**NMT’S NEW REQUIREMENT FOR A PLAN FOR**

**A SAFE AND INCLUSIVE ENVIRONMENT WHILE CONDUCTING**

**OFF-CAMPUS OR OFF-SITE RESEARCH ACTIVITIES**

**FEQUENTLY ASKED QUESTIONS**

**QUESTION:** What does “off-campus” or “off-site” mean. What if this is only a day trip?

**ANSWER:** The intent of this requirement is to provide guidance and protection for participants when they do not have ready access to the on-campus in-person resources they normally do. If your participants continue to have such access, no plan is needed. If participants are sufficiently distant from campus such that access to these resources is more limited than they would be if they were on campus, then a plan is needed. Work from home by an individual employee would not, for the purpose of this policy, be considered “off-campus” or “off-site.” “Day trips” or excursions (e.g., to public places, schools, the state fair, a mall) where participants are returning without an overnight stay would not normally require a plan. But, a plan should be created if the nature of the off-campus research activity is likely to create a larger-than-normal opportunity for harassment to occur (e.g., studies looking at sexual activities, incarcerated individuals, prior knowledge of harassment in the same setting, etc.) Attendance or presentation of research results at a conference does not require a plan. But, if participants will also engage in the conduct of research activities while attending a conference, a plan is required. When in doubt, create a plan.

**QUESTION:** What does “research activities” mean? I don’t do research; my work is considered an “other sponsored activity”

**ANSWER:** This requirement applies only to research activities. Off-campus or off-site research for the purpose of these requirements is defined as “data/information/samples being collected off-campus or off-site, such as fieldwork or research activities on vessels and aircraft.” PIs are responsible for determining whether the requirement applies to their project or to certain activities on their project. If there happens to be a research component on an award that is characterized as an “other sponsored activity,” then the requirement would apply only to that research component.

**QUESTION**: I forgot to send a plan to one or more participants before we left; what do I do now?

**ANSWER:** If the off-site research is still taking place, send the plan now to the participant(s). If the off-site research is over, send an email to Judy McShannon explaining the circumstances (judith.mcshannon@nmt.edu).

**QUESTION:** Who counts as a “Participant”? Does this include sub-recipient personnel? Other faculty working at the off-campus location with the PI?

**ANSWER:** It includes all NMT participants: employees, students, volunteers, and others working under NMT’s direction (which might include contractors). Sub-recipient personnel should be included in your plan. Check with your sub-recipients and collaborative organizations for the training/contacts/etc. available from their organization. When leading collaborative proposals or proposals with sub-recipients, please share your plan with partner organizations and get agreement on a proposal-wide plan before submitting the plan.

**QUESTION:** I don’t know the names of all the participants or the exact dates of the travel, can I just leave these blank?

**ANSWER:** Complete what you can or state TBD. Once you are awarded and have more details, you will need to update and resubmit the form before you leave campus.

**QUESTION:** Is it possible to name a backup point of contact listed on the form?

**ANSWER:** Yes, in fact it is advisable to have a primary and a secondary point of contact available. The Principal Investigator must be listed on the form in the “PI” box and may also be listed as the point of contact for reporting incidences. You may delegate the point of contact responsibility to another individual who is present at the off-campus location. Make sure and include the cell phone and email of all contacts.

**QUESTION:** What happens if the person doing the alleged misconduct is the named point of contact?

**ANSWER:** It is important to list contact information for at least two individuals (e.g., the PI and a second delegated person) so that there is an on-site second-point-of-contact readily available. Assuming there is internet or cell phone service, the participant can also use one of the other reporting mechanisms to contact their supervisor or a University official responsible for handling misconduct concerns. If the participant is unable or unwilling to notify the primary point of contact and the standard reporting options are not available, the participant may defer reporting until access is available (if they feel it is safe to do so), or approach another senior person on the off-campus team (whether or not from NMT) to assist them in appropriate next steps.

**QUESTION:** I am the PI and I do have special off-site circumstances. What are my options?

**ANSWER:** PIs may devise options they believe are appropriate to the circumstances. Some reasonable options to certain known circumstances might include the following:

1. Cultural norms differ in the location where the off-campus research will take place.

PIs may wish to offer a “pre-departure” briefing for participants explaining cultural norms in the off-site location (physical or touching norms, verbal styles, etc.) PIs can offer alternatives to mitigate concerns arising from cultural differences (e.g., offering to connect only in a group setting, or pairing participants so that there is less opportunity for misunderstanding).

2. In advance of departure, PIs may wish to remind participants that they are personally available to listen to any concerns that participants may have about the off-campus research activity.

3. If the off-campus research site offers terrain, temperature, visual, auditory, or other challenges, offer to meet ahead of time with participants to discuss any special concerns they may have or accommodations they may need in order to fully participate.

4. The PI may wish to engage in regular “check-ins” with off-campus participants to ascertain whether there is anything that is impacting their full enjoyment about the off-campus research experience (physical or cultural barriers, behavior challenges, etc.)

5. Particularly in remote locations, physical circumstances may limit the ability for a participant to be separated from an individual alleged to have participated in misbehavior. The participant and the individual allegedly engaging in misbehavior should be separated as completely as possible. With the participant’s concurrence, consider assigning a “buddy” to help that participant feel safe as well as reduce the likelihood of a possible recurrence - particularly when complete physical separation is not feasible.

6. There is only a single satellite phone (or equivalent) available for contact outside the group. Consider having a second phone available and controlled by a different individual or ask someone from another group or from the entity being visited if participants can also approach them, should need arise for a confidential call to be placed. Consider budgeting for a second phone if that is what is needed to ensure alternate access can be available. Notify participants of their options accordingly.

**QUESTION**: What do you mean – steps to nurture an inclusive off-campus or off-site working environment?

**ANSWER:** What can you do to inform your participants about this issue? Can you have a team meeting before leaving, hand out this information and discuss what participants should do if something happens? Can you create a mentor/mentee pair so everyone has someone they can talk to? Should you schedule regular check-ins with your team? All NMT faculty, staff and students should have taken the “Sexual Misconduct and Title IX Awareness Training” with the Title IX office. You can confirm all NMT participants have taken the training with Peter Phaiah. You need to include sub-awardees and collaborative partners – can they also confirm all participants have been trained? NMT resources include:

* NMT Title IX office - You will find related policies and procedures here <https://www.nmt.edu/titleix/>
* NMT on-line training <https://www.brainshark.com/1/player/trainedsolutions?fb=0&r3f1=&custom=nmtemployee>
* Peter Phaiah, Title IX Coordinator, 575-835-5187, peter.phaiah@nmt.edu

**QUESTION:** What do you mean - Communication processes within the off-site team and to the organization(s) that minimize singular points within the communication pathway?

**ANSWER:** The PI should be listed as well as an alternative on-site person. There should not be a single person overseeing access to a single satellite phone. Participants can communicate to the PI (or someone else) on-site AND NMT faculty, staff, and students can communicate to NMT using the on-line reporting tool, or to the Title IX office or HR. Include sub-awardees and collaborative partners. You may need to wait until returning to campus to report an incident to NMT if there is not phone or internet access available at the research site, or if the person reporting does not feel safe at the research site.

**QUESTION:** Who do you recommend we contact to report suspected misbehavior?

**ANSWER:** The PI should be listed as well as a secondary contact who will be on-site. You may also include NMT contacts below. Include contacts for sub-awardees and collaborative partners.

NMT Contacts:

* Randy Saavedra, Title IX Deputy - randy.saavedra@nmt.edu - 575-835-5005
* Peter Phaiah, Title IX Coordinator - titleixcoordinator@nmt.edu - 575-835-5187
* Joann Salome (faculty & staff), Director of Human Resources - joann.salome@nmt.edu - 575-835-5955
* Jennifer Chapman (students), Dean of Students – deanofstudents@nmt.edu 575-835-5548

**QUESTION:** What mechanism do your recommend we use for reporting issues of harassment if they arise?

**ANSWER:** Participants may use the on-line reporting form or call the NMT contacts. Sub-awardees and collaborative partners should report to their own organization.

* NMT on-line reporting procedures - <https://www.nmt.edu/titleix/Sexual%20Misconduct%20Reporting%20Options%20and%20Procedures.pdf>
* NMT on-line reporting form - <https://cm.maxient.com/reportingform.php?NewMexicoTech&layout_id=1>
* Randy Saavedra, Title IX Deputy - randy.saavedra@nmt.edu - 575-835-5005
* Peter Phaiah, Title IX Coordinator - titleixcoordinator@nmt.edu - 575-835-5187
* Joann Salome (faculty & staff), Director of Human Resources - joann.salome@nmt.edu - 575-835-5955
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**QUESTION:** What mechanisms are available to respond to and resolve issues?

**ANSWER:** You need a plan to remove the person from the situation. Particularly in remote locations, physical circumstances may limit the ability for a participant to be separated from an individual alleged to have participated in misbehavior. The participant and the individual allegedly engaging in misbehavior should be separated as completely as possible. With the participant’s concurrence, consider assigning a “buddy” to help that participant feel safe as well as reduce the likelihood of a possible recurrence - particularly when complete physical separation is not feasible. You must do what you can to make the person feel safe until you can return to campus.

**QUESTION:** What do I do with the form when I have it complete?

**ANSWER:** Email it to Judy McShannon at the research office - Judith.mcshannon@nmt.edu **You MUST distribute it to all participants before you travel.**

**QUESTION:** Where can I get more information?

**ANSWER:** Please check the Title IX website for NMT policies and procedures

<https://www.nmt.edu/titleix/>

or contact Judy McShannon – 575-835-6940 – Judith.mcshannon@nmt.edu