

# Sexual and Gender-Based Misconduct Grievance Procedures and Program

This document details the University procedures for responding to Covered Behavior described in the Sexual and Gender-Based Misconduct Policy (Policy) at <a href="https://wmich.edu/policies/sexual-misconduct">https://wmich.edu/policies/sexual-misconduct</a>. Related concepts are capitalized and defined or further explained in the Policy.

### **GRIEVANCE PROCEDURES**

Anyone needing an accommodation or support to fully participate in any component of the grievance process should contact the Title IX Coordinator.

### 1. Assessment

Upon receipt of a Report or Formal Complaint, the Title IX Coordinator, or designee in Institutional Equity (IE), will conduct an assessment, which will be completed in no more than ten calendar days from IE's receipt of the Report. The Title IX Coordinator will consult with the Coordinated Response Team, as needed. The Team may consist of a representative from any of the following areas; Public Safety, Student Affairs, Academic Affairs, Human Resources, Athletics and IE. Subject matter experts may be consulted as needed.

The assessment will proceed to the point where a reasonable assessment of the safety of Complainant and of the campus community may be made, and the University has sufficient information to determine the best course of action. Relevant Supportive Measures or Emergency Removal will be discussed and implemented as needed (described in Policy section 12.2: Supportive Measures). Complainant will be advised of <u>resources</u> and the importance of preserving physical evidence and the procedure for doing so in a timely manner. Complainant may have a support person and/or advisor present at any meeting or interview.

In the course of the assessment, the University will consider the interest of Complainant and Complainant's expressed preference for manner of resolution. As outlined in *Policy Section 10: Complainant Agency and Autonomy Not to Proceed*, where possible, and as warranted by an assessment of the facts and circumstances, the University will seek action consistent with Complainant's request.

At the conclusion of the assessment, the Title IX Coordinator or designee will determine the appropriate action. The University, through the Title IX Coordinator, may: 1) refer a report of behavior not covered by this Policy to the Office of Student Conduct (OSC) or other administrative office; 2) file a Formal Complaint to pursue an informal resolution that does not involve disciplinary action against Respondent; or, 3) file a Formal Complaint to initiate an investigation to determine if there has been a Policy violation, and if so, whether sanctions/disciplinary actions are warranted.

In such cases where a report is referred, IE will not investigate, but will maintain a file for the case in the event that a future incident requires further review under the Policy.



IE will communicate the decision as to how to proceed to Complainant in writing. That notice will include whether the alleged incident meets the specific standards outlined in Title IX, which could allow additional recourse through the Department of Education, Office of Civil Rights. Complainant may appeal the designation of the Report as Non-Title IX Sexual Misconduct.

Depending on the circumstances and requested resolution, Respondent may or may not be notified of the Report or resolution. Respondent shall be notified of the outcome of the assessment if the University seeks action that would impact Respondent, such as Emergency Removal, other actions that restrict Respondent's movement on campus, or the initiation of an investigation.

In identifying resolution options, the Title IX Coordinator, or designee will consider the nature of the reported behavior, the safety of the Parties and of the campus community, Complainant's expressed preference for resolution, the necessity of any Safety Measures, and Respondent's due process rights.

Where conduct involves the potential violation of both the Policy and the Non-Discrimination Policy, the provisions of the Policy will apply. In such cases, IE will conduct a single investigation that encompasses all relevant allegations. Covered Behavior may also be a violation of provisions of other University policies, rules, and collective bargaining agreement requirements.

#### 2. Informal Resolution

Informal resolution is an option available to the Parties at any time after a Formal Complaint has been filed. It is designed to eliminate a hostile environment by taking alternative actions that do not involve disciplinary action against Respondent. Where the Title IX Coordinator or designee concludes that an informal resolution may be appropriate, the University may take corrective action through the imposition of individual and community remedies designed to maximize Complainant's access to the educational, extracurricular, employment and other activities at the University, to eliminate any hostile environment, but not unreasonably burden either Party.

Potential remedies may include Safety Measures, targeted or broad-based educational programming or training, supported direct confrontation of Respondent, Emergency Removal of Respondent(s), and/or indirect action as determined by the University. The consequence(s) for violating an informal resolution will be determined on a case-by-case basis and incorporated into the written agreement. For example, an allegation of violating a signed informal resolution may be referred to the Office of Student Conduct for review under the Student Code (section B.08 Failure to Comply). Participation in an informal resolution is voluntary and either Party may request to end it at any time and continue with the formal resolution process.

For an informal resolution, the University may offer mediation or restorative justice options for appropriate cases, but it will not compel Complainant to directly confront Respondent, or to participate in any particular form of an informal resolution.

The decision to use an informal resolution will be made when the University has sufficient information



about the nature and scope of the conduct, which may occur at any time after a Formal Complaint has been filed. If the University and Parties decide to use informal resolution, the University will provide written notice to the Parties. IE will maintain records of all reports and conduct referred for an informal resolution in accordance with the University's document retention guidelines.

#### 3. Formal Resolution

If Complainant elects to go forward with a formal resolution, IE will open an investigation into the allegation(s). The investigation will be followed by a live hearing. The hearing will result in a determination of whether Respondent is responsible for violating the Policy.

## A. Investigation

It is the responsibility of the University, not the parties, to gather relevant evidence, to the extent reasonably available.

Upon beginning an investigation, IE will provide written notice to the Parties. At any time in the Grievance Process, Respondent may opt to accept responsibility for the alleged behavior in writing. The signed written complaint and signed acceptance of responsibility will be maintained in the evidence file.

The investigator or designee will provide timely updates, as appropriate or requested, about the timing and status of the investigation.

The University will use its best efforts to complete its investigation within 60 calendar days of receipt of the signed Formal Complaint. This timeframe may be extended for good cause. Good cause may exist for a variety of factors including: the complexity of the circumstances of each allegation; the integrity and completeness of the investigation; the need to comply with a request from external law enforcement; to accommodate the availability of witnesses; to account for University breaks or vacations; or for other legitimate bases. If the process will take longer than 60 calendar days, IE will notify the Parties of the delay, the reason for the delay, and an anticipated timeframe for moving forward.

The University will designate an investigator(s) of its choosing. The investigator will typically be a member of IE staff; however, the investigator may be any appropriately designated employee of the University or an external investigator engaged to assist the University in its fact gathering. Any investigator chosen to conduct the investigation must be impartial, free of any actual or perceived conflict of interest, and must have specific training and experience investigating allegations of sexual and gender-based misconduct.

The investigator will conduct the investigation and coordinate gathering information from Complainant, Respondent and any other individuals who may have information relevant to the determination. The investigator will also gather any available physical evidence, including documents, communications between the parties, and other electronic records as appropriate.



The investigator may record interviews and have them transcribed. If so, the relevant portions of the interview will be included with other evidence and in the investigative report for review. The recording will be maintained as part of the case materials with IE. The recording will remain the property of the University. Audio or digital recordings are prohibited by anyone other than the investigator. Parties or witnesses who fail to abide by this expectation are subject to disciplinary action through applicable University policies or other appropriate sanctions.

If the investigator consults a medical expert for an opinion or other evidence to assist in the investigation, that medical professional shall not have an actual or perceived conflict of interest relating to any of the Parties or the University.

The investigation will be thorough, impartial and fair, and all individuals will be treated with sensitivity and respect. The investigation will be conducted in a manner that is respectful of individual privacy concerns and in a manner appropriate in light of the circumstances of the case.

All parties and witnesses must provide truthful information. Knowingly providing materially false or misleading information in bad faith is a violation of University policy and may subject a student or employee to disciplinary action. A determination regarding responsibility, alone, is not sufficient to demonstrate that a Party acted in bad faith.

In gathering information, the investigators may consider other allegations of, or findings of responsibility for, similar conduct by Respondent to the extent such information is relevant to the Report being investigated and is available. Such information may be relevant to prove motive, intent, absence of mistake, pattern or another material fact.

A Complainant's prior sexual history or predisposition relates to the matter being investigated only in the following circumstances:

- It is offered to prove that someone other than Respondent(s) committed the conduct alleged by Complainant(s); or
- It concerns specific incidents of Complainant's prior sexual behavior with respect to Respondent and are offered to prove consent.

Complainant and Respondent will have an equal opportunity to be heard, to submit information, and to identify witnesses who may have relevant information. Witnesses must have observed the acts in question or have information that relates to the alleged Covered Behavior.

The investigator will determine whether any proffered information relates to the Complaint. The investigator will not consider statements of personal opinion, rather than direct observations or reasonable inferences from the facts, or statements as to any Party's general reputation for any character trait, including honesty.

B. Review of Evidence and Investigative Report



At the conclusion of the investigation, but prior to the completion of the investigative report, the investigator will gather all related evidence and provide it to each Party. Parties will have ten calendar days from when the investigator provided it to review. Either Party may offer correction, clarification or additional evidence during that time.

The investigators will then prepare a written report that summarizes the Complaint, details any exculpatory and inculpatory evidence, identifies the potential Policy violations, and synthesizes the areas of agreement and disagreement between the Parties and any supporting information or accounts.

The Parties will be given the investigative report no less than ten calendar days before the scheduled hearing. Any Party may submit a response to the investigative report.

Any Party may request an informal resolution after reviewing the evidence and/or the investigative report.

## C. Hearing

The University will appoint a Hearing Officer to oversee the hearing and make a finding using the preponderance of the evidence standard (more likely than not; greater than 50%). The Hearing Officer may not be the Title IX Coordinator nor an investigator who investigated the. In reaching a determination, the Hearing Officer may consult with the Office of the General Counsel or other appropriate administrator.

The hearing date will be set to allow Parties a reasonable amount of time to prepare, but in no case will it be sooner than ten calendar days after the University sends the investigative report to the Parties.

The hearing may be conducted using videoconferencing, which allows the Parties to participate from separate locations.

IE will provide procedures and guidelines to assist the Parties and advisors through the hearing process. Each Party shall have the same opportunities and rights within those procedures. An advisor is required; if a Party does not have an advisor, the University will provide one at no charge prior to the hearing. IE will provide a list of on-campus and community advisors. The Party and advisor will participate in a prehearing orientation to review the hearing process and decorum.

During the hearing, the advisor for each Party will have an opportunity to ask questions of investigator(s) and any person that submitted statements or evidence related to the allegation. The Hearing Officer will review each question before the participant answers to assess relevance and determine whether the question may proceed. The Hearing Officer must explain the basis of their relevance determination. No Party will be permitted to ask questions of any other Party, investigators or any witness.

After the hearing, the Hearing Officer will decide whether Respondent violated the Policy based on the



investigative report and the information obtained in the hearing.

The Hearing Officer will prepare a final report for the Title IX Coordinator, which includes the finding and the rationale. Notwithstanding the finding in cases involving Employee Respondents, a Hearing Officer may recommend changes in the workplace to remedy the environment.

Within 30 calendar days of the Hearing, Parties will simultaneously receive a written outcome notice which will include a summary of the investigation steps, the finding, the rationale for the finding, sanctions (if applicable) and instructions for filing an appeal of the finding or sanction. The notice will contain the date by which the requirements must be satisfied by Respondent (if applicable), and the consequences of failure to satisfy the requirements. The outcome letter will also provide each Party with their appeal options. If, under extenuating circumstances, there are any changes to the outcome, both parties will be simultaneously notified at the earliest possible time.

The University may notify appropriate administrators as necessary to implement the outcome and/or sanctions.

### D. Sanctions

Sanctions may only be imposed by a designated disciplinary authority.

Any sanction will be designed to eliminate the misconduct, prevent its recurrence, and remedy its effects, while supporting the University's educational mission and Title IX obligations. Sanctions or interventions may also serve to promote safety or deter individuals from similar future behavior.

In order to reach a just and appropriate resolution in each case, the disciplinary authority will consider the following factors when determining whether to impose a sanction and/or what sanction to impose:

- the nature and violence of the conduct at issue;
- the impact or implications of the conduct on Complainant, the community, or the University;
- prior misconduct by Respondent, including Respondent's relevant prior discipline history, both at the University or elsewhere, and any criminal convictions;
- whether Respondent has accepted responsibility for the conduct;
- maintaining a safe and respectful environment conducive to learning;
- protecting of the University community; and,
- any other mitigating, aggravating, or compelling circumstances.



The disciplinary authority may consult with the Title IX Coordinator, General Counsel or other appropriate administrator as necessary. The disciplinary authority must notify IE, in writing, of the sanction, and the rationale for the sanction, for inclusion in the above referenced outcome letter.

### i. Additional Considerations for Faculty and Staff

Sanctions for Faculty and Staff as Respondents will be determined as follows:

- Sanctions for employees who are members of a collective bargaining unit will be imposed in accordance with the applicable collective bargaining agreement.
- Sanctions for other employees shall be determined in accordance with Human Resources' policies and procedures, individual contracts, and/or appointment letters.
- All rights afforded to Respondent employees through a collective bargaining agreement, Human Resources policy or procedure, individual contract, or appointment letter will also be afforded to Complainant.
- Potential sanctions include training, referral to counseling, job modification, warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay and termination.

Nothing in this Policy is intended to limit employee rights under Title VII of the Civil Rights Act of 1964.

#### ii. Additional Considerations for Students

The Director of OSC or designee will be the disciplinary authority for Student Respondents. For a student employee who is acting within the scope of their employment at the time of the incident, the outcome may involve additional sanctioning imposed by their employment supervisor.

The sanctions listed below may be imposed upon any student found to be responsible for violating this Policy. Sanctions may be used independently or in combination depending on the particular circumstance of the violation. More than one of the sanctions may be imposed for any single violation; previous violations of this Policy and/or any policies listed in the WMU Student Code shall increase the severity of sanctions applied. Sanctions are listed in order of severity from least severe to most severe.

- Warning: verbal or written notice that specific inappropriate conduct is unacceptable
- Reprimand: an official written censure containing three components: A reprimand for inappropriate behavior, notice that the conduct associated with the violation must stop immediately and permanently, and notice that additional violations shall result in more severe sanctions
- Behavior Contract: a written contract between the student and the University wherein the student agrees to correct inappropriate behaviors.
- Discretionary Sanctions: Service to the University, service to the community, attendance at educational seminars, classes, or workshops, written assignments, or other activities deemed appropriate by the conduct body. The student is required to submit written proof of



participation in and/or completion of the sanction to the conduct body. (Some seminars, classes, and workshops may require a registration fee.)

- Loss of Privileges: Denial of specified privileges for a designated period of time. Examples of privileges that can be denied include: academic program dismissal, campus registration of an automobile, parking in a specific area or during specific time periods, access to a building or portion of a building, access to a program, on-campus living, holding of an office in a Registered Student Organization, participation in extra-curricular activities, access to a particular living group and any other privilege that the conduct body deems appropriate to deny.
- Probation: Probation requires that a student's conduct be reviewed for a specified period of time. Conditions of the probationary period will be specified to the student by the OSC Director/designee and may be applied during the probationary period. All conditions must be satisfied and verified prior to the completion of the probationary period. If a student is found responsible for violation of any institutional policy(s) during the probationary period, more severe sanctions could be applied.
- Suspension: Separation of the student from the University or a University program for a period of time, after which the student is eligible to return. During this time, the student under suspension shall forfeit all rights of her/his student status for the duration of her/his suspension and may have her/his privileges of access to University premises revoked. Conditions for readmission and/or continued enrollment after re-admittance may be specified. All conditions for readmission must be satisfied, completed and certified to the OSC/or designee prior to readmittance. Also, a written plan for adherence to conditions of continued enrollment after readmittance from a suspension shall be provided to the OSC/or designee for review and approval.
- Expulsion: Permanent separation of the student from the University. An expelled student shall have no access to University premises and shall forfeit all rights of her/his student status immediately and permanently upon expulsion
- Revocation of Degree: A degree awarded from WMU may be revoked for fraud, misrepresentation, or other violation of University standards in obtaining the degree, or for other serious violations committed by a student prior to graduation. Being a degree holding alumnus is sufficient association with the University and basis for application of this sanction.
- Withholding Degree: The University may withhold awarding a degree otherwise earned until
  the completion of the process set forth in this Policy, including the completion of all sanctions
  imposed, if any.

## E. Appeal of Finding

Either Party may appeal the finding within five calendar days of the date on the written notice of the outcome. The following are the accepted bases for appealing a finding, but only if they affect the outcome of the matter:

- procedural irregularity;
- newly discovered evidence; and/or



• when it is determined that the Title IX Coordinator, investigator, or decision-maker(s) had a conflict of interest or bias.

Appeals must be in writing, cite one of the above bases for the appeal, and provide sufficient and detailed information to support the appeal. The University may deny an appeal if these conditions are not met. An interdisciplinary Appeals Committee will review and decide appeals. Each member of the Committee shall be trained to handle issues related to sexual misconduct and the Policy and will be impartial.

Appeals shall be limited to a review of the file and supporting documents (except as necessary to gain insight into any new information).

After review, the Appeals Committee may take any of the following actions in response to an appeal:

- uphold the findings;
- reverse a finding of responsibility for any or all charges;
- require that IE reopen the investigation and re-adjudicate the claim.

Decisions made by the Committee shall be final.

## F. Appeals of Sanctions

Either Party may appeal the sanction within five calendar days of the date on the written notice of the outcome. The following are the accepted bases for appeal of the sanction(s), but only if they affect the outcome of the matter:

- procedural irregularity; and/or
- the disciplinary authority had a conflict of interest or bias.

The underlying investigation and the determination of responsibility will provide the foundation for any further review of the sanction; no new investigation or finding with respect to responsibility will occur.

Employee Complainants and employee Respondents may appeal sanctions through established grievance processes for their employee group. The Title IX Coordinator will assist the Party in initiating the process. The grievance decision-maker will forward the appeal decision in writing to the Parties, Human Resources and IE.

Student Complainants or Respondents may submit written appeal to the Vice President of Student Affairs within five business days of the date on the written outcome notice. The receipt of the appeal will be acknowledged in writing by the OSC, which may include email. Each Party will be given the opportunity to review and respond in writing to the other Party's appeal. Any review of the other Party's appeal and any subsequent response by the opposing Party must be submitted to the OSC within five (5) University business days from the notification of the appeal. All appeal documents from each Party will be considered together in one review process.



The Vice President for Student Affairs or designee will review the appeal of student sanctions and must remain impartial in performing this function. They will forward the appeal decision in writing to the OSC and IE. The OSC will contact the Parties with the outcome. The appeal decision of the Vice President for Student Affairs or designee is final.

In some cases, at the discretion of the Title IX Coordinator and Director of the OSC, the imposition of student sanctions may take effect immediately and will not be stayed pending the resolution of the appeal. In most instances, however, decisions made regarding student sanctions shall not be final until an appeal deadline has passed with no appeal by either Party or at the conclusion of the appeal process.

## 4. Sexual Harassment Supplemental Information

### Sexual harassment:

- May be blatant and intentional and involve an overt action, a threat or reprisal, or may be subtle and indirect, with a coercive aspect that is unstated.
- Does NOT have to include intent to harm, be directed at a specific target, or involve repeated incidents.
- May be committed by anyone, regardless of gender, age, position or authority. While there is often a power differential between two persons, perhaps due to differences in age, social, educational or employment relationships, harassment can occur in any context.
- May be committed by a stranger, an acquaintance, or someone with whom the Complainant has an intimate or sexual relationship.
- May be committed by or against an individual or may be a result of the actions of an organization or group.
- May occur by or against an individual of any sex, gender identity, gender expression or sexual orientation
- May occur in the classroom, in the workplace, in residential settings, or in any other context.
- May be a one-time event or may be part of a pattern of behavior.
- May be committed in the presence of others or when the parties are alone.
- May affect the Complainant and/or third parties who witness or observe harassment.

Examples of conduct that may constitute sexual harassment as defined above may include a severe, persistent or pervasive pattern of unwelcome conduct that includes one or more of the following:

- Sexual Assault, Stalking, Non-Consensual Sexual Contact, Sexual Exploitation, and Intimate Partner Violence, as defined in the Policy.
- Physical conduct:
  - Unwelcome touching, sexual/physical assault, impeding, restraining, or blocking movements



### • Verbal conduct:

- o Making or using derogatory comments, epithets, slurs or humor
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations
- Objectively offensive comments of a sexual nature, including persistent or pervasive sexually explicit statements, questions, jokes, or anecdotes

### • Visual conduct:

- Leering, making sexual gestures, displaying of suggestive objects or pictures, cartoon or posters in a public space or forum
- Severe, persistent, or pervasive visual displays of suggestive, erotic, or degrading sexually oriented images that are not pedagogically appropriate

### Written conduct:

o letters, notes or electronic communications containing comments, words, or images described above

## • Quid pro quo conduct:

- O Direct propositions of a sexual nature between those for whom a power imbalance or supervisory or other authority relationship exists
- Offering employment benefits in exchange for sexual favors
- Making submission to sexual advances an actual or implied condition of employment, work status, promotion, grades, or letters of recommendation, including subtle pressure for sexual activity, an element of which may be repeated requests for private meetings with no academic or work purpose
- o Making or threatening reprisals after a negative response to sexual advances

#### 5. Effective Date

These Grievance Procedures replace any previous procedures addressing sexual and gender-based harassment and violence, and/or retaliation and will be reviewed and updated by the Title IX Coordinator. WMU reserves the right to make changes to this document as necessary to comply with the law and to align with best practices. Once those changes are posted online, they are in effect and the last revision date will be noted in the document.

### **PROGRAM**

The University has a comprehensive program for preventing and responding to sexual and gender-based misconduct. The four main components are described below.

## 1. Prevention, Education and Training

The University is committed to the prevention of sexual and gender-based harassment and violence, intimate partner violence, and stalking through education and awareness programs. The University is also committed to the protection of minors and the prevention of child abuse.



Throughout the year, the University offers educational programs to promote awareness of sexual and gender-based harassment and violence, intimate partner violence and stalking.

Prevention programs include an overview of the University's policies and procedures, relevant definitions, including prohibited conduct, discussion of the impact of alcohol and drug use, effective consent, safe and positive options for bystander intervention, and information about risk reduction. Incoming first year students and new employees are provided primary prevention and awareness programming as part of their orientation. The University's Title IX Coordinator oversees the education and prevention and tailors programming to campus needs and climate. All educational programs include a review of resources and reporting options available for students, faculty and staff.

The <u>Office of Health Promotion and Education</u> coordinates the following education opportunities regarding sexual and gender-based harassment and violence, intimate partner violence and stalking. The focus is on primary prevention, bystander intervention, and reporting/referral support.

- Theatre for Community Health offers applied theater performances and flash mob dances on topics including, but not limited to, relationships, alcohol and other drugs, dehumanization/violence prevention, consent, and bystander intervention.
- The Sexual Health Peer Education program offers presentations and awareness events on topics including, but not limited to, relationships, consent, and healthy communication.
- The FIRE (Fighting Ignorance and Rape through Education) peer education program offers presentations and awareness events on topics including relationships, consent, violence (including dating and domestic), stalking, sexual assault, sexual harassment, dehumanization, and bias incidents.
- The FIRE Place is a confidential support and resource center offering education, healing arts, resources, referrals, and reporting assistance for survivors and friends of survivors of sexual assault, sexual harassment, intimate partner violence, and any other form of bias incident.
- The Western HEROES program offers trainings on bystander intervention skills as they apply to the health and safety of the campus community on topics including, but not limited to, dehumanization, violence (dating, domestic, hazing), sexual harassment, relationships, alcohol and other drugs, and mental health.

### 2. Outreach

As part of the University's commitment to provide an educational and work environment free from sexual and gender-based harassment and violence, intimate partner violence and stalking, the Policy and Notice of Non-Discrimination are disseminated widely to the University community through email communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

### 3. Coordinated Response

The University shall have a Title IX Coordinator designated at all times. The President/BOT will designate/approve a Title IX Coordinator for the University. The Title IX Coordinator oversees the



University's centralized review, investigation, and resolution of reports of Covered Behavior to ensure the University's compliance with Title IX and the effective implementation of these Procedures. The Title IX Coordinator collaborates with campus and community partners on prevention and response strategy.

#### The Title IX Coordinator is:

- Responsible for overseeing investigations of sexual and gender-based harassment and violence, intimate partner violence or stalking involving all community members (student, faculty, staff, administrators, visitors and third parties)
- Responsible for monitoring and overseeing the University's compliance with Title IX and relevant VAWA provisions
- Knowledgeable and trained in University policies and procedures and relevant state and federal laws
- Available to advise any individual, including Complainant, Respondent or a third party, about the courses of action available at the University (both informal and formal) and in the community
- Responsible for overseeing and providing reasonably available Supportive Measures that
  protect Complainant and assure equal access to University programs and activities, including
  educational and employment opportunities
- Responsible for administering and communicating the grievance procedures
- Available to assist any University employee regarding how to respond appropriately to a Report
  of sexual or gender-based harassment or violence, intimate partner violence or stalking
- Responsible for monitoring full compliance with all procedural requirements, record keeping, and timeframes outlined in this Policy
- Responsible for coordinating and oversight of outreach education or training to increase awareness and prevention of sexual and gender-based harassment and violence, intimate partner violence and stalking throughout the campus community

When the Policy or Grievance Procedures refers to reporting to the Title IX Coordinator, those reports may also be made to those persons specifically designated by the University to receive such reports as the Title IX Coordinator's designee.

Title IX Coordinator Contact Information:

Felicia T. Crawford, Director Title IX Compliance

Postal Address: WMU Office of Institutional Equity, 1903 West Michigan Avenue Kalamazoo, MI

49008-5405

Campus Location: 1220 Trimpe Building

Email: felicia.crawford@wmich.edu, Telephone: (269) 387-6316

## 4. Timely Warning

WMU issues a timely warning for all Clery Act crimes (including sexual assault, domestic violence,



dating violence, and/or stalking) that occur on WMU's Clery Act geography that are reported to WMU Public Safety directly, by a Campus Security Authority, or a local police agency that in the judgment of the Director of Public Safety or their designee constitutes a serious or continuing threat. The timely warning is issued through <a href="WMU Alert">WMU Alert</a> or the University email system. The warning may also be posted on the GoWMU website as a campus announcement or in the Western Herald student newspaper. Complainant's name and other identifying information are withheld and remain confidential.