

**Princeton University's Procedures for Filing a Title IX Grievance with the
University Title IX Coordinator**

As of July 1, 2013

Title IX and its implementing federal regulations prohibit discrimination on the basis of sex in its programs and activities. The University is committed to maintaining an educational, working, and living environment free from discrimination and harassment, including maintaining an environment in which no student, faculty or staff member is excluded from participation in or denied the benefits of its programs and activities as a result of gender.

When a student, faculty or staff member, or other participant in the University's programs and activities feels that s/he has been subjected to discrimination on the basis of sex, s/he may use these Title IX grievance procedures to bring concerns to the attention of the University Title IX Coordinator for the purpose of obtaining a prompt and equitable resolution.¹

¹ These grievance procedures, which specifically address the University's Title IX compliance obligations, are intended to be read and implemented in the context of the University's broader Nondiscrimination/Anti-harassment Policy and Grievance Procedures, which generally advises the University community of prohibited discriminatory and harassing conduct, as well as the resources and processes for addressing and resolving complaints of discrimination, harassment and/or violation of University policy. See www.princeton.edu/diversity/policy/antiharassment.

These Title IX grievance procedures are separate from the University's student disciplinary processes, by which the University may bring a discipline charge against a student for violating University policy. In that regard, *Rights, Rules, Responsibilities* generally notes

The primary purposes of regulations and discipline in a university are to protect the well-being of the community and to advance its educational mission by defining and establishing certain norms of behavior. At Princeton, disciplinary proceedings have a role that is subordinate to positive guidance, rational admonition, and reasonable appeal to members of the University to observe its stated norms. The disciplinary system establishes procedures for a fair hearing, including advising a person fully of the charges against him or her, affording him or her ample opportunity to speak on his or her behalf, and requiring a clear explanation of his or her rights of appeal. Disciplinary proceedings are instituted only for violations of standards of conduct defined in advance and published, or for actions that can be reasonably deduced as violations in light of those specifically defined as such.

(<http://www.princeton.edu/pub/rrr/part1>) Accordingly, the responsibility for resolving student disciplinary matters and imposing penalties against students for violating University policy remains vested in the student disciplinary processes of the Office of the Dean of Undergraduate Students or the Office of the Dean of the Graduate School, as appropriate.

1. The University Title IX Coordinator

The Vice Provost for Institutional Equity and Diversity in the Office of the Provost is responsible for coordinating the University's compliance with Title IX of the Education Amendments of 1972, and serves as the University Title IX Coordinator.

The University Title IX Coordinator designates Assistant Title IX Coordinators, who are trained to conduct Princeton's Title IX activities. Assistant Title IX Coordinators include:

- Associate Deans in the Office of the Dean of Undergraduate Students
- Associate Dean of the Graduate School
- Directors of Student Life
- Director of Equal Opportunity Programs.

Many other individuals on campus are trained in the general principles of Title IX and can provide referrals to the University Title IX Coordinator or Assistant Title IX Coordinators. These include staff members in Athletics, Public Safety, the LGBT Center, the Women's Center, the Office of the Dean of the Faculty, and Human Resources.

2. General Principles

For the purpose of these grievance procedures, "University Title IX Coordinator" shall mean the University Title IX Coordinator and/or designated Assistant Title IX Coordinators, unless otherwise specified. Where appropriate and with prior notice where applicable, these grievance procedures may be modified or amended by the University Title IX Coordinator.

Privacy and confidentiality: All activities under these grievance procedures shall be conducted with due regard for any legitimate privacy and reputational interests of those involved. It is expected that any materials and information prepared or acquired under these grievance procedures will be shared only with those who have a legitimate need to know. Disclosure of such information may also be made if it is permitted by law and the University Title IX Coordinator determines in his or her judgment: (1) that such disclosure is necessary to protect the health, safety, or well-being of members of the Princeton community; or (2) that such disclosure advances the interests of those involved in the process and/or the University and outweighs the interest in confidentiality. While the University Title IX Coordinator will take into account any requests made by a complainant for confidentiality or that a Title IX grievance not be investigated, the University Title IX Coordinator must take appropriate steps to respond to the grievance consistent with the requirements of Title IX.

Retaliation: Retaliation against any person in the University community either for alleging discrimination prohibited by Title IX or for cooperating in these grievance procedures is strictly prohibited.

Standard of Evidence: The University Title IX Coordinator shall review allegations of discrimination prohibited by Title IX by applying a preponderance of the evidence standard.

Right of Appeal and Review of Disciplinary Proceedings: The University Title IX Coordinator does not make a determination on or review a disciplinary process's factual findings, conclusions, or imposed penalty. Any appeal rights in that regard which may exist are referenced in applicable student, faculty and staff policies and procedures. If a complainant wishes to appeal the decisions of an Assistant Title IX Coordinator regarding remedial measures, s/he may make a written appeal to the University Title IX Coordinator according to the grievance procedures specified below.

3. Procedures

Any Community Member who believes that he/she has been subjected to discrimination prohibited by Title IX, or that the University has failed to meet its Title IX obligations, may bring the concern to the attention of the University Title IX Coordinator. While the University Title IX Coordinator welcomes an informal presentation of such allegations, and is available to address concerns through counseling, advice, and informal resolution, the University Title IX Coordinator is fully prepared to receive and address such allegations through formal grievance procedures.

The University Title IX Coordinator has the authority to investigate allegations of discrimination prohibited by Title IX even absent the filing of a formal grievance, or its subsequent withdrawal. In addition, the University Title IX Coordinator may proceed with investigating a formal or informal grievance even if a complainant specifically requests that the matter not be pursued. In such a circumstance, the University Title IX Coordinator will take all reasonable steps to investigate and respond to the matter in a manner which is informed by the complainant's articulated concerns.

In most circumstances, the University Title IX Coordinator will coordinate his/her activities with other University offices charged with responsibilities for student, faculty and staff conduct and discipline and for enforcing the University's policies and procedures generally.

Informal Resolution

In many instances, counseling, advice, or informal discussion may be useful in resolving concerns about allegations of discrimination prohibited by Title IX. Complainants who wish to resolve their concerns informally should bring them to the attention of the University Title IX Coordinator.

In working to resolve the matter, the University Title IX Coordinator ordinarily will interview the complainant and, as appropriate, others who may have knowledge of the facts underlying the grievance. At any point, including while the informal process is ongoing or afterward, the complainant may elect to end the informal process in favor of filing a formal grievance.

Although Princeton welcomes informal resolution of grievances when appropriate, it will not use mediation between a complainant and alleged perpetrator or any other informal resolution mechanism to resolve grievances pertaining to non-consensual sexual contact or non-consensual sexual penetration, as defined by the University Policy on Sexual Misconduct.

Grievance Procedures for Formal (i.e. Written) Grievances

Complainants who are considering bringing a formal grievance may at any time meet with the University Title IX Coordinator, who will discuss the matter and describe the formal grievance process. Alternatively, a complainant may choose to submit a written grievance to the University Title IX Coordinator (including via use of the available [Title IX grievance form](#)).

- a. A formal grievance process is initiated when a complainant submits a written statement alleging discrimination prohibited by Title IX to the University Title IX Coordinator. In the statement, the complainant is encouraged to request any relief sought from the University. Prompt submission of formal grievances is encouraged.
- b. The University Title IX Coordinator will consider the written grievance, and may dismiss the grievance without further process or review if the University Title IX Coordinator determines that the grievance on its face is frivolous, not credible, clearly without merit, or outside the scope of these grievance procedures.
- c. If the grievance is not dismissed, the University Title IX Coordinator will interview the individual who submitted the written statement. Depending on the circumstances, the University Title IX Coordinator also may interview others with relevant knowledge, review documentary materials, and take any other appropriate action to gather and consider information relevant to the grievance.
- d. The University Title IX Coordinator will determine whether the complainant was excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of sex under any University program or activity, using a preponderance of the evidence standard. The University Title IX Coordinator will consult with other University offices as necessary in reaching a decision regarding the written grievance. The University Title IX

Coordinator will prepare a written report setting forth findings, conclusions, and actions to be taken, if any, and will determine with whom to share the report.

- e. Following such review, the University's Title IX Coordinator will, as necessary, take appropriate action to ensure that the University comes into compliance with Title IX in a manner which is prompt and equitable to the complainant. For example, the University Title IX Coordinator may assure that appropriate changes to housing, academic programs or working conditions are implemented. While the action taken by the Title IX Coordinator may impact third parties, such action is not intended to be punitive (or constitute disciplinary penalty) with respect to these third parties.
- f. The decision of the University Title IX Coordinator is the final resolution of the grievance. (If a complainant wishes to appeal the decisions of an Assistant Title IX Coordinator regarding remedial measures, s/he may make a written appeal to the University Title IX Coordinator according to the grievance procedures.)
- g. While the time it may take to investigate and resolve a Title IX grievance will depend on a variety of factors, including the nature and scope of the allegations, the University Title IX Coordinator will seek to resolve the grievance within 45 working days of receipt of the grievance. Throughout the process, the University Title IX Coordinator will, as appropriate, keep the participants informed of the status of the grievance process.

4. Allegations of Student-on-Student Sexual Harassment and/or Discrimination

Regardless of whether student disciplinary proceedings or a criminal charge are pending or being investigated pertaining to an allegation of student sexual misconduct, and irrespective of their outcome, Princeton shall take steps to meet its responsibility to provide an environment where no member of its community is, on the basis of sex, excluded from participation in, denied the benefits of, or subjected to discrimination under any education program or activity. In addition to the procedures described above, the following additional procedures apply in allegations of student-on-student sexual harassment and/or discrimination.

- a. The University Title IX Coordinator shall be available as a resource to any dean or other Princeton faculty or staff member who receives an allegation of student-on-student sexual harassment and/or discrimination, and the University Title IX Coordinator shall be promptly informed of any such allegation.
- b. As indicated above, following appropriate investigation and review, the University Title IX Coordinator or Assistant Title IX Coordinator shall

determine and promptly implement any remedies that s/he believes are necessary to maintain an environment free from harassment and/or discrimination and to protect the safety and well-being of community members. Such remedies may include, but are not limited to, no-contact orders, academic accommodations, housing accommodations, counseling services, campus escorts, and educational or outreach initiatives. Adjustments to a student(s)' educational environment may be taken on an interim or permanent basis. Any adjustments in that regard would not be punitive, and, as such, would not appear on any student disciplinary record.

- c. At any point during an informal or formal Title IX grievance procedure, the University Title IX Coordinator may, at his/her discretion, inform other University officials of the possibility that a violation of the University's Code of Conduct and/or disciplinary policies may have taken place.
- d. These procedures do not replace the University's student disciplinary processes, including the appeal processes specified therein. While the University Title IX Coordinator will review grievance claims as to whether the University has fulfilled its obligations under Title IX, including whether student disciplinary processes were conducted in a manner free of discrimination, it is not the function of the University Title IX Coordinator to hear appeals from, rehear or otherwise resolve student discipline matters based on their content.

5. Contacts

The University Title IX Coordinator can be reached at the following address and telephone number:

Vice Provost for Institutional Equity and Diversity
205 Nassau Hall
Princeton, New Jersey 08544
609-258-6110