



THE UNIVERSITY OF  
**CHICAGO**

Office of the Provost  
Office for Equal Opportunity Programs

# **Preventing Sexual Violence in Higher Education Act Annual Report**

**University of Chicago**

**November 1, 2017**

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## University of Chicago Executive Summary

The University of Chicago is committed to creating an environment that is free from all forms of sex discrimination, sexual harassment, sexual abuse, sexual assault, dating violence, domestic violence, and stalking. This behavior may violate the law, does violate the standards of the community, and is unacceptable at the University of Chicago. Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in education programs and activities operated by recipients of federal financial assistance, which includes the University of Chicago. The University of Chicago is consistent with its legal obligations and in keeping with its long-standing traditions and policies against discrimination.

This report was prepared in compliance with the Illinois Preventing Sexual Violence in Higher Education Act (110 ILCS 205/9.21 (b)). Under this law, the University of Chicago must meet several requirements, including: developing a comprehensive policy, including a procedure to resolve complaints; providing students with a confidential advisor; participating in a task force; offering annual training to students and campus employees; and reporting information and data annually to the Illinois Attorney General's Office.

All alleged incidents of harassment, discrimination, and sexual misconduct (including sexual harassment, sexual abuse, sexual assault, domestic violence, dating violence, and stalking) are handled in accordance with the University's Policy on Harassment, Discrimination, and Sexual Misconduct. The University's procedures for handling incidents of alleged harassment, discrimination, or sexual misconduct depend on the nature of the incident, the relationship of the accused to the institution, and, to the extent possible, the wishes of the person bringing forward the complaint. The University makes substantial efforts to address allegations of sexual misconduct and ensures that the response to such incidents is conducted in a prompt and thorough manner that is equitable for all participants, best services the university community, and complies with the applicable laws and regulations.

The complaint resolution procedure applicable to alleged student violations of the Policy is the University-wide Disciplinary Process, which is centrally managed by the Associate Dean of Students in the University for Disciplinary Affairs, Jeremy Inabinet. There are both formal and administrative options available within the University-wide Disciplinary process. Additionally, students who have reported sexual misconduct, dating violence, domestic violence, or stalking have the right to request interim protective measures and/or reasonable accommodations, including, but not limited to:

- Changes to academic, living, dining, working, or transportation situations
- Obtaining and enforcing a University-issued no contact directive
- Assistance in obtaining an order of protection or no contact order in State court
- Medical assistance (including information on preserving evidence)
- Legal/law enforcement options (including assistance with notifying local law enforcement)

- Safety planning
- On- and off-campus referrals and resources
- Assistance with accessing and navigating campus and local health and mental health services, counseling, and advocacy

In compliance with the Violence Against Women Reauthorization Act of 2013 (“VAWA”) and the Clery Act, the University uses the State of Illinois Criminal Code’s definitions of sexual assault and sexual abuse. The University incorporates the State’s definitions of several other important terms, including domestic violence, dating violence, and stalking and recognizes that sexual assault, domestic violence, dating violence, and stalking are not gender-specific crimes into the University Policy on Harassment, Discrimination, and Sexual Misconduct.

The numbers provided within this report were reviewed using the following parameters included in the Preventing Sexual Violence in Higher Education Act (110 ILCS 205/9.21(b)) and Frequently Asked Questions Regarding Reporting Requirements document issued by the Illinois Attorney General on June 1, 2017:

- For requirements that took effect on August 1, 2016, the school may report data from August 1, 2016 – December 31 2016; and
- Reported incidents should only pertain to “sexual violence, domestic violence, dating violence, and stalking;” and
- Data should be reported “whether filed against another student, an HEI employee, or someone unaffiliated with the HEI” and that data regarding disciplinary processes should be “related to complaints made by students against students subject to discipline under the HEI’s complaint resolution procedure;” and
- “Schools should only report data related to complaints of incidents that occurred within the geographic areas defined by the Clery Act...if a report does not include a location of the incident alleged in the complaint, schools should include that report or disclosure in its data and may annotate.”

The statistics for this report cover the period from August 1 – December 31, 2016. In the future, such reports will cover the entire calendar year.

Clarification regarding these reporting requirements and appropriate data collection was solicited via the Chicagoland Title IX Consortium during and following the Consortium meeting with representatives of the Illinois Attorney General’s Office on Friday, September 15<sup>th</sup>, 2017, but as of the writing of this report, no additional clarification has been given.

This law and these reporting requirements may differ from other reporting guidelines, requests for information, and published documents, including, but not limited to, the Annual Security and Fire Safety Report.

We recommend reading the report in its entirety to understand the full context of the report.

## PART A

- I. **Provide a copy of the higher education institution's comprehensive policy -**  
<https://harassmentpolicy.uchicago.edu/page/policy> (Appendix A)
- II. **Provide a copy of the higher education institution's concise, written notification of a survivor's rights and options under its comprehensive policy –**  
<https://voices.uchicago.edu/equity/files/2017/03/Title-IX-Student-Information-Sheet-sn8ce2.pdf> (Appendix B)

## PART B

### I. **Campus Training, Education and Awareness**

#### a. **Student Primary Prevention Programming**

*Identify any and all institutional actions and strategies intended to prevent sexual violence before it occurs by means of changing social norms and other approaches, including, without limitation, training programs, poster and flyer campaigns, electronic communications, films, guest speakers, symposia, conferences, seminars or panel discussions that occurred during the 2016 calendar year.*

As part of its commitment to fostering an environment free of harassment, discrimination, and sexual misconduct, the University offers educational programs, campaigns, and training. These programs address, among other things, the requirements of the Violence Against Women Reauthorization Act of 2013 (VAWA) and its implementing regulations, the Illinois Preventing Sexual Violence in Higher Education Act, and promote prevention and awareness of sexual harassment, sexual assault, dating violence, domestic violence, and stalking.

Primary prevention and awareness programs for students include:

- The University requires all students (including graduate and professional students) receive annual training regarding the University's Policy on Harassment, Discrimination, and Sexual Misconduct— including the processes, reporting obligations, and resources contained therein. The training also covers, among other things, 1) consent; 2) retaliation; 3) reporting to confidential resources; 4) resources/survivor services; and 5) strategies for bystander intervention and risk reduction. Campus Clarity, a subsidiary of EverFi, provides these online training modules. The University had a 97.6% completion rate by December 31, 2016.
- All incoming students in the College also receive training programs called "Haven" (an online training program that addresses relationships, sexual health, consent, and sexual assault) and "AlcoholEdu" (an online training program to help reduce high-risk drinking and alcohol-related harm). The University had a 98% completion rate by December 31, 2016.

- Supplemental student training was also offered throughout the year on the following topics:
  - Title IX and the University Policy on Harassment, Discrimination, and Sexual Misconduct - This training was delivered by the Office for Equal Opportunity Programs to approximately 1800 students (undergraduate and graduate/professional) from a variety of academic departments and registered student organizations who requested additional information on 1) support/resources; 2) Title IX intake process; 3) University policy; 4) confidential resources and responsible employee responsibilities; and 5) prevention programs and risk reduction.
  - The Intercourse – This educational session was offered by the Office for Health Promotion and Wellness to approx. 480 students (undergraduates) living in Housing and Residence Life. The session provided information on 1) educating students on healthy relationships; 2) providing resources for sexual health; and 3) providing support mechanisms for resources related to sexual assault.
- The University also participates in a number of campaigns to raise awareness regarding sexual misconduct, including Sexual Violence Awareness Month, Domestic Violence Awareness Month, the Educational Guidelines for Sexual Consent campaign, Speak Out Against Sexual Violence, the Clothesline Project, and a variety of other educational initiatives, resource fairs and outreach programs.
- The University’s Resources for Sexual Violence Prevention (RSVP) office offers ongoing programming to prevent, and promote awareness of, sexual violence. For example, RSVP teaches students to be peer educators through a 20-hour training program and offers workshops, activities, and events that help educate the University community about sexual violence and related issues. RSVP also provides educational and supportive services for the University of Chicago community related to sexual assault, intimate partner violence, and stalking. For more information regarding RSVP, visit <https://esl.uchicago.edu/rsvp>.
  - RSVP specifically engaged in the following activities and programming during the 2016 calendar year;
    - Tabling during “Sex Week,” which aims to create an open, safe and supportive space to discuss and explore sex and its role in our society.
    - Supplemental educational programs offered to approximately 2100 students from a variety of departments and organizations. These programs/workshops included Rape Culture and Bystander Intervention, Handling Disclosures Workshop, Rape Culture Town Hall, Sexual Assault 101, Mindfulness for Survivors, Safe and Lit, Survivor Stories Workshop, Neuroscience of Trauma, Intimate Partner Violence, New ER Procedures for Survivors in Illinois, and Spectrum of Services for Survivors.
    - RSVP brought several speakers, films/multimedia presentations, and all-campus events to campus including Rupri Kaur, A Long Walk Home (film), Melanie Foote-Davis, The Mask We Live In (film), Feminist Book Club, Echo Brown, Audrey & Daisy (film), and Hunting Ground (film).

- The Office for Equal Opportunity Programs, Disciplinary Affairs, and Resources for Sexual Violence Prevention collaborates on comprehensive Orientation programming for all first-year students through a mandatory educational session. This interactive presentation communicates the University policy and resources, bystander intervention, rape culture and prevention mechanisms, and discusses students' role in creating a socially responsible campus.
- The Office of the Provost's Student Advisory Board on Sexual Misconduct offers students an opportunity to serve as a liaison between the Office of the Provost and undergraduate, graduate, and professional students regarding student perspectives on sexual misconduct concerns, training, and prevention programs. These students provide input on policies, procedures, and programs pertaining to sexual misconduct and is chaired by the Deputy Title IX Coordinator for Students.
- The Office for Health Promotion and Wellness manages a Peer Health Advocate program in which 12 students apply for and are selected to support fellow students and empower them to make healthy choices. The Peer Health Advocates make outreach to students by connecting them to campus resources and offering education related to a variety of health and wellness topics including the Body Project and In Touch, which educates and empowers their peers to have healthy relationships and make informed decisions about their sexual health. All Peer Health Advocates receive training on University of Chicago specific resources for sexual misconduct.
- The Office for Equal Opportunity Programs created marketing materials during the 2016 calendar year including posters with confidential/private/emergency resource numbers, brochures regarding Title IX support, confidentiality charts for campus personnel, and informational sheets designed for the campus community defining nonconsensual sexual activity and providing information on intimate partner violence. Additionally, the Provost and Dean of Students of the University and the Associate Provost/Title IX Coordinator for the University sent email communications to the campus community addressing the institution's commitment to subjects related to Title IX and sexual misconduct.
- Updates to the U\_Matter ([umatter.uchicago.edu](http://umatter.uchicago.edu)) and the Office for Equal Opportunity Programs ([equalopportunity.uchicago.edu](http://equalopportunity.uchicago.edu)) websites were initiated during the 2016 calendar year.

**b. Employee Training**

*Identify any and all training provided to higher education institution employees who, with respect to reports of sexual violence, domestic violence, dating violence or stalking: (1) receive student reports, (2) refer or provide services to survivors or (3) participate in the complaint resolution procedure*

In addition to student primary prevention programs, the University also requires the following of faculty, other academic appointees, staff, and postdoctoral researchers:

- All faculty members and other academic appointees receive training regarding, among other things, the University's Policy on Harassment, Discrimination, and Sexual

Misconduct—including the processes, reporting obligations, and resources contained therein. 761 faculty and other academic appointees completed this training during the 2016 calendar year.

- All staff members and postdoctoral researchers receive training regarding, among other things, the University’s Policy on Harassment, Discrimination, and Sexual Misconduct - including the processes, reporting obligations, and resources contained therein. 5,594 staff and postdoctoral researchers completed this training during the 2016 calendar year.
- The University requires all new employees (including faculty) to take sexual misconduct prevention training – either online through “Intersections” offered by EverFi or in-person with staff from the Office for Equal Opportunity Programs. Among other things, these programs provide interactive training on how to prevent, identify, and report sexual misconduct.
- All individuals whose duties include resolution of complaints of student violations of the Policy on Harassment, Discrimination, and Sexual Misconduct must receive a minimum of eight hours of annual training on issues related to sexual violence, domestic violence, dating violence, and stalking and how to conduct the University’s complaint resolution procedures, in addition to the training described above.
- All individuals serving in a Sexual Assault Dean on Call role and the confidential advisor in Student Counseling Services must complete a minimum of eight hours of annual trauma-informed training on issues related to sexual violence, domestic violence, dating violence, and stalking.
- Supplemental employee training was also offered throughout the year on the following topics:
  - Title IX and the University Policy on Harassment, Discrimination, and Sexual Misconduct. This training was delivered to approximately 325 employees with student-facing positions from a variety of academic departments and support teams who requested additional information on 1) support/resources; 2) Title IX intake process; 3) University policy; 4) confidential resources and responsible employee responsibilities; and 5) prevention programs and risk reduction.

## II. Reports

*Identify the total number of reports made to the following groups of individuals in the 2016 calendar year. For requirements that took effect on August 1, 2016, the school may report data from August 1, 2016 – December 31 2016. If a higher education institution is aware that a student reported an incident more than once, it may provide an explanation for this or any other additional information regarding its reports in Part C below.<sup>1</sup>*

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<sup>1</sup> The Illinois Attorney General’s Frequently Asked Questions Regarding Reporting Requirements document indicates “for requirements that took effect on August 1, 2016, the school may report data from August 1, 2016 through December 31, 2016, if it does not have earlier data.”

## Reporting Options at the University of Chicago

Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in education programs and activities operated by recipients of federal financial assistance (like the University of Chicago). Consistent with its legal obligations and in keeping with its long-standing traditions and policies against discrimination, the University of Chicago is committed to creating an environment that is free from all forms of sex discrimination, sexual harassment, sexual abuse, sexual assault, dating violence, domestic violence, and stalking. This behavior may violate the law, does violate the standards of our community, and is unacceptable at the University of Chicago. All alleged incidents of harassment, discrimination, and sexual misconduct (including sexual harassment, sexual abuse, sexual assault, domestic violence, dating violence, and stalking) are handled in accordance with the University's Policy on Harassment, Discrimination, and Sexual Misconduct. The University's procedures for handling incidents of alleged harassment, discrimination, or sexual misconduct depend on the nature of the incident, the relationship of the accused to the institution, and, to the extent possible, and the wishes of the person bringing forward the complaint.

It is important to note that University employees, depending on their role, have different abilities to maintain confidentiality.

Confidential resources are available to provide support, resources, and information to students. These individuals do not share identifying information about people or incidents without the student's consent.

- Sexual Assault Dean on Call can be reached 24/7, 365 days a year to answer any general or personal questions related to sexual misconduct, including questions about Title IX, University policy and processes, resources and support services, filing a report with local law enforcement, or obtaining medical assistance.
- Student Counseling Service providers
  - Student Counseling Service also has a named "confidential advisor" on staff who has undergone 40 hours of initial specialized training pertaining to sexual and relationship violence, and subsequent annual training hours thereafter.
- Student Health Service providers
- Ordained Religious Advisors

All University employees not designated as confidential resources are considered Responsible Employees. Responsible Employees must report all incidents of sexual harassment, sexual assault, sexual abuse, dating violence, domestic violence, and/or stalking to the Title IX Coordinators. Responsible Employees cannot guarantee confidentiality, but can promise privacy through the process. Responsible Employees include faculty and instructors, Resident Assistants, Resident Heads, Resident Deans, TAs/Graduate Assistants, preceptors, administrative assistances, UCPD staff, athletic coaches, and other University employees.



Anonymous reports can be submitted through the UMatter: Student Resources for Resolution website found here: <http://umatter.uchicago.edu/file-a-report/add-to-the-university/anonymous-reporting/>.

### Data Reporting Requirements

The reports noted below were reviewed using the following parameters included in the Preventing Sexual Violence in Higher Education Act (110 ILCS 205/9.21(b)) and Frequently Asked Questions Regarding Reporting Requirements document issued by the Illinois Attorney General on June 1, 2017:

- For requirements that took effect on August 1, 2016, the school may report data from August 1, 2016 – December 31 2016; and
- Reported incidents should only pertain to “sexual violence, domestic violence, dating violence, and stalking;” and
- Data should be reported “whether filed against another student, an HEI employee, or someone unaffiliated with the HEI” and that data regarding disciplinary processes should be “related to complaints made by students against students subject to discipline under the HEI’s complaint resolution procedure;” and
- “Schools should only report data related to complaints of incidents that occurred within the geographic areas defined by the Clery Act...if a report does not include a location of the incident alleged in the complaint, schools should include that report or disclosure in its data and may annotate.”

Clarification regarding these reporting requirements and appropriate data collection was solicited via the Chicagoland Title IX Consortium during and following the Consortium meeting with representatives of the Illinois Attorney General’s Office on Friday, September 15<sup>th</sup>, but as of the writing of this report, no additional clarification has been given.

This law and these reporting requirements may differ from other reporting guidelines, requests for information, and published documents, including, but not limited to, the Annual Security and Fire Safety Report.

### **Student reports against students, not affiliated, or unknown respondents between August 1, 2016 – December 31, 2016**

	<b>Reports to the Title IX Coordinator/Responsible Employees</b>
Sexual Violence <sup>2</sup>	12 <sup>3,4</sup>

<sup>2</sup> Under the University of Chicago’s Policy on Harassment, Discrimination, and Sexual Misconduct, sexual violence incorporates both sexual assault and sexual abuse.

<sup>3</sup> These 12 reports of sexual violence include four reports from past time periods that were reported during the August 1 – December 31, 2016 timeframe.

Domestic Violence	0
Dating Violence	2
Stalking	8 <sup>5</sup>

There were 15 reports to our Sexual Assault Deans on Call, which are considered the University's primary confidential resource. The reports to the Sexual Assault Deans on Call are being reported in aggregate form from August 1, 2016 – December 31, 2016 for all cases inclusive of sexual violence, domestic violence, dating violence, and stalking.<sup>6</sup> Student Counseling Service, another confidential resource which houses our "confidential advisor," reported 7 incidents in aggregate form for the same timeframe of August 1 – December 31, 2016. While every effort was made to obtain aggregate numbers from confidential and anonymous resources, the University is limited in receiving this information due to privileged providers, electronic medical records, and University affiliates who are not employed by the University.

**Student reports against employees (faculty/staff) between August 1, 2016 – December 31, 2016**

	Report
Sexual violence	2 <sup>7</sup>
Dating violence	0
Domestic violence	0
Stalking	0

**a. Responses to Reports to the Title IX Coordinator or Responsible Employees**

*Of the total number of reports or disclosures made to the Title IX Coordinator or responsible employees at the higher education institution (identified in Part B, Section II), please report the number of times a survivor requested not to proceed with the complaint resolution procedure, HEI investigated allegation, HEI referred allegation to local or State law enforcement, and HEI resolved allegation through complaint resolution procedure:*

<sup>4</sup> These 12 reports include four reports with an unknown location.

<sup>5</sup> Two stalking reports were reported to have occurred primarily over social media, but included here given location of complainant when they received the communication.

<sup>6</sup> Two of these reports were double counted in the data analysis of reports to the Title IX Coordinator and/or Responsible Employees.

<sup>7</sup> On December 1, 2016, the University received an anonymous report from a person, claiming to be a student, containing two allegations of potential sexual misconduct by a faculty member. These are listed as two separate reports. The report did not identify where the alleged conduct occurred. Both allegations were investigated by the University.

Every student who is reported to have experienced any incident of sexual misconduct, dating violence, domestic violence, or stalking receives a one-page information sheet (referenced in Appendix B), which refers them to support/resource mechanisms both on and off campus, including medical assistance and law enforcement. The University's procedures for handling incidents of alleged harassment, discrimination, or sexual misconduct depends on the nature of the incident, the relationship of the accused to the institution, and, to the extent possible, the wishes of the person bringing forward the complaint.

Of the 22 reports to the Title IX Coordinator/Responsible Employees during the August 1 – December 31, 2016 timeframe, 12 did not respond to outreach from the Deputy Title IX Coordinator for Students. Interim measures and accommodations were requested by individuals in the remaining 10 reports, which included request for No Contact Directives, academic accommodations, Housing and Residential Life outreach, Student Counseling Service referrals, and interim bans from campus for alleged perpetrators. Students have a choice on whether they proceed with both law enforcement referrals and the University-wide Disciplinary Process.

While students are always referred to local or State law enforcement through the one page informational sheet given to students at time of report and in any subsequent meeting with the Title IX Coordinator, we are aware of one incident during the August 1 – December 31, 2016 in which the University of Chicago's Police Department assistance was requested by the student. It is the student's decision whether to file a report with local law enforcement independent of the University's resolution process

The University-wide Disciplinary process is the complaint resolution procedure applicable to alleged student violations of the Policy on Harassment, Discrimination, and Sexual Misconduct. Of the 22 reports to the Title IX Coordinator/Responsible Employees during the August 1 – December 31, 2016 timeframe and defined by the Illinois state law for Preventing Sexual Violence in Higher Education, 17 reports were eligible to move through this complaint resolution procedure. The other five cases included either (1) individuals as the alleged perpetrators who were not affiliated with the University or (2) the individual disclosing the complaint was neither the complainant nor respondent, but rather a concerned individual who reported an incident and the University determined there was not a basis to proceed. Of the cases that were eligible to proceed through the complaint resolution procedure, one chose to enter the process during the August 1 – December 31, 2016 timeframe.<sup>8,9</sup>

#### **b. Complaint Resolution Procedure Outcomes**

<sup>8</sup> There were three other complaint resolution procedures that took place during the August 1 – December 31, 2016 timeframe, but for incidents that were reported before August 1, 2016. Of those complaints, one respondent was found responsible for sexual assault and suspended; one respondent was found responsible for dating violence and placed on probation with a no contact directive; and one respondent was found responsible for dating violence and placed on probation with a no contact directive plus limited access to facilities and programs.

<sup>9</sup> Another student filed a formal complaint with our University Wide Disciplinary Committee during this timeframe for an incident that occurred before August 1, 2016. The hearing for this case was held post December 1, 2016. The respondent in that case was found responsible for stalking and suspended.

*Of the total number of reports reviewed through the complaint resolution procedure, identify the number of students who received the following outcomes. Please provide a description of the other types of discipline students received for violating the comprehensive policy in Part C of this report.*

As explained above, one formal complaint responsive to this question was filed with the Associate Dean of Students in the University for Disciplinary Affairs between August 1 – December 31, 2016, and was investigated. Information regarding the case was brought to the faculty chair of the University-wide Disciplinary Committee (UWDC) for review. Following the investigation, the faculty chair dismissed the complaint.

### **PART C**

- I. Use this space to provide any explanations or clarification for information and data provided as part of the report

#### **Reporting Information:**

The reports noted below were reviewed using the following parameters included in the Preventing Sexual Violence in Higher Education Act and the Board of Higher Education Act (110 ILCS 205/9.21(b)) and Frequently Asked Questions Regarding Reporting Requirements document issued by the Illinois Attorney General on June 1, 2017:

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- Reported incidents should only pertain to “sexual violence, domestic violence, dating violence, and stalking;” and
- Data should be reported “whether filed against another student, an HEI employee, or someone unaffiliated with the HEI” and that data regarding disciplinary processes should be “related to complaints made by students against students subject to discipline under the HEI’s complaint resolution procedure;” and
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