



OHSU POLICY MANUAL

Policy Number: 03-05-048

Policy Title: DISCRIMINATION, HARASSMENT AND RETALIATION

Effective Date: May 25, 2023

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1. Policy

This policy defines prohibited discrimination, harassment (including sexual harassment), and retaliation; outlines reporting options and obligations; and describes the investigation process for complaints or reports of Discriminatory Misconduct. OHSU recognizes the strength that comes with being diverse in people and ideas and is committed to upholding respect and inclusion for all OHSU Members, who include both employees and learners. OHSU is committed to equal access to employment, programs and activities, admission, course offerings, and facilities, for all OHSU Members. Any form of prohibited discrimination, harassment, including sexual harassment and sexual misconduct, and retaliation have no place at OHSU.

It is the policy of OHSU to maintain an environment free of discrimination against any person because of their real or perceived “protected characteristic,” defined below. If the university finds that an OHSU Member has engaged in Discriminatory Misconduct under this Policy, it will take immediate and appropriate corrective action. Students who have engaged in Discriminatory Misconduct may face sanctions up to and including suspension or dismissal. Employees who have engaged in Discriminatory Misconduct may face discipline up to and including termination.

2. Policy Scope and Jurisdiction

This Policy applies to conduct that: (1) occurs on campus or property owned or controlled by OHSU; (2) occurs in the context of an OHSU employment or educational program or activity; (3) uses OHSU resources, such as telephones, computers, video conferencing technology, e-mail, or other means of electronic communication; or (4) creates a hostile environment for or causes substantial disruption to the OHSU community or any of its Members, as defined in Policy 01-01-000¹.

For reports involving OHSU Members or individuals who are not employed by or enrolled as students at OHSU, such as patients, contractors, visitors, volunteers, alumni, and guests, OHSU will determine the appropriate manner of investigation and resolution, which may

¹ OHSU Member is defined in OHSU Policy 01-01-000 to include: Members of the OHSU Board of Directors; Employees; Students and trainees; Volunteers; Visiting faculty, researchers, and healthcare practitioners; Contractors and vendor, while doing business with OHSU; or Others who work for or act on behalf of OHSU.

include, without limitation, referral to local law enforcement or to the school or employer of the third-party, and/or restriction from access to campus or OHSU programs, services or activities in accordance with the Restriction or Exclusion from Access to OHSU Resources and Property policy. OHSU's ability to investigate or take remedial action against a third-party is limited and will be determined by the nature of any substantiated misconduct and OHSU's relationship to the third-party.

This policy does not apply to misconduct or disrespectful treatment which is not based on a protected characteristic. Other OHSU policies, including the OHSU Code of Conduct, the Workplace Violence policy, or the Investigation of Potentially Criminal Conduct policy may apply to these forms of misconduct.

3. **Definitions** *[This section references acts of violence – including sexual and domestic violence – that may represent triggers for survivors and/or family members.]*

- A. **Protected Characteristic:** A protected characteristic for purposes of this policy includes race, color, religion, national origin, sex, sexual orientation, gender identity or expression, pregnancy (including pregnancy-related conditions), age, disability (including physical or mental disability), genetic information (including family medical history), ancestry, marital or familial status, citizenship, service in the uniformed services (all as defined in federal or state law), protected veteran status, expunged juvenile record, use of leave protected by state or federal law, use of the Worker's compensation system, and/or any other status protected by Oregon or Federal law.
- B. **Discriminatory Misconduct:** Conduct prohibited by this Policy, including Discrimination, Harassment, Sexual Harassment, Sexual Misconduct, Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Sexual Exploitation, and Retaliation.
- C. **Discrimination:** Generally, an adverse action taken against an individual or group on the basis of the individual's or group's protected characteristic(s). Discrimination takes two forms: disparate treatment and disparate impact. Disparate treatment occurs when the adverse action is motivated in whole or in part by the protected characteristic. Disparate impact occurs when a policy, requirement, or regularized practice, although neutral on its face, adversely impacts persons in a protected class without a legitimate university purpose. An adverse action includes an action that significantly changes the terms and conditions of employment or actions that have a significant detrimental impact on a student's education.
- D. **Harassment:** Harassment is a form of discrimination, and is unwelcome verbal or physical conduct based on a protected characteristic that is sufficiently severe or pervasive that it substantially interferes, or is likely to substantially interfere, with an individual's employment, education or access to university programs, activities, or opportunities, and would have such an effect on a reasonable person who is

similarly situated. Harassment may include, but is not limited to, severe or pervasive verbal statements or nonverbal or physical conduct, graphic or written statements, threats, slurs, symbols (including symbols of racist violence such as burning crosses and nooses), microaggressions (negative prejudicial slights and insults toward any individual or group), and misgendering (when a person is referred to using a pronoun, form of address or other language that is inconsistent with the gender in which they identify). Whether the alleged conduct unreasonably interferes depends on the totality of the particular circumstances, including the nature, frequency and duration of the conduct in question, the location and context in which it occurs, and the status of the individuals involved. Although the impacted party's perception of the offensiveness of the alleged conduct, standing alone, may not be sufficient by itself to constitute harassment in violation of this policy, consistent with trauma-informed practices, the impacted party's subjective experience is considered in all aspects of this analysis.

E. **Sexual Harassment:** Unwelcome conduct of a sexual nature (such as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature) when:

- (1) Submission to such conduct is made either explicitly or implicitly a term or condition of the individual's employment, academic experience or participation in any OHSU program or activity (quid pro quo); or
- (2) Such conduct is sufficiently severe or pervasive that it has the effect, intended or unintended, of unreasonably interfering with an individual's work or academic performance or it has created an intimidating, hostile or offensive environment and would have such an effect on a reasonable person. Although the impacted party's perception of the offensiveness of the alleged conduct, standing alone, is not sufficient by itself to constitute harassment in violation of this policy, consistent with trauma-informed practices, the impacted party's subjective experience is considered in all aspects of this analysis.

Examples of sexual harassment may include but are not limited to: (i) unwelcome, unwanted or offensive touching or physical contact of a sexual nature, such as closeness, impeding or blocking movement, assaulting or pinching; (ii) gestures; innuendoes; teasing, jokes, and other sexual talk; intimate inquiries; and (iii) persistent unwanted courting; sexist put-downs or insults; epithets; slurs; or derogatory comments.

F. **Sexual Misconduct:** Having or attempting to have sexual activity or contact with another individual without affirmative consent.

"Sexual activity or contact" means any intentional activity involving, or contact with, intimate body parts, either directly or through clothing, for the purpose of sexual

gratification or arousal. The term “intimate body parts” includes, but is not limited to, breasts, buttocks, groin, genitals, or other body parts that under the circumstances a reasonable person would know that the other person regards to be an intimate body part.

“Affirmative consent” is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity or contact. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity or contact. Silence or lack of resistance, in and of itself, does not demonstrate consent. An individual cannot provide affirmative consent if they are incapacitated. Consent can be withdrawn at any time. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression. Previous consent does not imply consent to sexual contact or activity in the future. It is the responsibility of each person involved to ensure they have the affirmative consent of the other(s) to engage in each sexual activity or contact.

G. ***Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Sexual Exploitation***: The crimes of Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Sexual Exploitation can also constitute sexual harassment when motivated or on the basis of a person’s sex.

- (1) “Sexual Assault” means an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, which includes any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent.
- (2) “Domestic Violence” means felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse of the victim under the domestic or family violence laws of Oregon, or by any other person against an adult or youth victim who is protected from that person's acts under Oregon domestic or family violence laws.
- (3) “Dating Violence” means violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship; (ii) The type of relationship; and (iii) The frequency of interaction between the persons involved in the relationship.
- (4) “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the

safety of others, or to suffer substantial emotional distress.

- (5) “Sexual Exploitation” means taking sexual advantage of another for one’s benefit, or to benefit or advantage anyone other than the one being exploited, by: (a) viewing, possessing, producing, or distributing child pornography; (b) non-consensual recording, disseminating, or copying of images, photography, video, or audio recording of sexual activity or nudity conducted in a private space; or (c) purposefully exposing another person to a sexually transmitted infection, or sexually transmitted disease, without their knowledge.

- H. **Retaliation:** Retaliation means a materially adverse action taken against an OHSU Member because the individual engaged in a protected activity. Adverse action means any action that is reasonably likely to deter a reasonable person from engaging in a protected activity. Examples of retaliation include a reprimand, discipline, or demotion. Adverse action does not include petty slights or trivial annoyances. Protected activity means (1) opposing a practice that is unlawful or that the individual reasonably believes is unlawful; (2) filing a report, serving as a witness, assisting someone with a report of unlawful activity or discriminatory misconduct, or participating in an investigation, proceeding or hearing pertaining to discriminatory misconduct; or (3) participating in the university’s reasonable accommodation processes.

4. **Reporting Avenues at OHSU**

A. **Filing a Report with OHSU**

OHSU encourages all OHSU Members who believe they have experienced any type of Discriminatory Misconduct defined in Section 3 under this Policy to report the incident immediately to the Office of Civil Rights Investigations and Compliance (OCIC) or by phone at 503-494-5148. Reports may be submitted anonymously, however OHSU may be limited in its ability to respond to anonymously submitted complaints. Identifying witnesses and providing as many details as possible in a report increases the university’s ability to respond and/or take corrective action.

Individuals are encouraged to report Discriminatory Misconduct as soon as possible in order to maximize OHSU’s ability to respond promptly and effectively. Although OHSU does not limit the timeframe for reporting, the passage of time may impact or limit the OHSU’s jurisdiction, the ability to impose discipline, and/or the ability to gather relevant evidence.

B. **Reporting to Law Enforcement**

A reporting party has the right to report, or decline to report, potential criminal conduct to law enforcement, in addition to other reporting obligations. Upon request, OHSU will assist a reporting party in contacting law enforcement at any

time. Where there is a threat to the health or safety of any OHSU member or to the extent a report involves potential criminal activity on OHSU's campus, OHSU may independently conduct a criminal investigation through the Department of Public Safety. An individual may make a report to OHSU, to law enforcement, to neither, or to both.

OHSU's resolution process and law enforcement investigations may be pursued simultaneously but will typically operate independently of one another. OHSU will, when appropriate, coordinate information with law enforcement if law enforcement is notified. OHSU may also pause its investigation to allow initial fact-gathering by law enforcement.

C. Confidential Resources

OHSU also offers a number of confidential resources for individuals who are unsure whether to report misconduct or who seek counseling or other emotional support in addition to, or without, making a report of Discriminatory Misconduct to OHSU. Confidential resources are (1) All health care and mental health professionals providing care as a treating professional at OHSU, including employees at the Student Health and Wellness Center, Faculty Wellness, Employee Assistance Program, and Confidential Advocacy Program (to the extent that they are providing care for sex-based harm); (2) the University's Ombuds and program staff (*Note: Ombuds do not have a legal privilege of confidentiality, and their information could be subpoenaed in a court of law, but under their professional code of ethics the Ombuds must take steps to avoid, whenever possible, disclosure of confidential records and information*).

Confidential resources will not make a report for an individual. This means that a report made only to a confidential resource will not be investigated and may not result in any discipline or sanctions against the person complained of.

D. External Complaints

OHSU encourages all OHSU Members with a complaint about Discriminatory Misconduct to follow the process in this Policy. However, individuals may always choose to make a discrimination complaint directly to outside agencies or law enforcement, including, but not limited to, the Bureau of Labor and Industries' Civil Rights Division, the Office for Civil Rights of the U.S. Department of Education, the U.S. Equal Employment Opportunity Commission, the Educational Opportunities Section of the Civil Rights Division of the U.S. Department of Justice, or the Accreditation Council for Graduate Medical Education.

5. **Expectations of OHSU Members When Notified of Discriminatory Misconduct**

A. **All OHSU Members**

OHSU asks all OHSU Members to do the following when responding to disclosures of Discriminatory Misconduct under this Policy:

- (1) Unless you are a designated Confidential Employee (defined below), inform the person if you have an obligation to report all Prohibited Discriminatory Misconduct to OCIC.
- (2) To the extent you are comfortable, listen to what the person wants to tell you before providing supportive resources, referrals, and information, including these resources. Don't feel the need to ask a lot of questions or gather information.
- (3) Be sensitive to the needs of the person who shares about the conduct, without judgment. Do not dismiss or minimize the concern.
- (4) Inform the person of reporting options, including the option to report to the OCIC or the Integrity Hotline.

In addition to these general expectations, all OHSU employees, with the exception of Confidential Employees, have the additional reporting obligations set forth below. All OHSU Members who are not employees or on the Board of Directors (*e.g.*, students, including graduate students; volunteers; visiting faculty, visiting researchers, and visiting healthcare practitioners; contractors and vendors) are encouraged, but not required, to report discriminatory misconduct. Anyone may meet with the Title IX Coordinator or a designee to learn more about the process before making a report.

B. **Confidential Employees**

OHSU has identified certain employee positions as Confidential Employees. Confidential Employees will not share information disclosed to them with others without the express written permission of the person making the disclosure or as required or permitted by applicable law or professional codes of ethics (such as cases involving imminent risk of serious harm).

The following employees are Confidential Employees under this Policy, when acting in their confidential role: (1) All health care and mental health professionals providing care as a treating professional at OHSU, including employees at the Student Health and Wellness Center, Faculty Wellness, Employee Assistance Program, and Confidential Advocacy Program; (2) The University's Ombuds and program staff (*Note*: Ombuds do not have a legal privilege of confidentiality, but

under their professional code of ethics the Ombuds must take steps to avoid, whenever possible, disclosure of confidential information).

C. All Other OHSU Members

Employees, including faculty, who are not Confidential Employees, have reporting obligations under this Policy. When an employee becomes aware of, or reasonably suspects, an alleged incident of Discriminatory Misconduct under this Policy that involves a student or employee, they are always obligated to report information they have to the OHSU's OCIC/Title IX Office. OHSU employees should be prepared to report the name, date, time, location, and description of the incident and involved parties to the extent such information is readily apparent, or freely shared, and to provide the notes of any conversations they had with the individuals. They otherwise will maintain privacy to the greatest extent possible. Anyone may meet with the Title IX Coordinator or a designee to learn more about the process before making a report. Employees who fail to report as required by this Policy may be subject to discipline or other appropriate corrective measures.

OHSU Members should not investigate any matter themselves. If an OHSU Member knows that a matter has already been brought to the attention of OCIC, or the Integrity Hotline, which refers directly to OCIC, the OHSU Member does not need to report it but is encouraged to bring any new or additional information to the attention of the OCIC/Title IX Office. OHSU Members are not required to share information disclosed during public awareness events (e.g. "student forums" and town halls) or as part of an Institutional Review Board-approved human subjects' research protocol.

OHSU employees receiving reports of Discriminatory Misconduct should:

- (1) Comply with the expectations for all OHSU Members set forth above.
- (2) Direct the person making the disclosure to this Policy and these confidential resources.
- (3) As soon as possible in the conversation, inform the person making the disclosure that the individual needs to make a report to OCIC, so that steps can be taken to stop the discrimination or harassment, remedy its effects, or prevent future instances of discrimination and harassment.
- (4) Report the incident to OCIC via the web form or the Integrity Hotline. In general, reports to the OCIC and/or referrals to other resources should be made while the person is with you, if possible, but in no event later than 24 hours after the person made the request.

- (5) For situations involving an immediate threat to someone's health or safety, the employee should call the Department of Public Safety. In all instances where there is a state law requirement to make a mandatory report to law enforcement or other agency, the person should follow state law.

6. **OHSU Response to Reports of Discriminatory Misconduct**

OHSU will respond promptly and effectively to reports of Discriminatory Misconduct. This may include action to stop, prevent, correct, and when necessary, discipline, behavior that violates this Policy. Depending upon the information available, OHSU will conduct an initial inquiry, or contact named parties whenever this is sufficient information that Discriminatory Misconduct, including sexual harassment, sexual assault, domestic violence, dating violence or stalking has occurred. In responding to incidents of Discriminatory Misconduct, OHSU will follow state and federal law, OHSU policies, and any applicable collective bargaining agreements. A responding party's options, and an anticipated timeline, will be explained to that person by OCIC, Human Resources, or the applicable student office, as appropriate.

A. **Supportive Measures**

Regardless of whether an investigation or other process is initiated, OHSU and/or the Title IX Coordinator may provide supportive measures as appropriate and reasonably available. In deciding which supportive measures to implement, OHSU will attempt to mitigate the impact on impacted persons, while also balancing the rights of the responding party.

Supportive measures for students may include academic arrangements, campus escort services, ombuds services, referrals to community agencies, and/or other reasonable measures. Students may also seek confidential resources such as health and counseling services, as well as financial assistance, and safety planning. All students who are impacted by (including Responding Parties) Discriminatory Misconduct may be entitled to supportive measures.

For employees, supportive measures may include change of employment conditions, leaves of absence, modifications to work schedules, safety planning, information and assistance regarding employee resources, and/or other reasonable measures. Employees may also seek confidential resources such as counseling services through the Employee Assistance Program or Resident and Faculty Wellness Program.

B. **Interim Actions**

After receiving a report of Discriminatory Misconduct, OHSU may implement interim action(s) during the pendency of the investigation. Interim actions will remain in place until lifted or modified by a university official with authority to do so. Interim actions aim to prevent the repetition of prohibited conduct, if

occurring, and eliminate opportunities for retaliation against a reporting or impacted party, other specified persons, or ongoing disruption to OHSU. The specific interim action(s) implemented will vary depending on the circumstances of each report. In some instances, the university may share information regarding such interim measures with an impacted party, or other appropriate individuals, on a need-to-know basis, such as safety planning. Interim actions for employee responding parties may include, but are not limited to, administrative leave or changing reporting lines. For students, interim actions may also include removal from campus and/or from some or all programs or activities.

C. Investigation of Reports

The OCIC is responsible for responding to reports of Discriminatory Misconduct under this Policy. Upon receipt of a report, impacted persons are offered support resources and the opportunity to meet with an OCIC Officer to share more about the experience and discuss options that may be available. If the report is made by a third-party, OCIC will consider any information from the third-party about how to reach out to the impacted person(s) thoughtfully. The impacted person is not obligated to meet with OCIC and retains agency over whether or not they choose to participate in an investigative or other process. Even if an impacted person chooses not to report formally and/or chooses not to participate in an investigation or resolution process, the impacted person can contact OCIC for information and assistance accessing on or off campus support resources and for information on available assistance.

Following that interview, the Officer determines whether the allegations, if proven true, would constitute a violation of this Policy and whether an investigation is warranted and appropriate. If so, and if the impacted person desires to move forward with an investigation, a formal notice is drafted and both the impacted person and responding party are provided notice that an investigation has been initiated, offered support resources, and offered an interview. If the allegations, even if proven true, would not constitute Discriminatory Misconduct, but would likely violate OHSU's Code of Conduct, OCIC will refer the report to Human Resources, the school, Patient Relations, the Office of Visitors and Volunteers, or other OHSU office with a direct relationship to the reporting or responding parties, as appropriate.

During the investigation, relevant witnesses for both parties are interviewed, and documents such as emails, text messages, photographs, and other documentary evidence are also considered. Determinations whether or not a violation of this Policy has occurred are based on a preponderance of the evidence standard, and responding parties are presumed not responsible unless and until a determination has been made that the policy has been violated. Operative procedures, including procedures for reports alleging a violation of Title IX and the documentation of reports and investigations are set forth in the OCIC Protocol.

D. Corrective Action

If the university finds that an OHSU Member has engaged in Discriminatory Misconduct under this Policy, it will take immediate and appropriate corrective action. Students who have engaged in Discriminatory Misconduct may face sanctions up to and including suspension or dismissal. Employees who have engaged in Discriminatory Misconduct may face discipline up to and including termination. OHSU community members who violate this Policy may be excluded from campus and may otherwise lose the right to use university property and/or to participate in OHSU-sponsored programs and activities. Consistent with trauma-informed practices and OHSU's Discipline Guide, the impact on individual OHSU Members and the community will be considered in determining appropriate corrective action.

E. Bad Faith Reports

A report is made in bad faith when it is intentionally dishonest. Individuals who make bad-faith reports may be subject to employment or student disciplinary action, employee code of conduct violations, student conduct code violations, or other appropriate corrective action.

F. Remedial Action

At any time following a report of Discriminatory Misconduct, the OCIC Director, Title IX Coordinator, the Provost or designee, and/or the Executive Vice President of Human Resources may review the report, investigative report, and/or any sanction to determine whether additional remedies for the parties or OHSU community are necessary to restore and preserve equal access to OHSU's education programs and activities or to maintain a respectful workplace. Examples of such remedies may include the initiation or continuation of supportive measures, facilitated dialogue, and/or training for OHSU Members, as well as modifications to academic, employment, or patient care conditions or assignments. Remedial, non-disciplinary action may also be taken where the alleged conduct does not constitute a policy violation, but additional incidents or escalation of conduct could give rise to a policy violation.

G. Confidentiality and Privacy

Information received in connection with the reporting, investigation, and resolution of allegations of Discriminatory Misconduct will be treated as private and will not be disclosed except to those individuals whom the university determines are necessary to conduct an appropriate investigation, to provide assistance and

resources to parties, to perform other appropriate university functions, or in accordance with applicable law.²

7. Workplace Fairness

In compliance with the Oregon Workplace Fairness Act, the university is required to notify employees of the following:

- A. Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence no later than five years after the occurrence of the violation. Claims against the university are also subject to the notice provisions set forth in ORS 30.275, which typically requires notice to OHSU within 180 days of the incident.
- B. OHSU will not require an employee to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault. An employee claiming to be aggrieved by discrimination, harassment, or sexual assault, and who has received a copy of OHSU policies, may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a nondisclosure, non-disparagement, or no-rehire provision and will have at least seven days to revoke any such agreement.
- C. Employees are encouraged to document any incidents involving conduct that constitutes prohibited discrimination under state or federal law.

8. Differential Treatment Required or Allowed by Law

Neither this Policy nor any OHSU Policy shall be interpreted as preventing OHSU from complying with laws that require or allow preferential treatment or from engaging in constitutional admissions, financial aid or other programs designed to promote diversity goals.

9. Policy Notifications and Responsibilities to Review

- A. Human Resources or the Applicable School or Program shall:
 - (1) Make this policy available to OHSU Members; and
 - (2) Provide a copy of the policy to each OHSU Member at the time of hire or enrollment and in any orientation materials provided to the OHSU Member and annually thereafter.

² OHSU will collect and maintain crime statistics, including de-identified data related to sexual violence for inclusion in OHSU Annual Security Reports, and for purposes of providing timely campus safety warnings, consistent with the Clery Act.

- B. The OCIC shall provide a copy of the policy to any person at the time that the person discloses information regarding Discriminatory Misconduct.
- C. All OHSU Members shall:
 - (1) Review this policy upon their initial hire, enrollment or appointment, and annually thereafter; and
 - (2) Sign an acknowledgement indicating the OHSU Member has read the policy and had the opportunity to ask questions.

Related Regulations:

**Title IX of the Education Amendments of 1972, 34 CFR Part 106 and 41 CFR Part 60
Oregon Revised Statute 659A**

Related Policies and Procedures:

**OHSU Code of Conduct
Policy 01-01-000, Definitions and Interpretations
Policy 07-30-020, Workplace Violence
Policy 07-30-025, Investigation of Potentially Criminal Conduct
OCIC website on Responding to Concerns
OCIC website on Sexual Misconduct and Title IX
OHSU Annual Security Report**

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