
Title VI Procedures

About These Procedures

Effective Date:	January 27, 2025
Responsible Office:	Title VI Office
Related Policy:	Nondiscrimination Policy (CAM HR-48)
Link to this document:	https://go.illinois.edu/tvi-procedures
To learn more:	https://diversity.illinois.edu/institutional-equity/title-vi-coordinator/
	Phone: 217-300-1311
	Email: TitleVIOffice@illinois.edu

1. Introduction

The University of Illinois Urbana-Champaign (“University”) is committed to ensuring that its learning and working environments are free from all forms of discrimination, harassment, and related retaliation. These procedures outline the resolution process that will be used by the Title VI Office to address a Report of harassment, discrimination, and/or retaliation based on race, color, or national origin, including actual or perceived shared ancestry or ethnic characteristics, as prohibited by Title VI of the Civil Rights Act of 1964.

In administering these procedures, the Title VI Office will consult with campus partners as necessary and delegate tasks as appropriate.

2. Scope

The Title VI Office is primarily responsible for overseeing and coordinating the University’s response to Reports of Title VI Misconduct and will receive all such Reports. Reports may be made directly to the Title VI Office. In addition, any Reports of Title VI Misconduct made to University offices, departments, colleges, and units, including but not limited to Campus Belonging, Housing, the Office for Student Conflict Resolution (“OSCR”), the Equal Employment Opportunity Division of the Office for Access and Equity (“OAE”), and the University of Illinois Police Department (“UIPD”), will be forwarded to the Title VI Office. See Section 5 below for ways in which to make a report.

The University retains the right to interpret these procedures in any way that is not clearly unreasonable. The University may adjust these procedures as needed in order to ensure that the

rights of all parties and the interests of the University and the campus community are protected. Any such adjustments to procedures will be communicated to affected parties in a reasonable time, which may include after a Report has been received or an investigation has commenced, provided that such adjustments are not unfairly prejudicial to any party and do not interfere with the due process rights of any party or any other right protected by applicable law, regulation, policy, or contract.

The procedures set forth in this document will not be utilized to resolve Reports that do not involve allegations of Title VI Misconduct.

3. Definitions

Affected Individuals means both people who are directly (Complainants) and indirectly affected by conduct, while participating in a University Program or Activity, that could constitute Title VI Misconduct under the Nondiscrimination Policy.

Color means a person's skin pigmentation, complexion, shade, or tone.

Complainant means a person directly affected by conduct that could constitute Title VI Misconduct under the Nondiscrimination Policy.

Complaint means an oral or written request to the University that objectively can be understood as a request for the University to investigate and make a determination about alleged Title VI Misconduct under the Nondiscrimination Policy.

Days mean business days.

University Program or Activity means all the operations of the University.

National Origin means a place where an individual or their ancestors are from and any shared physical, cultural, or linguistic characteristics of that place. Protections against national origin discrimination extend to individuals who experience discrimination, including harassment or related retaliation, based on an individual's actual or perceived: (i) shared ancestry or ethnic characteristics, *or* (ii) citizenship or residency in a country with a dominant religion or distinct religious identity. This includes individuals who are or who are perceived to be Arab, Buddhist, Christian, Hindu, Israeli, Jewish, Muslim, Palestinian, Sikh, South Asian, or any other faith or ancestry, when the discrimination is based on their shared ancestry or ethnic characteristics. National origin discrimination does not include discrimination based solely on religion. Discrimination based on national origin may include ethnic or ancestral slurs or stereotypes; harassment based on how individuals look or dress in ways linked to ethnicity or ancestry (*e.g.*, skin color, religious attire); and discrimination based on language associated with a shared ancestry, including an individual's accent or name.

Parties/Party means the Complainant(s) and Respondent(s), collectively and individually.

Preponderance of the Evidence Standard means the standard of review for determining if a hostile environment was created. Under this standard, the evidence needs to show that the facts are more likely to be true than not before making a determination.

Race means a person's actual or perceived race, or association with a person of a certain race. Race is a social construct used to divide people into generalized groups based on physical appearance and/or physical characteristics (such as hair texture, skin color, or certain facial features).

Remedies means measures provided, as appropriate, to a Complainant or any other person the University identifies as having had their equal access to the University's Program or Activity limited or denied by Title VI Misconduct. These measures are provided to restore or preserve that person's access to the University's Program or Activity after the University determines that Title VI Misconduct occurred.

Report means when an employee, student, or third party informs the Title VI Office of an alleged occurrence of Title VI Misconduct.

Respondent means a person who is alleged to have engaged in Title VI Misconduct.

Sanction means a consequence imposed by the University on a Respondent who is found to have violated the Nondiscrimination Policy or the Student Code.

Shared Ancestry means a component of National Origin, as described above.

Title VI Misconduct means alleged discrimination, harassment, or related retaliation as described in the Nondiscrimination Policy based on race, color, or national origin, including actual or perceived shared ancestry or ethnic characteristics, as protected by Title VI, whether it occurs on or off campus, on social media, or involves students, university personnel, and/or members of the public who enter the University's campus.

4. Examples of Shared Ancestry or Ethnic Characteristic Discrimination

Below is a non-exhaustive list of examples of conduct that may constitute Title VI Misconduct which can manifest in the University environment.¹ The examples provided may apply to both directly and indirectly affected individuals.

¹ Examples taken from the United States Department of Education Office for Civil Rights' May 7, 2024 Dear Colleague letter found [online](#) and July 2, 2024 Fact Sheet: Harassment based on Race, Color, or National Origin on School Campuses found [online](#).

These examples do not predict or determine the outcome of a Report that the Title VI Office or any other University office may resolve and/or adjudicate.

- a. Several students are subjected to the repeated use of racial slurs, including the n-word. Other students raise their fists during class to mock the Black power symbol and create a club called the Kool Kids Klub, which they refer to as the KKK. During KKK meetings, the confederate flag is displayed. Students also mock police killings of Black people and state that Black people do not deserve to live. The students are now avoiding campus.
- b. Several students are subjected to racial slurs and insults, including statements that Asian students should “go back to their country” and “eat a dog.” The students who have experienced these statements no longer want to attend class.
- c. A Lebanese student files a harassment complaint with the University alleging that an employee has treated them less favorably in several situations, referred to them as an “ignorant Arab” and told another staff member that there are “too many Muslims in this country.”
- d. A student who recently immigrated from El Salvador reports that they were physically assaulted by another student on campus. During the assault, the other student yelled “Welcome to America!”
- e. A Jewish student has a dry-erase board on her dorm room door defaced with swastikas. She alleges that epithets referencing poor hygiene and racial impurity of Jewish people and white supremacist slogans stating conspiracy theories about Jewish people were scrawled on the door and posted by fellow students as comments to her social media feed. The student no longer feels comfortable going to her dorm.
- f. An Arab Muslim student who wears a hijab is harassed by other students when several peers pull off the student’s hijab, throw it on the ground, stomp on it, and call her a terrorist. Later, a witness to this incident tells the student that because she does not wear loose fitting clothing every day she should not be concerned because she was already being a bad Muslim. The student feels unsafe and cannot concentrate in class.
- g. A registered student organization plans an event to screen a video by an Israeli filmmaker about his observations from Israel. In response, several dozen students and faculty members block access to the building explaining they do not want to spread Jewish propaganda. The event is moved, but the protestors congregate outside the new location and begin chanting epithets about Jews. The students at the event find the yelling distracting and fearsome.
- h. A large group of students, including Jewish, Arab, Muslim, and other students, gather to “show solidarity with Gaza.” Several dozen counter-protesters arrive at the protest. Counter-protesters shout things at Arab student protesters like “terrorist” and “second Nakba.”

Counter-protesters physically attack some of the student protestors. Many Arab and Muslim students avoid campus and skip in-person classes for the foreseeable future.

5. Reports or Complaints of Title VI Misconduct

5.1 Where to Make a Report.

Reports of Title VI Misconduct may be made directly to the Title VI Office. In addition, any University office, unit, department, or college that receives a Report of or observes an instance of Title VI Misconduct must report such to the Title VI Office. University employees with supervisory or management responsibilities are obligated to report any and all observations and complaints of Title VI Misconduct to the Title VI Misconduct Office.

If another campus unit, including but not limited to Campus Belonging, Housing, OAE, OSCR, or UIPD, learns of an allegation of Title VI Misconduct during the course of addressing a matter within their jurisdiction, the respective office will forward the information to the Title VI Office for handling pursuant to these procedures.

The Title VI Office may, at its discretion, coordinate with other University offices or units in responding to Reports of Title VI Misconduct, including but not limited to: OAE, OSCR, Housing, and UIPD.

5.2 How to Make a Report.

Reports or Complaints of Title VI Misconduct may be made using any of the following options:

- a. File a Report or Complaint with, or give notice to, the Title VI Coordinator. Such a Report may be made at any time (including during non-business hours) by telephone (217-300-1311) or email (TitleVIOffice@illinois.edu), or by mail to the office address (614 East Daniel St., Suite 303, Champaign, IL 61820).
- b. Report online, using the reporting form posted at go.illinois.edu/TitleVICoordinator. Anonymous Reports are accepted, but the Report may give rise to a need to try to determine the Parties' identities. Anonymous Reports typically limit the University's ability to investigate, respond, and provide remedies, depending on what information is shared. Measures intended to protect the community or redress or mitigate harm may be enacted. It also may not be possible to provide supportive measures to Complainants who are the subject of an anonymous Report.

6. Report Resolution

6.1. Evaluation

The Title VI office is responsible for overseeing and coordinating the University's response to Reports of Title VI Misconduct. Upon receipt of a Report, Title VI Office staff will evaluate whether the allegations are within the scope of Title VI Misconduct. In conducting this evaluation, the Title VI Office will consider how the involved individuals are affiliated with the University and the forum in which the conduct occurred. If the Report falls within the scope of Title VI Misconduct, the Title VI Office will be responsible for overseeing resolution of the Report, including all steps set forth in Section 6, and coordinating the University's response.

Reports that meet the criteria for Title VI but relate exclusively to conduct between employers and/or employees in the course of their employment, will be categorized as Title VII and not Title VI and therefore be referred to OAE. The Title VI Coordinator will retain a record of the Report and will obtain a summary of the outcome or conclusion, but will not have any oversight of subsequent process.

6.1.1. Intake Meeting

Upon receipt of a Report alleging Title VI Misconduct, Title VI Office staff will send initial outreach via email requesting a meeting with the Complainant (if identified).² Initial outreach will be done within two days of receiving the Report and available meeting times will be provided in the outreach. The purpose of the meeting is to gather additional information about the reported conduct and the individuals involved, understand how the Complainant has been impacted, provide the Complainant with campus and community resources, identify supportive measures, explain the process as delineated within these procedures, identify other Affected Individuals if possible, and discuss how the Complainant wishes to resolve the matter.

If it is clear from the Report that another office may need to be involved in the matter, Title VI Office staff may be accompanied in the intake meeting with a representative of such office. If the Title VI Office is going to include a representative from another office, the Complainant will be notified by email in advance of the meeting.

The Title VI Office will attempt outreach to the Complainant at least three times in an effort to address the conduct raised in the Report.

² Where the matter was reported to Title VI by Housing, Housing will send outreach to the Complainant with the Title VI Coordinator copied. Staff from both Housing and the Title VI Office will meet with the student should they respond and set up a meeting.

After the initial meeting, or after unsuccessful attempts to meet with the Complainant, Title VI Office staff will conduct outreach to other Affected Individuals identified and determine whether there are other ways to identify additional Affected Individuals.

If there are immediate threats to physical safety, Title VI staff will share information with UIPD and the Threat Assessment Team and encourage the target(s) of the threat(s) to do the same.

6.1.2. Supportive Measures

The University will offer and implement appropriate and reasonable supportive measures to those involved in a Report of Title VI Misconduct. Through intake interviews with the Affected Individuals, the Title VI Office staff will assess which supportive measures the individuals are interested in receiving and ensure that their wishes are considered with respect to any planned and implemented supportive measures. As soon as possible, during or after the intake meeting, Title VI Office staff will work to put supportive measures in place for the Affected Individuals as appropriate.

Supportive measures can be implemented by a variety of different offices on campus. To implement supportive measures, Title VI staff will work with other offices including, but not limited to, the Counseling Center, Faculty Staff Wellness Assistance Services, OSCR, Housing, Campus Belonging, the Connie Frank CARE Center, UIPD, Illinois Human Resources, Accessibility and Accommodations Division, and Disability Resources and Educational Services. Examples of supportive measures that could be requested include but are not limited to: counseling services, no-contact directives, class schedule changes, course/program-related adjustments, adjustments to the working environment, no-trespass notice, SafeRides, SafeWalks, safety planning, limiting and/or scheduling access to individual buildings, altering housing assignments and/or dining hall, increased security and monitoring of certain areas of campus, and training/education programs related to Title VI Misconduct.

The University will maintain the privacy of the supportive measures, provided that privacy does not impair the University's ability to provide those supportive measures. The University will implement measures in a way that does not unreasonably burden any Party and will endeavor to minimize the academic/occupational impact on the Parties.

Violations of no contact orders or other restrictions included in a supportive measure may be referred to appropriate student or employee conduct processes for enforcement.

6.1.3. Posted Materials, Displays, Graffiti, or Vandalism

If the Title VI Misconduct involves posted materials, displays, graffiti, or vandalism, in violation of University Policy, including but not limited to the [Expressive Activity On Campus Policy](#) and the [Outdoor Displays Policy](#), the Title VI Office will promptly act to ensure that the offending item(s) or mark(s) is removed from University property as soon as possible. The Title VI Office will request that photographic evidence of the item(s) or mark(s) be taken before removal. UIPD and/or Facilities and Services may be involved in removing the item(s) or mark(s).

6.1.4. Preliminary Inquiry

Once Title VI Office staff have spoken with the Complainant and other Affected Individuals, if known, or made unsuccessful efforts to do so, they will engage in a preliminary inquiry as appropriate. This includes, but is not limited to, gathering evidence of and interviewing witnesses to the alleged Title VI Misconduct.³

The preliminary inquiry seeks to find out more detail about what, where, when and how the Title VI Misconduct occurred. Tangible evidence will be sought, collected, and maintained by the Title VI Office. Title VI staff will aim to complete the preliminary inquiry within 20 days of meeting with the Complainant.

6.1.5. Request for Anonymity, No Action, or Informal Resolution

Every effort will be made to protect the privacy interests of the Affected Individuals in a manner consistent with the need for a prompt and effective response to a Report or Complaint. If an Affected Individual requests that their name or other identifiable information not be shared, does not want the matter referred to OAE or OSCR for an investigation to take place, or does not want the Report to be pursued in any other manner, the Title VI Coordinator or their designee shall evaluate such request in light of the duty to ensure the safety of the University and to comply with state and federal law.

In evaluating a request for no action or an informal resolution, the Title VI Coordinator has discretion to collaborate with appropriate stakeholders, and will consider the following factors: the Complainant's wishes, the impacts on the Complainant's feelings of safety should a formal investigation proceed, the severity of the conduct, the scope of the conduct, the level of control the University has over the Respondent, the ability to investigate the matter without the Complainant's involvement, the risk of continued harm to the University community, the relationship of the parties to each other, whether the University could end the alleged Title VI misconduct without initiating a formal investigation, and any other factors the Title VI coordinator determines relevant to the particular situation involved.

In instances where the report is made anonymously or there is a request for anonymity, the Title VI Coordinator determines whether, and in what manner, the University proceeds in responding to a Report of Title VI Misconduct. The Title VI Coordinator may coordinate with OAE, OSCR, or University Housing so that they may follow their processes as appropriate. In cases where the Title VI

³ For reports of Title VI Misconduct that originate in Housing, a staffing will be held that may include the following staff members, subject to their availability: the Assistant Director of Community Standards, Assistant Director of Staffing, Area Coordinator, Resident Director, Assistant Director of Inclusion and Leadership, Program Coordinator of Inclusion and Leadership. The Title VI Coordinator or their designee will be present for all staffings that address Title VI Misconduct. The staffing will be held as soon as possible after meeting with the Complainant, but no more than 5 days later.

Coordinator coordinates with another office for investigation pursuant to this section, the Title VI Coordinator does not become a Party to the investigation. Title VI staff will notify the Complainant of the determination regarding their request for no action, anonymity, or informal resolution before proceeding as determined. The goal is to provide the Complainant with as much control over the process as possible, while balancing the University's obligation to protect its community.⁴

If the University honors the request for anonymity, or the Report is anonymous, or the individual who made the report or other affected individuals do not proceed with a formal complaint the University may be limited in how it proceeds, but will determine if additional investigative and/or remedial steps are nonetheless necessary if it has actual or constructive notice of a potential hostile environment. The University will take other appropriate steps designed to eliminate Title VI Misconduct, prevent its recurrence, and remedy its effects on the Complainant (if known) and the University community.

6.1.6. Free Speech and Academic Freedom Considerations

Once the steps enumerated in section 6.1.1 through 6.1.6 of these procedures have been taken, as appropriate, the Title VI Office will consider whether the alleged Title VI Misconduct involves speech or expressive activity protected by the First Amendment of the U.S. Constitution or principles of academic freedom. Title VI Office staff may consult with stakeholders in making this determination.

Free speech and academic freedom are foundational to the University's mission. To learn more about the University's commitment to free speech and expression, visit Strategic Communications and Marketing's [Free Speech and Expression](#) page.

The University is cognizant that expressive activity protected by the First Amendment or principles of academic freedom may still create a hostile environment in a University Program or Activity. In such cases, the Title VI Office will not coordinate with OSCR or OAE because these offices discipline or recommend discipline at the end of a formal grievance process. Cases involving free speech may be resolved by the Title VI Office.

6.2. 6.1.7. Coordinating with OSCR, OAE, and University Housing

While the Title VI Office maintains responsibility and oversight for Reports of Title VI Misconduct, there may be situations in which the Title VI Office must coordinate with OAE, OSCR, or University Housing in response to a Report. This coordination is to ensure that OSCR and OAE's respective

⁴ Title VI staff will report allegations of Sex-Based Misconduct to the Title IX Office as required of responsible employees regardless of the Affected Individual's preference. Similarly, Title VI staff will report suspected child abuse or child neglect to the Department of Child and Family Services per the requirements of the Illinois Abused and Neglected Child Reporting Act.

processes may be followed in parallel with the Title VI Office processes with respect to Title VI Misconduct and hostile environment analysis.

Once the initial meeting and Preliminary Inquiry have been conducted, the Title VI Office will determine whether coordination with OSCR, OAE, or University Housing is required based on each office's scope and jurisdiction. The Title VI Office will also consider the following factors in making this determination: how the Parties are affiliated with the University, including whether one or more of the Parties are students or University employees, the substantive content of the report, whether a potential Student Code violation is implicated, whether protected speech or academic freedom are implicated, and any other pertinent factors involved in the situation.

OAE. The Title VI Office will coordinate with OAE if the Report involves a potential violation of the Nondiscrimination Policy and involves a Respondent who is a staff member, faculty member, student employee, or other category of employee. OAE has jurisdiction to adjudicate complaints in which a Complainant alleges that a staff member, faculty member, student employee, or other categories of employees violated the Nondiscrimination Policy. The [Office for Access and Equity](#) can be reached at (217) 333-0885, option #2 or eeodivision@illinois.edu. Complaints coordinated with OAE shall be addressed pursuant to the [Nondiscrimination Procedures](#).

OSCR. The Title VI Office will coordinate with OSCR if the Report involves a potential Student Code violation. OSCR has jurisdiction over complaints against students or student organizations pursuant to the Student Code. The [Office for Student Conflict Resolution](#) can be reached at (217) 333-3680 or conflictresolution@illinois.edu. Complaints coordinated with OSCR shall be addressed pursuant to Student Disciplinary Procedures as described in the [Student Code](#).

University Housing. The Title VI Office will coordinate with University Housing if the Report involves conduct that took place within a University residence hall. University Housing can be reached at (217)333-0770 or conductcases@illinois.edu. Complaints coordinated with University Housing shall be addressed pursuant to these procedures.

When coordinating with OAE, OSCR, or University Housing the Title VI Office will share all gathered information with the respective office. Additionally, the Title VI Coordinator will oversee the work done by the respective office on the Title VI Report. The Title VI Coordinator will receive periodic updates as each office conducts its work. As necessary, the Title VI Coordinator will consult with the respective offices on the Title VI Office's assessment of whether a hostile environment was created in a University Program or Activity. The Title VI Office will review any final written report before it is issued to the parties (where applicable), be included in any meetings conducted with stakeholders regarding the investigation, be included in the determination of appropriate sanctions (where applicable), and ensure notices of closure are sent to those involved once the matter is closed in the respective office.

6.2.1. Coordinating with UIPD

Title VI Office staff will inform Affected Individuals that they have the option to file a police report with UIPD when the alleged Title VI Misconduct could also constitute a violation of criminal law. UIPD will proceed at their discretion once an Affected Individual files a police report, which may include conducting a criminal investigation.

In determining whether to file a report with UIPD, Affected Individuals should be aware that UIPD Officers and staff are not confidential resources, and their records are not protected by Family Educational Rights and Privacy Act (“FERPA”). Additionally, police reports are retained indefinitely unless specific action is taken to expunge them. Furthermore, filing a police report does not guarantee that the Champaign County State’s Attorney’s Office will file criminal charges regarding the reported conduct.

When a matter is reported to UIPD, the Title VI Office will continue with their process as laid out in these procedures.

At the request of UIPD, the Title VI Office may agree to temporarily suspend its preliminary inquiry or fact finding for a brief period during a criminal investigation. The Title VI Office will promptly resume its preliminary inquiry or fact finding once law enforcement has concluded its evidence gathering. Neither a Complainant’s decision to file a police report nor the State’s Attorney’s Office’s decision to file a criminal case determines the outcome of any inquiry under these procedures.

6.3. Hostile Environment Assessment and Determination by the Title VI Office

The Title VI Office is responsible for assessing whether incidents of reported Title VI Misconduct have created a hostile environment within a University Program or Activity.

The Title VI Office will make this assessment regardless of whether the conduct occurred on campus, off campus, or on social media. Conduct that occurs off campus, that is carried out by an unaffiliated respondent, or that occurs on social media, may contribute to a hostile environment if it creates, based upon the totality of the circumstances, a hostile environment within a University Program or Activity. Title VI Misconduct creates a hostile environment when, based on the totality of the circumstances, the conduct is unwelcome; is based on race, color, or national origin including shared ancestry or ethnic characteristics; is subjectively and objectively offensive; and so severe or pervasive that it limits or denies a person’s ability to participate in or benefit from the University’s education Program or Activity.

As an initial matter, Title VI Office staff will review and consider all information gathered in the preliminary inquiry. Title VI Office staff may do additional factfinding to include interviewing the Respondent, if appropriate based on the totality of the circumstances. Once any additional fact gathering is concluded, the Title VI Office will draft a summary of the steps taken and create an evidence packet of the information collected.

The Title VI Office will then engage in an objective evaluation of all the relevant information gathered to assess, by the preponderance of the evidence standard, whether a hostile environment has been created in a University Program or Activity. Once the Title VI Office staff have determined whether a hostile environment was created, Title VI Office staff will commit the determination to writing.

The notice of outcome, including the written determination and remedial actions the University has taken or will take that is reasonably calculated to eliminate discriminatory conduct, prevent its recurrence, and address its effects on Affected Individuals will be shared with Affected Individuals as appropriate, subject to any state and federal confidentiality obligations, including but not limited to FERPA.

Title VI Office staff will endeavor to issue the notice of outcome within 90 days of receiving the report.

If the Title VI Office coordinates with OAE, OSCR, or University Housing, the Title VI Coordinator may consult with the respective offices in conducting the hostile environment assessment. Where the Title VI Office is coordinating with OAE, OSCR, or University Housing, Title VI Office staff will issue a notice of outcome within 10 days the respective office concluding their process.

6.4. Steps to Address Title VI Misconduct

The University, upon direction by the Title VI Office, will take appropriate action to address a Report regardless of whether it was determined that a hostile environment was created. Any action taken in response to a Report, or to end a hostile environment in a University Program or Activity, will align with obligations and limitations that the University has under the First Amendment of the U.S. Constitution.

The Title VI Office will implement remedial measures reasonably designed to eliminate Title VI Misconduct, prevent its recurrence, and to address its effects, including when it involves flyers, posters, or graffiti, and other similar vandalism on campus, actions of student organizations, or social media activity.

The Title VI Office will work with other University offices, including but not limited to Housing, Campus Belonging, UIPD, Illinois Human Resources, and CARE in implementing remedial measures. Campus Belonging may offer facilitated discussions, mediation, restorative services, education, and training. University Housing may also provide mediation, one-on-one conversations with Affected Individuals that seek to repair harm, one-on-one educational conversations with Respondents, facilitated conversations or dialogues, and passive or active educational programs.

Below is a non-exhaustive list of remedial measures the University may implement, depending on the facts of a particular situation:

- a. Communicate the University's opposition to conduct that is antithetical to the University's values and its commitment to fully include students and personnel of all races, colors, and national origins.
- b. Facilitate restorative justice processes with the involved individuals.
- c. Facilitate mediation between the affected individuals and those alleged to have engaged in Title VI Misconduct.
- d. Facilitate passive educational campaigns in affected areas of campus.
- e. Conduct community events designed to encourage community dialogue.
- f. Refer students and personnel to campus and community supportive resources.
- g. Offer individualized support to the student or employee who experienced the conduct.
- h. Facilitate training and/or educational activities for appropriate groups as indicated by the Report.
- i. Monitor whether further incidents are experienced by the affected individuals.
- j. Engage in assessments of the larger climate periodically.
- k. Reach out to community organizations to determine how the University can support the affected individuals/communities who are also members of the University.
- l. Permanent alteration of work arrangements.
- m. Permanent alteration of housing assignments.
- n. Course and registration adjustments, such as retroactive withdrawals, as requested.
- o. Implementation of long-term contact limitations between the Parties.

At the discretion of the Title VI Coordinator or their designee, certain supportive measures may also be provided to the Parties regardless of whether a hostile environment is found.

OAE or OSCR may recommend sanctions as appropriate at the conclusion of their own separate respective processes. Sanctions may include, but are not limited to, educational conversations, training, discipline, discharge, termination, withdrawal from an academic program, and recommendations to pursue revocation of tenure and dismissal. These remedial measures will be reasonably calculated to eliminate the discriminatory conduct, prevent its recurrence, and address its effects on Affected Individuals. In light of the fact that the Title VI Office maintains oversight of the report, OAE and OSCR will communicate with the Title VI Office regarding the report and any

investigation or outcome, and the Title VI Office will use such information to conduct the hostile environment analysis and to assess whether any additional action is required.

Where the matter was referred to UIPD, criminal charges may be filed by the Champaign County State's Attorney's Office, and if adjudicated guilty, court ordered sentences imposed.

7. Conflicts of Interest

7.1. Complaint against the Title VI Office

When there is a Report of Title VI Misconduct against the Title VI Coordinator or other Title VI Office staff, the Vice Chancellor for Diversity, Equity and Inclusion designates an appropriate Investigator or administrator for purposes of implementation of these procedures. The designated Investigator or administrator must have the requisite training and experience and have no conflict of interest or prior involvement in the case. The designated Investigator or administrator could include, but is not limited to, an external Investigator or an official from the University of Illinois at Springfield or the University of Illinois at Chicago, subject to the concurrence of the President or the respective Chancellor, as appropriate. Additionally, the Vice Chancellor for Diversity, Equity, and Inclusion will designate an appropriate administrator to serve in the role of the Title VI Coordinator for the limited purpose of overseeing the investigation into the Title VI Coordinator or Title VI staff.

The Complainant can submit a complaint directly in writing to the Chancellor of the University of Illinois Urbana-Champaign, 516 Swanlund Administration Bldg., 601 E. John Street M/C 304, Champaign, IL 61820, 217-333-6290.

7.2. Complaint against the Chancellor

When there is a Report of Title VI Misconduct against the University of Illinois Urbana-Champaign Chancellor, the Complainant should submit a complaint in writing to either the Title VI Office or directly to the President of the University of Illinois, 364 Henry Administration Bldg., 506 S. Wright St. Urbana, Illinois 61801, (217-333-3071). If the complaint comes to the Title VI Office, the Title VI Office will route the complaint to the President. The President will consult with appropriate individuals to designate an appropriate Investigator or administrator for purposes of implementation of the applicable policy and procedures.

8. Other Provisions

8.1. Confidentiality, Privacy, and Anonymity

While every effort is made to preserve the privacy of Reports, Parties, and witnesses, the University cannot guarantee confidentiality or anonymity to anyone participating in the Title VI process. Information about Parties and witnesses, including their identity and what information they share

with the Title VI office is shared with those individuals involved in the resolution of a complaint who have a need to know. The Title VI Office will share information with other University personnel in limited situations as necessary. The University will not share the identity of Reporters, Complainants, Respondents, or witnesses, except as permitted by FERPA, 20 U.S.C. 1232g; FERPA regulations, 34 CFR part 99; or as required by law; or to carry out any preliminary inquiry and assessment arising under these policies and procedures.

The Title VI Office may share anonymized, aggregated information about Reports with relevant personnel for the purpose of allowing unit, department, college, or University leadership to determine what independent action could be taken to learn about and improve their respective culture and/or learning/working environment.

8.2. Duty to Cooperate

All people involved in these procedures are expected to cooperate and provide truthful information throughout the process.

8.3. Promptness

All Reports are acted upon promptly once notice or a Report is received. However, extenuating circumstances can cause delays. The University will avoid all undue delays within its control and provide written notice to the Parties of the delay, the cause of the delay, and an estimate of the additional time that will be needed as a result. Factors that may cause delay include a high volume or complexity of information, impacted or involved parties that are slow to respond to the Title VI Office, and overall workload of the Title VI Office Staff.

8.4. False Allegations and Evidence

Deliberately false and/or malicious accusations under these procedures (as opposed to allegations which, even if erroneous, are made in good faith) are a serious offense and will be subject to appropriate disciplinary action under the [University of Illinois System Code of Conduct](#) or the [University of Illinois Student Code](#). Furthermore, the Title VI Coordinator, may determine that the Title VI process will not continue if the Report is determined to have been deliberately false and/or malicious.

Additionally, witnesses and Parties who knowingly provide false evidence; tamper with or destroy evidence after being directed to preserve such evidence; or deliberately mislead Title VI Office staff may be subject to discipline under the University of Illinois Code of Conduct or the University of Illinois Student Code.

Parties and witnesses will not be disciplined for making a false statement based solely on the University's determination of whether a hostile environment or Title VI Misconduct occurred. The fact that a decisionmaker (a) reached a conclusion that was contrary to the statement of a party or witness, and/or (b) found a statement of a party or witness to be lacking in credibility, is not

sufficient on its own to demonstrate that the party or witness in question gave a deliberately false statement or acted in bad faith.

8.5. Reasonable Accommodations for Individuals with Disabilities

The University is committed to providing reasonable accommodations to qualified individuals with a disability to ensure equitable access and participation in the Title VI Office's resolution processes. Individuals seeking reasonable accommodation should contact the Accessibility and Accommodations Division to facilitate the interactive process in consultation with the Title VI Coordinator. If a participant in these procedures is a registered DRES student, the Title VI Office will work to implement their DRES accommodations into these procedures where applicable.

8.6. Time limits

There is no time limitation on reporting an allegation to the Title VI Coordinator. However, if the Respondent is no longer subject to the University's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be limited.

8.7. Campus-Based University Administration Employees

University of Illinois System Office employees working on the University of Illinois Urbana-Champaign campus should communicate relevant concerns or initiate complaints and grievances regarding Title VI Misconduct with the System HR Office, whose policies and procedures apply.

If the Complainant is a U of I System Office employee and the Report of Title VI Misconduct is against an employee of the University, the System HR Office will report the incident to the Title VI Office, whose policies and procedures apply. The U of I System Office employee Complainant may also report directly to the Title VI Office if the Respondent is a University employee or student. The Title VI Coordinator will review reporting options with the Complainant and connect the U of I System Office employee to the System HR Office for resources and support services.

8.8. Resignation while Charges Pending

Should an employee Respondent resign, or a student Respondent withdraw, or should their employment or enrollment be ended for other reasons while unresolved allegations are pending, these procedures may continue at the Title VI Coordinator's discretion. Additionally, the University will continue to address and remedy any systemic issues that contributed to the alleged violation(s), and any ongoing effects of the alleged Title VI Misconduct.

8.9. Recordkeeping

The Title VI Office will maintain, for a period of at least seven (7) years, records of:⁵

- 1) Each Title VI Misconduct Report, the approximate date of receipt of the written or oral report; the relationship of the reporter to the alleged Affected Individual; the name(s) of the alleged Affected Individual and their relationship to the University, if applicable; the name(s) of the Respondent and Respondent's relationship to the University, if applicable; a brief description of the alleged incident; attempts to determine the identity(ies) of parties involved in reported incidents if not known by reporter; the status of the investigation of the report; steps taken as part of the response, documentation demonstrating each attempt to contact involved and affected parties, potential witnesses, and other affected individuals; the documentary evidence collected; documentation of supports offered; written determinations; the outcome of all completed investigations; outcome notices, including date; and the date of completion.
- 2) Any actions, including any remedial or supportive measures, taken in response to a Report or Complaint of Title VI Misconduct, including: any measures designed to restore or preserve equal access to the University's Program or Activity; any remedial measures offered or provided to the alleged Affected Individual and/or other individual(s) as applicable; the discipline imposed and the date the respondent(s) completed the disciplinary requirements, if applicable; the supportive resources offered; any additional steps taken to eliminate or prevent the recurrence of a hostile environment created by the alleged incident(s), if applicable; and if no supportive measures were provided to the Complainant, the reasons why such a response was not clearly unreasonable in light of the known circumstances.

8.10 Training

Annual Title VI training will be provided to University personnel responsible for, or involved in, responding to and/or investigating Reports or Complaints of Title VI Misconduct, including staff from Campus Belonging, Housing, OAE, OSCR, and the Title VI Office. Additionally, UIPD officers and other law enforcement personnel will receive detailed annual Title VI training.

8.11 Ensuring Accurate Information and Assessing Data

The Title VI Office will annually search University websites and publications, to ensure the accuracy of information on policies and procedures regarding discrimination, including harassment, or retaliation, or links to such policies, procedures, and forms, is correct. The Title VI Office will periodically assess available data at least annually, including reports received, whether investigated or substantiated, as well as findings of discrimination or harassment, or related retaliation, to see if any patterns, recidivism, or collective incidents exist that may

⁵ Other University offices, including but not limited to OSCR, OAE, UIPD, Illinois Human Resources, other Human Resources offices, and the Provost's Office, may also retain their own records regarding a matter that the Title VI Office has handled. This document does not address the retention of such records or how long they may be retained.

warrant additional inquiry or response campuswide or in specific programs or activities, including when the conduct occurs off campus or on social media, to eliminate a hostile environment in a University program or activity.

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