

Touro College
Title IX Policies and Procedures

Title IX Coordinator

The Touro College Title IX Coordinator is responsible for coordinating the efforts of the College to comply with Title IX. The current Title IX Coordinator for the College is:

Roberta Jackson

Title IX Coordinator

Touro College

23 West 23rd Street, Fifth Floor

212.463.0400 x5163

Students, faculty, and staff may contact the Title IX Coordinator's Office to inquire about their rights under the College's policies, request mediation or counseling, or seek information about filing a complaint.

Policy

Title IX protects against discrimination and harassment on the basis of sex. Touro College will not tolerate sex discrimination or harassment of applicants, students or employees, by students, faculty, staff, administrators contractors or others working for or with the College.

Likewise, the College will not tolerate any form of retaliation against any applicant, student or employee for reporting discrimination or harassment or assisting in the investigation of a discrimination or harassment complaint.

This policy will be posted on line as well as referenced in all handbooks and bulletins.

IMPORTANT DISCLAIMER

This Policy does not form a contract. Touro College reserves the right to amend, modify, supplement or revoke this policy, in whole or in part, at any time with or without notice in its sole discretion. This policy is neither written nor meant to confer any rights or privileges on a student, staff or faculty or impose any obligations on Touro College other than its obligations under the law. As with all Touro College handbooks, rules and policies, this policy is written for informational purposes only, may contain errors and may not be applicable to every situation or circumstance. Any dispute, claim or controversy arising out of or related to this policy, which is not resolved through Touro College's internal procedures (hereinafter, "Disputes"), shall be resolved exclusively through final and binding expedited arbitration conducted solely by the American Arbitration Association ("AAA"), or any successor in interest, in accordance with the AAA Rules then in effect. The location of the arbitration shall be at a convenient office on the Touro College campus where the student, staff or faculty member is (or was last) affiliated.

Definitions

For purposes of these policies and procedures, discrimination and harassment are defined as follows:

DISCRIMINATION

Discrimination is defined as:

- treating members of one gender less favorably because of their gender; or
- having a policy or practice that has a disproportionately adverse impact on one gender, unless justified by business necessity or as necessary to retain academic integrity.

SEXUAL HARASSMENT

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment; or
- submission to or rejection of such conduct by an individual is used as the basis for academic or employment decisions affecting that individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's academic performance or employment or creating an intimidating, hostile, demeaning, or offensive employment, academic or living environment.

Consensual, romantic relationships between faculty or other employees and students are generally not considered sexual harassment and are not prohibited by College policy. Individuals should be aware, however, that these relationships may give the appearance of impropriety and are susceptible to being characterized as non-consensual, and even coercive, if there is an inherent power differential between the parties. Allegations of harassment or discrimination, regardless of origin, will be investigated in a prompt and thorough fashion

Discrimination and Harassment Grievance Procedures

All members of the College community are expected to adhere to the applicable policies and to cooperate with the procedures for responding to complaints of discrimination and harassment. All are encouraged to report any conduct believed to be in violation of these policies.

Any person who believes that he or she has been the subject of sexual harassment or discrimination may initially choose to deal with the alleged offender directly through a face-to-face discussion, a personal telephone conversation, e-mail correspondence, or letters. In some cases this may effectively resolve the situation. However, individuals are not required to address the individual directly before bringing the matter to the attention of the College.

Grievances

Applicants, students and employees who believe they have been sexually harassed or discriminated against on the basis of sex (whether by students, faculty, staff, administrators,

contractors or others) should contact the office of the Title IX Coordinator. The office of the Title IX coordinator will, by itself or in conjunction with another appropriate office (e.g., a Dean of Students office, the Human Resources department), conduct a prompt and thorough investigation of any sexual harassment or discrimination complaint, interviewing the complaining student or applicant and other witnesses as needed. The investigation will be kept as confidential as is feasible in light of the duty of the College to review and address sexual harassment and other forms of sex discrimination. Ordinarily, the office of the Title IX Coordinator will endeavor to interview the complaining party, to obtain detailed information, within one week of receiving an initial complaint from that individual. Other witnesses will be interviewed and any other information will be gathered promptly, usually within three weeks after the initial interview with the complaining party. When the investigation is completed, the College will take any corrective action needed to prevent a recurrence and to correct any discriminatory effects. The office of the Title IX Coordinator will decide what corrective action, if any, should be taken. Ordinarily, investigations will be completed within about one month after the initial interview of the complaining party and a determination as to what corrective action will be taken will ordinarily be made within about one week thereafter. The Office of the Title IX Coordinator will then notify the complaining party (within about 10 days after the determination is made) that the investigation has been completed and explain what corrective action, if any, will be taken.

The College will not tolerate any form of retaliation against any applicant, student or employee who reports sexual harassment or discrimination or who participates in any investigation of sexual harassment or discrimination. Any applicant, student or employee who believes he or she has been the victim of retaliation, should contact the office of the Title IX Coordinator.

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