

Sexual Harassment, Sexual Assault, Sexual Misconduct, Relationship (Dating) Violence and Stalking Policy

Nondiscrimination Statement

The Cranbrook Academy of Art (Cranbrook) prohibits discrimination based on sex in employment and education programs and activities both on and off campus. This policy applies to all students and employees and to conduct on school grounds, off-campus, at school-sponsored activities, and through technology resources provided by or used at Cranbrook. Violation of this policy is considered violation of the Student Code of Conduct.

Title IX of the Education Amendments of 1972 and other laws,¹ prohibit discrimination on the basis of sex in employment and education programs and activities. Title IX protects all persons from sex discrimination, which includes sexual harassment and sexual violence. Cranbrook will process all sex discrimination complaints it receives, including complaints of sexual harassment and sexual violence, regardless of where the conduct occurred, to determine whether the conduct occurred in the context of an employment or education program or activity, or had continuing effects on campus. If alleged off-campus sexual harassment or sexual violence occurred in the context of an education program or activity or had continuing effects on campus, the complaint will be treated the same as a complaint involving on-campus conduct. This includes complaints of sexual assault or harassment by students, employees, and third parties.

A. Title IX Liaison and Coordinator

Complaints of sexual assault, sexual harassment or other conduct prohibited under this policy and inquiries concerning the application of Title IX and its regulations should be directed to the Cranbrook Academy of Art's Title IX Liaison:

Cranbrook Academy of Art Title IX Liaison

Judy Dyki, Director of Library and Academic Programs/Academy Title IX Coordinator
Cranbrook Academy of Art
39221 Woodward Avenue
Art Academy Administration, 2nd Floor
Bloomfield Hills, MI 48303-0801
(248) 645-3090; jdyki@cranbrook.edu

The Title IX coordinator's responsibilities include investigating or overseeing the investigation of all incidents of alleged sexual assault or harassment; ensuring that consistent standards and practices apply to all investigations; being available to meet with students and employees who believe sexual assault or harassment has occurred; and assisting campus security or law enforcement as needed.

Cranbrook Educational Community Title IX Coordinator

Beth Beadle, HR Manager
Cranbrook Educational Community
39221 Woodward Avenue
Cranbrook House, 1st Floor
Bloomfield Hills, MI 48303-0801
(248) 645-3165
bbeadle@cranbrook.edu

Students may also contact the U.S. Department of Education, Office for Civil Rights, (800)421-3481 or ocr@ed.gov.

B. Policy Definitions

Sex discrimination is an adverse action taken against an individual because of sex, including sexual harassment, sexual violence, domestic violence, dating violence, and stalking, as prohibited by Title IX, Title IV, VAWA/Campus SaVE Act, and other laws and regulations. Both men and women can be victims of sex discrimination.

Sexual harassment is any unwelcome conduct of a sexual nature. This includes unwelcome verbal, nonverbal or physical conduct including but not limited to unwelcome sexual advances; requests for sexual favors; and other verbal, nonverbal, or physical conduct of a sexual nature, such as sexual violence, and indecent exposure, where:

¹Title IX of the Education Amendments of 1972, as amended, and its implementing regulations, 34 C.F.R. Part 106 ("Title IX"); the Violence Against Women Reauthorization Act of 2013 (20 U.S.C. 1092(f)) (VAWA), also known as the Campus Sexual Violence Elimination Act (Campus SaVE Act); and Title VII of the Civil Rights Act of 1964, as amended.

- a. Submission to, or rejection of, the conduct is explicitly or implicitly used as the basis for any decision affecting a student's academic status or progress, or access to benefits and services, honors, programs, or activities available at or through Cranbrook; *or*
- b. Such conduct is unwelcome; *or*
- c. Submission to, or rejection of, the conduct by a Cranbrook employee is explicitly or implicitly used as the basis for any decision affecting a term or condition of employment, or an employment decision or action; *or*
- d. Such conduct is sufficiently severe or pervasive to create a hostile educational or employment environment.

Sexual Harassment also includes acts of verbal, non-verbal (e.g., written) and physical aggression, intimidation or hostility based on sex or gender stereotyping, even if these acts are not sexual in nature.

Sexual Violence is a form of sexual harassment and means physical sexual acts, such as unwelcome sexual touching, sexual assault, sexual battery, rape, domestic violence, dating violence, and stalking (if based on sex), taken against an individual against his or her will and without consent or against an individual who is incapable of giving consent due to the use of drugs or alcohol, being a minor, or an intellectual or other disability. Sexual violence includes acts of physical force, violence, threats, and intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through drugs or alcohol, or taking advantage of another person's incapacitation, including voluntary drug or alcohol intoxication.

Incapacitated means the victim is temporarily incapable of appraising or controlling his/her conduct due to the influence of a narcotic, anesthetic or other substance administered without consent or due to any other act committed upon the victim without consent.²

Sexual violence can be carried out by school employees, other students, or third parties. All such acts of sexual violence are forms of sex discrimination prohibited by Title IX. Both men and women can be victims of sexual violence.

Statutory Rape is unlawful sexual intercourse with a minor under 18 years old, even if the intercourse is consensual. Under Michigan law, children under the age of 16 cannot consent to conduct of a sexual nature, and children under the age of 18 cannot consent to conduct of a sexual nature when the other person is a teacher, a substitute teacher, or a school employee, contractual service provider, or administrator.

Sexual Assault is a form of sexual violence and means (1) forcing or coercing an individual to engage in any non-consensual sexual contact or sexual penetration; or (2) an attempt to commit an unlawful act that places another person in reasonable apprehension of immediate, non-consensual physical contact for sexual purposes.

Sexual Battery is a form of sexual violence and means an intentional, unconsented to and harmful or offensive touching of the person of another, or of something closely connected with the person, for sexual purposes.³

Rape is a form of sexual violence that may or may not involve force or a threat of force, coercion, violence, or immediate bodily injury, threats of future retaliation, or duress. Rape means nonconsensual sexual intercourse or sexual penetration, which, in addition to intercourse, means nonconsensual cunnilingus, fellatio, anal intercourse, or any other intrusion, however slight, of any part of a person's body or of any object into the genital or anal openings of another person's body.⁴ Any sexual penetration is sufficient to constitute rape. Sexual acts are considered non-consensual when they involve a person who is incapable of giving consent because s/he is incapacitated from alcohol and/or drugs, is under 18 years old, or due to a mental or physical disability is incapable of giving consent.⁵

Acquaintance Rape is a form of sexual violence committed by an individual known to the victim. This includes a person the victim may have just met, such as at a party, been introduced to through a friend, or met on a social networking website (*see above for definition of rape.*)

Consent means an informed and conscious decision by each participant to engage in mutually agreed-upon sexual activity. Once consent is withdrawn or revoked, the sexual activity must stop immediately.

- Consent must be **voluntary** and given without coercion, force, threats, or intimidation.
- Consent can be **withdrawn or revoked**. Consent to one form of sexual activity (or one sexual act) does not constitute consent to other forms of sexual activity (or other sexual acts). Consent to sexual activity given on one

²Under Michigan law, persons who are drugged, incapacitated, or under the age of 16 are unable to give consent.

³MICH. COMP. LAWS ANN. § 750.520b Criminal sexual conduct in the first degree.

⁴MICH. COMP. LAWS ANN. § 750.520a Definitions.

⁵MICH. COMP. LAWS ANN. § 750.520a Definitions.

occasion does not constitute consent to sexual activity on another occasion. The fact that two people are or were in a dating or sexual relationship does not constitute consent to engage in sexual activity.

- Consent cannot be given by a person who is **incapacitated**. A person cannot give consent if s/he is unconscious or coming in and out of consciousness. Examples of incapacitation include unconsciousness, sleep and blackouts. Whether an *intoxicated* person (as a result of using alcohol or other drugs) is *incapacitated* depends on the extent to which the person's decision-making capacity, awareness of consequences, and ability to make fully informed judgments is impaired.

- Being intoxicated by drugs or alcohol does not diminish a person's responsibility to obtain consent from the other party before engaging in sexual activity. Factors to be considered when determining culpability include whether the person knew, or whether a reasonable person in the accused's position should have known, that the victim could not give, did not give, or revoked, consent; was incapacitated; or was otherwise incapable of giving consent.

Domestic Violence is a form of sexual violence and means abuse committed against a person who is a spouse or former spouse of the abuser, an person with whom the abuser resides or has resided in the past, a person with whom the abuser has or has had a dating or sexual relationship, a person with whom the abuser is or was related by marriage, or a person with whom with the abuser has a child. As to these persons, domestic violence means causing or attempting to cause them physical or mental harm, placing them in fear of mental or physical harm, causing or attempting to cause them to engage in involuntary sexual activity by force, threat of force, or duress, or engaging in activity toward them that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested.⁶

Dating Violence is a form of sexual violence, and is abuse committed by a person who is or has been in a social or dating relationship of a romantic or intimate nature with the victim. This may include a new acquaintance or person the complainant just met; *i.e.*, at a party, introduced through a friend, or on a social networking website.

Stalking means a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others, or suffer substantial emotional distress. For purposes of this definition,

- i. "Course of conduct" means two or more acts, including but not limited to acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- ii. "Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- iii. "Reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim.

Hostile Educational Environment. Harassment creates a hostile environment when the conduct is sufficiently severe, pervasive, or persistent to interfere with or limit a student's ability to participate in or benefit from the services, activities, or opportunities offered by a school.

Bystander Intervention. Safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention includes:

- Recognizing situations of potential harm
- Understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking actions to intervene.

Proceeding. All activities related to a non-criminal resolution of a disciplinary complaint, including, but not limited to, fact finding investigations, formal or information meetings, and hearings.

Result. Any internal, interim, and final decision by the official authorized to resolve disciplinary matters within the institution. The result must include any sanctions imposed by the institution.

C. Prohibited Conduct

Any conduct by an employee, student, or third party that denies or limits the ability of a student or employee to participate in or receive the benefits, services, or opportunities of employment or any Cranbrook program or activity based on sex is prohibited. This includes any circumstance where:

⁶MICH. COMP. LAWS ANN. § 400.1501 Definitions.

1. An employment or educational decision or benefit is conditioned on submission to unwelcome sexual advances or conduct;
2. Submission to, or rejection of, unwelcome sexual conduct is used as a basis for denying employment or an opportunity to participate in or benefit from any school program or activity;
3. Conduct has the purpose or effect of unreasonably interfering with, denying or limiting a student ability to participate in or benefit from any school program or activity or a term, condition or benefit of employment;
4. Conduct alters the educational environment to the degree that it adversely affects the student's ability to participate in or benefit from any school program whether or not that student is the target of the harassment;
5. There is a pattern and practice of sexual harassment;
6. A teacher, administrator or other person in a position of authority engages in sex discrimination or sexual harassment of a student or employee; and/or
7. A student or a group of students engages in sexual harassment of another student or students.

The following are examples of behaviors that are prohibited under this policy. This is not intended to be an exhaustive list:

8. Unwelcome sexual flirtations, advances or propositions;
9. Derogatory, vulgar or graphic written or oral statements regarding one's sexuality;
10. Unwanted touching, patting, pinching, or other attention to an individual's body;
11. Attempted or actual physical assault;
12. Any nonconsensual sexual act, including but not limited to, rape, sexual assault, sexual battery and sexual coercion;
13. Unwelcome sexual comments, innuendoes, suggestions or jokes;
14. Display of sexually suggestive pictures or objects;
15. Domestic violence, dating violence, sexual violence, and stalking, including cyberstalking;
16. Sending text messages, e-mails, or other electronic communications with nude or sexually suggestive photos, videos, or other images; and
17. Sharing or sending nude or sexually suggestive images over the Internet.

This policy specifically includes electronic communications, including but not limited to phone calls, text messages, e-mail, and communications using social media such as Instagram, Snapchat, Twitter, MEMES, GIFs and Facebook.

D. Reporting Sexual Misconduct or Filing a Complaint

Where to report. Sexual assault, sexual harassment and other behavior prohibited by this policy should be reported to Judy Dyki, Title IX coordinator, at (248) 645-3364 or jdyki@cranbrook.edu. A complaint or report may be verbal or written and does not need to take a particular form.

Students may also report any incident of sexual violence or sexual harassment that may create or contribute to the creation of a hostile environment to any instructor or school employee. Students, staff and faculty may notify the head of their department or unit, their supervisor, or any member of the administration with whom they are comfortable. Any instructor or other employee receiving such a report is responsible for reporting it to the Title IX coordinator. Failure to comply with this policy shall be grounds for disciplinary action, up to and including termination.

What to expect. A representative of Cranbrook will meet with the complainant, provide a copy of this policy, and explain:

1. The importance of seeking immediate medical attention for sexual assaults
2. The importance of preserving evidence
3. The right to report a crime to campus or local law enforcement
4. The right to simultaneously file both a criminal complaint with campus security or local law enforcement and an institutional Title IX complaint
5. The right to assistance from school officials with filing a criminal complaint, if assistance is requested
6. Internal options, including informal and formal resolution⁷

⁷Mediation cannot be used in cases of alleged sexual assault.

7. Available health care, victim advocacy, academic support, mental health, legal assistance resources and counseling services available both on and off campus, such as sexual assault resource centers, campus health centers, and pastoral counselors, including Abby Segal (the Academy's contracted counselor), Common Ground Mental Health Services, and HAVEN, a sexual assault counseling center providing specialized, comprehensive services in the areas of domestic violence and sexual assault
8. Prohibitions against retaliation
9. Interim measures that may be put in place, including a no-contact order pending the outcome of the investigation, providing support services, changing living arrangements or course schedules, assignments, or tests, and temporary removal of the alleged perpetrator from the campus community pending the outcome of an investigation.
10. Options for avoiding contact with the alleged perpetrator(s), including being allowed to change academic and extracurricular activities and living, transportation, dining, and working situations as appropriate

When taking steps to separate complainants from alleged perpetrators, Cranbrook will attempt to minimize the burden on the complainant.

Confidentiality. Cranbrook will make reasonable and appropriate efforts to preserve student complainants' and alleged perpetrators' privacy and to protect the confidentiality of information. Cranbrook will only disclose information regarding complaints under this policy on a need to know basis, primarily to persons who are responsible for its investigation and any reporting requirements.

Cranbrook strongly supports a student complainant's interest in confidentiality in cases involving sexual violence. If a student complainant requests confidentiality, the Title IX coordinator will determine whether Cranbrook can honor this request while providing a safe and nondiscriminatory environment for all students, including the student who reported the sexual violence. A student complainant's request for confidentiality could preclude a meaningful investigation; therefore, Cranbrook will consider whether there are circumstances present that demonstrate a risk that the alleged perpetrator may commit additional acts of sexual violence or other violence. These include whether other sexual violence complaints have been received about the same alleged perpetrator; whether the alleged perpetrator has a history of arrests; whether the alleged perpetrator has records from a prior school indicating a history of violence; whether the alleged perpetrator threatened further sexual violence or other violence against the student or others; and whether the sexual violence was committed by multiple perpetrators. Other factors include whether the sexual violence was perpetrated with a weapon, and the age of the student subjected to the sexual violence.

If the complainant asks that the complaint not be pursued, Cranbrook will take reasonable steps to investigate and respond to the complaint consistent with the request not to pursue an investigation.

Even when a student asks that a complaint not be pursued or that information be kept confidential, if necessary, Cranbrook will take action to protect the student. This includes providing support services and changing living arrangements or course schedules, assignments, or tests as appropriate.

E. Investigation

Complaints under this policy will be investigated by the Title IX coordinator or a designee (referred as the "investigator") in a prompt, fair, and impartial process from the initial investigation to the final result. Other Academy officials may assist in gathering facts during the investigation and information from campus security or local law enforcement officials may be considered. Both parties will be given the same opportunity to present relevant evidence and witnesses, including character witnesses. If the alleged perpetrator is allowed to review the complainant's statement, the complainant may also review any statement by the alleged perpetrator.

Relevant Information for Investigation. At the outset of an investigation, the Title IX coordinator (or designee) will notify the alleged perpetrator of the allegations against him or her and request a written response. In addition, the Title IX coordinator (or designee) may collect and consider the following types of information:

- Statements by witnesses to the alleged incident(s);
- Evidence about the credibility of the alleged victim and the alleged harasser;
- Evidence that the alleged harasser has been found to have harassed other victims;
- Evidence that the alleged victim has made false allegations against other individuals;
- Evidence as to the alleged victim's reaction or behavior after the alleged harassment;
- Evidence as to whether the alleged victim filed a complaint or took other action to protest the conduct soon after the incident occurred; and

- Other evidence of the harassment (e.g., reporting conduct to parents, counselors or friends, medical records, *et cetera*)
- The fact of a current or previous consensual dating or sexual relationship between the parties will not imply consent or preclude a finding of sexual violence.

Evidentiary Determinations. The Title IX coordinator/investigator has broad discretion in determining whether a proffered witness or documentary information would be relevant or helpful to a determination.

Evidentiary Standard. Based on the circumstances, a “preponderance of the evidence” or other legally appropriate standard will be used. “Preponderance of the evidence” means that it is more likely than not that conduct in violation of this policy occurred.

Time Frame for Investigation. An investigation should normally be completed within 60 calendar days after notice of a complaint. This time may be extended for good cause, including breaks or the unavailability of the complainant or alleged perpetrator. A written decision should be provided to the parties within fifteen calendar days after completion of the investigation.

Cooperation. All faculty, staff and students are required to cooperate in the investigation process.

Notice of Investigation. At the outset of an investigation, the investigator will advise the alleged perpetrator of the allegations against him or her in writing.

Opportunity to Participate. Both the complainant and the alleged perpetrator will have the same opportunity to meet with the investigator, to submit relevant documentary or other information and evidence, and to request that the investigator meet with relevant witnesses and evaluate written documents and statements.

Pending criminal matters. Internal investigation of a sexual assault allegation will proceed even if a criminal matter is pending. However, Cranbrook may temporarily delay the fact-finding portion of a Title IX investigation while the police or other law enforcement officials are gathering evidence and/or if requested to do so by law enforcement officials.

F. Decision and Findings

Following completion of the investigation and review of all materials, Title IX coordinator (or the person who conducted the investigation) will normally prepare findings including whether the allegations were substantiated, and if so, the disciplinary and recommended remedial measures. The decision will be provided to both parties, although the content of each letter may be modified subject to the limitations of FERPA and other federal or state privacy laws.

If the Title IX coordinator determines that a sexual harassment claim is proven by a preponderance of the evidence (*i.e.*, that it is more likely than not that sexual harassment occurred), he/she will recommend immediate action to end the harassment and prevent its reoccurrence. The recommended action will depend on the degree of control the school has over the harasser and the nature, frequency and severity of the substantiated sexual harassment. In all instances, the Title IX coordinator will follow up and communicate with the complainant at the conclusion of the investigation.

Sanctions and protective measures. Depending on whether the alleged harasser is a student, teacher, staff member, or third party, sanctions can include a verbal warning, written reprimand, a no-contact order, short-term or long-term suspension, expulsion, or dismissal/termination. Counseling for the complainant and the harasser will also be considered as remedial action. In addition, the following is a non-exclusive list of protective measures that may be imposed following a final determination of rape, acquaintance rape, domestic violence, dating violence, sexual assault, or stalking:

Protective or remedial measures. Available protective and remedial measures include, but are not limited to:

- a. Providing an escort to ensure that the complainant can move safely between classes and activities including employment;
- b. Ensuring the complainant and perpetrator do not share classes, extracurricular activities, or work environments;
- c. Moving the perpetrator or complainant (if the complainant requests to be moved) to a different residence hall or, in the case of an elementary or secondary school student, to another school within the district;
- d. Providing comprehensive, holistic victim services including medical, counseling and academic support services, such as tutoring;

- e. Arranging for the complainant to have extra time to complete or re-take a class or withdraw from a class without an academic or financial penalty; and
- f. Reviewing any disciplinary actions taken against the complainant to see whether there is a causal connection between the sexual violence and the misconduct that may have resulted in the complainant being disciplined

Any sanction imposed on the perpetrator of sexual assault or harassment that relates directly to the victim, such as a “no contact” order, transfer to different classes or housing, or a suspension will be disclosed to the complainant. The perpetrator will not be notified of the individual remedies offered or provided to the complainant. In cases of alleged sexual violence, the result of the hearing and any sanction imposed will be disclosed to both parties regardless of whether the hearing concludes an assault was committed

Appeal procedures are detailed in the “Sexual Harassment, sexual assault, sexual misconduct, relationship (dating) violence and stalking disciplinary procedures.”

G. Informal Resolution

If the complainant requests mediation or informal resolution, he/she will not be required to work out problems directly with the accused individual. Mediation cannot be used in cases of alleged sexual assault. In addition, the complainant has the right to terminate the informal resolution procedure at any time and pursue a formal complaint.

H. Alleged Student Perpetrator’s Rights Under the Family Educational Rights and Privacy Act (FERPA)

Under FERPA, an alleged student perpetrator may ask to inspect and review information about the allegations against him or her if the information directly relates to the alleged student perpetrator and is maintained as an education record. In such a case, Cranbrook will either redact the complainant’s name and all identifying information before allowing the alleged perpetrator to inspect and review the sections of the complaint that relate to him or her, or notify the alleged perpetrator of the specific information in the complaint that is about the alleged perpetrator. See 34 C.F.R. § 99.12(a).

I. Non-retaliation

Retaliation against a student, employee, or other individual who reports or complains about sex discrimination to an appropriate school official or participates in a report, investigation or proceeding involving a claim or allegation under this policy because he or she made a complaint, testified, or participated in an investigation or proceedings is prohibited.

J. Dissemination of Policy

This policy must be distributed to:

1. Students (provided annually, in person, during one-on-one fall registration in form of CAA Student Handbook and separate printed document; via email link in the annual Safety and Security report distributed via Hotline)
2. Administrators, faculty, and other employees (provided annually – CAA catalog; via email link in the annual Safety and Security report distributed via Hotline and/or via email to each employee’s Cranbrook email address)
3. Applicants for admission (available via www.cranbrookart.edu)
4. Applicants for employment (available via www.cranbrookart.edu)

This policy must be available:

1. On the school website (www.cranbrookart.edu; CAA intranet for students/staff)
2. In hard copy at multiple campus locations (Enrollment/Student Services; Library)
3. In both printed and electronic publications, including student handbooks, codes of conduct, and catalogs (Student Handbook, which includes codes of conduct)

K. Health Care, Victim Advocacy, Support and Other Service Providers

Cranbrook Public Safety, (248) 645-3170.

Public Safety staff is available to assist students 24 hours a day, 7 days a week.

Common Ground Mental Health Services, Resource and Crisis Helpline: 800.231.1127.

Common Ground, a community based organization, provides a lifeline for individuals and families in crisis, victims of crime, persons with mental illness, and people trying to cope with critical situations. Common Ground's Victim Assistance Program provides 24-hour access to counselors and advocates for victims of crime, domestic and sexual abuse and workplace violence. Assistance includes on-site advocacy, personal protection order assistance and accompaniment of victims to hospitals, police stations and court rooms. To receive assistance from the Victim's Assistance Program or for more information, call Common Ground's 24-hour Resource and Crisis Helpline at 1-800-231-1127. For more information, visit www.commongroundhelps.org.

**Common Ground's Resource & Crisis Center is located at 1200 N. Telegraph Rd, Bldg #32E, Pontiac, MI 48341*

HAVEN, 24-HR Crisis & Support: 248.334.1274 Toll-Free Crisis Line: 877.922.1274.

Haven is a sexual assault counseling center providing specialized, comprehensive services in the areas of domestic violence and sexual assault. Oakland County's only comprehensive program for victims of domestic violence and sexual assault, Haven provides shelter, counseling and advocacy. Haven's Safe Therapeutic Assault Response Team (START) is a team of forensic nurse examiners and first responders that provides comprehensive forensic exams and compassionate emotional support for victims of sexual assault. *There is no fee for this service.* The Forensic Examiners (FEs) are specially trained to perform medical forensic examinations of adolescent and adult victims of acute sexual assault. They collect evidence from suspects in police custody and work with victims. They are also trained in giving court testimony. FEs assist any victim of sexual assault, 12 years of age or older, who reports the crime within 96 hours of its occurrence. FEs examine both males and females and provide evidence collection from both victims and suspects. For more information, visit www.haven-oakland.org/programs/assault-response.

**Haven's mailing address is 801 Vanguard Drive, Pontiac, MI 48341*

Confidential Counseling:

The Academy has an agreement with Catholic Charities of Southeast Michigan for confidential counseling. Those who require personal counseling are encouraged to make an appointment with a counselor at Royal Oak (248) 548-4044 or Waterford at 248-666-8870. Students should identify themselves as Academy students when making appointments. Students are provided with 6 counseling visits per year at no charge, and those who require additional counseling or services can work with Catholic Charities of Southeast Michigan to identify resources. ***Although the word "Catholic" appears in the title, the agency is not directly associated with any religious group and therapists represent many backgrounds. This agency is very respected in its field in this area.***

In addition, the Academy has contracted with CareConnect for phone-based licensed behavioral health clinicians to assist students in managing mental health issues. Clinicians are available 24 hours a day, 7 days a week, 365 days per year by phone. Every Academy student has access to CareConnect from 9/1/2019 – 8/31/2020. To learn more about CareConnect, visit <https://wellfleetstudent.com/careconnect/> or simply call 1-888-857-5462 for assistance.

ACADEMY RESOURCES FOR PREVENTION AND AWARENESS:

In addition to the information provided by the Title IX / VAWA policy in this report, Cranbrook Academy of Art makes educational and prevention programs available to all students, staff and Artists-in-Residence of the Academy through EduRisk online training, *Learning Launch*. Training modules include information on understanding healthy versus abusive relationships; resources for help and information on preventing sexual assault; information to help students and staff understand respectful relationships and both prevent and report harassing behaviors; and resources for safe and positive options for bystander intervention.

The *Learning Launch* portal of EduRisk is made available to all members of the Art Academy community for on-going learning. The modules may be accessed at any time, and the online training is self-paced. Information required to access the portal is available on the CAA Intranet (password required to access Intranet – all current students are provided with the required password): <https://intranet.cranbrookart.edu/wp-content/uploads/2017/12/CAA-Learning-Launch-Self-Registration-1.pdf>

CAA is committed to providing a safe learning, working, and living environment that is free from violence and unlawful discrimination and harassment. As part of that commitment, CAA encourages all students to complete any of the following online training courses:

- *Healthy Relationships & Dating Violence*
- *Impressions*
- *Intervene*
- *Lasting Choices*
- *Show Some Respect: Prevent Harassment*

References:

The Violence Against Women Reauthorization Act of 2013, (VAWA), also known as the Campus Sexual Violence Elimination Act (Campus SaVE Act).

Title IX of the Education Amendments of 1972, as amended.

Title VII of the Civil Rights Act of 1964, as amended.

October 26, 2010 Dear Colleague Letter on harassment and bullying, issued by the U.S. Department of Education

April 4, 2011 Dear Colleague Letter on sexual violence, issued by the U.S. Department of Education

April 24, 2013 Dear Colleague Letter on Title IX retaliation, issued by the U.S. Department of Education;

April 29, 2014 Questions and Answers on Title IX and Sexual Violence, issued by the U.S. Department of Education.

Title IX Legal Manual, U.S. Department of Justice Civil Rights Division