

2023 Public Description of Work for Action Collaborative on Preventing Sexual Harassment in Higher Education

University of Miami

Review of Existing University Policies and Procedures to Ensure Alignment with the Health and Human Services' Office of Civil Rights

Relevant Rubric Area(s):

1. Response: Improved Policies
2. Organizational Change: Leveraging the strengths of distinct stakeholder groups and creating partnerships between them

Description of Work:

The University of Miami (University) is a private research university in Miami Dade County. It has a Medical School and Health System that serves university community members as well as general community members alike.

To ensure compliance, but also to ensure highest standards of service for students, faculty, staff, and patients alike, the University constantly monitors guidance from the Department of Education (DOE), Department of Health and Human Services (HHS), and Department of Labor (DOL), among other federal entities that regulate important aspects of University life.

Through this monitoring practice, in June 2022, the University learned of a [Voluntary Resolution Agreement between HHS and the University of Southern California](#) to settle Title IX Discrimination Complaints. Back in 2019, HHS had reached a [similar agreement with Michigan State University](#). HHS Voluntary resolution agreement is a settlement agreement signed by HHS and a covered entity. While these settlements are not binding beyond their specific scope, they do provide important insight as to the expectations of the HHS, as well as insight into what some best practices might be.

While Title IX teams often focus only on guidance from DOE, an idea was born to review these agreements and coordinate an internal review to better understand our community's position *vis a vis* the HHS standards, with the dual purpose of ensuring compliance and ensuring the best experience of university members and patrons.

The project included three (3) phases: (1) identification of relevant, key campus partners to engage in working group and liaison with specific areas of service, (2) review of policies, practices, and services currently offered by the University *vis a vis* voluntary resolution agreements between other higher education institutions and HHS' Office of Civil Rights (OCR), and (3) identifying areas of opportunity and referring those to the appropriate departments for further discussions with leadership and practitioners about future implementation.

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Identification of Campus Partners

The identification of campus partners phase included identifying individuals from different groups within the organization that work on matters related to Title IX, risk management, patient experience, and direct service providers within the University (both physicians at University hospitals and employee/ student clinics). From these groups, representatives were identified to meet in a working group.

Review of Voluntary Agreements and identification of Policies, Practices, and Services

Once appropriate folks had been identified, those individuals engaged in a review of the voluntary agreements, looking to identify items which were known to already be the University's practice. As those were checked off as done, others were identified as unknown. Group members were assigned to do additional outreach to gain a better understanding of how and to what extent some of the other items were the current practice within our system. This included taking a deep dive to look into policy versus practice and included close consultation within different units of care.

Referrals for further action, when necessary

Having completed further investigation on items which were unknown during the initial review, the group finally identified future action to be taken by specific groups to consider the development of guidelines, processes, and policies to mirror the best practices and standards outlined on the Voluntary Agreements where those were not already the standard within our system. This phase of the project is ongoing.

Website for further information (if applicable): www.miami.edu/TitleIX

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