



UNIVERSITY OF RICHMOND

Policy Manual

Policy #:	GOV-3105	Policy Title:	Title IX Coordinators Policy
Effective:	08/14/2020	Responsible Office:	Office of the General Counsel
Date Approved:	08/14/2020	Approval:	University President
Replaces Policy Dated:	01/23/2018	Responsible University Official:	Director of Compliance and Title IX Coordinator

PURPOSE:

The University prohibits discrimination and harassment against applicants, students, faculty or staff on the basis of race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity, gender expression, disability, status as a veteran or any classification protected by local, state or federal law.

The University is committed to ensuring compliance with Title IX of the Education Amendments of 1972 (hereinafter “Title IX”), which prohibits discrimination on the basis of sex in any education program or activity receiving federal financial assistance. The purpose of this policy is to identify the individuals responsible for overseeing and coordinating the University’s compliance with Title IX (the “Title IX Coordinators”) and to set forth the roles and responsibilities of the Title IX Coordinators.

SCOPE:

This policy applies to the University of Richmond (the “University”) and all of its school and departments.

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GOV-3105 – Title IX Coordinators Policy

POLICY STATEMENT:

GOV-3105.1 – Policy

The University shall appoint one individual to serve as the Title IX Coordinator and three individuals to serve as Deputy Title IX Coordinators. Such appointments shall be made by the President of the University and individuals appointed as Title IX Coordinators shall continue to serve in such roles until they resign or are replaced by the President. The Title IX Coordinators shall have the responsibilities set forth in this policy.

GOV-3105.2 – Director of Compliance and Title IX Coordinator

The Director of Compliance and Title IX Coordinator shall have primary responsibility for coordinating the University's efforts to comply with and carry out its responsibilities under Title IX.

1. *Designation.* The University's Director of Compliance and Title IX Coordinator shall serve as the University's Title IX Coordinator.
2. *Responsibilities.* The Title IX Coordinator's responsibilities shall include the following:
 - a. Overseeing the development and implementation of all University policies designed to foster and enhance compliance with Title IX;
 - b. Overseeing the formal complaint and grievance processes relating to reports or allegations of discrimination, harassment and sexual misconduct, including sexual harassment under Title IX for the campus community;
 - c. Ensuring the prompt and thorough investigation of any formal complaint involving sexual misconduct including sexual harassment under Title IX or allegation of discrimination or harassment on the basis of sex, or other complaints relating to Title IX (hereinafter "Title IX complaints");
 - d. Establishing processes to identify and address patterns or systemic problems that may arise during the investigation of a Title IX complaint;
 - e. Coordinating the compliance activities of all Deputy Title IX Coordinators;
 - f. Ensuring that the University has in place all policies and procedures reasonably necessary to foster compliance with Title IX, including, but not limited to, grievance procedures providing for the prompt and equitable resolution of student and employee Title IX complaints;
 - g. Ensuring that the University notifies its students, faculty, and staff of the name and contact information of all Title IX Coordinators;
 - h. Ensuring that the University notifies its students, faculty, and staff that it does not discriminate on the basis of sex and how to contact the Title IX Coordinators to file Title IX complaints or to ask questions regarding Title IX;
 - i. Ensuring that appropriate school officials, including members of the University's police department, receive training regarding Title IX, including reporting and responding to possible incidents of harassment, discrimination, or sexual misconduct, including sexual harassment under Title IX;

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- j. Meeting with students, faculty, or staff members who wish to file a Title IX complaint or raise a question relating to Title IX;
- k. Working collaboratively with other University officials to assess the campus climate regarding Title IX issues through surveys and other instruments and to analyze collected data; and
- l. Providing periodic updates to the President of the University, the Board of Trustees Audit and Compliance Committee, and the University’s Compliance Oversight Committee regarding the University’s compliance with Title IX and the initiatives underway to prevent, detect or remedy possible violations of Title IX.

In fulfilling their obligations, the Director of Compliance and Title IX Coordinator may delegate certain responsibilities or tasks to the Deputy Title IX Coordinators, other University employees, and/or qualified third parties engaged by the University, as warranted.

GOV-3105.3 – Deputy Title IX Coordinators

1. Designation.

- a. The Sr. Associate Vice President for Human Resources is designated as a Deputy Title IX Coordinator for Employees and is assigned responsibility for Title IX reports involving faculty and staff.
- b. The Deputy Title IX Coordinator for Students is assigned responsibility for Title IX reports involving University students.
- c. The Associate Athletic Director/Senior Women Administrator is designated as the Deputy Title IX Coordinator for Athletics and is responsible for ensuring that the University complies with its Title IX obligations relating to athletic equity. The Associate Athletic Director/Senior Women Administrator is not responsible for sexual misconduct reports.

The Director of Compliance and Title IX Coordinator may designate one or more interim Deputy Title IX Coordinators in the absence of the individuals listed above. Additionally, the Director of Compliance and Title IX Coordinator may designate one or more Title IX investigators to investigate Title IX complaints.

2. Responsibilities. The Deputy Title IX Coordinators shall assist the Director of Compliance and Title IX Coordinator with fulfilling the responsibilities outlined in this policy. In addition, the Deputy Title IX Coordinators shall have the responsibilities set forth below.

- a. Deputy Title IX Coordinator for Employees shall have responsibility for:
 - i. Ensuring the prompt and thorough investigation of any Title IX complaint or formal complaint for cases involving sexual misconduct, including sexual harassment under Title IX involving a faculty or staff member at the University;
 - ii. Establishing processes to identify and address patterns or systemic problems that may arise during the investigation of a Title IX report or formal complaint for cases involving sexual misconduct, including sexual harassment under Title IX from a faculty or staff member;
 - iii. Ensuring that the University has in place policies and procedures reasonably necessary to foster compliance with Title IX, including, but not limited to grievance

procedures

for Title IX reports and formal complaints for cases involving sexual misconduct and sexual harassment under Title IX from faculty and staff members;

- iv. Ensuring that appropriate school officials receive training regarding Title IX, including reporting and responding to possible incidents of discrimination or sexual harassment;
- v. Implementing educational programs and communication plans designed to inform faculty and staff of their rights under Title IX and how to file a Title IX report or complaint;
- vi. Meeting with or assigning a designee to meet with faculty and staff members who wish to file a Title IX report or complaint or raise a question relating to Title IX; and
- vii. Ensuring that appropriate support services, supportive measures, and other resources are made available to complainants, respondents, and witnesses in Title IX complaints.

b. The Deputy Title IX Coordinators for Students shall have responsibility for:

- i. Ensuring the prompt and thorough investigation of any Title IX report or formal complaint for those cases involving sexual misconduct, including sexual harassment under Title IX from a student at the University;
- ii. Establishing processes to identify and address patterns or systemic problems that may arise during the investigation of a Title IX report or formal complaint for cases involving sexual misconduct, including sexual harassment under Title IX from a student;
- iii. Ensuring that the University has in place policies and procedures reasonably necessary to foster compliance with Title IX, including, but not limited to grievance procedures for Title IX complaints from students;
- iv. Ensuring that appropriate school officials, including members of the Student Development Division, receive training regarding Title IX, including reporting and responding to possible incidents of discrimination or sexual harassment;
- v. Coordinating with the Health Relationships & Violence Prevention Educator and other appropriate University employees to implement educational programs and communication plans designed to inform students of their rights under Title IX and how to file a Title IX complaint;
- vi. Meeting with students who wish to file a Title IX report or formal complaint or raise a question relating to Title IX; and
- vii. Ensuring that appropriate supportive measure, and other resources are made available to complainants, respondents, and witnesses in Title IX reports.

c. The Deputy Title IX Coordinator for Athletics shall have primary responsibility for:

- i. Implementing policies and procedures designed to foster the University's compliance with Title IX regulations relating to athletics, specifically 34 C.F.R. § 106.41;

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- ii. Monitoring participation opportunities, operating budgets, coaching staff, and athletic benefits within the University’s varsity athletic program to ensure continued compliance with Title IX;
- iii. In collaboration with other University officials, ensuring that the University complies with all training and education regarding Title IX and sexual misconduct mandated by the NCAA;
- iv. Investigating Title IX complaints relating to athletics, other than those involving allegations of sexual misconduct; and
- v. Meeting with students, faculty, and staff who have a Title IX complaint or question relating to athletics, other than those involving allegations of sexual misconduct.

GOV-3105.4 – Training for Coordinators

The Title IX Coordinators shall attend appropriate training sessions relating to Title IX compliance and their respective duties under this policy, including but not limited to training regarding:

- Overall compliance with Title IX;
- What constitutes sexual misconduct, including sexual harassment under Title IX and sexual violence; and
- How to administer the University’s non-discrimination and sexual misconduct policies, student conduct policies and procedures and faculty and staff conduct policies and procedures

A complete list of all trainings the Title IX Coordinator has participated in can be found at prevent.richmond.edu.

RELATED POLICIES:

GOV-1004 Policy Prohibiting Retaliation

GOV-3102 Policy Prohibiting Sexual Misconduct

Policy Professional Expectations Policy

Progressive Discipline Policy

Department of Athletics, Sexual Misconduct Prevention and Education Policy

Policy on Prohibiting Harassment Discrimination and Sexual Misconduct for Faculty and Staff

POLICY BACKGROUND:

Original policy was created August 16, 2011 and updated on August 6, 2020.

POLICY CONTACTS:

Director of Compliance and Title IX Coordinator