

Princeton External Review Report
Executive Summary
October 2019

In response to concerns raised by students in May 2019, Princeton commissioned an external review of the University's Title IX practices and procedures, with a particular focus on the student perspective. Provost Deborah Prentice selected the following individuals to comprise the review team:

- Amy Adelman, Deputy General Counsel, Office of the General Counsel, Emory University
- Howard Kallem (Ret.), formerly the Director for Title IX Compliance, Office for Institutional Equity, Duke University
- Laura Rugless, Executive Director and Title IX Coordinator, Equity and Access Services, Virginia Commonwealth University

The Provost issued a charge encompassing seven areas of inquiry (described below) and also encouraged the review team to follow where the information led. However, to produce a public report and protect the privacy of those students involved in the Title IX process, the review team did not examine individual case files or information about specific investigations. The team conducted its independent evaluation based upon extensive interviews of administrators, faculty, staff, and students; a comprehensive review of University documents, websites, and other materials; and benchmarking with a number of institutions of higher education.

Title IX prohibits discrimination on the basis of sex/gender (including sexual misconduct) in education programs or activities which receive federal financial assistance. Government agencies and courts enforce Title IX against schools, including colleges and universities, requiring them to meet certain minimum requirements. Universities could stop there. Or universities can choose to do more to create safer and more welcoming environments by implementing robust programs for prevention and response. Many universities have moved in this direction, particularly over the past five years with increased attention to campus sexual assault. Princeton is among them.

But doing more will not immunize a university from being held accountable by its campus community, nor should it. The standards of accountability are not always objective, however, and instead can be based upon perceptions of responsiveness to the individual needs of those involved in the process. This is a particularly challenging "metric" for any university because students in the Title IX process often are in crisis and their needs can be quite different from

those of other students or in other processes. Yet, seeking to understand and meet these needs can engender trust, and trust encourages students to come forward to report their experiences. The concerns raised by the recent protests indicate that, in certain respects, some students feel that the University is not meeting student needs.

In light of the student concerns and the sensitivities and considerations unique to Title IX, the review team was asked to evaluate seven important areas: (1) dissemination of information about the Title IX policy, procedures, practices, and resources (2) in-person support for the parties and witnesses in the Title IX process; (3) confidential resources; (4) transparency of the Title IX process; (5) handling and balancing conflicting needs of the parties and witnesses in the Title IX process; (6) sexual misconduct prevention efforts; and (7) interim measures. The 25-page report details and synthesizes information in response to these charge areas; highlights the strengths and promising practices of Princeton's program; and presents recommendations/suggestions related to Resources and Infrastructure; Communications and Community Engagement; and Accommodations, Conflicting Needs, and Resolution Models.

Overall, the team discovered that the University has a strong Title IX infrastructure. Training about Title IX and the University's expectations begins before students arrive on campus, and students cannot register for classes until they have completed the training; information about options that are available to students experiencing sexual misconduct is disseminated widely; the Title IX complaint process is designed to ensure that students have access to information through multiple channels and the ability to provide input about the investigation before an outcome is reached; the University has highly trained investigators and advisers, and a process that ensures that penalties are consistent and not arbitrary; and students are able to obtain accommodations and interim measures fairly easily.

The review team also learned that, despite the objective strengths of Princeton's Title IX infrastructure, some students feel that their needs are not being met. For example, while information about the Title IX process is disseminated widely, the team heard concerns that the information is not always clear and can be inconsistent and inaccessible, particularly for students in crisis. Some students believe that there should be more options for counseling, greater consistency in accommodations, increased transparency and information about the complaint process, and increased and more accessible communication and support during that process, as well as alternative methods to resolve complaints. The team also identified a need to assess capacity and resources for the Title IX Office and SHARE; enhance training, awareness, and information sharing with the University community; and improve upon support services and

coordination across partner offices and individuals. The report's recommendations address these and other issues identified during the review.

To be at all successful in preventing and responding to sexual misconduct, a university must commit to continuous improvement — assessment as well as action — and continuous engagement at all levels with consideration of all viewpoints and feedback. In this sense, a Title IX program is never fully built yet can be operating exceptionally well. The review team commends Princeton for its efforts to identify areas where it can better meet the needs of its students, and for considering the team's recommendations.