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OVERVIEW

This Appendix describes the procedures the University uses when it receives a report of possible Prohibited Conduct by an Employee (referred to as Employee Procedures or Procedures). These Procedures will apply to the Ann Arbor campus, the University of Michigan-Dearborn, the University of Michigan-Flint, and Michigan Medicine (collectively the University).

These Procedures should be read in conjunction with the Policy on Sexual and Gender-Based Misconduct (Policy). The University uses these Procedures to address any such allegations and to impose sanctions, as may be appropriate. For information regarding how to make a report or available resources, please refer to Section VI and Section V, respectively, of the Policy.

Capitalized terms used and not otherwise defined in these Procedures are defined in the Policy [LINK to the Table of Contents of the Policy].

I. OTHER PROCEDURES

At all times, it is within the University’s discretion to determine which policies and procedures apply and under which policy or policies action may be taken. Some Prohibited Conduct may result in separate investigations and potential separate and additional sanctions under multiple University policies. A list of the potential policies and procedures that may apply can be found in [LINK to SPG [ADD]].

II. INITIAL ASSESSMENT

After receiving a report of possible Prohibited Conduct committed by an Employee or Third Party, OIE will make an initial assessment of the reported information and respond to any immediate health or safety concerns raised by the report. An initial assessment based upon the information available to OIE at the time typically will be made within 72 hours after OIE receives a report of Prohibited Conduct.

A. Complainant

As part of the initial assessment, OIE will assess the Complainant's safety and well-being and offer the University's support and assistance and assess the nature and circumstances of the report, including whether it provides the names of and/or any other information that personally identifies the Complainant, the Respondent, any witnesses, and/or any other individual with knowledge of the reported incident. OIE will also ensure that the Complainant receives a written explanation of available resources and options, including the following:

1 The Employee Procedures may be used to resolve reports of Prohibited Conduct against a Third Party. As set forth in the Policy, OIE will determine the appropriate manner of resolution, if any, by the nature of the relationship of the Third Party to the University.
• Support and assistance available through University resources, including the Complainant's option to seek Interim Measures, including Supportive Measures regardless of whether they choose to participate in a University or law enforcement investigation, and/or Protective Measures, when the University pursues an investigation;

• The Complainant's option to seek medical treatment and information on preserving potentially key forensic and other evidence;

• The University's procedural options and the option to report to law enforcement, as applicable;

• The Complainant's right to an adviser of the Complainant's choosing;

• The University's prohibition against Retaliation, that the University will take prompt action when Retaliation is reported, and how to report acts of Retaliation; and

• The opportunity to meet with the Title IX Coordinator in person to discuss resources, rights, and options.

B. Respondent

When OIE decides to initiate an investigation, impose Protective Measures, or take any other action that impacts a Respondent, OIE will ensure that the Respondent is notified and receives written information on available resources and options. OIE will ensure that a Respondent is informed of:

• The nature of the investigation, including the identities of the parties (if known), a concise summary of the conduct at issue, and potential Policy violations;

• The support and assistance available through University resources;

• The Respondent's right to an adviser of the Respondent's choosing;

• The University's prohibition of Retaliation, that the University will take prompt action when Retaliation is reported, and how to report acts of Retaliation; and

• The opportunity to meet with the Title IX Coordinator in person to discuss resources, rights, and options.
III. UNIVERSITY ACTIONS FOLLOWING AN INITIAL ASSESSMENT

Upon completion of an initial assessment, OIE will undertake one of these actions:

- **Investigation**, which generally results in a written report containing a summary of the relevant evidence and finding. The final investigation report is provided to the appropriate University official for appropriate action. An investigation generally is used when the reported concerns indicate possible Prohibited Conduct and relevant evidence is likely available to the investigator. The University will strive to complete resolution of any matter by investigation, which begins with the determination that an investigation will be opened through the completion of the investigation and sanction, if any, within 115 calendar days.

- **Mediation** is an informal, but structured interaction between the Complainant and the Respondent with the help of a neutral mediator to achieve a resolution satisfactory to both parties. Mediation is used when both parties voluntarily agree to mediate the concerns and the concerns do not involve behavior that, if it were found to have occurred, would result in significant employment discipline. Mediation is usually not used when the concerns involve recurring behavior and will not be used in cases of reported Sexual Assault. If mediation is unsuccessful, the matter may proceed to investigation or another appropriate response. Should the matter proceed to investigation, information obtained through the mediation process may not be used in the investigation process. In general, the mediator will strive to complete mediation within 90 calendar days from the date the matter is referred to the mediator.

- **Other measures**, which may include training or education for specific groups or members of the University Community. Other measures are generally used when a report is received, but the identity of the Respondent is unknown or the report does not allege Prohibited Conduct that would constitute a possible Policy violation, but the behavior, if it occurred as alleged, is inappropriate employment-related behavior.

- **Referral** means that the report of possible Prohibited Conduct is directed to another appropriate office or process. In some cases, OIE will work jointly with the other office or process to address the possible Prohibited Conduct. A referral generally is used when the Policy or these procedures do not apply, such as when the report does not describe possible Prohibited Conduct but raises concerns of inappropriate behavior falling outside of the Policy. A referral may also occur when the report raises issues addressed by multiple policies or offices.

- **Dismissal** means closing the complaint if the allegations presented do not rise to the level of a Policy violation and a referral is not appropriate.

- **Pre-Investigation Review**: In some cases, OIE may conduct a pre-investigation review intended to develop more information as to which of the above actions, or other reasonable response, may be appropriate. A pre-investigation review is used in a variety of instances, such as when a report of possible Prohibited Conduct is
received, but it is unclear who the impacted party and/or Respondent is, or whether relevant evidence is available to the investigator. If the review identifies the Respondent and indicates that relevant evidence of possible Prohibited Conduct is likely available to the investigator, the matter generally proceeds to investigation. If that does not occur, a different action may be taken or the matter may be closed pending receipt of additional information. The duration of a pre-investigation review may vary significantly, and OIE will strive to complete a pre-investigation review within 70 calendar days.

In all cases, the final decision on whether, how, and to what extent the University will proceed and whether other measures will be taken in connection with any report of possible Prohibited Conduct rests solely with OIE. In addition, to the extent the University exceeds any of the time frames set forth above, OIE will notify the parties in writing of any extension of this time frame and the reason for such extension.

A. Complaints Against Unaffiliated Third Parties

Generally, if a report of Prohibited Conduct is against someone who has no affiliation with the University, the University's actions will be limited. Even though the University's ability to take direct action against such a person may be limited, the University will still take steps to provide the Complainant support and assistance available through University resources and resources available from entities outside the University (including law enforcement).

B. Complainant Request for No Investigation or to Not Participate in an Investigation

In some instances, the Complainant does not wish for an investigation to occur. The University will consider the Complainant’s wishes, but retains the discretion to determine whether sufficient evidence exists without the Complainant’s cooperation and whether an investigation will occur. In those instances where it is appropriate, non-investigative options, such as mediation, may be considered.

The University may pursue a report of possible Prohibited Conduct without a participating Complainant. For example, this might occur when the person(s) directly impacted by the reported behavior either is not willing to participate or is willing to provide a statement, but does not wish to serve as a Complainant(s). The University will investigate without a participating Complainant if doing so provides the Respondent a fair opportunity to respond. In cases where the University investigates without a participating Complainant, OIE will notify the Complainant that the University intends to initiate an investigation, and that the Complainant is encouraged, but not required, to participate in the investigation or in any of the actions taken by the University. Generally, a decision not to participate as a Complainant means that the Complainant waives the rights generally afforded to a participating Complainant. However, under limited circumstances, the University may provide some or all of the rights of a
Complainant as defined in this Policy or otherwise required by law as deemed appropriate by OIE.

If a Complainant declines to participate in an investigation, the University's ability to fully investigate and respond to a report of Prohibited Conduct is limited. The University may, however, pursue other steps to limit the effects of the Prohibited Conduct and prevent its recurrence.

**IV. SUPPORTIVE AND PROTECTIVE MEASURES (ALSO KNOWN COLLECTIVELY AS INTERIM MEASURES)**

Interim Measures, including an explanation and examples of Supportive and Protective Measures, are described in [LINK to Section VII of the Policy].

During the initial intake meetings with the parties and the witnesses, OIE will discuss Interim Measures. If an individual is interested in an Interim Measure(s), OIE assesses with relevant University offices whether the Interim Measure or an alternative is possible and appropriate. OIE in conjunction with relevant University offices, as appropriate, has the discretion to determine whether to implement an Interim Measure. Once an Interim Measure(s) is approved, Human Resources or another relevant office coordinates its implementation.

Individuals may also request Interim Measures through a Confidential Resource [LINK to Section V of the Policy]. Confidential Resources can often arrange a Supportive Measure directly; however, they generally need to interact with other University offices to do so, particularly if a Protective Measure is requested. The Confidential Resource will not interact with other University offices to inquire about arranging an Interim Measure unless the individual requesting the Interim Measure waives confidentiality for that purpose. The individual retains the option of requesting the Interim Measure through OIE.

Interim Measures may also be appropriate for witnesses, following the initiation of an investigation and using the same avenues of requesting Interim Measures outlined above.

Implementation of Supportive or Protective Measures should not be taken to suggest that the University has made any decision about the merits of the report.

Interim Measures are not imposed mechanically, and are instead selected based on an individualized inquiry of the facts and circumstances attendant to each particular request. Protective Measures are designed to balance the protection of the parties with minimizing the impact on the Respondent’s ability to access the University’s programs and activities.

The University will keep private any Interim Measures provided under these Procedures to the extent practicable, and will promptly address any reported Violation of Protective Measures [LINK to Section VIII(B)(9) of the Policy].

In those instances in which the University determines that suspension without pay is an appropriate Protective Measure and the Respondent was not offered the opportunity to challenge the suspension without pay before it was imposed, the Respondent may present a written
challenge regarding the need for or the adequacy of the suspension without pay to OIE. Once a written challenge of the suspension without pay is received, OIE will involve the relevant University office(s), such as Human Resources and department leadership, and schedule a meeting with the Respondent. OIE and the relevant University office(s) will hear the Respondent’s concerns, conduct any necessary follow-up, and render a determination, usually within 72 hours of the meeting. The suspension without pay will remain in effect pending the determination. If the determination is that the Respondent should not be on unpaid status, the Respondent will be returned to paid status and receive any back pay owed for the period of time during which they were on unpaid status. This process shall not apply to employees covered by collective bargaining agreements who are required to follow the processes under those agreements.

V. INVESTIGATION

A flowchart depicting the investigation process can be found here.

A. Core Principles

1. Role of Investigator. Whenever an investigation is initiated, OIE will designate an investigator. The investigator must be impartial, free of any actual conflict of interest, and have relevant training and experience.

A Complainant or a Respondent who has concerns that the assigned investigator cannot conduct a fair and unbiased review (e.g., has a personal connection with one of the parties or witnesses, etc.) may report those concerns to:

Jeffery Frumkin, Interim OIE Senior Director & Deputy Title IX Coordinator

institutional.equity@umich.edu

Office for Institutional Equity
2072 Administrative Services Building
1009 Greene Street
Ann Arbor, Michigan 48109
(734) 763-0235 (telephone)
(734) 647-1388 (TTY)

The Interim OIE Senior Director will assess the circumstances and determine whether a different investigator should be assigned to the matter.

2 The Title IX Coordinator may designate herself to investigate.
2. **Presumption of Good Faith Reporting.** The University presumes that reports of Prohibited Conduct are made in good faith. A finding that the behavior at issue does not constitute a violation of this Policy or that there is insufficient evidence to conclude that the incident occurred as reported does not mean that the report was made in bad faith. However, a person who knowingly and intentionally files a false complaint under the Policy may be subject to University discipline.

3. **Presumption of Non-Violation and Standard of Proof.** The Respondent is presumed not to have violated the Policy unless a preponderance of the evidence supports a finding of a Policy violation. This presumption may be overcome only where the investigator concludes that there is sufficient evidence, by a preponderance of the evidence, to support a finding that the Respondent violated the Policy. A preponderance of the evidence means that it is more likely than not, based on all the relevant evidence and reasonable inferences drawn from the evidence, that the Respondent violated this Policy.

4. **Expectation of the Complainant, the Respondent, and the Witnesses.** The Complainant, the Respondent, the witnesses, and others sharing information with the investigator are expected to provide all relevant information at the time of their interview and upon reviewing the draft summary of their statement, and to be truthful throughout the process.

5. **Advisers.** Throughout the investigation process, a Complainant or a Respondent may have an adviser of their choice. An adviser is an individual chosen by a party to provide support and guidance to them during the investigation process; the adviser does not participate in the process on behalf of the party. An adviser may not be a witness or otherwise have any conflicting role in the process. An adviser may be an advocate and/or an attorney.

   The University has the right at all times to determine what constitutes appropriate behavior on the part of an adviser and to take appropriate steps to ensure compliance with the Policy and these procedures.

6. **Prior Sexual Contact Between the Complainant and the Respondent.** Prior sexual contact between a Complainant and a Respondent will never be used to prove character or reputation. Moreover, evidence related to the prior consensual sexual history between the parties is generally not relevant to the investigation and will be considered only in limited circumstances. For example, if the
question being determined is whether consent was given through mutually understandable words or actions, information about prior sexual contact, in the totality of the evidence considered, may help the investigator understand the manner and nature of sexual communication between the two persons. This information may therefore be relevant in determining whether consent was sought and given during the incident in question.

In addition, and as required by applicable state and federal law, other prior consensual sexual activity of the Complainant or the Respondent may be relevant only in certain, very limited circumstances.

7. **Prior or Subsequent Conduct of the Respondent.** Prior or subsequent conduct of the Respondent with parties other than the Complainant will never be used to prove character or reputation, but may be considered for other purposes, such as determining pattern, knowledge, intent, or the Respondent's reasons for taking the action. For example, evidence of a pattern of Prohibited Conduct by the Respondent, either before or after the incident in question, may be deemed relevant to the determination of whether the Respondent violated the Policy or engaged in inappropriate behavior. A finding in a previous investigation that the Respondent violated the Policy by engaging in similar conduct may be relevant evidence of a pattern of behavior. Likewise, evidence in a previous investigation that the Respondent engaged in similar behavior, but the behavior was not at that time determined to be sufficiently severe, persistent, or pervasive as to constitute a Policy violation, may be relevant to assessing severity, persistence and pervasiveness, or relevant evidence of a pattern, in a subsequent investigation.

The relevance of pattern evidence will generally be determined based on an assessment of whether the previous or subsequent conduct was similar to the conduct under investigation or indicates a pattern of Prohibited Conduct. The investigator will determine the relevance of this information and both parties will be informed via inclusion of such information in the preliminary report if evidence of prior or subsequent conduct is deemed relevant.

8. **Witnesses.** Witnesses must have observed the acts in question or have information relevant to the incident(s) and cannot be participating solely to speak about an individual's character.

Witnesses will have the opportunity to discuss the investigation process and participate in an interview. Where a witness has provided relevant information, the investigator will produce to the Complainant
and the Respondent for their review and comment, a written summary of the witness' interview, which will identify the witness by name and relationship to the parties and the University.

B. Investigation Process

The investigation affords both the Complainant and the Respondent an opportunity to submit information and other evidence and to identify witnesses. During an investigation, the investigator typically will meet separately with the Complainant, the Respondent, and relevant witnesses; offer the parties the equal opportunity to submit and/or identify related and relevant information or evidence; and gather other relevant information or evidence reasonably available to the investigator. Following the interview, the parties and witnesses will be provided with a draft summary of their statement so that they have the opportunity to comment on the summary and ensure its accuracy and completeness.

The Complainant or the Respondent may, under limited and extenuating circumstances, make a request to the investigator to submit a written statement instead of participating in an interview.

1. Notice of the Investigation. The Respondent will be informed in writing of the initiation of the investigation prior to their interview. The written information will include the identities of the Complainant(s), if known, a concise summary of the conduct at issue (including when and where it occurred, if known), and potential Policy violations. The Respondent will be informed in writing if, during the investigation, additional information is disclosed that may also constitute Prohibited Conduct under the Policy.

2. Evidence. The investigator, not the Complainant or the Respondent, is responsible for gathering relevant evidence to the extent reasonably possible. However, each person will be given the opportunity, and is encouraged, to identify witnesses; provide other relevant information, such as documents, communications, photographs, and other evidence; and suggest questions to be posed to the other party or a witness(es). Although the investigator need not do so, the investigator may draw a negative inference from a refusal to provide information that the investigator knows exists.

The investigator will review all information identified or provided by the parties as well as any other evidence they obtain and will determine the appropriate relevance and probative value of the information developed or received during the investigation. The investigator has the discretion not to interview a witness if they do not possess relevant
evidence or if the evidence provided would be cumulative. All relevant evidence to be considered in reaching a finding will be shared with the parties for their review and comment in a preliminary investigation report, as described below.

The investigator may consult experts when expertise on a specific topic or submitted evidence is needed to gain a fuller understanding of the relevance or value of the evidence or the issue at hand. In instances where an expert is consulted, the investigator will determine whether the expert has any connection to the reported incident, conflicts of interest, or bias. The expert's identity will be shared with the Complainant and the Respondent so that they may also have the opportunity to identify any risk of such connection, conflicts or bias for assessment by the investigator.

3. **Consolidation of Investigation.** OIE has the discretion to consolidate multiple reports into a single investigation if evidence relevant to one incident might be relevant to the others. Consolidation might involve a single or multiple Complainants, a single or multiple Respondents, and conduct that is temporally or logically connected. If investigations involving multiple Complainants and/or multiple Respondents are consolidated, each party will have access to all of the information being considered; including as provided by all involved Complainants, all involved Respondents, and all involved witnesses.

4. **Coordination with Law Enforcement.** Where the University is made aware that there is a concurrent criminal investigation, the investigator will make reasonable efforts to contact the Division of Public Safety and Security (DPSS) to inform them that a University investigation is also in progress; ascertain the status of the criminal investigation; and determine the extent to which any evidence collected by law enforcement may be available to the University in its investigation.

At the request of law enforcement, the University may agree to temporarily defer part or all of the investigation until after the initial evidence-gathering phase of the law enforcement investigation is complete.

In some instances, aspects of a criminal investigation may be available and relevant to the University’s processes; however, standards for criminal investigation/prosecution are different from the standards for a violation of this Policy. Therefore, the University will not base its decisions under this Policy solely on law enforcement determinations and/or the outcomes of any criminal proceedings.
5. **Time Frame for Completion of Investigation.** The University will strive to complete the investigation, meaning the period from commencement of an investigation through to completion of an investigation report, within 70 calendar days. An investigation begins typically either the date of the Complainant's interview or such other time as the Complainant provides sufficient information for the investigator to proceed with an investigation, and requests that an investigation be opened, or such time as OIE determines that an investigation will be opened. Additional time beyond 70 calendar days may be necessary to ensure the integrity and completeness of the investigation, to comply with a request by law enforcement for temporary delay to gather evidence, to accommodate the availability of parties and/or witnesses, to account for University breaks or vacations, to account for case complexities including the number of witnesses and volume of information provided by the parties, or for other legitimate reasons.

6. **Preliminary Investigation Report.** After the Complainant and the Respondent have had the opportunity to comment on their own statement and to identify witnesses and other potential information, and the investigator has completed witness interviews and the gathering of evidence, the investigator will prepare a preliminary report.

The investigator will provide the Complainant and the Respondent with the preliminary report, which will include, as applicable, the Complainant's statement, the Respondent's statement, a summary of each witness' statement and either a copy or written summary of any other information the investigator in their discretion deems relevant.

The Complainant and the Respondent will generally have one opportunity to concurrently review the preliminary report and provide feedback in response. The Complainant and the Respondent must submit any comments, feedback, additional documents, evidence, suggested questions for individuals interviewed, requests for additional investigation, names of additional witnesses, or any other information they deem relevant to the investigator, up to 15 pages of comments, additional documents or other evidence, within 5 calendar days after it is sent to them for review. The parties' feedback may be attached or otherwise incorporated into the final investigation report.

In the event that new, relevant information is provided or identified, the information will be incorporated into the preliminary report and the Complainant and the Respondent will be provided a second opportunity to review and provide feedback regarding the new information before the investigator proceeds with the final investigation report. Identification of
new and relevant information after the parties’ review of the preliminary report is likely to extend the time frame of the investigation.

If, prior to the parties’ review of the preliminary investigation report, the Respondent admits to engaging in the behavior at issue, OIE may issue a final investigation report without first providing the parties the opportunity to review a preliminary investigation report. The parties will be notified of this prior to the issuance of the final investigation report.

7. **Final Investigation Report.** After receiving any comments submitted by either party, or after the 5 calendar day comment period has lapsed without comment, the investigator will address any relevant issues identified by the Complainant and/or the Respondent, and as appropriate, pursue any additional investigative steps as needed, and then issue a final investigation report. The primary recipient of the report will generally be the person(s) at the University with the necessary authority to take appropriate action in response to any finding or other information contained in the report (e.g., an individual(s) with supervisory authority over the Respondent).

The investigator’s final investigation report will consist of the preliminary report, as supplemented by the relevant feedback submitted; any subsequent information gathered; the investigator’s findings; and a summary of the investigator’s rationale in support of the findings.

The investigator's report must be reviewed and approved by the Title IX Coordinator before it is issued. OIE will provide identical copies of the final investigation report to the primary recipient of the report, the Complainant, and the Respondent. OIE will provide the report to the Complainant and the Respondent simultaneously.

If a Complainant has chosen not to participate in the investigation but requests to be notified of the outcome, the University will notify the Complainant. If a Complainant has chosen not to participate in the investigation and has requested not to be notified of the outcome, the University will honor that decision.

Individuals participating in the process as witnesses will not receive a copy of the report.

8. **Finding of Policy Violation(s).** When the investigator determines that there is sufficient evidence, by a preponderance of the evidence, to support a finding of a Policy violation, the Respondent will be sanctioned as set forth below.
9. **Finding of Inappropriate Behavior, but No Policy Violation(s).** The investigator may determine that the evidence does not, by a preponderance of the evidence, support a finding of a Policy violation, but does support the conclusion that behavior occurred that is inappropriate employment-related behavior. In these cases, the University may sanction the Respondent to address the inappropriate behavior.

10. **Finding of No Policy Violation(s) or Inappropriate Behavior.** When the investigator determines that there is insufficient evidence, by a preponderance of the evidence, to support a finding of a Policy violation, and there is no finding that other inappropriate behavior occurred, the matter is concluded.

VI. **SANCTIONS**

If a Respondent is found to have violated the Policy, the Respondent will be sanctioned. Sanctions are intended to eliminate the conduct, prevent its recurrence, and remedy its effects, while supporting the University's educational mission and fulfilling its obligations under the law. In keeping with the University’s commitment to foster an environment that is safe, inclusive, and free from discrimination and harassment, the University has wide latitude in the imposition of sanctions tailored to the facts and circumstances of the Prohibited Conduct, the impact of the conduct on the Complainant and University Community, and accountability for the Respondent. Sanctions or other interventions may also serve to remedy the discriminatory effects of the Prohibited Conduct on the Complainant and others, including any systematic actions the University determines to be appropriate for the broader University Community. Other interventions may include, for example, targeted or broad-based educational programming or training.

The scope of possible sanctions will be dependent upon employee disciplinary procedures applicable to the Respondent, but may include one or more of the following:

- Required education and/or training
- Informal and/or formal counseling
- Progressive disciplinary action
- No-contact directive
- Transfer of position
- Ineligibility for merit increase, sabbatical leave, and/or other discretionary benefits
- Removal of administrative appointment
- Restriction on access to students, support services, and/or facilities
- Demotion
- Suspension
- Termination of employment
- Restriction from future employment at the University
Sanctions will be determined by the Respondent’s supervisor or other appropriate University administrator. Sanctions generally will be issued within 45 calendar days of the issuance of the final investigation report.

The University will provide simultaneous notice in writing to the Complainant and the Respondent of the sanction(s).

Any sanction or combination of sanctions imposed upon a Respondent will be documented in the Respondent’s personnel file. Nothing in these Procedures prevents the supervisor or other appropriate University administrator from imposing disciplinary action against a Respondent where the final investigation report demonstrates that the Respondent engaged in inappropriate conduct, regardless of whether the Respondent has been found responsible for Prohibited Conduct under the Policy.

If the Respondent is a Student and an Employee, the University’s Title IX Coordinator will determine which procedures apply based upon the facts and circumstances, such as whether the Respondent’s status as a Student or an Employee predominates in the context of the Prohibited Conduct. If a Student-Employee is found to have engaged in Prohibited Conduct, the Student-Employee may be subject to sanctions both in connection with their employment and in connection with their student status, as appropriate under this and other applicable procedures.

VII. RECORDS RETENTION

The University shall retain the official OIE investigatory file for a period of 7 years after the date of case closure. In cases in which a Respondent was found to have violated the Policy and was disciplined, the discipline will be placed in the Respondent’s personnel file and will be retained in accordance with the requirements of LINK to SPG 201.46.

VIII. ANNUAL REPORT

OIE will issue an Annual Report to the University of Michigan community providing an overview of the number and nature of reports of Prohibited Conduct received during the preceding fiscal year. The report will provide the community with an overview of response efforts.