



Policy Title: **Title IX Policy**

Policy Number: PS 4

Purpose of Policy: To prohibit discrimination on the basis of sex; establish procedures for reporting, investigation, and resolution; and ensure compliance with Title IX of the Education Amendments of 1972, the Violence Against Women Reauthorization Act, and implementing regulations, all as amended.

Applies to: All Students, Staff, Faculty, and Third-parties

Policy Statement:

Consistent with the University's Non-Discrimination Notice and the U.S. Department of Education's regulations under Title IX of the Education Amendments of 1972 ("Title IX") (see 34 C.F.R. § 106 et seq.), the University prohibits Sexual Harassment that occurs within its education programs and activities. For purposes of this policy, Sexual Harassment includes Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking.

I. Scope and Jurisdiction

A. Scope.

1. This policy applies to Sexual Harassment that occurs within the University's Education Programs and Activities and that is committed by an administrator, faculty member, staff, student, contractor, guest, or other member of the University community.
2. This policy does not apply to Sexual Harassment that occurs off-campus, in a private setting, and outside the scope of the University's Education Programs and Activities; such sexual misconduct may be prohibited by the Student Code of Conduct if committed by a student, the Faculty Handbook if committed by a faculty member, or other University policies and standards if committed by an employee
3. Consistent with the U.S. Department of Education's implementing regulations for Title IX, this policy does not apply to Sexual Harassment that occurs outside the geographic boundaries of the United States, even if the Sexual Harassment occurs in the University's Education Programs and Activities, such as a study abroad program. Sexual Harassment that occurs outside the geographic boundaries of the United States is governed by the Student Code of Conduct if committed by a student, the Faculty Handbook if committed by a faculty member, or other University policies and standards if committed by an employee, including but not limited to the Employee-Student Relationships policy (University Policy Statement 5).

4. This policy applies only to Sexual Harassment. Complaints of other forms of sex discrimination are governed by the University's Non-Discrimination Policy (University Policy Statement 6).
- B. **Jurisdiction.** The University has jurisdiction over complaints alleging discrimination and harassment only when the conduct occurs in an education program or activity and within the geographic boundaries of the United States. This is limited to the following:
1. The alleged conduct or incident occurred on campus or any other property owned or controlled by the University;
 2. The alleged conduct or incident occurred during or at an official University program or activity (regardless of location);
 3. The alleged conduct or incident occurred off-campus in any context other than I.B.2, above, *if* the University exercised substantial control over both the **Respondent** and the context in which the alleged conduct or incident occurred.
 4. The alleged conduct or incident occurred at an off-campus property owned or controlled by an officially-recognized student organization.
- C. **Referrals for Reports Outside this Scope or Jurisdiction.** Any reports outside the scope or jurisdiction of this policy may be referred to another department having jurisdiction under another University policy/procedure (*e.g.*, the University's Non-Discrimination Policy, the Student Code of Conduct or the Employee Handbook violations).

II. Implementation

- A. **Prohibited Conduct.**
1. Bellevue University prohibits sexual harassment as defined below in Section VIII. For purposes of this policy, Sexual Harassment includes Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking.
 2. Bellevue University prohibits retaliation as defined below in Section VIII and further described in Section VII.
- B. **Title IX Coordinator Role.** The University has designated a Title IX Coordinator to oversee the University's response to reports under Title IX and to identify and address patterns or systemic problems revealed by such reports or complaints, including complaints of sex discrimination and all other complaints under this policy. The Title IX Coordinator is charged with coordinating the University's compliance with federal Title IX regulations. The Title IX Coordinator role is expected to be neutral, free from bias or conflict of interest, and does not act as an advocate for either the Complainant or the Respondent.
- C. **Training.** The University will ensure that individuals involved in carrying out this policy or the corresponding formal grievance process (including the Title IX Coordinator, Investigators, Advisors, Hearing Officers, Informal Resolution Facilitators, Decision Makers, and Appeals Officers) are appropriately trained.
- D. **Reporting.**
1. Reporting Options. The University encourages the reporting of prohibited conduct under this policy.

- a. **Reporting to the University.** Anyone wishing to make a report of alleged or possible prohibited conduct under this policy may do so by submitting a report through the University's online report form at:
https://bellevue-advocate.symplicity.com/public_report/index.php/pid494675?

Or contact Title IX Coordinator at:

Title IX Coordinator
Bellevue University
1000 Galvin Road South
Bellevue, Nebraska 68005
402-557-5299
TitleIX@bellevue.edu

- i. **Who May Submit a Report.** Reports may be submitted by anyone subjected to Prohibited Conduct (Complainants), employees, or any other person with knowledge of Prohibited Conduct under this policy.
- ii. **Anonymous Reporting.** The University accepts anonymous reports of conduct alleged to violate this policy and will follow up on such reports. The reporter is encouraged to provide as much detailed information as possible to allow the University to investigate and respond as appropriate. The University may be limited in the ability to investigate an anonymous report unless sufficient information is furnished to enable the University staff to conduct a meaningful and fair investigation. University employees who are subject to the mandatory reporting requirement below may not make reports anonymously.

2. Reporting to Law Enforcement

- a. If someone is in immediate danger or needs immediate medical attention, call emergency services at 911. You may also report to the Campus Safety Department (402-557-5000), and/or to the Bellevue Police Department (402-293-3100).
- b. The University recommends that criminal reports be made to law enforcement, even if it is uncertain whether the particular conduct is a crime. Calling local law enforcement can help you obtain emergency and nonemergency medical care, get immediate law enforcement response for your protection, understand how to provide assistance in a situation that may escalate to more severe criminal behavior, arrange a meeting with victim advocate services, find counseling and support, initiate a criminal investigation, and answer questions about the criminal process. However, a Complainant may decline to notify such authorities. Except in emergency situations, University employees shall not contact law enforcement without the consent of a Complainant.
- c. **Right to File an External Report.** Any person may also file a complaint of sex discrimination with the United States Department of Education's Office for Civil Rights regarding an alleged violation of Title IX by visiting www2.ed.gov/about/offices/list/ocr/complaintintro.html or by calling 1-800-421-3481.

3. Reporting Obligations.

- a. **Employee Reporting; Mandatory Reporting Officials.** In addition to reporting to the Title IX Coordinator, any person may report Sexual Harassment to any University employee with managerial authority over other employees, including executives, deans, directors, supervisors, and other managers (collectively "Reporting Officials") who must promptly forward such report of Sexual Harassment to the Title IX Coordinator. University employees who are not Reporting Officials are encouraged, but are not required to, forward reports of Sexual Harassment to the Title IX Coordinator
 - b. **Incidents Involving Minors.** Individuals are obligated by state law to report any suspected abuse and/or neglect of a child to the Nebraska Department of Health and Human Services (Nebraska hotline: 1-800-652-1999) or, if the conduct occurred in another state, the applicable state agency.
- E. **Amnesty for Drug or Alcohol Possession/Consumption Violations.** The University strongly encourages students to report instances of Prohibited Conduct involving students. Therefore, students who report information about Prohibited Conduct will not be disciplined by the University for a violation of the University's drug or alcohol possession or consumption policies in which they might have engaged in connection with the reported incident. However, the University cannot guarantee that, if the misconduct is reported to local law enforcement, the police will not take action against an individual for unlawful drug or alcohol possession/consumption.

III. Supportive Measures. The University may provide supportive measures as defined below in Section VIII and as further described in the grievance process to a Respondent and/or Complainant, as appropriate and reasonably available. Supportive measures are determined on a case-by-case basis by the Title IX Coordinator and are provided without fee or charge to the Complainant or Respondent.

IV. Emergency Removals. The University reserves the right to remove a Respondent from the University or portions of its education program or activity on an emergency basis following an individualized safety and risk analysis and determination that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal. Emergency removals and appeals thereof will be carried out as described in the grievance process.

V. University Response to Report, Formal Complaint, and Grievance Process.

A. Action Following Report.

1. Upon receipt of a report of prohibited conduct under this policy, the Title IX Coordinator shall promptly contact the Complainant to provide information and offer appropriate supportive measures as further described in the grievance process.
2. The University may not impose punitive or disciplinary measures against any individual, including an alleged Respondent, unless a formal complaint has been filed, a formal grievance process has been carried out, and a formal finding of a policy violation has been made.

B. **Initiating a Formal Complaint and Investigation.** A formal complaint as defined below and further described in the grievance process is required in order to initiate formal investigation and grievance process.

C. **Informal Resolution.** Information regarding available informal resolution options in response to a formal complaint are described in the grievance process.

- D. **Formal Grievance Process.** Upon receipt of a formal complaint, the Title IX Coordinator shall initiate the formal grievance process. The purpose of the grievance process is to provide for the prompt and equitable resolution of formal complaints alleging prohibited conduct under this policy. Following the grievance process, any Respondent determined to be responsible for a violation of this PS 4 may be subject to disciplinary actions.

VI. Violations; Sanctions and Remedies.

- A. **Violations.** A Respondent determined to be responsible for a violation of this PS 4 as a result of the grievance process will be subject to disciplinary action under this policy as directed in a written Notice of Determination. A Decision Maker may also direct the University to provide remedies designed to restore or preserve equal access to the education program or activity to the Complainant.
- B. **Sanctions.** Sanctions for violations of this policy resolved through the formal grievance process will be imposed only as directed by a Decision Maker or Appeal Officer following a hearing in accordance with the grievance process. The University may not impose punitive or disciplinary measures under this policy against any individual, including an alleged Respondent, unless a formal complaint has been filed, a formal grievance process has been carried out, and a formal determination of responsibility for a violation been made. Consequences for violating this policy will depend upon the facts and circumstances of each particular situation. The severity of sanctions or corrective action will depend on the frequency and severity of the offense and any history of past prohibited conduct. Sanctions may include but are not limited to:
1. A requirement not to repeat or continue the prohibited conduct;
 2. Reprimand or warning;
 3. A no-contact directive;
 4. Reassignment or a requirement to change the academic, on-campus work, or on-campus living situation;
 5. Probation;
 6. Suspension (of student and/or employee roles);
 7. Removal from student housing;
 8. Expulsion from the University;
 9. Termination of employment with the University;
 10. With respect to students, any of the sanctions identified in the Bellevue University Student Code of Conduct (PS 1901);
 11. With respect to employees, any of the disciplinary actions identified in the Bellevue University Employee Handbook;
 12. Any other reasonable punitive or disciplinary measure.
- C. **Remedies.** A Decision Maker or Appeal Officer may also direct the University to provide reasonable remedies designed to restore or preserve a Complainant's equal access to the education program or activity following a determination of responsibility. Such remedies may include the same or similar supportive measures as outlined in PS 4, except that unlike pre-grievance supportive measures, such remedies may be disciplinary or punitive in nature as to the Respondent or otherwise burden the Respondent (such as requiring a Respondent to be removed

from or reassigned units within student housing; or requiring a Respondent to change class sections).

VII. Confidentiality.

- A. **Privacy Rights.** Reports and proceedings involving students under this policy are generally subject to the Family Education Rights and Privacy Act (FERPA) (20 U.S.C. 1232g; 34 CFR Part 99) (*See also*: BU Policy Statement 12, FERPA). The University will not disclose information about reports, actions, parties, witnesses or proceedings under this policy except as allowed by FERPA, as required by law, or as necessary to carry out proceedings under this policy.
- B. **Confidentiality vs. Anonymity.** The University treats all reports and proceedings under this policy as confidential, meaning that it will not disclose information about the case to any third-party, subject to the exceptions in the preceding section. However, Complainants who choose to file a formal complaint may not remain anonymous – meaning their identity will be known to the Respondent and others involved in proceedings under this policy in accordance with the formal grievance process.
- C. **Parties' Rights.** While the University will maintain confidentiality as provided in this section, the University will not limit the ability of the parties to discuss the allegations at issue in a particular case. Parties are advised, however, that the manner in which they communicate about, or discuss a particular case, may constitute Sexual Harassment or Retaliation in certain circumstances and be subject to discipline pursuant to the processes specified in this policy.

VIII. Retaliation.

- A. **Retaliation Prohibited.** The University prohibits any act by any person to intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or grievance process under this policy. Action is generally deemed retaliatory if it would deter a reasonable person in the same circumstances from opposing practices prohibited by this policy or participating in proceedings under this policy.
- B. **Examples** of retaliation include but are not limited to:
 - 1. Directly or indirectly intimidating, threatening, coercing, harassing a party or witness, or attempting to influence an individual's participation in an investigation, proceeding, or grievance process.
 - 2. Charging an individual with code of conduct violations that do not involve sexual harassment, but arise out of the same facts or circumstances as a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX.
- C. **Retaliation Exclusions.** Retaliation does not include:
 - 1. Charging an individual with code of conduct violations that do not involve sexual harassment, but arise out of the same facts or circumstances as a report or formal complaint of sexual harassment, for a purpose other than interfering with any right or privilege secured by Title IX. (e.g., Student Code of Conduct or Employee Handbook violations pursuant to a zero tolerance policy or Student Housing Handbook violations for the purpose of maintaining health and safety).

2. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a Title IX report or grievance proceeding. A determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith, and such a conduct violation must be supported by a preponderance of the evidence.

- D. **Retaliation Reports.** Any individual who may file a report of retaliation under this policy with the Title IX Coordinator using one the contact methods outlined above in Section II.D.1. The procedures in the grievance process will apply to any reports of retaliation.

IX. Definitions. The following definitions apply to this policy and procedure:

- A. **Advisor** means a person of a party's choosing or designated by the University, if the party does choose or supply their own, who may accompany the party to any meeting or proceeding under this policy, receive certain information about the case from the University, and ask relevant questions of the other party and any witnesses during a live hearing, subject to the limitations in the grievance process.
- B. **Appeal Officer** means the person designated by the University to review cases on appeal and make decisions in appeals under this policy. The Appeal Officer may not be the same person serving as the Decision Maker, the Title IX Coordinator, or the Investigator in any particular case.
- C. **Complainant** means the party to the process who has allegedly experienced the Prohibited Conduct at issue. For consistency, this term is used for the alleged victim of the Prohibited Conduct in all cases. Use of this term does not necessarily indicate that this person initiated the report or requested that the University take action.
- D. **Consent**
 1. "Consent" refers to words or actions that a reasonable person in the perspective of the Respondent would understand as agreement to engage in the sexual conduct at issue. A person who is incapacitated, as defined below, is not capable of giving consent.
 2. "Coercion" is direct or implied threat of force, violence, danger, hardship, or retribution sufficient to persuade a reasonable person of ordinary susceptibility to perform an act which otherwise would not have been performed or acquiesce in an act to which one would otherwise not have submitted. Coercion can include unreasonable and sustained pressure for sexual activity.
 3. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. A person's words or conduct cannot amount to Coercion for purposes of this policy unless they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity.
 4. "Incapacitated" refers to the state where a person does not appreciate the nature or fact of sexual activity due to the effect of drugs or alcohol consumption, medical condition or disability, or due to a state of unconsciousness or sleep
- E. **Dating Violence** means violence committed by a person:
 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:

- a. The length of the relationship;
- b. The type of relationship;
- c. The frequency of interaction between the persons involved in the relationship.

20 U.S.C. 12291(a)(10).

Nebraska law does not specifically define dating violence but such conduct is covered by the crime of domestic assault found at Neb. Rev. Stat. § 28-323 and the act of domestic abuse found at Neb. Rev. Stat. § 42-903.

- F. **Decision Maker** means the person designated by the University to determine responsibility for violations of this policy and issue a written determination. If a Respondent is determined to be responsible for a violation of this policy, the Decision Maker also determines disciplinary sanctions to be imposed on the Respondent, and whether remedies designed to restore or preserve equal access to the affected education program or activity will be provided to the Complainant by the University. The Decision Maker may not be the same person serving as the Title IX Coordinator or as the Investigator in any particular case.
- G. **Domestic Violence means** felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
20 U.S.C. 12291(a)(8).
Nebraska law does not specifically define domestic violence but such conduct is covered by the crime of domestic assault found at Neb. Rev. Stat. § 28-323 and the act of domestic abuse found at Neb. Rev. Stat. § 42-903.
- H. **Education program or activity** includes locations, events, or circumstances over which the University exercised substantial control over both the Respondent and the context in which the alleged Prohibited Conduct occurs, and also includes any building owned or controlled by a student organization that is officially recognized by the University.
- I. **Formal complaint** means a document filed by a Complainant or signed by the Title IX Coordinator alleging sexual harassment against a Respondent and requesting that the University investigate the allegation of Prohibited Conduct. A formal complaint may only be filed by a Complainant or the Title IX Coordinator.
- J. **Grievance process** means the procedures adopted by Bellevue University in the document entitled "Title IX Grievance Process," to support this policy and comply with Title IX in addressing formal complaints of Prohibited Conduct under this policy.
- K. **Hearing Officer** means the person designated by the University to conduct or oversee a hearing carried out as part of a grievance process under this policy. The Hearing Officer may or may not be the same person as the Decision Maker.
- L. **Informal Resolution** means the informal resolution process as described in detail in the grievance process.

- M. **Informal Resolution Facilitator** means the person designated by the University to facilitate informal resolution.
- N. **Investigator** means the person designated by the Title IX Coordinator to investigate allegations of Prohibited Conduct, gather evidence relevant to the formal complaint, present evidence and written investigative findings to the Decision Maker.
- O. **Party or Parties** refers to the Complainant, Respondent, or both collectively, of a particular report under this policy.
- P. **Prohibited Conduct** means the conduct listed in Section II.A above as further defined in this section, which constitutes a violation of this policy.
- Q. **Report** means a report of alleged or possible Prohibited Conduct filed under Section II.D.1 of this policy.
- R. **Respondent** means an individual who has been reported to be the perpetrator of Prohibited Conduct under this policy.
- S. **Retaliation** means any act by any person to intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or grievance process under this policy.
- T. **Sexual Harassment**¹ includes the following:
1. "Sexual Harassment" is conduct on the basis of sex that constitutes Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, or Stalking.
 2. "Quid Pro Quo Sexual Harassment" occurs when an employee of the University conditions the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual contact.
 3. "Hostile Environment Sexual Harassment" is unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person access to the University's Education Programs and Activities.
 4. "Sexual Assault" includes the sex offenses of Rape, Sodomy, Sexual Assault with an Object, Fondling, Incest, and Statutory Rape.²

¹ Examples of Sexual Harassment may include but are not limited to: unwelcome touching, kissing, hugging, rubbing, or massaging; repeatedly subjecting another to egregious, unwelcome sexual attention; attempting to coerce an unwilling person into sexual activity; unnecessary and egregious references to male/female body parts, sexually explicit profanity, sexual innuendos, jokes, or humor; displaying pornography or sexual graffiti, pictures, videos or posters; unwelcome asking or telling about sexual fantasies, sexual preferences, or sexual activities; sending sexually explicit emails, text messages, or social media communications; requesting sexual favors in return for employment, athletic, or other rewards, or threats if sexual favors are not provided; non-consensual visual or audio-recording of sexual activity or distribution of recordings, photos or other information of another individual's sexual activity or intimate body parts; exposing one's genitals in non-consensual circumstances, or inducing another to expose his or her genitals.

² The University's definition of "Sexual Assault" is mandated by federal regulations implementing Title IX of the Education Amendments of 1972. Those regulations require the University to adopt a definition of "Sexual Assault" that incorporates various forcible and non-forcible sex crimes as defined by the FBI's Uniform Crime Reporting System. See 34 C.F.R. § 106.30(a).

- a. "Rape" is the carnal knowledge of a person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity. There is "carnal knowledge" if there is the slightest penetration of the vagina or penis by the sexual organ of the other person. Attempted Rape is included.
 - b. "Sodomy" is oral or anal sexual intercourse with another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
 - c. "Sexual Assault with an Object" is using an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity. An "object" or "instrument" is anything used by the offender other than the offender's genitalia.
 - d. "Fondling" is the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
 - e. "Incest" is sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by the law of the applicable jurisdiction.
 - f. "Statutory Rape" is sexual intercourse with a person who is under the statutory age of consent as defined by the law of the applicable jurisdiction.
- 5. Sexual harassment includes Dating Violence as defined in this section;
 - 6. Sexual harassment includes Domestic Violence as defined in this section;
 - 7. Sexual harassment includes Stalking as defined in this section.
- U. **Stalking** means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.
- 20 U.S.C. 12291(a)(30).*
- The definition of stalking under Nebraska law can be found at Neb. Rev. Stat. §§ 28-311.02 and 28-311.03.*
- V. **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. Such measures are designed to restore or preserve equal access to the recipient's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the recipient's educational environment, or deter sexual harassment.
- W. **Title IX** means Title IX of the Education Amendments of 1972 (20 U.S.C. 1681-1688) and its implementing regulations (34 C.F.R. Part 106), as amended.
- X. **Title IX Coordinator** means the person designated to coordinate the University's compliance with Title IX as further outlined in Section II.B. above.

- Y. **VAWA** means Violence Against Women Reauthorization Act, as amended (42 U.S.C. 13925 and 14043e *et seq.*).
 - Z. **Witness** means an individual who provides a statement, evidence, or other information in a matter under this policy.
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Supporting Documentation: Title IX, Clery Act, Campus SaVE Act, Violence Against Reauthorization Women Act (VAWA), Title IX Grievance Process, Bellevue University Student Code of Conduct, Bellevue University Employee Handbook, Bellevue University Faculty Handbook, Bellevue University Student Housing Handbook.

Keywords: Title IX, VAWA, sexual harassment, sexual assault, domestic violence, dating violence, stalking, retaliation, consent, hostile environment, report, complaint, supportive measures, grievance process, investigation, hearing, appeal

Responsible Office: Title IX Office

Contact Information: Title IX Coordinator
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TitleIX@bellevue.edu

Approved by: Dr. Mary Hawkins, President

Effective Date: February 1, 2025³

Review Cycle and Dates: This policy statement supersedes previous versions of PS 4, dated August 1, 2024, August 14, 2020, December 1, 2014, May 14, 2014, November 15, 2004, and September 1, 2001. This policy also replaces PS 5 dated February 17, 1995

APPROVED:

This policy statement was signed by Dr. Mary Hawkins, Bellevue University President, on February 3, 2025.

³ In light of the court ruling in *State of Tennessee v. Cardona*, No. 2: 24-072-DCR (E.D. Ky. Jan. 9, 2025), this policy and the corresponding grievance process retroactively supersedes the prior version of PS 4 dated August 1, 2024 and its corresponding grievance process. For the avoidance of all doubt, the 2025 version will apply retroactively to any complaints that arose while the 2024 version of the policy/process was in effect.