

## **HARASSMENT AND NONDISCRIMINATION POLICY <sup>1</sup>**

Western Technical College (Western) is committed to building and preserving an educational and workplace environment where students and employees can learn and work together free from discrimination, harassment and retaliation in all benefits, programs, and activities. To ensure Western's commitment to fostering an environment built on a foundation of integrity, teamwork, and respect, the college has developed internal policies and procedures that provide a prompt, fair, and impartial process for complaints of discrimination and harassment on the basis of Protected Characteristics, and for complaints regarding retaliation. Western is committed to ensuring compliance with federal and state civil rights and First Amendment laws and regulations.

### **Scope of Policy**

Western Technical College prohibits all form of discrimination. Discrimination, for purposes of this policy, may involve exclusion from or different treatment in programs or activities, such as admissions, athletics or employment. Discrimination may at times take the form of harassment, sex-based discrimination, sexual harassment, sexual assault, stalking, sexual exploitation, dating violence, or domestic violence. When an alleged violation of this policy is reported, the allegations are subject to resolution using Western's Sexual Harassment Grievance Procedure or Western's Discrimination and Sexual Misconduct Grievance Procedure.

This policy applies to all members of the Western community, including, but not limited to, students<sup>2</sup>, employees<sup>3</sup>, others engaged in business with the College, volunteers, guests, and visitors.

This policy applies to any College employment or educational program or activity. The procedures referenced in this policy may be applied to behaviors that take place on any Western campus or controlled property, and at Western sponsored events. This policy may apply to off-campus or online conduct that effectively deprive some of access to Western's educational program, or when the conduct is determined by the Title IX Coordinator to affect a substantial Western interest. A substantial interest is defined by Western as:

- a. Any action that constitutes a criminal offense as defined by law. This includes, but is not limited to, single or repeat violations of any local, state or federal law;
- b. Any situation in which it is determined that the respondent poses an immediate threat to the physical health or safety of any student or other individual;

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<sup>1</sup> ATIXA 2020 ONE POLICY, TWO PROCEDURES MODEL. Use and adaptation of this model with citation to ATIXA is permitted through a limited license to Western Technical College. All other rights reserved. ©2020. ATIXA

<sup>2</sup> For the purpose of this policy, "student" is defined as any person who attends and/or is enrolled in any classes or program at the college.

<sup>3</sup> For the purpose of this policy, "employee" is defined as a person in the service of the College under any contract of hire, express or implied, oral or written, where the College has the power or right to control and direct the employee in the details of how the work is performed.

- c. Any situation that significantly impinges upon the rights, property, or achievements of oneself or others or significantly breaches the peace and/or causes social disorder; and/or
- d. Any situation that is detrimental to the educational or workplace environment of the College

The policy may be applied to behavior conducted in person, through writing, or through technology such as phone, online, email or other electronic medium, where the speech or conduct is not protected by freedom of expression. Discrimination, harassment and retaliation against members of the Western community are not protected expression under the First Amendment.

If a Respondent is unknown or is not a member of Western's community, the Title IX Coordinator will assist the Complaint in identifying appropriate campus and local resources and support options, and/or in contacting local law enforcement if the individual would like to file a police report.

### **Title IX Coordinators**

The Dean of Students and the Manager of Employment, Compensation and Compliance serve as Title IX Coordinators and oversee implementation of Western's Harassment and Nondiscrimination policy, Equal Opportunity plan, and disability compliance. The Title IX Coordinators are responsible for coordinating the intake, investigation, resolution and implementation of measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy.

### **Independence and Conflict-of-Interest**

The Title IX Coordinators act with independence and authority free from bias and conflicts of interest. The Title IX Coordinators oversees all resolutions under this policy and the applicable grievance procedures with impartiality. All members of the Title IX team are trained to ensure they are not biased for or against any party participating in a grievance procedure.

Any concerns involving bias, conflicts of interest, or complaints of misconduct or discrimination by the Title IX Coordinator should be communicated to Western Technical College's President:

Dr. Roger Stanford  
[standfordr@westernnc.edu](mailto:standfordr@westernnc.edu)  
400 7<sup>th</sup> Street North  
La Crosse, WI 54601

Concerns of bias or potential conflict of interest, discrimination or misconduct by any other Title IX team member including investigators and decision makers, should be communicated to the Title IX Coordinator.

### **Policy on Equal Employment and Educational Opportunity**

The College will not discriminate against any employee or applicant for employment, student or prospective student based on race, color, sex, sexual orientation, religion, creed, national origin,

ethnicity, ancestry, age, disability, marital status, veteran status or military service, genetic information, pregnancy, off-campus use/nonuse of lawful products, arrest or conviction record, or any other characteristic protected by federal, state, or local law (hereinafter "Protected Characteristic(s)"). This prohibition applies to recruitment, hiring, transfers, promotions, training, layoff or recall from layoff, terminations, retention, certification, testing and committee appointments, education and assistance thereof, and social or recreation programs. The College is strongly committed to this policy, and believes in and practices equal opportunity and affirmative action.

Principal publications available to students, employees, applicants for admissions or employment, and sources of referral for both, will include a statement of nondiscrimination which specifically includes reference to [Title IX of Education Amendments of 1972](#) and to [Section 504 of the Rehabilitation Act of 1973](#). Delivery of student services will be performed in harmony with statutory requirements.

It is the policy of the College to assure equal opportunity for qualified applicants for employment, for qualified employees in matters of employment, and for students in District educational programs in all educational and employment related activities. This policy applies to all students, employees, applicants, and prospective students irrespective of any Protected Characteristic(s). Responsibility for the Equal Employment Opportunity is assigned to the Manager of Employment, Compensation and Compliance.

The College is committed to compliance with all applicable local, state and federal equal opportunity and affirmative action laws and regulations, including:

1. [Title VI](#) and [Title VII](#) of the 1964 Civil Rights Act
2. [Title IX of the 1972 Educational Amendments Act](#)
3. [Section 504 of the Rehabilitation Act of 1973](#)
4. [The American With Disabilities Act of 1990](#)
5. [The Civil Rights Act of 1991](#)
6. [The Carl D. Perkins Vocational and Technical Education Act](#)
7. [The Equal Pay Act of 1963](#)
8. [The Pregnancy Discrimination Act](#)
9. [The Age Discrimination Act of 1967](#)
10. [The Age Discrimination Act of 1975](#)
11. The Civil Rights Restoration Act of 1987
12. [The Genetic Information Nondiscrimination Act of 2008](#)
13. [The Wisconsin Fair Employment Law](#)
14. Other appropriate laws and executive orders and/or administrative directives and codes including the Office of Civil Rights Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Programs (34 CFR, Part 100 Appendix B)

The College will provide equal educational opportunity in an educational climate that is conducive to and supportive of cultural and ethnic diversity. This commitment includes, but is not limited to, physical access to courses and programs; physical education and athletics, extra-curricular activities; admissions; student policies and their application; counseling, guidance and placement services; financial assistance;

work-study; housing and all other District facilities. The District will make reasonable accommodations for persons with disabilities to assure access to programs and employment.

The District will provide reasonable accommodation to employees and students for religious observances and practices.

### **Policy on Harassment and Nondiscrimination**

Western Technical College is committed to building and preserving a community where people can work and learn together free from exploitation, abusive conduct, intimidation, discrimination, and harassment.

Western Technical College is in full compliance with all federal and state civil rights laws and regulations prohibiting harassment and discrimination. The College will provide protection from harassment and discrimination against students, employees and applicants in any service, program or facility of the College with regard to race, color, creed, religion, sex, national origin, disability, gender identity or expression, ancestry, age, sexual orientation, pregnancy, genetic information, marital status or parental status, veteran or military status, off-campus use/nonuse of lawful products, arrest or conviction record, or any other characteristic protected by federal, state, or local law (herein "Protected Characteristic(s)").

Unlawful or discriminatory harassment is unwelcome physical, written, verbal or other forms of conduct based on a actual or perceived legally protected characteristic (listed above) where submission to or rejection of the unwelcome conduct is made either explicitly or implicitly a condition of a person's education or employment, where submission to or rejection of the unwelcome conduct is the basis for decisions that affect the terms and conditions of academics or employment or where the unwelcome conduct is sufficiently severe or pervasive so as to interfere with a person's learning or work environment or create an environment that a reasonable person would consider intimidating, hostile, or offensive.

Prohibited acts includes, but is not limited to: physical contact or aggression; assault or intimidation; deliberate or repeated unsolicited comments, slurs, epithets, jokes, innuendo or derogatory comments; threatening or intimidating language (in any medium); bullying; or other adverse treatment.

Any member of the Western community whose acts deny, deprive, or limit the educational or employment access, benefits, and/or opportunities of any student, employee, or visitor on the basis of a person's actual or perceived Protected Characteristics is in violation of this policy.

Upon notice of an allegation of harassment or discrimination, any such harassment or discrimination will be promptly and fairly addressed and remedied by Western according to the Discrimination and Sexual Misconduct Grievance Procedure.

Western reserves the right to address harassment that does create a hostile environment or is not based on a Protected Characteristic.

## **Policy on Disability Discrimination and Accommodation**

Western Technical College is in compliance with Section 504 of the 1973 Rehabilitation Act and with the Americans With Disabilities Act of 1990, including changes made by the ADA Amendments Act of 2008. It is the policy of Western Technical College to provide reasonable accommodations (when requested) for qualified individuals with disabilities who are students, potential students, employees or applicants for employment, provided such reasonable accommodations do not place undue hardship on the operations of the College.

The College will adhere to all applicable federal, state, and local laws, regulations, and guidelines with respect to prohibiting discrimination and providing reasonable accommodations as required to afford equal employment and educational opportunity to qualified individuals with disabilities. Reasonable accommodations will be provided in a timely and cost-effective manner upon self-identification, verification and an analysis of solutions.

An individual with a disability is defined by the ADA as a person that has a physical or mental impairment that substantially limits one or more major life activities, a person who has history or record of such an impairment, or a person who is regarded by the college as having an impairment.

The Manager of Access Services has been designated as Western's ADA/504 Coordinator responsible for overseeing efforts to comply with the laws and regulations related to disabilities. The ADA/504 Coordinator in conjunction with the Title IX Coordinators coordinate the response to grievances and addressing allegations of noncompliance or discrimination based on disability.

Grievances related to disability status and/or accommodations will be addressed through the Discrimination and Sexual Misconduct Grievance Procedure.

### **Students with Disabilities**

Western is committed to creating an environment that empowers and supports students to reach their academic goals by providing qualified students with disabilities the appropriate accommodations to reduce barriers to learning. All accommodations are made on an individualized basis. To request disability support services, students are encouraged to contact the Manager of Access Services who coordinates services for students with disabilities.

### **Employees with Disabilities**

Western will provide reasonable accommodation(s) in a timely manner to all qualified employees with known disabilities when the disability impacts the performance of their essential job functions unless such accommodation(s) would result in undue hardship to the College. Employees are encouraged to contact the Manager of Employment, Compensation and Compliance to request an accommodation.

## **Policy on Sexual Harassment**

The Department of Education's Office for Civil Rights (OCR), the Equal Opportunity Commission (EEOC), and the State of Wisconsin regard sexual harassment as a specific form of discriminatory harassment and an unlawful discriminatory practice. Western has adopted the following definition of sexual harassment<sup>4</sup> in order to address the unique environment of an academic community.

Sexual harassment is an umbrella definition that includes the offenses of sexual harassment, sexual assault, domestic violence, dating violence and stalking. Acts of sexual harassment may be committed by any person upon another person, regardless of the sex, sexual orientation, and/or gender identity of those involved. Sexual harassment is conduct based on sex that satisfies one or more of the following:

1. **Quid Pro Quo** – an employee of the College conditioning, either implicitly or explicitly, the provision of aid, benefit or service on an individual's participation in unwelcome sexual conduct;
2. **Unwelcome Conduct** - conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to the College's education program or activity;
3. **Sexual Assault** - engaging or attempting to engage in one of the following sex acts with another individual by force<sup>5</sup> or without consent<sup>6</sup>, where the individual cannot consent because of age, or where the individual cannot consent because of temporary or permanent mental or physical incapacity<sup>7</sup>:
  - **Rape** - the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the Complainant.
  - **Fondling** - the touching of the private body parts of another person (buttocks, groin, breasts) for the purposes of sexual gratification, without the consent of the person, including instances where the Complainant is incapable of giving consent because of their age or because of a temporary or permanent mental or physical incapacity.
  - **Incest** - sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law in Wisconsin.
  - **Statutory Rape** - sexual intercourse with a person who is under the statutory age of consent in Wisconsin.
4. **Dating Violence** - conduct on the basis of sex that consists of violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant. The existence of such a relationship shall be determined based on the

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<sup>4</sup> In accordance with 34 CFR Part 106, §106.3

<sup>5</sup> Force is defined as the use of physical violence and/or physical imposition to gain sexual access, and includes threats, intimidation, and coercion (unreasonable or continued pressure) that is intended to overcome resistance or produce consent.

<sup>6</sup> Consent means words or overt actions by a person who is competent to give informed consent indicating a freely given agreement to have sexual intercourse or sexual contact. Consent can be withdrawn once given, as long as the withdrawal is reasonably and clearly communicated. Consent to some sexual contact cannot be presumed to be consent for other sexual contact or activity. Current or previous intimate relationship is not sufficient for consent.

<sup>7</sup> Incapacitation refers to a person's inability to give consent due being unable to understand what is happening, or is disoriented, helpless, asleep, or unconscious, for any reason, including by alcohol or other drugs. It is determined through consideration of all relevant indicators of an individual's state and is not synonymous with intoxication, impairment, blackout, and or being drunk.

complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

For purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or threat of such abuse, and does not include acts covered under the definition of domestic violence.

5. **Domestic Violence** - a felony or misdemeanor crime of violence committed by:
  - a current or former spouse or intimate partner of the Complainant;
  - a person with whom the Complainant shares a child in common;
  - a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner;
  - a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
  - any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
6. **Stalking**<sup>8</sup> - engaging in a course of conduct directed at a specific person that would cause a reasonable person to (a) fear for the person's safety or the safety of others; or (b) suffer substantial emotional distress.

#### **Other Civil Rights Offenses**

Additional behaviors that may be within or outside of the Title IX forms of sexual harassment listed above that are prohibited when the act is based on the Complainant's actual or perceived membership in a protected class include, but are not limited to:

- **Sexual Exploitation** – taking non-consensual or abusive sexual advantage of another for their own benefit or the benefit of anyone other than the person being exploited, and that conduct does not otherwise constitute sexual harassment as defined in this policy. Examples include, but are not limited to:
  - Observing or allowing others to observe a person undressing, using the bathroom, or engaging in sexual acts without the consent of the person being observed;
  - Prostituting another person or engaging in sex trafficking;
  - Misappropriation of another person's identify on apps, websites, or other venues designed for dating or sexual connections;

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<sup>8</sup> For purposes of this definition, *Course of conduct* means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.

*Reasonable person* means a person under similar circumstances and with similar identities to the victim. *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

- Forcing a person to take an action against that person's will be threatening to show, post, or share information, video, audio or image that depicts the person's nudity or sexual activity
- Taking pictures, videos, or audio recordings of another in a sexual act or sexually related activity without the person's consent when there is a reasonable expectation of privacy, or disseminating sexual pictures without the photographed person's consent.
- **Threatening Behavior** – threatening or causing physical harm; extreme verbal, emotional, or psychological abuse; or other conduct that threatens or endangers the health or safety of any person;
- **Discrimination** – actions that deprive, limit, or deny other members of the community of educational or employment access, benefits, or opportunities;
- **Intimidation** – implied threats or acts that cause an unreasonable fear of harm in another;
- **Bullying** – repeated and/or severe aggressive behavior likely to intimidate or intentionally hurt, control, diminish another person either physically and/or mentally that is not speech or conduct otherwise protected by the First Amendment.

### **Retaliation**

Western will not tolerate any retaliatory conduct against any person in response to a person reporting an incident, participating in or refusing to participate in a grievance process, providing relevant information or cooperating with an investigation, and/or supporting a party involved in the process. Western and any member of the Western community are prohibited from taking or attempting to take adverse action through intimidation, threats, coercion, harassment, or discrimination against an individual for exercising their rights or responsibilities under this policy and procedure.

Allegations of retaliation should be reported immediately to the Title IX Coordinator and will be promptly and fairly investigated. Western will take all appropriate steps to protect individuals who fear they may be subjected to retaliation. The exercise of rights protected under the First Amendment does not constitute retaliation.

### **Reporting Concerns or Alleged Policy Violations**

All employees of Western, except Western Counselors, are required to promptly report any knowledge or allegation pertaining to a member of the community experiencing harassment, discrimination, and/or retaliation to the Title IX Coordinator(s). Employees are responsible for reporting all relevant details about the alleged incident including the name of the Respondent (if known), the individual who experienced the alleged incident, possible witnesses, and relevant facts including the date, time and location.

Complaints or notice of alleged policy violations, or inquiries or concerns regarding this policy and the associated procedures, may be made internally at any time (including non-business hours) through one of the following options:

- Report online through the [Sexual Harassment and Discrimination Report Form](#)



- Report directly to the Title IX Coordinator

Title IX Coordinator – Students  
 Shelley McNeely  
 Dean of Students  
 Student Life Office, Kumm Center Room 100  
 La Crosse Campus  
[mcneelys@westerntc.edu](mailto:mcneelys@westerntc.edu)  
 608-785-9880

Title IX Coordinator – Employees  
 Megan Hoffman  
 Manager of Employment, Compensation and  
 Compliance  
 Administrative Center, Room 109  
 La Crosse Campus  
[hoffmanm@westerntc.edu](mailto:hoffmanm@westerntc.edu)  
 608-785-9274

- File an incident report with the Security Department at 608-785-9191 or Room 131 of the Colman Center, La Crosse Campus.

Reporting an allegation or concern through any of the above-mentioned options constitutes actual knowledge and allows Western to discuss and/or provide supportive measures, but does not obligate the Complainant to file a Formal Complaint<sup>9</sup>. Western’s ability to remedy and respond to the allegation may be limited if the Complainant does not want the College to proceed with an investigation and/or grievance procedure.

While there is no time limiting on reporting concerns or allegations, Western encourages Complainants to report as soon as possible after the incident occurred. Delay in reporting may limit the College’s ability to investigate, respond, and provide remedies.

Information regarding more specific procedures related to sexual harassment can be found in Western’s Sexual Harassment Grievance Procedure. Information regarding more specific procedures related to other forms of harassment or discrimination can be found in Western’s Discrimination and Sexual Misconduct Grievance Procedure.

Inquiries or concerns may be made externally to:

**Office for Civil Rights (OCR) –  
 Department of Education**  
 400 Maryland Avenue, SW  
 Washington, DC 202-1100  
 Customer Service Hotline:  
 800-421-3481  
 Fax: 202-453-6012  
 TDD#: 877-521-2172  
 Email: [OCR@ed.gov](mailto:OCR@ed.gov)  
 Web: <http://www.ed.gov/OCR>

**Equal Employment Opportunity  
 Commission (EEOC)**  
 Reuss Federal Plaza  
 310 West Wisconsin Avenue, Suite 500  
 Milwaukee, WI 53203-2292  
 Phone: 1-800-669-4000  
 Fax: 414-297-4133  
 TTY: 1-800-669-6820  
 ASL Video Phone: 844-234-5122  
 Web: <http://www.eeoc.gov>

### Anonymous Reporting

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<sup>9</sup> Formal Complaint is a document submitted or signed by the Complainant or signed by the Title IX Coordinator if there is a compelling threat to the health and/or safety of the campus community which alleges a policy violation by a Respondent who is a student or employee and requests an investigation of the allegation.

Anonymous reports are accepted but may require additional investigation. Western tries to provide supportive measures to all Complainants, which is impossible with an anonymous report. Because reporting carries no obligation to initiate a formal response, and as Western respects Complainant requests to dismiss complaints unless there is a compelling threat to health and/or safety, the Complainant is largely in control and should not fear loss of privacy by making a report that allows the College to discuss and/or provide supportive measures.

### **Amnesty**

Western encourages the reporting of discrimination and harassment incidents or concerns, and maintains a policy of offering parties and witnesses amnesty from minor policy violations related to the incident, such as underage drinking or use of illicit drugs.

### **False Allegations**

Deliberately false and/or malicious accusations under this policy are a serious offense and will be subject to the appropriate disciplinary action. This does not include allegations that are made in good faith but are found to be erroneous or do not result in a policy violation determination. In addition, witnesses and parties that knowingly provide false evidence, tamper with or destroy evidence, or deliberately mislead an official conducting an investigation can be subject to appropriate disciplinary action.

### **Federal Timely Warning Obligations**

The College is required to issue timely warnings to the campus community for reported incidents that pose a serious or continuing threat of bodily harm or danger to the community including reports of sexual assault, dating violence, domestic violence and/or stalking that meets this threshold. In such cases, Western will ensure that a Complainant's name and other identifying information is not disclosed while providing enough information for campus community members to make safety decisions in light of the potential danger.

### **Promptness**

Western will act upon all allegations received through notice or formal complaint in a prompt manner. The timeline for complaint resolution is generally 60-90 calendar days. Western will make every attempt to avoid all undue delays within its control. Any time the general timeframes for resolution outline in the appropriate grievance procedure will be delayed, the College will provide written notice to the parties of the delay, the cause of the delay, and estimated extension of timeframe.

### **Privacy**

Western will make every effort to preserve the privacy of reports received under this policy. The College will not share student identifiable information of any involved parties in complaints of harassment, discrimination, or retaliation except as permitted by the Family Educational Rights and Privacy Act

(FERPA)<sup>10</sup> or to carry out the purpose of Title IX regulations<sup>11</sup>, including the conducting of any investigation, hearing, or grievance proceeding arising under these policies and procedures.

Western reserves the right to determine which College officials have a legitimate educational interest in being informed about incidents that fall within this policy, pursuant to FERPA. Information will be shared as necessary with Investigators, Decision Makers, witnesses, and the parties.

### **Supportive Measures**

Western will offer and implement appropriate and reasonable supportive measures to involved parties upon notice of alleged harassment, discrimination, and/or retaliation. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the College's education program or activity without unreasonably burdening either party. Supportive measures may include services designed to protect the safety of all parties or the College educational environment, and/or to deter harassment, discrimination and/or retaliation.

Examples of supportive measure include, but are not limited to:

- Referral to counseling, medical or support services
- Referral to community-based providers
- Modifications to class or work schedules
- Altering campus housing assignments
- Safety planning
- Academic support or adjustments
- Leave of absence
- Increased security monitoring
- Mutual no contact order
- Any other action deemed appropriate by Title IX Coordinator

Violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement.

### **Emergency Removal**

Western may remove a student Respondent entirely or partially from their educational program or activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator in conjunction with the College Care Team using its standard objective violence risk assessment procedures. Students subject to emergency removal have the right to appeal to the Title IX Coordinator such action prior to implementation to show cause why the action should not be implemented or should be modified. Western will implement the least restrictive emergency actions possible in light of know circumstances and safety concerns.

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<sup>10</sup> 20 U.S.C. 1232g and 34 CFR part 99

<sup>11</sup> 34 CFR Part 106

Employees of Western may be placed on paid administrative leave during the investigation and resolution of the grievance process. The Title IX Coordinator and the Director of Human Resources will make the determination related to placing an employee on administrative leave.