

Juan Salgado Chancellor

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From: Juan Salgado, Chancellor City Colleges of Chicago 180 N. Wabash, Suite 200 Chicago, IL 60601

To: The City Colleges of Chicago Board of Trustees

Date: December 5, 2019

Re: Sexual Harassment and Assault Report

The City Colleges of Chicago (CCC) is strongly committed to ensuring that its learning and working environments are free of discrimination and harassment, including sexual harassment. The Equal Employment Opportunity (EEO) and Title IX Policy defines sexual harassment and outlines CCC's complaint resolution process. Students, employees, applicants, and program participants at any one of the CCC campuses, satellite locations, or the District Office may report allegations of sexual assault or harassment following the procedures listed below:

Reporting a Complaint of Sexual Harassment

- 1. Any individual who believes (s)he has been a victim of sexual harassment should report the alleged sexual harassment immediately to Campus Security or directly to the EEO Office.
- 2. If any other employee receives a report or information of sexual harassment, the employee must immediately report the alleged sexual harassment to the EEO Office.
- 3. Individuals are strongly encouraged to report incidents of, or share information about, sexual harassment as soon as possible after the incident occurred. CCC may ultimately be unable to adequately investigate if too much time has passed or if an accused individual has left CCC. Other factors that could negatively affect CCC's ability to investigate include the loss of physical evidence and the potential loss of memory or departure of witnesses.
- 4. Victims of sexual harassment should make every effort to preserve evidence as may be necessary for the proof of sexual harassment or for obtaining an order of protection.
- 5. Complaints should be submitted in writing through CCC's Discrimination and Harassment Form. All complaints must be directed to the EEO Office in the Office of Human Resources at the District Office. The EEO Office will also accept complaints via email at <u>eeofficer@ccc.edu</u>. For more information, contact the EEO Office at (312) 553-2865.



- 6. Because sexual harassment is a serious offense that may threaten the community as a whole, in some instances City Colleges of Chicago may be obliged to pursue an investigation of an alleged sexual harassment without the cooperation of the victim. In such instances, the EEO Office will inform the victim of its obligation to address a community safety issue.
- 7. If applicable, individuals have the right to file a Complaint with the EEO Office and a criminal complaint simultaneously.

EEO Office Investigation Process

Pursuant to the EEO/Title IX Policy, all employees, students, and program participants are protected from discrimination and harassment, including sexual harassment. The EEO/Title IX Policy establishes that anyone who believes he or she has experienced discrimination or harassment in violation of CCC's EEO/Title IX Policy may file a written complaint with the EEO Office within 180 days of the alleged discriminatory conduct or harassment.

Once a written complaint has been filed with and accepted by the EEO Office, an investigation will commence. The EEO Office investigation process is as follows:

- Evaluate complaints and if necessary implement interim measures, which may include but are not limited to:
 - Putting a safety plan in place
 - Providing a security escort
 - Ensuring the two parties do not share class schedule or activities
 - Modifying class schedules until an investigation is complete
 - o Implementing a no-contact order
- Interview Complainant, Respondent and any relevant witnesses.
 - Complainant The person who claims to have been subjected to harassment or discriminatory conduct and files an EEO complaint.
 - Respondent The person accused of subjecting the Complainant to harassment or discriminatory conduct.
- Review and consider relevant documentation and evidence. Evidence may be provided by the parties during the investigation, but may also be obtained by the EEO Office from available resources including payroll records, disciplinary files, security documents, and tape recordings.
- At the conclusion of the investigation, the EEO Office prepares an investigatory report that summarizes the testimony, analyzes the evidence obtained during the investigation, and makes a finding using the "preponderance of the evidence" standard as to whether or not the EEO Policy or any other District policies were violated.



- If a violation of the EEO/Title IX Policy is found, the complaint is "sustained" and the EEO Office makes an appropriate disciplinary or corrective action recommendation.
- $\circ~$ If a no violation of the EEO/Title IX Policy is found, the complaint is "not sustained."
- The EEO Office notifies the parties whether the complaint of discrimination or harassment was sustained or not sustained. Also, the EEO Office forwards sustained findings to the College or relevant District Office department to issue discipline.

There are three departments that may be involved in the process of investigating and documenting an allegation. The extent of their involvement is outlined below.

Office of Equal Employment Opportunity	 Responsible for assuring compliance with the District's EEO Policy, inclusive of Title IX. Investigates and responds to student, employee and program participant complaints of discrimination, harassment, sexual assault and stalking. Refers cases to OIG when a potential conflict of interest exists.
Office of Inspector General	 Conducts investigations regarding waste, fraud and misconduct by any officer, employee, or member of the Board; any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to the CCC. Refers cases to EEO unless there is already an open case involving the same person(s) or a potential conflict of interest.
Office of Safety and Security	 Works to ensure a safe and secure environment for all students, staff, faculty and visitors. Conducts preliminary investigations pertaining to the alleged incident and compiles incident report. Refers all allegations to EEO. Notifies proper authorities if warranted.



In instances where an individual reports an allegation to the Office of the Inspector General (OIG), the OIG will review the case to determine whether it should be referred to the EEO Office. The OIG may conduct the investigation if there is a pending OIG investigation involving the same subject and/or victim involving non-sexual harassment issues. The OIG may also conduct the investigation of an EEO harassment-type allegation if referred by the EEO Office to avoid a conflict of interest. The summary of incidents reported to the OIG can be found in the OIG Bi-Annual Report.

Allegations are often reported to Campus Security. Alleged incidents that are reported to security are documented on an Incident Report Form and referred to EEO. Similarly, if an allegation begins with a report to EEO and a physical safety or security issue is identified then EEO will report it to Security.

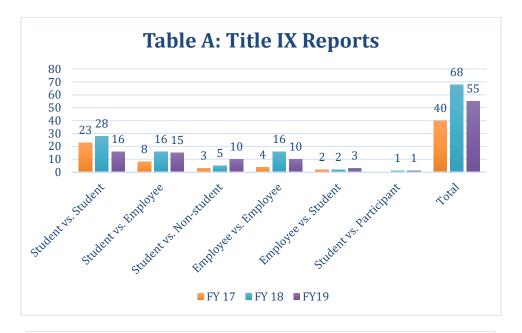
The EEO Office compiles an annual report for the Office of the Attorney General, Civil Rights Bureau as required per the Illinois Preventing Sexual Harassment in Higher Education Act.

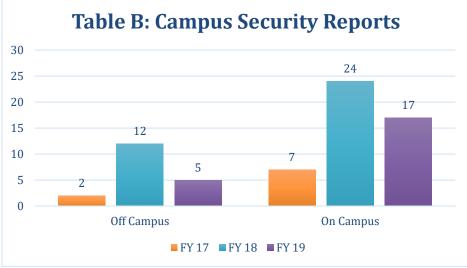
The table below outlines the number of reports received by each of these offices. Due to the inter-relationship described above, these numbers are duplicative, however, all the reports are captured in the EEO/Title IX data.

	FY 2017 total number of	FY 2018 total number of	FY 2019 total number of
	reports	reports	reports
EEO	Total: 40	Total: 68	Total: 55
	Sexual Harassment: 31	Sexual Harassment: 58	Sexual Harassment: 46
* See Table A	Domestic/Dating Violence: 7	Domestic/Dating Violence: 6	Domestic/Dating Violence: 6
	Sexual Assault: 2	Sexual Assault: 4	Sexual Assault: 3
OIG	Total: 3*	Total: 9*	Total: 5*
	Sexual Harassment: 2	Sexual Harassment: 8	Sexual Harassment: 5
	Sexual Assault: 1	Sexual Assault: 1	Sexual Assault: 0
	* of these reports 1 was referred to EEO, 2 were investigated by OIG. 1 resulted in the termination a CCC employee.	* of these reports 2 were referred to EEO, 7 were investigated by OIG. 1 resulted in the termination a CCC employee.	* of these reports 3 were referred to EEO, 1 was deferred to EEO's investigation of the same matter, 1 was duplicative, 0 were investigated by OIG.
Security	Total: 14	Total: 31	Total: 22
	Sexual Harassment: 11	Sexual Harassment: 20	Sexual Harassment: 17
* See Table B	Sexual Assault: 3	Sexual Assault: 11	Sexual Assault: 5



The data reflects a decrease in reports between 2018 and 2019. This is a noteworthy datapoint given the national scrutiny and focus on sexual harassment and sexual violence in the media. By comparison, there was an increase in CCC employees and students reporting incidents between 2017 and 2018. Despite the reduction in the number of complaints, the EEO Office remains vigilant in responding to and addressing all Title IX concerns to ensure that students and employees have academic and work environments free of inappropriate sexual conduct.









Disciplinary Action Resulting from EEO Office Investigations

The EEO Office is dedicated to maintaining an environment free of discrimination and harassment. The EEO Office continues to strive to fulfill CCC's commitment to maintain a discrimination and harassment free environment for all students, employees, applicants, and program participants. In continuance of this mission, the EEO Office will continue to provide training and counsel to CCC students, employees, applicants, and program participants.

A sustained finding will result in corrective or disciplinary action against the student or employee found to have engaged in conduct which violates the EEO/Title IX Policy. A sustained finding may result in one or more of the following:

- Required training.
- Referral to a Student Disciplinary Hearing Committee to assess the appropriate level of discipline, ranging from warning to expulsion.
- Referral to a Human Resources Business Partner to issue discipline or arrange a predisciplinary hearing in accordance with any relevant collective bargaining agreement to determine the appropriate level of discipline. Disciplinary actions may range from warnings to termination of employment.

Below is data pertaining to disciplinary outcomes for recent Title IX cases:

FY19 - Total of 55 Reports

Sexual Harassment Complaints – Forty-one (46) total complaints

- Fourteen (14) Student v Student Complaints
 - One (1) Sustained (Offender referred to Student Disciplinary Committee)
 - One (1) Not Sustained
 - Ten (10) Administratively Closed*
 - o Two (2) Open
- Fifteen (15) Student v Employee Complaints
 - Two (2) Sustained (2- Employees Terminated/Designated ineligible for rehire)
 - Three (3) Not Sustained
 - Six (6) Administratively Closed*
 - Four (4) Open
- Four (4) Student v Non-Student Complaints
 - Four (4) Administratively Closed*
- Ten (10) Employee v Employee Complaints
 - One (1) Sustained (Offender Terminated)
 - Two (2) Not Sustained
 - Three (3) Administratively Closed*
 - Four (4) Open



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- Three (3) Employee v. Student Complaints
 - Two (2) Not Sustained
 - One (1) Administratively Closed*

Domestic/Dating Violence Complaints - Six (6) total complaints

- Two (2) Student v Student Complaints
 - o Two (2) Administratively Closed*
- Four (4) Student v Non-Student Complaints
 - Four (4) Administratively Closed*

Sexual Assault Complaints - Three (3) total complaints

- One (1) Student v Participant (Chicago Fire Department) Employee Complaint
 - One (1) Administratively Closed (unable to investigate as complainant was non-responsive; referred to City of Chicago's OIG)
- Two (2) Student v Non-Student Complaint
 - Two (2) Administratively Closed (unable to investigate as offender was not CCC affiliated)

FY18 - Total of 68 Reports

Sexual Harassment Complaints – Fifty-eight (58) total complaints

- Twenty One (21) Student v Student Complaints
 - One (1) Sustained (Student respondent referred to Student Disciplinary Committee)
 - Three (3) Not Sustained
 - Eleven (11) Administratively Closed*
 - Six (6) Open
- Fifteen (15) Student v Employee Complaints
 - Two (2) Sustained (2- Employees Terminated)
 - Four (4) Not Sustained
 - Six (6) Administratively Closed*
 - Three (3) Open
- Three (3) Student v Non Student Complaints
 - One (1) Not Sustained
 - One (1) Administratively Closed*
 - One (1) Open
- Sixteen (16) Employee v Employee Complaints
 - Three (3) Sustained (1 Training; 1 Suspension; 1 Terminated)
 - Three (3) Not Sustained
 - Eight (8) Administratively Closed*
 - o Two (2) Open





- Two (2) Student v Employee Complaints
 - One (1) Not Sustained
 - One (1) Administratively Closed*
- One (1) Participant
 - One (1) Open

Domestic/Dating Violence Complaints - Six (6) total complaints

- Five (5) Student v Student Complaints
 - One (1) Sustained (1- Respondent Banned from Campus)
 - Four (4) Administratively Closed*
- One (1) Student v Non Student Complaints
 - One (1) Administratively Closed*

Sexual Assault Complaints - Four (4) total complaints

- Two (2) Student v Student Complaints
 - One (1) Not Sustained (Complainant admitted it was consensual)
 - One (1) Administratively Closed (unable to investigate as offender was not CCC affiliated)
- One (1) Student v Employee Complaint
 - One (1) Not Sustained (Complainant refused to participate Eduardo Barrios KKC Lifeguard case)
- One (1) Student v Non Student Complaint
 - One (1) Administratively Closed (unable to investigate as offender was not CCC affiliated)

<u> FY17 - Total of 40 Reports</u>

Sexual Harassment Complaints – Thirty-one (31) total complaints

- Fourteen (14) Student v Student Complaints
 - Two (2) Sustained (Student respondents referred to Student Disciplinary Committee; Campuses would have specific disciplinary outcomes for students)
 - Six (6) Not Sustained
 - Six (6) Administratively Closed*
- Eight (8) Student v Employee Complaints
 - Two (2) Sustained (1 Respondent Training; 1-Employee Terminated)
 - Two (2) Not Sustained
 - Four (4) Administratively Closed*
- Three (3) Student v Non Student Complaints
 - Three (3) Administratively Closed*
- Four (4) Employee v Employee Complaints





- One (1) Not Sustained
- Three (3) Administratively Closed*
- Two (2) Student v Employee Complaints
 - Two (2) Sustained (Students respondents referred to Student Disciplinary Committee)

Domestic/Dating Violence Complaints - Seven (7) total complaints

- Two (2) Student v Student Complaints
 - Two (2) Sustained (2- Respondents Banned from Campus)
 - Five (5) Administratively Closed*

Sexual Assault Complaints - Two (2) total complaints

- Two (2) Student v Student Complaints
 - One (1) Sustained (Offender banned from campus)
 - One (1) Administratively Closed (unable to investigate as offender was not CCC affiliated)

* Administratively Closed = either "No EEO Issue", referred, unable to investigate due to Complainant unresponsive in engagement in process, or unable to investigate due to no jurisdiction

EEO Office Outreach and Awareness Efforts

In an effort to increase awareness of CCC's Title IX policy and reporting procedures, a marketing campaign was created to target employees, students and program participants. Title IX Coordinators, Confidential Advisors and Security Directors were individually consulted to offer insight on how to increase Title IX awareness in 2019. As a result, the EEO Office developed the following components in 2019:

- "Know Your Rights" advertising materials (flyer, online updated advertisement per OCR requirements)
- Title IX educational blurbs via "The 411 Special Announcements"
- Title IX advertisements on campus LCD screens
- Increase of in-person trainings
- Lifespan/VOICES partnership to increase awareness

Lifespan is a nationally recognized not-for-profit organization that provides educational and technical assistance aimed at reducing domestic violence and sexual assault within Chicago and Suburban Cook County. Recent partnerships with Lifespan increased CCC training programs and awareness campaigns throughout the year. Strong messages regarding awareness, prevention, bystander intervention, and discussions concerning institutional, federal and state policies on sexual and/or relationship misconduct, as well as, sex/gender discrimination are in continuous rotation on all campuses. This partnership implements



strategies to continue in the promotion of awareness while complying with Title IX mandates.

The EEO Office is undertaking efforts to create a robust online education program for first year and transfer students, which offers self-reflective based eLearning courses with the ability to provide mobile and browser friendly accessibility. Through such an online training platform, CCC will be able to fulfill federally mandated education in accordance with the Office of Civil Rights, as well as provide maximum benefits to staff and students while catering to different learning styles.

Initial marketing campaigns targeted an English-speaking market. The EEO Office is committed to promoting diversity and multiculturalism within its marketing and training components. To this end, the Marketing Department is exploring multi-lingual vendors to translate our marketing materials into other languages, enabling the EEO Office to increase Title IX awareness throughout the District by reaching a broader audience.

Campus specific marketing materials will soon be available for additional support to empower stakeholders. These materials will aim to inform readers of CCC's mission and build community trust, while providing resources for victims of sexual harassment and assault.



Tables C, D and E below outline the trainings and targeted audiences between fiscal years 2017, 2018, and 2019.

Table C – FY17 Title IX Trainings

In fiscal year 2017, the EEO Office held 17 trainings at seven different campuses; trainings categorized under "DO" are district wide and may apply to more than one campus. Overall there were a total of 101 student attendees and a total of 402 employee attendees. Most of these trainings were requested by Campus Administration as a proactive approach. One training was conducted as a result of a Title IX investigation at Malcolm X College.

DATE	CAMPUS	AUDIENCE	TOPIC	# OF ATTENDEES
11/30/2016	DO	Security Leadership	Title IX Refresher	16
12/21/2016	MX	Athletics Leadership	Title IX / Bystander	17
12/21/2016	MX	Athletics (Coaches)	Title IX / Bystander	14
12/22/2016	HW	Professional Development	Title IX (Roleplay)	50
1/5/2017	WR	Adult Education	Title IX / Bystander	8
1/6/2017	WR	Adult Education	Title IX / Bystander	10
1/12/2017	DTECH	Faculty	Title IX / Bystander	13
1/12/2017	ОН	Student Athletes	Title IX / Bystander	30
1/17/2017	MX	Student Athletes	Title IX / Bystander	22
2/2/2017	TR	Student Athletes	Title IX / Bystander	14
2/7/2017	WR	Student Athletes	Title IX / Bystander	20
3/7/2017	DO	Compliance Alliance	Title IX Update	15
3/17/2017	DO	HR and Security Management	Emergency Suspension	28
3/23/2017	КК	Career Services	Title IX / Bystander	6
4/21/2017	MX	College Wide Meeting	Title IX / Bystander	200
4/27/2017	HW	Clothesline Project (Wellness Center)	Sexual Assault Panel	15
4/28/2017	КК	Advisors and Staff	Title IX / Bystander	25
			TOTAL ATTENDEES	503



Table D - FY18 - Title IX Trainings

In fiscal year 2018, the EEO Office held 35 trainings at six different campuses; trainings categorized under "DO" are district wide and may apply to more than one campus. Overall there were a total of 324 student attendees and a total of 449 employee attendees. The EEO Office worked with Campus Administration to increase the number of student trainings. One training was conducted as a result of a Title IX investigation at Olive-Harvey College.

DATE	CAMPUS	AUDIENCE	ΤΟΡΙϹ	# OF ATTENDEES
7/18/2017	КК	Washburne Employees	Title IX, EEO, Bystander	16
	DO	SGA Officers	Title IX, EEO, Bystander	25
	ОН	OH Administration	Title IX, EEO, Bystander	11
8/9/2017	DO	CCC Athletics Administration	Title IX, EEO, Bystander	8
8/11/2017	КК	KK Security (session 1)	Title IX, EEO, Bystander	5
8/11/2017	КК	KK Security (session 2)	Title IX, EEO, Bystander	4
8/11/2017	KK	KK Security (session 3)	Title IX, EEO, Bystander	5
8/14/2017	DO	FDW Table	Title IX	5
8/15/2017	KK	FDW Breakout Session	Title IX	8
8/17/2017	HW	FDW Breakout Session	Title IX	3
8/22/2017	KK	KK Adult Educators	Title IX, EEO, Bystander	25
8/22/2017	TR	FDW Breakout Session	Title IX	4
8/22/2017	TR	FDW Breakout Session	Title IX	1
8/25/2017	ОН	OH Security and Janitors	Title IX, EEO, Bystander	20
8/25/2017	ОН	OH Security and Janitors	Title IX, EEO, Bystander	27
10/4/2017	TR	Men's Basketball	Title IX, EEO, Bystander	17
10/11/2017	MX	MX Athletes	Title IX, EEO, Bystander	24
10/11/2017	MX	MX Athletes	Title IX, EEO, Bystander	50
10/11/2017	MX	MX Athletics	Title IX, EEO, Bystander	19
10/17/2017	HW	Health & Wellness Resource Fair	Title IX Table	50
10/27/2017	ОН	OH Athletes	Title IX, EEO, Bystander	35
1/11/2018	КК	KK Faculty	Title IX & VOICES	50
1/23/2018	KK	KK Athletes	Title IX, EEO, Bystander	28
2/14/2018	HW	Health & Wellness Resource Fair	Title IX Table	50
2/27/2018	HW	SGA E-Board Discussion	Title IX Q&A	10
3/16/2018	WR	State of the College	Title IX Employee Essentials	100
3/19/2018	HW	Women's Empowerment Meeting	Title IX, EEO, Bystander	5
3/22/2018	HW	SGA Q&A	Title IX Q&A	30
4/4/2018	ОН	Adminstrators and Staff	Title IX, EEO, Bystander	11
4/16/2018	DO	New Employees	Title IX	14
4/16/2018	DO	New Employees	Title IX	22
5/9/2018	DO	CCC Athletics Adminstration	Title IX	10
5/11/2018	HW	Academic Support Services	Title IX, EEO, Bystander	32
6/1/2018	HW	HW Security	Title IX	21
6/26/2018	DO	June Orientation	Title IX, EEO	28
			TOTAL ATTENDEES	773

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Table E – FY19 Title IX Trainings

In fiscal year 2019, the EEO Office held 57 trainings throughout the District. Overall there were a total of 412 student attendees and a total of 1049 employee attendees. There was a large increase in employee trainings due to ongoing new employee orientations. Additionally, we provided a College-wide training at Daley College as required in agreement with the Office of Civil Rights over a reported incident at the College.

DATE	CAMPUS	AUDIENCE	ΤΟΡΙϹ	# OF ATTENDEES
7/23/2018	DO	New Employee Orientation	EEO, Title IX	15
8/7/2018	MX	Men's Soccer and Volleyball Teams	Title IX	16
8/7/2018	MX	Soccer and Volleyball Coaches	Title IX	6
8/10/2018	TR	Truman Athletics	EEO, Title IX	27
8/13/2018	DO	FDW Table & Breakout	EEO, Title IX	169
8/24/2018	DO	New Employee Orientation	EEO, Title IX	34
9/4/2018	MX	Cross Country Teams	Title IX	25
9/4/2018	MX	Cross Country Coaches	Title IX	5
9/5/2018	КК	Student Athletes	Title IX	38
9/5/2018	КК	Athletic Directors & Coaches	Title IX	9
9/18/2018	MX	Women's Basketball Coaches	Title IX	4
9/18/2018	MX	Women's Basketball Student Athletes	Title IX	10
10/1/2018	КК	Fall Orientation - Athletic Directors	Title IX	8
10/26/2018	WR	Local 1708 and 1600 Prof Employees	Title IX	58
10/29/2018	DO	New Employee Orientation	EEO, Title IX	22
11/7/2018	DO	Title IX Coordinators & Security	Title IX	19
11/27/2018	DO	New Employee Orientation	EEO, Title IX	12
12/14/2018	HW	Local 1708 and 1600 Prof Employees	EEO, Title IX	88
1/8/2019	DO	New Employee Orientation	EEO, Title IX	21
1/10/2019	DO	Athletics Admin Orientation (session 1)	EEO, Title IX	14
1/10/2019	DO	Athletics Admin Orientation (session 2)	EEO, Title IX	12
2/13/2019	DA	Student Athletes	Title IX	19
2/14/2019	HW	Students and Staff - LGBTQ	Title IX	20
2/22/2019	MX	Advising & DAC	Title IX	23
2/26/2019	TR	Students	Title IX	8
2/26/2019	DO	New Employee Orientation	EEO, Title IX	12
2/27/2019	ОН	Students	Title IX	8
2/28/2019	HW	Students -Pride Alliance	Title IX	10
2/28/2019	WR	Staff	Title IX	7
3/1/2019	WR	Students	Title IX, Bystander	60
3/6/2019	DA	Wellness Center Staff	Title IX	7
3/11/2019	ОН	Students	Title IX	15
3/12/2019	DA	All campus employees	EEO, Title IX	367
3/14/2019	DA	Students	Title IX	25
3/15/2019	MX	Health Science Students	Title IX	20

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Table E – FY19 Title IX Trainings – continued:

DATE	CAMPUS	AUDIENCE	ΤΟΡΙϹ	# OF ATTENDEES
3/15/2019	MX	Financial Aid, Records & Admissions	Title IX	8
3/19/2019	MX	Students	Title IX, Consent	4
3/20/2019	MX	Students	Title IX	4
3/22/2019	TR	Staff/Faculty	Title IX	15
3/25/2019	DO	New Employee Orientation	EEO, Title IX	10
3/29/2019	MX	Advising & Records	Title IX	7
4/3/2019	MX	Students	Title IX, Bystander	4
4/4/2019	WR	Current & Prospective Students	Title IX	30
4/5/2019	MX	Admissions, DAC & Records	Title IX	15
4/8/2019	WR	Students	Title IX	18
4/12/2019	HW	Staff	Title IX	15
4/22/2019	ОН	Students	Title IX, Bystander	25
4/24/2019	DA	Student Athletes	Title IX	11
4/26/2019	MX	Students -SGA	Title IX	15
5/10/2019	DA	Advising	Title IX	17
5/17/2019	MX	Student Services Staff	Title IX	12
5/17/2019	DO	New Employee Orientation	EEO, Title IX	7
5/24/2019	DO	Staff	EEO, Title IX	9
5/25/2019	TR	DAC & Records	Title IX	20
7/1/2019	DO	New Employee Orientation	EEO, Title IX	16
7/29/2019	DO	New Employee Orientation	EEO, Title IX	13
7/30/2019	DO	Title IX Coordinators & Security	Confidential Advisor	18
			TOTAL ATTENDEES	1506