



MERITUS SCHOOL OF OSTEOPATHIC MEDICINE

Non-Discrimination Policy

Policy Number:

Date: 05.15.2025

Approved by: Dr. Murray Berkowitz

It is the firm policy of Meritus School of Osteopathic Medicine (MSOM) not to discriminate based on race, ethnicity, color, sex, sexual orientation, gender, gender identity, religion, national origin, age, disabilities, or any other legally protected class status.

Policy & Procedure Statement

MSOM strives to create and maintain an educational and work environment in which people are treated with dignity, decency, and respect. The environment of the school should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. MSOM will not tolerate unlawful discrimination or harassment of any kind. Sexual or other discriminatory harassment of MSOM students is prohibited; likewise, students are prohibited from engaging in harassing behavior directed at MSOM's employees, visitors, vendors, and contractors. This policy is designed to ensure a safe and non-discriminatory educational and work environment and to meet legal requirements, including but not limited to Title VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990 as Amended, 2008. All students and employees are expected to comply with this policy and take appropriate measures to create an atmosphere free of discrimination and harassment. Through enforcement of this policy and by education of students and employees, the school will seek to prevent, correct, and discipline behavior that violates this policy. Appropriate disciplinary action will be taken against any employee or student who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or dismissal/termination.

Prohibited Conduct Under This Policy

MSOM, in compliance with all applicable federal, state, and local anti-discrimination and harassment laws and regulations, enforces this policy by the following definitions and guidelines:

Unlawful Discrimination: It is a violation of MSOM policy to discriminate in the selection of administrative personnel, faculty and staff, and students, the provision of employment opportunities, benefits, or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, based on race, ethnicity, color, sex, sexual orientation, gender, gender identity, religion, national origin, age, disabilities, or any other protected class status. Further, it is a violation of MSOM Policy to discriminate in the selection of administrative personnel, faculty and staff, and

students if the basis of that discriminatory treatment is, in whole or in part, genetic information or marital status in its programs, activities, hiring, or the admission of students. Discrimination of this kind may also be strictly prohibited by a variety of federal, state, and local laws, including but not limited to, Title VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990 as Amended, 2008. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws. Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

Unlawful Harassment: It is a violation of MSOM policy to exhibit behavior that is so severe or pervasive that it interferes with an individual's performance or creates an intimidating, hostile, or offensive environment based on age, race, color, gender, gender identity and expression, national origin, ancestry, sexual orientation, religion, creed, disability, genetic information, marital status or any other legally protected class status. It may include, but is not limited to: unwanted physical contact, use of epithets, inappropriate jokes, comments or innuendos, obscene or harassing telephone calls, emails, letters, notes, or other forms of communication.

Retaliation against a person who reports, complains about, or participates in the investigation of discrimination and/or harassment is also prohibited. Retaliation occurs when an adverse action is taken on an employee or a student because the employee or the student participated in a protected activity. A hostile or offensive environment for another person can be created by sending emails that have content that is based on race, sex, gender identity, national origin, disability, sexual orientation, or any other legally protected characteristic. Further, images on a computer monitor that contains matter that can be offensive to others could give rise to complaints of harassment. Information concerning an allegation of discrimination, harassment, and/or retaliation will be handled confidentially insofar as possible. Any employee or student of the SOM who receives a complaint of discrimination, harassment, and/or retaliation or who otherwise learns of the occurrence of harassment has the responsibility to take prompt steps to ensure that the matter is addressed, even if the complainant refuses to be identified.

Enforcement

All members of the MSOM community should be aware that the school is concerned about discrimination, harassment, and retaliation and is prepared to act to prevent and correct such behavior. Individuals who engage in such behavior are subject to discipline, up to and including termination or dismissal/expulsion. The SOM considers discrimination, harassment in all its forms, and retaliation to be a serious offense. These types of conduct create exposure and liability for the MSOM and the individual.

All MSOM employees and students have a responsibility and are required to discourage and eliminate conduct inconsistent with this policy. Faculty, staff, and administrators are required to report any occurrence of discrimination, harassment, and retaliation they are aware of. Depending on the circumstances, the person against whom the complaint has been made may be placed on administrative leave pending investigation. Other interim measures may also be implemented to minimize any potential negative impact on the parties and/or to maintain the integrity of the investigation. Appropriate remedial action will be taken depending on the outcome of the investigation. No employee or student will be retaliated against for making a complaint, for bringing inappropriate conduct to the attention of management, or for participating in any investigation or hearing. Persons who are not employees of the SOM, but who perform work at the SOM for its benefit (such as contractors and their employees, temporary employees provided by agencies, visitors employed in joint projects, etc.) must comply with this policy. Complaints against such individuals will be investigated and addressed.

REPORTING

Any person who believes they have experienced unlawful discrimination or harassment is encouraged to make a report at any time, including during non-business hours, by using the telephone number or e-mail address of either the VP of Human Resources or the Associate Dean of Student Services and Community Engagement, through the Compliance Hotline or by mail to the office address:

For Students:

Chanté, Richardson, PhD, MBA
Associate Dean of Student Services and Community Engagement
11120 Health Drive
Hagerstown, MD 21742
Tel: (301) 790-8267
Email: chante.richardson@msom.org

For Employees (administration, faculty, and staff):

Scott Salzetti
VP of Human Resources
11116 Medical Campus Road
Hagerstown, MD 21742
Tel: (301) 790-8681
Scott.Salzetti@meritushealth.com

Compliance Hotline: 1-888-847-9247 or (301) 790-7950

Grievance Procedures for Students:

A. Submitting a Grievance: A student may submit a civil rights grievance either orally or in writing with the Associate Dean of Student Services and Community Engagement.

B. Investigating a Grievance:

1. The Associate Dean of Student Services and Community Engagement will complete an initial review of all civil rights grievances filed and, if necessary, contact the individual for additional information.

- a. All grievances should be entered into the electronic incident reporting system.

2. In conjunction with the Chief Compliance Officer, the Associate Dean of Student Services and Community Engagement will investigate the grievance.

3. Whether or not requested by the student, interim protective measures (such as a no-contact directive or a supervised or alternative reporting structure) to support a positive work or learning environment while an investigation is proceeding may be implemented at the MSOM's discretion.

4. To the extent possible, and following applicable law, all parties will take appropriate steps to preserve the confidentiality of files and records relating to grievances.

5. For any violations of MSOM's non-discrimination policy, the Chief Compliance Officer will ensure that responsible parties develop and implement Corrective Action Plans.

6. For any substantial or intentional violations of MSOM's non-discrimination policy, members of the Dean's Cabinet will be involved in the review and remediation.

C. Responding to a Grievance:

1. The Investigator will provide a written response to the student after the investigation. All attempts will be made to provide a written response no later than thirty (30) days after the grievance is filed.

2. The student filing the grievance may appeal MSOM's findings by writing to MSOM's Dean within fifteen (15) days of receiving the Investigator's decision.

- a. A Grievance Committee, composed of MSOM leaders, will review any appeals and provide feedback to the Dean.

- b. The Dean will provide a written response to the appeal. All attempts will be made to provide a written response to an appeal no later than thirty (30) days after receipt of the

appeal.

3. The student filing the grievance and/or appeal will be informed of their right to file a complaint with the U.S. Department of Education, Office for Civil Rights.

Grievance Process for Employees:

A. Submitting a Grievance: An employee may submit a civil rights grievance either orally or in writing with the VP of Human Resources.

B. Investigating a Grievance:

1. The VP of Human Resources will complete an initial review of all civil rights grievances filed and, if necessary, contact the individual for additional information.

a. All grievances should be entered into the electronic incident reporting system.

2. In conjunction with the Chief Compliance Officer, the VP of Human Resources will investigate the grievance.

3. Whether or not requested by the employee, interim protective measures (such as a no-contact directive or a supervised or alternative reporting structure) to support a positive work or learning environment while an investigation is proceeding may be implemented at the MSOM's discretion.

4. To the extent possible, and following applicable law, all parties will take appropriate steps to preserve the confidentiality of files and records relating to grievances.

5. For any violations of MSOM's non-discrimination policy, the Chief Compliance Officer will ensure that responsible parties develop and implement Corrective Action Plans.

6. For any substantial or intentional violations of MSOM's non-discrimination policy, members of the Dean's Cabinet will be involved in the review and remediation.

C. Responding to a Grievance:

1. The VP of Human Resources will provide a written response to the employee after the investigation. All attempts will be made to provide a written response no later than thirty (30) days after the grievance is filed.

2. The employee filing the grievance may appeal MSOM's findings by writing to MSOM's Dean within fifteen (15) days of receiving the Investigator's decision.

a. A Grievance Committee, composed of MSOM faculty and staff will review any appeals and provide feedback to the Dean.

b. The Dean will provide a written response to the appeal. All attempts will be made to provide a written response to an appeal no later than thirty (30) days after receipt of the appeal.

3. The employee filing the grievance and/or appeal will be informed of their right to file a complaint with the Federal Office for Civil Rights.