

Houghton College Policy on Sex-Based Discrimination, Sexual Harassment, Sexual or Relationship Violence and Stalking

(rev. August, 2018)

I. Policy Statement

A. Introduction

As a Christian learning community in the Wesleyan tradition, we pursue academic achievement, personal development and spiritual growth. We seek to create an educational environment that integrates faith, learning and living in a way that honors Christ, follows biblical principles, builds loving relationships, and develops whole Christians who will be active in serving Christ. To become this kind of community, it is essential that we share a set of values, convictions and commitments that guide our life together. The following document outlines protocols and procedures for the prevention of and response to violations involving sex-based discrimination, including sexual harassment, nonconsensual sexual misconduct, stalking and relationship violence. Please note that in addition to policies forbidding sexual harassment and sexual and relationship violence, the *Houghton College Statement of Community Responsibilities* holds all community members to standards of behavior based on the understanding that, in God's design, a relationship of lifelong commitment in marriage between a man and a woman is the appropriate context for full sexual expression.

B. Statement of Nondiscrimination

Houghton College is committed to providing a learning, working and living environment that is free from discrimination on the basis of sex, which includes all forms of sexual harassment and sexual violence. Therefore, acts of sexual harassment, stalking, relationship violence and non-consensual sexual misconduct are not tolerated in our community. Houghton College has additional policies regarding consensual sexual misconduct; please refer to the Student Guide and/or the Staff Handbook for policies and expectations. Title IX of the Education Amendments of 1972 (Title IX), which prohibits discrimination based on sex in educational programs and activities that receive federal financial assistance, reads as follows: "No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any education program or any activity receiving Federal financial assistance. . ." (*Title IX of the Education Amendments of 1972, codified at 20 U.S.C. section 1681, and its implementing regulation at 34 C.F.R. Part 106*). Under Title IX, discrimination on the basis of sex can include sexual harassment; unwelcome sexual advances; or sexual violence, such as rape, sexual assault, sexual battery and sexual coercion. The Campus SaVE Act, federal legislation enacted in 2013, adds domestic violence, dating violence and stalking as categories of behavior that are expressly in violation of Title IX. Houghton College is committed to keeping our community free of such conduct through education, training, clear policies and procedures, and appropriate consequences for those who violate this policy. When an instance of sexual discrimination is reported, the College will take action to promptly and equitably investigate the complaint, address its effects and prevent further discrimination or retaliation.

C. Title IX Coordinator/Sexual Harassment Officer and Deputy Coordinators

The College has, in accordance with Title IX, appointed a Title IX Coordinator who serves as the HC Sexual Harassment Officer and a team of Deputy Coordinators who assist the Title IX Coordinator. The College's Title IX Coordinator is the individual designated by the College President with responsibility

for carrying out the College's responsibilities under Title IX, including receiving reports of alleged violations of Title IX, overseeing the College's response to Title IX complaints, and identifying and addressing recurring or systemic violations. The Coordinator has knowledge of the requirements of Title IX and the College's related policies and procedures. The Coordinator oversees compliance with all aspects of Title IX, including reviewing the College's disciplinary procedures to ensure a prompt and equitable adjudication of complaints, and coordinating education and training programs for all Houghton College constituents. In addition, the Title IX Coordinator evaluates a complainant's request for confidentiality and oversees regular climate assessments related to Title IX.

Questions related to this policy may be directed to Ms. Nancy Louk Murphy at 403 Chamberlain Center, or by calling (585) 567-9454 (x4540 on campus).

Please refer to the Houghton College [Title IX website](#) for additional information.

Title IX Deputy Coordinators

The following employees are designated as Deputy Title IX Coordinators and have responsibility for working with the Title IX Coordinator to ensure that the Houghton College community is sufficiently educated and trained in matters of the prevention of and response to all violations related to sex discrimination.

- Vice President for Student Life (585.567.9220)
- Dean of Students (585.567.9220)
- Director of Human Resources (585.567.9321)
- Athletics Department Senior Women's Administrator (585.567.9450)

II. Definitions & General Information

Affirmative Consent

Affirmative consent is a clear, unambiguous, knowing, informed, and voluntary agreement between all participants to engage in sexual activity. Consent is active, not passive. Silence or lack of resistance cannot be interpreted as consent. Seeking and having consent accepted is the responsibility of the person initiating each specific sexual act regardless of whether the person initiating the act is under the influence of drugs and/or alcohol. Consent to any sexual act or prior consensual sexual activity between or with any party does not constitute consent to any other sexual act. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity or gender expression. Consent may be initially given but withdrawn at any time. When consent is withdrawn or cannot be given, sexual activity must stop. Consent cannot be given when a person is incapacitated. Incapacitation occurs when an individual lacks the ability to fully, knowingly choose to participate in sexual activity. Incapacitation includes impairment due to drugs or alcohol (whether such use is voluntary or involuntary), the lack of consciousness or being asleep, being involuntarily restrained, if any of the parties are under the age of 17, or if an individual otherwise cannot consent. Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.

Amnesty

The health and safety of every Houghton College student is of utmost importance. The College administration recognizes that students who have been drinking or engaging in consensual sexual behavior at the time of an incident of sexual violence may be hesitant to report the incident for fear of the potential consequences for their own conduct. Students are strongly encouraged to report incidents of sexual violence to campus officials. A bystander reporting in good faith or a survivor reporting

nonconsensual sexual misconduct to Houghton College officials or law enforcement will not be subject to campus conduct action for violations of relevant policies occurring at the time of the sexual violence.

Bystander

An individual who witnesses or learns of violence or impending sexual or relationship violence, but who is not directly impacted as a survivor of the violence.

Clery Report

In fulfillment of the Clery Act Annual Security Report, Houghton College reports specific crimes in an anonymized manner that neither identifies the specifics of the crime or the identity of the survivor. In addition, Houghton College is obligated to issue timely warnings of Clery Act crimes occurring within a relevant geography that represent a serious or continuing threat to students and employees (subject to exceptions when the warning may potentially compromise law enforcement efforts and when the warning could potentially identify the survivor).

Climate Survey

Semi-annual survey to determine the level of students' awareness of policies and procedures related to conduct code violations involving sexual and relationship violence and stalking; incidence rates for these violations; and perceptions of the institutional follow-up and support when violations are reported.

Complainant

A complainant is any person who is alleged to be the victim of sex-based discrimination including but not limited to any act of sexual violence or harassment. May also be referred to as a reporting individual.

Confidential Resources

Complainants and bystanders may access confidential resources for support and/or for information in decision-making in the aftermath of an experience of sexual violence, stalking or relationship violence. These professionals and victims' advocates are trained to help a survivor understand the importance of follow-up care, including possible medical and legal follow-up in addition to emotional support. Individuals who are confidential resources will not report violations to law enforcement or to college officials without the complainant's written permission, except when exceptions to confidentiality are required by law.

ON CAMPUS:

- Counseling Services (Business hours: 585.567.9622)
- Counseling Services after hours hotline (cell: 585-567-9278) or ext. 2780 on campus
- Health Center (Business hours: 585.567.9484)
- Dean of the Chapel (Business hours: 585.567.9228)

OFF CAMPUS:

- Cattaraugus Community Action Office of Victims' Services (toll free 1-888-945-3970) Local Office: 85 N. Main Street, Wellsville, NY (585-593-4685)
- NY State Hotline for Sexual Assault and Domestic Violence (toll free 1-888-942-6906)
- Local hospitals with Sexual Assault Nurse Examiners: Jones Memorial Hospital, Wellsville, NY (585-593-1100); Olean General Hospital, Olean, NY (716-373-2600)

Criminal and/or Civil Legal Action

Any Houghton College student or employee who is victimized by sex discrimination may pursue criminal and/or civil charges against the respondent concurrent to an on-campus investigation.

False Complaints

Any complainant who knowingly makes false charges alleging violations of this policy will be subject to disciplinary action up to and including termination of employment or dismissal from the College.

Interim Measures

During the investigation and until resolution of the complaint, interim measures may be issued by the Title IX Coordinator or the Coordinator's designee, including but not limited to: restrictions on contact between the complainant and the respondent, bans from areas of campus, and appropriate changes in academic schedules, campus housing or employment schedules. Failure to adhere to the parameters of any interim measure is a violation of policy and may lead to additional disciplinary action.

Investigation of Alleged Violation

If those responsible for investigating violations of this policy, including the Vice-President for Student Life, the Assistant Dean for Residence Life and Programming, the Director of Human Resources and the Title IX Coordinator, become aware that a violation likely occurred, they will begin preliminary fact finding. The complainant will be asked for consent to move forward with the investigation; however, if those responsible for the safety and welfare of the Houghton College community (including the future safety of the complainant) determine that an investigation is required, it shall notify the complainant or reporting individual of this decision and take immediate action as necessary to protect and assist them. Factors that determine whether an investigation is required include whether the accused has a history of violent behavior, the increased risk that the accused will commit additional acts of violence and the use of a weapon or force.

Nonconsensual Sexual Contact

Nonconsensual sexual contact is any intentional sexual touching, however slight, with any object, by a man or a woman upon a man or a woman, without affirmative consent (see *Sexual Violence*).

Protection against Retaliation

All persons are prohibited from taking any action against any other member of the Houghton College community either for alleging discrimination prohibited by Title IX or for cooperating in grievance proceedings related to such allegations, including but not limited to, the complainant, respondent or witness to an alleged incident of sex discrimination. Any person engaging in retaliatory action will be subject to a separate complaint and subsequent disciplinary action up to and including dismissal from the College or termination of employment. (Note: Discipline imposed on a respondent who is found to have engaged in sex-based discrimination under the policy does not constitute retaliation.)

Public Awareness/Advocacy Events and Disclosure of Sex Discrimination

If a person discloses a situation through a public awareness event such as "Take Back the Night," candlelight vigils, or other similar public events, the College is not obligated to begin an investigation (from *Questions and Answers on Title IX and Sexual Violence*, US Department of Education Office of Civil Rights, April 29, 2014). The College may use the information provided to determine the need for additional education and prevention efforts.

Relationship Violence

Relationship violence may refer to dating or domestic violence. Dating violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant. The term *domestic violence* includes behaviors that are used to control another person by a current or

former spouse of the complainant, or by a person with whom the complainant shares a child in common, or by a person who is cohabiting with or has cohabited with the complainant as a spouse, or by a person similarly situated to a spouse of the complainant under the domestic or family violence laws of New York. Ways in which a domestic abuser gains and maintains control can include the following:

- Isolation – making it hard for the victim to see friends and family;
- Economic abuse – having complete control over the money;
- Verbal, emotional, psychological abuse – putting down and embarrassing the victim in front of others, criticizing the partner’s abilities as a partner or parent;
- Intimidation – making the victim afraid with a look, action or gesture;
- Coercion and Threats – threatening to cause harm to the victim or to commit suicide or injure friends or family members;
- Physical Abuse – pushing, grabbing, hitting, slapping, punching, kicking or choking; □ Sexual Abuse – forcing victim to engage in non-consensual sexual behavior;
- Using Children – undermining the victim’s authority as a parent or threatening to take the children away;
- Minimizing, Denying, or Blaming – the full negative impact of the violator’s actions is either minimized, denied outright or blamed on something or someone else.

Respondent

A respondent is any individual who is alleged to have discriminated on the basis of sex as defined in this policy. Prior to an investigation, he/she may be referred to as *the accused*.

Responsible Employees (for incidents of sexual or relationship violence or stalking)

Those persons designated as responsible employees at Houghton College include all staff and faculty who are not bound by professional ethics guaranteeing confidentiality for their clients. Houghton College responsible employees include faculty; staff; Board of Trustee members; administrators; Student Life personnel, including Resident Directors and Resident Assistants; coaches, including student coaches; the Title IX Coordinator and all Deputy Coordinators; and contracted workers such as Metz dining and Sodexo facilities staff.

Houghton College offices and employees who cannot guarantee confidentiality (*see Confidential Resources*) will maintain the privacy of all parties involved to the greatest extent possible. The information provided to a non-confidential resource will be relayed only as necessary for the Title IX Coordinator to investigate and/or seek a resolution.

What should a responsible employee tell a person who discloses an incident of sexual or relationship violence?

A responsible employee should make every effort to communicate the following: the employee’s obligation to report the name of the alleged respondent (accused) and complainant (survivor), as well as relevant facts regarding the incident (including date, time and location); the complainant’s option to request that the Title IX coordinator consider maintaining his/her confidentiality; and the complainant’s ability to share the information confidentially with on-campus resources (Counseling, Health, Dean of Chapel) and/or with off-campus resources (Cattaraugus Community Action, NYS Hotline or area hospital).

What information is a responsible employee obligated to report about an incidence of possible sexual or relationship violence?

A responsible employee will need to share the names of the alleged respondent (if known), the student who experienced the alleged violation, other students who were present, as well as relevant facts including the date, time and location. All inquiries, complaints and investigations are treated with discretion. Houghton College is committed to protecting the privacy of all individuals involved in a report of sexual harassment, stalking, and sexual or relationship violence. All employees who are involved in the College's Title IX response, including the Title IX Coordinator, Deputy Coordinators, investigators and appeal review members, receive specific instructions about respecting and safeguarding private information. Throughout the process, every effort will be made to protect the privacy interests of all individuals involved in a manner consistent with the need for a thorough review of the report.

Requesting Confidentiality during a Title IX Investigation: If a complainant discloses an incident to a responsible employee but wishes to maintain confidentiality or does not consent to the College's request to initiate an investigation, the Title IX Coordinator must weigh this request against the obligation to provide a safe, non-discriminatory environment for all members of the community (see Investigation of Alleged Violation).

Sex-Based Discrimination

Sex-based discrimination is any behavior and/or action that denies or limits a person's ability to benefit from, and/or fully participate in, the educational programs or activities or employment opportunities based on the individual's sex. Examples of sex-based discrimination include sexual harassment; sexual and relationship violence; stalking; absence of equal opportunity in employment, education programs and co-curricular programs, including athletics; and discrimination based on pregnancy.

Sexual Exploitation

Sexual exploitation occurs when an individual takes or attempts to take nonconsensual or abusive sexual advantage of another for his/her own advantage or benefit, or to the benefit or advantage of anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other sexual harassment, stalking or sexual violence offenses.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment or participation in a College-sponsored educational program or activity;
- submission to or rejection of such conduct by an individual is used as the basis for employment or academic decisions affecting such individual; or
- such conduct has the effect of unreasonably interfering with an individual's employment or academic performance or of creating an intimidating, hostile or offensive working or educational environment.

Sexual Violence

Sexual violence refers to physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent (see *Affirmative Consent*). Sexual violence can include a range of behaviors categorized broadly as *Nonconsensual Sexual Conduct* which include, but are not limited to: rape, sexual assault, sexual battery and sexual coercion.

Stalking

According to the U.S. Department of Justice, stalking is a pattern of repeated and unwanted attention, harassment, contact or any other course of conduct directed at a specific person that would cause a reasonable person to feel fear. Stalking can include:

- Repeated, unwanted, intrusive and frightening communications from the violator by phone, mail and/or email;
- Repeatedly leaving or sending victim unwanted items, presents or flowers;
- Following or lying in wait for the victim at places such as home, school, work or recreation place;
- Making direct or indirect threats to harm the victim, the victim's children, relatives, friends or pets;
- Damaging or threatening to damage the victim's property;
- Harassing the victim through electronic means;
- Posting information or spreading rumors about the victim electronically, in a public place or by word of mouth; and
- Obtaining personal information about the victim by accessing public records, using internet search services, hiring private investigators, going through the victim's garbage, following the victim, contacting victim's friends, family, work or neighbors, etc.

Survivor's Bill of Rights

Among the rights afforded to survivors of sexual and relationship violence are the right to receive confidential assistance (see *Confidential Resources*); the right to report the incident to the Title IX Coordinator or other on-campus resource (including, but not limited to, the Vice President for Student Life and the Director of the Office of Safety and Security) and the right to request that an investigation not be carried out or that the complainant remain anonymous. These requests will be considered and decided by the Title IX Coordinator. Additional rights include:

the right to report the incident to the police

the right to a Victim Specialist, available through 888-945-3970

the right to get a medical examination

the right for legal consultation, available through 877-776-4126

the right to request immediate accommodations (see Interim Measures)

the right to be protected from retaliation

the right to expect that this incident will be reported to the Title IX Coordinator and that Houghton

College will uphold its obligations to provide a safe environment.

Transcript Notation

For violations of the Student Guide that involve violence, including sexual violence, in which the student is found responsible (upon investigation and determination), the student may be suspended or expelled from the College. Notation on the transcript in such a case will read, "*suspended after a finding of responsibility for a code of conduct violation*" or "*expelled after a finding of responsibility for a code of conduct violation*".

For the respondent who withdraws from the College while conduct charges are pending, the transcript notation will read, "*withdrew with conduct charges pending*". A student who is suspended may appeal to have the transcript notation removed as early as one year from the conclusion of the suspension, while notations for expulsion will not be removed.

III. Reporting an Incident of Sex-Based Discrimination, Sexual Harassment, Sexual or Relationship Violence or Stalking

A Houghton College student or employee who wishes to report an incident of sex-based discrimination, sexual harassment, sexual or relationship violence or stalking, may choose one or more of the following options:

- Discuss the incident confidentially with Houghton College professionals or off-campus resource persons who by law can maintain confidentiality and can assist in obtaining services (see *Confidential Resources*). In this case, no further action will be taken unless the complainant decides to do so, with the exceptions noted previously.
- Report the incident to a Houghton College official (see *Responsible Employees*) who can offer discretion and sensitivity to privacy but who may still be required by law or College policy to inform one or more additional College officials (including the Title IX Coordinator) about the incident. A Responsible Employee will communicate regarding his/her role and the limitations of confidentiality. In addition, he/she will explain what information may need to be communicated and the person with whom this information will be shared. The Responsible Employee will provide information about confidential sources of support.
- Contact the Title IX Coordinator. The Coordinator will provide information regarding supportive confidential services, will explain the limits of confidentiality and will consider requests for exemptions regarding confidentiality (see *Responsible Employees*); will provide information about the procedures Houghton College has in place to address violations of Title IX, including sexual harassment procedures and/or investigations involving sexual and relationship violence and stalking (see Houghton College *Procedures for Addressing Violations*); will provide the “Survivor’s Bill of Rights” and explain other relevant protocols and practices, such as the provision of interim measures, and the retaliation and amnesty policies; and will inform the survivor that a criminal complaint may be filed simultaneous to an on-campus investigation.
- Report the incident to local or New York State Police for the initiation of a criminal investigation.

IV. Houghton College Procedures for Addressing Sex-Based Discrimination, Sexual Harassment and Sexual and Relationship Violence and Stalking

Any member of the HC community who has experienced sex-based discrimination is encouraged to take action. The type of follow-up will depend upon the type of sex-based discrimination being alleged. The Title IX Coordinator and Deputy Coordinators, the Vice-President for Student Life and the Director of Human Resources are available to assist with decisions related to the most helpful and appropriate form of follow-up.

A. Procedures for addressing complaints of sexual or relationship violence or stalking

Any individual who has experienced sexual or relationship violence or stalking while participating in a Houghton College-sponsored program, or who is aware of a community member who has been harmed by such a violation, is encouraged to notify an authority. Houghton College has internal means of addressing such violations (see below) and also works with outside agencies, including the NY State Police and Cattaraugus Community Action Office of Victims Services, to ensure that violations are addressed appropriately and that survivors get appropriate follow-up care.

When a violation of the Student Conduct Code alleging sexual or relationship violence or stalking is made against a student respondent (accused), the Vice-President for Student Life is responsible for ensuring that procedures and protocols within the Student Guide are followed. Upon notification of a complaint, the Vice President of Student Life, in consultation with appropriate authorities (which may include the NY State Police, the Title IX Coordinator and the HC Office of Safety and Security), initiates appropriate protocols to ensure public safety. The preponderance of the evidence rule will be used in making decisions regarding accountability and an appeals process will be communicated in writing. The *Student Conduct Policy* outlines specifics related to investigative protocols, parity for the complainant and respondent in every aspect of the investigation, the *Survivor's Bill of Rights*, interim measures, the appeals process, and the range of disciplinary sanctions which may be applied, up to and including academic dismissal.

When a violation of the Student Conduct Code alleging sexual or relationship violence or stalking is made against an employee respondent (accused), the Director of Human Resources and the Title IX Coordinator oversee the College investigation, ensuring that it will occur in a timely fashion, that interim measures to protect the complainant are available, and that both the complainant and respondent are given equal opportunity and access at each phase of the investigation. Upon notification of a complaint, the Director of Human Resources, in consultation with appropriate authorities (which may include the NY State Police, the Title IX Coordinator, and the HC Office of Safety and Security), initiates appropriate protocols to ensure public safety. Interim measures during the investigation may include suspending the employee (respondent) with or without pay. The preponderance of the evidence rule will be used in making decisions regarding accountability and an appeals process will be communicated in writing. A range of disciplinary sanctions may be applied, up to and including termination of employment.

When a violation of the Student Conduct Code alleging sexual or relationship violence or stalking is made against a contracted employee of HC, such as one working for Metz or Sodexo, the Director of Human Resources and the Title IX Coordinator will meet with the company's local management to monitor all aspects of the investigation. Upon notification of a complaint, the Director of Human Resources, in consultation with appropriate authorities (which may include the NY State Police, the Title IX Coordinator and the HC Office of Safety and Security), initiates appropriate protocols to ensure public safety. The Director of Human Resources and Title IX Coordinator ensure that the investigation is thorough and equitable with protocols that are sufficiently clear, fair and timely. If not satisfied with the procedures or outcome of the investigation, the Director and Coordinator will pursue the matter at a higher level of management and/or take direct action to ensure that the HC community is free of discriminatory and harmful behaviors.

B. Procedures for addressing complaints of sex-based discrimination, including sexual harassment

1. **Informal Process.** There are two options for handling complaints informally, but **note that informal options are not recommended for addressing complaints that include sexual or relationship violence or stalking.** The first is to express the concern to the person responsible for the alleged violation, either verbally or in written form. The second option is to use a mediator, a neutral person mutually agreed upon by the two parties. The Title IX Coordinator and Deputy Coordinators are available to assist with the informal process, upon request.
2. **Formal Process.** Any person who wishes to file a formal complaint of sex-based discrimination, including sexual harassment, can do so by contracting the Title IX Coordinator, the Vice President for Student Life or the Director of Human Resources. The complaint must be received

within 1 year of the date of the latest incident. Action begins by the complainant signing a complaint report documenting the alleged incident(s). Upon receipt of the complaint report, the Title IX Coordinator will initiate a formal investigation based on procedures found above in *Procedures for addressing complaints of sexual or relationship violence or stalking*. When sex-based discrimination, including harassment, is substantiated, the respondent may be subject to such actions as:

- a. Initial and sustained counseling by a professional counselor;
- b. Letter of reprimand (a copy of which will become part of the personnel or student record);
- c. Change in employment status, grade or rank (for employee) or dismissal (for student)

Failure to comply with any of the required sanctions will result in further action.

V. Training and Education

The Title IX Coordinator works through specific departments on campus to ensure that all staff, faculty and students who have a role in investigating or responding to reports of sexual harassment, sexual violence, relationship violence and stalking receive adequate training for their responsibilities. These offices include those of Human Resources, Academic Dean, Dean of Students, Department of Residence Life, Department of Athletics, and Department of Safety and Security.

The Title IX Coordinator works through specific departments to ensure that all staff, faculty and students are aware of policies, procedures and resources related to the prevention of and response to incidents of sexual harassment, sexual violence, relationship violence and stalking. All new first-year and transfer students receive education related to the prevention of and response to instances of sexual and relationship violence and stalking. Student leaders, including resident assistants and athletes, receive additional training. Student bystander training is conducted annually. Employees receive training appropriate to their professional responsibilities.

VI. Climate Assessment, Mandated Record-Keeping and Reporting

The Title IX Coordinator oversees the periodic administration of a climate assessment survey to determine the prevalence of violations of Title IX policies, to measure awareness of policies and resources and to identify factors that may be inhibiting the reporting of Title IX violations.

The Title IX Coordinator will be responsible for keeping a written record of all complaints related to Title IX, including details related to the time and place of each incident and any other relevant facts, including the investigative process and outcome. The Title IX Coordinator works with the Office of Safety & Security to ensure that duties are fulfilled regarding the institution's responsibility to report data as mandated by the Clery Act. The Title IX Coordinator and the Advisory Committee on Campus Safety (also known as CHPP: Committee on Harassment Policy and Prevention) annually review, report on and make recommendations for change as specified by New York State law (see <http://codes.lp.findlaw.com/nycode/EDN/VII/129-A/6431>).