



SOUTHWESTERN UNIVERSITY

MEMORANDUM

TO: Southwestern University Board of Trustees

FROM: Dr. Laura Skandera Trombley
President and Chief Executive Officer

DATE: October 22, 2025

RE: Chief Executive Officer Reporting Requirements under
Tex. Educ. Code § 51.253(c) (Texas Senate Bill 212)

Under Tex. Educ. Code § 51.253(c), the institution's Chief Executive Officer (CEO) is required to submit, at least once during each fall or spring semester, a report to the institution's governing body and to post the report to the institution's website. This report may not identify any person and must include:

1. The number of reports of sexual harassment, sexual assault, dating violence, and stalking received from employees required to report such incidents under Tex. Educ. Code § 51.252;
2. The number of investigations conducted as a result of such reports;
3. The disposition, if any, of any disciplinary processes arising from those reports;
4. The number of reports for which the institution determined not to initiate a disciplinary process, if any; and
5. Any disciplinary actions taken under Tex. Educ. Code § 51.255.

For the purpose of complying with the CEO's reporting requirements under Tex. Educ. Code § 51.253(c), I am submitting the attached report (Appendix A) and supplemental information (Appendix B).

This report shows that of the 41 reports¹ made to the Title IX Coordinator as required by Tex. Educ. Code § 51.252 between July 1, 2024, and June 30, 2025, a total of 16 reports were made by confidential employees pursuant to Tex. Educ. Code § 51.252(c) and therefore could not be investigated. Of the 25 non-confidential reports received, one resulted in an investigation; however, the respondent employee resigned before the

¹ When identifiable, duplicate reports were consolidated into a single case number and counted as one report in the data in Appendix A.

conclusion of the formal resolution process.² The remaining 24 reports did not result in an investigation.³

Regarding Table 2, no employees were alleged to have failed in their reporting duties or to have submitted a false report during the 2024-2025 academic year.

Please note that Southwestern University policy includes sexual misconduct categories not subject to reporting requirements under Tex. Educ. Code § 51.252.⁴ Reports received by the Title IX Coordinator outside the scope of Tex. Educ. Code § 51.252 have been omitted for the compliance purposes of this specific report.⁵

² Southwestern University responds to all reported allegations of sexual misconduct that violate institutional policy or the law. Student and employee complainants have the option to receive supportive measures, regardless of whether they choose to submit a formal complaint. In some cases, a complainant and respondent may agree to an alternative resolution process in lieu of a formal grievance process. For purposes of this report, instances where no formal complaint is submitted or where the parties choose an alternative resolution process are not considered to involve investigations.

³ The rationale for not initiating an investigation may include (but is not limited to): insufficient information to investigate; the respondent's identity was unknown or not reported; the respondent was not affiliated with the institution; the complainant did not wish to submit a formal complaint; or the parties agreed to the alternative resolution process.

⁴ Namely, domestic violence (as required by federal law), relationship abuse, sexual exploitation, and inappropriate conduct of a sexual nature. For more information and full definitions, please visit southwestern.edu/titleix.

⁵ For example, reports made by students or non-employees are not included. This report also does not contain reports in which the incident, as alleged, does not constitute "sexual harassment," "sexual assault," "dating violence," or "stalking" as defined in Tex. Educ. Code § 51.251. It is the responsibility of the Title IX Coordinator or Deputy Title IX Coordinator to assess each report received to determine whether it is properly included in this report.

APPENDIX A
Annual Title IX Coordinator Report
2024-2025 Academic Year¹

Table 1. Alleged conduct reported by employees under Tex. Educ. Code § 51.252

Reports received under Tex. Educ. Code § 51.252 by quarter	
Q1: July 1, 2024 – September 30, 2024	10
Q2: October 1, 2024 – December 31, 2024	12
Q3: January 1, 2025 – March 31, 2025	12
Q4: April 1, 2025 – June 30, 2025	7
Total reports received for 2024-2025 academic year	41
Number of confidential reports received ²	16
Number of reports resulting in an investigation	
Pending conclusion of grievance process	0
Concluded, no finding of policy violation	0
Concluded, disciplinary sanctions imposed on employee	0
Concluded, disciplinary sanctions imposed on student	0
Concluded, employee resigned	1
Concluded, student withdrew	0
Number of non-confidential reports for which no investigation was initiated	24

Table 2. Alleged failure to report or false report under Tex. Educ. Code § 51.255(a)

Reports received that included allegations of an employee's failure to report or submission of a false report	0
Disciplinary action taken	0
a. Employee terminated (or employee resigned prior to termination)	0
b. Institution intends to terminate (absent employee resignation)	0

The University did not receive any reports of alleged failure to report or alleged submission of false reports under Tex. Educ. Code § 51.255(a) during this time period.

¹ For purposes of this report, the 2024-2025 academic year began on July 1, 2024 and ended on June 30, 2025.

² Confidential reports are a subset of the total number of reports received. These reports include the type of incident disclosed to the reporter but no additional identifying information, pursuant to Tex. Educ. Code §§ 51.252(c), (c-1). Counselors, medical staff, and the institution's chaplain are designated as confidential employees.

APPENDIX B **Supplemental Information**

Employee Reporting Requirements Under Tex. Educ. Code § 51.252

Effective September 1, 2019, under [Tex. Educ. Code § 51.252](#) (Texas Senate Bill 212), all Southwestern University employees (except an employee who is a student enrolled at the institution) are required to promptly make a report to the Title IX Coordinator or a Deputy Title IX Coordinator when, in the course and scope of employment, the employee witnesses or receives information about an incident:

- (1) That the employee reasonably believes constitutes sexual harassment, sexual assault, dating violence, or stalking; and
- (2) That is alleged to have been committed by or against a person who was a student enrolled at SU or an employee of SU at the time of the incident.

Under SB 212, sexual harassment means unwelcome, sex-based verbal or physical conduct that:

- (1) In the employment context, unreasonably interferes with a person's work performance or creates an intimidating, hostile, or offensive work environment; or
- (2) In the education context, is sufficiently severe, persistent, or pervasive that the conduct interferes with a student's ability to participate in or benefit from educational programs or activities at a postsecondary educational institution.

Sexual assault, dating violence, and stalking, have the same meanings as they do under the Clery Act, [20 U.S.C. § 1092\(f\)](#).

An employee's report must include all known information concerning the incident, including whether an alleged victim has expressed a desire for confidentiality in reporting the incident, except that:

- (1) A report made by an employee designated by SU as a person with whom students may speak confidentially concerning sexual harassment, sexual assault, dating violence, or stalking shall state only the type of incident reported and may not include any information that would violate a student's or employee's expectation of privacy;
- (2) A report made by a campus peace officer who receives such information from an alleged victim who chooses to complete a pseudonym form under the Texas Code of Criminal Procedure shall state only the type of incident reported and may not include the victim's name, phone number, address, or other information that may directly or indirectly reveal the victim's identity;
- (3) An employee is not required to report an incident in which the employee was a victim of sexual harassment, sexual assault, dating violence, or stalking; and
- (4) An employee is not required to report an incident under SB 212 when information is received due to a disclosure made at a sexual harassment, sexual assault, dating violence, or stalking public awareness event sponsored a postsecondary institution or affiliated student organization.

An employee who fails to properly report an incident, or who knowingly submits a false report, will be terminated from employment in accordance with the University's disciplinary procedures, as required by [Tex. Educ. Code § 51.255](#), and may result in criminal prosecution.

Title IX Coordinator Reporting Requirements Under Tex. Educ. Code § 51.253(a)

Additionally, under [Tex. Educ. Code § 51.253\(a\)](#), the Title IX Coordinator is required to submit to the President of the University, not less than once every three months, a written report regarding reports of sexual harassment, sexual assault, dating violence, and stalking received from employees required to report such incidents under SB 212, including information regarding the investigation and disposition of those reports.

The Title IX Coordinator also provides this annual report to the President and the Board of Trustees each year during the fall semester.

Alleged Conduct Reported by Employees Under Tex. Educ. Code § 51.252

When a report is made, the Title IX Coordinator contacts the harmed party (called the "complainant") to make that person aware of their rights and options under the law and to offer supportive measures and resources. A complainant may choose to submit a formal complaint, after which the parties may agree to an alternative resolution process¹ or the matter will proceed to a formal resolution process.

If the complainant chooses not to submit a formal complaint or if the parties agree to an alternative resolution process, this annual report will not list the matter as an investigation.

If the complainant submits a formal complaint and the matter proceeds to a formal resolution process, this annual report will reflect the status of the investigation or conclusion rendered by the hearing officers or decision maker, as described in the [Policy Prohibiting Sex Discrimination and Sexual Misconduct](#).

Alleged Conduct Under Tex. Educ. Code § 51.255(a)

The Title IX Coordinator will include in this annual report any instances where an employee was terminated, or where the University intends to terminate the employee, due to the employee's failure to properly report an incident or to have knowingly submitted a false report.

¹ Note that the alternative resolution process is not available in all situations. For example, the University does not allow alternative resolution to be utilized when the respondent is a non-student employee accused of committing prohibited conduct against a student. See the [Policy Prohibiting Sex Discrimination and Sexual Misconduct](#) for more information.