



Hebrew Union College-Jewish Institute of Religion

2023-2024 Student Handbook

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Prospective students are encouraged to review this catalog prior to signing an enrollment agreement. You are also encouraged to review the School Performance Fact Sheet, which will be provided to you prior to signing an enrollment agreement. All content in the catalog is subject to change. Please visit our website for updated information.

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Mission Statement

Hebrew Union College-Jewish Institute of Religion (HUC-JIR) is North America's premier institution of Jewish higher education and the center for professional leadership development of Reform Judaism. A multi-campus academic and spiritual learning community, HUC-JIR builds vibrant progressive Judaism in North America, Israel and around the globe by:

- Studying the great issues of Jewish life, history and thought with an open, egalitarian, inclusive, and pluralistic spirit;
- Educating innovative, visionary clergy and professionals who embody the sustaining values, responsibilities, practices, and texts of Jewish tradition to inspire future generations; and
- Advancing the critical study of Judaism and Jewish culture in accordance with the highest standards of modern academic scholarship.

Introduction

The *Student Handbook* addresses the non-academic policies that pertain to students (degree and non-degree seeking), faculty (full-time and adjunct), staff and administration, as well as fieldwork supervisors in all academic programs across HUC-JIR.

The most recent edition of the Handbook may be obtained from the Office of Student Support, on the HUC-JIR website: <https://huc.edu/for-students/>:

Office of Student Support
HUC-JIR
One West Fourth Street
New York, NY 10012-1186

Questions about the policies in this document may be addressed to the Office of Student Support, Office of the Registrar, or an academic program director.

General questions about HUC-JIR, concerns about a student, or claims of a violation of a policy in this document may be addressed to the Student Support Help Desk at (844) 317-HELP or SSHD@huc.edu.

Official College-Institute Communication and Email Accounts

HUC-JIR issues each student a College-Institute email address such as jsmith@HUC.EDU. HUC-JIR will use the student's postal address or the HUC email address for official communications. It is the student's responsibility to monitor the HUC email account on a regular basis.

New students become eligible for a HUC-JIR student user account upon enrollment to HUC-JIR.

Student accounts remain active while the student remains registered for courses with HUC-JIR or is on approved leave of absence through the Registrar's Office.

In the case of students who have not attended classes in some time (e.g. they have not graduated; are not registered for courses; have not officially withdrawn; have not gone on approved leave of absence), their accounts will be deactivated and deleted one year after they last attended classes at HUC-JIR.

Academic Grievance Procedure

1. Should students have grievances against a faculty member relating to any academic matter, they should avail themselves of the procedure outlined below. The goal of the academic grievance procedure is to effect reconciliation between the instructor and the student.
2. Any student has the right to question a course grade he or she has received, but the student should recognize the difference between questioning a grade and charging an instructor with a violation of the good teaching practices. Such a charge is a serious act and should neither be undertaken lightly nor should the desire to have a grade reviewed and changed be the primary motivation.
3. If the student wants to contest a grade, the student should first meet with the instructor to voice a complaint and to receive an explanation and possible redress. If the student is not satisfied with the explanation, he or she may confer with the faculty member's Academic Program Director and ask for a review of the grade. The Academic Program Director will consult with the faculty member and review the material. If the decision of the Academic Program Director is not acceptable to the student, they may appeal to the Dean whose decision shall be final.
4. A student who feels that a faculty member has violated good teaching practices shall first discuss the matter directly with the faculty member, accompanied by their faculty advisor, if applicable. If the student feels that their grievance has not been properly adjudicated, the student should request a conference with the Academic Program Director. If the intervention of the Academic Program Director still has not achieved reconciliation, the student may submit to the Dean a letter formally stating the nature of the grievance with specific reference to teaching responsibilities that have not been fulfilled. The student should also provide any materials supportive of the complaint.
5. Within ten (10) days after receiving this written complaint from the student, the Dean will request the chairperson of the Faculty to convene a Faculty Grievance Committee that shall be made up of four full- time faculty members and a student representative selected by the student association. The Committee shall consider and investigate the complaint and make its recommendations to the Dean within thirty (30) days after receiving the complaint.
6. A Faculty Grievance Committee will not review a complaint unless it is lodged within 10 weeks of the alleged violation. For students attending ZSJNM, DeLeT, or summer session, the tenth week of the fall semester is the deadline. It shall be the responsibility of the Faculty Grievance Committee to determine, prior to considering any case, whether frank and full discussions among the student, instructor, Academic Program Director, and Dean have been exhausted as a means of resolving the grievance. If not, the case shall be referred back to the Dean as appropriate.
7. If the Faculty Grievance Committee decides to consider the case, the chairperson shall inform the student that the burden of proof rests with the student and that he or she may attend the hearing, excluding executive sessions. The chair shall also inform the instructor, when the committee decides to consider a case, that a grievance has been received by the Committee and provide the instructor with a full bill of particulars regarding the grievance and its supporting evidence. The chair shall request from the instructor in writing information germane to the case, inform the instructor that he or she may attend the hearings, excluding executive sessions.
8. If the Committee finds that no violation of the good teaching practices has occurred or that a violation has occurred but recommends that no redress is warranted, these findings will be reported by the Committee chairperson, in writing, to the student and the instructor, with copies sent to the Academic Program Director and Dean.
9. If the Committee finds that a violation has occurred and recommends any form of redress for the student, these recommendations should be reported by the chairperson of the Committee, in writing, to the Academic Program and Dean, with a copy sent to the student and to the instructor. A copy of this letter will be added to the faculty member's file. The instructor will be expected to inform the Academic Program Director of his or her compliance or noncompliance with the recommendations within ten days after the letter of notification has been sent to the instructor. Failure to respond within ten days will be taken to indicate noncompliance.
10. If the instructor complies with the recommendations, the student will be informed, in writing, by the Academic Program Director, with copies to the committee chair. If the instructor indicates noncompliance with the recommendations, copies of the recommendations and of the instructor's reply will be sent to the student, Provost, and President, and will be placed in the instructor's file. In addition, a notation of this finding may be made in the student's permanent record file.

11. If the instructor does not accept the recommendations, they may appeal the decision of the Faculty Grievance Committee to the Provost. Written notice of the desire for a review by the Provost should be made within ten (10) days of receiving the copy of the Committee's findings. If an appeal is made, a copy of the written report of the Committee and all pertinent information and material will be forwarded to the Provost. The Provost will meet with the student and instructor and review the case. The Provost then will affirm, reject, or modify the recommendations of the Committee.
12. If the instructor does not accept the recommendations of the Provost, then they may appeal directly to the President. The President shall review all materials and meet with the student and instructor. The President's decision will be final.
13. If the student has not resolved the concern/complaint to their satisfaction after exhausting the aforementioned process, they can utilize the appropriate state's complaint process.

Academic Tenure

1. The initial purpose of the student tenure review is to assist the student in succeeding at the College- Institute. If a student receives two or more “LPs” or “C’s” and/or fails one or more courses in a semester, the Program Director shall meet with the student to provide counseling and guidance. The Program Director may place the student on probation and may convene a Student Tenure Committee.
2. If a student fails three (3) courses over two academic years, the student will automatically be dropped from the academic roll. They have the right to appeal to the Student Tenure Committee for reinstatement, citing any extenuating circumstances.
3. Probationary status presumes that a student so designated has not demonstrated an ability to continue the course of study and must demonstrate this ability within one academic year in order to remain in the program. If a student receives an “F” during a period of probation, they will need to appear before a Student Tenure Committee. The student may also lose their eligibility for financial assistance.

Procedures for Academic Tenure

1. The Program Director is responsible for implementing the rules governing student tenure.
2. When necessary, the Program Director will notify the student in writing that either they must meet with the Student Tenure Committee or that they are being dropped from the academic roll but has the right to appeal to the Student Tenure Committee for reinstatement. The student will be given a copy of that section of this handbook that prescribes the procedures in these cases.
3. The composition of the Student Tenure Committee is to be determined by the Program Director, but must include at least one student from the appropriate professional school (unless the student waives this provision) and between two and four additional faculty members. The Dean may not serve on the Student Tenure Committee since they are part of the Appeals process. If the program director chooses not to chair the committee, they may designate a member of the Committee to serve as chair.
4. At least fifteen working days prior to the meeting of the Student Tenure Committee, the Program Director will give the student written notice of the time and place of the meeting, and also inform the student that s/he will have an opportunity to present pertinent information to the Committee and that the student may be present throughout the meeting until such time as the Student Tenure Committee enters into executive session. The fifteen working days notification period may be shortened with the agreement of the student and program director.
5. The Student Tenure Committee will determine the suggested course of action by secret ballot and by a 2/3-majority vote.
6. The Program Director will communicate the decision of the Student Tenure Committee in writing to the student and the Dean within five working days.
7. As part of the evaluation process, the Committee can suggest a range of ways to proceed that may include, but are not limited to:
 - a. Dismiss the case
 - b. Investigate the matter further
 - c. Oversight and assistance without putting the student on probation
 - d. Place the student on Academic Probation. The conditions of probation will be determined by the nature of the case and the findings of the Committee. The appropriate course of action that the student must follow is determined by the nature of the case. The Committee may decide that the student can continue in their program while satisfying the probationary conditions, that the student may continue with a reduced course load, or that the student may not continue in their program until all conditions of probation have been satisfied. The Committee shall determine the

timeframe for probation.

- e. Place the student on Academic Suspension for a specific period of time.
 - f. Permanently dismiss the student from the academic program, the local campus, and/or the College-Institute.
8. Within ten working days, the student may appeal the decision of the Student Tenure Committee to the Dean; the Dean's decision to the Provost; and finally, the Provost's decision to the President.
9. Copies of the communications with the student, and a confidential record of the meeting(s) of the Student Tenure Committee (other than the deliberations of the executive session, for which no written record will be made) shall be kept in the Dean's office. The student may request copies of the confidential records; such request must be in writing to the Dean.

Statement Concerning Field-Based Educational Experiences

Hebrew Union College - Jewish Institute of Religion (HUC-JIR) is highly committed to Field-Based Education Programs as an integral part of the educational process. This commitment is expressed through the institution's approach to field-based educational experiences, which are designed to be both academically rigorous and practically effective. HUC-JIR Field-Based Education Programs – which include student pulpits, internships, and related placements – aim to foster learning communities that model and teach students ways of thinking, being and doing that are integral in developing their professional identity. These experiences integrate such things as knowledge, skill, moral integrity, religious tradition, and commitment in actual practice, which is the very essence of religious and communal leadership formation.

In partnership with participating synagogues and community-based organizations, field-based educational experiences provide learning laboratories to practice the art and craft of (religious) leadership, including but not limited to the following:

- Critical reflection on practice and theology;
- Exploration of differing models for ministering to congregants and others;
- Examination of the issues of faith and social issues; and
- Development of professional identity and skills.

The Learning Agreement

A critical component to HUC-JIR's Field-Based Education programs is the Learning Agreement. A Learning Agreement is the institution's official document which outlines the expectations and responsibilities of each party for the semester-long or year-long Field-Based Education placement, student pulpit or internship.

In general, students should be exposed to as much of the day-to-day functioning of the organization as possible. For students working in synagogues, this will often include experience with worship, teaching, youth engagement, committee meetings, social gatherings, and both the pastoral and administrative responsibilities associated with congregational settings.

For HUC-JIR students working in community-based organizations or similar Field-Based Education placement sites, this will often include meeting with clients, participating in the development and/or execution of programs, becoming familiar with administrative aspects of operating the organization, participating in staff meetings and lay committee meetings, and possible exposure to the role that fundraising plays in maintaining vital programming.

Pre-Field Based Educational Experience Workshop

In addition to the Learning Agreement, HUC-JIR encourages its Program Directors / Fieldwork Supervisors – prior to the start of the Field-Based Education placement, student pulpit or internship – to conduct workshops on ethical and other issues that HUC-JIR students might encounter in field placements. These workshops shall be a prerequisite to students' participation in field placements. They shall be designed both to introduce and address many of the specific issues faced in congregational or organizational settings.

Orientation of HUC-JIR Students at Field-Based Educational Placements

Institutionally, HUC-JIR strongly encourages that students participating in Field-Based Education placements – including student pulpits and internships – be oriented at the field site on the day the placement begins. The objective of this orientation is to familiarize the student with the following:

- The organization's history and mission;
- The organizational structure in place at the field placement site and the particular individuals with whom the student will work;
- The needs of those being served by the congregation, community-based organization, or other field placement site; and
- The organization's expectations and policies, as well as the student's rights and responsibilities while engaged in the placement. This will include a review of protocol and procedure concerning harassment, discrimination, personal safety, emergencies, and related circumstances.

The orientation should also address the anticipated workload associated with the placement, which should be consistent with the parameters established by HUC-JIR and the congregation, community-based organization, or other field placement site.

Supervision in Field-Based Educational Placements

Field-Based Education Placement Site Supervisors (hereafter referenced as the “*Placement Site Supervisor*”) may include ordained clergy (rabbis and cantors), chaplains, counselors, pastoral care directors, teachers and educators, administrators, social workers, advocates and activists, some of whom pursue vocations in congregational settings and others in non-congregational settings such as hospitals, community-based programs, school settings (primary, secondary, and higher education), governmental agencies, nonprofit organizations and other diverse types of organizations. Whether supervising an HUC-JIR student in a congregational or non-congregational setting, the Placement Site Supervisor is critical to the success of the field-based educational placement.

All Placement Site Supervisors are expected to have:

- A thorough understanding of HUC-JIR’s mission and philosophy, as well as working knowledge of the institution’s approach to Field-Based Education and the objectives of this aspect of the students’ training;
- A desire to work collaboratively with HUC-JIR staff who oversee field-based placement and the ability to ensure open communication with both the student and HUC-JIR staff;
- The ability and willingness to engage the HUC-JIR student participating in Field-Based Education as a “colleague in training”;
- A commitment to participate in any required Orientation and/or Training developed by the College- Institute, to adhere to all of the requirements of HUC-JIR Field-Based Education Placement Programs and to conform to HUC-JIR policy relating to behavioral conduct, including policies prohibiting discrimination, harassment and similarly offensive and potentially illegal conduct.

Professional Ethics

The Hebrew Union College – Jewish Institute of Religion (HUC-JIR) expects all Placement Site Supervisors, clergy, educators, social workers and other professionals with whom our students work in Field-Based Education Placements to conduct themselves in accordance with the highest standards of professional and personal ethics. HUC-JIR students are expected to conduct themselves in a similar manner.

Adhering to such ethical standards involves a commitment to behaving in an honest way and with integrity, manifest in simple actions such as keeping one’s word and following through on commitments. For the student this is exemplified by arriving at the field placement on time and prepared to work, offering the time and energy expected in the Field-Based Education Placement, and presenting one’s best effort. The Placement Site Supervisor demonstrates comparable integrity by respecting the agreed upon parameters of the placement and by focusing her/his best efforts on the student.

Policies and Practices in the Context of Field-Based Educational Placements

Hebrew Union College - Jewish Institute of Religion considers Field-Based Education programs to be an extension of its campus-based education programming and central to the curriculum. As such, all Field-Based Education Placement Sites must adhere to the policies of the College - Institute. Prior to the start of a Field- Based Education Placement, HUC-JIR will provide the Placement Site Supervisor with a current version of the Student Academic Handbook, which contains the institution’s policies regarding appropriate student conduct. Field-Based Education Placement sites will also receive HUC-JIR policies relating to conduct expected of HUC-JIR faculty and staff.

Throughout the fieldwork period HUC-JIR students and their Placement Site Supervisors, as well as other individuals associated with the placement, are expected to maintain proper bounds of conduct as outlined in HUC-JIR institutional policy.

Any student who violates these policies while serving in a Field-Based Education Placement or internship will be subject to disciplinary action, as specified in the Student Academic Handbook. Additionally, the Field-Based Education Placement or internship site, including the Placement Site Supervisor and any individual associated with the site who is connected with the fieldwork or internship in any manner, is expected to maintain an appropriate, professional

environment free from harassment, discrimination, intimidation and related conduct.

Use of Power

In the realm of covenants, one of the most fundamental relationships is the use of power. As students advance through HUC-JIR's programs of study and participate in Field-Based Educational Placements – irrespective of whether they are student pulpits, internships or other types of placements – it is important that both the Placement Site Supervisor and the student understand and appreciate the ethics of power. Power is inherent in the role of clergy and in the role of the supervisor. As HUC-JIR students and their Placement Site Supervisors work together it is important that appropriate boundaries are both observed and acknowledged. In Field-Based Education Placements, students should also recognize the need and develop the ability to relate in a responsible manner to congregants, clients, colleagues, and others with whom they interact.

Sexual Ethics

As discussed in the “Equal Employment and Non-Discrimination Policy” and the “Sexual Misconduct and Interpersonal Violence Policy,” HUC-JIR will not tolerate sexual harassment in any organizational setting in which HUC-JIR students are placed. It is always the Placement Site Supervisor's responsibility to maintain appropriate boundaries and a professional relationship with the student. It is also important for Placement Site Supervisors and students to remember that it is not appropriate for sexual contact to occur in the context of Field-Based Educational Placements, including but not limited to sexual contact between the Placement Site Supervisor (as well as others within the organization who participate in guiding aspects of the field-based educational placement) and the HUC-JIR student, between the student and a congregant in a synagogue setting, or between a student and a client in a community-based organizational setting. Such conduct will result in the immediate termination of the Field-Based Educational Placement.

Procedures for Handling Incidents of a Sexual Nature in Field-Based Educational Placements

Any student who has been subjected to sexual harassment, or any untoward conduct of a sexual nature, should refer to the “Sexual Misconduct and Interpersonal Violence Policy” for information regarding how to proceed.

Code of Ethics

Given its mission, Hebrew Union College-Jewish Institute of Religion (the “College-Institute”) establishes the following Code of Ethics (the “Code”), its principles apply to its volunteers (including but not limited to its Boards of Governors and Overseers), employees (including but not limited to its Administrators, Faculty, Staff, Independent Contractors and vendors), and Students (collectively, “College-Institute community members”). The purpose of the Code is to set forth the ethical expectations for the College-Institute community and our partner institutions with whom we work and place students. This is a statement of principle which cannot serve effectively as a stand-alone document. Rather, its requirement that College-Institute community members act ethically is incorporated into all other College-Institute policies. Our collective and individual duties to act ethically are an inherent part of all policies.

I. Ethical Obligations

A. Complying with Legal and Professional Obligations

The College-Institute requires its members to comply with all applicable federal, state, and local laws and to conform to the highest standards of professional conduct. To the extent the College-Institute community members are governed by standards specific to a profession (such as attorneys, psychologists, professors, or certified public accountants), community members must adhere to those professional standards. For the sake of clarity, when the Code of Ethics contains higher standards than those specific to a profession, this Code of Ethics will prevail.

The College-Institute community members must conduct themselves in accordance with professional principles for scholarly work, including upholding academic codes of conduct and professional standards for research.

The College-Institute strives to recognize vulnerabilities among its community members. Any act or behavior which exploits the vulnerability of another, compromises the College-Institute’s moral integrity and is an ethical violation. It should go without saying that any crime, abuse or attempted crime or abuse committed towards children, the legally incompetent, or those otherwise unable to give consent is never ethical, never acceptable and will be subject to disciplinary action by the College-Institute as well as referral to legal authorities.

B. Academic Integrity

True learning requires an environment of honesty. That environment is undermined by such overtly dishonest acts as misrepresenting your status, work, or qualifications, misappropriating the work of others, fabricating, or manipulating data, plagiarizing, and cheating.

An honest environment may also be impeded by less overt behaviors such as denying students access to or freedom to express divergent views, denying students effective class participation, or deliberately suppressing or distorting subject matter. Members of the College-Institute community are entitled to an informed and impartial evaluation of their work and/or academic performance.

C. Operational Integrity

All financial transactions or data must comply with all applicable legal, regulatory, and professional requirements, as well as College-Institute rules and policies, whether applicable to funding grants, purchase of goods or services or expense receipt processing, as a few examples. The spectrum of financial matters, large and small, is covered.

Relatedly, College-Institute services, time, materials, supplies, equipment, and facilities are dedicated to College-Institute operations, not for any individual’s personal benefit.

The use of the information and communication systems of the College-Institute is dedicated to its operations and must reflect its ethics and values. All such systems, including computer programs, electronic mail, voice mail, electronic archives, should primarily be used for business or academic purposes and regardless of the nature of use, must comply in all respects with College-Institute policies, including those prohibiting discriminatory, degrading or obscene communications.

Users of our information and communication systems must also observe all applicable licensing and other terms and conditions of use, including copyright and other protections of intellectual property. Use professionalism and good

judgment when using any information or communication technology, including social media, blogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites and the like. These tools allow the efficient and broad communication of ideas and knowledge.

Inappropriately used, they also enable the rapid and broad dissemination of information that is false, inane, unprofessional, or harmful. Do not post impulsively or without verification of information from third parties. Recognize and take steps to maintain a demarcation between a personal and professional presence on social media. Do not present your personal views as those of the College-Institute. Do not post or comment on social media using your College-Institute title without express authorization.

While the College-Institute recognizes that incidental use of its information and communication systems may be necessary, such usage must be kept at a minimum and not interfere with work or academic efficiency.

D. Social Integrity

The College-Institute is committed to providing a work and academic environment where it not only complies with legal obligations against unlawful discrimination, harassment and sexual misconduct, but it also maintains a higher standard of treating all individuals with respect, professionalism and civility. To that end, the College- Institute emphasizes its prohibition against potentially damaging behaviors that may not rise to the level of unlawful conduct, such as bullying or sexual relationships between those of unequal power.

Academic and employment relationships should be based on trust, respect, and mutual regard. Relationships between persons of unequal power are susceptible to coercion, real or perceived. Abuse of power or the exploitation of an individual for one's personal benefit is anathema to an honest academic and/or employment environment. Those persons in a position of authority over another, persons whom they supervise, teach, coach, advise, mentor or evaluate, for example, must avoid conflicts of interest and are prohibited from engaging or attempting to engage in a romantic or sexual relationship with an individual in a role subordinate to him or her. This prohibition applies to all members of the College-Institute community, including supervisors, administrators, faculty, mentors, and students. In the event that a consensual relationship preexists a subsequently developed relationship of unequal influence or authority, the specific circumstances will be reviewed on a case-by-case basis to determine whether an exemption to this provision is warranted with the development of appropriate safeguards.

E. Avoiding Conflicts of Interest and Commitment

College-Institute community members should not have direct or indirect interests or commitments, financial or otherwise, which conflict with the proper discharge of their duties to the College-Institute. The primary professional allegiance of all College-Institute community members rests with the College-Institute and the advancement of its mission. College-Institute community members are not allowed to solicit or accept any gift, service, or favor that might reasonably influence the discharge of their duties or that they know or should know is being offered with the intent to influence any official conduct. College-Institute community members are not allowed to accept other employment or engage in business or professional activities outside of the College- Institute when such work might reasonably cause real or apparent conflicts of interest or conflicts of commitment.

College-Institute community members must disclose potential conflicts of interest to their supervisor or other relevant official as soon as possible when they realize that a conflict has or potentially may have arisen. In the event a conflict exists, the College-Institute community member must work with the College-Institute to resolve the conflict in accordance with the conflict-of-interest policy or resign from their College-Institute position.

II. Applicability of the Code

College-Institute community members represent the College-Institute whether on campus or elsewhere. The College-Institute expects community members to conduct themselves in a manner that does not injure the College-Institute's mission, community, reputation or standing. The Code extends not only to all College- Institute facilities (including Israel) but to offsite College-Institute events, and any communications made via the internet, including social media and email, or other third-party platforms with any nexus to the College-Institute.

III. Reporting Violations of the Code

A. Collective Responsibility

All College-Institute community members should report actual or suspected violations of the Code in accordance with Section IV. In cases where a person of authority is present and observes such behavior (such as an educator in a classroom, presiding officer in a board meeting, or during faculty meetings), that person has an ethical obligation to prevent that behavior from escalating and to report it.

The College-Institute has an “open door policy” where community members are encouraged to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, a supervisor is in the best position to address an area of concern of an employee, and a faculty member for a student. However, if an employee or student is not comfortable speaking with a supervisor or faculty member, or is not satisfied with their response, the employee or student is encouraged to speak with the President, Chair of the Board of Governors, or anyone in management whom they feel comfortable approaching. Supervisors and managers are required to report suspected violations of the Code to the College-Institute’s Compliance Officer. For suspected fraud, or when an employee or student is not satisfied or uncomfortable with following the College-Institute’s open-door policy, individuals should contact the Compliance Officer directly.

B. Compliance Officer

The College-Institute’s Compliance Officer is the CFO/VP of Finance and Administration, with support staff from the Department of Human Resources. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and may use appropriate staff or third parties as necessary to assist in investigatory efforts. The Compliance Officer must inform the President and Chair of the Board of Governors of any pending complaints and must provide status updates as necessary to inform the President and Chair of the Board of Governors on the findings of the investigation, the actions taken to resolve the complaint (if any), and a recommendation as to the disciplinary actions to be taken. Should the complaint involve the President, the Chair of the Board of Governors, or any other high-ranking Administrator to which the Compliance Officer feels, in their sole discretion, to be an inadequate investigator to investigate the complaint, the Compliance Officer may refer the matter to an appropriate authority within the College- Institute who can better carry out the duties and responsibilities of the Compliance Officer.

The Compliance Officer has direct access to the Board of Governors and is required to report to the Board of Governors at least once a year on compliance activity, if any.

C. Handling of Reported Violations

All reported violations will be promptly investigated, and appropriate disciplinary or corrective action will be taken if warranted by the investigation. For procedures and due process, see attached Appendix on procedures.

D. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or with knowing falsity will be treated as a serious disciplinary offense, which may result in written warning, demotion, transfer, suspension, dismissal, expulsion or termination.

E. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously directly to the Compliance Officer. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

F. No Retaliation

College-Institute community members who in good faith report a violation of the Code shall be protected from harassment, retaliation, or adverse employment consequences. Any College-Institute community member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of

employment or expulsion from the College-Institute. This policy is intended to encourage and enable College-Institute community members to create a culture of responsible collaboration, which involves raising concerns within the College-Institute for adjudication prior to seeking resolution outside the College-Institute.

IV. Conclusion

As College-Institute community members, we pledge ourselves to be scrupulous in our adherence to the foregoing Code of Ethics, and to hold others and ourselves to the highest standards.

Student Behavior and Professional Conduct

1. Students and other members of the HUC-JIR community are expected to abide by the highest moral values of our faith traditions, including personal conscience, professional conduct and integrity, and honorable social relationships. Students must be conscientious in avoiding the appearance of misconduct on campus, in congregations, schools, agencies, and in the broader community.
 - a. Because a HUC-JIR student's primary reason for serving in fieldwork settings is due to her/his affiliation with the College-Institute, this policy on student behavior and professional conduct will govern the student in those settings. However, this does not preclude action by the organization where the fieldwork is being performed or the involvement of local law enforcement and courts with appropriate jurisdiction.
 - b. Community conduct and ethical standards include:
 1. Respect for the rights, differences, and dignity of others
 2. Honesty and integrity in all dealings
 3. Conscientious pursuit of excellence in one's work
 4. Accountability for actions and conduct on the campus and in the workplace.
 - c. The College-Institute may take disciplinary action as it deems necessary should the standards of personal and ethical conduct be violated. Violation of these standards shall include, but is not limited to:
 1. Academic misconduct including, but not limited to, plagiarism or cheating
 2. Abuse of alcohol or drugs
 3. Discriminatory or harassing behavior
 4. Sexual Misconduct (including, but not limited to, sexual harassment and sexual assault)
 5. Interpersonal violence (including, but not limited to, domestic violence, dating violence, and stalking)
 6. Giving false statements to the College-Institute orally or in writing including, but not limited to, one's application for admission or registration or altering records
 7. Violation of the Technology Usage Policy
 8. Financial malfeasance
 9. Violent behavior
 10. Use of abusive or offensive language
 11. Creating a hostile or threatening environment
 12. Theft of College-Institute or personal property
 13. Violation of College-Institute academic regulations and policies
 14. Disrespect toward a College-Institute employee
 15. Students involved in a criminal violation are accountable to local authorities but may also be subject to discipline by the College-Institute.
2. Other than complaints related to discrimination, harassment, sexual misconduct, or interpersonal violence, complaints of a student's alleged inappropriate behavior are to be brought to the Program Director (or the

Dean's designee). The Program Director (or Dean's designee) will investigate the charges further, and consult with the student, appropriate faculty, student representatives and any outside consultants or other individuals deemed necessary to determine whether disciplinary action is warranted. Complaints related to sexual misconduct or interpersonal violence should be made to the Title IX Coordinator (see the Sexual Misconduct and Interpersonal Violence Policy for more information). All other complaints of discrimination and/or harassment should be made to the National Director of Human Resources who serves as the Title IX Coordinator (see the Equal Opportunity and Non-Discrimination Policy for more information).

- a. When community and ethical standards have been broken, the offender should ask forgiveness, avoid repetition, and make restitution whenever possible.
- b. The student's program director may suggest that the student seek counseling or other expert treatment.
- c. The College-Institute's National Director of Legal Affairs should also be contacted for review and consultation.
- d. A Program Director (or the Dean's designee) may issue a written reprimand to the student and may also place the student on immediate probation.
- e. In an emergency situation, the Dean (or Dean's designee) may determine that it is appropriate to immediately remove the student from the campus and related educational activities. The student's Program Director should follow up immediately by investigating the situation and determining the next appropriate steps which may include a Student Tenure Committee meeting.
- f. A student's tenure may be terminated if it is determined that they engaged in inappropriate behavior that renders him/her unsuitable for their chosen profession, including but not limited to behavior that is unethical, illegal, or otherwise inconsistent with the codified standards of the individual professional organization of the field for which the student is preparing himself/herself.
- g. Additionally, the Program Director (or Dean's designee) may determine that a Student Tenure Committee should be convened in order to consider the situation and, if necessary, the Committee may determine the appropriate disciplinary course of action.
- h. The Student Tenure Committee will be governed by the procedures and timelines outlined elsewhere in this Handbook.
- i. The disciplinary actions that may be taken by the Student Tenure Committee include:
 1. Reprimand and disciplinary probation
 2. Temporary suspension with time and terms of re-admission indicated
 3. Indefinite suspension with time and terms of re-admission not indicated. Return to the College-Institute would be determined by the student's Program Director
 4. Removal of financial assistance
 5. Permanent dismissal
- j. The student may appeal the decision of the Student Tenure Committee using the same process described elsewhere in this Handbook.

Procedures for Non-Academic Tenure

Allegations related to sexual misconduct or interpersonal violence will be governed by the policies and procedures seen in the Sexual Misconduct and Interpersonal Violence Policy. Allegations related to any other form of discrimination and/or harassment will be governed by the policies and procedures seen in the Equal Opportunity and Non-Discrimination Policy. All other allegations of a student's alleged inappropriate behavior are governed by the procedures set forth in this section of the handbook.

1. Allegations of a student's alleged inappropriate behavior are to be brought to the Program Director. The Program Director will investigate allegations further and consult with the appropriate faculty and student representatives in order to determine whether or not the matter is to be brought to the attention of a Student Tenure Committee. The Program Director may consult with outside experts and professionals. If it is determined that the matter should be brought before a Student Tenure Committee, then the student will be notified in writing of the charges that have been made and the findings that pertain to those allegations and will be given a copy of that section of this handbook that prescribes the procedures to be followed by the Student Tenure Committee.
2. The composition of the Student Tenure Committee is to be determined by the Program Director but must include at least two faculty members and one student from the appropriate academic program. The Committee shall be chaired by the Program Director, or the Program Director may designate a chair from among the Committee members.
3. At least fifteen working days prior to the meeting of the Student Tenure Committee, the Program Director will give the student written notice of the time and place of the meeting, and written notification that the student may be present throughout the meeting until such time as the Student Tenure Committee enters into executive session. The fifteen working days notification period may be shortened with the agreement of the student and program director.
4. At the meeting of the Student Tenure Committee, the Program Director will present information pertaining to the charge(s) of inappropriate behavior. The student may present pertinent information to the Committee or may ask others to present information on their behalf. When all of the information has been presented, the Program Director, the members of the Committee and the student may raise any questions they may have. When all questions have been raised, the members of the Student Tenure Committee will enter into executive session.
5. The Student Tenure Committee will deliberate in executive session and will determine its decision by secret ballot and by 2/3-majority vote. The Committee may consider the following options (or other options that the Committee may deem appropriate):
 - a. Dismissal of the charge(s.)
 - b. Suspension: The Committee will stipulate an appropriate course of action for the student. The student may not continue in their program until they demonstrate to the Committee that they have met all of the Committee's stipulations.
 - c. Dismissal of the student from the program.
6. Within five working days, the chair of the Committee will communicate the decision of the Student Tenure Committee in writing to the student and the Dean.
7. Within ten working days, the student may appeal the decision of the Student Tenure Committee to the Dean; the Dean's decision to the Provost; and finally, the Provost's decision to the President.
8. Copies of the communication with the student, and a confidential record of the meeting(s) of the Student Tenure Committee (other than the deliberations of the executive session, for which no written record will be made) shall be kept in the Dean's office. The student may request copies of the confidential records; such request must be in writing to the Dean.

Academic Integrity

1. HUC-JIR students are expected to maintain the highest standards of integrity with respect to their academic work. The College-Institute considers all breaches of personal and academic integrity to be serious offenses.
2. Cheating involves, but is not necessarily limited to, the use of unauthorized sources of information during an examination.
3. Plagiarism, the appropriation of unattributed ideas or verbatim copying, is entirely at odds with the core principles of Jewish tradition and academic rigor. Students are expected to be familiar with the proper rules of citation (see the [MLA Handbook](#), or similar works). Students must ensure that they understand their instructors' expectations and avoid utilizing completed work, notes, drafts, or homework of other students when it is inappropriate.
4. Work completed for one course may not serve to fulfill obligations of another course, unless explicitly permitted in writing by the two professors involved. When in doubt, ask the professors involved about the appropriate actions to take.
5. It is a violation of the standards of academic conduct to alter any academic or official institutional record used in the admission or academic records process.
6. Disciplinary action regarding cases of cheating, plagiarism or other violations of academic integrity may be taken by faculty members, the administration, or the Student Tenure Committee where necessary.

Copyright Law and Peer-to-Peer File Sharing

What is Peer-to-Peer?

Peer-to-Peer ("P2P") file sharing is a way of exchanging or transferring files over the Internet. Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the United States Code).

These rights include the right to reproduce or distribute copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement. Below is a partial list of various P2P programs that allow users to exchange and share files, this list is not exhaustive:

- | | | |
|------------|---------------|------------|
| • Ares | • Bit Tornado | • KaZaA |
| • Azuereus | • BitTorrent | • Limewire |
| • BitComet | • FlashGet | • Morpheus |
| • BitLord | • Gnutella | • uTorrent |

What is wrong with Peer-to-Peer file sharing?

Copyrights help to ensure that authors of creative works can control how those works are used and prevent others from capitalizing on, or using or distributing, the works without permission. While P2P file sharing programs may be used for legitimate reasons, these programs are overwhelmingly used for the illegal distribution of copyrighted works such as music, movies, software, books, images, and TV programs without permission from the copyright owner. Sharing any file of a work that you did not create yourself as an original work, is not in the public domain, or for which you do not have permission to share can have serious consequences.

Not only are there substantial legal risks, using P2P programs degrades the speed of the College-Institute's network, may contain spy-ware, viruses, or exploits that may allow unauthorized access to the machine as well as the network hosting the program. The laws that govern copyright are not specific to any one technology; you can violate the rights of a copyright holder using many different types of technology. Both uploading and downloading of copyrighted files can violate copyright law.

What is the College-Institute's policy on Peer- to-Peer file sharing?

Most, if not all, of the P2P programs listed above threaten or disrupt the integrity of the College-Institute's computing services and its network. The College-Institute respects the intellectual property of others, regardless of the medium in which the material is transmitted as this is a cornerstone of academic integrity. Access to the College-Institute's technology is a privilege granted to students, faculty, staff, and approved guests. Everyone using these resources is responsible for using them in an effective, ethical, and lawful manner. We prohibit the use of unauthorized distribution of copyrighted material.

What is the College-Institute doing to combat Peer-to-Peer File Sharing?

The College-Institute currently employs bandwidth-shaping technology to prioritize network traffic. We also block known Peer-to-Peer software.

What will happen if I am caught using these programs?

If you use the HUC-JIR wireless network to download or use file sharing software like Bit Torrent, or LimeWire, etc. and use that program to share copyright material or violate College-Institute policies, the College-Institute may terminate your campus computer connection.

Continued use of file sharing software or services will require the College-Institute to impose additional sanctions. Sanctions may include, but are not limited to, revocation of access rights and/or other sanctions up to and including suspension or expulsion for students, and termination for employees.

In addition to HUC-JIR sanctions, there are civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or "statutory" damages affixed at not less than \$750 and not

more than \$30,000 per work infringed. For "willful" infringement, a court may award up to \$150,000 per work infringed. A court can, in its discretion, also assess costs and attorneys' fees. Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000 per offense.

For more information, please see the web site of the U.S. Copyright Office at www.copyright.gov, especially their FAQ's at www.copyright.gov/help/faq.

If you have questions about this policy, please contact the College-Institute's Chief Technology Officer at CTO@huc.edu

Social Media Policy

It is Hebrew Union College's ("HUC" or the "College") policy to recognize the value that social media can have and to encourage users to embrace social media responsibly as an engaging and impactful communications tool. HUC acknowledges that social media may be used to further the College's mission and strategic goals by providing interaction between students, alumni, employees, Board members, supporters, prospective students and supporters, and the larger community, among others.

Purpose of Policy

The purpose of these policy guidelines is to have a set of standards for social media that can be applied across all areas of the College. This policy is designed to:

1. Advise on appropriate content for HUC's official social media accounts;
2. Help HUC employees make appropriate decisions when developing and/or managing social media accounts or initiatives on behalf of the College; and
3. Guide College social media users who indicate an HUC affiliation on their personal social media profiles, on how to balance their affiliation with personal conversation.

Applicability

This policy applies to the employees of HUC. This policy refers to social media only. For guidance about email, verbal, or other standard communications not defined as social media, please refer to the **Code of Ethics Policy** in the Employee Handbook, Faculty Handbook, and Student Handbook.

Definitions

Social media - refers to websites and applications that enable users to create and share written, audio, image, and/or video content and virtually connect with other users. Examples of social media include Facebook, Twitter, Instagram, LinkedIn, Vimeo, YouTube, Clubhouse, personal blogs, and other similar websites and applications.

User - refers to employees of HUC who engage with social media channels.

Procedures and Implementation

Official Social Media Channels: Management and Content Sharing

This section of the Social Media Policy provides information about the College's use of social media.

Accounts: The College's official social media channels include:

- facebook.com/hucjir,
- twitter.com/hucjir,
- instagram.com/hucjir,
- linkedin.com/school/hebrew-union-college, and
- vimeo.com/hucjir.

These channels may expand or change. Contact the National Office of Communications and Public Affairs at news@huc.edu for the most updated list.

Management: The National Office of Communications and Public Affairs maintains the strategic direction and development of HUC's official social media accounts and utilizes best practices in social media to promote the College's mission and strategic goals.

Content Sharing: Social media is most effective when it is rooted in collaboration. The National Office of Communications and Public Affairs invites faculty, students, staff, Board members, and alumni to share their news with us at news@huc.edu. By submitting their content to the National Office of Communications and Public Affairs, they

authorize the College to share it for marketing purposes, including but not limited to, posting on the College's social media accounts, in the format and manner determined by the College in its sole discretion.

Approved content may include, but is not limited to, the following:

- Information from or about HUC students, faculty, administration, Board members, or alumni and their unique experiences, studies, work, research, accomplishments, etc.;
- Information from or about HUC schools, programs, campuses, departments, research centers, libraries, museums, archives, projects, etc.;
- Information about applying to HUC, supporting HUC, or other calls to action in support of our mission and strategic plan;
- Statements from the National Office of Communications and Public Affairs, President's Office, Board of Governors, Chief Financial Officer (CFO), or Provost;
- HUC-sponsored events or events at which our students, faculty, administration, Board members, or alumni are speaking or actively taking part;
- HUC's celebration of Jewish, Israeli, and American holidays; and
- Other material as determined by the National Office of Communications and Public Affairs.

Prohibited content on HUC official channels typically includes, but is not limited to, the following:

- Information that goes against the mission or strategic plan of the College;
- Confidential or proprietary information about HUC or our students, alumni, Board members, faculty, or staff;
- Job announcements from our alumni, with the exception of a standardized announcement of placement of the graduation/ordination class at the end of the academic year;
- Information that is not related to HUC;
- Politically driven endorsements or oppositions of any person or campaign;
- Discriminatory, harassing, threatening, or obscene language;
- Posts in breach of the Terms of Service of the host website; and
- Other material as determined by the National Office of Communications and Public Affairs.

If uncertain about the appropriateness of content for HUC's official social media channels, please contact the National Office of Communications and Public Affairs at news@huc.edu. HUC reserves the right to remove content at any time for any reason.

Production Schedule: The College's social media calendar is planned in advance to allow for 1) the proper preparation of content, and 2) intentional placement of content across platforms at strategic times for optimal engagement. To assist the National Office of Communications and Public Affairs with honoring promotion requests to the extent practicable, information should be shared with advanced notice, even if all information required for the post is not yet available, to news@huc.edu.

Please note the following deadlines for requests (reflected in business days). *Advanced notice beyond these requirements is always appreciated and encouraged. The College will strive to follow the timeline below, but no request can be guaranteed.*

- **Graphics:** If a new graphic is needed, the request must be made at least one week in advance.
- **Videos:** If an edited video needs to be uploaded, please provide material in highest resolution at least two days in advance. If minimal editing is needed (such as trimming a video or adding a cover slide), please provide material in highest resolution at least four days in advance. If advanced editing is needed, please contact us to determine an appropriate production schedule.
- **HUC Press Releases:** If a press release needs to be written, please contact us at least one week in advance. Include all relevant material, including links, images, and whom to contact for additional information.
- **Press / Media:** Please allow one day to post an appropriate news article. If unexpected (such as a death notice), please be in touch immediately and we will try to post the same day.
- **Events:** The Marketing Team aims to share events with HUC-JIR followers a minimum of three days in advance and therefore requests five days' notice.

Departmental Use of Social Media on Behalf of HUC

This section of the Social Media Policy provides guidelines for a College user's authorized use of social media for business purposes.

Authorization Required: Only certain individuals authorized by the National Office of Communications and Public Affairs may post to social media on the College's behalf. All other users should follow the guidelines below for personal use of social media.

Creating New Social Media Accounts: The creation or development of public social media accounts or other marketing or communications initiatives bearing HUC's name or logo, or the name or logo of a School, Program, or Department of the College, require prior approval from the National Office of Communications and Public Affairs.

Use of Logo and Branding: Upon approval from the National Office of Communications and Public Affairs to create a public departmental social media account, the National Office of Communications and Public Affairs will provide HUC's logo, branding, colors, and fonts. No user is permitted to use HUC's logo or branding without the prior approval of the National Office of Communications and Public Affairs.

Maintain Confidentiality and Privacy: Do not post confidential or proprietary information about HUC, our students, faculty, alumni, Board members, or fellow employees. All employees and agents of HUC are subject to FERPA, HIPAA, and other laws governing the privacy of personal information. If you are unsure if information is confidential, proprietary, or private, consult the person whose information is involved or the National Office of Communications and Public Affairs, as appropriate.

Use Good Judgment: Be thoughtful and discerning when engaging on social media. Remember that as an employee of HUC, you are representing HUC in the public eye. All of your posts, comments, and engagements on social media are a reflection on the College and have the ability to affect the College's reputation. Please bear in mind that posts can reach anyone, may be misinterpreted or may show up outside of their original context, and can be readily reproduced and disseminated, even after the post is taken down. When authorized to engage on social media *on the College's behalf*, do not express political opinions or engage in political activities. If you are uncertain about a post, comment, or engagement, please contact the National Office of Communications and Public Affairs.

Be Accurate and Transparent: Make sure that you have all the facts before you post. It is better to verify information with a source first and post with less immediacy than to have to post a correction or retraction later. If you make a mistake, admit and correct it. Do not provide false or misleading information about your identity or affiliation.

Assigning Responsibility: We encourage all departments to share information with the National Office of Communications and Public Affairs, which will post on their behalf. If any additional HUC-branded public channels are maintained, ensure that they are staffed appropriately with effective training and oversight, have an identified employee responsible for social media content creation and monitoring, and keep the National Office of Communications and Public Affairs apprised of the responsible party. While student interns can be tremendous collaborators on social media initiatives, they should not be the "owners" of official HUC-branded social media accounts.

Minimize Security Risks: A compromised account can adversely affect HUC's reputation. Use strong, randomized passwords and limit those with direct access to HUC social profiles. The National Office of Communications and Public Affairs must have access to all departmental social media accounts. Report any data or security breach to the National Office of Communications and Public Affairs immediately.

Dormant Social Media Accounts: If a social media account that bears the College's name or logo has been created, but that account is not used in regular and/or direct support of HUC's strategic priorities, it is required that the account be removed from the relevant social network and reported to the National Office of Communications and Public Affairs if not successfully removed.

Crisis Communications: In the event of a crisis, or if an impending crisis is suspected, social media administrators are advised to contact the National Office of Communications and Public Affairs and wait to receive instructions. All social media communications regarding a crisis will be posted by the National Office of Communications and Public Affairs.

Be a Good Steward: The College's Social media activity should be professional, useful, and comply with all College standards, policies, and processes.

Users' Personal Use of Social Media

This section of the Social Media Policy provides guidelines for a College user's personal use of social media. When a College user is personally engaging on social media, their public HUC affiliation has the ability to affect the College as a

whole.

Use a Disclaimer: It is recommended that this disclaimer be included in personal profiles: “**The views expressed on [website, blog] are my own**”. This is not necessary for each individual post published by a user.

Personal Responsibility: Users are responsible for what they post on personal social media accounts, including content they post on their own pages, content they post on other pages, and their engagement (likes, comments, retweets, shares, et al.) with content on other pages. HUC will not be liable for and will not indemnify a user for any liability that results from postings from personal social media accounts. Social media conduct that violates any applicable policy, practice, or standard of conduct will result in appropriate discipline, consequence, or other remedial action. Please refer to the Code of Ethics and the Employee Handbook, Faculty Handbook, and Student Handbook for more information.

Maintain Confidentiality and Privacy: Do not post information about others unless you have their permission, or it is public information. Do not post confidential or proprietary information about HUC, our students, faculty, Board members, alumni, or fellow employees. All employees of HUC are subject to FERPA, HIPAA, and other laws mandating the nondisclosure of personal information.

Use of Logo and Branding: No user is permitted to use HUC’s logo or branding on personal social media without the prior approval of the National Office of Communications and Public Affairs. Respect the intellectual property rights of others. Do not post anything that appears to be an official statement or stance of the College unless it is official and has been published on an official HUC social media channel.

Be Reasonable, Lawful, and Compliant: Use good judgment. Be ethical, truthful, respectful, and accurate. Be civil to others and their opinions. Do not engage in any conduct that would not be acceptable in HUC’s community. This includes, but is not limited to, refraining from engaging in any discriminatory, harassing, threatening, intimidating or defamatory communications, or any other activity prohibited by any applicable law or HUC policy.

Enforcement

All users are responsible for their activities when engaging in social media. This policy will be enforced consistent with all applicable laws and policies.

The National Office of Communications and Public Affairs reserves the right to remove content from the HUC-managed sites and the HUC Department-managed sites that do not comply with this policy. Users may be instructed to remove or otherwise take action in response to noncompliant social media activity. Failure to follow this policy may result in disciplinary action, up to and including termination, for employees, corrective action for students, and other consequences.

Postings that violate this policy will be investigated, regardless of whether the posting is made anonymously or under a pseudonym. Violations of this policy should be reported to the user’s immediate manager, the National Office of Communications and Public Affairs, or to Human Resources.

Policy Owner, Management, and Point of Contact Information

If you need assistance on a matter related to social media, please contact HUC’s National Office of Communications and Public Affairs at news@huc.edu or call 212-824-2209.

The National Office can help you create a departmental social media strategy and/or initiative. [Academic Freedom]

The College-Institute reserves the right to change this policy at any time. This policy is posted in the Employee Handbook, the Faculty Handbook, and the Student Handbook. and on the website.

Transcript Notations (NY Campus Only)

As per New York Education Law, Article 129-B, the College-Institute will include notations on the transcripts of students found responsible through the institution's conduct process for conduct which also constitutes those crimes set forth in 20 U.S.C. 1092(f)(1)(F)(i)(I)-(VIII) of the Clery Act. Such transcript notations will state "suspended after the finding of responsibility for a code of conduct violation" or "expelled after a finding of responsibility for a code of conduct violation," as applicable. Should the student withdraw from the College- Institute while the investigation of the complaint is pending, his or her transcript must note "withdrew with conduct charges pending." Should a student wish to appeal such a transcript notation, they may do so by writing to the Provost within ten (10) days of the outcome of a hearing. The Provost's decision may be appealed to the College-Institute's President within ten (10) days of the Provost's decision.

Drug Free School/Workplace Policy

The College-Institute is committed to maintaining a drug-free environment in accordance with the requirements of the federal Drug-Free Workplace Act and the amended Drug-Free Schools and Communities legislation. The unlawful manufacture, possession, use or distribution of illicit drugs and unauthorized alcohol by all students and employees on College-Institute property or at any College-Institute-sponsored activity, function, or event are strictly prohibited irrespective of whether such activities occur before, during, or after the College-Institute's regular business hours. This standard also applies to College-Institute-sponsored social activities and professional meetings attended by employees or students. The College-Institute, however, does recognize that the conditions of alcohol and drug dependency may be considered disabilities under state or federal law. It is the policy of the College-Institute not to discriminate on the basis of such recognized disabilities.

Credit Card Policy (New York Campus)

In compliance with the legal requirements of New York State Education Law §6437, Hebrew Union College- Jewish Institute of Religion (HUC-JIR) prohibits the marketing of credit cards to students. HUC-JIR does not offer an official credit card to its students, and all external efforts to market and promote credit cards on campus to HUC-JIR students are prohibited by the Director of Operations in consultation with the campus Dean. Additionally, the Director of Financial Aid, a certified personal financial manager, provides a "Money Management Program" to students once a year.

Immunization

For those students participating in the Year-in-Israel Program, all health documents (reports of immunizations, medical conditions, vaccinations, etc.) must be submitted to the HUC-JIR Office of Admission prior to registering for classes in Jerusalem.

For students enrolled in New York City, please be aware that the New York State Public Health law 2165 requires that all on-campus students be immunized against measles, mumps, and rubella. Persons born prior to January 1, 1957, are exempt from this requirement. According to this New York State Law, students will not be permitted to register or attend any classes without showing proof that they have either been vaccinated or are exempt. In addition, all students enrolled for at least six semester hours or the equivalent per semester are required to complete and return a Meningococcal Meningitis Vaccination Response Form which will be collected during the admission process.

In the event of an outbreak of measles, mumps, or rubella, the New York State Public Health Commissioner may order the appropriate officials of the College-Institute to exclude from attendance all students without documentation of immunity as specified in section 66-2.2 (b.) or (c.) and those who have been excused from immunization under section 66-2.2 (d.) or (e.) The exclusion shall continue until the Commissioner determines that the danger of transmission has passed or until the documentation specified in section 66-2.2 (b.) or (c.) has been submitted.

Political Campaigning

As an institution of higher learning, HUC-JIR is committed to academic freedom, supports free expression of political views by members of its community, and promotes open dialogue about important issues in society. The College-Institute encourages its students, faculty, and staff to exercise their rights of citizenship, including participation in the political life of their communities, the state and the nation, and to educate and involve themselves in world affairs.

As a non-profit organization, the College-Institute must nonetheless abide by federal tax law prohibitions with the provisions governing its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code and ensure that activities engaged in by HUC-JIR and members of the College-Institute community, do not call into question the college's non-partisan, educational status. Federal statute stipulates that non-profit, tax-exempt institutions of higher education are prohibited from participating in, or intervening in, any political campaign on behalf of any candidate for public office.

This policy therefore contains guidelines governing the use of HUC-JIR affiliation and resources for political activities, the use of its facilities, services, and personnel to promote, finance or support individuals, groups or organizations campaigning for public office. Nothing in this Policy is intended to limit the rights of students, faculty, or staff to express personal opinions or to engage in political activity in their individual capacities and as private citizens.

1. The following guidelines and restrictions apply to campus involvement in political campaigns.
 - Every member of the HUC-JIR community has a right to participate or not, as he or she sees fit, in the electoral process. As an individual you are free to endorse, support, or oppose candidates. However, students, faculty and staff of the College should be careful to qualify that the opinions expressed are their own and do not represent the official position of HUC-JIR.
 - No member of the College-Institute community should speak for or act in the name of the College in a political campaign or other partisan electoral activity.
 - Use of the college's name, letterhead, or logo for partisan electoral purposes such as the solicitation of funds or other contributions in support of a political party or candidate or the endorsement of candidates for public office is prohibited.
 - No member of the College-Institute community should make statements that favor or oppose candidates or political parties at any College-Institute event or in any College-Institute official publication (including the website or social media platform), with the exception of an authorized student-run publication. Any student-run publications that feature editorials must state that the views reflected are those of the student editors and not the College-Institute.
 - Social media sites (e.g. Facebook, Twitter, Instagram, YouTube, etc.) that are created and/or maintained by, or for, the College-Institute or affiliated groups, must avoid anything that might be considered as political campaigning. Social media accounts that are strictly personal – in your personal name and maintained by you from your home computer or personal laptop – may be used to express your personal political belief and may be used to engage in political campaigning.
 - Voter education drives conducted in a biased manner that favor or oppose candidates or specific political parties are not permissible.
 - Making telephone calls to the public advocating for a candidate or political party – in the name of the College-Institute – is not permissible.
 - College-Institute-paid political advertisements (newspapers, radio, television, websites, mailings) are not permissible.
2. Every effort should be made to ensure that appearances of candidates for public office or their political representatives at college sponsored events have a substantive purpose and appear in their non-candidate capacity, and that such visits not be conducted solely as campaign rallies or events.
 - Candidates for office, including elected officials seeking reelection, who approach HUC-JIR administration seeking opportunities to appear on campus and address the College-Institute community should accordingly be referred to the appropriate HUCJIR administrator (Dean/Department Head).
 - If a faculty member, administrative and/or academic department, or the college itself chooses to invite an

individual candidate to speak, every attempt should be made to provide opposing candidates the same opportunity. Members of the HUC-JIR community may not use college-institute facilities, services, and college-sponsored events for campaign or party fund-raising activities.

- HUC-JIR facilities, services, and college-sponsored events may not be used by outside organizations or outside individuals whose purpose is to further the cause of a candidate or political party.
- The College-Institute's IT resources may not be used to support or oppose a candidate's campaign. Individuals cannot use official College-Institute hosted websites to express their views on a candidate unless that expression meets the "educational activities" test as defined as permissible under Section 501(c)(3) of the Internal Revenue Code. Employees and students are allowed to link a College-Institute's website to official candidate websites provided that links to all qualified candidates are equally accessible and the links are provided as a means of voter education and not advocacy.

3. The following restricts the use of HUC-JIR resources for partisan electoral purposes.

- Use of the campus mail service (other than U.S. mail), college mailing lists, college provided office supplies, computers, email system, telephones, facsimile machines, or copiers, for soliciting votes or campaign fund raising is prohibited.
- Campaign workers, including students, faculty, and staff, are not permitted to engage in person-to-person solicitation of funds through the campus mail service or College-Institute email system.
- No display or distribution of political campaign materials, such as posters, notices, handbills, and banners intended to promote one candidate or party over another, or influence people how to vote are permitted.
- Candidates, political parties, PACs, or any other group working in a partisan political manner may be permitted to use the College-Institute's facilities, including classrooms, meeting rooms, and other facilities only on the same terms and for the same rental fee as other candidates, non-political campaign groups, student organizations, and individuals. Rental fees and other relevant charges must be paid by the group in accordance with existing schedules. Preferential treatment is not permitted.
- No campaign fundraising may take place on College-Institute property, except that which occurs in connection with rentals of College-Institute space as set forth above.
- Campus organizations and departments may use campus mail to publicize political forums and discussions but may not use the mail service to endorse, raise money for or otherwise promote a candidate for public office or a political person, organization or lobby. Organized voter registration activities, voter education programs, and "get out the vote" drives are exempt from the provisions outlined above, provided no attempt is made to influence how people should vote, advance or oppose individual candidates for office or a political party or to promote a position on a public referendum or issue up for vote.

Possession of Weapons Policy

The College-Institute is committed to providing a workplace and educational environment that promotes the health, safety and productivity of its employees, temporary workers, independent contractors, students, and visitors. The College-Institute will not tolerate the possession of weapons in the workplace or on its property.

It is a violation of this policy to possess, transfer, sell, use, or threaten to use an unauthorized weapon or dangerous instrument as defined below (even if licensed to carry a weapon) while at the workplace or on its property.

However, where federal, state, or local laws impose different or additional requirements, the College-Institute will abide by governing law. (See below).

Definitions

1. Workplace includes but is not limited to the College-Institute facilities, parking lots, the College-Institute sponsored events, vehicles on the College-Institute property or used within the scope of employment.
2. A weapon is defined as but not limited to:
 - Firearm (including BB gun, whether loaded or unloaded)
 - Knife (switchblade, hunting knife, etc.)
 - Baton or nightstick
 - Any other martial arts weapons
 - Electronic defense weapons

If you have a question about whether an item is covered by this policy, please see your supervisor or National Office of Human Resources. You will be responsible for making sure beforehand that any potentially covered item you possess is not prohibited by this policy.

Scope

This policy applies to everyone, even those who have a permit to carry a weapon. The only exceptions to this policy are law enforcement officers on official business, security guards engaged by the College-Institute, or other personnel specifically authorized by the President.

Corrective Action

Any employee who, after appropriate investigation, is found to have violated this policy or whose conduct or presence poses a risk to the workplace will be subject to disciplinary action, up to and including termination. Employees who fail to report instances of workplace weapon possession may be subject to disciplinary action up to and including termination. The College-Institute will also take prompt action to address violence or threats of violence, including possession of weapons, by a vendor or visitor.

Upon reasonable grounds for suspicion that a search is necessary for workplace safety, we reserve the right to search employees' personal property, including vehicles, on College-Institute sites.

Exceptions in California and Ohio

California: A search will only be conducted upon reasonable suspicion and written consent.

Ohio: Those who have a valid concealed handgun license (CCW) may possess firearms in their privately- owned motor vehicles in HUC-owned parking lots only if the vehicle is parked in a permitted location and the license holder is in the vehicle with the firearm and any ammunition, or, if the license holder is absent from the vehicle, the firearm and any ammunition must be locked in the trunk, glove box or other closed compartment in or on the vehicle.

Equal Opportunity and Non-Discrimination Policy

The Hebrew Union College – Jewish Institute of Religion (the “College-Institute”), as an institution of higher education, a community of scholars, a religious institution and employer, is committed to the elimination of unlawful discrimination and the provision of equal opportunity in all aspects of education and employment. As a matter of policy and, where applicable, to comply with local, state and federal laws, College-Institute prohibits unlawful discrimination on the bases of race, color, ancestry, national origin, ethnicity, religion (including observance of Sabbath), disability, medical condition, use of service dog, marital and familial status, age, sex, sexual orientation, status as a victim of domestic violence, assault or stalking, gender identity and expression, genetic information, AIDS/HIV, pregnancy, political activities or affiliations, military or veteran status, prior arrests or criminal accusations and, subject to applicable requirements, prior convictions, lawful off-work conduct and any other legally protected status or activity (“protected status”). However, nothing in this policy waives or restricts the ability of the College-Institute, a religious institution, to exercise its First Amendment right to make personnel and other decisions consistent with and according to its Jewish faith.

All personnel actions including recruitment, selection, hiring, training, compensation, benefits, transfers, and promotions for all job classifications shall conform to this commitment. All educational activities, including recruitment, admission and decisions affecting academic standing and status, shall likewise conform. This policy is in aid of creating an environment where all College-Institute constituencies, including students, employees, faculty, administrators, governors, overseers, volunteers, visitors and other third parties with whom the College- Institute community interacts do not engage in and are free from unlawful discrimination.

College-Institute will respond promptly to allegations of discrimination, harassment, and retaliation. The College- Institute will conduct investigations and take appropriate corrective action, including disciplinary action, up to and including dismissal or expulsion, against individuals found to have violated its policies, and provide, where appropriate, assistance to complainants and the College-Institute community.

The College-Institute prohibits retaliation against anyone who submits a complaint of unlawful discrimination or who assists or participates in any manner in a related investigation or proceeding. This provision may not apply to complaints established to have been made with knowing falsity and malice.

For inquiries regarding discrimination, harassment, or retaliation, please contact the EEO and Title IX Coordinator at:

New York Campus Dean, Rabbi David Adelson, (212)-824-2217
Cincinnati Campus Dean, Rabbi Jonathan Hecht, (513) 487-3255
Los Angeles Campus Interim Dean, Dr. Josh Garroway, (203)-376-7233
Jerusalem Campus Interim Dean, Einav Lahav, +972-26203328

Scope of the Policy

This policy applies to all College community members, including students, employees, professors, administrators, visitors, or any third parties performing services on any College campus.

This policy applies not only to discriminatory conduct occurring within the typical classroom or campus settings, but also to any location owned or operated by the College as well as College-sponsored or College- sanctioned functions taking place outside those typical settings. Such College-sanctioned functions include, but are not necessarily limited to, Field-Based Educational Experiences. The College expects that all members of its community will help promote a learning environment free from discrimination. Any off-campus discriminatory conduct that has an actual or potential adverse impact on another’s College environment may also be addressed under this policy.

Discriminatory Harassment

Discriminatory harassment is conduct that has the purpose or foreseeable effect of unreasonably interfering with an individual’s work or academic performance or of creating an intimidating, hostile, or offensive work or learning environment for that individual. It is not necessary that the consequences actually occur; HUC-JIR strives to stop any such conduct before the consequences occur. Discriminatory harassment is harassment that is based on the targeted individual’s disability, race, color, religion, national origin, ancestry, genetic information, marital status, sex, age, sexual orientation, veteran status, or gender identity and expression. Discriminatory harassment includes sexual harassment, which is further defined in the Sexual Misconduct and Interpersonal Violence Policy.

Forms of harassment include, but are not limited to: Epithets, slurs, negative stereotyping, threatening, intimidating or hostile acts relating to race, color, religion, gender, national origin, sexual orientation, age, disability, or any other legally protected class; written or graphic material circulated by any means that creates a hostile or offensive educational environment toward an individual or group of individuals because of their race, color, religion, gender, national origin, sexual orientation, age, disability, or any other protected class.

Examples of sexual harassment can be found in the definition of sexual harassment located in the Sexual Misconduct and Interpersonal Violence Policy.

Please be aware, however, that just because the expression of an idea or point of view may be offensive or inflammatory to some, it is not necessarily discriminatory. HUC-JIR values freedom of expression and the open exchange of ideas. While this value of openness protects controversial ideas, it does not protect harassment or expressions of bias or hate.

Retaliation

The College will not tolerate any form of retaliation taken against anyone who makes a complaint of conduct prohibited by this policy or anyone who cooperates in the investigation of a complaint of conduct prohibited by this policy.

How to Report a Complaint

If your complaint involves conduct of a sexual nature, domestic violence, dating violence, or stalking, please refer to the Sexual Misconduct and Interpersonal Violence Policy.

All other complaints involving conduct prohibited by this policy should immediately be reported to the EEO Coordinator, National Director of Human Resources, 3101 Clifton Ave., Cincinnati, OH 45220, (513) 487-3215.

Alternately, you can make a report or complaint to the Student Support Help Desk, (844) 317-HELP.

If you believe that criminal conduct has been committed, you are encouraged to contact the local police department and/or dial 911 for emergencies.

After receipt of a complaint (or after being put on notice of conduct that may violate this policy), the EEO Coordinator for your campus will take a statement from you regarding what happened. That EEO Coordinator will ask you to describe the accused individual(s) and may ask questions about the scene of the incident, any witnesses, and what happened before and after the incident. If necessary, a referral to the local police department may be made at that time. You may have a support person with you during the interview. Unless you request confidentiality and the College is able to honor that request, an investigation into the incident will begin promptly after you report the incident.

In addition to reporting a complaint to the EEO Coordinator, you may also report a complaint to or seek information from federal or state agencies such as:

- The U.S. Department of Education's Office for Civil Rights ("OCR")
 - Chicago Office (for Cincinnati campus): (312) 886-8434
 - San Francisco Office (for Los Angeles campus): (415) 556-4275
 - New York City Office (for NY campus): (212) 637-6466
- The Ohio Civil Rights Commission ("OCRC"), Cincinnati Regional Office: (513) 852-3344
- The State of California Department of Fair Employment and Housing ("DFEH"): (800) 884-1684 (toll free for complaints and information)
- The New York City Equal Employment Practices Commission: (212) 240-7902
- The New York State Human Rights Commission on Discrimination Complaints: (212) 306-7450

Interim Measures

If your complaint involves conduct of a sexual nature, domestic violence, dating violence, or stalking, please refer to the Sexual Misconduct and Interpersonal Violence Policy.

Interim measures, also known as accommodations, are available upon receipt of a report of discrimination or harassment and prior to the resolution of a complaint, as appropriate. Available interim measures include, but are not limited to, restrictions on contact between an alleged victim and an alleged perpetrator ("no contact" orders); changes in academic or living situations; access to counseling, health, and mental health services at no cost; academic support; victim advocacy; and escort services. If appropriate, the Title IX Coordinator, National Director of Human Resources, generally will offer interim measures upon receipt of a report of sex discrimination, sexual misconduct, domestic violence, dating violence, or stalking. Individuals requesting additional interim measures or experiencing difficulty obtaining interim measures that have been approved should immediately contact the EEO Coordinator.

Interim measures will be offered to a complainant regardless of whether the complainant chooses to participate in a hearing against the accused or whether the complainant chooses to report the incident to law enforcement. To the extent possible, any interim measures that are provided will be confidential.

Protective Measures

In addition to the interim measures described above, other protective measures also may be available by contacting law enforcement and/or the local prosecutor's office. For example, in addition to the normal criminal process, law enforcement and/or the local prosecutor's office may assist a student in obtaining a protection order. A protection order is a temporary order intended to help provide safety and protection to victims of certain crimes. If you have a protection order against someone and that person violates the protection order in any way, law enforcement may be able to arrest that person and charge that person with a violation of the protection order. To the extent possible, any protective measures that are provided will be confidential. If needed and to the extent necessary, HUC-JIR will provide assistance in obtaining a protection order.

Please see the EEO Coordinator for your campus for more information about these protective measures, including for contact information for local law enforcement and/or the local prosecutor's office.

Investigation

If your complaint involves conduct of a sexual nature, domestic violence, dating violence, or stalking, please refer to the Sexual Misconduct and Interpersonal Violence Policy.

While all investigations will vary due to the individual circumstances surrounding the particular complaint, investigations falling under this policy will typically involve the following:

- a. Preliminary review of the complaint by the EEO Coordinator to determine whether probable cause exists to believe a violation of this policy occurred.
- b. Assignment of the investigation from the EEO Coordinator to an investigative team of no fewer than two (2) persons who have been trained annually to investigate complaints.
- c. Notification to the accused that an investigation has commenced.
- d. Interviews of the complainant, the accused, and any witnesses. The accused shall be provided a copy of any written complaint or otherwise informed of the substance of the complainant's allegations. Similarly, the complainant shall be provided with a copy of any written response provided by the accused or otherwise informed of the substance of the accused's response to the allegations.
- e. Gathering and examining of relevant documents or evidence (e.g., law enforcement investigatory records, student and/or personnel files, etc.). Both the complainant and respondent will be asked to provide a list of possible witnesses as well as any written or physical evidence (e.g., test messages, social media postings, emails, photos, medical records, etc.) that they wish to be considered by the investigatory team.
- f. Preparation of an investigatory report complete with a summary of interviews, relevant documents, findings, and recommendations for further action.

Both the complainant and the accused have a right to be accompanied by one support person of his or her choosing during any meeting with an investigator. That support person should not be someone who may be considered a witness. The purpose of the support person is to provide support, not advocate or impede the investigation.

Disciplinary/Adjudication Procedure

If your complaint involves conduct of a sexual nature, domestic violence, dating violence, or stalking, please refer to the Sexual Misconduct and Interpersonal Violence Policy and the Complaint/Grievance Policy – Sexual Misconduct and Interpersonal Violence.

Upon completion of its report, the investigatory team will deliver the report to the EEO Coordinator. In the event that the EEO Coordinator finds that there are reasonable grounds to believe that a violation of this policy has occurred, the EEO Coordinator will issue a notice of violation in writing to the accused and provide a copy of that notice to the complainant. Any notice of violation will also include a recommendation with regard to disciplinary action. In the event that the EEO Coordinator does not find that there are reasonable grounds to believe that a violation has occurred, the EEO Coordinator will notify both the complainant and the accused in writing of that finding.

If either party feels aggrieved by the findings, he or she may challenge those findings through the College's applicable grievance procedure. The procedure for challenging those finding through a grievance can be found in the policy titled "Complaint/Grievance Policy – Discrimination and/or Harassment."

Possible Discipline/Sanctions

Possible discipline or sanctions for engaging in discrimination and/or harassment may include:

- Oral warning
- Letter of warning or reprimand, and a copy placed in the student's file
- Probation
- Forced leave of absence
- Suspension for a defined period of time
- Dismissal from the College

Americans With Disabilities Act

The College-Institute is committed to complying with federal, state, and local laws protecting the rights of individuals with disabilities. The College-Institute recognizes that some individuals with disabilities may require accommodations. Consistent with those laws, College-Institute will make a reasonable accommodation(s) for the known physical or mental limitations of an otherwise qualified individual with a disability unless an undue hardship or direct threat to the individual or others would result.

Any student who requires an accommodation in order to access an equitable academic experience should contact the Office of Student Support and request such an accommodation:

Director of Student Support, Rabbi Andrew A. Goodman, 212-824-2252

Students' Disability Services Policy (huc.edu/sites/default/files/About/policies/2017/Disability.pdf) contains more information and specific contact information.

Accommodations

Students who believe they will need academic or other accommodations to participate as fully as possible in the activities related to their academic program at the College-Institute should make those needs known as early as possible, preferably as soon as they have received notification of acceptance.

Accommodations are adjustments made for students with disabilities with the goal of allowing them to access the same educational experiences as their peers to the extent possible. Generally, a person with a disability is an individual who has a physical or mental impairment that substantially limits one or more major life activities. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Accommodations are equitable modifications of the learning environment that eliminate, as much as practicable, physical, or instructional barriers to learning encountered by the student with a disability. An accommodation is considered appropriate if the accommodation is feasible and reasonable in its alternative method or format and does not impose an undue burden or hardship on the school. Accommodations are individualized and dependent on the nature of the specific disability or disabilities.

Accommodations are provided on an individual basis according to documentation provided by the student, tailored to individual needs, and may include, but are not limited to the following:

1. Notification letters to professors
2. Quiet room in which to take examinations.
3. Flexible deadlines for assignments
4. Extended time for reading assignments.
5. Extended time for examinations.
6. Alternate format textbooks. (e.g. Pdf- or Word-formatted books E-books)
7. In-class note taker. (The request is made in cooperation with professor.)
8. Oral reader for exams
9. Recording device in classroom
10. Computer in class
11. Preferred seating in the classroom.

Accommodation requests that (1) alter *requirements* that are *essential* to the program of instruction, (2) cause a fundamental alteration in the nature of a specific course or academic program, (3) impose *undue* financial or administrative burden, or (4) pose an appreciable threat to personal or public safety are deemed unreasonable and will not be granted.

The College-Institute will assess on a case-by-case basis whether a particular accommodation request would cause undue hardship. An “undue hardship” is a significant difficulty or expense and focuses, among other factors, on the resources and circumstances of the school in relationship to the cost or difficulty of providing a specific accommodation. Undue hardship refers not only to financial difficulty, but to accommodation requests that are unduly extensive, substantial, or disruptive, or those that would fundamentally alter the nature or operation of a course or program of study.

Additionally, the College-Institute commits itself to making its campuses accessible. The campus Director of Student Support will work with the campus Operations Manager to ensure that the campus is physically accessible to the degree practicable. Where applicable, handicap-accessible parking will be made available. Classes may be relocated to rooms that are physically accessible to meet student and faculty needs.

Alternative textbooks

Students who need alternative textbooks, such as textbooks in PDF format, should make this request as soon as their course syllabus is made available. Students should contact the Director of Student Support.

E-books

Students may wish to purchase e-books, when possible, to use with their speech-to-text readers. Many publishers provide textbooks through third-party resources such as BookShare and Accessible Textbook Network (ATN.)

Procedures and Policies

Request for Services All students in need of disability services must notify the Director of Student Support as soon as possible after the need for an accommodation becomes apparent. In order to begin the process of assessing potential accommodations as soon as possible, it is preferable that students notify the Director of Student Support upon registration for classes of such need. The student will be assigned to meet with the Director of Student Support to discuss his or her needs and recommendations.

A student previously diagnosed with a disability and who used academic accommodations in a prior educational setting must request that a copy of their test results and recommendations be sent to the Director of Student Support.

If a student is seeking an accommodation for a learning disability for the first time and has not used an academic accommodation at a prior educational setting, the student must provide updated documentation of the student's disability. Documentation should be completed and signed by a professional familiar with the student and the student's disability such as a physician, psychologist, or rehabilitation counselor. It should verify the disability, its impact on the student's ability to function and suggest appropriate accommodations.

At a minimum, the documentation must be sufficient to apprise the College-Institute that the student currently has a disability that excludes the student from participation in, denies the student the benefits of, or otherwise subjects the student to discrimination in any program or activity.

The Director of Student Support will review the documentation and any requested accommodations. If necessary, the Director of Student Support will discuss any alternative recommended accommodations with the student. The Director of Student Support will notify the student of the determination and, if appropriate, any accommodations to be implemented.

If the accommodation is to be used in a specific class(es), the student, working with the Director of Student Support, must notify the faculty member responsible for the class(es) as soon as the determination is reached.

Students receiving accommodations must meet with the Director of Student Support at the beginning of each semester to review their status and, if necessary, update their records.

If a student feels that their accommodations are not being met, they must immediately notify the Director of Student

Support or the Provost.

NOTE: *The College-Institute does not provide diagnosis of learning disabilities or differences or the educational therapies to address those disabilities or differences. Any expense a student incurs for testing and diagnosis of a disability is borne by the student. The College-Institute reserves the right to conduct its own independent evaluation, as necessary.*

Confidentiality Notice

Except where necessary to further the purpose of this policy or where otherwise required by law, all Disability Services student information will be kept strictly confidential. Release of personal or disability information is at the discretion and instruction of the student. Any unauthorized review, use, disclosure, or distribution of disability documentation is prohibited. Notification to faculty of a student's need for accommodation will only be carried out upon the written permission of the student. No further information regarding the student's disability may be shared within the College-Institute unless the student authorizes the release of the information.

Even if a student registered with Disability Services openly discusses their disability, College-Institute staff and faculty are not permitted to discuss disclosed information with others.

Request for Reconsideration

If a student's request for accommodation is denied or the student is otherwise dissatisfied with the result of their accommodation request, the student should request a meeting with the Director of Student Support to present additional information and/or documentation and to discuss the nature of the issue or complaint. This meeting should be requested within 30 calendar days of the date that the conflict or issue arises. For concerns relating to the denial of accommodations, the Director of Student Support may engage an outside consultant to review the documentation and provide recommendations to the Office. The Director of Student Support may contact faculty, administrators or professionals that can provide information pertinent to the case. If confidential information is to be released to or received by a third party not affiliated with the College-Institute, the student will be asked to sign a release of information form. Following the review of the request for reconsideration, the Director of Student Support will notify the student of the decision within 30 calendar days.

Review by the Provost: If the issue is not resolved through reconsideration, the student may request a review of the process by the Provost within 30 calendar days of receiving the decision on reconsideration. The student should submit a detailed written account of the issue and sign and date the document. The Provost will make an inquiry into the complaint and may contact faculty, administrators or professionals who can provide information pertinent to the case. Every effort will be made to resolve the grievance within 30 calendar days or as expeditiously as possible. The student will be contacted in writing with a final decision regarding the request.

Students are not required to use the internal reconsideration process and may contact the Office of Civil Rights of the U.S. Department of Education in order to file a complaint. Information on filing a complaint is available on their website: www2.ed.gov/ocr

The U.S. Department of Education's Office for Civil Rights ("OCR"):

- Chicago Office (for Cincinnati campus): (312) 886-8434
- San Francisco Office (for Los Angeles campus): (415) 556-4275
- New York City Office (for NY campus): (212) 637-6466
- The Ohio Civil Rights Commission ("OCRC"), Cincinnati Regional Office: (513) 852-3344
- The State of California Department of Fair Employment and Housing ("DEFE"): (800) 884-1684 (toll free for complaints and information)
- The New York City Equal Employment Practices Commission: (212) 240-7902
- The New York State Human Rights Commission on Discrimination Complaints: (212) 306-7450

The College-Institute prohibits retaliation against anyone who seeks an accommodation or who seeks reconsideration under this section or otherwise complains that he or she has been denied equal access in the form of appropriate accommodations or has suffered discriminatory harassment. This prohibition of retaliation similarly extends to anyone who assisted or participated in any manner in an investigation or proceeding relating to a complaint under this section.

In the event that the College-Institute finds that any student has suffered discrimination or harassment relating to his or

her disability, the College-Institute will take immediate measures to remediate and/or correct the discrimination or harassment. Any individual who is subject to such discrimination or harassment will be notified of the College-Institute's measures to remediate and/or correct such conduct.

Training

The College-Institute Director of Student Support will arrange training. Occasional updates regarding changes to College-Institute, state, and Federal policies will also be provided as needed.

Policy Against Unlawful Harassment

Unlawful harassment is a kind of discrimination based on a person's protected status as set forth in our EEOC policy and is prohibited. Please see our EEO and Non-Discrimination Policy, incorporated here (<http://huc.edu/equity-inclusion/equal-opportunity-and-non-discrimination>). Also, see our Sexual Misconduct and Internal Personal Violence Policy (<http://huc.edu/equity-inclusion/what-our-policy>).

Harassment Prohibited

Sexual Harassment Defined ("Quid Pro Quo")

No one who supervises or otherwise exercises control over the terms and conditions of an individual's employment or academic status shall threaten or insinuate either explicitly or implicitly that refusal to submit to sexual advances will adversely affect them with regard to a term or condition of employment or education or that submission to such advances will positively affect the individual with respect to a term or condition of employment or education.

Sexual and Other Prohibited Harassment Defined ("Hostile Environment")

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature may constitute sexual harassment when such conduct has the purpose or effect of substantially interfering with an individual's work or academic performance or creating an intimidating, hostile or offensive working or academic environment.

This definition applies to all legally protected statuses, not just sex, including but not limited to, race, color, national origin, ethnicity, religion, disability, age, sexual orientation, gender identity or expression and pregnancy.

Any unwelcome verbal or physical conduct, whether committed by a peer or someone with control over an individual's employment or education, may be viewed as harassment where such conduct is because of a protected status and has the purpose or effect of substantially interfering with an individual's work or academic performance or creating an intimidating, hostile or offensive working or academic environment.

It is important to know that inappropriate communications or conduct may be reason for intervention and discipline whether or not they are actually "harassing" as a matter of law. We cannot list all examples of poor judgment or unprofessional conduct that are prohibited. However, the following examples will serve to illustrate the kind of speech or behavior we do not want in our academic or work environments. Prohibited conduct, whether or not unlawful, includes such things as:

- Subtle pressure for sexual activity
- Squeezing, rubbing, pinching or other forms of unwanted physical contact
- Degrading words, jokes or innuendos based on a protected status
- Sexually, ethnically, or racially suggestive or demeaning objects or pictures, video, or audio recordings, electronic (including e-mail) or written communications
- Suggestive or insulting sounds or whistles; obscene phone calls; sexting
- Epithets, slurs, negative stereotyping
- Threatening, intimidating or hostile acts relating to any legally protected class
- Pornography
- Written or graphic material that degrades or demeans an individual or group of individuals because of their protected status.

The College-Institute adheres to the principles and traditions of academic freedom and recognizes that these freedoms must be in balance with the rights of others, including the right of individuals not to be unlawfully harassed. It is understood that the principles of academic freedom permit topics of all types, including those with sexual content, to be part of courses, lectures, and other academic pursuits. Materials with sexual or other potentially controversial content that are used or displayed in an educational setting should be related to educational purposes.

Consensual Relations

Consensual sexual or romantic relationships between individuals, one of whom exerts institutional control or influence over the terms and conditions of the other's employment or education, while not unlawful, are problematic. Such relationships threaten the integrity and trust needed in professional relationships and increase the potential for coercion of those in subordinate positions. Consensual romantic and sexual relationships between those of unequal authority and influence may, and often do, lead to harm.

- Such relationships can be detrimental to the employment and/or educational process due to the creation of dual roles and may undermine the integrity of the supervision and evaluation provided.
- Such sexual relationships may lead to or are often perceived by fellow students or coworkers as opportunities for favoritism and biased treatment.
- If a charge of sexual harassment is subsequently lodged, it may be exceedingly difficult to prove mutual consent. Such relationships between peers will not be cause for intervention absent detriment or disruption to the College-Institute. However, consensual may change to non-consensual. That change, if it occurs, is to be immediately respected and accepted. If not, then the individual who has withdrawn consent, is to immediately report under this Policy.

The College-Institute is committed to protecting the academic freedom and freedom of expression of all members of its community and respects the privacy rights of individuals. However, both are subject to intervention when it causes disruption or other harm to the working or academic environment.

Therefore, it is the College-Institute's policy that romantic or sexual relationships between an individual and one over whom s/he exerts control with respect to the terms and conditions of employment or education is prohibited. In the event that a consensual relationship preexists a subsequently developed relationship of unequal influence or authority, the specific circumstances will be reviewed on a case-by-case basis to determine whether an exception to this provision is warranted with the development of appropriate safeguards.

Abusive Conduct

Abusive Conduct is also prohibited. Abusive Conduct, for purposes of this policy, means conduct of a member of the College-Institute community in the workplace or academic environment, with malice, that a reasonable person would find hostile, offensive and unrelated to the College-Institute's legitimate business or academic interests. Abusive Conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating or humiliating, or the gratuitous sabotage or undermining of a person's work or academic performance. A single act shall not constitute Abusive Conduct, unless especially severe and egregious, but may nonetheless require appropriate corrective action.

Procedures for Reporting Harassment and/or Abusive Conduct for Students

Please use the Reporting Process under the Sexual Misconduct and Interpersonal Violence Policy and Complaint Procedure (<http://huc.edu/equity-inclusion/what-our-policy>).

Investigating Claims of Harassment or Abusive Conduct

Once a report under this Policy has been made, an investigative team of no fewer than two persons will talk with all parties, individuals named by the complainant and by the respondent and anyone else whom the investigators deem appropriate. Prior to commencing the investigation, the investigators will obtain from the complainant and respondent a signed agreement to participate in the process. Refusal by a party to participate in the process may impede the investigation and, where appropriate, result in disciplinary action.

After obtaining the agreements to participate, the investigators will give the respondent a copy of the complaint. The respondent must provide the investigators with a written response within five days. A copy of the response will be given to the complainant upon receipt by the investigators. The investigators will then commence interviews. Any written material provided by one party to the investigator during the investigation must be shared by the investigators with the other party unless doing so would adversely affect someone in the community.

The investigators will conduct a thorough, impartial, and timely investigation. The privacy of the parties will be respected

to the fullest extent possible. Information will be given to individuals other than the parties only on a “need to know basis” for purposes of the investigation, resolution, or legal compliance.

Upon completion of the investigation, the investigators will prepare a report. It will note who was interviewed and any additional forms of information obtained. A summary of interviews will be included along with any relevant documents. The report, along with the original complaint and response, will be sent to the Grievance Review Panel. The purpose of the Grievance Review Panel is to review the investigative report and listen to each party and determine the outcome.

Grievance Review Panel Process

The Grievance Review Panel, not the complainant or respondent, has the burden of proof. The Panel constructs the proof from the material it assembles – primarily through the investigators. The Panel determines what evidence is relevant and what witnesses, other than the complainant and respondent, will be heard. The task of each party is to state clearly how the evidence relates to the allegations. The Panel may ask the investigators to provide additional materials prior to the hearing.

Once the Panel has met initially and reviewed the investigators’ materials, the materials to be used or referenced in the hearing will be given to both parties, unless doing so will seriously adversely affect any member of the College-Institute community. Any materials given to one party must be given to the other.

Both parties will receive at least one week’s advance written notice of the time and place of the hearing. The investigators will attend the hearing and deliberations as resource persons but will not participate in questioning any witnesses or vote on findings or sanctions.

Each party speaks individually with the Panel. The other party is not present. The party may be accompanied by and confer with a support person of his or her choosing, including legal counsel, but only the party is allowed to speak directly to the Panel. The College-Institute may also invite its legal counsel as a non-speaking participant. The Panel will hear the complainant first. It may hear any other witnesses and the respondent in whatever order it determines. The Panel may re-interview a party if it determines it necessary for clarification.

The Panel will explain its process to each party and give each party an opportunity to make brief opening and closing statements. The Panel will devote the remainder of the time to asking questions to clarify the written materials, witness testimony or any other relevant issues it elects to address.

The Panel will reach its decision based on a preponderance of the evidence. This is a qualitative not a quantitative standard and means: “whether or not it is more likely than not that a violation of the harassment policy occurred.”

The Panel will keep official minutes of the hearing and provide a written summary of its deliberations. The official minutes and summary are available to both parties. Generally, the minutes will name witnesses interviewed in the hearing and the deliberation’s summary will reflect the materials considered. If either adversely affects anyone, names will be removed from the copies given the parties. The personal notes of Panel members shall not be available and will be destroyed at the end of the process, to the degree legally permissible.

In deliberations, the Grievance Review Panel shall attempt to reach a consensus. If consensus cannot be reached, a vote shall be taken. All decisions of the Panel shall be made by a majority. When the Panel is not unanimous in its findings or sanctions, the deliberation’s summary shall record both majority and minority opinions. The summary shall be signed by all members of the Panel. In the summary there will be no recording of the negative or affirmative votes of any individual members of the Panel.

No later than two weeks after the hearing concludes, the Panel shall send to the complainant and to the respondent a copy of the minutes of the hearing and the summary of the deliberations. The deliberation’s summary will note the sanction(s) to be imposed, if any. The minutes and summary shall also be sent to the Dean of the campus, the Provost, the President, and the College’s Counsel.

Formal Sanctions

When the finding is that a violation of this Policy has occurred, sanctions shall be imposed upon the offender. If there are previous incidents on file in the Dean’s office involving the offender, those may be shared with the Panel after their finding has been reached, but before sanctions are imposed.

Possible sanctions upon faculty, administration and staff may include, but not be limited to:

- Training
- Verbal warning
- Letter of warning or reprimand, and a copy of the corrective action placed in the personnel file of the offender
- Prohibition to participate in grading, recommendations, reappointment, and promotion decisions or other evaluations concerning the complainant
- Denial of access to College-Institute resources, such as travel/research funds or merit or cost of living salary increases for a specific period
- Suspension without pay for a specific period
- Dismissal from the College-Institute in accordance with the established procedures Retaliation

Retaliation is action against anyone who makes a complaint of conduct prohibited by this policy or anyone who cooperates in the investigation of a complaint of conduct prohibited by this policy that will have the effect of discouraging a reasonable person from making such a complaint or cooperating in a complaint's investigation. The exercise of rights protected under the First Amendment does not constitute prohibited retaliation nor does charging an individual with a Code of Conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding provided that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

A complainant whose allegations are found to be both demonstrably false and brought with malicious intent will be subject to disciplinary action which may include, but is not limited to, written warning, demotion, transfer, suspension, dismissal, expulsion or termination.

Any act of retaliation is a violation of this policy and will be investigated and adjudicated accordingly. If a student or employee believes he or she has been retaliated against under these circumstances or observes or is aware of such retaliation, he or she must immediately report this to his or her supervisor, the Dean, the National Director of Human Resources or, in the case of students, to Rabbi Andrew Goodman, Director of Student Support, (212) 824-2260.

Record and Monitoring

The record of all formal grievance procedures and any appeals shall be placed in locked files in the offices of the President and the Director of Human Resources. All other copies will be destroyed except a notation of the file's existence will be kept in the Dean's office of the campus where the complainant and respondent are located. The record will include the written complaint and response, a copy of the policies and procedures in place at the time of the event, the minutes of the proceedings and the statement of finding and deliberations summary and any sanction(s).

Access to the record will only be by order of legal process or at the discretion of the President and/or Human Resources Director.

Except as otherwise prohibited by law, (1) requests for access by a certifying or licensing body or Jewish professional association responsible for either party will be given substantial deference and generally be permitted; and (2) if there is a finding that a policy violation has occurred, the Provost shall report the finding to the Placement Director of the Jewish professional association responsible for the offender.

Misconduct by Those External to the Community

The College-Institute will also take prompt remedial action to address perceived violations of this Policy by a vendor, visitor, customer or external third party with whom it has dealings.

The reporting procedures above will apply, although the investigative and adjudicative processes may differ.

Title IX Application

This policy against unlawful harassment applies to protected statuses other than sex. When the protected status at issue is sex, both this policy and the Sexual Misconduct Policy may apply. In that event, the procedures set forth under the Sexual Misconduct Policy, consistent with Title IX's requirements, will take precedence.

Sexual Misconduct and Interpersonal Violence Policy and Complaint Procedure

<http://huc.edu/sexual-harassment-sexual-assault-sexual-misconduct-reporting-form>

Title IX of the Education Amendments of 1972 prohibits sex discrimination in educational programs and activities and in the terms and conditions of employment. All public and private schools, school districts, colleges and universities receiving federal funds must comply with Title IX. If you have experienced sexual discrimination, please review this policy for information about your Title IX rights. For purposes of this policy, sexual discrimination includes, but is not limited to, sexual harassment, sexual misconduct, sexual violence, relationship or dating violence, domestic violence and stalking (collectively referred to throughout this policy as “Prohibited Conduct.”). Title IX’s protections extend to faculty, administrators, staff, and students in both the work and academic environments. For more information about your rights in this regard, please carefully review this policy in its entirety. For information about harassment on the basis of other protected statuses, in addition to sex, see our Policy Against Unlawful Harassment (<http://huc.edu/equity-inclusion/what-our-policy>). The Hebrew Union College-Jewish Institute of Religion (“College-Institute”) has adopted a grievance procedure that provides for the prompt and equitable resolution of student and employee complaints. For more information about our appeal and grievance procedure, see Appeal/Grievance Procedure-Sexual Misconduct and Interpersonal Violence.

The College-Institute does not tolerate any form of Prohibited Conduct. All individuals, whether governors, overseers, volunteers, students, staff, faculty, or administrators, found in violation of this policy shall be subject to disciplinary action up to and including suspension, expulsion, dismissal, or termination.

In dealing with members of the College-Institute community, individual integrity and respect are the primary focus of the College-Institute's concern. The College-Institute seeks to foster a climate free from Prohibited Conduct through a coordinated education and prevention program, the promulgation of clear and effective policies, as well as investigative and grievance procedures that are prompt, equitable, and accessible to all. In the event that the College-Institute finds that instances of Prohibited Conduct have occurred under the scope of this policy, the College-Institute will take immediate and appropriate steps to eliminate the misconduct, prevent its reoccurrence, and address its impact. A finding of no Prohibited Conduct under this Policy does not preclude a finding that another policy may have been violated.

Title IX Coordinator

Contact the National Human Resources office in order to reach the designated Title IX Coordinator for the College-Institute. The Title IX Coordinator for the College-Institute may be contacted at 3101 Clifton Avenue, Cincinnati, OH 45202: 513-487-3215.

Any questions concerning or related to this Policy should be directed to the Title IX Coordinator or the Deputy Title IX Coordinator, 212-824-2252.

Scope of the Policy

This Policy applies to all College-Institute community members, including governors, overseers, volunteers, students, prospective students, employees, applicants, faculty, administrators, and to those parties with whom our students and employees come into contact in the course of their employment or academic activity. Any person may report Prohibited Conduct (whether or not the reporter is the purported victim) in person, by mail, by telephone or by electronic mail to the Title IX Coordinator or the Dean of the Campus at issue and the report may be made at a time beyond normal office hours.

This Policy applies not only to Prohibited Conduct occurring within the typical classroom or campus settings, but also to any location owned or operated by the College-Institute as well as College-Institute-sponsored or College-Institute-sanctioned functions taking place outside those typical settings. Such College-Institute-sanctioned functions include, but are not necessarily limited to, Field-Based Educational Experiences. The College-Institute expects that all members of its community will help promote a learning and working environment free from Prohibited Conduct. Any such off-campus conduct that has an actual or potential adverse impact on another individual's work or academic environment may also be addressed under this policy.

The College-Institute may consider the effects of off-campus misconduct when evaluating whether there is Prohibited

Conduct under this policy.

Retaliation

The College-Institute will not tolerate any form of retaliation or unlawful interference taken against anyone who makes a complaint of conduct prohibited by this policy or anyone who cooperates in the investigation of a complaint of conduct prohibited by this policy.

Sexual Misconduct

Sexual misconduct includes, but is not necessarily limited to, sexual harassment, dating and/or domestic violence, sexual assault, sexual coercion, sexual exploitation, sexual intimidation or coercion, indecent exposure, and stalking.

Definitions

Sexual Harassment: Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on gender (opposite or same sex), gender identity, or sexual orientation when (1) submission to the conduct is an explicit or implicit term or condition of employment decisions or academic decisions; (2) submission to or rejection of the conduct is used as the basis for employment or academic decisions; or (3) the conduct has the purpose or effect of unreasonably interfering with a person's performance or creating an intimidating, hostile or offensive working or academic environment.

Sexual Assault: Sexual assault is any forced or coerced sexual activity, committed against a person's will or without consent. Rape is a sexual assault that includes but is not limited to forcing or attempting to force vaginal, anal, and oral penetration. In addition to rape, sexual assault also includes having or attempting to have sexual contact of any kind with another individual without consent. Sexual contact can include, but is not limited to, kissing, touching the intimate parts of another, causing the other to touch one's intimate parts, or disrobing another without permission or consent.

Rape and sexual assault are crimes of violence with sex used as a weapon that can be committed by strangers, friends, relatives, dates, boyfriends, girlfriends, partners, lovers and/or spouses.

Sexual Exploitation: Sexual exploitation includes when a person takes sexual advantage of another person for the benefit of anyone other than that person without that person's consent. Examples of sexual exploitation include, but are not limited to, photographing or recording someone involved in sexual activity or in a state of undress without that person's knowledge or consent; voyeurism; non-consensual streaming or transmitting of images or video of another person involved in sexual activity; prostituting another person; or deliberately inducing incapacitation of another, with the specific intent to impair their ability to knowingly give or withhold consent.

Indecent Exposure: Indecent exposure includes the intentional exposure of one's private or intimate parts of the body or engaging in any sexual conduct in a place where the conduct involved may reasonably be expected to be viewed by and affront others.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the complaining party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. The violence covered by this definition includes, but is not limited to, sexual or physical abuse or the threat of such abuse, psychological abuse, and/or social isolation.

Domestic Violence: Violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred. The violence covered by this definition includes, but is not limited to, sexual or physical abuse or the threat of such abuse, psychological abuse, and/or social isolation.

Stalking: Stalking includes repeated conduct involving unwanted attention, harassment, physical or verbal contact, or any other repeated conduct that would cause a reasonable person to fear for the person's safety (or the safety of others) or suffer substantial emotional distress. This includes, but is not necessarily limited to, making unwelcome appearances at another's residence; unwelcome contact via phone calls, text messages, or emails; and/or unwelcome contact through various internet or social media avenues (i.e. Facebook, Twitter, etc.).

Sexual Coercion/Intimidation: For purposes of this policy, sexual coercion means the use of unreasonable measures, including physical force or threats, in an attempt to force another to initiate or continue sexual activity against their will. Coercion may exist where such measures impair an individual's ability to make a voluntary choice whether or not to engage in sexual relations.

Consent: Consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. Someone who is incapacitated (e.g., due to the use of alcohol or drugs; when an individual is unconscious or asleep; involuntary restraint; or because the individual suffers from any disability rendering him or her incapable of consent) cannot give consent. Prior consent to a sexual act and/or prior sexual relations between parties cannot be used by itself to assume present consent. Consent must be ongoing throughout any sexual activity and can be withdrawn at any moment. Consent is not present when it is the result of coercion, intimidation, force, or threat. Intoxication by alcohol or drugs does not excuse the person initiating the sexual act from ensuring that consent is present. The person initiating the sexual act must take all reasonable steps to ensure consent is present. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression.

Actual Knowledge: Actual knowledge means notice of sexual harassment or allegations of sexual harassment to the Title IX Coordinator, the Campus Dean or any administrator who has the authority to institute corrective measures. Imputation of knowledge based solely on vicarious liability or constructive notice is not actual knowledge. The actual knowledge standard is not met when the only person with actual knowledge is the accused. The mere ability or obligation to report prohibited conduct or to inform an individual about how to report it does not qualify an individual as one who has the authority to institute corrective measures.

Formal Complaint: Formal complaint means a document filed by a complainant or signed by the Title IX Coordinator alleging prohibited conduct by a respondent and requesting that the allegations be investigated. At the time of filing the formal complaint, a complainant must be participating or attempting to participate in the College-Institute's education programs or employment.

Retaliation: Retaliation is action against anyone who makes a complaint of conduct prohibited by this policy or anyone who cooperates in the investigation of a complaint of conduct prohibited by this policy that will have the effect of discouraging a reasonable person from making such a complaint or cooperating in a complaint's investigation. The exercise of rights protected under the First Amendment does not constitute prohibited retaliation nor does charging an individual with a Code of Conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding provided that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

The above definitions are those used by the College-Institute for its disciplinary policies. If you are interested in the specific criminal law definitions of the foregoing terms (to the extent they exist) in the state where your campus is located, please contact the Title IX Coordinator. Additionally, the educational programming described below will be tailored to your specific campus so as to provide another resource available to educate you regarding the above terms.

Options and Recommendations for Assistance

Interim Measures: Interim measures, also called supportive measures, are non-disciplinary, non-punitive individualized services offered, as reasonably available, and without fee or charge to the complainant or the respondent. Such measures are designed to restore or preserve equal access to the College-Institute education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties, the College-Institute's educational environment, or deter prohibited conduct. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of

work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

Protective Measures: In addition to the interim measures described above, other protective measures also may be available by contacting law enforcement and/or the local prosecutor's office. For example, in addition to the normal criminal process, law enforcement and/or the local prosecutor's office may assist an individual in obtaining a protection order. A protection order is a temporary order intended to help provide safety and protection to victims of certain crimes.

If you have a protection order against someone and that person violates the protection order in any way, law enforcement may be able to arrest that person and charge that person with a violation of the protection order. If needed and to the extent necessary, the College-Institute will provide assistance in obtaining a protection order.

Please contact the Title IX Coordinator for more information about these protective measures, including for contact information for local law enforcement and/or the local prosecutor's office.

Educational Programming: The College-Institute provides educational programming designed to target, prevent, and eliminate Prohibited Conduct. That programming includes, but is not necessarily limited to, primary prevention programs, awareness programs, ongoing prevention and awareness campaigns, programs regarding bystander intervention, and programs regarding risk reduction.

Medical Treatment and Services: If you have been the victim of Prohibited Conduct, it is important and necessary to immediately seek any appropriate follow-up medical attention for several reasons: first, to assess and treat any physical injuries you may have sustained; second, to determine the risk of sexually transmitted diseases or pregnancy and take preventive measures; and third, to gather evidence that could aid criminal prosecution. Physical evidence should be collected immediately, ideally within the first 96 hours. It may be collected later than this, but the quality and quantity of the evidence may be diminished. A special exam should be conducted as soon as possible following any physical harm to make sure of your physical well-being and to collect evidence that may be useful in criminal proceedings. Even if you have not been physically hurt, this special exam is strongly recommended to maintain all your legal options. After the evidence is collected, it is stored in case you wish to press criminal charges. The exam is typically performed by a Sexual Assault Nurse Examiner (S.A.N.E.).

Advocacy, Counseling, Emotional Support, and Other Services Available: Contact information for Additional Resources and Services is located below.

Awareness and Preparation: Often times your first line of defense to any type of harm is your own awareness and preparation. Be aware of your capabilities and limitations. Your judgment and thinking will often be your best weapons. Evaluate the situation for possible avenues of escape. Your first concern should be for your safety and survival. Use your judgment to do what is necessary to save your life. That may involve making a scene or drawing others' attention so that the assailant leaves. It may buy you enough time to escape. It may involve fighting back. It may mean not physically resisting. If you choose not to physically resist the attack, it does not mean that you have asked to be assaulted or harmed. It means that you did what you needed to do to survive. Remember - there is no one "right" way to respond. The person being attacked is the best judge of which options will work well for him or her in that situation.

This information, as well as other information throughout this policy, is designed to assist in reducing the risk of violence in the College-Institute community. Risk reduction information is designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

Recommended Steps if you are the Victim of Prohibited Conduct:

- (1) Get to a safe place as soon as you can. Try to preserve all physical evidence.
- (2) If it can be avoided, do not wash, use the toilet, or change clothing. If you do change clothes, put all clothing you were wearing at the time of the attack in a bag separated from other materials.
- (3) Get medical attention within 96 hours, if possible, to make sure you are physically well and to collect important evidence in the event you may later wish to take legal action. If the incident occurred on a College-Institute Campus, immediately contact the Title IX Coordinator, the local police, or any on-campus security. For campus security, contact:
Cincinnati: 1-513-383-2559

New York: 1-212-824-2282
Los Angeles: 1-213-745-7758

We advise you to add these numbers to your phone's contact list.

- (4) Contact and report the incident to the Title IX Coordinator. The Title IX Coordinator will assist you in notifying any other appropriate authorities.
- (5) Contact someone you trust to be with you and support you.

How to Report a Complaint

You should immediately report any complaint of Prohibited Conduct by contacting the Title IX Coordinator or the Deputy Title IX Coordinator, either of whom may delegate responsibility for investigation to a Designated Campus Official ("Designated Campus Official").

Alternatively, you can make a report or complaint to the Student Support Help Desk, (844) 317-HELP.

You may also always contact the local police department and/or dial 911 for emergencies. Although you are under no obligation to do so, if you choose to involve law enforcement, the Title IX Coordinator will assist you in notifying the local police department.

Depending on when the conduct at issue took place, either the Title IX Coordinator or Designated Campus Official will take a statement from you regarding what happened. That individual will ask you to describe the accused individual(s) and may ask questions about the scene of the incident, any witnesses, and what happened before and after the incident. A referral to the local police department may be made at that time. You may have a support person with you during the interview. Unless you request confidentiality and the College-Institute is able to honor that request, an investigation into the incident will begin promptly after you report the incident.

The Title IX Coordinator or Designated Campus Official will also provide you with a written explanation of your rights and options under Title IX and this policy which will include, but may not be limited to, your right to make a report to local law enforcement, your right to file a complaint with the College-Institute, your right to be free from retaliation for reporting an incident, and your right to receive assistance and resources from the College-Institute.

In addition to reporting a complaint to a College-Institute official, you may also report a complaint to or seek information from federal or state agencies such as:

- The U.S. Department of Education's Office for Civil Rights ("OCR")
 - Chicago Office (for Cincinnati campus): (312) 886-8434
 - San Francisco Office (for Los Angeles campus): (415) 556-4275
 - New York City Office (for NY campus): (212) 637-6466
- The Ohio Civil Rights Commission ("OCRC"), Cincinnati Regional Office: (513) 852-3344
- The State of California Department of Fair Employment and Housing ("DEFE"): (800) 884-1684 (toll free for complaints and information)
- The New York City Equal Employment Practices Commission: (212) 240-7902
- The New York State Human Rights Commission on Discrimination Complaints: (212) 306-7450

Any sexual abuse of a minor by teachers, staff or volunteers affiliated with the College-Institute must be reported to the College-Institute and to law enforcement or a similar agency. This duty to report applies to medical personnel working at a dispensary, clinic, infirmary, student health center, athletic facility, or similar facility.

Investigation

All complaints of Prohibited Conduct will be addressed in a prompt and equitable manner, including in instances where there is a pending law enforcement proceeding. The College-Institute will not delay its own independent investigation until after a criminal investigation, if any, is complete. Additionally, because the College-Institute has a duty to provide a safe and non-discriminatory environment for all students, the College-Institute may be required to conduct an investigation into an incident regardless of whether a formal complaint is filed.

The College-Institute has a duty to complete certain publicly available recordkeeping including reporting and disclosing information about certain crimes pursuant to a federal law known as the Jeanne Clery Disclosure of Campus Security

Policy and Campus Crime Statistics Act. However, duties under the Clery Act will not require the College-Institute to report or disclose a complainant's personally identifying information. Nonetheless, even where the College-Institute cannot guarantee confidentiality, your privacy will be maintained to the greatest extent possible. If confidentiality cannot be guaranteed, the information you provide will be relayed only as necessary for effective investigation and/or resolution.

Typical Steps in an Investigation of a Formal Complaint of Prohibited Conduct: While investigations may vary due to the individual circumstances surrounding the particular complaint, investigations falling under this policy will typically involve the following:

1. Preliminary review of the complaint by the Title IX Coordinator or Designated Campus Official to determine whether probable cause exists to believe a violation of this policy occurred.
2. Assignment of the investigation from the Title IX Coordinator to an investigator who has been trained annually to investigate complaints.
3. Written notification to the complainant and the accused will include the following:
 - Details of the alleged prohibited conduct known at the time, including the identities of the involved parties;
 - The date and location of the prohibited conduct, if known;
 - A statement that an accused is presumed not responsible for the alleged conduct and that a determination regarding responsibility for the prohibited conduct is made at the conclusion of the grievance process;
 - The parties' right to an advisor of their choice who may be, but is not required to be, an attorney;
 - The parties' right to inspect and review evidence; and
 - The Code of Conduct provision that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.
4. Interviews of the complainant, the accused, and any witnesses. The accused shall be provided a copy of any written complaint or otherwise informed of the complainant's allegations. Similarly, the complainant shall be provided with a copy of any written response provided by the accused or otherwise informed of the accused's response to the allegations.
5. Gathering and examining of relevant documents or evidence (e.g., law enforcement investigatory records, student and/or personnel files, etc.). Both the complainant and respondent will be asked to provide a list of possible witnesses as well as any written or physical evidence (e.g., text messages, social media postings, emails, photos, medical records, etc.) that they wish to be considered by the investigator.
6. Preparation of an investigatory report complete with a summary of interviews, relevant documents, findings, and recommendations for further action. The report must be provided to the parties and advisors, if any, at least 10 days prior to any hearing in the matter for their review and written response should they choose to respond.

Obligations of the College-Institute

Applicable law requires the College-Institute to ensure that the investigatory process be conducted equitably. Safeguards to that end include the following:

1. Throughout the investigatory process, the burden of proof and of gathering evidence sufficient to reach a determination regarding responsibility, if any, for the alleged prohibited conduct, rest on the College-Institute and not on the parties except that the College-Institute may not access, consider, disclose or otherwise use a party's medical records absent the party's voluntary, written consent.
2. The parties will have equal opportunity to present witnesses.
3. The College-Institute will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.
4. Parties whose participation is invited or expected will receive written notice of the date, time, location, participants and purpose of all investigative interviews or other meetings with sufficient time for the party to prepare to participate.
5. The parties will have an equal opportunity to be accompanied by an advisor of their choice, who may be but is not required to be an attorney. The choice should not be a witness. The advisor's role is not to advocate or impede the investigation.
6. Both parties shall have an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations so that each party can meaningfully respond to the evidence prior to the investigation's conclusion.

7. Prior to completion of the investigative report, the College-Institute will send to each party and the party's advisor, if any, the evidence in an electronic format or hard copy to which the parties may respond in writing. The parties will have at least 10 days to respond.

Typical Timeframe: Generally, an investigation and, if applicable, a Grievance Committee proceeding (excluding an appeal of a Grievance Committee's decision) regarding conduct falling under this policy will be completed within 60 days of the complaint. However, each situation will vary depending on its individual circumstances.

During the investigation, the College-Institute will continue to provide any appropriate interim or protective measures.

Disciplinary/Adjudication Procedure

Upon completion of the report, the investigator will deliver the report to the Title IX Coordinator. In the event that the Title IX Coordinator finds that there is probable cause to believe that a violation of this policy has occurred, the Title IX Coordinator will issue a notice of violation in writing to the accused and provide a copy of that notice to the complainant. Any notice of violation will also include a recommendation with regard to disciplinary action. In the event that the Title IX Coordinator does not find that there is probable cause to believe that a violation has occurred, the Title IX Coordinator will notify both the complainant and the accused in writing of that finding.

If either party feels aggrieved by the findings, he or she may challenge those findings through the College- Institute's applicable appeal/grievance procedure. The procedure for challenging those finding through a grievance can be found in the policy titled "Appeal/Grievance Policy – Sexual Misconduct and Interpersonal Violence." (<http://huc.edu/equity-inclusion/what-our-policy>).

Dismissal of a Formal Complaint

If the conduct alleged in the formal complaint would not constitute prohibited conduct even if proved, did not occur in the College-Institute's jurisdiction or in the United States, then the Complaint will be dismissed for purposes of Title IX compliance. However, such dismissal does not preclude action under another College-Institute policy.

The College-Institute may dismiss a formal complaint or any allegation in the Complaint if, at any time during the investigation or hearing, the complainant notifies the Title IX Coordinator in writing that they want to withdraw the complaint or any allegation in the complaint. It may also dismiss a complaint when the accused is no longer enrolled at or employed by the College-Institute or where the College-Institute has been prevented from gathering evidence sufficient to reach a determination. Upon dismissal, a written notice of the dismissal and the reasons for it will be sent to the parties simultaneously.

Possible Discipline/Sanctions

The College-Institute reserves the right to exercise broad discretion in the imposition of corrective actions in connection with this policy. Possible discipline or sanctions for engaging in Prohibited Conduct:

- Oral warning
- Letter of warning or reprimand, and a copy placed in the student's or employee's file
- Probation
- Service to the College
- Counseling/training
- Demotion
- Housing Restrictions
- Forced leave of absence
- Suspension for a defined period of time
- Dismissal or expulsion from the College

Alcohol/Drug Use Amnesty

When reporting instances of Prohibited Conduct, reporters or witnesses who are acting in good faith will not be subject to

alcohol and/or drug use policy violations occurring at or near the time of the alleged incident. This policy is intended to encourage reporting by eliminating students' hesitation to report Prohibited Conduct out of fear that their own conduct may subject them to College-Institute disciplinary action.

"No Contact" Orders and Interim Suspensions

After receiving a report or complaint of Prohibited Conduct, the Title IX Coordinator has discretion to issue an order of "no contact" between the parties at issue and/or order that the accused be suspended on an interim basis, pending further review. Interim suspensions will be reserved for those situations where the Title IX Coordinator reasonably believes that the accused may present a continuing threat to the health and safety of the College-Institute community. Within five (5) days of the Title IX Coordinator issuing a "no contact" order or an interim suspension, any affected party may submit a written request (with evidence, if applicable) to the Title IX Coordinator to review the need for, and terms of, the "no contact" order or interim suspension.

The other affected party or parties will be notified of the request and similarly given five (5) days to respond in writing (with evidence, if applicable) to the Title IX Coordinator. The Title IX Coordinator will then promptly notify all parties regarding a modification, if any, to the "no contact" order or interim suspension.

Students' Rights

All students have the right to:

1. Make a report to local law enforcement and/or state police;
2. Have disclosures of Prohibited Conduct treated seriously;
3. Make a decision about whether or not to disclose a crime or violation and participate in the judicial or conduct process and/or criminal justice process free from pressure by the College-Institute;
4. Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard;
5. Be treated with dignity and to receive from the College-Institute courteous, fair, and respectful health care and counseling services, where available;
6. Be free from any suggestion that the reporting individual is at fault when these crimes and violations are committed, or should have acted in a different manner to avoid such crimes or violations;
7. Describe the incident to as few institution representatives as practicable and not be required to unnecessarily repeat a description of the incident;
8. Be protected from retaliation by the College-Institute, any student, the accused and/or the respondent, and/or their friends, family, and acquaintances within the jurisdiction of the College-Institute;
9. Access to at least one level of appeal of a determination;
10. Be accompanied by an advisor of choice who may assist and advise a reporting individual, grievant, accused, or respondent throughout the investigative and disciplinary process including during all meetings and hearings related to such process; and
11. A complainant whose allegations are found to be both demonstrably false and brought with malicious intent will be subject to disciplinary action which may include, but is not limited to, written warning, demotion, transfer, suspension, dismissal, expulsion or termination.

Campus Climate Assessments

The College-Institute will conduct biennial anonymous campus climate assessments to ascertain general awareness and knowledge of the provisions of its sexual misconduct and interpersonal violence policy, including, but not limited to, the role of the institution's Title IX Coordinator or similar representative, how and where to report sexual misconduct and/or interpersonal violence, the definition of consent, and utilization of the institution's policies and procedures addressing sexual misconduct and/or interpersonal violence. The College-Institute will publish the result of such assessments on its website.

Additional Resources and Services for Victims of Sexual Misconduct and/or Interpersonal Violence:

Cincinnati:

Police Department, District #5, (513) 352-3578 or 911

Women Helping Women Rape Crisis Center, (513) 381-5610
Women Helping Women
215 East 9th Avenue

Cincinnati, OH 45202 (Hamilton)
(513) 872-9259
www.womenhelpingwomen.org

Mental Health Association of Southwestern Ohio Suicide and Domestic Violence Prevention Hotline
(513) 287.8542 or (513) 287.8544

Hamilton County, 2400 Reading Rd, Ste. 412, Cincinnati, OH. 45202, Phone: (513) 721-2910; Fax: (513) 287-8544

Ohio Department of Health
Children and Family Health Services Hotline: (800) 282-3435
Report abuse of persons with Developmental Disorders: (800) 231-5872
Emergency Response Hotline: (888) 411-4142
Help Me Grow Hotline: (800) 755-4769
Ohio AIDS/HIV/STD Hotline (Confidential): (800) 332-2437
Victim of Crimes Compensation (800) 824-8263
Crime Victims Services (800) 582-2877
Ohio Domestic Violence Network (800) 934-9840

ARC Legal Advocacy Program
513-695-1886

YWCA House of Peace
Batavia, OH 45103
County: Clermont
(513) 753-7282

Abuse & Rape Crisis Shelter of Warren County
Lebanon, OH 45036
County: Warren
(513) 695-1185

Los Angeles:

L.A. Police Department (213) 485-2582 or 911

University of Southern California Security, (213) 740-6000

L.A. Rape and Battering Hotline, (310) 392-8381

YWCA Greater Los Angeles Los Angeles, CA 90008 County: Los Angeles
(323) 296-0920

Peace Over Violence Los Angeles, CA 90017 County: Los Angeles
(213) 955-9090

Santa Monica Rape Treatment Center (310) 319-4000

Rape Treatment Center at Santa Monica-UCLA Medical Center Santa Monica, CA 90404
County: Los Angeles
(424) 259-7208

New York City:

Police Department, Sixth Precinct, (212) 741-4811 Rape Crisis Hotline, 1-800/621-4673

MOUNT SINAI BETH ISRAEL Victim Services Program: 317 E. 17th Street, 4th Floor, New York, NY; (212) 420-4516 (24/7)

BELLEVUE HOSPITAL Victim Services Program: (212) 562-4730/3755;

462 First Avenue (at 27th Street), Ground Floor #GA68, New York, NY

Safe Horizon
New York, NY 10007 County: Kings County
(212) 577-7700

Center for Safety and Change,
New City, NY 10956
County: Rockland
(845) 634-3391

Hudson County Rape Crisis Center Jersey City, NJ 07306
(201) 795-8375

Appeal/Grievance Procedure –Sexual Misconduct and Interpersonal Violence

Introduction:

Title IX of the Education Amendments of 1972 prohibits sex discrimination—which includes sexual misconduct—in employment and in educational programs and activities. All public and private schools, school districts, colleges and universities receiving federal funds must comply with Title IX. It is the policy of this College-Institute to prohibit all forms of sex discrimination. For purposes of this policy, sexual discrimination includes, but may not be limited to, sexual harassment, sexual misconduct, sexual violence, relationship or dating violence, domestic violence and stalking (collectively referred to through this policy as “Prohibited Conduct.”) Title IX’s protections extend to administrators, faculty, staff, and students in both the work and academic environments.

When an allegation of Prohibited Conduct is brought to the College-Institute’s attention, a prompt investigation will be performed. Please see the College-Institute’s Sexual Misconduct and Interpersonal Violence Policy and Complaint Procedure for more detailed information related to filing a complaint and a possible resulting investigation. <http://huc.edu/sexual-harassment-sexual-assault-sexual-misconduct-reporting-form>. Upon conclusion of the investigation, a report will be prepared and submitted to the Title IX Coordinator. In the event that the Title IX Coordinator has probable cause to believe that a violation of this policy has occurred, the Title IX Coordinator will issue a written notice of violation to the accused and provide a copy of that notice to the complainant. Any notice of violation will also include a recommendation regarding disciplinary measures. In the event that the Title IX Coordinator does not have probable cause to believe that a violation has occurred, the Title IX Coordinator will notify both the complainant and the accused in writing of that finding.

If either party feels aggrieved by the findings, he or she may challenge those findings through this grievance procedure. If a notice of violation has been issued, and the accused fails to challenge the notice of violation by submitting a written grievance within the requisite time period, the notice of violation will be submitted to the Dean of the pertinent campus for a final decision regarding discipline.

Grievance and Adjudication Procedure:

Step 1: All grievances shall be written and submitted to the Title IX Coordinator within seven (7) days of the date the grievant receives the above-described notice from the Title IX Coordinator. All written grievances shall include the following: (1) the name, addresses, and phone number of the grievant; (2) a detailed description of the circumstances surrounding the grievance; and (3) the specific relief the grievant is requesting through the grievance procedure. The Title IX Coordinator will promptly provide a copy of the grievance to the other involved individual(s), hereafter referred to as the respondent(s). The respondent may submit a written response to the grievance to the Title IX Coordinator within seven (1) days of receipt of the grievance.

If the grievant or respondent believes that the Title IX Coordinator has a conflict of interest or bias, the grievant or respondent shall identify his or her reasons for that belief in writing and submit that writing within three (3) business days of the filing of the grievance to the Chief Financial Officer. If it is determined by the Chief Financial Officer that the Title IX Coordinator has a conflict of interest or bias, the Title IX Coordinator will be recused from the grievance process and a separate trained administrator will perform all duties assigned to the

Title IX Coordinator.

Step 2: After receipt of the grievance, the Title IX Coordinator will contact the grievant and the respondent within five (5) business days to schedule separate pre-hearing meetings. Pre-hearing meetings are not mandatory. These pre-hearing meetings are designed to allow the grievant and/or the respondent to ask questions regarding the grievance and adjudication procedure as well as review any investigatory report. Both the grievant and the respondent are permitted to be accompanied by an advisor during the pre-hearing meeting. The advisor should not be someone who may be considered a witness to the incident at issue.

Step 3: After the pre-hearing meetings (or after the parties decline the pre-hearing meetings), the Title IX Coordinator will submit the grievance and the respondent's response, if any, to a Grievance Committee. The Grievance Committee will consist of three (3) College-Institute faculty members or administrators randomly chosen from a defined pool. If either party is a faculty member or administrator, no faculty member or administrator from that party's same department will be chosen to be on the Grievance Committee. Each of the faculty members in the defined pool receives annual training on issues related to sexual harassment, sexual assault, domestic violence, dating violence, and stalking and on the College-Institute's grievance and adjudication process. The grievant and the respondent will be promptly notified of the Grievance Committee's composition.

If either party believes that a member of the Grievance Committee has a conflict of interest or bias, that party shall identify his or her reasons for that belief in writing and submit that to the Title IX Coordinator within three (3) business days of notification of the Grievance Committee's composition. If the Title IX Coordinator determines that a member(s) of the Grievance Committee has a conflict of interest or bias, that member(s) of the Grievance Committee will be replaced by a different faculty member(s) from the defined pool. That process will continue with the newly identified member(s) until the Grievance Committee is finalized.

Step 4: After the Grievance Committee is finalized, the Title IX Coordinator will notify the grievant and the respondent of the date, time, and location of the grievance hearing. The parties will receive at least seven (7) days' notice of the hearing. Prior to the Grievance Committee hearing, the Grievance Committee will be provided a copy of any investigatory report.

Both the grievant and the respondent are permitted to present relevant witnesses and evidence at the hearing. Each party must identify in writing to the Title IX Coordinator the witnesses and/or evidence he or she intends to present at the hearing no later than three (3) days prior to the hearing. The Title IX Coordinator will promptly provide each party with the other party's list of identified witnesses and evidence.

Step 5: Grievance hearings are closed to the general public and must be live. The investigators shall be present at the Grievance Committee Hearing. Both the grievant and the respondent are permitted to have an advisor present. Opening statements are permitted. Each party's advisor must be permitted to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination must be conducted directly, orally and in real time by the party's advisor and not by the party personally. At the request of either party, the College-Institute will provide for the live hearing to occur with the parties located in separate rooms assisted by technology that allows the Committee and the parties to see and hear simultaneously the person answering questions. If a party does not have an advisor present at the live hearing, the College-Institute must provide, without fee to the party, an advisor to conduct cross-examination on the party's behalf. The Committee has the authority to exclude irrelevant questions. Closing statements are permitted. An audio or audiovisual recording or transcript will be made and will be available to the parties for inspection and review.

Step 6: Within seven (7) days of the conclusion of the grievance hearing, the Grievance Committee will issue a written decision. The Grievance Committee will use a preponderance of the evidence (i.e., "more likely than not") standard to determine whether or not an alleged violation occurred. The written decision will include the identification of the alleged prohibited conduct, a description of the procedural steps followed, findings of fact supporting the decision, conclusions regarding the application of the College-Institute's policies to the facts, a rationale for the result as to each allegation, including a determination regarding responsibility, any discipline imposed, whether remedies designed to restore or preserve equal access to the College-Institute's programs or activities will be provided and the procedures for appeal. If the Grievance Committee is not unanimous in its findings or recommended discipline, its written decision shall record that fact.

The Title IX Coordinator will promptly provide simultaneous written notice to both the grievant and the respondent of the Grievance Committee's decision. The Title IX Coordinator will also notify the parties of their

right to appeal the decision and, if applicable, the sanctions or disciplinary measures to be imposed.

Step 7: After the Title IX Coordinator notifies the parties of the Grievance Committee's decision, either party will have seven (7) days to submit a written appeal of the Grievance Committee's decision to the Dean of the pertinent campus. The possible bases for appeal include: (1) a procedural error that has impacted the outcome of the hearing; (2) new evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter; (3) where a sanction is substantially disproportionate to the Grievance Committee's findings; or (4) where the Title IX Coordinator, investigator(s) or Committee members had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

If either party chooses to appeal, the other party will have seven (7) days to submit a written opposition to the appeal to the Dean of the pertinent campus. Upon receipt of the written opposition or the passing of the timeframe allowed to submit a written opposition, the Dean will promptly issue a written decision affirming the Grievance Committee's decision; reversing the Grievance Committee's decision; or remanding the grievance back to the Grievance Committee to consider additional evidence or remedy a procedural error. If the Dean remands the Grievance Committee's decision, the Dean may order that a new Grievance Committee hear the matter. The Dean's decision will be issued in writing to both parties. Each party will be given a reasonable opportunity to submit a written statement in support of, or challenging, the outcome.

A decision regarding responsibility will be considered final if no party submits a timely appeal of a Grievance Committee's decision or if the Dean affirms or reverses the Grievance Committee's decision. Any sanctions or discipline imposed will be stayed until the resolution of the appeal process.

All of the time frames above may be extended by a showing of good cause. However, the commitment to concluding any investigation and Grievance Committee proceeding within 60 days must be viewed as extremely important. Any request for an extension of time must be submitted to the Title IX Coordinator. All parties involved will be promptly notified if a time extension has been granted.

A student is not required to file a grievance with the College-Institute and, if applicable, may file a complaint with federal or state agencies such as:

- The U.S. Department of Education's Office for Civil Rights ("OCR")
 - Chicago Office (for Cincinnati campus): (312) 886-8434
 - San Francisco Office (for Los Angeles campus): (415) 556-4275
 - New York City Office (for NY campus): (212) 637-6466
 - The Ohio Civil Rights Commission ("OCRC"), Cincinnati Regional Office: (513) 852-3344
- The State of California Department of Fair Employment and Housing ("DEFE"): (800) 884-1684 (toll free for complaints and information)
- The New York City Equal Employment Practices Commission: (212) 240-7902
- The New York State Human Rights Commission on Discrimination Complaints: (212) 306-7450

In the event that the College-Institute finds that any student has been a victim of Prohibited Conduct, the College-Institute will take immediate measures to remediate and/or correct the conduct or circumstances. Any individual who is subjected to such conduct will be notified of the College-Institute's measures to remediate and/or correct such conduct.

The College-Institute prohibits retaliation against anyone who files a grievance or otherwise complains under this section. This prohibition of retaliation similarly extends to anyone who has testified, assisted, or participated in any manner in an investigation, proceeding, or hearing relating to a grievance or complaint under this section. Nothing in this provision prevents corrective action with respect to complaints made with knowing falsity and malice.

All documents, witness statements, evidence, and written submissions associated with a grievance under this section will be confidentially maintained, to the extent permitted by law, in the student's disciplinary record. Any request by a student to review the documents, witness statements, evidence, and written submissions associated with his or her

grievance under this policy should be submitted to the Title IX Coordinator.

The notifications required by this policy will not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C. § 1232g), commonly known as the Family Education Rights and Privacy Act of 1974 (FERPA).