

Annual Report September 1, 2022-August 31, 2023

I. Introduction

Northwestern is committed to fostering an environment in which all members of our community are free from discrimination and harassment—including sexual misconduct. Such conduct violates the values of our institution and disrupts the living, learning, and working environment for students, faculty, staff, and other community members.

The [Office of Civil Rights and Title IX Compliance](#) works to uphold the University's commitment by:

- Responding to reports of sexual misconduct, discrimination, and harassment, including by helping students, faculty, and staff understand the University's processes for making such reports, and conducting formal and alternative resolution processes;
- Providing supportive measures, resources, and resolution options to those impacted by sexual misconduct, discrimination, and harassment;
- Providing training, consultation, and resources to the University community regarding accommodating individuals with disabilities, the University's affirmative action programs for faculty and staff, and responding to reports of sexual misconduct, discrimination, and harassment; and
- Working with students, faculty, and staff to revise and implement policies related to sexual misconduct, discrimination, harassment, and providing reasonable accommodations to individuals with disabilities.

The Office of Civil Rights and Title IX Compliance's work primarily falls within four categories: report response, reasonable accommodations for employees with disabilities and pregnancy related accommodations for students and employees, affirmative action planning, and training initiatives. In addition, representatives of the office provide proactive, advisory services to community members who wish to better understand the University's non-discrimination policies or explore ways in which to support equal opportunity in their schools or units.

During the 2022-2023 academic year, the Office of Civil Rights and Title IX Compliance oversaw the implementation of the University's Interim Policy on Title IX Sexual Harassment and the Policy on Institutional Equity. The [Interim Policy on Title IX Sexual Harassment](#) prohibits quid pro quo harassment by an employee; severe, pervasive, and objectively offensive unwelcome conduct of a sexual nature; and Sexual Assault, Dating Violence, Domestic Violence, or Stalking as defined under the Clery Act and the Violence Against Women Act (VAWA). The University's [Policy on Institutional Equity](#) prohibits discrimination and harassment on the basis of race, color, religion, national origin,

sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, reproductive health decision making, or any other classification protected by law in matters of admissions, employment, housing, or in the educational programs or activities it operates. 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 Response

The Office of Civil Rights and Title IX Compliance is responsible for responding to all reports of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment. The Office of Civil Rights and Title IX Compliance is also responsible for responding to reports of discrimination and harassment based on race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, or reproductive health decision making.

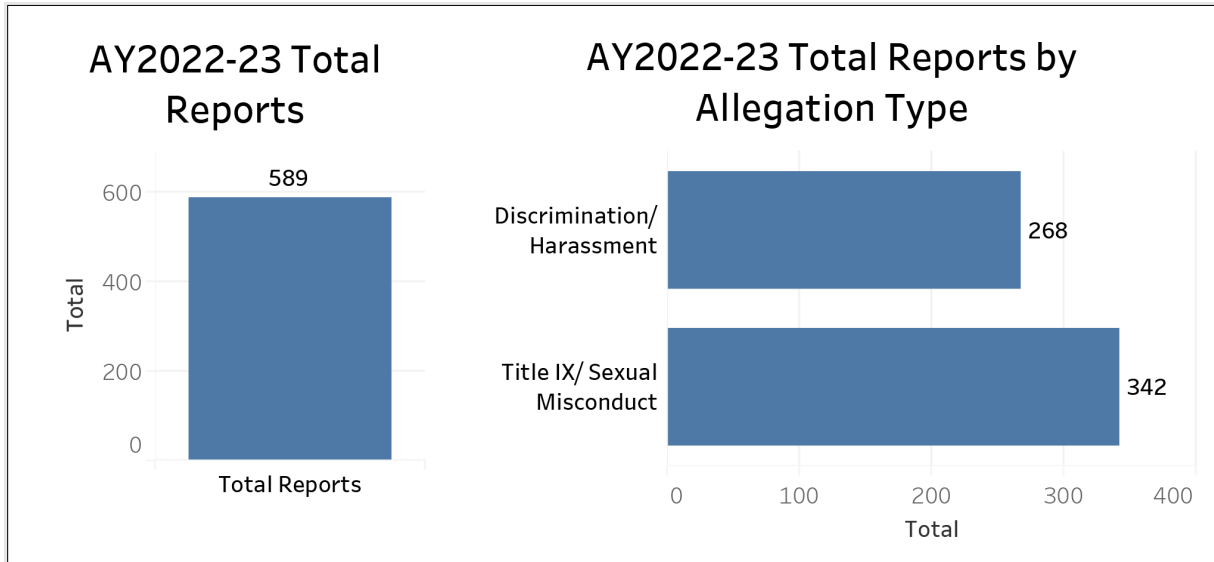
When an incident of alleged sexual misconduct, discrimination or harassment is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, the Office of Civil Rights and Title IX Compliance sends an outreach email to the potentially impacted person(s) to offer information and resources. One of the options that may be available to a person who may have experienced such is a University adjudication of whether a violation of the Interim Policy on Title IX Sexual Harassment or Policy on Institutional Equity 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 III of the applicable policy.

The following charts present data on the number of sexual misconduct, discrimination, and harassment reports received by the Office of Civil Rights and Title IX Compliance, the nature of those reports, and their disposition during the academic year beginning September 1, 2022, and ending August 31, 2023.

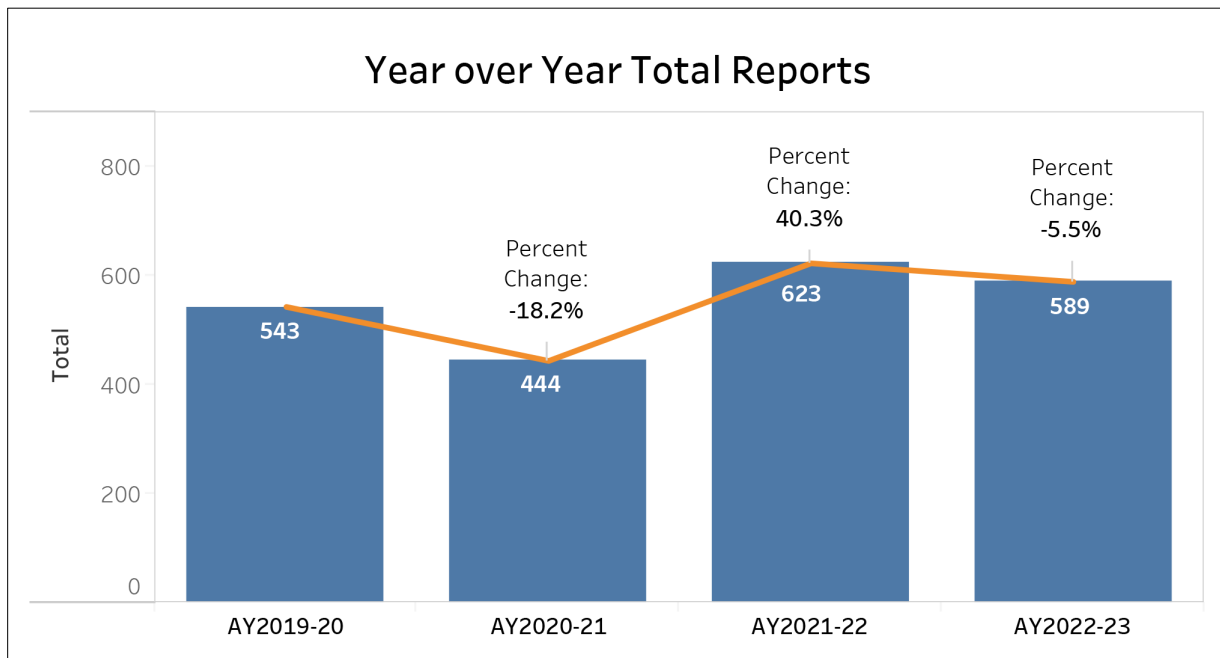
A. Distribution of All Reports by Type of Allegation

During the 2022-2023 academic year, the Office of Civil Rights and Title IX Compliance received 589 reports.¹ The following chart illustrates the distribution by type of allegation of the reports received by the Office of Civil Rights and Title IX Compliance.

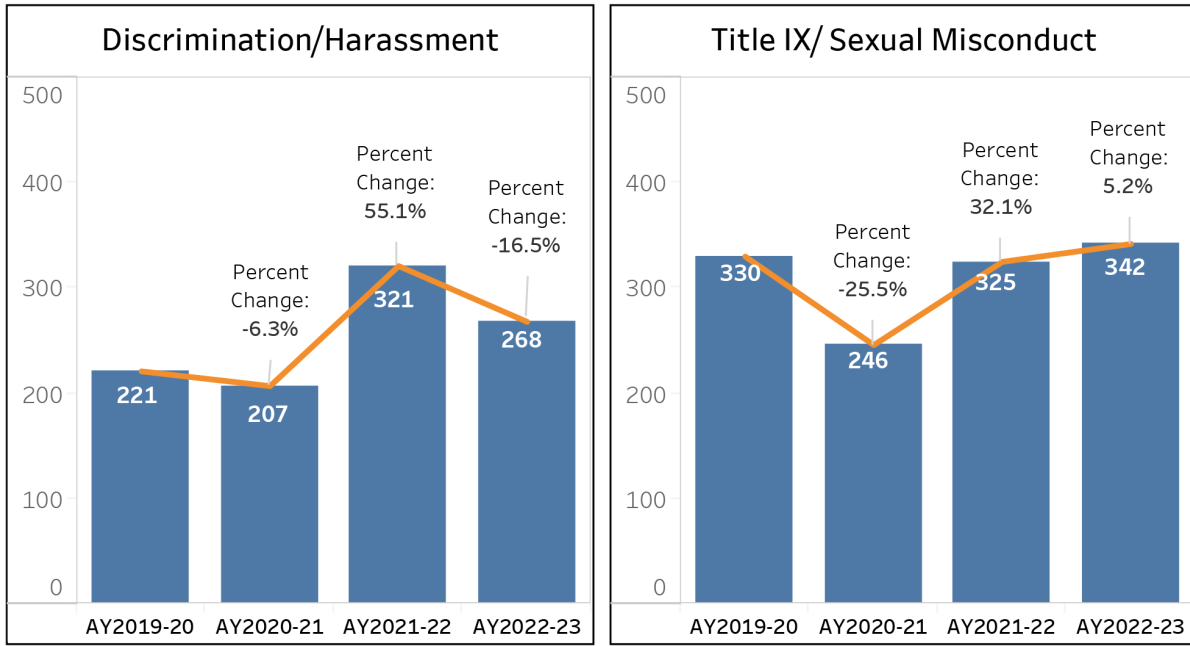
¹ In calculating the number of reports, when the Office of Civil Rights and Title IX Compliance receives multiple reports about the same incident or conduct, that incident or conduct is counted as a single report.



The Office of Civil Rights and Title IX Compliance saw a decrease in reports in the 2022-23 academic year as compared to the previous (2021-22) year. As the following charts represent, the overall number of reports decreased by 34 from 623 in 2021-22, to 589 in 2022-23. The number of discrimination and harassment reports decreased by 53, from 321 in 2021-22, to 268 in 2022-23. However, the number of sexual misconduct reports increased by 17, from 325 in 2021-22 to 342 in 2022-23. Reports can include more than one allegation type (e.g. discrimination and sexual misconduct), and thus the total of reports by allegation type can be greater than the total of reports.

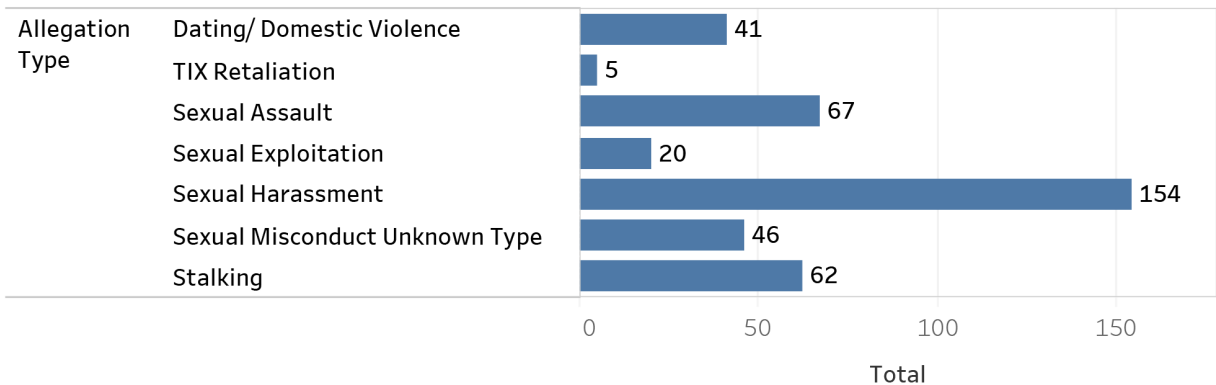


Year over Year Total Reports by Allegation Type

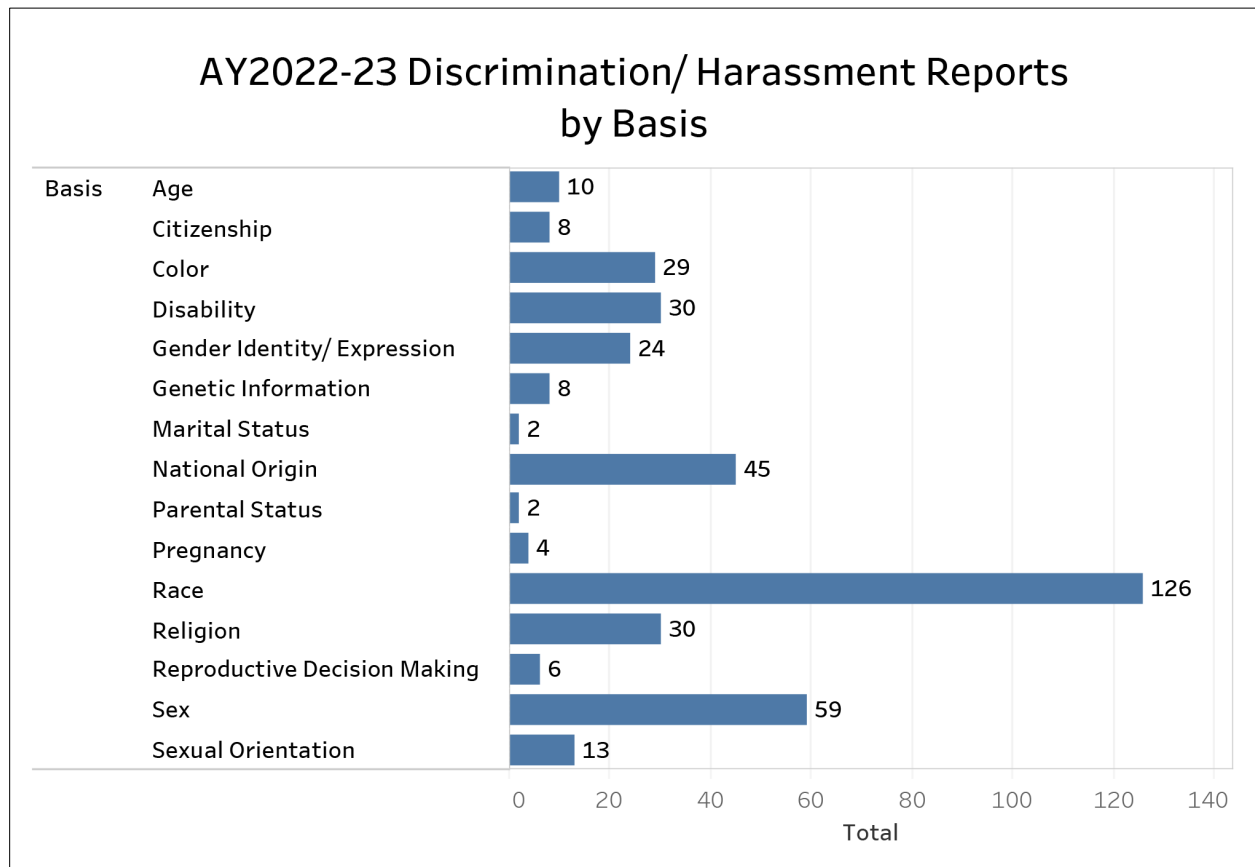


The following chart illustrates the type of sexual misconduct allegations received in 2022-23. Reports can include more than one allegation category type (e.g. sexual assault and sexual harassment), and thus the total of allegation types can be greater than the total of sexual misconduct reports received. As a result of some reports including more than one allegation type, a total of 395 categorizations are represented below.

AY2022-23 Sexual Misconduct Reports by Allegation Type



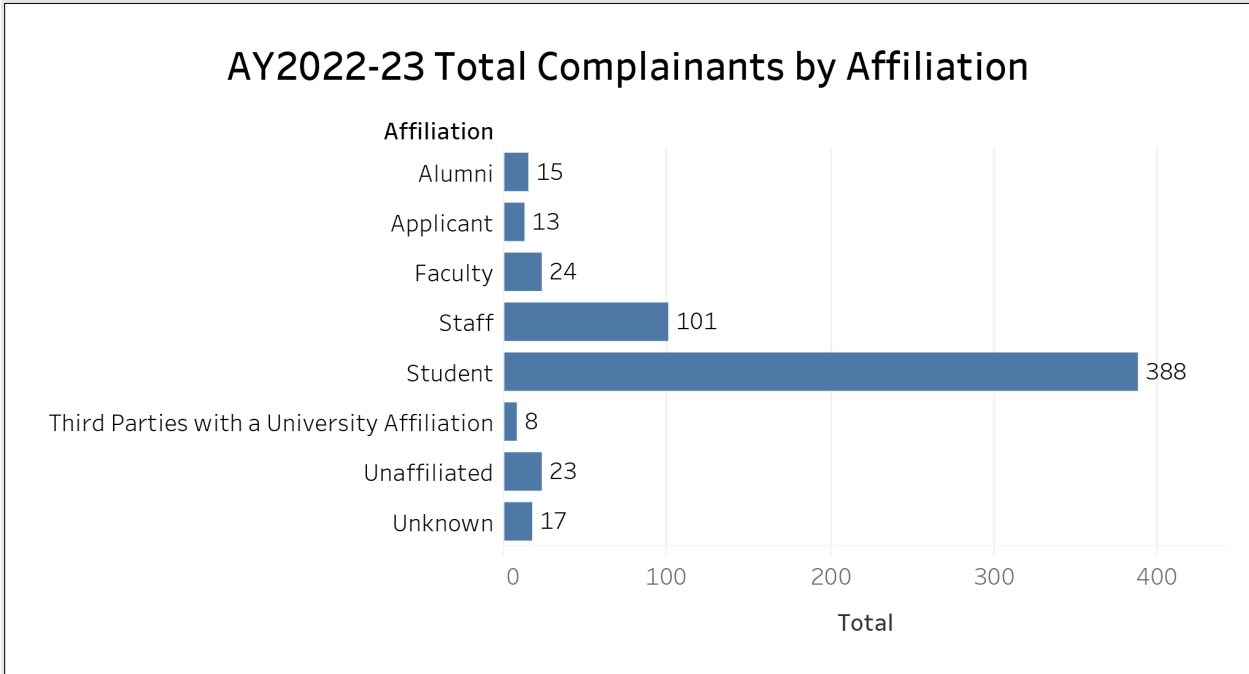
The following chart illustrates the basis categories included in the 268 reports of discrimination and harassment. Note that each report could articulate one or more bases. As a result of some reports being counted on multiple bases, a total of 396 categorizations are represented below.



B. Distribution of Reports by Complainant Affiliation

The following chart illustrates the complainant affiliation for each of the reports received by the Office of Civil Rights and Title IX Compliance during the 2022-2023 academic year. The complainant is the person who is alleged to have been impacted by the reported conduct. Reports received can include multiple complainants and thus the total of complainants can vary from the total of reports received. Of the 589 complainants, 40 (6.8%) either held no affiliation with Northwestern, or remained unidentified.²

² When Northwestern receives reports from individuals who are unknown or unaffiliated, the Office of Civil Rights and Title IX Compliance 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.

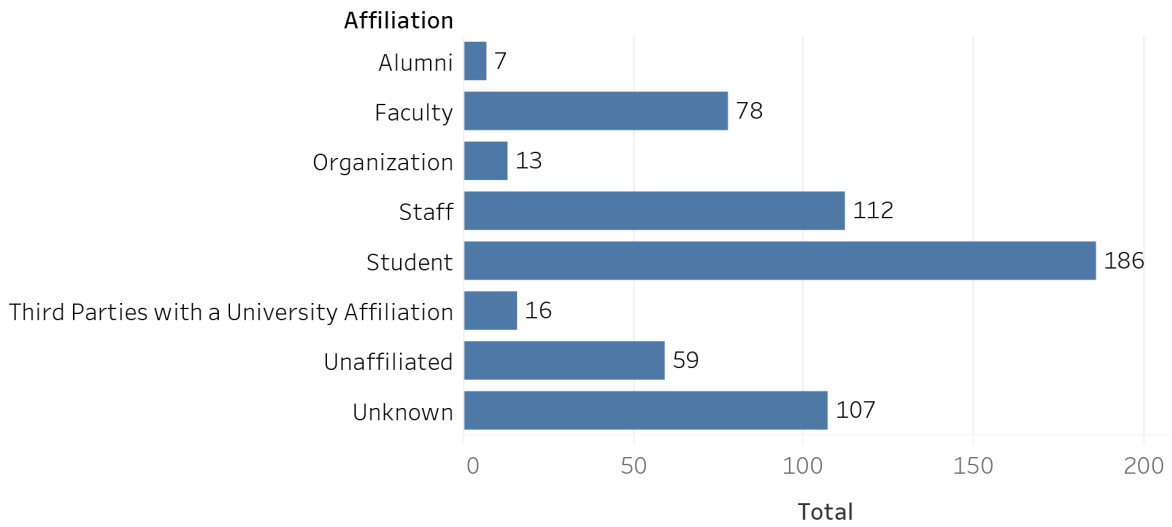


C. Distribution of Reports by Respondent Affiliation

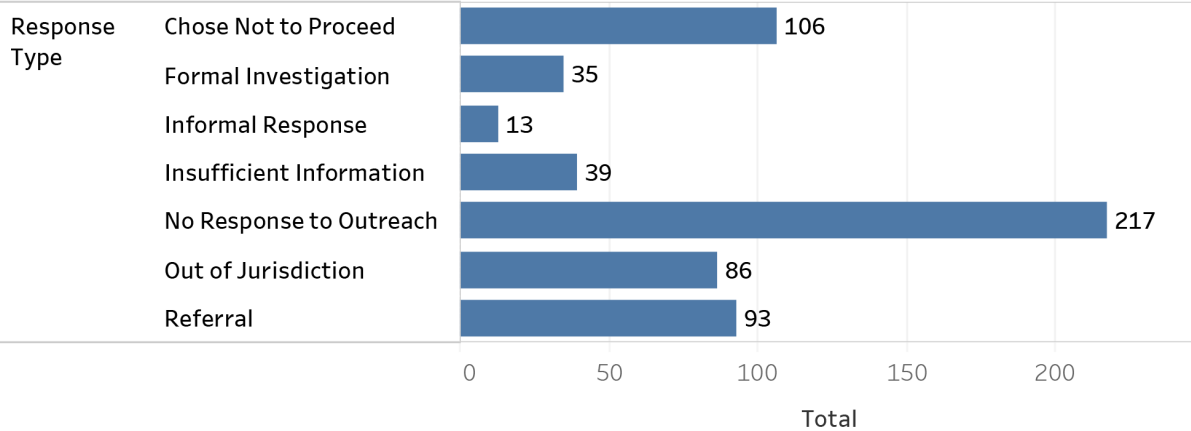
The following chart illustrates the respondent affiliation for each of the reports received by the Office of Civil Rights and Title IX Compliance during the 2022-23 academic year. The respondent is the person who is alleged to have engaged in discrimination, harassment, or sexual misconduct. Reports received can involve multiple respondents, and at the same time separate reports can be related to one respondent, thus the total of respondents can be different from the total of reports received. Of the 578 respondents, 166 (28.7%) 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.³

³ 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.

AY2022-23 Total Respondents by Affiliation

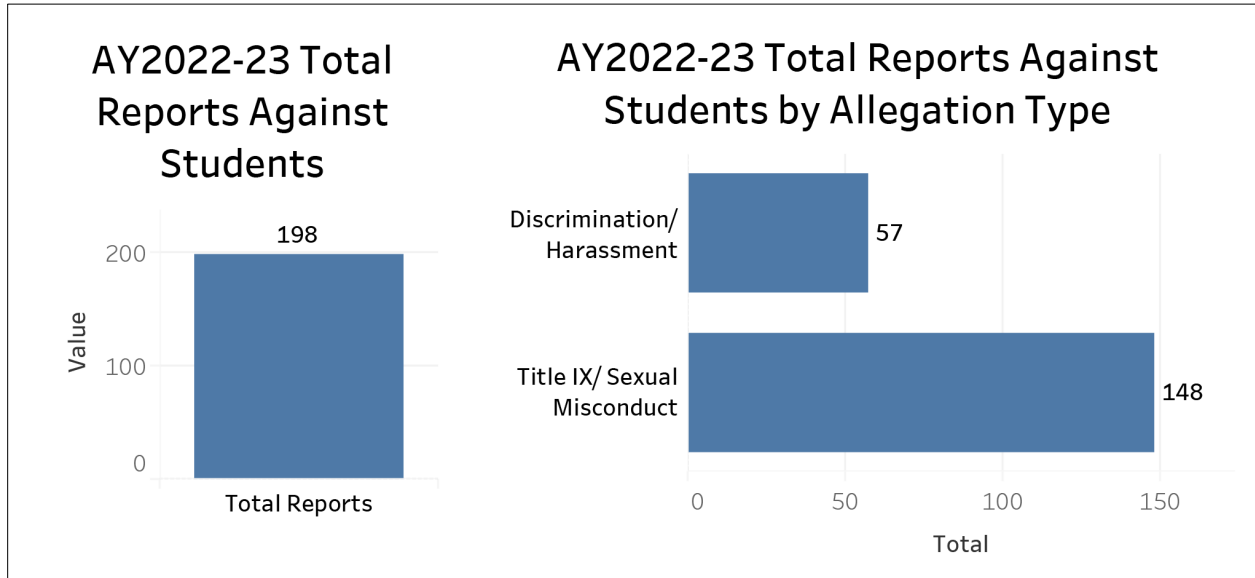


AY2022-23 Total Reports by Response Type

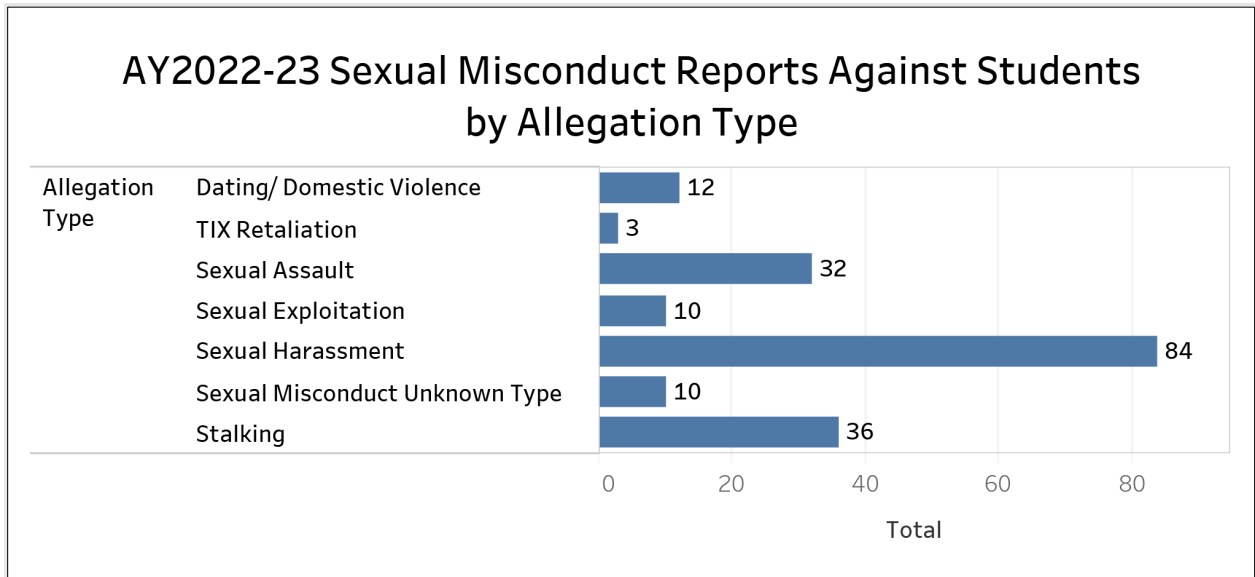


D. Reports Against Students

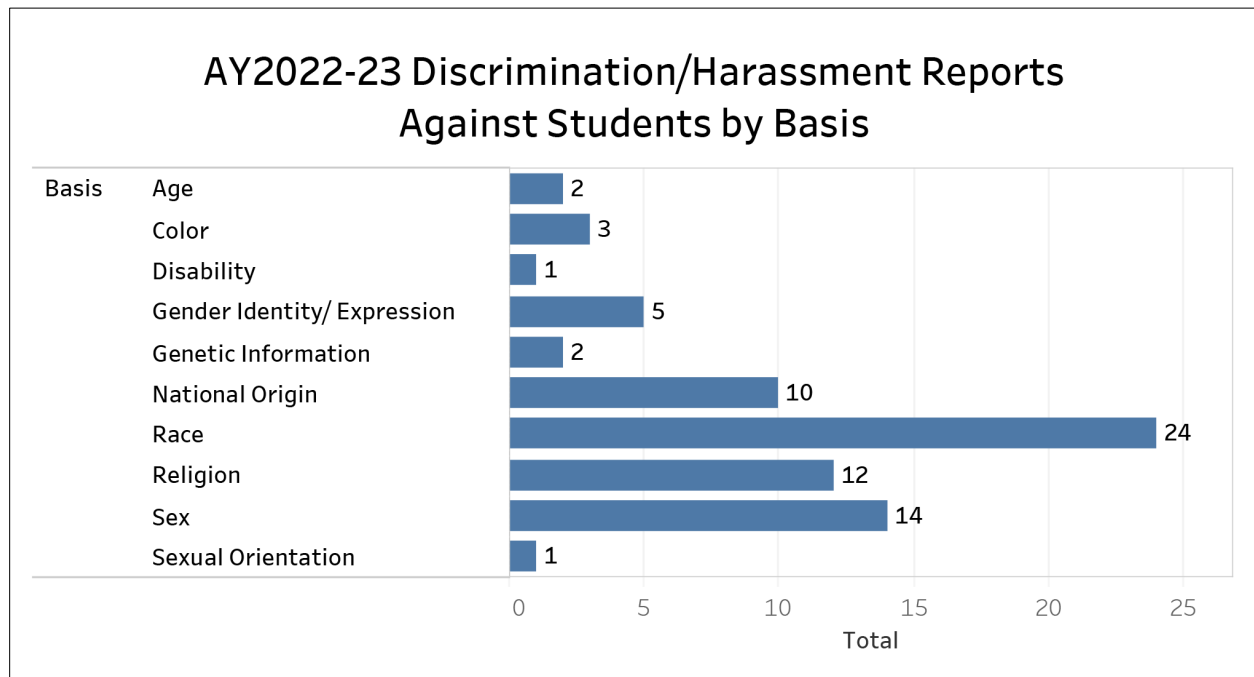
1. Distribution of Reports Involving Student Respondents by Category of Violation Alleged



Between September 1, 2022, and August 31, 2023, the Office of Civil Rights and Title IX Compliance received 198 reports alleging that Northwestern students engaged in sexual misconduct. The below table contains the total of allegation types included in the reports. Reports can include more than one allegation type and thus the totals by allegation type can be greater than the total of reports received. As a result of reports including multiple allegation types, 187 categorizations are represented below.



The following chart illustrates the basis categories included in the 57 reports of discrimination and harassment. Note that each report could articulate one or more bases. As a result of some reports being counted on multiple bases, a total of 74 categorizations are represented below.

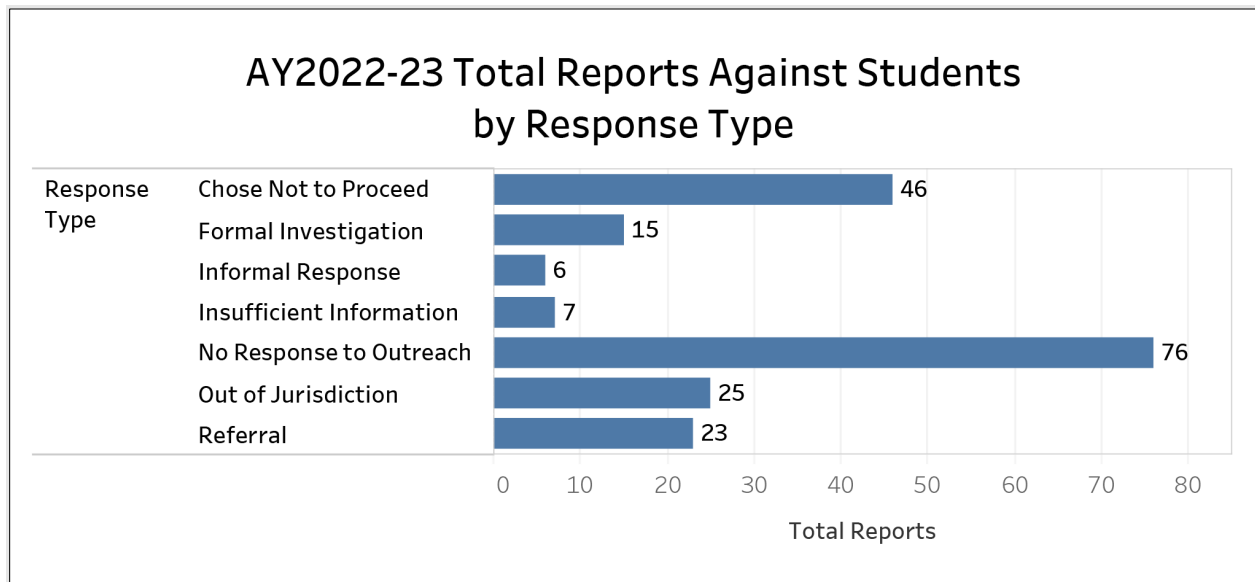


2. How Complainants Elected to Proceed

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, the Office of Civil Rights and Title IX Compliance reaches out to the individual(s) who may have experienced misconduct to make them aware of resolution options and resources available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Civil Rights and Title IX Compliance will attempt to honor that request but, in some cases, the Office of Civil Rights and Title IX Compliance may determine that it needs to proceed with an investigation. In making this decision, the Office of Civil Rights and Title IX Compliance weighs factors outlined in the policies. In such cases where the Office of Civil Rights and Title IX Compliance initiates an investigation, the Office of Civil Rights and Title IX Compliance will not compel an individual to participate. Individuals impacted by discrimination, harassment, or sexual misconduct may request supportive measures from the Office of Civil Rights and Title IX Compliance even if they do not choose to participate in the University's Complaint Resolution Process.

The following chart illustrates how the 198 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 formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of sexual misconduct and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have

included no-contact directives or educational or advisory meetings with respondents. In addition, the Office of Civil Rights and Title IX Compliance may refer a report to another unit or department for action where appropriate.

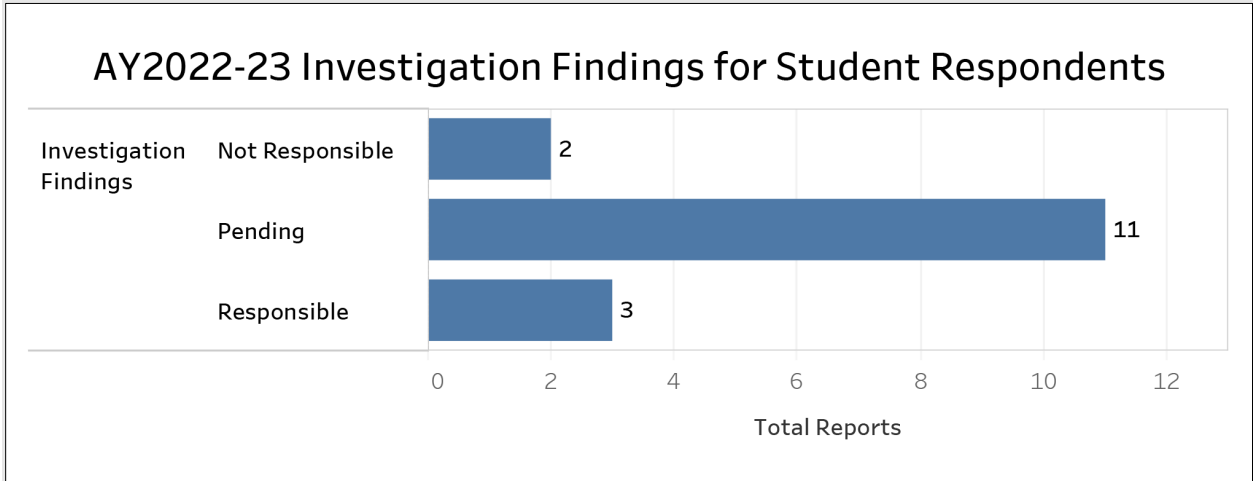


3. Outcomes in Adjudicated Student Cases

In student matters that proceeded through formal resolution, the Office of Civil Rights and Title IX Compliance conducted formal investigations, using staff members (Civil Rights and Title IX Compliance 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 16 student respondents in cases that proceeded through the formal resolution process during the 2022-23 academic year.⁴

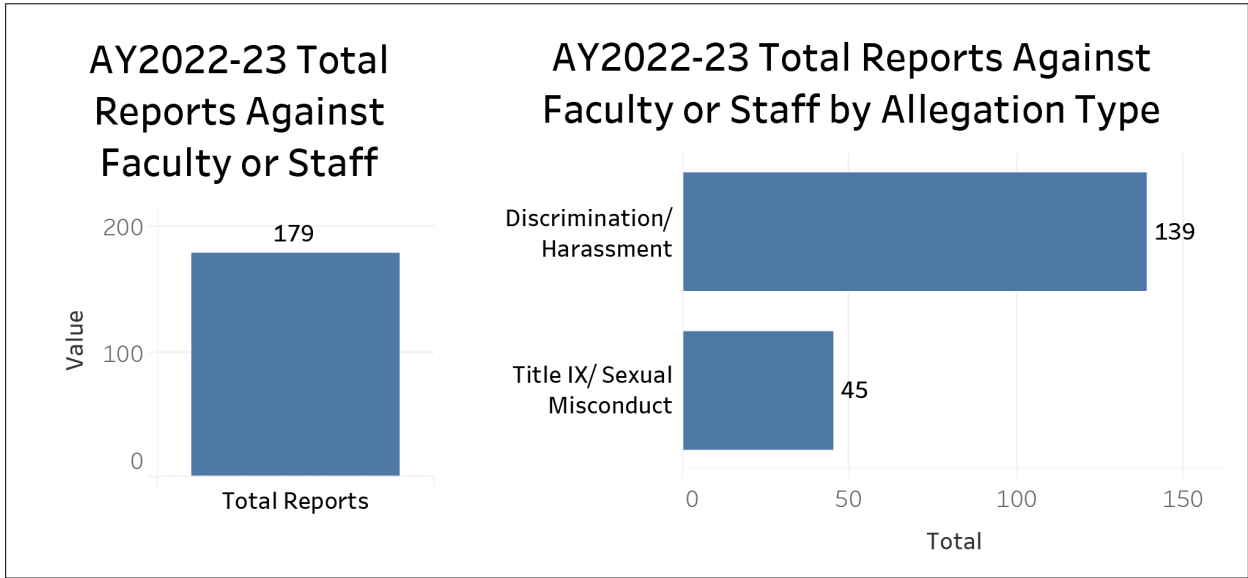
⁴ In cases where a student was alleged to have violated multiple categories of the policies, or to have acted against multiple complainants, the outcome is listed as “Not Responsible” only when the student was found Not Responsible for *all* sexual misconduct allegations against *all* complainants.



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E. Reports Against Faculty and Staff

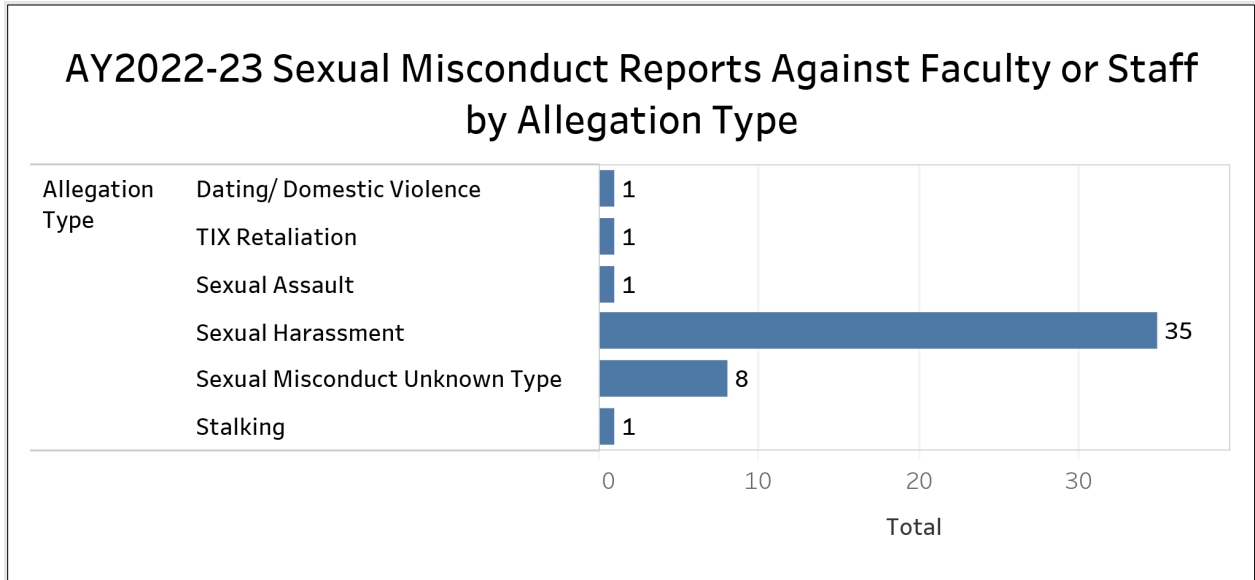
1. Distribution of Reports Involving Faculty and Staff Respondents by Category of Violation Alleged



During the 2022-23 academic year, the Office of Civil Rights and Title IX Compliance received 179 reports involving faculty or staff respondents. The reports included 45 allegations of sexual misconduct and 139 allegations of discrimination and harassment. Reports can include more than

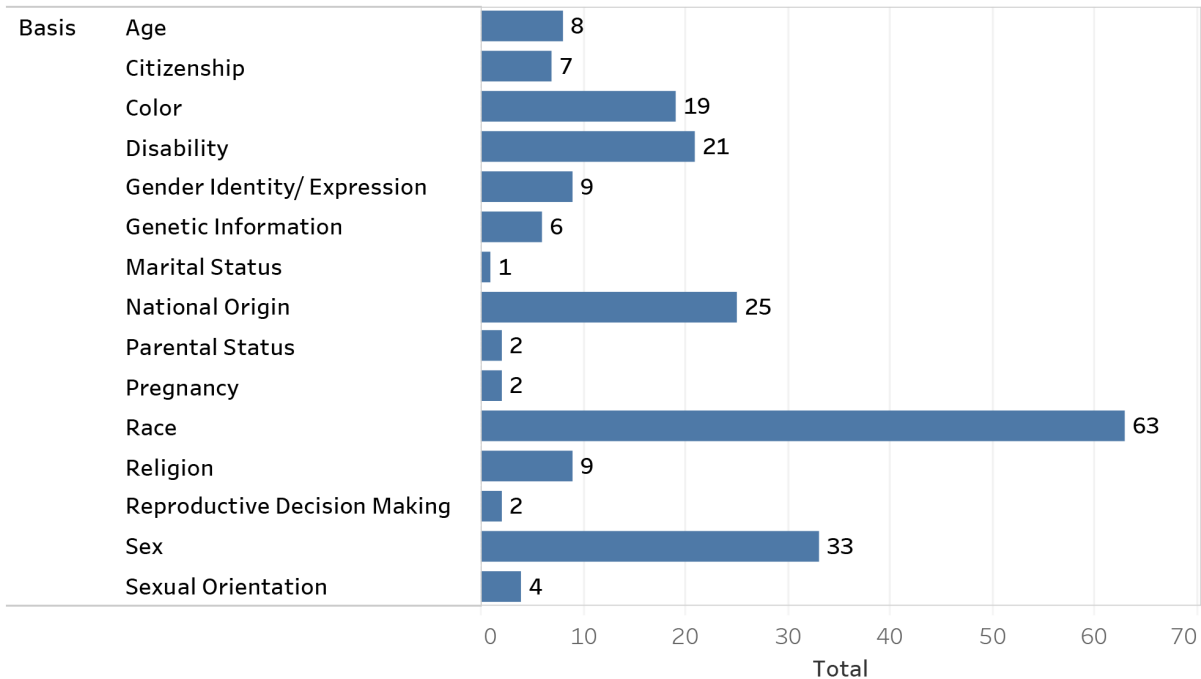
⁵ During the 2022-2023 academic year, the Office of Civil Rights and Title IX Compliance experienced significant staffing changes. The University engaged an external interim Title IX Coordinator as well as external investigators to conduct the resolution processes. Some formal investigations remained pending at the conclusion of the 2022-23 academic year.

one allegation type and thus the total of allegation types can be greater than the total of reports received.



The following chart illustrates the basis categories included in the 139 reports of discrimination and harassment. Note that each report could articulate one or more bases. As a result of some reports being counted on multiple bases, a total of 211 categorizations are represented below.

AY2022-23 Discrimination/Harassment Reports Against Faculty or Staff by Basis

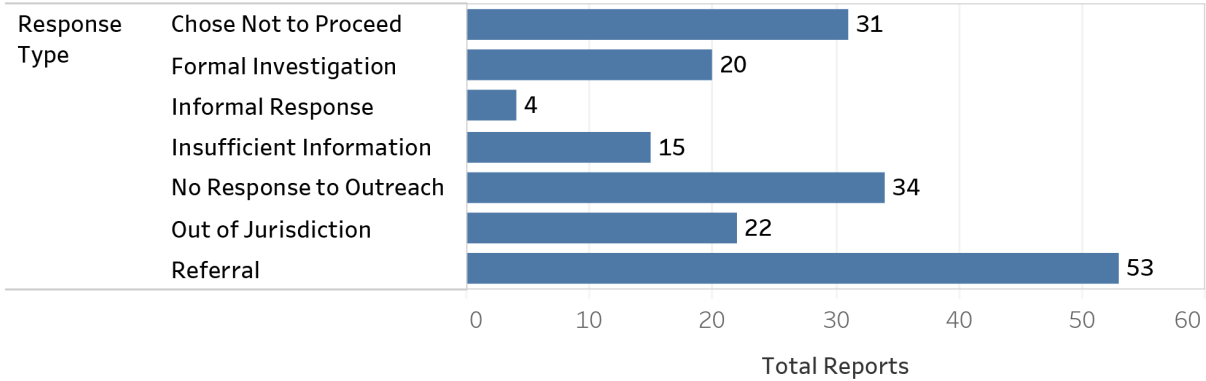


2. How Complainants Elected to Proceed

As described above, when the Office of Civil Rights and Title IX Compliance receives a report from any source, including directly from impacted individuals and indirectly through others, the Office of Civil Rights and Title IX Compliance reaches out to the individual(s) who may have experienced misconduct to make them aware of their options and the resources that are available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Civil Rights and Title IX Compliance will attempt to honor that request but, in some cases, the Office of Civil Rights and Title IX Compliance may determine that it needs to proceed with an investigation. In such cases, the Office of Civil Rights and Title IX Compliance will not compel an individual to participate.

The following chart illustrates how reports of sexual misconduct, discrimination, and harassment against faculty and staff were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a faculty or staff member, and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved an investigation. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of discrimination, harassment, or sexual misconduct and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included educational or advisory meetings with respondents, or educational programming for departments or units. In addition, the Office of Civil Rights and Title IX Compliance may refer a report to another unit or department for action where appropriate.

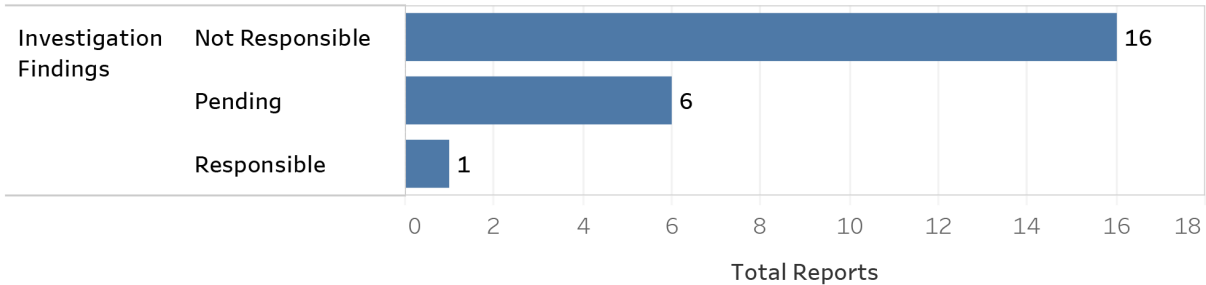
AY2022-23 Total Reports Against Faculty or Staff by Response Type



3. Outcomes in Adjudicated Faculty/Staff Cases

The following charts illustrate the findings and outcomes for the 23 reports faculty and staff respondents in cases that were formally resolved through investigation during the 2022-2023 academic year.

AY2022-23 Investigation Findings for Faculty or Staff Respondents



In matters where a policy violation is found, disciplinary consequences are imposed by the applicable academic department or administrative unit. For staff respondents, the Office of Civil Rights and Title IX Compliance 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, the Office of Civil Rights and Title IX Compliance makes a recommendation regarding whether the policy violation warrants considering

termination or suspension. The report and the recommendation are sent by the Office of Civil Rights and Title IX Compliance 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.

III. Reasonable accommodations for employees with disabilities and pregnant employees

The Office of Civil Rights and Title IX Compliance works with faculty, staff, and job applicants with disabilities to provide reasonable accommodations. The Office of Civil Rights and Title IX Compliance 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 the Office of Civil Rights and Title IX Compliance are available at: <https://www.northwestern.edu/civil-rights-office/policies-procedures/accommodation/>. The Office of Civil Rights and Title IX Compliance 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 2022-23 academic year, as part of an ongoing effort to ensure a physically accessible campus, the Office of Civil Rights and Title IX Compliance worked with key campus partners to engage an external vendor to conduct a systemic campus-wide physical accessibility audit. The Office continued to partner with Risk Management on the inclusion of specific Americans With Disabilities Act (ADA) requirements in Risk Management's building inspection checklist, to facilitate corrections of common physical access issues in a timely manner (e.g. malfunctioning power openers). The Office also continued to actively work with campus partners to address concerns related to specific buildings, and to consult with them on physical accessibility considerations for event planning (including major events such as Graduation Weekend).

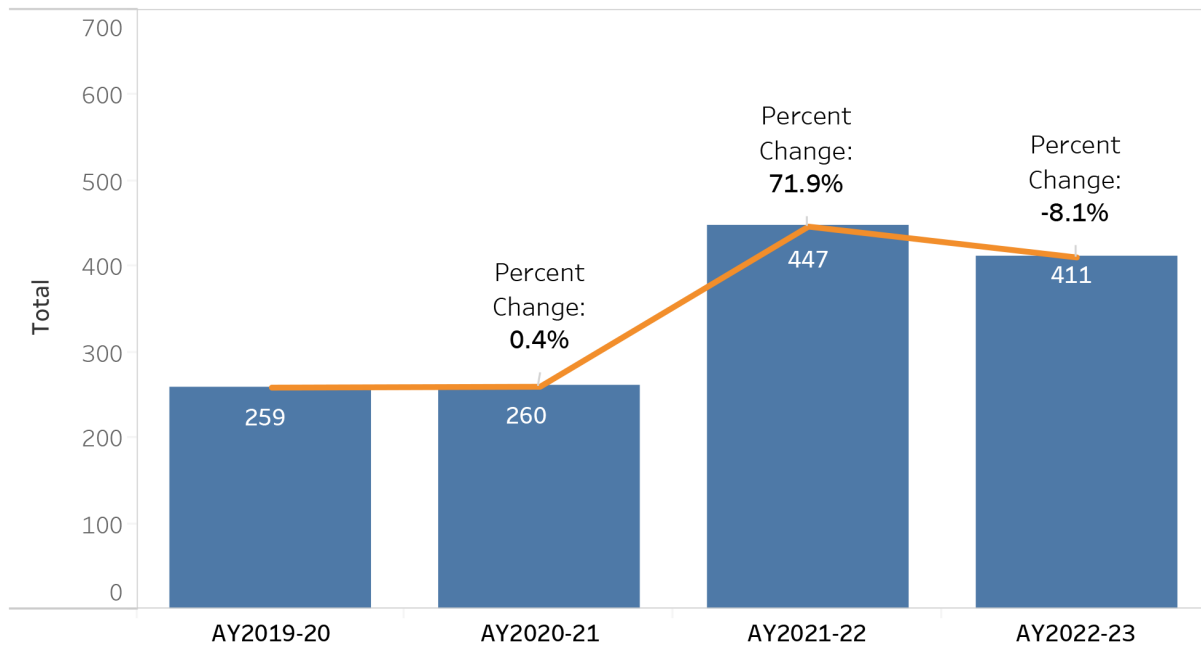
The Office of Civil Rights and Title IX Compliance also took a number of steps to ensure accessibility in Northwestern's digital landscape. The Office of Civil Rights and Title IX Compliance continued its work on the Digital Accessibility Steering Committee (DASC) to obtain, develop, and promote a number 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 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

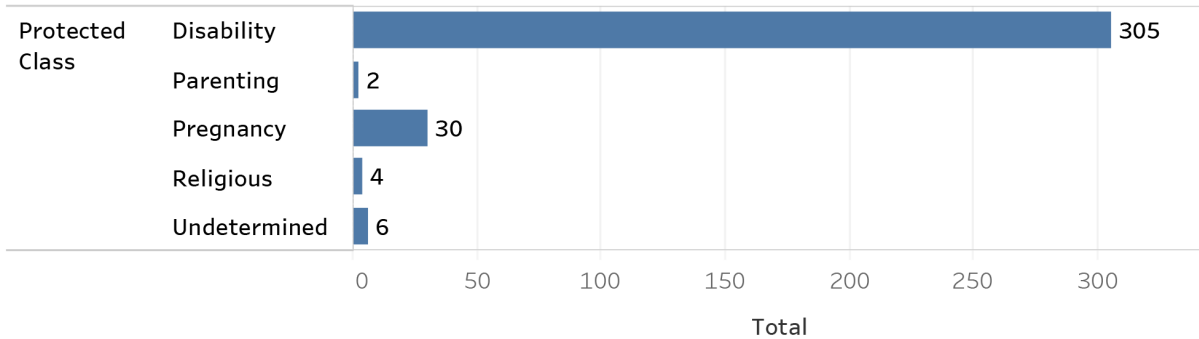
During the 2022-2023 academic year, the Office of Civil Rights and Title IX Compliance received 411 requests for disability accommodations. This number includes new accommodation requests, alternative accommodations, extension requests, and adjustments to existing accommodations. When the Office of Civil Rights and Title IX Compliance receives a request for a workplace

accommodation, the Office engages 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.). The Office of Civil Rights and Title IX Compliance seeks to implement the requestor's preferred accommodations when possible. In some cases when the preferred accommodation may not be an option, the Office of Civil Rights and Title IX Compliance 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.

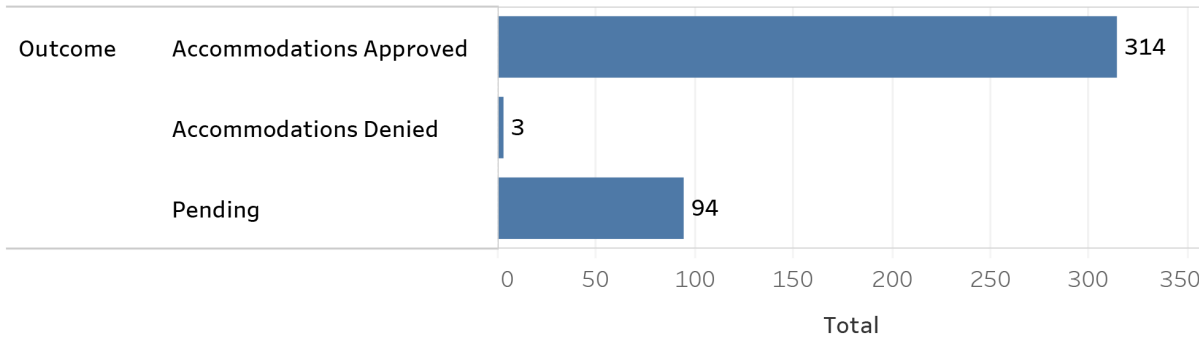
Year over Year Change in Total Accommodation Requests



AY2022-23 Accommodation Requests by Protected Class



AY2022-23 Accommodation Requests by Outcome



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 2022-2023 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; and
- Flexible scheduling to attend medical appointments and treatment programs;
- Extensions of leave due to postpartum complications and for employees ineligible for continued FML/EST benefits;

- Work schedule adjustments to allow employees to observe their religious beliefs.

IV. Affirmative Action Planning

The Office of Civil Rights and Title IX Compliance is responsible for developing the University's annual Affirmative Action Plan for Women, Minorities, Individuals with Disabilities, and Protected Veterans. The affirmative action program is a federal compliance report required of federal contractors and is designed to help the University ensure it has policies and processes in place to ensure equal opportunity in its employment activity. The reporting provides analysis to help identify areas where barriers may exist and assist Northwestern in its continued efforts to develop initiatives that foster a diverse and inclusive community.

On an annual basis, the Office of Civil Rights and Title IX Compliance works with the HR Talent Acquisition office, the HR Support, Process & Analytics office, and the Faculty Operations office to implement and refine processes for the flow of data and information stemming from diversity data requests from across the University. Focus continues to be placed on establishing processes for working with recruiters and search committees for the analysis of data as it relates to AAP requirements for focusing outreach and recruitment efforts. These efforts are essential to the AAP component designed to increase the diversity of applicant pools in areas of underrepresentation at the University.

This past year a major effort was undertaken to further assist the HR Talent Acquisition team in reviewing its progress in outreach and recruitment efforts. The data was broken out by job groupings and presented alongside current job group population percentages as well as market population estimates for comparative values to determine where progress has been made in drawing in diverse pools of applicants and where further efforts can be focused based on market comparisons. This year the HR Talent Acquisition team implemented services from Circa to assist with its compliance efforts in posting positions broadly to increase awareness of job opportunities and to better track the effectiveness of efforts to draw in applicants as part of its compliance obligations. Having better data around the effectiveness of applicant sourcing specific to which sources applicants are being derived from will help to provide focus of recruiting resources towards those organizations and market outlet sources which are producing the strongest results. This is not only focused on women and minority sourcing, but also veterans and individuals with disabilities.

The Office of Civil Rights and Title IX Compliance also worked with HR Talent Acquisition on a review of applicant dispositioning data from the prior annual cycle as part of ongoing efforts to ensure accuracy in dispositioning to differentiate qualified vs unqualified applicants to better understand the effectiveness of outreach efforts and to develop quality data to identify why applicants are being rejected. This work is ongoing and an essential component for future efforts to analyze the effectiveness of efforts to draw in more diversity into applicant pools.

V. Training Initiatives

During the academic year 2022-2023, the Office of Civil Rights and Title IX Compliance provided education and training to students, faculty, and staff both in person and through live virtual platforms. Workshops and OCR Introduction visits were created in response to campus feedback calling for education on 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), the University Compliance Office, the Office of Community Standards, and Athletics.

All 2,184 incoming first year and transfer students completed online, asynchronous sexual misconduct prevention training. All 527 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, the Office of Civil Rights and Title IX Compliance provided online, asynchronous sexual misconduct, harassment and discrimination prevention training to 9,299 members of the faculty and staff community:

- Faculty: 2,595
- Staff: 5,747
- Others: 501