

## 1. Sexual Harassment Taskforce Recommendation Proposal

Title: Case Management System

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Sponsored by: Policies and Procedures Subcommittee: Joanne Yestramski (task force co-chair and subcommittee chair), Clara Reynolds (advisory), Annie Ciaraldi (advisory), A.J. Angulo, Patricia O'Brien, Hannah Casey, Megan Hadley, Javier Horta, Sue Kim, Sandra Niedergall, Katharine Webster

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Date Proposed: November 12, 2019

Recommended Action (Exact wording of the proposed recommendation):

To procure and implement a case management system for EOO matters (including sexual misconduct)

Summary of Principle Ideas and any Background that might help the Taskforce to better understand the Proposal:

Currently, EOO maintains hard copies of all cases and logs them in a spreadsheet. EOO will benefit from having a case management system to manage the cases. Having a robust system would allow the university to maintain all the documentation digitally; run reports; review trends; and verify the employees' disciplinary histories for the appropriate determination of sanctions.

Justification/Goals (What the proposal is trying to accomplish):

Increase efficiencies in the handling of cases and reporting.

Pros and Cons (Three possible benefits of the proposal and 3 possible drawbacks):

Pros: All EOO related matters would be maintained electronically in the same system (with separate levels for access and security within the various areas of HR EOO) which will provide easy access to related cases. Maintaining the files electronically will be efficient and free physical space. EOO would be able to run timely reports to identify and address trends.

Cons:

Cost of the system; time to implement (may take several months)

Alternatives to proposal:

Continue current process

\*Please attach any additional materials to this proposal if the space provided is not sufficient.

## 2. Changes in Title IX Guidelines, Policies and Procedures Under the New Regulations

Date Proposed: Nov. 15, 2019

Proposal Sponsored By: Policies and Procedures Subcommittee: Joanne Yestramski (task force co-chair and subcommittee chair), Clara Reynolds (advisory), Annie Ciaraldi (advisory), A.J. Angulo, Patricia O'Brien, Hannah Casey, Megan Hadley, Javier Horta, Sue Kim, Sandra Niedergall, Katharine Webster

Recommended Action:

UMass Lowell (and the UMass system) should consider adopting higher standards than those promulgated under the proposed Title IX regulations if that is allowed under the final regulations, with the review and approval of the UMass President's Office, the UMass general counsel and, where necessary because of a change in employment conditions, the university's eight employee unions, including:

- If the new guidelines say universities are not legally required to take action under Title IX unless the complaint is made to a Title IX official, but may use stricter standards, we recommend that the university continue to use the current, higher standard that says all non-confidential employees are required to report possible violations of Title IX, with the exception of transportation services drivers and non-managerial maintenance staff.
- The university should set up a well-publicized telephone hotline that goes directly to the responsible Title IX staff and allows for anonymous reporting. The university should also make sure that the hotline number and a "button" connecting people to the existing, anonymous web portal for Title IX and other bias complaints (the "bias incident report portal") are prominently displayed on the university website and through other media, such as on posters in residence halls, dining halls, libraries and throughout University Crossing. The university should commit resources and personnel to establishing, operating and publicizing the hotline and portal.
- If the new guidelines say that schools are only liable for behavior that occurs in places and contexts that they control, UMass Lowell – whether or not it is legally liable – should continue to vigorously investigate any Title IX complaints impacting the safety of the university community and/or a specific individual's ability to work or study here free of sexual harassment or gender-based discrimination.
- If the new guidelines give universities a choice of standards for deciding Title IX complaints, UML should continue to use the "preponderance of the evidence" standard (more likely than not), instead of the "clear and convincing evidence" standard.
- If the new regulations require hearing panels and an adversarial process for students, the university will work with the UMass system and the UMass counsel to constitute panels and create procedures for them. We recommend that, as the UMass system creates new policies and procedures, it commits resources to ensure that these panel members receive thorough and ongoing training in how to conduct hearings and come to a decision within the laws and regulations, while attempting to minimize additional trauma created by the adversarial process itself. We also recommend that the system consider providing trained advisors for such hearings if one party to the complaint has the financial ability to hire a lawyer and the other party does not, so that both parties have effective representation and advice.
- If the new regulations also require hearing panels and an adversarial process for employees, the same recommendations apply.

- We recommend that the university's Title IX professional staff, as they work with the UMass system and general counsel to figure out how best to implement the new guidelines, draw on the perspectives of the existing Title IX advisory committee or another advisory group, and consult with that group on how best to educate the campus community on the changes.
- We recommend that the campus undertake a major educational effort, including community and departmental meetings, to explain the changes to the policies and procedures and how they will affect different groups and individuals within the university community.

Summary of Principle Ideas and Any Background that Might Help the Taskforce to Better Understand the Proposal:

Nobody knows what the final guidelines from the U.S. Department of Education's Office of Civil Rights (DOE-OCR) will be, or exactly when they will come out. However, based on the proposed guidelines, lawyers with ATIXA and NCHERM anticipate that these will be some of the major changes, and we want the university to do as much as it can to continue moving in the direction of a more equitable, safe and inclusive educational and work environment within whatever framework the DOE-OCR creates.

Justification/Goals: To anticipate the new guidelines and make it clear that the university will do its best to create a safe and welcoming campus environment within the new legal framework, when we have choices. We also want to make sure that perspectives and ideas from different parts of the university, as represented on the Title IX advisory committee or another advisory group, are considered when the UMass system and UMass Lowell draw up, implement and educate the campus about the new policies and procedures.

Pros and Cons:

Pros: 1) An anonymous telephone hotline and web portal that are easy to find and use would reduce potential confusion and barriers to reporting Title IX violations, whether or not the new guidelines restrict reporting to a handful of Title IX professional staff. 2) Well-constituted and trained hearing panels could mitigate the chilling effect that the new guidelines are expected to have on reporting and proceeding through the Title IX review process. 3) Trained advocates could address the gross imbalance in financial resources between the parties, in the case of adversarial hearings.

Cons: 1) The new guidelines could be so restrictive that we will not be allowed to implement many of these suggestions. 2) Will require new resources and staff. 3) Some people do not trust that reporting is truly anonymous if technology is involved.

Alternatives to proposal:

For complainants and observers who are suspicious of being tracked by electronic technology, the Title IX office could set up drop boxes around campus for written sexual harassment and discrimination complaints.

3. Sexual Harassment Taskforce Recommendation Proposal

Date Proposed:

Proposal Sponsored By: (sponsoring subcommittee and list membership)

Policies & Procedures Subcommittee (AJ Angulo, Hannah Casey, Annie Ciaraldi, Megan Hadley, Javier Horta, Sue J. Kim, Sandra Niedergall, Patricia O'Brien, Clara Reynolds, Katharine Webster, Joanne Yestramski)

Recommended Action (Exact wording of the proposed recommendation):

Transferring authority to recommend sanctions to a panel of peers when faculty/staff are found responsible for Title IX violations.

Summary of Principle Ideas and any Background that might help the Taskforce to better understand the Proposal:

Please see attached materials (p.2) for principle ideas and background information

Justification/Goals (What the proposal is trying to accomplish):

The principle goal is to generate a greater sense of trust, credibility, and transparency in the sanctioning process while ensuring justice and equity remain present.

Pros and Cons (Three possible benefits of the proposal and 3 possible drawbacks):

Pros: More trust in the system, taking pressure off a single person and avoiding conflicts of interest, increases equity in outcomes  
Cons: Increases responsibility on faculty/staff, less efficient, confidentiality (*see attached for details*)

Alternatives to proposal:

Request additional information from the consultants on sanctioning models used at other institutions.

\*Please attach any additional materials to this proposal if the space provided is not sufficient.

## **Additional Materials**

### **Principle ideas:**

There is presently a loss of trust in the current model for disciplinary action when a faculty/staff member is found responsible of misconduct, and as a result of what we want to bring in a new system that allows for greater transparency and checks in decision making. The principle ideas are to promote greater degree of transparency, accountability, multiple perspectives in our process for recommending sanctions through the creation of panels.

The panels will draw from pool of diverse faculty and staff panelists will be assembled and trained on such topics as pertinent university policies and processes, Title IX, effect of certain misconduct on the campus, risks to community, sanctioning (including progressive sanctioning).

Once a Title IX investigation has been completed and an employee is found responsible of misconduct, a small panel of two or three will be called to review the facts of the case and determine the sanction recommendation. Panelists selected for a case must declare they have no conflict of interest. The panel must be provided an investigation report containing details gathered during the investigation to allow them to make an informed judgement. They will also be made aware of any previous sanctions against the employee in question. The recommendation will then be issued to the unit administrator.

### **Background:**

Other universities currently use small panel/committee of peers in their sanctioning procedures. Below are links to the related policies and a brief explanation of the parallels between their existing sanctioning process and our proposed process.

**(Public) University of California – Santa Cruz:** <https://apo.ucsc.edu/policy/capm/002.015.html>

- **UC Santa Cruz** has a “Committee on Charges” model for faculty violations. The committee is comprised of three faculty from their academic senate. In this case, the committee also conducts a probable cause investigation, but they do issue recommendations for disciplinary action as we are proposing.

**(Public) Michigan State University -** [https://www.hr.msu.edu/policies-procedures/faculty-academic-staff/faculty-handbook/tenure\\_discipline\\_dismissal.html](https://www.hr.msu.edu/policies-procedures/faculty-academic-staff/faculty-handbook/tenure_discipline_dismissal.html)

- **MSU** uses a three-person review panel after a faculty member has been found responsible of a code of conduct violation and the appropriate administrative officer is considering a severe sanction (reduction in appointment, suspension, etc.). After a meeting, the review panel will issue a sanction recommendation, either in agreement with the administrator’s intended sanction or a lesser sanction. While slightly different from our proposal, this is an example of a university using a panel of peers to recommend sanctions.

**(Public) Purdue University -** <https://www.purdue.edu/ethics/resources/resolving-complaints.php>

- **Purdue University** has an Advisory Committee on Equity composed of faculty and staff. Once the appropriate administrator received the investigation report, they are to seek advice for next steps from a three-member panel drawn from the Advisory Committee on Equity. The committee plays a role in determining if an employee should be found responsible. The sanctions are then imposed by the Chancellor or appropriate Dean and/or Director, depending on the campus, after receiving a determination of responsibility. While this process is not as focused on the panel’s involvement in the sanctioning, it does reflect a process where a panel issues recommendations to the appropriate administrator.

(Private) University of Southern California - <https://www.provost.usc.edu/report-on-faculty-sanctions-2018-2019/>

- **USC** recently moved toward a committee model for determining and implementation of sanctions, shifting decision-making from administrators to faculty peers. The spirit of our proposed process aligns with USC's model. Where we are restricted by needing the "employer" to implement sanctions, our process is a modification of USC's committee model where our panel would recommend appropriate sanctions.

Many of these models are specific to faculty, and the policy for staff sanctioning is not always clearly spelled out or presented along with faculty models. However, to ensure equity in the process, we are proposing this model is applied the same in the sanctioning process for both faculty and staff.

**Pros:**

1. **More trust in the system** – There is a present lack of trust in the faculty/staff process for sanctions. Under this process, multiple people are trained and impartial to the situation will be making the decision, hopefully allowing for greater trust to develop over time.
2. **Takes pressure off a single person and avoiding conflicts of interest** – A trained panel making the recommendations alleviates the pressure on a single individual feeling as though they must determine the sanction, who may have a friendly relationship with the person they are sanctioning. Those in the panel would be pre-screened for a potential conflict of interest. The panel could also determine the appropriate individual within a person's unit to issue the sanction and move up the chain of command if necessary, ensuring that administrator does not have a conflict of interest.
3. **Increases equity** – This proposal creates group trained people with diverse backgrounds to provide input instead of a unit's administrator, allowing for some consistency in who determines the recommended sanction.

**Cons:**

1. **Increases responsibility on faculty and staff** - A core group of faculty and staff would need time to be appropriately trained and commit the time necessary to participate in panels as needed. Participants will need to devote the time necessary to be on the panel for a particular case in a timely fashion.
2. **Less efficient** – A panel will be more time consuming both in the time necessary to train panelists and in the overall process from investigation to sanctioning. Some level of resources will be necessary to create and run the necessary trainings.
3. **Risk to confidentiality** – The more people involved, the greater the chance information spreads. Panelists will need to maintain confidentiality for all parties involved in the process.

Proposal Sponsored By: Policies and Procedures Subcommittee: Joanne Yestramski (task force co-chair and subcommittee chair), Clara Reynolds (advisory), Annie Ciaraldi (advisory), A.J. Angulo, Patricia O'Brien, Hannah Casey, Megan Hadley, Javier Horta, Sue Kim, Sandra Niedergall, Katharine Webster

Recommended Action:

Clarify the procedures for reviewing Title IX complaints and notifying the parties of the outcome:

- Clearly state in our policies and procedures that statements by the reporting party and the responding party in the Title IX complaint will be treated as relevant information and considered along with the totality of the information, documentation and witness statements offered to and gathered by EOO staff and used to determine whether the university's Title IX policies were violated.
- When the review has concluded, EOO's letter of notification to both parties, which is sent as an attachment to an email saying that the review has concluded, will include whether there was a finding of violation of the university's Title IX policies. The letter will also include: a declaration that witnesses provided by each of the parties were interviewed if they had knowledge relevant to the reported incident(s); a statement that EOO staff reviewed any documentation provided by the parties or gathered independently as part of the review; a statement that retaliation is prohibited; and a brief explanation of the appeal process, including the rights of the parties, the grounds for an appeal and the process for submitting an appeal. The letter will also state what the university is prohibited from disclosing under state and federal law.
- At the conclusion of the review, EOO will contact both parties by telephone and, if requested by any of the parties, registered mail to let them know the review of the complaint has concluded and that they have been sent an email with a letter describing the findings and their right to appeal, as well as the basis for any appeal. These phone calls and registered letters do not need to include disclosure of the findings. EOO will invite each party to contact the EOO office to schedule a meeting if they have any questions about the findings or a potential appeal. The parties are responsible for ensuring that EOO has their current email address, phone number and mailing address and for checking their email, voice mailboxes and mail. EOO will send the email notifications with requests for delivery and read receipts.
- The university will extend the appeal period from five calendar days to 10 calendar days from the date that the outcome letter is sent to the parties. If possible, the phone call should be made the same day or earlier.

Summary of Principle Ideas and Any Background that Might Help the Taskforce to Better Understand the Proposal:

Some people, especially students, do not check their email frequently, and they may miss the window for appeal as a result. Phone calls and registered letters will help ensure that both parties are aware of the results as soon as possible. Also, the new regulations may require a 10-day window for appeals.

While some of the items enumerated above are already included in the notification letter and email and the process for sending them, we would like to see a standardized process to disclose as much

information as possible to the parties within the confines of state and federal law, as well as a brief, plain-English explanation of the laws preventing the release of other information by the university. We are aware that state law governing public employees forbids the university to publicly release information about most personnel matters, including discipline. At the same time, FERPA prohibits disclosure of most student records. In Title IX cases, FERPA permits educational institutions to release the name of the person disciplined, the finding against them and the sanction; however, the UMass system has decided that the UMass campuses will not release this information.

#### Justification/Goals:

In order to restore the university community's confidence that sexual harassment and assault allegations are thoroughly and fairly reviewed and decided, we are advocating for as much transparency as possible, under current state and federal laws, about how evidence is treated and the basis for any findings. We also want the parties and the university community more generally to understand what the university cannot legally disclose, and why.

The proposed language would make it clear that a "word against word" situation does not mean that there will be no further investigation by Title IX staff. We want to assure all parties that their statements will be taken seriously, even if they do not have corroborating information or documentation. At the same time, we do not want EOO to be inundated with "character witnesses" who malign or praise either of the parties, but have no knowledge of the particular incident or pattern of behavior that has been reported.

We also want to ensure that all students and employees who are parties to Title IX reviews have adequate time to consider the findings before deciding whether they have grounds for an appeal. This is of particular concern when a complaint involves someone who may need help understanding the decision and their options. Examples include a person with emotional or intellectual disabilities or a person who does not speak English as their first language.

#### Pros and Cons:

Pros: 1) Provides some transparency about both the process and the outcome to the parties, which is critical to building confidence that the EOO process is both fair and thorough. 2) Gives the parties time to recover from the initial emotional reaction to an unfavorable finding and to seek help in understanding the appeal process before time bars them from filing an appeal. 3) Explains what information cannot or will not be released publicly by the university and why.

Cons: 1) Extending the appeals window would lengthen the process for both parties. 2) Could require more financial and staff resources for EOO.

#### Alternatives to proposal:

Leave the current procedures in place and review when the new guidelines come out.



## 5. Sexual Harassment Taskforce Recommendation Proposal

Title: Revision of language on anti-discrimination policies and procedures in all existing UML collective bargaining agreements.

Sponsored By: Policies & Procedures

Subcommittee Date Proposed:

11/15/2019

Recommended Action: Updating and unifying the current language contained among all eight collective bargaining agreements (CBAs) in existence at UML with respect to prohibition on discriminatory conduct.

Summary of Principal Ideas and any Background that might help the Taskforce to better understand the Proposal: There is inconsistent and in some instances outdated language in the various (eight) collective bargaining agreements between the university and its unions. Comparing the language on policies and procedures on anti-discrimination between all existing CBAs at UML reveals differences. The language should be consistent and current to ensure there are no disparities among the CBAs. The new adopted language should become standard for all existing and new CBAs moving forward.

Justification/Goals: To ensure complete equality among members of all CBAs at UML in terms of the anti-discrimination policies and procedures that apply to them.

## 6. Support for and Recommended Strengthening of the Proposed Consensual Amorous Relationship Policy

Date Proposed: Nov. 12, 2019

### Proposal Sponsored By:

Policies and Procedures Subcommittee: Joanne Yestramski (task force co-chair and subcommittee chair), Clara Reynolds (advisory), Annie Ciaraldi (advisory), A.J. Angulo, Patricia O'Brien, Hannah Casey, Megan Hadley, Javier Horta, Sue Kim, Sandra Niedergall, Katharine Webster

### Recommended Action:

We recommend that the university move as expeditiously as possible, with the unions, to adopt the proposed Consensual Amorous Relationship Policy. We further recommend that this policy be strengthened to strongly discourage any amorous (romantic, dating or sexual) relationship between 1) a faculty member and a student, and 2) a non-student staff member (professional staff) and a student, even where there is no "professional responsibility" – an advising, teaching, support, supervisory or similar relationship – on the part of the employee toward the student. The policy should also strongly encourage faculty or professional staff to disclose any such relationships with students to EOO.

We also recommend that the policy strongly discourage relationships between faculty and/or staff members within a department or business unit and strongly encourage disclosure to EOO if such a relationship exists, whether or not a "professional responsibility" exists between the two participants.

### Summary of Principle Ideas and any Background that Might Help the Taskforce to Better Understand the Proposal:

The proposed consensual amorous relationship policy, developed two years ago and now part of contract negotiations with the university's eight unions, is excellent in many ways and spells out the pitfalls for individuals and the wider harm to the university of amorous relationships between people with unequal power when there is a supervisory, teaching, advising, support or similar professional responsibility on the part of one toward the other. However, it does not adequately recognize the overall power differential between students and faculty or professional staff, or recognize the power that faculty and higher-level professional staff have over lower-level staff or adjunct, visiting and junior faculty within the same department or business unit, even when there is no direct "professional responsibility." Such relationships, whether disclosed or merely suspected, can also be highly detrimental to morale within the department or business unit because of concerns about favoritism, as well as to the university's reputation for safety and equity.

Justification/Goals: An outright ban on most amorous relationships between faculty or professional staff and students would be preferred by many members of the committee, similar to the amorous relationship policy adopted by Athletics to conform to NCAA requirements. However, because we are a public university, an absolute ban could potentially be challenged as a government action that abridges freedom of speech and association, in violation of the First Amendment to the U.S. Constitution. Under those constraints, we would like the language of the university-wide amorous relationship policy to make it very clear that such relationships are strongly discouraged and why, and that the university recommends that they be disclosed.

Disclosure gives EOO an opportunity to advise both parties to an amorous relationship about their respective rights and responsibilities, and also to make sure that no current or potential professional responsibility exists between the parties. Disclosure would not be absolutely required, and failure to disclose would not be punished, because we do not want to discourage people from reporting Title IX violations if a previously consensual amorous relationship becomes no longer mutual or consensual.

We would also like discussions of this policy and the problematic nature of amorous relationships between people holding unequal positions of power to be a major part of an ongoing information, education and training campaign, for example: during onboarding for new faculty, staff and students; department or business unit meetings; the required online annual trainings; trainings for newly promoted department chairs, deans, managers and administrators; and in-person training for existing faculty, staff and students.

Pros and Cons:

Pros: 1) Provides broader and better protection for students, non-tenured faculty and staff from unwelcome advances by tenured faculty and higher-level staff by recommending disclosure and clarifying community expectations about amorous relationships, even when no direct professional responsibility exists. 2) Clarifies that the university strongly discourages such relationships and the reasons why. 3) Disclosure gives EOO an opportunity to talk with both parties about the power differential and possible job or educational repercussions if the relationship becomes coercive or abusive (for example, a student is afraid to end a relationship with a faculty or professional staff member for fear of harm to their education, their relationships with other faculty/professional staff, and job and graduate school recommendations).

Cons: 1) The disclosure requirement could unfairly impact people who do not want to disclose their sexuality in their school or workplace, especially LGBTQ and non-binary people. 2) EOO will need more resources to handle disclosure. 3) The disclosure recommendation could inhibit relationships with a negligible power differential, for example between equal colleagues in the same department.

Alternatives to proposal:

Strongly discourage any amorous relationships between faculty or professional staff and students, as well as among faculty and staff within the same department or business unit, and **require** that any such relationships be reported to EOO. This should not violate the First Amendment, since amorous relationships are not banned, and the requirement that they be reported/disclosed to EOO is no different from ethical disclosures of potential and actual conflicts of interest required of state employees in other arenas. The University of Colorado, also a public university, has adopted a similar amorous relationship policy.

**Proposal Sponsored By: (sponsoring subcommittee and list membership)**

Policies & Procedures Subcommittee (AJ Angulo, Hannah Casey, Annie Ciaraldi, Megan Hadley, Javier Horta, Sue J. Kim, Sandra Niedergall, Patricia O'Brien, Clara Reynolds, Katharine Webster, Joanne Yestranski)

**Recommended Action (Exact wording of the proposed recommendation):**

We recommend a reevaluation, with broad input from the campus community, of EOO's resource allocations (including staff and budget), its physical space, and its administrative location within Human Resources.

**Summary of Principle Ideas and any Background that might help the Taskforce to better understand the Proposal:**

1) Resource allocations: Given the recommendations to be issued by the Sexual Harassment Task Force and the ensuing changes in the coming months, increasing the resources of EOO and Student Conduct offices will be essential. Additional personnel in EOO should ideally have a legal background, experience with Title IX, a counseling background, and experience with trauma-informed care.

2) Physical space: Currently, EOO is located physically within the HR offices. Although there is a separate entrance, many people do not realize this. EOO should ideally be located in a separate, more private location.

3) Administrative location: We recommend a reconsideration of the administrative location of EOO, given the high levels of distrust with the current configuration. The independence of EOO and Title IX are critical.

- Like many universities, UMass Lowell's EOO is administratively located within HR. This reflects the practice at three of the other UMass campuses (Amherst, Boston, and Dartmouth).
- But, as discussed in the article "The Problem With HR" (*The Atlantic*, July 2019; <https://www.theatlantic.com/magazine/archive/2019/07/hr-workplace-harrasment-metoo/590644/>), housing the office of EOO and Title IX within Human Resources presents a number of challenges. For instance, in the wake of public criticism about institutional responses to sexual harassment, the University of Michigan's Office for Institutional Equity (including Title IX coordinator) was moved out of HR and now reports directly to the Provost (Sept. 2019; <https://www.michigandaily.com/section/administration/seney-named-u-title-ix-coordinator-amongst-other-oie-changes>). At some institutions, the director of EOO is part of the Executive Cabinet (e.g. Cal State University San Marcos).
- Another model is one in which EOO, even if administratively housed within HR, reports its findings directly to Cabinet-level leadership (Vice Chancellor, Provost, or Chancellor), rather than through HR.
- Other universities have different configurations. For instance, at Clark University and Evergreen State College, EEO is within HR but Title IX is a separate, independent office that reports directly to the President/University leadership.
- Re-evaluation of EOO's administrative location could be done through an internal University task force/committee and/or an external consultant. An external consultant could avoid any potential or perceived conflicts of interest or bias. But if an external consultant is used, it should

not be the same consultant that was last used to evaluate EOO/HR's organization (which resulted in its current organization).

**Context:**

- UMass Lowell's EOO was separate from HR for many years, but – after evaluation and recommendation by a consultant – was incorporated into Human Resources several years ago.
- Currently, EOO has a dotted line report to Chancellor and/or UMass President's Office, to bypass current "chain of command" if/when necessary.
- Currently, any complaints involving members of the Executive Cabinet or the chain of command for the EOO/Title IX office go directly to the Chancellor, bypassing the Executive Cabinet and chain of command. Moreover, when needed, the University will hire outside parties to review complaints.

**Justification/Goals (What the proposal is trying to accomplish):**

This proposal seeks to provide the resources, physical location, and administrative structure that will best enable the EOO office and Title IX coordinator to meet its goals of protecting every member of the UMass Lowell community and promoting trust in our processes.

**Pros and Cons (Three possible benefits of the proposal and 3 possible drawbacks):**

**Pros:**

- Sufficient resources for EOO to meet the various needs of the community
- Greater privacy and accessibility for reporting parties
- Potential for greater confidence in the fairness of the reporting and review process for complaints about employees

**Cons:**

- Limited resources (including space)
- Administrative relocation may be a complicated process
- May include less information-sharing between EOO and HR about prior problem reports that may not have risen to the level of an EOO complaint, but that show a pattern of behavior or an escalation in the offensive behavior. Referrals also come to EOO from HR. However, this could be addressed structurally through a regular schedule of planned information-sharing meetings.

**Alternatives to proposal:**

\*Please attach any additional materials to this proposal if the space provided is not sufficient.