



MASSACHUSETTS COLLEGE *of* PHARMACY  
*and* HEALTH SCIENCES

# **MCPHS Sexual Harassment (Title IX)**

## **Resolution Process**

Revision Date: September 1, 2026

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## Table of Contents

|                                                                |    |
|----------------------------------------------------------------|----|
| I. Overview .....                                              | 3  |
| II. Title IX Contacts .....                                    | 3  |
| III. Jurisdiction .....                                        | 4  |
| IV. Formal Complaint .....                                     | 4  |
| V. Supportive Measures .....                                   | 5  |
| Emergency Removal and Administrative Leave .....               | 5  |
| VI. Initial Assessment and Dismissal .....                     | 6  |
| A. Mandatory Dismissal .....                                   | 6  |
| B. Discretionary Dismissal .....                               | 6  |
| VII. Informal Resolution .....                                 | 6  |
| VIII. Formal Resolution — Investigation .....                  | 7  |
| A. Notice of Investigation and Allegations .....               | 7  |
| B. Investigation .....                                         | 8  |
| C. Investigative Report .....                                  | 8  |
| IX. Live Hearing .....                                         | 9  |
| A. Hearing Decision-Maker .....                                | 9  |
| B. Hearing Notice .....                                        | 9  |
| C. Advisors and Cross-Examination .....                        | 9  |
| D. Refusal to Participate in Questioning .....                 | 10 |
| E. Hearing Record .....                                        | 10 |
| X. Determination Regarding Responsibility .....                | 10 |
| XI. Written Determination and Notice of Outcome .....          | 11 |
| XII. Sanctions and Remedies .....                              | 11 |
| XIII. Appeals .....                                            | 11 |
| XIV. Timelines Required by the 2020 Title IX Regulations ..... | 12 |
| XV. Retaliation .....                                          | 13 |
| XVI. Privacy .....                                             | 14 |
| XVII. Records .....                                            | 14 |
| XVIII. Accommodations .....                                    | 14 |
| XIX. Separation from Other University Processes .....          | 15 |

|                                                                            |    |
|----------------------------------------------------------------------------|----|
| XX. Revision of the Resolution Process .....                               | 15 |
| XXI. Title IX Obligations Regarding Pregnancy and Related Conditions ..... | 15 |
| A. Role of the Title IX Coordinator .....                                  | 16 |
| B. Role of the Office Supporting the Title IX Function.....                | 16 |
| C. Responsibilities of MCPHS and Responsible University Offices .....      | 17 |
| D. Students .....                                                          | 18 |
| E. Employees and Applicants for Employment .....                           | 18 |

**MCPHS UNIVERSITY**  
**Title IX Sexual Harassment Resolution Process**  
**2020 Title IX Regulations**

## **I. Overview**

MCPHS University (“MCPHS” or the “University”) is committed to providing an educational and employment environment free from ***Title IX Sexual Harassment***.

This Resolution Process applies exclusively to Formal Complaints of **Title IX Sexual Harassment within the jurisdiction of the 2020 Title IX regulations**, including qualifying allegations of sexual assault, dating violence, domestic violence, and stalking, as defined by the MCPHS Protection from Sexual Harassment (Title IX) Policy.

This Resolution Process is intended to provide a prompt, equitable, and fair process for resolving allegations of Title IX Sexual Harassment consistent with the procedural requirements of the ***2020 Title IX regulations***.

The Title IX Coordinator may refer a matter that does not meet the definition or jurisdictional requirements for this Resolution Process, as appropriate, to Human Resources or the Division of Student Affairs for review under another applicable MCPHS policy or process. Any such referral and subsequent review are separate from the MCPHS Sexual Harassment (Title IX) Resolution Process. Pregnancy-discrimination and retaliation matters are routed as described in Sections XV and XXI below.

## **II. Title IX Contacts**

### **Title IX Coordinator**

Rachel Andoscia  
Office of Community Engagement  
179 Longwood Ave., Boston, MA 02115  
617.732.1048  
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### **MCPHS Confidential Resource Provider**

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179 Longwood Ave., Boston, MA 02115  
617.732.2077  
dawn.ballou@mcphs.edu

### **Chief Community Engagement Officer**

Clara Ivonne Orlando, J.D.  
Office of Community Engagement  
10 Lincoln Square, Worcester, MA 01608  
617.751.3016  
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### III. Jurisdiction

This Resolution Process applies only when the alleged conduct, if proved:

1. Constitutes Sexual Harassment as defined by the 2020 Title IX regulations and the MCPHS Protection from Sexual Harassment (Title IX) Policy;
2. Occurred in the University's education or employment program or activity; and
3. Occurred against a person in the United States.

For purposes of this Resolution Process, "education program or activity" includes locations, events, or circumstances over which MCPHS exercised substantial control over both the Respondent and the context in which the alleged Sexual Harassment occurred, and includes any building owned or controlled by a student organization that is officially recognized by MCPHS.

### IV. Formal Complaint

A Formal Complaint initiates the formal Title IX grievance process.

A Formal Complaint may be filed by a Complainant who is participating in or attempting to participate in MCPHS's education program or activity. A Formal Complaint may also be signed by the Title IX Coordinator when doing so is not clearly unreasonable in light of the known circumstances. When the Title IX Coordinator signs a Formal Complaint, the Title IX Coordinator is not a Complainant or otherwise a party to the Resolution Process.

A Formal Complaint may be submitted to the Title IX Coordinator in person, by mail, by electronic mail, including at [TitleIX@mcphs.edu](mailto:TitleIX@mcphs.edu), using the MCPHS Sexual Harassment online reporting form designated by the University, or by any additional method MCPHS designates. [MCPHS Sexual Harassment formTitleIX@mcphs.edu](#)

Once a Formal Complaint is received and the allegations, on their face and if true, could constitute Title IX Sexual Harassment and could fall within the jurisdictional scope of the 2020 Title IX regulations, the Title IX Coordinator will provide the parties with information regarding the MCPHS Protection from Sexual Harassment (Title IX) Policy and the MCPHS Sexual Harassment Resolution Process, available supportive measures, the right to an Advisor, and the procedures that will apply. This threshold assessment does not determine whether the Policy was violated.

The University will presume that the Respondent is **not responsible** for the alleged conduct unless and until a determination regarding responsibility is made at the conclusion of the Resolution Process.

MCPHS may consolidate Formal Complaints as permitted by the 2020 Title IX regulations when allegations arise out of the same facts or circumstances, including

complaints against more than one Respondent, by more than one Complainant against one or more Respondents, or by one party against the other party.

## **V. Supportive Measures**

The Title IX Coordinator will offer and coordinate appropriate supportive measures to the Complainant and Respondent, as appropriate for concerns under the Title IX jurisdiction per the 2020 Title IX regulations.

Supportive measures are non-disciplinary, non-punitive individualized services designed to restore or preserve equal access to the University's education program or activity or employment without unreasonably burdening the other party.

Supportive measures may include, as appropriate:

- Counseling;
- Academic or work-related adjustments;
- Changes to schedules or locations;
- Mutual restrictions on contact;
- Changes in housing or work arrangements;
- Transportation assistance;
- Leave arrangements; and
- Other measures reasonably designed to preserve access to the University's education program or activity.

Supportive measures are available whether or not a Formal Complaint is filed. MCPHS will maintain as confidential any supportive measures provided to a Complainant or Respondent to the extent that maintaining confidentiality would not impair the University's ability to provide them. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures for Title IX Sexual Harassment matters.

### **Emergency Removal and Administrative Leave**

MCPHS may remove a Respondent from its education program or activity on an emergency basis only after conducting an individualized safety and risk analysis and determining that an immediate threat to the physical health or safety of a student or other individual arising from the allegations of Title IX Sexual Harassment justifies removal. MCPHS will provide the Respondent with notice and an opportunity to challenge the decision immediately following the removal. MCPHS determines whether emergency removal is warranted based on an individualized assessment; it is not determined by the Complainant's wishes.

MCPHS may place a non-student employee Respondent on administrative leave during the pendency of the Title IX grievance process, in its discretion and consistent with applicable law, contractual obligations, and University policy. Emergency removal and

administrative leave do not modify rights under Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, or other applicable law.

## **VI. Initial Assessment and Dismissal**

Upon receipt of a Formal Complaint, the Title IX Coordinator, in consultation with the Chief Community Engagement Officer, will conduct an initial assessment to determine whether the allegations as presented fall within the definition and jurisdictional scope of Title IX Sexual Harassment under the 2020 Title IX regulations.

### **A. Mandatory Dismissal**

MCPHS must dismiss the Formal Complaint, or an allegation within it, from this Resolution Process if the conduct alleged:

1. The alleged conduct would not constitute Title IX Sexual Harassment even if proved;
2. The alleged conduct did not occur in MCPHS's education program or activity;
3. The alleged conduct did not occur against a person in the United States.

### **B. Discretionary Dismissal**

The University may dismiss a Formal Complaint when:

1. The Complainant provides written notice of withdrawal of the Formal Complaint;
2. The Respondent is no longer enrolled or employed by MCPHS or is not a member of the MCPHS community; or
3. Specific circumstances prevent the University from gathering evidence sufficient to reach a determination regarding the Formal Complaint.

The parties will receive simultaneous written notice of any dismissal and the reasons for the dismissal. A dismissal may be appealed under the applicable appeal procedures.

## **VII. Informal Resolution**

After a Formal Complaint has been filed, the parties may request an Informal Resolution process when permitted by the 2020 Title IX regulations. MCPHS will not offer or facilitate Informal Resolution to resolve allegations that an employee sexually harassed a student.

Participation in Informal Resolution must be voluntary. The University will not require a Complainant or Respondent to participate in Informal Resolution as a condition of enrollment or employment.

Before an Informal Resolution process begins, MCPHS will provide the parties written notice of:

1. The allegations;
2. The requirements of the Informal Resolution process, including any circumstances under which the parties may be precluded from resuming a Formal Complaint arising from the same allegations;
3. The consequences resulting from participation in Informal Resolution, including records that may be maintained or shared;
4. The right to withdraw from Informal Resolution and resume the formal grievance process before agreeing to a resolution; and
5. The requirement that both parties provide voluntary, written consent to participate.

The Title IX Coordinator, in consultation with the Chief Community Engagement Officer, must determine that Informal Resolution is appropriate before the process begins.

## **VIII. Formal Resolution — Investigation**

When a Formal Complaint proceeds through the MCPHS Sexual Harassment Resolution Process, the University will conduct a prompt, thorough, impartial, and equitable investigation.

### **A. Notice of Investigation and Allegations**

The Title IX Coordinator will provide the parties with written notice of the allegations and sufficient time to prepare a response before any initial interview.

The notice will include, as applicable:

- The identities of the parties;
- The allegations potentially constituting Title IX Sexual Harassment;
- The date and location of the alleged conduct, if known;
- The specific policy provisions implicated;
- The applicable procedures;
- The potential sanctions or remedies;
- The presumption that the Respondent is not responsible;
- The parties' right to an Advisor of choice, who may be an attorney;
- The parties' right to inspect and review evidence;
- The University's prohibition against retaliation;
- The University's prohibition against knowingly submitting false information; and
- Information regarding disability accommodations.

The notice may be amended as the investigation identifies additional allegations or information. If MCPHS decides to investigate allegations not included in the original notice, it will provide the parties with written notice of the additional allegations.

## B. Investigation

MCPHS, not the parties, bears the burden of proof and the burden of gathering evidence sufficient to determine responsibility.

The Investigator will:

1. Interview the parties and relevant witnesses;
2. Gather relevant evidence;
3. Provide the parties equal opportunity to present evidence and identify witnesses;
4. Provide the parties equal opportunity to suggest relevant questions;
5. Conduct follow-up interviews when appropriate; and
6. Maintain an impartial investigation.

MCPHS will not restrict either party's ability to discuss the allegations under investigation or to gather and present relevant evidence. Each party may have an Advisor of choice present at meetings or proceedings, subject to equally applied restrictions regarding the Advisor's participation.

For any investigative interview or other meeting, the University will provide written notice of the date, time, location, participants, and purpose, with sufficient time for the party to prepare.

The investigation will consider both inculpatory and exculpatory evidence. The Investigator will not determine responsibility.

MCPHS will not access, consider, disclose, or otherwise use a party's records made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in that capacity in connection with treatment unless the University obtains that party's voluntary, written consent for use in this Resolution Process.

## C. Investigative Report

Before the live hearing, the Investigator will prepare a written investigative report that fairly summarizes the relevant evidence.

Before completing the investigative report, the University will provide each party and the party's Advisor, if the party has consented, with the evidence subject to inspection and review.

Each party will have at least 10 calendar days to submit a written response, which the Investigator will consider before completing the investigative report.

The University will provide each party and the party's Advisor, if any, the investigative report at least 10 calendar days before the live hearing for review and written response.

The parties will also have access to the relevant evidence during the live hearing.

## **IX. Live Hearing**

A live hearing will be conducted after the investigation is complete. MCPHS conducts Title IX live hearings remotely. The parties, witnesses, Advisors, Hearing Decision-Maker, and other authorized participants will participate virtually using technology that enables the Hearing Decision-Maker and parties to simultaneously see and hear the party or witness answering questions. A remotely conducted hearing constitutes a live hearing for purposes of the 2020 Title IX regulations.

### **A. Hearing Decision-Maker**

The Hearing Decision-Maker will be impartial and free from actual or apparent conflicts of interest or bias.

Any concern regarding bias or conflict of interest must be addressed through the procedures established by the University.

### **B. Hearing Notice**

The parties will receive written notice of the remote hearing, including the date, time, virtual-access information, participants, and applicable procedures, with sufficient time to prepare. MCPHS will provide reasonable instructions and take reasonable steps to address technology or accessibility issues that could interfere with meaningful participation.

### **C. Advisors and Cross-Examination**

Each party must have an Advisor for the purpose of conducting cross-examination at the live hearing.

At the live hearing, the Hearing Decision-Maker may ask relevant questions of the parties and witnesses. Each party's Advisor may ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Cross-examination will be conducted directly, orally, and in real time by the party's Advisor and never by a party personally. If a party does not have an Advisor present at the live hearing, MCPHS will provide, without fee or charge to that party, an Advisor of the University's choice to conduct cross-examination on behalf of that party.

The Hearing Decision-Maker will determine whether each proposed question is relevant before the party or witness answers the question and will explain any decision to exclude a question as not relevant. Questions that are irrelevant, including duplicative questions that do not seek additional relevant information, may be excluded under the applicable Title IX standards.

Questions and evidence about the **Complainant's sexual predisposition or prior sexual behavior are not relevant and are prohibited**, unless one of the following exceptions applies:

1. The questions or evidence are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant; or
2. The questions or evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Questions or evidence concerning a party's medical, psychological, or similar treatment records will not be accessed, considered, disclosed, or otherwise used unless the University obtains that party's voluntary, written consent to do so for the Sexual Harassment Resolution Process, as permitted by the 2020 Title IX regulations.

#### D. Refusal to Participate in Questioning

A party or witness may choose not to participate in the hearing or may decline to answer questions.

The Hearing Decision-Maker will not draw an inference regarding responsibility solely from a party's or witness's absence from the hearing or refusal to answer questions. The determination will be based on the relevant evidence available through the investigation and hearing.

#### E. Hearing Record

MCPHS will create an audio or audiovisual recording, or transcript, of the remote live hearing and make it available to the parties for inspection and review as required by the 2020 Title IX regulations.

The deliberations of the Hearing Decision-Maker will not be recorded or transcribed.

### X. Determination Regarding Responsibility

The Hearing Decision-Maker will objectively evaluate the relevant evidence and determine whether the Respondent is responsible for each alleged policy violation.

MCPHS will use the **preponderance of the evidence** standard of proof consistently for determinations regarding responsibility.

Preponderance of the evidence means that, based on the relevant evidence, it is more likely than not that the alleged conduct occurred. In applying this standard, the Hearing Decision-Maker determines whether the evidence supporting a finding of responsibility is more persuasive than the evidence against such a finding.

The Hearing Decision-Maker will consider relevant inculpatory and exculpatory evidence and will not base the determination on impermissible credibility assumptions or prohibited inferences.

## **XI. Written Determination and Notice of Outcome**

The Decision-Maker will prepare a written determination that includes:

1. Identification of the allegations potentially constituting Title IX Sexual Harassment;
2. A description of the procedural steps taken;
3. Findings of fact;
4. Conclusions regarding the application of the applicable policy to the facts;
5. A determination regarding responsibility for each allegation;
6. The rationale for each determination;
7. Any sanctions imposed; and
8. Any remedies designed to restore or preserve equal access to the University's education program or activity; and
9. The procedures and permissible bases for appeal.

The University will provide the written determination to the parties simultaneously. The determination becomes final when the parties receive the written appeal determination, if an appeal is filed, or when the time to file an appeal expires without an appeal.

## **XII. Sanctions and Remedies**

When a Respondent is found responsible, the University may impose appropriate sanctions consistent with the applicable University policy.

Remedies will be designed to restore or preserve the Complainant's equal access to the University's education program or activity. Remedies may include the same individualized services described as supportive measures; following a finding of responsibility, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent. The Title IX Coordinator is responsible for implementing remedies effectively.

Sanctions and remedies will be implemented in accordance with the final determination and any applicable appeal procedures.

## **XIII. Appeals**

Either party may appeal a determination regarding responsibility or a dismissal of a Formal Complaint.

Appeals will be reviewed by an impartial Appeal Decision-Maker who was not involved in the underlying matter.

Appeals may be based on:

1. A procedural irregularity that affected the outcome;
2. New evidence that was not reasonably available when the determination or dismissal was made and that could affect the outcome; or
3. A conflict of interest or bias by the Title IX Coordinator, Investigator, or Hearing Decision-Maker that affected the outcome.

An appeal request must be submitted in writing, must be between 5 and 10 pages in length, and must be filed within three (3) business days after the University provides the written determination regarding responsibility or written notice of dismissal, as applicable.

When an appeal is filed, MCPHS will notify the other party in writing and will implement appeal procedures equally for both parties. Both parties will have a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome. The Appeal Decision-Maker will issue a written decision describing the appeal outcome and the rationale, and MCPHS will provide the appeal determination to both parties simultaneously.

#### **XIV. Timelines Required by the 2020 Title IX Regulations**

The University aspires to complete the Formal Resolution Process within 120 business days from the filing of a Formal Complaint through issuance of the written determination regarding responsibility. This aspirational target promotes reasonably prompt resolution and is not a mandatory deadline or guarantee that the process will be completed within 120 business days. The time reasonably required to complete a matter may vary based on the nature, complexity, and circumstances of the case. This aspirational timeframe includes the investigation, the parties' evidence reviews and response period, preparation and review of the investigative report, scheduling and conducting the live hearing, and issuance of the written determination. The 120-business-day aspirational timeframe does not include an appeal.

MCPHS also aspires to complete an appeal within 30 business days after the deadline for the parties' appeal submissions and written responses. The University aspires to complete an Informal Resolution process, when offered and accepted by the parties, within 45 business days after all parties provide the written consent required to begin the Informal Resolution process.

These timeframes are aspirational targets and are not mandatory deadlines or guarantees of completion within the stated periods.

The University may temporarily delay the grievance process or extend a specific procedural timeframe when permitted for good cause. Good cause may include circumstances such as the absence or unavailability of a party, Advisor, or witness;

concurrent law-enforcement activity; the need for language assistance or disability accommodations; or other case-specific circumstances affecting the fairness or accuracy of the process. When applicable under the 2020 Title IX regulations, the University will provide the Complainant and Respondent written notice of the delay or extension and the reasons for the action. Any such delay or extension will be temporary and limited to the period reasonably necessary to address the circumstances giving rise to it.

These aspirational timeframes reflect the University's operating structure and available Title IX personnel while supporting reasonably prompt resolution. Failure to meet an aspirational timeframe **does not constitute a procedural violation, invalidate the process or its outcome, or create a separate right of appeal or other remedy.**

The University will nevertheless proceed without unreasonable delay and will comply with any specific minimum time periods required by the applicable Title IX regulations. For any particular Formal Complaint, the Appeal Decision-Maker **will not** be the same person who served as the Hearing Decision-Maker, Investigator, or Title IX Coordinator in that matter. The University may designate or arrange for another appropriately trained and impartial individual to serve as Appeal Decision-Maker when an appeal is filed.

## **XV. Retaliation**

Neither MCPHS nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations, or because the individual made a report or complaint, testified, assisted, participated, or refused to participate in any manner in an investigation, proceeding, or hearing under Title IX.

MCPHS will review and address reports or complaints alleging retaliation prohibited by Title IX under the applicable MCPHS policy or procedure. Depending on the nature of the alleged conduct and the status of the individual alleged to have engaged in retaliation, the matter may be investigated and resolved under the MCPHS Protection from Discrimination and Harassment Policy or, when applicable to student conduct, the MCPHS Student Code of Conduct.

The Title IX Coordinator will coordinate the University's response and, as appropriate, refer the matter to Human Resources, the Division of Student Affairs, or another responsible University office.

The Title IX Coordinator's coordination role does not require the Title IX Coordinator to personally investigate or adjudicate a retaliation complaint. A retaliation complaint is not required to be resolved through this Sexual Harassment Resolution Process solely because it relates to a Title IX Sexual Harassment matter; MCPHS may use this Resolution Process when the University determines that doing so is appropriate and consistent with applicable Title IX requirements.

Exercising rights protected under the First Amendment does not constitute retaliation prohibited by Title IX. Charging an individual with a code-of-conduct violation for making a materially false statement in bad faith in the course of a Title IX resolution process does not constitute retaliation, provided that a determination regarding responsibility, standing alone, is not sufficient to conclude that a party made a materially false statement in bad faith.

## **XVI. Privacy**

MCPHS will keep private the identity of any individual who has made a report or complaint of sex discrimination, any Complainant, any individual reported to be the perpetrator of sex discrimination, any Respondent, and any witness, except as permitted by FERPA, required by law, or as necessary to carry out Title IX, including the conduct of an investigation, hearing, or judicial proceeding arising under Title IX.

Information may be shared as necessary to conduct the Resolution Process, implement supportive measures and remedies, comply with applicable legal requirements, or otherwise carry out the University's Title IX responsibilities.

## **XVII. Records**

MCPHS will maintain for seven years the records required by 34 C.F.R. § 106.45(b)(10), including records of each Title IX Sexual Harassment investigation, determinations, hearing recordings or transcripts, sanctions, remedies, appeals, informal resolutions, and actions taken in response to reports or Formal Complaints, including supportive measures and the basis for the University's response.

MCPHS will also maintain for seven years materials used to train Title IX Coordinators, Investigators, Decision-Makers, Appeal Decision-Makers, and persons who facilitate Informal Resolution. Training will address the definition of Title IX Sexual Harassment, the scope of MCPHS's education program or activity, how to conduct the applicable process, and how to serve impartially, including by avoiding prejudgment, conflicts of interest, and bias. Decision-Makers and Investigators will receive the additional training on relevance and investigative reports required by the 2020 regulations. Training materials will not rely on sex stereotypes and will promote impartial investigations and adjudications. MCPHS will make training materials publicly available on its website as required by the 2020 regulations.

## **XVIII. Accommodations**

MCPHS will provide reasonable accommodations to parties and participants when necessary to ensure meaningful access to the MCPHS Sexual Harassment Resolution Process.

Direct requests for accommodations to the Title IX Coordinator, who will coordinate with the appropriate University office. Accommodations ensure meaningful access to the

Resolution Process and do not expand the substantive definition or jurisdiction of Title IX Sexual Harassment.

## **XIX. Separation from Other University Processes**

This Resolution Process applies **only to matters governed by the 2020 Title IX regulations**.

Allegations that do not meet the definitions or jurisdictional requirements of the 2020 Title IX regulations will not be resolved under this process.

Where a Formal Complaint or allegation is dismissed from the MCPHS Sexual Harassment (Title IX) Resolution Process, the University may address the conduct under another applicable University process, provided that the separate process is not represented as part of the MCPHS Sexual Harassment (Title IX) Resolution Process.

## **XX. Revision of the Resolution Process**

MCPHS may revise this Resolution Process as necessary to maintain compliance with applicable Title IX requirements and University policy.

MCPHS will communicate any revision in accordance with applicable procedures.

## **XXI. Title IX Obligations Regarding Pregnancy and Related Conditions**

Separate from the Sexual Harassment Resolution Process above, Title IX and its longstanding implementing regulations prohibit discrimination based on pregnancy and related conditions, including pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom.

This Resolution Process does not investigate complaints alleging pregnancy discrimination that do not independently constitute Title IX sexual harassment.

Human Resources is designated to investigate such complaints involving employees or applicants under the MCPHS Protection from Discrimination and Harassment Policy; the Division of Student Affairs is designated to investigate such complaints involving students under the applicable MCPHS Protection from Discrimination and Harassment Policy and/or Student Code and Community Standards System. The Title IX Coordinator retains responsibility for coordinating MCPHS's Title IX compliance and will coordinate with those offices as appropriate.

When a complaint contains both pregnancy-discrimination allegations and allegations that may constitute Title IX Sexual Harassment, the Title IX Coordinator, in consultation with the Chief Community Engagement Officer, will determine the appropriate process or processes for the allegations and coordinate with Human Resources or the Division of Student Affairs. Pregnancy-discrimination allegations that do not independently

constitute Title IX Sexual Harassment will not be resolved under this Resolution Process solely because they arise from the same facts or circumstances as an allegation of Title IX Sexual Harassment.

## A. Role of the Title IX Coordinator

The Title IX Coordinator coordinates the University's efforts to comply with Title IX and its implementing regulations, including the University's responsibilities concerning pregnancy and related conditions. The Title IX Coordinator serves as a central point of contact for Title IX questions, concerns, and complaints involving pregnancy and related conditions.

1. Provide information regarding applicable Title IX protections, the University's nondiscrimination requirements, and applicable University procedures.
2. Receive and coordinate the University's response to reports or complaints alleging discrimination based on pregnancy or related conditions.
3. Coordinate Title IX compliance for complaints alleging pregnancy discrimination and ensure that such complaints are referred to and addressed through the applicable University resolution process;
4. Identify and coordinate with the University office or individual responsible for implementing an applicable academic, employment, leave, benefit, service, or other action required by Title IX.
5. Coordinate, as appropriate, with Academic Affairs, Student Affairs, Human Resources, faculty, supervisors, and other responsible University offices to support consistent compliance with Title IX.
6. Provide or coordinate information, education, and guidance concerning Title IX protections related to pregnancy and related conditions.
7. Maintain or coordinate appropriate documentation of Title IX reports, complaints, referrals, and University responses consistent with applicable law and University record-retention requirements.
8. Monitor the University's Title IX response and identify compliance concerns or systemic issues requiring institutional attention.

The Title IX Coordinator coordinates Title IX compliance but **does not replace** the responsibilities of the MCPHS offices or individuals responsible for implementing specific academic, employment, leave, benefit, accessibility, or other actions.

## B. Role of the Office Supporting the Title IX Function

The responsible MCPHS office supporting the Title IX function assists the Title IX Coordinator in administering and coordinating the University's Title IX responsibilities concerning pregnancy and related conditions.

1. Provide information and resources concerning Title IX protections related to pregnancy and related conditions.

2. Receive concerns and inquiries and route them to the Title IX Coordinator and, when appropriate, to the University office responsible for the requested or required action.
3. Support communication and coordination among the Title IX Coordinator and responsible University offices.
4. Support the administration of the applicable MCPHS offices and procedures for complaints alleging pregnancy discrimination.
5. Support education, awareness, training, and resource development concerning pregnancy discrimination and related Title IX responsibilities.
6. Maintain appropriate Title IX records and documentation consistent with applicable requirements.
7. Support tracking and institutional review of pregnancy-related Title IX concerns to help identify recurring barriers, compliance concerns, or opportunities for improvement.

The office supporting the Title IX function does not replace Human Resources, Academic Affairs, Student Affairs, Accessibility or Disability Services, faculty, supervisors, or other University offices responsible for implementing particular academic, employment, leave, benefit, service, accessibility, or other actions.

### C. Responsibilities of MCPHS and Responsible University Offices

MCPHS retains responsibility for compliance with Title IX. The Title IX Coordinator coordinates the University's compliance efforts. Human Resources is designated to investigate pregnancy-discrimination complaints involving employees or applicants, and the Division of Student Affairs is designated to investigate pregnancy-discrimination complaints involving students, when those allegations do not independently constitute Title IX Sexual Harassment. Other appropriate University offices or individuals implement academic, employment, leave, benefit, service, accessibility, or other actions within their respective areas of responsibility.

1. Ensure that students, employees, and applicants are not subjected to prohibited discrimination based on pregnancy or related conditions.
2. Make information about the Title IX Coordinator and the University's Title IX resolution process available as required.
3. Refer pregnancy-related Title IX concerns to the Title IX Coordinator so that the University's response can be coordinated.
4. Implement applicable academic, employment, leave, benefit, service, or other measures required under Title IX through the responsible University office.
5. Address pregnancy-discrimination complaints through the applicable MCPHS Protection from Discrimination and Harassment Policy and/or Student Code and Community Standards System, as appropriate, while the Title IX Coordinator coordinates the University's Title IX compliance responsibilities.
6. Ensure that faculty, supervisors, administrators, and other employees whose responsibilities involve pregnancy-related requests understand the University's applicable Title IX obligations.
7. Document and communicate responsibilities sufficiently to support consistent implementation across MCPHS programs and offices.

## D. Students

1. The University will not discriminate against or exclude a student from its education program or activity, including any class or extracurricular activity, on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom.
2. The University may require a pregnant student to obtain certification from a physician that the student is physically and emotionally able to continue participation in the regular education program or activity only when such certification is required of all students for other physical or emotional conditions requiring the attention of a physician.
3. Any separate portion of an education program or activity for pregnant students will be voluntary and comparable to that offered to students who are not pregnant.
4. The University will treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom in the same manner and under the same policies as any other temporary disability with respect to any medical or hospital benefit, service, plan, or policy for students.
5. If the University does not maintain a leave policy for students, or a student does not otherwise qualify for leave under an applicable policy, the University will treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom as justification for a leave of absence for as long as the student's physician deems medically necessary. At the conclusion of the leave, the student will be reinstated to the status held when the leave began.

## E. Employees and Applicants for Employment

1. The University will not discriminate against or exclude from employment any employee or applicant for employment on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom.
2. The University will treat pregnancy, childbirth, false pregnancy, termination of pregnancy, recovery therefrom, and any temporary disability resulting from those conditions as any other temporary disability for all job-related purposes, including commencement, duration, and extensions of leave; payment of disability income; accrual of seniority and other benefits or services; reinstatement; and employment-based medical, hospital, and other benefits.
3. If the University does not maintain a leave policy for employees, or an employee has insufficient leave or accrued employment time to qualify under an applicable policy, the University will treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom as justification for a leave of absence without pay for a reasonable period of time. At the conclusion of the leave, the employee will be reinstated to the status held when the leave began or to a comparable position without decrease in compensation, loss of promotional opportunities, or loss of other employment rights or privileges.