

OFFICE FOR EQUITY & COMPLIANCE

Title IX Compliance & Comprehensive Policy Training

Campus Partners (Comprehensive Policy Administrators)

March 21, 2025



Welcome & Introductory Remarks

TIM LOVE

Executive Director & Title IX Coordinator

Advocacy & Trauma-Informed Care

MIRA KRIVOSHEY

Director of Health Promotions

SAM HAMMETT

Violence Prevention & Advocacy Specialist

ADVOCACY AT LOYOLA

LUC'S CONFIDENTIAL HOTLINE FOR RESOURCES AND SUPPORT RELATED TO GENDER-BASED VIOLENCE

THE LINE

- M-F 8:30am-5pm, 24 hours on the weekend (when school is in session)
- Staffed by highly trained advocates
 - Support and safety planning
 - Some supportive measures and assistance in reporting
 - Medical/Mental Health referrals
 - Legal/criminal resources
- Available to anyone in LUC community, undergraduates, graduate students



WHAT MAKES ADVOCACY UNIQUE?

- The LINE and all of its advocates are **confidential**
- Specialized skills/training
- On- and off-campus resources
- The LINE's agenda is the survivor's agenda**

WHAT IS TRAUMA?

- A person's ability to cope becomes overwhelmed
- Individual
- Can be the result of a one-time event or repeated occurrences

TRAUMA AFFECTS:

- Behavioral response
- Memory
- Decision-making

HOW TO BE TRAUMA-INFORMED DURING THE TITLE IX PROCESS

- Whenever possible, give agency to the parties
- Don't interrupt narrative answers
- Remember how trauma affects memory
- Communicate clearly, concisely, without jargon

Trauma-informed does not equal trauma-free

Intake Meetings

SAMANTHA MAHER SHEAHAN

Associate Dean of the Dean of Students

ASHONDA WALKER

Paralegal & Case Manager

A background image showing a person's hands writing in a notebook with a pen. The image is partially obscured by a white diagonal shape on the right side.

Key Principles of an Intake Meeting

EMPATHY & CARE

Prioritize a trauma-informed approach to ensure the AP feels safe, comfortable, and empowered. Use a calm, warm tone and maintain open body language.

- **Non-Judgmental Listening**
- **Reassurance and Control**

CLEAR COMMUNICATION

Ensure the AP leaves the meeting fully informed about their rights, options, and the university's commitment to their safety, privacy, and protection from retaliation.

- **Clear, Gentle Language**

SUPPORTIVE ENVIRONMENT

Conduct the intake in a way that provides clarity and reassurance, allowing the AP to make decisions based on their preferences and needs.

- **Validation & Support**



Elements/ Structure

Of an Intake Meeting

INTRODUCTION

- *Case Manager/Office role*
- *Establish needs of party*

CLARIFICATION OF KEY CONCEPTS & RIGHTS

- *Explanation of rights*
- *Advisor/Advocate role*

IMPACT & SUPPORT

- *Discussion of supportive measures*
- *Discuss incident/experience impact on party*

DISCUSSING ACCOUNTABILITY & OPTIONS

- *Provide information about resolution options*
- *Assuring party to utilize their autonomy*
- *Relative policy overview*

SUPPORTIVE MEASURES



Schedule
Changes



Academic/
Workplace
Support



Housing
Adjustments



No Contact
Directives



Counseling,
Medical Care,
& EAP

Resourcing Document

March 21, 2025

[Affected Party's Name]

Sent electronically to affectedparty@LUC.edu

Dear Affected Party,

I hope this message finds you well. My name is [Case Manager's name], {Case Manager's title and specified office] at Loyola University Chicago. This message is regarding a report or referral that was received by our office. The Office for Equity & Compliance ("OEC") and Office of the Dean of Students ("ODOS") work together to address discrimination, sexual misconduct (including but not limited to Title IX matters), and retaliation involving LUC students.

According to a report we received, you may have experienced sexual misconduct.

Loyola takes all such reports very seriously, as student safety and well-being are of the utmost concern to us. As a reported "affected party", you have certain rights, resources, and options available through the University. Below my signature, you will find additional information that may be relevant to the reported circumstances. (You are under no obligation to engage any of these resources, but I want to be sure you are aware that support is always available.)

Based on the information that was reported, it is very important that we meet to discuss this matter as soon as possible. Please reply and indicate a few dates/times in the near future that would work with your schedule. Meetings can be arranged in person at any of Loyola's campuses or via Zoom. If you prefer to meet with someone else in the OEC or ODOS, I could put you in touch with a different colleague in either office instead, but it is important that you schedule an intake meeting as soon as possible.

What to Expect at an Intake Meeting - Intake meetings are primarily informational and not investigatory in nature. During the meeting a staff member will review applicable policies, procedures, and resources to ensure your safety and rights are protected and will address any questions that you may have. The meeting may also serve to connect you with support/advocacy resources on- and/or off-campus, which are available to you. You will never be forced or compelled to engage law enforcement about any matter, but...

RESOURCES FOR STUDENTS: SEXUAL MISCONDUCT

All Loyola students have a right to be free from all forms of sexual and gender-based misconduct in the University community. Loyola takes seriously its obligation to provide an academic environment free from such misconduct and will provide appropriate support upon notice/request. The information below is intended to provide notice of various rights and resources to parties who may be affected by such conduct. If you have any questions or are seeking information regarding resources not referenced below, please contact the Office for Equity & Compliance ("OEC") and one of our staff will be happy to assist you further.

Loyola's Relevant Policies for Students

Comprehensive Policy and Procedures for Addressing Discrimination, Sexual Misconduct, and Retaliation

- Applicable to students, faculty, and staff
- Contains the University's policies addressing discrimination and sexual misconduct, including Title IX matters
- [LUC.edu/comprehensivepolicy](https://luc.edu/comprehensivepolicy)

Community Standards

- Applicable to students only
- In particular, see Article V, "Title IX Notification and Sexual Misconduct Under the Comprehensive Policy"
- [LUC.edu/communitystandards](https://luc.edu/communitystandards)

*Other contracts, collective bargaining agreements, and policies may also apply.

Title IX

Title IX is a federal law that explicitly prohibits discrimination based on sex by any institution of higher education that receives federal funds (which includes Loyola). Under Title IX, certain types of sexual harassment, when occurring within the United States and within the University's education programs or activities, constitute a form of prohibited sex discrimination.

Title IX requires a specific grievance process for complaints of Title IX sexual harassment, as distinct from other forms of Title IX sex discrimination and other forms of sexual harassment. Every educational institution receiving federal financial assistance must designate a "Title IX Coordinator" to carry out the institution's obligations under Title IX. At Loyola, the Executive Director of the OEC is the Title IX Coordinator and is assisted in this function by several Deputy Title IX Coordinators.

Any person may report Title IX sex discrimination, including Title IX sexual harassment (whether or not the person reporting is the affected party), via the publicly available online reporting form available at [LUC.edu/equity](https://luc.edu/equity); in person; by mail, telephone, or email (see contact information below); or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the online reporting form or other contact information provided.

Inquiries about Title IX at Loyola, or reports or complaints of any alleged Title IX violation may be directed internally to:

Title IX Coordinator

Timothy Love, Executive Director for Equity & Compliance
Office for Equity & Compliance
Granada Center 4th Floor, 6439 N. Sheridan Rd., Chicago, IL 60626
office (773) 508-7766 | direct (773) 508-3733 | email: tlove@LUC.edu

Contact Information for Other OEC Staff

Ashonda Walker, Case Manager/Paralegal	773-508-3731	awalker5@LUC.edu
Nika Arzoumanian, Deputy Title IX Coordinator/Equity Investigator	773-508-3784	narzoumanian@LUC.edu
Megan Tobin, Deputy Title IX Coordinator/Equity Investigator	773-508-3781	mtobin8@LUC.edu
Karolina Bartosik, Deputy Title IX Coordinator/Equity Investigator	773-508-8694	kbartosik@LUC.edu

Title IX Investigations

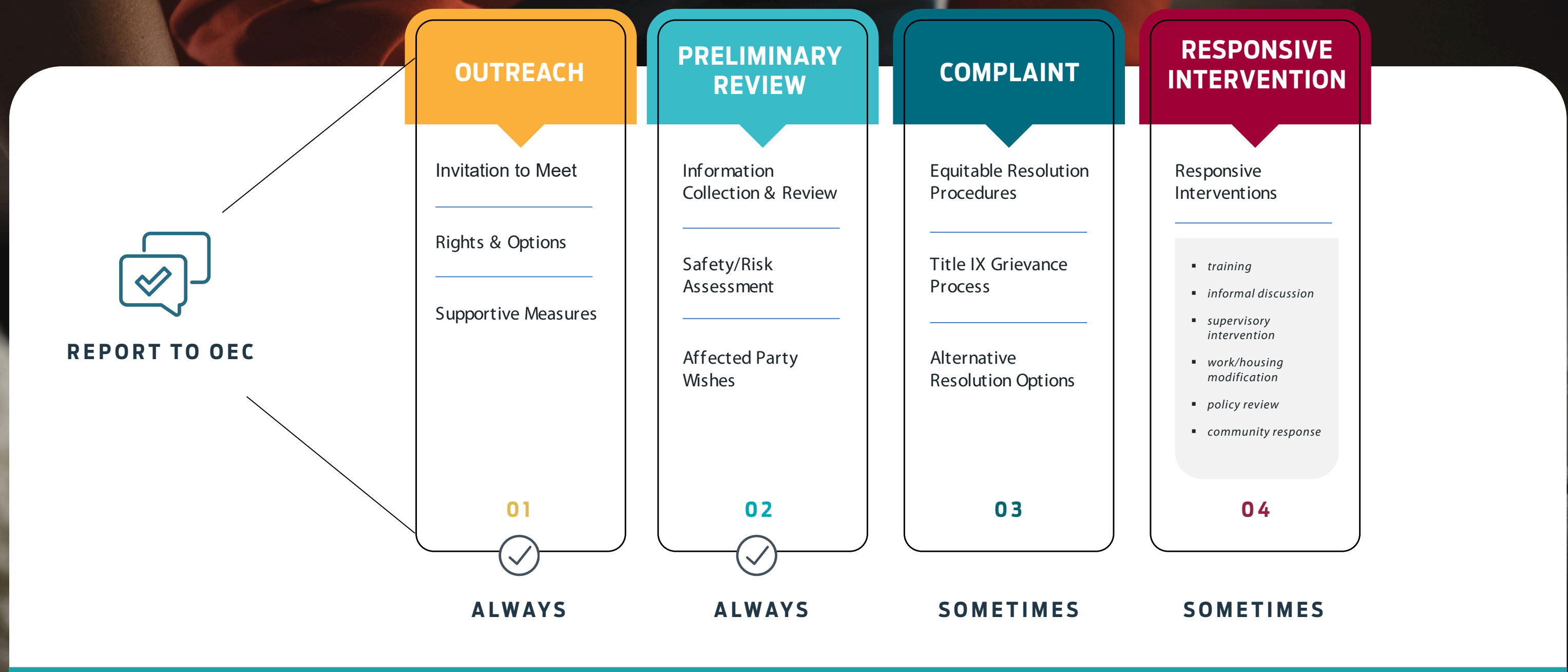
KAROLINA BARTOSIK

*Equity Investigator & Deputy Title IX
Coordinator, OEC*

MEGHAN TOBIN

*Equity Investigator & Deputy Title IX
Coordinator, OEC*

THE OEC RESPONDS TO **EVERY REPORT** AND **EVERY COMPLAINT**

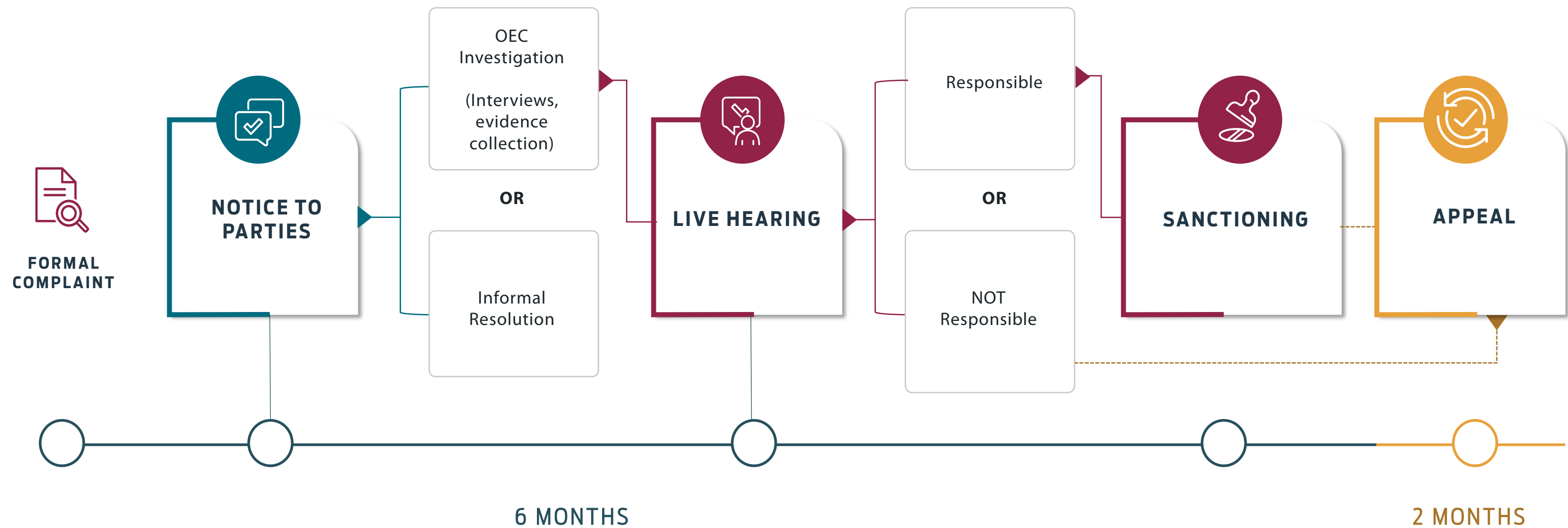


Office for Equity & Compliance

To view the Comprehensive Policy or speak with an OEC team member about submitting a report, visit [LUC.edu/equity](https://luc.edu/equity).

GRIEVANCE PROCESS

For Title IX Sexual Harassment





Multi-Partiality, Supportive Measures, & Privacy Considerations

Investigation Reports

1

INVESTIGATION REPORT FOR PRELIMINARY INSPECTION AND REVIEW

CONFIDENTIAL

Grievance Process Complaint #XXX

Office for Equity & Compliance
Loyola University Chicago

Investigator: NAME, Deputy Title IX Coordinator & Equity Investigator

Date of Report: XXX

This report is private and intended for the recipients only. It contains sensitive information pertaining to the recipient and other persons. Recipients should avoid further disclosure of the information to persons who are not in a need-to-know position to respect the rights and interests of those persons mentioned in the report, to maintain the integrity of the University's non-discrimination and harassment policies and procedures, and to minimize disruption to the workplace and educational environment.

Furthermore, when viewing this report remotely, the report (and corresponding investigation file) may not be downloaded, printed, duplicated, recorded, or otherwise captured (e.g., screen shot, photographed) in any way by any party (or advisor, as applicable). Every report shared with a party will be individually watermarked; any party found to have retained and/or disseminated a report or a portion thereof (with anyone other than an advisor, as applicable) may be subject to disciplinary action. Parties may be held responsible for the retention or dissemination of a report or portion of a report by any advisor not affiliated with the University.

Any party requiring assistance with remote report viewing is welcome to contact the investigator directly.

1

Final Investigation Report

CONFIDENTIAL

Grievance Process Complaint #XXX

Office for Equity & Compliance
Loyola University Chicago

Investigator: NAME, Deputy Title IX Coordinator & Equity Investigator

Date of Report: XXX

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Any party requiring assistance with remote report viewing is welcome to contact the investigator directly.

Hearings



JAE JOSEPH

Assistant Dean of Students

WILLIE GORE

Assistant Dean of Students

HEARING PROCESS

- **Pre-Hearing Conference**
 - Optional and offered to both parties + their advisors
 - Held separately (Complainant + Complainant's advisor and Respondent + Respondent's advisor)
 - Review Hearing Rules & Procedures
 - Opportunity for questions about the hearing format
 - Discussion about witnesses the primary party wants to be called
 - Offer for the primary party to email their questions to the Board Chair in advance of the hearing for review/approval
- **Facilitated in Person-Centered Way**
 - Caring, sensitive, trauma-informed, unbiased
- **Live, Remote Format**
 - Held via Zoom
 - Title IX Coordinator facilitates technology and serves as liaison between the Hearing Board and the primary parties, advisors, and witnesses

HEARING PROCESS

- **Individuals Present**
 - Complainant & Complainant's Advisor
 - Respondent & Respondent's Advisor
 - Hearing Board
 - Typically 2-3 staff members from the SRCR Team when the Respondent is a student
 - Title IX Coordinator
 - Investigator, if called for questioning by the Board
 - Witnesses, if called for questioning by the Board and/or any primary party

OVERVIEW OF HEARING BOARD ROLE

PRE-HEARING

- Investigation Report
- Prepare Script and Questions
- Board Chair Co-Hosts Pre-Hearing Conference with TIX Coordinator

HEARING

- Direct Questioning of Both Primary Parties
- Facilitate Cross-Examination
 - Board Chair determines relevance of each question asked prior to an answer being given.
- Maintain Order and Decorum
 - Board Chair enforces Hearing Rules & Procedures

WRITTEN DETERMINATION

- Follow Department of Education Requirements for Format
- Unbiased Evaluation
- Complainant Remedies
- Respondent Sanctions (if applicable)
- Appeal Options
 - Either party may appeal

OVERVIEW OF ADVISOR ROLE

PRE-HEARING

- Investigation Report
- Meet with Your Party
- Decide/Discuss:
 - Witnesses to request
 - Questions the party wants to ask the other primary party and any witnesses
 - Your party's closing statement
- Discuss Hearing Rules & Procedures
- Attend the Pre-Hearing Conference

HEARING

- Support Your Party
- Present Your Party's Questions to:
 - Other Primary Party
 - Witnesses
- Follow the Hearing Rules & Procedures
- Consult with Your Party in Private if Requested

POST-HEARING

- Check In with Your Party
- Offer to Meet after the Written Determination is Delivered

Note: The Title IX Coordinator is also present throughout the hearing to oversee technology and logistics, and to field any compliance-related questions from the Board.

HEARING FORMAT

- **Introductions**
 - Reminders: recording, breaks can be requested by either primary party, camera on, mic muted unless speaking, in a private space with no other person present
 - Review of Hearing Rules & Procedures
- **Overview of Allegations**
- **Questioning Order**
 - Generally, the order is Complainant, Respondent, Witnesses but this sometimes changes based on Witness availability
- **Direct Questioning by Hearing Board**
- **Cross-Examination**
 - Board Chair must approve the relevance of each question before it is answered
 - Impermissible Questions: Legally privileged information, disrupts order & decorum, Complainant's past sexual history or sexual proclivities (unless sought to prove (a) someone other than Respondent engaged in alleged behavior or (b) consent was given for the alleged behavior).
- **Closing Statements**
 - Optional for Complainant and Respondent
 - Cannot exceed 10 minutes
 - Must be directed to the Board and not to any other person

Title IX Grievance Process Appeals

WILL RODRIGUEZ

Dean of the Dean of Students



Appeals under Title IX

- Law requires that both parties (complainant and respondent) have right to appeal, regardless of outcome (*responsible or not responsible*)
- Appeal information provided in writing with the written determination
 - Appeals must be requested within 10 business days of written determination letter date
- Appeal requests are initially reviewed for eligibility (timeliness, grounds)
- Other party is given opportunity (10 days) to respond
- All appeal materials then provided to appeal administrator(s)



Appeals under Title IX...at Loyola

- Assignment of appeal administrator(s) will vary depending on classification of respondent (faculty, student, staff)
- Exact workflow/communication will also vary, as Comprehensive Policy integrates other University appeal processes
 - Student appeals – managed by OEC, with appeal administrator(s) from DSD or SAS
 - Faculty appeals – follow Faculty Handbook or CBA
 - Staff appeals – follow Staff Handbook or CBA



Appeals
are **NOT**...

- ✘ An opportunity to re-do/re-investigate the case
- ✘ A re-hearing or an opportunity to re-argue or continue the argument phase of the process
- ✘ An opportunity to argue for a less harsh or different sanction based solely on the impact of the sanctions on the respondent
- ✘ A legal proceeding




Appeals ARE...

- ✓ An opportunity to *internally* review a case before it is finally resolved, to ensure that policies and processes were followed such that the University can stand confident in the outcome(s)
- ✓ A review of the case based **only** on specified appeal grounds (provided on next slides)
- ✓ An opportunity to address/fix any error(s) under any of the appeal grounds – **even if the appealing party did not specifically argue it in their appeal request**
- ✓ Deferential to the original decision (i.e., any changes require a “clear error and compelling justification”)




Appeal Grounds (required by Title IX)

- ▶ A **procedural irregularity** that **affected the outcome**
- ▶ **New evidence**, that was **not reasonably available** at the time of the determination...that **could affect the outcome of the matter**
- ▶ The EDEC, investigator(s), or hearing administrator(s) had a **conflict of interest or bias** for or against complainants or respondents generally or the individual complainant or respondent that **affected the outcome** of the matter



Additional Appeal Grounds (available to both parties, in the following circumstances)

- In cases involving student respondents (only), both parties may also appeal on the grounds that the sanction or sanctions are **disproportionate** to the violation(s). (*required under Illinois law*)
- In cases involving faculty respondents (only), both parties may also appeal on any applicable grounds as described in the **Faculty Handbook**.
- In cases involving unionized staff respondents (only), both parties may also appeal on any applicable grounds as described in the **applicable collective bargaining agreement**.



Appeal Administrator Options (all are optional, and not required in all cases)

- Request to review specific documents
- Request a report on similar prior cases and their outcomes to assess consistency with precedent
- Consult with OEC on administrative questions
- Meet/speak with parties (if meeting with one, will also meet with the other for equity/fairness)



Possible Appeal Outcomes

- Appeal granted, **original decision overturned** (“responsible” becomes “not responsible” or vice versa)
- Appeal granted, **original decision modified** (adjusted findings or sanctions)
- Appeal granted, **case remanded** to remedy an error (e.g., for more investigation, further deliberation, etc.; if based on *bias*, may require reassignment to different personnel)
- Appeal denied, **original decision upheld** (findings and sanctions, if applicable)

All appeal decisions are final and not subject to further review within the University



Q&A Closing Remarks

SAM MAHER SHEAHAN

Associate Dean of the Dean of Students