



Title IX Policy on Sex Discrimination, Sexual Harassment, and Equal Educational Opportunity

Section 1. Purpose

URBE University is committed to fostering a safe, respectful, equitable, and inclusive educational and employment environment in which all members of the University community are treated with dignity and respect. The University prohibits discrimination on the basis of sex and is dedicated to providing educational programs, activities, employment opportunities, and campus services free from sex discrimination, sexual harassment, sexual violence, and retaliation.

This policy establishes the University's procedures for preventing, reporting, investigating, and resolving allegations of conduct prohibited by Title IX of the Education Amendments of 1972 and other applicable federal and state laws. The policy is intended to ensure that all reports are addressed promptly, fairly, impartially, and with appropriate supportive measures designed to preserve equal access to the University's educational programs and activities.

Section 2. Policy Statement

URBE University does not discriminate on the basis of sex in any education program or activity that it operates. This prohibition extends to admissions, recruitment, employment, compensation, financial aid, academic programs, athletics, student services, housing, and all other educational or employment activities conducted by the University.

- Sex discrimination
- Sex-based harassment
- Sexual harassment
- Sexual assault
- Dating violence
- Domestic violence
- Stalking
- Sexual exploitation
- Retaliation against individuals who report misconduct or participate in a Title IX process
- Any other conduct prohibited by applicable law

Section 3. Statement of Equal Opportunity

URBE University provides equal educational and employment opportunities without regard to race, color, religion, national origin, ancestry, age, disability, sex, pregnancy or related conditions, sexual orientation, gender identity, gender expression, genetic information,



marital status, veteran status, or any other classification protected by applicable federal, state, or local law.

The University is committed to maintaining an educational environment that promotes mutual respect, academic freedom, professionalism, and equal opportunity for all members of the University community.

Section 4. Scope

This policy applies to students, faculty, staff, administrators, applicants, contractors, volunteers, visitors, and other participants in URBE University educational programs and activities. It applies to conduct occurring on campus, during University-sponsored activities, through University technology resources, and in circumstances where the University has jurisdiction under applicable law.

Part 2: Definitions, Administration, Jurisdiction, and Prohibited Conduct

Section 5. Definitions

- **Complainant:** An individual alleged to have experienced conduct prohibited by this policy.
- **Respondent:** An individual alleged to have engaged in conduct prohibited by this policy.
- **Advisor:** A person selected by a party to provide support and guidance during the resolution process.
- **Supportive Measures:** Individualized, non-disciplinary services reasonably available to preserve or restore equal access to University programs.
- **Education Program or Activity:** Locations, events, or circumstances over which URBE University exercises substantial control consistent with applicable law.
- **Preponderance of the Evidence:** The standard of proof requiring that it is more likely than not that a policy violation occurred.

Section 6. Title IX Coordinator

URBE University shall designate a Title IX Coordinator to oversee institutional compliance with Title IX, receive reports, coordinate supportive measures, oversee investigations, maintain required records, coordinate training, and monitor implementation of this policy. The Coordinator shall act impartially and free from conflicts of interest.



Complaints or notice of alleged policy violations, or inquiries about or concerns regarding this policy and procedures, may be made internally to:

Arelis Varela

Title IX Coordinator

Email: Arelis.varela@urbeuniversity.edu

Phone: (844) 744-8723

Section 7. Jurisdiction

This policy applies to conduct occurring within URBE University's education programs or activities and in other circumstances where applicable law authorizes University action. It applies to on-campus conduct, University-sponsored activities, University technology resources, and qualifying off-campus conduct that substantially affects the University community or equal access to education.

Section 8. Prohibited Conduct

- Sex discrimination.
- Sex-based harassment and hostile environment harassment.
- Quid pro quo harassment.
- Sexual assault.
- Dating violence.
- Domestic violence.
- Stalking.
- Sexual exploitation.
- Retaliation against any individual exercising rights under this policy.
- Interference with an investigation or resolution process.

The University will take prompt and appropriate action to stop prohibited conduct, prevent its recurrence, and remedy its effects when a policy violation is substantiated.

Section 9. Retaliation

Retaliation against any person for reporting concerns, requesting supportive measures, participating in an investigation, serving as a witness, or otherwise exercising rights under this policy is prohibited. Alleged retaliation will be investigated independently and may result in disciplinary action.



Part 3: Reporting, Supportive Measures, and Initial Response

Section 10. Reporting Options

Any student, employee, applicant, contractor, volunteer, or visitor may report conduct prohibited by this policy regardless of whether the conduct is believed to constitute a criminal offense. Reports may be made in person, by telephone, by email, through an online reporting form, or by any other reporting method established by URBE University.

Reports should be submitted as soon as reasonably possible; however, there is no time limit for reporting alleged violations. Delayed reporting may affect the University's ability to gather evidence but will not, by itself, prevent the University from responding.

Section 11. Mandatory Reporters

Unless designated as a confidential resource, University employees who become aware of possible sex discrimination or sex-based harassment in the course of their employment are expected to promptly notify the Title IX Coordinator. Mandatory reporters should share known information while respecting the privacy of the individuals involved.

Employees will receive annual training regarding their reporting obligations and how to connect individuals with available resources.

Section 12. Confidential Resources

The University recognizes that some individuals may wish to seek confidential assistance before deciding whether to submit a report. To the extent permitted by law, confidential resources may include licensed mental health professionals, licensed medical providers, clergy acting within their professional role, or other confidential resources identified by the University.

Confidential resources generally will not disclose personally identifying information without permission except when required by law or where there is an imminent threat to health or safety.

Section 13. Supportive Measures

Upon receiving a report, the Title IX Coordinator will promptly evaluate whether supportive measures are appropriate. Supportive measures are individualized, non-disciplinary, and non-punitive services offered without fee or charge when reasonably available.

- Academic adjustments or extensions.
- Changes to class, work, or examination schedules.
- Mutual no-contact directives.
- Campus safety planning.
- Counseling or community referrals.



- Changes in employment or work assignments when appropriate.
- Leaves of absence when appropriate.
- Other measures reasonably designed to preserve equal access to University programs.

Section 14. Emergency Removal and Administrative Leave

When an individualized safety and risk assessment determines that an immediate threat to the physical health or safety of any person exists, the University may implement an emergency removal or other interim action consistent with applicable law. Individuals subject to an emergency removal will be provided notice of the action and an opportunity to challenge the decision as required by University procedures.

Section 15. Initial Assessment

After receiving a report, the Title IX Coordinator will conduct an initial assessment to determine the nature of the allegations, applicable University policies, available supportive measures, and the appropriate resolution process. The Coordinator may consult with other University officials as necessary while protecting privacy to the greatest extent practicable.

If the allegations fall outside the scope of this policy, the matter may be referred to another applicable University policy or office for review.

Part 4: Formal Complaint and Investigation Procedures

Section 16. Formal Complaint

A complainant, or the Title IX Coordinator when authorized by applicable law, may initiate the formal grievance process by submitting a written complaint alleging conduct prohibited by this policy. The complaint should identify the parties, describe the alleged conduct, and provide sufficient information to permit an initial assessment.

Upon receipt of a formal complaint, the University will provide written notice to the parties describing the allegations, applicable policies, available resources, and procedural rights.

Section 17. Dismissal or Referral

The Title IX Coordinator may dismiss or refer allegations when they fall outside the scope of this policy, cannot reasonably be investigated, have been withdrawn when permitted, or are more appropriately addressed under another University policy. A dismissal under this policy does not prevent the University from responding under another applicable code or policy.

Section 18. Informal Resolution

When appropriate and voluntarily accepted by all participating parties, the University may offer an informal resolution process. Informal resolution may include facilitated dialogue,



educational interventions, agreed remedies, or other restorative approaches consistent with applicable law.

Participation is voluntary. Any party may end the informal resolution process before a final agreement is reached and request a formal investigation unless prohibited by law.

Section 19. Investigation Process

Investigations will be prompt, equitable, impartial, and conducted by trained investigators without actual bias or conflicts of interest.

- Interview the complainant, respondent, and relevant witnesses.
- Collect documentary, electronic, photographic, and other relevant evidence.
- Provide each party an equal opportunity to identify witnesses and submit relevant information.
- Maintain reasonable confidentiality while conducting a thorough investigation.
- Prepare a written investigative report summarizing relevant evidence and findings.

Section 20. Rights of the Parties

- To receive written notice of the allegations.
- To be treated with dignity and fairness.
- To present relevant evidence and witnesses.
- To review evidence as permitted by University procedures.
- To have an advisor of their choice present during meetings where permitted.
- To receive written notice of the outcome and any appeal rights.

Section 21. Advisors

Each party may be accompanied by an advisor of the party's choice, including an attorney where permitted. Advisors may provide support and guidance throughout the process in accordance with University procedures. The University may establish reasonable expectations regarding advisor participation to ensure an orderly process.

Section 22. Evidence Review

Before a determination is made, each party will have a reasonable opportunity to review relevant evidence gathered during the investigation and submit a written response. Investigators will consider timely responses before finalizing the investigative report.

Part 5: Hearings, Determinations, Sanctions, and Appeals

Section 23. Hearings

When required by applicable law or University procedures, a hearing may be conducted by an impartial decision-maker or hearing panel. Hearings will provide each party a



meaningful opportunity to be heard, present relevant evidence, and respond to information considered by the decision-maker. The University may establish reasonable rules of decorum and participation. The University may provide a live hearing as part of the Title IX grievance process when appropriate and consistent with applicable Title IX regulations. If a live hearing is conducted, each party may be accompanied by an advisor of their choice, and any cross-examination will be conducted by the parties' advisors, not by the parties themselves. The Decision-Maker will determine the relevance of questions before they are answered, consistent with applicable law

Section 24. Determinations

Following the conclusion of the investigation or hearing, the designated decision-maker will evaluate all relevant evidence using the applicable standard of proof. Written determinations will include the allegations considered, findings of fact, policy conclusions, rationale, any sanctions imposed, remedies provided where appropriate, and information regarding appeal rights.

Section 25. Standard of Evidence

Unless otherwise required by applicable law, URBE University will apply the preponderance of the evidence standard when determining whether a violation of this policy occurred.

Section 26. Sanctions and Remedies

When a respondent is found responsible for violating this policy, the University may impose sanctions designed to stop the misconduct, prevent its recurrence, and remedy its effects.

- Educational or developmental interventions.
- Written warning or reprimand.
- Probation or behavioral agreement.
- Restrictions on participation in University activities.
- No-contact directives.
- Suspension or expulsion for students.
- Corrective action up to and including termination of employment for employees.
- Other sanctions reasonably appropriate to the circumstances.

The University may also provide remedies to restore or preserve equal access to educational or employment opportunities for affected individuals.

Section 27. Appeals

Either party may appeal a dismissal or determination on one or more of the following grounds:

- Procedural irregularity that materially affected the outcome.



- New evidence that was not reasonably available at the time of the determination.
- Actual conflict of interest or bias that materially affected the outcome.

Appeals must be submitted in writing within the timeframe established by the University. An impartial appeal decision-maker who was not previously involved in the matter will review the appeal and issue a written decision. The appeal decision is final unless otherwise required by law.

Part 6: Administration, Compliance, and Appendices

Section 28. Pregnancy and Related Conditions

URBE University will not discriminate against any student or employee on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, lactation, recovery from childbirth, or related medical conditions. The University will provide reasonable modifications and other supportive measures consistent with applicable law.

Section 29. Recordkeeping

The University will maintain records of reports, investigations, determinations, supportive measures, training, and other documentation required by applicable federal and state law. Records will be retained in accordance with the University's records retention schedule.

Section 30. Education and Training

URBE University will provide periodic training to employees with responsibilities under this policy. Training will address Title IX requirements, impartial investigations, supportive measures, trauma-informed practices where appropriate, retaliation prevention, and applicable University procedures.

Section 31. Clery Act Coordination

When applicable, the University will coordinate its response with responsibilities under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. This policy does not limit any reporting obligations required under the Clery Act or other applicable law.

Section 32. False Statements

Knowingly providing false information or intentionally submitting false allegations may constitute a violation of University policy and may result in disciplinary action. A determination that allegations are not substantiated does not, by itself, establish that a report was made in bad faith.



Section 33. Policy Review

This policy will be reviewed periodically and may be revised to maintain compliance with changes in federal or state law, regulations, guidance, or institutional needs. The University reserves the right to amend this policy at any time.

Section 34. Office for Civil Rights

Individuals may file complaints with the U.S. Department of Education, Office for Civil Rights (OCR), in addition to or instead of using the University's internal process. Current OCR contact information will be published on the University's website and in official notices.

Appendix A – Reporting Options

- Report directly to the Title IX Coordinator.
- Report to Campus Security or designated University officials.
- Report to local law enforcement when criminal conduct is suspected.
- Submit reports using any University reporting method identified on the University's website.

Appendix B – Examples of Supportive Measures

- Academic accommodations.
- Workplace modifications.
- No-contact directives.
- Counseling referrals.
- Safety planning.
- Schedule adjustments.
- Leaves of absence when appropriate.

Appendix C – Policy Acknowledgment

Students and employees are responsible for becoming familiar with this policy and complying with its requirements. The University may require acknowledgment of receipt through orientation, annual training, or other institutional processes.

Document Control

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