



Ramapo: Advance

A PLAN TO ADVANCE CAMPUS SAFETY AT
RAMAPO COLLEGE OF NEW JERSEY

RAMAPO COLLEGE OF NEW JERSEY
WWW.RAMAPO.EDU/ADVANCE

AUGUST 6, 2015

TO REPORT AN INCIDENT

If you are a victim and/or survivor of sexual assault and would like to speak with someone, we are here to help you. We are committed to providing timely support and assistance to victims and/or survivors* of sexual violence. In the aftermath of a sexual assault, victims and/or survivors have many options for support, reporting, and advocacy services.

Confidential support is available 24 hours a day, 7 days a week.

Any student in need of immediate assistance should call Counseling Services at **201-684-7522** during regular business hours. After hours, please contact Public Safety at **201-684-6666** to contact an emergency counselor.

Anonymous Reporting:

The Public Safety Department Complaint Form is available at www.ramapo.edu/publicsafety/complaint-form for anonymous reporting.

To file a report, a victim and/or survivor can contact any of the following: the Title IX coordinator, the Office of Public Safety or the Mahwah Police Department. Specific information is available at www.ramapo.edu/get-support

Please be aware that by contacting The Public Safety Department, a victim and/or survivor is not obligated to file an incident report. At the victim and/or survivor's request, only an anonymous crime report will be completed for statistical purposes.

***A note on language:** Throughout our resources, the words “victim” and “survivor” are used interchangeably. We respect the decision of those who have experienced violence to identify as a victim or a survivor. We recognize that choosing to identify as a survivor is an important part of the healing process for some who have experienced sexual violence.

INTRODUCTION

This plan is a commitment to our students, their parents, our stakeholders, and to the entire community. It's a promise to take immediate, substantive action to improve how we work to educate our students and prevent sexual misconduct and alcohol abuse within our community, as well as to ensure cases are swiftly and fairly adjudicated.

Our purpose for publishing *Ramapo: Advance* is to publicly share our plan for integrating and activating campus safety recommendations contained in two separate reports produced by external experts. D. Stafford & Associates, a campus safety and security consultant evaluated our existing policies against statutory and regulatory compliance requirements and current best practices in campus safety. A second report by former New Jersey Attorney General Anne Milgram evaluated campus policies and practices with an objective to address potential issues and submit recommendations for Ramapo to consider for longer term enhancements.

Each initiative within this plan is pegged to a recommendation made by one or both consultants. Each initiative is actionable, measurable, and is designed with specific intent to establish long-term best practices at Ramapo. This plan also establishes mechanisms for continual review, evaluation, and enhancements to our policies, procedures, and practices, ensuring we will always advance campus safety.

Ramapo: Advance is a forward-looking, solutions-based plan that establishes an ambitious but achievable agenda for advancing campus safety. As we implement these initiatives, we will remain focused on our mission to provide students a strong foundation for a lifetime of achievement.

Throughout my interactions with Ramapo and its constituents, I have been deeply impressed by the commitment of the entire college community to providing a safe campus for its students.

... The seriousness with which the administration at Ramapo has taken this matter has been evident in the level of access that I have been provided. At all times throughout my review I have been given complete and full access to both people and information.

When reviews such as this occur, a temptation exists to focus only on the areas in need of further reform. Here, I would encourage a focus on the positive: it is unusual for a college to take such a deep and searching lens to itself to figure out how to do better. This, above all, should be encouraged and seen in the spirit for improvement with which it has come.

-Former Attorney General Anne Milgram, Esq.
"Ramapo College Report and Recommendations"

ABOUT THIS PLAN

Ramapo: Advance was substantially informed by an in-depth report prepared by the consulting firm, D. Stafford & Associates, a leading authority on Title IX and Clery Act compliance. The firm is an organizational member of the International Association of Campus Law Enforcement Administrators (IACLEA) and the International Association of Professional Security Consultants (IAPSC). The report was initiated in December 2014 and concluded July 1, 2015 after more than six months of research and analysis. During that time, three students, 23 administrators, and faculty representatives from College-wide groups were interviewed.

- A comprehensive audit of Title IX compliance, including a review of existing sexual misconduct policies and procedures and Title IX procedures.
- A review of the college's organizational structure for managing Title IX cases.
- A feasibility analysis of forming a unified Title IX policy/process that covers all aspects of Title IX from education and prevention to informal and formal resolution.
- An assessment of the manner in which College staff is trained to manage and report sexual misconduct, alcohol and other drug education, and bystander intervention.
- A review of the disciplinary process used for cases of sexual misconduct.
- A review of how the College enforces policies related to sexual assault and alcohol.

Ramapo: Advance was also informed by a report produced by former New Jersey State Attorney General Anne Milgram which was furnished on July 29. The request made of her was twofold: review and comment on Ramapo College's policies for defining and adjudicating sexual assault and alcohol complaints and, secondly, provide an overarching commentary on the Stafford report's delineation of an appropriate policy structure. Milgram interviewed three students, four administrators, and the Chair of the Board of Trustees.

By comparison to the Stafford report, Ms. Milgram's task was more oriented to the culture and operations of the College so it is to be expected that some of her recommendations would raise broader policy issues that will require internal discussion and deliberation.

Ramapo College of New Jersey would like to sincerely thank D. Stafford & Associates and Ms. Milgram for their analyses and recommendations, which are the foundation for this plan.

OVERVIEW | *RAMAPO: ADVANCE*

Ramapo: Advance (hereafter referred to as the “Plan”) is a compilation and concentration of recommendations contained in the third-party reports produced by D. Stafford & Associates and former Attorney General Milgram. It also incorporates recommendations contributed by third-party public safety experts, administrators, and law enforcement officials. The Plan is organized into initiatives, each designed to enact, enforce, evaluate and continually enhance each of the adopted recommendations. The initiatives are:

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1. ENHANCE RAMAPO COLLEGE OF NEW JERSEY'S TITLE IX INFRASTRUCTURE

STRATEGIC INITIATIVE

Maintain Ramapo's existing structure of the Director of Affirmative Action and Workplace Compliance as the Title IX Coordinator, and continue to report to the President. The College's Title IX Coordinator appoints Deputy Coordinators and Investigators, and will work to ensure that complaints of sex-based discrimination are responded to promptly, fairly, and within the requirements under Title IX and the Clery Act.

IMPLEMENTATION PLAN	TIMEFRAME
<input type="checkbox"/> Review and revise the Director of Affirmative Action and Workplace Compliance/Title IX Coordinator job description to further align with recommended responsibilities in the Stafford Report.	Completed

2. IDENTIFY AND TRAIN INVESTIGATORS; FORMALIZE STRUCTURE

STRATEGIC INITIATIVE

The permanent Director of Affirmative Action and Workplace Compliance/Title IX Coordinator shall establish criteria for investigators, identify eligible persons for inclusion in the investigators pool, oversee initial training, and formalize training and investigations structure.

IMPLEMENTATION PLAN	TIMEFRAME
Ramapo's Director of Affirmative Action and Workplace Compliance/Title IX Coordinator shall: <ul style="list-style-type: none"><input type="checkbox"/> Identify criteria for pool of investigators.<input type="checkbox"/> Identify eligible persons for inclusion in investigators pool.<input type="checkbox"/> Deliver investigators training.<input type="checkbox"/> Implement formalized training and investigations structure.	Completed

3. CREATE A CENTRALIZED WEBSITE CONTAINING THE COLLEGE’S SEXUAL ASSAULT PREVENTION AND EDUCATION POLICIES, PROCEDURES, INFORMATIONAL CONTENT, AND RESOURCES

STRATEGIC INITIATIVE

Ramapo shall develop and publish a website through which members of the public and College community can easily obtain plainly-written information about the College’s sexual assault prevention and education policies, procedures, informational content, as well as on- and off-campus resources.

Reciprocal web links shall be established with other relevant campus offices, such as Public Safety, Student Affairs, and Human Resources.

The centralized website can be quickly and easily updated; therefore, it will help ensure information remains regularly updated. The website will also help facilitate College community engagement and education.

IMPLEMENTATION PLAN	TIMEFRAME
<input type="checkbox"/> Centralized website with plainly-written information about how to report an incident, links to current College policies, and on- and off-campus resources.	Completed

4. ADOPT LANGUAGE OF STAFFORD SEXUAL MISCONDUCT POLICY GOVERNING STUDENTS

STRATEGIC INITIATIVE

Adopt the draft “Sexual Misconduct Policy Governing Students,” which is compliant with the substantive and procedural requirements of Title IX and the Clery Act, as well as encompassing best practice. Adoption of this policy would also coordinate and centralize a number of policies that are currently contained within the Student Handbook and Code of Conduct into one stand-alone umbrella policy on Sexual Misconduct.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Receive former New Jersey State Attorney General Milgram’s recommendation on proposed policy.	Completed
<input type="checkbox"/> Legal review of the proposed policy in its entirety to identify and mitigate potential issues or conflicts.	Completed
<input type="checkbox"/> Implement new policy in Student Handbook.	Completed

5. UPDATE STUDENT CODE OF CONDUCT AND RELEVANT COLLEGE POLICIES

STRATEGIC INITIATIVE

In adopting the “Sexual Misconduct Policy Governing Students,” Ramapo shall strike language in the Student Code of Conduct that gives jurisdiction to the College Disciplinary Review Board. The Student Code of Conduct shall be additionally updated to reflect the terms and applicable definitions as noted in the Sexual Misconduct Policy Governing Students and refer to the full policy and resolution procedures and centralized website for additional information.

Ramapo shall update its definition of “student” consistent with best practices to outline when an individual is subject to the College’s policies and procedures.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Review bystander intervention and sexual assault training programs available nationally to determine which evidence-based model would be the best fit for the college campus environment and student trainees.	Ongoing
<input type="checkbox"/> The College’s Registrar shall review best practices and define, for Ramapo’s purposes, when a person becomes a student.	Completed
<input type="checkbox"/> The Student Code of Conduct shall be updated to reflect the terms and applicable definitions as noted in the Sexual Misconduct Policy Governing Students, as well as to include information about on- and off-campus resources.	Completed
<input type="checkbox"/> With adoption of the new Sexual Misconduct Policy governing students, the language in the Student Code of Conduct that gives jurisdiction to the College Disciplinary Review Board shall be struck.	Completed

6. CONTINUE TO IDENTIFY AND TRAIN ALL CAMPUS SECURITY AUTHORITIES AS DEFINED BY THE CLERY ACT

STRATEGIC INITIATIVE

Colleges must identify those individuals and organizations from which crime statistics are to be collected. These individuals/organizations are called Campus Security Authorities (CSAs). CSAs include all of the following:

- A campus police department or a campus security department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department (e.g. an individual who is responsible for monitoring the entrance into institutional property).
- Any individual or organization specified in an institution’s statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings.

Ramapo shall continue to send annual notices each December to all campus leaders (Deans, Directors, and Department Heads) to ensure the list of Campus Security Authorities, as defined by the Clery Act, remains current. The notices will articulate the definition of Campus Security Authority and request campus leaders’ assistance in identifying staff members within their areas of responsibility who also meet the definition.

Ramapo shall also conduct annual trainings for all CSAs consistent with recommendations contained in the U.S. Department of Education’s Handbook for Campus Safety and Security Reporting.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Public Safety shall continue to send annual notices each December to all campus leaders to notify them of definition of CSA and identify staff members whose responsibilities fit the definition.	Ongoing
<input type="checkbox"/> Public Safety shall arrange annual trainings for all CSAs consistent with the U.S. Department of Education’s Handbook for Campus Safety and Security Reporting.	Ongoing

7. CONTINUE TO IDENTIFY AND TRAIN ALL RESPONSIBLE EMPLOYEES AS DEFINED UNDER TITLE IX’S REGULATORY GUIDANCE

STRATEGIC INITIATIVE

Ramapo’s Title IX Coordinator, in conjunction with Human Resources and Employee Relations, shall continually review all employee positions at the College (paid or volunteer) annually to determine which positions shall be designated as a “Responsible Employee” position, as defined by Title IX. Employees holding such positions shall be added to a master list maintained by the College each academic year for review by the U.S. Department of Education.

A Responsible Employee would include any employee who has the authority to take action to redress harassment, who has the duty to report to appropriate school officials sexual harassment or any other misconduct by students or employees, or an individual who a student could reasonably believe has this authority or responsibility.

Responsible Employees shall continue to be trained annually. Responsible Employee training shall include, but not be limited to, the following:

1. What type of conduct constitutes sexual harassment.
2. How to identify warning signals that may need attention.
3. How to identify sexual harassment and sexual violence.
4. How to report sexual harassment and sexual violence to appropriate school officials.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Director of Affirmative Action and Workplace Compliance/Title IX Coordinator will work with Directors of Human Resources and Employee Relations to review employee positions and determine which meet the criteria of a Responsible Employee.	Ongoing
<input type="checkbox"/> The Director of Affirmative Action and Workplace Compliance/Title IX Coordinator shall maintain a master list of Responsible Employees.	Ongoing
<input type="checkbox"/> The Director of Affirmative Action and Workplace Compliance/Title IX Coordinator shall ensure all Responsible Employees are administered requisite trainings on an annual basis.	Completed May 2015; annually thereafter

8. REVIEW INCIDENT ASSESSMENT PROCESS TO ENSURE COMPLIANCE WITH CLERY ACT TIMELY WARNING NOTICE (TWN) PROVISIONS

STRATEGIC INITIATIVE

The Clery Act requires institutions to disclose crime statistics and assess crime for purposes of issuing Timely Warning Notices (TWN) for Clery-reportable offenses that occur in its “Clery Geography.” An institution’s Clery Geography means three types of (real) property: Campus, Non-Campus Buildings or Property, and Public Property.

- “Campus” is defined as buildings or property owned or controlled by the institution within the same reasonable contiguous geographic area and used by the institution in a manner related to the institution’s educational purpose, including residence halls and retail space used by food vendors.
- A “Non-Campus Building or Property” is any building or property owned or controlled by the institution for education-related purposes and that is not reasonably contiguous to the campus. This includes off-campus sports complexes, laboratories and the like, and includes property owned or controlled by a school’s recognized student organizations, such as fraternities or clubs.
- “Public Property” means property located within the same reasonable contiguous geographical area of the campus, like a sidewalk, street, or thoroughfare.

Ramapo shall review its incident assessment process to ensure the College issues Timely Warning Notices, as appropriate, in compliance with U.S. Department of Education requirements.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Public Safety shall assess its current process against the protocol provided by Stafford for reviewing incidents reported to CSA or local police to issue a Timely Warning.	Completed

9. ENSURE THAT THE TITLE IX COORDINATOR, DEPUTY COORDINATORS, INVESTIGATORS AND ALL RELEVANT PERSONS RECEIVE ANNUAL TRAINING IN COMPLIANCE WITH THE CLERY ACT AS AMENDED BY VAWA

STRATEGIC INITIATIVE

Ramapo shall institute a formalized annual training regimen for the Title IX Coordinator, all Deputy Coordinators, all Investigators, and all persons involved in the resolution and appeal of a complaint of sexual assault, domestic violence, dating violence, and stalking, in compliance with the Clery Act as amended by the Violence Against Women Reauthorization Act (VAWA).

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> President’s Office to ensure that Director of Affirmative Action and Workplace Compliance/Title IX Coordinator, continues to receive annual training.	Completed May 2015; annually thereafter
<input type="checkbox"/> Director of Affirmative Action and Workplace Compliance/Title IX Coordinator to establish procedures to ensure that all employees required to receive annual training complete such training.	Completed
<input type="checkbox"/> President’s Cabinet to receive annual report on training activities.	Completed Dec. 2015; annually thereafter

10. REVIEW PUBLIC SAFETY GENERAL ORDER RELATED TO ROLE IN RESPONSE TO REPORTS OF SEXUAL MISCONDUCT

STRATEGIC INITIATIVE

Ramapo shall ensure that the existing General Order (GO) that specifically addresses Public Safety’s role in response to reports of sexual misconduct is routinely reviewed. As part of this protocol, Ramapo shall define expectations of Public Safety officers with regard to preliminary report, the thoroughness to which reports are expected, interim measures that can be taken when the Title IX Coordinator is unavailable to ensure the safety of complainants, and ensure that any complainant reporting to Public Safety receives the Written Notice of Rights as required by the Clery Act as amended by the Violence Against Women Act.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Public Safety shall review the current General Order, which was last reviewed in March 2015, to ensure it meets criteria outlined by the third-party consultants.	Completed

11. IDENTIFY CONFIDENTIAL VICTIM ADVOCATES AMONG EXISTING PROFESSIONAL COUNSELORS

STRATEGIC INITIATIVE

Ramapo shall identify, among its licensed professional counselors, those to serve as confidential victim advocates who can provide emergency and ongoing support.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Ramapo shall disband the Assault Contact Team.	Completed
<input type="checkbox"/> Ramapo shall identify licensed professional counselors as confidential victim advocates.	Completed

12. UPDATE AND ESTABLISH MEMORANDA OF UNDERSTANDING WITH LAW ENFORCEMENT AUTHORITIES TO OUTLINE AND INFORM THEM OF THE COLLEGE’S REQUIRED RESPONSES TO SEXUAL ASSAULT AS REQUIRED BY THE U.S. DEPARTMENT OF EDUCATION

STRATEGIC INITIATIVE

Ramapo’s Memorandum of Understanding with the Mahwah Police Department will outline and inform the police department about the College’s required responses to sexual assault. The Memorandum shall further provide for enhanced communication and collaboration between Ramapo College and the Mahwah Police Department regarding sexual assault prevention and education.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Public Safety shall coordinate with Mahwah Police Department concerning the MOU.	Pending approval by Mahwah PD
<input type="checkbox"/> Public Safety shall develop an MOU with the Bergen County Prosecutor’s Office.	Pending approval by Bergen County Prosecutor

13. SYSTEMATICALLY REVIEW ENFORCEMENT ACTIVITIES RELATED TO SEXUAL ASSAULT AND ALCOHOL

STRATEGIC INITIATIVE

Ramapo shall review its enforcement practices related to sexual assault and alcohol policies to ensure transparency, appropriate treatment of all students involved, protection of survivors and/or victims' confidentiality, and accountability of offenders.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Ramapo shall continue to hold monthly meetings of Residence Life, Student Conduct, and Public Safety to review enforcement activities and identify and address any disparities.	Ongoing
<input type="checkbox"/> Ramapo shall restructure reporting lines so that Public Safety transfers to the Division of Enrollment Management and Student Affairs.	Completed

14. REFINE RESIDENT ASSISTANTS' ROLES AND RESPONSIBILITIES, AND PROVIDE ADDITIONAL TRAINING

STRATEGIC INITIATIVE

Resident Assistants (RAs) play an important role on campus and are designated as “first responders” for student housing issues.

Ramapo shall update the defined roles and responsibilities for RAs who shall also receive additional training on situation de-escalation and crisis intervention.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Define separation of duty between RAs and Public Safety and when Public Safety will respond.	Completed
<input type="checkbox"/> Expand number and frequency of RAs “rounds.”	Completed
<input type="checkbox"/> Provide RAs with additional training on de-escalation and crisis intervention.	Ongoing

15. PUBLIC SAFETY INVESTMENTS AND ENFORCEMENT INITIATIVES

STRATEGIC INITIATIVE

Ramapo has increased Public Safety Officer positions from 28 to 31.5. The College shall achieve its target of 34 Public Safety Officers in the fall 2015 semester. At the same time, Ramapo shall enhance its enforcement of policies governing large outdoor gatherings among students on campus.

Separately, Ramapo Public Safety Officers shall be trained on community interaction to strengthen the student/enforcement relationship.

IMPLEMENTATION PLAN	STATUS
<input type="checkbox"/> Public safety officers to be trained on community interaction to strengthen the student/enforcement relationship.	Ongoing
<input type="checkbox"/> Public Safety shall hire additional officers to meet target of 34 positions.	Completed
<input type="checkbox"/> The College shall continue to enforce its policy of interim and permanent suspension from residence of student hosts who have disregarded College alcohol and social gathering policies.	Ongoing

CONCLUSION

Ramapo: Advance represents our long-term commitment to continually advance campus safety at Ramapo College of New Jersey.

Our plan is ambitious and its timeline is aggressive; however, we firmly believe it is eminently achievable. Every member of Ramapo College is a stakeholder in the matter of campus safety and our dialogue on these matters is sure to continue. As with all significant undertakings, some delay and adjustment is unavoidable. We will take care to post updates online at www.ramapo.edu/advance.

We wish to acknowledge and thank our trustees, law enforcement partners, and the students, faculty, staff, administrators, and volunteers who have given so much of themselves to the purpose of keeping our campus safe. Your service is deeply appreciated, and we look forward to a continuing partnership with you as we move forward to advance this plan.

Questions or concerns may be sent to:

By Mail:

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