

Interim Policy Prohibiting Discrimination

1. Purpose

This Interim Policy Prohibiting Discrimination (“Policy”) implements Worcester Polytechnic Institute’s (“WPI”) [Notice of Non-Discrimination](#) and applicable federal and state civil rights laws, including Title VI and Title VII of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments of 1972 (excluding sexual misconduct), and the Age Discrimination Act of 1975.

WPI is committed to fostering a community grounded in respect, equity, dignity, and belonging. These values are essential to our educational mission and to ensuring that all members of our community can fully participate, contribute, and thrive. Consistent with these commitments, WPI does not tolerate Discrimination.

Discrimination undermines our shared values and the integrity of our learning and working environment. Discrimination includes both (i) Different Treatment, such as treating an individual less favorably than others because of a protected characteristic in the provision of, or access to, a WPI program or activity, and (ii) Harassment on the basis of a protected characteristic that is sufficiently severe, pervasive, or persistent, based on the totality of the circumstances, to create a hostile environment that it denies or limits an individual’s ability to participate in or benefit from a WPI program or activity.

For the purpose of this Policy, legally protected characteristics include race, color, national origin, shared ancestry or ethnic characteristics, sex, age, religion, disability, genetic information, gender identity or expression, sexual orientation, marital or parental status, veteran status, or any other status protected by Massachusetts or federal law.

This Policy prohibits Discrimination and governs WPI’s response to reports, complaints, and other information alleging Discrimination based on a legally protected characteristic. When WPI knows or reasonably should know of possible Discrimination, WPI will take prompt and effective action reasonably calculated to end any discriminatory conduct, eliminate any hostile environment and its effects, and prevent recurrence, regardless of whether either of the resolution processes described below is initiated. Any student, employee, or community member who believes they have experienced Discrimination based on the above characteristics is encouraged to seek assistance through the processes described below.

Retaliation is prohibited. Any individual may report or file a good-faith complaint of Discrimination without fear of retaliation from WPI or the Respondent. Allegations of retaliation will be addressed under this Policy.

2. Scope and Applicability

- A. This Policy applies to all members of the WPI community, including faculty, staff, students, and third parties. If the Respondent is not affiliated with WPI, then WPI's ability to investigate and take disciplinary action may be limited. Still, WPI will take reasonable steps within its authority to support affected individuals and address any impact on the WPI community.
- B. This Policy does not apply to allegations of sexual misconduct, which are covered under WPI's [Title IX and Sexual Misconduct Policy](#).
- C. This Policy applies to all conduct occurring on or after the effective date of this Policy, August 7, 2026. For all conduct that occurred prior to this date, WPI will implement the policies or procedures applicable to that conduct at the time the conduct occurred.

3. Definitions

Advisor: Complainants and Respondents may be accompanied by one advisor of their choice at meetings and investigation interviews. An individual who may also serve as witness may not serve as an advisor. Advisors may not actively participate, speak for, or answer questions on behalf of a Complainant or Respondent. WPI does not provide or identify advisors.

Complainant: An individual who alleges that they experienced prohibited Discrimination.

Complaint: A written form, available [here](#) submitted to the Equal Opportunity and Outreach office (EOO) describing alleged discriminatory conduct with sufficient detail to provide notice to the Respondent and to permit investigation of the allegations.

Different Treatment: conduct that treats an individual or group less favorably than others because of a legally protected characteristic in the provision of, or access to, a WPI program, service, benefit, or opportunity.

Discrimination: prohibited conduct that encompasses Different Treatment and/or Harassment.

Harassment: conduct that creates a hostile environment when, based on the totality of the circumstances, it is subjectively and objectively offensive and is so severe, pervasive, or persistent that it denies or limits an individual's ability to participate in or benefit from a WPI program or activity. Harassing conduct may take many forms, including, but not limited to:

- Verbal acts such as slurs, epithets, insults, threats, or derogatory comments;
- Written or graphic statements, symbols, or images, including online or electronic communications;

- Physical acts, intimidation, or vandalism targeting individuals or groups based on a protected characteristic;
- Conduct that need not be directed at a single individual but contributes to a hostile environment for others.

A hostile environment may exist even where no individual is the intended target and may be created by the cumulative effect of multiple incidents. A single incident may be sufficiently severe to create a hostile environment depending on the nature and context of the conduct.

Investigator: The Investigator will be the Assistant Director of Equal Opportunity and Outreach or another trained individual designated by the Title VI Coordinator¹ to conduct fact-finding and make determinations regarding alleged violations of this Policy.

Investigative Complaint Process: An investigative process used to determine whether a violation of this Policy has occurred and, if so, to identify appropriate sanctions. This process includes notice, investigation, determination, and an opportunity for appeal.

Voluntary Resolution Process: An alternative to the Investigative Complaint Process that allows parties to address a concern through less formal means when an investigation is not sought or necessary. This process requires voluntary, informed agreement of both parties and approval by EOO. A Voluntary Resolution is not appropriate in all cases, including when allegations raise significant concerns about a hostile environment, broader campus impact, or institutional compliance obligations.

Report: As used in this Policy, a Report of Discrimination is any notice provided to WPI, through formal or informal channels, that reports allegedly discriminatory conduct. A Report can be made verbally or in writing.

Respondent: The individual alleged to have engaged in discriminatory conduct.

Title VI Coordinator: The individual who retains overall responsibility for ensuring WPI's compliance with Title VI and other federal and state non-discrimination laws.

Witness: Any person with information relevant to the allegations.

4. Resolution Procedures

A. Reporting and Supportive Measures

Individuals are encouraged to report Discrimination promptly so that EOO may address the concerns as soon as possible. Reports may be made by contacting [EOO](#), by submitting a Report

¹ If any individual identified by title in this Policy is unable to fulfill their responsibilities, the Title VI Coordinator or the Vice President for Talent will nominate a trained designee for that role.

through the [Bias Incident Reporting Form](#), or by filling out a [Complaint Form](#). Any individual may also contact the WPI Police Department to report incidents of Discrimination.

Upon receiving a Report or Complaint, EOO will contact the reporting party to determine the appropriate course of action, which may include filing a Complaint (if not already submitted), a Voluntary Resolution Process, an Investigative Complaint Process, supportive measures, or a combination thereof. Supportive measures and resources will be offered regardless of whether a party chooses to file a Complaint. Supportive measures may include academic, housing, or workplace accommodations, or any other interim measure, as appropriate. Supportive measures will also be made available to the Respondent once they have been notified of the allegations.

Where a Complainant requests anonymity, EOO will evaluate the request and may, where appropriate, address the issue with the Respondent in general, educational terms outside of the Voluntary Resolution Process or the Investigative Complaint Process.

B. Filing a Complaint

A Complainant seeking to initiate the Investigative Complaint Process or the Voluntary Resolution Process must submit a Complaint to EOO. EOO will conduct an initial assessment to determine whether the allegations, if true, would constitute a violation of this Policy. If not, EOO may either administratively close the matter and notify the Complainant in writing or, where appropriate, take steps to learn more about the alleged Discrimination before determining how to proceed.

The Complainant may request reconsideration of administrative closure by EOO within seven (7) business days, explaining basis of requested reconsideration and any new facts or allegations not known at the time of initial filing. EOO will promptly notify the Complainant in writing of its response to the request for reconsideration.

If no Complaint is filed but EOO is on notice of alleged discriminatory conduct that warrants an investigation, the Title VI Coordinator may file a Complaint to initiate the Investigative Complaint Process on behalf of WPI.

C. Investigative Complaint Process

1. Notice

Once EOO has determined that the allegations in the Complaint, if true, would constitute a violation of this Policy, EOO will provide written notice of the allegations to be investigated to the Complainant and Respondent and assign an Investigator.²

² If, during the course of the investigation, additional information is learned regarding a new potential violation of this Policy, a new written notice will be provided to the parties detailing the additional allegations.

2. Investigation and Determination

The Investigator will conduct a prompt, fair, and impartial investigation, providing both parties equal opportunity to present information and identify witnesses. Parties may be accompanied by an Advisor during interviews with the Investigator. Union-represented employees may request a union representative as their Advisor consistent with applicable collective bargaining agreements.

Alleged Discrimination will be evaluated under the definition – different treatment or harassment – most appropriate to the nature of the conduct and its impact. The Investigator will apply a preponderance of the evidence standard and prepare a written Preliminary Report summarizing findings of fact and a determination regarding whether the evidence demonstrates a violation of this Policy occurred. The Investigator will have forty-five (45) days to complete the investigation unless there are circumstances that prevent this from happening, in which case the parties will be notified.

The Preliminary Report will be provided to the Complainant and the Respondent for review. The parties will have ten (10) business days to submit written responses, raising any due process concerns, factual discrepancies, or other issues.

After considering the parties' responses and conducting any additional fact-finding, if appropriate, the Investigator will issue a Final Report determining whether there is a violation of this Policy. The imposition of any sanctions or remedial measures on the Respondent will be addressed separately.

The Final Report will, if appropriate, recommend any corrective measures to be taken by WPI to end any discriminatory conduct, eliminate any hostile environment and its effects, and prevent recurrence. EOO will review and, as appropriate, implement or coordinate the implementation of corrective measures directed at the WPI community or institutional practices (but not disciplinary action against the Respondent).

3. Sanctions

The Final Report will be provided to both parties and referred to the appropriate decision-maker for any sanctions or remedial action involving the Respondent. Sanctions should be proportionate to the conduct and based on the findings and conclusions set forth in the Final Report, as well as relevant WPI policies and, where applicable, collective bargaining agreements or employee handbooks.

- When the Respondent is a **student**, sanctions may include community service, counseling, disciplinary probation, removal from residence hall, suspension from the university for one or more terms, expulsion from WPI, or other appropriate measures.

- When the Respondent is a **staff or faculty member**, sanctions may include oral warning, written warning (also known as a letter of reprimand), disciplinary probation, suspension (with or without pay), termination of employment, or other appropriate measures.

In determining appropriate sanctions, the decision-maker will evaluate several factors including the nature and seriousness of the conduct, the Respondent's past record, the impact of the behavior, past treatment of similar issues, and any other mitigating or aggravating circumstances.

The appropriate decision-maker will be the Associate Dean of Students for students and the Division Head³ for non-faculty staff.⁴

For faculty Respondents only, the Final Report will be provided simultaneously to the Dean of the appropriate School ("Academic Dean") and to a three-person sanctions recommendation panel composed of three faculty members. Appointees to the panel will be drawn from incumbent members of Civil Rights Judicial Panel. The Title VI Coordinator shall act as an advisor through all parts of the sanctions deliberations process. The sole role of the panel will be to make a reasoned recommendation to the Academic Dean as to sanctions by majority vote. The recommendation should include a written evaluation of the factors outlined above as the basis for the recommended sanctions. If the three members do not agree to the recommended sanction, the panel member in the minority should explain in writing the basis for their disagreement. The panel must provide its recommendation to the Dean within ten (10) business days of receiving the Final Report.

If the Academic Dean does not concur with the recommendation of the panel, the Academic Dean will meet with the panel to discuss their reasoning for disagreement and allow panelists an opportunity to provide any additional insights that informed their decision process. After the meeting, the Academic Dean will reach a final determination on sanctions.

The investigation, determination of Policy violation, and imposition of sanctions should ordinarily be completed within ninety (90) days of the filing of a Complaint. Timeframes under this Procedure may be extended for good cause, with written notice to the parties explaining the reason for the extension.

4. Appeal

Either party may appeal the determination in the Final Report or the issuance of sanctions in writing within seven (7) business days to the Title VI Coordinator on the following grounds only:

³ Division Head means the highest Cabinet level manager of the division or department (i.e., Academic Affairs, Marketing Communications, etc.), excluding the President.

⁴ If the individual designated as a decision-maker for sanction or appeal determinations is a Respondent or Complainant in a Formal Complaint or has any other Conflict of Interest based on their role in this Procedure, then the President will appoint their designee.

- Procedural irregularity that affected the outcome of the matter (e.g. failure to consider material, relevant evidence in the decision-making process or a failure to follow this Policy);
- New, relevant evidence that was not reasonably available at the time of the initial investigation or determination that could affect the outcome of the matter;
- The Title IV Coordinator, Investigator, or decision-maker for sanctions had a conflict of interest or bias for or against an individual party, or for or against complainants or respondents in general, that affected the outcome of the matter; or
- The sanction(s) imposed varies significantly from the range of sanctions appropriate to the violation of this Policy.

The appealing party must explain in writing the grounds for the appeal. The non-appealing party will have seven (7) business days to respond in writing.⁵ For students, the appeal officer will be the Dean of Students; for faculty the appeal officer will be the Provost; and for non-faculty staff the appeal officer will be the Vice President for Talent. A written appeal decision may affirm, modify, or reverse the issues on appeal and will be issued by the appropriate appeal officer. The decision of the appeal officer is final.

Any individual who serves as an appeal officer must be excluded from any deliberation or process preceding the appeal. Appeals should ordinarily be resolved within thirty (30) business days of the filing of the appeal. Timeframes under this Procedure may be extended for good cause, with written notice to the parties explaining the reason for the extension.

D. Voluntary Resolution Process

The Voluntary Resolution Process is an alternative to the Investigative Complaint Process and may be appropriate when a Complainant does not seek an investigation and/or believes the matter can be resolved through less formal means. Participation requires the voluntary agreement of both parties to participate and approval by the EOO. Some allegations may not be appropriate for Voluntary Resolution, including matters that raise significant concerns about a hostile environment, campus-wide impact, or institutional compliance obligations.

The Complainant must submit a Complaint to EOO to initiate the process. If EOO has determined that the allegations in the Complaint, if true, would constitute a violation of this Policy, the Title VI Coordinator will contact the Complainant to discuss potential resolution options, such as mediation, facilitated dialogue, education, or other agreed-upon outcomes. If the Voluntary Resolution Process proceeds, the Title VI Coordinator will provide the Respondent with written notice of the allegations and a copy of this Procedure, including notice that Voluntary Resolution Process is voluntary.

If the parties reach agreement, the resolution will be documented in a written Voluntary Resolution Agreement signed by both parties. For institutional record keeping purposes, all

⁵ In cases where both parties appeal, each party will be afforded the opportunity to respond to the appeal filed by the other.

records of the Voluntary Resolution Agreement will be kept in the Equal Opportunity and Outreach office.

Any Agreement under the Voluntary Resolution Process should be signed within thirty (30) business days of notice to the Respondent. Timeframes under this Procedure may be extended for good cause, with written notice to the parties explaining the reason for the extension. Either party may withdraw at any time prior to resolution, or EOO may determine that Voluntary Resolution is no longer appropriate. In such cases, the Complainant may choose to initiate the Investigative Complaint Process.

F. Conflict of Interest

Parties are expected to promptly raise any actual or perceived conflicts of interest to EOO so that they can be appropriately reviewed. EOO will evaluate the concern, taking into account whether the conflict could reasonably call into question impartiality or fairness, and will determine appropriate next steps. If there is a conflict of interest with a member of EOO, the Vice President for Talent will determine appropriate actions and may designate another trained employee to serve.

G. Confidentiality

Information will be handled with discretion and shared only on a need-to-know basis. WPI will make reasonable efforts to preserve privacy. Information may be disclosed as necessary to conduct a fair process, address institutional obligations, and implement appropriate actions in student or employment matters. All participants in the review process under this procedure are expected to maintain confidentiality to protect the privacy of all involved. However, this expectation of confidentiality does not prohibit parties or witnesses from seeking support, reporting concerns, participating in legal or administrative proceedings, or otherwise exercising rights protected by law.

H. No Retaliation

Retaliation is prohibited. Retaliation is any adverse action, intimidation, threat, or coercion against a person because they reported Discrimination, participated in a complaint or investigation, or otherwise exercised rights protected by this Policy or federal/state law. Retaliation can take many forms but includes any action in response to the report, complaint, or investigation that would discourage a reasonable person from speaking up or participating in an investigation. Allegations of retaliation related to participation in this process may be investigated under this Procedure and may result in disciplinary action.

I. Interpretation

This Procedure will be interpreted consistent with applicable federal and state law.

J. Additional Reporting Options

The use of WPI's internal reporting or complaint processes, including this Procedure, is not required in order to file a complaint with a government agency, such as the Office of Civil Rights at the U.S. Department of Education ([OCR](#)) or the Massachusetts Commission Against Discrimination ([MCAD](#)). Individuals may pursue external remedies independently or concurrently.

Any individual may also contact the WPI Police Department to report incidents of Discrimination. [WPI Police](#) can assist with criminal and other matters.

Policy Sponsor: Title VI Coordinator

Responsible Department: Equal Opportunity and Outreach Office

Effective Date: August 7, 2026.