

ADMINISTRATIVE RESOLUTION FOR ALLEGED VIOLATIONS OF THE POLICY ON EQUAL OPPORTUNITY, HARASSMENT AND NONDISCRIMINATION (KNOWN AS PROCESS “B”)

Initial Assessment

The Administrator conducts an initial assessment, typically within five (5) business days of receiving Notice.¹ The initial assessment typically includes:

- Assessing whether the reported conduct may reasonably constitute a Policy violation
- Determining whether Bowie State University has jurisdiction over the reported conduct
- Offering and coordinating supportive measures for the Parties
- Notifying the Complainant, or the person who reported the allegation(s), of the available resolution options
- Determining whether the Complainant wishes to file a Formal Complaint
- Notifying the Respondent of the available resolution option if a Formal Complaint is made

Helping a Complainant to Understand Resolution Options

If the Complainant indicates they wish to initiate the Administrative Resolution Process, the Administrator will work with the Complainant to determine which resolution option they want to pursue. The Administrator will seek to abide by the wishes of the Complainant but may have to take an alternative approach depending on their analysis of the situation.

Upon receiving a complaint that falls under the Administrative Resolution Process, the Administrator will initiate an investigation.

If any party indicates that they want to pursue an Informal Resolution option, the Administrator will refer the matter to the appropriate individuals(s) if the Administrator determines Informal Resolution is available and the other Parties consent to participate.

If the Complainant does not want any action taken, the Administrator will consider that request, and in most circumstances, no resolution process will be initiated (unless deemed necessary by the Administrator), though the Complainant can elect to initiate one later, if desired.

¹ If circumstances require, the Director of the Office of Equity Compliance or Administrator will designate another person to oversee the resolution process should an allegation be made about the Administrator or the Administrator be otherwise unavailable, unable to fulfill their duties, or have a conflict of interest.

The Administrator may consider elements such as patterns of behavior, predation, threats, violence, use of weapons, or involvement of minors in determining whether to initiate a resolution process.

Administrator Authority to Initiate the Administrative Resolution Process

The Administrator has ultimate discretion as to whether to pursue an Administrative Resolution Process and may consult with appropriate Bowie State University Employees, and/or conduct a violence risk assessment to aid their determination whether to initiate a complaint.

When the Administrator initiates a complaint, they do not become the Complainant. The Complainant is the person who experienced the alleged misconduct. If the Administrator declines to initiate a complaint, alternative processes may be available and can be explored with the Administrator.

The process followed considers the Parties' preference but is ultimately determined at the Administrator's discretion. If at any point during the initial assessment or investigation, the Administrator determines that reasonable cause does not support the conclusion that Respondent violated the Policy, the process will end, and the Parties will be notified.

The Complainant may request that the Administrator review the reasonable cause determination and/or reopen the investigation. This decision lies in the sole discretion of the Administrator, but the request is usually only granted in extraordinary circumstances.

1. Interim Suspension

Bowie State University may interim suspend a Student accused of Discrimination, Harassment, Retaliation, or Other Prohibited Conduct upon receipt of Notice or at any time during the Administrative Resolution Process.

When an Interim Suspension is imposed, wholly or partially, the affected Student will be notified of the action, which will include a written rationale, and the option to challenge the interim suspension within two (2) business days of the notification. Upon receipt of a challenge, the Administrator will meet with the student (and their Advisor, if desired) as soon as reasonably possible thereafter to allow them to show cause why the removal/action should not be implemented or should be modified.

This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the interim suspension is appropriate, should be modified, or should be lifted. When this meeting is not requested within two (2) business days, objections to the interim suspension will be deemed waived. A Student can later request a meeting to show why they no longer pose a safety concern because the related conditions have

changed. A Complainant and their Advisor may be permitted to participate in this meeting if the Administrator determines it is fair for them to do so.

The Respondent may provide information, including expert reports, witness statements, communications, or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Administrator for review.

An interim suspension may be affirmed, modified, or lifted as a result of a requested review or as new information becomes available. The Administrator will communicate the final decision in writing, typically within three (3) business days of the review meeting.

2. Placing an Employee on Leave

When the Respondent is an Employee, or a Student-Employee, accused of misconduct in the course of their employment, existing provisions outlined in the Employee/Faculty handbooks for interim action are typically applicable instead of the above emergency removal process. Procedures for unionized Employees can be found in the collective bargaining agreement.

3. Counter-Complaints

Bowie State University is obligated to ensure that the Administrative Resolution Process is not abused for retaliatory purposes. Although Bowie State University permits the filing of counter-complaints, the Administrator will use an initial assessment, described above, to assess whether the allegations in the counterclaim are made in good faith. When counter-complaints are not made in good faith, they will not be permitted. They will be considered potentially retaliatory and may constitute a Policy violation.

Counter-complaints determined to have been reported in good faith will be processed using the Administrative Resolution Process below. At the Administrator's discretion, investigation of such claims may take place after resolution of the underlying initial allegations.

4. Advisors in the Administrative Resolution Process

The Parties may each have an Advisor of their choice present with them for all meetings and interviews within the Administrative Resolution Process.

Choosing an Advisor who is also a witness in the process creates potential for bias and conflict of interest. A party that chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-maker.

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. Parties are expected to provide the Administrator with timely notification if they change Advisors. If a party changes Advisors, consent to share information with the previous Advisor is assumed to be terminated, and a release for the new Advisor must be submitted.

Upon request, and at the Administrator's discretion, the Parties may be permitted to have more than one Advisor. To ensure fairness, if one party is allowed another Advisor, the other party must be allowed one as well.

[As a public entity, Bowie State University fully respects and accords the Weingarten rights of Employees, meaning that for Parties who are entitled to union representation, Bowie State University will allow the unionized Employee to have their union representative (if requested by the party), as well as an Advisor of their choice present for all resolution-related meetings and interviews. To uphold the principles of fairness, the other party (regardless of union membership) will also be permitted to have two Advisors. Witnesses are not permitted to have union representation or Advisors in resolution process interviews or meetings.

Who Can Serve as an Advisor?

The Parties may each have an Advisor (friend, mentor, family member, attorney, or any other individual a party chooses) present with them for all meetings, interviews, and hearings within the resolution process. The Parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available.²

The Administrator will offer to assign a trained Advisor to any party. If the Parties choose an Advisor from Bowie State University's Resolution Process Pool, Bowie State University will have trained the Advisor and familiarized them with Bowie State University's Administrative Resolution Process.

Bowie State University cannot guarantee equal advisory rights, meaning that if one party selects an Advisor who is an attorney, but the other party does not, or cannot afford an attorney, Bowie State University is not obligated to provide an attorney to advise that party.

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. Parties are expected to provide the Administrator with timely notification if they change Advisors. If a party changes Advisors, consent to share

² "Available" means the party cannot insist on an Advisor who simply doesn't have inclination, time, or availability. Also, the Advisor cannot have institutionally conflicting roles, such as being a Title IX administrator who has an active role in the matter, or a supervisor who must monitor and implement sanctions.

information with the previous Advisor is assumed to be terminated, and a release for the new Advisor must be submitted.

Bowie State University may permit Parties to have more than one Advisor, or an Advisor and a support person, upon special request to the Administrator. The decision to grant this request is at the Administrator's sole discretion and will be granted equitably to all Parties.

If a party requests that all communication be made through their attorney Advisor instead of to the party, Bowie State University will not comply with that request but will agree to copy both the party and their Advisor on all communications.

Advisor's Role in the Administrative Resolution Process

Advisors should help the Parties to prepare for each meeting and are expected to advise ethically, with integrity, and in good faith. Advisors may not provide testimony or speak on behalf of their advisee unless given specific permission to do so.

The Parties are expected to respond to questions on their own behalf throughout the Administrative Resolution Process. Although the Advisor generally may not speak on behalf of their advisee, the Advisor may consult with their advisee, either privately as needed, or by conferring or passing notes during any Administrative Resolution Process meeting or interview. For longer or more involved discussions, the Parties and their Advisors should ask for breaks to allow for private consultation.

Records Shared with Advisors

Advisors are entitled to the same opportunity as their advisee to receive copies of the Draft and Final Investigation Reports. Parties will be asked to sign releases for Bowie State University to share materials with an Advisor.

Advisors are expected to maintain the confidentiality of the records that Bowie State University shares with them. Accordingly, Advisors will be asked to sign Non-Disclosure Agreements (NDAs). Bowie State University may decline to share materials with any Advisor who has not executed the NDA. Bowie State University may restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by Bowie State University's confidentiality expectations.

Advisor Expectations

Bowie State University generally expects an Advisor to adjust their schedule to allow them to attend Bowie State University meetings/interviews when planned, but Bowie State

University may change scheduled meetings to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay.

Bowie State University may also make reasonable provisions to allow an Advisor who cannot be present in person to attend a meeting/interview by telephone, video conferencing, or other similar technologies as may be convenient and available.

All Advisors are subject to the same Bowie State University policies and procedures, whether they are attorneys or not, and whether they are selected by a party or appointed by Bowie State University. Advisors are expected to advise without disrupting proceedings.

Advisor Policy Violations

Any Advisor who oversteps their role as defined by the Policy, who shares information or evidence in a manner inconsistent with the Policy, or who refuses to comply with Bowie State University's established rules of decorum will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting/interview/hearing may be ended, or other appropriate measures implemented, including Bowie State University requiring the party to use a different Advisor or providing a different Bowie State University-appointed Advisor. Subsequently, the Administrator will determine how to address the Advisor's non-compliance and future role.

5. Resolution Options Overview

The Administrative Resolution Process is Bowie State University's primary resolution approach unless all Parties and Bowie State University agree to an Informal Resolution. The process considers the Parties' preferences but is ultimately determined at the Administrator's discretion.

Resolution proceedings are private. All persons present at any time during a resolution process are expected to maintain the privacy of the proceedings in accordance with the Policy.

Informal Resolution

To initiate Informal Resolution, a Complainant or Respondent may make such a request to the Administrator at any time prior to a Final Determination, or the Administrator may offer the option to the Parties. Bowie State University will obtain voluntary, written confirmation that all Parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the Parties to participate in Informal Resolution.

Four approaches to Informal Resolution are detailed in this section.

- 1) **Supportive Resolution.** When the Administrator can resolve the matter informally by providing supportive measures (only) designed to remedy the situation. Supportive Resolution involves only the party who opts for it.
- 2) **Educational Conversation.** When the Administrator can resolve the matter informally by having a conversation with the Respondent to discuss the Complainant's concerns and institutional expectations, or can accompany the Complainant in their desire to confront the conduct.
- 3) **Accepted Responsibility.** When the Respondent accepts responsibility for violating Policy and accepts the recommended sanction(s), and the Complainant(s) and Bowie State University agree to the resolution terms.
- 4) **Alternative Resolution.** When the Parties agree to resolve the matter through an alternative resolution mechanism (which could include, but is not limited to, mediation, shuttle negotiation, restorative practices, facilitated dialogue, etc.), as described below.

It is not necessary to pursue Informal Resolution first in order to pursue an Administrative Process. Any party participating in Informal Resolution can withdraw from the Informal Resolution Process at any time and initiate or resume the Administrative Resolution Process.

The Parties may agree, as a condition of engaging in Informal Resolution, on what statements made or evidence shared during the Informal Resolution process will not be considered in the Administrative Resolution Process should Informal Resolution not be successful.

If an investigation is already underway, the Administrator has discretion to determine if an investigation will be paused, if it will be limited, or if it will continue during the Informal Resolution process.

Prior to implementing Informal Resolution, Bowie State University will provide the Parties with written notice of the reported misconduct and any sanctions (only in the case of Accepted Responsibility) or measures that may result from participating in such a process, including information regarding any records that will be maintained or shared by Bowie State University.

Informal Resolution Approaches

Supportive Resolution

Most commonly offered once a complaint is filed (whereas supportive measures, as described in Section 9 of the Policy, are offered in response to Notice). The Administrator will meet with the Complainant to determine reasonable supports that are designed to restore or preserve the Complainant's access to Bowie State University's education program and activity. Such supports can be modified as the Complainant's needs evolve over time or circumstances change. If the Respondent has received the NOIA, the Administrator may also provide reasonable support for the Respondent as deemed appropriate. This option is available when the Complainant does not want to engage the other resolution options, and the Administrator does not believe there is a need to sign a complaint. At the discretion of the Administrator, this resolution option can result in an agreement between the Complainant and Bowie State University that does not require assent from any other party, as long as it does not unduly burden any other party or function punitively with respect to them.

Educational Conversation

The Complainant(s) may request that the Administrator address their allegations by meeting (with or without the Complainant) with the Respondent(s) to discuss concerning behavior and institutional policies and expectations. Such a conversation is non-disciplinary and non-punitive. Respondent(s) are not required to attend such meetings, nor are they compelled to provide any information if they attend. The conversation will be documented as the Informal Resolution for the matter, if it takes place. In light of this conversation, or the Respondent's decision not to attend, the Administrator may also implement remedial actions to ensure that policies and expectations are clear and to minimize the risk of the recurrence of any behaviors that may not align with Policy.

Accepted Responsibility

The Respondent may accept responsibility for any or all of the alleged Policy violations at any point during the Administrative Resolution Process. If the Respondent indicates an intent to accept responsibility for **all** alleged Policy violations, the ongoing process will be paused, and the Administrator will determine whether Informal Resolution is an option.

If Informal Resolution is available, the Administrator will determine whether all Parties and Bowie State University are able to agree on responsibility, restrictions, sanctions, restorative measures, and/or remedies. If so, the Administrator implements the accepted finding that the Respondent is in violation of Bowie State University Policy, implements agreed-upon restrictions and remedies, and determines the appropriate responses in coordination with other appropriate administrator(s), as necessary.

This resolution is not subject to appeal once all Parties indicate their written agreement to all resolution terms. When the Parties cannot agree on all terms of resolution, the Administrative Resolution Process will either begin or resume.³

When a resolution is reached, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the Discrimination or Harassment, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

Alternative Resolution

The institution offers a variety of alternative resolution mechanisms to best meet the specific needs of the Parties and the nature of the allegations. Alternative resolution may involve agreement to pursue individual or community remedies, including targeted or broad-based educational programming or training; supported direct conversation or interaction with the Respondent(s); indirect action by the Administrator or other appropriate Bowie State University officials; and other forms of resolution that can be tailored to the needs of the Parties. Some alternative resolution mechanisms will result in an agreed-upon outcome, while others are resolved through dialogue. All Parties must consent to the use of an alternative resolution approach, and the Parties may, but are not required to, have direct or indirect contact during an alternative resolution process.

The Administrator may consider the following factors to assess whether an alternative resolution is appropriate, or which form of alternative resolution may be most successful for the Parties:

- The Parties' amenability to alternative resolution
- Likelihood of potential resolution, considering any power dynamics between the Parties
- The nature and severity of the alleged misconduct
- The Parties' motivation to participate
- Civility of the Parties
- Results of a violence risk assessment/ongoing risk analysis
- Respondent's disciplinary history
- Whether interim action is needed
- Skill of the alternative resolution facilitator with this type of Complaint
- Complaint complexity
- Emotional investment/capability of the Parties
- Rationality of the Parties

³ The Parties may not want discussions that take place within Informal Resolution to be admissible in a later Resolution Process, but essential facts must and do transfer from the informal process to subsequent resolution proceedings.

- Goals of the Parties
- Adequate resources to invest in alternative resolution (e.g., time, staff)

The Administrator has the authority to determine whether an alternative resolution is available or successful, to facilitate a resolution that is acceptable to all Parties, and/or to accept the Parties' proposed resolution, usually through their Advisors, often including terms of confidentiality, release, and non-disparagement.

Parties do not have the authority to stipulate restrictions or obligations for individuals or groups that are not involved in the alternative resolution process. The Administrator will determine whether additional individual or community remedies are necessary to meet the institution's compliance obligations in addition to the alternative resolution.

The Administrator maintains records of any resolution that is reached and will provide notification to the Parties of what information is maintained. Failure to abide by the resolution agreement may result in appropriate responsive/disciplinary actions (e.g., dissolution of the agreement and resumption of the Administrative Resolution Process, referral to the conduct process for failure to comply, application of the enforcement terms of the agreement). Where the failure to abide by the Informal Resolution agreement terms results in a failure to remedy a Policy violation, the Administrator must consider whether to dissolve the agreement and reinstate the Administrative Resolution Process to remedy the impact as required by law. The results of reports resolved by alternative resolution are not appealable.

If an Informal Resolution option is not available or selected, Bowie State University will initiate or continue an investigation and subsequent Administrative Resolution Process to determine whether the Policy has been violated.

Administrative Resolution Process

Administrative Resolution can be pursued at any time during the process for any behavior for which the Respondent has not accepted responsibility that would constitute conduct covered by the Policy if proven. Administrative Resolution starts with a thorough, reliable, and impartial investigation.

If Administrative Resolution is initiated, the Administrator will provide written notification of the investigation to the Parties at an appropriate time during the investigation. Typically, notice is given at least two (2) business days in advance of an interview. Advanced notice facilitates the Parties' ability to identify and choose an Advisor, if any, to accompany them to the interview.

Written notification will include a meaningful summary of the allegations and the policies alleged to have been violated, and may be delivered by one or more of the following

methods: in person or emailed to the Parties' Bowie State University-issued or other approved email account. Once emailed, and/or received in person, notice is presumptively delivered.

Bowie State University aims to complete all investigations within a sixty (60)-business-day time period, which can be extended by the Administrator as necessary for appropriate cause. Investigations can take weeks or even months, depending on the nature, extent, and complexity of the allegations, availability of witnesses, police involvement, etc.

Once an investigation is initiated, the Administrator appoints an Investigator(s) to conduct it. These Investigators may be members of the Pool, or any other properly trained Investigator, whether internal or external to the Bowie State University community.

Bowie State University will make a good faith effort to complete the investigation as promptly as circumstances permit and will communicate regularly with the Parties to update them on the progress and timing of the investigation.

Bowie State University action(s) are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

All investigations are thorough, reliable, impartial, prompt, and fair. They involve interviewing all available, relevant Parties and witnesses, obtaining Relevant Evidence, and identifying sources of expert information, as necessary.

6. Resolution Process Pool

Bowie State University relies on a pool of individuals (the "Pool") to carry out the resolution options.

Pool Member Roles⁴

Pool members are trained annually and can serve in any of the following roles, at the Administrator's discretion:

- Appropriate intake of and initial guidance pertaining to Notice
- Perform or assist with initial assessment
- Advisor to Parties

⁴ External, trained third-party neutral professionals may also serve in Pool roles.

- Informal Resolution Facilitator
- Investigator
- Decision-maker
- Appeal Decision-maker

Pool Member Appointment

The Administrator appoints the Pool, which acts with independence and impartiality.⁵ Although members of the Pool are typically trained in a variety of skill sets and can rotate amongst the different roles listed above in different complaints, Bowie State University can also designate permanent roles for individuals in the Pool.

7. Notice of Investigation and Allegations

The Administrator will provide the Parties written Notice of the Investigation and Allegations (the “NOIA”) upon commencement of the Administrative Resolution Process. Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available. For climate/culture investigations that do not have an identifiable Respondent, the NOIA will be sent to the department/office/program head for the area/program being investigated.

⁵ This does not preclude Bowie State University from having all members of the Pool go through an application and/or interview/selection process.

The NOIA will include:

- A meaningful summary of all allegations
- The names of the involved Parties (if known)
- The precise misconduct being alleged
- The date and location of the alleged incident(s) (if known)
- The specific policies/offenses implicated
- A description of, link to, or copy of the applicable procedures
- A statement that Bowie State University presumes the Respondent is not responsible for the reported misconduct unless and until the evidence supports a Final Determination that the Policy has been violated
- The name(s) of the Investigator(s), along with a process to notify the Administrator of any conflict of interest that the Investigator(s) may have in advance of the interview process
- A statement that determinations of responsibility are made at the conclusion of the process and that the Parties will be given an opportunity during the review and comment period to inspect and review all Relevant Evidence obtained
- A statement of the potential sanctions/responsive actions that could result
- A statement about Bowie State University's policy on Retaliation
- Information about process confidentiality
- Information on the need for each party to have an Advisor of their choosing and suggestions for ways to identify an Advisor
- A statement informing the Parties that Bowie State University's Policy prohibits knowingly making false statements, including knowingly submitting false information during the Administrative Resolution Process
- Information about how a party may request disability accommodations or other support assistance during the Administrative Resolution Process
- A link to Bowie State University's VAWA Brochure, if applicable
- An instruction to preserve any evidence that is directly related to the allegations
- A statement that Parties who are members of a union are entitled to union representation throughout the process

Notification will be made in writing and may be delivered by one or more of the following methods: in person or emailed to the Parties' Bowie State University-issued email or other approved accounts. Once emailed, and/or received in person, notice is presumptively delivered.

8. Resolution Timeline

Bowie State University will make a good faith effort to complete the Administrative Resolution Process within thirty to sixty (30-60) business days, including any appeals, which the Administrator can extend as necessary for appropriate cause. The Parties will receive regular

updates on the progress of the Administrative Resolution Process, as well as notification and a rationale for any extensions or delays, and an estimate of how much additional time will be needed to complete the process.

Investigations are completed expeditiously, normally within thirty (30) business days, though some investigations may take longer, depending on the nature, extent, and complexity of the allegations, witness availability, law enforcement involvement, and other factors.

Bowie State University may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include, but are not limited to, a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of Parties and/or witnesses, and/or health conditions. Bowie State University will promptly resume its Administrative Resolution Process as soon as feasible. During such a delay, Bowie State University will implement and maintain supportive measures for the Parties as deemed appropriate.

Bowie State University action(s) or processes are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

Bowie State University will make a good faith effort to complete the Administrative Resolution Process as promptly as circumstances permit and will regularly communicate with the Parties to update them on the progress and timing of the process.

9. Ensuring Impartiality

No individual materially involved in the administration of the Administrative Resolution Process, including the Administrator, Investigator(s), and Decision-maker(s), may have or demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

The Administrator will vet the assigned Investigator(s), Decision-maker(s), and Appeal Decision-maker(s) for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. The Parties may raise a concern regarding bias or conflict of interest at any time during the Administrative Resolution Process, and the Administrator will determine whether the concern is reasonable and supportable. If so, another Pool member, or other trained individual, will be assigned, and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Administrator, concerns should be raised with the Director of the Office of Equity Compliance.

The Administrative Resolution Process involves an objective evaluation of all Relevant Evidence obtained, including evidence that supports that the Respondent violated the Policy and

evidence that supports that the Respondent did not violate the Policy. Credibility determinations will not be based solely on an individual's status or participation as a Complainant, Respondent, or witness. All Parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence, and to receive a written Investigation Report that accurately summarizes this evidence.

10. Investigation

All investigations are thorough, reliable, impartial, prompt, and fair. They involve interviewing all available, relevant Parties and witnesses, obtaining Relevant Evidence, and identifying sources of expert information, as necessary.

After an interview, Parties and witnesses will be asked to verify the accuracy of the recording, transcript, or summary of their interview. They may submit changes, edits, or clarifications. If the Parties or witnesses do not respond within the time period designated for verification, objections to the accuracy of the recording, transcript, or summary will be deemed to have been waived, and no changes will be permitted.

Bowie State University may consolidate Complaints against more than one Respondent, or by more than one Complainant against one or more Respondent(s), when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.

Investigations involve the following:

- Determining the identity of and contacting all involved Parties and potential witnesses to participate in an investigation interview
- Identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for the Parties and witnesses
- Providing written notification of the date, time, and location of all investigation meetings, including the expected participants and purpose
- Conducting any necessary follow-up interviews with Parties or witnesses
- Providing the Parties and witnesses an opportunity to verify the accuracy of either a summary or transcript of their interview(s)
- Soliciting the names of suggested witnesses and questions each party wishes to have asked of another party or witness
- Writing a Draft Investigation Report that gathers, assesses, and synthesizes the evidence, accurately summarizes the investigation and party and witness interviews, and provides all Relevant Evidence
- Providing the Parties and their respective Advisors with an electronic or hard copy of the Draft Investigation Report for a ten (10) business-day review and comment period so

that each party may meaningfully respond to the evidence. The Parties may elect to waive the full ten (10) days.

- Incorporating any new, Relevant Evidence and information obtained through the Parties' review of the Draft Investigation Report and any follow-up meetings into the Final Investigation Report
- Responding in writing (typically within the Final Investigation Report) to the relevant elements of the Parties' responses to the Draft Investigation Report
Sharing the Final Investigation Report with the Administrator and/or legal counsel for their review and feedback
- Providing the Administrator with the Final Investigation Report, including recommending Findings and a Final Determination of whether the Respondent violated the Policy.

11. Investigation Process Details

Witness Role and Participation in the Investigation

Witnesses who are Bowie State University Employees are strongly encouraged to cooperate with and participate in Bowie State University's investigation and Administrative Resolution Process. Student witnesses and witnesses from outside the Bowie State University community are encouraged to cooperate with Bowie State University investigations and to share what they know about a complaint.

Party and/or witness interviews may be conducted in person, via online video platforms (e.g., Zoom, Microsoft Teams, FaceTime, WebEx), or, in limited circumstances, by telephone. Bowie State University will take appropriate steps to ensure the security/privacy of remote interviews.

Parties and witnesses may also provide written statements in lieu of interviews or choose to respond to written questions, if deemed appropriate by the Investigator(s), though not preferred.

Interview Recording

It is standard practice for Investigators to create a record of all interviews pertaining to the Administrative Resolution Process by recording, transcribing, or writing a summary. The Parties may review copies of their own interviews upon request. No unauthorized audio or video recording of any kind is permitted during investigation meetings.

All interviews are recorded, and all involved persons should be made aware of the audio and/or video recording. The recording and/or transcript of those meetings will be provided to the Parties for their review, after which the Parties may suggest additional questions to be asked of another party or witness or additional witnesses. Those subsequent meetings or interviews are also recorded and/or transcribed.

Evidentiary Considerations

The Parties must provide all evidence to the Investigator(s) prior to completion of the Final Investigation Report. Evidence offered after that time will be evaluated by the Decision-maker for relevance. If deemed relevant, the Parties and Decision-maker must agree to admit it into the record. If the evidence is deemed not relevant, the Decision-maker may proceed with making Findings and a Final Determination absent the new evidence.

The new Relevant Evidence will be admitted to the record if:

- All Parties and the Decision-maker assent to the new evidence being considered without remanding the matter back to the Investigator,
- The evidence is not duplicative of evidence already in the record, and
- The new evidence was either not reasonably available prior to the conclusion of the Final Investigation Report, or the failure to provide it in a timely manner was not the result of bad faith by the Parties, witnesses, or others.

If the above criteria are not met, but the evidence is deemed materially relevant and not duplicative, the Decision-maker may, at their discretion, engage in any of the following actions:

- Provide the Parties with at least five (5) business days to review the Relevant Evidence
- Remand the matter back to the Investigator for further investigation or analysis
- Allow the Parties time to review and comment on the new evidence

If the evidence is deemed not relevant, the Decision-maker may proceed with making Findings and a Final Determination without allowing the new evidence.

Any evidence that is relevant and credible may be considered, including a Respondent's prior disciplinary history as well as evidence indicating a pattern of misconduct, subject to the limitation in (D) below. The process should exclude irrelevant or immaterial evidence and may disregard evidence lacking in credibility or that is improperly prejudicial.

Evidentiary Exclusions

Unless the Decision-maker determines it is appropriate, the investigation and the Finding do not consider: (1) incidents not directly related to the possible violation(s), unless they evidence a pattern; (2) the irrelevant sexual behavior of the Parties (though there may be a limited exception made with regard to the sexual behavior between the Parties); (3) irrelevant character evidence.

Although the Respondent's previous conduct violations (if any) are not generally admissible as information supporting the current allegation(s), the Investigator(s) may supply the Decision-maker with information about previous good-faith allegations and/or findings when that information suggests potential pattern and/or predatory conduct.

Bowie State University uses a progressive discipline system; thus, previous disciplinary action of any kind involving the Respondent may be considered in determining the appropriate sanction(s).]

Character witnesses or evidence may be offered. The Decision-maker will determine if the character evidence is relevant. If so, it may be considered. If not, it will be excluded.

A party or witness's records that are made or maintained by a physician, psychologist, or psychiatrist are inadmissible unless the party or witness provides voluntary, written consent for the records to be considered.

Respondent Admits Responsibility

If a Respondent elects to admit to the charged violations and waive further process at any point in the Administrative Resolution Process, the Decision-maker is authorized to accept that admission, adopt it as their Finding/Final Determination, and administer sanctions. This would waive the Respondent's right to appeal. If the Respondent rejects the Finding/Final Determination/sanctions, or does not admit to all charged violations, the Administrative Resolution Process continues to its conclusion. The Complainant retains their right to appeal a Final Determination when a Respondent admits responsibility.

12. Determination

Within two to three (2-3) business days of receiving the Investigator's Final Investigation Report, the Administrator or their designee reviews the report and all responses, and then makes the Final Determination by applying the standard of evidence.⁶

If the record is incomplete, the Decision-maker may direct the Investigator(s) to re-open the investigation, or may direct or conduct any additional inquiry necessary, including meeting informally with the Parties or any witnesses if needed.

The Decision-maker may invite and consider impact and/or mitigation statements from the Parties when determining appropriate sanction(s), if any.

13. Notice of Outcome

The Administrator will provide the Parties a written outcome notification within three (3) business days of the Resolution. The outcome notification will specify the Finding for each alleged Policy violation, any sanction(s) that may result, which Bowie State University is permitted to share pursuant to federal or state law, and a detailed rationale, written by the Decision-maker, supporting the Findings to the extent Bowie State University is permitted to share under federal or state law.

The notification will also detail the Parties' equal rights to appeal, the grounds for appeal, the steps to request an appeal, and when the determination is considered final if no party appeals. Unless based on the Respondent's admission of responsibility, the Determination may be appealed by any party.

The Administrator will provide the Parties with the outcome notification, or without a significant time delay between notifications. Notice may be delivered by one or more of the following methods: in person or emailed to the Parties' Bowie State University-issued or other approved email account. Once emailed, and/or received in person, notice is presumptively delivered.

14. Sanctions

Factors the Decision-maker may consider when determining sanctions and responsive action include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s)

⁶ When the Administrator is the Investigator or has been heavily involved in the process prior to a determination, a Decision-maker should be designated from the Pool to ensure there is no conflict of interest.

- The Respondent's disciplinary history
- The need for sanctions/responsive actions to bring an end to the Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct
- The need for sanctions/responsive actions to prevent the future recurrence of Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct
- The need to remedy the effects of Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct on the Complainant and the community
- The impact on the Parties
- The Respondent's acknowledgement of responsibility or contrition
- Any other information deemed relevant by the Decision-maker

The sanctions will be implemented as soon as is feasible once a Determination is final, either upon the outcome of any appeal or the expiration of the window to appeal, without an appeal being requested.

The sanctions described in the Procedures are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed, by external authorities.

Student Sanctions⁷

The following are the common sanctions that may be imposed upon Students singly or in combination:

- *Reprimand*: A formal statement that the conduct was unacceptable and a warning that further violation of any Bowie State University policy, procedure, or directive will result in more severe sanctions/responsive actions
- *Required Counseling*: A mandate to meet with and engage in either Bowie State University-sponsored or external counseling to better comprehend the misconduct and its effects
- *Restrictions*: A Student may be restricted in their activities, including, but not limited to, being restricted from locations, programs, participation in certain activities or extracurriculars, study abroad, or holding leadership roles in student organizations
- *Probation*: An official sanction for violation of Bowie State University policy, providing for more severe disciplinary sanctions if the Student is found in violation of any Bowie State University policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- *Suspension*: Separation from Bowie State University, or one or more of its facilities, for a defined period of time, typically not to exceed two (2) years, after which the

⁷ Bowie State University policies on transcript notation will apply to these proceedings.

Student is eligible to return. Eligibility may be contingent upon satisfaction of specific conditions noted at the time of suspension, on successfully applying for readmission, or upon a general condition that the Student is eligible to return if Bowie State University determines it is appropriate to re-enroll/readmit the Student. The Student is typically required to vacate Bowie State University property within 24 hours of notification of the action, though this deadline may be extended at the discretion of the Administrator or other appropriate official. During a Bowie State University-wide suspension, the Student is banned from Bowie State University property, functions, events, and activities unless they receive prior written approval from an appropriate Bowie State University official. This sanction may be enforced with a trespass action, as necessary. This sanction may be noted as a Disciplinary Suspension on the Student's official academic transcript, per Bowie State University policy and/or state law.

- *Expulsion*: Permanent separation from Bowie State University. The Student is banned from Bowie State University property, and the Student's presence at any Bowie State University-sponsored activity or event is prohibited. This action may be enforced with a trespass action, as necessary. This sanction may be noted as Disciplinary Expulsion on the Student's official academic transcript, per Bowie State University policy and/or state law.]
- *Withholding Diploma*: Bowie State University may withhold a Student's diploma for a specified period of time and/or deny a Student's participation in commencement activities as a sanction if the Student is found responsible for violating the Policy
- *Revocation of Degree*: While very rarely exercised, Bowie State University reserves the right to revoke a degree previously awarded by Bowie State University for fraud, misrepresentation, and/or other violation of Bowie State University policies, procedures, or directives in obtaining the degree, or for other serious violations committed by a Student prior to graduation. Revocation can occur when the offense would have otherwise resulted in expulsion if the Respondent were still a student. Delay of degree certification is applicable for any situation that would have resulted in suspension of the Respondent if the Respondent were still a student, and the degree will only be conferred once the degree suspension period is completed. The degree suspension period is usually implemented for the same length of time for which a sanction of suspension would have been imposed if the Respondent were still enrolled.
- *Other Actions*: In addition to, or in place of, the above sanctions, Bowie State University may assign any other sanctions as deemed appropriate

Student Organization Sanctions⁸

The following are the common sanctions that may be imposed upon student group organizations singly or in combination:

- *Warning*: A formal statement that the conduct was unacceptable and a warning that further violation of any Bowie State University policy, procedure, or directive will result in more severe sanctions/responsive actions
- *Probation*: An official sanction for violation of Bowie State University policy, providing for more severe disciplinary sanctions if the group or organization is found in violation of any Bowie State University policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social and event privileges, denial of Bowie State University funds, ineligibility for honors and awards, restrictions on new member recruitment, no-contact orders, and/or other measures deemed appropriate.
- *Suspension*: Termination of student group or organization recognition and/or Bowie State University support for a defined period of time not to exceed two (2) years and/or until specific criteria are met. During the suspension period, a student group or organization may not conduct any formal or informal business or participate in Bowie State University-related activities, whether they occur on or off campus. Re-recognition is possible but not guaranteed, and will only be considered after the end of the suspension period and based on meeting all re-recognition criteria and obtaining clearance from Bowie State University.
- *Expulsion*: Permanent termination of student group or organization recognition and revocation of the privilege to congregate and conduct business on campus as an organization for any reason
- *Loss of Privileges*: Restricted from accessing specific Bowie State University privileges for a specified period of time
- *Other Actions*: In addition to, or in place of, the above sanctions, Bowie State University may assign any other sanctions as deemed appropriate

Employee Sanctions/Responsive/Corrective Actions

Responsive actions for an Employee who has engaged in Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct include:

⁸ Subject to Bowie State University's Student/Organizational Code of Conduct. Organizational sanctions are included here despite the fact that organizations cannot be charged as Respondents under Title IX. However, nothing would prevent Bowie State University from holding a student organization accountable for Policy violations using the Resolution Processes herein, as long as it was clearly noted that Title IX was not applicable. Often, individuals will be charged for their role in organizational misconduct under Title IX, and the organization would be charged with collateral misconduct to the individual charges, resolved in the same process as those charges.

- *Verbal or Written Warning*
- *Performance Improvement Plan/Management Process*
- *Enhanced Supervision, Observation, or Review*
- *Required Counseling*
- *Required Training or Education*
- *Probation*
- *Denial of Pay Increase/Pay Grade*
- *Loss of Oversight or Supervisory Responsibility*
- *Demotion*
- *Transfer*
- *Shift or schedule adjustments*
- *Reassignment*
- *Delay of (or referral for delay of) Tenure Track Progress*
- *Assignment to a New Supervisor*
- *Restriction of Stipends, Research, and/or Professional Development Resources*
- *Suspension/Administrative Leave with Pay*
- *Suspension/Administrative Leave without Pay*
- *Termination*
- *Other Actions: In addition to, or in place of, the above sanctions/responsive actions, Bowie State University may assign any other responsive actions as deemed appropriate*

15. Withdrawal or Resignation Before Complaint Resolution

Students

Should a Respondent decide not to participate in the Administrative Resolution Process, the process proceeds, in the absence of their participation, to a reasonable resolution. If a Student Respondent withdraws from Bowie State University, the Administrative Resolution Process typically ends with a dismissal, as Bowie State University has lost primary disciplinary jurisdiction over the withdrawn Student. However, Bowie State University may continue the Administrative Resolution Process when, at the discretion of the Administrator, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct.

Regardless of whether the Formal Complaint is dismissed or pursued to completion of the Administrative Resolution Process, Bowie State University will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged

violation(s), and any ongoing effects of the alleged Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct.

When a Student withdraws or takes a leave of absence while the process is pending, the Student may not return to Bowie State University in any capacity until the allegations are resolved and any sanctions imposed are satisfied. If the Student indicates they will not return, the Administrator has discretion to dismiss the allegations and bar the Student from returning. The Registrar of Admissions and HR may be notified accordingly.

If the Student Respondent takes a leave of absence for a specified period of time (e.g., one semester or term), the Administrative Resolution Process may continue remotely. If found in violation, that Student is not permitted to return to Bowie State University unless and until all sanctions, if any, have been satisfied.

Employees

Should an Employee Respondent decide not to participate in the Administrative Resolution Process, the process proceeds, in the absence of their participation, to a reasonable resolution. If an Employee Respondent leaves their employment with Bowie State University with unresolved allegations pending, the Administrative Resolution Process typically ends with dismissal, as Bowie State University has lost primary disciplinary jurisdiction over the former Employee. However, Bowie State University may continue the Administrative Resolution Process when, at the discretion of the Administrator, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct.

Regardless of whether the allegations are dismissed or pursued to completion of the Administrative Resolution Process, Bowie State University will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s), and any ongoing effects of the alleged Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct.

When an Employee resigns and the allegations are dismissed, the Employee may not return to Bowie State University in any capacity. The Registrar, Office of Admissions, and HR will be notified accordingly. A note will be placed in the Employee's file that they resigned with allegations pending and are not eligible for academic admission or rehire with Bowie State University. The records retained by the Administrator will reflect that status.

16. Appeals

The Administrator will designate an Appeal Decision-maker from the Pool, or other trained internal or external individuals, to hear the appeal. No Appeal Decision-maker will have been previously involved in the Administrative Resolution Process for the matter. The Administrator will designate a voting chair if a panel is used.

Appeal Grounds

Appeals are limited to the following grounds:

- 1) A procedural irregularity affected the outcome of the matter
- 2) There is new evidence that was not reasonably available at the time the determination regarding responsibility was made that could affect the outcome of the matter
- 3) The Administrator, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter
- 4) The sanctions fall outside the range of sanctions designated for this offense, considering the Respondent's cumulative conduct/disciplinary record (applicable to suspension, expulsion, or termination-level offenses only)

Appeal Request

Any party may submit a written appeal request to the Administrator within five (5) business days of the delivery of the notice of outcome.

The appeal request will be forwarded to the Appeal Decision-maker for consideration to determine if the request meets the appeal grounds for appeal (a Review for Standing). This is not a review of the merits of the appeal, but solely a determination as to whether the request could reasonably be construed to meet the grounds and is timely filed.

If the appeal request does not provide information that meets the grounds in the procedures, the request will be denied by the Appeal Decision-maker, and the Parties and their Advisors will be simultaneously notified in writing of the denial and the rationale.

If any of the information in the appeal request meets the grounds in the Procedures, then the Appeal Decision-maker will notify all Parties and their Advisors, the Administrator, and, when appropriate, the Investigator(s) and/or the original Decision-maker.

All other Parties and their Advisors, the Administrator, and, when appropriate, the Investigator(s) and/or the Decision-maker will be provided a copy of the appeal request with the approved grounds and then be given five (5) business days to submit a response to

the portion of the appeal that was approved and involves them. The Appeal Decision-maker will forward all responses, if any, to all Parties for review and comment.

The non-appealing party (if any) may also choose to appeal at this time. If so, that appeal request will be reviewed by the Appeal Decision-maker to determine if it meets the grounds in the Procedures and will either be approved or denied. If approved, it will be forwarded to the party who initially requested an appeal, the Administrator, and the Investigator(s) and/or original Decision-maker, as necessary, who will submit their responses, if any, within five (5) business days. Any such responses will be circulated for review and comment by all Parties. If denied, the Parties and their Advisors will be notified in writing.

No party may submit any new appeal request after this time period. The Appeal Decision-maker will collect any additional information needed and all documentation regarding the approved appeal grounds, and the subsequent responses will be shared with the Appeal Decision-maker, who will promptly render a decision.

Appeal Determination Process

In most circumstances, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Appeal Decision-maker will deliberate as soon as is practicable and discuss the merits of the appeal.

Appeal decisions are to be deferential to the original determination, making changes to the Finding/Final Determination only when there is clear error and to the sanction(s)/responsive action(s) only if there is a compelling justification to do so. All decisions are made by majority vote and apply the preponderance of the evidence standard of evidence.

An appeal is not an opportunity for the Appeal Decision-maker to substitute their judgment for that of the original Decision-maker merely because they disagree with the Finding and/or sanction(s).

The Appeal Decision-maker may consult with the Administrator and/or legal counsel on questions of procedure or rationale, for clarification, if needed. The Administrator will maintain documentation of all such consultations.

Appeal Outcome

An appeal may be granted or denied. Appeals that are granted should normally be remanded (or partially remanded) to the original Investigator(s) and/or Decision-maker with corrective instructions for reconsideration. In rare circumstances where an error cannot be

cured by the original Investigator(s) and/or Decision-maker or the Administrator (as in cases of bias), the Appeal Decision-maker may order a new investigation and/or a new hearing with new Pool members serving in the Investigator and Decision-maker roles.

A notice of appeal outcome letter will be sent to all Parties simultaneously, or without significant time delay between notifications. The appeal outcome letter will specify the Finding on each appeal ground, any specific instructions for remand or reconsideration, all sanction(s) that may result which Bowie State University is permitted to share according to federal or state law, and the rationale supporting the essential Findings to the extent Bowie State University is permitted to share under federal or state law.

Written notification may be delivered by one or more of the following methods: in person or emailed to the Parties' Bowie State University-issued email or other approved account. Once emailed or received in person, the appeal outcome will be presumptively delivered.

Once an appeal is decided, the outcome is final and constitutes the Final Determination; further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case of a new determination). When appeals result in no change to the finding or sanction, that decision is final. When an appeal results in a new Finding or sanction, that Finding or sanction can be appealed one final time on the grounds listed above and in accordance with the Procedures.

If a remand results in a new Finding or sanction that is different from the original Finding or sanction, that new Finding or sanction can be appealed, once, on any of the available appeal grounds.

Sanction Status During the Appeal

Any sanctions imposed as a result of the Final Determination are stayed (i.e., not implemented) during the appeal process, and supportive measures may be maintained or reinstated until the appeal determination is made.

If any of the sanctions are to be implemented immediately post-determination, but pre-appeal, then the interim suspension procedures (detailed above) for a show cause meeting on the justification for doing so must be permitted within two (2) business days of implementation.

17. Long-Term Remedies/Actions

Following the conclusion of the Administrative Resolution Process, and in addition to any sanctions implemented or Informal Resolution terms, the Administrator may implement

additional long-term remedies or actions with respect to the Parties and/or Bowie State University community that are intended to stop the Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct, remedy the effects, and prevent its recurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Referral to the Employee Assistance Program
- Course and registration adjustments, such as retroactive withdrawals
- Community education
- Permanent alteration of housing assignments
- Permanent alteration of work arrangements for Employees
- Provision of campus safety escorts
- Climate surveys
- Policy modification and/or training
- Provision of transportation assistance
- Implementation of long-term contact limitations between the Parties
- Implementation of adjustments to academic deadlines, course schedules, etc.

At the Administrator's discretion, the Parties may be provided certain long-term support or measures even if no Policy violation is found.

When no Policy violation is found, the Administrator will address any remedies Bowie State University owes the Respondent to ensure no effective denial of educational access.

Bowie State University will maintain the confidentiality of any long-term remedies/actions/measures, provided confidentiality does not impair Bowie State University's ability to provide these services.

18. Failure to Comply with Sanctions and/or Responsive Actions

All Respondents are expected to comply with the assigned sanctions, responsive actions, corrective actions, and/or Informal Resolution terms within the timeframe specified by the final Decision-maker, including the Appeal Decision-maker or the Informal Resolution agreement.

Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional sanction(s)/action(s), including suspension, expulsion, and/or termination from Bowie State University.

Supervisors are expected to enforce completion of sanctions/responsive actions for their Employees.

A suspension imposed for non-compliance with sanctions will only be lifted when compliance is achieved to the Administrator's satisfaction.

19. Recordkeeping

In implementing the Policy and Procedures, the Administrator will maintain records of all allegations, investigations, and Resolutions, indefinitely, or as required by federal or state law or institutional policy.

20. Statement of the Rights of the Parties (See Appendix)

21. Disability Accommodations

Bowie State University is committed to providing reasonable accommodations and support to qualified Students, Employees, or others with disabilities to ensure equal access to the Bowie State University's Resolution Process.

Anyone needing such accommodations or support should contact the Administrator, who will work with Disability Support Services or another qualified office, as appropriate, to review the request and, in consultation with the person requesting the accommodation, determine which accommodations are appropriate and necessary for full process participation.

22. Other Support

Bowie State University will address other reasonable requests for support for the Parties and witnesses, including:

- Language services/Interpreters
- Access and training regarding the use of technology throughout the resolution process
- Other support as deemed reasonable and necessary to facilitate participation in a resolution process