



## Procedures to Address Reports of Sexual Misconduct in Education

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**Printed copies are for reference only. Please refer to the electronic copy for the latest version.**

## Purpose

The following procedures have been adopted by Cleveland Clinic to implement its [Sexual Misconduct in Education Policy](#). These procedures are designed to provide a supportive process for individuals who report discrimination and to ensure a fair process for individuals who are accused of discriminatory conduct. Internal investigation of allegations of institutional discriminatory treatment or systemic discriminatory practices is intended to ensure that Cleveland Clinic meets its commitment to an open and inclusive educational and employment environment. These procedures also describe Cleveland Clinic's efforts to conduct prompt, thorough, and fair investigations as required by law.

These procedures are intended to be flexible in order to allow Cleveland Clinic to promptly, fairly and impartially address reports of prohibited conduct. The Title IX Coordinator has discretion to deviate from the procedures when deemed appropriate for that purpose. The Title IX Coordinator may designate another person to fulfill their duties under these procedures. If the Title IX Coordinator has a conflict of interest with respect to a particular report, the Law Department shall designate a person to fulfill the duties of the Title IX Coordinator.

## Definitions

All definitions set forth in the Policy are applicable to these procedures.

**Cleveland Clinic United States locations:** Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, Cleveland Clinic Florida, Cleveland Clinic Hospital (Weston), Coral Springs Ambulatory Surgery Center, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Complainant** means a person who may have been subject to Prohibited Conduct as defined in the Policy. The complainant(s) and respondent(s) may be referred to collectively as the parties.

**Confidential Resource** is a professional counselor, pastoral counselor or a health care provider serving in their capacity as a counselor or health care provider and any employee so designated as a confidential resource by their institute or department.

**Educational Program or Activity:** Any program or activity offered at Cleveland Clinic or by Cleveland Clinic employees in the scope of their duties that is educational in nature beyond on-the-job training, general interest, or routine continuing education programs. Factors in determining whether a program or activity is educational include whether it is structured through a particular course of study; whether participants earn academic credit toward a degree or certificate, or qualify to sit for professional exams; or whether a program provides instructors, exams or other evaluation process. Educational programs and activities include, without limitation, degree- or certificate-granting programs offered by Cleveland Clinic and affiliated colleges and universities; clinical rotations for degree- or certificate-granting programs; medical and other residency programs; research and medical fellowships;

internships; and educational programs offered to middle school, high school, college and university students.

**Participant** means any person participating in Cleveland Clinic’s educational programs and activities, as defined in the Policy. The term includes, but is not limited to, staff and faculty, preceptors, medical and other residents, research and other fellows, visiting scholars, interns, students and patients participating in educational programs and activities. .

**Policy** means Cleveland Clinic’s [Sexual Misconduct in Education Policy](#)

**Preponderance of the Evidence** is the standard of proof used to determine if the Policy has been violated. To meet this standard, the evidence must show that the conduct considered a violation is more likely than not to have occurred.

**Procedures** refers to these Procedures for Addressing Reports of Sexual Misconduct in Education.

**Prohibited Conduct** is conduct that violates the Policy. Prohibited conduct includes sex discrimination, sexual harassment, sexual violence and retaliation, as those terms are defined in the Policy.

**Report** means a report of prohibited conduct submitted to Cleveland Clinic.

**Respondent** means a person whose conduct is alleged to be prohibited conduct as defined in the Policy. The respondent(s) and the complainant(s) may be referred to collectively as the parties.

**Responsible Employee** means an employee who has the authority to address reports of prohibited conduct as defined in the Policy. Program directors, administrators, supervisors, program and project managers, coordinators, clinical instructors, clinical educators, fieldwork instructors, fieldwork educators, principal investigators, mentors, Research Laboratory employees, preceptors and faculty members are responsible employees, unless they are considered a confidential resource.

**Title IX Determination Committee:** A committee of at least five (5) individuals nominated by the Education Institute, the Lerner Research Institute, Human Resources, Nursing Education and the Office of Professional Staff Affairs. A committee member need not work in the institute or office that nominated the committee member. Committee members shall serve terms of two (2) years with no limit on the number of times they may be re-nominated. Before serving on a determination panel, each committee member shall be trained on the scope of the Policy, the definitions of prohibited conduct, the investigation process, how to serve impartially, and issues of relevance of questions and evidence.

**Title IX Determination Panel** is a panel of no fewer than three (3) members of the Determination Committee convened as part of the investigation process.

## Procedure

### Reporting Incidents of Prohibited Conduct

All reports of emergency situations should be made to 911 or to the appropriate [Protective Services emergency phone number](#).

#### Reporting Options

Any person may report sex discrimination, sexual harassment, sexual violence or retaliation in Cleveland Clinic's educational programs or activities.

All participants in, or applicants to, Cleveland Clinic's educational programs and activities who believe that they have been subjected to sex discrimination, sexual harassment, sexual violence, or retaliation are strongly encouraged to make a report. Prompt reporting allows Cleveland Clinic to provide resources to the participant and facilitates an appropriate response. Reports may be made at any time, but delayed reports may limit the availability of evidence and witnesses, and make it difficult for Cleveland Clinic to respond in an effective and fair matter.

Employees of schools, colleges and universities whose students participate in Cleveland Clinic educational programs and activities are encouraged, and in some cases required by agreement, to report to Cleveland Clinic's Title IX Coordinator any information that leads them to reasonably believe that a participant in a Cleveland Clinic educational program or activity has been subject to Prohibited Conduct under the Policy.

Reports may be made to:

Cleveland Clinic Title IX Coordinator:

[Title IX Coordinator](#)

[TitleIX@ccf.org](mailto:TitleIX@ccf.org)

[216-445-9319](tel:216-445-9319)

[NA-31](#)

Cleveland Clinic Police Department (CCPD): Incidents of prohibited conduct that also constitute criminal conduct (generally, sexual violence) may be reported to the Cleveland Clinic Police Department or other law enforcement agency. A decision whether to report to law enforcement is left to the complainant except in rare circumstances in which there is an on-going threat to the Cleveland Clinic community. When a report is made to both the Title IX Coordinator and a law enforcement agency, the Title IX Coordinator will coordinate with law enforcement, as needed, to preserve evidence and achieve other shared goals. At the request of a law enforcement agency, Cleveland Clinic may temporarily delay an investigation while the law enforcement agency gathers evidence; however Cleveland Clinic is required to pursue an administrative response to a report regardless of whether a law enforcement investigation is also pursued. Notwithstanding any temporary delay of the investigation, Cleveland Clinic will provide resources to the complainant and respondent and will implement supportive measures deemed necessary to protect the parties and the Cleveland Clinic community.

CCPD Non-Emergency Phone Number: 216.444.2250

Email: [ccpd@ccf.org](mailto:ccpd@ccf.org)

Confidential Resources: Cleveland Clinic employees who are professional counselors, pastoral counselors or health care providers are considered confidential resources when they are serving in their capacities as counselors or health care providers, as are any employees designated as confidential resources. Confidential resources are not required to make reports to the Title IX Coordinator. They are available to provide advice, support, and guidance about how to manage an incident of prohibited conduct without initiating a response by Cleveland Clinic. A report to a confidential resource is not considered a report to Cleveland Clinic.

[Professional Staff Assistance Program/ Licensed Professional Health Program/ Employee Assistance Program:](#)

Ohio: 216-445-6970 or 1-800-989-8820

Florida: 1-800-899-3926

Nevada: 1-800-280-3782

Anonymous Reporting: Reports of prohibited conduct may be made anonymously through Cleveland Clinic's [anonymous compliance reporting hotline and email reporting system](#). Reports made through the anonymous reporting system will be sent directly to the Title IX Coordinator or their designee. The Title IX Coordinator will address the report to the extent possible with the information provided.

Outside Agencies: Complaints of Title IX violations may be made to the U.S. Department of Education Office of Civil Rights (OCR) or other state or federal agency with jurisdiction over the relevant educational program or activity. Information on how to file a complaint with OCR is available on its website: <https://www2.ed.gov/about/offices/list/ocr/docs/howto.html?src=rt>.

#### Duty to Report

All Responsible Employees who become aware of information that leads them to reasonably believe that a participant in an educational program or activity has been subject to prohibited conduct must promptly make a report to the Title IX Coordinator. Employees with a duty to report must provide as much information as they have regarding the incident and may not report anonymously. All other Cleveland Clinic employees, except confidential resources, are strongly encouraged to make such a report.

Employees of schools, colleges and universities whose students participate in Cleveland Clinic educational programs and activities are encouraged, and in some cases required by agreement, to report to Cleveland Clinic's Title IX Coordinator any information that leads them to reasonably believe that a participant in a Cleveland Clinic educational program or activity has been subject to Prohibited Conduct under the Policy.

## **Confidentiality**

Cleveland Clinic will maintain the confidentiality of reports to the extent reasonably possible consistent with its responsibility to provide a safe educational and work environment, to provide a prompt, fair and impartial resolution of the report and to comply with applicable laws related to reporting. All individuals involved in the resolution of a report are expected to treat all related information as confidentially as possible. Notwithstanding the obligation of confidentiality, the parties may share information related to a report or investigation with their respective support people, advisors and others providing support or assistance to the extent necessary to enable those individuals to provide effective support, advice and assistance.

Cleveland Clinic will comply with a complainant's request to remain anonymous, or that an investigation not be initiated, if it is possible to do so while also protecting the health and safety of the complainant and the Cleveland Clinic community.

- In such circumstances, Cleveland Clinic may nonetheless take appropriate steps to eliminate the reported conduct, prevent its recurrence and remedy its effects on the complainant and the Cleveland Clinic community.
- Cleveland Clinic will initiate an investigation if, in its sole discretion, it determines that doing so is necessary to protect the health and safety of the complainant or the Cleveland Clinic community based on the seriousness of the alleged conduct, whether the respondent has been involved in other incidents of misconduct, whether the complainant is a minor, and other relevant information.

The Office of Professional Staff Affairs will be notified if a report involves a member of the professional staff.

## **Rights of Parties**

Complainants and respondents have the right to be treated with dignity and respect, consistent with Cleveland Clinic's obligation to respond adequately to a report and to hold community members accountable for their conduct. To that end, complainants and respondents have the following specific procedural rights:

- To request and receive supportive measures as appropriate.
- To have a support person or advisor of their choice present during any meeting or process related to a report of prohibited conduct. The support person or advisor may not be a party or witness to the report. The support person or advisor may attend and advise the party, but shall not actively participate or stand in place of the party.
- To participate fully in the informal and formal resolution processes set forth in these procedures as applicable.
- To decline to participate in any process related to a report. If a party declines to participate, Cleveland Clinic will still respond to a report based on the information available to it.
- To have any investigation into a report conducted by an appropriately-trained

investigator and include an objective evaluation of all relevant evidence in which credibility determinations are not based on an individual's status as a complainant, respondent or witness.

- To receive updates on the progress of an investigation or other process and to be informed of the outcome of any process in a timely manner.
- To not have information considered about sexual predisposition or past sexual conduct, unless the complainant's prior sexual behavior is offered to prove that someone other than the respondent committed the prohibited conduct, or information about specific incidents of the complainant's prior sexual behavior with respect to the respondent is offered to prove consent.

## **Interim Measures**

Upon receipt of a report of prohibited conduct, the Title IX Coordinator may impose appropriate and reasonable measures to ensure equal access to its educational programs and activities and to protect the parties and the Cleveland Clinic community. Interim measures may include supportive measures or interim suspensions when warranted.

Supportive measures are non-disciplinary, non-punitive individualized services that are available to all parties regardless of whether a complainant pursues an informal or formal resolution of the report. Supportive measures may be imposed or changed at any point during the resolution of a report in order to protect the interests of the parties and Cleveland Clinic. Supportive measures will be determined on a case-by-case basis considering all relevant circumstances, including, but not limited to, specific requests by the parties, the severity of the allegations, and whether the parties are in the same educational program or share a job location.

Supportive measures may include, but are not limited to, separating individuals ("no contact" orders), counseling or support services, making alternative class placement or workplace arrangements, leaves of absence, escort services or other safety measures. When changes to educational or working conditions are required, the Title IX Coordinator will work with the relevant institute or program to ensure that supportive measures are feasible and appropriate under the circumstances, and consistent with any related policies or procedures within the institute or program.

In cases where there is an immediate threat to the physical health or safety of any individual arising from a report, an interim suspension is appropriate. When a suspension is considered, the Title IX Coordinator will work with Protective Services, the Law Department and the relevant institute or program to conduct an individualized safety and risk analysis before imposing an interim suspension. Any individual suspended under this provision shall be given the opportunity to immediately appeal the interim suspension to an appropriate decision-maker based on the status of the individual.

Failure to comply with interim measures shall constitute a separate violation of the Policy.

## **Resolution of Reports**

### Formal Complaint

Reports of prohibited conduct may be resolved through an informal resolution process or an investigation upon the filing of a formal complaint. A formal complaint is a written assertion that prohibited conduct occurred. Formal complaints may be submitted to the Title IX Coordinator by complainants participating in, or seeking to participate in, an educational program. In the absence of a formal complaint from the complainant, the Title IX Coordinator may sign a formal complaint to initiate an investigation when there is a health or safety risk to either the complainant or to Cleveland Clinic. A determination whether such a health or safety risk exists shall be made in conjunction with Protective Services, the Law Department and the relevant institute or program.

A formal complaint may be dismissed if the complainant requests to do so in writing to the Title IX Coordinator, if the respondent is no longer affiliated with Cleveland Clinic, or if the Title IX Coordinator determines, in their sole discretion, that specific circumstances prevent Cleveland Clinic from gathering sufficient evidence to reach a determination regarding whether a Policy violation occurred.

### Notice

Upon receipt of a formal complaint, the Title IX Coordinator shall provide notice to all parties that includes, if known, the identities of the parties involved, the conduct allegedly constituting prohibited conduct, and the date and location of the alleged incident. The notice shall include the rights of the parties as set forth above and describe the options for informal resolution and investigation as set forth below. Cleveland Clinic is required by law to include in the notice a statement that the respondent is presumed not responsible for the alleged conduct, that a determination regarding responsibility is made at the conclusion of any investigation, and that knowingly making false statements or submitting false information is a violation of Cleveland Clinic policy.

### Informal Resolution

Cleveland Clinic encourages informal resolution of reports when the parties wish to resolve a report cooperatively, whether or not the conduct in question rises to the level of a Policy violation. Informal resolution may include an inquiry into the facts, but typically does not involve an investigation and will not result in a determination whether the Policy has been violated unless agreed by both parties. Informal resolution may not be used when the complainant is a student and the respondent is an employee who is not also a student or trainee.

Participation in an informal resolution process is voluntary and the parties must agree in writing to participate. Any party may end the informal resolution process at any time before it concludes. Informal resolution may include joint or separate mediation discussions, separation of the parties, referral to counseling programs, targeted education and training programs, or any other steps agreed by the parties. An informal resolution process is expected to take no more



than 30 days.

If the parties agree to informally resolve the report, the matter will be considered closed. The Title IX Coordinator will maintain a record of the resolution, will inform relevant offices or institutes of the outcome, and will monitor implementation of the resolution as appropriate.

## Investigation Process

### Initial Assessment

If a formal complaint has been filed and the parties may not or do not chose to pursue an informal resolution, the Title IX Coordinator will conduct an initial assessment of the allegations in the formal complaint to determine whether the conduct alleged could constitute a violation of the Policy, i.e., whether it meets the definition of prohibited conduct and occurred in locations, events or circumstances over which Cleveland Clinic exercised substantial control over the respondent and the context in which the prohibited conduct occurred. The purpose of the initial assessment is to end the Title IX process if it is clear that the allegations, even if true, would not constitute a Policy violation. An initial assessment may be based on information provided by the complainant or may include a meeting with the respondent and review of any initial information provided by the parties. The initial assessment is expected to take no more than 15 days from the date of the formal complaint, the end of an informal resolution process, or the complainant's request for an investigation, whichever is latest.

If it is determined through the initial assessment that a Policy violation could have occurred, the Title IX Coordinator will pursue an investigation as described herein. If it is determined through the initial assessment that the allegations, even if true, would not constitute a Policy violation, the resolution process under these procedures will conclude. If the allegations in the report may constitute a violation of another Cleveland Clinic policy, the report will be referred to the appropriate office for resolution.

### Investigation

If the initial assessment indicates that a Policy violation may have occurred the Title IX Coordinator will so inform the parties and will assign one or more investigators.

The Title IX Coordinator may serve as the investigator or may appoint an investigator, who may be a Cleveland Clinic employee or an external investigator. All investigators shall have sufficient training and experience to conduct a prompt, thorough and impartial investigation. It is the intention of Cleveland Clinic to complete investigations within sixty (60) days of the appointment of the investigator if possible.

All parties shall have the opportunity to present statements, provide witness names and submit physical, documentary or other evidence to the investigator. Each party may submit questions to the investigator to be asked of another party. The investigator shall also gather and consider any additional evidence the investigator deems relevant.

When the investigator has finished gathering evidence, the investigator will prepare a summary of evidence, including all evidence gathered related to the allegations in the complaint. The parties shall have ten (10) days to review the summary of evidence and respond to it with comments, additional information or a request that additional investigation be conducted. If the investigator receives significant additional information after the summary of evidence has been provided to the parties, that information will also be shared with the parties for their review and response.

Once the summary of evidence has been reviewed by the parties and their feedback has been incorporated, the investigator shall prepare a final investigative report that includes the revised summary of evidence and a recommended determination whether there has been a violation of the Policy. The recommendations shall be made on the basis of a preponderance of the evidence standard. The basis for any recommended determinations shall be set forth in the final investigative report.

If, in the course of the investigation, the investigator determines that a complainant submitted a report that the complainant knew was false, the investigator shall so determine and the report shall be referred to the appropriate conduct process. Good faith reports, even if they are ultimately unsubstantiated, are not considered false reports. If the investigator determines that the conduct investigated may violate another policy in addition to, or instead of, the Policy, the investigator shall forward the investigation report to the appropriate office for appropriate response.

The respondent may, at any time prior to the issuance of the final investigative report, accept responsibility for the conduct being investigated. If the respondent does so, the Title IX Coordinator will refer the report to the appropriate disciplinary official for imposition of any appropriate sanction.

#### Determination Regarding Responsibility

Upon completion of the final investigation report, the Title IX Coordinator will provide the report to the parties and designate a determination panel. The parties shall be given five (5) days to submit written questions for the determination panel to ask of any party or witness, including the investigator. The determination panel shall review submitted questions either in a meeting or through email or other electronic platform. If the questions are relevant and not otherwise prohibited, they will be forwarded to the appropriate party or witness for response within five (5) days. Responses will be shared with the party who submitted the question, who will be given an additional two (2) days for follow-up. This process will continue until all questions have been answered or the determination panel determines that submitted questions are irrelevant, duplicative or otherwise prohibited. If the determination panel decides that a question is irrelevant, duplicative or otherwise prohibited, it will provide an explanation for that decision to the party who submitted the question. If the determination panel decides, based on the volume or nature of the questions submitted, that it would be more efficient or appropriate to meet with the parties rather than forward the questions, it may schedule separate meetings with each party and/or with any of the witnesses. In such circumstances, the determination panel will provide a written summary of responses to the party who asked the questions.

When all responses to questions have been received, the determination panel shall meet and make a final determination whether the Policy has been violated. Throughout the investigation, the respondent shall be presumed “not responsible” unless or until the determination panel makes such a final determination. The final determination shall be based on all relevant information available to the panel, including the investigation report and subsequent questions and answers. If the panel determines that the policy has been violated, it may consult with the respondent’s institute or program as to appropriate remedies.

Sanctions that may be implemented for violations of the Policy include expulsion, dismissal or termination of appointment; suspension; disciplinary probation; reprimand; restitution; restrictions on contact with other parties; restrictions on access to facilities, services or programs; community service; specified training or education; or alternative sanctions, such as completing anger management or batterer intervention courses, performing volunteer work, writing essays, completing a 12-step or other addiction program, completing a sex offender rehabilitation program, issuing a sincere apology, and any other remedy appropriate for the circumstances.

At the conclusion of its deliberations and consultations, the panel shall issue a written determination to the parties including findings of fact, written explanations for all determinations and the sanctions to be imposed. If no appeal is filed, this determination shall become effective within five (5) days of its submission to the parties. In fulfilling any of its responsibilities, the determination panel may consult with the Law Department for guidance.

## **Appeal**

Either party may appeal the determination panel’s decision to the Chief Academic Officer. The appeal must be filed with the Title IX Coordinator within five (5) business days of issuance of the written determination. The basis for appeal may be:

1. That these Procedures were not followed and the failure to follow the Procedures materially adversely affected the outcome;
2. That new evidence exists that was not reasonably available at the time the determination regarding responsibility was made and the new evidence could materially affect the outcome;
3. The Title IX Coordinator, investigators, or determination panel members had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that materially adversely affected the outcome.

The Title IX Coordinator will provide the other party with a copy of the appeal. The other party may submit a response to the appeal within five (5) business days of receipt. The Chief Academic Officer or designee will conduct a review of the investigative record, the appeal and the response, if any, and issue a final decision. The Chief Academic Officer or designee may uphold the investigator’s determination, may reverse the determination, or may require additional investigation. In fulfilling their responsibility, the Chief Academic Officer or designee may consult with the Law Department for guidance.

## **Regulatory Requirement/References**

[Title IX of the Education Amendments of 1972 \(as amended by the 1988 Civil Rights Restoration Act\)](#)

[Violence Against Women Reauthorization Act of 2013](#)

[34 CFR, Part 106](#)

[34 CFR, §668.46](#)

## **Oversight and Responsibility**

The Chief of Academic Office and Title IX Coordinator are responsible to review, revise, update, and operationalize this procedure to maintain compliance with regulatory or other requirements.

## **Other Background Information**

### **Reviewed by:**

- Institute Chairs, GME Program Managers, and Allied Health Internal Program Managers.

## **Title IX/ Section 504 Advisory Team Members**

|                   |   |
|-------------------|---|
| Roy Anderson      | Education Institute                         |
| Angela Cain       | Community Outreach                          |
| Diane DeCamillo   | Chief Academic Office                       |
| Cheryl Goliath    | Cleveland Clinic Akron General              |
| Susan Hastings    | Law Department                              |
| Mari Knettle      | Center for Health Sciences Education        |
| Julie Marth       | Protective Services                         |
| Kathleen Mau      | Nursing Education                           |
| Christine Moravec | Lerner Research Institute                   |
| Lori Smith        | Graduate Medical Education                  |
| Christine Warren  | Cleveland Clinic Lerner College of Medicine |
| Stephen Webster   | Human Resources                             |