

Annual Report

September 1, 2023-August 31, 2024

I. Introduction

The [Office of Civil Rights and Title IX Compliance](#)'s (NU-OCR) work primarily falls within four categories: report response, reasonable accommodations for employees with disabilities and pregnancy related accommodations for students and employees, training initiatives, and civil rights compliance data initiatives . In addition, representatives of the office provide proactive consultations to community members who seek to better understand the University's non-discrimination policies or explore ways in which to support equal opportunity in their schools or units.

NU-OCR works to uphold the University's commitment to fostering an environment in which all members of our community are free from discrimination and harassment by:

1. Responding to reports of discrimination, harassment, and sexual misconduct, including by helping students, faculty, and staff understand the University's processes for making such reports, and conducting formal and alternative resolution processes.
2. Providing supportive measures, resources, and resolution options to those impacted by discrimination, harassment, and sexual misconduct.
3. Providing training, consultation, and resources to the University community regarding accommodations based on disability, pregnancy and religion, civil rights data initiatives, and how to respond to reports of discrimination, harassment, and sexual misconduct.
4. Providing and coordinating reasonable accommodations based on disability, pregnancy, and religion.

During the 2023-2024 academic year, NU-OCR oversaw the implementation of the University's Interim Policy on Title IX Sexual Harassment and the Policy on Discrimination, Harassment, and Sexual Misconduct. The [Interim Policy on Title IX Sexual Harassment](#) prohibits Title IX Sexual Harassment, which includes Quid Pro Quo Sexual Harassment; Hostile Environment Sexual Harassment, Title IX Sexual Assault, Title IX Dating Violence, Title IX Domestic Violence, and Title IX Stalking. The University's [Policy on Discrimination, Harassment, and Sexual Misconduct](#) prohibits discrimination and harassment on the basis of race, color, religion, creed, national origin, ethnicity, caste, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, reproductive health decision making, height, weight, or any other classification protected by law in matters of

admissions, employment, housing, or in the educational programs or activities it operates. In April 2024, NU-OCR updated the [Policy on Discrimination, Harassment, and Sexual Misconduct](#) to add three additional protected characteristics – creed, ethnicity, and caste. Additionally, allegations of sexual misconduct that do not fall within the jurisdiction of the Interim Policy on Title IX Sexual Harassment may fall within the jurisdiction of this Policy.

II. Report Summary

NU-OCR is responsible for responding to all reports of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment. NU-OCR is also responsible for responding to reports of discrimination and harassment based on 22 protected characteristics.

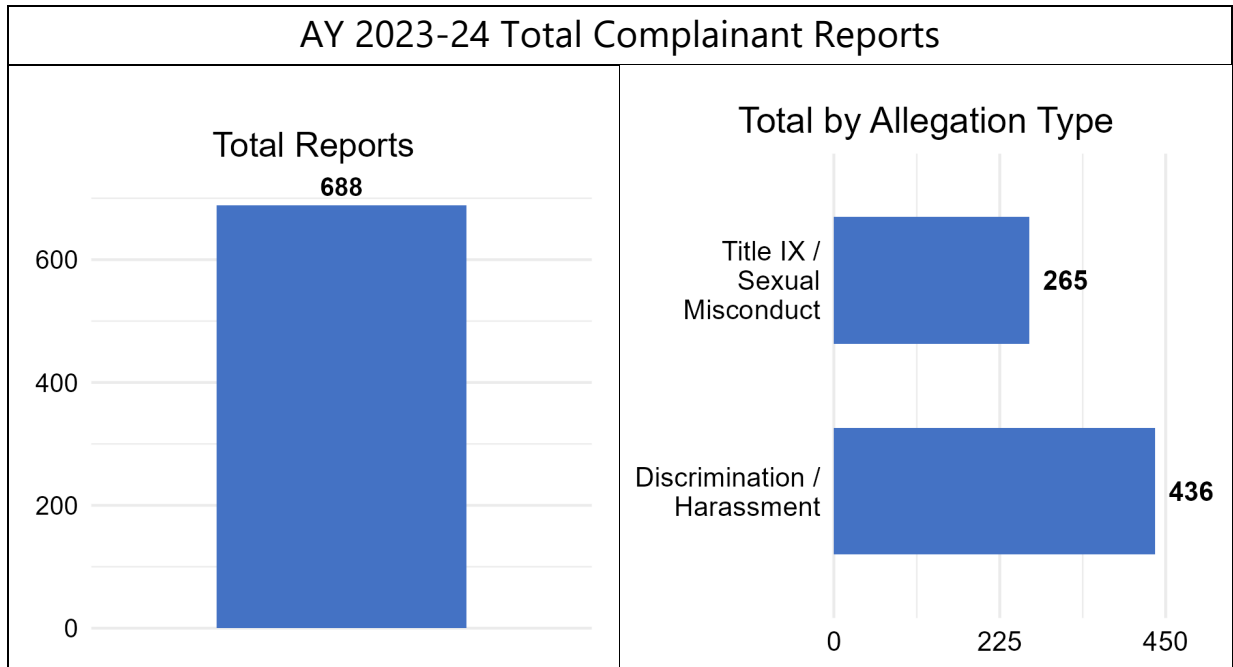
When an incident of alleged discrimination, harassment, or sexual misconduct is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, NU-OCR sends an outreach email to the potentially impacted person(s) to offer information and resources. One of the options that may be available to a person who may have experienced such conduct is a University adjudication of whether a violation of the Interim Policy on Title IX Sexual Harassment or Policy on Discrimination, Harassment, and Sexual Misconduct occurred. Disciplinary action can be taken against any student, staff, or faculty member who is determined to have violated these policies. Northwestern's complaint resolution process for these matters can be found in Section II of the applicable policy.

The following charts present data on the number of discrimination, harassment, and sexual misconduct reports received by NU-OCR, the nature of those reports, and their disposition during the academic year beginning September 1, 2023, and ending August 31, 2024.

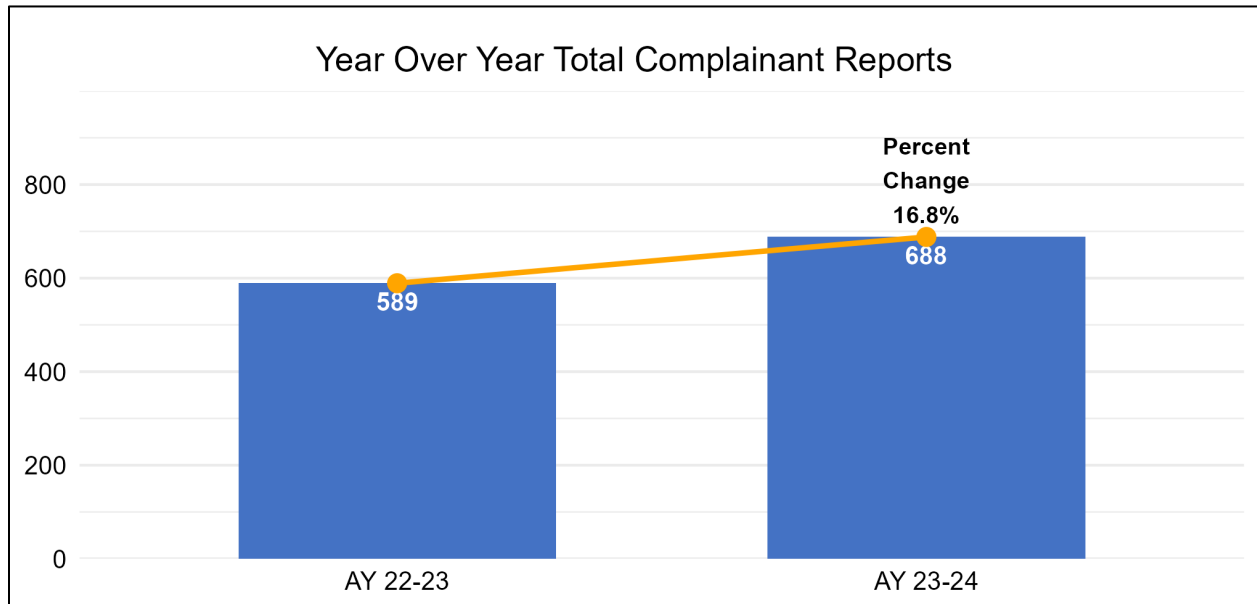
A. Distribution of Complainant Reports by Allegation Type and Affiliation

During the 2023-2024 academic year, NU-OCR received 688 complainant reports of discrimination, harassment, or sexual misconduct.¹ The complainant is defined as the person who is alleged to have been impacted by the reported incident. Reports received can include multiple complainants and thus the total of complainants can vary from the total of reports received. The following chart illustrates the distribution by type of allegation of the reports received by NU-OCR as Title IX/Sexual Misconduct or Discrimination/Harassment. NU-OCR can receive multiple reports about a single incident. In addition, a single report can include multiple allegation types (e.g. discrimination and sexual misconduct), and thus the total of reports by allegation type can be greater than the total of reports.

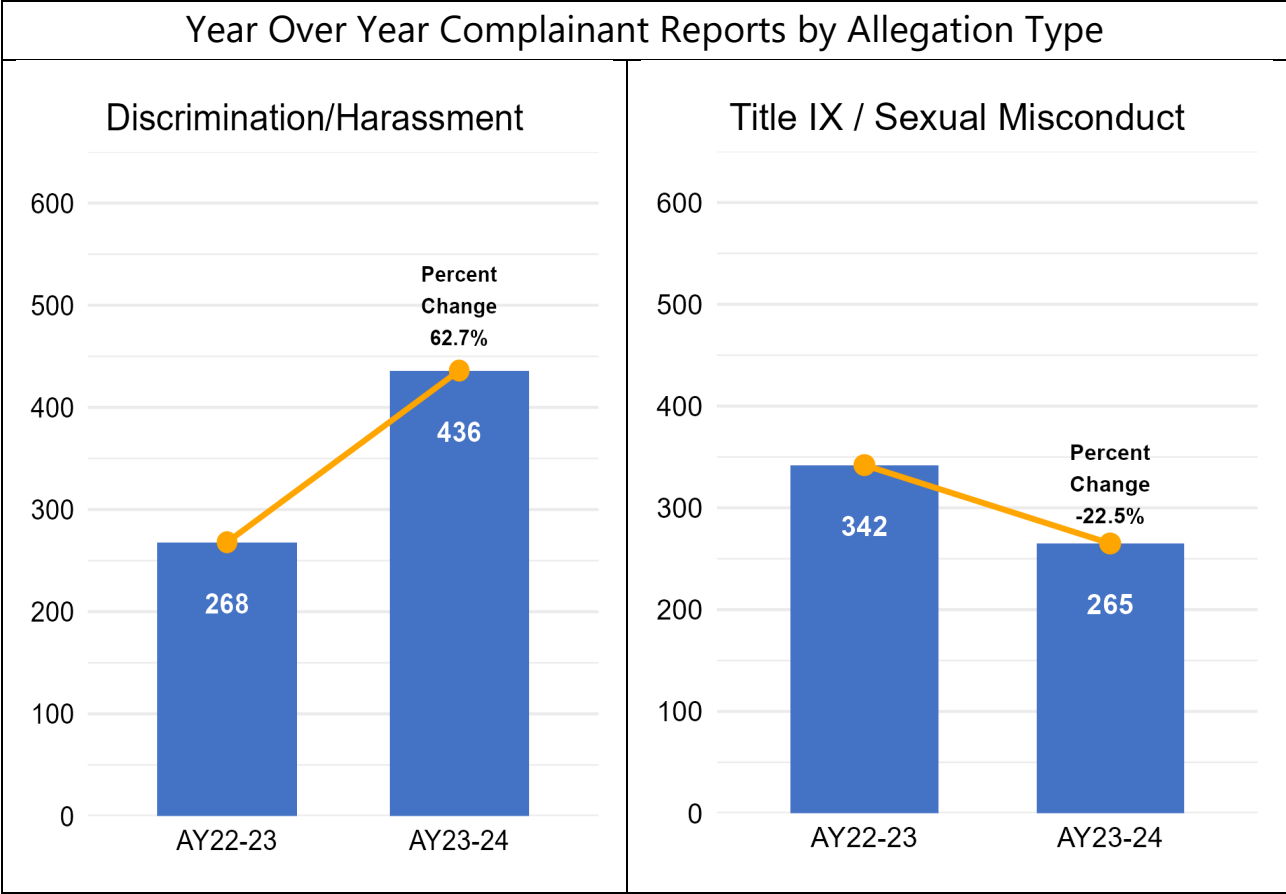
¹ Cases with more than three complainant records were reduced to three to prevent a small number of cases with many associated records from disproportionately influencing overall results. If a case had 3 or fewer records, all records were kept. If a case had more than 3 records, the third record was selected from the role that appears most frequently within the case (ties default to complainant). This approach limits the influence of cases with very large record counts, while preserving the role distribution within each case and the overall structure of the original data.



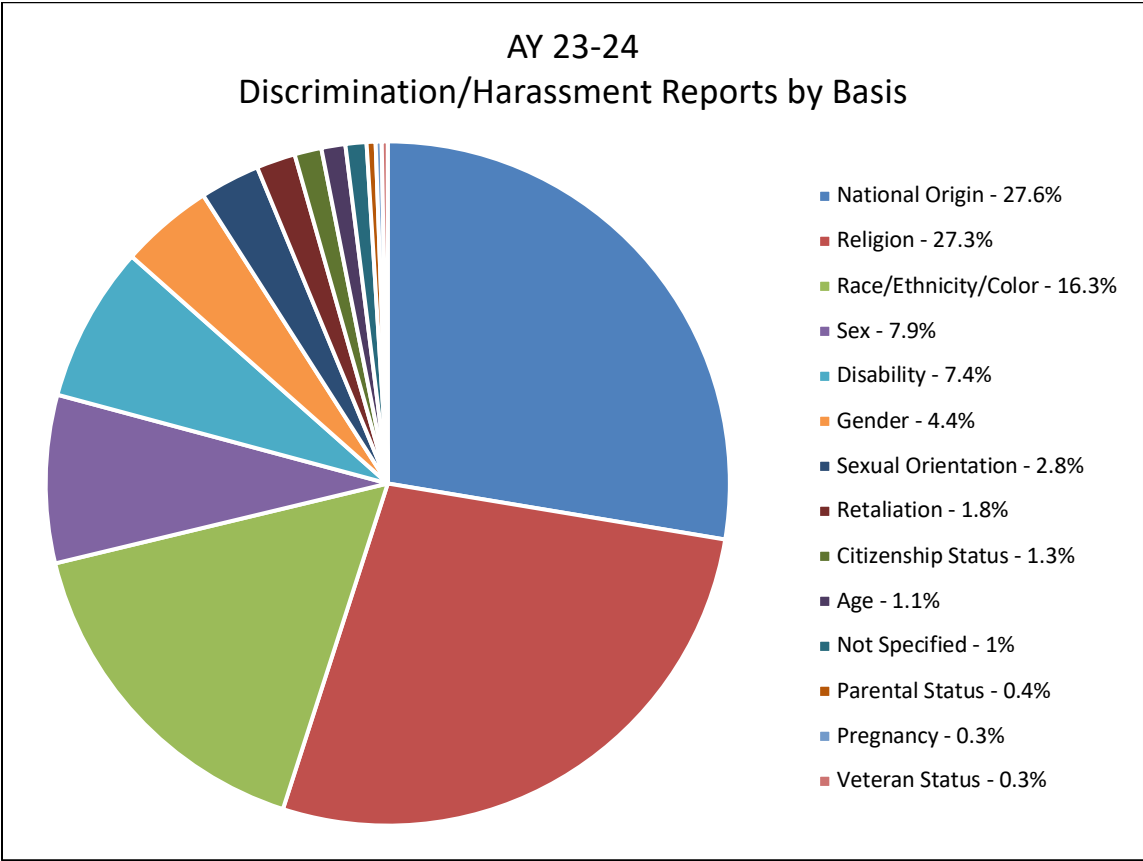
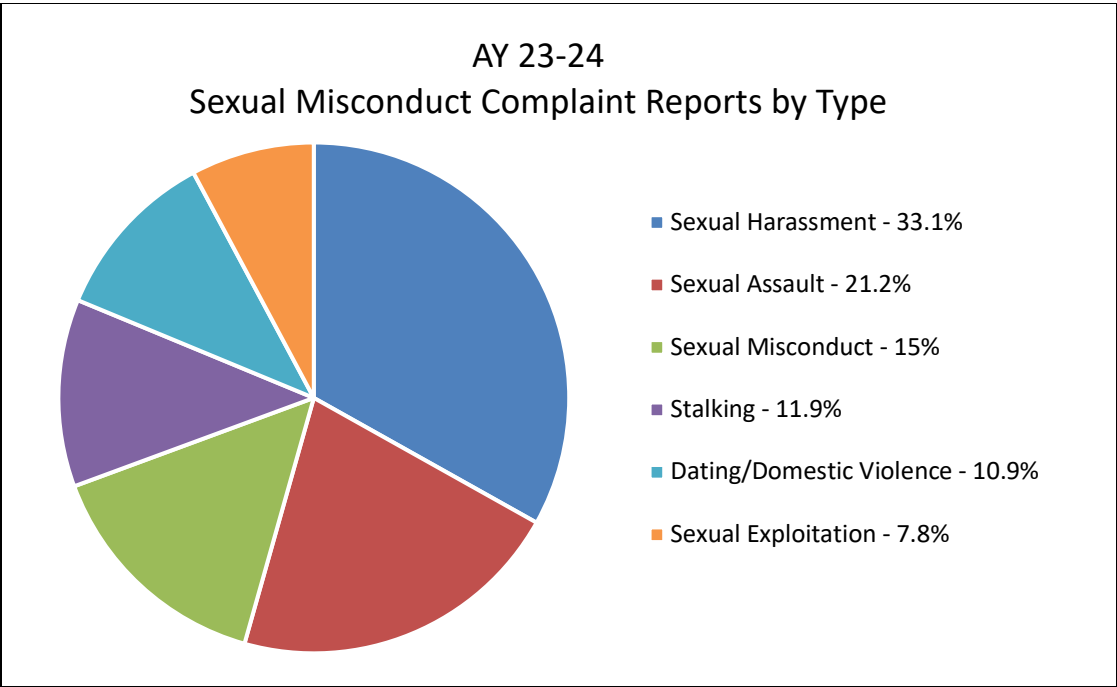
NU-OCR saw an increase in reports in the 2023-24 academic year as compared to the previous year (2022-23). As the following chart shows, the overall number of reports increased by 99 from 589 in 2022-23, to 688 in 2023-24.



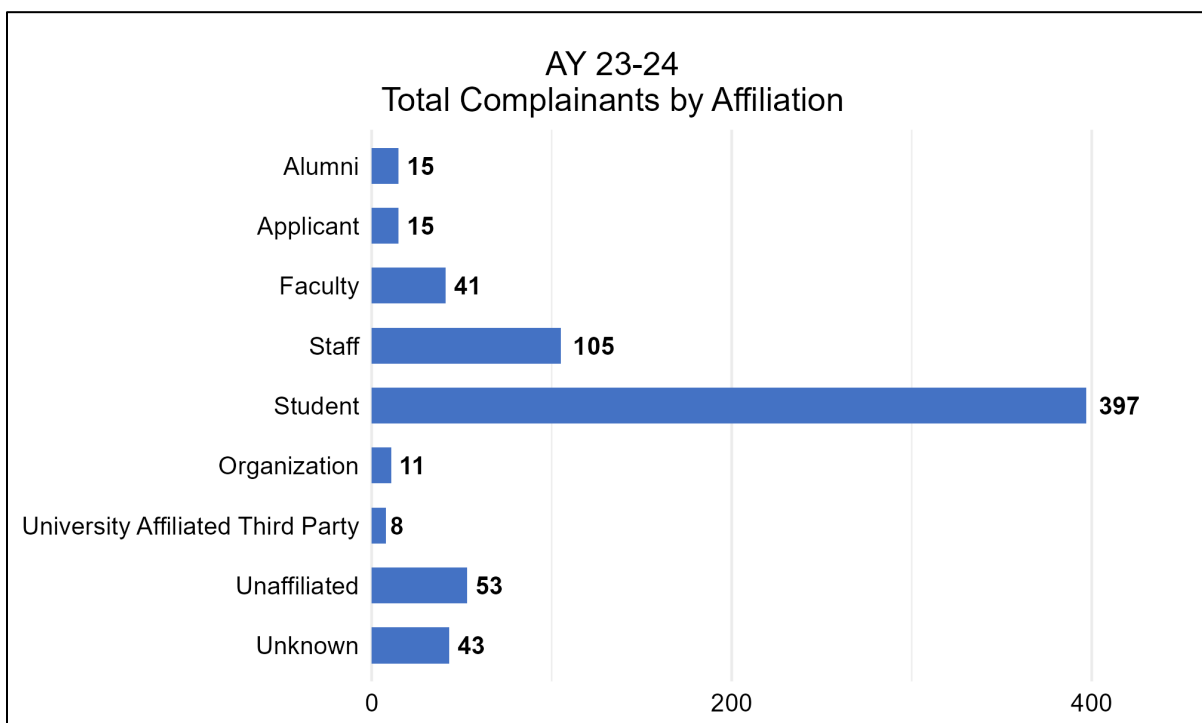
When broken down by allegation type, the number of discrimination and harassment reports increased by 168 – from 268 in 2022-23 to 436 in 2023-24 – and the number of sexual misconduct reports decreased by 77 – from 342 in 2022-23 to 265 in 2023-24.



The following charts present the distribution of the specific categories of sexual misconduct and discrimination/harassment for complainant reports during AY 2023-24. Note that each complainant report could articulate more than one type.



The following chart illustrates the complainant affiliation for each of the reports received by NU-OCR during the 2023-2024 academic year. Of the 688 complainants, 58% were students, 21% were employees, and 14% either had no affiliation with Northwestern or remained unidentified.²



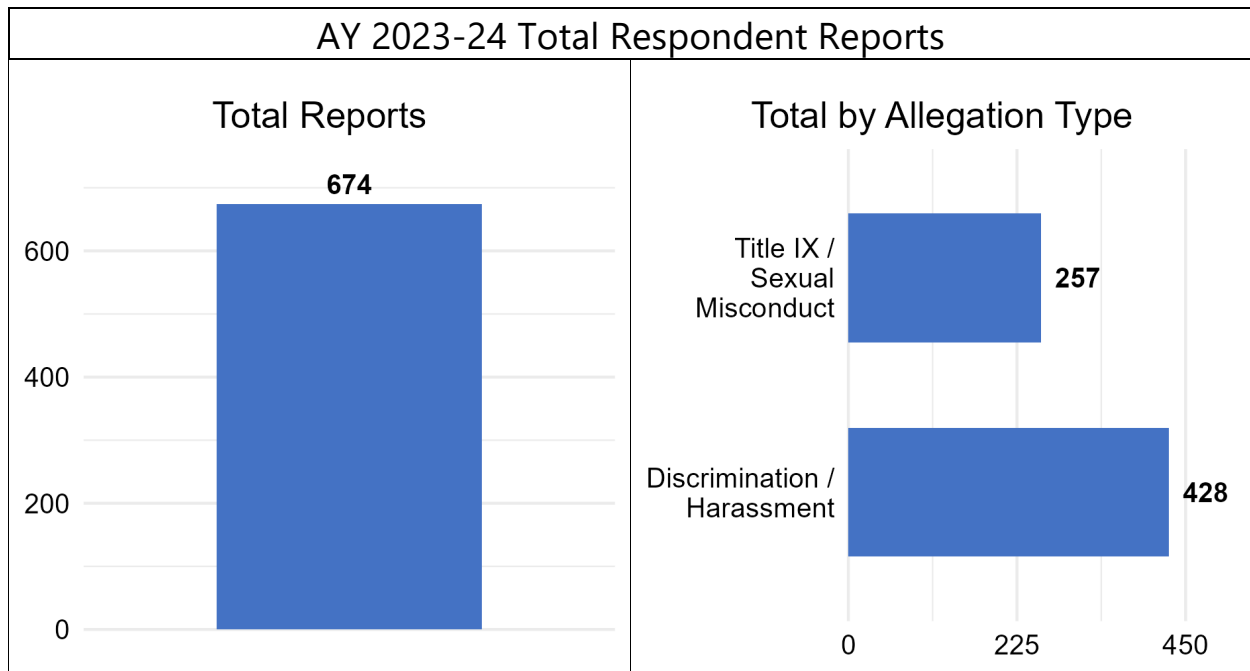
B. Distribution of Respondent Reports by Allegation Type and Affiliation

There were 674 individuals named as respondents in the 688 reports of discrimination, harassment, or sexual misconduct³ received during the 2023-2024 academic year. The respondent is defined as the person who is alleged to have engaged in discrimination, harassment, or sexual misconduct. The following chart illustrates the distribution by type of allegation of the reports received by NU-OCR as Title IX/Sexual Misconduct or Discrimination/Harassment. NU-OCR can receive multiple reports about a single incident. In addition, a single report can include multiple

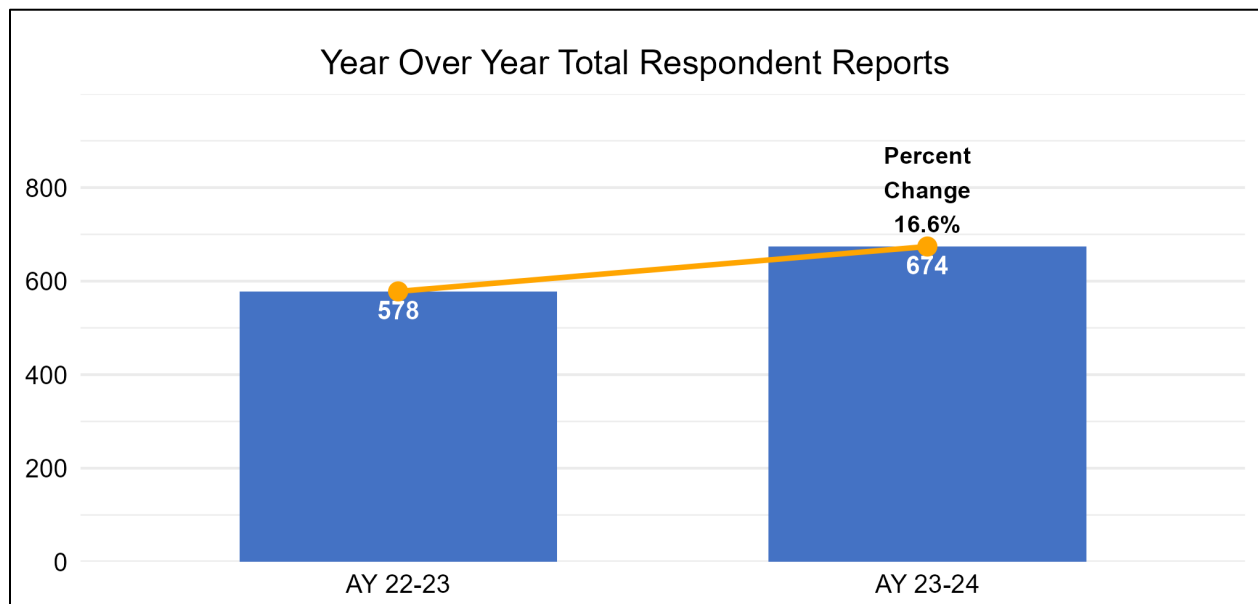
² When Northwestern receives reports from individuals who are unknown or unaffiliated, NU-OCR evaluates the report to discern whether the described conduct impacts Northwestern's working or learning environments and to determine the appropriate response. An appropriate response may, but does not necessarily, include a formal investigation. In all reports in which a complainant can be identified, Northwestern offers support and resources to the impacted individual(s). In reports where a complainant cannot be identified, Northwestern may take steps within its control to eliminate, prevent, and address the reported conduct.

³ Cases with more than three records were reduced to three to prevent a small number of cases with many associated records from disproportionately influencing overall results. If a case had 3 or fewer records, all records were kept. If a case had more than 3 records, the third record was selected from the role that appears most frequently within the case (ties default to complainant). This approach limits the influence of cases with very large record counts, while preserving the role distribution within each case and the overall structure of the original data.

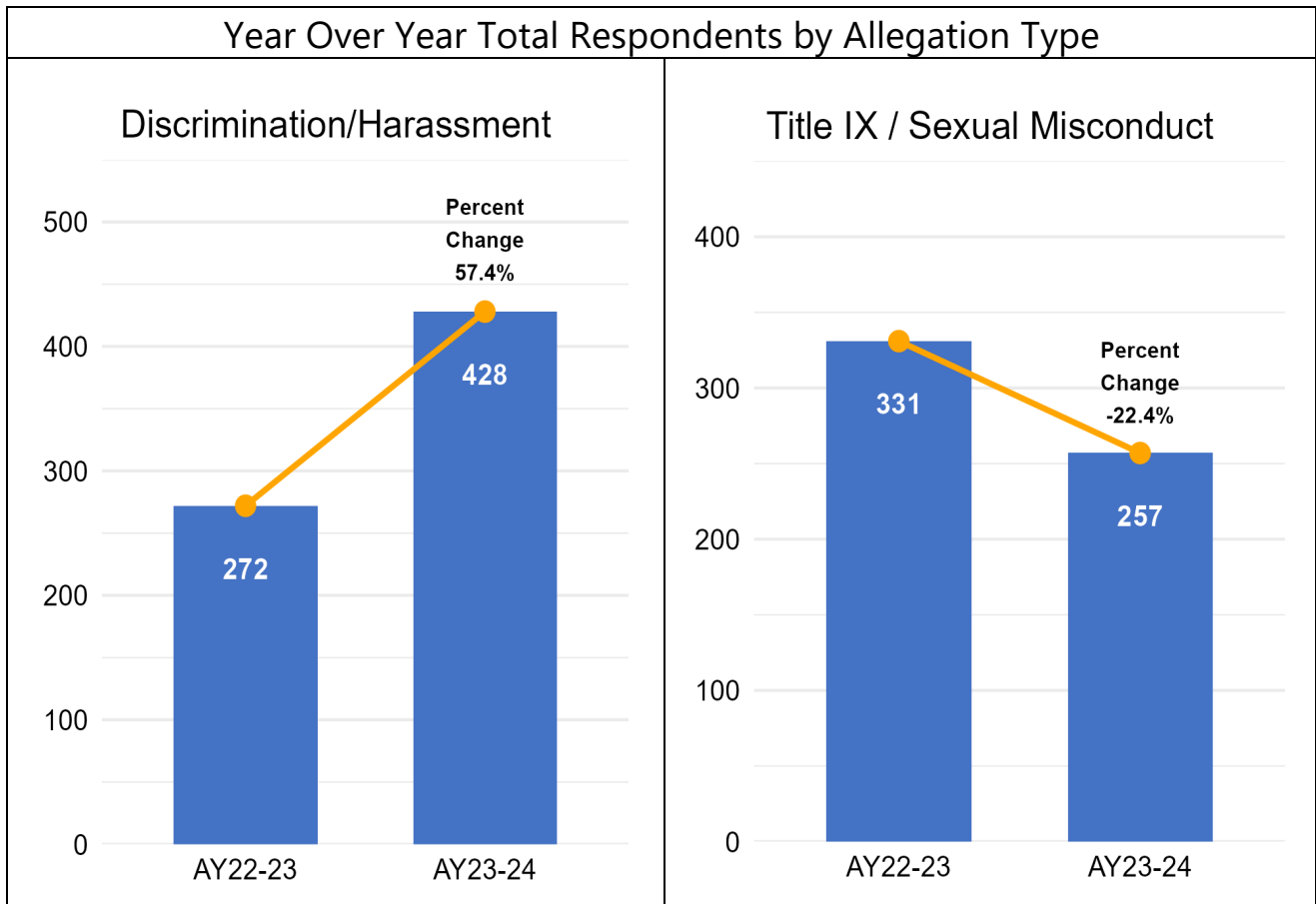
allegation types (e.g. discrimination and sexual misconduct), and thus the total of reports by allegation type can be greater than the total of reports.



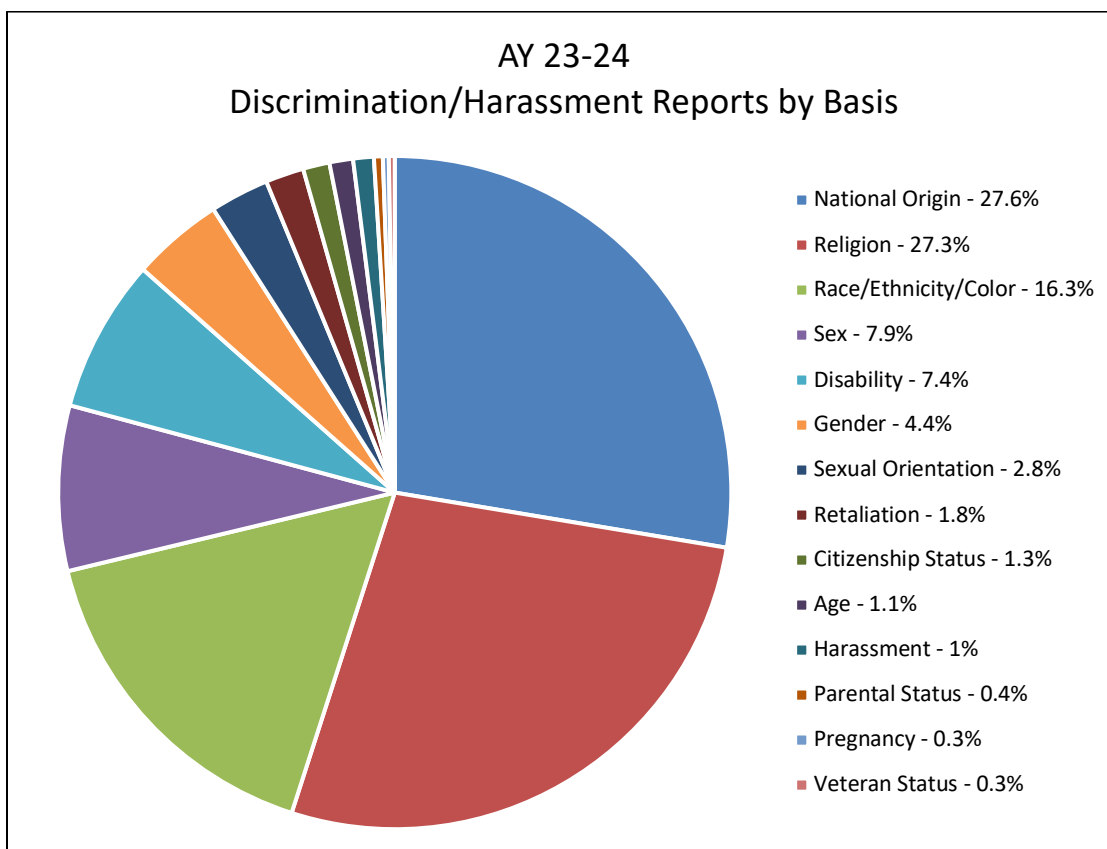
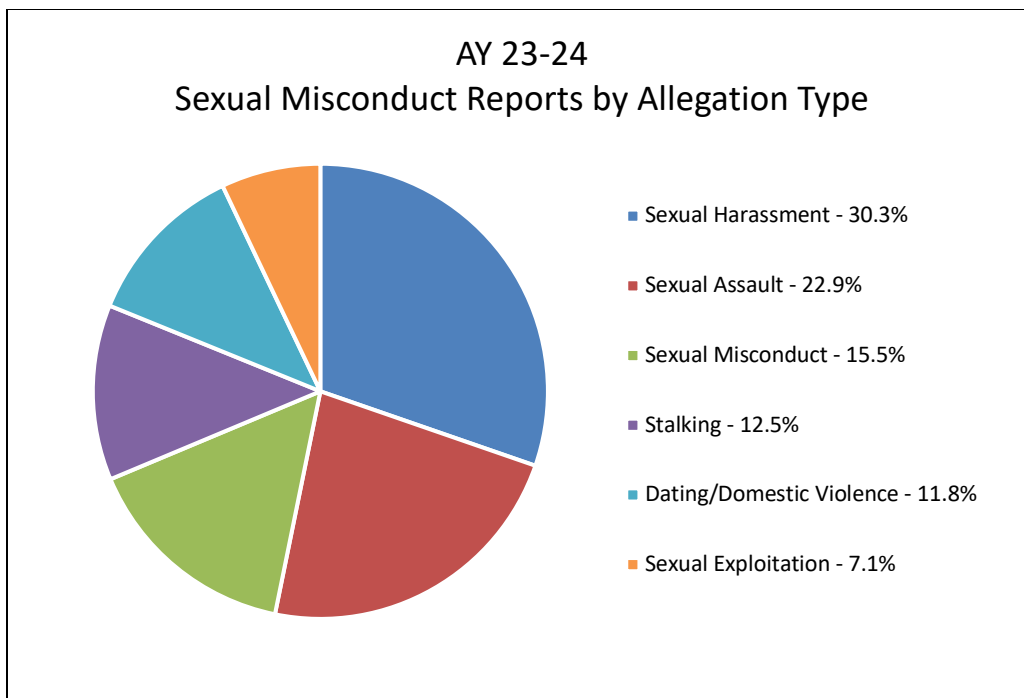
NU-OCR saw an increase in respondents in the 2023-24 academic year as compared to the previous year (2022-23). As the following charts represent, the overall number of respondents increased by 96 from 578 in 2022-23, to 674 in 2023-24.



When broken down by allegation type, the number of discrimination and harassment respondents increased by 156 – from 272 in 2022-23 to 428 in 2023-24 – and the number of sexual misconduct respondents decreased by 74 – from 331 in 2022-23 to 257 in 2023-24.

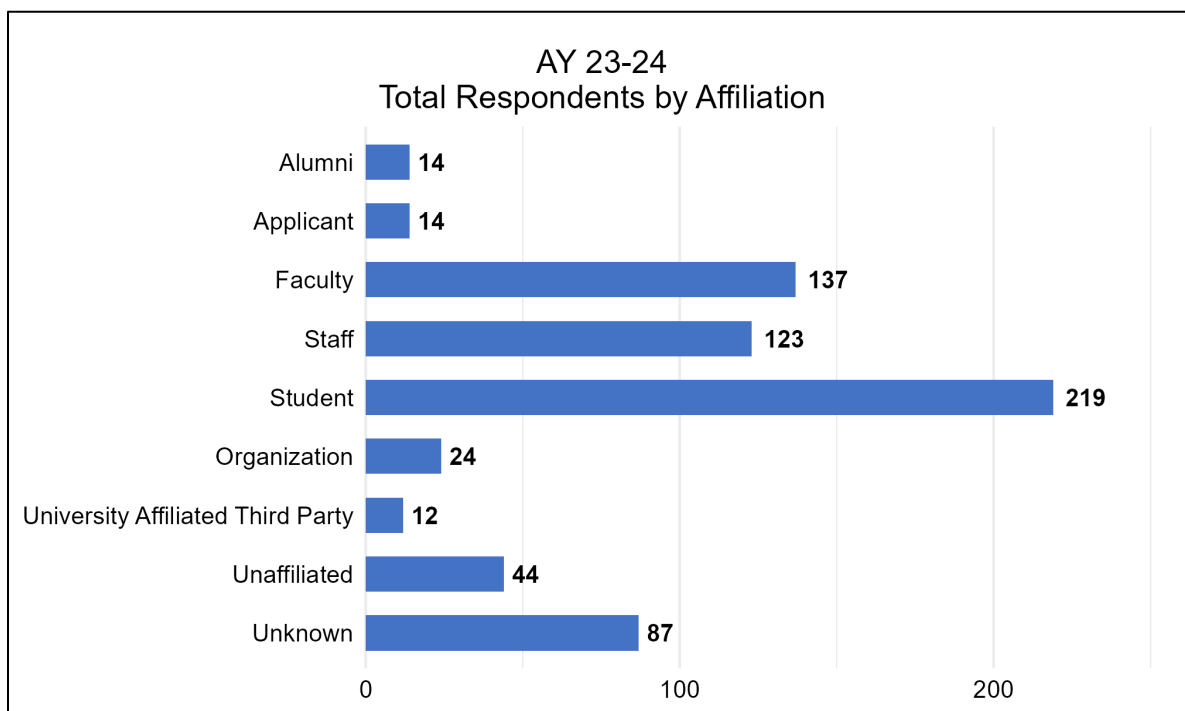


The following chart presents the distribution of the specific categories of sexual misconduct and discrimination/harassment for respondents reports during AY 2023-24. Note that each report could articulate more than one charge.



The following chart illustrates the respondent affiliation for each of the reports received by the NU-

OCR during the 2023-24 academic year. Of the 674 respondents, 131 (19.4) were individuals not affiliated with Northwestern or individuals whose identity was unknown. For example, this includes reports about behavior by unaffiliated dating/domestic partners as well as incidents occurring off campus by non-Northwestern community members.⁴

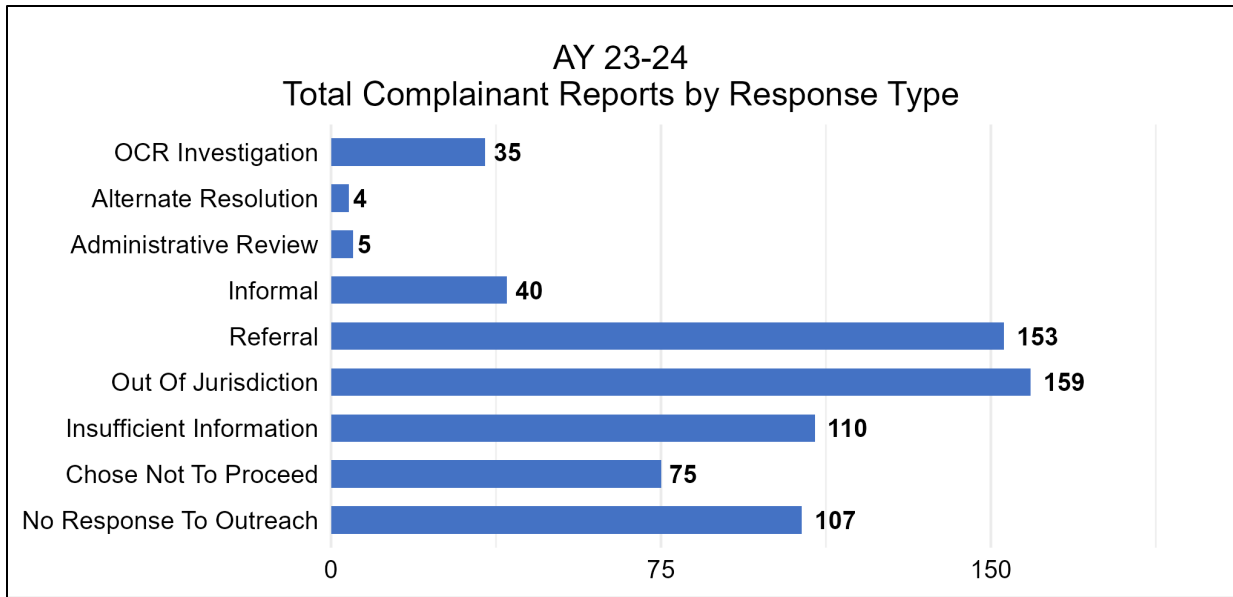


III. Report Responses

A. All Responses

The following chart summarizes the response to the 688 complainant reports of sexual misconduct, discrimination, or harassment during AY 2023-24.

⁴ When Northwestern receives reports alleging misconduct by unidentified persons, or persons not affiliated with the University (and not otherwise connected to a University program or activity), support and resources are offered to the impacted individual(s) and other measures that may be needed to secure the safety of the community are taken; however, in most circumstances, the University will not conduct an investigation.

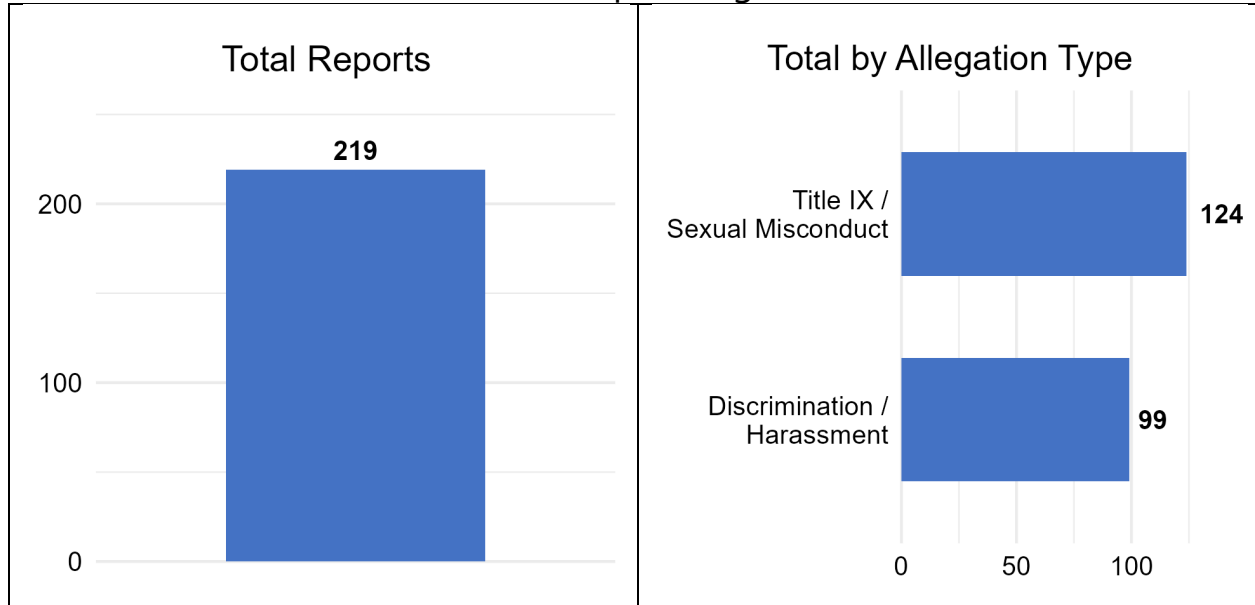


B. Student Respondents

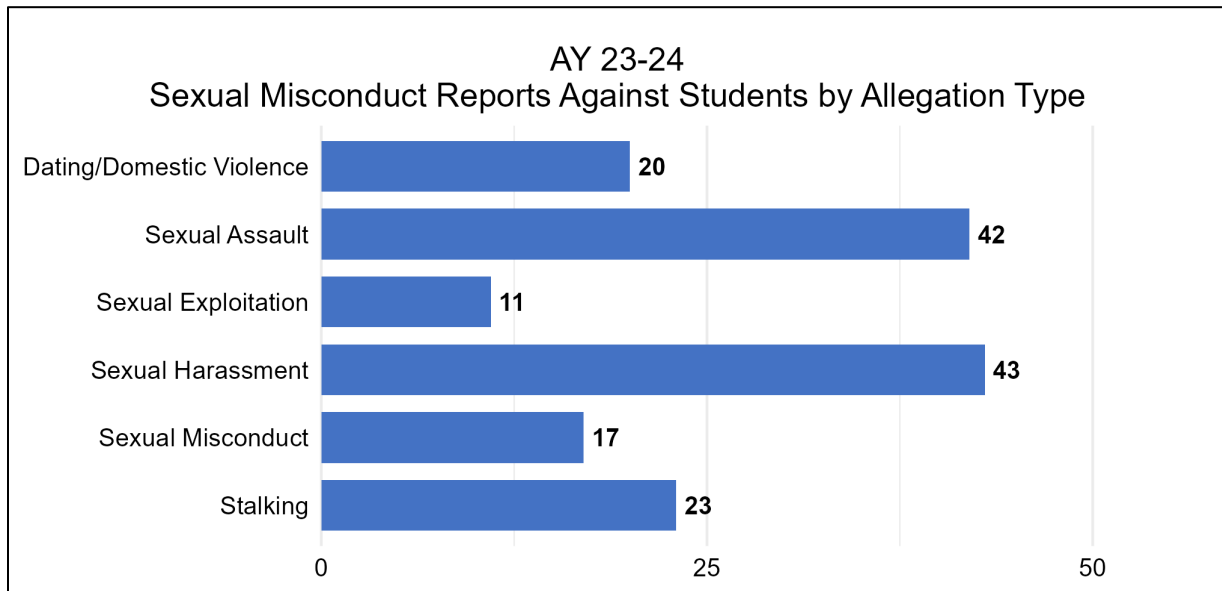
1. AY 2023-24 Summary

Of the 688 complainant reports received during the 2023-2024 academic year, 219 (31.8%) listed students as the respondent. The following charts summarize the total number of reports with a student listed as the respondent and provide a breakdown of those reports by allegation type. NU-OCR can receive multiple reports about a single incident. In addition, a single report can include multiple allegation types (e.g. discrimination and sexual misconduct), and thus the total of reports by allegation type can be greater than the total of reports.

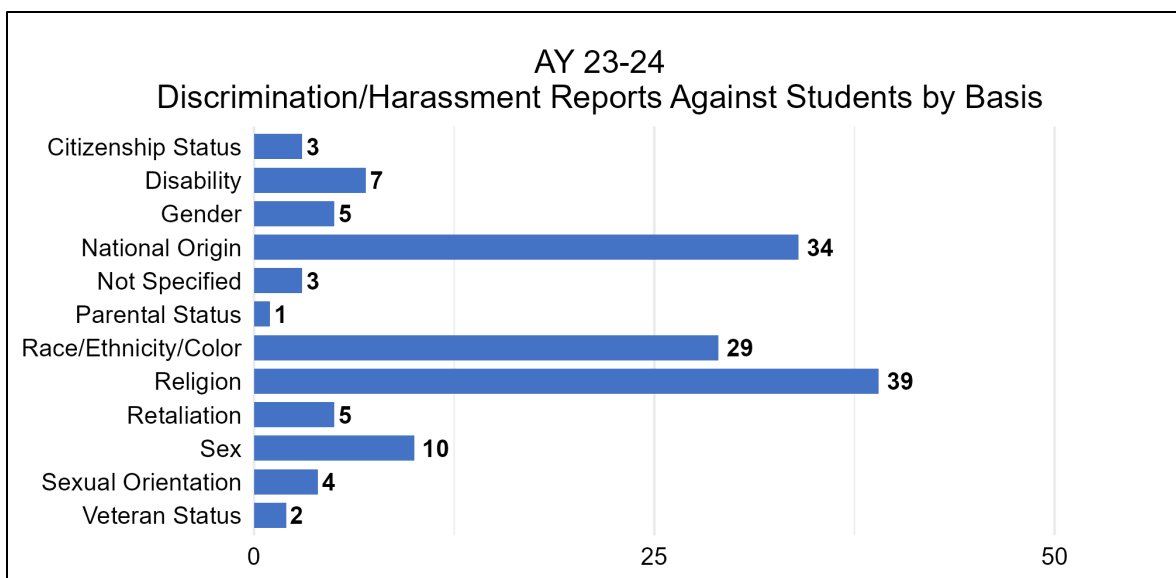
AY 2023-24 Total Reports Against Students



The following chart presents the distribution of the specific categories of sexual misconduct for the 124 complainant reports that list a student as the respondent. Reports can include more than one allegation type and thus the total across allegation types is 156 for AY 2023-24.



The following chart presents the distribution of the specific bases of discrimination and harassment for the 99 complainant reports that list a student as the respondent. Reports can include more than one basis type and thus the total across basis types is 142 for AY 2023-24.



2. How Complainants Elected to Proceed

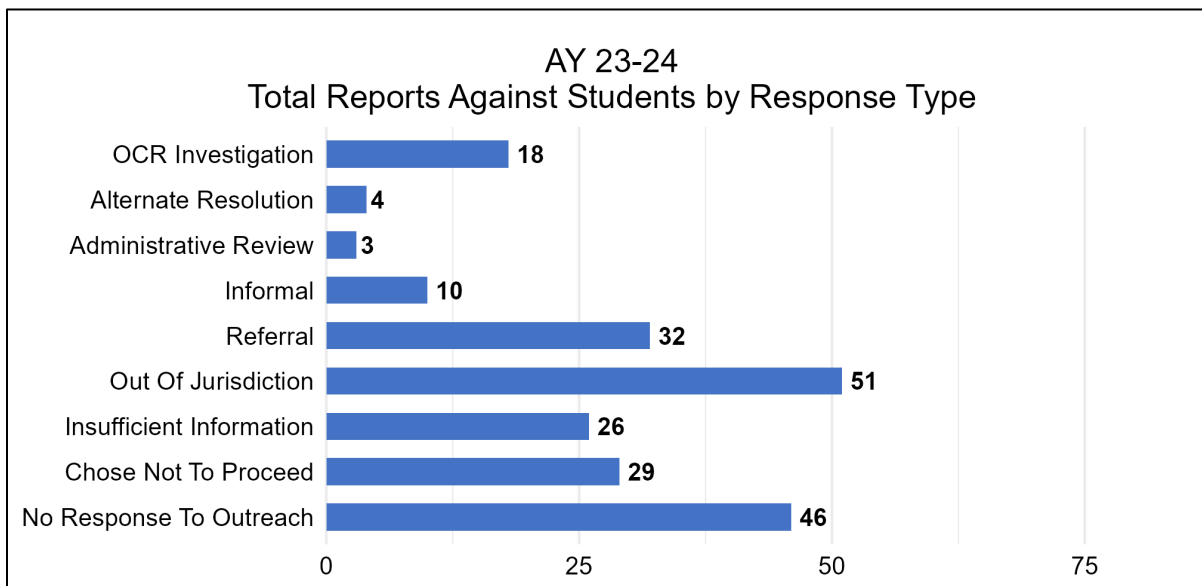
When a report is received from any source, including directly from impacted individuals and indirectly through others, such as employees who are required to report such information to the University, NU-OCR reaches out to the individual(s) who may have been impacted (“experienced misconduct” relates to one allegation class) to make them aware of resolution options and resources available to them. In cases where an impacted individual requests anonymity or does not wish to proceed with an investigation, NU-OCR will attempt to honor that request but, in some cases, NU-OCR may determine that it needs to proceed with an investigation. NU-OCR bases this decision on factors outlined in the policy.

In such cases where NU-OCR initiates an investigation, NU-OCR will not compel an individual to participate. Individuals impacted by discrimination, harassment, or sexual misconduct may request supportive measures from NU-OCR even if they do not choose to participate in the University’s Complaint Resolution Process.

The following chart illustrates how the 219 reports against students were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a student and there was reasonable information to suggest a potential policy violation may have occurred, the case was handled through **formal resolution**, which involved investigation and, in some cases, a sanctioning panel.

In some cases where the complainant did not desire formal resolution or when there was not enough information to proceed with formal resolution, **informal action** was used to prevent incident recurrence and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included mutual no-contact

directives or educational or advisory meetings with respondents. In addition, NU-OCR may refer a case to another unit or department for action where appropriate.

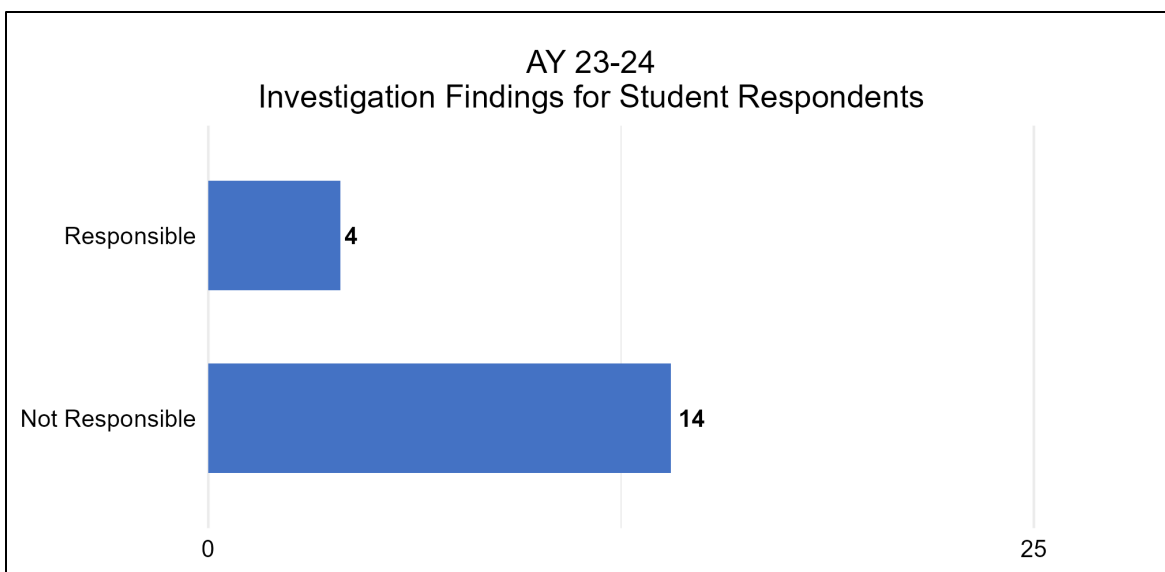


3. Outcomes in Adjudicated Student Cases

In reports with a student respondent that proceeded through formal resolution, NU-OCR conducted formal investigations, using staff members (Civil Rights and Title IX Specialists) or external investigators. In matters where a policy violation was found, the matter was resolved by **a sanctioning panel** facilitated by the Office of Community Standards University Hearing and Appeals System.

The following chart illustrates adjudication outcomes for the 18 student respondents in cases that proceeded through the formal resolution process during the 2023-24 academic year.⁵

⁵ In cases where a student was alleged to have violated multiple categories of the policies, or to have acted against multiple complainants, the outcome is listed as “Not Responsible” only when the student was found Not Responsible for *all* sexual misconduct allegations against *all* complainants.

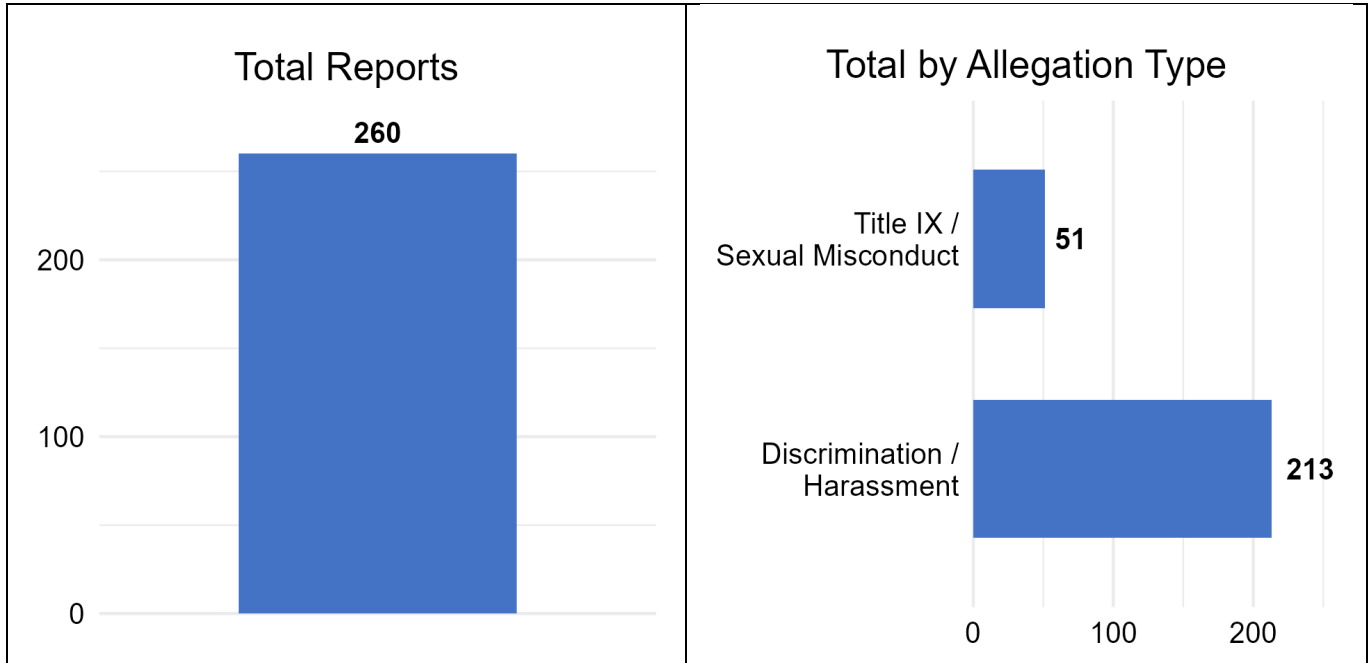


B. Faculty and Staff Respondents

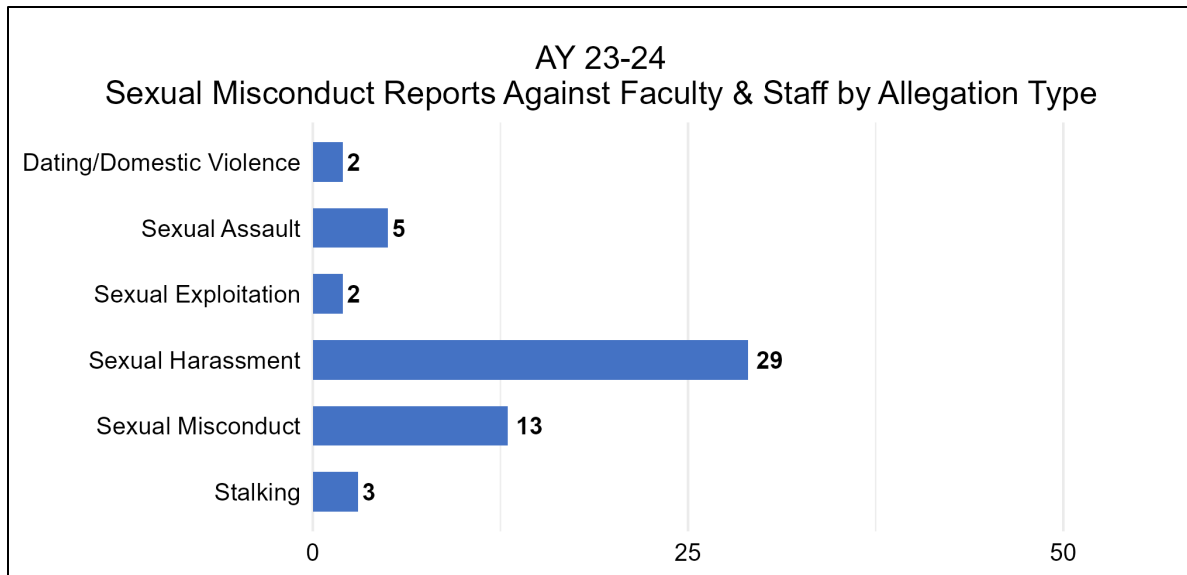
4. AY 2023-24 Summary

Of the 688 complainant reports received during the 2023-2024 academic year, 260 (37.5%) listed a faculty or staff member as the respondent. The following charts summarize the total number of reports with a faculty or staff member listed as the respondent and provide a breakdown of those reports by allegation type. NU-OCR can receive multiple reports about a single incident. In addition, a single report can include multiple allegation types (e.g. discrimination and sexual misconduct), and thus the total of reports by allegation type can be greater than the total of reports.

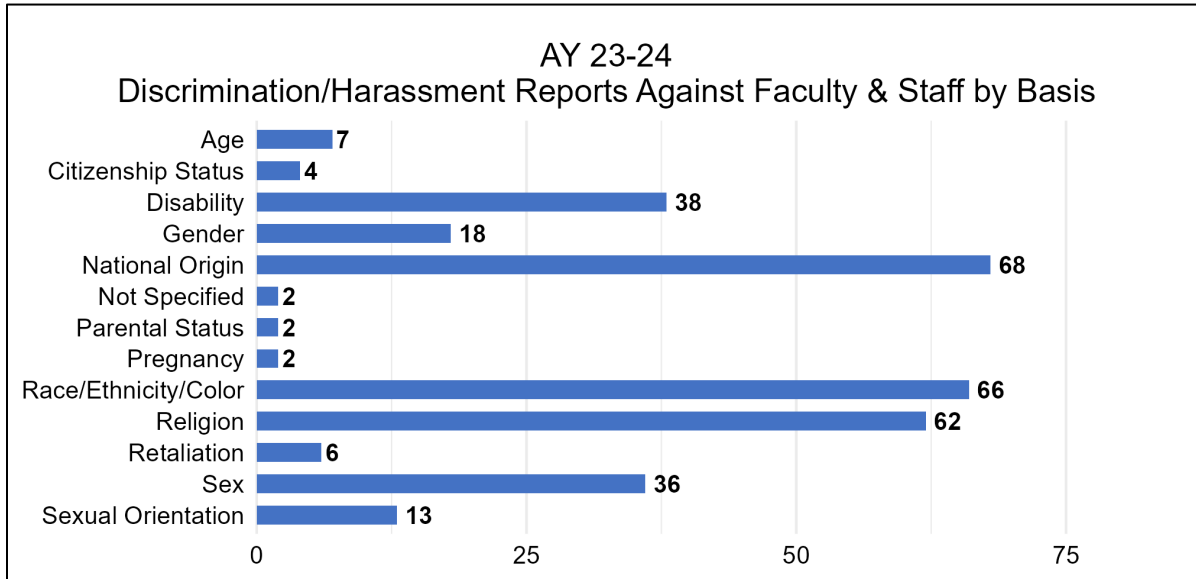
AY 2023-24 Reports Against Faculty & Staff



The following chart presents the distribution of the specific categories of sexual misconduct for the 51 complainant reports that list a faculty or staff member as the respondent. Reports can include more than one allegation type and thus the total across allegation types is 54 for AY 2023-24.

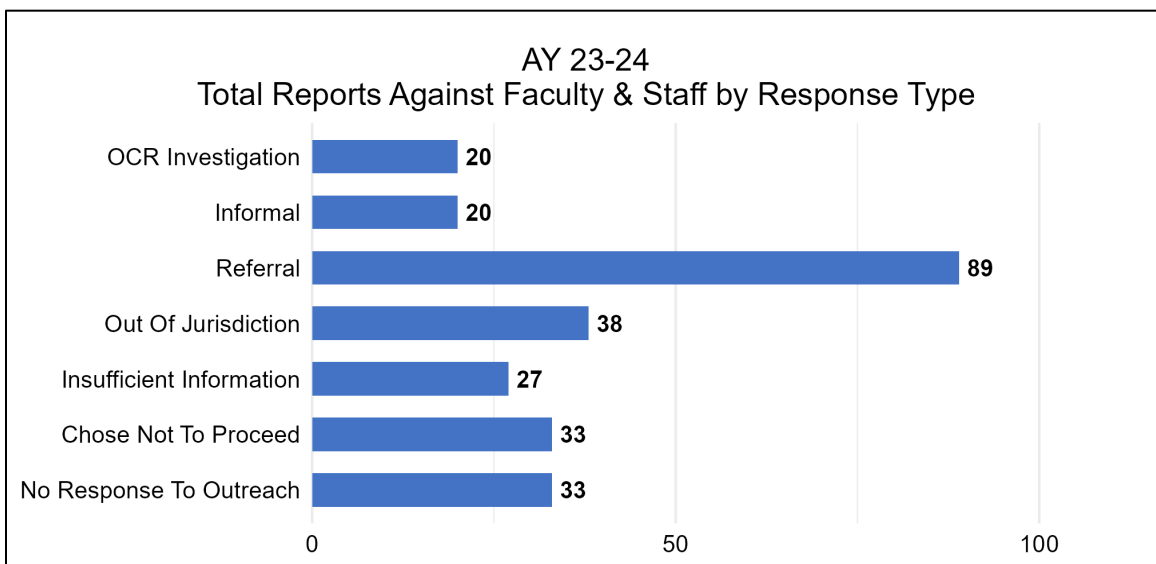


The following chart presents the distribution of the specific bases of discrimination and harassment for the 213 reports of discrimination and harassment that list a faculty or staff member as the respondent. Reports can include more than one basis type and thus the total across basis types is 324 for AY 2023-24.



5. How Complainants Elected to Proceed

NU-OCR's outreach to complainants is the same for matters involving employee respondents. The following chart illustrates how reports of sexual misconduct, discrimination, and harassment against faculty and staff were handled.

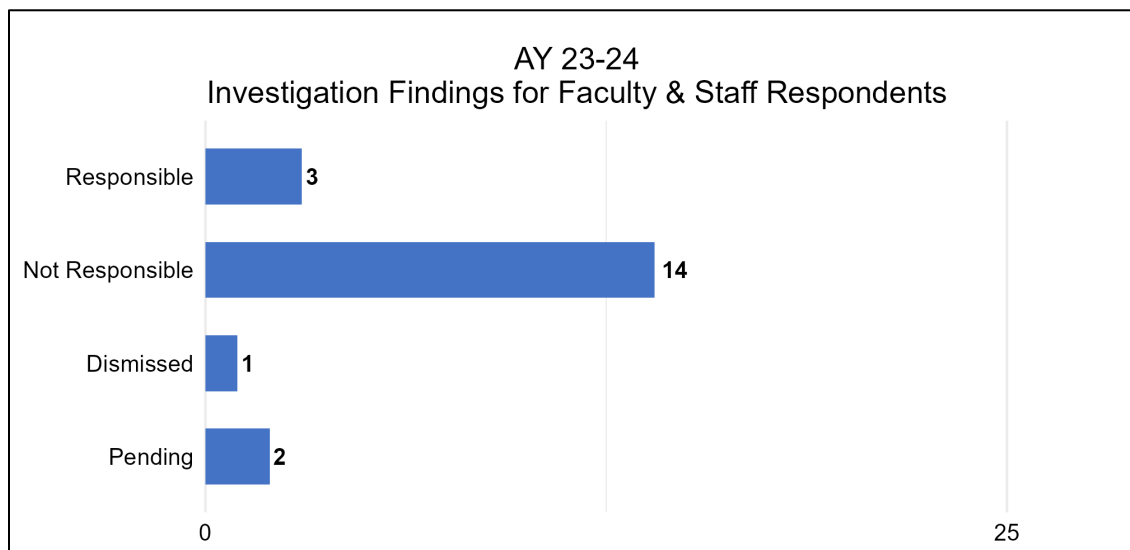


3. Outcomes in Adjudicated Faculty/Staff Cases

In reports with a faculty or staff respondent that proceeded through formal resolution, NU-OCR conducted formal investigations, using staff members (Civil Rights and Title IX Specialists) or

external investigators. In matters where a policy violation was found, the matter was resolved by referring the matter to the appropriate decision maker for discipline.

The following chart illustrates the findings and outcomes for the 20 faculty and staff respondents in cases that proceeded through the formal resolution process during the 2023-2024 academic year.

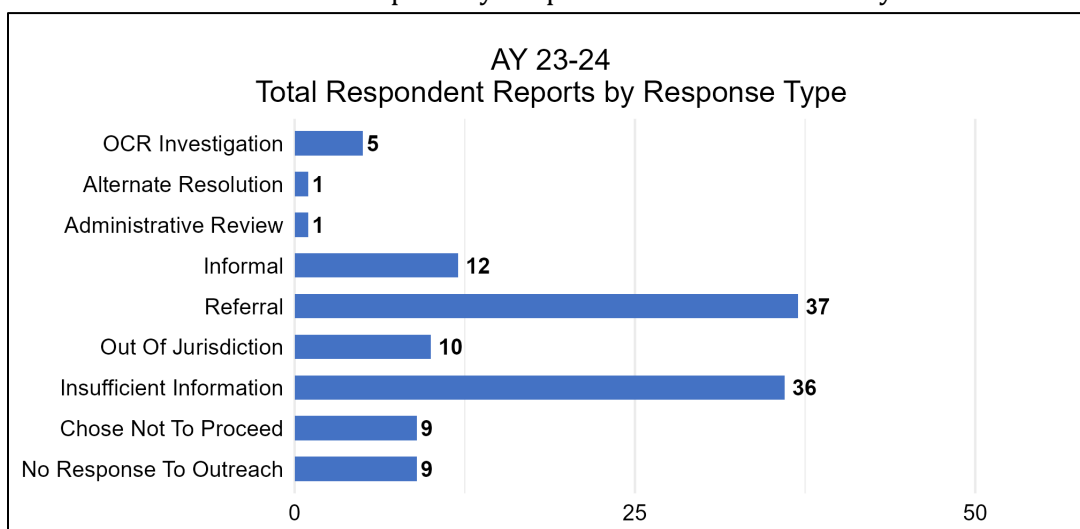


In matters where a policy violation is found, the applicable academic department or administrative unit imposes disciplinary consequences. For staff respondents, NU-OCR provides findings of a policy violation to the Office of Human Resources and the respondent's supervisor(s), who are responsible for deciding what sanctions or corrective actions should be imposed on the respondent, in accordance with the procedures set forth in the Staff Handbook. For faculty respondents, NU-OCR makes a recommendation regarding whether the policy violation warrants considering termination or suspension. The report and the recommendation are sent by NU-OCR to the faculty member's department chair and/or dean, and the Associate Provost for Faculty. Sanctions or corrective actions are determined in accordance with the procedures set forth in the Faculty Handbook.

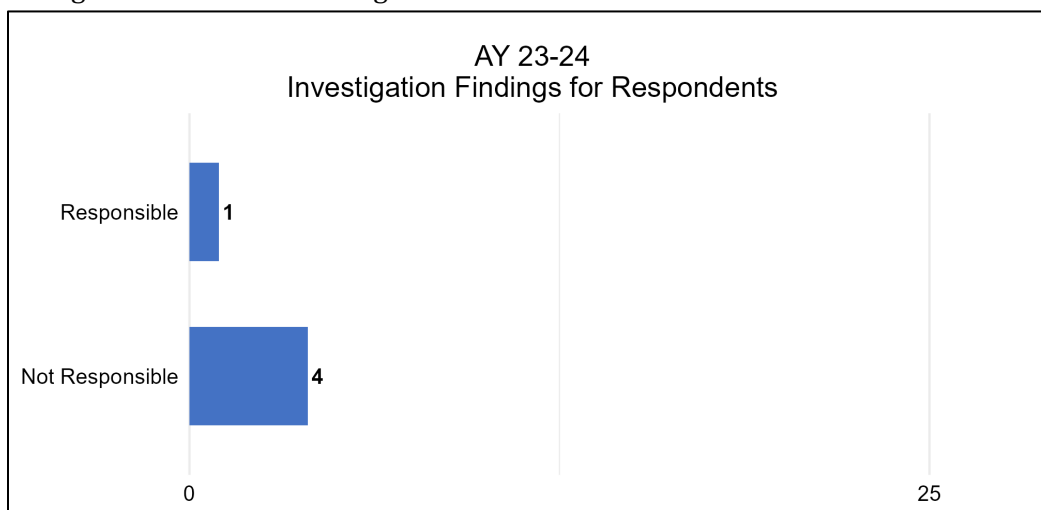
C. Federal Agreement Requirement regarding Antisemitism

On November 28, 2025, Northwestern University entered into an agreement with the federal government to restore frozen federal funding and resolve investigations by the U.S. Departments of Justice, Education, and Health and Human Services. Consistent with the terms of the Agreement, NU-OCR must "include in its annual report comprehensive data on complaints alleging antisemitism, including investigative and disciplinary actions taken." NU-OCR tags reports involving allegations of national origin or religion with "Shared Jewish Ancestry" when the reported conduct involves allegations of antisemitism or discrimination or harassment based on shared Jewish Ancestry. During the 2023-2024 academic year, 122 reports were tagged with Shared Jewish Ancestry.

Consistent with the explanation provided on page 13 regarding how Complainants elect to proceed, the below chart reflects how those reports by Respondent were addressed by NU-OCR.



NU-OCR initiated five formal investigations, resulting in one finding of responsibility. The Respondent in the matter that resulted in a policy violation was terminated prior to the conclusion of the investigation and remains ineligible to be rehired.



IV. Reasonable accommodations for employees with disabilities and pregnant employees

NU-OCR works with faculty, staff, and job applicants with disabilities to provide reasonable accommodations. NU-OCR also provides religious accommodations for faculty and staff as well as pregnancy accommodations for faculty, staff, and students. Information and FAQs regarding the reasonable accommodation process administered by NU-OCR are available at: <https://www.northwestern.edu/accessibility/accommodations>, NU-OCR also reviews accessibility

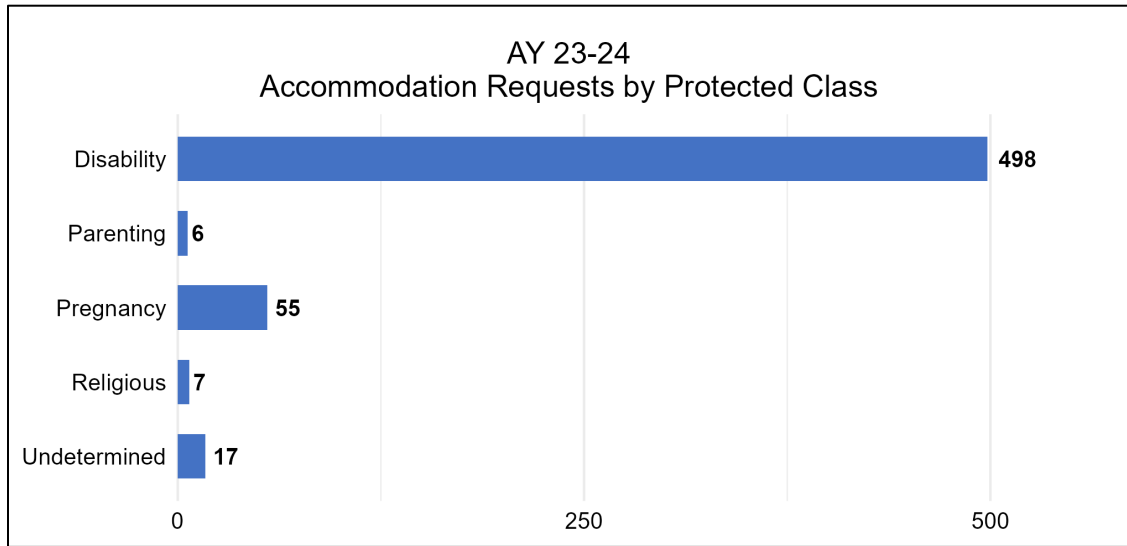
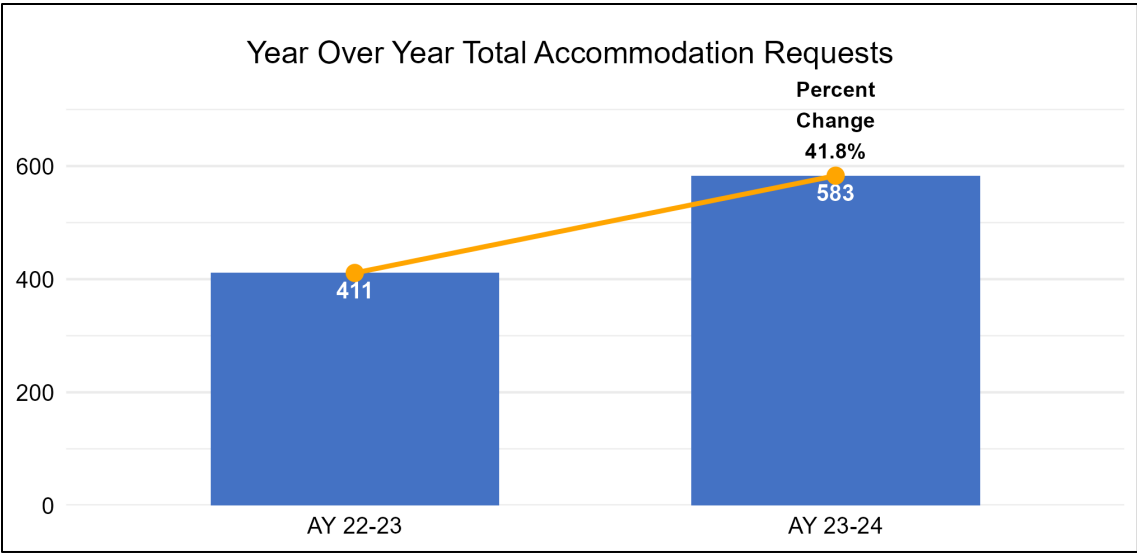
issues reported by the Northwestern community and visitors. The University supports students with disabilities through AccessibleNU, which is part of the Division of Student Affairs.

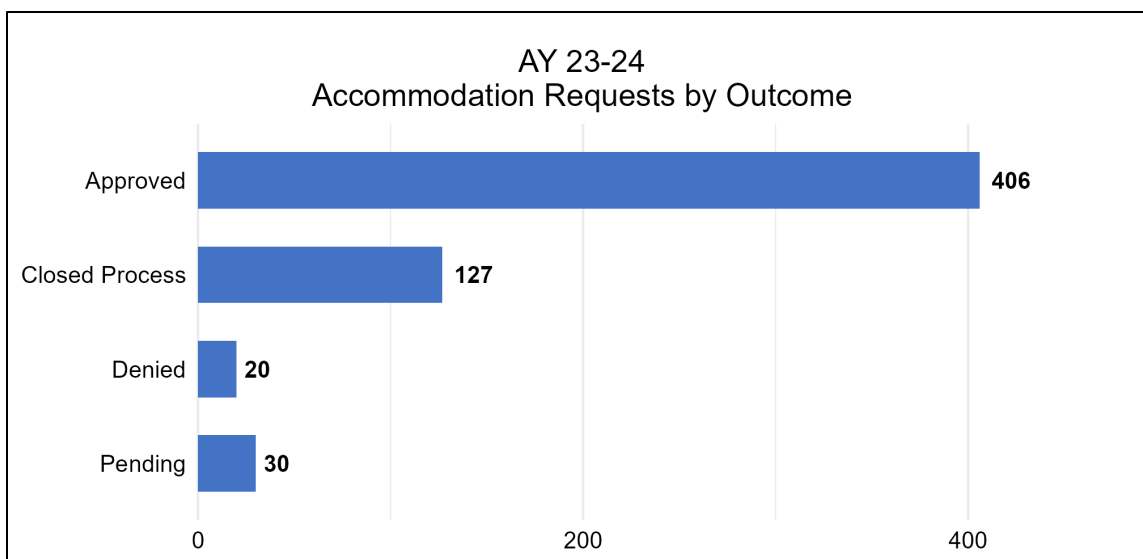
During the 2023-24 academic year, as part of an ongoing effort to ensure a physically accessible campus, NU-OCR worked with key campus partners to engage an external vendor to conduct a systemic campus-wide physical accessibility audit. NU-OCR continued to partner with Environmental Health and Safety (EHS) on the inclusion of specific Americans With Disabilities Act (ADA) requirements in EHS' building inspection checklist, to facilitate corrections of common physical access issues in a timely manner (e.g. malfunctioning power openers). NU-OCR also continued to actively work with campus partners to address concerns and accommodation requests related to specific buildings, and to consult with them on physical accessibility considerations for event planning (including major events such as Graduation Weekend and Dillo Day). For instance, NU-OCR partnered with campus theaters such as Pick-Staigler Concert Hall, Cahn Auditorium, and The Block Museum in regards to inquiries about accessible seating, restroom access, ticketing, accessible entrances, and parking.

NU-OCR also took steps to ensure accessibility in Northwestern's digital landscape. NU-OCR continued its work on the Digital Accessibility Steering Committee (DASC) to obtain, develop, and promote a series of resources for the Northwestern community. Those resources include the purchase of SensusAccess, a software that makes it easy for University community members to convert electronic documents to accessible formats; support for purchase of additional software to ease remediation of electronic documents; review of accessibility plans for new software purchases by departments and units across the University; continued support of the Digital Accessibility Liaison program, to increase in-house knowledge of and implementation of digital accessibility requirements; and enhancements to the University's Accessibility website, which provides a central location where community members and visitors can find resources and report accessibility issues. The Accessibility website is regularly updated with new resources.

A. Overview of Accommodation Requests

During the 2023-2024 academic year, NU-OCR received 583 requests for accommodations. This number includes new accommodation requests, alternative accommodations, extension requests, and adjustments to existing accommodations. When NU-OCR receives a request for a workplace accommodation, NU-OCR staff engage in an interactive process with the requestor of the accommodation. That interactive process involves consultation with the requestor, the requestor's health care providers, and relevant University departments (such as Parking, Facilities, etc.). NU-OCR seeks to implement the requestor's preferred accommodations when possible. If the preferred accommodation is not an option, NU-OCR engages with all parties to identify effective alternative accommodations. Denial of accommodation requests is a rare occurrence because the interactive process succeeds in identifying reasonable accommodations in most cases. The following charts illustrate the outcomes of these requests and the types of medical conditions accommodated.





The “Closed Process” outcome generally refers to instances in which the requestor: (1) did not respond to OCR outreach; (2) chose not to proceed with the accommodation process; or (3) were referred to other University offices or processes.

Accommodations related to the above conditions vary based on the impact of the condition on the individual who is seeking an accommodation. The accommodations approved in the 2023-2024 academic year included (among many others):

- Ergonomic equipment for individuals with chronic musculoskeletal conditions, including arthritis and rheumatoid conditions
- Provision assistive technology for deaf and hard-of-hearing employees
- Mics, keyboards, and text-to-speech software to facilitate equal employment opportunities for employees with a wide range of physical disability types
- Temporary reserved parking spots due to broken bones and to reduce walking distance for pregnant employees
- Remote work due to underlying medical conditions and treatments that result in immune suppression
- Flexible scheduling to attend medical appointments and treatment programs
- Extensions of leave due to postpartum complications and for employees who are ineligible for continued FML/EST benefits
- Work schedule adjustments to allow employees to observe their religious beliefs

V. Training Initiatives

During the academic year 2023-2024, NU-OCR provided education and training to students, faculty, and staff both in person and through live virtual platforms. Workshops and NU-OCR Introduction visits were created in response to campus feedback calling for education on NU-OCR processes,

agency for impacted parties, and responsible employee reporting obligations. Many trainings were provided in partnership with other units and student groups including the Center for Awareness, Response, and Education (CARE),⁶ the University Compliance Office, the Office of Community Standards, and Athletics.

A total of 2,223 students, including undergraduate, graduate, and professional students, completed online, asynchronous sexual misconduct prevention training. 116 student athletes completed the Sexual Violence Prevention for Athletes module which put sexual misconduct and reporting options into context applicable to the student athlete experience. Additionally, NU-OCR provided online, asynchronous sexual misconduct, harassment and discrimination prevention training to 1,103 members of the faculty and staff community.

⁶ The Center for Awareness, Response, and Education (CARE) was renamed the Center for Student Advocacy and Wellness during the 2025-2026 academic year.