RIT

Compliance and Ethics

Office of Compliance and Ethics Annual Report

Fiscal Year 2024

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Office of Compliance and Ethics Annual Report
Fiscal Year 2024

Office of Compliance and Ethics

A Message from the Associate Vice President

The Office of Compliance and Ethics (OCE) proudly leads RIT's Compliance and Ethics Program, dedicated to fostering a university culture that champions ethical conduct and a steadfast commitment to compliance with all applicable laws, regulations, and policies. Our collaborative approach involves working closely with the entire RIT community to uphold a culture of integrity. By managing key compliance areas, we help the university navigate complex laws and standards, integrating essential processes, responsible individuals, and necessary resources.

This report provides a comprehensive overview of our office and the Program's key components, including information on focus areas and accomplishments in fiscal year 2024. We've included QR codes and links for easy access to more detailed information, and we encourage the RIT community to reach out to us with any questions or requests for training on our focus areas. Our Program is a vital part of RIT's dedication to maintaining high ethical standards and compliance with both internal policies and external regulations.

Our continuous improvement initiatives ensure that we remain transparent, effective, and responsive to the evolving needs of the university. As we continue to navigate the evolving landscape of higher education, several key compliance areas remain focal points for OCE. Conflicts of interest and commitment are increasingly scrutinized to maintain academic integrity and trust, particularly in research. Investigations into misconduct and regulatory breaches are intensifying, emphasizing the importance of transparency and accountability. Sex and gender-based harassment and discrimination, including Title IX compliance, also remains a priority, with institutions adapting to evolving regulations to address sex discrimination and sexual misconduct. Finally, the complexities of immigration laws for international students and staff highlight the need for adaptability in response to changing workforce dynamics.

We deeply appreciate the active engagement of the RIT community in our efforts. Together, we can further the OCE vision: to create a sustainable culture committed to the highest standards of ethics, transparency, accountability, and respect. Feel free to reach out to us anytime. We're here to support you!

Erika J. Duthiers

Associate Vice President,
Compliance and Ethics
Deputy General Counsel

Office of Compliance and Ethics Team
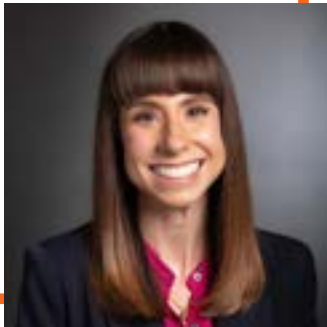
Christine Borrelli Smith

Assistant Director of Compliance and Ethics

Lori Sykes

Compliance and Ethics Manager

Donna Sandlin

Director of Policies and Compliance

Stacey Clements

Dining Svc Safety/Compl/ Training Manager

Hinna Upal

Senior Manager of Compliance Investigations and Associate Counsel

Kat Reid

Senior Staff Specialist

Title IX

Stacy DeRooy

Executive Director of Title IX and Clery Compliance

Darci Lane

Assistant Director of Title IX and Clery Compliance

Cathy Farina

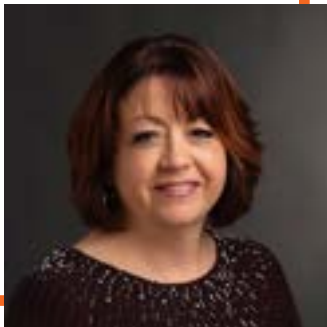Title IX Investigator/ Compliance Coordinator

Deputy Title IX Coordinators

Amy Stornello

NTID Deputy Title IX Coordinator

Jeffrey Siegel

Associate Director Athletics

Lana Verschage

Director of Diversity Initiatives and Women in Computing

Compliance and Ethics Program

Notable Celebrations and Accomplishments

OCE had many reasons to celebrate in 2024, including the numerous personal accomplishments of the OCE team.

Cathy Farina, Title IX Investigator/Compliance Coordinator, completed a week-long, intensive training, through the **Association of Workplace Investigators** (AWI) in Denver, Colorado. The training focused on mitigating bias, conducting investigations, interviewing parties, and report writing, and culminated in a final assessment and certification as an Association of Workplace Investigators Certificate Holder (AWI-CH).

Christine Borrelli Smith, Assistant Director of Compliance and Ethics, successfully completed the prerequisites and passed the exam to become a **Certified Compliance and Ethics Professional** (CCEP) through the **Compliance Certification Board** (CCB).

Donna Sandlin, Director of Policies and Compliance, continued her 12+ year service as volunteer advocate, providing support to students as they navigate throughout the RIT Student Conduct Process.

Erika Duthiers, Associate Vice President of Compliance and Ethics and Deputy General Counsel, was awarded **Attorney of the Year for In-House Counsel** by **Rochester Business Journal** on Nov. 4. The award, in partnership with The Daily Record, honors lawyers advancing the profession and strengthening the community.

OCE celebrated the following milestone years of service: **Stacey Clements** (25 years), **Darci Lane** (15 years), and **Cathy Farina** (5 years).

In addition, the OCE team goes above and beyond through involvement with RIT community activities that foster an environment where collaboration and excellence flourish. For example, the Title IX team coordinated with RIT's 365 program to deliver education to over 400 incoming students. The sessions were conducted by **Stacy DeRooy**, Executive Director of Title IX and Clery Compliance, and **Darci Lane**, Assistant Director of Title IX and Clery Compliance, **Cathy Farina**, Title IX Investigator/ Compliance Coordinator, **Amy Stornello**, NTID Deputy Title IX Coordinator, and **Zoe Paris**, OCE's **RESTORE** partner

Donna Sandlin served as a member of the Middle State Accreditation Committee (MSCHE), gathering, assessing, and making recommendations regarding RIT's compliance with government regulations and MSCHE policies.

Donna Sandlin and **Stacey Clements** collaborated with RIT Housing and Dining and the Disability Services Office to enhance the accommodation process for Auxiliary Services. They also partnered across campus to improve the processes for accommodating emotional support animals and managing allergens on campus.

OCE celebrates our team's collective **140+ years** of service to RIT and dedication to the RIT community.
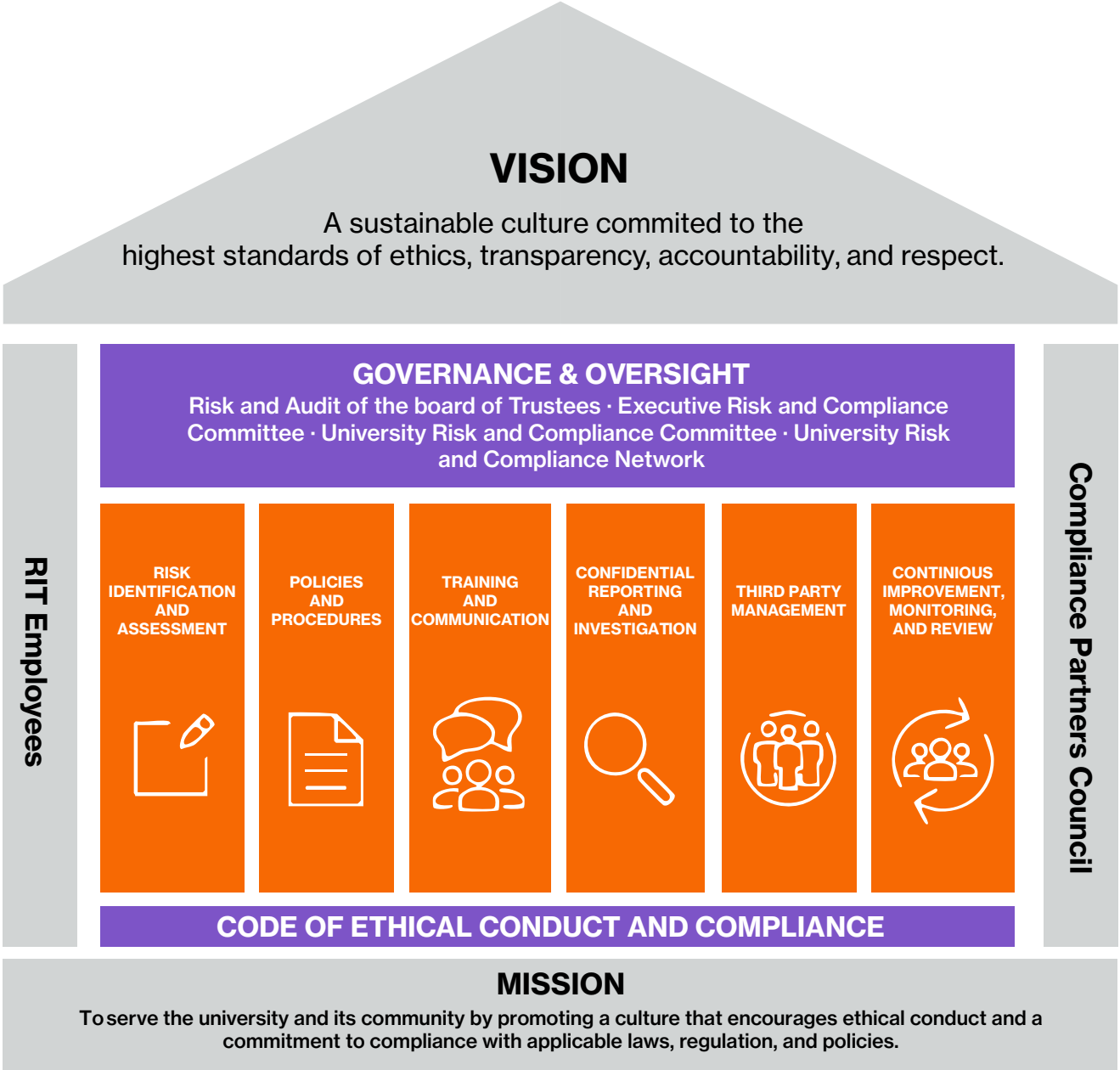
Compliance and Ethics Program Overview

The **Compliance Policy and Code of Ethical Conduct** (the Code) forms the foundation of the Compliance and Ethics Program. It applies to all members of the RIT Community when representing the university, utilizing its resources, on RIT property, or attending RIT functions.

The Code along with the university's Core Values, Honor Code, Diversity Statement, and Commitment to Environmental Sustainability, reinforces the principle that all members of the RIT community, including the Board of Trustees and its officers, have a responsibility to ensure that RIT conducts its business and pursues its mission ethically, legally, and with integrity.

An effective compliance program relies on the commitment of senior leadership and management to champion the highest ethical standards. The governance and oversight structure of RIT's program demonstrates a strong commitment from the President, Board, and senior and operational leadership to ensure the university complies with applicable laws and regulations, and that the university operates with the utmost integrity and ethics.

VISION

A sustainable culture commited to the highest standards of ethics, transparency, accountability, and respect.

RIT Employees

GOVERNANCE & OVERSIGHT
Risk and Audit of the board of Trustees · Executive Risk and Compliance Committee · University Risk and Compliance Committee · University Risk and Compliance Network

RISK IDENTIFICATION AND ASSESSMENT	POLICIES AND PROCEDURES	TRAINING AND COMMUNICATION	CONFIDENTIAL REPORTING AND INVESTIGATION	THIRD PARTY MANAGEMENT	CONTINIOUS IMPROVEMENT, MONITORING, AND REVIEW

CODE OF ETHICAL CONDUCT AND COMPLIANCE

Compliance Partners Council

MISSION
To serve the university and its community by promoting a culture that encourages ethical conduct and a commitment to compliance with applicable laws, regulation, and policies.

Compliance and Ethics Program

OCE manages the university's Compliance and Ethics Program, reporting regularly to the Senior Vice President of Finance and Administration as well as the Board of Trustees Risk and Audit Committee. By supporting university-wide compliance and ethics activities and initiatives and overseeing enterprise risk, OCE promotes RIT's commitment to compliance and ethics.

Three (3) internal risk and compliance committees guide and support the Program's implementation and operation. For further details on governance and oversight, see the **Compliance Program Roles and Responsibilities**.

Office of Compliance and Ethics		
• Reports to the Senior VP of Finance and Administration • Promotes RIT's commitment to compliance and ethics • Prepares program updates for the Risk and Audit Committee • Manages ERM Program and Ethics Program • Supports university-wide compliance and ethics activities	**Board of Trustees**	• Risk and Audit Committee **reviews** Office of Compliance and Ethics activities • Oversight Board Committees **review** risk mitigation/treatment plan • Risk and Audit Committee **approves** Institute Risk Map
	Executive Risk and Compliance Network (ERCC)	• **Directs** policy **and sets** "Tone at the Top" • **Monitors** progress in key risk and compliance areas • **Provides** updates and recommendation to the Board of Trustees • **Recommends** allocation of resources • **Oversees** creation and implementation of Institute Risk Map
	University Risk and Compliance Committee (URCC)	• **Identifies and monitors** progress in key risk and compliance areas • **Supports** coordination of risk and compliance activities • **Reviews** updates, recent developments, and best practices
	University Risk and Compliance Network (URCN)	• **Serves** as subject matter experts on key risk and compliance areas • **Provides** information on risk and compliance activities for their area to the URCC and OCE as needed

In addition, OCE created a Compliance Partners Council, which includes individuals within the RIT Community with roles that focus on compliance requirements. The Council aims to improve collaboration and break down silos, discuss trends and critical topics in higher education, and share practical information that may impact operational areas on campus. OCE also partners with compliance and legal counterparts from universities throughout the United States for monthly benchmarking on compliance efforts and to share best practices.

For more details on OCE's Compliance and Ethics Program and available resources, please see our **OCE Compliance Program webpage**.

OCE Focus Areas

Conflict of Interest and Commitment

OCE is committed to ensuring that all university activities and decisions are conducted with the highest level of integrity and transparency, and free from conflicts of interests and commitment. Our program is designed to promote ethical conduct and support objective decision-making, ensuring that the university's best interests and its community are always prioritized.

In addition, OCE partners with Office of the Vice President of Research to develop management plans for principal investigators working on research projects to ensure integrity and objectivity of the research.

During FY 2024, OCE managed COI disclosure compliance, maintaining an annual disclosure completion rate of **99%**.

In that time frame **820 employees (24%) disclosed information that required further review** to determine if any potential, real, or perceived conflict existed.

- **230** require **active management plans**
- **47%** of active management plans are for researchers

The most **common types of conflicts** disclosed by employees in FY24 included:

- Relatives **employed by** or **enrolled** at RIT (120)
- **Outside activities**, including other employment, consulting companies, or board membership (105)

> **3,800 employees completed annual disclosures in FY24, a 99% completion rate.**

For more details on OCE's Conflict of Interest and Commitment, please see our **Conflict of Interest webpage**.

Enterprise Risk Management

RIT conducts an annual enterprise-wide risk assessment, which includes a review of all legal and compliance risks, with a goal to identify, analyze, and prioritize top risks for the university. Top enterprise risks require the attention of senior leadership and documented risk response plans to ensure proper management. This process requires collaboration with and input from a wide variety of individuals on campus, including subject matter experts, operational management, senior leadership, and the Board of Trustees.

The Enterprise Risk Management (ERM) Program at RIT helps the university achieve its goals by identifying and addressing risks and promoting a culture of risk awareness across the campus. The ERM Program is overseen by the Office of Compliance and Ethics (OCE).

The ERM Program operates on a multi-year cycle, with comprehensive risk assessments conducted every three (3) years. In between, brief surveys track new and evolving risks. The 2024 Risk Assessment Survey reviewed top risks from 2023 and included newly identified risks and revisions to existing risks.

RIT's internal Risk and Compliance Committees, representing all university divisions, collaborate to create a comprehensive Risk Register, which includes **351 total risks**. The Committees scored all risks, confirmed the highest scored risks, and recommended seven (7) top enterprise risks for the 2024 Institute Risk Map.

The ERM process is continuously reviewed and updated to enhance the ERM Program's maturity. Recent changes include the development of an interactive **ERM Dashboard,** which is accessible to the RIT community from OCE's website and provides transparency on the university's risk profile for fiscal years 2022 through 2024. OCE also further defined and separated the roles of Primary Risk Owner(s) and Critical Partners and revised the Risk Response Summary Progress Report template based on input from risk partners.

For more details on the ERM Program and our 2024 Top Enterprise Risks and Institute Risk Map, please see the **2024 Annual Enterprise Risk Management Report** and interactive ERM Dashboard, which are available on the OCE website and accessible to RIT Community members. The dashboard provides more transparency of ERM challenges and improves trending of top risks year over year.

For more details on OCE's Enterprise Risk Management, please see our **ERM webpage**.

FY24 Top Enterprise Risks

- Cybersecurity and Data Protection
- Enrollment
- Facilities and Infrastructure
- Modernization
- Physical Safety and Security
- Recruiting and Retention
- Sex and Gender-Based Harassment and Discrimination
- Student Health and Well-Being

Export Control

OCE oversees RIT's general export control program. We are committed to adhering to all U.S. export control laws and regulations, including the Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR), and sanctions administered by the Office of Foreign Assets Control (OFAC). OCE provides counsel to the university community regarding export control, managers training, and obtains licenses on behalf of the university, as necessary.

In addition, OCE works closely with the Office of the Vice President of Research, **Sponsored Research Services**, to ensure compliance with all export control requirements. All sponsored research projects are reviewed for compliance, and technology control plans are put in place to prevent unauthorized access by foreign nationals to export controlled technology, technical data, materials, software or equipment.

For more details on OCE's Export Control, please see our **Export Control webpage**.

Third Party Screening:

OCE oversees Restricted Party Screening (RPS), which ensures RIT does not engage with individuals, companies, or organizations that are on U.S. government lists of restricted or denied parties. In FY24, our department conducted 1,202 screening alerts to ensure RIT adheres to federal laws when engaging in international activities.

Labor and Employment

OCE partners with Human Resources and other campus partners to ensure RIT is ethical and compliant in its labor and employment practices, by administering related processes and programs and serving as a resource for the RIT community.

Labor and Employment compliance-related efforts that fall within the OCE umbrella include administering RIT's E-Verify program, processing and retaining work authorization for foreign national employees (immigration), overseeing the medical and disability accommodation request process, enrolling employees in the NY DMV License Event Notification Service (LENS) program, and processing unemployment claims. OCE also compiles RIT's annual Affirmative Action Plan.

RIT's International Community:

RIT is a diverse community, and OCE oversees the processes for obtaining and retaining work authorization for our community's international employees. In FY24, OCE provided ongoing management and monitoring of RIT's international employees. RIT's international emplooyee community hails from 42 different countries.

Employee Accommodations

In FY24, OCE received a total of **81** employee accommodation requests.

Employment Groups Requesting Accommodations

- 52 Staff
- 19 Faculty
- 4 Adjunct Faculty
- 5 Student Worker
- 1 Job Applicant

Campus Areas Where Requestors Work

- 52 Academic Affairs
- 19 Finance & Administration
- 8 Student Affairs
- 2 Other

Accommodation Request Status

64 Approved

11 Closed for Other Reasons

6 Denied
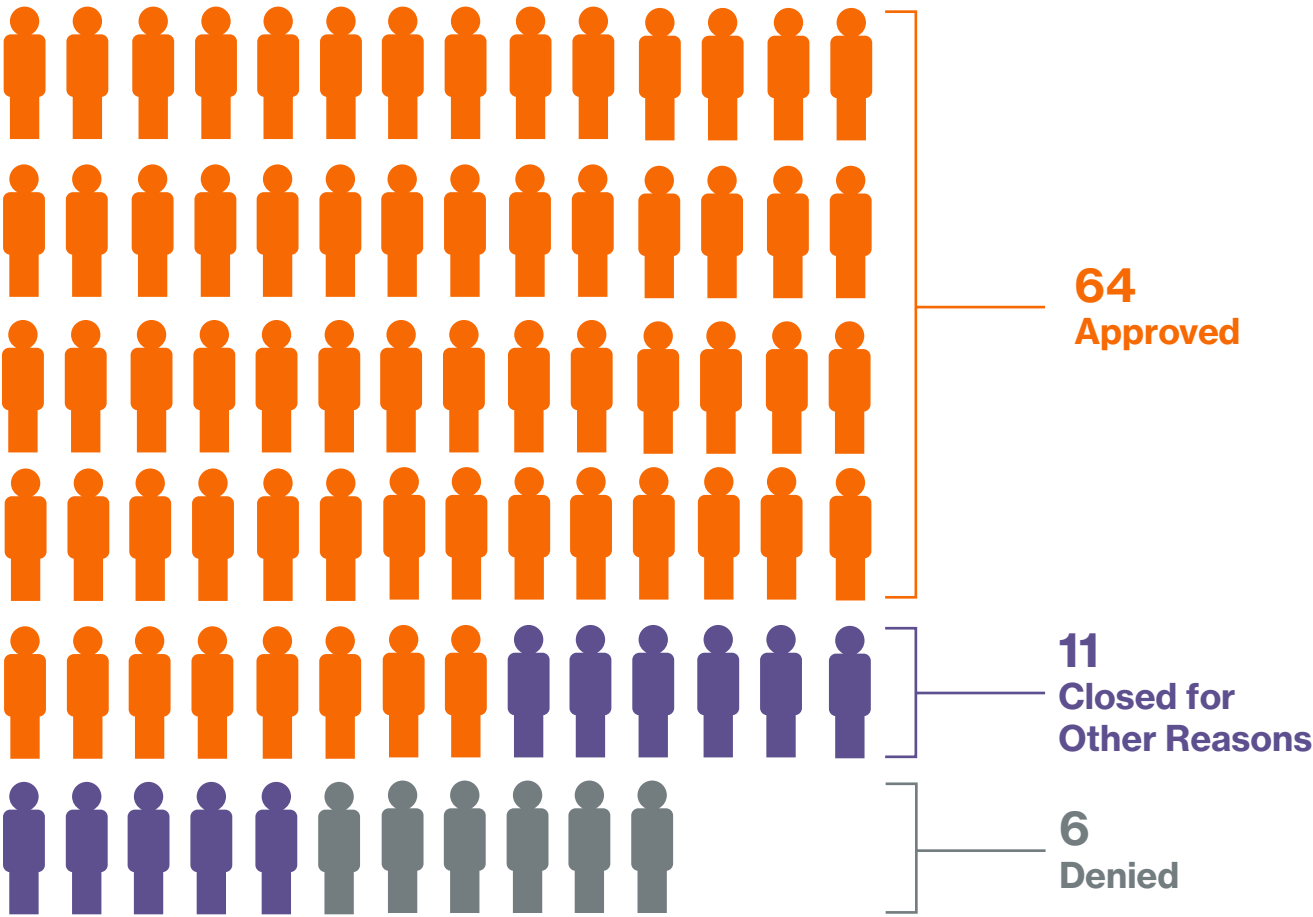
Remote Work Accommodation Requests

In FY2024, **30%** of all accommodation requests included some aspect of remote work. This is a trend identified in FY24.

Additional information and details are available on the OCE **Labor and Employment webpage**.

Mandatory Training and Education

OCE oversees RIT's Mandatory Training for all faculty and staff, ensuring compliance to **C25.0 Policy on Mandatory Training**, which includes continual monitoring and follow-up of employee mandatory training compliance.

OCE manages the mandatory training of all regular employees, adjuncts, and student employees in areas such as Discrimination and Harassment (including Title IX), Cybersecurity, Campus Security Authority, and Conflict of Interest.

In FY24, RIT employees completed approximately **13,950 mandatory training courses** and maintained **a Compliance rate of 98% collectively,** which is an increase from the compliance rate of 95% in FY2023. OCE also manages and updates courses for role-specific-required trainings.

For more details on Mandatory Training and Education, please see our **Mandatory Training and Education Webpage**.


Investigations and Reviews
Discrimination, Harassment, and Retaliation

OCE investigates complaints involving RIT employees relating to alleged discrimination, harassment, retaliation, and certain policy violations. In-scope complaints under the purview of OCE include complaints of discrimination or harassment based on race, color, or creed; religion; national origin or citizenship status; culture (including Deaf culture); sex; pregnancy; age; marital status; sexual orientation; gender identity or expression; disability; and veteran status. Other areas of investigation include conflicts of interest, export control, and retaliation for engaging in protected activity.

For more detail on what categories of complaints are in scope for OCE investigation, please see the OCE **Administrative Policy for Reviewing and Investigating Reports of Misconduct or Violations of Policy.**

Number of Unique Cases Over Time

- In scope
- Out of scope

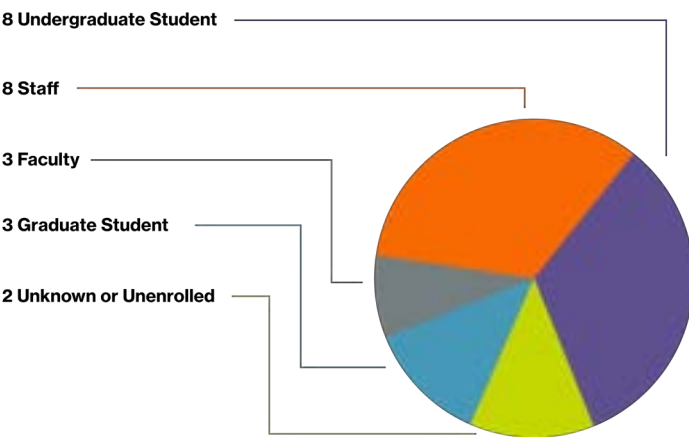|	In scope	Out of scope
FY22	10	30
FY23	45	21
FY24	37	21
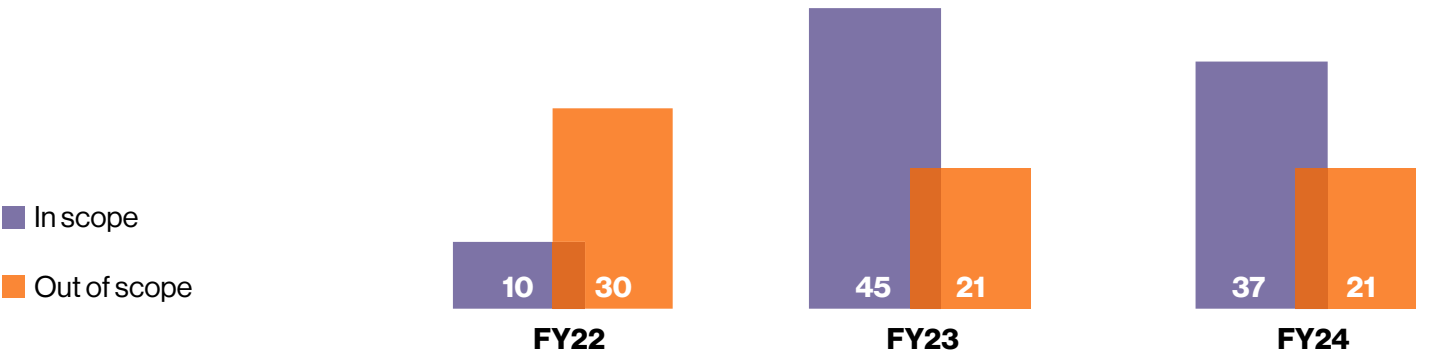
Fifty-two percent (52%) of the 21 complainants were students (both undergraduate and graduate) reporting alleged misconduct by employees (both faculty and staff), which is consistent with data from FY23.

Allegations of race or ethnicity-based discrimination accounted for 32% of complaints received in FY24, up from 22% of complaints received in FY23.

Allegations of disability-based discrimination comprised 26% of the complaints received in FY24, which reflects a 4% increase over the previous year.

Starting in FY24, complaints based on discrimination due to hearing status were tracked separately and accounted for roughly 20% of all in-scope complaints.

Complainants

During FY24, OCE received a total of 21 in-scope cases, students against employees accounted for 52% of the complaints.

Complainant Demographics (In scope)

- 8 Undergraduate Student
- 8 Staff
- 3 Faculty
- 3 Graduate Student
- 2 Unknown or Unenrolled

Respondents

In 43% of in-scope cases investigated, the respondent was a staff member. Faculty members (including full-time, part-time, and visiting) accounted for 33% of respondents.

Respondent Demographics (In scope)

- 9 Staff
- 7 Faculty
- 5 Unknown
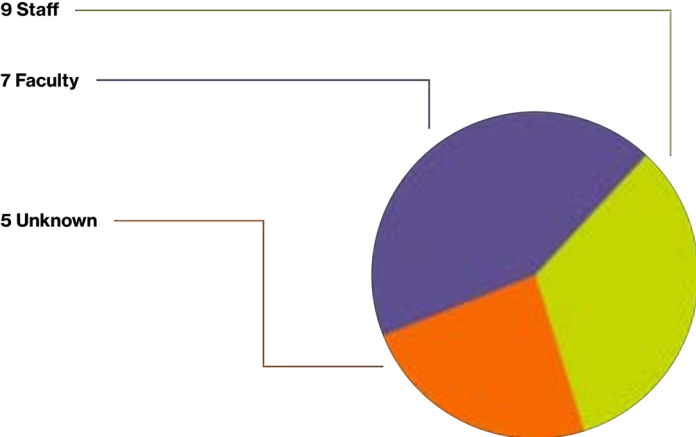
Nature of Allegations

79% of all in-scope complaints investigated by OCE reported alleged race or ethnicity-based, disability, or hearing-status related discrimination.

Each in-scope case may contain more than one allegation of misconduct. For purposes of this data, each allegation is counted separately. The 21 in-scope cases included a total of 34 individual complaints.

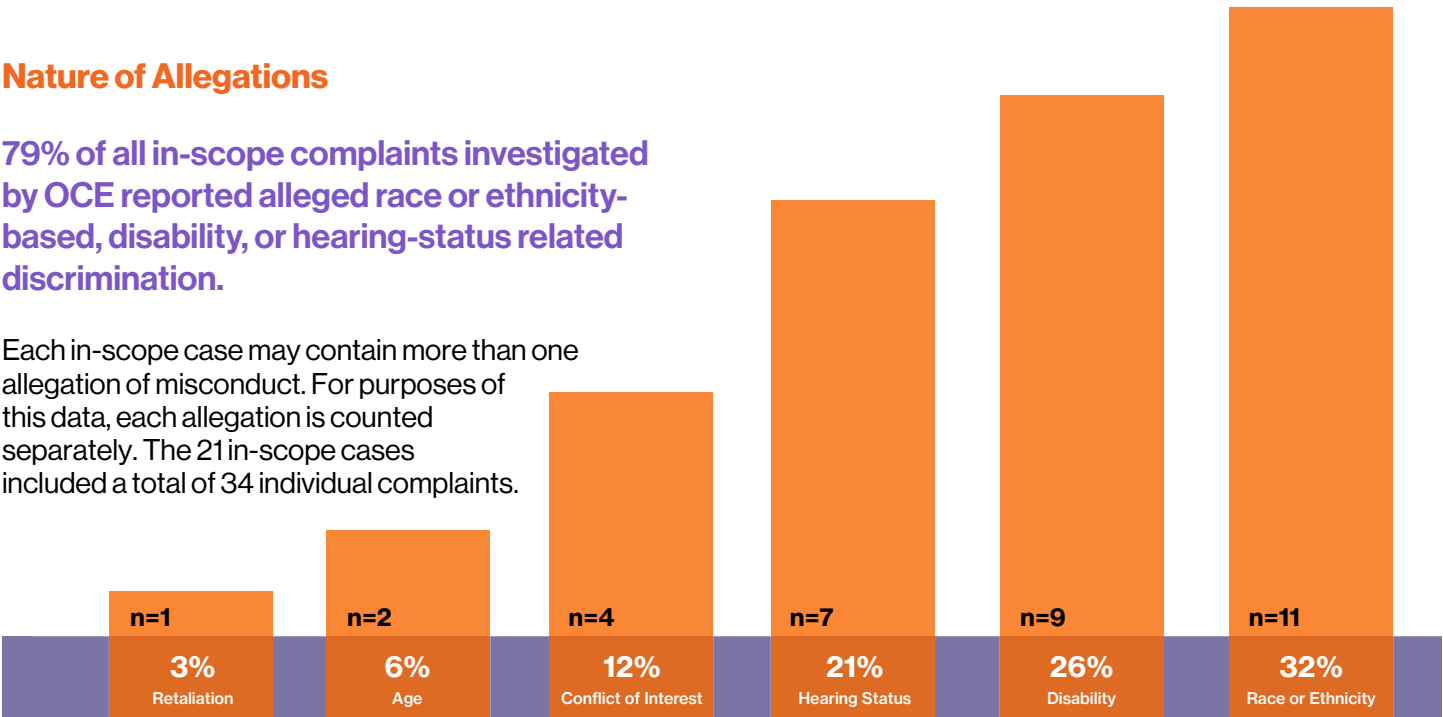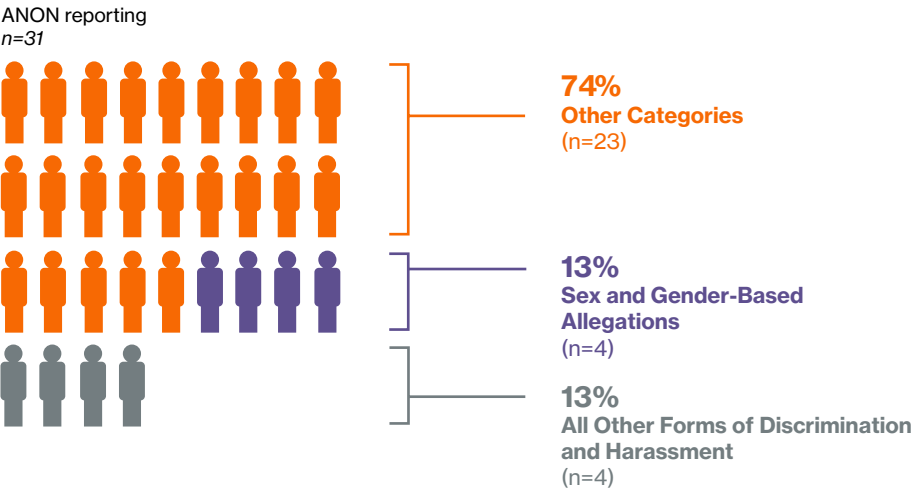| n=1	n=2	n=4	n=7	n=9	n=11
3% Retaliation	**6%** Age	**12%** Conflict of Interest	**21%** Hearing Status	**26%** Disability	**32%** Race or Ethnicity

Summary of Ethics and Compliance Hotline Reports

OCE also collects data on anonymous reporting through **EthicsPoint**, an anonymous reporting option for the RIT community. In FY24, RIT received 31 anonymous complaints, eight (8) reports, or 26%, of which alleged harassment and discrimination.

Fifty percent (50%) of the harassment and discrimination reports through the Ethics and Compliance Hotline involved sex and gender-based allegations.

Both percentages are consistent with FY23 numbers.

Harassment & Discrimination Complaints Received Through Hotline

ANON reporting
n=31

74%
Other Categories
(n=23)

13%
Sex and Gender-Based Allegations
(n=4)

13%
All Other Forms of Discrimination and Harassment
(n=4)

Additional data for OCE investigations is available on the OCE **Data Analytics and Reports Webpage**.

Sex and Gender-Based Harassment and Discrimination
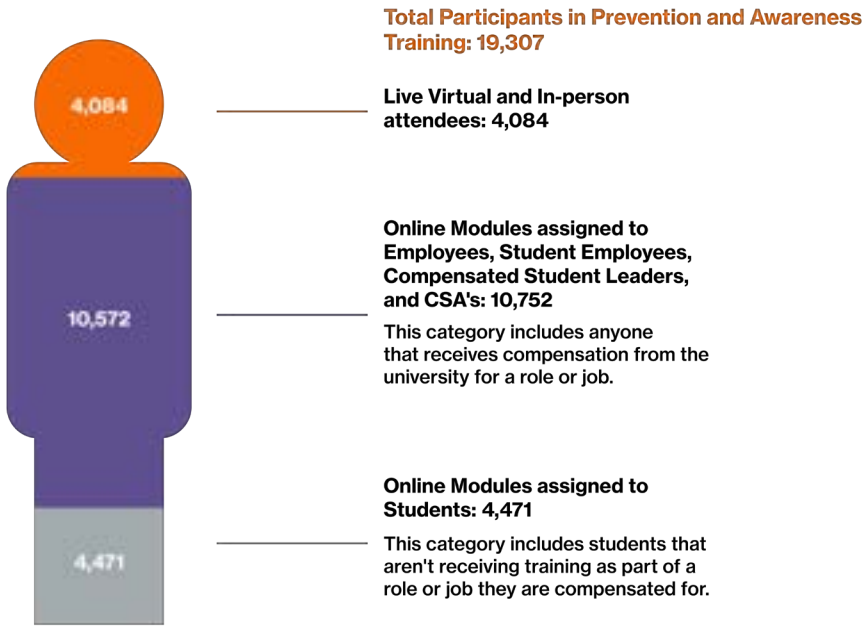
Including Title IX

OCE houses RIT's Title IX office, which oversees and investigates all reports of sex and gender-based discrimination on campus, enforces the university's sex and gender based non-discrimination policies, ensures RIT's adherence to federal and state laws regarding sex and gender-based discrimination, and connects the RIT Community by listening to concerns, connecting individuals with related internal and external resources, and providing educational opportunities to employees and students.

The Title IX Office serves as a resource for every person in the RIT community. This includes students, parents or guardians, employees, alumni, community partners, and visitors who experience or witness sex and gender-based discrimination or harassment, or who have questions or concerns about the same.

Education, Prevention, and Resources

In FY24, the RIT community was presented with numerous opportunities to participate in educational and community events, such as panel discussions, workshops, and other prevention and awareness activities conducted both in-person and virtually.

The Title IX Team coordinated and conducted inaugural Title IX training sessions with over **400 incoming students through RIT 365.**

Total Participants in Prevention and Awareness Training: 19,307

4,084

Live Virtual and In-person attendees: 4,084

10,572

Online Modules assigned to Employees, Student Employees, Compensated Student Leaders, and CSA's: 10,752

This category includes anyone that receives compensation from the university for a role or job.

4,471

Online Modules assigned to Students: 4,471

This category includes students that aren't receiving training as part of a role or job they are compensated for.

Connect with Title IX

Stay up to date on offerings and announcements via our website and Instagram page.

bit.ly/RITOCE

Prevention Education and Programming Numbers:

70 | Total Programs and Trainings in FY24 (up from 57)

63 | Total Trainings led by Title IX Office (up from 46)

9 | Total Online Modules (Managed by TIX)

## Summary of Sex and Gender-Based Complaints

Reported allegations involve a broad range of conduct, including but not limited to, unwanted comments or sexual advances, unwanted touching, relationship violence, stalking, and sexual assault. Complaints of sex discrimination are sorted into broad categories based on the complainants' allegations. Due to privacy and confidentiality obligations, specific details and complexities of the complaints cannot be shared.

Cases deemed "outside of scope" indicate reports that fell outside the scope of the office upon assessment.

In-scope cases are those alleging conduct prohibited by **RIT's Policy on Title IX Sexual Harassment for Faculty, Staff, and Students ("C27.0")**, **the Student Gender-Based and Sexual Misconduct Policy (Policy "D19.0")**, and **RIT's Policy Prohibiting Discrimination and Harassment (Policy "C06.0")**.
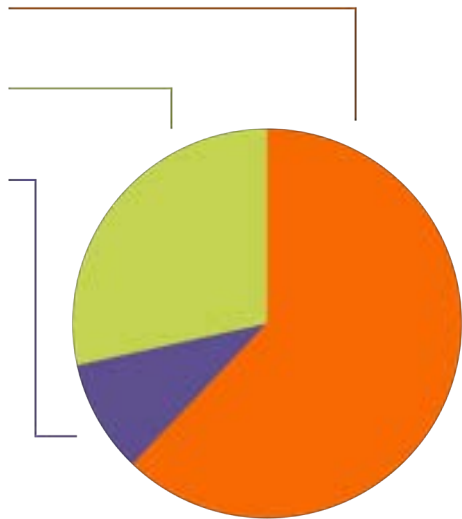
employee
complaints

	In scope	Out of scope
FY22 n=49	28	21
FY23 n=72	50	22
FY24 n=68	39	29
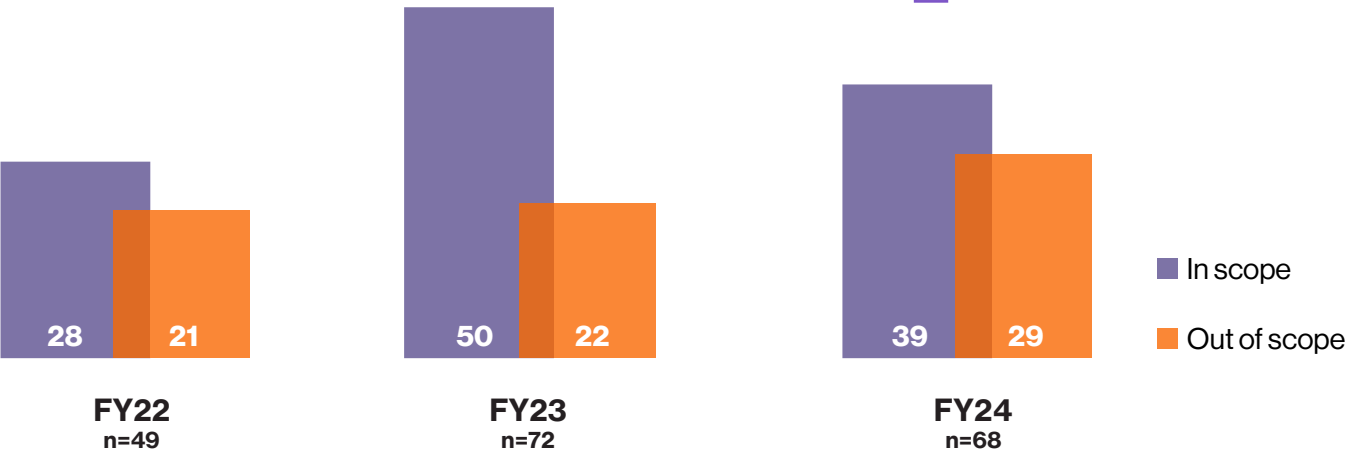
Number of Individual Allegations in Scope by Category

33 Sexual Harassment

5 Discrimination
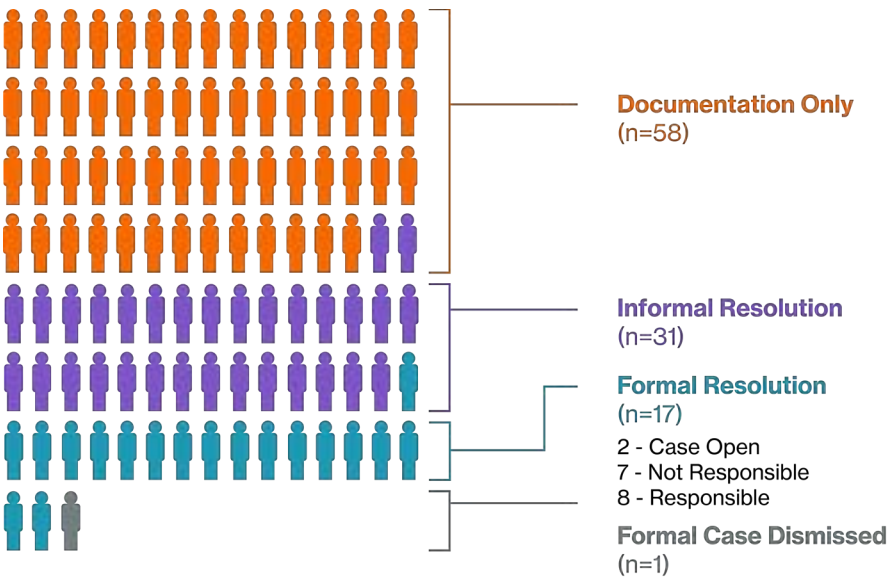
1 Interpersonal Violence

Some complaints may have multiple allegations resulting in greater number of charges and findings per case.

The university received 68 complaints of sex discrimination involving employees. After review and assessment, 39 were deemed within the scope of the Title IX Office, and the remaining cases were either referred to or otherwise resolved by offices other than Title IX.

student
complaints

Outcomes of In Scope Cases for the Title IX Office

Documentation Only (n=58)

Informal Resolution (n=31)

Formal Resolution (n=17)
2 - Case Open
7 - Not Responsible
8 - Responsible

Formal Case Dismissed (n=1)

The following information reflects complaints addressed by the Title IX Office in FY24 involving students, where the respondent is also an RIT student. The information also includes complaints with an accused that is not a member of the RIT community, but the alleged conduct was perpetrated against an RIT student.

Although complaints may contain several allegations with multiple policy violations, complaints involving more than one allegation of sex discrimination are only listed once. If a complaint produces one or more charges and results in a finding of responsibility, the category reflected will be the most severe of the sex discrimination charges.

	In scope	Out of scope
FY22 n=193	127	66
FY23 n=219	151	68
FY24 n=172	107	65

Number of Individual Allegations in Scope by Category

In FY24, 107 student reports fell within the scope of the Title IX Office.

Some complaints may have multiple allegations resulting in greater number of charges and findings per case.

45 Sexual Harrassment

19 Sexual Assault (Fondling)

19 Interpersonal Violence

18 Sexual Assault (Rape)

13 Reported Sexual Assault*
*Type of sexual assault not specified when reported

5 Stalking

4 Refusal to Comply

2 Sex Discrimination

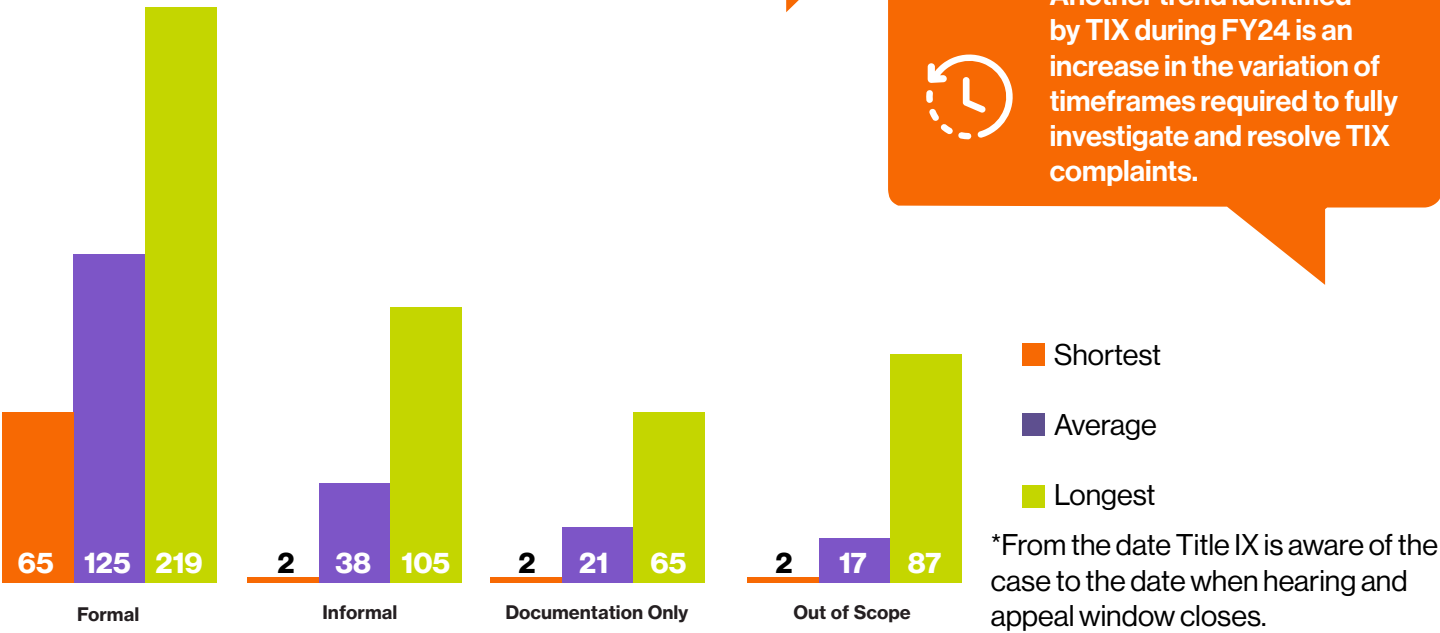**1 Disruptive/Disorderly Behaviour**

Trends and Highlights

A notable trend for FY24 is that, while individual reported cases were down 25%, there was a increase over FY23 in the number of individual complaints and issues reported within the number of cases investigated.

The increase in number of individual issues included in each report resulted in increased complexity of cases received for FY24.

In addition, the timelines for TIX cases in FY24 increased as well, due to a trend in reporters requesting to stop and then restart investigations over the course of the fiscal year.

Moving forward, the Title IX office will not reopen a case closed for lack of response or request from a Complainant to not pursue an investigation at that time. Instead, Title IX will create a new case for the previously reported issue. This change in process will allow for improved transparency surrounding trends and administrative work involved in cases requiring multiple starts and stops.

Both trends noted significantly increase administrative and process oversight and time spent on individual cases for TIX investigations.

Average Days a Case takes from Open to Close, based on the Case Type:*

How long does a case take?

It depends...

Another trend identified by TIX during FY24 is an increase in the variation of timeframes required to fully investigate and resolve TIX complaints.

	Shortest	Average	Longest
Formal	65	125	219
Informal	2	38	105
Documentation Only	2	21	65
Out of Scope	2	17	87

*From the date Title IX is aware of the case to the date when hearing and appeal window closes.

Reporting Options and Resources

In an emergency, individuals should always contact Public Safety immediately at **585-475-3333** or through the TigerSafe app.

OCE publishes a list of reporting options for RIT community members on our **Report a Concern** webpage, and maintains a list of both on-campus RIT and off-campus, community lead **Support Services**.

Report a Concern

Support Services

Clery Act

OCE leads RIT's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), the Violence Against Women Act ("VAWA"), and New York Education Law articles 129-A ("Article 129-A") and 129-B ("Article 129-B").
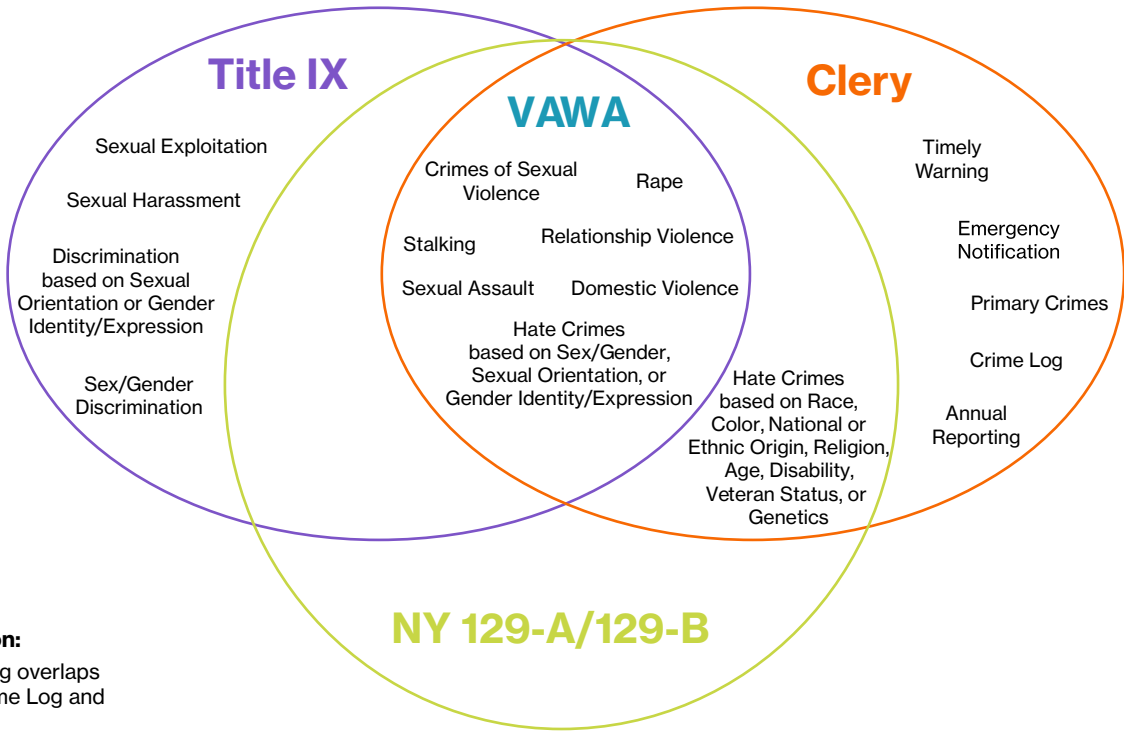
These state and federal statutes focus on ensuring transparency of campus crime policies and statistics at colleges and universities. They mandate universities to adopt certain general safety and security policies and implement comprehensive procedures to prevent and respond to sexual assault, sexual violence, dating and domestic violence, and stalking on campuses.

The Executive Director of Title IX and Clery Compliance and the rest of the Title IX team work together to identify, designate, and train Campus Security Authorities and report data annually to required state and federal data collection systems. In collaboration with the Department of Public Safety, they also oversee and coordinate the university's compliance efforts. These offices co-chair the Advisory Committee on Campus Security and ensure all Clery and VAWA crime data is accurately collected and reported in the **Annual Security & Fire Safety Report.** Additionally, the Assistant Director of Title IX and Clery Compliance creates, delivers, and tracks required education across the campus.

The Executive Director of Title IX and Clery Compliance has oversight responsibilities for RIT's compliance with Title IX, Stop Campus Hazing Act, Clery Act, and VAWA.

The Title IX Team maintains compliance by understanding and working within the complex overlay of the various laws. The diagram below demonstrates how these federal and state laws overlap.

In addition to the overlap noted in the diagram, Article 129-A/B intersects with both Clery Act and Title IX by requiring education and response to sexual violence. The Stop Campus Hazing Act amends the Clery Act with an emphasis on education, reporting, and transparency.

Title IX

VAWA

Clery

Sexual Exploitation

Sexual Harassment

Discrimination based on Sexual Orientation or Gender Identity/Expression

Sex/Gender Discrimination

Crimes of Sexual Violence

Rape

Stalking

Relationship Violence

Sexual Assault

Domestic Violence

Hate Crimes based on Sex/Gender, Sexual Orientation, or Gender Identity/Expression

Hate Crimes based on Race, Color, National or Ethnic Origin, Religion, Age, Disability, Veteran Status, or Genetics

Timely Warning

Emergency Notification

Primary Crimes

Crime Log

Annual Reporting

NY 129-A/129-B

Additional Notation:
Stop Campus Hazing overlaps with Clery Act's Crime Log and Annual Reporting.

University Auxiliary Services Support

Auxiliary Compliance is essential to support the core functions of university-wide Auxiliary Services, which encompasses:

- Dining and Vending Services
- Housing Assignments and Operations
- Auxiliary Services Marketing
- Retail Shops
- Strategy and Sustainability
- Auxiliary Services Technology

Our efforts include management and delivery of training and providing regulatory, operational, and ethical compliance support to the organization.

Highlights from our FY24 efforts include:

Certification and Training

- Managed ServSafe (food and alcohol safety) certification for 22 employees

- Administered AllerTrain®U certification (accredited, manager-level, gluten-free and food allergy training) for 25 full-time employees

- Trained 1,074 student employees in operational safety, food safety, allergens, and emergency situations

- Developed and implemented new training and guidelines for managers, supervisors, and student employees

Regulatory Support and Oversight

- Ensured food safety compliance for more than 310 student club events per semester

- Investigated reports of potential foodborne illnesses (0 confirmed foodborne illnesses)

- Administered advanced notice about fire safety and notice of inspections, including managing follow-up actions, which impacted 8,000+ student residents

- Partnered across RIT to assess accommodation needs and processes for 804 ADA accommodation requests (an increase of 4% over FY23), with noted trends in accommodation requests for support animals, bed shakers (fire safety), and AC units

Conclusion

OCE is dedicated to transparency and continuous improvement and looks forward to sharing our progress with you each year. We are proud of the annual accomplishments herein, including building and sustaining strong community partnerships, and believe the continued increase in RIT community engagement with our services is a testament to the growth of our awareness initiatives. We welcome your feedback and appreciate the time you take to review the report.

RIT

Compliance
and Ethics