

MERITUS SCHOOL OF OSTEOPATHIC MEDICINE

Title IX Policy and Grievance Procedures

Policy Number:

Effective Date: 05.15.2025

Approved by:

It is the firm policy of the Meritus School of Osteopathic Medicine not to discriminate on the basis of race, ethnicity, color, sex, sexual orientation, gender, gender identity, sex characteristics, religion, national origin, age, disabilities, or pregnancy-related conditions.

Policy & Procedure Statement

Meritus School of Osteopathic Medicine (MSOM) is committed to providing an educational and work environment free from all forms of sex discrimination, including sexual harassment, as required by Title IX of the Education Amendments of 1972 and its implementing regulations.

MSOM strives to create and maintain an environment in which people are treated with dignity, decency, and respect. This environment is characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Employees and students should be able to work and learn in a safe and stimulating atmosphere. The accomplishment of this goal is essential to the mission of MSOM. For that reason, MSOM will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education, MSOM will seek to prevent, correct, and discipline behavior that violates this policy. All employees and students, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any individual who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, termination of employment, or expulsion.

Grievance Procedures Overview

MSOM has adopted grievance procedures that provide for the prompt and equitable resolution of student and employee sex discrimination complaints. These procedures include:

- 1. Equal treatment of complainants and respondents
- 2. Objective evaluation of all relevant evidence
- 3. Prohibition of conflicts of interest or bias for or against complainants or respondents
- 4. Presumption that the respondent is not responsible until a determination is made
- 5. Reasonably prompt timeframes for all stages of the grievance process
- 6. Description of possible disciplinary sanctions and remedies
- 7. Statement of the standard of evidence (preponderance of evidence)
- 8. Procedures and bases for appeals
- 9. Description of supportive measures available to both parties

For a full description of the grievance procedures, please see below "Grievance Procedures for Complaints of Title IX Sexual Harassment Involving Student Complainants or Student Respondents (§ 106.45)."

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:

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, on race, ethnicity, color, sex, sexual orientation, gender, gender identity, sex characteristics, religion, national origin, age, disabilities, pregnancy or related conditions. 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.

Sex-Based Harassment: Sex-based harassment is a form of sex discrimination and includes sexual harassment, as well as harassment based on sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. It can take the form of quid pro quo harassment, sexual assault, dating violence, domestic violence, stalking, or hostile environment harassment.

Title IX Regulations

All members of the MSOM community should be aware that Meritus Health and MSOM are concerned about discrimination, harassment, and retaliation and are 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. MSOM considers discrimination, harassment in all its forms, and retaliation to be a serious offense. Retaliation against a person who reports, complains about, or participates in the investigation of discrimination and/or harassment is prohibited. Retaliation occurs when an adverse action is taken against an employee or a student because the employee or the student participated in a protected activity. Information concerning an allegation of discrimination, harassment, and/or retaliation will be handled confidentially insofar as possible. Any employee or agent of MSOM 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.

MSOM supervisory personnel have a responsibility and are required to discourage and eliminate conduct inconsistent with this policy. Supervisors 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 upon 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 MSOM, but who perform work at MSOM 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.

For any questions or concerns related to this policy or to report a potential violation, please contact:

Title IX Coordinator:

Patrick Slagle, Assistant Dean of Student Affairs 11120 Health Drive Hagerstown, MD 21742

Email: <u>TitleIX@msom.org</u> Phone: (240) 313-9602

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

Grievance Procedures for Complaints of Title IX Sexual Harassment Involving Student Complainants or Student Respondents (§ 106.45)

Meritus School of Osteopathic Medicine (MSOM) has adopted Title IX grievance procedures that provide for the prompt and equitable resolution of complaints made by students, employees, or other individuals who are participating or attempting to participate in its education program or activity in the United States, or by the Title IX Coordinator. These grievance procedures address complaints of Title IX Sexual Harassment that involve a student party.

For purposes of this policy, "Sexual Harassment" means conduct on the basis of sex that satisfies one or more of the following:

- 1. **Quid Pro Quo**: An employee of MSOM conditioning the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct;
- 2. **Hostile Environment**: Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to MSOM's education program or activity; or
- 3. **Specific Offenses**: Sexual assault, dating violence, domestic violence, or stalking as defined under the Violence Against Women Act (VAWA).

Complaints:

The following people have a right to make a complaint of Title IX Sexual Harassment, requesting that MSOM investigate and make a determination about alleged Title IX Sexual Harassment under Title IX:

- A "complainant," which includes:
 - a student or employee of MSOM who is alleged to have been subjected to conduct that could constitute Title IX Sexual Harassment; or
 - a person other than a student or employee of MSOM who is alleged to have been subjected to conduct that could constitute Title IX Sexual Harassment at a time when that individual was participating or attempting to participate in MSOM's education program or activity in the United States;
- A parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant; or
- MSOM's Title IX Coordinator.

MSOM may consolidate complaints of Sexual Harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against another party, when the allegations of Sexual Harassment arise out of the same facts or circumstances. When more than one complainant or more than one respondent is involved, references below to a party, complainant, or respondent include the plural, as applicable.

Basic Requirements of Title IX Grievance Procedures:

MSOM will treat complainants and respondents equitably.

MSOM requires that any Title IX Coordinator, Investigator, or Decision Maker not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.

MSOM presumes that the respondent is not responsible for the Sexual Harassment until a determination is made at the conclusion of its grievance procedures.

Timeframes. MSOM has established the following timeframes for the major stages of the grievance procedures:

- **Initial Evaluation**: Within 10 days of receipt of a Formal Complaint, the Title IX Coordinator will evaluate the complaint to determine whether or not it meets the criteria for investigation under Title IX and may reach out to the complainant for additional details during this time.
- **Investigation**: Typically completed within 30-45 days.
- **Evidence Review**: All relevant evidence will be shared with the parties, who will have at least 10 days to submit a written response before the investigative report is finalized.
- **Investigative Report Review**: The final report will be sent to the parties at least 10 days before the live hearing, and each party will have 10 days to provide a written response.
- **Live Hearing**: Mandatory for all formal complaints scheduled promptly after completion of the investigation.
- **Decision**: Written determination issued within 10 days of the live hearing.
- **Appeal**: Parties have 14 days from the written determination to file an appeal.

MSOM will make every reasonable attempt to adhere to the time frames set forth in these procedures. However, it is recognized that circumstances may necessitate an extension of time. Therefore, the Title IX Coordinator may extend the time limits outlined in these procedures for good cause, and will communicate in writing to all parties accordingly.

Privacy. MSOM will take reasonable steps to protect the privacy of the parties and witnesses during its grievance procedures. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consult with their family members, confidential resources, or advisors; or otherwise prepare for or participate in the grievance procedures. MSOM may restrict the unauthorized disclosure of information and evidence obtained solely through the grievance process, except for disclosures necessary for administrative proceedings or litigation related to the complaint. The parties cannot engage in retaliation, including against witnesses.

Objective Evaluation. MSOM will objectively evaluate all evidence that is relevant and not otherwise impermissible, including both inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a complainant, respondent, or witness.

Impermissible Evidence. The following types of evidence, and questions seeking that evidence, are impermissible (i.e., will not be accessed or considered, except by MSOM to determine whether one of the exceptions listed below applies; will not be disclosed; and will not otherwise be used), regardless of whether they are relevant:

- Evidence that is protected under a privilege recognized by Federal or State law or evidence provided
 to a confidential employee, unless the person to whom the privilege or confidentiality is owed has
 voluntarily waived the privilege or confidentiality;
- A party's or witness's records that are made or maintained by a physician, psychologist, or other
 recognized professional or paraprofessional in connection with the provision of treatment to the
 party or witness, including medical records, health information, or clinical documentation, unless
 MSOM obtains that party's or witness's voluntary, written consent and authorization under HIPAA
 and State privacy laws for use in its grievance procedures; and
- Evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about the complainant's prior sexual conduct is offered to prove that someone other than the respondent committed the alleged conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to the

alleged Title IX Sexual Harassment. This exclusion does not apply to evidence of sexual conduct that is directly relevant to the alleged Sexual Harassment itself. The fact of prior consensual sexual conduct between the complainant and respondent does not by itself demonstrate or imply the complainant's consent to the alleged Title IX Sexual Harassment or preclude determination that Title IX Sexual Harassment occurred.

Written Notice of Allegations:

Upon initiation of these Title IX grievance procedures, MSOM will notify the parties in writing of the following with sufficient time for the parties to prepare a response before any initial interview:

- MSOM's Title IX grievance procedures and any informal resolution process;
- Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute Title IX Sexual Harassment, and the date(s) and location(s) of the alleged incident(s);
- Retaliation is prohibited;
- The respondent is presumed not responsible for the alleged Title IX Sexual Harassment until a determination is made at the conclusion of the grievance procedures. Prior to such a determination, the parties will have an opportunity to present relevant and not otherwise impermissible evidence to a trained, impartial Decision Maker;
- The parties may have an advisor of their choice who may be, but is not required to be, an attorney;
- The parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence and an investigative report that accurately summarizes this evidence;
- MSOM prohibits knowingly making false statements or knowingly submitting false information during grievance procedures; and
- The parties are entitled to inspect and review evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint

If, in the course of an investigation, MSOM decides to investigate additional allegations of Title IX Sexual Harassment by the respondent toward the complainant that are not included in the written notice or that are included in a consolidated complaint, it will provide written notice of the additional allegations to the parties.

Dismissal of a Complaint:

MSOM must dismiss the formal complaint with regard to that conduct for purposes of Sexual Harassment under Title IX if:

- The conduct alleged would not constitute Sexual Harassment even if proved;
- The conduct did not occur in MSOM's education program or activity; or
- The conduct did not occur against a person in the United States.

MSOM may dismiss the formal complaint or any allegations therein at any time during the investigation or hearing if:

- A complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein;
- The respondent is no longer enrolled or employed by MSOM; or

Specific circumstances prevent MSOM from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. Before dismissing the complaint, MSOM will make reasonable efforts to clarify the allegations with the complainant.

Dismissal Procedures. Upon dismissal, MSOM will promptly notify the complainant in writing of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then MSOM will notify the parties simultaneously in writing.

MSOM will notify the complainant that a dismissal may be appealed on the bases outlined in the Appeals section. If dismissal occurs after the respondent has been notified of the allegations, then MSOM will also notify the respondent that the dismissal may be appealed on the same basis. If a dismissal is appealed, MSOM will follow the procedures outlined in the Appeals section.

When a complaint is dismissed, MSOM will, at a minimum:

- Offer supportive measures to the complainant as appropriate;
- If the respondent has been notified of the allegations, offer supportive measures to the respondent as appropriate; and
- Take other prompt and effective steps, as appropriate, to ensure that Title IX Sexual Harassment does not continue or recur within MSOM's education program or activity.

Investigation:

MSOM will provide for adequate, reliable, and impartial investigation of complaints.

The burden is on MSOM, not on the parties, to conduct an investigation that gathers sufficient evidence to determine whether Sexual Harassment occurred.

MSOM will provide to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all meetings or proceedings with sufficient time for the party to prepare to participate.

MSOM will provide the parties with the same opportunities to be accompanied to any meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney.

- MSOM will not limit the choice or presence of the advisor for the complainant or respondent in any meeting or proceeding.
- MSOM may establish restrictions regarding the extent to which the advisor may participate in these grievance procedures, as long as the restrictions apply equally to the parties.

MSOM will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that is relevant and not otherwise impermissible.

MSOM will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible, regardless of relevance.

Evidence Access. MSOM will provide each party and the party's advisor, if any, with an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint, in the following manner:

MSOM will provide an equal opportunity to inspect and review both the relevant and not otherwise
impermissible evidence and the same written investigative report that accurately summarizes this
evidence;

- MSOM will provide a reasonable opportunity of at least 10 days to respond in writing to the evidence and investigative report prior to completion of the investigative report;;
- MSOM will consider such written responses before completing the investigative report;
- MSOM will provide the parties and their advisors, if any, with a copy of the investigative report at least 10 days prior to a hearing for their review and written response; and
- MSOM will take reasonable steps to prevent and address the parties' and their advisors' unauthorized disclosure of information and evidence obtained solely through the Title IX Sexual Harassment grievance procedures.

Questioning the Parties and Witnesses:

MSOM provides a process for questioning parties and witnesses that ensures fair treatment and protects the rights of all participants. This process allows the Decision Maker to adequately assess credibility when credibility is in dispute and relevant to evaluating one or more allegations of Title IX Sexual Harassment.

Questioning During the Investigation

- 1. The Investigator will conduct individual interviews with each party and witnesses as necessary to gather relevant evidence and assess credibility.
- 2. Each party may suggest additional witnesses or areas of inquiry for the Investigator's consideration.
- 3. While the Investigator may consider a refusal to answer relevant questions in evaluating credibility, no finding of responsibility will be made solely on a refusal to answer.

Questioning During the Live Hearing

MSOM will conduct a live hearing for all formal complaints of Title IX Sexual Harassment, that are not otherwise dismissed. At the live hearing, each party's advisor will be permitted to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally. Questioning during the hearing will proceed as follows:

1. Advisor-Conducted Questioning:

- Only the party's advisor may cross-examine the other party or witnesses.
- Cross-examination must be conducted directly, orally, and in real time.
- If a party does not have an advisor, MSOM will provide one at no cost for the purpose of conducting cross-examination.
- Parties will not personally question the other party or witnesses.

2. Decision Maker's Role:

- The Decision Maker will determine the relevance of each question before it is answered.
- If a question is excluded as irrelevant, harassing, or otherwise impermissible, the Decision Maker will explain the reason for exclusion.

3. Conduct of Questioning:

- Questions that are repetitive, harassing, or unclear will not be permitted.
- A party may rephrase a question if the Decision Maker allows it.
- 4. Effect of Refusal to Answer Questions: If a party or witness does not submit to cross-examination at the live hearing, the decision-maker must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-maker cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.

Procedures for a Live Hearing:

MSOM will conduct a live hearing for all formal complaints of Title IX Sexual Harassment. Advisors, not the parties, will conduct cross-examination. If a party does not have an advisor, MSOM will provide one at no cost.

MSOM will conduct the live hearing with the parties physically present in the same geographic location or, at MSOM's discretion or upon the request of either party, will conduct the live hearing with the parties physically present in separate locations with technology enabling the Decision Maker and parties to simultaneously see and hear the party or witness while that person is speaking.

MSOM will create an audio or audiovisual recording or transcript of any live hearing and make it available to the parties for inspection and review.

Determination of Whether Title IX Sexual Harassment Occurred:

Following an investigation and evaluation of all relevant and not otherwise impermissible evidence, MSOM will:

- **Standard of Proof**. Use the preponderance of evidence standard of proof to determine whether Title IX Sexual Harassment occurred. The standard of proof requires the Decision Maker to evaluate relevant and not otherwise impermissible evidence for its persuasiveness. If the Decision Maker is not persuaded under the applicable standard by the evidence that Title IX Sexual Harassment occurred, whatever the quantity of the evidence is, the Decision Maker will not determine that Title IX Sexual Harassment occurred.
- **Written Determination**: Notify the parties simultaneously in writing of the determination whether Title IX Sexual Harassment occurred under Title IX, including:
 - A description of the alleged Title IX Sexual Harassment;
 - Information about the policies and procedures that MSOM used to evaluate the allegations;
 - The Decision Maker's evaluation of the relevant and not otherwise impermissible evidence and determination of whether Title IX Sexual Harassment occurred;
 - When the Decision Maker finds that Title IX Sexual Harassment occurred, any disciplinary sanctions MSOM will impose on the respondent, whether remedies other than the imposition of disciplinary sanctions will be provided by MSOM to the complainant, and, to the extent appropriate, other students identified by MSOM to be experiencing the effects of the Title IX Sexual Harassment; and
- MSOM's procedures and permissible bases for the complainant and respondent to appeal.
- MSOM will not impose discipline on a respondent for Sexual Harassment prohibited by Title IX
 unless there is a determination at the conclusion of the Title IX grievance procedures that the
 respondent engaged in prohibited Sexual Harassment.
- If there is a determination that Sexual Harassment occurred, as appropriate, the Title IX Coordinator will:
 - Coordinate the provision and implementation of remedies to a complainant and other people MSOM identifies as having had equal access to MSOM's education program or activity limited or denied by sexual harassment;
 - Coordinate the imposition of any disciplinary sanctions on a respondent, including notification to the complainant of any such disciplinary sanctions; and
 - Take other appropriate prompt and effective steps to ensure that sexual harassment does not continue or recur within MSOM's education program or activity.

• Comply with the Title IX grievance procedures before the imposition of any disciplinary sanctions against a respondent; and

Prohibition on Retaliatory Discipline: MSOM will not discipline any party, witness, or other participant in Title IX grievance procedures in the following circumstances:

- 1. False Statement Claims: MSOM will not discipline someone for allegedly making a false statement solely because the final determination finds that sexual harassment did not occur. A finding of "not responsible" does not automatically mean that anyone lied or made a false report.
- Consensual Sexual Conduct: MSOM will not discipline parties for engaging in consensual sexual conduct that is revealed during the investigation solely because a Title IX complaint was filed or investigated.

The determination regarding responsibility becomes final either on the date that MSOM provides the parties with the written determination of the result of any appeal, or, if no party appeals, the date on which an appeal would no longer be considered timely.

Appeals:

Appeal Deadline: Parties have fourteen (14) days from the date of receipt of the written determination or dismissal to file an appeal.

MSOM will offer an appeal from a dismissal or determination whether Title IX Sexual Harassment occurred on the following bases:

- Procedural irregularity that affected the outcome;
- New evidence that would change the outcome and that was not reasonably available when the determination or dismissal was made; and
- The Title IX Coordinator, Investigator, or Decision Maker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome.

If a party appeals a dismissal or determination whether Title IX Sexual Harassment occurred, MSOM will:

- Notify the parties in writing of any appeal, including notice of the allegations, if notice was not previously provided to the respondent;
- Implement appeal procedures equally for the parties;
- Ensure that the Decision Maker for the appeal did not take part in an investigation of the allegations or dismissal of the complaint;
- Ensure that the Decision Maker for the appeal has been trained consistent with the Title IX regulations;
- Communicate to the parties in writing that MSOM will provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the outcome; and
- Notify the parties in writing of the result of the appeal and the rationale for the result.

Any additional procedures or bases for appeal MSOM offers will be equally available to all parties.

Informal Resolution:

In lieu of resolving a complaint through MSOM's Title IX grievance procedures, the parties may instead elect to participate in an informal resolution process at any time prior to reaching a determination regarding responsibility. MSOM will inform the parties in writing of any informal resolution process it offers

and determines is appropriate, if any. MSOM will not offer informal resolution to resolve a complaint in the following circumstances:

- Allegations that an employee sexually harassed a student (employee-on-student Sexual Harassment);
- Situations where federal, state, or local law prohibits informal resolution;
- Any case where the Title IX Coordinator determines that informal resolution would not adequately address the reported conduct or protect the safety of the campus community.

Before the initiation of an informal resolution process, MSOM will explain in writing to the parties:

- The allegations;
- The requirements of the informal resolution process;
- That either party may withdraw from the informal resolution process and resume the formal grievance procedures at any time before a resolution agreement is reached;
- That if the parties agree to a resolution at the end of the informal resolution process, it will be
 recorded in a written resolution agreement, and they cannot initiate or resume grievance
 procedures arising from the same allegations;
- The potential terms that may be requested or offered in an informal resolution agreement, including notice that an informal resolution agreement is binding only on the parties; and
- What information MSOM will maintain and whether and how MSOM could disclose such information for use in Title IX grievance procedures if such procedures are initiated or resumed.

Supportive Measures:

MSOM will offer and coordinate supportive measures as appropriate for the complainant and/or respondent to restore or preserve that person's access to the MSOM's education program or activity or provide support during MSOM's Title IX grievance procedures or during the informal resolution process. For complaints of Title IX Sexual Harassment, these supportive measures may include but are not limited to, "no contact" orders, referrals to campus and community services, change in reporting relationships, consideration of leave requests, academic support and/or assistance with academic petitions, modifications of work/class schedules, housing changes and changes in academic schedule. Other options may be considered as appropriate and feasible. Any remedies approved will be reviewed and modified as conditions warrant. All supportive measures are non-punitive and non-disciplinary and free of charge.

Disciplinary Sanctions and Remedies:

Disciplinary Sanctions

Following a determination that a respondent engaged in conduct constituting Title IX Sexual Harassment, MSOM may impose one or more of the following disciplinary sanctions, up to and including termination of employment or expulsion for students, as appropriate to the severity of the conduct and in accordance with institutional policies:

For Students:

- Verbal or written warning
- Mandatory educational or training programs
- Counseling or behavioral contracts
- No-contact directives or removal from specific programs or activities
- Probation (academic or disciplinary)

- Housing reassignment or loss of campus housing privileges
- Suspension (short-term or long-term)
- Expulsion (permanent dismissal from MSOM)

For Employees (Faculty or Staff):

- Verbal or written warning
- Mandatory training or coaching
- Modification of duties or reassignment
- · Loss of supervisory responsibilities
- Paid or unpaid suspension
- Demotion
- Termination of employment

Remedies

In addition to disciplinary sanctions, MSOM may implement remedies to restore or preserve a complainant's access to its education program or activity and to prevent the recurrence of harassment. Remedies are individualized, non-punitive, and designed to protect all parties. Examples include:

- Academic support measures (tutoring, extended deadlines, class adjustments)
- Modifications to class schedules or work assignments
- Housing changes or relocation of workspaces
- Counseling services or Employee Assistance Program referrals
- Permanent no-contact directives
- Monitoring of campus locations or activities
- Additional training or prevention programs for affected individuals or groups

Remedies will be coordinated by the Title IX Coordinator and implemented promptly following a determination of responsibility, and they may be provided regardless of whether a formal sanction is imposed on the respondent.