AY 2014-2015
Annual Assessment
of Effectiveness of Anti-Harassment Efforts, Including Proposed Recommendations for Improving the University's Anti-Harassment Program
Table of Contents

A. Background and Summary ........................................................................................................... 2
B. Review of 2014 Climate Survey ................................................................................................ 5
   1. Sexual Violence Experiences ................................................................................................. 5
   2. Physical Violence Experiences ............................................................................................. 6
   3. Familiarity with Services ......................................................................................................... 6
   4. Barriers to Reporting ................................................................................................................. 6
   5. Recommendations from the 2014 Climate Survey: ................................................................. 7
   6. Implementation 2013 Climate Survey Recommendations ....................................................... 8
C. Review of Reports and Responses ................................................................................................ 9
D. Additional Evaluation and Analysis of Data Collected ................................................................. 14
A. Background and Summary

This annual report highlights and assesses the effectiveness of anti-harassment efforts at the University of Montana. It covers the period from August 16, 2014, through May 31, 2015. Safety is an essential and ongoing priority for our learning environment. Efforts focus on education and prevention, clear policies, reporting, collaboration across the campus and across the Missoula community, and student and employee involvement. Collaboration continues between University groups such as the Student Advocacy Resource Center (SARC), the University Police Department (UMPD), the Title IX Coordinator, the Dean of Students, Residence Life professional and student staff, and academic advisors. In addition, the University remained active in the community coalitions formed to prevent and respond to sexual violence and discrimination in Missoula, Montana. In April of 2015, Jon Krakauer released his book, “Missoula: Rape and the Justice System in A Small Town.” This release increased conversations and media focus on the issue of sexual violence in Missoula. Many students attended the community forum where the author spoke in May 2015.

In addition, the legal landscape and policy focus nationwide continues to evolve. For example, the federal proposed Campus Accountability and Safety Act offers a snapshot of future regulations. The Violence Against Women Act modified campus obligations related to student rights, reporting, and record keeping. The White House Task Force issued additional guidance. At the end of spring semester, in April 2015, the Office for Civil Rights in the Department of Education issued additional comprehensive guidance on the role of the Title IX Coordinator. This information further assisted the University in adjusting its policies and training in accordance with that guidance. Efforts included the following:

- Web Resources: A new comprehensive “SafeUM” button on the University home page gives immediate access to information, resources and online reporting.
- A new Title IX webpage was created and hosted on the Equal Opportunity website. That page contains information on: Reporting, Title IX at the University of Montana, the University Investigation Process, What Employees Need to Know, What Complainants Need to Know, What Respondents Need to Know, and Title IX Resources.
- Posters and flyers have been distributed on “Reporting Sexual Assault, Sexual Harassment, and Interpersonal Violence at the University of Montana,” and “Resources Available for Students.” They cover information on mandated reporting, confidential resources, the Title IX Coordinator, and how to report.
- Training occurred on the University’s Discrimination, Harassment, Sexual Misconduct, Stalking, and Retaliation policy and procedures.
- Notices and information about the Title IX Coordinator were widely disseminated to the University community.
- University personnel involved in processing, investigating, or resolving complaints of sexual misconduct received comprehensive training, as did all Resident Assistants, University Police, Curry Health Center employees, SARC, Academic Advisors, and other campus personnel who are likely to receive reports of relationship violence, sexual misconduct, or sexual violence.
• All University employees are required to take an online tutorial regarding discrimination, harassment, and their responsibility to report information to the Title IX Coordinator.

• The University Council on Student Assault (UCSA) subgroup meets to conduct monthly case reviews of reports of sexual misconduct, relationship violence, sexual violence, and sexual harassment involving students.

• The second Safe Campus Survey (campus climate survey) was conducted between October 21, 2014 and December 4, 2014, and has been evaluated by a working group of professionals who report back to the UCSA on lessons learned and on recommendations.

• On October 1, 2014, three University employees—the Campus Prevention Coordinator and two UMPD Officers—received awards from the Missoula Family Violence Council for their exemplary service to victims of intimate partner violence and sexual assault.

• The University continued involvement in local multidisciplinary agency boards and councils in the community such as Just Response, a community criminal justice system response to domestic violence and sexual assault. In April 2015, Just Response, with University leadership, updated a new 29-page resource guide, “It’s Your Call 911: Our Immediate Response to Sexual Assault is ‘How Can We Help?’” This resource guide, first published in 2012, contains information about community and campus resources as well as risk reduction and prevention tips.

• University Police implemented and trained its personnel on a new Sexual Assault Investigation Policy. The Policy includes consistent referrals to the Title IX Coordinator and other resources.

• University Police have completed more than 900 hours of training on sexual assault response, investigation, supervision, documentation, and campus and community resources in order to ensure a victim-centered investigation.

• A new position shared between the Office of Equal Opportunity and UMPD was created to oversee the sharing of information between the police and Title IX Coordinator.

• The University hired a new Title IX and Civil Rights Investigator to work in the Office of Equal Opportunity and Affirmative Action.

• All new Griz Cards (student IDs) are printed with contact information for UM Police, Title IX Coordinator, Dean of Students, and SARC.

• SARC expanded its “Don’t Cancel That Class” program, a national model providing a trained substitute for instructors who would otherwise cancel a class for travel or illness. Classes address 1) How to be a first responder to relationship violence, a sexual assault, or stalking situation; 2) Healthy relationship tips and recognizing red flags in unhealthy relationships; and 3) Bystander intervention and self-care instructions. Classes are primarily offered by graduate interns via SARC.

• Revised student outreach training continued via Personal Empowerment Through Self-Awareness (PETSA), UM’s online specialized tutorial for sexual assault prevention; AlcoholEdu via Everfi, an online risk reduction module that also reinforces sexual assault prevention; Beer Goggles (via Curry Health Center’s Wellness program), an in-person training program addressing alcohol consumption and safety tips to avoid risk factors.
regarding sexual assault on campus; and bystander intervention role play skits during orientation provided by UM Advocates via Residence Life.

- “Slice of Life” orientation skits hosted by “New Student and Family Programs” and Residence Life occur during each of the four-day orientation sessions (June and August prior to freshmen or other new students entering each academic year). Content includes role-plays of bystander situations that model prevention of a potential sexual assault situation.

- “Beer Goggles” is a multimedia risk reduction presentation using skits regarding alcohol and drug use, and safe dating/relationship tips produced and implemented by the Wellness Department of Curry Health Center. These were conducted September 8-9, 2014, and reached 1,591 students. Students were sent a post-survey with 378 total responses to the survey.

- “AlcoholEdu,” a product of EverFi, was implemented across the Montana University System beginning Fall 2014 (mandatory for all incoming students under 21; going forward, it is mandatory for all incoming students). It contains prevention and risk reduction tips for staying safe with alcohol consumption as it relates to increased risk for sexual assault perpetration and victimization.

- “Not in Our State Summit,” third annual event held in 2014 at MSU Billings; fourth annual event will be held at the University of Montana, Missoula, in the University Center in 2015.

- “Make Your Move Missoula” expands to campus as “Make Your Move UM.”

- Make Your Move Task Force formed for collaboration with YWCA and Missoula City/County Relationship Violence Services to increase social marketing campaign outreach and enhance social media presence. This model has been replicated by the University of California at Santa Barbara, the Edmonton (Alberta) Police Service, and others. Make Your Move to End Sexual Violence campaign posters have appeared in bathrooms in Washington-Grizzly Stadium, Dahlberg Arena, all residence hall bathrooms, and in major classroom building bathrooms in Spring 2015.

- Student Advocacy Resource Center (SARC) received an Avon Foundation grant for $5,000 from September 1, 2014 to August 30, 2015, for campus bystander intervention programming (1 of 30 colleges in the U.S. who received this award). Advocates for Non-Violence (ANV) are undergraduate and graduate students who plan prevention events and rallies and serve as peer educators to deliver bystander intervention training for students along with their mentors.

- Eight-hour training for peer educators with 22 participants from the Student Advocacy Resource Center Advocates for Non-Violence (ANV) on November 2, 2014.

- Bystander training for mentors of peer educators occurred in January 2015. Fourteen trainers received 2-3 hour refresher training on bystander intervention.

- Bystander training for student residents in Residence Halls occurred in February 2015.

- Fraternity and Sorority Involvement bystander training occurred in March and April 2015.
• Additional Athletics Department bystander training occurred in April and May 2015.

• Thirteen courses taught on campus directly address the topics of relationship violence and/or sexual assault, including undergraduate and graduate level three-credit courses (e.g., Gender and Society, Psychology of Family Violence, Intimate and Family Relationships, Gender and Communication, and Human Sexuality). More than 500 students were enrolled in these courses.

• Sexual Assault Awareness Month in April saw numerous activities on campus centered around the theme of “Hope, Healing, Support, and Unity” led by SARC.

• University ROTC and the University Council on Student Assault hosted the first-ever Stomp Out Sexual Assault 5k Fun Run and Walk on April 15, 2015.

B. Review of 2014 Climate Survey

A second campus climate survey was administered from October to December 2014; 1,776 students ages 18-25 volunteered to report on their knowledge of sexual assault risks and behaviors, understanding of and access to resources, and beliefs and attitudes about reporting and rape myths, as well as experiences with sexual assault, sexual harassment, stalking, and physical violence.

The use of a volunteer sample as opposed to a mandatory sample is necessary when inquiring about difficult experiences and is the standard format used to gather information intended to provide a snapshot of student life. Thus, the current data provides *estimates of* key areas of interest. The intent of gathering this information is to inform campus administration, staff, faculty, and students of the current campus climate in order to understand the possible extent of the problems, concerns, and needs with regard to campus relationship and sexual violence. Data was analyzed and reported to key groups for application of information beginning in 2015. This data provides a second year of statistics to which prevention and intervention efforts can be compared for feedback regarding ongoing educational efforts, resource provision, and performance and programming guidance.

When the data was compiled and analyzed, pertinent results were shared with the UCSA, the campus committee charged by the University President to examine issues regarding campus policies and procedures addressing sexual assault. Membership in the UCSA includes the Title IX Coordinator, SARC Director, Director of Residence Life, Dean of Students, Vice President for Student Affairs, University Police Chief, ROTC representative, and Sexual Assault Prevention Coordinator, as well as faculty, staff, students, and key community partners. Overall, the comparison of 2013-2014 information revealed positive trends in increased knowledge and increased comfort level reporting with no negative backsliding; however, overall changes were very minimal, which would be expected in just one year.

1. Sexual Violence Experiences

   In this sample of University of Montana students, the percentages of students who experienced sexual violence was either consistent with national norms (sexual assault) or was less than national norms (all other areas). In 2013, only 30 participants chose to answer follow-up questions based on having reported sexual violence, and in 2014, only
39 chose to answer follow-up questions specific to sexual violence. Based on these few answers, interpretation should proceed with caution.

Of these respondents across both years, 90 percent of women experiencing sexual violence knew the perpetrator slightly to very well. Just over half the time, (51.7 percent of the time) the use of violence was a threat. Of the 29 women responding, 18 were sure a crime occurred and 11 were unsure. The one male who responded reported that he was sure a crime had not occurred.

In regard to use of alcohol, women reported that the perpetrator was somewhat to very drunk 87.6 percent of the time and the victim was somewhat to very drunk 75 percent of the time. Very few students made any formal report (four to city police, one to residence hall staff, two to faculty or staff), and primarily told a friend (17) or other romantic partner (9). Ten reported negative consequences to reporting that took the form of being blamed or feeling forced to make a formal report. The most common reasons women reported not telling anyone (n=8) was shame or embarrassment, feeling partially responsible, feeling the matter was private, and wanting to forget it happened. Media was also mentioned.

2. Physical Relationship Violence Experiences

Overall, student-reported incidence of physical violence within a relationship, across types of violence, is lower than national norms for dating violence. Men and women in relationships report equivalent use of violence against them. Men reported greater frequencies than women of being scratched, slapped, kicked, bit, and hit with a fist, and having something thrown at them (ranging from 5.5 to 13 percent of men and a maximum of 5.1 percent for women; see below). The survey responses are essentially equivalent for 2013 and 2014.

Men and women both reported being acquainted-to-very-acquainted with their partners a majority of the time (90 percent). However, women (60 percent) were by far more afraid of the actions taken by their partner than men were (20 percent). Women reported physical force more frequently being used. Both men and women reported alcohol involved approximately one-third of the time. Finally, the majority of men and women felt certain that the physical violence that occurred was not a crime. The percentage of individuals in the 2014 survey who said they felt frozen during the incident was lower when compared to those who reported feeling frozen during an incident of sexual violence.

3. Familiarity with Services

The climate survey also revealed that the majority (60 to 70 percent) of men and women know how to access policies on sexual discrimination at the University. It showed that Counseling, SARC and UMPD (police) are perceived quite well and doing well in all domains of comfort and likely access. Students are still not as familiar with the role of the Title IX Coordinator.

4. Barriers to Reporting
Women were 10 times more likely to not see an incident as a crime if they reported they also were drinking during the incident. Thus, drinking by the victim may create an environment in which reporting is less likely. Concerns were raised with being blamed, feeling forced to make a formal report, feeling shame or embarrassment, feeling partially responsible, feeling the matter was private, and wanting to forget it happened. Additional perspectives include: not wanting media attention, and not wanting others to know (family, peers, or community) as well as not trusting the legal system to respond and deliver consequences.

5. Recommendations from the 2014 Climate Survey:

- Efforts continue to be made and should continue to make information on accessing policies and information available. This year this has included updating the University’s web presence and developing materials that will be posted around campus. These materials describe where to access policies and procedures as well as options for reporting, adjudication, and resources available to students. The University should continue to examine new and effective ways to reach students. The possible use of focus groups could be used to gain student ideas.

- Continue to increase education efforts about consent and the role of alcohol in sexual assault.

- The climate survey showed the need to address beliefs men and women have about women lying or “falsely reporting.” “Dynamics of rape” should also be a focus because endorsing the myths on the “he didn’t mean to” scale minimizes responsibility for rape. Educational efforts have been found to be complex because some studies have found that directly addressing these myths fails with educational groups rejecting the messages. Creative approaches to message delivery will be important to further programming. PETSA already provides statistics about false reporting. This should be continued in other training opportunities.

- Reporting is a complicated goal. As evident in the response of victims throughout the survey, and as evidenced in knowledge gained from work with students who are victims while pursuing their education, students may not have a personal interest to report and pursue adjudication. However, we know that being aware of options for reporting, knowing about resources for support, and supporting student wellbeing is paramount. The climate survey proves students know about and are comfortable with the University’s confidential options. SARC efforts and reports to the UCSA suggest that students are utilizing these service options. Reporting can only be improved if students have as much information as possible to make informed decisions because we know official reporting brings with it a complicated set of steps, outcomes, and concerns. Continued opportunities to help the University community know how to access resources and information should be pursued.

- Provide more information about interim measures and avenues to ensure that students are supported in pursuing their education.

- Students need to be more familiar with the Title IX Coordinator. Continue to have the Title IX Coordinator appear in PETSA. Have the Title IX Coordinator participate in orientation. Consider fun ways to keep the Title IX Coordinator in the spotlight.
Continue to use legal definitions in PETSA and highlight definitions of stalking and sexual harassment.

6. Implementation of 2013 Climate Survey Recommendations

In addition to recommendations from the 2014 climate survey discussed above, the following recommendations from the 2013 climate surveys were followed up on over the 2014-2015 school year. The follow-up is highlighted by italics:

- For the 2014 survey administration, posting “Safe Campus Survey” posters in each possible reporting venue is recommended, and when appropriate in these settings, informing students of the opportunity to provide useful information on their experiences through completion of the survey. Safe Campus Survey posters, (including incentives for completing the survey) were hung in reporting venues such as the Title IX Coordinator’s Office and SARC, so students who used services might be more likely to participate.

- Ongoing outreach programs continue to educate on resource options and safety planning specific to risk for physical violence and dating violence more generally. Safety planning has explicitly been discussed with students accessing services and is explicitly outlined in the 2015 UMPD Sexual Assault Investigation Policy.

- Continued coordination between University Police and the Title IX Coordinator to help victims who are students. A shared UMPD/Title IX Compliance Specialist was hired to assist in information sharing and the parties meet weekly to review cases.

- Continue and increase educational materials for faculty and staff about campus and community resources as well as appropriate first-responder responses when they receive reports of relationship and sexual violence from students. “What Employees Need to Know” educational materials are highlighted on the new Title IX website and will be distributed in a handy card format for employees throughout the 2015-2016 year.

- Educate students more explicitly on the definition of stalking. Information on stalking is included in the Discrimination, Harassment, Sexual Misconduct, Stalking, and Retaliation policy, on the Sexual Misconduct Resources website, and in the Sexual Harassment and Sexual Assault Resource Guide.

- More information about reporting sexual harassment for employees. New information is on the website addressing common questions and was sent out to the campus community. The Title IX Coordinator met with numerous student and employee groups, including faculty and teaching assistants, to discuss questions about reporting sexual harassment. The Title IX Coordinator also participated in panels such as one with the Director of SARC, a UMPD Police Officer, and the Campus Assault Prevention Coordinator and spoke to a group of 25 staff members at a table top discussion organized by Staff Senate in April about Title IX reporting procedures.

- Expand efforts to get information to students, especially after the initial student orientation. Expand efforts to ensure that students know where and how to report. Increased first responder training, bystander training, and “Don’t Cancel That Class” reached numerous students after orientation and incorporated information on
first responder education (since friends are most likely to be told first), reporting at UM, and definitions of sexual harassment, etc.

– Students reported preferring web-based access to information. The address of the new Title IX website was emailed to all students, faculty, and staff, in addition to distribution of posters and flyers that provide information to ensure that students know where and how to report.

– Given students’ strong feelings that they should be able to anonymously report to a University official about sexual violence, stalking, discrimination, and intimate partner violence, and the changes in policy based on new federal guidance that require University employees to provide more detailed information to the Title IX Coordinator, the University has increased efforts to educate students on when information may be kept confidential and when it may not by discussing employees as mandated reporters and identifying confidential resources in all new publications and trainings, and through the website.

C. Review of Reports and Responses

Between August 16, 2014 and May 31, 2015, the Office of Equal Opportunity and Affirmative Action/Title IX Coordinator received 63 reports of sexual misconduct, as listed in Table 1.

Table 1: Sexual Misconduct Reports by Incident Type and Clearance

<table>
<thead>
<tr>
<th>REPORT TYPE</th>
<th>TOTALS</th>
<th>COTR</th>
<th>Informal Resolution Process</th>
<th>Investigation Complete: Accused found responsible</th>
<th>Investigation Complete: Accused found not responsible</th>
<th>No Jurisdiction</th>
<th>Unresolved: Investigation Ongoing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sexual Misconduct</td>
<td>2</td>
<td>8</td>
<td>9</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual Harassment</td>
<td>20</td>
<td>3</td>
<td>9</td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stalking</td>
<td>8</td>
<td>3</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual Assault</td>
<td>9</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SIWOC*</td>
<td>10</td>
<td>3</td>
<td></td>
<td>1</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Domestic Violence</td>
<td>7</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dating Violence</td>
<td>6</td>
<td>5</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unclear</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*TOTALS 63 24 13 3 0 17 6

*COTR – Closed with the option to re-open
*SIWOC – Sexual Intercourse Without Consent
The data outlined in this document refers to any case reported to the Title IX Coordinator between August 16, 2014 and May 31, 2015. It does not include any case that was reported prior to that time period that may still be under investigation. The data outlined above and discussed below should be treated as fairly accurate, but is not hard data. During this period of time, the new reporting policy and new tracking policy were being implemented. While the information was maintained in a confidential electronic manner, the narrative format was not conducive to aggregate reporting. Changes are being made to increase the reliability of this system.
Between the period of August 16, 2014, and May 31, 2015, the Title IX Coordinator received seven reports of domestic violence and six reports of dating violence.

Relationship violence is defined in University policy as “abuse or violence between partners or former partners involving one or more of the following elements:

- Battering that causes bodily injury;
- Purposely or knowingly causing reasonable apprehension of bodily injury;
- Emotional abuse creating apprehension of bodily injury or property damage;
- Repeated telephonic, electronic, or other forms of communication -- anonymously or directly -- made with the intent to intimidate, terrify, harass, or threaten.”

Federal Law governing universities breaks relationship violence into two categories: “dating violence” and “domestic violence.” Under those definitions:

“Dating violence,” means violence by a person who has been in a romantic or intimate relationship with the victim. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.

“Domestic violence” includes asserted violent misdemeanor and felony offenses committed by the victim's current or former spouse, current or former cohabitant, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.

In many of these cases, one of the partners involved in the incident was not a student at the University or has left the University. Two (2) investigations are ongoing. In one case a respondent was removed from university housing and suspended. In all cases, access to resources such as SARC, First STEP, Missoula’s Crime Victim Advocate program, and the YWCA were provided to students. Students were offered academic accommodations and safety measures, including the possibility that the respondent be banned from campus. In many cases, Residence Life staff worked closely with the complainant to make sure they maintained access to their housing even if their partner moved out or was required to move out of University housing. In May 2015, individuals involved in Title IX cases on campus received training from the YWCA on dynamics of relationship violence and lethality.

Between the period of August 16, 2014, and May 31, 2015, the Title IX Coordinator received 9 reports of sexual assault. In addition, the Title IX Coordinator received 10 reports of sexual intercourse without consent, which includes acts commonly defined as rape. This makes a total of 19 reports.

Sexual assault is defined in University policy as “an actual or attempted sexual contact with another person without that person’s consent. Sexual assault includes, but is not limited to:

1. Involvement in any sexual contact when the victim is unable to consent.
2. Intentional and unwelcome touching of, or coercing, forcing, or attempting to coerce or force another to touch a person’s intimate parts (defined as genital area, groin, inner thigh, buttocks, or breast).
3. Sexual intercourse without consent, including acts commonly referred to as ‘rape.’ Consent is informed, freely given, and mutual. If coercion, intimidation, threats, or physical force are used there is no consent. If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption, or being asleep or unconscious. There is no consent when there is force, expressed or implied, or use of duress or deception upon the victim. Silence does not necessarily constitute consent. Past consent to sexual activities does not imply ongoing future consent. Whether an individual has taken advantage of a position of influence over an alleged victim may be a factor in determining consent.”

Two (2) complainants chose to go forward with Title IX investigations. These investigations are ongoing. In both cases the reported incident occurred more than a year prior to their report to Title IX. In five (5) of the reported cases, the Title IX Coordinator had no jurisdiction to investigate because these were reports of past sexual violence where the location and respondent were unrelated to campus. In these five cases, the Title IX Coordinator provided resources to the complainants. One (1) report was completely anonymous and it is unknown whether any students were involved. In other cases, the respondent was unknown which limited University action. Two (2) cases were third-party reports by concerned friends or family. In one case the complainant never responded to the Title IX Coordinator. In the other report brought by a third party, the complainant chose not to have an investigation but received resources. In each case, students were given information about advocacy, counseling, and medical resources, and/or were offered academic advocacy and other safety measures such as no contact directives or housing exchanges. Students took advantage of many of these resources. In one (1) case the respondent was expelled from campus.

Between the period of August 16, 2014, and May 31, 2015, the Title IX Coordinator received 20 reports of sexual harassment.

The University defines sexual harassment as: unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, including sexual assault. Sexual harassment, including sexual assault, can involve persons of the same or opposite sex. Consistent with the law, this policy prohibits two types of sexual harassment:

1. Tangible Employment or Educational Action - This type of sexual harassment occurs when the terms or conditions of employment, educational benefits, academic grades or opportunities, living environment or participation in a University activity is conditioned upon, either explicitly or implicitly, submission to or rejection of unwelcome sexual advances or requests for sexual favors, or such submission or rejection is a factor in decisions affecting that individual’s employment, education, living environment, or participation in a University program or activity. Generally, perpetrators will be agents or employees with some authority from the University.

2. Hostile Environment - Sexual harassment may create a hostile environment. A Hostile Environment based on race, color, religion, national origin, creed, service in the uniformed services, veteran status, sex, age, political ideas, marital or family status, pregnancy, physical or mental disability, genetic information, gender identity, gender expression, or sexual orientation exists when harassment:
• is sufficiently serious (i.e., severe, pervasive, or persistent) and objectively offensive so as to deny or limit a person’s ability to participate in or benefit from the University’s programs, services, opportunities, or activities; or
• when such conduct has the purpose or effect of unreasonably interfering with an individual’s employment.

Harassment that creates a hostile environment (“hostile environment harassment”) violates this policy.

A hostile environment can be created by anyone involved in a university program or activity (e.g., administrators, faculty members, students, and even campus guests). Mere offensiveness is not enough to create a hostile environment. Although repeated incidents increase the likelihood that harassment has created a hostile environment, a serious incident, such as a sexual assault, even if isolated, can be sufficient.”

In nine (9) cases of reported sexual harassment, informal resolutions were conducted. For example, in cases where the complainant did not want a formal investigation and wished to remain anonymous, the Title IX Coordinator met with the respondent and discussed the inappropriate behavior, trained the respondent on the policy and through follow-up with the complainant was assured that the conduct had stopped. In other cases, the respondent needed additional support and counseling, so actions were taken by the Behavioral Intervention Team to assist the student in stopping behaviors. In all cases with informal processes, follow-up confirmed behaviors had stopped. Two (2) investigations are ongoing. In one (1) case an investigation found a student responsible for a policy violation. The student did not appeal the finding and discipline is pending.

Between the period of August 16, 2014, and May 31, 2015, eight incidents of stalking were reported.

The University policy defines stalking as “repeatedly following, harassing, threatening, or intimidating another by telephone, mail, electronic communication, social media, or any other action, device or method, that purposely or knowingly causes substantial emotional distress or reasonable fear of bodily injury or death.”

In three (3) of these cases, the respondent was unknown. In at least two of these cases the students worked with UMPD, Title IX, and SARC to create safety plans. In one case, the University’s directive for no contact from the respondent resulted in no additional contact or reported incident.

Between the period of August 16, 2014, and May 31, 2015, two incidents of sexual misconduct were reported.

As counted here, the University policy defines sexual misconduct to include inducing incapacitation for sexual purposes and sexual exploitation. These definitions state:

B. Inducing incapacitation for sexual purposes includes using drugs, alcohol, or other means with the intent to affect or having an actual effect on the ability of an individual to consent or refuse to consent (as “consent” is defined in this policy) to sexual contact.
C. Sexual Exploitation occurs when a person takes non-consensual or abusive sexual advantage of another for anyone’s advantage or benefit other than the person being exploited, and that behavior does not otherwise constitute one of the preceding sexual misconduct offenses. Examples of behavior that could rise to the level of sexual exploitation include:

- Prostituting another person;
- Non-consensual visual (e.g., video, photograph) or audio-recording of sexual activity;
- Non-consensual distribution of photos, other images, or information of an individual’s sexual activity, intimate body parts, or nakedness, with the intent to or having the effect of embarrassing an individual who is the subject of such images or information;
- Going beyond the bounds of consent (such as letting your friends hide in the closet to watch you having consensual sex);
- Engaging in non-consensual voyeurism;
- Knowingly transmitting an STI, such as HIV, to another without disclosing your STI status;
- Exposing one’s genitals in non-consensual circumstances, or inducing another to expose his or her genitals;
- Possessing, distributing, viewing or forcing others to view illegal pornography;

In one case, a formal investigation occurred and the respondent, a student, was found responsible for sexual exploitation. The student did not appeal the finding and discipline is pending. In the other case, there was no jurisdiction to investigate.

**Between the period of August 16, 2014, and May 31, 2015, one “unclear” report was made.**

Unclear reports are those reports that came to the Title IX Coordinator which were initially unclear as to the allegation; initial investigation revealed that they were not Title IX allegations.

D. Additional Evaluation and Analysis of Data Collected

The two biggest factors driving cases to have clearance codes such as “closed with the option to reopen” (COTR) are: (1) Complainant driven: a complainant chooses not to respond to the Title IX Coordinator’s outreach or the complainant seeks help and resources but chooses not to initiate a formal adjudication process and/or wishes to keep his or her identity confidential, and (2) anonymous complaints and those where a respondent was unknown, unnamed, or unrelated to campus. “Found responsible” means there was a preponderance of evidence that a violation of the Discrimination, Harassment, Sexual Misconduct, Stalking, and Retaliation Policy occurred.

Another category—“no jurisdiction”—requires explanation. Several types of cases fall into that category. In 10 “no jurisdiction” cases, the respondent was not a student or in any way related to the University. There was no ongoing discrimination. In these cases “no jurisdiction” meant “no jurisdiction” over the respondent; however, the Title IX Coordinator was able to reach out to the
student complainant and offer resources related to health, safety, academic support, housing, advocacy, counseling, etc. In most of those cases, the respondent was not located in Missoula. Where the respondent was in Missoula, safety planning could be explored, including banning a person from campus in appropriate situations. In three cases labeled “no jurisdiction,” the victim was not affiliated with the University and action targeted at the respondent was pursued under the Student Conduct Code. In the small remainder of the cases, initial investigation revealed that the incident described did not relate to the Discrimination Policy, for example, in cases where the incident was a physical assault unrelated to discrimination, harassment, or sexual or relationship violence.

<table>
<thead>
<tr>
<th>Reporting Party</th>
<th>COTR</th>
<th>Informal Resolution Process</th>
<th>No Jurisdiction</th>
<th>Unresolved: Investigation ongoing</th>
<th>Unresolved: Complete</th>
<th>Accused found responsible</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsible Employee</td>
<td>10</td>
<td>5</td>
<td>9</td>
<td>3</td>
<td></td>
<td></td>
<td>27</td>
</tr>
<tr>
<td>RLO - Responsible Employee</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>RLO - CA/RA</td>
<td>6</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td>12</td>
</tr>
<tr>
<td>UMPD Referral</td>
<td>5</td>
<td>2</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td>12</td>
</tr>
<tr>
<td>Incident Report</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Victim</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Anonymous</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Third Party</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>DOS Referral</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>24</strong></td>
<td><strong>13</strong></td>
<td><strong>17</strong></td>
<td><strong>6</strong></td>
<td><strong>3</strong></td>
<td><strong>1</strong></td>
<td><strong>63</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reporting Party</th>
<th>Sexual misconduct</th>
<th>Sexual harassment</th>
<th>Stalking</th>
<th>Sexual assault (not including SIWOC)</th>
<th>SIWOC</th>
<th>Domestic violence</th>
<th>Dating violence</th>
<th>Unclear</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsible Employee</td>
<td>10</td>
<td>4</td>
<td>5</td>
<td>5</td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
<td>27</td>
</tr>
<tr>
<td>RLO - Responsible Employee</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>RLO - CA/RA</td>
<td>5</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>12</td>
</tr>
<tr>
<td>UMPD Referral</td>
<td>1</td>
<td>4</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>2</td>
<td></td>
<td></td>
<td>12</td>
</tr>
<tr>
<td>Incident Report</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Victim</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Anonymous</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Third Party</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>DOS Referral</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2</strong></td>
<td><strong>20</strong></td>
<td><strong>8</strong></td>
<td><strong>9</strong></td>
<td><strong>10</strong></td>
<td><strong>7</strong></td>
<td><strong>6</strong></td>
<td><strong>1</strong></td>
<td><strong>63</strong></td>
</tr>
</tbody>
</table>
In 79 percent of all cases reported from August 16, 2014 to May 31, 2015, the offender was known to the University. In the 21 percent of cases where the offender was unknown, this most often meant “unknown to the University” because the offender was not a student or the offender’s name was not disclosed by the complainant. Twenty-seven percent of the reports made to the Title IX Coordinator where the offender was known resulted in a satisfactory informal resolution that stopped the identified behavior, sought to prevent its reoccurrence, and addressed the effects on the complainant so they could continue access to their education and feel as safe as possible. A small number of students decided to proceed with a formal adjudication where the offender was known, which led to findings that it was more likely than not that a policy violation occurred (i.e., the accused was found responsible) in six percent of cases. As discussed more specifically above, three types of cases fall into the category “no jurisdiction,” whether the offender was known or unknown: (1) in the majority of “no jurisdiction” cases, the offender was not a student and there was no ongoing discrimination (as an example, “I was raped when I was fifteen”); however, resources were always made available to complainants; (2) the victim was not affiliated with the University so the incident proceeded under the Student Conduct Code; and (3) initial investigation revealed that the incident described did not relate to the Discrimination Policy, for example in cases where the incident was a physical assault unrelated to discrimination, harassment, or sexual or relationship violence.
To help put the data in context, it is useful to examine some of the relevant events that occurred over this reported time period.

**Office of Equal Opportunity and Affirmative Action Staffing Changes**

Since June 2014, there are three new employees in the Equal Opportunity and Affirmative Action Office. In June 2014, the University hired a new, full-time Title IX Coordinator who also serves as the Director of the Office of Equal Opportunity and Affirmative Action. This person reports directly to the President of the University of Montana and sits on the President’s Cabinet, the University Council on Student Assault, the ADA Committee, and the University Cyberbullying Task Force. As discussed previously, the new Title IX Coordinator and her staff meet weekly with a Title IX case review group including the Dean of Students, the Director of Residence Life, the Director of SARC, and the Chief of Police to facilitate communication on Title IX issues.

In January 2015, the Office of Equal Opportunity and UMPD hired a “Compliance Specialist/Data Manager” to review UMPD cases to ensure they are being appropriately referred to the Title IX Coordinator and to follow up and ensure that Title IX resources are offered to survivors. The position is necessary because criminal justice information is protected by Montana State law.

The Compliance Specialist can also track student success to identify if students continue their education. By having access to both student records and criminal justice information, the Compliance Specialist is able to identify patterns of behavior and reoccurring offender names. The Compliance Specialist also assists the Title IX Coordinator in the role of case manager to make sure the intake of all cases is properly filed and tracked, appropriate correspondence is sent, and necessary follow-up is calendared and tracked.
In March 2015, the Equal Opportunity Office hired a full-time Title IX and Civil Rights Investigator. The Title IX Investigator is directly involved in managing, investigating, and following up on cases of harassment and discrimination.

Each of these individuals has received extensive Title IX training and brings vast experience to the positions.

**Residence Life Staffing Changes**

The University of Montana has historically staffed the residence halls with undergraduate student supervisors called the Head Resident and Assistant Head Resident. These positions were placed in residence halls housing 400 to 600 residents, and each hall had a Head Resident and Assistant Head Resident in the building who was responsible for the day-to-day supervision of the Resident Assistants (RAs), the running of the main desk, the conduct of the students, the daily paperwork of room changes, and other administrative tasks. The contracts with both the Head Resident and Assistant Head Resident were for 30 hours a week while they were also full-time students at the University of Montana.

During the fall of 2014, the University hired three full-time Area Coordinators who have Master’s degrees in College Student Personnel or Counseling/Guidance to live and work with the students in the residence halls. The Area Coordinators were placed in one of three areas: Miller/Pantzer/Aber Halls, Craig/Elrod/Duniway Halls, and Jesse/Turner/Knowles Halls. These full-time positions took over the responsibilities of the Head and Assistant Head Resident positions in the running of the residence halls. These positions were part of aligning the residence halls with best practices of the field. In November 2014, the decision to hire a fourth Area Coordinator for University Villages and Lewis & Clark Villages (off campus housing) was made. These professional staff members have received extensive Title IX training and work closely with the Title IX Coordinator, SARC, and the Campus Assault Prevention Coordinator, as mandated reporters and first responders. Data reflects that Area Coordinators often worked closely with the Title IX Coordinator to have follow-up conversations with students to determine if they needed additional interim measures or assistance.

**Residence Life Programming**

The Residential Life professional staff and student staff undergo extensive training on many issues including University policy, Title IX and Bystander Intervention Programming. In addition to the ongoing education, in the fall of 2015, Residence Life will be utilizing the Step Up program in all of the residence hall areas and apartment areas. This program will help residents to identify when to intervene in situations to help their neighbors and the community. The program will be rolled out at the beginning of fall semester 2015 by the Area Coordinators and the student staff.

**Implementation of Maxient Software**

The University of Montana has purchased Maxient software for receiving and managing student conduct cases. The software is used by colleges and universities for receiving incident reports via
the web, tracking and managing behavioral issues, and providing timely analytics. In January 2015 implementation of this software began and, over time, will become one more tool to manage and share confidential Title IX information where applicable between Residence Life, the Dean of Students, UMPD, and the Title IX Coordinator.

**Collaboration on education and interim measures**

The year of data reflects that the Title IX Coordinator increased coordination with SARC, which increased access to resources for students. In addition, a significant amount of information about policies and resources was shared with University employees. Data tracked by the Title IX Coordinator reveals that students consistently and promptly received necessary services and information and that the University took steps to stop and remedy the effects of discrimination. Students were offered safety and interim measures, academic advocacy, and resources such as advocacy and/or counseling and, where appropriate, medical assistance. Together, the Title IX team and SARC provided training across departments and answered first responder questions regarding how to support a survivor. The Title IX Coordinator and the SARC Director also instituted a default advocate policy. This policy ensured that a SARC advocate was present for the Title IX team’s initial meeting with a student. In addition, SARC worked closely with the Title IX Coordinator in assisting students with interim measures.

Data collection revealed that Title IX received the highest number of reports from responsible employees. This suggests that education on mandated reporting has been working and education and training for employees should continue into the future.

The Title IX Coordinator also collaborated closely with Residence Life professional staff, the Dean of Students, academic advisors, and UMPD. Where applicable, information about how to report to the police was given. Together they coordinated to provide necessary information about resources, safety planning, and choices regarding the University process, additional assistance, and follow-up. The University provided significant follow-up through personal phone calls, outreach by professional Residence Life staff, and appointments with academic advisors and the Dean of Students.

Regarding who is accepting interim measures and which interim measures are being used, data shows that it varies considerably. The most used interim measure is some level of academic advocacy. Academic advocacy includes everything from one note to one professor regarding a specific class assignment or date, to comprehensive support for all classes, work with an academic advisor to navigate education planning, and assistance dropping or adding classes to limit the amount of financial aid repercussions for students and decrease barriers to maintaining access to education or returning to school. Review of the reports shows an increased focus on safety planning with collaboration between the Title IX Coordinator, UMPD, and SARC. A significant number of students also turns to SARC for advocacy and counseling. Students are also referred to Counseling Services at Curry Health Center as their staff is specifically trained to work with students who have been victims of (or are perpetrators of) relationship violence, sexual assault, and stalking.
Again, the data suggests that students took seriously the request provided in University outreach, written into the University’s Discrimination Policy, and reiterated by PETSA and other trainings to report behavior even if they were unsure if there was a policy violation. This is supported by the types of complaints received. In many cases, follow-up with complainants showed that safety measures and contacting the respondent to put them on notice of the policy and their behavior had the effect of stopping, preventing, and addressing the effects of the unwanted behaviors that were or would have become sex-based harassment.

Several additional trends about specific respondents and in relation to student groups have been identified. Data collection allowed the Title IX Coordinator to identify that two students were separately engaging in repeated acts of harassment. This recognition allowed the appropriate response to stop the behaviors. With both students, the Title IX team and the Behavioral Intervention Team were involved in order to ensure that appropriate resources were provided to the respondent to enable those students to change their behaviors.

Although there was no specific trend relative to fraternities and sororities, new programming around alcohol and bystander training was implemented this year. All 11 chapters participated in bystander intervention training. They had a facilitation team come to each chapter meeting so 95 percent of the students are trained in the organizations. As a result, several of the chapters will appoint members to volunteer for the UM’s “Make Your Move to End Sexual Violence” program in Fall 2015.

**Recommendations from UCSA 2013-2014 acted upon in 2014-2015**

The UCSA has a long history at the University. During the period of August 16, 2014, to May 31, 2015, the UCSA met as an umbrella group that served as the Coordinated Campus Response to keep student, staff, faculty, the Missoula community, and State of Montana community groups apprised of efforts related to policies, programs, prevention efforts, trainings, and other issues relevant to relationship violence, sexual violence, and Title IX.

UCSA meetings highlighted best practices on relevant issues through discussion of trainings members offered and attended on and off campus and in and out of state. Small working groups met on an ad hoc basis to delve into specific issues. As one example, a media committee partnered with the community Just Response CCR group to analyze how local media reporting of interpersonal violence may affect victim behavior and reporting practices. For example, the release of Jon Krakauer’s book *Missoula: Rape and the Justice System in a College Town* has been reported on in the local *Missoulian* newspaper multiple times per month since at least February 2015. In addition, the working group has created a list of some reported stories during this reporting period and reflected on issues such as word choice and level of detail that could identify victims or their children in this small community. Students responding to the 2013 and 2014 climate surveys confirmed that media can pose a barrier to reporting; one survey respondent wrote, “Anything that happens at the University, especially a rape or assault, would be all over the news before the facts were sorted out...” A barrier would be the “public knowing me for this incident and being marked by it, victim blame is common both by victim and public,” “Montana News/Media blows these situations up.” The team is trying to identify appropriate
next steps to continue education for journalists in regard to sensitivity towards victims of relationship violence, sexual assault, and stalking.

The UCSA confidential case review working group was another group that met confidentially in order to monitor cases, make recommendations for actions and follow-up actions, and analyze trends. This group meets monthly and includes the Title IX Coordinator, UMPD, Residence Life, Dean of Students, Campus Assault Prevention Coordinator, Vice President of Student Affairs, and SARC. Some of the individuals in this group are part of the Behavioral Intervention Team and others are involved in the campus climate survey implementation and analysis. SARC does not reveal any confidential information but is present to provide input on a trauma-informed response. To date, the UCSA case review committee has reviewed every case that was reported through March 2015. Among other things, the group explicitly discussed whether/what action was needed where a complainant did not wish any action to be taken. It also addressed when/if a student needed to be referred to the Behavioral Intervention Team.

More specifically, in 2013-2014, the UCSA made the following observations and recommendations. How the recommendations were followed to date appears in italics:

- Additional educational tools should be created to describe employee-mandated reporting responsibilities and highlight confidential resources. Recommendation: Create a “What To Do When” document for mandated reporters that will be available online. PETSA should be updated to reflect mandated reporting so students are aware that all University employees (other than confidential resources such as SARC) must report disclosures regarding students and sex-based harassment to the Title IX Coordinator. In 2014-2015 the University created a new Title IX website that responds to these questions. These documents also are available in poster, flyer, and postcard formats. PETSA was updated Fall 2014 and will be updated Fall 2015.

- The spreadsheet approved by the United States for tracking complaints of sex-based harassment has been an inadequate tool for record-keeping and analysis. As discussion during case review meetings identified, far more action has been taken, particularly as it relates to additional contacts and follow-up with complainants, than is clearly apparent in the spreadsheet. Both the University and the United States have raised the fact that the existing spreadsheet was not equipped to track such things as: the 24-hour reporting requirements, dates of contacts with both parties, when parties are enrolled as students, which individuals provided follow-up, or when a complainant requested either confidentiality or that no further action be taken yet remedial actions or other actions on behalf of the University still occurred. Recommendation: Create a standard intake form that includes the categories identified as needing improvement. In addition to other categories, the form needs to indicate the result of a preliminary investigation and contact with complainant as this will help identify why a formal investigation and formal finding may or may not have occurred. The new Compliance Specialist/Data Manager position beginning January 2015, and shared between the Equal Opportunity Office and the UMPD, has initiated these changes in record collection. The data spreadsheet now contains multiple drop-down boxes to maintain consistent information and also added additional categories in which to record information.
• While many students felt comfortable disclosing sex-based harassment to University employees such as faculty, staff, and Residence Life employees, and while they did receive assistance, very few students affirmatively chose to file a complaint that would yield a formal University investigation and accountability measures if there were a finding that policy violation had occurred. Recommendation: Title IX Coordinator will continue to train SARC employees about the University investigative process and will work with advocates to create a document identifying the primary questions, fears, and barriers complainants may have. Data from the climate surveys will also be taken into account. The Title IX Coordinator trained and worked with SARC professional employees as well as graduate student interns and undergraduate volunteers to answer questions and discuss collaboration. A new default advocate policy was initiated by which the default is to have SARC advocates present for initial meetings with complainants and the Title IX team. SARC is also called to assist with safety planning and did so in at least three cases in 2014-2015.

• Update PETSA, UM’s online tutorial required of every new student, to include more student voices to share messages about laws, policy, safety, prevention, campus adjudication, and criminal processes. PETSA was updated during the Fall of 2014 and will again be updated for Fall of 2015.

• Encourage student involvement. Students want to be trained by/discuss these issues with other students and not constantly hear the messages from employees or “adult authority figures.” SARC trained 22 peer advocates to conduct bystander trainings in person. In 2015, these advocates led these trainings in the residence halls, at fraternities and sororities, and for athletic teams who had not yet participated in these trainings. In addition, student-led interactive theater relating to these issues occurred in the Fall of 2014 and Spring of 2015.

• Find another way to display posters (i.e., the SARC posters on bathroom mirrors made a real impression on students). In 2014-2015, Make Your Move campaign posters were placed in high-traffic restrooms, and ads ran before films shown in the UC Theater and in community movie theaters across Missoula. The University greatly advanced its web presence with a “SafeUM” button on the bottom right of its home page that linked directly to reporting options and resources. As previously discussed, a new Title IX webpage was developed and introduced to the University community.

• Create a weekly confidential case review with UMPD, Dean of Students, Title IX Coordinator, Director of Residence Life, SARC Director, and possibly the Campus Assault Prevention Coordinator. In 2014-2015, the Title IX case review group has met weekly, in addition to the monthly UCSA case review group. The group discusses current cases and identifies any new action taken or follow-up needed. The SARC Director does not identify any confidential information but is present to assist in making decisions that reflect a trauma-informed focus.

• Increase communication between the Dean of Students and Title IX. The Dean of Students and the Title IX Coordinator talk regularly to identify resources for students, jurisdiction and appropriate policy implementation. They also both participate in the
weekly Title IX case review meeting and the monthly UCSA case review working group, the full UCSA meeting and the cyberbullying task force co-chaired by the Dean of Students.

- The UCSA identified the need for the Title IX Coordinator and UMPD to work more closely on monitoring data to identify patterns and if two reports are the same. It also identified the need for UMPD to have a system to refer dating and relationship violence cases or potential cases to the Title IX Coordinator. UMPD adopted a new Sexual Assault Investigation Protocol that specifies how information is shared with Title IX on sexual assault and other Title IX reportable conduct. UMPD now incorporates Title IX resources in packets they give out to any survivors of sexual or relationship violence and/or stalking. In addition, in January 2015, a new position was created: the UMPD Title IX Compliance Specialist/Data Manager who meets weekly with both the Title IX Coordinator and UMPD Captain. This individual captures data and referrals.

Below are the 2014-2015 recommendations from UCSA:

- PETSA feedback has shown that students want more information about the process in order to become more comfortable reporting to the Title IX Coordinator. Recommendation: Continue to publicize and educate all partners about the new Title IX website that contains this information.

- Further study into different ways of reaching students—Could the University text information to students or provide them with information about helpful mobile phone apps?

- Reach out to underrepresented or vulnerable student populations to make sure information is sent and received in an appropriate way for Native American students, LGBTIQ students, students with disabilities, and other diverse populations.

- Make more connections between bystander trainings, cultural awareness trainings, and Title IX trainings.

- Have the Title IX Coordinator be more visible at Orientation.

- Increased education for academic advisors, as climate survey shows that, after friends, academic advisors are the individuals to whom students most likely will turn for support.

- Continue to provide information about mandated reporting as data shows that most reports to the Title IX Coordinator came from employees.

- Increased education and advertising of current resources will also allow students to make informed decisions about confidentiality, reporting to the Title IX Coordinator, and investigation and adjudication.