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January 7, 2016

Rebecca Chopp, Ph.D.
Office of the Chancellor
University of Denver
2199 S. University Boulevard
Denver, CO 80208

Dear Chancellor Chopp:

Thank you for the opportunity to assist the University of Denver (the University or DU) in conducting an external audit of the University's policies, procedures and practices related to sexual and gender-based harassment and violence¹ under Title IX of the Education Amendments of 1972 (Title IX) and related authority, including the intersection of Title IX with the Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act (Clery Act), as amended by § 304 of the Violence Against Women Reauthorization Act of 2013 (VAWA).

This letter serves as an addendum to our full report, submitted to the University on May 25, 2015. In our May report, we provided an overview of our professional background, outlined the scope of our engagement and detailed the evolving legal and regulatory requirements that govern the institutional response to sexual and gender-based harassment and violence. We also shared our observations about University practices during the 2014-2015 academic year and provided detailed and specific recommendations for effective practices.

We were first engaged in July 2014. At the time, the University had recently passed a Board Approved Discrimination/Equal Opportunity Policy 3.10.0101 (effective June 6, 2014). This policy amended the previous Equal Opportunity/Sexual Harassment Policy (effective date September 10, 2013). As set forth in our May report, we assisted Kathryn

¹ We recognize that domestic violence, dating violence and stalking are not exclusively forms of sex or gender-based harassment or violence, but for ease of reference in this report, the term sexual and gender-based harassment and violence should be read broadly to include conduct prohibited by Title IX and VAWA.

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Grove, then the Director of the Office of Equal Opportunities (OEO) and Title IX Coordinator, in drafting comprehensive procedures for the reporting, investigation and resolution of reports of sexual and gender-based harassment and violence. The procedures were developed to: provide transparent and consistent information to University constituents; incorporate trauma-informed practices and responses; remove barriers to participation in University processes; provide fair and impartial investigative practices; comply with evolving federal law and guidance; and incorporate lessons learned from participant experiences, recent federal legislation, and national enforcement efforts by the U.S. Department of Education's Office for Civil Rights (OCR).

The Office of Equal Opportunity Procedures, implemented at the start of the 2014-2015 academic year, followed an evolving national model of a single, unified policy and procedures that apply to all University community members, including faculty, staff, students, Board of Trustee members, volunteers, contractors, guests and visitors of the University. Consistent with Title IX and VAWA, the policy extends to all University activities, both on and off-campus, and encompasses all forms of sexual and gender-based harassment, sexual assault, dating violence, domestic violence, stalking, retaliation and related forms of prohibited conduct. The unified Policy and Procedures include centralized, streamlined and consistent messaging about institutional values, purpose, scope, notice of non-discrimination, applicable definitions of prohibited conduct, available resources, reporting options, the difference between confidential resources and reporting options, information about prevention and the prohibition on retaliation.

In the fall of 2014, we conducted our first on-site campus visit, and over the course of the next several months, we continued to consult with University stakeholders to supplement and inform our review of written materials. During the course of our engagement, we shared our preliminary observations and recommendations with the Chancellor, the Title IX Coordinator and General Counsel. We also provided ongoing advice and guidance to the University over the course of the 2014-2015 academic year. The University took immediate steps to implement our preliminary recommendations, including the initiation of a national search for a full-time, dedicated Title IX Coordinator to assume responsibility for the oversight of the University's Title IX compliance and administration of the University's OEO Policy and Procedures. On May 25, 2015, we provided detailed recommendations to the University in a written report.

At the time of our report, the University had already implemented some of the key recommendations. Those included, as described above, the implementation of a uniform policy and procedures (Fall 2014) and the hiring of a dedicated Title IX Coordinator (Spring 2015). The University also expanded staffing in the Office of Equal Opportunity to enable the University to fulfill its commitment to prompt and equitable responses to reports of sexual and gender-based harassment and violence (Spring 2015) and made Title IX training for all University employees mandatory (Spring 2015).

Since May 2015, the University has continued to make steady progress in implementing many of our recommendations. Because a number of those recommendations

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address structure and systems, as well as expansion of education and training programs, we expect that the University will continue efforts to implement the recommendations over this academic year. Many of the recommendations were necessarily dependent on the arrival of Jean McAllister, who began employment as the dedicated Title IX Coordinator on June 1, 2015. Implementing the recommendations, which are expansive in scope, requires a dedicated commitment of time, energy, efforts and resources, and cannot be achieved overnight. The recommendations go beyond compliance and seek to incorporate effective and promising practices. The implementation of the recommendations requires a coordinated approach to teamwork, building upon the existing administrative foundation, and in some instances, shifting aspects of University culture and climate that are rooted, as in many institutions, to past practices and policies.

In our report, we recommended that the University dedicate immediate attention to the following initiatives: 1) review the structure of the institutional response under the newly hired Title IX Coordinator, 2) develop a coordinated multi-disciplinary response team, 3) expand resources for support and advocacy, and 4) conduct strategic planning to meet comprehensive training needs for all constituencies.

We are pleased to share this addendum as an update to the University's efforts. First, the Chancellor, in consultation with the Title IX Coordinator, has chosen to share our full report with the University community. Recognizing that achieving the goals of Title IX is a community-wide effort, providing open and transparent information about this assessment will assist interested community members in understanding more about the challenges of developing effective institutional responses. It may also serve to foster trust and reinforce confidence in the University's commitment to respond compassionately, promptly and equitably to eliminate sexual and gender-based harassment and violence, prevent its recurrence, and address its effects on affected community members and the University community as a whole.

Second, campus administrators responsible for administering components of the University's Title IX response, including CAPE, the HCC, Campus Safety, Campus Life, Student Conduct and Graduate Studies, have continued to work collaboratively to enhance and expand available resources and prevention education efforts. Campus administrators have also updated University policies and procedures as part of a review of the implementation of the 2014-2015 policy. Additionally, student leaders, through Student Government and the Student Coalition to Eradicate Sexual Assault, have initiated changes in requirements for leaders in all student organizations across campus and continue to develop and carry out educational campaigns that address gender-based violence and focus on culture change.

Finally, the Title IX Coordinator, in consultation and team work with many campus administrators and students concerned about sexual violence on campus, has already implemented or made progress on many of our recommendations. Because the list of recommendations is expansive, we have included a chart summarizing our recommendations and any actions taken by the University in response to those recommendations.

Although not an exhaustive list, key accomplishments in each of the functional areas of our recommendations include:

Policy and Procedures

- Solicitation of input from community stakeholders to identify community feedback and recommendations regarding the 2014-2015 OEO Policy and Procedures.
- Revision of the 2014-2015 OEO Procedures to incorporate evolving regulatory guidance, University experiences implementing the 2014-2015 Procedures, and promising practices based on lessons learned from the national context.
- Provision of supplemental resources, including resource handouts for students and employees that outline on and off-campus resources and flow charts that illustrate University procedures.

Dedicated Title IX Coordinator

- Appointment of a full-time, dedicated Title IX Coordinator with attention to the provision of resources and a more focused portfolio.
- A shift in the reporting structure of the Title IX Coordinator so that the Title IX Coordinator now reports to the Vice Chancellor of Human Resources rather than the Director of the Equal Opportunity Office.
- Restructuring of intake, referral and review processes to ensure that the Title IX Coordinator has effective oversight over all aspects of an effective Title IX response.
- Additional consultation with Pepper Hamilton about the development of the University's Title IX responses and implementation of these recommendations.

Multi-disciplinary Team for Coordination of Information and Tasks

- Creation of a Gender Violence Threat Assessment Team to provide a coordinated multi-disciplinary response, under the leadership of the Title IX Coordinator, to reports of sexual or gender-based harassment or violence that threaten campus safety.
- Referral of all reports to a consistent review process to assess the appropriate steps to eliminate, prevent and address the underlying misconduct, and assure

a prompt and equitable review and resolution that incorporates the wishes of the complainant and the University's broader obligation to campus safety.

- Establishment of a weekly meeting schedule for the core Title IX implementers to review active cases, and a planned periodic meeting schedule for the broader Title IX implementing team to assess progress with recommendations, evaluate available supports, assess patterns and coordinate educational and programming efforts.
- Utilization of the newly developed Gender Equity Task Force to continue interdisciplinary planning and response.
- Review and development of template communications and correspondence.
- Enhanced systems for documentation of reports and steps taken to eliminate, prevent and address the effects of the prohibited conduct.
- Participation in the Denver Metro Area Sexual Assault Interagency Council Title IX Working Group to develop working relationships with local educational institutions, law enforcement and prosecuting authorities.

Routine Actions upon Receipt of a Report

- Selection of a uniform file management system with interdepartmental access to maintain comprehensive records, document investigative steps, interim measures and communications, track timelines and facilitate regular and ongoing communication.
- Revision of the internal process for reviewing all Title IX reports to allow the Title IX Coordinator to screen and assess referrals and conduct an initial assessment of all reports through informational meetings with complainants and respondents and, when appropriate, assessment by the Gender Violence Threat Assessment Team.
- Oversight of alternative resolution by the Title IX Coordinator to ensure consistent documentation and tracking of effectiveness of actions taken to eliminate sexual and gender-based harassment and violence, prevent its recurrence and address its effects on the complainant and the community.
- Institution of practice of weekly contact with complainants and respondents during the investigative processes.

Resources for Support and Advocacy

- Expanded staffing in the Center for Advocacy, Prevention and Empowerment (CAPE) to include an additional half-time advocate as of August 2015.
- Assumption by Title IX Coordinator of oversight and responsibility for interim measures.
- Separation of support and advocacy functions from investigative and adjudicative functions.

Oversight of Student Organizations

- Hiring an Assistant Director of Student Activities, Lauren Utley, to assist the Director with oversight of fraternities and sororities.
- Coordination with student life staff responsible for fraternities and sororities to assess need and plan for voluntary training initiatives.

Education, Prevention and Training

- Mandated training programs for all employees as of May 2015.
- Designation of the Title IX Coordinator as the administrator with oversight responsibility for coordination and vetting of all University training and educational programming under Title IX, Clery and VAWA.
- Regular coordination between Title IX Coordinator, the CAPE Program Director and the Campus Safety Reporting and Compliance Officer to prioritize training needs by constituency and content and ensure a coordinated approach to education and training.
- Introduction of Peer Educators through CAPE.
- Planning is underway to separate prevention education from victim services and move comprehensive prevention training under the Title IX Office.

Campaign and Core Messaging

- Support of efforts by the Student Coalition to Eradicate Sexual Assaults to create a poster campaign.
- Initiation of targeted training for students, faculty and staff in areas identified through referral or anonymous reports to initiate culture change.
- Collaboration with a campus-wide coalition to plan sexual assault awareness month speakers and the sexual assault summit.

Climate Assessment

- Completion of a University-wide climate survey.

We expect that the University's efforts will be ongoing. We commend the commitment of the Chancellor, senior leadership, the Title IX Coordinator and campus stakeholders for their engagement in this assessment and continued efforts to assure that University policies, procedures and practices are effective and legally compliant.

Sincerely,



Gina Maisto Smith



Leslie M. Gomez

Appendix A
Chart of University Efforts Taken in Response to Pepper Hamilton Recommendations

Policy and Procedures	Action Taken
<p>1. During the summer of 2015, in preparation for conclusion of the OCR investigation, review the current Discrimination/Equal Opportunity Policy and Equal Opportunity Procedures in light of: the October 14 VAWA Rules, which are implementable in July 2015; common elements of OCR resolution agreements released since the fall of 2014; and, the experiences of DU investigators, adjudicators and implementers.</p>	<p>The Office of Equal Opportunity Procedures for the 2015-2016 academic year was revised with an effective date of August 17, 2015.</p> <p>Key revisions include:</p> <p>Revision of investigative procedures to include time frames for each component of the investigation to ensure that investigations will be completed in a prompt and fair manner, without compromising the opportunity of all individuals to be heard.</p> <p>The Title IX Coordinator has been removed from the appeal process to eliminate any potential conflict of interest.</p> <p>The appeals process for students and staff has been revised to provide both complainant and respondent with the same right of appeal to the Provost, Vice Chancellor or designee.</p> <p>The University has revised the retaliation definition to include a more expansive and accessible framing of potential forms of retaliation.</p>
<p>2. Consider contacting complainants and respondents who intersected with the Equal Opportunity Office or the University's Title IX processes during 2014-2015 to provide them a voluntary opportunity to share any feedback,</p>	<p>This summer, the Title IX Coordinator solicited input from the campus community to identify potential revisions to policy. The Title IX Coordinator met with</p>

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<p>concerns or other relevant information about their experience.</p>	<p>stakeholders individually and in an interdisciplinary meeting.</p>
<p>3. Commit to conducting an annual review and assessment of Title IX policies, procedures, and practices to reflect and incorporate lessons learned from the current year and evolving law and guidance.</p>	<p>The Title IX Coordinator has committed to an annual review based on experience, feedback and evolving legislation and guidance, which will take place during the late summer each year.</p> <p>The Title IX Coordinator has also been working with Professor Anne DePrince, a nationally recognized trauma researcher, to develop evaluation tools to measure the effectiveness of the University's Title IX responses.</p>
<p>4. Supplement the Discrimination/Equal Opportunity Policy and Equal Opportunity Procedures policy with additional resources (a revised resource and response overview (resource page), a Frequently Asked Questions (FAQ) document, and flow charts).</p>	<p>The University has developed and revised separate resources handouts for students and for employees outlining on- and off-campus resources. The handouts are reviewed with a complainant and respondent at every informational meeting.</p> <p>The University has also developed a flow chart that is provided at informational meetings with complainant and respondents.</p> <p>The University is planning to develop a brochure with simple, clear information about key components of policy and procedures and simple information about resources (slated for completion January 2016).</p>
<p>5. Determine whether there are any remaining policies, procedures, pamphlets, sections in handbooks, brochures, or web content that should be removed or revised to maintain consistency</p>	<p>The University is currently reviewing the intersection between complaints of discrimination arising out of the application of the OEO Procedures</p>

<p>with the Discrimination/Equal Opportunity Policy and Equal Opportunity Procedures.</p>	<p>and the University’s discrimination policy.</p> <p>The University completed a website analysis in November 2015 to identify web pages with conflicting or inaccurate information about Title IX and Equal Opportunity policies and procedures.</p> <p>The Title IX Coordinator met with the CAPE Director and Campus Safety Officer to develop consistent messaging on reporting obligations, and clarity about confidential resources and reporting options.</p> <p>Web pages will be complete with consistent messaging in January 2016.</p>
<p>Dedicated Title IX Coordinator</p>	<p>Action Taken</p>
<p>1. Hire a full-time, dedicated Title IX Coordinator.</p>	<p>On June 1, 2015, Jean McAllister began employment as a full-time and dedicated Title IX Coordinator.</p>
<p>2. Ensure that the Title IX Coordinator has autonomy and control over key aspects of an effective Title IX response, including: central review of all reports of sexual and gender-based harassment and violence; participation in the evaluation of reports where a complainant requests anonymity or that no investigation occur; the provision of interim measures; timeliness of the investigative and adjudicative processes; and, the provision of individual and community remedies designed to eliminate a hostile environment, prevent its recurrence and address its effects.</p>	<p>The reporting structure for the Title IX Coordinator has been revised as of July 1, 2015. The Title IX Coordinator now reports to the Vice Chancellor of Human Resources.</p> <p>The University has restructured the internal process for reviewing all Title IX reports, including anonymous reports. The Title IX Coordinator screens referrals and conducts informational meetings with complainants and respondents and maintains consistent documentation of all meetings and decisions. The Title IX Coordinator also reviews all</p>

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	investigative reports prior to their release to the parties.
3. Provide appropriate resources to support the Title IX Coordinator in her functioning.	The University has hired two full-time investigators with prior experience and training.
4. Consider designating University employees as Deputy Title IX Coordinators.	The University is in the process of evaluating the need for, possible timing of, and appropriate designation and functioning of Deputy Title IX Coordinators.
5. Consultants to spend a day with the Title IX Coordinator to share insights from this review and provide guidance and advice about the development of her role and implementation of these recommendations.	On September 24, 2015, Ms. Gomez and Ms. Smith met with Ms. McAllister during an on-campus visit to review the report and address further implementation of the recommendations.
Multi-disciplinary Team for Coordination of Information and Tasks	Action Taken
1. Reinforce a centralized review process by ensuring that all reports regarding sexual and gender-based harassment and violence, dating violence, domestic violence and stalking are referred to a consistent review process under the oversight of the Title IX Coordinator. Each report known to the University should be referred to the Title IX Coordinator and supporting multi-disciplinary team (Title IX Office) to assess the appropriate steps to eliminate, prevent and address the underlying misconduct, and assure a prompt and equitable review and resolution that incorporates the wishes of the complainant and the University's broader obligation to campus safety.	<p>The Title IX Coordinator and other campus administrators have been providing consultation and training to campus partners, including Campus Safety, Campus Life, Pioneers Care, Housing and Residential Life to ensure that they each understand their responsibility to provide any reports to the Title IX Coordinator.</p> <p>The University has restructured the internal process for reviewing all Title IX reports, including anonymous reports. The Title IX Coordinator screens referrals and conducts informational meetings with complainants and respondents and maintains consistent documentation of all meetings and decisions.</p>

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<p>2. Identify a coordinated multi-disciplinary response team (Title IX Office) to provide support, resources and accommodations, to facilitate and document informed decision-making, and to integrate compliance requirements.</p>	<p>The Title IX Coordinator and the OEO meet weekly to review all active cases. The University General Counsel attends team meetings regularly to provide legal advice and answer questions.</p>
<p>3. Establish a routine meeting schedule (weekly or more frequently as needed) for the core Title IX response team to review active cases, and the broader Title IX implementing team should meet periodically to assess progress with recommendations, evaluate available supports, assess patterns and coordinate educational and programming efforts.</p>	<p>The Title IX Coordinator is adapting the ongoing Gender Equity Task Force to continue interdisciplinary planning and response. The first meeting is scheduled for January 2016.</p>
<p>4. Develop internal operating protocols for the Title IX team that funnel all information to a centralized multidisciplinary team for coordinated and consistent assessment, map the internal operating procedures and process workflow, build mechanisms for timely sharing of information, and outline the available institutional steps that may be taken following a report.</p>	
<p>5. Develop consistent protocols for application to critical decisions that identify who has the responsibility for making a determination, outline the applicable law and guidance, establish a list of key factors to consider, and maintain appropriate documentation of the factual foundation for each decision</p>	
<p>6. Review and standardize existing template communications for regular stages of the process to assure consistency, the use of trauma-informed language, adherence to policy requirements and compliance with federal law regarding required written communications.</p>	<p>The University has developed template notices and reports for consistent language and responses, including respectful and compassionate tone. These template forms are currently being reviewed for consistency and regular use.</p>
<p>7. Maintain appropriate documentation and records of all reports and steps taken to eliminate, prevent and address the effects of the prohibited conduct.</p>	<p>The Title IX Coordinator has taken steps to facilitate consistent documentation.</p>

	The University has purchased Time Matters software which will allow central record keeping in a single location, with case management and reporting capacities. The use of this software will enhance the ability of the University to assess the consistency and effectiveness of Title IX responses.
8. Coordinate with law enforcement. We recommend that the University meet with local law enforcement and prosecuting authorities to review and update any memorandum of understanding.	The Title IX Coordinator attends and represents the University at the Denver Metro Area Sexual Assault Interagency Council Title IX Working group to develop protocols and working relationships with other Title IX and campus sexual assault programs and with law enforcement and prosecutors in Denver.
9. Build in a process for feedback with involved employees and implementers to demonstrate follow-through and enhance trust in the process by increasing transparency.	Plans are in place to begin quarterly reports on Title IX matters to the campus community in 2016. The data will include number and types of reports, alternative resolutions, investigations and outcomes presented without personally-identifiable information.
Routine Actions upon Receipt of a Report	Action Taken
1. Systemize case management. We recommend that the University develop structured protocols and systems for case management that maintain comprehensive records, document investigative steps, interim measures and communications, track timelines and facilitate regular and ongoing communication.	The University is implementing a uniform file management system (Time Matters) for use by OEO/Title IX, Risk Management, Legal Affairs, and Employee Relations.
2. Conduct an initial assessment (consistent with the OEO Procedures) in every case and ensure contemporaneous documentation of steps taken and information considered. The initial review should proceed to the point where a reasonable	Revision of the internal process for reviewing all Title IX reports to allow the Title IX Coordinator to screen and assess referrals, to conduct an initial assessment of all

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<p>assessment of the safety of the individual and of the campus community can be made, and the Title IX Coordinator and/or Title IX team has sufficient information to determine the best course of action, which may include an investigation or steps to otherwise determine what occurred.</p>	<p>reports, to make outreach to complainants when the complainant is not the reporting party, to hold informational meetings with complainants and respondents, and as needed, to assess reports with the assistance of the Gender Violence Threat Assessment Team.</p>
<p>3. As part of the initial assessment, and consistent with the OEO Procedures, develop a systemized process for evaluating a complainant’s request for anonymity, determining the appropriate course of action, and documenting the facts and circumstances that inform the University’s determination. This process, which must be supportive of a complainant’s needs and iterative in nature, can involve the Title IX Coordinator, the Title IX core response team, or a separate entity specially designated to assist or evaluate a request for anonymity. The Title IX Coordinator should document the information gathered, the factors considered, the determination reached, and any additional steps taken to eliminate, prevent and address the effects of the misconduct.</p>	<p>The Title IX core team (the Title IX Office) reviews every report and initial assessment completed by the Title IX Coordinator, including those with requests for anonymity. This review includes the Investigators, Employee Relations, the Vice Chancellor of Human Resources and General Counsel. In some cases, the CAPE Director or Campus Safety are consulted.</p> <p>The University is utilizing a Gender Violence Threat Assessment Team which includes personnel from OEO/Title IX, HCC/CAPE, Campus Safety, Student Conduct, Graduate Studies, Pioneers Care, General Counsel and other identified administrators to assemble as needed to conduct risk assessment and address safety issues.</p>
<p>4. Consistent with the OEO Procedures, ensure that all forms of alternative resolution are clearly documented to demonstrate the actions that are taken to meet the University’s Title IX obligation to take action to eliminate a hostile environment, prevent its recurrence and address its effects on the complainant and the community.</p>	<p>The Title IX Coordinator has assumed the responsibility for implementing all forms of alternative resolution, documenting the process, and evaluating the effectiveness and impact of the resolution.</p>
<p>5. Maintain regular and consistent communications with the parties. Ensure that processes are in place to comply with the VAWA requirement that any extension of designated time frames is for good cause, and that the delay and the reason for</p>	<p>The Title IX Coordinator has set an expectation that investigators and/or the Title IX Coordinator will maintain consistent and regular contact with the parties in any</p>

<p>the delay are provided in writing to the complainant and respondent.</p>	<p>investigation on at least a weekly basis, unless otherwise requested by the parties.</p> <p>The OEO Procedures have been revised to include the provision that any extensions requested by the parties must be requested in writing and must be approved by the Title IX Coordinator.</p> <p>If extensions for other reasons are taken (such as cooperation with a law enforcement initial investigation), documentation is made in the file and impacted parties are notified.</p>
<p>Resources for Support and Advocacy</p>	<p>Action Taken</p>
<p>1. Conduct a benchmark study/gap analysis to determine whether the current functioning of HCC and CAPE provide adequate staffing levels to meet the needs imposed by the size and diversity of the University population.</p>	<p>HCC and CAPE have determined that an additional half time advocate is needed to meet existing needs in 2016. The request for this additional staffing was included in the 2016 budget request.</p> <p>Title IX and campus partners have determined that a confidential resource for respondent support, similar to that provided to complainants through the CAPE advocacy and support program, should be created to give adequate support to respondents during the investigative and adjudicative process. The University is currently assessing options for funding such a position, initially at half-time given the current number of respondents involved in the process (which is typically lower than the total number</p>

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	of reports and complainants seeking support).
2. Examine the existing campus resources to ensure that appropriate services are available to campus community members on an emergency and ongoing basis and to identify any gaps in services.	<p>The University has revised the list of available campus and community resources available to prospective or active complainants and respondents, both for students and for employees.</p> <p>The University has placed an increased emphasis on the difference between confidential resources and reporting options, and provided clarity about the difference between privacy and confidentiality.</p>
3. Expand the staffing of CAPE to allow for ease of access during working and non-working hours, expanded direct advocacy services, and expanded education and prevention programming.	<p>CAPE has hired an additional half-time advocate (August 2015). Confidential advocates are available on an on-call basis for after-hours' response.</p>
4. Provide a clear and routine pathway for evaluating and imposing reasonably available interim measures in order to facilitate more consistent and streamlined access to interim remedies and protective measures.	<p>The Title IX Coordinator has assumed the responsibility for assessing and determining the appropriateness of reasonably available interim measures, documenting the process, and evaluating the effectiveness and impact of the interim measures. Where an interim protective measure may be appropriate because the nature of the reported conduct impacts the safety of the campus, (e.g., interim suspension, etc.), the Title IX Coordinator will convene the Gender Violence Threat Assessment Team to assist with the determination.</p>
5. To ensure the integrity of the investigation, the responsibility for implementing support services and interim measures should be managed by an	<p>The Title IX intake process has been restructured to separate intake from investigation. The Title IX</p>

<p>individual who is not directly involved in the investigation of an allegation.</p>	<p>Coordinator meets with the parties to provide information about rights and resources, leaving the investigators to conduct investigations and make findings.</p>
<p>Oversight of Student Organizations</p>	<p>Action Taken</p>
<p>1. Institute mandatory training and education requirements for all fraternity and sorority members, and engage fraternity and sorority leaders as peer educators within the Greek system.</p>	<p>The Title IX Coordinator has met with student life staff responsible for fraternities and sororities, and plans to meet with the Greek Council.</p> <p>The University also plans to implement voluntary training.</p>
<p>2. Review the University’s formal relationship with student organizations to assure that the University has the capacity to discipline, to take other remedial action, and to mandate appropriate training and educational programming.</p>	
<p>3. Consider reevaluating the process for formal recognition by the University</p>	
<p>4. Consider restructuring the advisor system of oversight.</p>	
<p>5. Evaluate rules regarding social events, parties and the use and dissemination of alcohol.</p>	
<p>Education, Prevention and Training</p>	<p>Action Taken</p>
<p>1. Designate one individual with oversight responsibility for coordination and vetting of all University training and educational programming related to and required by Title IX, Clery and VAWA;</p>	<p>The University has designated the Title IX Coordinator to be responsible for oversight of training and prevention efforts.</p> <p>Planning is underway to separate prevention education from victim services and move comprehensive prevention training under the Title IX Office.</p>
<p>2. Categorize all constituencies (students and employees) by identity groups and departments to prioritize training needs and assign/delegate</p>	<p>The Title IX Coordinator is meeting regularly with the CAPE Director and Campus Safety Assistant</p>

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<p>responsibility for meeting those training needs in a coordinated and timely manner.</p>	<p>Director of Compliance and Administration to identify training needs and plan delivery of training.</p>
<p>3. Prioritize training for the senior leadership team and supervisors.</p>	<p>The Title IX Coordinator provided training for Administrative Council (all Deans and Vice Chancellors) and for Faculty Senate in October 2015.</p>
<p>4. Prioritize training for specific individual groups, including: athletes, fraternities and sororities, international students, and graduate students.</p>	<p>The University is planning required training for all graduate students, residential life staff (RDs and RAs) and select graduate student and employee groups.</p>
<p>5. Ensure that all education and training materials are clearly written and reflect consistency with current law, guidance, policy, trauma-informed practices and fair and impartial processes.</p>	<p>Through ongoing meetings and discussion, the CAPE Director, the Assistant Director of Compliance and Administration for Campus Safety and the Title IX Coordinator are working to ensure this consistency.</p>
<p>6. Consider creating an Education and Prevention Committee to ensure coordinated approach to education and training.</p>	<p>It is expected that the campus-wide Gender Equity Task Force will undertake broader planning for prevention education and training efforts.</p>
<p>7. Consider multi-disciplinary programming to address issues of sexual violence, gender equity, tolerance, inclusion and diversity, alcohol and substance abuse, intimacy, consent, the “hook up” culture, social media, bullying, hazing, classism, racism, and other issues that can impact campus culture and the development and education of students.</p>	<p>CAPE, Health Promotion, Marketing and Communications, Undergraduate Student Government, Campus Safety and Title IX are planning a collaborative training and social marketing bystander intervention program for alcohol, sexual assault, and crime prevention to roll out in Winter 2016.</p>
<p>8. Incorporate VAWA requirements to provide programming for students and employees</p>	<p>Title IX training and the CAPE B.O.S.S. training have both</p>

<p>addressing the issues of domestic violence, dating violence, sexual assault and stalking.</p>	<p>incorporated information on all forms of gender-based violence and harassment, including dating or domestic violence, stalking and sexual assault.</p>
<p>9. Provide integrated training to all employees, including tenure track professors and adjunct professors, which addresses reporting responsibilities for campus employees re: Clery (CSA), Title IX (Responsible Employee), mandatory child abuse reporting, and Colorado state law.</p>	<p>All employees, including tenured and adjunct professors, are required to take the on-line Title IX training outlining University non-discrimination policies, prohibited behaviors, Title IX reporting requirements and an overview of the process for resolution of concerns. The University has also been providing training to campus partners, including Campus Safety, Campus Life, Pioneers Care, Housing and Residential Life and others to ensure that they each understand their responsibility to provide any reports to the Title IX Coordinator.</p>
<p>10. Provide dedicated training for faculty members, which should be incorporated through dedicated, in-person trainings that seek to reinforce centralized reporting.</p>	<p>The Faculty Senate was trained in October 2015. The Title IX Coordinator is working with individual graduate schools and undergraduate programs to provide training to faculty and staff, including graduate research and teaching assistants.</p>
<p>11. Review existing training programs to assure that they encompass the expanded scope of content under the Title IX Q & A and VAWA.</p>	<p>The University has placed an increased focus on outreach and education through mandatory online training for employees (pursuant to the new requirements of VAWA), creation of new department literature/media about the investigative process, and in-person outreach at campus events.</p>

<p>12. Consider the use of potent tie-ins to accomplish training goals (contractual, by merit increase, by evaluation, by computer log-ins, or meeting professional standards or curriculum requirements).</p>	<p>As of late May 2015, all employees are required to take on-line training.</p>
<p>13. Develop a campaign to reflect DU's core messaging and values.</p>	<p>This will begin with the release of this Addendum and the Report in Winter 2016.</p>
<p>14. Consider using student leaders and developing paid peer educator positions.</p>	<p>CAPE has hired 7 student Peer Educators.</p> <p>Student leaders carried out a poster campaign to increase awareness of gender-based violence, resources and reporting options and generate compassionate support for victim-survivors in Fall 2015.</p> <p>The Undergraduate Student Government passed an initiative in Fall 2015 requiring all leaders of student organizations to complete the B.O.S.S. training. This training was completed in October 2015.</p>
<p>Campaign and Core Messaging</p>	<p>Action Taken</p>
<p>1. Collaborate with the University's Communications Department to develop an intentional and strategic plan, identify branding, design visual content, and consider the effectiveness of forms of delivery, including web content, written materials, posters and other formats.</p>	<p>The University is in the process of conducting campus-wide meetings to develop core messaging. The Title IX Coordinator and the CAPE Director have supported the Student Coalition to Eradicate Sexual Assault in the creation of the poster campaign referenced above.</p>
<p>2. Coordinate the prevention, education and training programs through the lens of a coordinated and impactful campaign that provides consistent messaging designed to shift culture and climate.</p>	<p>CAPE, Health Promotion, Marketing and Communications, Undergraduate Student Government, Campus Safety and Title IX are planning a collaborative training and social marketing bystander intervention</p>

	program for alcohol, sexual assault, and crime prevention to roll out in Winter 2016.
3. Develop a calendar to maintain steady and periodic programming.	
4. Identify community members who are responsible for resourcing and presenting regular training, as vetted by Title IX Coordinator.	
5. Consider incorporating core elements in all training and educational programs for students, staff and faculty.	Currently, all training incorporates core values identified in the University Non-Discrimination Policy and information about consent, prohibited conduct, bystander intervention, reporting requirements and campus resources.
Climate Assessment	Action Taken
1. Consider conducting a climate assessment that seeks to identify challenges in the current campus climate that affect the educational or employment environment or creates barriers to reporting. This may include: an assessment of the campus climate, an evaluation of the role of alcohol or other drugs on campus and the efficacy of existing alcohol policies; and, an assessment of any areas of risk for students. A canvassing of all campus community members through a variety of methods – online and in-person, both anonymous and in open forums – serves a critical role in identifying key issues, assessing campus climate as reflected in recent OCR guidance, identifying educational and training needs for all constituencies and ultimately, eliminating a hostile environment based on a greater understanding of the context. It also demonstrates the University’s commitment to addressing issues of sexual violence directly and openly.	<p>The University has conducted a climate assessment, and is in the process of analyzing the data and making recommendations based on the information learned.</p> <p>Results will be released in Winter Quarter 2016.</p> <p>Open forum meetings will be incorporated into sexual assault awareness month activities.</p> <p>A second climate survey will be conducted late winter or early spring 2016.</p>
2. Study options for more formalized future surveys addressing prevalence.	

Other Recommendations	
Investigation	Action Taken
<p>1. Conduct a review of Title IX files regarding informal and formal reports received during the 2014-2015 academic year to ensure that appropriate steps were taken in each report, including an initial assessment, evaluation of request for anonymity, the provision of interim and protective measures, alternative resolution or investigation, and Outcomes Council. Review these files for completeness of the investigations, timeliness and implementation of appropriate remedies (both individual and campus-wide).</p>	
Outcomes Council	Action Taken
<p>1. Consider placing the Outcomes Council under the direct supervision of the OEO or other appropriate office.</p>	
Incorporate Student Feedback and Involvement	Action Taken
<p>1. Continue to seek mechanisms to incorporate student input through student leaders, open forums and individual engagement.</p>	
Clery Audit	Action Taken
<p>1. Consider an audit of policies, procedures and practices under the Clery Act.</p>	