

Chicago State University

Non-Title IX Discrimination Policy & Complaint Resolution Procedures

I. Policy Of Nondiscrimination

Equal employment and equal educational opportunity are fundamental principles at Chicago State University (“CSU” or “University”). The University seeks to insure that no person will encounter discrimination in employment or education on the basis of age, color, disability, sex, national origin, race, religion, sexual orientation, or veteran' s status (“Protected Categories”).

This policy applies to all policies and procedures relating to recruitment, hiring, admission, financial aid, compensation, benefits, termination, and all other terms and conditions of employment and education.

Appropriate disciplinary action may be taken against any employee or student for violating this Nondiscrimination Policy after review and investigation pursuant to the complaint resolution procedures set forth below (the “Procedures”).

The University prohibits Retaliation against any individual that files a Discrimination or Harassment complaint or participates in the investigation or resolution process. Incidents of Retaliation should be reported immediately to the Associate General Counsel for Compliance and Title IX Coordinator.

II. Applicability

This policy applies to faculty, staff, applicants for employment or enrollment, and students in the University and in University-sponsored settings outside the University campus. The University’s policies prohibit unlawful Discrimination, Harassment, and Retaliation whether engaged in by faculty, staff, or students, or, to the extent the University exercises control over the non-affiliated individual, by someone associated with, although not directly employed or enrolled by, the University (e.g., an outside vendor, consultant, volunteer).

Members of the University community are expected to foster an environment that is free from Discrimination and Harassment. Any faculty or staff member or student who has knowledge of any discriminatory, harassing, or retaliatory conduct is encouraged to make a report in accordance with the complaint procedure set forth below.

III. Definitions

- A. **Discrimination:** Treating someone differently because of their membership in a Protected Category (or a perception that someone is a member of a Protected Category) in matters of admissions, employment, services, or any other educational programs or activities of the University. Disparate treatment discrimination occurs when there has been an adverse impact on the individual's work or educational environment, individuals outside of the Protected Category have received more favorable treatment, and there is no legitimate, non-discriminatory reason for the action. Disparate impact discrimination occurs when a University policy, procedure, or rule adversely impacts persons in a Protected Category even though the policy, procedure, or rule is neutral on its face.
- B. **Harassment:** Verbal or physical conduct (including conduct using technology) directed toward an individual because of their membership in a Protected Category (or a perception that someone is a member of a Protected Category) that has the purpose or effect of substantially interfering with the individual's educational or work performance, or creating an intimidating, hostile, or offensive work or academic environment. *Quid pro quo* harassment occurs where submission to or rejection of prohibited conduct is used, explicitly or implicitly, as the basis for decisions adversely affecting an individual's education, employment, or participation in a University program or activity.

In determining whether a hostile environment exists, the University examines the context, nature, scope, frequency, duration, and location of incidents, as well as the relationships of the persons involved. Conduct that does not meet the definition of Harassment may still violate other policies or expectations for appropriate/professional conduct set by the University and, accordingly, may result in discipline as determined appropriate by the University.

Petty slights, annoyances, and isolated incidents (unless extremely serious) generally do not constitute Harassment. To constitute Harassment, the conduct must meet the definition set forth above. Examples of conduct that may rise to the level of Harassment are set forth below, but the list is not exhaustive:

- Verbal conduct such as use of epithets; derogatory remarks; comments or slurs; offensive, lewd, vulgar, or obscene remarks or jokes.
- Visual conduct such as displaying in a public area derogatory, lewd, vulgar, or obscene posters or cartoons.
- Physical conduct such as assault, blocking normal movement, interfering with work, touching, or other unwelcome physical contact.

- C. **Retaliation:** Taking materially adverse action against a person because the person made a good faith report of Discrimination or Harassment or participated in the investigation or adjudication of a report of Discrimination or Harassment.
- D. **Complainant:** The individual reported to be the victim of conduct that could constitute Discrimination, Harassment, or Retaliation in violation of the Nondiscrimination Policy.
- E. **Respondent:** The individual alleged to be the perpetrator of conduct that could constitute Discrimination, Harassment, or Retaliation in violation of the Nondiscrimination Policy.
- F. **Investigator:** A University staff member (or designee) assigned to investigate a complaint of Discrimination, Harassment, or Retaliation pursuant to these Procedures.

IV. Complaints Of Discrimination, Harassment, Or Retaliation

Complaints alleging Discrimination, Harassment, or Retaliation in violation of the Nondiscrimination Policy should be directed to the following office:

Kendra Moore
Associate General Counsel for Compliance & Title IX Coordinator
kmoores60@csu.edu
titleix@csu.edu
(773) 995-3582
Cook ADM, Room 318

The Procedures constitute the University's Section 504 grievance procedures and the University's Age Discrimination Act grievance procedures.

Faculty, staff, and students who have experienced conduct they believe is contrary to the Nondiscrimination Policy have an obligation to take advantage of this complaint procedure. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of Discrimination, Harassment, or Retaliation. While there is no time limit for reporting, the University strongly encourages the prompt reporting of complaints or concerns so that a fair investigation can be conducted, and appropriate action taken in a timely manner.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to discriminatory, harassing, or retaliatory conduct from promptly advising the offender that their behavior is unwelcome and requesting that it stop.

The University will conduct a prompt, fair, and impartial investigation of all complaints of Discrimination, Harassment, and Retaliation. If an individual is found to have violated this Nondiscrimination Policy, the University will take appropriate action to prevent recurrence of the Discrimination and/or Harassment and take steps to correct its discriminatory effects on the Complainant and others, if appropriate. Individuals found responsible will face disciplinary action, up to and including dismissal or termination.

Complaints involving Sexual Harassment as defined by the University's Title IX [Sexual Harassment Policy](#) will be addressed exclusively through that policy and process. This policy addresses all other forms of sex-based discrimination, including sex-based harassment that does not rise to the level of Sexual Harassment as defined in the Title IX Sexual Harassment Policy. Conduct that is raised initially through a formal complaint under the Title IX Sexual Harassment Policy may also be addressed under this policy, in CSU's discretion, when: (i) the conduct at issue, or some part of it, may constitute a violation of this policy irrespective of whether it constitutes Sexual Harassment under the Sexual Harassment Policy; (ii) the formal complaint, or some part of it, has been dismissed under the Sexual Harassment Policy; or (iii) a final determination of a formal complaint has been made under the Sexual Harassment Policy and separate or additional action may be necessary to enforce this policy.

V. Anonymous And Third-Party Reporting

Any individual may make a report of Discrimination, Harassment, or Retaliation. The report may be made anonymously and/or without disclosing the identities of the parties involved. However, the University's ability to respond to anonymous or third-party reports may be limited by the amount of information provided.

VI. Employee Reporting

The University strongly urges the reporting of all incidents of Discrimination, Harassment, and Retaliation. Any faculty or staff member who believes he or she has experienced conduct that is contrary to the University's policy, or who has concerns about such matters, should file a complaint as soon as possible. Reports should be made to the Associate General Counsel for Compliance & Title IX Coordinator and should include all known relevant details of the alleged Discrimination, Harassment, or Retaliation.

All employees who receive a complaint or information about suspected Discrimination, Harassment, or Retaliation, or who otherwise for any reason suspect such conduct has or may be occurring, are required to report such conduct to the Associate General Counsel for Compliance & Title IX Coordinator. Disciplinary measures will be taken against any employee who fails to report Discrimination, Harassment, or Retaliation to the Associate General Counsel for Compliance & Title IX Coordinator or who knowingly allows Discrimination, Harassment, or Retaliation to continue.

VII. Related Policies and Procedures

Conduct that is discriminatory or harassing may also implicate other University policies. The Student Handbooks and Employee Handbook may be relevant to complaints of Discrimination, Harassment, or Retaliation and used by the University to address the underlying allegations of misconduct. Complaints involving conduct that does not fall within the scope of the Nondiscrimination Policy, including conduct that could not constitute Harassment or Discrimination as defined in the policy, may be referred for review and action under the above-referenced policies.

VIII. Informal Resolution

If both the Complainant and Respondent agree, reports of Discrimination, Harassment, or Retaliation may be referred to informal resolution. However, engaging in the informal resolution process is at the discretion of the Title IX Coordinator.

Prior to commencing the informal resolution process, the parties will receive a written notice that:

- Describes the parameters and requirements of the informal resolution process.
- Identifies the individual responsible for conducting the informal resolution.
- Explains the effect of participating in informal resolution and/or reaching a final resolution will have on a party's ability to resume the investigation and adjudication of the allegations at issue in the formal complaint.
- Explains any other consequence resulting from participation in the informal resolution process, including a description of records that will be generated, maintained, and/or shared.

A party may withdraw their consent to participate in informal resolution at any time before a resolution has been finalized.

IX. Complaint Resolution Procedures

- A. When the University receives a report of Harassment, Discrimination, and/or Retaliation, the Associate General Counsel for Compliance & Title IX Coordinator will conduct a preliminary assessment to determine if the conduct, as alleged, falls within the scope of the Nondiscrimination Policy or should be handled under a different policy or procedure. If the complaint falls within the scope of the Nondiscrimination Policy, the Associate General Counsel for Compliance & Title IX Coordinator will assign the complaint to an appropriate Investigator for investigation.

- B. The appropriate Investigator (or designee) will notify the Respondent of the complaint and commence an investigation within seven (7) business days of receiving the complaint. Written notice to the Respondent will include a copy of this policy and sufficient details known at the time so that the Respondent may prepare for an initial interview with the Investigator, to include the identities of the parties involved in the incident (if known), the conduct allegedly constituting Discrimination, Harassment, and/or Retaliation, and the date and location of the alleged incident (if known).
- C. The University will determine the most effective method of investigating alleged violations of its Nondiscrimination Policy. Typically, an investigation will include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or have relevant knowledge. Both the Complainant and Respondent will have an equal opportunity to identify and have considered witnesses and other relevant evidence. The Investigator will use their professional judgment to assess the relevance of the information submitted. The Investigator will share materials submitted by one party with the other party as the Investigator deems appropriate. In some instances, the Investigator may interview the Complainant, Respondent, and witnesses more than once. The Investigator may adapt and modify the investigatory procedure in the Investigator's discretion, based on the nature of the complaint and the conduct at issue.
- D. The investigation is a party's opportunity to present testimonial and other evidence that the party believes is relevant to resolution of the allegations in the complaint. A party that is aware of and has a reasonable opportunity to present evidence and/or identify witnesses during the investigation, and elects not to, will generally be prohibited from introducing any such evidence or witness testimony during the appeal. The Investigator retains discretion to limit the number of witnesses interviewed during the investigation. The Investigator may choose not to interview individuals where the testimony would be unreasonably cumulative, if the individual does not have information relevant to the allegations at issue, or if the individual is offered to render testimony that is categorically inadmissible.
- E. The University's ability to investigate a specific allegation, as well as the extent to which an allegation can be investigated, will be affected by any number of factors, including, the nature of the allegations, the availability of evidence, whether the Complainant is willing to participate in an investigation, the location where the alleged conduct occurred, and the University's access to information relevant to the alleged or suspected violation of the Nondiscrimination Policy.
- F. The investigation will conclude no later than 90 calendar days after the start of the investigation unless good cause exists to extend the period for investigation. Both parties will be provided with periodic updates of the status of the investigation and will be notified if the period for investigation has been extended.

- G. The University will use a preponderance of the evidence standard in determining responsibility for Discrimination, Harassment, or Retaliation.
- H. At the conclusion of the investigation, the Investigator will prepare a preliminary investigation report. The preliminary report will contain a summary of the alleged conduct in violation of policy; summary of the response to the allegations; summary of the scope of the investigation; summary of the relevant exculpatory and inculpatory evidence; and summary of material facts on which the parties agree and disagree. The report will include copies of all relevant evidence received and considered during the investigation. Both parties will be provided with a copy of the preliminary report and have ten (10) business days to respond to it in writing.
- I. If, after receiving the written responses regarding the preliminary investigation report, the Investigator determines that no further inquiry is required, the investigation will be deemed complete and final. If, in the sole discretion of the Investigator, further inquiry is necessary, the Investigator will follow up on the information and ask any clarifying questions of the parties and witnesses before finalizing and completing the investigation. Any additional relevant information received and/or answers to clarifying questions will be included in the final investigation report.
- J. Upon completion of the final investigation report, the Associate General Counsel for Compliance & Title IX Coordinator will appoint an Adjudicator. The parties and the Adjudicator will be provided a copy of the investigation report and a copy of all the relevant evidence received and considered by the Investigator.
- K. The Adjudicator will promptly send written notice to the parties notifying the parties of the Adjudicator's appointment; setting a deadline for the parties to submit any written response to the investigation report; and setting a date and time for each party to meet with the Adjudicator separately. The Adjudicator's meetings with the parties will not be held any earlier than ten (10) days from the date of transmittal of the written notice specified in this paragraph.
- L. After reviewing the parties' written responses, the Adjudicator will meet separately with each party to provide the party with an opportunity to make any oral argument or commentary the party wishes to make and for the Adjudicator to ask questions concerning the party's written response, the investigative report, and/or the evidence collected during the investigation.
- M. After meeting with each party, the Adjudicator will objectively evaluate all relevant evidence, including both inculpatory and exculpatory evidence. The Adjudicator will take care to exclude from consideration any evidence that the Adjudicator determines should be ruled inadmissible based on the objections and arguments raised by the parties in their respective written responses to the investigation report. The Adjudicator will resolve disputed facts using a preponderance of the evidence (that is, "more likely than not") standard and reach a determination

regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the policy as alleged.

- J. Thereafter, the Adjudicator will issue a written decision to both parties that includes a statement of, and rationale for, each allegation that constitutes a separate potential violation of this policy, including a determination regarding responsibility for each separate potential incident. The written decision shall articulate findings of fact, made under a preponderance of the evidence standard, that support the determination. The written decision shall also include notice of the procedures to file an appeal.
- K. When a preponderance of the evidence supports a finding that this policy has been violated, the matter will be referred for appropriate disciplinary and remedial action.
- L. When there is insufficient evidence to find a violation of this policy, the complaint will be closed. Such a finding does not preclude further review or action by other administrative offices if the underlying conduct could constitute a violation of other University policies.

X. Appeals

- A. Either party may appeal the finding on the following grounds:
 - A procedural irregularity affected the outcome.
 - There is new evidence that was not reasonably available during the investigation that could have affected the outcome.
 - The Investigator had a conflict of interest or bias against the appealing party that affected the outcome.
 - The sanction is disproportionate to the violation.
- B. Appeals must be filed in writing with the Associate General Counsel for Compliance & Title IX Coordinator within seven (7) business days of receipt of the written determination. The appeal must include:
 - Name of the Complainant.
 - Name of the Respondent.
 - A detailed statement of the basis for the appeal including the specific facts, circumstances, and argument in support of it.
 - Requested action (if any).

Any appeal that is untimely or does not contain at least one permitted ground for appeal will be rejected.

- C. The Associate General Counsel for Compliance & Title IX Coordinator will appoint an Appeal Officer who will provide written notice to the other party that an appeal has been filed and that the other party may submit a written opposition to the appeal within three (3) business days. The Appeal Officer will also promptly obtain from the Investigator all records from the investigation necessary to resolve the grounds raised in the appeal.
- D. The Appeal Officer will resolve the appeal within seven (7) business days of receiving the appeal and any written opposition to it and may take all actions that the Appeal Officer determines to be in the interest of a fair and just decision. The decision of the Appeal Officer is final.
- E. The Appeal Officer shall issue a written appeal decision that explains the outcome of the appeal and the rationale. The written appeal decision shall be provided to the Complainant, the Respondent, the Adjudicator, and the Investigator.
- F. The determination of a complaint becomes final when the time for appeal has passed with no party filing an appeal or, if any appeal is filed, at the point when the Appeal Officer has resolved all appeals. No further review beyond the appeal is permitted.

XI. Corrective Action

Any individual found to have engaged in Discrimination, Harassment, or Retaliation will be disciplined as appropriate, up to and including dismissal, discharge, or expulsion. The University will also take steps to correct its discriminatory effects on the Complainant and others, if appropriate.

Possible corrective action depends on the severity of the misconduct and may include, but is not limited to, training; referral to counseling; monitoring of the alleged offender; and/or disciplinary action such as warning, reprimand, probation, withholding of promotion or pay increase, reduction of salary or wages, demotion, reassignment, leave of absence or temporary suspension with or without pay, or dismissal, as the University believes appropriate under the circumstances.

XII. Rights of the Parties

During the investigation and resolution of a complaint, the Complainant and Respondent shall have equal rights. They include:

- Receiving copies of all relevant policies which apply to the allegation(s).
- Written explanation of rights and options.

- Written notification of existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available on campus and in the community.
- Equal opportunity to identify and have considered witnesses and other relevant evidence.
- The opportunity to provide written questions to the Investigator to be asked of the other party or witnesses.
- Timely notice of meetings providing sufficient time to prepare for meaningful participation.
- Similar and timely access to relevant information considered by the Investigator.
- Equal opportunity to review any statements or evidence provided by the other party.
- Equal access to review and comment upon any information independently developed by the Investigator.
- Simultaneous notification of the results of all proceedings under these Procedures, any changes to the results, and when such results become final.

XIII. Complainant Rights and Options

In any matter where the complaint involves allegations of sexual assault, domestic violence, dating violence, or stalking, the Complainant shall be provided a written notice of rights and options that includes a description of available options for, and assistance in, changing academic, transportation, and working situations, as well as information about:

- The importance of seeking immediate medical attention for sexual violence.
- Other available health care and counseling services.
- The importance of preserving evidence for proof in the investigation or subsequent proceedings, or for obtaining a protective order.
- How and to whom the alleged offense should be reported.
- Options regarding notifying law enforcement and/or campus authorities, including notification of the Complainant's right to:
 - notify either police (local or campus) or campus authorities

- be assisted by campus authorities in notifying law enforcement if the Complainant so chooses
- decline to notify such authorities
- The rights of Complainant and the institution's responsibilities to notify law enforcement of any orders of protection, "no contact" orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

XIV. Advisors

The Complainant and the Respondent have the same opportunity to be accompanied to any related meeting or proceeding by one advisor for support, guidance, and/or advice, provided that the advisor complies with the guidelines for advisors outlined in these Procedures. The advisor may not be a witness and, in cases involving multiple complainants or respondents, the advisor cannot be another complainant or respondent.

The advisor's role is to provide support, guidance and/or advice only. The advisor may not participate in any manner during any related meeting or proceeding. This advisor may not: (1) address or question the Investigator(s), or other parties or witnesses; (2) present evidence or make arguments; or (3) have any role other than to accompany and communicate with the party requesting support and/or advice. The Complainant or the Respondent may request a break during any meeting and/or proceeding to allow the Complainant or the Respondent to confer with their respective advisor privately.

The University reserves the right to remove or dismiss an advisor who fails to follow the applicable provisions of the Procedures, in which case the party will be allowed to select a different advisor.

The University may consider reasonable requests to reschedule a meeting or proceeding because an advisor cannot be present; however, the University is not required to do so and will not do so if it unreasonably delays the process.

XV. Threat Assessment and Interim Protective Measures

When the Associate General Counsel for Compliance & Title IX Coordinator (or designee) becomes aware of a potential violation of the Nondiscrimination Policy, they will, in consultation with other administrators, as appropriate, conduct an initial threat assessment to determine whether there is reasonable cause to believe that the Respondent poses a continuing, significant threat of harm to the health, safety, and welfare of others or to the campus community, and whether interim measures are necessary to alleviate or mitigate that risk.

If the University determines that immediate action may be necessary to protect the rights, interests, or safety of the Complainant, Respondent, or the University community, it will implement protective measures, which may include course-related adjustments, modifications to work or class schedules, changes in work locations, leaves of absence,

directives to the parties regarding personal contact, and, in severe cases, the immediate suspension of the Respondent pending the completion of a formal investigation. These remedial and protective actions may be coordinated with any similar actions independently provided by the University upon the request of the Complainant.

The University will maintain the confidentiality of Interim Protective Measures provided to either a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair the University's ability to provide the measures in question.

XVI. Conflicts Of Interest and Bias

All University officials participating in this process will be free of any material conflicts of interest or material bias. Any party who believes an official has a material conflict of interest or material bias must raise the concern promptly so that the University may evaluate the concern and find a substitute, if appropriate. The failure of a party to timely raise a concern of a conflict of interest or bias may result in a waiver of the issue for purposes of any appeal.

XVII. Bad Faith Complaints

If there is evidence that a complaint was submitted without a reasonable basis in fact and honest belief, the Investigator shall include that evidence in the investigation report. Such conduct could constitute a violation of the University's Community Standards and will be reported to the relevant supervisor for appropriate action, including possible disciplinary action.

XVIII. Duty To Cooperate

All parties and witnesses have an obligation to cooperate and provide truthful information during investigations of alleged violations of the University's Nondiscrimination Policy.

A Complainant's failure to participate (e.g., by failing to furnish information requested by the Investigator or to be available for interview by the Investigator) may affect the University's ability to investigate the matter and may result in the complaint being dismissed.

XIX. Confidentiality

The confidentiality and privacy of parties and witnesses to an investigation will be maintained to the greatest extent possible. The University will keep identifying information about Complainants, Respondents, and witnesses as confidential as possible, and such information will generally only be shared on a need-to-know basis with individuals who have a role in the investigation or resolution of a complaint or who are legally required to receive such information.

All participants (including Complainant(s), Respondent(s), witnesses, support persons, and administrators) involved in proceedings under these Procedures, or who otherwise gain knowledge about the matter subject to the proceedings, shall treat all information acquired, whether written or oral, as confidential, provided however, that the parties to a proceeding may share such information with their personal advisors, advocates, and representatives and as necessary to respond to the allegations.

The University requests that the parties, witnesses, and other University community members with knowledge of the matter refrain from unnecessary disclosures of investigatory details and/or other complaint related information. Restraint of disclosure regarding details of the University's investigation provides the best opportunity for the University to obtain accurate, unbiased, uninfluenced recollections of events and/or otherwise known information from parties, witnesses, and others with knowledge of the matter. Disclosure of complaint and/or investigation information for the purpose of influencing and/or obstructing the University's investigation is prohibited.

In the event a Complainant requests confidentiality or asks that a complaint not be investigated, the University will take all reasonable steps to investigate and respond to the complaint consistent with the request for confidentiality or request not to pursue an investigation. If a Complainant insists that his or her name not be disclosed to the alleged perpetrator, the University's ability to respond may be limited. The University reserves the right to initiate and proceed with an investigation despite a Complainant's request for confidentiality in limited circumstances involving serious or repeated conduct or where the alleged perpetrator may pose a continuing threat to the University Community.

The University must balance the victim's desire for confidentiality against the overall campus safety. Factors to consider include: (a) was a weapon involved in the incident; (b) is the accused a repeat offender; (c) does the incident create a risk of occurring again; (d) are there other sources of evidence that could be used to identify the accused (i.e., surveillance cameras); and (e) will the University be able to eliminate the hostile environment without disclosing the identity of the victim. If the University is unable to honor the victim's request for confidentiality, the University will notify the victim before the victim's identity is disclosed to the accused.

XX. Notification To Outside Entities

Notwithstanding the confidentiality provisions set forth above, the University may have an ethical obligation to notify outside entities of a report of Discrimination, Harassment, or Retaliation when it determines that the health, safety, or welfare of individuals may be at risk.

XXI. Free Expression and Academic Freedom

The University values freedom of expression, academic freedom, and the open exchange of ideas; the expression of controversial ideas and differing views is vital to college discourse. The University is equally committed to creating and maintaining a safe, healthy, and harassment-free environment for all members of its community and firmly believes that these two legitimate interests can coexist. Discrimination, Harassment, and Retaliation against members of the University community are not protected expression or the proper exercise of academic freedom. The University will consider its commitment to free expression and academic freedom in the investigation of reports of Discrimination, Harassment, and Retaliation that involve an individual's statements or speech.

XXII. Legal Protections and External Remedies

Discrimination and Harassment are not only prohibited by the University, but are also prohibited by state, federal, and local law. Aside from the internal complaint process at the University, students and employees may also choose to pursue administrative remedies with the following government entities. The University encourages employees to use the University's internal reporting process as a starting point so that the University can promptly address conduct.

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

Chicago Office

Office for Civil Rights

U.S. Department of Education

John C. Kluczynski Federal Building

230 S. Dearborn Street, 37th Floor

Chicago, IL 60604

Telephone: 312-730-1560

FAX: 312-730-1576; 800-877-8339 (TTY)

Email: OCR.Chicago@ed.gov

U.S. Equal Employment Opportunity Commission (EEOC)

JCK Federal Building

230 S Dearborn Street (Suite 1866)

Chicago, IL 60604

Telephone: 312-872-9777

Fax: 312-588-1260; 800-669-6820 (TTY)

Illinois Department of Human Rights:

555 West Monroe Street, Suite 700

Chicago, IL 60661

Telephone: (312) 814-6200

Fax: (312) 814-6251; (866) 740-3953 (TTY)

XXIII. Training

These Procedures will be implemented by officials who receive annual training on issues related to Discrimination and Harassment, including sexual violence, domestic violence, dating violence, and stalking, and on methods and processes for conducting complaint investigations and proceedings in a manner that protects the safety of victims and promotes accountability.

XXIV. Recordkeeping

The Associate General Counsel for Compliance & Title IX Coordinator is responsible for maintaining documentation regarding all relevant complaints filed under the Nondiscrimination Policy, including documentation of all investigations, resolutions (informal or formal), and appeals conducted under these Procedures.

Records shall be retained for a minimum of seven years and shall be stored in a manner reasonably designed to maintain their confidentiality. However, nothing in this policy shall limit the University's right to use the complaint files, or portions thereof, in connection with the University's business, the investigation or resolution of other complaints, during litigation, or in connection with any investigation by any government agency.