Northwest University
Discrimination Grievance Procedures

1. **Purpose**. The purpose of these Discrimination Grievance Procedures ("***Procedures***") is to provide a prompt and fair resolution of complaints or reports of discrimination, harassment, or retaliation in violation of Northwest University's Nondiscrimination and Harassment Policy ("***Nondiscrimination Policy***"). Any person who believes he or she has been discriminated against, harassed, or retaliated against in violation of the Nondiscrimination Policy is encouraged to file a complaint or a report with Northwest University (the "***University***").

   1.1 **Procedures used to address all complaints of discrimination, harassment, and retaliation (other than complaints covered by the Sexual Harassment Policy (Title IX).** Except for reports of sexual harassment covered by the Sexual Harassment Policy, these Procedures are used to address all complaints and reports of alleged discrimination, harassment, or retaliation, whether based on race, color, national origin, sex, age, disability, or genetic information.

   1.2 **Sexual violence reports.** In the case of complaints involving sexual violence or sexual harassment not covered by the University's Sexual Harassment Policy or the Sexual Harassment Grievance Process (Title IX) (for example, an incident that occurs outside of the United States), then these Procedures may apply. For complaints of non-Title IX sexual harassment (including sexual violence), please also review the Nondiscrimination Policy regarding available resources.

   1.3 **Definitions.** The terms "***discrimination***," "***harassment***," "***retaliation***," "***sexual harassment***," "***Title IX***," and other relevant terms are defined in the Nondiscrimination Policy, which is available at https://www.northwestu.edu/title-ix.

2. **Making complaints and reports**. Please see Section 2 of the Nondiscrimination Policy for information about how, when, and where to file a complaint. Generally, reports are filed with one of the EO Grievance Officers. Reports regarding sexual violence or sexual harassment should be reported to the Title IX Coordinator. Contact information for the Title IX Coordinator and EO Grievance Officers is below:

Title IX Coordinator/EO Grievance Officer (Amanda Bowman)
(425) 889-7824
amanda.bowman@northwestu.edu
Barton, office 215

Deputy Title IX Coordinator (Rose Bryson)
(425) 889-5598
rose.bryson@northwestu.edu
Barton, office 214

Deputy Title IX Coordinator/Hearing Officer (Rick Engstrom)
(425) 889-6397
rick.engstrom@northwestu.edu
Pecota, office 105

Deputy Title IX Coordinator/EO Grievance Officer (Larissa Lilly)
(425)-889-5319
larissa.lilly@northwestu.edu
Pecota, office 114

Equal Opportunity Grievance Officer (Ryan Colombe)
(425) 889-5289
ryan.colombe@northwestu.edu
Student Development Office

Equal Opportunity Grievance Officer (Janet Dubois)
(425) 889-5734
janet.debois@northwestu.edu
HSC, office 218

Equal Opportunity Grievance Officer (Allie Flynn)
(425) 889-5582
allie.flynn@northwestu.edu
Barton, office 105

Equal Opportunity Grievance Officer (Gary McIntosh)
(425) 889-7790
gary.mcintosh@northwestu.edu
Barton, office 103

Equal Opportunity Grievance Officer (Todd Nelson)
(425) 889-5340
todd.nelson@northwestu.edu
Barton, office 236

Equal Opportunity Grievance Officer (Sara Rodriguez)
(425) 889-6312
sara.rodriguez@northwestu.edu
6710, office 305

Equal Opportunity Grievance Officer (Jimmy Steininger)
(425) 889-5230
jimmy.steininger@northwestu.edu
Registrar's Office

Equal Opportunity Grievance Officer (Ben Thomas)
(425) 889-7821
ben.thomas@northwestu.edu

Barton, office 285

Equal Opportunity Grievance Officer (Regan Thomas)
(425) 889-5732
regan.thomas@northwestu.edu
Student Development Office

Equal Opportunity Grievance Officer (Emma Unruh)
(425) 889-5288
Emma.unruh@northwestu.edu
Student Development Office

3. **Confidentiality of complaints and reports**. The person who is the victim identified in a complaint or report ("***Complainant***") and the person accused of violating the Nondiscrimination Policy ("***Respondent***") may have certain privacy rights or concerns. The complaint, report, investigation, and results will be kept confidential and shared only with the Complainant, the Respondent, witnesses (as deemed appropriate), and any employee or agent of the University with a reasonable need to know the information (for example a supervisor, the Title IX Coordinator, Director of Human Relations, the President, and outside counsel). This does not necessarily mean the Complainant and Respondent have full access to all information gathered in the investigation. If the Complainant has concerns about having the Complainant's identity or complaint or report disclosed to the Respondent, then the EO Grievance Officer should attempt to address those concerns. The University may also disclose any information or documents as permitted by the Family Educational Rights and Privacy Act ("***FERPA***"), as required by law, or as necessary or appropriate to make a report to any law enforcement agency. The University will make every reasonable effort to comply with a victim's desires for confidentiality.

4. **Role of EO Grievance Officers**. The EO Grievance Officer is not an advocate for either the Complainant or the Respondent. The EO Grievance Officer has the following primary responsibilities:

   4.1 to receive any reports or complaints of discrimination, harassment, or retaliation;

   4.2 to provide information to the Complainant, as appropriate, about medical services, mental health or counseling services, victim advocacy, legal assistance, and information about filing a police report (when there is an allegation that a crime has been committed);

   4.3 to explain these Procedures to the Complainant and the Respondent, including the informal and formal processes and appeal rights, and to remind the parties and witnesses of the policy against retaliation;

   4.4 to investigate complaints or reports of alleged discrimination, harassment, or retaliation, including reports from third parties;

4.5 to present findings and recommend appropriate remedies, sanctions, or corrective action to those responsible for making decisions about those matters; and

4.6 to fulfill all other duties given to the EO Grievance Officer under these Procedures.

5 **Immediate action and interim measures**. The University may take interim measures to assist or protect the parties during these Procedures, as appropriate (and with the Complainant's consent, if deemed appropriate). These interim measures for a student Complainant may include a no-contact requirements imposed on the Respondent or on both parties, obtaining counseling, temporarily rearranging class schedules or class requirements (whether for the Complainant or Respondent), and other appropriate actions. Interim measures may be imposed unilaterally, at any time. Initiation of interim measures does not require law enforcement notification.

6 **Resolution – Informal Process**.

6.1 **Agreement to attempt an informal resolution**. If the Complainant, Respondent, and EO Grievance Officer all agree that an informal resolution should be pursued, then the EO Grievance Officer (or his or her designee) will help facilitate a resolution that is mutually acceptable to all parties and the EO Grievance Officer. An EO Grievance Officer should carefully consider whether the informal process is appropriate for any complaint involving sexual violence, even if the Complainant and Respondent agree. The EO Grievance Officer is only required to investigate the allegations to the extent useful to resolve the matter and to the extent necessary or appropriate to protect the University and the other members of the campus community. In most cases, an informal investigation should be completed within 20 days after all parties agree to pursue an informal resolution. If more time is needed to investigate, both parties should be told of the need for additional time, with an estimate of when the informal investigation might be completed.

6.2 **Ending the process before resolution; initiating the formal process**. Either party or the EO Grievance Officer may end the informal process at any time. Either party may request the start of the formal process. The EO Grievance Officer (on his or her own initiative) may start the formal process at any time.

6.3 **Simultaneous notification of outcome.** Both the Complainant and Respondent will receive written notification about the outcome of the informal process at the same time and will be reminded about the availability of the formal process.

6.4 **Informal resolution.** An informal resolution must adequately address the Complainant's concerns, the Respondent's rights, and the University's intent to stop, remedy, and prevent the discrimination, harassment, and retaliation prohibited by the University' Nondiscrimination Policy.

7 **Resolution – Formal process**.

7.1 **Step 1**: **Meeting with the parties; interim action (if appropriate)**. The EO Grievance Officer will meet with the Complainant to understand the allegations and concerns and explain these Procedures. The EO Grievance Officer will also meet with the Respondent to understand the Respondent's position and explain these Procedures. The EO Grievance Officer will also take any immediate action and impose any interim measures that might be appropriate. Immediate action and interim measures may be imposed by the EO Grievance Officer at any time, and not just at Step 1. If the allegation does not involve an alleged violation of the Nondiscrimination Policy, the Grievance Officer will refer the matter to the appropriate department or staff member, if any. Please see Section 9 of the Nondiscrimination Policy regarding the obligation to provide interim measures in complaints involving sexual violence.

7.2 **Step 2**: **Investigation, findings, and recommendations**. The EO Grievance Officer will conduct or oversee a fair and impartial investigation of the alleged discrimination, harassment, or retaliation. The EO Grievance Officer may delegate the investigation to a designated investigator, who will be identified to both parties. The investigator may be an employee of the University or an outside investigator (including an attorney). References to the EO Grievance Officer also include any designated investigator. Only a trained investigator will conduct the investigation. Typically, the investigation should be completed within 20 days of receipt of the complaint. If more time is necessary, the EO Grievance Officer will notify both parties about when to expect completion of the investigation.

A. The EO Grievance Officer may request a written statement from the Complainant regarding the allegations, including the identity and contact information for any witnesses and a description and copy of any evidence (for example a copy of letters, emails, text messages). The written statement is not necessary for an investigation, and any written statement need not be shared with the Respondent. If shared, it may be summarized or redacted, as deemed appropriate by the EO Grievance Officer.

B. The EO Grievance Officer will examine any evidence and interview witnesses (and may request written statements from witnesses). The EO Grievance Officer may structure the investigation and schedule interviews as the EO Grievance Officer deems appropriate and is not bound to conduct the investigation in any particular sequence. For example, the EO Grievance Officer may decide to interview the Respondent before interviewing witnesses or may decide to interview the Respondent after completing most of the investigation. The EO Grievance Officer may also have more than one interview with the parties or the witnesses.

C. The EO Grievance Officer will meet with the Respondent and present the allegations. The EO Grievance Officer need not disclose the name and contact information of witnesses, if deemed appropriate. The Respondent will have an opportunity to respond to the allegations and evidence and may identify witnesses and evidence. The EO Grievance Officer may

request a written statement from the Respondent, including responses to specific allegations. A written response is not necessary for an investigation and need not be shared with the Complainant. If shared, it may be summarized or redacted, as deemed appropriate by the EO Grievance Officer.

D. The EO Grievance Officer will prepare a draft investigation report (which at this stage will not include findings or recommendations). Both Complainant and Respondent will have an opportunity to review and respond to the draft report. The EO Grievance Officer may set a deadline for receiving responses from the parties (usually at least 3 business days).

E. The EO Grievance Officer will then evaluate the evidence gathered, take into consideration the comments received from the Complainant and Respondent, and determine whether there is a "preponderance of the evidence" that the Respondent violated the Nondiscrimination Policy. The Respondent is presumed not to have violated the policy unless a "preponderance of the evidence" supports a finding that a violation occurred. The term "***preponderance of the evidence***" means the evidence supporting a finding is more convincing than the evidence in opposition to it. The EO Grievance Officer may find that a preponderance of the evidence exists for one finding, but not for another. In considering whether a hostile environment exists, the EO Grievance Officer will look at the totality of the circumstances, considering not only whether the conduct was unwelcome to the Complainant, but also whether a reasonable person in the Complainant's situation would have perceived the conduct as objectively offensive.

F. The EO Grievance Officer will then prepare a final investigation report, including findings and recommendations (if any). The EO Grievance Officer's final investigation report will be provided to Complainant and Respondent at the same time, along with information about the appeal procedure.

1) If the Respondent is an employee, a copy of the report will be given to the Director of Human Resources and the Respondent's Area VP. "***Area VP***" means the University's Provost, the University's Chief Financial Officer ("***CFO***"), and any other University vice president or equivalent position reporting directly to the President.

2) If the Respondent is a student, a copy of the report will be given to the VP of Student Development and the Provost.

3) If the complaint involves sex discrimination (including sexual harassment or sexual violence), the report will also be provided to the Title IX Coordinator.

G. An investigation based on an anonymous complaint or report will be modified by the EO Grievance Officer to the extent necessary, with the goal of conducting a fair and impartial investigation.

H. Either party may appeal the investigation, findings, or recommendations within 5 business days after receipt of the report. A "***business day***" is any day other than a Saturday, Sunday, or state or federal holiday when the University is open for business. The appeal procedures are described in *Section 7.4*.

7.3 **Step 3 (where there is no appeal)**: If there is no notice of appeal filed within the permitted time period, and if there is a finding by a preponderance of the evidence that the Respondent violated any part of the Nondiscrimination Policy, then the following occurs:

A. If the Respondent is a student, the report, findings, and recommendations will be sent to the Chair of the Judicial Council for review by the Judicial Council. The process will then follow the judicial process outlined in the Community Handbook, except that the Judicial Council will not engage in any investigation or fact-finding related to the findings. The role of the Judicial Council is to impose appropriate sanctions. The Judicial Council may accept, modify, or reject any of the recommendations of the EO Grievance Officer. The Judicial Council may interview or meet with the Complainant, the Respondent, or any witnesses, and may review any evidence for purposes of deciding the appropriate sanction, but the Council is not required to do any of these things in order to impose any sanction. The Council may also ask the Respondent and the Complainant to provide a statement of impact, in person or in writing for purposes of deciding the appropriate sanction. If the Council interviews or meets with one party or asks one party for a statement, then the other party must also be given the same opportunity. Once the Council has assigned sanctions (if any), the Chair of the Judicial Council will prepare a written decision and provide a copy to the Complainant, Respondent, EO Grievance Officer, and Title IX Coordinator (for complaints involving sex discrimination, including sexual harassment or sexual violence). Either party may appeal the Council's sanctions (if any) to the Administrative Judicial Council. Findings may not be appealed to the Administrative Judicial Council. The Administrative Judicial Council may interview or meet with the Complainant, the Respondent, or any witnesses, and may review any evidence for purposes of reviewing the appropriateness of any sanction, but the Administrative Judicial Council is not required to do any of those things in order to decide the appeal of any sanction. The process for filing appeal is described in the Community Handbook. If the EO Grievance Officer would usually sit on the Judicial Council, the EO Grievance Officer will recuse himself or herself from the Judicial Council.

B. If the Respondent is a faculty member, the report, findings, and

recommendations, if any, will be reviewed and acted on by the Provost. The Provost may accept some, all, or none of the recommendations, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Provost may interview the Complainant, the Respondent, or any witness, and may review any evidence, but the Provost is not required to do any of those things. However, if the Provost interviews one party, then the other party must also be interviewed. The Provost will prepare a written decision and provide a copy to the Complainant, Respondent, and EO Grievance Officer, and, for complaints involving sex discrimination (including sexual harassment or sexual violence), the Title IX Coordinator. Either party may appeal the Provost's decision to the President under *Section 7.5*. If the Provost is the Respondent, then the President will fulfill the duties of the Provost under this section. Decisions of the President regarding the Provost may not be appealed. If the President is the Respondent, then the Chair of the Board of Trustees will fulfill the duties of the President under this section.

C. If the Respondent is an employee other than a faculty member, the report, findings, and recommendations will be provided to the Director of Human Resources (if the Director is not the EO Grievance Officer) and also the Respondent's Area VP. After reviewing the report, findings, and recommendations and consulting with the Director of Human Resources, the Area VP will act on the recommendations, and may accept some, all, or none of the recommendations, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Area VP may interview the Complainant, the Respondent, or any witness, and may review any evidence, but is not required to do any of those things. However, if the Area VP interviews one party, then the other party must also be interviewed. The Area VP will prepare a written decision and provide a copy to the Complainant, Respondent, EO Grievance Officer, and, for complaints involving sex discrimination (including sexual harassment or sexual violence), the Title IX Coordinator. Either party may appeal the Area VP's decision to the President, under *Section 7.5*. If the Area VP is the Respondent, then the President will fulfill the duties of the Area VP under this section. Decisions of the President regarding an Area VP may not be appealed.

7.4 **Step 3 (where there is an appeal)**: If either party appeals from **Step 2**, then the following occurs:

A. The appeal from **Step 2** must be made within 5 business days after receipt of the EO Grievance Officer's report. The notice of appeal must be filed with the EO Grievance Officer. The EO Grievance Officer may grant a reasonable extension of time for good reason, but generally, no extensions will be granted.

1) Contents of notice. The notice must be in writing (or in a pdf attachment to an email). The notice must describe the appellant's

desired outcome, and a description of why the EO Grievance Officer's report is unfair or inappropriate. The EO Grievance Officer will provide a copy of the notice to the other party and the Title IX Coordinator (in cases involving sex discrimination, including sexual harassment and sexual violence).

2) Appeals by Respondents who are students or faculty members will be heard by the Provost or designee. Appeals by Respondents who are employees (other than faculty members) will be heard by the Respondent's Area VP. If the Provost or Area VP is the Respondent, then the appeal will be heard by the President. The person hearing the appeal is referred to as the "***Reviewing Officer***."

3) Within 3 business days after receipt of the notice of appeal, the EO Grievance Officer will provide the Reviewing Officer a copy of the notice of appeal and the report. The EO Grievance Officer will also contact the appealing party and request the following information be provided to the Reviewing Officer and the EO Grievance Officer (and the Title IX Coordinator in cases involving sexual violence) within 5 business days after receipt of the request by the appealing party:

   a) a detailed statement of facts relevant to the complaint or report of discrimination, harassment, or retaliation;

   b) the names of witnesses and their anticipated testimony;

   c) copies of any relevant documents or other evidence;

   d) any other information the party believes is relevant for the Reviewing Officer to consider; and

   e) the reason any finding, remedy, or recommendation is or not appropriate; and

   f) what the finding, remedy, or recommendation should or should not be, and why.

B. The EO Grievance Officer will provide a copy of an appealing party's submission to the other party. The EO Grievance Officer may redact names and other information and may summarize the submission, if deemed appropriate to help protect privacy or confidentiality concerns. The other party may provide a written response within 5 business days after receiving the appealing party's statement. The responding party is not required to provide a written response, but should consider providing:

1) a detailed statement of facts relevant to the complaint or report of discrimination, harassment, or retaliation, and any response to the appealing party's statement of facts;

2) the names of witnesses and their anticipated testimony;

3) copies of any relevant documents or other evidence;

4) any other information the party believes is relevant for the Reviewing Officer to consider;

5) the reason any finding, remedy, or recommendation is or is not appropriate; and

6) what the finding, remedy, or recommendation should or should not be, and why.

C. The Reviewing Officer will interview both parties and any identified witnesses. The parties may not have legal counsel present at the interview. But in a matter involving dating violence, domestic violence, sexual assault, or stalking, the parties may bring an advisor (meaning an individual who provides support or counsel) of their choice. The Reviewing Officer will determine the permitted level of involvement by the advisor, with limitations applying equally to both parties. Legal counsel for the University may be present to assist the Reviewing Officer regarding the conduct of the interview. The Reviewing Officer may limit information presented if it does not appear to be reasonably related to whether or not a violation of the Nondiscrimination Policy occurred. The interview process is not open to the public.

D. Within 10 business days after the completion of all interviews, the Reviewing Officer should simultaneously submit a decision in writing to the parties, the EO Grievance Officer, and the VP of Student Development (in the case of a student Respondent), the Director of Human Resources (in the case of an employee Respondent), and the Title IX Coordinator in any matter involving sex discrimination, including sexual harassment or sexual violence. The written decision should contain the following :

1) a summary of the allegations;

2) summary of the response to the allegations;

3) a statement of the relief sought by the Complainant, if known, and the recommendations, if any, of the EO Grievance Officer;

4) the portion of the Nondiscrimination Policy alleged to have been violated;

5) an analysis of the EO Grievance Officer's investigation report, including findings and recommendations;

6) the Reviewing Officer's findings and decision regarding remedies for the Complainant and sanctions or corrective action for the Respondent (except in any case where the Respondent is a student, the sanctions and corrective action will be recommendations for the Judicial Council); and

7) information about the opportunity to appeal the Reviewing Officer's findings and decision to the President (see *Section 7.5*). In the case of a student Respondent, the sanctions (if any) will be determined by the Judicial Council. A student Respondent does not have an appeal right under *Section 7.5*. Instead, the student may appeal sanctions as permitted by the Community Handbook and *Subsection 7.4E*.

E. If the Respondent is a student, EO Grievance Officer's report, findings, and recommendations and the Reviewing Officer's findings and recommendations will be sent to the Chair of the Judicial Council for review by the Judicial Council. The process will then follow the judicial process outlined in the Community Handbook, except that the Judicial Council will not engage in any investigation or fact-finding related to the findings. The role of the Judicial Council is to impose appropriate sanctions. The Judicial Council may accept, modify, or reject any of the recommendations of the Reviewing Officer. The Judicial Council may interview or meet with the Complainant, the Respondent, or any witnesses, and may review any evidence for purposes of deciding the appropriate sanction, but the Council is not required to do any of these things in order to impose any sanction. The Council may also ask the Respondent and the Complainant to provide a statement of impact, in person or in writing for purposes of deciding the appropriate sanction. If the Council interviews or meets with one party or asks one party for a statement, then the other party must also be given the same opportunity. Once the Council has assigned sanctions (if any), the Chair of the Judicial Council will prepare a written decision and provide a copy to the Complainant, Respondent, EO Grievance Officer, the Reviewing Officer, and Title IX Coordinator (for complaints involving sex discrimination, including sexual harassment or sexual violence not covered by the Sexual Harassment Policy or the Sexual Harassment Grievance Process (Title IX)). Either party may appeal the Council's sanctions (if any) to the Administrative Judicial Council. Findings may not be appealed to the

Administrative Judicial Council. The Administrative Judicial Council may interview or meet with the Complainant, the Respondent, or any witnesses, and may review any evidence for purposes of reviewing the appropriateness of any sanction, but the Administrative Judicial Council is not required to do any of those things in order to decide the appeal of any sanction. The process for filing appeal is described in the Community Handbook. If the EO Grievance Officer would usually sit on the Judicial Council, the EO Grievance Officer will recuse himself or herself from the Judicial Council. If the Reviewing Officer would usually sit on the Administrative Judicial Council, the Reviewing officer will recuse himself or herself from the Administrative Council.

7.5 **Appeal Procedure**. This appeal process applies to an appeal of any decision made under *Sections 7.3* or *7.4*). Decisions of the Area VP may be appealed to the President. Decisions of the President under *Sections 7.3* or *7.4* regarding any Area VP as a Respondent may not be appealed. Respondents who are students do not have an appeal right under this *Section 7.5*, but have the appeal rights described in *Subsection 7.4E* and the Community Handbook.

A. The notice of appeal must be filed with the EO Grievance Officer and the President by the appealing party within 5 business days after receipt of the decision by the Reviewing Officer. The notice of appeal must contain a statement describing the appellant's desired outcome and why the decision is unfair. The EO Grievance Officer will provide a copy of the notice to the non-appealing party, and will also provide the President a copy of the investigation report and the Reviewing Officer's decision.

B. Within 5 business days after receipt of the notice of appeal, the non-appealing party may submit a statement responding to the notice of appeal. This response must be filed with the EO Grievance Officer and the President. The EO Grievance Officer will provide a copy of the response to the appealing party.

C. The President will review all submitted documents, including the EO Grievance Officer's report, the Reviewing Officer's decision, the notice of appeal, the statement of the appealing party, and the response to the statement of the appealing party. The President may interview the Complainant, the Respondent, and any witness, and may review any evidence, but is not required to do any of those things. But if the President interviews one party, then the other party must also be interviewed. The President may accept, reject, or modify the decision of the Reviewing Officer, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The President will issue a written decision and will provide a copy to the parties, the EO Grievance Officer, the Reviewing Officer whose decision was appealed, the VP of Student Development (when the Complainant is a student), the Director of Human

Resources (when either party is an employee), and the Title IX Coordinator for any matter involving sex discrimination, including sexual harassment or sexual violence. The President's decision is final and may not be appealed.

7.6 **President as Respondent**. If the President is the Respondent, then Barbara Petty, the Chair of the Board of Directors fulfills the duties of the President under these Procedures. Any decision of the Chair regarding the President may not be appealed, subject to the President's rights under the University's Articles of Incorporation or Bylaws or employment agreement. For example, the President's contract or the University's Articles or Bylaws may provide that only the Board of Directors may terminate the President's employment.

8. **Interpretation of these Procedures**. The President may interpret or clarify these Procedures as the President deems appropriate to accomplish the intent of these Procedures. If the President is the Respondent, then the Chair may interpret or clarify these Procedures as the Chair deems appropriate to accomplish the intent of these Procedures.

9. **These Procedures do not change "at-will" employment or employment for a term.** Nothing in these Procedures changes the "at-will" employment policies of the University. Employees employed "at will" may be terminated at any time, with or without cause and with or without prior notice. For faculty or others employed on contracts for a term, nothing in these Procedures changes the University's right to not renew any contract at any time, with or without cause. Termination or discipline of the President may be subject to the University's Articles of Incorporation, Bylaws, or the terms of the employment agreement with the President.

10. **External complaints**. If a Complainant files a complaint or makes a report under these Procedures, and the Complainant believes the response of the University is inadequate, or the Complainant believes the University has discriminated against the Complainant on the basis of race, color, national origin, sex (including sexual harassment or sexual violence), disability, age, or genetic information, or that the University has retaliated against the Complainant, the Complainant may contact or file a complaint with the U.S. Department of Education, Office of Civil Rights ("***OCR***") by calling 1(800) 421-3481 or emailing ocr@ed.gov;. For employment related matters, the Complainant may also contact the Educational Opportunities Section of the Civil Rights Division of the U.S. Justice Department.

Approved Cabinet 8/16/2022
Revisions 1/15/2025