Lessons Learned from Conducting Sexual Misconduct Investigations During a Pandemic

ANN TODD
CATHY COCKS
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Today's webinar is being conducted by the National Association of Clery Compliance Officers and Professionals (NACCOP).

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Some people will do their interview in the bathroom.

Fix your face.

We have issues too.
Resource management wins.

COVID-19 Safety

Scheduling Flexibility

Individual Safety

Cost

Embrace the technology.

Waiting Rooms

Chat Function

Breakout Rooms

Whiteboards

Break the virtual wall.

Cameras On

Rapport

Line of Sight

Communication Cues
Get creative with evidence collection and sharing.

Helpful Meeting Notice Language

- Please be in a location with good Wi-Fi and have your camera on.
- For confidentiality purposes, please find a private location. Be sure no other persons, except for your advisor, are in the room (on or off camera) during the interview.
- As it can take a few minutes to log in, please begin the login process 10 minutes before the start time.
- If you are unable to secure a private location or you have Wi-Fi issues, please contact Dr. Roe’s office and they will assist you in looking for an alternative space for the zoom interview.
- You will join a waiting room - please be patient - the investigators will join you into the meeting when the previous interview has finished.
- If you have evidence to share, please send it in advance of the interview to droe@college.edu.
Upcoming D. Stafford Classes

- Title IX Coordinator
  - February 22 - 26, 2021
  - May 3 - 7, 2021
  - October 4 - 8, 2021

- Combined Sexual Misconduct and Domestic/Dating Violence and Stalking Investigation
  - April 12 - 16, 2021
  - August 23 - 27, 2021

- Advanced Investigations
  - March 8 - 12, 2021
  - June 7 - 11, 2021
  - November 8 - 12, 2021

For more information: dstaffordandassociates.com
Intersection of Title IX and Threat Assessment Teams

CATHY COCKS
BETH DEVONSHIRE
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Agenda

- Title IX Regulations
- Figuring Out the Process

What the Title IX regulations say...

- “(c) Emergency removal. Nothing in this part precludes a recipient from removing a respondent from the recipient’s education program or activity on an emergency basis, provided that the recipient undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. This provision may not be construed to modify any rights under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, or the Americans with Disabilities Act.”

Criteria

- Rising from the allegations
- Immediate threat to physical health and safety
**Immediate vs. Imminent**

<table>
<thead>
<tr>
<th>Immediate</th>
<th>Poses a threat of instant harm or attack</th>
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<tbody>
<tr>
<td>Imminent</td>
<td>Poses a threat of impending or looming harm or attack</td>
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</table>

**Risk vs. Threat**

| Risk       | Effect of an occurrence on objectives  
Focuses on particular incidents and the effects  
Risk Assessment - Potential event that may occur and its effect |
|------------|----------------------------------------|
| Threat     | An intention to cause harm  
Focuses on the person's intentions and the harm those intentions may cause  
Threat Assessment - A person of concern's intentions and their ability to carry out the intentions |

**When do we do it?**

- Dating Violence/ Domestic Violence?
- Stalking?
- Sexual Assault?
- Sexual Harassment?
Who conducts the analysis?

- Title IX Coordinator
- Police
- Threat Assessment Team
- Human Resources/Student Affairs

REMEMBER!

- One person
- One role

Immediate

- Motives and goals
- Communications
- Attack-related behaviors
- Capacity
- Other people are concerned
- Sees violence as acceptable
- Pathway to violence

Imminent

- Experiencing hopelessness, desperation, and/or despair
- Trusting relationship
- Consistency
- Inappropriate interest
- Additional circumstances
Who decides and notifies?

Title IX Coordinator

Who else?

Human Resources/Student Affairs

Threat Assessment Team Chair

Who hears the challenge?
Thanks to our sponsor!

D. Stafford & Associates

For more information: dstaffordandassociates.com

Upcoming D. Stafford Virtual Classes

- Title IX Coordinator (11:00 AM - 5:00 PM Eastern)
  - February 22 - 26, 2021
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  - March 8 - 12, 2021
  - June 7 - 11, 2021
  - November 8 - 12, 2021

2021 NACCOP Title IX Webinar - Where We Are, Where We Are Going - An Overview of the Biden Administration’s Higher Education Plan

- This session will cover compliance related topics that are currently being discussed by the Biden administration, including Title IX, intersectional issues between Title IX and the Clery Act, institutional funding, student loan forgiveness, and other compliance-related issues.

- Thursday, April 29, 2021 from 2:00 PM - 3:30 PM (Eastern Time)

- Individual Cost: $49.00 (Member) $99.00 (Non-Member)

- Group Rate: $129.00 (NACCOP Member) $249.00 (Non-Member)

Visit www.naccop.org and select the “Trainings & Webinars” tab

2021 NACCOP Title IX Webinar - Student and Employee Conduct Policies in 2021 and Beyond: Updating for Compliance and the Times

- NACCOP is offering a comprehensive webinar presented by experts with practical experience analyzing and updating student conduct and employee policies and procedures to ensure Title IX and Clery Act compliance, fair and equitable processes, and the ability to manage an evolving higher education landscape.

- Tuesday, May 13, 2021 from 2:00 PM - 3:30 PM (Eastern Time)

- Individual Cost: $49.00 (Member) $99.00 (Non-Member)

- Group Rate: $129.00 (NACCOP Member) $249.00 (Non-Member)

Visit www.naccop.org and select the “Trainings & Webinars” tab
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Agenda

- Regulations Review
- Appeal Realities
- Appeal Scenarios

REGULATIONS REVIEW

Two Appeal Opportunities

- Determination regarding responsibility
- Dismissal of a formal complainant or any allegations
Required Bases for Appeal

- Procedural irregularity that affected the outcome of the matter
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter
- Conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter

“As to all appeals, the recipient must…”

- Notify other party in writing
- Appeal decision-maker has no other role
- No conflict of interest of bias

“As to all appeals, the recipient must…”

- Both parties have an opportunity to submit a written statement
- Issue a written decision describing result and rationale
- Issue simultaneously
Policy Decisions

Steps:
- Automatic appeals
- Deadlines

Who hears the appeal?
- One person
- Panel
- Senior staff (VP)
- External
Pitfalls

Bias and conflict of interest

Broader concerns

Timeliness

Results

Back to investigator

New hearing

Appeal officer decides

Back to original decision-maker

APPEAL SCENARIOS
Case Study: The Order

The respondent has filed an appeal claiming a procedural irregularity. On the hearing agenda, it indicated that the respondent should have been cross-examined first; however, the complainant went first.

Case Study: The Missing Pages

The respondent has filed an appeal claiming a procedural irregularity and new evidence. They received the final report without the complainant’s written response to the report. It seems that those pages were omitted. The respondent claims that they were unaware of the missing pages because there were no page numbers. The respondent stated that they were not able to prepare accurately for the hearing.

Case Study: The Witness

The complainant has filed an appeal claiming new evidence. The complainant stated that they just learned of a witness to the incident (alleged sexual assault at a fraternity party). A fraternity brother of the respondent walked into the room as the respondent was penetrating the complainant. The witness had not come forward earlier for fear of retaliation.
Case Study: The Fan

A recent student sexual harassment case resulted in a finding of “not responsible.” The complainant has submitted an appeal claiming investigator bias. The appeal states that the investigator was biased against her because the investigator favored the respondent, a football player. The complainant referenced being interviewed in the investigator’s office which had school football paraphernalia displayed, including a signed football with the respondent’s signature.

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  - October 4 - 8, 2021
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  - August 23 - 27, 2021
- Advanced Investigations (9:00 AM - 5:00 PM (Eastern Time))
  - November 8 - 12, 2021

For more information: dstaffordandassociates.com
Upcoming D. Stafford Virtual Classes

- Behavioral Intervention Team/Threat Assessment Team Training (10:00 AM - 5:30 PM Eastern)
  - June 22 - 24, 2021
  - December 1 - 3, 2021

For more information: dstaffordandassociates.com

8th ANNUAL NACCOP CONFERENCE: A Live, Virtual Event

Conference - July 21-23, 2021
Pre-Conferences - July 20, 2021

- Pre-Con #1 for CCOs: Addressing VAWA Policy Statements for Non-Title IX Procedures in the Annual Security Report
- Pre-Con #2 for CCOs: Developing Internal Memorandums of Understanding (MOUs) with Key Departments to Facilitate a Higher Level of Institutional Cooperation with Clery Act

2021 ADVANCED TRACK OPTION: Case Reviews: These sessions include a Case Review where attendees will participate in reviewing a sample incident report narrative to determine the correct classification and count for each report and to practice adding entries to the Daily Crime Log. This session will provide practitioners with an opportunity to apply their knowledge to real-world scenarios.

The finalized agenda will be released in the late Spring of 2021.

Register at www.naccop.org

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Introduction

- Today’s webinar is being conducted by the National Association of Clery Compliance Officers and Professionals (NACCOP).
- It is sponsored by D.Stafford & Associates.
- Once the webinar begins and throughout the presentation, you may submit questions by typing them into the question box (Not chat) in the panel to the right of your screen. We will review questions and ask as many as possible at the end of the webinar.
- Although we will not be recording this webinar, we sent out the presentation slides prior to the webinar for your reference.
NACCOP White Paper

Incident Report Writing and Records Management Systems for Clery Act Compliance: Considerations for Campus Police and Public Safety Agencies

To access, visit: https://go.omnigo.com/reporting-campus-crimes-accurately

Adrienne Meador Murray

Director of Training and Compliance Activities for:
- D. Stafford & Associates and NACCOP
- 17-year law enforcement veteran
  - University of Richmond (Operations Lieutenant)
  - Davidson College (Chief of Police)
  - Trinity Washington University (Chief of Police)
- Executive Director, Equity Compliance and Civil Rights Services with D. Stafford & Associates since 2012.
- Author and lead instructor of DSA training programs, including:
  - Sex Crimes Investigations for Campus Police & Public Safety Officers
  - Title IX Coordinator/Investigator Training
  - Investigation of Domestic Violence, Dating Violence and Stalking for Campus Police, Public Safety, and Civil Rights (Title IX/Conduct) Investigations

Clery Act Crime Categories

- Primary Crimes (UCR Part 1)
- Hate Crimes
- Arrests and Referrals for Drug, Liquor and Weapon Violations
- Dating Violence, Domestic Violence and Stalking Incidents (VAWA Crimes)
Overlapping Conduct Violations

Title IX

Quid Pro Quo
Hostile Environment

Sexual Assault
Dating Violence
Domestic Violence
Stalking
Gender-based Hate Crimes

CLERY

Non-VAWA CLery
Crimes (Assault etc.)
Hate Crimes
Gender-based Hate Crimes

Other sex-based behaviors

Title VII

Sexual Harassment

• Quid pro quo
• Hostile Environment

Sexual Assault

• Rape (including sodomy, sexual assault with an object)
• Fondling

Dating Violence

Domestic Violence

Stalking

New Definition of Sexual Harassment

1. An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual’s participation in unwelcome sexual conduct;

2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient’s education program or activity;

Domestic Violence

A felony or misdemeanor crime of violence committed by:

• a current or former spouse or intimate partner of the victim,
• by a person with whom the victim shares a child in common,
• by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner,
• by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred OR
• by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Dating Violence

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

i. The existence of such a relationship shall be based on the reporting party’s statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

ii. For the purposes of this definition—
   A. Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
   B. Dating violence does not include acts covered under the definition of domestic violence.

Distinguishing Between Dating and Domestic Violence

Per the Help Desk:

- Domestic Violence is intended to include situations where the victim and perpetrator currently have, or have had in the past, a relationship of a domestic nature. This means that they are currently or formerly married, have cohabitated as intimate partners, or have had an intimate relationship of a similar domestic nature.

- Dating Violence is intended to include situations where the victim and perpetrator have, or have had, a social relationship of an intimate nature, but have not entered into a domestic relationship as described above. The most common example is a dating relationship where the two parties do not live together, have never been married, and do not share a child in common.
Stalking

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—

A. Fear for the person's safety or the safety of others; or
B. Suffer substantial emotional distress.

For the purposes of this definition—

A. *Course of conduct* means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any means—follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.

Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Sexual Assault

- The definition (from VAWA) of sexual assault.
  - *Sexual Assault*: An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."
Sexual Assault

- Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- Fondling: The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- Incest: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Title IX Applicability/Jurisdiction

- Who
- Location
- Educational program or activity

Mandatory Dismissal

For it to be covered under Title IX, it must meet:
- New Definitions
- Jurisdiction of person
- Jurisdiction of activity

If it does NOT meet these requirements…
- Mandatory dismissal
- Can go to a different resolution process
Likely outside of Title IX

**Title VII**
- Hostile environment harassment below Title IX bar

**VAWA Requirements**
- Non-Sex-based Stalking
- Domestic violence involving family member

**Other Sex-based behaviors**
- Gender-based discrimination
- Sexual Exploitation

Limitations on Interim Action

**Supportive Measures**

**Emergency Removal**

**Non-punitive**

**Immediate health and safety risk**

Advisors

Throughout investigation

Role at hearing
Violation Intersections

Non-Title IX Cases

Where do they go?

Student Code of Conduct
Employe e Guide

VAWA PROCEDURAL REQUIREMENTS
Response Requirements for VAWA Offenses

Procedures victims of VAWA Offenses should follow

Procedures an institution will follow when offense reported

and make sure it is all in WRITING.

Written Explanation of Student or Employee’s Rights

(b)(11)(vii) “When a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee a written explanation of the student's or employee's rights and options, as described in paragraphs (b)(11)(ii) through (vi) of this section...”

Written Explanation of Rights and Options

1. The importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order
   - Not required but recommended: Where to obtain forensic exams, contact info, does not require police report and can have exam now, decide later
2. How and to whom the alleged offense should be reported
   - List any person or organization that can assist the victim
   - Recommended: Also include community organizations
Written Explanation of Rights and Options

3. Notification of the victim’s option to:
   - Notify proper law enforcement authorities, including on-campus and local police;
   - Be assisted by campus authorities in notifying law enforcement authorities if the victim so chooses; and
   - Decline to notify such authorities.

4. The rights of victims and the institution’s responsibilities for:
   - Orders of protection,
   - “no contact” orders,
   - Restraining orders, or
   - Similar lawful orders issued by a criminal, civil, tribal, or institutional authority.

5. To students AND employees about existing:
   - Counseling
   - Health
   - Mental Health
   - Victim Advocacy
   - Legal Assistance
   - Visa and Immigration Assistance
   - Student Financial Aid
   - Other services available for victims
   - Options for, available assistance in, and how to request changes to (if requested and reasonably available):
     - Academic, Living, Transportation, Working

7. Confidentiality
   - Publicly available recordkeeping has no personally identifying information about the victim, (not required for respondent but best practice in most cases).
   - Accommodations and protective measures are confidential (to the extent they can be without impairing the ability to provide them).

8. Disciplinary Procedures
   - An explanation of the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, as required by paragraph (k).
Response to “Actual Knowledge”

<table>
<thead>
<tr>
<th>2020 Title IX Regulations</th>
<th>Clery Act</th>
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<tbody>
<tr>
<td>• Contact the Complainant</td>
<td>• Written explanation of victim’s rights and options including:</td>
</tr>
<tr>
<td>• Offer and/or implement supportive measures</td>
<td>• procedures to follow (preserve evidence, where report)</td>
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<tr>
<td>• Explain the process for filing a formal complaint</td>
<td>• information about confidentiality</td>
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<td>• existing counseling, mental health, assistance etc</td>
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<td>• access to law enforcement and no contacts etc</td>
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<tr>
<td></td>
<td>• changes to academic, living, transportation and working situations, institutional procedures</td>
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<tr>
<td></td>
<td>• process for Institutional disciplinary process</td>
</tr>
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<td></td>
<td>• Assess for Timely Warning Notice OR Emergency Notification</td>
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Clery Requirements for Disciplinary Proceedings

- Anticipated timelines ("reasonably prompt")
- Decision-making process
- How to and options for filing a school complaint (with contact info)
- How school determines which process to use
- Who makes decisions
- Include employee procedures
- Use procedures regardless of Clery geography

Advisors under Clery

Advisor Requirement
- Advisor - individual who provides support, guidance, or advice
- Do not limit the choice of advisor
- May restrict participation if apply equally
- Provide timely notice of meetings
- May form a pool of people
- Can remove a disruptive advisor
- Could allow them to serve as a proxy
- Don’t have to delay for them (but encouraged to be reasonable)
Advisor Requirement

Standard of Evidence

- 2020 Title IX Regulations
  - Either the preponderance of the evidence standard or the clear and convincing standard but must be the same for all sexual misconduct

- Clery Act
  - Any standard of evidence must include in policy
  - Would not prohibit using different standards for different groups

Informal Resolutions

- 2020 Title IX Regulations
  - Can offer, but may not require
  - Not allowed for “employee on student” sexual harassment
  - Party may withdraw up to a point

- Clery Act
  - Written information about procedures the institution will follow for VAWA offense (does not differentiate between formal vs informal)
Formal Complaint Rights

2020 Title IX Regulations
- Treat equitably with a goal to restore/preserve access to education; due process for respondent;
- Include presumption of not responsible;
- Include any discipline for false statements;
- Reasonable prompt time-frames;
- Describe the range of sanctions;
- Describe range of supportive measures.

Clery Act
- Prompt, fair, and impartial investigation and resolution;
- Anticipated timeframes;
- List all possible sanctions for each offense (employees and students);
- Consistent with policy and transparent;
- Not required to list all protective measures.

Formal (Live Hearing)

2020 Title IX Regulations
- Requires live hearing with cross examination by advisor.

Clery Act
- Clery is silent regarding live hearing.

Written Determination

Title IX
- Identification of the allegations;
- Notification to the parties;
- Interviews with parties and witnesses;
- Site visits;
- Methods used to gather other evidence;
- Hearings held.

Clery Act
- Result (include any sanctions and rationale for results and sanction);
- Appeals procedures;
- Any change to the result;
- When such results become final.

Appeals procedures
- When results become final.
Clery Requirements for Officials

- Training must be described in ASR
- Annual
  - Should include (at a minimum):
    - Relevant evidence and how it should be used
    - Proper interview techniques
    - Basic procedural rules for conducting a proceeding
    - Avoiding actual/perceived conflicts
- Can be in person or electronic (webinar or video)

Bias Free and Training for "Officials"

**Title IX ("Title IX Personnel")**
- Annual training on
  - the issues related to dating violence, domestic violence, sexual assault and stalking and on
  - how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability

**Clery ("Officials")**
- Training for all on
  - Relevant evidence and how it should be used
  - Proper interview techniques
  - Basic procedural rules for conducting a proceeding
  - Avoiding actual/perceived conflicts
- Can be in person or electronic (webinar or video)

Appeals

**2020 Title IX Regulations**
- Must offer both parties an appeal
- Based on specific grounds

**Clery Act**
- Not required (but must provide notice if allowed along with appeal procedures)
- Simultaneous written decision describing result, sanction, any changes to the result, when it becomes final
Recordkeeping

2020 Title IX Regulations
• 7 years

Clergy Act
• Retain all records used in compiling ASR for three years from the latest publication of the report to which they apply (in effect 7 years)

VAWA Education Requirements

Education and Prevention under Clergy

Annual training for conducting "officials" (Investigators, Adjudicators, Appeals)

Primary Prevention and Awareness Programs for all incoming students and new employees

Ongoing Prevention and Awareness Campaigns for ALL students and employees

CSA Training and "Super" CSA Training
Primary Prevention Best Practices

“Programming, initiatives, and strategies intended to stop dating violence…stalking…before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in a health and safe directions.”

• Not required that all students take or attend (but mandate encouraged)
• Must show “good faith effort” to reach them with “active notification”
• Format and timeframe encouraging maximum attendance
• Equally important to prevent perpetration as it is to prevent victimization

Primary Prevention & Awareness

“The institution’s primary prevention and awareness programs for all incoming students and new employees, which must include…”

◼ Statement prohibiting dating DV/DVSAS
◼ Definitions of DV/DVSAS
◼ Definition of consent
◼ Safe and positive options for bystander intervention;
◼ Information on risk reduction

Ongoing Prevention & Awareness

“Ongoing prevention and awareness campaigns for students and employees…must provide the same information as the primary awareness and prevention programs”

◼ Deeper dives
◼ Sustained over time
◼ Promote services
◼ Range of strategies/audiences
  ◦ Social media, email, posters, ads
  ◦ Take Back the Night
  ◦ Sports teams, Greek, dorms
  ◦ Student fairs or campus events
  ◦ DV program for supervisors
**CSA Training (Recommendations, Not Requirements)**

- Role of a CSA
- Provide Reporting materials
  - Map of Clery geography
  - Definitions of Clery crimes
  - Forms for documenting and reporting
- Importance of documentation
- Need for timely reporting
- “Super CSAs?”
- Personally Identifiable Information

---

**Clery Act Compliance Training Academy**

**In-Person Classes**

- The Clery Act Compliance Training Academy is nationally recognized as the preeminent training program designed to teach practitioners how to comply with the complex requirements of the Clery Act. This training academy experience will benefit individuals who have not had previous Clery Act training (we start with the basics and work into the advanced concepts) and those who want to enhance their knowledge of the law.

- **Class Dates:**
  - August 2-6, 2021
  - October 18-22, 2021

- **Cost:**
  - $775.00

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**Clery Act Compliance Training Academy: Live, Virtual Classes**

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- **Class Dates:**
  - March 1-5 and March 8-12, 2021
  - May 3-7 and May 10-14, 2021
  - November 29-December 3 and December 6-10, 2021

- **Cost:**
  - $775.00

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DSA Advanced Clery Act Training Academy: Practical Application

The ADVANCED Clery Act Compliance Training Academy is a 3 ½ day training program that provides an opportunity for attendees to build upon the foundation provided in the D. Stafford & Associates Clery Act Compliance Training Academy through a combination of instruction, discussion, and group-based learning activities that explore how to practically apply relevant laws and ED guidance to some of the most vexing issues facing practitioners. This experience is designed to be interactive, with attendees participating in group analysis and exercises throughout the 3 ½ days. Participants will be able to assess their ability to competently apply the law to specific scenarios and problems while evaluating pertinent operating procedures and practices that relate to complying with the Clery Act.

VISIT OUR WEBSITE FOR MORE INFORMATION ABOUT IN-PERSON CLASSES IN 2021
www.dstaffordandassociates.com

Title IX/Investigation of Sexual Misconduct: Live, Virtual Classes

Combined Sexual Misconduct and Dating/Domestic Violence and Stalking Investigation Training Class
11:00 am to 5:00 pm each day
- April 12-16, 2021
- August 23-27, 2021

Title IX Coordinator/Investigator Training
11:00 am to 5:00 pm each day
- February 22-26, 2021
- May 3-7, 2021
- October 4-8, 2021

Advanced Investigations Course: Investigations of Sexual Misconduct—Conducting Trauma Informed Investigations
Designed for Campus Police/Public Safety/Title IX & Conduct Officers
9:00 am to 5:00 pm each day
- March 8-12, 2021
- June 7-11, 2021
- November 8-12, 2021

Questions?
Thanks to our sponsors!

D. Stafford & Associates