

Sexual Misconduct Policy
for
Bellarmino University
(“University”)

1. Introduction

The University prohibits all forms of sexual discrimination, including sexual misconduct. The University is committed to addressing sexual misconduct in a manner consistent with applicable law. A notice of the University’s policy of nondiscrimination shall be widely disseminated on the University’s campus to students, employees, applicants for admission and applicants for employment. The notice shall be included in any bulletins, announcements, publications, catalogs, application forms, or recruitment materials distributed to the University community, including all applicants for admission and employment, students, employees, and sources of referral of applicants for admission and employment. The notice shall specifically state that (a) the University does not discriminate on the basis of sex in its education programs and activities, (b) the University is required by Title IX not to discriminate in such a manner, and (c) questions concerning Title IX may be referred to the University’s Title IX Coordinator or to the Office of Civil Rights at the United States Department of Education. The notice of non-discrimination shall state the office address, telephone number and email address of the University’s Title IX Coordinator, or its lead Title IX Coordinator if there is more than one.

Specifically, it is the policy of the University that designated staff and faculty members take immediate and appropriate steps to investigate or otherwise determine what happened when the University knows or reasonably should know of possible sexual misconduct. When sexual misconduct is determined to have occurred, the University shall take prompt and effective steps reasonably calculated to end the sexual misconduct, eliminate the hostile environment, prevent its recurrence, and, as appropriate, remedy its effects. All complaints shall be processed in accordance with the procedures established in this policy.

It is also the policy of the University to protect any student or employee filing a complaint alleging sexual misconduct and to ensure the complainant’s safety as necessary, including taking interim steps to protect the parties prior to the final outcome of any inquiry. It is the University’s duty under Title IX to resolve complaints promptly and equitably and to provide a safe and nondiscriminatory environment, free from sexual harassment and sexual misconduct. This duty also applies to complaints involving parties of the same sex, and it requires the University to use the same procedures and standards used in all complaints involving sexual misconduct.

Inappropriate conduct by University personnel toward students, faculty and staff members is prohibited, and University policies shall identify procedures for identifying and responding to inappropriate conduct by University personnel.

2. Scope of Policy

a. Persons, Conduct, Locations, Programs, Activities and Relationships Covered - All of the University's students, employees, and campus visitors are covered by this policy, regardless of sexual orientation or gender identity. This policy applies on all property owned by the University, on all property at which the University holds educational programs or activities, and on all airplanes, buses, or other vehicles used to transport the University's students, faculty and staff, and this policy applies to all of the University's educational programs and other activities. This policy, the name and contact information of the Title IX Coordinator, and other resources related to Title IX compliance and gender equity shall be maintained on a page on the University's website, and a link to this page shall be prominently displayed on the University's homepage. In the event of an alleged off-campus sexual misconduct incident, the University shall protect the student, faculty or staff member in the same manner it would had the sexual misconduct occurred on campus. Further, the University shall handle off-campus sexual misconduct incidents as it would handle other off-campus incidents of misconduct or violence and consistent with any applicable law.

b. Overview of Confidentiality Policy - The University's confidentiality policy is set forth in Section 6.

3. Options for Assistance Following an Incident of Sexual Misconduct

The University shall take prompt steps to protect the complainant once the University has notice of sexual misconduct. The University shall take interim measures, including academic accommodations, to protect the complainant and witnesses as necessary while any criminal or campus inquiry is underway and before the final outcome of any inquiry. University officials should be mindful that sexual misconduct may result in delayed decision-making by a complainant who has experienced sexual misconduct. In anticipation of the need for support services from other agencies in the community, the University shall enter memoranda of understanding with other agencies as may be necessary to meet the University's obligation under Title IX. The University shall enter a memorandum of understanding with local victim services provider if the University does not offer services required by Title IX. All such memoranda shall comply with all FERPA requirements.

a. Immediate Assistance - In the event of a sexual assault, various resources are available to students and employees. Updated names and contact information can be found on the university's website at: <http://www.bellarmine.edu/hr/title-ix/>.

i. Trained on- and off- campus advocates and counselors who can provide an immediate confidential response in a crisis situation:

On-Campus Name and Contact Information: Gary Petiprin,
Director of the Counseling Center
Allen 403
502.272.8480

On-Campus Name and Contact Information: Melissa Gibson, Counseling Center
Allen 403
502.272.8480

On-Campus Name and Contact Information: Alice Kimble, Director of Health Services
Newman Hall
502.272.8313

Off-Campus Name and Contact Information: The Center for Women and Families
927 S 2nd Street
Louisville, KY 40201
1.844.237.2331 or 502.581.7200

Off-Campus for Staff/Employees
Name and Contact Information: Wayne Corporation
Medical Arts Building
1169 Eastern Parkway
Suite 1166
Louisville, KY 40217
502.451.8262

ii. Emergency phone numbers for on- and off- campus safety, law enforcement and other first responders, including the Title IX Coordinator:

Office of Public Safety:	502-272-7777
Local Police:	911 or 502-574-7636
Ambulance:	911 or 502-272-7777
Title IX Coordinator:	502-272-8236

iii. Advocates who can accompany a victim to the hospital or other health care provider:

Name and Contact Information: Clare Dever
2001 Newburg Road
Louisville, KY 40205
502-272-8326

Name and Contact Information: Elizabeth Cassady
2001 Newburg Road
Louisville, KY 40205
502-272-7150

iv. The Bellarmine sexual misconduct response team can provide the resources and support described in the policy and support and can be accessed by:

1. Contacting the Office of Public Safety for on-call crisis response team at 502-272-7777.
2. Residence Life Coordinator on-call may also be reached at 502-523-2697.

v. Health care services for students are available as follows:
On-Campus: Bellarmine University Health Services

Newman Hall
502-272-8313

On-Campus: Bellarmine University Counseling Center
Allen Hall 403
502-272-8480

Off-Campus: University of Louisville Hospital
530 S. Jackson Street
Louisville, KY 40202
502-562-3000

Health care services for employees are available as follows:
University of Louisville Hospital
530 S. Jackson Street
Louisville, KY 40202
502-562-3000

vi. A Sexual Assault Nurse Examiner (SANE) can be found or a rape kit can be obtained at:

University of Louisville Hospital
530 S. Jackson Street
Louisville, KY 40202
502-562-3000

Any victim of sexual misconduct should be aware of the options to seek treatment for injuries, preventative treatment for sexually transmitted diseases, and other services. Complainants are encouraged to discuss with healthcare providers, campus officials, and/or first responders the option of seeking medical treatment in order to preserve evidence which may be necessary to the proof of criminal domestic violence, dating violence, sexual assault, or stalking, or in obtaining a protective order.

Alleged offenses may be simultaneously reported to the law enforcement agencies or to university officials designated in Section 6, and complainants may (a) notify law enforcement authorities, (b) be assisted by campus authorities in notifying law enforcement authorities if the complainant chooses, or (c) decline to notify such authorities. Complainants may also be able to obtain orders of protection, no contact orders, restraining orders, or similar lawful orders issued by an appropriate court.

University officials should be mindful of the University's obligation to provide interim measures to protect the complainant in the educational setting. The University must consider a number of factors in determining what interim measures to take, including, (a) the specific need expressed by the complainant, (b) the age of the parties involved, (c) the severity or pervasiveness of the allegations, (d) any continuing effects on the complainant, (e) whether the complainant and the respondent share the same residence hall, class, transportation or job location, and (f) whether other judicial or code of conduct measures have been taken to protect the complainant. The

University shall minimize the burden of any interim measures on the complainant. The University will provide counseling services without charge to the complainant if the University determines that counseling is necessary as a part of its Title IX obligation to protect the complainant while the inquiry is ongoing. Non-professional counselors or advocates shall consult with complainants regarding what information needs to be withheld to protect each person's identity. The University shall notify the complainant of complainant's options to avoid contact with the respondent and allow the complainant to change academic and extracurricular activities or complainant's living, transportation, dining, and working situation as appropriate. The University shall ensure that the complainant is aware of (a) complainant's Title IX rights, (b) any available resources, such as victim advocacy, housing assistance, academic support, counseling, disability services, health and mental health services, and legal assistance, and (c) the right to report a crime to campus or local law enforcement. The University shall not dissuade a complainant from filing a criminal complaint either during or after the University's internal Title IX inquiry.

b. Ongoing Assistance - Updated names and contact information can be found on the university's website at: <http://www.bellarmine.edu/hr/title-ix/>.

i. Counseling, Advocacy and Support On and Off Campus

1. Counseling and support services for victims of sexual misconduct, whether or not a complainant chooses to make an official report or participate in the University's disciplinary process or criminal process, include:

Name and Contact Information: Bellarmine University Counseling Center
Allen Hall 403
502.272.8480

Name and Contact Information: The Center for Women and Families
927 S 2nd Street
Louisville, KY 40201
1.844.237. 2331 or 502.581.7200

2. Confidential counseling, advocacy, health, mental health, or sexual misconduct related sources, can be found both on and off campus as follows:

On Campus: Bellarmine University Counseling Center
Allen Hall 403
502.272.8480

On Campus: Bellarmine University Health Services
Newman Hall
502.272.8313

Off Campus: The Center for Women and Families
927 S 2nd Street
Louisville, KY 40201
1 .844.237. 2331 or 502.581.7200

Off-Campus for Staff/Employees
Name and Contact Information: Wayne Corporation
Medical Arts Building

1169 Eastern Parkway
Suite 1166
Louisville, KY 40217
502.451.8262

3. Ongoing support during the University's disciplinary process or the criminal process can be found as follows:

Name and Contact Information: Clare Dever, Director of Campus Recreation
SuRF Center
502.272.8326

Name and Contact Information: Elizabeth Cassady
Assistant Dean of Students
Horrigan 225K
502.272.7150

ii. Academic Accommodation and Interim Measures

1. The University can provide immediate steps to ensure the safety and well-being of the complainant, such as the ability to relocate immediately to another campus-owned residence hall, the issuance of no contact orders, and providing access to emergency medical and mental health services.

2. The University may be able to provide additional interim measures for complainants while an inquiry is pending, such as no contact orders and changing the respondent's living arrangements or course schedule, change on-campus work schedules, alter academic schedules, withdraw from/retake a class without penalty, and access academic support (e.g. tutoring).

4. Title IX Coordinator

The Title IX Coordinator shall help the University comply with Title IX and promote gender equity in education. The President shall designate at least one employee to coordinate the University's efforts to comply with and carry out responsibilities under Title IX. The position must not be left vacant; the University must have at least one person designated and actually serving as the Title IX Coordinator at all times. The name and current contact information of the Title IX Coordinator can be found on the University's website at: <http://www.bellarmino.edu/hr/title-ix/>. The University shall notify all students and employees of the name or title and contact information for the Title IX Coordinator. The President shall give the Title IX Coordinator the training, authority, and visibility to fulfill the required duties set forth in this section and elsewhere in this policy in sections, 1, 3, 4, 6, 7, 9 and 10. The Title IX Coordinator shall have knowledge of Title IX requirements, of the University's policies and procedures on sex discrimination and of all complaints raising Title IX issues throughout the University. The University shall appropriately train the Title IX Coordinator in all areas over which the Title IX Coordinator has responsibility and ensure that the Title IX Coordinator

possesses comprehensive knowledge in all areas over which they have responsibility in order to effectively carry out those responsibilities. The Title IX Coordinator shall be informed of all reports and complaints raising Title IX issues, even if the report or complaint was initially filed with another individual or office or if the inquiry is to be conducted by another individual or office. All university officials are prohibited from interfering with the Title IX coordinator's participation in complaint inquiries and monitoring of the university's efforts to comply with and carry out its responsibilities under Title IX. The Title IX Coordinator shall be available to meet with students, faculty and staff as needed. The Title IX Coordinator shall have no other job responsibilities which create a conflict of interest with the responsibilities associated with being the Title IX Coordinator. The Title IX Coordinator shall review all processes used to resolve complaints of sexual misconduct to ensure that they (a) comply with requirements for prompt and equitable resolution of these complaints, (b) allow for appropriate interim measures to be taken to protect the complainant during the process, and (c) provide for remedies to the complainant and University community where appropriate. The Title IX Coordinator shall be knowledgeable about other applicable federal and state laws, regulations, and policies that overlap with Title IX. The University shall provide training for the Title IX Coordinator that explains the different facets of Title IX, including regulatory provisions, applicable OCR guidance, and the university's Title IX policies and grievance procedures. The Title IX Coordinator shall be involved in the drafting and revision of such processes and policies to help ensure that they comply with the requirements of Title IX. The University shall provide the Title IX Coordinator with access to information regarding enrollment in particular subject areas, participation in athletics, administration of university discipline, and incidents of sex-based harassment to allow the Title IX Coordinator to identify and proactively address issues related to possible sex discrimination as they arise. The Title IX Coordinator shall also review the University's disciplinary policy to ensure it does not have a chilling effect on student's reporting of sexual misconduct offenses or participating as witnesses.

5. Definitions

As used in this policy, the phrases and words listed shall have the meanings set forth below:

Consent - Verbal statements or non-verbal actions which a reasonable person would understand to mean a voluntary agreement to engage in sexual activity. Someone who is incapacitated cannot consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another. Consent can be withdrawn at any time. Coercion, force, or threat of either invalidates consent.

Counseling employees - Pastoral and professional counselors who are licensed by the state in which they practice and employed by the University and other non-licensed employees working under the direct supervision and control of the licensed employees such that non-licensed employees are covered by the licensed employees' statutory privilege.

Dating violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship. "Dating violence" includes, but is not limited

to, sexual or physical abuse or the threat of such abuse, but it does not include acts covered under the definition of domestic violence.

Domestic violence - A felony or misdemeanor crime of violence committed by: (a) a current or former spouse or intimate partner of the complainant, (b) a person with whom the complainant shares a child in common, (c) a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner, (d) a person similarly situated to a spouse of the complainant under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or (e) any other person against an adult or youth complainant 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.

Educational setting - All of the University's academic programs and other activities of whatever nature on campus and at every other location where the University conducts authorized programs or activities.

Incapacitation - Any situation in which a person is incapable of giving consent due to the student's age, state of consciousness, use of drugs or alcohol, or an intellectual or other disability.

Intimidation - The intentional act of coercing or frightening someone to engage or not engage in conduct of a sexual nature against that person's will.

Hostile environment - Activity or conduct involving sexual harassment that is sufficiently serious that it interferes with or limits a student's ability to participate in or benefit from the University's program.

Non-consensual sexual contact - Any physical touching of a sexual nature which is not preceded by consent or which continues after a previous consent is withdrawn.

Non-consensual sexual intercourse - Any sexual intercourse which is not preceded by consent or which continues after a previous consent is withdrawn. "Sexual intercourse" includes vaginal or anal penetration by a penis, object, tongue or finger and oral copulation.

Responsible employees - The President, Vice Presidents and Deans of the University, the Title IX Coordinator, full-time faculty members, Residence Life student staff and their supervisors, Intercollegiate Varsity Full Time Coaching Staff and their supervisors, Full Time Student Affairs Staff and University security officers are responsible employees.

Retaliation - The act of seeking revenge upon another person.

Sexual assault - An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting program.

Sexual exploitation - The abuse of a position of vulnerability, differential power, or trust for sexual purposes.

Sexual harassment - Unwelcome conduct of a sexual nature.

Sexual misconduct - Any act of sexual harassment, sexual misconduct, sexual assault, non-consensual sexual contact, non-consensual sexual intercourse, sexual exploitation, stalking, intimidation, dating violence, or domestic violence, or any act that creates a hostile environment or any act of retaliation against a complainant or anyone involved in a grievance procedure under this policy.

Sexual violence - Physical sexual acts perpetrated against a person's will or with a person who suffers from incapacitation. "Sexual violence" also means same-sex conduct that violates the University's prohibition on sexual violence, including, but not limited to, the following examples: sexual harassment, non-consensual sexual contact (or attempts to commit same), non-consensual sexual intercourse (or attempts to commit same), incapacitation, sexual exploitation, stalking,

dating violence, domestic violence, consent, force, and/ or retaliation in connection with any of these offenses.

Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (a) fear for the person's safety or the safety of others, or (b) suffer substantial emotional distress. As used in this definition, "course of conduct" means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils threatens or communicates to or about a person, or interferes with a person's property; "substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling; and "reasonable person" means a person under similar circumstances and with similar identities to the complainant .

Title IX Coordinator - The person designated as such by the University's president or the person temporarily designated by the Title IX Coordinator to serve in that capacity during the Title IX Coordinator's incapacity or absence from the University's campus.

6. Reporting Policies and Protocols

If a student assault occurs, it should be reported to the Office of Public Safety, the Dean of Students, Residence Life, Health Services, or the Counseling Center. If a faculty or staff member assault occurs, it should be reported to the Office of Public Safety or Human Resources. Privacy will be maintained unless another student is involved or a potential risk of harm to self or others exists; reports to Health Services or the Counseling Center will be kept confidential, to the extent possible in accordance with the statutory obligation of the licensed professionals practicing there. Information will be shared only with relevant medical and/or therapeutic personnel until such time that a decision is made or temporary, indirect, or direct action taken. Assaults that occur by an assailant not affiliated with the University and/or off-campus should be reported to local police (911). If law enforcement officials are notified first, it is still recommended to contact a campus resource person so that appropriate measures can be taken and support provided. When an alleged sexual assault is reported, campus resource persons will notify the reporting party in writing of the range of resources and alternatives available to him/her both on campus and in the Louisville community. This includes those staff members who maintain confidentiality (health services clinicians, Professional Counselors and Ordained Pastoral staff serving in the capacity of pastoral counseling). (See Sexual Misconduct and Advocacy Resources handout located at: <http://www.bellarmino.edu/hr/title-ix/>). The discussion should include encouraging the reporting party to report the incident to law enforcement authorities. The University can help arrange a meeting with law enforcement authorities and will accompany and support the alleged victim during the meetings. In instances where reports of sexual discrimination or misconduct are found to be falsely made, the reporting party may be charged with a violation of the Student Code of Conduct, specifically, providing false information to University officials.

The University encourages victims of sexual misconduct to talk to somebody about what happened so complainants can get the support they need and so that the University can respond appropriately. Different employees on campus have different abilities to maintain a complainant's confidentiality:

- Some are required to maintain near complete confidentiality; talking to them is sometimes called a “privileged communication.” This would include the counseling center staff members, health services staff members, and clergy as they act in that specific capacity.
- Other employees may talk to a complainant in confidence, and generally only report to the University that an incident occurred without revealing any personally identifying information. Disclosures to these employees will not trigger a University inquiry into an incident against the complainant’s wishes.
- Thirdly, some employees are required to report all of the details of an incident (including the identities of both the complainant and the respondent) to the Title IX Coordinator. A report to these employees (called “responsible employees”) constitutes a report to the University - and generally obligates the University to investigate the incident and take appropriate steps to address the situation.

This policy is intended to make employees, students and their parents, if appropriate, aware of the various reporting and confidential policies available to them - so they can make informed choices about where to seek assistance should they become a victim of sexual misconduct and so they will know how to report any problems relating to retaliation which may subsequently arise. The University encourages complainants to talk to someone identified in one or more of these groups.

a. Reporting Required - All responsible employees must be aware of their own reporting responsibilities and the importance of informing complainants of (a) the reporting requirements of responsible employees, (b) complainants’ option to request confidentiality and available confidential advocacy, counseling, or other support service, and (c) complainants’ right to file a Title IX complaint with the University and to report a crime to campus or local law enforcement. All responsible employees shall report incidents of sexual misconduct to the Title IX Coordinator, subject to the exemption for the University’s counseling employees. All other employees shall respond to reports of sexual misconduct by notifying a responsible employee of the information pertaining to the incident of sexual misconduct. The University shall take the following steps to ensure that a complainant understands an employee’s reporting obligation before the complainant reveals any information to that employee:

b. Responsible Employees - Responsible employees shall report to the Title IX Coordinator all relevant details about the alleged sexual misconduct that the student or other person has shared and that the University will need to determine what occurred and to resolve the situation. Before a complainant reveals information that the complainant wishes to keep confidential, a responsible employee, including a Residence Life Student Staff Member, should make effort to ensure that the complainant understands: (a) the responsible employee's obligation to report the names of the respondent and complainant involved in the alleged sexual misconduct, as well as relevant facts regarding the alleged incident to the Title IX Coordinator or other appropriate University officials, (b) the complainant's option to request that the University maintain the complainant’s confidentiality which the University will consider, and (c) the complainant's ability to share the information confidentially with counseling, advocacy, health, mental health, or sexual-assault-related services. Residence Life student staff and all responsible employees shall report the names of the respondent (if known), the student, faculty or staff member who experienced the alleged sexual misconduct, other students, faculty or staff involved in the alleged sexual misconduct, as well as relevant facts, including the date, time and location to the Title IX Coordinator. A responsible employee, including a Residence Life student staff member,

prior to providing information about the incident to the Title IX Coordinator, shall consult with the student, faculty or staff member about how to protect his or her safety and the details of what will be shared with the Title IX Coordinator. Responsible employees do not need to determine whether the alleged sexual harassment or sexual misconduct actually occurred or that a hostile environment has been created before reporting an incident to the Title IX Coordinator.

c. Requests for Confidentiality - Upon receipt of a complaint of sexual misconduct, the University must act immediately to protect the complainant while keeping the identity of the complainant confidential. The Title IX Coordinator and other appropriate University personnel shall determine, consistent with state and local law, whether appropriate law enforcement or other authorities should be notified. The Title IX Coordinator or his/her designee shall evaluate requests for confidentiality and shall determine when such requests shall be honored. The Title IX Coordinator shall be consulted in evaluating requests for confidentiality. The Title IX Coordinator or his/her designee shall make every effort to respect requests for confidentiality. In considering a request for confidentiality that would preclude a meaningful inquiry or potential discipline of the respondent, the Title IX Coordinator or his/her designee shall consider an evaluation of circumstances that suggest there is an increased risk of the respondent committing additional acts of sexual misconduct or other violence, such as: (a) whether there have been other sexual misconduct complaints about the same respondent, (b) whether the respondent has a history of arrests or records from a prior university indicated a history of violence, (c) whether the respondent threatened further sexual misconduct or other violence against the student or others, (d) whether the sexual misconduct was committed by multiple respondents, (e) whether the report reveals a pattern of perpetration at a given location or by a particular group, (f) whether the violence was perpetrated with a weapon, (g) the age of the person subjected to sexual misconduct, and (h) whether the University possesses other means to obtain relevant evidence. The Title IX Coordinator and his/her designee shall evaluate confidentiality requests in the context of the University's responsibility to provide a safe and nondiscriminatory environment for all students, faculty and staff members. The University shall inform the complainant that the complainant's request that the complainant's name not be released to the respondent or asks that the University not investigate or seek action against the respondent may limit the University's ability to fully respond to the incident, including pursuing disciplinary action against the respondent. A responsible employee, including a Residence Life student staff member, shall explain to the complainant that reporting the complainant's information to the Title IX Coordinator or any other university official does not necessarily mean that a formal complaint or inquiry under the University's Title IX grievance procedure must be initiated if the student requests confidentiality. All information reported in connection with an alleged sexual misconduct incident shall be maintained in a secure manner. All University employees shall only disclose information regarding alleged incidents of sexual misconduct to individuals who are responsible for handling the University's response. All University employees shall notify complainants of the information that will be disclosed, to whom it will be disclosed and why the disclosure is being made. In the event the complainant requests that the University inform the respondent that the complainant asked the University not to investigate or seek discipline, the University shall honor this request and inform the respondent that the University, not the complainant, made the decision to go forward. In the event the University determines that it can respect the request for confidentiality, the University shall take all reasonable steps to respond to the complaint consistent with the request and to determine what interim measures are appropriate or necessary. In the event the University

determines it must disclose the complainant's identity to a respondent, the University shall inform the complainant prior to making the disclosure.

d. Reporting Options – Students and employees may use any combination of the following options to report sexual misconduct:

1. Criminal Complaint - Criminal complaints are filed with local law enforcement officials and the University is not involved in that process. Criminal complaints can be filed with the following agencies:

Agency & Contact Information: Louisville Metro Police Department 5th
Division
2301 Douglass Boulevard
Louisville, KY 40205
502.574.7636

Agency & Contact Information: Louisville Metro Police Department
Headquarters
633 West Jefferson Street
Louisville, KY 40202
502.574.7111

2. Institutional Complaint. Institutional complaints are filed with the University, and upon receipt of the complaint, the University will initiate an inquiry by the University in accordance with this policy. Institutional complaints may be filed with the Title IX Coordinator. The Title IX Coordinator's name and contact information are:

Lynn Bynum
Centro, Horrigan Hall 202B
502.272.8236

Institutional complaints can also be filed with the following offices:

Office & Contact Information: Dean of Students Office
Centro, Horrigan Hall 225K
502.272.8150

Office & Contact Information: Office of Public Safety
Centro, Treece Hall 054
502.272.7777

3. Report to Responsible Employee - Reports made to responsible employees, including Residence Life student staff members are required by federal law to be relayed to the University's Title IX Coordinator and will initiate an inquiry by the University in accordance with this policy. Responsible employees are identified in Section 5. The Title IX Coordinator is a responsible employee. You can report sexual misconduct to any responsible employee.

4. Privileged and Confidential Reporting - Either as an alternative to the reporting options listed above or in lieu of reporting sexual misconduct to the individuals or offices listed above, complainants may make privileged and confidential reports of sexual misconduct to certain health or mental health providers or to certain pastoral counselors. While criminal complaints, institutional complaints, and reports to responsible employees will result in the initiation of an inquiry, reports to health or mental health providers or to certain pastoral counselors are privileged and will remain confidential so long as the student filing the report does not represent a threat to his or her self or to others. Privileged and confidential reports may be made to:

On Campus Health Provider and
Contact Information:

Office of Health Services
Newman Hall 121
502-272-8131

Off Campus Health Provider and
Contact Information:

University of Louisville Hospital
530 S. Jackson Street
Louisville, KY 40202
502-562-3000

On Campus Mental Student Health Care
Provider and Contact Information:

Bellarmino University Counseling Center
Allen Hall 403
502.272.8480

Off Campus Mental Health Care Provider
and Contact Information:

University of Louisville Hospital
530 S. Jackson Street
Louisville, KY 40202
502-562-3000

On Campus Pastoral Counselor
and Contact Information:

Office of Campus Ministry
Father John Pozhathuparambil
Centro- Horrigan Hall 016
502-272-7051

Off Campus Pastoral Counselor
and Contact Information

Louisville Seminary Counseling Center
1044 Alta Vista Road
Louisville, KY 40205
502-895-3411

Off-Campus for Staff/Employees
Name and Contact Information:

Wayne Corporation
Medical Arts Building
1169 Eastern Parkway
Suite 1166
Louisville, KY 40217
502.451.8262

Reports of sexual misconduct may be made by third-parties (individuals who were not the complainant or respondent) to:

Office of Public Safety
Centro- Treece Hall 054
502-272-7777

or

Lynn Bynum, Title IX Coordinator
Horrigan Hall 202B
502-272-8236

Requests for amnesty from drug, alcohol, and other policies should be directed to the Title IX Coordinator or his/her designee who shall consider the request and make a recommendation to the appropriate university official. Those individuals may approve or disapprove the request after considering all of the University's interests.

e. Reporting under the Clery Act - The University has various reporting obligations under the Clery Act which promotes campus safety by ensuring that students, employees, parents and the broader community are well-informed about important public safety and crime prevention matters. Details about the University's reporting obligations under Clery may be obtained at: <https://www.notalone.gov/assets/ferpa-clerychart.pdf>. Depending on the circumstances, the Clery Act may also require the University to issue timely warnings to the campus community about crimes that have already occurred but may continue to pose a serious or ongoing threat to students and employees. Certain Campus Security Authorities (CSAs) are required to report information gathered during the inquiry of criminal activity. These CSAs include non-law enforcement campus security officers and local law enforcement officers. These CSAs will typically be required to document incidents in a fashion that contains personally identifiable information about the parties involved and witnesses. Other CSAs, such as University officials, are not typically required to report personally identifiable information.

7. Inquiry Procedures and Protocols

The University shall process all complaints of sexual misconduct, regardless of where the conduct occurred, to determine whether the conduct occurred in the context of an education program or activity or had continuing effects on campus or in an off-campus education program or activity. The University shall determine whether any alleged off-campus sexual misconduct occurred in the context of an education program or activity of the University. If the off-campus misconduct occurred in the context of an education program or activity of the University, the University shall treat the complaint in the same manner that treats complaints regarding on-campus conduct. Once the University is on notice of an allegation of off-campus sexual misconduct, the University shall assess whether there are any continuing effects on campus or in an off-campus education program or activity that are creating or contributing to a hostile environment and, if so, the University shall address the hostile environment in the same manner in which it would address a hostile environment created by on-campus misconduct. Since there may be continuing effects of off-campus sexual misconduct while at University or in an off-campus education program or activity, if the off-campus sexual misconduct did not occur in the context of an education program or activity of the University, the University shall consider the effects of the off-campus misconduct when evaluating whether there is a hostile environment on campus or in an off-campus education

program or activity. The Title IX Coordinator or an individual designated by the Title IX Coordinator shall conduct the inquiry of any complaint of sexual misconduct under this policy. An inquiry may entail interviews with witnesses, a review of any documentary or electronic evidence, a review of medical evidence, a review of campus security data, or a review of any other material which the investigator deems relevant to an assessment of the facts surrounding the complaint. As soon after the initiation of the inquiry as possible, the Title IX Coordinator or the designated investigator shall notify all University employees or students who are believed to have documentary, electronic, or tangible evidence to preserve such evidence for the inquiry. The inquiry shall provide the respondent and the complainant with equitable rights during the inquiry. The University will endeavor to complete inquiries and resolve complaints within sixty (60) days of the date on which the complaint was received, but the University's primary objective is a thorough inquiry and complaint resolution. Thus, if the Title IX Coordinator believes additional time beyond sixty days is necessary to complete a thorough inquiry and to resolve the complaint, the Title IX Coordinator shall advise the appropriate vice president of such information in writing and request an extension of time for the inquiry and complaint resolution, and such extensions shall be approved whenever the appropriate vice president believes an extension is warranted.

The University shall coordinate its Title IX inquiry with any other ongoing University or criminal inquiry of the incident and establish appropriate fact-finding roles for each investigator. The following information may be shared with law enforcement during a parallel inquiry:

- (a) Non-emergency situations- Information regarding student records will be shared in accordance with the Bellarmine University Student Records Policy
- (b) Emergency situations- Urgent requests for student information, e.g. address, telephone number, or immediate whereabouts, based upon an apparent emergency, should be handled when possible by the Dean of Students office. The University may release information from education records to appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health or safety of the student or other persons. This is to be strictly interpreted.

The University will not share any FERPA-protected information with law enforcement during a parallel inquiry, unless that information is the subject of a subpoena or other judicial process.

Government investigative agencies as such have no inherent legal right to access to University files and records. When additional information is requested, it may be released only on written authorization from the student or employee. If such authorization is not given, the information should be released only on court-order or subpoena. If a subpoena is served, the student or employee whose record is being subpoenaed should be notified and that subpoena should be referred to the institution's legal counsel.

The University shall consider whether information can be shared among the investigators so that complainants are not unnecessarily required to give multiple statements about a traumatic event. The University should not wait for the conclusion of a criminal inquiry or criminal proceeding to begin its own Title IX inquiry. If the fact-finding portion of the University's Title IX inquiry is suspended due to the existence of a criminal inquiry, the University's fact-finding

portion of the Title IX inquiry shall resume promptly once law enforcement officials have completed their evidence-gathering state of the criminal inquiry. The University shall periodically update the parties on the status of the inquiry and inform the parties when the University resumes its Title IX inquiry following any delay associated with a criminal inquiry.

The University shall immediately investigate any possible retaliation against the complainant, including threats, intimidation, coercion, or discrimination.

8. Grievance/Adjudication Procedures

The University has jurisdiction over Title IX complaints. The University shall adopt and publish grievance procedures for the prompt and equitable resolution of discrimination complaints, including harassment complaints, filed by complainants against University employees, students and third parties, which shall:

- Provide notice to students and employees of the grievance procedures, including where complaints may be filed.
- Explain generally the grievance/adjudication process.
- Conduct hearings in a manner that minimizes additional emotional trauma on the complainant.
- Explain the possible results of the adjudication process, including sanctions, remedies/accommodations for the complainant, and additional remedies for the University community.
- Explain that mediation is never appropriate in sexual misconduct cases.
- Notify the complainant of the right to end the informal process at any time and to begin the formal stage of the complaint process, if voluntary informal mechanisms for resolving some types of sexual harassment complaints are provided.
- Provide for the application of the procedure to complaints filed by students, faculty or staff member or others on their behalf alleging sexual misconduct carried out by employees, students, or third parties.
- Provide for adequate, reliable, and impartial inquiry of complaints, including the opportunity for both the complainant and the respondent to present witnesses and evidence.
- Designate reasonably prompt time frames for the major stages of the complaint process.
- Provide for simultaneous written notice to the complainant and the respondent of the outcome of the complaint and any appeal.
- Provide assurance that the University will take steps to prevent the recurrence of any sexual misconduct and remedy discriminatory effects on the complainant and others, if appropriate.
- Provide adequate definitions of “sexual harassment” and an explanation as to when such conduct creates a hostile environment.
- Include reporting policies and protocols, including provisions for confidential reporting.
- Identify the employee or employees responsible for evaluating requests for confidentiality.
- Provide notice that Title IX prohibits retaliation.
- Provide notice of a student’s right to file a criminal complaint and a Title IX complaint simultaneously.
- Provide notice of available interim measures that may be taken to protect the student in the educational setting.

- State the evidentiary standard that must be used (preponderance of the evidence) in resolving a complaint.
- Provide notice of the potential remedies for respondents.
- Provide notice of the potential sanctions or protective measures which may be imposed against the respondents, including, specifically, the sanctions regarding rape, acquaintance rape, domestic violence, dating violence, sexual assault, or stalking.
- Provide sources of counseling, advocacy and support.
- Provides the respondent with due process.
- Provide for the extension of all rights given to the respondent to the complainant.
- Provide notice of hearing(s) to both parties.
- Identify a process by which either party may raise issues related to potential conflicts of interest of the adjudicators.
- Identify the trained individuals who will determine whether the alleged sexual misconduct occurred and the individuals who will determine the sanction.
- Provide for all proceedings to provide a prompt, fair, and impartial inquiry and resolution.
- Provide for all proceedings to be conducted by officials who receive annual training on the issues related to domestic violence, dating violence, sexual assault, and stalking and how to conduct an inquiry and hearing process that protects the safety of complainants and promotes accountability.
- Provide an equal opportunity for the parties to present relevant witnesses and other evidence.
- Provide the parties with similar and timely access to any information that will be used at the hearing.
- Provide a description of the types of evidence that may or may not be presented.
- Provide an equal opportunity for the parties to have an advisor of their choice present during any institutional disciplinary proceeding, including interviews or hearings.
- Impose equal restrictions on the ability of lawyers or other advisors to speak or otherwise participate in the proceedings.
- Identify the persons who may attend and/or participate in the adjudication process and the extent of their participation.
- Provide an equal opportunity for the parties to present expert testimony.
- Provide an equal opportunity for the parties to appeal.
- Require the same type of review be applied on appeal, regardless of which party files the appeal.
- Describe the appellate procedures, grounds for appeal, the person/entity that will decide appeals, and the applicable reasonably prompt time frames for appeal.
- Include a statement that the University will not require a party to abide by a nondisclosure agreement, in writing or otherwise that would prevent the redisclosure of information relating to the outcome of the proceeding.
- Provide an equal opportunity for the parties to be present at the hearing.
- Permit the hearing to proceed if the complainant is not present.
- Provide the parties with an equal opportunity to cross-examine witnesses.
- Provide a description of alternative methods that preclude the respondent from personally cross-examining the complainant.
- Require the University to notify both parties in writing about the outcome of the complaint.

- Require the University to notify both parties in writing if there is any change to the results of the hearing that occurs prior to the time that such results become final.
- Require the University to notify both parties in writing when such results become final.
- Require the University to notify the complainant as to whether or not it found that the alleged conduct occurred, any individual remedies offered or provided to the complainant or any sanctions imposed on the respondent that directly relate to the complainant, and other steps the University has taken to eliminate the hostile environment, if the University finds one to exist, and prevent recurrence.
- Prohibit questioning about the complainant's sexual history with anyone other than the respondent.
- Acknowledge that the mere fact of a current or previous consensual dating or sexual relationship between the two parties does not itself imply consent or preclude a finding of sexual misconduct.
- Prohibit University officials from notifying the respondent of the individual remedies offered or provided to the complainant.
- Require the University to offer the complainant all services needed to remedy the hostile environment on an interim basis.
- Require the University to offer the complainant all services needed as a final remedy to the hostile environment, even if the complainant declined the service as part of an interim measure.
- Require the University to consider remedies for the broad campus population whenever the University is unable to conduct a full inquiry.
- Require the University to take steps to provide appropriate remedies for the complainant and the broader campus population when the respondent is not affiliated with the University.

The University shall continue to protect the complainant after a determination that sexual misconduct has occurred.

The University's Grievance Procedure, consistent with these requirements, is attached as Exhibit "A".

9. Prevention and Education

This policy shall be accessible to students and employees with disabilities. This policy, reporting forms, information and training shall be accessible to students and employees who are English language learners. This policy shall be distributed on campus in such a way that all students, regardless of their immigration status, including undocumented students and international students, are aware of their rights under Title IX. Title IX prohibits retaliation against the complainant, anyone who files a third-party report, any witness or anyone who otherwise participates in the investigative and/or disciplinary process, and the University will take steps to prevent retaliation and strong responsive action if it occurs, including any retaliatory actions by University officials. The University must routinely take steps to inform students, faculty and staff that the University's primary concern is student safety and that the use of alcohol and drugs never makes the survivor at fault for sexual misconduct.

a. Residence Life Student Staff Members (RLSSMs) - As noted above, RLSSMs are responsible employees. As such, RLSSMs shall explain to the student (before the student reveals confidential information) that although the RLSSM must report the names of the respondent and the complainant and other relevant facts to the Title IX Coordinator or other designated University officials, the University will protect the student's confidentiality to the greatest extent possible. RLSSMs shall provide complainants with information regarding on-campus resources, including victim advocacy, housing assistance, academic support, counseling, disability services, health and mental health services, legal assistance, and the local rape crisis center or other off-campus resources.

b. Sexual Violence and Prevention Program - The University's sexual violence and prevention program (SVPP) shall clearly identify the offices or individual with whom complainants can speak confidentially. The SVPP shall clearly identify the offices or individuals who can provide resources such as victim advocacy, housing assistance, academic support, counseling disability services, health and mental health services, and legal assistance. The SVPP shall identify the University's responsible employees. The SVPP shall explain that, if complainants report incidents to responsible employees, these employees are required to report the incident to the Title IX Coordinator or other appropriate official, including the names of the individuals involved in the sexual misconduct, the date, time, and location. The University's approach to prevention, including the type and frequency of prevention programming and education/outreach activities, shall consist of:

Program/ Activity	Description	Frequency
BraveBU	BraveBU is a culture of care campaign that is focused on the promotion of bystander intervention and healthy behaviors. Often led by students, BraveBU programs occur throughout the academic year and focus on issues such as sexual assault prevention, healthy relationships, and wellness-based discussions. The initial BraveBU program is led at new student orientation each August. Staff members from the Dean of Students Office explain the culture of care at Bellarmine, walk students through the definitions included in the campus sexual misconduct policy and facilitate dialogue around realistic and helpful strategies to avoid being a bystander.	Annually
Haven	Haven: All new students complete Haven each fall. Haven is an online series of modules that inform students of the campus sexual misconduct policy, methods of reporting, and utilizes a tone rooted in positive psychology. Students complete a pre-test and the modules in early September. Students then complete a post-test one month after completion of part 1. Aggregate data and population specific data is used to generate learning outcomes for ongoing programming. Faculty and staff complete a different version of online training modules with similar learning outcomes. Haven is also used with all new faculty and staff as a component of onboarding training.	Annually; each Fall Semester

Program/ Activity	Description	Frequency
Written Notification of University's Sexual Misconduct Policies	Annually, every student receives written notification of the university's sexual misconduct policies which includes available resources and reporting procedures.	Annually
New Employee Orientation	Every new employee attends an employee orientation hosted by Human Resources. During this session, staff members from Human Resources distribute and explain the sexual misconduct policy. Occurs at beginning of employment.	At beginning of employment
Annual Employee Training	Each employee completes an on-line training module which disseminates the sexual misconduct policy including the educational outcomes outlined in this policy to include reporting, responsible employee duties, confidential reporting, on and off campus resources, etc. Occurs on a regular basis.	On a regular basis

c. Bystander Intervention - The University shall utilize bystander intervention as a tool to prevent sexual misconduct. In implementing the bystander-focused prevention methods, the University shall implement the common components of safe and positive bystander intervention and delivery methods found at: <https://www.notalone.gov/assets/bystander-summary.pdf>.

d. Campus Assessments - The University shall conduct a climate survey in accordance with the guidelines found at: <https://www.notalone.gov/assets/ovw-climate-survey.pdf>. The Title IX Coordinator or designee shall coordinate the collection and analysis of information from an annual climate surveys.

e. Educating Students - The University shall conduct programs to educate students about the University's sexual misconduct policy at least one time during each calendar year. At sexual misconduct awareness events, the University shall provide information on (a) Title IX, (b) how to file a Title IX complaint with the University, (c) resources available to sexual misconduct complainant(s) such as counseling, mental health and health services, and (d) options for reporting an incident of sexual misconduct to campus or local law enforcement. The University shall provide education programs to promote the awareness of rape, acquaintance rape, domestic violence, sexual assault, and stalking, which shall include:

1. primary prevention and awareness programs for all incoming students and new employees, which shall include -
 - (a) a statement that the University prohibits the offenses of domestic violence, dating violence, sexual assault, and stalking;
 - (b) the definition of domestic violence, dating violence, sexual assault, and stalking in the state of Kentucky;
 - (c) the definition of consent, in reference to sexual activity, in the state of Kentucky;

(d) safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than such individual;

(e) information on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks;

(f) information described in 20 U.S.C. 1092(f)(8)(B)(ii) through (vii);
and

2. ongoing prevention and awareness campaigns for students and faculty, including the information described in clauses (a) through (f) of subparagraph 1. above.

10. Training

In all forms of training, the University shall establish methods for verifying that the training was effective.

a. Student Training - The University shall provide the following training for students:

- Encouragement to report incidents of sexual misconduct.
- How to report sexual misconduct to campus or local law enforcement and the ability to pursue law enforcement proceedings simultaneously with a Title IX grievance.
- General information on Title IX.
- What constitutes sexual misconduct under the University's policies.
- The University's definition of consent as applicable to sexual conduct, including examples.
- How the University analyzes whether unwelcome sexual conduct creates a hostile environment.
- Available reporting options, including formal reporting and confidential disclosure options and any timeframes set by the University for reporting.
- Places where students, faculty, and staff members can seek confidential support services.
- Grievance procedures used to process sexual misconduct complaints.
- Disciplinary code provisions relating to sexual misconduct and the consequences of violating those provisions.
- Effects of trauma, including neurobiological changes.
- The role alcohol and drugs often play in sexual misconduct incidents, including the deliberate use of alcohol and/or other drugs to perpetuate sexual misconduct.
- Strategies and skills for bystanders to intervene to prevent possible sexual misconduct.
- Title IX's protections against retaliation.
- Persons on campus to whom students, faculty, and staff members can confidentially report incidents of sexual misconduct.
- An explanation that students, faculty or staff members do not need to determine whether incidents of sexual misconduct or other sexual harassment created a hostile environment before reporting the incident.

With regard to all training directed toward students, the University shall consider educational methods that are most likely to help students retain information when designing its training, including repeating the training at regular intervals.

b. Residence Life Student Staff (“RLSS”) Training - The University shall provide the following training for RLSS:

- Places where students, faculty and staff can seek confidential support services.
- Information about local rape crisis centers or other off-campus resources so that RLSSs can provide this information to complainants.

c. Faculty and Staff Training - The University shall provide training on a regular basis, even if employees have prior relevant experience in sexual misconduct, to all employees likely to witness or receive reports of sexual harassment and violence, including faculty, University safety office employees, University administrators, University counselors, athletic coaches, health personnel and RLSSs. The University shall determine how training should be conducted, who has the relevant expertise to conduct the training, and who should receive the training to ensure that the training adequately prepares employees, particularly responsible employees, to fulfill their duties under Title IX. Employees who work with international students shall be trained on the University’s sexual misconduct policies. The University requires (a) training or experience in handling sexual misconduct complaints and (b) training in the operation of the University’s grievance procedures for the Title IX Coordinator, others who receive complaints, investigators, and adjudicators. The University shall provide the following training for faculty and staff:

- Practical information about (a) how to prevent and identify sexual misconduct, including same-sex sexual misconduct. (b) the behaviors that may lead to and result in sexual misconduct; (c) the attitudes of bystanders that may allow conduct to continue; (d) the potential for revictimization by responders and its effect on complainants; (e) appropriate methods for responding to a complainant who may have experienced sexual misconduct, including the use of nonjudgmental language; (f) the impact of trauma on complainant s; and (g) the person(s) to whom such misconduct must be reported.
- Training to explain responsible employees' reporting obligation, including what should be included in a report and any consequences for the failure to report and the procedure for responding to complainants' requests for confidentiality, as well as provide the contact information for the University's Title IX Coordinator.
- Practical information on how and when to identify and report harassment and/or to appropriate University officials.

d. Training for Responsible Employees - Responsible employees are those employees defined in Section 5. Responsible employees shall be trained so that they will know how to respond properly to sexual misconduct complaints. The University shall train responsible employees to inform students and employees of: (a) the reporting obligations of responsible employees; (b) students' and employees’ option to request confidentiality and available confidential advocacy, counseling, or other support services; and (c) their right to file a Title IX complaint with the University and to report a crime to campus or local law enforcement.

e. Special Training for Title IX Coordinator and Others Involved in Grievance Procedure - The University shall require training for the Title IX Coordinator, others who receive complaints, investigators, and adjudicators to include information on: (a) working with and interviewing persons subjected to sexual misconduct, including same-sex sexual misconduct; (b) the proper standard of review for sexual misconduct complaints (preponderance of the evidence); (c) information on consent and the role drugs or alcohol can play in the ability to consent; (d) the

importance of accountability for individuals found to have committed sexual misconduct; (e) the need for remedial actions for the respondent, complainant, and University community; (f) how to determine credibility; (g) how to evaluate evidence and weigh it in an impartial manner; (h) how to conduct inquiries; (i) confidentiality; (j) the effects of trauma, including neurobiological change; and (k) cultural awareness training regarding how sexual misconduct may impact individuals differently depending on their cultural backgrounds. All staff members involved in the grievance procedure must be trained so that they are capable of providing culturally competent counseling for all complainants. Counselors and other staff members who are responsible for receiving and responding to complaints of sexual misconduct, including investigators and hearing board members, shall receive appropriate training about working with LGBT and gender-nonconforming individuals and same-sex sexual misconduct. Counselors and other staff members who are responsible for receiving and responding to complaints of sexual misconduct, including investigators and hearing board members, and others counseling complainants who have experienced sexual misconduct shall be trained to be aware of the special issues that international students may encounter. Any University officials responsible for discussing safety and confidentiality with complainants shall be trained on the effects of trauma and the appropriate methods to communicate with complainants subjected to sexual misconduct. Any individual or body handling appeals shall be trained in the dynamics of and trauma associated with sexual misconduct.

f. Special Training for Pastoral and Professional Counselors - The University shall instruct pastoral and professional counselors to inform students and employees:

- Of their right to file a Title IX complaint with the University and a separate complaint with campus or local law enforcement.
- That they are available to assist the student in filing such complaints.
- That Title IX includes protections against retaliation.
- That University officials will not only take steps to prevent retaliation but also take strong responsive action if it occurs.

Pastoral and professional counselors shall be trained to ensure that they understand the extent to which they may keep a report confidential. In addition to receiving the training listed for pastoral and professional counselors, non-professional counselors or advocates shall be trained to report only general information about incidents of sexual misconduct and to avoid disclosing personally identifiable information.

LIST OF EXHIBITS

“A” - Grievance Procedure