

# **Rules Administrator Annual Report, AY2024-2025**

This report provides information about the administration of the Rules of University Conduct (“the Rules”) during Academic Year 2024-2025. The main foci of the Office of Rules Administration (ORA) during this time were the resolution of major sets of cases from Spring 2024 involving charges of Rules violations and the processing of new complaints that were received. A significant amount of resources were also devoted to preparing for protests and demonstrations in order to establish parameters necessary to strike the balance between free expression and achievement of the University’s academic mission that is central to the Rules.<sup>1</sup> The affirmative statement of the Rules avers, “just as all members of the University community have the right to speak, to study, research, to teach, and to express their own views, so must they allow others in the community to do the same. The right to demonstrate, for example, cannot come at the expense of the right of others to counter-demonstrate, to teach, or to engage in academic pursuits requiring uninterrupted attention.”

The Rules seek to protect both demonstration activity and the integrity of the University’s academic mission by delineating time, place, and manner parameters and providing certain respondent protections when members of the community are alleged to have not followed those parameters. The Rules Administrator is tasked with administering the Rules to achieve this balance.

## **The Office of Rules Administration**

Upon her appointment as Interim President of the University, Katrina Armstrong sought to strengthen the administration of the Rules by appointing a new Rules Administrator and providing more resources in support of this role. The appointment of Professor Gregory Wawro to the position of Rules Administrator (RA) was formally announced on September 7, 2024. To build out the Office of Rules Administration, which is housed in University Life, several new positions were created to support the RA and to strengthen and streamline Rules processes. The ORA adopted the Maxient reporting system in order to enhance

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<sup>1</sup> The Rules do not provide a definition of what constitutes a “protest” or “demonstration.” Nor are they defined elsewhere and the terms are often used interchangeably. The ORA does not try to distinguish whether an event is a “protest” or a “demonstration.” This document will use the term “demonstration” to describe events that fall under the jurisdiction of the Rules.

confidentiality and improve case management and record-keeping.<sup>2</sup> The newly constituted ORA adopted fairness, efficiency, and transparency as its guiding principles for conducting its work and assessing its performance, and sought broader engagement with the community to improve understanding of the Rules and learn about perceptions of the three principles and community expectations. Columbia's extensive commitment to free speech is embodied in the Rules, and the existence of the Rules distinguishes Columbia from its peer institutions. Affording broad protections of the right to demonstrate while also protecting the wide array of activities that make up the University's academic mission introduces a significant degree of complexity to the administration of the Rules. The ORA takes seriously the educational component of its charge and seeks to help the community better grasp the complexities in the Rules. To that end, the ORA launched a [website](#) to foster easier access to information about the Rules and enable the RA to provide [updates](#) to the University Community about Rules-related matters.

### **Demonstration activity**

During the Fall 2024 and Spring 2025 semesters, demonstrations occurred on essentially a weekly basis, with some weeks seeing multiple events. Whether or not an event was subject to the Rules was determined by the ORA, based on a totality of circumstances, often including reviewing the notices received and, in the absence of formal notice, announcements on social media or notification by Public Safety at the time of an unanticipated demonstration. For maintenance of strict content neutrality, consideration of social media posts was purely for operational purposes and not evaluative of content. The ORA worked with University leadership, administrators, staff, and faculty to prepare for demonstrations in order to avoid disruptions and Rules violations. The ORA would meet regularly and on an emergency basis with stakeholders to determine how best to provide logistical support for demonstrations. The Guidelines to the Rules of University Conduct ("the Guidelines") stated, "Organizers or sponsors of demonstrations, protests, and other similar events should provide notice no later than at the time of their public announcement (including email or social media) to Public Safety and University Life, by emailing [eventnotifications@columbia.edu](mailto:eventnotifications@columbia.edu) or filling a webform at <https://eventnotifications.columbia.edu>, so that any preparations deemed necessary for ensuring the safety of the community may be made by the relevant campus office(s)."<sup>3</sup>

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<sup>2</sup> The Rules state that the RA "shall maintain and have custody of the records of proceedings under these Rules."

<sup>3</sup> This language was in effect for AY24-25. The Guidelines are no longer operative after the adoption of changes to the Rules on September 13, 2025 that incorporated many parts of the Guidelines into the Rules.

This procedure is important because it enables the University to plan in ways that balance free expression with the achievement of its academic mission and performance of University functions without disruption. On any given day, there are typically a large number of academic and non-academic events planned for spaces on the University's campuses, some of which have been scheduled months in advance. It is imperative that demonstrations not infringe on the rights of others to engage in University functions. It is also important for the University to provide equal opportunities for counter-demonstrations and a safe environment for all community members.

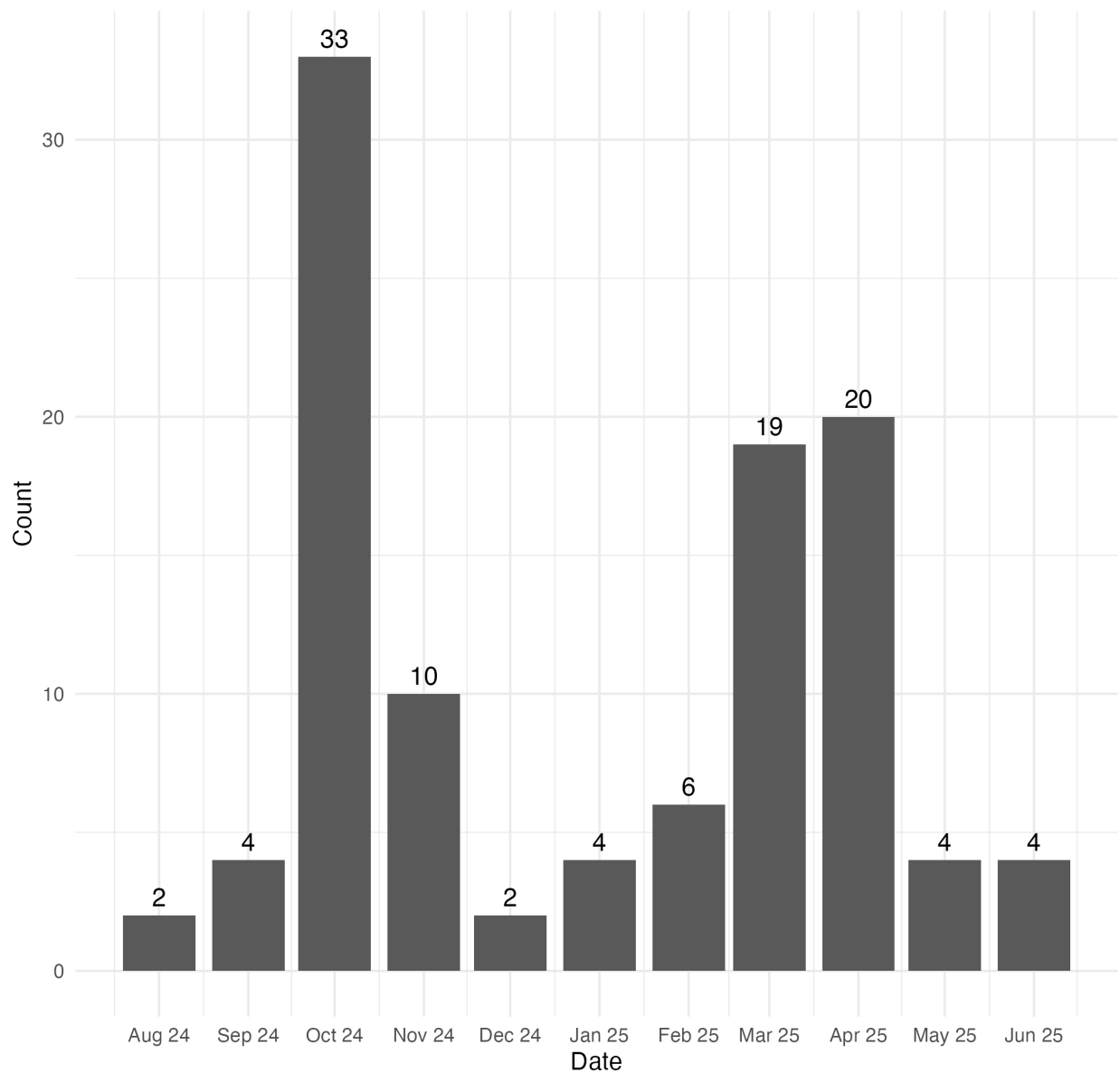
The University was not always notified in advance of demonstrations, complicating preparation tasks in a variety of ways. For University Delegates to perform their critical roles as delineated in the Rules, it is important to know the expected size of a demonstration to determine the number of Delegates who need to be assigned (the role of University Delegates is further described in the "Delegate Usage" section below). If organizers do not provide notice with this information, it is not clear how many Delegates are needed. If another event is scheduled for a given space and time, it can be difficult or impossible to contact organizers who have not provided notice to inform them that their demonstration conflicts with a previously scheduled event or has a high probability of disrupting academic activities. In some instances, other communication efforts (e.g., inquiries by student group advisors) were effective in avoiding these kinds of conflicts. The University continues to consider improvements to the notification process to better balance free expression with minimization of negative externalities. This is complicated by questions about the accountability of (and possible negative consequences for) organizers.

During AY24-25, over 63,000 events took place on Columbia's campuses, 108 of which the ORA categorized as demonstrations.<sup>4</sup> Demonstrations occurred essentially every week during the Fall and Spring semesters, with some weeks seeing several demonstrations. Figure 1 displays data on the number of demonstration events by month during AY24-25. In terms of numbers, October 2024 saw the most demonstrations, with 33 in total, while April and March saw the second and third most demonstrations, with 20 and 19 respectively. Columbia continues to be a place where members of the community engage actively in free expression through demonstrations.

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<sup>4</sup> The total number of events was compiled by CUIT from the various campus CUIT event booking systems that are used to manage access to University spaces.

Figure 1. Count of demonstrations by month, AY24-25



### Delegate Usage

University Delegates are a vital part of sustaining Columbia’s tradition of vigorous debate, open inquiry, and freedom of expression. Delegates are Officers of Administration appointed by the President and/or the RA. In accordance with University Statutes, “Delegates have authority for the enforcement of these Rules. They shall warn individuals and groups whose actions may violate these Rules and may declare their belief that the demonstration does not conform to the Rules of Conduct. They shall, when facts known to

them or brought to their attention warrant, file a complaint with the RA against alleged violators.”

Delegates attend University events as well as demonstrations to support the ability of all members of the University community to express their views — without regard to the content of the expression — while helping to maintain a safe environment and the normal functioning of University operations.

Delegates do not have disciplinary authority. Their role is to document observations, provide timely guidance and warnings when appropriate, and submit reports of potential violations to the RA for further review.

During AY24-25, Delegates were present at 460 discrete events. This figure represents a small fraction — just 0.8% — of the total number of events that took place on Columbia's campuses during this period. The assignment of Delegates to events occurs in a variety of ways. Event organizers can request Delegate presence for help in managing a pre-planned event that is not a demonstration, but where it is possible that a demonstration might occur incident to the event. Large scale events like graduation ceremonies have Delegates automatically assigned to them. If organizers submit a webform for a demonstration or announce a demonstration to the community, Delegates will be assigned based on expectations of size and nature of the demonstration. Lastly, when an unanticipated demonstration occurs, "on-call" Delegates will be assigned in the moment. Events usually require at least two Delegates working in a pair, and depending on the nature and duration, may require multiple Delegates working in shifts. Delegate assignments tracked demonstration events, with the highest number of assignments occurring in months with the most demonstration activity.

It is useful to consider year-on-year changes in Delegate usage. The total number of events in FY24-25 where Delegates were present (including Delegates who were on standby) increased by 91% over FY23-24. The total number of Delegate service hours increased by 456%.

### **Complaints of Rules Violations**

Of the 108 demonstration events that took place in AY24–25, 47 (44%) were reviewed through the Rules process. The Rules state that the RA “shall accept and investigate complaints, file charges, organize informal settlements, and present evidence in support of charges to the hearing panels.” Complaints of Rules violations can be submitted by any member of the University community through the ORA website. Complaints can also be submitted directly by Delegates and by Public Safety. The ORA investigates all complaints

of Rules violations although the degree to which an investigation is conducted depends on the nature of the complaint. For example, some complaints lack specificity, limiting the extent to which they can be investigated.

While demonstration activity occurred frequently during AY24-25, very few demonstrations resulted in complaints where Rules violations were alleged to have occurred. The ORA received 166 reports where potential Rules violations had occurred in connection with events (some events had multiple reports associated with them). Delegates submitted 142 reports, while 24 came from other members of the University community. Of the 460 events covered by Delegates, they reported possible Rules violations for only 37 (8%) of them. Not all of the reports resulted in Rules investigations, but all investigations conducted were linked to at least one Delegate or non-Delegate report.

Of the 47 distinct events that were ultimately associated with Rules investigations, the complaints were dismissed for 27 of them for a variety of reasons. In several cases, there were not clear Rules violations or there was not sufficient evidence to support charges of violations. In some cases where the evidence of Rules violations was insufficient to establish a violation, the RA still met with individuals who were involved to discuss concerns about why certain behaviors implicated the Rules. For 13 events, the ORA did not pursue charges because other disciplinary processes were deemed more appropriate, including regarding jurisdictional scope. For three events, there was credible evidence of Rules violations but informal resolutions were reached with some of the respondents after the RA engaged with them in a thorough discussion about the Rules and the behavior in question. The RA decided that informal resolutions were appropriate because the educational goals of the discussion were achieved. However, for one of these three events and for a separate event, charges were filed with the University Judicial Board (UJB) for respondents who did not respond to attempts to achieve informal resolutions. The position adopted by the RA is that the educational goals of a discussion cannot be achieved if a respondent does not respond to attempts to contact them and it creates the wrong incentives if a case is dismissed simply because the respondent did not respond.

For three other events, charges were filed with the UJB because the seriousness of the charges precluded informal resolutions. For two of these events, the RA exercised the authority granted under the Guidelines to issue interim sanctions because of concerns about further substantial and persistent disruption of academic activities. With the approval of the UJB, those sanctions remained in place (although with some modifications) until the cases were resolved.

Thus, only 5 of the 108 demonstrations identified (4.6%) resulted in charges being filed with the UJB. The UJB is defined in the Rules but is independent of the ORA. The UJB is a panel that determines whether charges of Rules violations are supported and if so, it decides what sanctions, if any, are appropriate. The ORA submits to the UJB evidence in addition to a charging document that outlines the alleged Rules violations. During a hearing, the ORA presents the case to the designated UJB panel and responds to questions from panelists. Individuals charged with Rules violations can also submit documents and other evidence to the UJB in their defense, can call witnesses to testify on their behalf, and have the opportunity to challenge the charges and evidence submitted. They can present their defense in the hearings and the UJB can ask them questions, although they maintain the right to decline to make self-incriminating statements.

For the cases where formal charges were submitted, the UJB found respondents responsible for Rules violations in 99% of them, and the UJB issued sanctions in 99% of those cases where there was a finding of responsibility. The findings included a mixture of “simple” and “serious” violations as defined in §443 of the Rules. Sanctions included conditional disciplinary probation, disciplinary probation, suspension, expulsion, degree revocation, and restrictions on access to campus.<sup>5</sup> Thus, although clear Rules violations where charges had sufficient support to warrant filing them with the UJB were rare, the outcomes resulted in serious and meaningful sanctions.

We analyzed data on the length of time to resolve Rules proceedings.<sup>6</sup> The average length of time between the date of the incident and the date of resolution was approximately 18 business days (with a standard deviation of 22 days). For cases that were dismissed, the average resolution time was approximately 12 business days (with a standard deviation also equal to 12 days). Cases where informal resolutions were reached took approximately 18 business days on average (standard deviation of 11 days). Part of the reason for the additional time required for resolving these cases was that it was necessary to give respondents sufficient time to decide whether or not to accept the informal resolutions proposed by the RA. Other factors contributing to the length of time to reach a resolution included accommodating students’ scheduling requests, the fact that some events require hearings for multiple respondents, and the fact that respondents have the opportunity to appeal decisions (the times to resolution reported here include the appeal process, which is handled by a separate appeals panel and not by the UJB).

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<sup>5</sup> The figures on UJB decisions do not include events from AY23-24, some of which were brought to resolution by the UJB in AY24-25. This data analyzed for this report include only events that occurred in AY24-25.

<sup>6</sup> We exclude from this analysis two cases where the respondents never responded to communications, which prolonged the process well beyond what the ORA or the UJB could control.

For some investigations, the ORA was able to dismiss the complaints promptly—in as little as one business day. This was possible in some cases because it was clear that the behavior in question did not constitute Rules violations or there was little to no evidence of Rules violations.

We also analyzed the number of business days that it took to reach particular points in the process for cases where charges were submitted to the UJB. Submission of charges to the UJB took on average approximately 26 business days from the date of an incident (with a standard deviation of 13 days). UJB panels issued decisions within 60 business days on average from the incident date (with a standard deviation of 40 days). For cases where respondents appealed the UJB panel decisions, the appeals process concluded on average within 75 business days from the date of the incident (with a standard deviation of 28 days). The length of time to reach outcomes was extended significantly by the exceptionally large number of respondents involved. Even though there were only five instances where charges were filed, the cases involved 78 respondents, which historically is a high volume for Rules processes.

## **Outreach**

The Rules of University Conduct are unique. Given the difficulties with heightened protest activity in AY23-24, the ORA sought to improve engagement with the community over the Rules and the activities of the ORA. The position of the ORA is that the balance the Rules seek to achieve is possible only if there is broad understanding of the Rules and if there is trust in Rules processes. The RA sought to enhance understanding of the Rules throughout the community and improve trust in processes through increasing transparency, beyond the development and expansion of the aforementioned website. To that end, the RA met with the Columbia College Student Council, the General Studies Student Council, the Columbia College Alumni Association, and the College's Board of Visitors. The RA also presented to and answered questions at the December plenary of the University Senate, at a Student Leadership Engagement Initiative session, at meetings of the Council of Deans, at an Arts and Sciences Faculty Meeting, and at a meeting of the staff of Undergraduate Student Life. The RA also met one-on-one with students, staff, and faculty to discuss concerns. Regular lines of communication were opened and maintained with deans of students and other student support professionals to provide clarification of the Rules and increase transparency about the progress of Rules processes. The ORA intends to make such meetings a frequent occurrence and to expand outreach efforts to more stakeholders in the community.

## **Areas for improvement and growth**

While significant advancements in Rules administration were achieved during AY24-25, there are multiple areas for improvement and growth. Education and outreach efforts should be expanded to promote transparency of Rules processes. With recent modifications to the Rules, it is important for the ORA to help provide clarity on these modifications (which it is working expeditiously to do).

When the UJB issues sanctions for respondents, the implementation of those sanctions involves working with the respondents' schools and other University offices. While communications with deans and deans of students improved, challenges remain in providing essential information to all relevant student-facing staff to enhance the efficiency and transparency of sanction implementation. The ORA will continue to develop positive working relationships with each school, especially for the purposes of helping individuals understand and navigate sanctions that arise from Rules processes that may impact academic work. The ORA will continue to work with University partners to streamline implementation of sanctions to avoid inefficiencies and confusion.

The central role that Delegates play in administering the Rules requires that they receive excellent training and guidance when monitoring demonstration activity. One of the new positions created for the ORA is a Delegate manager, who has worked to improve training, adding a particular focus on conflict resolution and de-escalation. The ORA is also developing a new organizational structure for Delegates that will involve Deputy Delegates who can help with the management of large protests. The ORA is also exploring ways to enhance understanding of the Delegate role. An important part of a Delegate's role is to provide advice during a demonstration on how to avoid Rules violations. It is essential that Delegates be treated with respect and not be viewed in an adversarial way, as was sometimes the case during demonstrations in AY24-25. The ORA hopes to partner with others in the University to ensure Delegates are treated with the same respect that every member of the University community deserves. This effort will also include emphasizing that Delegates partner with Public Safety in their roles administering the Rules and thus it is important that both Delegate and Public Safety directives be respected.