

**POLICY FOR THE PREVENTION OF AND RESPONSE TO
SEX DISCRIMINATION, SEXUAL HARASSMENT,
SEXUAL VIOLENCE, RELATIONSHIP VIOLENCE, AND STALKING**

(POLICY UNDER TITLE IX AND N.Y. EDUCATION LAW ARTICLE 129-B)

To the extent that this Policy overlaps with the University's Non-Discrimination, Anti-Harassment, and Anti-Retaliation Policy, this Policy will control in cases involving sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking involving a student.

POLICY STATEMENT

The Rockefeller University (the "University") is committed to maintaining an educational environment for its students that is free from sex discrimination, sexual harassment, sexual violence, relationship violence, and stalking. The University does not discriminate on the basis of sex in its education programs and activities, in compliance with the law, including Title IX of the U.S. Education Amendments of 1972 and Article 129-B of the N.Y. Education Law.

The University strongly encourages every member of our community who is a victim of, or has knowledge of, sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking involving a student to report that conduct as set forth below. The University is committed to responding to such reports promptly, with sensitivity for all concerned, and with fair and equitable process.

CONTROLLING LAW

Title IX of the U.S. Education Amendments of 1972, 20 U.S.C. §1681 et seq., provides:

"No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

The federal government has determined that sex discrimination, sexual harassment, and sexual violence may create a "hostile environment," thereby denying a victim of such conduct the benefits of an education program or activity.

Article 129-B of the N.Y. Education Law also provides protections for students who are the victims of sexual assault, relationship violence, and stalking, including the right to report the incident to the University or law enforcement, to be protected by the University from retaliation for reporting an incident, and to receive assistance and resources from the University.

DEFINITIONS

Affirmative Consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression.

Consent may be given initially but withdrawn at any time, and consent to one sexual act does not necessarily constitute consent to any other sexual act. Consent is required regardless of whether the person initiating the act is under the influence of drugs and/or alcohol. Consent cannot be given by a person who is incapacitated, which occurs when an individual lacks the ability to knowingly choose to participate in sexual activity, and consent cannot be given when it is the result of any coercion. When consent is withdrawn or can no longer be given, sexual activity must stop.

A **Hostile Environment** is created when prohibited conduct is sufficiently severe or pervasive as to limit or deny a student's ability to participate in or benefit from the University's educational programs or activities.

Relationship Violence, including dating violence and domestic violence, is a pattern of behavior in which an individual uses physical violence, coercion, threats, intimidation, isolation, or other forms of emotional, sexual, verbal, and/or economic abuse to control his or her current or former intimate partner.

A **Responsible Employee** is an employee who has the authority to take action to redress conduct prohibited under this Policy, or who has a duty to report such conduct to the Title IX Coordinator, or who a student could reasonably believe has this authority or responsibility. Responsible Employees include: Heads of Laboratories (who may be HHMI employees); the Department Heads of the Dean's Office, Human Resources, Office of General Counsel, Housing, and Security; and from the Dean's Office, Emily Harms, Senior Associate Dean; Andrea Morris, Director of Career and Professional Development; Marta Delgado, Senior Graduate Program Administrator of Finance and Student Affairs; and Kristen Cullen, Graduate Admissions Administrator and Registrar.

Sex Discrimination is conduct towards an individual, based upon that individual's sex, gender, or sexual orientation, that denies the individual the benefits of, treats the individual differently, or otherwise adversely affects a term or condition of an individual's employment, education, living environment, or participation in a University program or activity.

Sexual Harassment is unwelcome conduct of a sexual nature. It may include, but is not limited to: unwelcome sexual advances or requests for sexual favors; sexual jokes or innuendoes; verbal abuse of a sexual nature; commentary about an individual's body,

sexual prowess, or sexual deficiencies; leering or catcalls; inappropriate touching; insulting or obscene comments or gestures; display or circulation (including through email) in the workplace of sexually suggestive objects or pictures; or other physical, verbal, or visual conduct of a sexual nature that has the effect of creating a hostile environment.

Sexual Violence or sexual assault is an actual or attempted physical sexual act performed against a person's will or without a person's affirmative consent, including where the person is incapable of giving consent due to a disability or the use of drugs and/or alcohol.

Stalking is when a person engages in a course of conduct toward another person under circumstances that would cause a reasonable person to fear bodily injury or experience substantial emotional distress. Course of conduct means two or more acts including but not limited to unwelcome acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, and/or communicates with a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish. The definition includes cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, and/or other similar devices or forms of contact are used.

The **Alleged Victim** as used in this policy refers to a student who is a victim of sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking by an **Accused**. A **Complainant** is an alleged victim who reports such conduct to the Title IX Coordinator or a responsible employee. A **Reporting Individual** is an individual who reports a violation and may be a Complainant or another individual.

INDIVIDUALS AND CONDUCT COVERED

This Policy covers any occurrence of sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking involving a student, regardless of whether the accused is a student, employee, or third party, or whether the prohibited conduct occurred on or off campus. The University must address reported sex discrimination, sexual harassment, sexual violence, relationship violence, or stalking involving a student whether the report (oral or written) is made by the alleged victim or a reporting individual other than the alleged victim.

The University also must ensure that a student who is the victim of sexual violence, relationship violence, and/or stalking is afforded the protections outlined in the Students' Bill of Rights Relating to Sexual Violence, Relationship Violence, and/or Stalking, including the right to make a report to local law enforcement and to be protected from retaliation. (See Bill of Rights at the end of this Policy.)

THE TITLE IX COORDINATOR

The Rockefeller University has designated as its Title IX Coordinator Virginia Huffman, Vice President, Human Resources. Virginia Huffman's contact information is: Founders Hall, Room 103; tel: 212-327-7261; email: huffman@rockefeller.edu.

The Title IX Coordinator oversees implementation of this University Policy and must be informed of all reports and complaints of sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking involving a student, even if the report or complaint was initially made to another individual or if the investigation will be conducted by another individual or office.

The Title IX Coordinator is responsible for:

- Activating the University's Title IX fact-finding, hearing, and determination procedures;
- Evaluating confidentiality requests;
- Conducting and/or managing an investigation and appeal, including designating other University employees or third parties to assist, as needed;
- Determining appropriate interim measures for a complainant and the accused, including providing support and counseling resources, and taking steps to protect public safety during the course of an investigation;
- Determining appropriate sanctions against an individual who has been found to have violated this Policy and remedies for the complainant;
- Enforcing sanctions with the assistance of University administrative leadership; and
- Recommending changes to University policies or procedures, as needed.

PRIVACY AND CONFIDENTIALITY

Privacy will be maintained throughout the investigation of a complaint or report of sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking, consistent with reasonable investigation and appropriate corrective action. Certain University personnel (including responsible employees), because of their duty to report conduct prohibited under this Policy to the Title IX Coordinator or take action to redress such conduct, cannot guarantee confidentiality but will maintain the privacy of the complainant or reporting individual, to the greatest extent possible. These University personnel will share a complaint or report only as necessary for the Title IX Coordinator to investigate and/or seek a resolution and, if required, with law enforcement.

A complainant may request (1) that his or her name not be revealed to the accused, and/or (2) that the University not investigate or take action. The University will strongly support such a request, although honoring the request may limit the University's ability to investigate and respond fully to the incident. The Title IX Coordinator will determine

whether the University can honor a request for confidentiality by a complainant or a reporting individual while still providing a safe and nondiscriminatory environment for all students. A request not to investigate or take action may not be honored if such action might put other individuals at risk. Factors to consider in determining whether to honor a request include whether: (a) the accused has a history of violent behavior or is a repeat offender; (b) the incident represents an escalation in unlawful conduct on behalf of the accused from previously noted behavior; (c) there is an increased risk that the accused will commit additional acts of violence; (d) the accused used a weapon or force; (e) the reporting individual is a minor; and (f) the University has other means to obtain evidence such as security footage, and (g) that information reveals a pattern of perpetration at a given location or by a particular group. If the University determines that an investigation is required, it will notify the complainant and take immediate action as necessary to protect or assist the complainant.

Certain individuals are confidential resources and will maintain the confidentiality of information provided to them by a complainant, accused, or reporting individual. Confidential resources under this Policy are: licensed mental health counselors, advocates, and health care professionals, including those at the University's Occupational Health Services. These confidential resources are not required or permitted to disclose any identifying information regarding an incident under this Policy to any outside party, including other individuals at the University, unless the person who provided information to them has consented to disclosure. If the accused is a University employee, the complainant may notify the University's Human Resources and/or has the right to request that a confidential resource assist in reporting to the Title IX Coordinator.

If an individual wishes to make an anonymous report, the below hotlines are completely confidential and available at all times (24 hours/7 days per week):

- New York State Domestic and Sexual Violence Hotline: 800-942-6906;
- New York State Office of Victim Services: 800-247-8035 or www.ovs.ny.gov;
- and
- Safe Horizon's Rape/Sexual Assault and Domestic Violence Hotline: 800-621-HOPE (4673).

PROCEDURAL REQUIREMENTS

A complaint or report under this Policy should be reported to the Title IX Coordinator. Complaints or reports also may be reported to the University's Director of Security, James K. Rogers (Nurses Residence, 1st Floor; tel: 212-327-7339; email: jrogers@rockefeller.edu), who will provide the complaint or report to the Title IX Coordinator. Responsible Employees have an obligation to notify the Title IX Coordinator of any complaints or reports under this Policy.

If the complainant and the accused voluntarily agree to participate in an informal process, such as a mediation, and the University determines that an informal process is appropriate, the Title IX Coordinator may assist the complainant and the accused to reach

a voluntary resolution. The complainant will not be required to resolve the problem directly with the accused and may end the informal process at any time.

A complainant has the right to file a criminal complaint at any time, before, during, or after (i) reporting a Title IX complaint, or (ii) activating the University's internal Title IX investigation or appeal process.

An impartial and equitable investigation of a complaint or report under this Policy will be undertaken, taking into consideration any request by the complainant or reporting individual for confidentiality, in accordance with the following procedures:

1. The investigation may include fact-finding, a hearing, where appropriate, and any other decision-making processes useful in determining whether the alleged sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking occurred and created a hostile environment.
 - a. During the course of the investigation, the complainant and the accused must be afforded a meaningful opportunity to be heard and have the same opportunities:
 - i. to receive written or electronic notice of any meeting they are required to or are eligible to attend;
 - ii. to receive written or electronic notice setting forth the date, time, location, and factual allegations concerning the violation (as alleged by a complainant or a reporting individual); a reference to the specific University policy alleged to have been violated; and sanctions that may be imposed;
 - iii. to present witnesses and evidence;
 - iv. to timely receive from the University relevant information that will be used in the investigation process;
 - v. to attend any hearings, although the complainant and the accused will not be required to be in the same room at the same time and will not be permitted to directly cross-examine each other; and
 - vi. to make an impact statement at the point of the investigation process where the decision maker is deliberating on appropriate sanctions.
 - b. Throughout the investigative process (and appeal, if any), the complainant and the accused each may seek the advice of an advisor (or personal attorney), who may be present during any fact-finding process, including a hearing, but may not pose questions to or respond to questions for the complainant or the accused.

- c. The applicable legal standard used in resolving the complaint is a “preponderance of the evidence,” which means that the finder(s) of fact concludes that it is more likely than not that conduct in violation of this Policy occurred (or did not occur).
2. Prior to and during an investigation, the University will promptly take interim steps to ensure equal access to its education programs and activities and protect the complainant, as necessary, from the alleged conduct.
3. The complainant and the accused also should receive periodic updates on the status of an investigation.
4. The complainant and the accused will be notified simultaneously in writing of the outcome of the investigation and the rationale for the outcome, as follows:
 - a. The complainant must be informed of whether the investigation resulted in a finding that the alleged conduct occurred and, if so, any remedies offered to the complainant, sanctions imposed on the offender as a consequence of the findings, with the rationale for the sanctions, and efforts by the University to eliminate any hostile environment and prevent its recurrence.
 - b. The accused should be notified of the same information as the complainant, but not information regarding any remedies offered to the complainant.
5. The investigative and decision-making activities described above should be completed in a timely manner and if practicable, within sixty (60) calendar days of a complaint being received by the Title IX Coordinator.
6. The complainant and the accused may appeal the outcome of an investigation. The exclusive grounds on which an appeal may be submitted are the following: (a) a violation of relevant University procedures that significantly affected the outcome; (b) the discovery, after the outcome, of relevant evidence that would significantly affect the outcome and that was previously unavailable despite diligent efforts to obtain such evidence; or (c) sanction(s) that are substantially disproportionate to the findings. An appeal is not a new fact-finding process. An appeal should be initiated promptly, and in any event within ten (10) calendar days of the issuance of notice of the outcome, following an investigation. The appeal must be in writing, set forth the grounds and supporting facts for the appeal, and be received by the Title IX Coordinator within the applicable ten (10) calendar day period. The appeal will be considered by an appeal panel. The same process will be followed whether the complainant or the accused seeks to appeal; the appeal process will be completed in a timely manner and if practicable, within sixty (60) calendar days from the Title IX Coordinator’s receipt of an appeal; and both parties will be notified in writing of the outcome of the appeal.
7. The University will undertake any necessary actions to eliminate any hostile environment and prevent the recurrence of sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking.

RETALIATION IS PROHIBITED

The Rockefeller University prohibits retaliation against any individual who reports sex discrimination, sexual harassment, sexual violence, relationship violence, and/or stalking, or participates in an investigation of such report. Retaliation against such individual will be subject to disciplinary action.

AMNESTY POLICY FOR ALCOHOL AND/OR DRUG USE BY REPORTING INDIVIDUALS

The health and safety of every student at the University is of utmost importance. The University recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that violence, including but not limited to sexual violence, relationship violence, and/or stalking, occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. The University strongly encourages students to report sexual violence, relationship violence, and/or stalking to University officials. A bystander or a complainant who acting in good faith reports or discloses any incident of sexual violence, relationship violence, and/or stalking to University officials or law enforcement will not be subject to disciplinary action for violation of the University's Substance Abuse Policy occurring at or near the time of the commission of the reported incident.

UNIVERSITY STUDENTS' BILL OF RIGHTS RELATING TO SEXUAL VIOLENCE, RELATIONSHIP VIOLENCE, AND/OR STALKING

All University students have the right to:

1. Make a report to local law enforcement and/or state police;
2. Have disclosures of sexual violence, including domestic violence, dating violence, stalking, and sexual assault, treated seriously;
3. Make a decision about whether or not to disclose a crime and/or violation and to participate in the University's investigation, hearing, and/or decision-making process and/or criminal justice process free from pressure by the University;
4. Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard;
5. Be treated with dignity and receive from the University courteous, fair, and respectful health care and counseling services, where available;
6. Be free from any suggestion that the complainant or reporting individual is at fault when these crimes and/or violations are committed, or should have acted in a different manner to avoid such crimes and/or violations;
7. Describe the incident to as few University representatives as practicable and not be required to unnecessarily repeat a description of the incident;

8. Be protected from retaliation by the University, any University employee, personnel, and/or student; and/or the accused and/or their friends, family, and acquaintances within the jurisdiction of the University;
9. Have access to at least one level of appeal of a determination;
10. Be accompanied by an advisor of choice who may assist and advise a complainant, reporting individual, or accused throughout the investigation, hearing, and/or decision-making process, including during all meetings and hearings related to such process; and
11. Exercise civil rights and practice of religion without interference by the investigation, hearing, and/or decision-making process of the University.

Additional information and guidance concerning these rights and implementing procedures is set forth in the attached University's Guidelines and Implementing Procedures.

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Questions regarding Title IX may be referred to the University's Title IX Coordinator or to the Office for Civil Rights (OCR), U.S. Department of Health and Human Services.

GUIDELINES AND IMPLEMENTING PROCEDURES

These guidelines and implementing procedures provide additional information and guidance concerning University students' rights and the University's procedure for responding to complaints or reports under the attached Policy, available resources, protections and accommodations, procedural rights, and sanctions.

Response to Complaints or Reports

In addition to the rights set forth in the Policy, a University student who has been a victim of sexual violence, relationship violence, and/or stalking has the right to:

- Notify University security and/or local law enforcement about the incident;
- Have emergency access to the Title IX Coordinator (Virginia Huffman) and/or the Director of Security (James K. Rogers). Contact information for these individuals is as follows:

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| Virginia Huffman Title IX Coordinator Vice President, Human Resources | Founders Hall, Rm 103 Tel: 212-327-7261 Email: huffman@rockefeller.edu |
| James K. Rogers Director of Security | Nurses Residence, 1 st Floor Tel: 212-327-7339 Email: jrogers@rockefeller.edu |

These individuals will offer information about a student's rights and options for proceeding, available resources and assistance, and where applicable, the importance of preserving evidence and obtaining a sexual assault forensic examination as soon as possible. These individuals will explain that they can offer the student privacy, if not confidentiality, and will inform the student of other reporting options. They will also offer a student information and assistance with filing a report, and will advise that the criminal justice process utilizes different standards of proof and evidence than the University's investigation process. Questions about whether a specific incident violated the State's criminal law should be addressed to law enforcement or the district attorney;

- File a report of sexual violence, relationship violence, and/or stalking with the University. Reports will be investigated in accordance with the Policy;
- Receive assistance from the Director of Security (James Rogers) or his designee in initiating legal proceedings in family court or civil court; and
- Request, at any time, the withdrawal of a complaint or further involvement with the University's investigation process.

The following information will be given to a reporting individual at the first instance of disclosure of sexual violence, relationship violence, and/or stalking:

You have the right to make a report to University Security, local law enforcement, and/or state police; or choose not to report; to report the incident to the University; to be protected by the University from retaliation for reporting an incident; and to receive assistance and resources from the University.

It should be noted that if an individual discloses information through a public awareness event, such as candlelight vigils, protests, or other public event, the University is not required to begin an investigation based on such information (unless requested to do so by the individual), although the University may use the information to inform its education and prevention efforts.

Resources Available to University Students

It is important for a victim of sexual violence to seek immediate and appropriate medical assistance and treatment as needed. In the course of treatment, it is important to preserve evidence that may be necessary to prove the reported conduct occurred or to obtain an order of protection.

The University's on-campus Occupational Health Service (OHS) is available free of charge to all University students.

- OHS is staffed by nurse practitioners and a certified occupational health nurse who offer confidential, basic medical advice, or first aid care when such treatment is necessary in advance of a student receiving private medical attention.
- OHS also has on-campus a Weill Cornell Medicine psychiatrist who offers confidential counseling and help in finding appropriate mental health care providers within the University's healthcare networks.

OHS is open Monday through Friday, 9 a.m. to 5 p.m. and is located in The Rockefeller University Hospital, Room 118; tel: 212-327-8214. While OHS staff are unable to perform procedures related to the collection of evidence for the purpose of pursuing a criminal action, they can provide assistance and support when an individual requests or requires transportation to a full service hospital.

Across the street from the University is New York Presbyterian Hospital – Weill Cornell Medicine, which has a New York State-designated Sexual Assault Forensic Examiner (SAFE) Program and provides specialized care to victims of sexual assault or sexual violence.

In addition, the Employee Assistance Program Consortium (EAPC) is available free of charge to all University students. EAPC is a confidential, short-term counseling and referral service that is equipped to provide various support services, including short-term therapy and crisis intervention. EAPC counselors are available Monday through Friday, 9 a.m. to 5 p.m. The EAPC is located at 409 East 60th Street, Room 3-305, New York,

NY 10022; tel: 212-746-5890. See <http://youreapc.us/Services.shtml> for more information.

Additional information about sexually transmitted infections, sexual assault forensic examinations, and resources available to victims of sexual violence may be found on the New York State Department of Health website at:

https://www.health.ny.gov/prevention/sexual_violence/; and by contacting The New York State Office of Victim Services: tel: 800-247-8035 or www.ovs.ny.gov.

University Protections and Accommodations for Its Students

The University may offer any of the following protections and accommodations, as appropriate, to a University student who has been a victim or accused of sexual violence, relationship violence, and/or stalking:

- **No Contact Order**: When the accused is a student, the University may issue and provide a copy of a “no contact order” to the victim and the accused whereby continued intentional contact with the victim would be a violation of University policy and thus, subject to additional disciplinary action. If the accused and victim observe each other in a public place, the accused will be responsible for leaving the area immediately and without directly contacting the victim.
- **Assistance Obtaining an Order of Protection**: A student may request that the University’s Director of Security or other appropriate University representative assist the student in obtaining a court order of protection and/or explain to the student the order and the consequences of violating the order. The University will provide to the student, a copy of the court order of protection when received by the University. University Security shall assist local law enforcement, if necessary, in effecting an arrest for violation of an order of protection.
- **Interim Sanctions**: When the accused is determined to present a continuing threat to the health and safety of the University community, the University may institute an interim suspension, as appropriate, pending the outcome of the University’s investigation or appeal process (or local law enforcement’s investigation) and in accordance with other rules and policies of the University, including the University’s Grievance Procedures and the Non-Discrimination, Anti-Harassment, and Anti-Retaliation Policy.
- **Interim Accommodations**: The University may provide reasonable interim measures and accommodations to the victim and/or the accused that effect a change in academic, housing, employment, transportation, or other applicable arrangements in order to help ensure safety, prevent retaliation, and avoid an ongoing hostile environment.

A University student who is a victim or an accused may (i) request any of the above protections or accommodations, (ii) request to be afforded a reasonably prompt review by the Title IX Coordinator or his/her designee of the need for and terms of any of the above

protections or accommodations (even if the victim does not file or continue to pursue a complaint), including potential modification, and (iii) will be allowed to submit evidence in support or defense of the request. The Title IX Coordinator will be responsible for coordinating with appropriate offices on campus to implement appropriate measures.

Procedural Rights

In addition to the procedural rights set forth in the Policy, a student who has been the victim of, or has been accused of, a violation of the Policy has a right to:

- Have access to a full and fair record of any hearing, and have the record be preserved for at least five years from the date of such a hearing;
- Have access to a fair and impartial appeal panel's review of the determination;
- Have the University's investigation or appeal process occur concurrently with a criminal justice investigation and proceeding if a criminal complaint was filed, except for temporary delays requested by local law enforcement to gather evidence;
- Exclude her/his own prior sexual history with persons other than the accused or her/his own mental health diagnosis and/or treatment from the University's investigation or appeal process. However, past findings of sexual assault, relationship violence, and/or stalking may be admissible in determining sanctions; and
- Choose whether to disclose or discuss the outcome of the University's investigation or appeal process, except that all information obtained during the course of the investigation or appeal process must be protected from public release until a final appellate determination has been made, unless otherwise required by law.

Sanctions

Sanctions against an individual found to have violated the University's Policy may include, for example: training; referral to counseling; monitoring of the offender; warning or reprimand; suspension or expulsion (in the case of a student offender); or withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, suspension, or termination (in the case of an employee offender).

For crimes of sexual violence, the University will make a notation on the transcript of students found responsible for a violation pursuant to the University's investigation and appeal process that the student was "suspended after a finding of responsibility for a code of conduct violation" or "expelled after a finding of responsibility for a code of conduct violation", as appropriate. For an accused who withdraws from the University while such conduct charges are pending, and declines to complete the investigation process, the University will make a notation on the transcript of such students that they "withdrew

with conduct charges pending.” Such notation will not be removed prior to one year after conclusion of the suspension, while notations for expulsion will not be removed. If a finding of a violation of University Policy is vacated for any reason, any such transcript notation will be removed.

Policy adopted by EOG on September 29, 2015, updated February 2016, as amended on December 18, 2017 and February 26, 2018.