



TO: Tom Courtway

FROM: President  
  
Graham L. Gillis, Ed.D

Associate Vice President for Human Resources and Risk Management/

Interim Title IX Coordinator

RE: Oxford American Title IX Review

Date: August 7, 2012

Attached is the final Title IX Report from the internal Title IX Review conducted by Wendy Holbrook and me. Please let me know if you have any questions.

attachment

## Oxford American Title IX Review

In July 2012, the University of Central Arkansas (UCA) became aware of a potential Title IX situation when it was disclosed in the newspaper of possible sexual harassment violations at Oxford American. Although the Oxford American staff and student interns are not UCA employees, UCA does provide office space for them to work. In this case, there was at least one student intern that is a UCA student.

According to Title IX legislation, "Regardless of whether a harassed student, his or her parent, or a third party files a complaint under the schools' grievance procedures or otherwise requests action on the student's behalf, a school that knows, or reasonably should know, about possible harassment must promptly investigate to determine what occurred and then take appropriate steps to resolve the situation". Since possible Title IX violations may have occurred on UCA property and even though only one of the student interns was a UCA student, UCA determined it had a responsibility to investigate under Title IX.

During the period of July 19, 2012 through August 1, 2012, several interviews were conducted with Oxford American current staff, former staff, and current student interns. Dr. Graham Gillis, Associate Vice President for Human Resources and Risk Management/Interim Title IX Coordinator, and Wendy Holbrook, Associate Dean of Students/Deputy Title IX Coordinator conducted the interviews. Although the recent newspaper articles regarding Oxford American mostly focused on personnel issues, the total focus of this investigation was to determine if a Title IX violation exists and recommend appropriate steps to resolve the situation.

The following groups of people were interviewed: three current staff, three current student interns, and two former staff members. The workplace for these groups consisted of a large open area for the staff and student interns, and a single office shared by three staff members. Due to the open arrangement of this location, there is limited privacy within the office workplace.

During the course of the interviews with all parties, there was strong evidence that indicated very close working and personal relationships between the different groups. There were many examples of inappropriate sexual conversation and language, obscene gestures were witnessed, and potential sexual harassment situations were documented. While most of these inappropriate interactions occurred in social events and attending conferences/retreats outside the workplace, some also occurred at the workplace.

After reviewing all of the information collected from the interviews, we have determined that a potential Title IX hostile environment exists at the Oxford American workplace located on the UCA campus. While none of the current student interns have indicated a specific sexual harassment complaint, future student interns may not feel the same way. The determining factor is not whether the current student interns believe that the current environment is hostile or not, but whether current workplace behaviors may be viewed as potentially hostile based on Title IX guidelines.

Our recommendations depend on the future operation of Oxford American but if it is to continue to have its staff and student interns on our campus, we recommend the following:

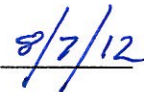
1. Appropriate sexual harassment and Title IX training must be provided to all current and future staff and student interns. Appropriate signed documentation must be stored in the personnel file at Oxford American.
2. The management of Oxford American should communicate to current and future staff and student interns appropriate workplace behavioral guidelines and should also place this documentation in the personnel file.
3. Regular quarterly meetings should be held by the Director of Oxford American with all staff and student interns to review and discuss workplace issues.

As a reminder, federal law prohibits retaliation against individuals who make, in good faith, reports of possible harassment. Accordingly, no one who provided information during this Review or who was interviewed should be subject to any retaliatory conduct.

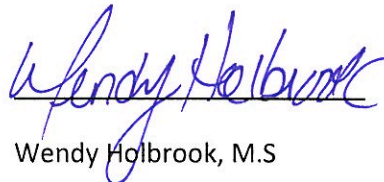


Graham L. Gillis, Ed.D

Interim Title IX Coordinator

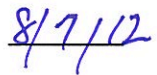


Date



Wendy Holbrook, M.S

Interim Deputy Title IX Coordinator



Date