

Title VI Anti-Discrimination Policy and Services for People with Limited English Proficiency (LEP)

California Institute of Advanced Management (the “University” or “CIAM”) is committed to compliance with Title VI of the Civil Rights Act of 1964, as amended.

The University does not discriminate on the basis of race, color, or national origin, and prohibits such discrimination in any program or activity receiving federal financial assistance that it operates, as required by Title VI, including discrimination and harassment based on: an individual or group’s actual or perceived shared ancestry or ethnic characteristics, or citizenship or residency in a country with a dominant religion or distinct religious identity; and language spoken and Limited English Proficiency (“LEP”). Examples of prohibited discrimination include, but are not limited to:

- racial, ethnic, or ancestral epithets, or slurs
- how a person or group looks, dresses, or speaks if linked to ethnicity or ancestry (e.g., skin color, facial features, attire/ style of dress, accent, name, language spoken)
- potentially or allegedly inherited traits
- stereotypes about people who share certain ancestral or ethnic characteristics

The University’s Policy against discrimination in violation of Title VI applies to all students, faculty, staff, and employees. The University will investigate all complaints regardless of where the alleged conduct occurs. Conduct that does not fall under Title VI can still be addressed through the University’s other disciplinary processes.

How to Report Discrimination

Students, faculty, staff, and employees are obligated to report any incident or suspected incident of discrimination in violation of this Policy. Suspected discrimination may be reported to the following University contacts:

- **The University’s Title IX Coordinator, Deputy Coordinator, or the Director of Student Success:**

Claudia Sarabia, Title IX Coordinator
1000 S. Fremont Avenue, BLD A10, 4th Floor, Suite 10402, Alhambra, CA 91803
(626) 350-1500 x112
claudia.sarabria@ciam.edu

Melisa Valle, Deputy Title IX Coordinator and Director of Student Success
1000 S. Fremont Avenue, BLD A10, 4th Floor, Suite 10402, Alhambra, CA 91803
(626) 350-1500 x106
melissa.valle@ciam.edu

- To submit an anonymous report, contact:

- **For students:** [Student Success Feedback Box – Fill out form](#)
- **For employees:** [HR Feedback Box](#)

Reporting to the Department of Education Office for Civil Rights

Anyone who believes there has been an act of discrimination on the basis of race, color or national origin, against any person or group, in a program or activity that receives Department of Education financial assistance, may file a complaint with the Department of Education Office for Civil Rights under Title VI.

U.S. Department of Education Office for Civil Rights

Lyndon Baines Johnson Department of Education Bldg
400 Maryland Avenue, SW
Washington, DC 20202-1100
800-421-3481
OCR@ed.gov

Retaliation Prohibited

CIAM prohibits retaliation, including but not limited to making any threatening communication by verbal, written and/or electronic means, against any individual who reports and/or provides any information concerning suspected discrimination. Any student or employee found engaging in retaliation will be subject to disciplinary action up to and including suspension, expulsion, and/or termination of employment.

Investigative Procedure

After receiving a complaint, CIAM will promptly send written notice to both the complainant and the respondent(s) of the allegations, including information regarding supportive measures available to them.

In recognition that a wide spectrum of behaviors can constitute violations of the University's Title VI Anti-Discrimination Policy, the Title IX Coordinator may resolve reports informally and appropriately, based on the circumstances.

Formal Investigative Process

The investigation generally includes interviews with the complainant and respondent (if available) and, interviews with other witnesses as needed. The University will seek the identification and location of witnesses not identified by the parties and a review of relevant documents as appropriate. The investigator will send a written notice of the interview date, time, and location, name of participant(s), and purpose of the interview to the parties and witnesses, and any identified party advisor, in sufficient time for the party to prepare and participate.

During the investigation, the complainant and respondent will be provided an opportunity to meet with the investigator, submit evidence, identify witnesses who may have relevant information, and propose questions for the investigator to ask the other party and witnesses. The investigator has discretion to determine which witnesses to interview and what questions to ask, and may decline to ask questions that are, for example, repetitive, harassing or not relevant to whether the reported violation(s) occurred.

The investigator will independently gather other relevant information or evidence, including documents, photographs, communications between the parties, and other records as may be appropriate. The investigator will conduct a review of relevant documents as appropriate.

The investigation shall be completed as promptly as possible. Disclosure of facts to witnesses shall be limited to what is reasonably necessary to conduct a fair and thorough investigation.

The complainant and the respondent shall be simultaneously informed in writing of the completion of the investigation and provided with a copy of the investigative report. At least 10 days before any resolution process, the parties will be provided the investigative report that fairly summarizes relevant evidence, in electronic format or hard copy, to which the parties may respond. If the alleged complainant is deceased as a result of such crime or offence, the next of kin of such complainant shall be treated as the alleged complainant for purposes of this notice. The report shall include a statement of the allegations and issues and a summary of the evidence and information that was gathered in the investigation and deemed relevant by the investigator for purposes of determining if a Policy violation has occurred.

The report may be used as evidence in other related procedures, such as subsequent complaints, grievances and/or disciplinary actions.

Hearing Panel

After both parties have received the investigative report, a date will be set for a hearing to allow both parties to respond to the evidence gathered and for a Hearing Panel to determine if a Policy violation has occurred. The University will provide written notification to the complainant and respondent of the hearing date and procedures. The complainant and respondent will be provided at least 10 business days' notice of the hearing date from the date that the investigative report was provided to the parties.

The Hearing Panel is a fact-finding committee comprised of individuals trained or experienced in Title VI discrimination. Depending on the complexity of the issues, a Hearing Panel may have a single adjudicator or a panel of 3. The individuals who serve as panelists will be selected by the Title VI Coordinator, or other designated official.

The Hearing Panel will have for its review, the initial complaint, the respondent's response and any cross- complaints, all witness statements written or recorded, and any evidence preserved for the hearing in the form of the investigative report. The Hearing Panel will be chaired by a person who is not the investigator nor the Title VI Coordinator.

Hearing

The Hearing will occur either in person, or in a synchronous distance technology format enabling participants simultaneously to see and hear each other, at the discretion of the University. At the request of either party, the Title VI Coordinator must provide for the live hearing to occur with the parties located in separate rooms with technology enabling the decision-maker(s) and parties to simultaneously see and hear the party or the witness answering questions. An audio or video recording and transcript of the hearing will be made and will be made available to both parties for inspection and review. The complainant and respondent(s) will be provided the same opportunity to present fact and expert witnesses and other supporting and exculpatory evidence.

Determination

At the conclusion of the Hearing, the Hearing Panel members will consider all information presented at the Hearing and determine if a Policy violation has occurred. The Hearing Panel Chair will develop a written determination of responsibility that includes:

- A description of the specific behavior that is potentially considered a violation of the University's Title VI Anti-Discrimination Policy
- A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held
- A finding of fact supporting the determination
- Conclusions regarding the application of the University's Title VI Anti-Discrimination Policy to the facts.
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility
- Any disciplinary sanctions the University imposes on the respondent, and whether remedies designed to restore or preserve equal access to the recipient's education program or activity will be provided by the recipient to the complainant. If the alleged complainant is deceased as a result of such crime or offense, the next of kin of such complainant shall be treated as the alleged complainant for purposes of this notice.
- The University's procedures and permissible bases for the complainant and respondent to appeal.

Student Sanctions

The range of disciplinary sanctions that may be imposed upon a student responsible for a violation of this Policy, either singly or in combination, are:

1. Disciplinary Warning: This written action is taken when the individual's conduct or involvement merits an official admonition. The student is warned that further misconduct may result in more severe disciplinary action.
2. Disciplinary Probation: A form of reprimand that is fitting for the type of violation or repeated violations as designated for a certain period of time by the hearing officer. The student may, if it is deemed appropriate, represent the University in activities and hold office in student organizations during the time stipulated as probationary. The student

is notified that further infractions of any University regulation may result in more stringent restriction being placed on his/her actions.

3. **Interim Suspension:** The Director of Student Success may suspend a student for an interim period pending full disciplinary proceedings whenever there is evidence that the continued presence of the student on the campus poses a substantial threat to the safety or well-being of any person or persons, University property, or the property of others. An interim suspension may become effective immediately without prior notice. A student suspended on an interim basis will be given an opportunity to appear personally before a hearing officer within 10 or fewer calendar days from the effective date of the interim suspension. During an interim suspension, the student will be barred from all or part of the University's premises. Any student under interim suspension who returns to campus from which he/she is barred without written permission from the Director of Student Success will be subject to dismissal from the University and arrested for trespassing.
4. **Suspension:** This sanction is one of involuntary separation of the student from the University for a designated period of time. After this period of time, the student is eligible to return. The Director of Student Success /or designee may establish additional requirements, which must be fulfilled to his/her satisfaction, prior to reinstatement. Permanent notation of suspension will appear on the student's transcript and academic history. The student shall not participate in any University-sponsored activity and may be barred from University premises during suspension.
5. **Conduct Dismissal:** This sanction by Director of Student Success /or designee is one of involuntary and permanent separation from the University. Notice of permanent dismissal will appear on the student's academic history and transcript. The student will also be barred from University activities and premises. A student is not considered to be in good standing for purposes of admission to the University while under a sanction of suspension or expulsion, or while his or her admission or re-admission has been qualified.
6. **Administrative Hold and Withholding a Degree:** The University may place an administrative hold on registration transactions and release of records and transcripts of a student who has been sent written notice of a pending investigation or disciplinary case concerning that student and may withhold awarding a degree otherwise earned until the completion of the process set forth herein, including the completion of all sanctions imposed.

Employee and Third-Party Sanctions

Any employee found responsible for violating this or other University policies will receive a sanction in accordance with University policies and procedures. The discipline may include, but is not limited to:

1. Unpaid leave from work during the investigation,
2. Unpaid suspension from work after a violation has been found,
3. A Performance Improvement Plan, or
4. Termination of employment

Any third party (visitor, guest, contractor, subcontractor, vendor, partner, or business

affiliate) found responsible for violating this Policy will receive a sanction ranging from a written warning to being banned from any University property, activities, and/or programs.

Services for People with Limited English Proficiency (LEP)

Pursuant to Title VI, the University maintains an LEP Plan, which outlines how the University will:

- Identify an LEP person in need of language assistance
- Provide language assistance to LEP persons
- Train staff to serve LEP persons
- Notify LEP persons of available language assistance services
- Monitor and update the LEP plan

The University will consider four factors when assessing language needs and determining what steps should be taken to ensure access for LEP persons. These four factors are:

- The number or proportion of LEP persons in the University's service area that may be served by the University;
- The frequency with which LEP persons come in contact with University services;
- The nature and importance of the programs and services provided by the University to the LEP population; and
- The resources available to the University for LEP outreach as well as the cost associated with that outreach.

Translation and interpretation services are available to report discrimination and harassment. Anyone needing translation or interpretation services or assistance in order to make a report or participate in any of our complaint resolution processes may request assistance by contacting:

Claudia Sarabia, Director of People Culture and Performance
1000 S. Fremont Avenue, BLD A10, 4th Floor, Suite 10402, Alhambra, CA 91803
(626) 350-1500 x112
claudia.sarabria@ciam.edu

Melisa Valle, Director of Student Success and ADA Compliance Coordinator
1000 S. Fremont Avenue, BLD A10, 4th Floor, Suite 10402, Alhambra, CA 91803
(626) 350-1500 x106
melissa.valle@ciam.edu