

Revised interim adjudication procedures for Title IX sexual harassment involving minor participants in non-degree programs¹ (effective January 9, 2025)

In compliance with Title IX of the Higher Education Amendments of 1972 (“Title IX”), the Campus SaVE Act, and other applicable laws, the Johns Hopkins University (“JHU” or “the University”) prohibits sexual harassment and other types of sexual misconduct in all JHU affiliated programs.

All minor participants in JHU non-degree programs (including, but not necessarily limited to, youth programs and camps) are expected to comply with the conduct expectations set forth in Sections II and III of the University’s [Revised Interim Sexual Misconduct Policy and Procedures](#) (“SMPP”).

Reporting: Any individual who wishes to make a report or file a complaint of sexual and/or sex-based misconduct may use the University’s [Online Reporting System](#) or contact the University’s [Title IX Coordinator](#), the executive director of the relevant non-degree program, or any other leader, teacher / instructor, or administrator at the relevant non-degree program.

Reports of sexual misconduct may be filed anonymously, meaning that the individual files the report without providing their name or other identifying information. However, anonymous reporters are encouraged to speak with the Title IX Coordinator or their designee regarding the potential limitations of an investigation being conducted based on an anonymous report. Regardless of whether an investigation is conducted, anonymous reports will be reviewed to determine whether preventive or remedial action should be taken, such as prevention or educational programs, or increased safety patrols or monitoring.

Individuals are encouraged, but not required, to report any potential criminal conduct to law enforcement authorities and can receive assistance from University employees if requested.

Responsible employees: “Responsible Employee” is a designation given to most University employees, indicating that they have a duty to report sexual misconduct that they learn of to the University’s Title IX Coordinator. Responsible Employees are designated based on the University’s determination that they have the authority to redress sexual misconduct, have the duty to report sexual misconduct to the Title IX Coordinator, or are employees who a student reasonably believes have such authority or duty. For employees working with minor participants in non-degree programs, Responsible Employees designated by the University include, but are not limited to:

- Residential staff, including Resident Advisors
- Academic and residential administrators and advisors
- Faculty, instructors, teachers, lecturers, and teaching assistants
- Department heads and chairs, directors, and deans,
- Employees serving in a leadership or supervisory role
- Staff from student affairs, the Office of Institutional Equity, and Human Resources
- Campus security officers
- Athletic coaches and staff

Responsible Employees must promptly report all known relevant information to the Title IX Coordinator, including the name of the complainant, respondent, and any witnesses and any other relevant facts, including the date, time, and location of the misconduct.

¹ Due to a January 9, 2025 federal court decision, the August 1, 2024 Title IX regulations have been vacated nationwide. As a result, the University was required to revise its policies and procedures that had been based on these now-vacated regulations. In the short term, to ensure prompt compliance, the University issued Revised Interim Sexual Misconduct Policy and Procedures effective January 9, 2025.

Responding to reports: Upon receiving a report of sexual misconduct, the Title IX coordinator or designee will promptly contact the Complainant² to discuss the report, supportive resources, and potential interim supportive measures. Then, in consultation with other University administrators, it will be determined whether the alleged conduct could constitute Title IX Sexual Harassment and be adjudicated pursuant to the following procedures or another University process.³ The Complainant will be notified accordingly.

Interim measures and supports: Regardless of which University process applies, supportive resources and measures are available as set forth in Section VII of the SMPP. Supportive measures may include connection with an academic counselor or No Contact Orders between the involved parties. The interim removal of an accused individual from some or all programming pending the completion of the adjudication process can also be a supportive measure if University administrators conduct an individualized safety and risk assessment and determine that there is an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual misconduct that justifies removal.

Formal complaint and notice: If it is determined that this adjudication process for Title IX Sexual Harassment applies, the University's Assistant Vice Provost/Title IX Coordinator or designee will meet with the Complainant to explain the rights afforded under this process and next steps. In order to initiate an investigation pursuant to the following adjudication procedures, a "Formal Complaint" (as defined in Section III of the SMPP) must be submitted by the Complainant or signed by the University's Assistant Vice Provost/Title IX Coordinator alleging sexual misconduct against the Respondent and requesting an investigation.

Investigation: Once a formal complaint is received, an investigation will be conducted and an investigation report will be prepared pursuant to the process set forth in [Appendix G, Section E to the SMPP](#).

Determination: The completed investigation report will be forwarded to the individual(s) who will serve as the Decision-Maker in these matters. The Decision-Maker will make the final decision as to whether the conduct alleged in the complaint constitutes a violation of University policy by applying a "preponderance of the evidence standard."

After receipt of the investigative report and prior to the Decision-Maker reaching a decision, each party shall be permitted to submit to the Decision-Maker relevant questions to be asked of the other party and/or any witnesses, including those challenging the credibility of the party or witness. The Decision-Maker will review the questions for relevancy (as discussed in Section F of Appendix G to the SMPP) and then direct relevant questions to the parties and/or witnesses. In cases where the Decision-Maker excludes a question as not relevant, the Decision-Maker will explain this decision. Once the Decision-Maker has completed questioning of parties and witnesses, the Decision-Maker will draft a final, written determination consistent with the requirements set forth in Section G of Appendix G of the SMPP.

Until and unless the University issues a final determination of responsibility, the Respondent is presumed to be not responsible.

Sanctions: In cases where there is a determination that a policy violation occurred, the University will issue a sanction in accordance with [Section H. of Appendix G to the SMPP](#).

² In cases where the parties involved in a sexual misconduct matter are minors, their parent(s) or guardian(s) will be notified. Both parties are permitted to have a supporter present (who can be a parent, guardian, lawyer, advocate or other individual) at all meetings throughout the sexual misconduct adjudication process.

³ These adjudication procedures do not apply to minors who are enrolled in undergraduate or graduate degree-seeking programs at other universities and who are taking a JHU course for credit; instead, the full procedures set forth in Appendix G of the SMPP govern Title IX Sexual Harassment matters involving those individuals.

Retaliation: Retaliation against a person because that person made a complaint or report of sexual misconduct or participated in any way in the investigation or resolution of such a complaint or report, or who exercises their rights or responsibilities under University policy, procedures, or the law, is strictly prohibited and grounds for disciplinary consequences.

Appeals: The final, written determination may be appealed pursuant to the process set forth in Section H. of Appendix G to the SMPP. Information about appeals will be included in the final, written determination described above.

The University's SMPP shall govern any portion of the adjudication process not specifically referenced above.