POLICY ON SEXUAL MISCONDUCT

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This document sets forth Pacific Oaks College’s policy on sexual misconduct and outlines the College’s prohibitions against sexual misconduct, definitions of relevant terms, reporting and response procedures, and the rights and responsibilities of members of the POC Community who are impacted by sexual misconduct in relation to our academic and work environment.

Questions about Title IX, the Campus SaVE Act, and this policy may be directed to:

POC Title IX Coordinator:

Students may also direct questions about Title IX and the Campus SaVE Act to:

United States Department of Education Office of Civil Rights (OCR)

Customer Service Hotline: 800/421-3481

Website: www.ed.gov/ocr

E-mail: ocr@ed.gov

400 Maryland Avenue SW, Washington, DC 20202-1100
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I. POLICY SUMMARY
Pacific Oaks College (“The College” or “POC”) is committed to creating and maintaining a safe learning and working environment that is free of unlawful discrimination, harassment, exploitation, or intimidation. As such, The College prohibits sexual misconduct in all forms, including but not limited to sexual harassment and sexual violence. The College will respond promptly and effectively to reports of sexual misconduct, and will take appropriate action to prevent, to correct, and when necessary, to discipline behavior in violation of this Policy.

The College also bars retaliation against any employee, student, or applicant who files a good faith report of sexual misconduct or otherwise participates in an investigation relating to the same.

II. POLICY SCOPE

A. Applicability
This Policy applies to all employees, students, and other POC Community Members, regardless of gender/gender identity and sexual orientation, for conduct occurring The College’s campuses, in connection with its educational programs, activities and services, or that puts POC Community Members at risk of serious harm or otherwise creates a hostile learning and/or working environment.

B. Consensual Relationships
This Policy covers unwelcome conduct of a sexual nature. While romantic relationships between members of the POC Community may begin as consensual, they may evolve into situations that lead to sexual misconduct in violation of this Policy.

Consensual personal relationships between POC Community Members are subject to other policies and ethical considerations, including but not limited to those contained in the Employee Handbook (where applicable).

III. DEFINITIONS

Consent – At The College, consent is informed. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity.

Consent is voluntary. It must be given without coercion, force, threats, or intimidation. Consent means positive cooperation in the act or expression of intent to engage in the act pursuant to an exercise of free will.

Consent is revocable. Consent to some form of sexual activity does not imply consent to other forms of sexual activity. Consent to sexual activity on one occasion is not consent to engage in sexual activity on another occasion. A current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent. Even in the context of a relationship, there must be mutual consent to engage in sexual activity. Consent must be ongoing throughout a sexual encounter
and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately.

Consent cannot be given when a person is *incapacitated*. A person cannot consent if s/he is unconscious or coming in and out of consciousness. A person cannot consent if s/he is under the threat of violence, bodily injury or other forms of coercion. A person cannot consent if his/her understanding of the act is affected by a physical or mental impairment.

**In California**, “consent” means affirmative, conscious, and voluntary agreement to engage in sexual activity. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Lack of protest or resistance does not mean consent, nor does silence mean consent. Affirmative consent must be ongoing throughout a sexual activity and can be revoked at any time. The existence of a dating relationship between the persons involved, or the fact of past sexual relations between them, should never by itself be assumed to be an indicator of consent.

It shall not be a valid excuse to alleged lack of affirmative consent that the Respondent believed that the Complainant consented to the sexual activity under either of the following circumstances:

(A) The accused’s belief in affirmative consent arose from the intoxication or recklessness of the accused.

(B) The accused did not take reasonable steps, in the circumstances known to the accused at the time, to ascertain whether the complainant affirmatively consented.

It shall not be a valid excuse that the Respondent believed that the Complainant affirmatively consented to the sexual activity if the Respondent knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances:

(A) The Complainant was asleep or unconscious.

(B) The Complainant was incapacitated due to the influence of drugs, alcohol, or medication, so that the complainant could not understand the fact, nature, or extent of the sexual activity.

(C) The Complainant was unable to communicate due to a mental or physical condition.

**Dating Violence** is defined as abuse committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

**Domestic Violence** is defined as abuse committed against an adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant, or someone with whom the abuser has a child, has an existing dating or engagement relationship, or has had a former dating or engagement relationship.

**Incapacitation** is defined as the physical and/or mental inability to make informed, rational judgments. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where alcohol or drugs are involved, incapacitation is defined with respect to how the alcohol or other drugs consumed affects a person’s decision-making capacity, awareness of consequences, and ability to make fully informed judgments. Being intoxicated by drugs or
alcohol does not diminish one’s responsibility to obtain consent. The factors to be considered when determining whether consent was given include whether the accused knew, or whether a reasonable person should have known, that the complainant was incapacitated.

**POC Community Member(s) / POC Community** include all students, faculty, staff, vendors, contractors, community partners, and visitors.

**Responsible Employee(s)** is a POC employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or who a student could reasonably believe has this authority or duty.

**Sexual Assault** occurs when physical sexual activity is engaged without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, or taking advantage of the other person's incapacitation (including voluntary intoxication).

**Sexual Harassment** is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Sexual harassment is conduct that explicitly or implicitly affects a person’s employment or education or interferes with a person’s work or educational performance or creates an environment such that a reasonable person would find the conduct intimidating, hostile, or offensive. Sexual harassment includes sexual violence (see definition below). The College will respond to reports of any such conduct in accordance with the Policy.

Sexual harassment may include incidents between any members of the POC Community, including faculty and other academic appointees, staff, student employees, students, coaches, residents, interns, and non-student or non-employee participants in the College programs (e.g., vendors, contractors, visitors, and patients). Sexual harassment may occur in hierarchical relationships, between peers, or between individuals of the same sex or opposite sex. To determine whether the reported conduct constitutes sexual harassment, consideration shall be given to the record of the conduct as a whole and to the totality of the circumstances, including the context in which the conduct occurred.

**Sexual Misconduct** – includes, but is not limited to, sexual harassment and sexual violence, including forcible and non-forcible sex offenses, sexual assault, domestic violence, dating violence, or stalking, as defined herein.

**Sexual Violence** is defined as physical sexual acts engaged without the consent of the other person or when the other person is unable to consent to the activity. Sexual violence includes sexual assault, rape, battery, and sexual coercion; domestic violence; dating violence; and stalking.

**Stalking** is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.
IV. REPORTING SEXUAL MISCONDUCT

A. Making a Report to Pacific Oaks College
POC Community Members who have experienced sexual misconduct, or are aware of incidents experienced by other POC Community Members should immediately report the incident to the local police department.

Reporting sexual assault, domestic violence, dating violence, and stalking to the police does not commit the Complainant to further legal action. However, the earlier an incident is reported, the easier it will be for the police to investigate, if the Complainant decides to proceed with criminal charges.

In addition, members of the POC community, including employees, supervisors, co-workers, vendors, consultants, visitors or other students, are encouraged to report incident(s) of sexual misconduct to the College’s Title IX Coordinator. The College’s Title IX Coordinator is:

Director of Human Resources
Carolyn Mathis
Phone: (626) 529-8437
Email: cmathis@pacificoaks.edu

Complainants are not required to report to area law enforcement in order to receive assistance from or pursue any options within the College.

The Title IX Coordinator will provide victims of sexual misconduct with information about available support services and resources, and also assist the Complainant in notifying law enforcement, including the local police, if the Complainant elects to do so.

B. Reporting and Confidentially Disclosing Sexual Violence: Know the Options
The College encourages victims of sexual violence to talk to somebody about what happened — so victims can get the support they need, and so the College can respond appropriately.

This section is intended to make students aware of the various reporting and confidential disclosure options available to them — so they can make informed choices about where to turn should they become a victim of sexual violence. The College encourages victims to talk to someone identified in one or more of these groups.

1. The Options

   a. Privileged and Confidential Communications

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1 The College does not employ professional, licensed counselors or pastoral counselors to provide on-campus mental-health counseling and related services to members of the POC Community. The College’s faculty and staff who are licensed as counselors are not employed by the College in such a capacity. As such, communications with the College’s faculty and staff are not privileged or confidential. In addition, faculty and staff who are licensed to provide
Professional, licensed counselors and pastoral counselors who are not employed by the College are not required to report any information about an incident to the Title IX coordinator without a victim’s permission.

In addition to the variety of professional, licensed counselors and pastoral counselors located near each POC educational setting, the College offers as a benefit to its students and employees the following resources that provide professional counseling services:

- **ComPsych Student Assistance Program:** POC is proud to partner with ComPsych Student Assistance Program, a free, confidential, around-the-clock counseling service.
  855-460-6668
  www.guidanceresources.com
  Web identifier: Pacific

- **Employee Assistance Program (EAP):** POC employees also receive counseling services through the EAP, which is available 24 hours a day, 7 days a week.
  800.272.7255
  www.guidanceresources.com
  Your company web ID: COM589

Counselors who provide services to POC Community Members through the Student Solutions and EAP programs are not required to disclose reports of sexual misconduct to the College’s Title IX Coordinator. While professional and non-professional counselors and advocates may maintain a victim’s confidentiality vis-à-vis the College, they may have reporting or other obligations under state law.

While POC Community Members are encouraged to use their own judgment in terms of whom they chose to report discuss reports of sexual misconduct with, POC Community Members must also understand that the College can only investigate and respond to incidents of sexual misconduct that it becomes aware of. A victim who at first requests confidentiality may later decide to file a complaint with the College or report the incident to local law enforcement, and thus have the incident fully investigated.

**b. Reporting to “Responsible Employees.”**

A “Responsible Employee” is a POC employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or who a student could reasonably believe has this authority or duty.

When a victim tells a Responsible Employee about an incident of sexual violence, the victim has the right to expect the College to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably.

A Responsible Employee must report to the Title IX Coordinator all relevant details about the alleged sexual misconduct shared by the victim and that the College will need in order to mental-health counseling and related services may have reporting or other obligations under state law.
determine what happened – including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a Responsible Employee will be shared only with people responsible for handling the College’s response to the report. A Responsible Employee should not share information with law enforcement without the victim’s consent or unless the victim has also reported the incident to law enforcement.

The following employees (or categories of employees) are the College’s Responsible Employees:

- Title IX Coordinator
- Student Affairs Employees
- Human Resources Employees
- Campus Presidents and Deans

Before a victim reveals any information to a Responsible Employee, the employee should ensure that the victim understands the employee’s reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources.

If the victim wants to tell the Responsible Employee what happened but also maintain confidentiality, the employee should tell the victim that the College will consider the request, but cannot guarantee that the College will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the Responsible Employee will also inform the Coordinator of the victim’s request for confidentiality.

Responsible Employees will not pressure a victim to request confidentiality, but will honor and support the victim’s wishes, including for the College to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to.

2. How The College Will Weigh the Request and Respond to Requests for Confidentiality.

If a victim discloses an incident to a Responsible Employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the College must weigh that request against the College’s obligation to provide a safe, non-discriminatory environment for all students, including the victim.

If the College honors the request for confidentiality, a victim must understand that the College’s ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited. Although rare, there are times when the College may not be able to honor a victim’s request in order to provide a safe, non-discriminatory environment for all students.

The College has designated the Title IX Coordinator to evaluate requests for confidentiality once a responsible employee is on notice of alleged sexual violence.

When weighing a victim’s request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:
• The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:
  o whether there have been other sexual violence complaints about the same alleged perpetrator;
  o whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
  o whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;
  o whether the sexual violence was committed by multiple perpetrators;
• whether the sexual violence was perpetrated with a weapon;
• whether the victim is a minor;
• whether The College possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
• whether the victim’s report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the College to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the College will likely respect the victim’s request for confidentiality.

If the College determines that it cannot maintain a victim’s confidentiality, the College will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the College’ response.

The College will remain ever mindful of the victim’s well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students, employees or other POC Community Members, will not be tolerated. The College will also:
• assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these);
• provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and
• inform the victim of the right to report a crime to campus or local law enforcement – and provide the victim with assistance if the victim wishes to do so.

The College may not require a victim to participate in any investigation or disciplinary proceeding.

Because the College is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the College to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.
If the College determines that the alleged perpetrator(s) pose a serious and immediate threat to the POC Community, Campus Security Authorities may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the victim.

If the College determines that it can respect a victim’s request for confidentiality, the College will also take immediate action as necessary to protect and assist the victim.

V. THE COLLEGE’S RESPONSE PROCEDURES
Upon receiving a report of sexual misconduct, the College will respond by providing the complainant with supportive resources and interim interventions (where appropriate) and conducting a prompt, fair and impartial investigation by a trained official. The response and investigation procedures are designed to provide a supportive process for those who report sexual misconduct as well as fairness and due process for the individual being accused.

A. Services
Upon notice of possible sexual misconduct within the scope of this policy, the College will provide the Complainant with information about local resources and other supports relevant to sexual misconduct.

If requested, other participants in the process (such as Reporters or Witnesses) may also be offered appropriate support services and information.

Please visit the following page for specific information about local resources and supports that may be available to assist POC Community Members: Link to resources information contained in Annual Security Report.

B. Interim Interventions
During an investigation, interim protections for both parties may be put in place, regardless of whether the Complainant chooses to report the incident to local law enforcement. If requested by the Complainant and reasonably available, interim protections may include changes to academic and/or working situations. Such interventions may be kept in place until the conclusion of the Title IX investigation, sanctioning and appeal processes.

C. Options for Resolution

1. Informal Resolution
The College recognizes that in certain circumstances, informal resolution of a report of sexual misconduct may be beneficial to the Complainant, the Respondent, other involved parties (the Reporting Party, Witnesses), and/or the POC Community at large. Whether a report of sexual misconduct is appropriate for informal resolution is within the discretion of the Title IX Coordinator. However, reports of sexual assault are never appropriate for informal resolution.

In circumstances where informal resolution is appropriate, and with the consent of both the Complainant and the Respondent, the College may utilize informal methods to resolve a report of sexual misconduct. In order to pursue informal resolution, the Title IX Coordinator must obtain the consent of both the Complainant and the Respondent, which may be withdrawn at any time during the investigation and/or sanctions process.
2. Decision to Formally Investigate
When the Title IX Coordinator determines that informal resolution is not appropriate or formal resolution is requested by either the Complainant or Respondent, the College will proceed in launching an investigation.

In circumstances where a Complainant requests confidentiality or asks that the College not pursue investigation into a report of sexual misconduct, the Title IX Coordinator will determine whether the Complainant’s request can be honored. In making such a determination, the Title IX Coordinator will consider the following:

- The seriousness of the sexual misconduct as reported;
- the Complainant’s age;
- Whether there have been other reports about the same Respondent;
- The Respondent’s rights to receive information about the allegations if the information is maintained by the school as an “education record” under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 C.F.R. Part 99.1

While the College will always seek to obtain the consent of the Complainant prior to pursuing a formal investigation, the final decision on whether to investigate a report of sexual misconduct lies with the Title IX Coordinator.

D. Investigation
Once the Title IX Coordinator determines that a formal investigation is appropriate, the College will conduct a thorough and impartial investigation by an individual who has been trained to investigate reports of sexual misconduct (this may include the Title IX Coordinator, a Deputy Title IX Coordinator, or other designee approved by the President).

Typically, investigation into reports of sexual misconduct will include a period of fact-finding led by the Title IX Coordinator, during which time the Complainant, Respondent, and other relevant parties will be given the opportunity to participate in the investigation by sharing information with the Title IX Coordinator. Parties participating in an investigation will have the opportunity to submit a written statement, provide supporting materials, and identify witnesses.

The College investigates reports of sexual misconduct independently of local law enforcement.

Absent delay to allow police to gather evidence or agreement by the parties, the College will make every reasonable effort to investigate and reach a resolution on all reports of sexual misconduct within sixty (60) calendar days after the Title IX Coordinator’s receipt of a report.

E. Standard of Proof
In investigating and determining whether a violation of this policy has occurred, the Title IX Coordinator will utilize the “preponderance of the evidence” standard of proof. This means that Title IX Coordinator will determine whether it is “more likely that not” that sexual misconduct occurred.

F. Investigation Findings and Outcome Notification
Prior to concluding an investigation into sexual misconduct, the Title IX Coordinator will provide both the Complainant and Respondent an opportunity to review his/her own statement. Both the Complainant and the Respondent will be permitted five (5) calendar days to submit any inaccuracies or further evidence to the Title IX Coordinator. After five (5) calendar days have
passed, the Title IX Coordinator will address any inaccuracies and/or further evidence submitted by the parties, and make a determination as to whether a violation of this policy occurred.

Both parties to complaint of sexual misconduct will be updated as to the status of the investigation and related proceedings as necessary, or upon request.

Once the Title IX Coordinator has concluded the investigation, the College will simultaneously issue the written findings to both the Complainant and the Respondent.

Upon finding that sexual misconduct occurred, the Title IX Coordinator will commence the sanctioning process for review and determination of appropriate sanctions.

In addition to sanctions, the Title IX Coordinator may also recommend that the College or particular POC Community Members take on additional measures to remediate and/or prevent further conduct in violation of this policy.

VI. SANCTIONING

POC Community Members who are found to have violated the College’s prohibitions against sexual misconduct will be subject to sanctions.

A. POSSIBLE SANCTIONS

Sanctions may include, but are not limited to the following:

- Formal written warning;
- Academic Development Plan or Professional Improvement Plan, as applicable;
- No contact order pertaining to certain POC Community Members or physical locations;
- Removal from specific courses or institutional activities; and/or
- Dismissal.

In addition, further protections for the Complainant may be available.

B. DETERMINATION OF APPROPRIATE SANCTIONS

The College’s sanctions process is intended to provide an equitable process to both the Complainant and the Respondent, demonstrating promptness, fairness and impartiality.

1. Sanctions Against Students and Non-Employee POC Community Members

Absent informal resolution, upon a finding that a student or other non-employee POC Community Member has engaged in sexual misconduct in violation of this policy, both the Complainant and the Respondent will be permitted five (5) calendar days to submit to the Title IX Coordinator a Statement of Impact. The Statement of Impact shall be limited to how the conduct underlying the findings has affected the writer and whether the writer believes there are any mitigating or extenuating circumstances that should be considered in issuing sanctions.

Simultaneously, the Title IX Coordinator will convene a Sanctions Panel. The Sanctions Panel will be composed of at least three members of a pool of Academic Affairs Administrators (named as Chairperson) and faculty trained in sanctioning violations of this policy, at least one of whom shall be a member of the POC President’s Cabinet.
After convening a Sanctions Panel, the Title IX Coordinator will submit the investigative findings and the Title IX Coordinator’s recommended sanctions and the party’s Statements of Impact to the Sanctions Panel.

Within five (5) business days of receipt of the Title IX Investigator’s findings and any submitted Statements of Impact, the Sanctions Panel shall meet to determine what, if any, sanctions will be issued. In making such a determination, the Sanctions Panel will not reconsider the Title IX Coordinator’s findings, but will determine in light of the Title IX Coordinator’s findings and the additional documents submitted, what sanctions are appropriate to remedy the violation and maintain or enhance safety from sexual violence in the College’s learning and working environment.

All members of the Sanctions Panel must be trained annually on matters related to this policy.

2. Sanctions Against Employees
If Pacific Oaks determines that unlawful harassment has occurred by an employee, effective remedial action will be taken in accordance with the circumstances involved. Appropriate action will also be taken to deter any future unlawful harassment. Any employee determined by Pacific Oaks to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to and including immediate separation of employment. If the harasser is a nonemployee, such as a vendor or supplier, such corrective action may include separation of the business relationship with the harasser by Pacific Oaks.

C. NOTICE OF SANCTIONS IMPOSED
When sanctioning results from an investigation into sexual misconduct, the College will simultaneously inform both the Complainant and the Respondent, in writing, of:

- The outcome of any sanctioning proceedings;
- The College’s procedures for appeal;
- Any changes in the outcome of sanctioning proceedings that occur; and
- When the outcome of sanctioning proceedings becomes final.

The outcome of sanctioning decisions shall become final on the following date:
- If neither the Complainant nor the Respondent appeal the sanctioning decision, the first business day after the opportunity to appeal has passed;
- If either the Complainant or the Respondent appeals the sanctioning decision, the date of issuance of the appeal decision.

VII. APPEALS OF INVESTIGATIVE FINDINGS AND SANCTIONS DECISIONS BY STUDENTS
Both the Complainant and the Respondent may appeal the outcome of investigative findings and any sanctions decision by submitting a written letter of appeal to the Provost within five (5) business days of issuance of the investigative findings and sanctions decision. The written request must include:

- A specific statement of the decision that the student wishes to appeal;
- The student’s desired outcome;
- All information that the student wishes the Provost to take into account in consideration of the appeal; and
- A statement of the student’s views as to how this information justifies the appeal.

The appeals process is not an opportunity for either party to have his or her case reconsidered merely because of dissatisfaction on the part of the student with the sanctions decision. Rather, all appeals must be based on one or more of the following:

- New information that could not be presented at the time of the investigation or sanctions decision; or
- Evidence of improper procedure that may impact the outcome.

Because this process is an institutional one rather than a judicial one, the presence of legal counsel for anyone whether an in-person or virtual attendant, is prohibited. If in the opinion of the Provost the request for an appeal is without merit or does not meet the requirements set forth above, the Provost will reject the appeal.

If in the judgment of the Provost the appeal is properly constituted, the Provost will determine what next steps are appropriate, which may include but is not limited to denying the appeal, remanding the matter to the Title IX Coordinator for further investigation or remanding to the Sanctions Panel for reconsideration. The Provost will issue his/her decision within five (5) business days of receipt of the letter of appeal.

Employees and other non-student POC Community Members do not have a right to appeal.