April 7, 2011

University Council

Executive Committee

The following action item from the Ad Hoc Committee on Sexual Harassment was approved by the University Council Executive Committee at the April 7, 2011 meeting to be placed on today's University Council agenda.  The University Council is being asked to vote in favor or against endorsing this report.  By voting to endorse this report, University Council would be voting to accept the report into the record of University Council actions and would be expressing their support for the administration to move toward implementation of the recommendations in the report. Details of how to implement some of the recommendations will need to be developed by the administration, so accepting this report does not implement any changes in University policy.

Respectfully Submitted,

Jeff Dorfman, Chair

Executive Committee

Tricia Lootens, Chair (Faculty, Franklin College)

Kecia Thomas (Faculty, Franklin College)

Mark Brown (Faculty, CAES)

Shannon Scott (Staff, ICLE)

Tony Hughey, (Staff, Veterinary Medicine)

Danny Glassman (Graduate Student, Education)

21 March 2011

**Report of the Ad Hoc Committee on Sexual Harassment**

**Establishment, Charge, and Process:**

On 13 August 2010, Adrian Childs, as Chair of the Executive Committee of University Council, constituted an ad hoc Committee on Sexual Harassment. In accordance with University Council decisions reached the preceding spring, he charged that committee with “reviewing UGA’s ‘procedures for handling allegations of sexual harassment,’ with a focus on those developed following the appointment of the University Ombudspersons in 2008.” The review’s stated purpose is “to examine and improve the effectiveness of procedures currently in place.”

In fulfillment of its charge, the Committee interviewed the available ombudspersons, Shay Davis Little and Kathryn M. Chetney, as well as J. Stephen Shi and Janyce Dawkins of the Equal Opportunity Office (EOO). We also reviewed redacted EOO files on all sexual harassment cases investigated and closed between 1 October 2008, when the EOO undertook responsibility for handling such cases, and the time of our review.

**Background:**

The Non-Discrimination and Anti-Harassment: Official Policy Statement, adopted 5 August 2003, and since revised, effective 17 February 2011, is the primary document establishing the procedures for handling sexual harassment complaints. The Non-Discrimination and Anti-Harassment Policy (“NDAH Policy”; see http://www.uga.edu/eoo/pdfs/NDAH.pdf) declares the University’s non-toleration policy towards discrimination or harassment, as well as its commitment to investigate all allegations and impose discipline on violators.

On 21 March 2008, in response to concerns surrounding the effectiveness of that policy’s enforcement, President Michael Adams issued a memorandum entitled, “Update on Non-Discrimination and Anti-Harassment Policy” (the “NDAH Update”; see http://www.uga.edu/resources\_for\_women/memo3.21.08.html). The NDAH Update revised and supplemented the procedure in several important ways. The report that follows addresses those changes which have been made, while proposing that the NDAH Update might still serve as a resource for considering changes to come.[[1]](#footnote-1)

**Public Education:**

As the President’s Update of 2008 states, “everyone on this campus needs to know what the [NDAH] policy covers and how to report alleged violations to the appropriate office.” Since that update was issued, largely through the efforts of the EOO, UGA has made significant strides toward better community education around questions of sexual harassment. Janyce Dawkins of the EOO and the University Ombudspersons now actively pursue opportunities to speak on campus, and these efforts have clearly been welcomed. Independent training programs have also continued to work within individual colleges and other administrative units; and the NDAH Website testifies to the university’s emphasis on the policy.

This having been said, the committee’s sense is that UGA has yet to achieve the President’s goal. Sexual harassment training at UGA remains largely ad hoc. Facilitators from the Ombudspersons Program (OP), the EOO, and other administrative units schedule and offer such training independently and in addition to other duties; and they do so without explicit, centralized coordination. Indeed, certain current UGA sexual harassment trainings reportedly fail even to acknowledge the existence of the OP. Beyond this, the context for much of this sexual harassment training remains reactive, with trainings instituted only in response to specific violations. At best, this situation may convey the impression that knowledge on how to avoid sexual harassment is not essential. (As one person interviewed noted, “What does it say, when the whole university has to undergo training with respect to dangerous chemicals, but there is no consistent attempt to ensure that entering employees, be they faculty, staff, administrators, or student workers, know how to avoid and report sexual harassment?”) At worst, it may convey the impression that receiving sexual harassment training is itself a punishment. Where unit-wide training is required in response to a given incident, such training may even spark resentment toward successful complainants, from busy supervisors and/or colleagues who believe that had the complainant not “caused trouble,” they themselves would not be required to attend “one more waste-of-time meeting.” Besides seeming likely to exert a negative impact on the general climate around sexual harassment at UGA, gaps in public education also seem clearly related to a major challenge that EOO officers report continuing to face: that is, the ongoing need to assess and potentially honor alleged harassers’ claims that they had no idea their behavior was in violation of NDAH policy. Until university community members receive sexual harassment training across the board, ideally as a matter of course, this challenge will remain in force.

*Recommendation 1: Require explicit, active training for all administrators, faculty, staff, and students.*

*Note: this change has been proposed by the EOO.*

*Recommendation 2: Develop such training in active consultation with representatives of the OP, the EOO, and appointed UGA faculty and staff who already count sexual harassment training among their professional areas of expertise.*

*Recommendation 3: Designate and fund a single administrative unit to act as coordination point for ongoing, pro-active sexual harassment training across campus. This unit’s duties would include working with representatives of the OP, EOO, other current sexual harassment trainers, and UGA specialists in the field, so as to develop, advertise, and oversee both the content and scheduling of sexual harassment trainings.*

*Note: Under the NDAH Update, the EOO is technically responsible for coordinating general NDAH education. We are not sure whether relocation would be wise, given the scope of this project. What does seem clear is that educating a community the size of UGA cannot be an “add-on”: more sustained, focused allocation of resources, energy, and expertise will be required.*

**Effectiveness of the UGA Ombudspersons Program (OP):**

Thanks to financial support from the President’s Office, as well as coordination efforts by the EOO, UGA’s current ombudspersons have been able to benefit from invaluable training, including that offered by the International Ombudsman Association (“IOA”: see <http://www.ombudsassociation.org/>). As its reports suggest, the OP has proved to be an extremely effective complaint-handling mechanism. Highly skilled and deeply dedicated to their office’s broader mission, UGA Ombudspersons already serve important functions within the university as a whole. As members of the UGA community, we applaud the President’s decision to experiment with establishing an OP. We believe the experiment has been a success so far; we hope that it will continue.

With respect to sexual harassment issues, however, it seems clear that the experiment is still very much under way. Reconfiguration and reinforcement will be necessary, if UGA is to realize the program’s full potential. Since its formation in 2008, the OP has received and reported very few complaints of sexual harassment. Conversations with the Ombudspersons, EOO officers, and other university members; readings on the philosophy of OPs in general; and increased familiarity with such programs’ workings on other campuses have led us to conclude that this situation is the result of problems outlined below. At the same time, such research has convinced us, (to some committee members’ surprise), that continued work on establishing an effective OP may well prove instrumental to developing successful enforcement of policies against sexual harassment at UGA.

University members who are subjected to sexual harassment often fear retaliation. In such instances, they may hesitate even to explore their options, without strong assurance of being able to do so under conditions of absolute confidentiality. Moreover, even should they decide to pursue a complaint, they may require particularly sensitive, sustained assistance in negotiating the psychological as well as professional challenges involved. According to the NDAH Update, the purpose of the OP was to address these needs, providing a confidential access point for information and assistance:

The University will appoint and train three ombudspersons to serve as contacts for students, faculty, and staff, *to whom initial reports of alleged NDAH violations or questions regarding other concerns may be brought confidentially*: an ombudsperson for students in the Division of Student Affairs; an ombudsperson for faculty in Academic Affairs; and an ombudsperson for staff in Human Resources. These individuals will help guide people through the sometimes confusing process of resolving conflicts or reporting violations at this large, complex research institution.  The scope of work of these individuals, who will be trained in University, University System, state, and federal policies and procedures, will be *to provide informal and confidential assistance to persons with issues or concerns, advising members of the community about where to turn and what procedures to follow should they wish to advance a complaint.*The names, duties, and contact information for the ombudspersons will be posted online and discussed at appropriate information sessions during the course of the year with faculty, students, and staff. (emphasis added)

Such responsibilities would have been consistent with the standards and best practices of the International Ombudsman Association (IOA), which observes:

* that the ability to have confidential communications that do not constitute “notice” to the organization is essential to the effective functioning of an Ombudsman Office.
* that it is the “off-the-record” aspects of the office that lead people who use the Ombudsman to do so before taking any official or formal action.
* that the Ombudsman Office enables people to come forward with an issue when they might otherwise hesitate to do so for fear of retaliation.
* that where issues cannot be confidentially raised, they may not be raised at all, thereby depriving the organization of an opportunity to address issues and rectify misconduct that has not yet surfaced through other channels.

Unfortunately, this initial structuring of OP duties was never implemented as directed. As UGA policy now stands, the OP is formally required to limit complainant confidentiality, by reporting any information indicating a possible violation of the NDAH Policy directly to the NDAH Officer. The OP website summarizes this restriction as follows:

All communications related to an allegation, concern or other issue reported to Ombudspersons will be kept confidential to the extent legally permissible and consistent with maintaining the safety and public welfare of the campus. *In cases where information reported to an Ombudsperson indicates that there may be a violation of the University's non-discrimination and anti-harassment policy,* (<http://www.uga.edu/eoo/pdfs/NDAH.pdf>), *the Ombudsperson will be obligated to report that information to the NDAH Officer in keeping with that policy.* (emphasis added)

The result of this policy has been to prevent the OP from being able to do its work, where sexual harassment is concerned. Because ombudspersons, like supervisors, are now required to report any indications of an NDAH violation to the NDAH Officer, prospective complainants now face one of three choices: (1) ignore the offending behavior; (2) directly confront the perceived offender; or (3) report the offending behavior to the NDAH Officer, either directly or indirectly, through the OP. As we understand current policy, even to approach the OP is hence to risk triggering an investigation that may be pursued without regard to one’s own wishes. Ombudspersons informally report at least one recent instance in which a prospective complainant, having been informed of this situation on the phone, hung up. It is easy to imagine that others, having read the OP website, go no further. By not providing a properly constituted OP, UGA is failing to uncover and address the full extent of sexual harassment on campus.

We understand that the university’s decision to revise its initial conception of the OP, thus constituting the program as a legal “point of notice,” was not lightly undertaken. Still, we believe that this decision should now be reversed, so as to bring the university into compliance with IOA standards. In this context, it seems worth noting that universities throughout the country have established OPs not designated as offices of “notice”: that is, capable of serving as fully confidential access points for sexual harassment complaints and reports. Within the University System of Georgia, such OPs already exist at Clayton State, Georgia Tech, Georgia State, Kennesaw State, and West Georgia.

Correcting this violation of the OP’s central requirements seems all the more important, given a serious structural conflict now facing EOO officers. As EOO officers themselves are acutely aware, complainants who are frightened may stand in need of a high degree of moral support, both in deciding whether to pursue charges and in negotiating the demands of that action, should they decide to do so. At the moment, the task of offering such support falls on the Equal Opportunity Officers. Given the EOO’s responsibility, both for attempting to pursue objective investigations and for deciding on complaints’ final disposition, expecting the EOO to offer complainants ongoing encouragement and moral support is neither practical nor appropriate. EOO officers are pushed to exceed the limits of their formal responsibilities, while complainants are forced to rely on the support of university lawyers who are, by definition, not necessarily on their “side.” If the university is to eliminate this source of damaging and unnecessary stress, both on the EOO and on committed or potential complainants, it will need to provide complainants support elsewhere. The OP, if properly constituted, supported, and publicized, would seem to us to be a perfect place in which to do so.

The role of Ombudspersons, on a national level, is to act as independent agents, operating under a formal charter and reporting only to the highest levels of administration. UGA Ombudspersons, who continue to operate without a formal charter, now fulfill their OP obligations in addition to other professional duties, while reporting to the EOO. They work, that is, without important legal protections, in positions that remain potentially subject to the demands of specific administrative units and supervisors. The result can be vulnerability to actual or perceived conflicts of interest. Sensitive to such dangers, UGA Ombudspersons have already shifted complainants from one Ombudsperson to another, in instances in which potential conflicts have arisen. Still, especially given UGA’s model of assigning each Ombudsperson either to student, faculty or staff concerns, this process is not ideal.

*Recommendation 1: Establish a UGA Office of the Ombudsperson in accordance with the International Ombudsman Association’s Standards of Practice and Best Practices, consistent with the American Bar Association Standards, and as modeled by other University System of Georgia ombudsman offices. Provide the OP with a Charter that clarifies its function and role within the University; design the OP to report directly to the highest levels of the University administration; define the OP, expressly, as distinct from an office of “notice” and provide for confidentiality. Move towards reconceiving OP positions, so that Ombudspersons can become as institutionally independent as possible.*

*Recommendation 2*: *Revise the NDAH Policy either to exempt ombudspersons from the reporting requirement or to clarify in the Policy or in the Charter that the ombudspersons are not administrators or supervisors for purposes of the Policy.*

*Recommendation 3*: *Revise the Dispute Resolution Procedures so that (1) the Office of Ombudsperson replaces the “Dispute Resolution Coordinators,” and is permitted under these procedures to use its discretion in the informal management and reporting of disputes involving allegations of sexual harassment in accordance with the preferences of the complainant.*

**Effectiveness of the Equal Opportunity Office (EOO)**

**Responsibilities and Challenges:**

Since 1 October 2008, NDAH cases have comprised fifty percent of EOO workload. Around one third of those cases have reportedly centered on charges of sexual harassment. In addition to bearing primary responsibility for enforcing the NDAH, coordinating and developing sexual harassment trainings, and supporting and coordinating the OP, the EOO works to ensure that UGA is in compliance with a wide range of federal, state, and UGA regulations and policies. These include the Georgia Fair Employment Act of 1978, Title VI and Title VII of the Civil Rights Act of 1964, the Civil Rights Act of 1991, the Age Discrimination in Employment Act of 1967, the Equal Pay Act of 1963, the Rehabilitation Act of 1973, the Vietnam-Era Veterans Readjustment Assistance Act of 1974, the Americans with Disabilities Act, the Pregnancy Discrimination Act of 1978, Title IX of Education Amendments of 1972, Title II of the Genetic Nondiscrimination Act of 2008, and the Ledbetter Fair Pay Act of 2009. Besides developing and maintaining the University’s Affirmative Action Plan and monitoring compliance with that plan, the EOO also bears responsibility for responding to complaints from the U.S. Department of Education, the Office of Civil Rights, the U.S. Equal Employment Opportunity Commission, and the Georgia Commission on Equal Opportunity.

Like the Office of Legal Affairs before it, the EOO faces a number of structural challenges in addressing sexual harassment on campus. In addition to working to reconcile the differing requirements of university policy and of the law, and negotiating among highly disparate administrative units and professional cultures within the university,EOO officersmust attempt to balance the demands of confidentiality with those of responsible record-keeping. Moreover, like all university employees, they must cope with limitations of time, energy, and funding, a requirement that is especially challenging, given the unpredictability of demands for investigation, which may shift from negligible to overwhelming in a few minutes’ time.

Beyond all this, the EOO faces other, more clearly remediable challenges. The first has to do with space. EOO is currently housed in the back basement of Peabody Hall: that is, in a relatively obscure location at the back of a classroom building. This location is not only cramped, but badly configured, either for ensuring privacy during interviews or for maintaining good security. Symbolically, it seems likely to send clear, unfortunate, and misleading signals as to the value that UGA sets on the EOO’s work. Moreover, although EOO staff members do an impressive job of negotiating the spaces in question, doing so clearly takes time and energy that might be better spent on other things. Even in a time of tight budgets, the majority of committee members would encourage the university to give careful consideration to relocating the EOO.

On a different level, as EOO officers have stressed, their office’s effectiveness in enforcing what they see as the spirit of the policy is hampered by flaws and gaps within the wording of the policy itself. Without opining as to the relationship between the policy flaws asserted by the EOO and the problems addressed by this committee, we welcome the President’s plans to establish a policy review and revision process.

**EOO: General Comments**

We approached our reading of EOO files, expecting to gain an intensified sense of the intense challenges and pressures that EOO officers face. This was the case; and our conversations with those representatives demonstrated the energy with which they have sought to meet such challenges. (We note, for example, that when funds for one investigation ran out, the investigator reports having paid money, out-of-pocket, to complete the task.) As previous comments have, we hope, made clear, the committee has been grateful for EOO officers’ thoughtful assistance in thinking through difficult issues concerning the OP, the policy itself, and the policy’s workings within complex university structures. We applaud, too, the EOO’s concern with broader education of the university community, a concern that extends from support for in-service trainings to the establishment of record-keeping designed to identify “hot spots” on campus.

As noted above, one central structural challenge for the EOO is that of balancing the demands of full investigation and record-keeping with those of confidentiality. Our own access to files has been shaped, in certain key respects, by the requirements of this process. As we understand it, we have received full, though redacted, records of all cases closed between the transfer of sexual harassment enforcement to EOO and this past fall. Our comments are based on those files. Because we were not privy to other aspects of the cases recorded here, our capacity to assess decision-making, and with it, the effectiveness of the office’s handling of any specific case, is necessarily limited. Our job, as we understand it, then, is not to second-guess specific past rulings. Rather, it is to bring an outside perspective to bear on questions of policy enforcement. That having been said, we believe that concern for such an outside perspective is central to ensuring enforcement itself. For if a policy against sexual harassment is to be effectively pursued, enforcement not only has to be active, consistent, thoughtful, and objective; it must also be demonstrated to be so.

**EOO: Specific Concerns**

Regrettably, our reading of EOO files has raised serious concerns. The EOO has yet to develop consistent, careful documentation of thorough, even-handed investigation; explicit information as to deliberations processes and grounds for ruling; and, where violations are determined to have taken place, evidence of equitable determination and application of sanctions commensurate with the behavior involved. We realize that the comments and suggestions below will add difficult work to an already strained office. At the same time, we believe that they must be made; and we hope that if they are attended to and properly supported, in the long run, the work of the office will become far more efficient as well as more effective.

**Concern: Insufficient Record-keeping**

As has already been underscored, much of the EOO’s work with respect to sexual harassment involves attempts, both to protect community members’ privacy and to minimize potentially damaging effects of the “rumor mill.” That work is particularly difficult at present, since current restraints on the OP ensure that there is, in effect, nowhere else to go for fully confidential discussion of concerns around sexual harassment.

We stress these points again, because we have grave concerns about the EOO’s recordkeeping.

At best, such recordkeeping seems to be ad hoc. The case files we saw had no standard intake form. Case notes were not consistently filed; indeed, even the precise nature of charges was not always clear. Many of the earliest case files provided did provide informal notes concerning both investigations and grounds for disposition. More recently, however, even such limited information was sometimes absent. More than one recent completed case file offered neither investigative notes nor any indication of the grounds upon which final disposition rested.

As noted, such reticence may spring, at least in part, from a desire to protect confidentiality. Given recent histories of controversy around sexual harassment charges on campus, EOO records must presumably be composed with the possibility of Freedom of Information Act revelations in mind. Still, in the absence of any documentation, either of thorough investigation or of careful deliberation, the university opens itself up to charges of secretive, arbitrary, or even calculatedly unjust behavior—and, at the same time, renders itself incapable of plausible public defense against such charges.

**Concern: Appearance of Arbitrary Interpretation of Policy**

As recent newspaper stories have made clear,the University community in general would benefit from greater clarity as to the EOO’s understanding of the parameters of the sexual harassment policy as a whole.

Like other members of that community, we are aware that we do not know the full facts of the cases whose records have recently appeared in the press. Still, without wishing to enter into the details of past decisions, we would like to state, in more general terms, that we cannot imagine circumstances under which repeated indulgence in aggressive, sexualized public verbal abuse would fail to violate the University’s sexual harassment policy as we understand it. If, in the eyes of the EOO and concerned university officials, the NDAH policy does not, in fact, apply to such situations, then we strongly advise the University Council to urge EOO officers and university administrators to explain why this is the case. The policy’s wording must be flawed; and if so, it can surely be remedied.

What this issue raises, in part, are ongoing challenges with respect to defining boundaries: challenges that we suspect may be intensified by current EOO practice, which is to allow a single staff lawyer singlehandedly to investigate a case, reach a decision, and determine sanctions. We understand that drawing the line between sexual harassment and other forms of discriminatory behavior is not always easy; indeed, at points it may prove impossible. Still, we would like to voice concern over what appear, from the outside, to be patterns of unnecessarily broad application: that is, the invocation of the NDAH in dealing with what appear to be primarily cases of pedagogical incompetence; racial slurs; insufficient maintenance of non-sexual boundaries between supervisors and staff, faculty and students; and even, in one case, conflicts around a personal relationship, where, as far as we could see, both parties had made a good-faith effort to follow NDAH policy.Public awareness that EOO staff officers explicitly review all cases together seems likely to help assuage fears that the policy may be misapplied.

**Concern: Appearance of limited and/or arbitrary sanctions**

As the committee understands, both legal and institutional considerations shape and, to some degree, constrain the EOO’s capacity to determine and enforce sanctions when respondents are found in violation of the sexual harassment policy. Still, committee members were repeatedly startled by how little direct correlation we could perceive between the severity of the behavior documented and that of the sanctions imposed. If we are to judge from sanctions noted in the files we saw, the university currently ranks, say, a concerted campaign of sexual predation, involving repeated pressuring of isolated undergraduates and leading to one student’s reckless physical endangerment, with a single, unacceptably rude classroom joke.

As far as possible, sanctions must be made—and demonstrated to be--commensurate with behaviors. At stake here, again, is not merely the disposition of individual cases: it is the University’s reputation for fairness—and with it, the likelihood that community members will take the risk of stepping forward, especially in situations that seem to involve some risk.

**Concern: Redaction and Confidentiality**

At the time our committee reviewed the files, the EOO was both temporarily understaffed and under particular time pressure. Still, given our chair’s previous conversations with Meg Amstutz, Bob Boehmer, and Steven Shi around questions of confidentiality, she was surprised, on arriving to read her first files, to find these fully unredacted. Clearly, this was a mistake: the files were immediately returned for redaction. What renders this mistake troubling, though, was that in case after case, the allegedly redacted files committee members later received, still contained clear identifying information: departments, positions, and even, in some instances, names. If colleagues’ reports are correct, these are not the first instances of such inadvertent disclosure of private information. We are not sure where the problem lies; but we would encourage the University to support the EOO’s efforts to correct this problem, including, if appropriate, an increase in EOO staff.

**Recommendations**

*Note: In the section below,“require and assist” signals our awareness that in asking the EOO to fulfill the tasks laid out here, UGA should be prepared to devote additional resources to the work of that office.*

*Recommendation 1:* *Establish an NDAH Policy review process.*

*Ensure, insofar as possible, that the deliberations of that process be publicly perceived as transparent and effective, by charging an ad hoc committee to carry out this review. Committee membership should be designed to ensure balanced input from EOO officers, Ombudspersons, and staff, faculty, and students.*

*Instruct committee members to frame new language guaranteeing both complainants and alleged harassers opportunity to review, and if necessary, dispute official EOO investigation reports before a decision is reached. Further instruct committee members to establish a clear, equitable formal appeals process for complainants and alleged harassers who are unsatisfied with university rulings*

*Recommendation 2: Require and assist the EOO to systematize and formalize investigations.*

*Note: Some commitment of resources would presumably be necessary, if only to provide for hiring investigative support on an as-need basis.*

*Recommendation 3: Require and assist the EOO to institute record-keeping systems capable of providing evidence of orderly, consistent, equitable application of rules.*

 *Central to this system: a standard intake form, including referral information, if any, as well as precise charges; relatively detailed investigative notes; a brief summation of findings; and a brief justification for decision reached, in consultation between staff lawyers. If charges are substantiated, files should also include a brief record and explanation of sanctions imposed, as well as, where appropriate, records of ongoing monitoring against retaliation and/or repeat violation.*

*Note: Full success in this process would require that the EOO be able to send potential complainants and others who want to clarify policy questions and/or explore options before filing formal charges to some other less formal access-point (possibly the OP).*

*Recommendation 5: Require and assist the EOO to ensure more effective redaction of sensitive documents.*

*Recommendation 6: Relocate the EOO to a more appropriate space.*

**Closing General Recommendation:**

*The committee strongly recommends that University Council constitute an Ad Hoc Committee, on a regular basis, perhaps every two years, to review University progress with respect to education around sexual harassment and enforcement of sexual harassment policy.*

*Although oversight of OP and EOO functions would be part of this committee’s work, its primary role would be advocacy. Committee members’ central concern would be to encourage the university to continue developing the policies and resources necessary for creating and sustaining a concerted, proactive, multi-layered campaign against sexual harassment.*

1. Steps the NDAH Update suggested include mandatory training of all senior administration, engagement of the appropriate vice president in investigations, and coordination between administration and Council to revise the NDAH Policy. [↑](#footnote-ref-1)