

RVU TITLE VI POLICY

Date of Initial Approval: 11/14/2024

Date Revised: 02/28/25

Category: University Policy

Responsible Office: RVU Compliance Office

Stakeholders Involved in Review: Chief Compliance Officer, MSBS Program Director, Student Affairs, Compliance Office, Provost's Advisory Council, Leadership Council

PURPOSE & SCOPE

The purpose of this policy is to ensure compliance with Title VI of the Civil Rights Act of 1964. Title VI states, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Title VI is also considered to prohibit discrimination based on shared ancestry or ethnic characteristics. Title VI protects anyone, regardless of citizenship or lawful presence in the United States. It also protects individuals from retaliation for filing a complaint, participating in an investigation, or opposing discriminatory practices. This policy applies to all students, faculty, staff, and visitors of Rocky Vista University (RVU or University).

POLICY STATEMENT

Rocky Vista University is committed to providing an inclusive and welcoming environment for all students, employees, and visitors. Discrimination based on race, color, shared ancestry, or national origin is strictly prohibited. The University will take prompt action to address any complaints of discriminatory behavior to ensure compliance with Title VI.

ROLES & RESPONSIBILITIES

Compliance Office and Title VI Coordinator	<p>The Title VI Coordinator is responsible for overseeing the implementation and monitoring of this policy, managing complaints, and ensuring compliance with Title VI. The Title VI Coordinator will also provide training and resources to the University community.</p> <p>The Title VI Coordinator will conduct thorough and impartial investigations when required. This may include interviews, document reviews, and other relevant steps.</p> <p>The Title VI Coordinator will determine whether a violation of this policy has occurred and recommend appropriate corrective actions in consultation with Student Affairs Associate Deans for student complaints and in consultation with HR for employee complaints.</p>
Title VI Appeals Officer	Will review appeals
Senior University Leadership	The senior university leadership is responsible for supporting the Title VI Coordinator, ensuring that all University policies and practices comply with Title VI, and promoting a culture of inclusivity.
Faculty and Staff	Faculty and staff are responsible for understanding and adhering to this policy, participating in training, respecting the rights of others, fostering an inclusive environment in their respective areas, and reporting any incidents of discrimination to the Title VI Coordinator.

Students	Students are responsible for understanding and adhering to this policy, participating in training, respecting the rights of others, fostering an inclusive environment in their respective programs, and reporting any incidents of discrimination to the Title VI Coordinator.
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RELATED PROCESSES, PROCEDURES, AND/OR DEFINITIONS

Processes and Procedures (Appendix 1)

- **Complaint Filing:** Any individual who believes they have been subjected to discrimination based on race, color, or national origin may file a complaint with the Title VI Coordinator. Complaints should be filed within 180 days of the alleged discriminatory act. Reports can be made to the Title VI coordinator, or via Ethics Point at: <https://secure.ethicspoint.com/domain/media/en/gui/74585/index.html>
- If you cannot resolve your complaint on an institutional level, you have the right and option to file a complaint with the U.S. Department of Education, Office for Civil Rights at: <https://www.ed.gov/laws-and-policy/civil-rights-laws/file-complaint>
- **Investigation:** Upon receiving a complaint, the Title VI Coordinator will conduct a thorough and impartial investigation. This may include interviews, document reviews, and other relevant steps. The Title VI coordinator will determine if a hostile environment exists based on the preponderance of evidence and assess whether the student's participation in university activities has been limited.
- **Decision:** The Title VI Coordinator will determine whether a violation of this policy has occurred and recommend appropriate corrective actions. This will occur in consultation with Student Affairs Deans for student complaints and in consultation with the Vice President of HR for employee complaints.
- **Resolution:** The complainant and the respondent will be informed of the outcome and offered resources and supportive measures. Appeal options will be outlined.
- **Appeals:**
 - Either party may appeal the decision of the Title VI Coordinator to a designated Title VI Appeal official within 10 business days of receiving the decision. Either party may subsequently appeal the decision of the Title VI Appeal Officer to the President within 10 business days of receiving the decision.
- **Training and Education:** The University will provide mandatory, ongoing training and education to students, faculty, and staff to ensure awareness and understanding of Title VI and this policy.

Definitions

- **Discrimination:** Unfair or unequal treatment of an individual or group based on race, color, or national origin.
- **Hostile Environment:** "A hostile environment exists where there is conduct (e.g., physical, verbal, graphic, or written) that is sufficiently severe, pervasive, or persistent so as to interfere with or limit the ability of an individual to participate in or benefit from the services, activities, or privileges provided by a school or college" **(US Department of Education)**
- **Title VI Coordinator:** The designated University official responsible for ensuring compliance with Title VI.
- **Title VI Appeal Officer:** The appointed University official responsible for reviewing appeals.
- **Complainant:** The individual who files a complaint alleging discrimination.
- **Respondent:** The individual or entity against whom a complaint is filed.
- **Senior University Leadership:** Includes members invited to attend the quarterly Senior University Leadership Forum.

POLICY REVISION HISTORY

02/28/25 – ADDED INFORMATION ON FILING A COMPLAINT WITH THE OFFICE OF CIVIL RIGHTS (OCR)