



BROWN

**Title IX (Gender Equity, Sexual Assault,  
and Relationship Violence)  
Three-Year Review  
Final Report  
2019**

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## Introduction

The prevention of and response to sexual or gender-based harassment, sexual violence, relationship and interpersonal violence, and stalking remains an area of critical importance to Brown University. In support of this work on campus, the Steering Committee on Equity and Diversity (SCED) was charged with conducting a three-year review of the University's progress in addressing this issue during academic years 2016-2017, 2017-2018, 2018-2019. As such, this review does not take into account the findings from the AAU Sexual Assault Survey, which were released in October 2019. The review consisted of: (1) assessment of trainings (specifically related to reporting, members of the adjudication process, and prevention education), (2) evaluation of the current case management system, and (3) evaluation of the progress of the June 2016 recommendations of the Title IX Oversight and Advisory Board and the original Sexual Assault Task Force recommendations. In addition to the review of previous recommendations, the SCED also developed new recommendations that address these issues in the current University context.

## Background and Charge of SCED

The Sexual Assault Task Force was originally charged in 2013-2014 with developing a comprehensive response to sexual violence and other forms of gender-based harassment occurring on campus. The work of the Task Force concluded with the completion of a report and President Christina H. Paxson's adoption of all recommendations. In the Fall of 2015, the Title IX Oversight and Advisory Board was tasked with conducting a three-year review regarding the University's progress toward implementing the Task Force's recommendations. In 2016, the Title IX Oversight and Advisory Board prepared a report detailing the progress to date and offering additional recommendations to be addressed. In the 2016 report, the Board report highlighted the challenge of responding to discrimination on the basis of gender in isolation, without considering the mutually reinforcing and intersectional nature of power structures and identity. To address this challenge, the Steering Committee on Equity and Diversity<sup>2</sup> was subsequently charged with expanding upon the work of the Title IX Oversight and Advisory Board by reviewing gender equity matters that intersect with other protected classes.

## Scope of the Progress Report

As the Steering Committee on Equity and Diversity conducted this review, it became apparent that past reviews and recommendations focused almost exclusively on the sexual assault and sexual violence components of the Title IX and Gender Equity Office. Title IX addresses broadly gender-based discrimination and harassment, in addition to sexual assault and sexual violence. This report will attempt to bring a broader review to the multiple aspects of Title IX. Further, as it pertains to sexual assault and relationship violence specifically, Brown's institutional commitment and initiatives extend beyond the Title IX and Gender Equity Office

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<sup>2</sup> The Steering Committee on Equity & Diversity is comprised of both the Administrative Equity & Diversity Council (AEDC) and the Student Equity & Diversity Council (SEDC).

and are implemented in partnership with many campus departments. As a result, a broader approach to assessing progress regarding prevention of and response to sexual and relationship violence more accurately reflects the true campus climate and institutional goals. Therefore, the Steering Committee on Equity and Diversity (SCED) renamed this review the Title IX, Sexual Assault, and Relationship Violence Review to more accurately capture the broader scope of activities covered within the Title IX and Gender Equity Office as well as through campus partners. In keeping with this broader scope, the SCED developed additional recommendations that account for all of the departments across campus involved in addressing gender-based discrimination and harassment as well as sexual assault and sexual violence.

## Summary of Three-Year Progress

Significant progress was achieved toward implementing the recommendations originally outlined by the Sexual Assault Task Force and subsequently by the Title IX Oversight and Advisory Board. Key indicators of progress include:

- the establishment of the Title IX and Gender Equity Office in 2016, which is responsible for ensuring the University's compliance with Title IX;
- the implementation and assessment of Title IX trainings for employees, members of the adjudication process, and students to communicate policies, complaint processes, resources and reporting obligations 2016-2018; and
- the launch of a new case management system specifically designed for campus conduct and Title IX cases to streamline communications, track reports, and view comprehensive trends.

A full description of the University's progress is provided in the sections below.

## Assessment of Trainings

### Responsible Employee Training

In academic year 2016-2017, University Human Resources integrated a mandatory onboarding requirement for all faculty and staff to complete a training on sexual violence and gender discrimination. The Title IX and Gender Equity Office facilitated 50 Responsible Employee-Reporting trainings in the 2017-2018 academic year and 41 Responsible Employee-Reporting trainings in the 2018-2019 academic year. One of the purposes of these trainings is to inform responsible employees of their obligations under campus policy and Title IX if they were to receive a disclosure of sexual or gender-based harassment, sexual violence, relationship and interpersonal violence, or stalking. The trainings also highlight various campus support services and reporting options available to potential complainants.

### Members of the Adjudication Process

Members of the adjudication process (e.g., Internal Investigators, Title IX Program Officer, Appeal Officers, Internal Advisers, and the Title IX Council) participate in regular trainings regarding their role in the complaint process. Annually, the Title IX and Gender Equity Office

hosts a Title IX retreat where Internal Advisers, Appeal Officers, Title IX Council members, and Deputy Title IX Coordinators are trained regarding Brown’s Title IX policy and complaint processes, trauma, implicit bias, questioning, and core concepts/definitions. The Title IX Program Officer participates in annual training designed for Title IX Coordinators regarding relevant laws, fundamental fairness, and best practices in investigations. This past year, she also participated in training on transformative justice, implicit bias, and bystander intervention. The Internal Investigator participates in annual training on best practices in equal opportunity investigations.

## Prevention Education

BWell Health Promotion, a primarily, though not exclusively, undergraduate resource situated in the Division of Campus Life, facilitates extensive orientation programming related to interpersonal harm prevention through pre-arrival online education (EverFi), large class meetings, small unit meetings, and outreach at institutional research fairs and panel discussions. The Sexual Assault Peer Educators (SAPE) program, coordinated by BWell, conducts educational programming addressing interpersonal harm covering topics including Positive Change, Sexual Health Awareness, and Masculinity. In the last three years, large numbers of the campus population have participated in the program as evidenced by Table 1.

*Table 1. Educational Intervention and Outreach Participants*

<b>Academic Year</b>	<b>Number of Outreach Activities</b>	<b>Total Number of Participants in Outreach Activities</b>	<b>Number of Educational Interventions</b>	<b>Total Number of Participants in Educational Interventions</b>
<b>2016-2017</b>	6	1,600	111	5,838
<b>2017-2018</b>	23	2,620	222	9,987
<b>Fall 2018</b>	32	2,450	110	8,277

## Evaluation of Current Case Management System

The Title IX Tracker (TNT) records management system developed by CIS was historically combined with multiple systems to track and record referrals made to the Title IX Office and to document cases. TNT pulls basic information from multiple campus systems to enable the Title IX Office to create a virtual case file. However, the system did not provide access to the level of comprehensive information necessary to administer and manage complex Title IX cases and to track themes. As a result, the Office of Institutional Equity and Diversity purchased Maxient<sup>3</sup>, a records management system specifically designed for campus conduct and Title IX cases, which allows for streamlined communication and comprehensive trend analysis. The Title IX and Gender Equity Office transitioned to Maxient during the Summer of 2019 and will be uploading historical case data into the new system.

<sup>3</sup> The Maxient system is currently also utilized by the Bias Review Team and the Office of Student Conduct and Community Standards.

## Status of the June 2016 recommendations of the Title IX Oversight and Advisory Board

In June 2016, the Title IX Oversight and Advisory Board released a report detailing the progress of the recommendations made by the University's Sexual Assault Task Force. In this report, the Board also issued a number of new recommendations, with some overlapping with past recommendations. The Steering Committee for Equity and Diversity has consolidated all recommendations based on topic areas below to provide greater clarity on the status<sup>4</sup> of the initiatives suggested by the Sexual Assault Task Force and the Title IX Oversight Board. While the information in this section is general and intended to keep the community apprised of overall progress, a more detailed explanation of the work toward each initiative can be found in Appendix A at the end of this document.

### Title IX Training and Outreach

The University continues to expand upon the extensive Title IX training offered through campus pertaining to campus policies, complaint processes, resources, and reporting options specific to the population participating in the training. The Medical School has fully integrated comprehensive Title IX training and all graduate students participate in a standardized curriculum. All incoming undergraduate students and new employees complete an online educational program. The Title IX and Gender Equity Office also hosted extensive in-person training opportunities for faculty and staff based upon the unique attributes of their particular role or unit.

### Prevention Education and Outreach

Past recommendations to enhance prevention education focused on providing additional training opportunities for specific groups (e.g., student-athletes and program houses) where national data has indicated that increased support may be beneficial. BWell and the Title IX and Gender Equity Office continue to offer training tailored to specific groups and have incorporated concepts of intersectionality, identity, power, privilege and oppression into existing offerings. A previous recommendation also encouraged the University to provide in-person prevention education opportunities for employees, including utilizing a bystander intervention training model. To this end, a bystander training program will be available for faculty in the 2019-2020 year and will be assessed in the next review.

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<sup>4</sup> The following departments were contacted regarding their role in implementing these initiatives and their perception of the current resources. Student Conduct, Student Support Services, Office of the Ombudsperson, CAPS, Health Services, BWell Health Promotion, Brown EMS, Student and Employee Accessibility Services, Dean of the College, Chaplain's Office, Office of the General Counsel, Brown Center for Students of Color, Residence Life, Graduate School, Medical School, Athletics, Department of Public Safety, Title IX and Gender Equity Office, Sarah Doyle Women's Center, and the LGBTQ Center. Many units provided feedback that exceeded the scope of these initiatives but is useful more broadly in understanding the complexities faced by various departments. The Office of Institutional Equity and Diversity will utilize this information to inform continued efforts.

## Role Designations: Responsible Employees and Advisers

The knowledge of responsible employees with respect to their role in responding to disclosures was highlighted in past reports as an area for potential improvement. Although employees participate in extensive training, reporting obligations are complex and disclosures are infrequent, limiting the opportunity to put training into practice. Employees are also keenly aware of the potential impact of their response on the reporting party and are seeking guidance on both procedural responsibilities and providing sensitive and supportive responses. Over the past three years, students designated as responsible employees (e.g., Residential Peer Leaders, Meiklejohn Peer Advisors, and Teaching Assistants) have participated in training programs related to their role. The Title IX and Gender Equity Office is also currently partnering with the Office of University Communications to develop additional training materials and easy to navigate guides to enhance understanding of campus procedures.

## Assessment

Review of progress toward assessment initiatives indicates that this is an area to dedicate additional focus moving forward. The University administered the AAU 2019 Campus Climate Survey on Sexual Assault and Sexual Misconduct in the Spring of 2019 and released the results in the Fall 2019 semester. However, recommendations regarding the creation of an anonymous online method for providing feedback on the Title IX website and incorporating Title IX related questions in the end-of-year survey for student-athletes have not been completed at this time.

## Process/Policies

The University implemented both a unified procedure for resolving Title IX complaints and a training program for individuals involved in the complaint adjudication process as members of the Title IX Council. Although the policies, procedures, and resources are widely disseminated and readily available, some community members are uncertain of the process due to its complexity. As mentioned above, the Title IX and Gender Equity Office continues to prioritize the development of training materials and infographics to promote a full understanding of the complaint adjudication process and other available resources.

## Increased Support Resources Tailored to Specific Communities

Previous recommendations have highlighted a need for increased support services based upon the unique needs of specific communities, including graduate students, medical students, postdoctoral fellows, student-athletes, and identity centers. The University placed a designated CAPS therapist in the Medical School and CAPS increased outreach to graduate students. The recommendation to house confidential resources in identity centers is no longer being pursued for reasons detailed in Appendix A (27), however, such resources remain available to all students through Health Services, CAPS, Sexual Harassment & Assault Resources & Education (SHARE), and the Office of the Chaplains and Religious Life. At this time, prevention educators have not been dedicated to graduate and medical students exclusively.

## Recommendations

As a result of this review, the Steering Committee on Equity and Diversity has determined that it is critical for there to be greater alignment between the Title IX and Gender Equity Office, the Department of Public Safety (DPS), SHARE (Sexual Harassment & Assault Resources & Education) Advocates in BWell Health Promotion, and Health Services in general as it relates to a holistic campus-wide response to the issue of sexual and gender-based harassment, sexual violence, relationship and interpersonal violence, and stalking. These departments provide overlapping and complementary components of the University's prevention of and response to sexual violence including student advocacy and support, safety considerations, prevention education, and access to criminal and campus-based accountability systems. Despite extensive training, campus community members commonly report that they are unaware of what their designation is or are unclear about the implications of these designations. As a result, policies, protocols, or directives that are aligned across departments could lead to ineffective responses during a traumatic time for the reporting party. To address this issue, the Office of General Council began providing in-person CSA training in August 2019 and will continue this effort across the University, which is also provided as on-line module.

In addition to the continued pursuit of remaining past recommendations, the Committee recommends the following:

1. Collaboration between the Title IX and Gender Equity Office, Department of Public Safety, and Health Services (including representatives from SHARE, Brown EMS, BWell Health Promotion, and CAPS) should be institutionalized through a formal mechanism to facilitate information sharing in accordance with applicable privacy laws and University policies, consistent messaging and response, and the provision of comprehensive training to the campus community. Feedback from these departments demonstrates strong collaboration and support among and between departments when responding to a particular incident but challenges persist as each unit approaches a scenario from a different (and sometimes competing) lens or protocol based on the best practices and regulations related to their particular field. Frequently changing protocols were also cited as a point of confusion. Increased opportunities to regularly discuss process improvements would therefore be beneficial.
2. The University has achieved significant progress in increasing educational programming, resources, strengthening of policies and procedures, and efficiency and equity in the adjudication process. While sweeping changes are not required, refinement of this work should be informed by a nuanced understanding of our successes and areas where improvement is necessary in order to fully serve and support our community. The Committee therefore recommends that resources be allocated to focus on completion of the assessment recommendations in section IV(d) and comprehensive review of the AAU

survey to inform ongoing improvement. A student-led study<sup>5</sup> of 100 Brown University undergraduate students concluded that although students had knowledge of campus resources, female-identified and older students had less trust in the institution than their peers. This committee recommends that a focus group conduct assessment on institutional trust and confidence and the basis for such perceptions to identify spaces for trust-building.

3. With robust resources for student complainants, support resources for other populations (student respondents, faculty and staff experiencing domestic violence or stalking, for example) may be overshadowed. Existing services should be clearly articulated and marketed with an expansion of resources as appropriate.
4. Feedback from multiple offices revealed a theme regarding student leaders and their hesitancy or discomfort related to their role as responsible employees in the context of disclosures of others as student group leaders who observe or are made aware of harm within their group. This Committee recommends that additional focus be placed on educating student leaders in sensitive, effective, and Title IX-compliant responses to such circumstances as they arise.
5. Due to employees reporting that they are unsure of their responsible employee designation status, the Committee recommends that the policy definition of responsible employee and associated designations be revisited and clarified for all existing employees and that new employees be clearly notified of their designation. These designations will be reviewed when the new Title IX regulations are issued by the U.S. Department of Education.
6. Departmental feedback underscored a need for additional employee training and development where gender-based issues are creating climate concerns in specific academic or administrative departments but do not rise to the level of a violation of the Title IX policy. The committee therefore recommends that the Office of Institutional Equity and Diversity and University Human Resources consider opportunities for employees and supervisors to develop capacities to respond to disagreements or disruptions within their unit that do not rise to the level of formal University intervention.
7. Challenges exist in terms of the complexities of providing training for Medical School faculty who are not employed by the University and hold a diverse range of roles across various locations. Training models should be explored that would promote consistency across all Brown-affiliated faculty at all locations where Brown students and staff interact.

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<sup>5</sup> Shembo (2019). Student perceptions of on-campus sexual assault and prevention response resources.

8. To ensure consistency between external and internal investigations conducted pursuant to institutional policies, the Office of Institutional Equity and Diversity and the Office of the General Counsel should develop a procedure by which external investigators are vetted prior to hire and periodically reevaluated.

## Conclusion and Next Steps

The evaluation of departmental feedback and progress toward previously recommended initiatives in the last three years demonstrated a tremendous increase in resources, collaboration, and responsiveness by the Title IX and Gender Equity Office, SHARE, the Department of Public Safety, Administrators on Call and CAPS. This work resulted in a strong foundation of policy, resources, and community awareness regarding Title IX, sexual assault, and relationship violence. Informed by increased assessment, future initiatives based on the recommendations outlined above will aim to further refine existing processes and services and improve awareness of these resources throughout the campus community. These recommendations, as well as the Title IX Regulation from the U.S. Department of Education, will be reviewed by the Vice President for Institutional Equity and Diversity in consultation with President Paxson and the appropriate senior leadership for implementation at Brown University.

## Appendix A

### Detailed Status of the June 2016 recommendations of the Title IX Oversight and Advisory Board

The table below provides an update for each recommendation. For purposes of this chart, “ongoing” refers to an initiative that is cyclical or continuing while “in progress” pertains to items that are partially implemented.

<i>Title IX Training and Outreach</i>		
<b>Recommendation</b>	<b>Progress</b>	<b>Update</b>
1. Greater coordination between offices and centers on campus that oversee various trainings related to Title IX.	Ongoing	<p>The Committee discussed the need to provide specific actionable goals around this recommendation to quantify whether objectives were attained. This is addressed above in the recommendations portion of this document.</p> <p>The Title IX Program Officer meets monthly with SHARE and BWell, is an ad hoc member of the Graduate Students of Concern meeting, and participates in weekly threat assessment team meetings (this team includes colleagues from CAPS, Health Services, Department of Public Safety, Student Support Services, Dean of the College, Student and Employee Accessibility Services and Residential Life). The Title IX Program Officer also consults regularly with the Director of Student Conduct and Community Standards to discuss case management and student support related to ongoing cases.</p> <p>The Brown Center for Students of Color has a close working relationship with the Title IX Program Officer, SHARE advocates, and Counselor-Psychologists. Student Support Services works closely with the Title IX Program Officer, SHARE Advocates, and others that enable it to revisit protocols as needed. Last year, this department adjusted its administrator on call protocols to better connect students to crisis resources after hours. The Deputy Title IX Coordinators situated in the Graduate School, the Medical School, the Dean of Faculty Office, and Campus Life also facilitate access to resources unique to the needs of their populations and serve as liaisons to the Title IX Program Officer.</p>
2. Training at medical school onboarding activities (e.g., orientation, beginning year activities, etc.).	Implemented	<p>The Medical School has fully integrated comprehensive training on Title IX, reporting, confidentiality, and campus policies on an annual basis for incoming students. This is incorporated through various student touchpoints including Gateway Orientation in July, First Year Orientation on the Learning Environment in August, Community Resource Fair/White Coats try-on event in August, and the Rising Second Year training on the Learning Environment in September.</p>

3. Training at School of Public Health onboarding activities (e.g., orientation, beginning year activities, etc.).	In Progress	This initiative was partially implemented. All students enrolled in the School of Public Health were offered training but as of this upcoming academic year it will be closer in time to orientation. In addition, SPH faculty and staff were offered extensive training. The Assistant Vice President for the Office of Institutional Equity & Diversity in partnership with the University Ombudsperson conducted training sessions for SPH faculty and administrators related to policy definitions, responsible employee reporting, responding to disclosures, climate concerns, and bystander intervention.
4. Mandatory online training for faculty, staff, undergraduates, medical students, graduate students.	Ongoing	BWell Health Promotion partnered with EverFi to deliver online education pre-arrival to all incoming students. The course is required and engages students as they progress, fostering healthy relationships and preparing them to recognize and respond to sexual assault and harassment if it occurs. All new employees complete the Workplace Answers online training.
5. Standardized graduate student training curriculum.	Implemented	Graduate students currently participate in a module and test hosted by the Canvas platform. In August 2019, the University shifted to the EverFi graduate student online training program.
6. Workplace Answers training should be re-evaluated and strengthened to better suit the Brown community.	In Progress	All new employees currently participate in the Workplace Answers online training program in association with their onboarding. The Title IX and Gender Equity Office is currently evaluating what may be an appropriate booster program for employees who have previously completed the original online training but would benefit from complementary sessions over time. In addition, the EverFi module Bridges is being considered as a replacement to the Workplace Answers module.
7. Development of mandatory module for doctoring course and introduction to clerkships course at medical school.	In Progress	The Title IX Program Officer presented to all incoming doctoral students and was also a panelist and a small group session leader in the Spring 2019 session on intersectionality.
8. Provide in-person training opportunities for faculty and staff.	Ongoing	The Title IX and Gender Equity Office is currently developing a general responsible employee session that will be offered in person on a recurring and regular basis. Employees may register for this program at their discretion. Tailored in-person sessions based upon unique departmental needs have been presented to faculty and/or staff in various campus units including the School of Public Health (2018, 2019), American Studies (2018), History (2019), the Trinity Repertory Company (2018), Chemistry (2018) and Computer Science. Department-specific sessions were also conducted in the Library (2018, 2019), Global Brown (2019), the Graduate School (2017), the Sheridan Center (2017), Advancement (2018), the Swearer Center (2017, 2018), the Dean of the College Division (2018), and for Medical school staff (2018).

*Prevention Education and Outreach*

<b>Recommendations</b>	<b>Progress</b>	<b>Notes</b>
<p>9. Training tailored toward specific groups, based on data, where there may be elevated needs for prevention (e.g., athletes, postdoctoral fellows, etc.).</p>	<p>Ongoing</p>	<p>Professional staff in BWell, including the SHARE Advocates, create, implement and evaluate educational intervention programming to address both interpersonal harm prevention and response as well as overseeing the peer education efforts to do the same. In response to previous Task Force recommendations, programming for specific populations was provided as follows: (AY 2016-2017) 23% of programs were exclusive to Greek and program houses, 2% of programs were exclusive to student-athletes; (AY 2017-2018) 9% of programs were exclusive to Greek and program houses, 5% of programs were exclusive to student-athletes; (Fall 2018) 5% of programs were exclusive to Greek and program houses.</p> <p>The Title IX Program Officer conducted educational workshops with the Third World Transition Program (2017), the Graduate Students of Color Community (2017), and Sexual Assault Peer Health Educators (SAPE) (2018), in addition to meeting annually with Women Peer Counselors in Residential Life (2017-2019) and the student staff within the Sarah Doyle Women’s Center (2018).</p>
<p>10. Trainings should address the intersectional nature of violence, power, privilege, and oppression.</p>	<p>Implemented</p>	<p>The Division of Campus Life houses multiple student centers and health and wellness services that focus on different aspects of identity. These centers help to address issues of power, privilege and oppression. SHARE utilizes a social justice, peer advocate model that recognizes identity, power, privilege, and oppression in its workshop modules. The events and programs of the Brown Center for Students of Color often address topics related to centering healing, well-being, understanding consent, and addressing harm/violence. Trainings conducted by the Title IX and Gender Equity Office incorporate examples demonstrating how inequity may surface, including social norms as a root cause of such inequities. Staff from the LGBTQ Center have been involved with ensuring that campus-based policies and programming relative to Title IX are LGBTQ inclusive.</p>

11. Provide in person prevention and bystander training opportunities for faculty and staff.	In Progress	BWell is primarily responsible for overseeing prevention education, however, due to its positionality in Campus Life its charge focuses on student programming. Given its existing overcapacity in responding to student training needs, there is a gap in terms of prevention education opportunities for faculty and staff. Associate Professor Meredith Hasting from the Department of Earth, Environmental, and Planetary Sciences is currently in the third year of a National Science Foundation grant through which she is developing modules and train the trainer programming on bystander intervention targeted at faculty. It is anticipated that her programming will be rolled out on campus during AY19-20 or AY20-21. The University Ombudsperson conducts select sessions of bystander intervention training and further incorporates these concepts into broader training on conflict resolution.
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*Role Designations: Responsible Employees and Advisers*

<b>Recommendation</b>	<b>Progress</b>	<b>Update</b>
12. Grow adviser list and compensate those serving in this capacity.	Incomplete	While there is general support to expand the pool of trained internal advisers that are available to complainants and respondents, it remains to be accomplished. There is no requirement that the adviser be chosen from this pool or be an individual from the Brown community. At this time, a budget allocation has not been made to compensate advisers and they currently serve in this capacity on a voluntary basis. In AY 2016-2017, there were 14 advisers (2 of which were utilized in Title IX process), AY 2017-2018, there were 14 advisers (none are known to be utilized in Title IX process), and in AY 2018-2019, there were 6 advisers (2 were utilized in Title IX process).
13. Consider alternate title for responsible employees.	Incomplete	The responsible employee designation, which is based upon federal guidance related to Title IX, is given to individuals required to report disclosures to the Title IX Program Officer. Some community members who are seeking resources have indicated that the term "responsible employee" is confusing or has a negative connotation and may therefore create a barrier to accessing campus-based services. Revisiting the title of this designation requires discussion with and advice of the Office of the General Counsel. In addition, the much-anticipated Department of Education Title IX Regulations have not, as of this date, been published and which may have a different designation or obligation.

14. Provide additional training for students designated as responsible employees (RPLs, Meiklejohn Fellows, TAs, etc.)	Ongoing	Meiklejohn and RPL groups received in-person training related to their role during 2017-2019, while TAs were required to complete an online training module. In addition, the Title IX Program Officer meets annually with student managers in Brown University Dining Services, student governance groups (Undergraduate Council of Students, Graduate Student Council, Medical Student Senate), and student activist groups NARAL and ACLU. Some feedback indicated that students who are designated as responsible employees are not entirely comfortable acting in this capacity and do not perceive themselves as being fully equipped to handle a sensitive disclosure of this nature based on their lack of professional experience.
15. Clarify necessary reporting obligations of responsible employees, what making such a report entails, how to respond in a sensitive manner to a disclosure, and responsible employee designations.	In Progress	This recommendation was partially addressed through incorporation into existing responsible employee training, which provides techniques regarding what to say in the moment upon receipt of a disclosure, appropriate talking points, remaining cognizant of personal bias and triggers, sensitivity regarding questioning the party, and detailed reporting processes. However, departments continue to indicate that confusion persists among faculty, staff, and student-employees regarding whether they are designated as a responsible employee.
16. Creation of simple "how-to" guide for responsible employees or faculty responding to disclosures that guides them toward the correct offices/resources as well as the most sensitive and responsive actions that support those providing reports while making clear limits of confidentiality.	In Progress	The Title IX and Gender Equity Office is currently working with the Office of University Communications to develop several handouts and publications intended for wide distribution throughout the campus including the aforementioned "how-to" guide, a reporting flow chart, and documents depicting campus resources and services.

*Assessment*

<b>Recommendation</b>	<b>Progress</b>	<b>Update</b>
17. Anonymous online feedback mechanism on Title IX site.	Incomplete	There is no current available and anonymous Title IX-specific online feedback mechanism.
19. Increased transparency in data collection methods.	In Progress	As the intended outcome behind this recommendation is unclear, future work should explore what transparency would look like in this context. The University launched the 2019 Campus Climate Survey on Sexual Assault and Sexual Misconduct, sponsored by the Association of American Universities (AAU) in the Spring 2019 semester. This survey provides insight into students' perceptions of campus climate pertaining to sexual assault and sexual misconduct and will be available for review in the Fall 2019 semester.

<i>Process/Policies</i>		
<b>Recommendation</b>	<b>Progress</b>	<b>Updates</b>
20. Wider distribution of Title IX resources and policies beyond mass emails.	In Progress	The Title IX and Gender Equity Office is currently engaged with the Office of University Communications and the Office of the General Counsel to develop materials related to campus-based resources and reflective of existing Title IX policies to be distributed in printed format and via Today@Brown scheduled announcements.
21. Available and transparent information about policies, processes, resources, and remedial measures.	In Progress	All policies, procedures, resources and remedial measures related to the University's response to sexual and relationship violence are readily available on the Brown website. A potential weakness identified through departmental feedback is that current flowcharts and publications intended to simplify the process are confusing and that the spectrum of possible sanctions for a Respondent remains unclear.
22. Implement a unified University process for resolving Title IX complaints.	Implemented	All Title IX complaints are now adjudicated using a unified complaint resolution process.
23. Unified training for those involved in grievance (complaint adjudication) process.	Ongoing	The Title IX and Gender Equity Office provides training for individuals serving on the Title IX Council and to Deans within the Office of Student Conduct and Community Standards. The Title IX Council training is modified each year to address specific educational needs that are illuminated through the course of case processing.

<p>24. Re-evaluate protocol that requires DPS to respond to all EMS dispatches.</p>	<p>Incomplete</p>	<p>This protocol remains in place. As a state-licensed ambulance service, Brown EMS responds to all calls for medical assistance on the Brown campus. When a call is related to sexual violence, EMS provides appropriate care for injuries and serves as the link between patient and campus resources. EMS utilizes written guidelines for transport destinations and notifies those who need to know of the incident within the medical continuum. EMS is currently working to establish a "Code Teal" assessment tool to ensure that all prehospital providers are approaching sexual violence patients with the same understanding of the role of EMS. For campus events staffed by non-ambulance foot patrol EMTs, a "Code Teal" notification procedure is employed so EMTs may coordinate the appropriate patient resources. A current barrier in services is the lack of a clear transport destination for all patients dependent on age, gender, and level of intoxication.</p> <p>DPS receives and investigates complaints of sexual violence reported to them. In addition, they provide support services for the victims of sensitive crimes to include hate crimes, sexual assault, assaults, robberies, relationship violence, and stalking. The department utilizes a law enforcement advocate who works cooperatively with the DPS Detectives, Office of Student Life, CAPS, and Human Resources to ensure individuals are knowledgeable about their options for personal and workplace safety planning. DPS employs a specialized Detective who engages victims in an effort to facilitate reporting and any necessary communications involving sensitive crimes with other municipal agencies, to include the Providence Police Department. DPS provides further support in enforcing No Contact Orders issued by the Office of Student Conduct and Community Standards and restraining orders issued by other law enforcement agencies.</p>
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*Increased Support Resources Tailored to Specific Communities*

<b>Recommendation</b>	<b>Progress</b>	<b>Update</b>
<p>25. Establish a list of local attorneys willing to represent, pro bono, complainants and/or respondents unable to afford legal counsel.</p>	<p>Incomplete</p>	<p>A list of local attorneys is not currently maintained. However, when a complainant or respondent requests pro bono or reduced fee legal services, the Office of the General Counsel contacts local attorneys to see if they are available to represent the student and, if so, provides the student with the names of attorneys willing to provide legal representation pro bono or for a reduced fee.</p>

<p>26. Staff in Health Promotion dedicated to graduate and medical student curriculum.</p>	<p>Incomplete</p>	<p>Additional resources have not yet been provided to support this recommendation. BWell reports they are currently operating beyond capacity and without increased staffing, the need for additional support and advocacy and extended reach to graduate and medical students cannot be achieved. The percentage of graduate and medical school students reached through educational interventions is likely to remain stagnant at around 5% without additional staffing.</p>
<p>27. Increased confidential resources in identity centers and dedicated to graduate and medical students.</p>	<p>In Progress</p>	<p>The LGBTQ Center explored the possibility of having an in-house confidential resource for students who may feel more comfortable discussing a concern with a known and trusted individual. However, concerns arose that a confidential resource would be potentially viewed as a licensed clinician by students, regardless of the staff member's background, so someone serving in that capacity would therefore need to hold a license to provide such care. This requirement to hold a license is not otherwise necessary for Center employees and would severely limit the ability to recruit such an individual. As resources were not allocated to hire someone for this role alone, an existing LGBTQ Center staff member would need to be assigned to this role. The current employees do not hold this credential. This recommendation is therefore no longer being pursued.</p> <p>The Graduate School reports that CAPS has taken steps to increase its outreach to the graduate student population. The Medical School currently houses a CAPS therapist specific for medical students, which removes previous barriers to accessing care. The Office of the Chaplains and Religious Life is also a confidential resource for students and is typically utilized after an incident to navigate healing and moving forward.</p>
<p>28. Provide additional resources related to gender equity in athletics.</p>	<p>Implemented</p>	<p>Beginning in the Fall of 2017, the Associate Director of Athletics for Compliance collaborated with the Title IX Program Officer to plan and implement educational sessions dedicated to student-athletes and athletics staff. The Title IX Program Officer also attends the annual compliance meeting at the beginning of each year to provide an introduction between student-athletes and the Title IX and Gender Equity Office. Brown University Athletics, the Office of Institutional Equity &amp; Diversity, and the Office of the General Counsel have prepared Title IX training, along with bystander intervention, anti-hazing and social media training specifically tailored for coaches, athletic training staff, student-athletes, and sports supervisors to be implemented in the upcoming academic year.</p>