

## **JOHN CARROLL UNIVERSITY SEXUAL HARASSMENT and INTERPERSONAL VIOLENCE POLICY**

### **I. TITLE IX NOTICE OF NONDISCRIMINATION**

Title IX of the Education Amendments of 1972 protects individuals from discrimination based on sex/gender in any educational program or activity operated by recipients of federal financial assistance. Sexual harassment, which includes acts of sexual and interpersonal violence, is a form of sex discrimination prohibited by Title IX, as well as Title VII of the Civil Rights Act of 1964, as amended. John Carroll University does not discriminate on the basis of sex in employment, or in educational programs and activities that it operates.

John Carroll University has appointed a Title IX Coordinator to oversee the University's response to Title IX complaints, develop training and education programs/materials for faculty, staff and students, as well as monitor trends and effectiveness of the University's Title IX educational efforts. Questions regarding Title IX should be referred to:

Kendra Svilar, Title IX Coordinator  
John Carroll University  
Administration Bldg. Room 130D  
1 John Carroll Blvd.  
University Heights, OH 44118  
(216) 397-1559  
[ksvilar@jcu.edu](mailto:ksvilar@jcu.edu)

Additional information and questions regarding Title IX also may be referred to the U.S. Department of Education's Office for Civil Rights by contacting 1-800-421-3481 or [OCR@ed.gov](mailto:OCR@ed.gov).

### **II. PURPOSE:**

John Carroll University seeks to provide a community for faculty, staff and students that promotes personal growth and development in a safe and welcoming environment. The University is committed to the belief that respect for the rights and dignity of all people must be protected. This goal is an integral part of all aspects of University life, rooted in our Jesuit Catholic identity, and is essential to our academic community. The purpose of this policy is to help ensure that John Carroll University provides an environment free from acts of sexual harassment and interpersonal violence for all members of the community. The policy defines sexual harassment and interpersonal violence, which are subject to resolution using the University's Title IX Complaint Resolution Process.

### **III. SCOPE:**

This policy applies to all students, faculty, staff, and volunteers – whether full-time or part-time; vendors; contractors; visitors; and guests, whether the behavior(s) took place on University property, online, or at off-campus University-related programs, activities or events, including,

but not limited to, study abroad programs, internships and immersion experiences. This policy also applies to any off-campus conduct and to actions online that affect a substantial University interest. A “substantial University interest” is defined to include any one or more of the following:

- A. Any action that constitutes a criminal offense as defined by federal, state, or local law whether the action takes place on the University’s property or elsewhere;
- B. Any situation in which it appears that the responding party may present a danger or threat to the health or safety of others;
- C. Any situation that significantly impinges upon the rights, property or learning opportunities of a University community member or members or significantly breaches the peace and/or causes social disorder;
- D. Any behaviors that occur off University property that cause a substantial on-campus disruption;
- E. Any situation that is detrimental to the educational interests or mission of the University; and/or
- F. Any online postings or other electronic communication, including cyber-bullying, cyber-stalking, cyber-harassment, etc., including those occurring outside of the University’s control (e.g., not on University networks, websites or between University email accounts) when those online behaviors cause or have the potential to cause a substantial on-campus disruption.

**IV. DEFINITIONS:**

- (A) “Deputy Title IX Coordinator”: a University employee who has been assigned the responsibility of receiving reports and complaints of sexual harassment and sexual discrimination falling under Title IX.
- (B) “Reporting Party”: the recipient of the behavior who claims that this policy has been violated.
- (C) “Responding Party”: the person or entity accused of violating this policy.
- (D) “Responsible Employee”: any University employee who meets at least one of the following criteria: (1) has the authority to take action to redress sexual harassment violence or other sexual misconduct; (2) has been given a duty of reporting incidents of sexual harassment or other sexual misconduct to the Title IX Coordinator or a Deputy Title IX Coordinator; or (3) is an employee whom an individual could reasonably believe has the above authority or duty. Under the University’s Mandatory Reporting Policy, **all** University employees are deemed Responsible Employees with a mandated responsibility to report incidents related to Sexual Harassment or Interpersonal Violence, except for these professionals acting in their capacity: doctors; nurses acting under the direction of a doctor; licensed counselors; or ordained members of the clergy.

(E) “Third Party Reporter”: any person who was not the recipient of the behavior and reports an incident. This can include witnesses or Responsible Employee reporters.

(F) “Title IX Coordinator”: the University employee having primary responsibility for tracking and overseeing reports and complaints of sex discrimination and sexual harassment falling under Title IX.

**V. POLICY ON SEXUAL HARASSMENT AND INTERPERSONAL VIOLENCE:**

A. Policy Statement

Students, staff and faculty are entitled to a working environment and educational environment free of discriminatory harassment. Sexual harassment, which includes acts of sexual or interpersonal violence, is a type of sex discrimination. Sexual harassment and interpersonal violence violate basic human dignity and impede the fundamental mission of the University. In keeping with its commitment to social justice and the basic dignity of all persons, John Carroll University condemns and will not tolerate acts of sexual harassment or interpersonal violence on University property or at locations off University property, including University-sponsored or University-related programs, activities and events.

Therefore, any member of the campus community, guest or visitor who acts to deny, deprive or limit the educational, employment, residential and/or social access benefits or opportunities of any member of the University community on the basis of sex/gender or an act of interpersonal violence is in violation of this policy.

This policy is subject to resolution using the University’s Title IX Complaint Process. When brought to the attention of the University, any such discrimination will be appropriately remedied by the University according to the procedures outlined in the Title IX Complaint Resolution Process. The University’s response will be to act to end the discrimination, prevent its recurrence, and remedy the effects on both the individuals and the University community.

This policy shall serve as the only internal University forum of resolution and appeal of sexual harassment and interpersonal violence reports.

B. Academic Freedom

The University’s policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include relevant, but controversial or sensitive, subject matters protected by academic freedom. Each faculty member may consider in classes any topic relevant to the subject matter of the course as defined by the department or academic dean. Classroom topics also must be in balance with the rights of others not to be sexually harassed and conducted in accord with the norms of the discipline. If there are questions about whether the course material or the manner in which it is presented falls within the definition of sexual harassment, the concerned party should contact the Title IX Coordinator or Designated Deputy Title IX Coordinator.

C. Discriminatory Harassment

Sexual harassment, sexual misconduct, and interpersonal violence are forms of discriminatory harassment and are prohibited by this policy. Acts of sexual harassment, sexual misconduct and interpersonal violence may be committed by any person upon any other person, regardless of the sex, gender or sexual orientation of those involved.

Acts may include name-calling, graphic or written statements (including the use of cell phones or the Internet), or other conduct that may be physically threatening, harmful, or humiliating. Such harassment does not have to include intent to harm, be directed at a specific target, or involve repeated incidents.

Acts of Sexual Harassment and Interpersonal Violence violate this policy when they create a hostile environment, as defined in Section V(D)(2) below. However, the University will remedy all forms of sexual harassment and interpersonal violence when reported, whether or not the harassment rises to the level of creating a hostile environment.

Harassment that does not rise to the level of creating a hostile environment may be addressed through respectful conversation, remedial actions, education or conflict resolution. For further assistance with these options, please contact the Title IX Coordinator.

D. Sexual Harassment

Sexual Harassment is defined as:

Any unwelcome verbal, written, pictorial, online and/or physical conduct that is based on sex and/or gender or that is sexual in nature. Forms of Sexual Harassment that are prohibited by this policy include *Quid Pro Quo* Sexual Harassment and Hostile Environment Sexual Harassment.

(1) *Quid Pro Quo* Sexual Harassment:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature by a person having power or authority over another when submission to such conduct is made either explicitly or implicitly a term or condition of employment, educational benefits, academic grades or opportunities, living environment or participation in a University activity.

(2) Hostile Environment Sexual Harassment

Any unwelcome verbal, written, pictorial, online and/or physical conduct that is based on sex and/or gender or is sexual in nature that:

- a. is sufficiently serious (i.e., severe, pervasive, or persistent) and objectively offensive so as to deny or limit a person's ability to participate in or benefit from the University's programs, services, opportunities, or activities; or

- b. when such conduct has the purpose or effect of unreasonably interfering with an individual's employment or educational experience.

A hostile environment can be created by anyone involved in a University program or activity (e.g., staff, faculty members, students, campus visitors or guests). Mere offensiveness is not enough to create a hostile environment. Although repeated incidents increase the likelihood that harassment has created a hostile environment, a serious incident, such as non-consensual sexual intercourse or non-consensual sexual touching, even if isolated, can be sufficient.

E. Sexual Misconduct

The University considers Non-Consensual Sexual Intercourse violations, including but not limited to forced sexual intercourse, to be the most serious form of Sexual Misconduct, and therefore typically imposes the most severe sanctions on such violations, including suspension or expulsion for students and termination for employees. However, the University reserves the right to impose any level of sanction, ranging from a reprimand up to and including suspension or expulsion/termination for any act of sexual misconduct, interpersonal violence or other gender-based offenses including relationship (dating and/or domestic) violence, non-consensual sexual contact and/or stalking, based on the facts and circumstances of the particular allegation.

1. Sexual Misconduct Violations

Sexual misconduct in violation of this policy includes the following:

- a. The two types of sexual harassment described in Section V.D.1 and 2 above.
- b. Non-Consensual Sexual Intercourse: Any sexual penetration (anal, oral or vaginal), however slight, with any object or body part, by any person upon any other person, without consent.

c. Forced Sexual Intercourse:

Any sexual penetration (anal, oral or vaginal), by any object or body part, by a person upon any other person, that occurs as a result of physical force.

d. Non-Consensual Sexual Contact:

Any unwelcome intentional sexual touching.

This includes any contact with the breasts, buttocks, groin, genitals, mouth or other bodily orifice of another, as well as the touching of another with any of these body parts, by a person upon any other person, without consent.

e. Sexual Exploitation:

Taking non-consensual or abusive sexual advantage of another for one's own advantage or benefit, regardless of whether such behavior constitutes one of the other sexual misconduct offenses. Examples include, but are not limited to:

- i. Non-consensual recording: Non-consensual digital, video or audio recording of sexual activity or nakedness (full or partial). This includes the unauthorized sharing or distribution of digital, video or audio recording of sexual activity or nakedness (full or partial).
- ii. Compelling Prostitution: Forcing or inducing another individual to engage in sexual activity for hire.
- iii. Voyeurism: Engaging in secretive observation of another for personal sexual pleasure or engages in nonconsensual video or audio recording of sexual acts or nakedness. This behavior is a form of sexual misconduct and violates the dignity of the affected party(ies), even if the person secretly viewed or recorded may be unaware of the observation or recording.
- iv. Exposure: Disrobing or exposure of one's breasts, buttocks, groin or genitals without the consent of the other person, or inducing another to disrobe or to expose their breasts, buttocks, groin or genitals to another person without their consent.
- v. Administering alcohol/drugs: Administering alcohol or drugs to another person without their knowledge or consent in an attempt to facilitate sexual contact.

2. Interpersonal Violence Violations

Interpersonal Violence is when one person exerts power and control over another through physical, sexual, or emotional threats or actions, economic control, isolation, or other kinds of coercive behavior. Some different types of interpersonal violence prohibited by this policy include:

- a. Threats or Causing Physical Harm/Abuse: Threatening or causing physical harm, extreme verbal abuse or other conduct which threatens or endangers the health or safety of any person on the basis of sex/gender or is associated with an act of interpersonal violence.

b. Intimidation: implied threats or acts that cause an unreasonable fear of harm in another on the basis of sex/gender or are associated with an act of interpersonal violence.

c. Hazing: any planned/executed action or activity, based on sex or gender, by or against an active member, associate member, new member, pledge or potential member of an organization or group that inflicts physical or mental harm, distress, anxiety, or which may demean, degrade, embarrass or disgrace any person, regardless of location, consent or intention of participants, is prohibited. Hazing that falls outside this policy (i.e., is not based on sex/gender or an act of interpersonal violence) may nonetheless violate other University policies.

d. Bullying: repeated, severe, and/or aggressive behavior likely to intimidate or intentionally hurt, control or diminish another person, physically or mentally on the basis of actual or perceived sex and/or gender. Bullying that falls outside this policy (i.e., is not based on sex/gender or an act of interpersonal violence) may nonetheless violate other University policies.

e. Relationship Violence: behavior used to establish power and control over another individual using fear, intimidation, violence and/or threat of physical violence. These behaviors can include, but are not limited to, physical, verbal, emotional, financial or sexual abuse. Examples of abuse may include, but are not limited to, hitting, punching, slapping, throwing objects, biting, yelling, name-calling, belittling, threatening violence, stealing money, destroying possessions, isolating or committing sexual violence. Relationship violence can occur between casual or intimate partners, former partners or family members.

f. Stalking: a pattern of two or more incidents of unwanted attention, harassment, contact or other misconduct directed at a specific person based on sex/gender or sexual orientation that is unwelcome and would cause reasonable persons to fear harm to their physical health, mental or emotional health, safety, friends, family or property. Stalking may take many forms, including, but not limited to, persistent calling, texting, instant messaging, posting on a social networking site, monitoring behavior, taking pictures or physical stalking.

### 3. Other Policy Violations

A violation of any other University rule or policy, when motivated by the individual's actual or perceived sex or gender may be pursued using this policy and process. Note that violations of other University rules or policies that do not constitute a violation of this policy (e.g., a violation not motivated by unlawful discrimination or harassment based on sex/gender, sexual orientation or an act of interpersonal violence) may nonetheless trigger corrective action or sanctions under another University policy or policies.

Objectionable conduct that does not rise to the level of sex/gender discrimination or that is of a generic nature not on the basis of sex/gender or an act of interpersonal violence may not result in the imposition of sanctions/corrective action under this University policy, but may be addressed through other policies and may include remedial actions, education and/or conflict resolution mechanisms. For assistance with conflict resolution, individuals should contact the Title IX Coordinator, who may refer the parties to the Dean of Students for students, to the appropriate department chair or Dean for faculty, or to the Human Resources Department for staff.

F. JCU Consent Standard

1. Consent

Whether sexual misconduct has occurred depends in part on whether consent exists.

- Consent is granted when a person freely, actively and knowingly agrees at the time to participate in a particular sexual act with a particular person.
- Consent is mutually understandable words and/or actions that demonstrate a willingness to participate in mutually agreed-upon activity at every stage of that sexual activity.
- Consent is mutually understandable when a reasonable person would consider the words and/or actions of the parties to have reached agreement to engage in the particular sexual activity.
- In the absence of mutually understandable affirmative words or actions, it becomes the responsibility of the initiator (the person who wants to engage in a specific sexual activity) to obtain effective consent from the other partner.
- Consent has time boundaries. Consent at one time does not imply consent at any other time.
- The existence of a dating/romantic relationship between the persons involved or the fact of a previous sexual relationship does not automatically establish consent for future sexual activity.

Consent does not exist if:

- Agreement is only inferred from a person's silence or lack of resistance; there is threat of physical force, harm or intimidation; or there is coercion.
- The person is under the age of 16.
- Someone engaging in sexual behavior knew or should have known that the other person was incapacitated.



Regardless of the state of the Responding Party, the University will use the perspective of a "sober and reasonable person" in determining whether one should have known about the impact of the use of alcohol; drugs; the deceptive administering of any drug, intoxicant or controlled substance; mental illness, etc. on another's ability to give consent.

## 2. Incapacitation

Incapacitation exists when a person is unaware, blacked out, asleep, unconscious, unable to make rational/reasonable decisions and/or otherwise physically or mentally helpless to give effective consent. Indicators of incapacitation include, but are not limited to: outrageous/unusual behavior; inability or diminished ability to accurately discern one's environment (who, what, where, when and/or how); slurred speech; vomiting; severe intoxication; loss of voluntary motor skills; loss of involuntary motor skills; disjointed speech patterns (unable to follow a conversation or verbalize complete thoughts); and/or sleepiness that demonstrates an inability to control one's ability to stay awake. Because incapacitation may be difficult to discern, the person seeking the sexual behavior is strongly encouraged to err on the side of caution; i.e., when in doubt, assume the other person is incapacitated and therefore unable to give effective consent.

## 3. Coercion

Coercion exists when a person engages in threats, sexual pressuring or oppressive behavior to force another person to engage in unwanted sexual activity. Real or perceived power differentials between the individuals involved may create an atmosphere conducive to coercion. (Coercion can be differentiated from seduction by a repetition of the coercive activity in the face of resistance, the degree of pressure applied, or the initiator's knowledge that the pressure is unwanted.)

When one party has any professional responsibility for another's academic or job performance or professional future (i.e. faculty member and student, supervisors and employees etc.), consent may be difficult to assess, may be deemed not possible, and may be construed as coercive.

## G. Retaliation

Retaliation is defined as any adverse action taken against a person reporting sexual harassment or participating in the process under this policy or related procedures because of their report or their participation in the process. The University strictly prohibits retaliation against an individual for reporting sexual harassment, supporting a party bringing a claim of sexual harassment, participating in a sexual harassment investigation or providing information as a witness to an incident of sexual harassment. Retaliation includes any adverse action taken by the Responding Party or the Reporting Party or other related persons, including but not limited to, friends and relatives.

Retaliation is a serious violation of University Policy and will be treated as a separate instance of harassment or discrimination under this Policy.

Acts of alleged retaliation should be reported immediately to the Title IX Coordinator and will be promptly investigated. The University will take appropriate steps to help protect individuals who may be subjected to retaliation.

An adverse action is retaliatory only if it is taken because the person participated in a protected activity. Note that using the Title IX Complaint Process in bad faith, i.e., with deliberately false allegations and/or malicious accusations of harassment, is not a protected activity.

## **VI. INTERIM OR REMEDIAL ACTION**

The University may implement initial (and/or interim) remedial and responsive and/or protective actions as appropriate upon notice of alleged sexual harassment, retaliation and/or discrimination, and will take additional prompt remedial and/or disciplinary action with respect to any member of the community, guest or visitor who has been found to engage in sexually harassing or discriminatory behavior or retaliation.

The remedial, responsive and/or protective actions could include but are not limited to: no contact directives; providing counseling and/or medical services; academic support; interim suspensions; living arrangement adjustments; providing a campus escort; academic or work schedule and assignment accommodations; safety planning; issuing no-trespass orders; and/or referral to campus and community support resources. The University may also impose interim separation or suspension, as provided for under other University policies or procedures.

Note that, even where a violation of this policy is not found to have occurred, the University may recommend that mediation, counseling or other restorative steps be taken, or, if another University policy has been violated, referral to another process to implement corrective action as appropriate.

## **VII. REPORTING AND CONFIDENTIALITY**

### **A. Reporting Options**

The University strongly encourages persons who experience sexual harassment, sexual misconduct or interpersonal violence to report the harassment or misconduct. Reports of discrimination or harassment in violation of this policy can be made to the Title IX Coordinator or a Deputy Title IX Coordinator in person, by phone or online using the form located at: [sites.jcu.edu/title-ix](https://sites.jcu.edu/title-ix). To avoid a conflict of interest, any allegations of discrimination by the Title IX Coordinator should be reported directly to the Provost and Academic Vice President of the University.

### **B. Confidentiality**

Complaints and concerns may also be shared with University community members, but whether they can keep the matter confidential or must tell (and how much) the Title IX

Coordinator or one of the Deputy Title IX Coordinators depends on their reporting responsibilities. In order to make informed choices when consulting campus resources, one should be aware of confidentiality and mandatory reporting requirements, which are explained in further detail in Sections 1-3 below.

On campus, some resources may maintain confidentiality, offering options and advice without any obligation to inform University officials or an outside agency or individual unless the complainant requests that the information be shared. Other campus resources, such as JCUPD or “Responsible Employees” as referenced in Sections 2 and 3 below, cannot by law provide confidentiality (although they will make reasonable efforts to limit disclosure of information so as to protect privacy).

By making a complaint to a Non-Confidential Formal Reporting Option, one is initiating formal action by the University. The following describes the reporting options and confidential resources available at the University:

1. Privileged and Confidential Communications for All Title IX Sex/Gender and Interpersonal Violence Reports

If a party who has experienced an incident of sexual harassment or interpersonal violence does not desire action by the University and would like the details of the incident to be kept confidential, but desires to confide in someone, the party may speak with:

- a. a counselor at the University Counseling Center;
- b. a doctor, or nurse acting under a doctor’s direction at the University Health Center;
- c. an ordained member of the clergy (priest) acting in the context of pastoral care/spiritual advising; or
- d. off-campus local rape crisis counselors, domestic violence resources, local or state assistance agencies.

University employees who fall within this category will submit anonymous statistical information to JCUPD or the Title IX Coordinator for Clery Act (Campus Crime Statistics Act) purposes unless they believe it would be harmful to their client, patient or spiritual advisee, but will not otherwise share the information. Confiding in someone within this category does not trigger an investigation or other action by the University.

2. Non-Confidential but “Private” Communications

Non-Confidential but Private resources for discussing claims of sex/gender misconduct or interpersonal violence include any staff member who works for the University Counseling Center, Health Center, VPAC or Campus Ministry. These resources are initially required to provide a limited report to the Title IX Coordinator that includes the nature, date, time and general location of the incident, but these resources do not share any personally identifiable information in the report unless the disclosing party gives permission, except in the rare

event that the incident reveals a need to protect the immediate safety of the disclosing party and/or other members of the University community. Immediate safety concerns could include a pattern of alleged conduct, predation, weapons, violence or threat.

Unlike the confidential resources listed in Section VII.A, these resources are required to report as described above under the University's Mandatory Reporting Policy and cannot guarantee confidentiality. If a party who wishes to discuss an incident is unsure of someone's duties and ability to maintain privacy, one should ask that person about confidentiality before talking to them.

3. Non-Confidential Formal Reporting Option for Title IX – Sex/Gender and Interpersonal Violence Claims

A party wishing to initiate an investigation or other action by the University is encouraged to speak to a "responsible employee" to make a formal report concerning incidents of sexual misconduct. Under the University's Mandatory Reporting Policy, all University employees, except those identified in VII.(B)(1) of this policy, are designated as "mandatory reporters" and have a duty to report incidents of possible sexual discrimination, sexual harassment or interpersonal violence to the Title IX Coordinator. This makes all employees "Responsible Employees" when it comes to reporting incidents of sex/gender misconduct or interpersonal violence.

When a party informs a "Responsible Employee" about an incident involving sexual misconduct, the Responsible Employee is required to report all relevant details about the incident to the University's Title IX Coordinator or designee. This includes the names of the Reporting Party(ies), alleged Responding Party(ies), witnesses and any other relevant facts, including the date, time and specific location (if known).

4. Requests for Confidentiality

A party's request for confidentiality or that no investigation be pursued should be made to the Title IX Coordinator or to the Responsible Employee at the time the report is made. The Responsible Employee will then inform the Title IX Coordinator of the request, which request will be weighed by the Title IX Coordinator, based on relevant information that may be received in consultation with others involved in monitoring University safety matters, against the University's obligation to provide a safe, non-discriminatory environment for all members of the University community, including the reporting party. However, honoring such a request for confidentiality may limit the University's ability to meaningfully investigate and pursue conduct action against an accused individual.

Reporting parties have the right, and can expect, to have reports taken seriously by the University when formally reported, and to have those incidents investigated and properly resolved through these procedures. When a responding party is found in violation, the University will act to end the discrimination, prevent its recurrence and remedy its effects.

Non-Confidential Formal Reporting still affords privacy to the reporting party, and only a small group of officials who need to know will be told. Information will be shared as necessary with investigators, witnesses and the responding party. The people with this knowledge are charged with preserving a reporting party's rights and privacy to the extent reasonable in order for an adequate, reliable and impartial investigation to be conducted.

C. Reporting of Instances Involving Minors

Sexual harassment, sexual misconduct or interpersonal violence involving a minor who is a student will be processed consistent with this Policy. Anyone witnessing or otherwise knowing of a violation of this policy that involves a non-student individual under the age of 18, or under the age of 21 and physically or mentally impaired, should refer to the University's [Minors on Campus Policy](#). Any observed violations of that policy should be reported to the Title IX Coordinator and/or to JCUPD and the person in charge of the program. Whether involving a student or non-student, the University, the Title IX Coordinator, and/or privileged and confidential resources also may be required to report sexual misconduct involving a minor to Cuyahoga County's Children & Family Services at (216) 431-4500.

**VIII. REPORTING TO POLICE AND FEDERAL TIMELY WARNING OBLIGATION**

There may be instances in which sexual harassment or sexual misconduct constitutes a criminal act. Anyone who has experienced sexual misconduct that they believe may constitute a crime may choose to contact at any time the JCU Police Department or a local police jurisdiction where the sexual misconduct occurred. Choosing not to pursue criminal action does not alter the responsibility of the University to investigate and take appropriate action related to the report of sexual harassment or sexual misconduct.

Parties reporting sexual misconduct or interpersonal violence should be aware that under the Clery Act, the University via JCUPD, must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to members of the campus community. The University will undertake reasonable efforts to ensure that a Reporting Party's name and other identifying information is not disclosed in any timely warning, while still providing enough information for community members to make safety decisions in light of the potential danger.

## Title IX Reporting Offices for Incidents of Sexual Harassment and Interpersonal Violence

Any incidents of sexual harassment and interpersonal violence should be reported to the Title IX Coordinator. Incidents can also be reported to a designated Deputy Title IX Coordinator for a particular constituency.

<p><b>All Complaints and Complaints Involving Visitors</b></p> <p>Kendra Svilar Title IX Coordinator John Carroll University Administration Bldg. Room 130D 1 John Carroll Blvd. University Heights, OH 44118 216-397-1559 <a href="mailto:ksvilar@jcu.edu">ksvilar@jcu.edu</a></p>	<p><b>Complaints Involving Faculty</b></p> <p>James Krukones, PhD, Deputy Title IX Coordinator, Associate Academic Vice President John Carroll University Administration Bldg. Room 133E 1 John Carroll Blvd. University Heights, OH 44118 216-397-4762 <a href="mailto:jkrukones@jcu.edu">jkrukones@jcu.edu</a></p>
<p><b>Complaints Involving Students</b></p> <p>Sherri Crahen, PhD, Deputy Title IX Coordinator, Associate Vice President for Student Affairs &amp; Dean of Students John Carroll University Lombardo Student Ctr. Room 207A 1 John Carroll Blvd. University Heights, OH 44118 216-397-3010 <a href="mailto:scrahen@jcu.edu">scrahen@jcu.edu</a></p>	<p><b>Complaints Involving Staff</b></p> <p>Lori Sprague, Deputy Title IX Coordinator, Assistant Director of Human Resources John Carroll University Rodman Hall Room 138 1 John Carroll Blvd. University Heights, OH 44118 216-397-4962 <a href="mailto:lsprague@jcu.edu">lsprague@jcu.edu</a></p>
<p><b>Complaints Involving Athletics</b></p> <p>Gretchen Weitbrecht, Deputy Title IX Coordinator (Varsity Athletics), Associate Athletic Director John Carroll University DeCarlo Varsity Ctr. Room 110 1 John Carroll Blvd. University Heights, OH 44118 216-397-4194 <a href="mailto:gweitbrecht@jcu.edu">gweitbrecht@jcu.edu</a></p> <p>For Non-Varsity athletic matters, contact:</p> <p>Courtney Farver, Deputy Title IX Coordinator Director of Recreation and Intramurals Recreation Complex Room 151 (216) 397-3092 <a href="mailto:cfarver@jcu.edu">cfarver@jcu.edu</a></p>	<p><b>EXTERNAL CONTACTS</b></p> <p>Inquiries about this policy and accompanying complaint procedures may be made externally to:</p> <p>Office for Civil Rights (OCR) U.S. Department of Education Telephone #: (800) 421-3481 Email: <a href="mailto:OCR@ed.gov">OCR@ed.gov</a> Web: <a href="http://www.ed.gov/ocr">http://www.ed.gov/ocr</a></p> <p>Equal Employment Opportunity Commission (EEOC) Contact: <a href="http://www.eeoc.gov/contact/">http://www.eeoc.gov/contact/</a></p>