

**House Higher Education Committee**  
**March 20, 2025**  
**Public Hearing**  
**HB 3731 – Sexual Misconduct Reporting**

Chair Hudson and Members of the House Higher Education Committee,

On behalf of the Oregon Community College Association and the 17 Oregon community colleges we represent, I am writing to share comments on HB 3731 and the proposed -1 amendments. We appreciate the recent outreach from Rep. Hartman's office and her staff's willingness to solicit feedback on the proposed changes to existing reporting requirements. As the committee considers HB 3731, we urge that any changes to existing reporting requirements simplify reporting and ensure annual reports add value to advocacy around the resources needed to address student and employee supports related to sexual misconduct.

While we understand the need for reporting information related to Title IX and cases of sexual misconduct, we also want to ensure that we strike a balance between student and employee confidentiality and accountability, and advocate for resources to support this work. We share the belief that transparency around sexual misconduct garnered through institutional reports will lead to increased advocacy for funding these efforts at our colleges and universities.

The challenges to community colleges around Title IX and sexual misconduct reporting are complex due to limited staffing, limited resources, and the lack of housing on most campuses. Community colleges' open access missions mean that community college staff are working hard to meet these expectations, and support our most traditionally underserved students, with very lean resources. Most of our colleges' Title IX coordinators have multiple roles and time spent on reporting takes them away from providing support to students and employees because they do not have institutional researchers or offices with the capacity to help track this data. This is true at all community colleges who are working with key community partners to provide supportive measures and complete investigations in a timely manner, so students have the tools to successfully pursue their educational goals.

Despite these resource challenges, community colleges are doing amazing and important work to support students and change the culture on campus around sex-based discrimination. At one college the Title IX coordinator offers personalized workshops to departments and student groups. One partnership that has flourished over the past several years is with their athletic department. This has

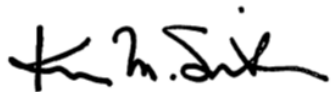
led to the creation an athletic program that actively educates athletes and coaches about sex-based discrimination and responds appropriately to reports through a trauma-informed perspective. Through these workshops, faculty have also become more engaged in working with the coordinator to find the best ways to support their students, such as when the faculty member learns that a student is facing a situation like domestic violence and has fallen behind in class. The consistency of the support their office provides students has strengthened rapport with faculty colleagues and academic deans.

We support the addition of a narrative section in the reports to allow institutions to explain changes in data trends, discuss supportive measures provided and potential gaps, and how the institution is working to address sexual misconduct on their campuses. We remain concerned, however, about some of the additional reporting requirements included in the -1 amendments to HB 3731 and the difficulty in obtaining some of this information. One example is the addition of reporting requirements around law enforcement investigations involving non-students, non-employers, and unknown individuals. Most community colleges do not have on campus law enforcement offices and have found that local law enforcement is not willing to share information related to sexual misconduct investigations with our institutions. We also have concerns about the list of supportive measures that will be required by changes to subsection (h). We understand that the intent is to create general categories of supportive measures, and we urge that the categories be defined broadly enough to protect student and employee confidentiality.

This feedback was shared by college and university Title IX coordinators at a meeting earlier this week with Rep. Hartman's staff and we understand they are willing to consider clarifying language to make sure annual reporting does not add to the complexity and challenging nature of this work on our campuses.

We look forward to working with you and the bill's sponsors to use the information garnered from annual reporting to leverage additional resources to support and advocate for survivors on our campuses.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen M. Smith", written over a horizontal line.

Karen M. Smith  
Senior Policy Advisor & General Counsel