



CRR: Housing- Title IX (All Campuses)

Compliance Risk Areas

Compliance Risk Areas	Related Governing Laws, Rules, Regulations, or University Policies
<ul style="list-style-type: none">• Generally. A recipient shall not, on the basis of sex, apply different rules or regulations, impose different fees or requirements, or offer different services or benefits related to housing, except as provided in this section (including housing provided only to married students).• Housing provided by recipient.<ul style="list-style-type: none">○ A recipient may provide separate housing on the basis of sex.○ Housing provided by a recipient to students of one sex, when compared to that provided to students of the other sex, shall be as a whole:<ul style="list-style-type: none">▪ Proportionate in quantity to the number of students of that sex applying for such housing; and▪ Comparable in quality and cost to the student.• Other housing.<ul style="list-style-type: none">○ A recipient shall not, on the basis of sex, administer different policies or	<ul style="list-style-type: none">• Authority: Secs. 901, 902, Education Amendments of 1972, 86 Stat. 373, 374

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<p>practices concerning occupancy by its students of housing other than provided by such recipient.</p> <ul style="list-style-type: none">○ A recipient which, through solicitation, listing, approval of housing, or otherwise, assists any agency, organization, or person in making housing available to any of its students, shall take such reasonable action as may be necessary to assure itself that such housing as is provided to students of one sex, when compared to that provided to students of the other sex, is as a whole:<ul style="list-style-type: none">▪ Proportionate in quantity and▪ Comparable in quality and cost to the student.○ A recipient may render such assistance to any agency, organization, or person which provides all or part of such housing to students only of one sex.	
<ul style="list-style-type: none">• During and after the process of investigating a complaint and conducting a campus disciplinary procedure, the assistance of campus personnel, in cooperation with the appropriate law enforcement authorities, at a sexual assault victim's request, in shielding the victim from unwanted contact with the alleged assailant, including transfer of the victim to alternative classes or to alternative	<ul style="list-style-type: none">• https://www.revisor.mn.gov/statutes/?id=135A.15

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college-owned housing, if alternative classes or housing are available and feasible.	
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Cost of Compliance Measurement Questions

1. How many full-time employees (FTEs) are dedicated to compliance-related activities in this area? (If this compliance work in satisfying the Title IX Housing requirements does not take a full-time employee, please add up the small % of time to report here. Please do not include time that is spent processing applications.)
2. What is spent annually, on average, to perform the compliance-related activities conducted by this unit? Please include only those items that require the purchase of goods or services from an outside entity such as outside consulting services, equipment purchases, non-routine supplies, or fees.
3. Please list all training required to maintain University compliance in this subject area. For each training requirement.
 - a. Identify the primary source of the requirement as (1) federal or state law, (2) administrative regulations, or (3) University policy. (e.g., Conflict of Interest training is required under federal code of federal regulations for investigators conducting research funded by a Public health Service agency)
 - b. Identify category (ies) of employees (e.g., faculty, P&A, etc.) required to take the training. (You may include students if their work is associated with ensuring compliance with the Title IX Housing regulation.) Estimate the number of individuals in each category required to take the training.
 - c. Identify the frequency (e.g., quarterly, annually) and the length of the training (e.g., 1.5 hours).
4. Estimate the number of employees campus-wide who are subject to the compliance requirements in this area (e.g., assignment of housing).
5. Excluding time required to meet training requirements addressed in Question 3 above, please estimate the time required annually for these employees to comply with other compliance requirements (e.g., record keeping, monitoring, testing, reporting).

General compliance question(s)

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1. Are there emerging risks in this area? If yes, please explain.
2. Estimate the number of allegations of misconduct (violation of law, rule, regulation or University policy) that are received annually related to Title IX Housing, excluding those allegations filed through the UReport system.

Housing applications of all students and assignments

% of applicants to % of assignments by gender

1. Please complete the following table related to applications for housing.

Applications for Housing in University Managed Housing Properties

Year	Total # of applicants	Total # female applicants	% female applicants	Total # male applicants	% male applicants
2014-15					
2015-16					
2016-17					

2. Specify the number of students, out of the totals shown above, who were assigned University housing and provide in the table below.

Assigned Housing in University Managed Housing Properties

Year	Total # of students assigned	% females assigned	Total # females assigned	% males assigned	Total # males assigned
2014-15					
2015-16					
2016-17					

3. Who is responsible for assigning students to University housing?
4. How are applicants who have not specified a gender handled when complying with the requirement to assure that housing, as provided to student of one sex, are proportionate in quantity and of comparable quality and cost to the student, as compared to student of the other sex?
5. Does any other party review the housing assignments to ensure that no assignments violate IX Housing?

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6. How is the quality of housing provided for particular genders evaluated?
7. How is compliance with assigning housing monitored? How frequently does the monitoring occur?
8. What are the typical noncompliance issues found and how are they corrected?
9. How is compliance in this area reported to senior leadership (vice president or equivalent), and how frequently?

Housing rules and regulations

Confirm not based on gender, except for married student housing. We don't have a printed handbook. All housing rules and regulations are on the Housing & Residential Life website.

1. Do any of the housing rules or regulations impact students of one sex differently than students of the other sex?
2. How frequently does someone review the housing rules/regulations to ensure that the impact by gender is not different?
3. What are the typical noncompliance issues found and how are they corrected?
4. How is compliance in this area reported to senior leadership (vice president level and equivalent), and how frequently?

Housing costs

1. Are housing costs comparable, regardless of gender?
2. Who reviews the housing costs (monitors) and how frequently does this occur?
3. What noncompliance issues are typically found and how are they corrected?
4. How is compliance in this area reported to senior leadership (vice president level or equivalent), and how frequently?

Protecting victims of a sexual assault from unwanted contact with the alleged assailant

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1. On average, how many residents annually have requested assistance related to protection from unwanted contact with an alleged assailant in housing? Who is responsible for receiving, and addressing, these requests?
2. What accommodations were made to respond to these requests?
3. What oversight is in place to ensure that the requests are heard and action taken where possible?
4. How is compliance in this area reported to senior leadership (vice president or equivalent), and how frequently?

SAMPLE

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