

MEMORANDUM

Date: June 17, 2019

To: Joe Harroz, President

From: Bobby Mason, Institutional Equity Officer

Subject: Proposed Equal Opportunity and Title IX Initiatives

On May 3, 2019, the Office of Institutional Equity proposed the following recommendations to enhance our overall Equal Opportunity and Title IX initiatives:

Training and Awareness:

Online Training: Since 2012 the Office of Institutional Equity (OIE) has provided online Title IX/Sexual Misconduct Awareness training for all students and employees. While this course fulfills the Title IX requirements, it doesn't provide training and awareness regarding other forms of discrimination. The majority of institutions our size utilizes 3rd party vendors to provide comprehensive employee based training that include EO, Title IX, and other employee and student training topics. I'd propose that the HR Department conduct a review of available vendors and move toward a comprehensive online training program that standardizes training across all OU campuses.

Status: This will be a lengthy process that will take a significant effort and financial commitment. The VP of HR has agreed to initiate the discussion and review of possible solutions. No target date identified. Cost TBD.

In the interim, in 2019 the OIE updated existing Title IX and Sexual Misconduct Awareness training courses currently required for all students and employees. Additionally, the OIE conducts ongoing Non-Discrimination Awareness training for faculty, staff, and students across all campuses. There were 134 sessions held in 2018 with 4,699 participants.

Awareness Campaign: Despite the ongoing training efforts to ensure all members of the University community are aware of our resources and responsibilities related to sexual misconduct, it appears that some individuals are still unsure of available resources and specifically the mandatory reporting requirements for employees. I'd propose that we work together with our VP for Marketing and Communications to develop an informational campaign to launch annually in conjunction with the beginning of the fall semester.

Status: The VP of Marketing and Communication has agreed to work with the OIE and the Gender & Equality Center to develop a campaign to increase awareness of resources and responsibilities around our Title IX initiatives. Initial planning meeting being held July 1, 2019.

Additional Resources Office of Institutional Equity:

Office of Institutional Equity (OIE): The OIE was created in 2012 in response to ever-increasing state and federal regulation governing equity issues. Since 2012 these regulations and requirements have continued to increase to include, Non-Discrimination in Healthcare Requirements as required by the Health and Human Services, Affordable Care Act, National Sciences Foundation, and National Institute

of Health reporting requirements, and mandatory NCAA: Sexual Violence Prevention training for all Athletics Department Employees, Coaches, and Student Athletes. In 2016 the OIE assumed responsibility for receiving and responding to all reports of bias or prejudice behavior, physical or mental harassment, or unwelcome verbal or physical conduct, reported to the 24-Hour Reporting Hotline.

Additionally, the case load has continued to increase and the OIE received over 300 reports in the last twelve months. To ensure compliance with these ever-growing requirements and a timely response to these ever-increasing cases, the following personnel changes and additional positions are being implemented:

1. Create and fund a Title IX Office Intake/Interim Measures Coordinator position with annual salary of \$65,000. This position will serve as the initial contact for all EO/Title IX cases. With the proposed new DOE-OCR: Title IX guidelines, we expect to see a significant increase in requests for interim measures for both the Reporting Party and Respondent in cases of Sexual Misconduct. Previously the intake role was performed by the SMO or an Investigator which blurs the lines of roles in the investigation process. Success in the intake process is critical to gaining the trust of the reporting party and is vital to overall Title IX compliance.

Status: Funding approved, position description in development, goal to recruit and make selection by August 15, 2019.

2. Create and fund an additional OIE Investigator (Norman Campus), with an annual salary of \$60,000. Since the current structure of the OIE was developed the case load has increased significantly averaging approx. 165 cases in our SMO and 70 in our EOO. Additionally, we consistently have 6-10 external cases pending with the EEOC/DOE-OCR or OCRE.

Status: Funding approved, goal to recruit and make selection by August 1, 2019. Need to identify office space for this position.

3. Create and fund an OIE Investigator (HSC Campus) with an annual salary of 60,000 on the HSC Campus. The case load on the HSC Campus has gone from 8 cases in 2012 to 50 in 2018. The HSC EO/TIX Office has only one full time employee.

Status: Funding approved, goal to recruit and make selection by August 1, 2019. Need to identify office space for this position.

4. Financial Resources: The current operating budget for the OIE covers the salaries for current personnel and basic daily operating cost. As a result we have experienced consistent turnover of our experienced staff due to higher salaries being offered by other employers. In order to retain our current investigative staff, I'd propose a 10% increase (\$5,900) for our current lead EO and Title IX investigators and a \$20,000 increase in operating funds to provide ongoing prevention and awareness campaign and to provide professional EO/Title IX education for our staff.

Status: Funding approved effective July 1, 2019. Plan to increase salaries for Lead EO and Lead Title IX Investigators Sept 1, 2019. Additionally, these funds will allow our current OIE Investigators to attend advanced training on Conducting Trauma-Informed Title IX Investigations prior to the new academic year.

Additional Resources Gender & Equality Center:

The Gender + Equality Center (GEC) provides services to the entire campus community in three major areas: gender-based violence awareness, prevention, and advocacy; LGBTQ programs, education, and services; and equality and social justice efforts that center gender identity and expression. In 2018 the OU Advocates program fielded approximately 125 calls to the program, 93 of which resulted in an Advocates case. In Fall 2018 we provided education to approximately 9,200 students, faculty, and staff across the Norman, Health Sciences Center, and Tulsa campuses. Overall, the Gender + Equality Center served over 15,000 people in 2018 alone.

The Gender + Equality Center's current staffing structure includes a Director (Administrator III), a Case Manager (University Student Program Specialist II), a Gender Based Violence Prevention Educator (University Student Program Specialist II), an LGBTQ Program Coordinator (University Student Program Specialist I), and an Office Manager (Administrative Assistant I).

Create and fund two additional GEC staff positions with an annual salary of 40,000. Our gender-based violence awareness and prevention education model is excellent and in high demand. Our community feels safe and empowered to reach out for assistance around traumatic instances of sexual assault, dating violence, stalking, and harassment. We have built a strong, supportive, and caring network, the best of the University of Oklahoma, to navigate these issues with our university community. Additional support is needed to ensure we can maintain this level of support.

Status: The VP and Dean of Students has this for action. Freeze forms submitted to HR, goal to recruit and make selection by September 1, 2019.