

# Oberlin College

## Nondiscrimination and Anti-Harassment Policy





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## **Nondiscrimination and Anti-Harassment Policy**

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## I. POLICY STATEMENT

Oberlin College and Conservatory (“Oberlin College”) is committed to creating an environment free from unlawful discrimination and harassment and complies with all applicable federal, state, and local laws regarding nondiscrimination. Oberlin College supports equal opportunity for all persons and prohibits discrimination or harassment on the basis of race, ethnicity, color, sex, religion, national origin, disability, age, genetic information, military or veteran status, ancestry, marital status, sexual orientation, gender identity, or gender expression. Oberlin College does not discriminate in access to or participation in any college program or activity including, but not limited to, admissions, academic programs, employment, or public accommodations. In addition, the College prohibits retaliation against anyone participating in or conducting an investigation into a reported violation of this policy.

Discrimination and harassment jeopardizes the mental, physical, and emotional welfare of community members, as well as the physical safety of our community. Discrimination and harassment diminishes an individual’s dignity and impedes their access to educational, social, and employment opportunities. It can permanently impact lives and may cause lasting physical and psychological harm. Discrimination and harassment violate our institutional values and their presence in the community presents a barrier to fulfilling the College’s scholarly, research, educational, artistic, and service missions. Discrimination and harassment, therefore, will not be tolerated at Oberlin College and is expressly prohibited. Anyone who is aware of discrimination or harassment by a College employee, student, trustee, volunteer, or contractor should promptly report such misconduct to the Director of the Office for Institutional Equity (“OIE”) or a Deputy Title IX & Equity Coordinator. Upon receiving a formal complaint to the OIE Director or a Deputy Title IX & Equity Coordinator, the College will promptly respond by taking the appropriate steps to eliminate discrimination or harassment, prevent its recurrence, and address its effects.

This policy provides information regarding the College’s prevention and education efforts related to discrimination and harassment, as well as how the College will proceed once it is made aware of reports of policy violations in keeping with our institutional values and our legal obligations under all applicable laws. The procedures for investigation, complaint resolution, and appeals are provided at [go.oberlin.edu/oie](http://go.oberlin.edu/oie).

This policy does not cover statements, written materials, research, or creative works that are determined by the instructor to be appropriate classroom,

research, or artistic subject matter. Nothing in this policy will be interpreted to violate individual constitutional rights of expression, to infringe academic freedom or freedom of academic inquiry, or to compromise the College's educational mission. Offensive speech alone is not legally sufficient to establish a violation of this policy. Expressive conduct must constitute discrimination or harassment as defined within this policy in order for a violation to occur.

Importantly, Oberlin College affirms its commitment to the transformative power of education while maintaining an equitable and safe living, learning, and work environment. This policy and related procedures are intentionally designed to draw on Oberlin's expertise as educators with knowledge of student development theories, inclusive community practices, and the dangers of the inappropriate exercise of positional authority. Reporting Parties, Responding Parties, and witnesses are therefore centered in these processes to encourage both individual agency and accountability while also affirming the College's responsibility to effectively eradicate discriminatory, harassing, or retaliatory conduct.

This policy uses they, them, and theirs as third person singular gender-neutral pronouns, in recognition that individuals have a range of gender identities and forms of self-identification.

This policy does not limit the rights of any individual to seek remedies that are available under federal or state law such as through the Equal Employment Opportunity Commission, the Department of Education's Office of Civil Rights, the Ohio Commission on Civil Rights, or the legal system.

Throughout this policy when the OIE Director is referred to, it is understood to mean the OIE Director or their designee. Ordinarily the designee will be a trained Deputy Title IX/Equity Coordinator. Any individual designated by the College as a Title IX/Equity Coordinator, investigator, decision-maker, or any person designated by the College to facilitate an adaptive resolution process, must not have a conflict of interest or bias with regard to a Reporting Party or Responding Party.

The following will not be considered evidence of bias:

- the OIE Director's initiation of a formal complaint, or an individual's decision that allegations warrant an investigation.
- An individual's current job title, professional qualifications, past experience, identity, or sex will not alone indicate bias.
- Use of trauma-informed practices will not be considered evidence of bias when such practices do not rely on stereotypes, apply generalizations to allegations in specific cases, or cause loss of impartiality or prejudgment of the facts at issue.

## II. DEFINITION OF DISCRIMINATION AND HARASSMENT

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For the purposes of determining whether a particular course of conduct constitutes discrimination or harassment under this policy, the following definition will be used:

Conduct that is based upon an individual's race, ethnicity, color, sex, religion, national origin, disability, age, genetic information, military or veteran status, ancestry, marital status, sexual orientation, gender identity, or gender expression that:

- A. adversely affects a term, condition or benefit of an individual's participation in a College program or activity or access to a College program or activity; or
- B. is a contributing factor in decisions affecting that individual's participation in or access to a College program; or
- C. has the purpose or effect of unreasonably interfering with an individual's participation in a College program or activity or creating an intimidating, hostile, offensive, or abusive environment that is so severe or pervasive to be intolerable to a reasonable person participating in that College program or activity.

### **Statement Prohibiting Disability Discrimination**

The College's commitment to diversity and inclusiveness extends to individuals with disabilities. The College has designated the Director of the Office for Institutional Equity as the Section 504/ADA Coordinator to manage the College's efforts to comply with the federal Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

Disability discrimination can occur whenever a qualified individual with a disability is denied the same equal opportunities afforded to other similarly situated individuals on the basis of their disability status. Under applicable disability laws, an individual with a disability is a person who: (1) has a physical or mental impairment that substantially limits one or more major life activities; (2) has a record of such an impairment; or (3) is regarded as having such an impairment. Temporary, non-chronic impairments that do not last for a long time and that have little or no long-term impact usually are not disabilities. The determination of whether an impairment is a disability is made on a case-by-case basis.

A qualified individual with a disability is a person who, with or without reasonable modifications to rules, policies or practices; the removal of architectural, communication or transportation barriers; or the provision of auxiliary aids or services, meets the essential requirements for the receipt of

services or participation in programs or activities provided by the College. The College is obligated to make a reasonable accommodation only to the known disability of an otherwise qualified individual. Generally, it is the responsibility of the individual to make the disability status and related need for an accommodation known to the appropriate College official. Information regarding campus resources for individuals with disabilities are available at [www.oberlin.edu/disability-access/resources](http://www.oberlin.edu/disability-access/resources).

**Retaliation Protection.** The College will take appropriate steps to ensure that a person who in good faith reports or participates in a report, investigation or resolution under the policy; or is accused of violating this policy will not be subjected to retaliation. This protection exists even if a complaint is dismissed or the Responding Party is not found to have violated this policy. The College will take appropriate steps to ensure that all participants in an investigation are treated fairly. Anyone who believes that he or she is experiencing retaliation is strongly encouraged to report this concern using the same procedures.

**Retaliation** is any adverse action against a Reporting Party, Responding Party, witness, or any other person participating in or conducting an investigation or resolution of a complaint that negatively alters the terms, conditions or benefits of that individual's equitable access to College programs or activities.

### III. SCOPE

The policy applies to all complaints of discrimination, harassment or retaliation not covered by the Title IX Sexual Harassment Policy that involves participants in a College program or activity regardless of the location. Oberlin College's Title IX Sexual Harassment Policy, as proscribed by Title IX of the Education Amendments Act of 1972, governs procedures for resolving reports of specific types of sexual harassment. If the conduct giving rise to an allegation of a violation of this policy also violates the Title IX Sexual Harassment Policy, the Investigator will conduct one investigation following the procedures outlined in the Title IX Sexual Harassment policy. One Hearing Panel/Officer will resolve the entire matter.

### IV. INVESTIGATION PROCEDURES

The College will investigate discrimination and harassment complaints under this policy to ensure prompt and equitable resolutions of complaints consistent with procedural guidelines developed by the OIE Director in consultation with the Vice President, General Counsel and Secretary, and Chief Human Resources Officer. Those procedures are available at [go.oberlin.edu/oie-investigation-procedures](http://go.oberlin.edu/oie-investigation-procedures).

## **A. Complaints**

All complaints of discrimination and harassment should be submitted in writing to the Director of the Office for Institutional Equity or one of the Deputy Title IX & Equity Coordinators.

Dr. Rebecca Mosely

Director of the Office for Institutional Equity/ Title IX Coordinator/Section 504 and ADA Coordinator

Carnegie Hall, Room 204

440-775-8555

Email: [OIE@oberlin.edu](mailto:OIE@oberlin.edu) or [Rebecca.Mosely@oberlin.edu](mailto:Rebecca.Mosely@oberlin.edu)

<https://www.oberlin.edu/institutional-equity>

## **Deputy Title IX & Equity Coordinators**

### **Athletics**

Deputy Title IX & Equity Coordinators are staff and faculty who have been authorized by the college to serve in the place of the Director of the OIE.

They have received training in identifying and responding to complaints.

More information on the current individuals holding these roles is available at [go.oberlin.edu/oie](http://go.oberlin.edu/oie)

**Anonymous Reports.** Anonymous reports of violations of this policy may be made to the **Campus Conduct Hotline 866-943-5787**. The hotline is staffed by a third-Party service and is available 24 hours/day and seven days a week. Please note that the College may not be able to resolve complaints received from anonymous sources unless sufficient information is furnished to enable the College to conduct a meaningful and fair investigation. The College will, however, take whatever steps it deems appropriate in the best interests of the overall College community, consistent with the information that is available.

## **B. Initial Assessment**

When the OIE receives a report of discrimination, harassment, and/or retaliation, the report is evaluated to determine whether the allegations are within the purview of any policy overseen by the OIE. To do so, the OIE Director will conduct an initial assessment during which they will evaluate the nature and circumstances of the report to determine whether the reported conduct is within the scope of a policy overseen by the OIE, whether the reported conduct if substantiated by a preponderance of the evidence standard could constitute prohibited conduct, and the appropriate manner of resolution under these procedures. The OIE may engage in a limited fact-gathering process to determine whether to initiate an investigation, to take other actions (such as Administrative Resolution or an Adaptive Resolution

Process), to refer the report to another office, or to dismiss the matter. The dismissal of a complaint during the initial assessment is final and not subject to appeal. Dismissal of a complaint does not prevent the college from providing appropriate support and education to parties involved in the complaint, or others affected by the reported conduct. Rather, the college will work with those involved in reports to ensure that they have support to maintain equitable access to the educational programs and activities of the college as appropriate.

**Administrative Resolution:** It may be determined after reviewing the complaint in the initial assessment, that the information is sufficient to show behavior that may reflect discrimination or harassment. The OIE Director in this case may work with the parties to determine if an Adaptive Resolution Process (ARP) is desired if it is deemed appropriate by the OIE Director. If it is not appropriate and/or desired, the OIE Director may choose to refer the matter to either Administrative Resolution or Formal Resolution. In cases of Administrative Resolution, the OIE Director in consultation with the appropriate offices/individuals will take the steps they deem necessary (which may include further investigation) to determine any actions and/or remedies that are warranted. Upon a decision by the OIE Director that Administrative Resolution is the appropriate method of resolution, Responding Parties who are Tenure/Tenure-track Faculty have the ability at that time to decline resolution through Administrative Resolution. In that event, the matter will be moved to a FRP. The Parties will be notified in writing of the decision to resolve the complaint through Administrative Resolution and any corrective actions or remedies that directly relate to the specific Party. The Administrative Resolution determination may be appealed in writing. If as a result of an appeal a complaint is moved to a FRP, the actions and/or remedies resulting from the Administrative Resolution will not be shared with the Hearing Panel/FRP Officer.

Appeals of Administrative Resolution determinations will follow the appeals procedures listed below in section E of this policy.

### **C. Adaptive Resolution Process**

The Adaptive Resolution Process (ARP) is a series of inclusive conflict resolution practices that attempt to yield participant-authored, effective, and just outcomes through examination of attitudes and behaviors that contributed to the conflict or harm; and that result in clear accountability measures that repair harm and discourage future harm. Adaptive dispute resolution practices—including education, conflict coaching, shuttle dialogue, facilitated dialogue, mediation, and restorative practices—may be available to participants on a voluntary basis. ARP is an alternative to the formal resolution process and does not result in College-mandated disciplinary action against the Responding Party. The College, however, will enforce any signed resolution agreement.

Upon request of the parties, the OIE Director will review the formal complaint to verify that both the ARP and the requested form of ARP are appropriate for the dispute. Both parties must provide written confirmation to the OIE Director that they wish to utilize ARP to resolve the complaint, and what process they wish to utilize as part of the resolution. Because ARP is voluntary, the College will not require any Party to participate in the ARP, or to agree to any specific method of resolution. The OIE Director is responsible for managing the ARP once it begins. Ordinarily the ARP will be completed within sixty (60) business days of the request for the ARP. A Party can request to end the ARP at any time if one of the following occurs:

- a. A Party fails to participate in or complete the ARP.
- b. The Parties cannot come to an agreement on what the outcomes of the ARP should be.
- c. A Party is reported to have additional new violations of College policy towards the other Party.
- d. All Parties agree in writing that the matter discussed in the formal complaint has been resolved to their satisfaction.

The OIE Director may end the ARP at any time if it is not being followed or is no longer appropriate as a manner to resolve the complaint. If the ARP is ended, then the Director of OIE will determine the appropriate process for resolving the complaint.

Once the ARP process is completed, the OIE Director will confirm in writing to both parties that the formal complaint has been resolved. Records of the resolution process will be maintained in the Office for Institutional Equity per the [OIE Record Retention Policy](#).

More information on ARP and other resolution processes can be found at [go.oberlin.edu/oie-adaptive-resolution](http://go.oberlin.edu/oie-adaptive-resolution).

#### **D. Formal Resolution Process**

The Formal Resolution Process (FRP) can be requested by one or more of the Parties or mandated by the College. The OIE Director is responsible for determining if the FRP is the appropriate process for resolving a complaint and is responsible for managing the FRP. The OIE Director will inform the parties of the reported policy violations, supportive measures available to them during the FRP, and procedures followed during the FRP. The FRP consists of an investigation and decision-making process to determine whether a Responding Party has violated College policy using the preponderance of the evidence standard. Under the FRP, Responding Parties are presumed not to have violated the policy unless sufficient evidence exists to show otherwise.

### **a. Investigations**

FRP Investigations are ordinarily conducted by a professional with training and/or experience in higher education and civil rights compliance. In all cases, the Investigator will respond to the report in a prompt, thorough, procedurally fair, and effective manner. The Investigator will conduct a fact-finding investigation, which includes meeting separately with the Reporting Party, Responding Party, and pertinent witnesses, and reviewing and analyzing other relevant information. The Investigator will prepare a written report at the conclusion of the investigation. Before the report is finalized, the participating Reporting Party and Responding Party will be given the opportunity to review and respond to the report.

Upon receipt of a complaint, the Investigator will strive to complete their investigation and submit to the parties a draft investigation report within 45 business days. Upon receipt of the draft report, the parties will have ten (10) business days to review and respond to the Investigator. The Investigator will submit a final investigation report to the Director of OIE within ten (10) business days of receiving the parties' comments unless further investigation is required. The final investigation report will be made available to the parties at least ten (10) days prior to the date of the hearing. The timelines outlined in the FRP may be extended for good cause by the OIE Director to ensure the integrity and completeness of the investigation, to accommodate the availability of witnesses, to address College breaks or vacations, or other legitimate reasons. Any extension of the timeframes, and the reason for the extension, will be shared with the parties in writing.

### **b. Advisor**

All parties are entitled to advice and support from an advisor during the FRP. In addition, the parties may consult with the OIE Director, who does not participate directly in formal resolution.

During the investigative process, the Reporting Party and the Responding Party may have an advisor present at any meeting with the Investigator. The parties may select their own advisor or may request an advisor who is a campus community member and has undergone Title IX and Equity training. An outside advisor will be required to meet with the OIE Director in advance of any participation in the proceedings to be informed about College expectations regarding the role of advisors.

The advisor may not be a witness in the matter and may not participate

directly in the investigative process but may be present to provide support to or advise the Reporting Party or Responding Party. The advisor may not speak on behalf of their advisee. All communication regarding the process must come from the advisee to the College. The advisor may not delay, disrupt, or interfere with any meeting or proceeding.

Attorneys serving as advisors must adhere to the expectations of the role as described in this policy. The FRP Coordinator/Director has the authority to determine what constitutes appropriate behavior on the part of an advisor and whether the person may remain in the proceedings. At no time will profanity, yelling, or otherwise unprofessional or abusive behavior be allowed.

### **c. Hearing/Decision Making Process**

Following receipt of the final investigation report, the FRP Officer will send a Notice of Charge Letter to both the Reporting Party and the Responding Party. The Notice of Charge Letter provides each Party with a brief summary of the conduct at issue, the specific policy violation(s) that are alleged to have taken place, and the expected schedule for resolving the complaint.

In cases where there is a hearing, all hearings will be live via video conferencing. Before the hearing, the FRP Coordinator/Officer will schedule a meeting with the parties to explain the hearing procedures and request any information that is needed from them before the hearing. More information about FRP procedures can be found at [go.oberlin.edu/oie-formal-resolution](http://go.oberlin.edu/oie-formal-resolution).

A Party may choose not to participate in a hearing/decision making process or to respond to questions. It is important to note that doing so may limit the hearing panel's ability to assess the credibility of the Party and the evidence they provided.

**Standard of proof.** The FRP Panel's/Officer's findings will be made using the *preponderance of the evidence* standard. This standard requires that the information supporting each finding be more convincing than the information offered in opposition to it. Under this standard, individuals are presumed not to have engaged in the conduct reported unless a preponderance of the evidence supports a finding that discrimination, harassment or retaliation occurred.

#### **d. Corrective action**

Corrective action is designed to restore or preserve equitable access to College programs and activities while honoring the College's educational mission. Corrective actions also serve to promote safety or to deter future threatening or harmful behavior. Some behavior is so harmful to the College community or so deleterious to the educational process that it may require more serious sanctions, such as removal from College housing, specific courses, job duties, or activities; suspension from the College; or expulsion/employment termination. Additional information regarding possible corrective action is described at [go.oberlin.edu/oie-corrective-action](http://go.oberlin.edu/oie-corrective-action).

If the Hearing Panel/FRP Officer determines that the Responding Party committed the alleged misconduct, the College will take action to address the behavior, prevent the recurrence of that misconduct, and remedy its effects.

Once a decision has been finalized, the Hearing Panel/Officer will issue a statement containing the findings and sanctions including the rationale used to determine both within five (5) business days to the Reporting and Responding Parties and the OIE Director.

**Dual roles.** When the Responding Party holds a role within the College in addition to that of a student (e.g., student-employee), the sanctions may apply to all roles held by the student provided there is a sufficient nexus between the alleged conduct and the position held by the student. If the student-employee is found to have engaged in misconduct in their employment capacity, the student-employee may be subject to sanctions both in connection with their employment and their student status.

#### **e. Appeals**

Parties may appeal the outcome or corrective actions imposed. The appeal must be submitted within five (5) business days of receiving the OIE Director's/Hearing Panel's/Officer's decision letter. A Party must submit a written appeal to the OIE Director who will appoint a trained appeals officer.

- 1. Grounds for Appeal.** A Party may only seek appeal on the findings under the following grounds:
  - a.** A material deviation from the procedures affected the outcome of the case;
  - b.** There is new and relevant evidence that was not reasonably available when the determination of responsibility was made

- that affected the outcome;
- c. There is a conflict of interest or bias on the part of the OIE Director, investigator, or decision-maker(s) that affected the outcome of the matter. An individual's past education or professional experience alone is insufficient to establish a conflict of interest or bias; or
- d. The corrective actions are not appropriate or disproportionate to the determined violation(s).

The Parties will be notified if a Party submits an appeal and will be informed of the grounds of the appeal. A Party may submit a short, written response to the appeal within five (5) business days of this notification.

2. **Appeal Procedure.** In any request for an appeal, the burden of proof lies with the Party requesting the appeal, as the original determination and corrective actions are presumed to have been decided reasonably and appropriately. The Appeals Officer will review the record, the information submitted on appeal and issue a written report that may result in the following outcomes:
  - a. If there was a material deviation from procedure that affected the outcome, the Appeals Officer may refer the matter to the OIE Director for Administrative Action appeals or the Hearing Panel/FRP Officer for FRPs to rectify the error, or in rare cases where the error cannot be resolved, a new process will be ordered.
  - b. If there was new and relevant evidence that was not reasonably available when the determination of responsibility was made that affected the outcome, the Appeals Officer can recommend that the case be returned to the appropriate decision maker(s) to assess the weight and effect of the new information and render a determination after considering the new facts.
  - c. If a conflict of interest or bias on the part of the OIE Director, investigator, or decision-maker affected the outcome, the Appeals Officer will take the necessary steps to rectify the conflict or bias.
  - d. If the corrective action(s) are deemed inappropriate or disproportionate, the Appeals Officer will alter the corrective action(s), accordingly.
  - e. The Appeals Officer may affirm the findings and corrective action(s).

The Appeals Officer will issue a written decision on the appeal simultaneously to the Parties and the OIE Director within ten (10) business days from the date of the submission of all appeal documents by the Parties. Decisions of the Appeals Officer are final.

## **V. OTHER PROVISIONS**

**Confidentiality Concerns.** The Office for Institutional Equity responds to all reports of policy violations and implements prompt and effective remedial action in response to violations and, therefore, cannot promise confidentiality. The College handles all matters professionally and discreetly by sharing information only with those who need to know and by informing participants of those disclosures. The College maintains the privacy of student records in compliance with the federal Family Educational Rights and Privacy Act (“FERPA”).

**Confidential Reporting.** The College recognizes that deciding whether to report discrimination, harassment or retaliation can be difficult. All individuals are encouraged to seek the support of trained professionals on campus and in the local community. These professionals can provide guidance in making decisions, information about available resources and procedural options, and assistance in the event that a report and/or resolution under this policy is pursued. As detailed online at [www.oberlin.edu/institutional-equity](http://www.oberlin.edu/institutional-equity), there are Confidential and Privileged Resources which under Ohio law cannot share information without the consent of the individual seeking assistance. Short-term and free counseling provided by licensed psychologists and counselors is available to registered students.

**No time limits for reporting.** The College strongly encourages Reporting Parties to make reports as soon as possible. Timely reporting enables the College to provide greater options for support, investigation, and resolution, especially as it relates to crisis counseling, the preservation of evidence, and security and law enforcement responses. The lapse of time may make it more difficult to gather relevant information and prevent similar misconduct. The College does not, however, limit the time frame for reporting for incidents within the scope of this Policy. Reports of incidents occurring outside of the scope of this policy (e.g., individuals are no longer participants in a College program and activity) will be reviewed but may not be investigated under this policy.

**Intentionally and knowingly filing a false report.** Individuals should not be discouraged from reporting discrimination, harassment, or retaliation under this policy simply because there appears to be a lack of corroborating evidence. Appropriate interventions may be available and warranted even in the absence of a finding of a policy violation. However, any member of the College community who knowingly or recklessly files a false complaint or provides false information under this policy or intentionally misleads College officials who are investigating or reviewing a complaint of alleged discrimination, harassment or retaliation may be subject to disciplinary action. This does not apply to reports made in good faith, even if the facts alleged in the Complaint cannot be substantiated by an investigation. Similarly, disagreement with the information reported by the reporting Party does not on its own indicate a violation of this section of the policy.

**Education and training.** Oberlin College offers regular prevention programs and ongoing education programs for all students and employees. All new and transfer students and all new employees will receive education on non-discrimination and anti-harassment, including separate Title IX Sexual Harassment training, within three months of their enrollment or appointment. All continuing employees are expected to complete non-discrimination and anti-harassment training, including Title IX Sexual Harassment training, on an annual basis. The Office for Institutional Equity will provide all continuing students and employees with opportunities for education on new policies and best practices for creating diverse, equitable, inclusive communities of excellence.

Members of the College community are encouraged to contribute to the prevention, intervention, and effective response to discriminatory, harassing, or retaliatory conduct. All members of the community may play a role in building a safe and just educational environment by:

- Modeling healthy and respectful behavior in personal and professional relationships;
- Increasing personal awareness of what constitutes discrimination, harassment, or retaliation;
- Speaking out against behavior that encourages intolerance or discriminatory, harassing or retaliatory actions or that discourages reporting;
- Developing the necessary skills to be an effective and supportive ally to community members negatively impacted by harmful conduct;
- Intervening in situations that can lead to violations of this policy, and
- Interrupting an incident of misconduct when it is safe to do so.

**Policy review.** The OIE Director will update the policy to keep information accurate and ensure compliance with the law. When the OIE Director conducts a full policy review, they will seek input from members of the campus community and, if necessary, will recommend revisions to the senior administration and the Chief Human Resources Officer.

**Policy distribution.** It is the responsibility of the Office for Institutional Equity to advise the campus community of this policy on its website and to provide all community members with access to this policy; to provide all faculty, staff, and students with a notification of the policy on an annual basis through email; and to conduct trainings on an annual basis. It is the responsibility of the Office of Admissions and Financial Aid to advise all applicants and admitted or transfer students of this policy on its website and provide all admitted students with access to this policy. It is the responsibility of the Office of Human Resources to advise all employees, volunteers, and contractors of this policy on its website and provide all new employees and volunteers with access to this policy. It is the responsibility of the Office of the Dean of Students to advise all students of this policy on its website.

**Complaints or concerns.** Students, employees, or other individuals may direct complaints or concerns about this Nondiscrimination and Anti-Harassment Policy to the OIE Director, a Deputy Title IX & Equity Coordinator, and/or to the following external agencies:

**U.S. Department of Education Office for Civil Rights**

Office for Civil Rights Cleveland Office

1350 Euclid Avenue, Suite 235

Cleveland, OH 44115

(216) 522-4970

TTY: (800) 877-8339

Email: [OCR.Cleveland@ed.gov](mailto:OCR.Cleveland@ed.gov)

Website: [www2.ed.gov/about/offices/list/ocr/index.html](http://www2.ed.gov/about/offices/list/ocr/index.html)

**U.S. Equal Employment Opportunity Commission**

Cleveland Field Office

Anthony J. Celebrezze Federal Building

1240 E. 9th Street, Suite 3001

(800) 669-4000

TTY: 1-800-669-6820

ASL Video Phone: 844-234-5122

Email: [info@eeoc.gov](mailto:info@eeoc.gov)

Website: [www.eeoc.gov/field-office/cleveland/location](http://www.eeoc.gov/field-office/cleveland/location)

**Ohio Commission on Civil Rights**

Cleveland Regional Office

Lausche State Office Building

615 W. Superior Ave., Suite 885

Cleveland, OH 44113

(216) 787-3150

TTY: (614) 752-2391

Website: <https://crc.ohio.gov/Home.aspx>

**Effective date.** This policy is effective August 30, 2024, and supersedes any and all previous, discrimination or harassment policies that may have been in effect in any written or electronic format previously.



