the witness have a past record of behavior that would either substantiate or refute their account?

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Questions?