

Operating Standard

Number: 4500.00

Title: Non-Discrimination & Harassment

Type: Administrative

Responsible:

Related Policies: A4500 Linked Procedures: Related Laws: Related Standards: HLC Criterion:

Statement

Procedure No. 4515

TITLE IX Sexual Harassment & Discrimination Procedures

The College has adopted the following procedures to promptly and fairly address concerns and complaints regarding harassment and/or discrimination. Employees shall be trained annually on harassment prevention and corresponding procedures. Any complaint of conduct that constitutes a violation of the Title IX policy shall be subject to the procedures set forth below.

I. Reporting Suspected Violations of Policy

Anyone who wishes to report an alleged violation of the Title IX policy shall do so by way of the following: Submit an online complaint form found by clicking on Title IX section of the Shawnee Community College website https://www.shawneecc.edu/about/title-ix. Or obtain a copy of the complaint form from the office of the vice president of Student Success & Services or the Human Resources Office to complete and submit for investigation. Anonymous reporting is available through the online reporting form, although, it should be noted that anonymous reporting may prohibit the College from conducting a thorough & resolute investigation.

All employees have a responsibility to maintain a work and educational environment free from harassment and discrimination. Any employee who becomes aware of harassment or discrimination is obligated to report the matter to an appropriate Title IX Coordinator to assist in the College's efforts to take prompt and effective remedial action, as directed by the Coordinator. Supervisors who become aware of any possible harassment or discrimination are required to report any incidents immediately to the Coordinator identified in this procedure.

II. Timeframe for Reporting

The College encourages individuals to file complaints as soon as possible following violations of the Title IX policy. While the College does not limit the timeframe for reporting an incident, the college's ability to complete its processes may be limited with respect to student and employees

who may no longer be employed by the College. The inability of the College to fully and adequately investigate a matter may be hindered by delayed reporting and may result in a dismissal of a formal complaint.

III. Resolution Coordinators

The College has designated two Resolution Coordinators, vice president of Student Success & Services and director of Human Resources. The Resolution Coordinators shall conduct the initial intake of information related to potential violations of this policy and shall facilitate the processing of all reports and/or complaints under these procedures. Individuals who report conduct wherein a person may have experienced any form of identity-based harassment, discrimination, or violence, shall be referred to the College's Title VI and Title IX Coordinator.

IV. Intake Interview

The Title IX Coordinator will discuss the Complainant's rights and options, and will also assess for and provide appropriate Supportive Measures, which are available with or without the filing of a Formal Complaint. If a Formal Complaint has not already been filed, the Title IX Coordinator will explain to the Complainant the process for filing a Formal Complaint.

Upon receipt of information alleging a potential violation of this policy, the Title IX Coordinator shall contact the Complainant to schedule an intake or informational interview and provide a copy of this policy and the following:

- Availability of supportive measures with or without filing a Formal Complaint;
- How to file a Formal Complaint;
- Right to notify law enforcement and the right not to notify law enforcement;
- Importance of preserving evidence;
- Resources for counseling, health care, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other available services;
- Right to an Advisor of choice.

A Complainant may choose to receive Supportive Measures only and not proceed with the filing of a Formal Complaint or any other resolution process. A Complainant may also request an informal resolution or an investigation and Hearing. If a Complainant chooses to pursue an investigation and Hearing, a Formal Complaint is required. For those Complainants who wish to proceed with a resolution process, the Title IX Coordinator will also assess the facts as presented to determine whether the information provided suggests a potential violation of this policy. In the event the allegation involves a sexual assault, dating or domestic violence, or stalking within Clery geography, the Title IX Coordinator will also notify the Clery Coordinator of the

allegations. Complainants will also be provided with information about their right to file with law enforcement, their right to decline to do so, and, when applicable, information about seeking a personal protection order from the local courts. If the complaint does not meet the required definitions of this policy, the Title IX Coordinator will not initiate any Resolution Method. The Title IX Coordinator shall have the discretion to sign a Formal Complaint and initiate an investigation when a Complainant's allegations involve violence, use of weapons, serial predation, or similar factors. When the Title IX Coordinator signs a Formal Complaint, the Title IX Coordinator does not become the "Complainant" for purposes of this policy.

V. Emergency Removals

Upon receipt of all allegations which may constitute a violation of this policy, the Resolution Coordinator will determine whether there is an immediate threat to the health or safety of any member(s) of the campus community. If at any time SCC determines that the conduct, as alleged, poses a risk of physical harm to one or more members of the SCC community or to SCC's educational environment, SCC may instruct that a student Respondent be suspended, on an interim basis, from specific programs or activities. Any such assessment will be made on a case-by-case basis, based on an individualized safety and risk analysis. If SCC determines that an immediate physical threat to the health or safety of students or others justifies removal from campus, then the Respondent may be suspended until a full investigation has concluded. The decision to do so will be provided to Respondent in writing.

Further, SCC shall have the authority to place any employee who has allegedly violated this policy on an administrative leave-of-absence pending the outcome of an investigation and hearing. Such measures are designed to restore and preserve access to the recipient's education program or activity, without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the recipients' educational environment, or deter sexual harassment. If the alleged conduct does not indicate a potential violation of policy, or identifies conduct that is not related to any education program or activity of the College that is within the administrative control of the College, then the resolution coordinator may forward the information to appropriate Student Services or Human Resources officials for consideration under the Student Code of Conduct or other College policies and procedures.

VI. Complaint Filing

Upon determination that the alleged violation meets applicable legal standards, the potential complainant may elect to file a formal complaint which shall initiate the applicable grievance procedure set forth herein. Upon filing of the complaint, the respondent shall be entitled to a presumption of innocence and supportive measures pending resolution of the complaint. The resolution coordinator shall promptly provide written notice to the parties that shall include a summary of the grievance procedure and any informal resolution process that the complainant may wish to pursue by way of a voluntary written agreement between the complainant and the

respondent. Such notice shall detail the allegations that could constitute a violation of policy and warrant application of the formal complaint process herein. The parties shall be further notified that proof of any policy violation shall be subject to a clear and convincing evidence standard (i.e., highly and substantially more likely true than not true standard) and that all evidence obtained in the course of investigating the complaint shall be shared with the parties.

Timeframes shall be established for conducting the investigation and concluding the process, and the parties shall be notified of the range of possible sanctions or remedies that the College may implement if proof of the alleged violation is established.

VII. Advisors

If the complaint alleges conduct that could constitute a violation of Title IX, then complainants and respondents shall be entitled to assistance by an advisor at: both formal and informal meetings and telephone conferences, interviews, and, if applicable, a subsequent hearing. The College shall maintain a pool of trained advisors who shall be available to the parties on a cost-free basis, or either party in a Title IX complaint may select an advisor of their choosing and at their expense. There shall be no requirement that any party's advisor be chosen from the College's pool or that any advisor shall be from the College community. Advisors may not speak on behalf of a complainant or respondent or testify during the course of a hearing; although, they may request suspension of any meeting, interview or hearing to provide consultation. In addition, advisors shall be allowed to cross-examine the other party and any witnesses during the hearing phase of these proceedings. Accommodation for scheduling of interviews or hearings shall not be made for any advisor if such accommodation shall unduly delay the investigation and/or hearing process.

VIII. Informal Resolution

Informal resolution of any complaint may be implemented at the direction of the Resolution Coordinator when the complainant, having been fully informed of available options, has agreed in writing with the respondent to pursue the voluntary, informal resolution process (provided informal resolution cannot be pursued with respect to complaints alleging sexual harassment, sexual misconduct or sex-based discrimination involving both a student and an employee). Either complainant or respondent may thereafter elect to terminate the informal resolution process, and in such event, the parties shall revert to the formal resolution process as applicable to the allegations in the complaint. Any information obtained during the informal process may be used in the subsequent formal resolution process. At the discretion of the Resolution Coordinator and with written consent of both parties, informal resolution may include mediation before an objective and appropriately trained third-party designated by the Resolution Coordinator. Either party involved in an informal resolution may withdraw their consent at any time. If either party withdraws consent to participate in the informal resolution process, the complaint will be directed to the formal resolution process.

IX. Formal Resolution Process

The formal resolution process shall occur when a complainant seeks a formal resolution, or the Resolution Coordinator determines that a formal resolution process is necessary for maintaining the safety of the broader campus community. In circumstances where the Resolution Coordinator has determined that there is a serious threat to such community or a pattern of behavior is present, the Resolution Coordinator may assume the role of complainant even if the complainant cannot or does not wish to proceed with the formal process. The formal process shall include the following:

- A. A written complaint shall be submitted to the Resolution Coordinator and the respondent shall be provided with a copy of said complaint.
- B. The respondent shall have five business days to submit a statement to the Resolution Coordinator in response to the allegations set forth in said complaint.
- C. Two objective and appropriately trained investigators shall be appointed by the Resolution Coordinator. In some cases, Resolution Coordinators may also serve as investigators.
- D. The investigators shall promptly commence collection of relevant records and information and shall commence interviews with the parties and witnesses. Either party may prepare questions to be asked of the other party or any witness during the investigative phase. Upon completion of record review and analysis and all interviews, the investigators shall prepare an initial investigation report that shall be shared with the parties (and their advisors, if applicable) and the Resolution Coordinator.
- E. Within five business days following receipt of the initial investigative report, the complainant and respondent may provide a written response to the investigators.
- F. The investigators shall consider any responses and the investigation report shall then be finalized and shared with the parties (and their advisors, if applicable) and the Resolution Coordinator.

X. Title IX Hearings

If the complaint alleges Title IX violations, the Resolution Coordinator shall appoint a three-member hearing panel, and the hearing panel shall select a Chair who shall preside over the hearing and rule on issues of relevance and any procedural issues that may be raised by the parties or their advisors. The Resolution Coordinator shall provide hearing panelists with the investigative report and any written statements from the parties at least 10 days prior to the hearing. Hearings shall be conducted virtually and shall be recorded. The complainant and respondent shall be required to appear and testify at the same time with the investigators and such witnesses as shall be requested or authorized to appear by the Chair. Each party's advisor shall be allowed to cross-examine the other party and any witnesses. Cross-examination shall be limited to relevant questions as determined by the Chair. Upon conclusion of the hearing, the

panel shall convene to deliberate and render a decision by majority vote. The Chair shall then prepare a written decision which shall include:

- A. Allegations;
- B. Description of the procedural steps undertaken during the investigative process;
- C. The decision regarding whether the respondent has violated College Policy;
- D. Findings of fact that support the panel's decision with respect to each allegation;
- E. Sanctions and/or remedies to be implemented for any findings that the respondent has violated College Policy; and
- F. The procedures and basis for appeal by either party of the hearing panel's decision.

The decision of the hearing panel shall be made within 10 business days of the conclusion of the hearing and shall be simultaneously shared with the parties, their advisors (if applicable), and the resolution coordinator.

XI. Disposition of other than Title IX Cases

If, or to the extent that, a complaint does not involve Title IX violations, then the investigators shall determine whether a violation of policy has occurred and shall submit findings in writing to the complainant, the respondent, the Resolution Coordinator, and appropriate College administrative officials, including, but not limited to: the immediate supervisor (if the Respondent is an employee), the vice president of Student Success & Services (if the respondent is a student), the vice president of Academic Affairs (if the respondent is a faculty member or student), the Director Human Resources (if the Complainant or Respondent is an employee), and the President. The report of investigative finding shall be rendered within 30 business days of the investigators' receipt of the formal written complaint and shall include the procedures and basis for appeal by either party.

XII. Disciplinary Action

For violations under this policy as it relates to Title IX, the appropriate Resolution Coordinator shall implement any sanctions for the Respondent and any remedies for the Complainant as directed by the hearing panel. For all other violations of this policy and in accordance with College Disciplinary Policies and Procedures, the immediate supervisor (if the respondent is an employee) or the vice president of Student Success & Services or designee (if the Respondent is a student) shall consult with appropriate College administrative officials regarding formal disciplinary actions to be taken against the Respondent.

In making a decision regarding discipline, the appropriate College administrative officials shall consider records of previous misconduct and the seriousness of the violation. A complaint made more than 12 months after an alleged incident may not be the basis for taking formal disciplinary

action. However, where there are allegations made within the 12-month period that a pattern or practice exists or prior complaints have been confirmed, the appropriate College administrative official shall consider the totality of information in determining appropriate discipline. The appropriate College administrative officials may review any part of the investigative records. Appropriate discipline for employees may range from verbal warning or written reprimand to termination/dismissal for cause. Appropriate discipline for students may range from written warning to suspension and/or expulsion. The Respondent and the Resolution Coordinator shall be notified in writing of the disciplinary decision. The Resolution Coordinator shall, in turn, notify the complainant regarding the resolution of the Complaint and the corrective actions to be taken and/or discipline to be imposed.

XIII. Appeals

Both the Complainant and Respondent shall have the right to appeal a final determination of responsibility and/or the resulting disciplinary sanction or other remedy on the grounds of a material procedural error that affected the outcome of the complaint and/or new evidence not reasonably available during the investigative process (or hearing, if applicable). Written request for appeal must be submitted to the Resolution Coordinator within five (5) business days following delivery of the hearing panel's decision (in Title IX cases) or following notice of the investigators' findings and any subsequent discipline or remedy (in other than Title IX cases) and shall include the grounds for appeal. Upon determination by the Resolution Coordinator that there are legitimate grounds for appeal, the matter shall be advanced by the Resolution Coordinator to an objective and appropriately trained hearing officer who shall not be an employee of the College. Each party shall be given an opportunity to respond in writing, within five (5) business days, to any appeal submitted to the Resolution Coordinator by the other party, and such response will be included with the appeal and shall be provided to the hearing officer. If appeal is granted and it is determined that a material procedural error occurred with respect to a Title IX complaint, the complaint will be re-heard by a new hearing panel. If it is determined that there is new and relevant evidence that was not available at the time of the initial hearing, the matter will be returned to the same hearing panel members who shall render a decision in light of the new evidence.

If appeal is granted and it is determined that a material procedural error occurred or there is new and relevant evidence that was not available during the investigation of any complaint that did not involve Title IX allegations, the matter shall be returned to the investigators who shall prepare an updated investigation report for submission to the Resolution Coordinator, and, if applicable, to the appropriate College administrator for imposition of disciplinary sanction or initiation of other remedial options.

XIV. Confidentiality

Reasonable efforts shall be made to protect the identity of those involved in complaints to the extent possible. At the discretion of the Resolution Coordinator, disclosure of information regarded in or pertaining to a complaint and investigation shall be limited to those people who have a legitimate reason to know in the discretion of the Resolution Coordinator.

XV. Retaliation

The College prohibits retaliation against any individual because they have participated in, or declined to participate in, the College's complaint resolution procedures, or because they have opposed conduct that they reasonably and in good faith believe to be harassing or discriminatory. Any retaliatory behavior should be reported to the appropriate Resolution Coordinator. A person adjudged to have engaged in retaliatory conduct shall be subject to disciplinary action as otherwise provided by Administrative Policy.

XVI. Amnesty Provision

A student who in good faith participates in the complaint/investigative process hereunder shall not be removed from an education program or activity or receive a disciplinary sanction for misconduct that is revealed in the course of such complaint/investigative process (e.g., underage drinking) except in circumstances where the College reasonably determines that the student's misconduct was sufficiently egregious to risk the health and/or safety of others.

XVII. False Accusation

Any person making a knowingly false accusation shall be subject to disciplinary action.

XVIII. Written Record of Complaints, Investigations and Resolutions/Decisions

Written or electronic records of complaints shall be marked "CONFIDENTIAL" and shall be retained in a separate and secure file in the office of the appropriate Resolution Coordinator. Records shall be retained as required by law. Written records relating to a finding in support of a policy violation shall be placed in the respondent's official personnel file (if Respondent is an employee) or official College file (if Respondent is a student) and shall be retained according to retention policies.

XIX. Conflict of Interest

The Complainant or Respondent may allege a conflict of interest with an investigator, advisor, hearing panel member, or hearing officer (in the event of an appeal) by reporting their concerns to the Resolution Coordinator. If the Resolution Coordinator determines that any party involved in these procedures has a conflict of interest with either party to a complaint or who shall otherwise be unable to render objective service under these procedures, the Resolution Coordinator shall excuse that individual and appoint a successor. If the Resolution Coordinator is deemed to have a conflict of interest, then the Resolution Coordinator shall be replaced with a successor designated by the College President.

XX. Sexual Violence Awareness and Prevention Task Force

As part of Shawnee Community College's commitment to maintaining a safe community free of any sexual misconduct the College has established a campus wide task force to continually review and address sexual violence awareness, prevention, and response initiatives. The

membership of this task force consists of: Director of Human Services, Vice President of Student Success and Services, Director of Information Technology, Student Counselor, Director of Student Success Center, Campus Security, Registrar, Director of Communication and Public Relations, Extension Center Director Representative, Faculty Representative, Student Representative (2), and Athletic Director.

Appendix Definitions for the College's Sex-Based Misconduct Procedures

Bystander Intervention: See Section 5 of the Preventing Sexual Violence in Higher Education Act, 110 ILCS 155/5.

Clear and Convincing: The **evidence** is highly and substantially more likely to be true than untrue; the fact finder must be convinced that the contention is highly probable.

Complainant: An individual who is alleged to be the victim of conduct that could constitute sexbased misconduct.

Confidential Advisor: A person who is employed or contracted by the College to provide emergency and ongoing support to student survivors of sexual violence. Confidential Advisors may include persons employed by a community-based sexual assault crisis center with whom the College partners. Individuals designated as "Responsible Employees" in Section VI of these Procedures are not Confidential Advisors.

Consent: Consent means informed, freely and actively given, mutually understandable words or actions that indicate a willingness to participate in a mutually agreed upon sexual activity. A person can withdraw consent at any time. There is no consent when there is coercion, force, threats, or intimidation. There is no consent when the victim is under duress or is deceived. A person's lack of verbal or physical resistance or manner of dress do not constitute consent. Consent to past sexual activity with another person does not constitute consent to future sexual activity with that person. Consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person. A person cannot consent to sexual activity if the person is unable to understand the nature, fact, or extent of the activity or give knowing consent due to circumstances including without limitation the following: the person is incapacitated due to the use or influence of alcohol or other drugs; the person is asleep or unconscious; the person is under the legal age to provide consent; or the person has a disability that prevents such person from having the ability or capacity to give consent.

Dating Violence: Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim, where the existence of such a relationship is determined based on the reporting party's statement and with consideration of the length of relationship, the type of the relationship, and the frequency of the interaction between the persons involved in the relationship. For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence: Includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the State of Illinois, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the State of Illinois.

Education Program or Activity: A location, event, or circumstance over which the College exercised substantial control over both the respondent and the context in which the sex-based misconduct occurs, and also includes any building owned or controlled by a student organization that is officially recognized by the College.

Hate Crime: an act or an attempted act that violates a criminal statute by any person that in any way constitutes an expression of hostility toward the victim because of their sex, race, ethnicity, religion, age, disability, national origin, sexual orientation, or gender-related identity, color, marital status, military status or unfavorable military discharge.

Hostile Environment: Sexual Harassment: an intimidating or offensive environment is created when conduct is so that it denies or limits an individual's ability to participate in or receive the benefits, services or opportunities of the College's educational programs or activities or the individual's employment access, benefits or opportunities.

Intimidation: To intentionally make another timid or fearful, to compel or deter by or as if by threats. Intimidation is a form of retaliation prohibited by the College's policy Prohibiting Sex-Based Misconduct and these Procedures.

Preponderance of the Evidence: When considering all the evidence in the case, the decision-maker is persuaded that the allegations are more probably true than not true.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute sexual misconduct.

Responsible Employee: A College employee who has the authority to redress sexual misconduct, who has the duty to report incidents of such misconduct or other student misconduct, or whom a student could reasonably believe has this authority or duty. Section VI of these Procedures lists categories of employees who are Responsible Employees for the College.

Retaliation: Any form of retaliation, including intimidation, threats, harassment or other adverse action taken or threatened against any complainant or person reporting or filing a complaint alleging sexual discrimination, harassment or misconduct or any person cooperating in the investigation of such allegations (including testifying, assisting or participating in any manner in an investigation) is strictly prohibited. Action is generally deemed adverse if it would deter a reasonable person in the same circumstances from opposing practices prohibited by the College's Sexual Misconduct Policy and these Procedures. Retaliation may result in disciplinary or other action independent of the sanctions or supportive measures imposed in response to the allegations of sexual discrimination, harassment, or misconduct.

Sexual Assault: Sexual assault means any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. This includes: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. The touching of the private body parts of another person for the purpose of sexual gratification, without the consent, as defined in this policy, of the victim. Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Sexual Misconduct: Misconduct on the basis of sex, sexual orientation, gender, gender identity, gender expression. Such misconduct includes sex discrimination, sexual harassment, sexual assault, sexual exploitation, dating violence, domestic violence, sexual violence and stalking.

Sexual Exploitation: When a person takes non-consensual or abusive sexual advantage of another for anyone's advantage or benefit other than the person being exploited, and that behavior does not meet the definition of sexual assault. Sexual exploitation includes prostituting another person, non-consensual visual or audio recording of sexually explicit material, non-consensual distribution of photos or other images of an individual's sexually explicit material with an intent to embarrass such individual, non-consensual voyeurism, knowingly transmitting HIV or a sexually transmitted disease to another, or exposing one's genitals to another in non-consensual circumstances.

Sexual Harassment: Unwelcome sexual advances, requests for sexual acts or favors, and other verbal, non-verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment, academic advancement, evaluation, or grades;
- Submission to or rejection of such conduct by an individual is used as a basis for employment, academic advancement, evaluation, or grading decisions affecting that individual;
- Such conduct has the purpose or effect of substantially interfering with an individual's employment or educational performance or creating an intimidating, hostile, or offensive employment or educational environment; or
- Such conduct denies or limits an individual's ability to participate in or receive the benefits, services or opportunities of the College's educational programs or activities or the individual's employment access, benefits or opportunities.

Examples of conduct of a sexual nature may include:

- Verbal: Specific demands for sexual favors, sexual innuendoes, sexually suggestive comments, jokes of a sexual nature, sexual propositions, or sexual threats, whether spoken or in emails, articles, documents, or other writings.
- Non-Verbal: Sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds or gestures, leering, whistling, or obscene gestures.
- Physical: Touching, pinching, brushing of the body, or any unwelcome or coerced sexual activity, including sexual assault.

Sexual Violence: Any sexual acts attempted or perpetuated against a person's will or where a person is incapable of giving consent (e.g., due to the person's age, use of drugs or alcohol, or because an intellectual or other disability prevents the person from having the capacity to give consent). Sexual violence includes, but is not limited to, rape, sexual assault, sexual battery, sexual abuse and sexual coercion. All such acts of sexual violence are forms of sex discrimination prohibited by Title IX.

Survivor: An individual who has experienced sexual violence, domestic violence, dating violence, or stalking while enrolled, employed, or attending an event at a higher education institution; See Section 5 of the Preventing Sexual Violence in Higher Education Act, 110 ILCS 155/5.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: 1) fear for his or her safety or the safety or others; or 2) suffer substantial emotional distress.

Threat: Any oral or written expression or gesture that could be interpreted by a reasonable person as conveying an intent to cause harm to persons or property.

Trauma-Informed Response: See Section 5 of the Preventing Sexual Violence in Higher Education Act, 110 ILCS 155/5.

Change Log	
Description of Change	Governance Unit
Updated to reflect Administrative Policy	Student Affairs
	Description of Change