

NON-DISCRIMINATION POLICY

I. POLICY STATEMENT

The University is committed to providing equal opportunity and an educational environment free from any discrimination on the basis of race, color, or national origin, including actual or perceived shared ancestry or ethnic characteristics; religion; sex; disability; military status, including veteran status; age; or any other characteristic protected by U.S. federal or, as applicable, state and local law. The University adheres to U.S. federal non-discrimination laws, including, but not limited to, Title VI; Section 504 of the Rehabilitation Act of 1973; and Title IX of the Education Amendments of 1972, and applicable state and/or local laws. For matters involving sexual harassment as a form of sex discrimination, please refer to the Title IX policy or Sex-Based Misconduct and Prevention Policy.

The University forbids Prohibited Discrimination and Retaliation, as defined below. The University will take prompt action to address and remedy Prohibited Discrimination and Retaliation. The Office of Nondiscrimination and Access (ONA) oversees this Policy and the accompanying Procedures.

II. SCOPE

This Policy applies to acts of Prohibited Discrimination or Retaliation committed by a Student or a Third Party that occur within the University's Education Programs or Activities, including admissions. Acts of Prohibited Discrimination or Retaliation committed by a Colleague and/or that are related to employment that occur within the University's Education Programs or Activities are addressed by a separate policy, which is located in the [Policy Against Discrimination, Harassment and Retaliation/Victimization](#).

Any individual may make a Report to the University of Prohibited Discrimination or Retaliation committed by a Student, a Third Party or a Colleague. Procedures for reporting Prohibited Discrimination or Retaliation and/or filing a Complaint of Prohibited Discrimination or Retaliation related to this Policy are located on the [ONA Website](#).

The University's ability to take action against a Third Party may be limited and is determined by the context of the Prohibited Discrimination or Retaliation as well as the relationship between the University and the Third Party. Procedures for reporting violations by a Colleague of the Policy Against Discrimination, Harassment and Retaliation/Victimization are found within that policy and in Section VII below.

III. DEFINITIONS

Complainant means an individual reported to have experienced Prohibited Discrimination or Retaliation.

Respondent means the individual who is reported to have committed Prohibited Discrimination or Retaliation.

Education Program or Activity includes all the University's operations, locations, events, or circumstances over which the University exercised substantial control over both the Respondent and the context in which the Prohibited Discrimination or Retaliation occurs.

Prohibited Discrimination includes any form of Disparate Treatment Discrimination or Hostile Environment Discrimination.

Disparate Treatment Discrimination occurs when an individual suffers an adverse action or is treated worse than similarly situated individuals on the basis of a protected characteristic. For purposes of a disparate treatment claim, an adverse action is an action that adversely affects the terms, conditions, or benefits of the Complainant's education or other aspects of an Education Program or Activity.

Hostile Environment Discrimination constitutes unwelcome conduct directed against an individual on the basis of that individual's protected characteristic(s) that objectively is sufficiently severe, pervasive, or persistent such that it interferes with, limits, or denies that individual the ability to participate in or benefit from the University's educational programs, services, opportunities, or activities. Unwelcome conduct may include oral, written, graphic, physical, or other conduct by a Student or Third Party as well as conduct that is physically threatening or presents a physical danger. (Note--Hostile Environment Discrimination on the basis of sex is covered (and investigated) under the Title IX Policy or Sex-Based Misconduct and Prevention Policy.)

Retaliation constitutes any adverse action taken against an individual because that individual engaged in a protected activity. For purposes of retaliation, a protected activity is engaging in any process or procedure under this Policy or accompanying Procedures. For purposes of retaliation, an adverse action is any action taken against an individual that could dissuade a reasonable person from making or supporting a complaint of discrimination.

Protected Characteristics include the characteristics protected under U.S. federal and applicable state and/or local law such as, but not limited to, race, color, or national origin, including actual or perceived shared ancestry or ethnic characteristics; religion; sex; disability; military status, including veteran status; or age.

Report means notice or allegations of Prohibited Discrimination or Retaliation to the University's Nondiscrimination Coordinator/ONA Director or designee or any University official who has the authority to institute corrective measures on behalf of the University.

Complaint means a written request for ONA to address allegations of Prohibited Discrimination or Retaliation through an Informal or Formal Resolution Process as described in the Non-Discrimination Procedures.

Student means an individual who is registered or enrolled in University classes or in one of the University's degree or non-degree programs.

Third Party means an individual who is participating in or seeking to participate in the University's Education Programs or Activities.

Colleague means an individual employed by the University, either on a part-time or full-time basis.

IV. CONTACT FOR QUESTIONS ABOUT THIS POLICY & ROLE OF TITLE VI COORDINATOR/ONA DIRECTOR

The University has appointed a Nondiscrimination Coordinator/ONA Director who, along with any designees, coordinates the University's adherence to federal, state and/or local civil rights laws. The Nondiscrimination Coordinator/ONA Director is responsible for coordinating the provision of comprehensive education and training; coordinating the University's timely, thorough, and fair response, and resolution of all Reports and Complaints of Prohibited Discrimination or Retaliation under this Policy; and monitoring the effectiveness of this Policy and related Procedures, as well as education and training programs, to provide a non-discriminatory, non-harassing, and non-retaliatory University environment.

The name and contact information of the University's Nondiscrimination Coordinator/ONA Director is:

Laura Boedeker
ONA Director
Covista
HQ: 233 S. Wacker Drive, Suite 800, Chicago, IL 60606
Phone: 630-829-0233
ONA@covista.com

Concerns about the University's application of this Policy and adherence to federal laws also may be addressed to the U.S. Department of Education, Office for Civil Rights at:

U.S. Department of Education
Office for Civil Rights
400 Maryland Avenue, S.W.
Washington, D.C. 20202-1100
Telephone: 1-800-421-3481
Facsimile: 202-453-6012; TDD 1-800-877-8339
Email: OCR@ed.gov
<https://ocrcas.ed.gov/contact-ocr>

V. REPORTING RESPONSIBILITIES OF UNIVERSITY COLLEAGUES

All University Colleagues are required to report any Prohibited Discrimination or Retaliation or allegations of Prohibited Discrimination or Retaliation by Students or Third Parties under this Policy to the Nondiscrimination Coordinator/ONA Director or designee even if the

Colleague does not have the authority to institute corrective measures on behalf of the University. Corrective measures include, but are not limited to, sanctions, remedies, and supportive measures.

VI. PRIVACY

The University is committed to protecting, to the extent reasonably and legally possible, the privacy of all individuals involved in the reporting, investigation, and resolution of a Report or Complaint of Prohibited Discrimination or Retaliation under this Policy. Privacy refers to the discretion that will be exercised by the University in the course of any investigation or disciplinary processes under this Policy. Information related to a Report or Complaint of Prohibited Discrimination or Retaliation will be handled discreetly and personally identifiable information will only be shared with a limited group of University officials who need to know in order to assist in the assessment, investigation or resolution of the Report or Complaint and related issues. If the Complaint proceeds to an investigation, information may be disclosed to participants as necessary to facilitate the thoroughness and integrity of the investigation. In all such proceedings, the University will maintain the privacy of the parties to the extent reasonably possible. Certain types of policy violations are considered crimes for which the University must disclose crime statistics in its Annual Security Report. These statistical disclosures are made in a manner that does not include personally identifiable information about persons involved.

VII. REPORTS OF CONDUCT BY A COLLEAGUE VIOLATING THE POLICY AGAINST DISCRIMINATION, HARASSMENT AND RETALIATION/VICTIMIZATION

If a Student feels they have experienced or witnessed any discriminatory or retaliatory conduct based on a protected characteristic (such as race, color, religion, etc.) by a Colleague in violation of the Policy Against Discrimination, Harassment and Retaliation/Victimization, they should if comfortable, tell the Colleague to stop. Students have the right to, and should, immediately make a report of the conduct via any of these methods:

- Contact the Coaching Resource Center (“CRC”) at crc@covista.com. The CRC handles employee relations matters, including violations of policies.
- Contact AskHR at askHR@covista.com
- Contact the Office of Nondiscrimination Equity and Access at (630) 829-0233 or ONA@covista.com
- Contact Covista’s Speak Up Hotline (which allows students to submit concerns or complaints anonymously) by calling (800) 461-9330, texting (773) 904-1074, or by visiting www.speakupcovista.com

Students have the right to file complaints with the federal agency listed below. Please be advised that separate deadlines and time limitations for filing complaints with external agencies may apply. Please contact the agency listed below for more information about the applicable deadlines:

[U.S. Department of Education Office for Civil Rights](https://www.ed.gov/office-for-civil-rights)

The University forbids retaliation taken against a Student because they have engaged in a protected activity. For purposes of retaliation, a protected activity is engaging in any process or procedure under the Policy Against Discrimination, Harassment and Retaliation/Victimization. Retaliation is any action taken against an individual that could dissuade a reasonable person from making or supporting a complaint of discrimination.