



August 1, 2024

Dear Members of the Campus Community,

I am writing with an important update related to the university's protections against discrimination, harassment, and sexual misconduct.

Background

Multiple federal and state laws prohibit discrimination, harassment, and/or sexual misconduct based on individual characteristics in the workplace or educational environment. One that is commonly referenced is Title IX of the Education Amendments of 1972 ("Title IX"). This federal law prohibits discrimination on the basis of sex in any educational program or activity at a school, college, or university that receives federal funds. The law is enforced by the federal Department of Education, and the regulations implementing this law have been reviewed and revised several times over the past fifteen years. Most recently, the Department of Education published new Title IX regulations in April 2024, with an effective date of August 1, 2024.

Review Process

Given the short turn around time, over the past few months, my office has worked closely with a cross-functional team of university partners to review the new regulatory requirements and assess our existing policies and approach to responding to complaints in order to develop a new [Policy Prohibiting Discrimination, Harassment, and/or Sexual Misconduct](#) ("new Policy") along with an associated [Procedure for Responding to Complaints of Discrimination, Harassment, and/or Sexual Misconduct](#) ("new Procedure") that complies with these new regulations and supports our campus. The new Policy and new Procedure are both now available on the university's website.

Effective Date and Rationale for one Policy and one Procedure

The new Policy and new Procedure apply to any conduct that occurs on or after August 1, 2024.

Combining the university's existing two policies into one new Policy makes it easier for members of the campus community to identify and report concerns about prohibited conduct, and reinforces the university's commitment to providing a community free from discrimination, harassment, sexual misconduct (including sexual assault or sexual violence, interpersonal (relationship) violence, sexual exploitation, and stalking), and retaliation.

Similarly, implementing one Procedure will allow for more transparency and consistency in the investigation and resolution process and assist with conducting and completing the process in a more timely manner. The Procedure assures that complaints are investigated and resolved similarly no matter the underlying basis, eliminates live hearings and live cross-examination of the parties in order to reduce the number of individuals who have to hear and assess the parties' information and evidence, allows for multiple investigators as needed, affirms that the investigator(s) will make findings and determine violations that are reported to a separate sanctioning officer. The new Procedure maintains some key provisions from our existing policies as well, such as supportive measures for both parties, the ability of parties to choose

their own advisors, and the ability of parties to participate in an informal (“agreement-based”) resolution.

Please note that the university will continue to maintain and apply the Policy Prohibiting Sex Discrimination, Sexual Harassment, and Sexual Misconduct and the Policy Prohibiting Discrimination and Harassment and both their associated procedures for any reported incidents that occurred prior to August 1, 2024.

Employee Obligations

The new regulations establish some important obligations for university faculty and staff:

- **Reporting Prohibited Conduct.** If you become aware of conduct that may be a violation of the new Policy, you must promptly report it to the Title IX Coordinator/Equal Opportunity Officer by completing the [online reporting form](#), emailing titleix-ooo@pugetsound.edu, or calling 253.879.3793.
- **Special Reporting Requirements for Employees who are Designated as Confidential or Privileged Resources.** Those employees who are designated as either a [Confidential or Privileged Resource](#) are not required to report prohibited conduct to the Title IX Coordinator/Equal Opportunity Officer, but are required to share certain information with the reporter including how they can contact the Title IX Coordinator/Equal Opportunity Officer and information about rights and options that may be available to them.
- **Notifying Students about Pregnancy-Related Resources.** If a student discloses to an employee that they are pregnant or have a pregnancy related condition, the employee must provide the student with the Title IX Coordinator/Equal Opportunity Officer's contact information and communicate that the Title IX Coordinator/Equal Opportunity Officer can help take specific actions to prevent pregnancy-related discrimination and ensure equal access. The employee should NOT report a student's pregnancy to the Title IX Coordinator/Equal Opportunity Officer.
- **Mandatory Training for Faculty and Staff.** All employees will now be required to complete Title IX training mandated by the 2024 Regulations. More information regarding this training will be announced soon.

As noted above, I am thankful for the valuable assistance and insight from the campus partners who joined me in this process from the following areas:

- Faculty: Seth Weinberger
- Students: Micah Beardsley, Kenovia Neely, Julia Swerdloff
- Staff: Joanna Carey Cleveland and Stacy Kelly (General Counsel and Risk Management), Erin Ruff (Human Resources), Miriam Chitiga (Intercultural Engagement), Dave Wright (Chaplaincy), Meara O'Malley (Dean of Students Office), Amy Gauthier (Student Accountability and Restorative Practices), and Eric Hetland and Sonya Dauncey (Student Support)

We will share fuller information and additional resources with the campus community at the beginning of the fall semester. In the meantime, please contact me if you have any questions or concerns or if you would like to schedule an information session with your area.

Sincerely,

Sandra Braedt
Title IX Coordinator and Equal Opportunity Officer
253.879.3793