



UNIVERSITY OF RICHMOND

Policy Manual

Policy #:	GOV-3101	Policy Title:	Policy Prohibiting Discrimination
Effective:	August 22, 2024	Responsible Office:	Compliance, Title IX and Non-Discrimination
Date Approved:	August 22, 2024	Approval:	Vice President and General Counsel
Replaces Policy Dated:	August 14, 2020	Responsible University Official:	Director of Compliance & Title IX Coordinator

PURPOSE:

This policy is designed to foster adherence to the University of Richmond’s commitment to non-discrimination and to ensure compliance with applicable laws. This policy serves as the University’s notice of non-discrimination for purposes of compliance with Title VI and Title IX (defined below) and fulfills the University’s obligations under IRS Revenue Procedure 75-50 (as amended by Revenue Procedure 2019-22).

This policy and related University policies and procedures are not contracts and do not confer contractual rights upon any individual. The University has the right to amend or modify this policy and related University policies and procedures from time to time, without prior notice.

SCOPE:

This policy applies to the University of Richmond and all of its Affiliates. As used in this policy, the term “Affiliates” means organizations or entities in which the University owns a controlling interest or has the right to elect the majority of the entity’s governing board. This policy applies to University students, staff, and faculty and to other individuals participating in or attempting to participate in the University’s education programs or activities.

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POLICY STATEMENT:

GOV 3101.1 – Policy

The University of Richmond prohibits discrimination and harassment against applicants, students, faculty or staff on the basis of race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity, gender expression, disability, status as a veteran or any classification protected by local, state or federal law.¹

This prohibition includes discrimination and harassment on the basis of color, ethnicity, gender, or military status. As used in this policy and related University policies, the prohibition on discrimination based on national or ethnic origin extends to discrimination, including harassment, based on an individual’s actual or perceived: (i) shared ancestry or ethnic characteristics, such as students of Jewish, Muslim, Palestinian, and/or South Asian descent; or (ii) citizenship or residency in a country with a dominant religion or distinct religious identity.

This policy applies to discrimination and harassment alleged to occur in any education program or activity of the University, which means all of the operations of the University. This prohibition includes discrimination in violation of this policy in the admission² or retention of students. This policy also requires the University to foster and maintain equality of opportunity for students, faculty, and staff without discrimination or segregation on a basis prohibited by this policy.

The University is committed to preventing and responding to conduct that violates its non-discrimination policy. Any individual whose conduct violates this policy will be subject to disciplinary action in accordance with applicable University policies and procedures.

GOV 3101.2 – Compliance with Applicable Law

The University complies with all applicable state and federal laws that prohibit discrimination and harassment, including those described below.

A. Title IX of the Education Amendments of 1972 (Title IX)

The University does not discriminate on the basis of sex and prohibits such discrimination in any education program or activity operated by the University in accordance with Title IX and its implementing regulations. This prohibition includes discrimination on the basis of sex in admission to University graduate programs and employment. For purposes of this policy, this prohibition on discrimination includes, but is not limited to discrimination on the basis of marital status, pregnancy, and childbirth or related conditions (including lactation).

¹ The statement set forth in this paragraph may not be altered or amended without the approval of the University of Richmond Board of Trustees.

² Undergraduate admission policies and practices that are permissible under Title IX are not precluded by this policy.

B. Title VI of the Civil Rights Act of 1964 (Title VI)

The University does not discriminate on the basis of race, color or national origin and prohibits such discrimination in any education program or activity operated by the University. Prohibited discrimination includes denying the benefits or excluding from participation in any education program or activity operated by the University on the basis of race, color, or national origin. The scope of the University's obligations under Title VI extends to prohibiting discrimination, including harassment, based on a student'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 prohibition includes discrimination on the basis of race, color or national origin in admission to University programs.

C. Other Applicable Laws

The University of Richmond also complies with other applicable state and federal laws prohibiting discrimination, including, but not limited to the Age Discrimination in Employment Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, Title VII of the Civil Rights Act of 1964, the Equal Pay Act, and the Virginia Human Rights Act.

GOV-3101.3 – Reporting Potential Discrimination and Harassment

The University strongly encourages prompt reporting of incidents that may constitute discrimination or harassment. Any member of the University community who believes that they may have been, or know someone who may have been, discriminated against or subjected to harassment, including sexual harassment, in violation of the University's policy, should report that concern or those concerns.

The University prohibits retaliation or retribution, in any form, against an individual who reports, in good faith, an actual, potential or suspected violation of this policy. See the related policies listed below.

Anyone who believes that they or someone they know has experienced discrimination or harassment in violation of this policy against discrimination or related University policies should report that concerns as follows:

- *For cases involving students, either as the subject of the alleged discrimination or as the person alleged to be discriminating, contact:*
Tracy Cassalia, Deputy Title IX Coordinator for Students, at (804) 289-8464, tcassali@richmond.edu.
- *For disability related concerns, contact:*
Cort Schneider, Director of Disability Services at (804) 662-3017, cschnei2@richmond.edu.
- *For matters involving faculty or staff either as the subject of possible discrimination, or as the person alleged to be discriminating contact:*
Geraldine Sullivan, Chief Human Resources Officer and Deputy Title IX Coordinator for Employees at (804) 289-8166, geraldine.sullivan@richmond.edu.

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- *Reports may also be directed to:*

Kristine Henderson, Director of Compliance and Title IX Coordinator at (804) 289-8186, khender3@richmond.edu.

While the University encourages people to report concerns regarding alleged discrimination or harassment directly to the individuals listed above, reports may also be made via the University’s Ethics and Compliance Helpline. The Ethics and Compliance Helpline can be reached at (804) 287-1800 or by submitting an [online report](#).

GOV 3101.4 – Grievance and Complaint Process

The University’s policies and procedures for responding to reports of discrimination and harassment, referred to as grievance procedures, are set forth in University policies intended to supplement and complement this policy. Those policies are identified below.

A. Students

- Reports of Discrimination Based on Sex - See the University of Richmond [Policy on Prohibiting and Responding to Sex Discrimination - Students](#).
- Reports of Sexual Harassment or Sexual Misconduct – See the University of Richmond [Policy on Prohibiting and Responding to Sexual Harassment/Sexual Misconduct - Students](#).
- Reports of Discrimination or Harassment Based on Race, Color, National Origin, Disability or other Protected Status – See the University of Richmond [Policy on Prohibiting and Responding to Discrimination Based on Protected Status - Students](#).

B. Staff and Faculty

- Reports of Discrimination Based on Sex - See the University of Richmond [Policy on Prohibiting and Responding to Sex Discrimination - Faculty and Staff](#).
- Reports of Sexual Misconduct or Sexual Harassment – See the University of Richmond [Policy on Prohibiting and Responding to Sexual Harassment/Sexual Misconduct – Faculty and Staff](#).
- Reports of Discrimination or Harassment Based on Race, Color, National Origin, Disability or other Protected Status – See the University of Richmond [Policy on Prohibiting and Responding to Discrimination Based on Protected Status – Faculty and Staff](#).
- Reports of Discrimination Based on Parental, Family, or Marital Status or Pregnancy or Related Conditions – See the University of Richmond [Policy on Pregnancy, Childbirth, Lactation and Related Conditions – Faculty and Staff](#)

GOV 3101.5 – Publication of Notice of Nondiscrimination

This policy serves as the University of Richmond’s notice of nondiscrimination under Title IX and its implementing regulations and is intended to provide information to University students and prospective students regarding the scope of the University’s obligations under Title VI, consistent with 34 CFR §100.6(d).

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The University will maintain a current copy of this policy/notice of nondiscrimination in the University's Policy Library, which is available on the University's website at: [Policy Library - University Policies - University of Richmond](#). Links to this policy will also be available on the University's compliance webpage at [Compliance - University of Richmond](#).

Due to the size of this policy and the format and size of University handbooks, catalogs, announcements, bulletins, and applications, the entire text of this policy/notice of nondiscrimination will not be included in such documents. Instead, each University catalog or primary brochure dealing with student admissions, programs and scholarships shall include the following statement:

The University of Richmond prohibits discrimination and harassment against applicants, students, faculty or staff on the basis of race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity, gender expression, disability, status as a veteran or any classification protected by local, state or federal law.

The University's admissions website(s) will include a reference or link to this policy or the foregoing statement.

GOV 3101.6 – Questions and Additional Information

For questions about this policy, including the application of Title IX and its implementing regulations, please contact the University's Director of Compliance and Title IX Coordinator, Kristine Henderson Fountain Hall, Suite 101, (804) 289-8186, khender3@richmond.edu. Further information about the application of Title IX and its implementing regulations is available from the Assistant Secretary for Civil Rights, U.S. Department of Education, Office of Civil Rights, 400 Maryland Avenue, SW, Washington, DC, 20202-1100; 800-421-3481; OCR@ed.gov; or <http://www.ed.gov/ocr>.

RELATED POLICIES:

GOV-1004 - Policy Prohibiting Retaliation

GOV-3108 – Interim Policy on Prohibiting and Responding to Sex Discrimination – Students

GOV-3107 – Interim Policy on Prohibiting and Responding to Sex Discrimination – Faculty and Staff

GOV-3103 – Interim Policy on Prohibiting and Responding to Sexual Harassment/Sexual Misconduct- Students

GOV-3104 – Interim Policy on Prohibiting and Responding to Sexual Harassment/Sexual Misconduct - Faculty and Staff

GOV-3106 - Policy on Prohibiting and Responding to Discrimination Based on Protected Status- Faculty and Staff

GOV –3102 - Policy on Prohibiting and Responding to Discrimination Based on Protected Status – Students

HRM-5008- Policy on Pregnancy, Childbirth, Lactation and Related Conditions – Faculty and Staff

POLICY BACKGROUND:

This policy was updated in 2024 to identify the grievance processes for discrimination and harassment, set forth in the related policies listed above. It was also updated to include specific requirements for publishing

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notice of the University’s statement of non-discrimination. At the time this policy update was finalized, there were two federal court injunctions temporarily enjoining the implementation and enforcement of Title IX regulations issued by the Department of Education in April 2024, which included additional requirements for publishing the notice of non-discrimination. This policy will be updated to ensure compliance with the 2024 regulations if the applicable injunctions are lifted.

The August 2020 version this policy included revisions to be in compliance with the Final Rule for Non-Discrimination on the Basis of Sex in Education Programs or Activities receiving Federal Financial Assistance (Title IX) issued from the Department of Education on May 19, 2020

The procedures and contacts listed in this policy are regularly updated and are not subject to review and approval by the Board of Trustees. Such updates to procedures and contact information are not reflected in the revisions history; revisions refer strictly to the policy.

POLICY CONTACTS:

Director of Compliance and Title IX Coordinator