

COLUMBIA UNIVERSITY
OFFICE OF EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION
2017-2018 Annual Report

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I. INTRODUCTION

The University and the Office of Equal Opportunity and Affirmative Action (EOAA or the Office) take all reports of discrimination, harassment and gender-based misconduct seriously and EOAA takes action to resolve such concerns. EOAA is tasked with addressing, preventing, investigating, and resolving discrimination, discriminatory harassment and gender-based misconduct at Columbia University where the person accused of the conduct is a member of the faculty, staff or is affiliated with Columbia.

This Report provides information and data regarding the Office's work during the 2017-18 academic year. In particular, it covers information and data related to:

- the work of the Office to address discrimination, harassment and gender-based misconduct, including the training and education that EOAA conducts,
- EOAA's work with partner offices,
- how EOAA conducts investigations, and
- how issues of discrimination, harassment and gender based misconduct are addressed at Columbia.

The Report aims to provide the Columbia community with clear information about the scope of EOAA's work, including about the type and number of allegations that come to EOAA. Another goal is to share responses to questions frequently asked about EOAA's work by students, faculty and staff.

Going forward, the Office plans to publish this information on an annual basis.

We look forward to your questions, comments and suggestions both in response to this Report and throughout the year. You can reach EOAA at eoaa@columbia.edu.

II. OVERVIEW OF EOAA: RESOURCES, TRAINING AND EDUCATION

EOAA has overall responsibility for the management of the University's Non-Discrimination Statement and Policy and the University's *Employee Policies and Procedures on Discrimination, Harassment, Sexual Assault, Domestic Violence, Dating Violence and Stalking* (the Employee Non-Discrimination Policy). EOAA, in collaboration with the University Title IX Coordinator, also has overall responsibility for the management of the University's policies on Consensual Romantic and Sexual Relationships.¹

EOAA receives allegations and conducts investigations under the Employee Non-Discrimination Policy where the individual accused of the alleged behavior (called the Respondent) is a member of the faculty, staff or is a third-party affiliate. Third-party affiliates include contracted workers, University vendors, alumni, field placement supervisors, and individuals or organizations with whom Columbia partners.

EOAA also receives allegations and conducts investigations under Columbia's Consensual Relationship Policies.

¹ EOAA is also responsible for the Affirmative Action Programming with respect to employment at Columbia University. For more information, please see <https://eoaa.columbia.edu/affirmative-action>.

For more information about these policies and EOAA’s work, please also see our website: eoaa.columbia.edu.

a. Structure of the Office

EOAA is led by Associate Provost Heather Parlier (hp2450@columbia.edu) who reports to the Provost of the University.

In response to a strong increase in reporting of all types of cases before EOAA (discrimination and gender-based misconduct), the Office has increased education and training opportunities for the campus community and has increased staffing within the Office during the past few years. In the 2017-2018 academic year, EOAA hired a Director of Training and Education and a new EOAA Investigator. We also opened an office at the Columbia University Irving Medical Campus (CUIMC) in order to best serve the entire campus. In the 2018-2019 academic year, EOAA plans to hire an additional EOAA Investigator and a new position that will conduct a majority of the initial intake and will manage ongoing cases to ensure that Complainants and Respondents are given frequent updates and communications about open investigations.

All investigators and other members of EOAA receive specialized training related to proper investigative methods and to the subject matters under the purview of EOAA. Specifically, in the past academic year, EOAA received training related to trauma-informed interviewing, best practices with working with individuals with disabilities, investigative report writing, and more general training on New York State’s Enough is Enough law governing sexual assault cases on New York’s campuses, Title IX and other non-discrimination laws.

b. Prevention and Education

Education and Training

EOAA provides education and training sessions for faculty, staff, students and other members of the campus community (such as vendors) on a variety of topics including non-discrimination, sexual harassment, implicit bias, and best practices in recruiting and retaining a diverse faculty and staff. EOAA also works with departments and programs to create trainings that address specific issues that the department or program is facing. For example, EOAA created and provided a training titled “Jokes in the Workplace” to directly address issues about which a department had concerns. EOAA will also focus on a particular policy or issue, such as the Consensual Relationship Policies, if that policy or issue has been a source of concern for a department or program. EOAA also, in response to specific requests, conducted implicit bias workshops and facilitated discussions about creating inclusive spaces (classroom and workplace) with groups of faculty and groups of staff.

In the 2017-2018 academic year, EOAA conducted over 165 in-person trainings which included over 3,000 faculty and staff members.

c. Partner Offices

EOAA works closely with a number of offices on campus that work with students and employees.

- Sexual Violence Response
- Gender-Based Misconduct Office (within Student Conduct and Community Standards)
- Disability Services
- Human Resources
- Faculty Affairs
- Post-Doctoral Affairs

III. REPORTED VIOLATIONS & RESOLUTION OF VIOLATIONS

As noted above, this is the first EOAA report containing aggregate data regarding allegations of violations of the EOAA Policy and Consensual Relationship Policies. In doing this and in committing to annual reporting, EOAA aims to provide increased transparency and respond to the community's interest in learning more about our processes, investigations and determinations.

Together with the Gender-Based Misconduct Office's Annual Report on Gender-Based Misconduct Prevention and Response, available on Columbia's Sexual Respect website (<https://sexualrespect.columbia.edu/reports-and-research>), this Report will help to provide a fuller picture of Columbia's resources dedicated to preventing discrimination and harassment and to responding to allegations and incidents when they occur.

The data provided here is in the aggregate and is anonymous, as it is in the Gender-Based Misconduct Annual Report. This is to ensure that no information is disclosed that might, directly or indirectly, indicate the identity of any individual who comes to EOAA. It is vitally important that members of the Columbia community can report allegations without being concerned that their identity will be revealed to the general public.

Reports of EOAA Discrimination and Discriminatory Harassment Allegations

In the 2017-2018 academic year, EOAA received 174 allegations of discrimination and discriminatory harassment from individual Complainants. The number of discrimination and discriminatory harassment matters before EOAA increased by 54% from the prior academic year.

Where allegations included multiple charges, each charge is counted in the chart below (for example, if a single Complainant alleged that a Respondent discriminated on the basis of age, disability and race, each charge is counted in its individual category). This means that the total number of allegations is greater than the total number of complainants.

Type of Allegation	Number of Allegations Received by EOAA
Age	3
Disability	21
National Origin	21
Race or Color	60
Religion or Creed	15
Discrimination Type Not Specified	45
Failure to Report ²	4
Retaliation	5
Total	174

Discrimination Time Frames

In more than half of the discrimination cases, the matter was reviewed, and depending on the concern presented, the matter was resolved within thirty days of receipt of the allegation. The longest discrimination matter took 255 days to resolve and involved multiple allegations with amended allegations made during the course of the investigation.

A number of factors affect the time frame for resolving reports of Discrimination and Harassment. These factors may include:

² University policy requires certain types of employees, both faculty and staff, to report incidents of discrimination, discriminatory harassment and gender-based misconduct. Failure to report can result in a separate EOAA charge.

- Allowing a Complainant time to determine whether they would like to pursue a complaint with EOAA;
- Working with a Complainant and Respondent on an informal resolution;
- Arranging for interim measures so that all involved individuals are in a safe learning and working environment before proceeding with an investigation;
- Difficulty contacting parties or witnesses;
- Large numbers of witnesses or voluminous evidence

Reports of Consensual Relationship Policy Allegations

The Consensual Relationship Policies prohibit faculty and staff from engaging in consensual romantic or sexual relationships with anyone over whom they have academic authority or supervisory capacity. Each of the Policies can be found here:

<https://eoaa.columbia.edu/resources/eoaa-documents-downloading>

In the 2017-2018 academic year, EOAA received twelve (12) reports of violations of one of the Consensual Relationship Policies.

One (1) report alleged a violation of the Consensual Romantic and Sexual Relationship between Staff.

Eleven (11) reports alleged a violation of the Consensual Romantic and Sexual Relationship Policy between Faculty and Students.³

When the Office receives a report, we provide the student or employee over whom the Respondent has academic authority or supervisory capacity an opportunity to share their perspective with EOAA regarding the relationship. In this opportunity, the student or employee is not accused of violating the Policy; instead, they are considered a witness in the investigation of a potential Policy violation by the faculty or staff member.

Resolutions of Consensual Relationship Policy Allegations

Of the twelve allegations of a violation of a Consensual Relationship Policy, EOAA found one Respondent violated the Policy and that seven did not violate the Policy. Two Respondents were no longer affiliated with the University (one was deceased at the time EOAA received the allegations and the other had retired several years before EOAA received the allegations), one of the allegations did not contain enough information to launch an investigation (the identity of the student was unknown and EOAA was unable to learn more), and the allegation of the violation of the Consensual Relationship Policy between staff was managed by reorganizing the structure of reporting relationships.

³ This Policy applies to all officers of instruction, research and the libraries, including students with appointments as student officers of instruction and research and graduate and undergraduate teaching assistants. The use of the term “faculty” in the policy statement is not meant to restrict the policy’s application in any way but to underscore its special relevance to the faculty because of the roles they play in the education and development of the University’s students.

Reports to EOAA of Gender-Based Misconduct by Complainant & Respondent Affiliation

The charts below include data that indicates the status (undergraduate or graduate student, staff, faculty, or affiliate) of complainants and the status (faculty, staff, affiliate, or non-affiliate) of respondents in gender-based misconduct matters handled by EOAA.⁴ In the 2017-2018 academic year, the number of gender-based misconduct matters before EOAA increased by 46% from the prior academic year.

Affiliates are individuals who are contracted workers, University vendors, alumni, field placement supervisors, and organizations with whom Columbia partners to offer student internships. **Non-affiliates** include campus visitors without a relationship to the University and individuals without any relationship to Columbia (e.g. an individual walking down Broadway).

“**Sexual Misconduct**” includes: Sexual Assault: Intercourse, Sexual Assault: Contact, Sexual Assault: Type Not Specified by Reporter, Domestic Violence, Dating Violence, Sexual Exploitation, and Stalking. These categories were combined for reporting purposes to protect the privacy of Complainants and Respondents because of the small numbers of allegations under the individual categories.

Some reported cases involve more than one allegation of gender-based misconduct. In those cases, a “hierarchy of charges” was applied and the tabulations reflect the most serious charge. For example: one case that includes allegations of Sexual Assault and Sexual Harassment would be counted as one case of Sexual Assault.

EOAA Gender-Based Misconduct Reports by Identity of Complainant

	Undergraduate	Graduate & Non-degree Programs	Faculty	Staff	Affiliates
Sexual Misconduct	3	3	2	4	2
Sexual Harassment	7	22	4	25	15
Gender-Based Discrimination and/or Harassment	3	13	6	14	4
Retaliation	0	0	0	0	1

⁴ For information about reports of gender-based misconduct involving student respondents, please see the Gender-Based Misconduct Office’s Annual Report on Gender-Based Misconduct Prevention and Response, available on Columbia’s Sexual Respect website (<https://sexualrespect.columbia.edu/reports-and-research>)

EOAA Gender-Based Misconduct Reports by Identity of Respondent

	Faculty	Staff	Affiliate	Non-Affiliate
Sexual Misconduct	6	7	0	1
Sexual Harassment	27	24	8	3
Gender-Based Discrimination	23	22	1	0
Retaliation	0	0	1	0

Time Frames for Resolving EOAA Gender-Based Misconduct Cases

In the overwhelming majority of EOAA gender-based misconduct cases, the matter was reviewed, and, depending on the concern presented, the matter was resolved within 60 days of receipt of the allegation. In cases where there are multiple charges and multiple parties, the time frame to complete the investigation can take longer. The longest Gender-Based Misconduct case took 286 days and involved multiple Complainants with multiple allegations that spanned over a ten-year period.

	1-60 Days	61-120 Days	121-180 Days	181-240 Days	241-300 Days
Sexual Misconduct	2	-	2	2	-
Sexual Harassment	40	3	3		3
Gender-Based Discrimination	23	4	4	1	1
Retaliation	-	-	-	-	-

A number of factors affect the time frame for resolving reports of Discrimination and Harassment and Gender-Based Misconduct. These factors may include:

- Allowing a Complainant time to determine whether they would like to pursue a complaint with EOAA;
- Working with a Complainant and Respondent on an informal resolution;
- Arranging for interim measures so that all involved individuals are in a safe learning and working environment before proceeding with an investigation;
- Difficulty contacting parties or witnesses;
- Large numbers of witnesses or voluminous evidence

EOAA Gender-Based Misconduct Resolutions

Allegations come to EOAA from a wide array of sources. Some allegations come with full detail from the individual who experienced the alleged behavior, some allegations come from someone reporting on behalf of someone else and some allegations come to EOAA anonymously. EOAA works to address each allegation but can be limited by the amount of information we receive, whether or not someone will respond to EOAA or participate in the EOAA process, when and where the alleged behavior occurred (for example, EOAA has received allegations relating to behavior from more than 40 years ago), and whether or not someone is still a member of the campus community.

The charts below include aggregate data on the resolution of 1) cases involving sexual misconduct allegations and 2) cases involving sexual harassment, gender-based discrimination and retaliation allegations. Sanctions imposed on an individual when EOAA determines that there is a violation of EOAA Policy are discussed in detail in the following section.

EOAA Resolutions of Sexual Misconduct Cases

“Sexual Misconduct” includes: Sexual Assault: Intercourse, Sexual Assault: Contact, Sexual Assault: Type Not Specified by Reporter, Domestic Violence, Dating Violence, Sexual Exploitation, and Stalking. These categories were combined for reporting purposes to protect the privacy of Complainants and Respondents because of the small numbers of allegations under the individual categories.

	Sexual Misconduct
Finding of violation of EOAA Policy	3
Finding of no violation of EOAA Policy	2
Respondent no longer employed with or affiliated with the University	3
Investigation and disciplinary proceedings ongoing	1
Insufficient Information to pursue the matter	5

As documented in the chart above, EOAA received allegations of Sexual Misconduct against fourteen individuals (six faculty members, seven staff members and one non-affiliate). Of those individuals, three were found to have violated the EOAA Policy. Each of those individuals has or is being removed from the University.⁵

⁵ This number does not include Respondent’s in the above chart who are noted as no longer employed with or affiliated with the University.

EOAA Resolutions of Sexual Harassment, Gender-Based Discrimination and Retaliation Cases

	Sexual Harassment	Gender-Based Discrimination	Retaliation
Finding of violation of EOAA Policy	3	1	-
Finding of no violation of EOAA Policy	6	9	-
Respondent no longer employed with or affiliated with the University	2	-	-
Resolved through Informal Resolution	1	2	-
Allegations did not meet EOAA Policy definitions, matters referred to a partner office for adjudication and/or follow up.	3	1	-
Investigation and disciplinary proceedings ongoing	4	4	-
Insufficient Information to pursue the matter	2	1	-
Complainant did not respond to EOAA or declined to participate in the EOAA process	6	2	-

Resolution of EOAA Matters: Interim Measures & Sanctions

Interim measures – When EOAA receives an allegation of misconduct, whether it is discrimination, harassment, gender-based misconduct or related to a Consensual Relationship policy, the Office first determines whether interim measures to ensure safety to individuals involved in the misconduct and to the campus community are needed. This means that EOAA works with partner offices (such as Human Resources or Faculty Affairs) to determine whether the University should take a temporary action, while the EOAA process or investigation is pending, toward a Respondent. When appropriate given the specific facts before EOAA, the University has:

- Removed a Respondent from their job duties;
- Restricted a Respondent's access to campus or their academic space or workspace;
- Relocated a Respondent's workspace;
- Altered a Respondent's work schedule;
- Issued a no-contact directive to the individuals involved in an EOAA matter.

Sanctioning process – Upon completion of an investigation, EOAA makes a determination based on the preponderance of the evidence standard (whether it was more likely than not), whether the Respondent violated the EOAA Policy. If EOAA determines that the Respondent did not violate University Policy, the parties are notified and the case is closed. If EOAA determines that the Respondent did violate University Policy, the Office works with the Respondent's supervisor or other appropriate sanctioning officer to determine what discipline will be imposed on the Respondent.

Sanctions depend on the seriousness of the conduct and can range from written reprimands coupled with a required one-on-one specialized training to demotion, suspension or termination of employment from the University. In all cases where an individual was found to have violated University Policy, the Respondent is sanctioned.

Discipline is tailored to ensure that the sanction is fair and appropriate given the facts of the particular case; to ensure that it is consistent with the University's handling of similar cases; and that it is adequate to protect the safety of the campus community and reflects the seriousness of the conduct

Upon determination that a Respondent has violated the Policy, the University has:

- Issued a written reprimand or warning to Respondent;
- Altered the Respondent's job duties;
- Placed Respondent on disciplinary probation;
- Revoked Respondent's honors, awards, or privileges;
- Restricted Respondent's access to University facilities or activities (including student and alumni activities and campus organizations);
- Prohibited Respondent from advising students or hiring students for a defined period of time;
- Continued a no-contact directive;

- Removed instrumentalities used to aid in misconduct from Respondent (e.g. removed a couch from a Respondent's office);
- Relocated Respondent's University-provided residence;
- Removed Respondent from their University-provided residence;
- Demoted Respondent from leadership roles (e.g. removal as a Departmental Chair);
- Reduced Respondent's salary;
- Restricted Respondent's access to discretionary funds;
- Suspended Respondent from employment;
- Restricted Respondent from future University employment (if the Respondent no longer works at the University at the conclusion of the investigation);
- Terminated Respondent from employment.

The University may take additional measures to respond to the effects of the incident on the University community. Additional responses for the benefit of the University community may include:

- Increased monitoring, supervision, or security at locations or activities where the conduct occurred;
- Additional training and educational materials and opportunities for students and employees;
- Revision of University policies;
- Climate surveys.

IV. EOAA PROCESS

How To File a Complaint

EOAA accepts complaints about all forms of discrimination, discriminatory harassment and gender-based misconduct. Any member of the Columbia community who feels that they have been subjected to such conduct by a faculty member, staff member or third-party affiliate of the University may file a complaint by emailing EOAA: eoaa@columbia.edu, calling: 212-854-5511, or visiting our offices in 103 Low Memorial Library to make an appointment. EOAA also has an online reporting form available at eoaa.columbia.edu.

Complaints are assigned to EOAA investigators who investigate complaints under the Employee Non-Discrimination Policy and the Consensual Relationship Policies. The EOAA investigators serve as neutral fact-finders who interview parties and witnesses, review evidence, make credibility assessments and determine whether or not the Respondent(s) violated either the Employee Non-Discrimination Policy or applicable Consensual Relationship Policy.

In the EOAA process, a Complainant is the person who experienced the alleged misconduct and the Respondent is the person alleged to have engaged in the misconduct. In both the discrimination process and the gender-based misconduct process, a Complainant may decide not to participate in the investigative process. Depending on the facts known to EOAA and the nature of the allegations, EOAA may proceed with an investigation without the Complainant's participation. This is done in limited circumstances where there is a concern about the safety of the campus community or where the Office has received multiple allegations of a similar nature.

There are two separate processes within EOAA, one for discrimination and harassment cases and one for gender-based misconduct cases. The significant differences between the processes are the case management and right to an advisor, which is available in a gender-based misconduct case, as described in the EOAA Policy, and that both Complainant and Respondent, in the gender-based misconduct process, are able to review a fact summary and provide a response prior to the issuance of the final EOAA investigative report. Otherwise, the investigative processes for both types of cases is handled in the same way.

Initial Outreach

When a student reports an issue of gender-based misconduct to EOAA, that student is first provided with case management. Case managers from the Gender-Based Misconduct Office support all students who file a complaint of gender-based misconduct with EOAA.

Case Managers serve as the primary resource to support students and ensure that students understand their rights within the EOAA Policy and, if necessary, the investigation process. Case managers share resources and information about the investigation process during their initial meeting with students and, as needed, meet with students throughout the investigative process.

Once a student has received outreach from or has connected with a Case Manager, an EOAA investigator reaches out to that student to explain the EOAA process and to conduct an initial intake of the allegations.

If the individual filing a complaint is not a student with an allegation of gender-based misconduct, they are not assigned a Case Manager, and, instead EOAA reaches out to explain the EOAA process and to conduct an initial intake of the allegations.

If a Complainant decides that they do not want to speak with EOAA or decides after speaking with EOAA that they do not want to initiate an investigation or participate in the EOAA process in any way, they have that option. EOAA will let the Complainant know that if, at any time, they change their mind and do want to speak with the Office, they may do so. In limited circumstances, and in consultation with the University Title IX Coordinator, EOAA may proceed with an investigation if the allegations impact the safety of the campus community.

Informal Resolution

There are a number of options if an individual does not want to pursue a formal complaint and investigative process with EOAA. Currently, in cases that do not involve allegations of sexual assault, domestic violence, dating violence, or stalking, EOAA can assist with an informal resolution.

Individuals who believe that they have experienced discrimination or harassment may choose to work with the alleged offender directly with a face-to-face discussion or some other form of communication without the involvement of EOAA. EOAA can also work to informally resolve a matter, either prior to or during an investigation. Informal resolution can only be used when both the Complainant and Respondent and EOAA agree to such a resolution. Informal resolution, when facilitated by EOAA, includes mediation between individuals or a group of individuals, conducting training for an individual, group or entire department, working out ground rules for a work environment or facilitating an apology, or a combination of these options. EOAA works to tailor the informal resolution to best address the specific concerns raised.

Accommodations & Interim Measures

Where appropriate and as necessary, EOAA works with anyone affected by alleged discrimination, harassment or gender-based misconduct to ensure their safety and to ensure that they can continue to learn and work in their environment. EOAA will work with various campus offices to help individuals receive accommodations and support or to impose interim measures while an investigation is pending. Such measure may include reassigning or removing an employee, changing work schedules, assisting in reassignment of course schedules or housing location or issuing no contact directives between individuals.

Advisors

Students alleging any instance of gender-based misconduct may be accompanied by the advisor of their choice to any EOAA meeting related to the allegations. If a student with such an allegation wants to have an attorney serve as their advisor, the University will arrange for an attorney-advisor for the student, the cost of which will be sustained by the University.

For faculty, staff, and third-party affiliate respondents, if a student alleging any instance of gender-based misconduct chooses to be accompanied by an advisor, the employee is permitted to be accompanied by an advisor as well. In cases involving allegations of sexual assault, domestic violence, dating violence and stalking, both faculty, staff or third-party Complainants and

Respondents are allowed to bring an advisor or attorney-advisor of their choice to all EOAA meetings related to the investigation.

Any employee participating in an EOAA investigative meeting who is a member of a collective bargaining unit may be accompanied union representation.

Investigations

Once EOAA receives an allegation that falls under the EOAA Policy or the Consensual Relationship Policies, the Office will initiate an investigation. As noted above, a Complainant can decline to participate in an EOAA investigation or can ask that their identity not be disclosed to the Respondent or anyone else involved in the investigation. EOAA considers all such requests in light of the University's commitment to provide a safe and non-discriminatory environment for all members of the University community.

The assigned EOAA investigator will interview the Complainant, Respondent and any relevant witnesses. EOAA will also review any pertinent evidence including emails, text messages or social media posts and any available video footage or other University records (e.g. course schedules) that may be related to the allegations. The EOAA investigator then writes an investigative report that determines whether, based on a preponderance of the evidence standard (whether it is more likely than not), the Respondent violated the EOAA Policy or Consensual Relationship Policy.

Once EOAA reaches its conclusion, the Office communicates the findings to the Complainant and Respondent.

Sanctions & Discipline

When a Respondent is found to have violated the EOAA Policy or the Consensual Relationship Policy, EOAA communicates that finding to the Respondent's supervisor or to the appropriate sanctioning officer. EOAA will work with the supervisor to recommend appropriate sanctions or discipline. The discipline should be tailored to ensure that it is fair and appropriate given the facts of the particular case; to ensure that it is consistent with the University's handling of similar cases; and that it is adequate to protect the safety of the campus community and reflects the seriousness of the conduct.

Discipline can include:

- A written reprimand or warning
- Alteration of the Respondent's job duties
- Disciplinary probation
- Revocation of honors, awards, privileges
- Restricted access to University facilities or activities (including student activities and campus organizations)
- Prohibition from advising students or having students as research assistants for a defined period of time
- "No contact" order
- Loss of instrumentalities used to aid in misconduct

- Relocation of Respondent's University-provided residence
- Demotion from leadership roles
- Salary reduction and/or restrictions on access to discretionary funds
- Suspension
- Dismissal or restriction from University employment

The University may also determine that additional measures are appropriate to respond to the effects of the incident on the University community. Additional responses for the benefit of the University community may include:

- Increased monitoring, supervision, or security at locations or activities where the conduct occurred
- Additional training and educational materials and opportunities for students and employees
- Revision of University policies
- Climate surveys

Appeals

Both the Complainant and Respondent have the right to appeal an EOAA determination. There are two grounds for appeal: 1) the individual has new information, unavailable at the time of the investigation, that may change the outcome or 2) there was a procedural error that may have impacted the outcome. The appeal is sent to the Associate Provost who designates a trained Appeal Officer for review. The Appeal Officer conducts a review and submits a recommendation to the Provost.