

INTERIM ANTI-SEX DISCRIMINATION (TITLE IX) POLICY

Approved by:	The President
History:	Issued: 6/18/1996
	Revised: 10/15/2010, 8/09/2018 (on interim basis), 8/14/2020 (on interim basis), 3/23/2022, 7/01/2022, 8/01/2024 (on interim basis), 5/29/2025 (on interim basis)
	Last Reviewed: --
Responsible University Office:	Title IX Office
Responsible Official(s):	Title IX Coordinator
Policy Category(ies):	Equity Affairs Human Resources Student Affairs

I. Purpose of Policy

Governors State University (the “University”) does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity that it operates, as required by state and federal law (including Title IX), including in admissions and employment.

The University is committed to maintaining a community in which students, faculty, and staff can work and learn together in an atmosphere free of all forms of unlawful sex discrimination and retaliation. Such misconduct violates the dignity of the individual and the integrity of the University as an institution of higher learning and, thus, will not be tolerated. The purpose of this Policy is to describe the University’s commitment to taking all appropriate steps to eliminate sex discrimination and retaliation, to prevent their recurrence, and to address their effects.

II. Scope and Application of Policy

A. Prohibition on Sex Discrimination and Sexual Harassment

This Policy prohibits all sex discrimination and sexual harassment occurring under the University’s education programs and activities in the United States. Conduct will be deemed to occur “under the University’s education programs and activities,” for purposes of this Policy, if it:

- (1) Occurs in or on property owned by the University;
- (2) Occurs at the location of, and during the course of, a University-sponsored program or activity operated on property not owned by the University;

- (3) Occurs in a building owned or controlled by a student organization that is officially recognized by the University; or
- (4) Is committed using the University's networking and computing resources covered by the University's Acceptable Use Policy for Computing and Networking, Network Security and Wireless Computing (Policy 64), or successor policy covering the same subject matter.

B. Support for Survivors of Sexual Violence

The University provides support services for survivors of sexual violence, dating violence, domestic violence, or stalking, as defined below, to University students and employees regardless of when and where the event occurred.

C. Relationship with Federal and State Law

This Policy does not replace federal and state mandated laws and regulations, and, where there is a conflict, the provisions of applicable law and regulations will govern.

D. Relationship with Other University Policies and Procedures

To the extent that the applicable scope of this Policy and the Procedures promulgated hereunder overlap with the applicable scope of any other University policy or procedure, this Policy and the relevant Procedures hereunder shall apply and control unless expressly stated otherwise.

III. Authority

Under University Board of Trustees Regulations § VIII.B.1.b, "The President shall develop policies and procedures to implement, monitor, and document the University's programs put into place to ensure compliance with applicable anti-discrimination and anti-retaliation laws, which shall take effect upon approval by the President." This Policy is adopted pursuant to that directive and authority.

Upon becoming effective, this Policy will replace and supplant all prior versions of the University's Policy 78 and all prior versions shall be deemed deprecated. Concurrent with this Policy becoming effective, all administrative procedures promulgated under the prior versions of the University's Policy 78 are withdrawn and revoked and henceforth deemed deprecated.

IV. Definitions

A. Sex Discrimination, Sexual Harassment, and Related Definitions

- (1) "Sex discrimination" means unlawful different treatment with respect to an individual's employment or participation in an education program or activity

based on that individual's actual or perceived sex. Sex discrimination includes sexual harassment.

- (2) "Sexual harassment" is a form of sex discrimination and means conduct on the basis of sex that constitutes one or more of the following:
- (i) An employee of the University conditioning the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct ("quid pro quo harassment");
 - (ii) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies an individual equal access to a University education program or activity ("hostile environment harassment"); or
 - (iii) One or more of the following specific offenses:
 - (a) "Sexual violence" meaning physical sexual acts attempted or perpetrated against an individual without that individual's consent or when that individual is incapable of giving consent, including without limitation rape, sexual assault, sexual battery, sexual abuse, sexual coercion, and all other offenses classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation;
 - (b) "Dating violence" meaning violence committed by an individual:
 - (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the individuals involved in the relationship.
 - (c) "Domestic violence" meaning felony or misdemeanor crimes committed by an individual who:

- (1) Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the State of Illinois, or a person similarly situated to a spouse of the victim;
 - (2) Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
 - (3) Shares a child in common with the victim; or
 - (4) Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the State of Illinois; or
- (d) “Stalking” meaning engaging in a course of conduct directed at a specific individual that would cause a reasonable person to:
- (1) Fear for the individual’s safety or the safety of others; or
 - (2) Suffer substantial emotional distress.
- (3) “Consent” means a freely, voluntarily, and knowingly given agreement to engage in sexual activity; and:
- (i) Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity.
 - (ii) Lack of verbal or physical resistance to or submission resulting from the use of force or threat of force does not constitute consent.
 - (iii) An individual’s manner of dress does not constitute consent.
 - (iv) An individual’s consent to past sexual activity does not constitute consent to future sexual activity. An individual’s consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another.
 - (v) An individual can and may withdraw consent at any time.
 - (vi) An individual cannot consent to sexual activity if that individual is unable to understand the nature of the activity or give knowing agreement due to circumstances such as, but not limited to: (a) the

individual is incapacitated due to the use or influence of alcohol or drugs, (b) the individual is asleep or unconscious, (c) the individual is underage, or (d) the individual is incapacitated due to a mental disability.

- (vii) When consent is withdrawn or can no longer be given, sexual activity must stop.

B. Additional Definitions

The following definitions also apply to this Policy:

- (1) “Aiding or facilitating” means when an individual or group of individuals promotes or encourages others to engage in certain conduct.
- (2) “Bystander” means an individual (other than a Confidential Employee, complainant, or respondent) who has or comes to have information about or related to conduct that reasonably may constitute sexual harassment under Title IX or this Policy, either through directly witnessing such conduct, learning of such conduct second-hand, or by virtue of their job duties for the University.
- (3) “Complainant” means an individual who is alleged to be the victim of conduct that could constitute sexual harassment and/or retaliation.
- (4) “Confidential Employee” means:
 - (i) The counselors and healthcare providers in the University’s Counseling and Wellness Center, with respect to information they receive while providing medical, mental health, and case management services;
 - (ii) Any other University employee whose communications are privileged or confidential under federal or state law, but only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies; or
 - (iii) A University employee who is conducting an Institutional Review Board-approved human-subjects research study designed to gather information about sexual harassment—but the employee’s confidential status is only with respect to information received while conducting the study.

- (5) “Disciplinary sanction” means a consequence imposed on a respondent determined, under this Policy and associated Procedures, to have violated this Policy and/or the University’s prohibitions on sexual harassment and retaliation.
- (6) “Formal complaint” means a document filed and signed by a complainant or signed by the Title IX Coordinator alleging sexual harassment or retaliation against a respondent and requesting that the University investigate the allegation(s) of sexual harassment or retaliation. The phrase “document filed and signed by a complainant” means a document or electronic submission (such as email or through an online portal provided for this purpose by the University) that contains the complainant’s physical or digital signature, or otherwise indicates that the complainant is the person filing the formal complaint.
- (7) “Party” means a complainant and/or a respondent.
- (8) “Preventing Sexual Violence in Higher Education Act” means the Illinois statute codified at 110 ILCS 155/1 *et seq.*, as it may be amended from time to time.
- (9) “Procedures,” as a capitalized term, means, generally, the administrative procedures promulgated in accordance with Section XIV of this Policy, as they may be approved and amended from time to time.
- (10) “Respondent” means a person who has been reported to be the perpetrator of conduct that could constitute sexual discrimination, including sexual harassment, and/or retaliation.
- (11) “Retaliation” means intimidation, threats, coercion, or discrimination against any individual for the purpose of interfering with any right or privilege secured by Title IX, the Preventing Sexual Violence in Higher Education Act, or this Policy; or because the individual has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, informal resolution process, or hearing under Title IX.
- (12) “Supportive measures” means non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge, to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed but such relief has been requested of the Title IX Coordinator. Such measures are designed to restore or preserve equal access to the University’s education programs and activities without unreasonably burdening the other party,

including measures designed to protect the safety of all parties or the University's educational environment, or deter sexual harassment.

- (13) "Survivor" means an individual who has experienced sexual violence, domestic violence, dating violence, or stalking, regardless of whether that individual also qualifies as a "complainant" under this Policy.
- (14) "Title IX" means, collectively, Title IX of the Education Amendments of 1972 (Pub. L. 92-318; 20 U.S.C. §§ 1681, 1682, 1683, 1685, 1686, 1687, 1688, 1689), and all regulations promulgated thereunder, including 34 C.F.R. Part 106, as amended effective 2020.

V. Prohibited Conduct

All sex discrimination, including sexual harassment, and retaliation are prohibited in any education program or activity operated by the University.

Engaging in sex discrimination or retaliation shall be a violation of this Policy. Conduct that results in any individual, on the basis of that individual's actual or perceived sex, being excluded from participation in, denied the benefits of, or subjected to discrimination under, any academic, extracurricular, research, occupational training, employment program or activity operated by the University, or in recruitment, hiring, promotion, renewal of employment, selection for training or apprenticeship, discharge, discipline, tenure, compensation, or in any other terms, conditions, or privileges of employment by the University, shall constitute "sex discrimination," and engaging in such conduct shall be a violation of this Policy. Further, engaging in any conduct that constitutes retaliation shall be a violation of this Policy. Aiding or facilitating sex discrimination or retaliation shall also be deemed a violation of this Policy.

The University reserves all rights to impose any appropriate and permissible disciplinary sanction against any person found to have violated this Policy pursuant to grievance procedures adopted pursuant to this Policy. For students of the University, violating this Policy may result in disciplinary sanctions up to and including suspension, dismissal, or expulsion as determined in the University's discretion. For employees of the University, violating this Policy may result in disciplinary sanctions up to and including suspension, discharge, or termination as determined in the University's discretion. For other persons, violating this Policy may result in disciplinary sanctions up to and including, bans, non-renewal of contract, and removal from and/or denial of entry to University property or events.

VI. Designation, Responsibilities, and Authority of Title IX Coordinator

A. Designation of a Title IX Coordinator

The President shall ensure that the University employes at least one employee who has been designated and authorized to serve as Title IX Coordinator, as that title is used for

purposes of Title IX, who shall not be biased for or against complainants or respondents generally or in a particular matter. If there should be a period when more than one employee has been designated and duly authorized to serve as Title IX Coordinator, the President, or their delegee, will designate one of the Title IX Coordinators to retain ultimate oversight over those responsibilities and ensure the University's consistent compliance with its obligations under Title IX and the Preventing Sexual Violence in Higher Education Act.

B. Authority of the Title IX Coordinator

As a general matter, the Title IX Coordinator shall be vested with the authority necessary: (1) to carry out the duties assigned to them by this Policy, all associated Procedures, the provisions of Title IX, and the provisions of the Preventing Sexual Violence in Higher Education Act; and (2) to enforce the provisions of this Policy and all Procedures.

The Title IX Coordinator is permitted to designate one or more employees as "Deputy Title IX Coordinators" to assist in coordinating the University's efforts to comply with its obligations under Title IX and the Preventing Sexual Violence in Higher Education Act. The Title IX Coordinator is also permitted to delegate any specific duties of their office to a Deputy Title IX Coordinator or any other appropriate University employee or outside contractor.

C. Responsibilities of the Title IX Coordinator

The University's Title IX Coordinator shall have the primary responsibility for coordinating the University's efforts to comply with its obligations under Title IX and the Preventing Sexual Violence in Higher Education Act. Neither the Title IX Coordinator nor any person to whom the Title IX Coordinator delegates any duty or obligation shall be biased for or against complainants or respondents generally or in any particular matter, nor shall they have any conflict of interest generally or in any particular matter. A party to a particular matter shall have an opportunity to object to the Title IX Coordinator or any delegee of the Title IX Coordinator pursuant to related Procedures based on actual or perceived conflict of interest or bias.

Duties of the Title IX Coordinator (or their delegee(s)) include:

- (1) Overseeing a training program or programs that satisfy the employee and student training requirements set out in Title IX and the Preventing Sexual Violence in Higher Education Act.
- (2) Maintaining one or more webpages, as part of the University's public website, on which the various policy(ies), procedure(s), and other pieces of information required by Title IX and the Preventing Sexual Violence in Higher Education Act are published and made accessible to the general public.

- (3) Subject to the President's approval, establishing and overseeing the University's procedures, processes, guidance, and/or infrastructure for making, accepting, and responding to reports of conduct that reasonably may constitute sexual harassment or retaliation.
- (4) Establishing and implementing the procedure(s) and process(es) for the prompt and equitable resolution of formal complaints of sexual harassment and retaliation.
- (5) Evaluating when to file a formal complaint of sexual harassment or retaliation when the subject of alleged misconduct does not wish to file and sign a formal complaint, taking into account the complainant's wishes and whether the circumstances are such that failure to do so would be clearly unreasonable.
- (6) Coordinating and overseeing the process for offering and implementing supportive measures, as appropriate, in accordance with Title IX and the Preventing Sexual Violence in Higher Education Act, taking into account the parties' wishes.
- (7) Coordinating the University's annual sexual misconduct climate survey for students as required pursuant to the Preventing Sexual Violence in Higher Education Act.
- (8) Chairing the University's Campus-Wide Task Force of Sexual Violence Prevention or otherwise coordinating the University's compliance with section 10 of the Illinois Campus Security Enhancement Act of 2008, 110 ILCS 12/10.
- (9) Ensuring the compilation and submission of the University's Preventing Sexual Violence in Higher Education Act Annual Report as required pursuant to section 9.21(b) of the Illinois Board of Higher Education Act, 110 ILCS 205/9.21(b).

VII. Publication of Notice of Nondiscrimination

The President (or their designee) shall create a notice of nondiscrimination by the University, as contemplated by Title IX, to be provided to all University students, employees, applicants for admission or employment, and all unions and professional organizations holding collective bargaining or professional agreements with the University. The President (or their designee) shall ensure such notice of nondiscrimination is distributed and published as required by Title IX.

VIII. Reporting and Notification Requirements for University Employees

A. Reporting Requirements for Responsible Employees

Any University employee, who is not a Confidential Employee or the intended target of sexual harassment, **must** notify the Title IX Coordinator promptly when the employee has information about conduct that reasonably may constitute sexual harassment under Title IX or this Policy. An employee who is required to report under this paragraph A (*i.e.*, any employee who is not a Confidential Employee) is herein referred to as a “Responsible Employee.”

The Title IX Coordinator shall notify Responsible Employees how they can make reports to satisfy this requirement. The duty to notify the Title IX Coordinator is personal to each Responsible Employee and is not satisfied merely by telling the information to a supervisor or assuming someone else has notified the Title IX Coordinator.

Where a complainant is a minor, the Responsible Employee also may have a duty to notify the Department of Child and Family Services (DCFS) of abuse or neglect. Notifying the Title IX Coordinator does not absolve any Responsible Employee of this additional duty.

B. Notification Requirements for Confidential Employees

Confidential Employees must explain to any individual who informs the Confidential Employee of conduct that reasonably may constitute sexual harassment under Title IX or this Policy:

- (1) The employee’s confidential status for purposes of this Policy, including the circumstances in which the employee is not required to notify the Title IX Coordinator about conduct that reasonably may constitute sexual harassment; and
- (2) How to contact the Title IX Coordinator.

IX. Reporting Options for Complainants and Student Bystanders

The University will make available methods by which complainants and student bystanders may report possible instances of sexual harassment. Such methods will include, but are not limited to, options for electronic reports and anonymous reports.

The Title IX Coordinator will publicize the available reporting options appropriately. Procedures and/or other material(s) from the Title IX Coordinator shall provide guidance to complainants and student bystanders on making reports.

As a means of removing barriers to reporting, the University will generally offer any student, whether the complainant or a bystander, who reports conduct that reasonably

may constitute sexual harassment, limited immunity from being charged for policy violations related to the personal use of alcohol or other drugs, provided that any such violations did not and do not place the health and safety of another individual at risk. The University reserves the right to require those individuals to engage in educational or therapeutic remedies.

X. Addressing Sex Discrimination Beyond Sexual Harassment

The University's provisions, procedures, and requirements with respect to: (A) making reports and filing complaints about, (B) investigating, (C) adjudicating, (D) sanctioning, and (E) alleviating and remedying forms of sex discrimination that do not constitute sexual harassment for purposes of this Policy shall be governed by the University's general anti-discrimination and anti-harassment policy, **Policy 52**, and applicable administrative procedures associated with Policy 52.

XI. Supportive Measures

The Title IX Coordinator (or delegee(s)) must ensure that supportive measures (as defined for purposes of this Policy) are promptly and effectively offered to and coordinated for, as appropriate:

- (1) Complainants upon the Title IX Coordinator's receipt of a report of conduct that reasonably may constitute sex discrimination under Title IX or this Policy; and
- (2) Respondents during the resolution of complaints of sex discrimination.

Further details about the processes for offering, coordinating, modifying, and terminating supportive measures will be prescribed by Procedures that meet the applicable requirements of Title IX and the Preventing Sexual Violence in Higher Education Act.

XII. Training

A. Training for Employees

The Title IX Coordinator (of their delegee) shall oversee the appropriate training of all employees who participate in the University's processes for receiving, responding to, and investigating, adjudicating, or otherwise resolving formal complaints in accordance with the requirements of Title IX and the Preventing Sexual Violence in Higher Education Act, and any other relevant law or regulation.

B. Training for Students

The Title IX Coordinator (or their delegee) shall also oversee, and students shall participate in, a student training program related to sexual assault awareness and

prevention that satisfies the requirements of the Preventing Sexual Violence in Higher Education Act and any other relevant law or regulation.

XIII. Survivor Support Services and Primary Prevention and Awareness Programming

A. Support Services for Survivors

The Title IX Coordinator, Human Resources Department, and Student Affairs Department shall collectively ensure that appropriate support services are made available to employee and student survivors, regardless of where the sexual violence, domestic violence, dating violence, or stalking occurred, and that information about such support services, whether provided on campus or by off-campus community partners, is reasonably accessible to employees and students. Such support services may include, but would not necessarily be limited to:

- (1) Access to counseling services;
- (2) Access to trained confidential advisors (who are not Responsible Employees) to provide emergency and ongoing support to survivors of sexual violence, dating violence, domestic violence, and stalking;
- (3) Contact information for community-based sexual assault crisis center(s), community-based domestic/dating violence agency(ies); other community-based support service(s) and center(s), and local law enforcement agencies;
- (4) Assistance, upon the survivor's request, in notifying law enforcement regarding incidents of sexual violence, dating violence, domestic violence, and stalking;
- (5) Assistance, upon the survivor's request, in accessing and navigating campus and local health and mental health services, counseling, and advocacy services;
- (6) Honoring orders of protection or no contact orders entered by a State civil or criminal court.

Such support services are to be in addition to, not in place of, any supportive measures that may appropriately be offered to, and implemented for, a complainant under Section XI.

B. Sexual Violence Primary Prevention and Awareness Programming

The Title IX Coordinator (or their delegee(s)) shall coordinate with other appropriate University departments and offices for the University's provision of sexual violence

primary prevention and awareness programming for all students who attend one or more classes on campus (and which may also be open to employees and other members of the community). Such programming may include, but would not necessarily be limited to, poster and flyer campaigns, electronic communications, group activities, art and other installations, films, guest speakers, symposia, conferences, seminars, panels, discussion groups, and other strategies designed to communicate the prevalence of sexual violence, domestic violence, dating violence, and stalking, and/or intended to prevent sexual violence, domestic violence, dating violence, and stalking before they occur.

XIV. Administrative Procedures

As the President's delegee, the Title IX Coordinator shall promulgate administrative procedures to effectuate this Policy and the University's compliance with Title IX and the Preventing Sexual Violence in Higher Education Act.

A. Compliance Procedures

The Title IX Coordinator (or their delegee) shall promulgate administrative procedures that cover, but are not necessarily limited to, the following subjects:

- (1) Reporting conduct that reasonably may constitute sexual harassment, including reporting methods for students and employees.
- (2) Responding to reports of potential sexual harassment, including: (a) supportive measures; and (b) emergency removals and administrative leaves.
- (3) Recordkeeping related to: (a) responses to reports of sexual harassment; (b) resolution of formal complaints of sexual harassment; and (c) training materials.
- (4) Aid, benefits, or services not provided by the University but in which any applicant, student, or employee may be required to participate (if any).

At their discretion, the Title IX Coordinator (or their delegee) may promulgate administrative procedures for a program of "informal" or "voluntary" resolution of formal complaints of sexual harassment that meets the requirements of Title IX so long as such procedures are not used where an allegation of sexual harassment would, if true, constitute sexual harassment of a University student by a University employee.

B. Grievance Procedures for Complaint Resolution

The Title IX Coordinator (or their delegee) shall promulgate administrative procedures prescribing processes for making and resolving formal complaints of sexual harassment and retaliation. The processes shall cover matters such as personnel, investigations, dismissals, hearings, decisions, disciplinary sanctions, equitable treatment of parties, and

appeals. The procedures shall satisfy the various requirements imposed by Title IX (which requires the University to adopt “grievance procedures”) and the Preventing Sexual Violence in Higher Education Act. The burden of proof in any grievance proceeding shall be borne by the University and not any party. The burden of proof shall be the “preponderance of the evidence” standard.

XV. Failure to Comply with Policy

It is imperative that University employees fulfill their responsibilities under Title IX and the Preventing Sexual Violence in Higher Education Act. Accordingly, it shall be a violation of this Policy for a University employee:

- (1) To fail to complete the required any Title IX/Preventing Sexual Violence in Higher Education Act training directed by the Title IX Coordinator;
- (2) To fail to meet their reporting and/or notification requirements described in Section VIII;
- (3) Other than a complainant or respondent, to fail to cooperate with a complaint resolution process in accordance with the applicable grievance procedures promulgated under Section XIV; or
- (4) To fail to implement any supportive measures or remedies as directed by the Title IX Coordinator (or their delegee).

Committing any of the violations described in this Section XV may subject an employee to discipline.

It shall be a violation of this Policy for a student to fail to complete the required sexual assault awareness and prevention training described in Section XII as directed by the Title IX Coordinator. Such a violation may subject a student to a “registration hold” on their account with the Registrar’s Office and/or to discipline.

It shall also be a violation of this Policy for any individual to knowingly submit a false report regarding alleged sexual harassment or retaliation or to make a frivolous formal complaint of sexual harassment or retaliation. Committing such offense may subject the reporter/complainant, if an employee or student, to disciplinary action, up to and including suspension, dismissal, or termination. False reports and frivolous complaints refer to cases where a reporter/complainant lacks a good faith belief that sexual harassment or retaliation might have occurred. This provision does not apply to reports and complaints made in good faith, even if the facts alleged in the report or complaint are not ultimately substantiated during a complaint resolution process or other investigation.

Further, any employee or student who is later proven to have intentionally given false or misleading information during the course of a complaint resolution process under the

University's grievance procedures may be subject to disciplinary action, up to and including termination or dismissal. However, the University will not discipline a party, witness, or others participating in a complaint resolution process under the University's grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the University's determination whether sexual harassment occurred.

XVI. Privacy and Confidentiality

The University is committed to protecting the privacy of survivors, complainants, and respondents brought to the attention of the University pursuant to the implementation of this Policy and the Procedures. The University will disclose the personally identifiable information and other sensitive information about such individuals only as allowed by law. Under certain circumstances, disclosure of such information may be required by law, in which cases, the University will make all mandatory disclosures. For example:

- (1) If a report of sexual harassment discloses the abuse of a minor, the University (and all University employees with knowledge) shall comply with the Illinois Abused and Neglected Child Reporting Act, 325 ILCS 5;
- (2) If a report of sexual harassment or retaliation discloses an immediate threat to the University community, the University will notify law enforcement as appropriate and issue a timely warning or emergency notice of the incident in the interests of community health and safety or as otherwise required by University obligations, such as the federal Jeanne Clery Campus Safety Act, 20 U.S.C. § 1092(f) and 34 C.F.R. § 668.46; and
- (3) The University will comply with valid subpoenas, court orders, and government agency orders as required by law.

Further, to the extent the disclosure of information related to or obtained during the course of receiving and responding to reports of sexual harassment, offering and implementing supportive measures, providing support services to survivors, and resolving complaints pursuant to grievance procedures is allowed (but not required) by law, the University intends to maintain the confidentiality of such processes, proceedings, and procedures to the extent it can do so while still carrying out such processes, proceedings, and procedures.

Privacy protections and confidentiality considerations will be included in all Procedures as necessary and appropriate.

=====**END OF POLICY TEXT**=====

The foregoing Policy has been recommended and approved for adoption, on an interim basis as described therein, as follows:

RECOMMENDED: /s/ Kaitlyn Anne Wild
Kaitlyn Anne Wild, Director of
Compliance & Title IX Coordinator

DATE: 5/23/2025

APPROVED: /s/ Corey S. Bradford, Sr.
Corey S. Bradford, Sr., Ph.D.,
Interim President

DATE: 5/29/2025

(Copy of Policy with original signature is available upon request.)