

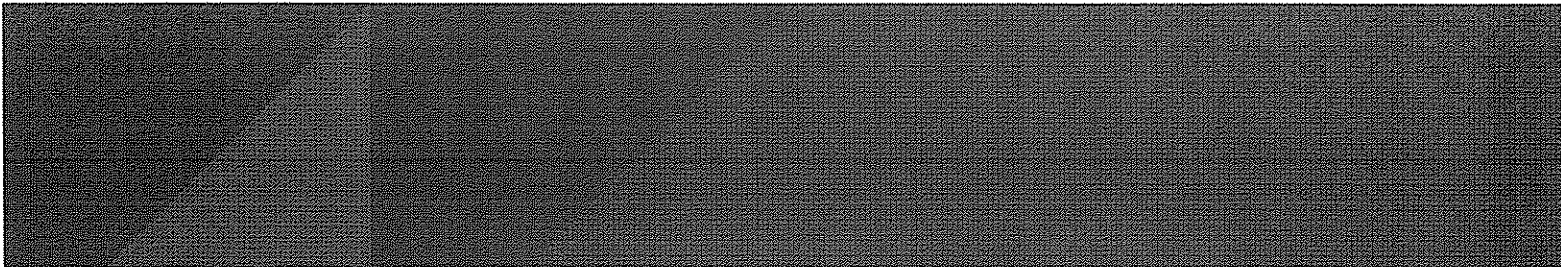


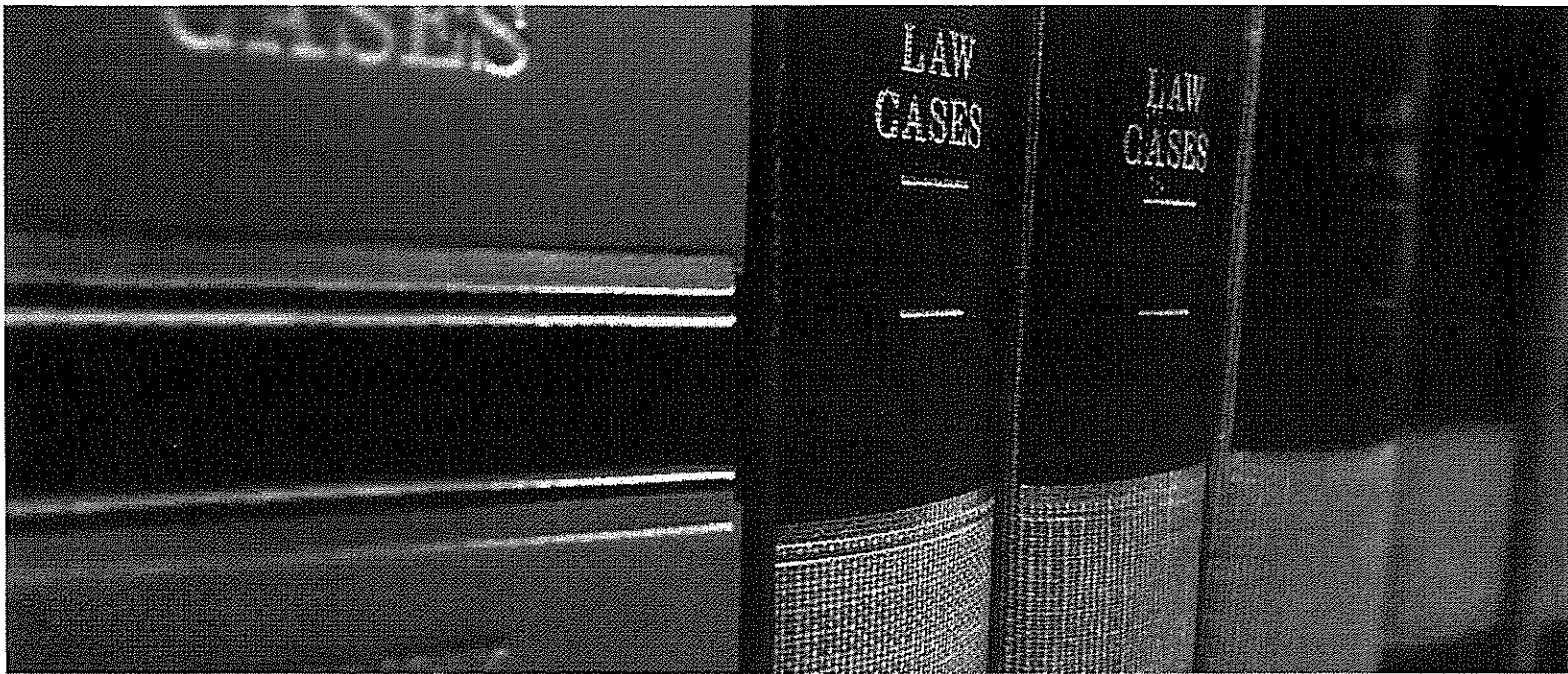
TIX Education Specialists

"Bridging compliance and best practice."

Title IX Hearing Officer Training Online

Overview of Title IX & the Law





STATUTORY REQUIREMENTS

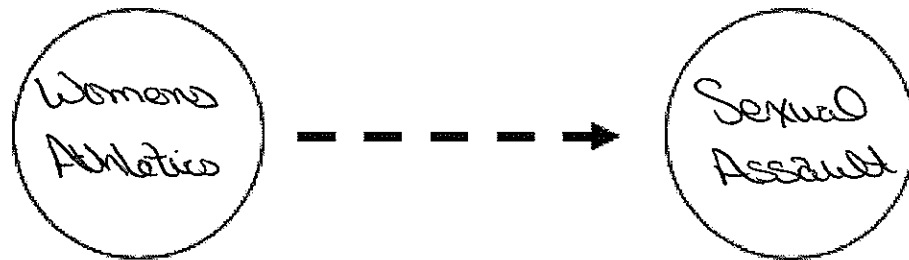
A review of basic federal requirements including notice of non-discrimination, grievance procedure and scope of Title IX Coordinator's role. Integration of relevant state law.

Learning Objectives:

- clear understanding of requirements of Title IX
- identifying roles of Title IX coordinator in relation to written procedure

INTRO TO TITLE IX

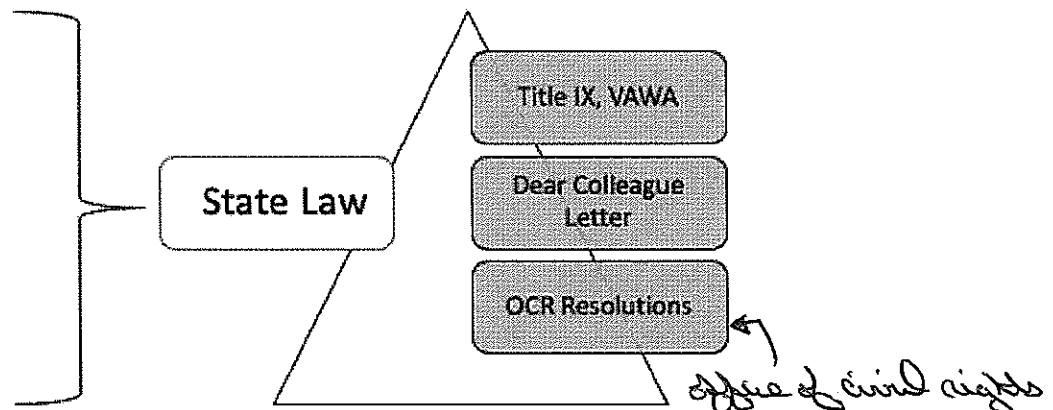
WHAT COMES TO MIND WHEN PEOPLE HEAR "TITLE IX"?



MAIN AREAS OF TITLE IX:

1. Sexual Harassment
2. Retaliation
3. Athletics
4. Single-sex classrooms
5. Gender identity and gender expression
6. Pregnant and parenting students

GUIDANCE THAT GOVERN RESPONSE PROCESSES:



LANGUAGE OF TITLE IX:

reporting party/complainant

adjudicatory process

investigation

finding

victim

investigation

COMPLAINANT:

"[I]ndividual who is alleged to be the victim of conduct that could constitute sexual harassment."

Title IX:

"A recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States to respond promptly in a manner that is not deliberately indifferent, meaning not clearly unreasonable in light of the known circumstances."

Students/staff have a right to: *Access an education free of violence and discrimination.*

TITLE IX IN THE COURTS:

MAIN RESPONSIBILITIES UNDER TITLE IX:

Sex based
discrimination



Sexual
Harassment

- 1. Sexual Harassment
- 2. Sexual Assault
- 3. Domestic Violence
- 4. Dating Violence
- 5. Stalking

EXEMPTIONS TO TITLE IX:

Religious exemptions
Private undergraduate admissions
Single-Sex Public School
Voluntary organization

ENFORCEMENT OF TITLE IX:

Office for Civil Rights (OCR)

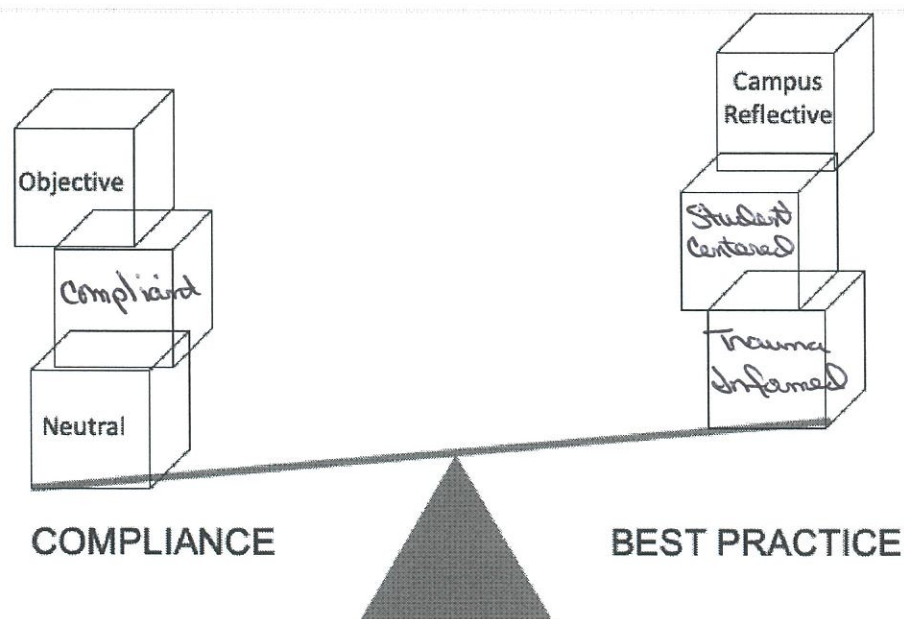
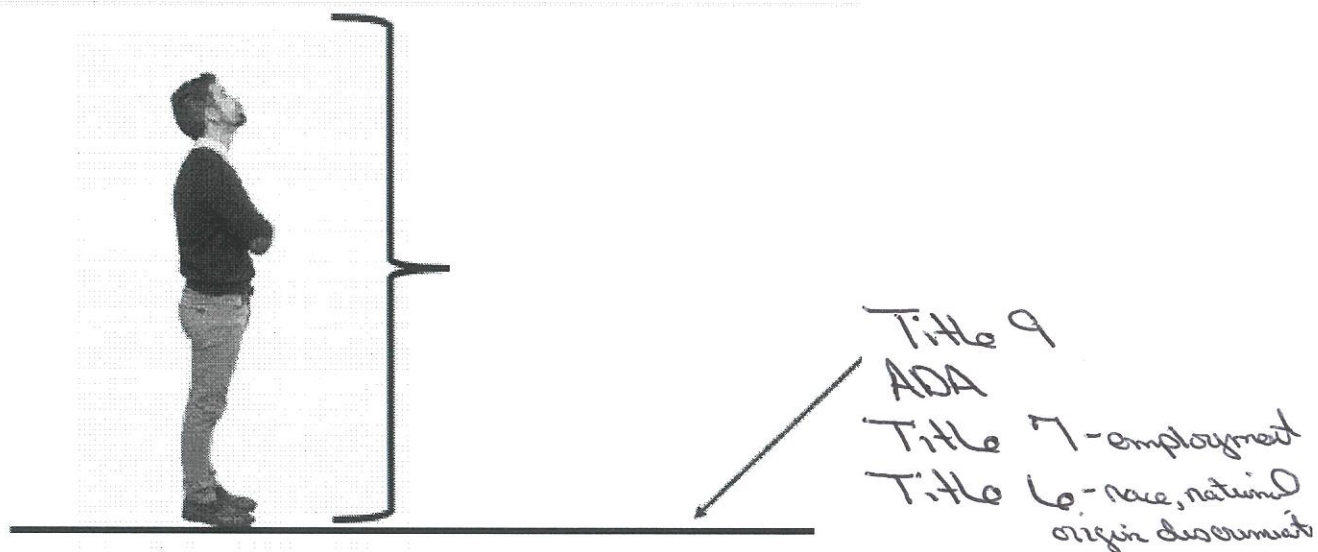
OCR COMPLAINTS:

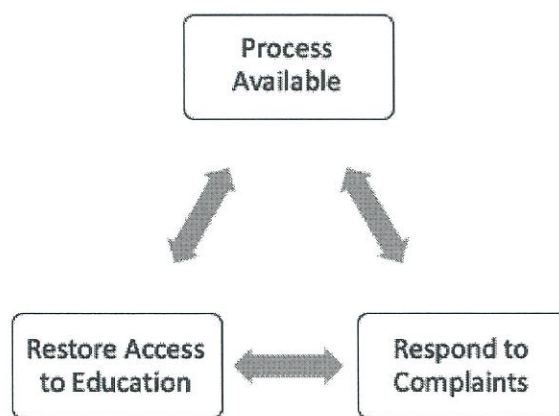
Disability discrimination
Sex discrimination
Race/ethnic/national origin discrimination
Age discrimination
Boy Scouts of America Equal Access Act of 2001

What should you read (cheat sheet)

New Regs:

- p.1-104 – The Department's interpretation of Due Process, institutional liability and defining sexual harassment.
- p. 96-99 – Institutional response — *should read*
- 2008-2033 – Regulatory language

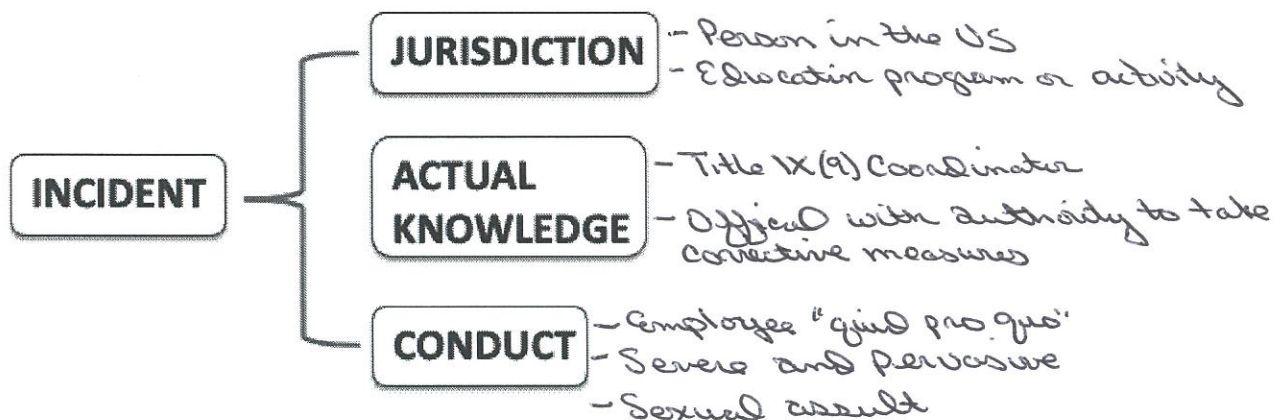




SEXUAL HARASSMENT:

"Unwelcome conduct that a reasonable person would determine is so severe, pervasive and objectively offensive that if effectively denies person's equal access to education.

And means: all or nothing

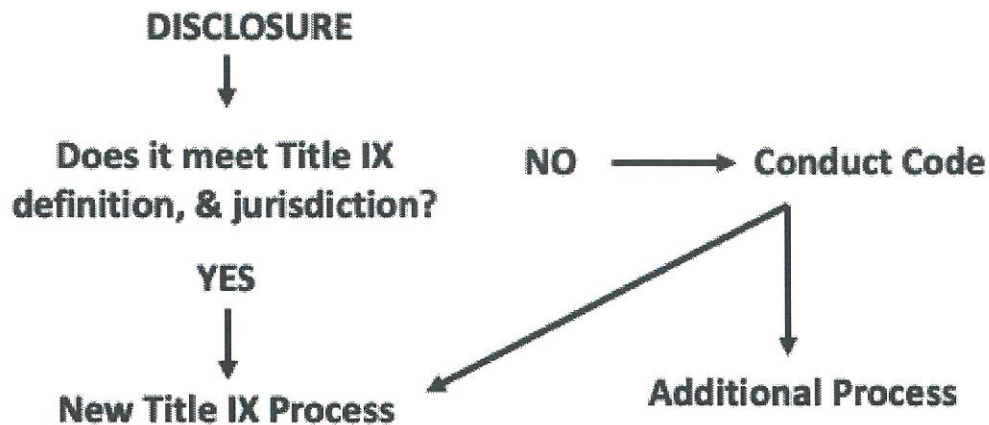


QUESTION 1:

Does your institution want to create a policy to respond to the "other" types of sexual harassment and sex discrimination?

QUESTION 2:

If you capture "other" types of conduct, do you use one process provided by the federal regulations or do you use two?



SCOTUS FRAMEWORK:

1. actionable definition of sexual harassment
2. actual knowledge
3. deliberate indifference -

DELIBERATE INDIFFERENCE + RESPONSE:

- support measures offered
- contact complainant and process counsel
- follow grievance procedures
- investigate formal complaints
- respect complainant wishes (with exception)
- dismiss complaints that don't fall under Title IX

Note: Title 9 coordinator?

TITLE IX COORDINATOR:

What needs to be shared

Name/Title

Office Address

Email Address

Telephone Number

must allow for varied ways to make a report including after "business hours."

TRAINING: Must include:

Definition of Sexual Harassment

Scope and Jurisdiction - education program or activity

How to conduct an investigation

Adjudication process - hearing, appeals

Informal resolution process

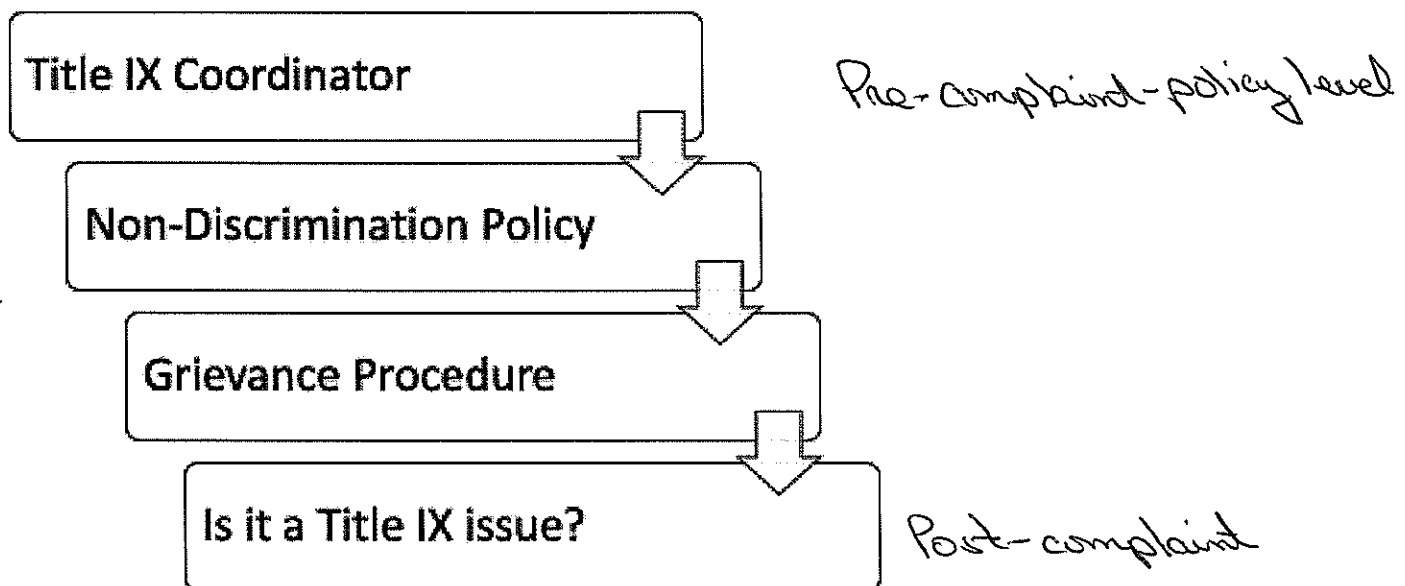
How to serve impartially

NOTICE OF NON-DISCRIMINATION:

"[Institution] does not discriminate on the basis of sex in education programs or activities it operates including admissions and employment. Inquiries about the application of title IX and this part to such recipient may be referred to the recipient's Title IX Coordinator, to the Assistant Secretary, or both."

DISSEMINATION:

GRIEVANCE PROCEDURE:



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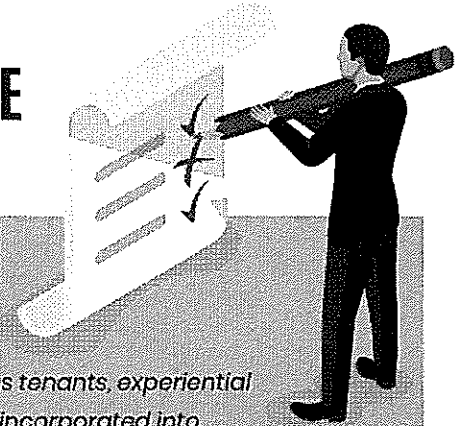
INSTITUTIONAL ASSESSMENT: BRIDGING COMPLIANCE AND BEST PRACTICE

WHAT IS YOUR INSTITUTION'S MISSION WHEN IT COMES TO TITLE IX?

Students and staff often assume the purpose admission of Title IX on campus based on how the news frames Title IX, what friends and colleagues have said, as well as past experiences with institutional systems. Below write down what your institution's goal is for Title IX response and programs on campus. For example, is prevention an element of your mission? Creating better campus culture? Responding to incidences on campus? Intervening in behavior before it escalates or perpetuates into a pattern of behavior? Creating safe space for students to earn degrees?

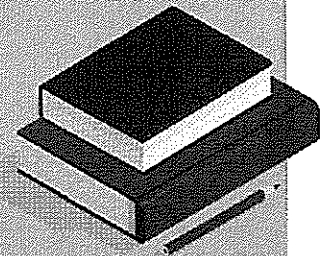
WHAT INSTITUTIONAL VALUES DO YOU WANT TO SEE INCORPORATED INTO YOUR TITLE IX PROCESS?

Every institution has a unique mission and set of values that guide the work that it does. These specific values are what draw students and staff to your campus, and can be reflected to those who visit campus or partake in your programs. For example, some campuses focus on small community, diversity and inclusion, religious tenants, experiential based learning, etc. What values does your campus focus on, and how can those be incorporated into your Title IX process? How are they already reflected in your Title IX process? Title IX may be federally mandated, but how we go about meeting those mandates should reflect the campus.



WHAT IS YOUR DESIRED OUTCOME FOR EVERY TITLE IX CASE/REPORT?

How would we describe a case in which we would say that all the Title IX requirements were met AND we served our purpose on campus. What does an ideal outcome in a Title IX case look like? We often seen Title IX issues as a lose-lose situation, and disregard the question of what desired outcomes look like. Regardless of the incident that triggered the process, we have a wealth of control over how next steps and the path forward look for someone. What are ideal outcomes for a Title IX case for all parties involved, for the campus as a whole? What is an ideal experience through the Title IX process?

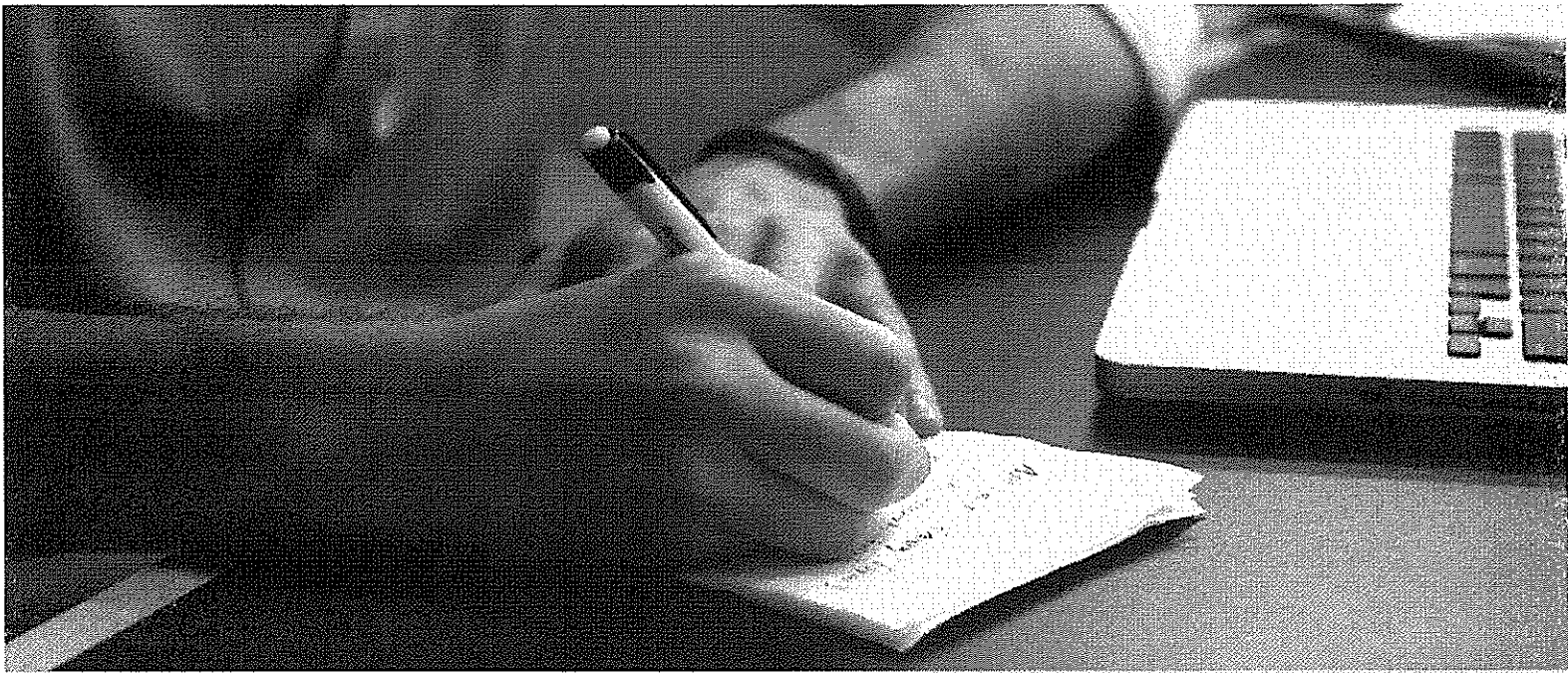




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Title IX
Hearing Officer Training
Online



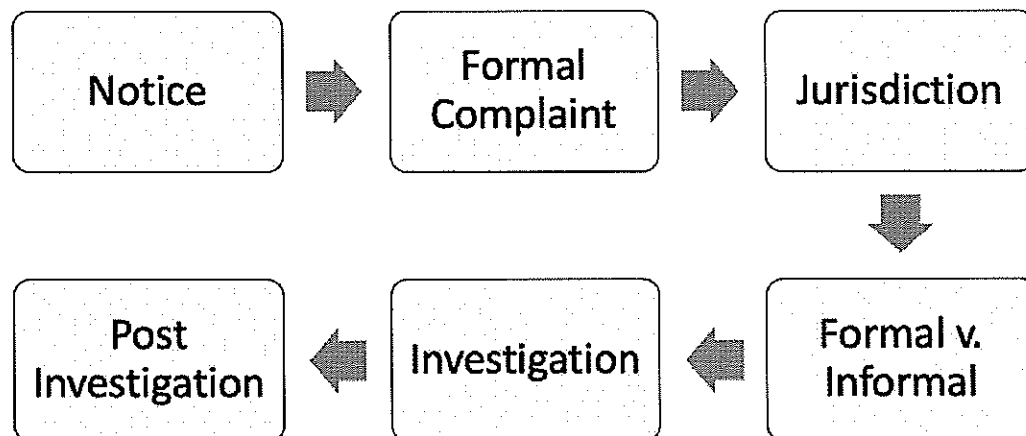
TITLE IX RESPONSE

Look at response starting with notice to finding, what is required in a Title IX investigation and what are the different models and practices for accomplishing them.

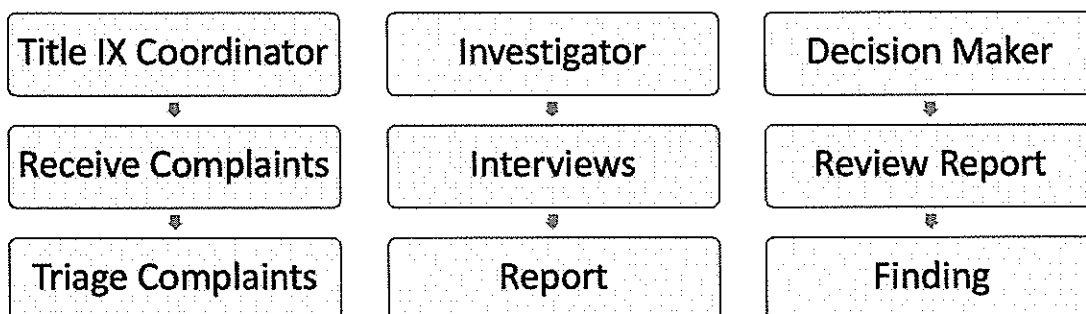
Learning Objectives:

- understand what stages of Title IX investigation and adjudication are from disclosure to finding and sanctions
- identify rights of parties and requirements under Title IX
- look at role of investigator, Title IX Coordinator and other actors within an investigation and adjudication

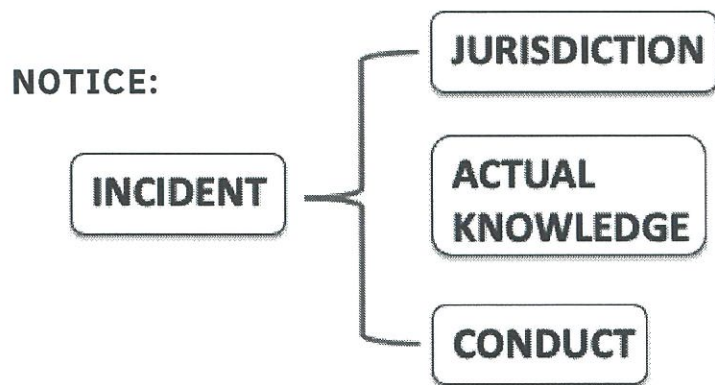
STAGES OF AN INVESTIGATION:



DECISION MAKER:



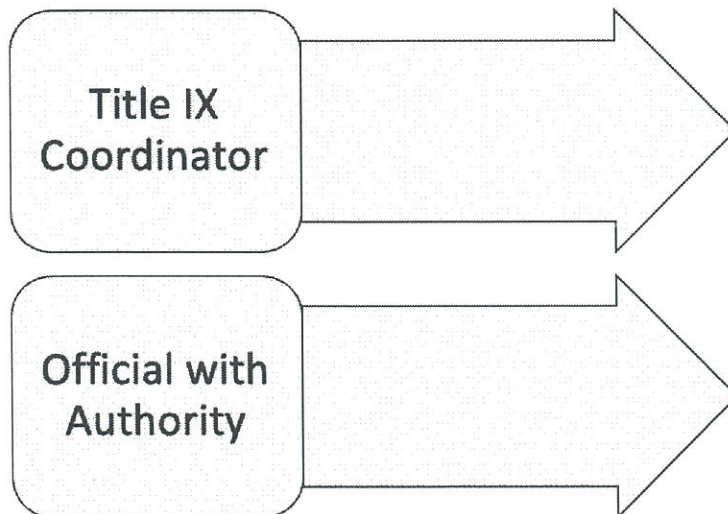
NOTES:



ACTUAL NOTICE:

- ① Student files complaint
- ② Student discloses/repots to responsible employee or Title IX Coordinator
- ③ Responsible employee witnesses violence
- ④ Social media and other third-party notification
- ⑤ Admissions essay

“[A]ctual knowledge means notice of sexual harassment or allegations of sexual harassment to a recipient’s **Title IX coordinator or any official of the recipient who has authority to institute corrective measures on behalf of the recipient**”



PROCESS COUNSELING:

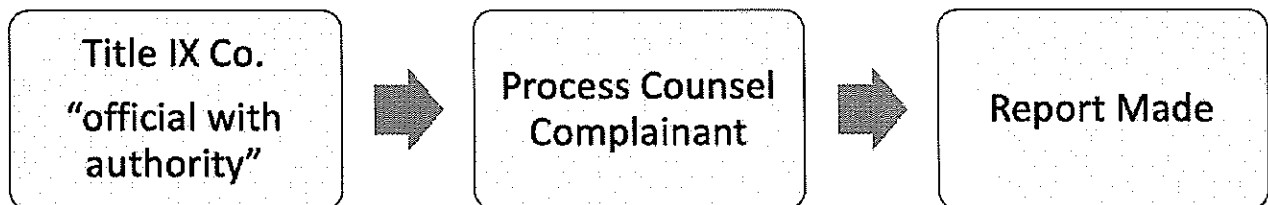
SUPPORT MEASURES:

“individualized services reasonably available that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other party while designed to ensure equal educational access, protect safety, or deter sexual harassment.”

SUPPORT MEASURES:

A “complainant” has the right to support measures regardless of whether there is a complaint being pursued.

Support measures must be coordinated by the Title IX Coordinator.



FORMAL COMPLAINT REQUIREMENTS:

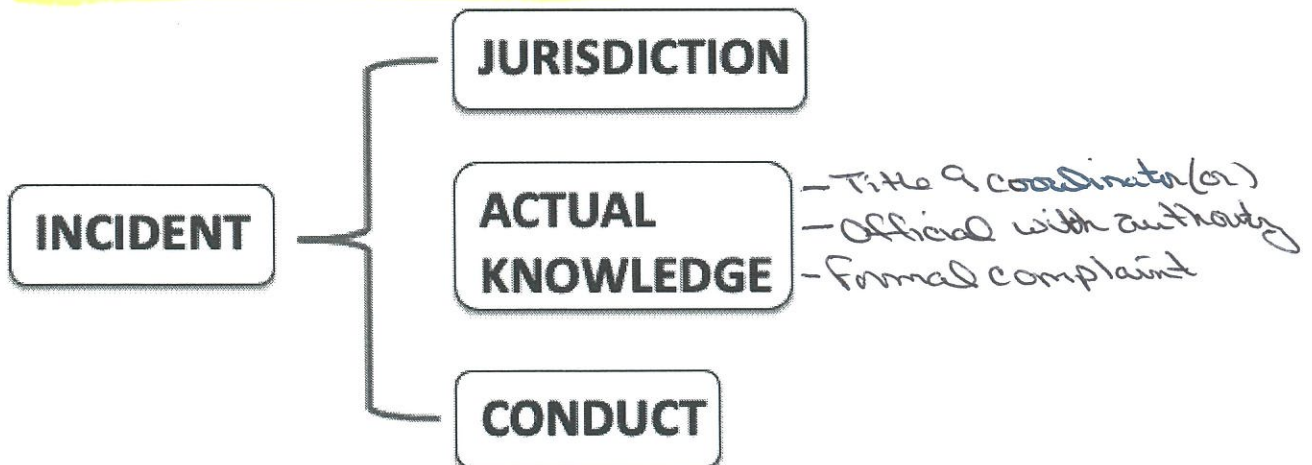
- Document
- Signed by complainant or Title 9 Coordinator
- Against respondent
- Request institution to investigate
- Electronic submission and signature allowed.

“[D]ocument filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.”

FORMAL COMPLAINT:

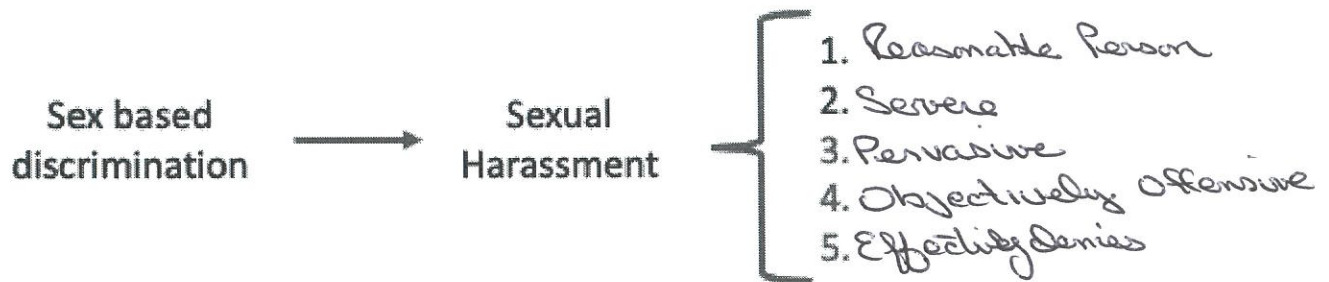
Document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegations of sexual harassment.

At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the education program or activity of the school with which the formal complaint is filed.



JURISDICTION:

- type of conduct
- educational program or activity
- person in the United States



"Clery Act/VAWA offenses are NOT evaluated for severity, pervasiveness, offensiveness or denial of equal educational access ... because such conduct is sufficiently severe..."

SEXUAL HARASSMENT:

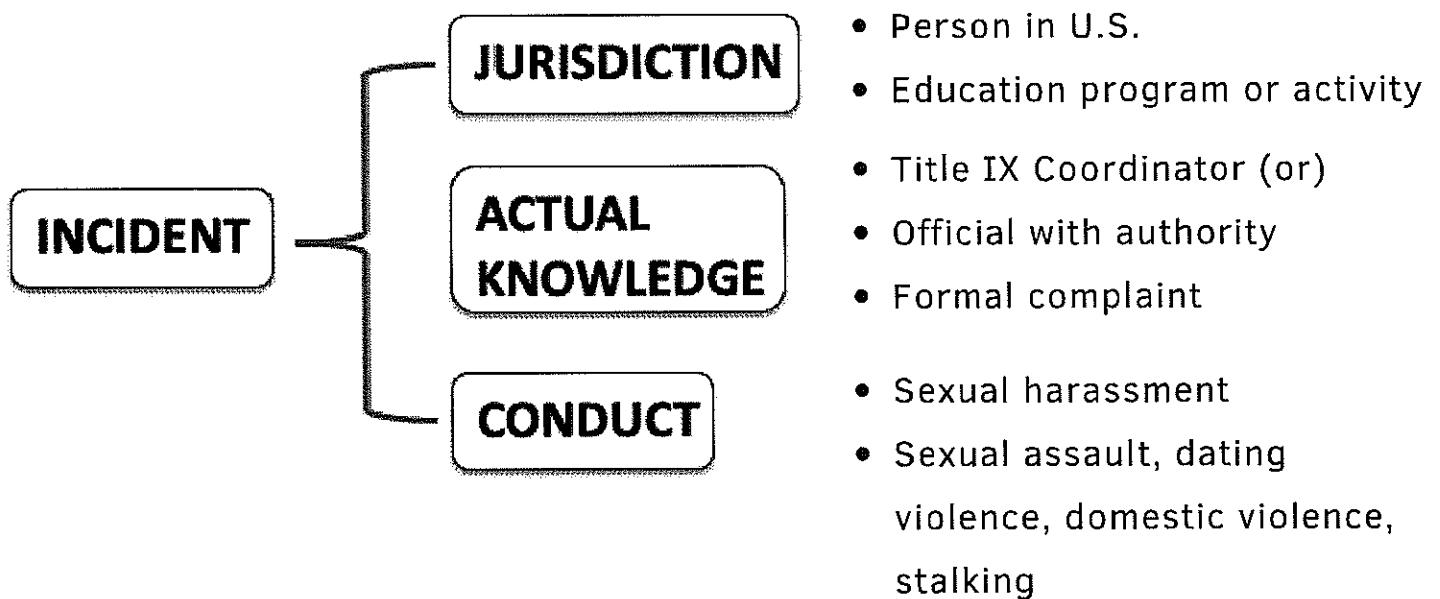
"Unwelcome conduct that a reasonable person would determine is so severe, pervasive and objectively offensive that it effectively denies person's equal access to education."

EDUCATION PROGRAM OR ACTIVITY:

- ① School exercised substantial control over the context in which the sexual harassment occurs
AND
- ② School exercised substantial control over the respondent,

PERSON IN THE UNITED STATES:

"Against a person in the United States"



INFORMAL V FORMAL COMPLAINT:

Process guided by:

- ① Complainant wishes*
- ② Serial perpetration*
- ③ Staff / Student*

INFORMAL PROCESS:

INVESTIGATION:

- ① All Title 9 personnel must be free from conflicts of interest or bias or against the complainants or respondents
- ② All formal complaints MUST be investigated and notice provided to all parties
- ③ Burden of gathering evidence and burden of proof is on school.

DISMISSAL OF COMPLAINT:

- If conduct definition or jurisdiction not met
- If complainant no longer accessing educational program or activity

MAY DISMISS WHEN:

- If complainant desires to withdraw complaint
- If respondent no longer enrolled or employed
- If school can't gather sufficient evidence to reach determination

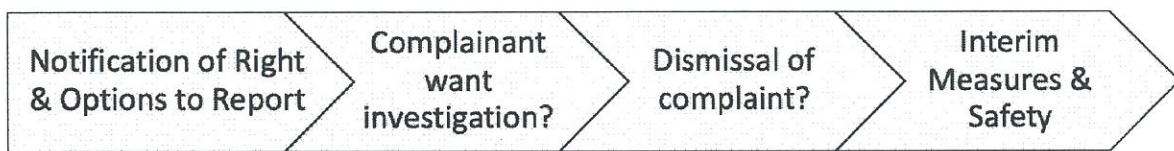
CONSOLIDATE COMPLAINTS:

If allegations arise out of the same facts

Note: Must offer both parties an appeal from a dismissal of a formal complaint.

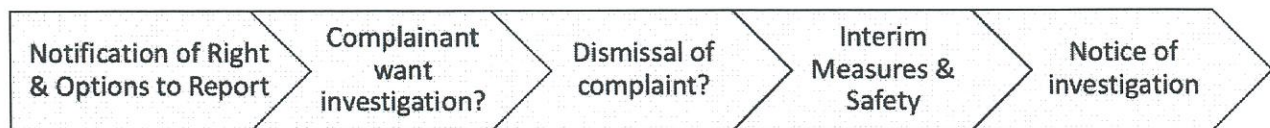
APPEALS:

- procedural irregularity
- newly discovered evidence
- conflict of interest or bias
- other*



INTERIM MEASURES:

- ① Victim has a right to access their education
- ② Safety planning and mitigation of future harm
- ③ "reasonable and appropriate"
- ④ Academic accommodations
- ⑤ No contact orders
- ⑥ counseling



WRITTEN NOTICE: (to all parties)

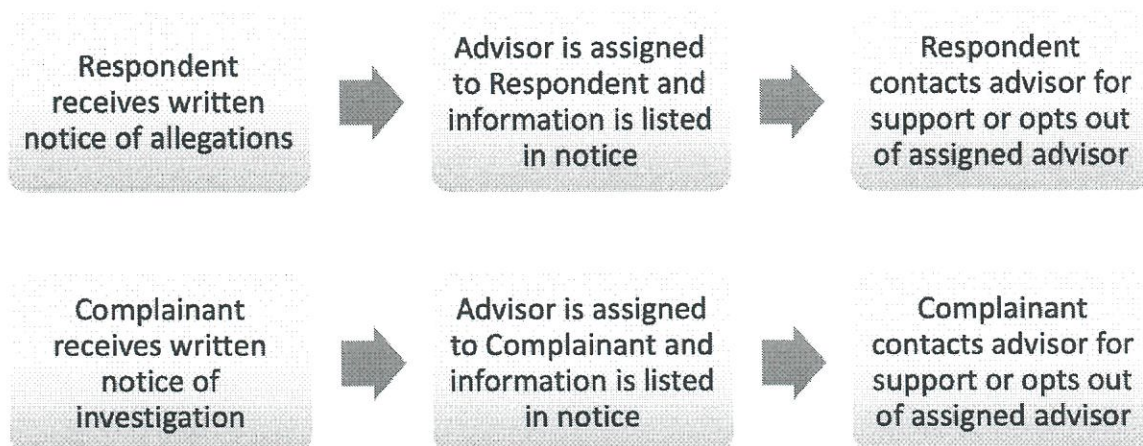
- ① Must be in writing to both parties and contain sufficient detail
- ② Must state that respondent is presumed not responsible for the alleged conduct.
- ③ Must inform parties that they may request to inspect and review evidence
- ④ Right to an advisor of choice.

ongoing notice requirement - additional allegations

ADVISOR OF CHOICE:

- ① Students have a right to have an advisor of choice provide the accuser and the accused with the same opportunities to have others present during any institutional disciplinary proceeding including the opportunity to be accompanied to any related meeting or proceeding by the advisor of choice.
- ② School may apply limitations to how the advisor may participate in process not limit the choice of advisor or presence for either the extent to which the advisor may participate in the proceedings.

OPT-OUT APPROACH: Roller Plant Rule



INTERVIEWS:

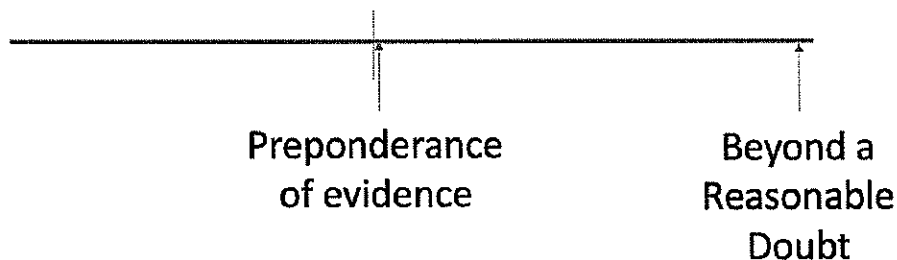
- ① Parties have a right to participate in interviews
- ② Parties have a right to provide evidence and witnesses
- ③ Written notice of interviews
- ④ Advisor of choice.

EVIDENCE:

Must send parties and their advisors evidence directly related to the allegations with at least 10 days for the parties to inspect, review and respond.

Preponderance of evidence

Clear and convincing



REPORT:

Give parties at least 10 days to submit a written response to draft report - measures must be taken to limit dissemination of that report

Complete report at least 10 days prior to hearing

HEARINGS:

- ① Burden of Proof on school
- ② Must have live hearings
- ③ Both parties must have equal opportunity to inspect and review evidence
- ④ Cross examination by advisor of choice - relevance decide by decision maker.
- ⑤ Federal case shield - unless offered to prove that someone other than respondent committed misconduct
- ⑥ Investigator may present report.

REMEDY:

Title IX evaluates a school's selection of supportive measures and remedies based on what is not clearly unreasonable. And does not second guess a school's disciplinary decisions.

- ① Required to be provided to complainant if finding of response
- ② Maintain complainant's equal access
- ③ May include supportive measures
- ④ Don't need to be non-punitive
- ⑤ Don't need to avoid burdening the respondent

~~Complainant~~ Complainant

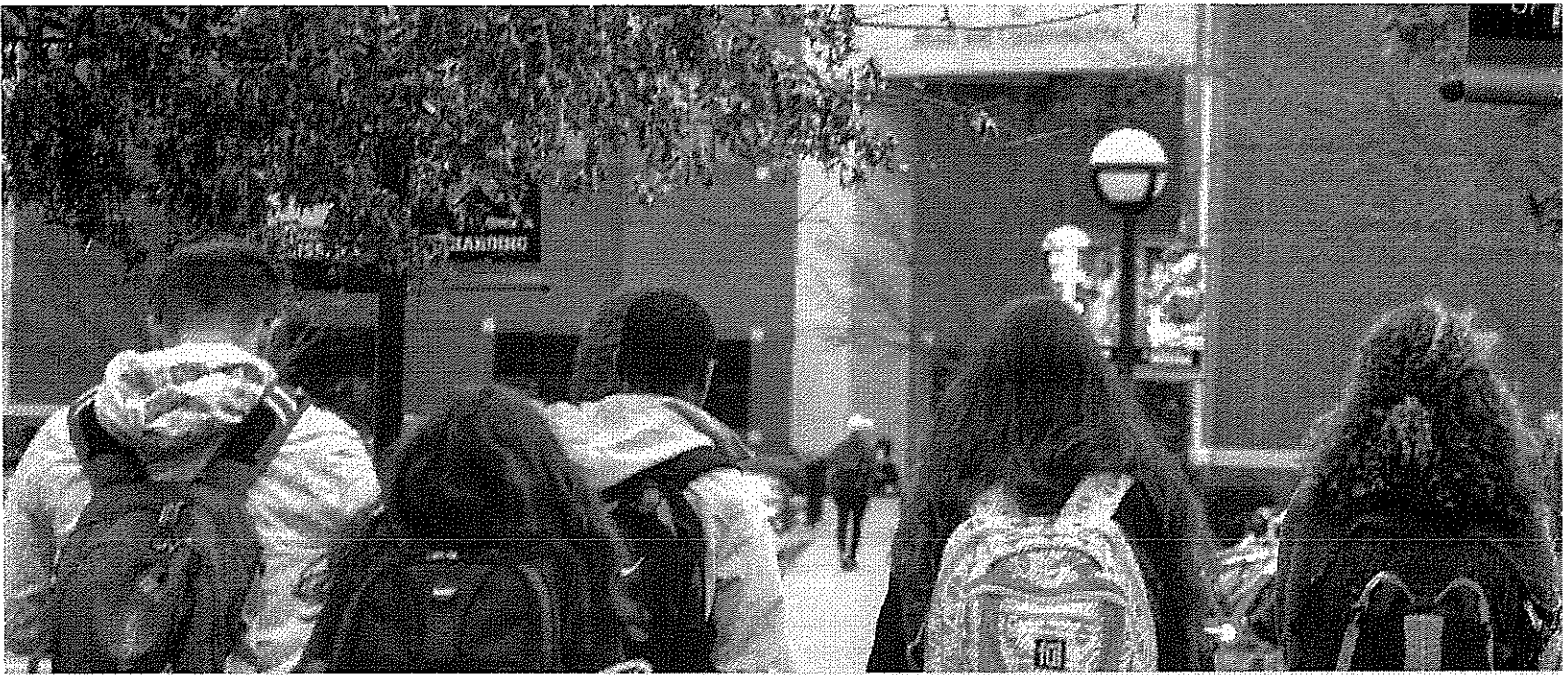
"[Title IX] evaluates a school's selection of supportive measures and remedies based on what is not clearly unreasonable.... And does NOT second guess a school's disciplinary decisions..."

→ OVER →

FINAL REPORT: Decision maker provides final notice

- ① Written determination by decision maker.
- ② Keep records for minimum of 3 years.
- ③ Must document the basis for conclusion
- ④ Must document measures taken to restore or preserve access to educational program or activity

CLOSING A CASE:



DYNAMICS OF INTERPERSONAL VIOLENCE ON CAMPUSES

A look at sexual harassment, sexual assault, stalking and dating and domestic violence as it affects students on campus.

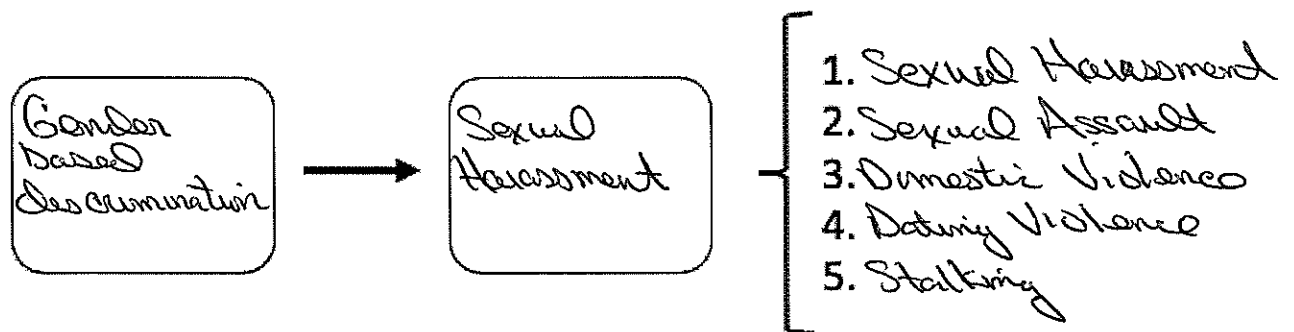
Learning Objectives:

- prevalence rates on campuses and nationally
- types of interpersonal violence included in Title IX, VAWA and Clery
- dynamics of stalking on campus
- identifying and eliminating barriers to reporting within the Title IX process

DYNAMICS OF VIOLENCE

"INTERPERSONAL VIOLENCE" AND OTHER TERMS:

TYPES OF IPV UNDER TITLE IX:



PREVALENCE RATES IN SCHOOLS:

Nationally:

1 in 4 women will be sexually assaulted in their lifetime.

Nationally on Campuses:

1 in 5 women will be sexually assaulted by time they finish college.

VULNERABLE POPULATIONS ON CAMPUSES:

LGBTQ students

Romantic Students

Non-Traditional Students

International Students

deaf and hard of hearing

Students w/ disabilities

Alcohol and Drug users

students of color

Students Experiencing homelessness

Girls

housing instability

Students in Sex Work

immigrant and refugee

Non-English speaking

INTERSECTIONS OF VIOLENCE:

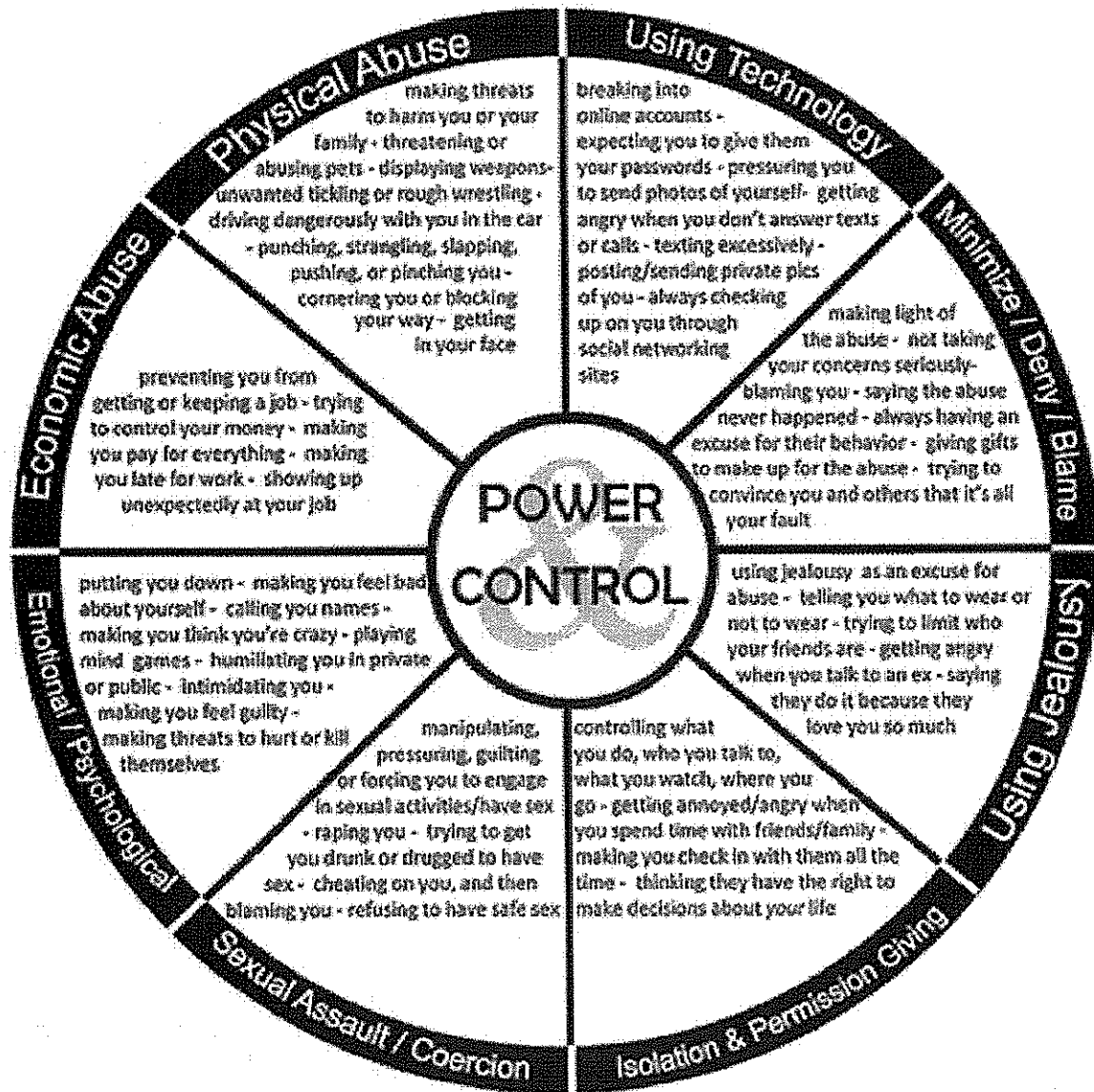
Physical Violence: 3.7% of 11th graders report physical abuse by a partner in the last 12 months

Stalking: About 1 in 5 female victims and 1 in 14 male victims experienced stalking between the ages of 11 and 17

INTERSECTIONS OF VIOLENCE:

The Power and Control Wheel

Adapted from the Domestic Abuse Intervention Project, Duluth, MN



WHY DON'T WE SEE MORE STUDENTS COMING FORWARD?

MESSAGING ABOUT VIOLENCE:

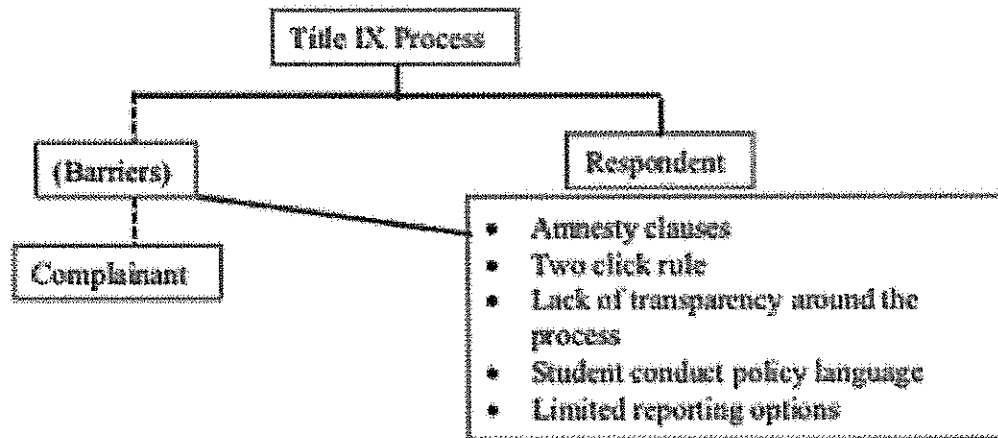
MESSAGING ABOUT CONSENT:

MESSAGING ABOUT VICTIMIAZATION:

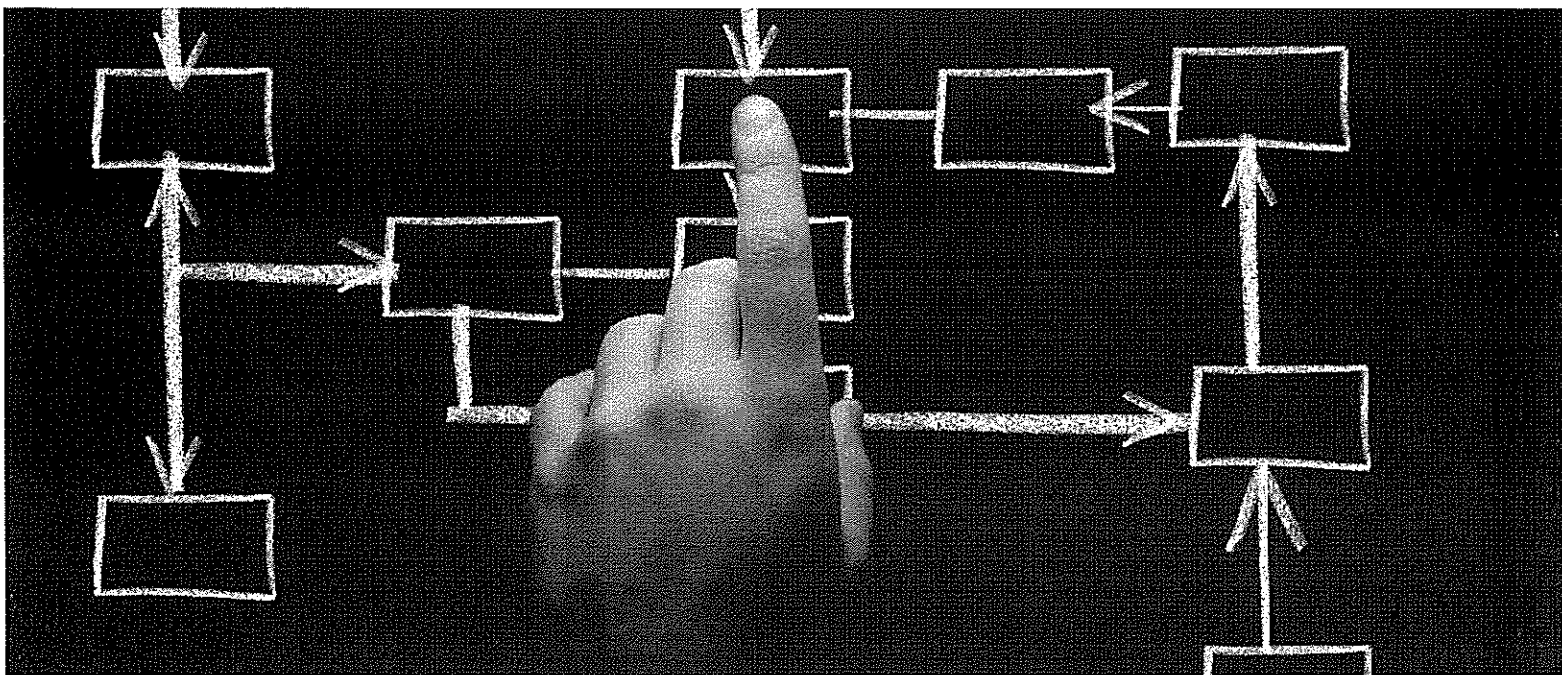
MESSAGING ABOUT THE CRIMINAL JUSTICE SYSTEM:

MESSAGING ABOUT CAMPUS RESPONSE SYSTEMS:

INSTITUTIONAL BARRIERS TO REPORTING:



ELIMINATING BARRIERS TO REPORTING:



BIAS, EQUITY & RESPONDENTS

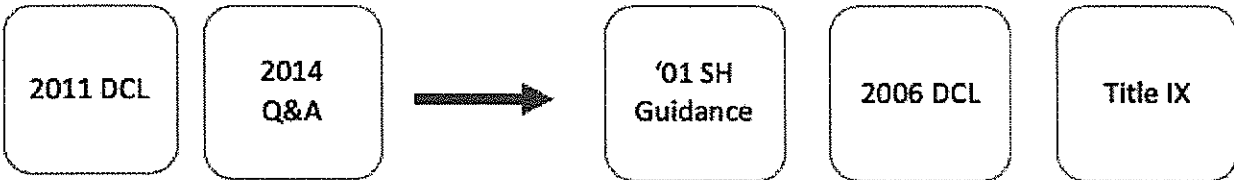
Identifying personal bias as an investigator, equity as defined by Title IX in both investigations and policies as well as best practices in serving respondents.

Learning Objectives:

- develop clear understanding of different types of bias that may affect an investigation.
- respondent rights within an equity lens
- definition of equity within Title IX
- best practices in striving for equity within Title IX

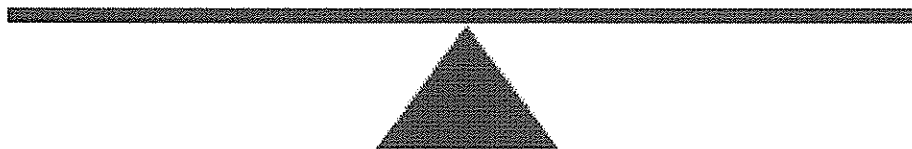
BIAS, EQUITY & RESPONDENTS

RECENT GUIDANCE:



2017 DCL CALL TO ACTION:

"[Procedures] lack the most basic elements of fairness and due process, are overwhelmingly stacked against the accused..."



WHAT IS EQUITY? *Equitable NOT Equal*

EQUITY NOT EQUALITY:

1. individualized
2. appropriate

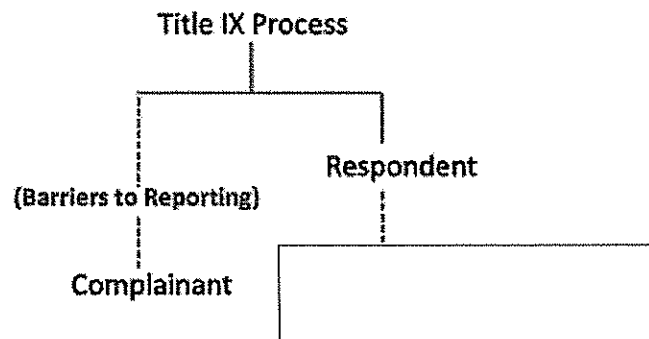
EQUITY VERSUS EQUALITY:

QUESTIONS TO ASK:

1. access to the process
2. long-term support and "success"

OTHER VARIABLES:

Race and ethnicity, institutional knowledge, generational knowledge, resources, familial support, peer group support.



REPORTING PARTY RIGHTS:

RESPONDING PARTY RIGHTS:

EQUITY IS FACIAL AND ABSTRACTLY INDIVIDUALIZED:

1. policies and protocols
2. support services

FRAMEWORKS TO UTILIZE:

- student-centered
- trauma-informed
- critical race theory
- restorative justice

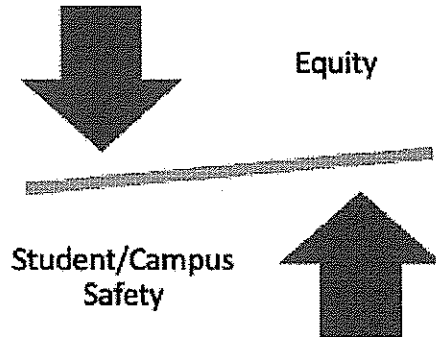
WHAT IS BIAS?

TYPES OF BIAS:

FACIAL EQUITY FOR RESPONDENTS:

- interim measures
- appeals
- advisors
- opportunity to provide evidence and witnesses
- written notice

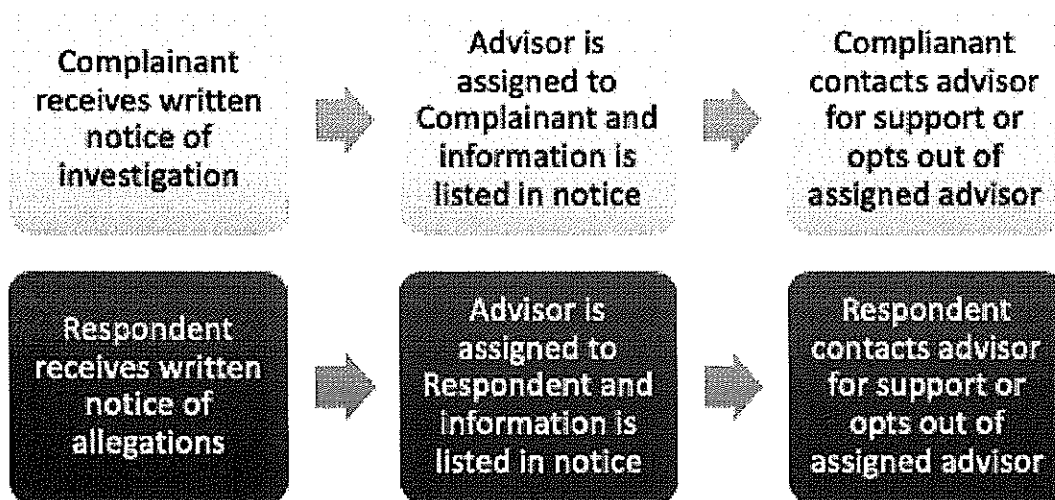
CHALLENGES TO EQUITY:



NOTIFICATION OF RIGHTS: All students involved in the complaint resolution process should be notified of their rights, options and services available to them. Campuses should have this information easily accessible to all students in writing.

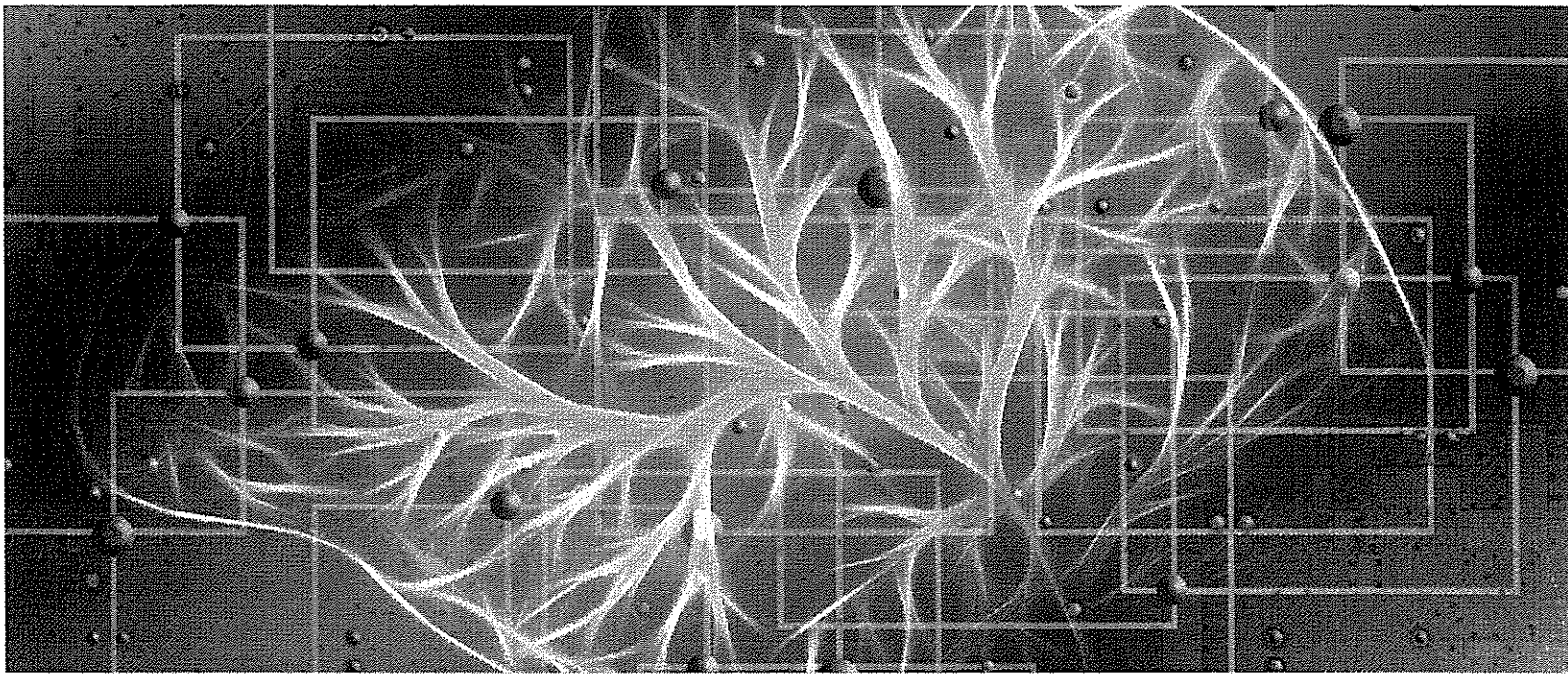
ADVISOR OF CHOICE:

"OPT-OUT MODEL"



OUTSIDE ADVISORS:

SUPPORT SERVICES:



THE NEUROBIOLOGY OF TRAUMA

How trauma affects the brain including acute trauma, memory recall, long term effects of trauma, reporting and process of information.

Learning Objectives:

- identify types of trauma and their effects on students
- understand how trauma affects memory and impacts physiological changes
- adopt trauma-informed skills to mitigate impacts of trauma on students within the Title IX process

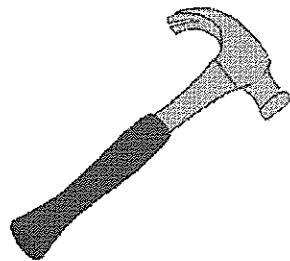
NEUROBIOLOGY OF TRAUMA

WHY LEARN ABOUT TRAUMA?

"A BRAIN IN TRAUMA IS NOT A LEARNING BRAIN."

EVIDENCE-BASED INVESTIGATIONS: Utilizing tools as interviews, collection of evidence, credibility assessments and corroboration of facts to come to conclusions of fact. *It is not:* An interrogation leading to pre-determined truths using evidence and interviews to "trick" parties. Always traumatic for the parties involved.

TRAUMA-INFORMED INVESTIGATIONS: A framework applied to interviews, interview spaces, interactions between parties and administration format of resources and establishments of resources that ensures trauma and the mitigation of its impacts are taken into consideration. *It is not:* Coming to findings of responsibility due to existence of trauma, ignoring facts and evidence to give weight to trauma impacts.



Evidence-based

- Objective
- Fact finding
- Neutral

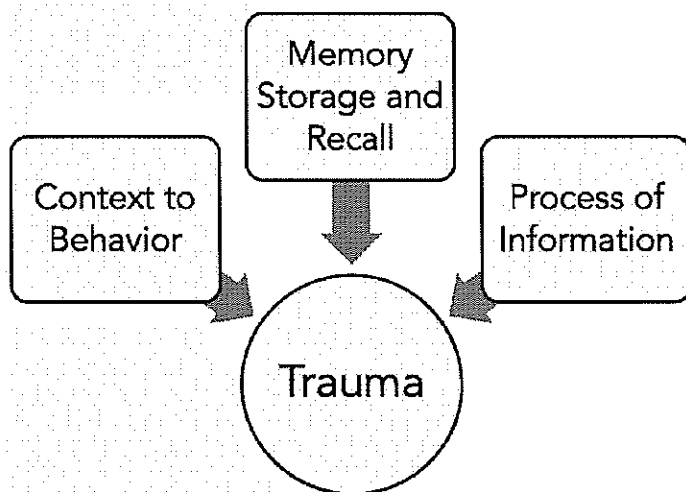
Trauma-informed

- Services
- Interviews
- Processes & policies



WHY UTILIZE TRAUMA-INFORMED PRACTICES?

"A BRAIN IN TRAUMA IS NOT A LEARNING BRAIN."



WHAT IS TRAUMA?

A more extreme version of stress, perceived as life threatening and evoking fear, helplessness and even horror.

COMMON TYPES OF TRAUMA

1. Secondary Trauma:
2. Vicarious Trauma:
3. Historical Trauma:
4. Institutional Trauma:

MAIN TAKEAWAYS:

ADVERSE CHILDHOOD EXPERIENCES

The prevalence of adverse childhood experiences, nationally, by state and by race or ethnicity, by Vanessa Sacks and David Murphey, Feb 12, 2018. Study based on the 2016 National Survey of Children's Health (NSCH).

ADVERSE CHILDHOOD EXPERIENCE: Potentially traumatic experiences and events, ranging from abuse and neglect to living with an adult with a mental illness.

NATIONALLY:

- 1 in 10 U.S. children have experienced at least one traumatic experience.
- 1 in 4 U.S. children live in families that find it hard to pay for necessities like food or housing very or somewhat often.

Identity and ACE's:

Pacific Region (including Oregon)	
White NH	63%
Black NH	51%
Asian NH	75%
Other NH	59%
Hispanic	53%

HOW ACE's AFFECT OUR STUDENTS:

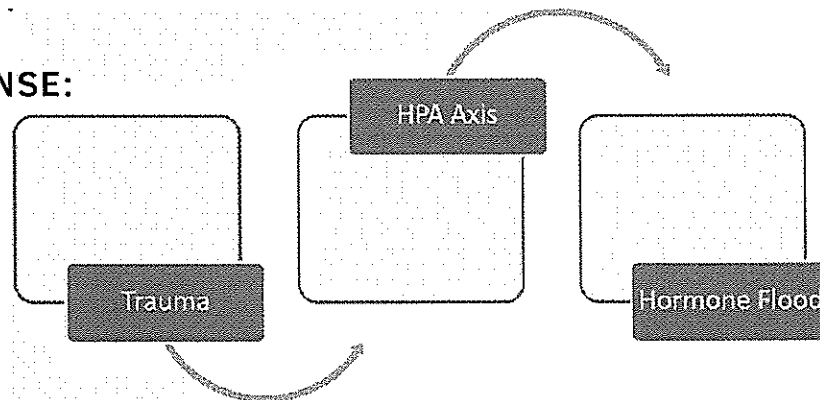
6 PRIMARY CAUSES OF TRAUMA:

1. Betrayal
2. Extreme Fear/Terror
3. Blitz/Surprise Attack
4. Blame
5. Lack of Support
6. Invalidatin

WHAT HAPPENS IN THE BODY?

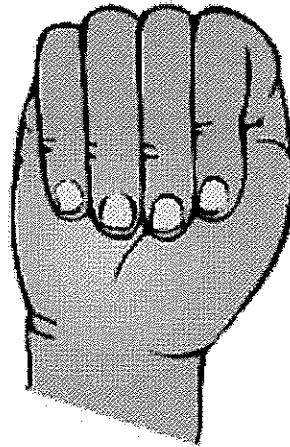
- physiological changes
- complex thought and decision making
- memory affected
- fight or flight

TRAUMA RESPONSE:

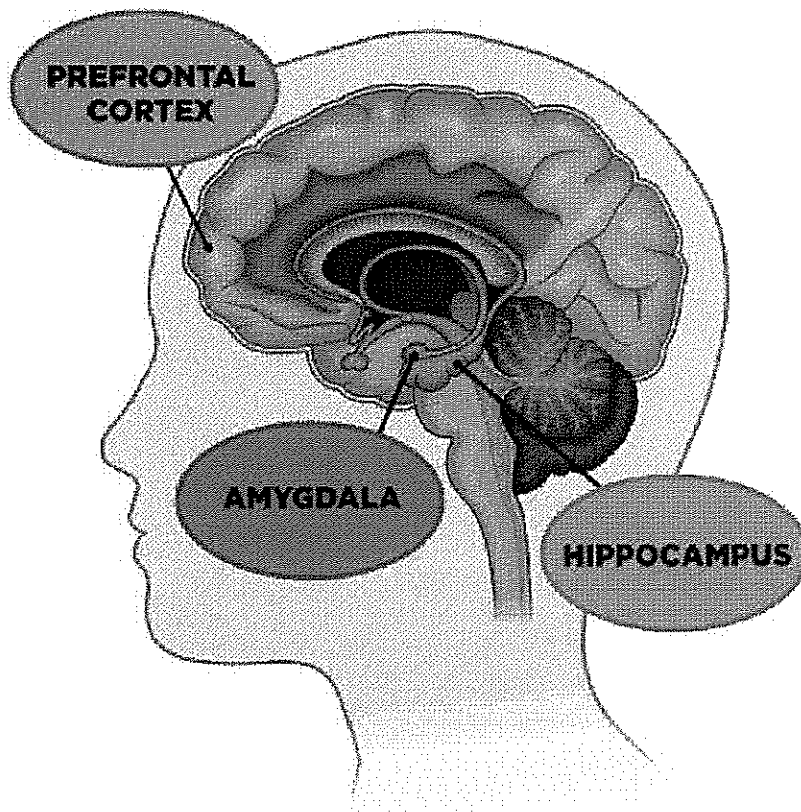
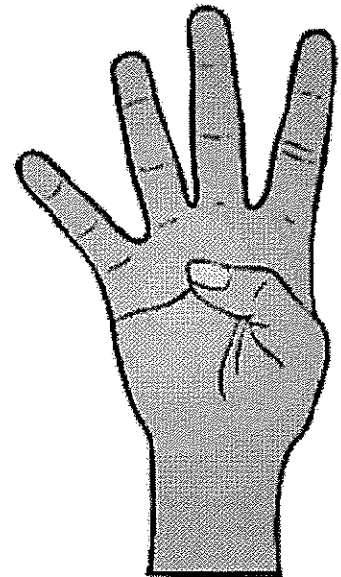


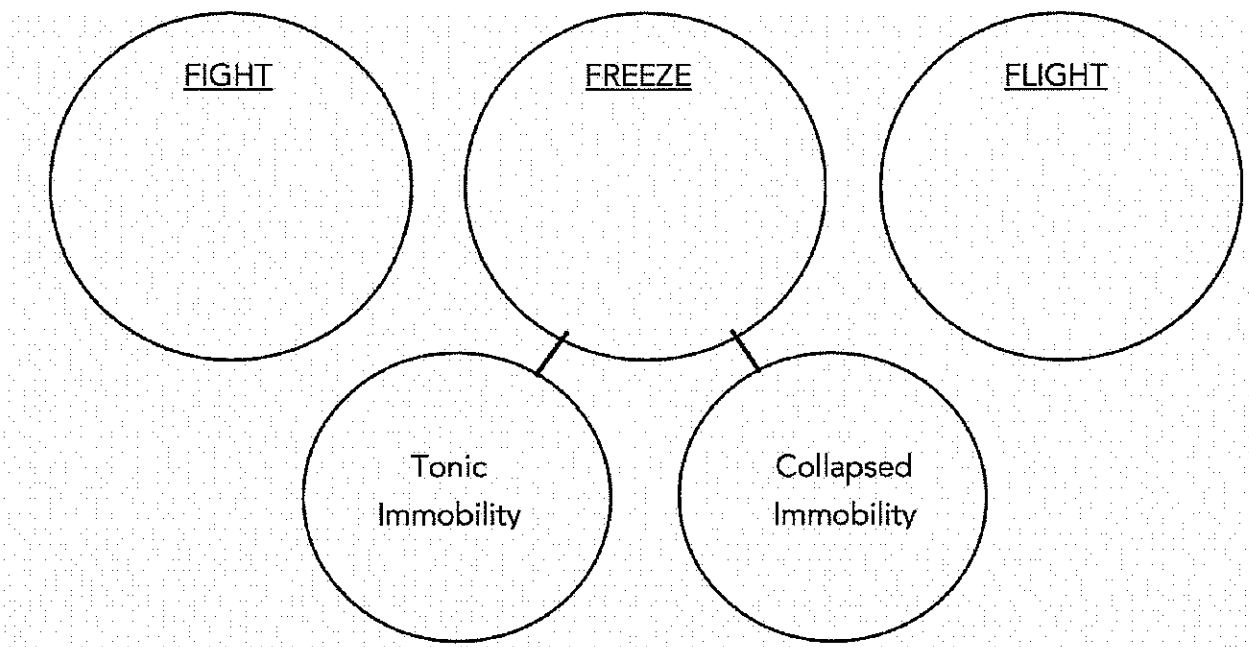
Hormone Flood		
Hormone	Hormone Function (+)	Hormone Function (-)
Catecholamine (adrenaline)		Too much causes hyperventilation, high blood pressure, impaired rational
Cortisol (hydrocortisone)		
Opioids	Prevents anticipated pain; natural morphine	Numbs the body to pain, cause flat affect, slows memory. Too much will conflict with catecholamines and cortisol. Could cause frozen fright.
Oxytocin	Promotes good feelings/manage emotions	

TRAUMA AND THE BRAIN

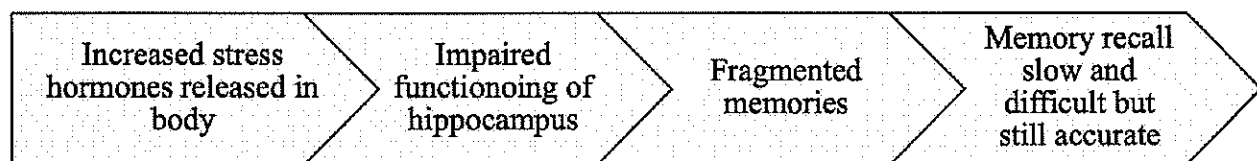


→ Prefrontal cortex
P.F.C.
"THE WISE LEADER"

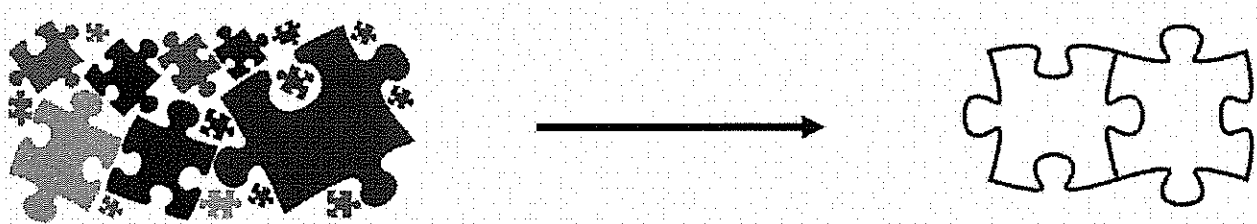




TRAUMA AND MEMORY:



PUTTING TOGETHER A PUZZLE:

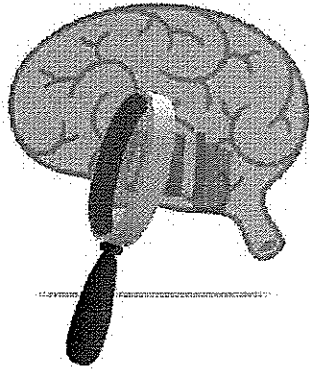


PUTTING TOGETHER A PUZZLE:

TIX Education Specialists

"Bridging compliance and best practice."

Trauma and the Brain



Why learn about trauma and the brain?

Integrating trauma-informed practices into our policies and everyday practices is critical to creating a process that not only responds to complaints of harassment and violence, but serves people best.

Adverse Childhood Experiences

Nationally, 1 in 10 children have experienced at least one traumatic experience according to the National Survey of Children's Health.

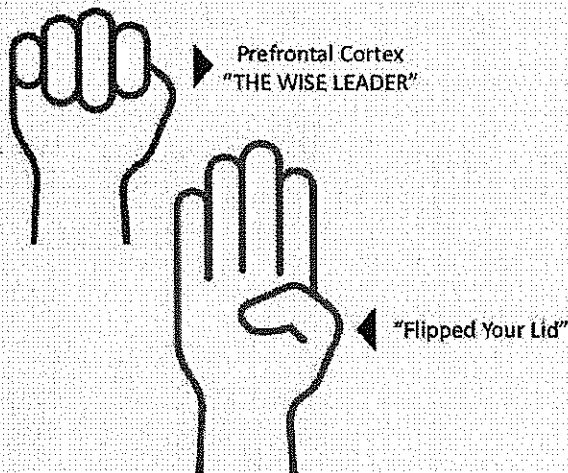
We often discuss trauma in terms of acute trauma after an assault. It's important to know that students can experience a wide spectrum of traumas that can intersect with each other.

Vicarious Trauma

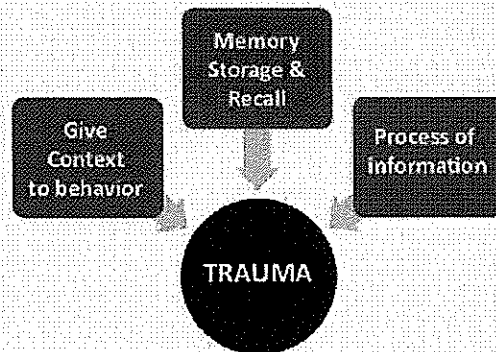
Historical Trauma

Institutional Trauma

Cultural Trauma



Better understanding trauma and how it affects the brain gives us an additional tool to better serve students and staff through the Title IX process. Trauma can affect the brain in many ways.



Tips to mitigate institutional trauma triggers:

- Check website search keywords to include common terms for Title IX conduct such as "sexual assault" and "rape"
- Ensure that Title IX Coordinator contact information and reporting information is easily accessible
- Use vacation responders on email to let students know if you are absent from email or if you frequently have delayed email responses
- Write down information given verbally in meetings including dates and times of next meeting
- Avoid terms such as "remember," "why," and "alleged" that might have negative connotations

| Web: tixedu.com | Phone: 503-960-8261 | Email: admin@tixedu.com |

This resource is not intended as legal advice nor should it be treated as such. This resource is meant to provide an overview for the 'Neurobiology of Trauma' webinar provided by TIX Edu. For questions please contact us.

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CONDUCTING HEARINGS

How to conduct hearings including conducting cross-examination and determining relevance and reaching determinations, remedies and sanctions.

Learning Objectives:

- determining relevance in cross-examination
- understand rights and options related to hearing
- identify roles and responsibilities of decision-maker(s)
-

CONDUCTING HEARINGS

"LIVE" HEARINGS

CREATING A RECORDING:

- VIDEO
- AUDIOVISUAL
- TRANSCRIPT

VIRTUAL HEARINGS:

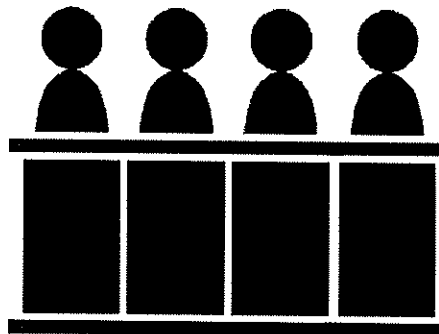
WRITTEN NOTICE OF HEARING:

SCHEDULING HEARING:

SINGLE DECISION-MAKER MODEL:



DECISION-MAKER(S) PANEL:



DECISION-MAKER(S):

- Can't be Title IX Coordinator
- Can't be investigator

ADVISOR OF CHOICE:

“[NOTWITHSTANDING THE DISCRETION OF THE RECIPIENT... TO OTHERWISE RESTRICT THE EXTENT TO WHICH ADVISORS MAY PARTICIPATE IN THE PROCEEDINGS.]”

If party doesn't have advisor at hearing:

- Institution must provide free of charge
- advisor of institution's choice
- May be but does NOT need to be attorney
- Party can NOT waive having an advisor

SEPERATION OF PARTIES:

EVIDENCE:

Make all evidence subject to the parties' inspection and review available at the hearing to give parties opportunity to refer to evidence during hearing.

Exception to evidence:

- Medical or psychological records can only be used with the party's voluntary consent.
- Privileged materials

INVESTIGATIVE REPORT:

“The Department notes... [the regs] contemplates parties’ equal right to cross-examine any witness, which could include an investigator and.... Grants parties equal opportunity to present witnesses including fact and expert witnesses, which may include investigators.”

CROSS-EXAMINATION:

“[A]ll relevant questions and follow-up questions, including those challenging credibility.”

- Question asked of parties and witnesses
- Directly, orally and in real time
- By party’s advisor of choice – NEVER by party
- “relevant, respectful and non-abusive”

RULES OF DECORUM:

RETALIATION:

RELEVANCE:

A question that goes to prove or disprove an
outcome determinate fact.

REDUNDANCY:

"RAPE SHIELD":

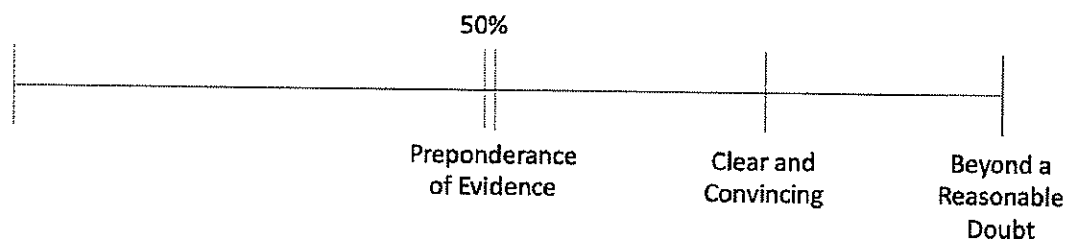
Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are offered to prove that:

- someone other than the respondent committed the conduct alleged (OR)
- complainant's prior sexual behavior with respect to the respondent and are offered to prove consent

DETERMINATION OF RESPONSIBILITY:

STANDARD OF EVIDENCE:

Standard of evidence:



DECISION-MAKER(S) REPORT:

- Allegations
- Procedural steps taken from receipt of complaint– determination
 - Notifications to parties
 - Interviews with parties
 - Methods used to gather evidence
 - Hearings held
- Findings of fact that support determination
- Conclusions regarding application of institution's code of conduct to the facts
- Statement of rationale for result of each allegation
 - Sanctions
 - Remedies
- Permissible bases for appeal available