



OCIC

ANNUAL REPORT

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July 1, 2024 – June 30, 2025

OFFICE OF CIVIL RIGHTS INVESTIGATIONS & COMPLIANCE

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Introduction

Department Overview

The **Office of Civil Rights Investigations and Compliance** (OCIC) provides institutional oversight related to compliance; and administers programs and procedures relating to discrimination, harassment, and retaliation of protected characteristics (i.e., legally protected traits or attributes), sexual misconduct, and ADA/Section 504 compliance. Our programs advise the OHSU community on OHSU policies about protected characteristics, review and investigate reports related to policy violations, offer education, training and other resources, and provide confidential advocacy for employees related to bias, discrimination, harassment, retaliation, and interpersonal violence. To accomplish this mission, OCIC is divided into four unique program areas:

Investigations reviews, investigates, and makes recommendations regarding concerns of prohibited discrimination, harassment, and retaliation based on protected characteristics and activities, including sexual misconduct. The investigations team consists of Confidential Intake Specialists (CIS) and Equal Opportunity Officers (EOOs). CIS screen reports for discriminatory misconduct, refer to supportive resources, and complete initial information gathering interviews, while EOOs conduct investigations into the alleged misconduct, and provide educational conversations when indicated. The Director of Investigations makes the determination of responsibility and recommendations for action.

Prevention and Education (P&E) is responsible for educating OHSU members about prohibited misconduct, reporting pathways, and supportive resources. P&E provides training to educate the OHSU community about relevant policies, to establish and contribute to a culture of respect. P&E also facilitates informal resolutions to OCIC matters, including educational conversations, facilitated dialogues, and responsive departmental trainings.

Confidential Advocacy (CAPE) provides confidential support to employees with concerns of bias, discrimination, harassment, and retaliation, and to employees impacted by interpersonal violence such as stalking, domestic and dating violence, and sexual harassment and assault.

ADA and Section 504 Compliance is responsible for institutional compliance with federal, state, and local law regarding disability rights and accessibility. The ADA and Section 504 Compliance Manager leads institutional strategic work on physical and digital accessibility, oversees accommodation system improvements, and provides consultative services for OHSU members.

Introduction

Report Scope and Purpose

The OCIC Annual Report provides an overview of the Office of Civil Rights Investigations and Compliance (OCIC) operations for the 2025 academic year (AY 2025). This includes matters received and addressed by each team within the office.

This report reflects the volume and types of reports made to OCIC related to sexual violence, bias, and discrimination - generally the issues addressed under the Discrimination, Harassment, and Retaliation (DHR) Policy. These numbers include reports from students, staff, and faculty. Each report of misconduct is unique, and aggregate data, while helpful in illustrating who is reporting and what is being reported, does not provide a complete narrative of the circumstances, impact, and outcomes of the reported misconduct and those involved.

The report also touches on employee engagement in confidential advocacy, the work of the Prevention and Education team, and ADA and Section 504 compliance projects addressed by OCIC.

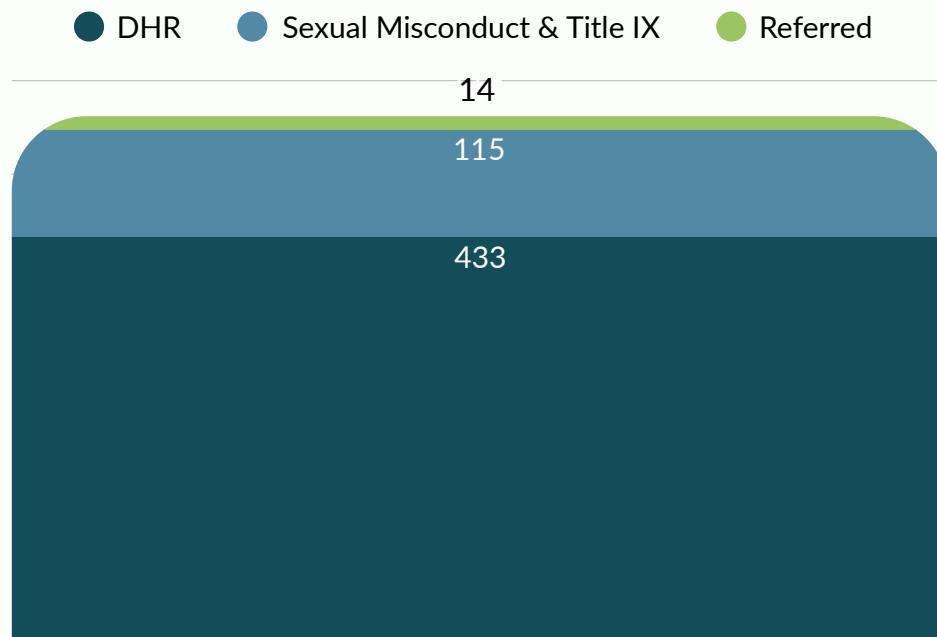
Investigations

Reports to OCIC Investigations Team

The Investigations Team responds to reports of concern related to Discriminatory Misconduct, which includes Discrimination, Harassment, and Retaliation (DHR) based on protected characteristics, as well as sexual misconduct. They assess, refer, and investigate. It is important to note that OCIC is not the office responsible for discipline or sanction as a result of the investigation. When a policy violation has occurred, OCIC informs and works with the appropriate business office, often Human Resources, or the relevant department. The Investigative Team also consults with the Impacted Party to understand their desired outcome based upon the available information, and collaborates on resolutions under the applicable and recommended policy guidelines.

In AY 2025 OCIC received a total of 562 reports by way of the Integrity Helpline and OCIC inboxes. Inboxes are monitored Monday - Friday from 8 a.m. to 5 p.m. Of those 562 reports, 433 were categorized as DHR, while 115 were matters concerning sexual misconduct. The remaining 14 cases were reviewed and assessed to more appropriately be managed by other offices or resources, such as Human Resources or Patient Relations. Note: the following does not reflect HR data and the referrals that Human Resources receives from OCIC are a portion of their caseload.

Figure 1: AY 25 Reports



EthicsPoint and Maxient, September 2025

Investigations

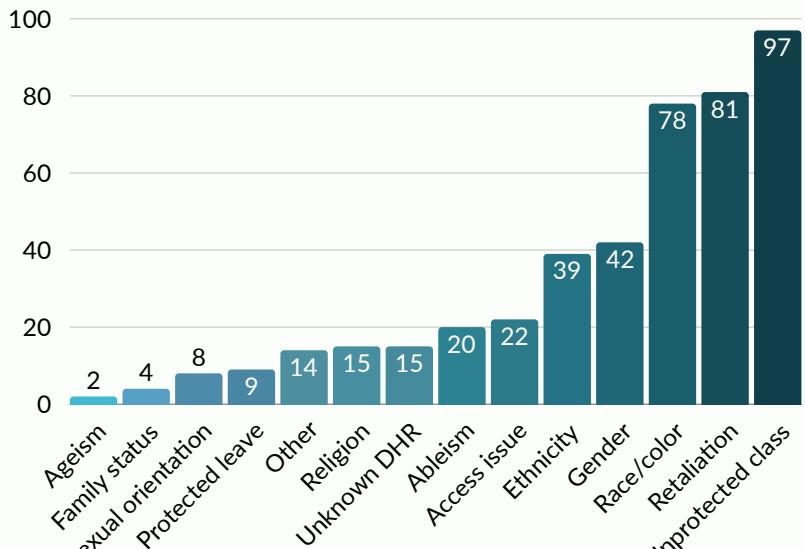
Report Issue Types

Reports to OCIC are categorized into issue types to reflect the nature of the concern. Occasionally reports are assigned more than one issue type.

DHR

Figure 2 details DHR reports made to OCIC in the 2025 academic year. The highest percentage of reports 97 (22%), were determined to not be related to a protected class and were referred to the appropriate office, often Human Resources. Retaliation (81) and discrimination based on race and color (78) were the top two issues reported to OCIC, accumulatively making up 36% of reports.

Figure 2: Discrimination, Harassment, Retaliation

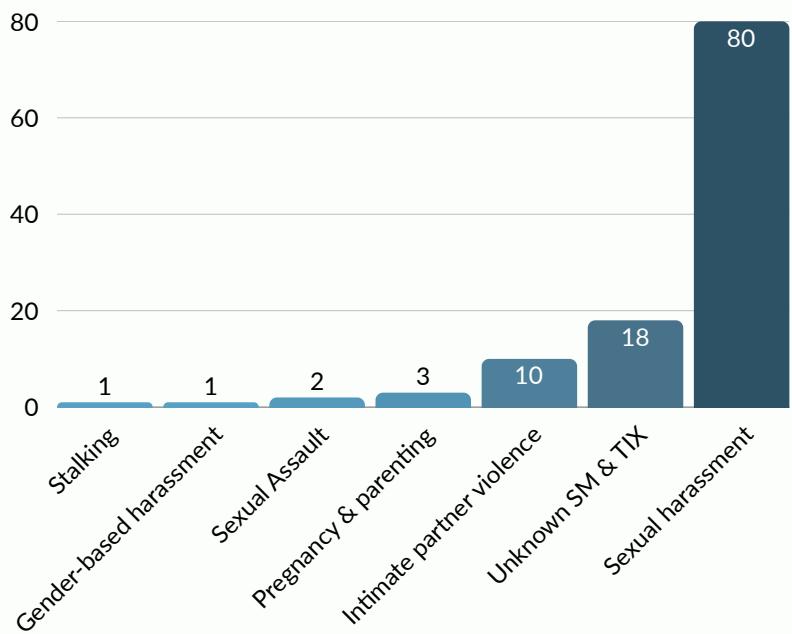


EthicsPoint and Maxient, September 2025

Sexual Misconduct and Title IX

Sexual harassment (80) is the most frequently reported form of sexual misconduct/Title IX concern making up nearly 70% of all reports in AY 2025.

Figure 3: Sexual Misconduct and Title IX



EthicsPoint and Maxient, September 2025

Investigations

Report Participants

In AY 2025, 56% of impacted parties were classified employees. 10% were unclassified employees, 8% were students, and 4% were residents, postdocs, or fellows. The remaining 22% were applicants, contractors, patients, community members and former students/employees. The affiliation distribution aligns with the types of actions reported, many being power-based dynamics between classified staff and unclassified leadership.

Figures 4 and 5 demonstrate a comparison of the overall affiliations within OHSU to the percentages of reports to OCIC that come from each group. Reports to OCIC from unclassified administration are consistent with census size, while classified employees are slightly underrepresented as reflected in figures 4 and 5. This disproportionality can primarily be attributed to external complainant representation. If the 44 applicants, community members, patients, and former employees/students are removed from the data, classified employees make up 64% of impacted parties and unclassified account for 12%, which closely matches OHSU census data.

All parties are offered supportive measures based on the nature of the report and needs of the party. Supportive measures can include, but are not limited to, referral to confidential advocacy, health and wellness resources, and interim work accommodations. OCIC coordinates with leadership and Human Resources to ensure feasibility when recommending interim work accommodations.

Investigations

Figure 4: Responding and Impacted Parties

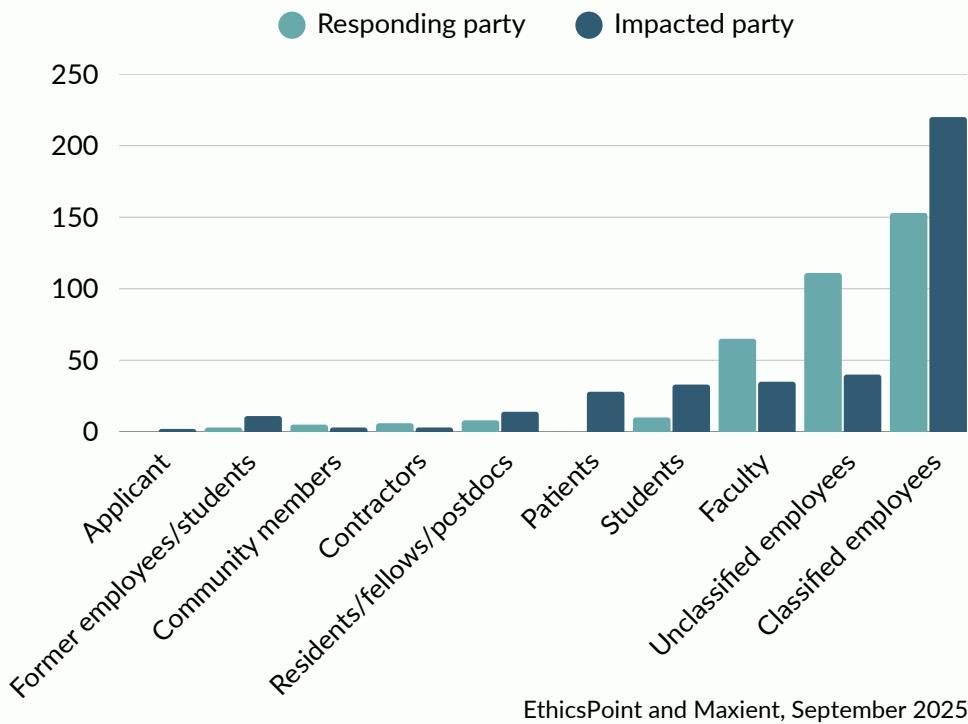
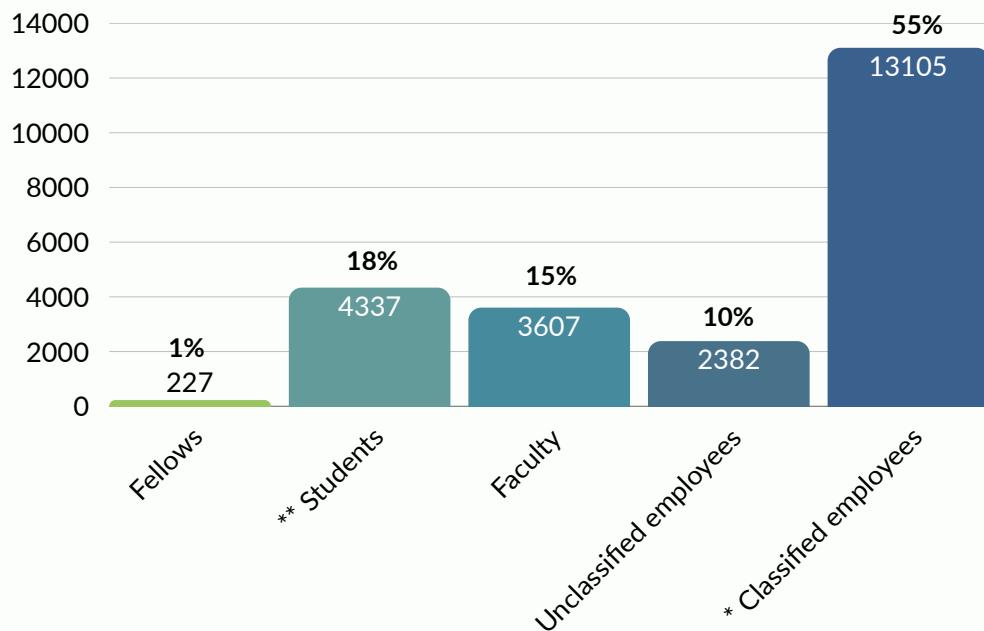


Figure 5: OHSU Member Groups



OHSU Human Resources, April 23, 2025

* Residents and Postdocs are included under employees.

** "Students" includes joint program students enrolled in partner institutions.

Investigations

Report Areas

OCIC data are separated into five areas: Healthcare, School of Medicine, Academics (i.e., School of Dentistry, School of Pharmacy, School of Nursing, and Public Health), Central Services, and Research.

Figure 6 depicts OCIC reports by area, with Healthcare accounting for just over half of all reports in AY 2025, School of Medicine with a quarter of reports, followed by other academic programs/schools.

For comparison, figure 7 represents OHSU census by area. Reports to OCIC generally mirror OHSU census, with the exception of Research and Central Services. Of note, many of the employees in Central Services are involved in the processing of grievances, and it is common in the industry for those areas to underutilize system-based grievance processes.

Figure 6: OCIC Reports by Area

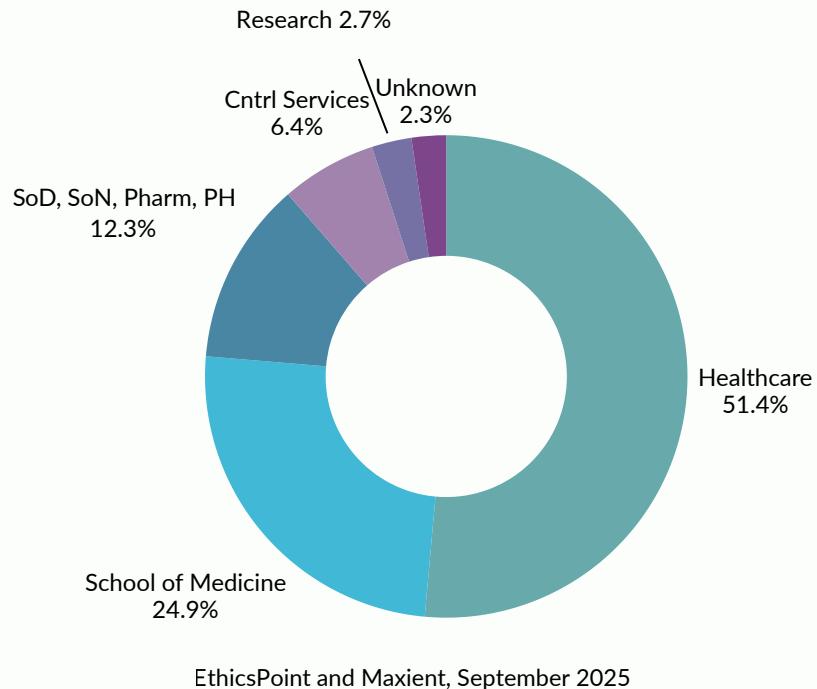
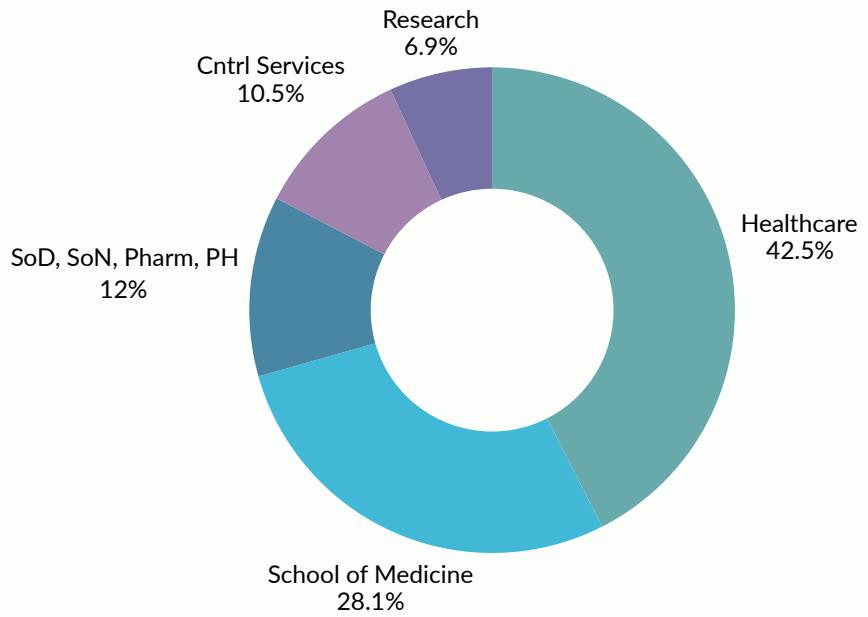


Figure 7: OHSU Census by Area



OHSU Human Resources, April 23, 2025

Investigations

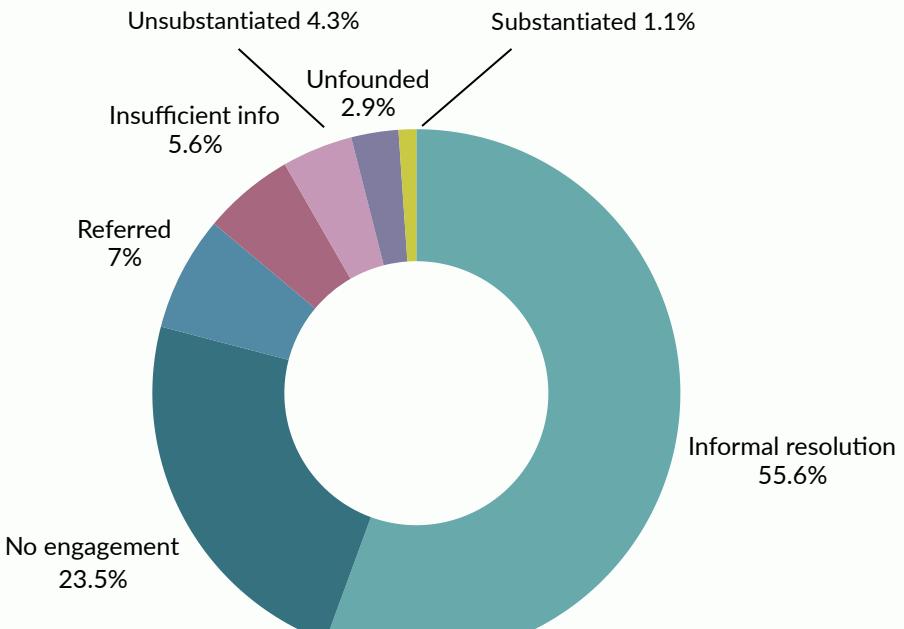
Outcomes

In AY 2025 there were 558 reports resulting in 554 outcomes. This does not include the eight cases that remained open at the close of the academic year. Reports may have more than one outcome, which explains the 554 outcomes for the 550 closed cases. Over half (55.6%) of all reports to OCIC resulted in an informal resolution, such as an educational conversation, facilitated dialogue, or training. All participants, including impacted parties, respondents, and witnesses, receive referrals and other supportive resources to best address their needs. Additionally, many participants continue to receive support from OCIC after a case has been closed as the determination of whether or not a policy has been violated does not often represent the end of a process for the people involved. OCIC continues to support the parties, program leaders, and departments once a case has been closed.

Report Outcomes

- 308 resolved informally
- 130 did not engage
- 39 referred (with formal process)
- 31 insufficient information
- 24 unsubstantiated
- 16 unfounded
- 6 substantiated

Figure 8: Total Outcomes



EthicsPoint and Maxient, September 2025

Prevention & Education

Prevention and Education (P&E) is responsible for ensuring compliance with state and federal laws pertaining to civil rights and Title IX. This is done by creating and implementing preventative and responsive education and measuring the success of those efforts. P&E informs OHSU members about prohibited misconduct, reporting pathways, and supportive resources, while building connections and referring to partners throughout the University. In addition, P&E facilitates informal resolutions for complaints and concerns that come to OCIC and provides customized department trainings and workshops upon department leader request.

DHR Policy and Reporting Trainings

P&E strives to make policy and reporting obligations and processes accessible to OHSU members. To accomplish this goal, P&E launched a presentation campaign in May of 2024 to inform OHSU members of the [Discrimination, Harassment, and Retaliation policy](#). The presentation provides clear information on reporting obligations, what and where to report, how to connect with the Title IX Coordinator, and options for confidential support. The campaign started with a presentation during an All-Leaders meeting followed by an OHSU Now post, and extensive outreach efforts across the institution that included disseminating a reporting [decision-making chart](#) and promotional flyers and business cards.

72 departments, 30 vice presidents, 8 union leaders, and employee resource groups received outreach from P&E to provide trainings on reporting requirements to their departments and teams. In total, P&E provided 149 presentations to 4,306 OHSU Members in AY 2025.

Targeted Trainings and Workshops

P&E created over 30 unique trainings on topics ranging from reporting pathways and support, understanding the OCIC investigations processes, LGBTQIA+ identity and allyship, nonviolent communication techniques, bystander intervention, implicit bias, managing microaggressions in the workplace, mandatory reporting obligations, Integrity Helpline reporting tool, Sexual Assault Awareness Month, overview of OCIC, and more.

Prevention & Education

Required Title IX Trainings

P&E is responsible for bringing OHSU into compliance with federal and state regulations relating to sexual violence and Title IX. Starting in August 2024, Title IX-specific annual trainings were assigned to all employees and students. Approximately 93% of employees completed their required training while student completion rates were 61% and 69% for their two trainings. All employees are also assigned a Harassment Prevention training upon hire/after a position change. This training's completion rate was slightly higher at 94%.

Employees: 92.8% (18,570 employees) completed the required “Building Supportive Communities: Clery Act and Title IX” online training, which takes a close look at the issue of sexual harassment, including sexual assault, relationship violence, and stalking in higher education.

Students: 61%, 1,505 students out of 2,484 assigned, completed the required “Sexual Assault Prevention for Graduate Students,” which supports graduate students' interactions with advisors, faculty members, peers, and undergraduate students (including responding to disclosures).

69.4%, 1,479 students out of 2,125 assigned, completed the required “Title IX Rights and Protections,” which provides students with information about the importance of Title IX and what an institution’s obligations are when a formal complaint is filed. Topics include definition of sexual harassment, Title IX regulations and obligations, and grievance procedures.

Prevention & Education

Informal Resolution

Informal Resolution (IR) engagements are flexible, voluntary, non-punitive, remedies-based engagements with individuals and/or teams. Participants can choose to participate in an IR process after they have engaged with OCIC.

- P&E developed the “Informal Resolution Workflow for OCIC” internal document to demonstrate process flow and address questions when a referral for IR is warranted by the Director of Investigations.
- P&E created an internal referral form to share high level information between OCIC partners and P&E staff. This maintains privacy for the referred individual(s) and focuses on the outcome intended by participation in the IR process.
- IRs are often multisession meetings that can range from guided listening sessions and level-setting around policy expectations, to review of reporting obligations and supportive resources. These sessions often serve to increase awareness of bias and discrimination while building skills in upstander (bystander) intervention and conflict navigation for both managers and team members.
- IR trainings are the result of engagements from departments who sought out additional skill development for their teams. Examples include:
 - Connection and Compassion: To Connect and Gain Empathy, Stop Assumptions
 - Mind the Gap: Age Discrimination and Intergenerational Workplaces
 - Support and Communication: Review of OCIC and Reporting Requirements and Nonviolent Communication Skill Development
 - Leadership Retreat: OCIC Policies, Role Play and Practice with Communication Skills
 - Know Your Rights: Protected Characteristics, OCIC Policies, How to Report, and Being an Active Bystander
 - Not Funny: The Limits of “Humor” at Work (including OCIC overview, what is prohibited, how this relates to workplace humor, and how to disrupt sexist, homophobic, or racist “jokes”)
 - How to Respond to Disclosures and Support Colleagues (SAAM training, included OCIC overview, what is prohibited, reporting requirements)

Confidential Advocacy

The Confidential Advocacy Program for Employees (CAPE) is a confidential office of no record, providing advocacy to OHSU employees who have experienced DHR, and employees impacted by interpersonal violences such as stalking, domestic and dating violence, and sexual harassment and assault.

CAPE began full operations in January of 2025. Data in this report reflect the first six months of operations, January 1st 2025 - June 30th 2025, rather than a full academic year. In that initial six-month period, CAPE served a total of 52 employees and provided 344 client related contacts. The majority of contacts were one on one meetings with clients in person, virtually, or over the phone, while collateral contacts, such as coordinating support with a referral resource, made up 11% of CAPE services, as outlined in figure 9. Figure 10 depicts a breakdown of issue types during the reporting period.

Figure 9: Client Contacts

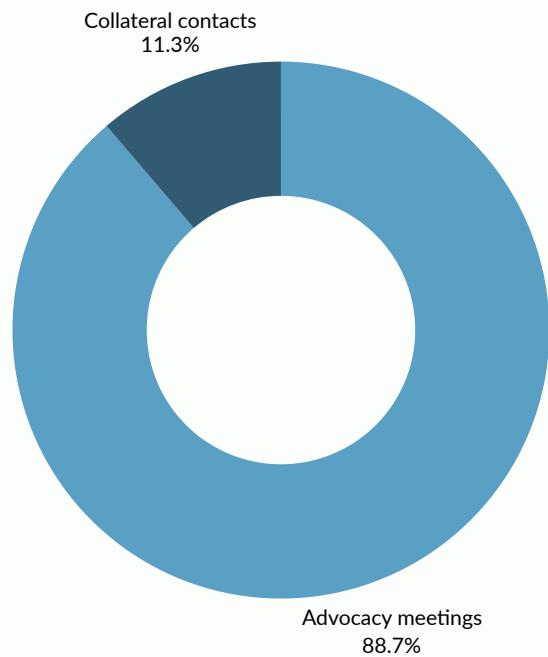
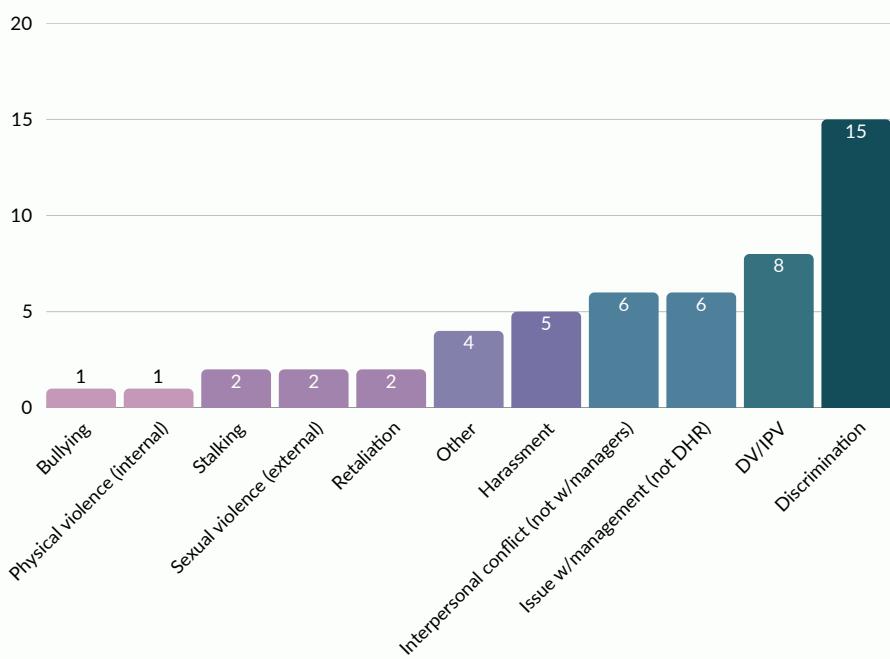


Figure 10: Issue Types



Confidential Advocacy

Services

The most frequent service provided to employees accessing CAPE was emotional support, followed by referrals and policy and procedure navigation. Figure 11 outlines services provided to employees between January 1st and June 30th of 2025, while figure 12 shows the services CAPE referred employees to.

Figure 11: Services

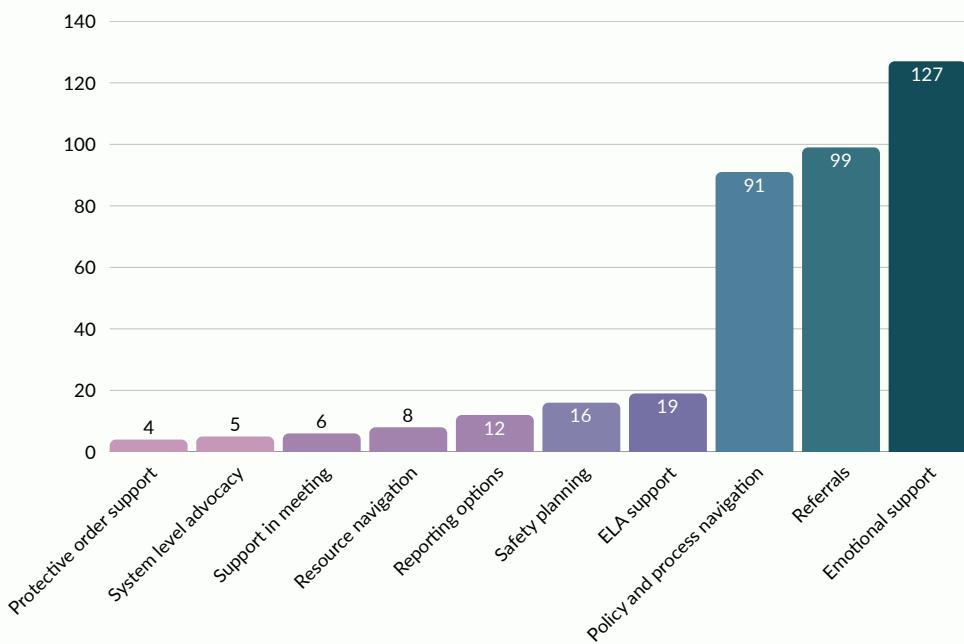
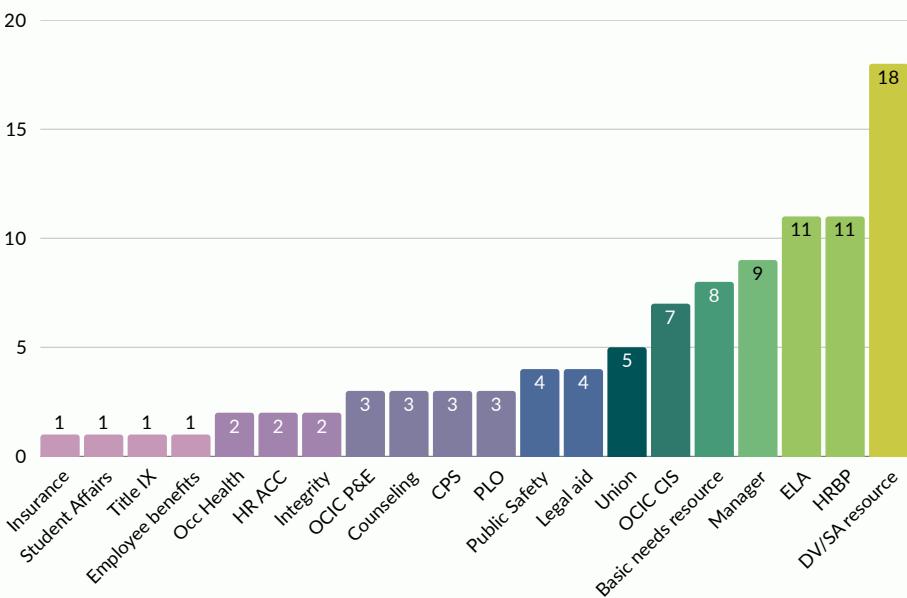


Figure 12: Referrals



ADA and 504 Compliance

The ADA and Section 504 Compliance Manager is responsible for institutional compliance, including adherence to state and federal law around accessibility. The ADA and Section 504 Compliance Manager also provides consultation to the institution and oversees the accommodation appeals process.

Physical Accessibility

- Launched a multi-year ADA architectural assessment of OHSU facilities. Doernbecher Children's Hospital, OHSU Hospital South, and Parking Garages B, C, and F were all evaluated in 2024-2025, with additional facilities to follow in subsequent years. Assessment results will be used to inform an updated self-evaluation and remediation roadmap for OHSU.
- As voted upon by OHSU's [Physical Access Committee](#), directed the allocated funding to improve accessibility in Mackenzie, Baird, and Sam Jackson Hall by installing improved wayfinding signage and automating entry doors to OHSU Anywhere flex use spaces. Read the Committee's [Annual Report](#) for a full overview of its activities in 2024-2025.
- Conducted accessibility walkthroughs or reviews of new facilities at the Crossings Campus, the Richmond Clinic, an adult changing table installed on the 7th floor of Doernbecher Children's Hospital, and proposed designs for the upcoming Doernbecher Children's Hospital Addition.

Digital Accessibility

- In partnership with the Digital Strategy team, led the Digital Accessibility Committee (DAC) in its efforts to coordinate institutional standards and expectations for digital accessibility.
- Conducted educational outreach to institutional partners – Legal, Risk Management, Procurement, Branding & Marketing – on the topic of digital accessibility.
- Advocated for and secured expert legal guidance on compliance with digital accessibility regulations under [ADA Title II and Section 504](#).
- Launched internal [O2 webpage](#) on digital accessibility, including a prioritization worksheet, list of resources, and frequently asked questions.
- Provided expert input on the Digital Strategy's team new [digital accessibility training](#) for OHSU employees responsible for public website content management.

Consultations

- Advised directors, managers, healthcare providers, and other leaders on at least 37 access-related cases, questions, or concerns affecting employees, students, patients, members of the public, and volunteers.

ADA and 504 Compliance

Service Animals

- Led campus partners in creating a new OHSU badge category for service animals, which was piloted in July 2024 and adopted permanently in January 2025.
- Revamped OHSU's policy on animals in healthcare facilities; policy currently in process of getting final approval.
- Revised an OHSU sleep lab policy to align with institutional service animal policy.

Accommodation Systems

- Established a new institutional policy and ancillary procedures for an accommodation appeals process for employees and students.
- Provided expert input to the Office for Student Access (OSA) on the revamp of OHSU's Student Accommodations Handbook and student letter templates.
- Created an Accommodations Compliance training, which was piloted in Spring of 2025 and formally launched Summer of 2025.
- Refreshed OHSU's public webpage on patients with disabilities to provide guidance for patients seeking ADA accommodations.
- Partnered with Patient Relations to explore potential options for better documenting patient accommodations or access requests within Epic.

Inclusive Emergency Planning

- Active member of OHSU's Emergency Planning Advisory Group (EPAG) and the Healthcare Emergency Management Committee, contributing insight on disability-inclusive safety and emergency planning policies, procedures, and protocols.
- Advocated for a Text-to-9-1-1 option within the Department of Public Safety (DPS), leading to a department proposal for a dispatch software upgrade that would improve access to emergency services on OHSU's Portland campuses.
- Revised OHSU's Emergency Action Plan (EAP) template to better meet digital accessibility standards.

Process Improvement

- Launched a new online disability barrier report form and process in February 2025.
- Revamped the public OCIC webpage on ADA compliance in Summer 2024.
- Developed a referral tool for campus partners (Oregon Office on Disability & Health, University Center for Excellence in Developmental Disabilities) to assist them in redirecting external public inquiries to appropriate OHSU resources.

Conclusion

Review and Moving Forward

Review

OCIC made notable strides during the 2025 academic year. The time to close reported cases decreased substantially; in AY 2024 the average time to close was 54 days, while in AY 2025 the average time to close was 36 days. This is a considerable improvement and the overall goal is to have an average that is at or around 60 days. Workflows are more efficient, including initial report assessment and referral to appropriate offices. The ADA program was revitalized and has made significant strides in many important areas around compliance and access across OHSU. The CAPE program was developed, began serving employees, and has made noteworthy contributions to the retention of staff by providing easy-to-access navigation, safety planning, and referral help to employees who are experiencing many complicated factors. The Prevention and Education Team has created a commendable footprint across the organization and is consistently expanding its offerings and support to individuals and departments. Another significant addition in May 2025: OCIC transitioned to a new software system, Maxient, that allows for much closer case management and tracking. Overall, the work is more easily coordinated among the program areas of OCIC.

OCIC in Academic Year 2026

Over the next year, OCIC will be working to increase discriminatory misconduct reporting to the Investigations Team, increase service utilization of P&E and CAPE, and continue the important work of creating improved accessibility for all OHSU members. OCIC reviews annual data and reports of concerns to see if there are any “hotspots” or trends where similar concerns are reported that necessitate more intervention at the departmental level. The Prevention and Education Team will contact those departments to design a training, or series of trainings, for the area in need. OCIC will also continue efforts to integrate process with each school’s conduct system to standardize the student experience across schools. Lastly, an internal quality group will be chartered to conduct post investigation reviews. This will allow for system improvement and strengthening of partnerships across the organization.

Conclusion

The Investigation Team persists in refining its procedures and enhancing communication with partner programs throughout the organization. This effort aims to assist members in comprehending what constitutes a violation of the DHR policy and to facilitate the recommendation of suitable resolutions and outcomes.

Prevention and Education will increase the number of areas to which they are able to provide training and consultation and continue to review the trainings from our office as well as related trainings from other university partners. They will develop an organization wide sexual violence prevention committee (SVPC) with the purpose of promoting institution-wide efforts to prevent sexual violence, harassment, and related misconduct. The committee will have diverse representation across the OHSU enterprise and will be responsible for supporting prevention education, reviewing related data to inform improvement and information dissemination, promoting development opportunities related to sexual violence prevention for faculty, staff, and learners, and providing an annual report to the Title IX Coordinator to summarize its initiatives, impact, and future priorities. A central process for SVPC in AY 2026 will be analyzing the results of the Sexual Misconduct Surveys sent to students and employees.

Additionally, P&E will sunset the Respect at the University module due to significant overlap with other required trainings. This will result in savings of over \$66,000 per year, not including the time and cost associated with taking the module. Increasing outreach to the academic mission will support raising the number of students who complete the Title IX trainings. As part of this effort, P&E will meet with student leadership, outreach to every school directly, and seek partnerships for building greater awareness about these required trainings.

CAPE will continue to socialize its services to the OHSU community, and look to increase engagement. Marketing and educational outreach will be informed by analysis of aggregate user data for any notable service gaps when compared to the overall OHSU population and OCIC reports. CAPE will also launch a consumer feedback survey to analyze areas for process improvement, access barriers, and service satisfaction.

The ADA program expanded its scope to include monitoring and ensuring institutional compliance with Section 504, beginning October 2025. It will continue to advance OHSU compliance with physical and digital accessibility regulations, strengthen educational efforts on access compliance, and continue consultative services for OHSU members.

References

Relevant Policies

[02-01-002 Equal Access for Students with Disabilities](#)

[03-05-045 Conflicting Consensual Relationships](#)

[03-05-048 Discrimination, Harassment, and Retaliation](#)

[03-05-055 Workplace Accommodations](#)

[03-05-058 Accommodation Appeals](#)

[03-05-60 Prohibition on Bullying](#)

[HC-PRM-100-DOC Service Animals, Therapy Assistance Animals, and Pet Policy](#)

Guiding Documents

[OHSU Code of Conduct](#)

[DHR Manual](#)

[Disability Access Barrier Report Form](#)

[Employee Workplace Accommodations Handbook](#)

[Student Accommodations Handbook](#)

[Physical Access Committee Annual Report](#)

References

Program Contacts

Office of Civil Rights Investigations and Compliance (OCIC)

website: ohsu.edu/office-of-civil-rights-investigations-and-compliance

email: ocic@ohsu.edu

phone: 503.494.5148

Title IX

email: titleix@ohsu.edu

phone: 503.494.5148

OCIC Prevention and Education (P&E)

email: prevention@ohsu.edu

phone: 503.494.5148

Confidential Advocacy Program for Employees (CAPE)

website: tinyurl.com/capewebpage

email: cap-e@ohsu.edu

phone: 503.494.0942

ADA and Section 504 Compliance

website: ohsu.edu/office-of-civil-rights-investigations-and-compliance/ada-compliance-and-accessibility

email: keenon@ohsu.edu

Glossary of Terms

Americans with Disabilities Act (ADA): a federal civil rights law prohibiting disability-based discrimination in employment, services provided by state and local governments, public accommodations, and telecommunications.

Complainant: the party reporting Discriminatory Misconduct.

Discrimination: OHSU prohibits discrimination based on protected characteristics recognized by federal and state law. Discrimination is 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 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 purpose.

Discriminatory Misconduct: discrimination, harassment, sexual harassment, sexual misconduct, sexual assault, domestic violence, dating violence, stalking, sexual exploitation, and retaliation prohibited by OHSU policy and Oregon and federal law.

Finding: a conclusion based on the preponderance of the evidence that the alleged conduct did or did not occur (as in a "finding of fact").

Formal Complaint: a written complaint signed by the Complainant or Title IX Coordinator alleging a violation of OHSU's policy on Discriminatory Misconduct and requesting an investigation.

Formal Reports: reports that have come through the institution, the OCIC/Title IX investigative team has been engaged, there has been an evaluation of the necessity of an investigation, and the investigation has taken place if it is determined appropriate. These reports all have a documented resolution, even if that resolution was simply to review and close the matter.

Formal Resolution: the process following a Formal Complaint of conduct that could constitute Discriminatory Misconduct. The Formal Resolution Procedure includes an investigation, determination of responsibility, and sanctions and remedies where appropriate.

Founded: a determination made after a formal investigation finding that the misconduct or violation most likely occurred.

Harassment: unwelcome verbal or physical conduct based on a Protected Characteristic that is so sufficiently severe or pervasive that it substantially interferes, or is likely to substantially interfere, with an individual's employment, education or access to OHSU programs, activities, or opportunities, and would have such an effect on a reasonable person who is in a similarly situated.

Glossary of Terms

Informal Resolution: a flexible process to address reports of conduct that could constitute a violation of OHSU's Discrimination, Harassment, and Retaliation (DHR) Policy. Informal resolution does not include an investigation or a final determination.

In Process: indicates reports that are ongoing and there has not yet been a determination of what resolution will take place. Many of these complainants have received supportive measures or accommodations.

Insufficient Information: OCIC was not able to gather sufficient facts to proceed with any form of resolution due to minimal information being reported.

Intimate Partner Violence (IPV): includes dating violence, domestic violence, and other types of relationship violence. The state of Oregon defines IPV as intentionally or recklessly causing physical, emotional, or physiological harm to a person who is, or has been, involved in a sexual, dating, or other intimate relationship with the Respondent.

Preponderance of the Evidence: is the burden of proof standard used by the OCIC Investigations Team. For a claim to be founded, it has to meet the standard that it is more likely than not to have occurred; in other words there is a greater than 50% chance that the accused individual committed the alleged violation/s.

Protected Activity: any action taken by an employee that is legally safeguarded from employer retaliation. Examples include: engaging in an accommodation or leave process, use of protected leave, reporting misconduct, and participating in an investigatory process.

Protected Characteristics: or protected class, is a personal trait that cannot be used as a reason to discriminate against someone. Examples of protected characteristics identified by federal and Oregon laws include: age, disability, gender, national origin, genetic material, gender identity and expression, military status, pregnancy, race, religion, sex assigned at birth, and sexual orientation.

Report: the disclosure of information regarding conduct that could constitute a violation of the DHR Policy. A report does not constitute a "Formal Complaint" as defined above.

Remedies: supportive solutions provided to a Complainant after a finding of misconduct. These remedies are intended to end the discrimination, prevent it from happening again, and restore equal access to work and education.

Respondent: an individual reported to be the perpetrator of conduct that could constitute a violation of the DHR Policy.

Glossary of Terms

Retaliation: an adverse action taken against an OHSU Member because the individual engaged in a Protected Activity, such as reporting misconduct or taking protected leave. Adverse action means any action that is likely to deter a reasonable person from engaging in a Protected Activity.

Sanctions: disciplinary determinations applied to students and employees found to have violated OHSU's DHR policy. OCIC does not impose sanctions. OCIC may make a recommendation based on a finding. Human Resources and academic programs are responsible for final determinations and subsequent actions.

Section 504 of the Rehabilitation Act: a federal law that prohibits disability-based discrimination in services and programs provided by entities that receive federal financial assistance.

Sexual Assault: any touching of the sexual or other intimate parts of a person or causing a person to touch the sexual or other intimate parts of the actor for the purpose of arousing or gratifying the sexual desire of either party, including sexual intercourse.

Sexual Harassment: unwelcome conduct of a sexual nature that is prohibited under both Title IX and Oregon law. Sexual harassment can include unwelcome sexual advances, requests for sexual favors, or other verbal, nonverbal or physical conduct of a sexual nature where such conduct is so 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.

Sexual Misconduct: an incident of sexual harassment, sexual violence, Intimate Partner Violence, sexual exploitation, stalking, harassment, or violence based on sexual orientation or gender identity or expression, or other gender-based harassment or violence.

Stalking: 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; and/or suffer substantial emotional distress.

Supportive/Interim Measures: are available during an investigatory process and are temporary, non-punitive, individualized services provided to parties involved in a complaint to ensure equal access to education and employment, such as safety and academic accommodations, and work site and schedule adjustments.

Unfounded: a determination made after a formal investigation finding that the alleged misconduct or violation most likely did not occur, based on the preponderance of the evidence standard.

Unsubstantiated: a determination made after a formal investigation, resulting in insufficient evidence to conclude that a policy violation was more likely than not to have occurred, based on the preponderance of the evidence standard. In other words, the institution could not reach a conclusion of responsibility based on the evidence presented.