**University Policies** 

#### 1

### **UNIVERSITY POLICIES**

## University and Campus Policies University System Policies

Phone: 303-860-5711

Website: https://www.cu.edu/ope (https://www.cu.edu/ope/)

The University of Colorado System Office of Policy and Efficiency (https://www.cu.edu/ope/) - oversees the president's university-wide administrative policymaking process; facilitates the development, review, approval and maintenance of university-wide administrative policy statements (APSs); and acts as the official repository and point-of-contact regarding APSs. OPE also supports the formal review of regent laws and policies.

#### Policies include:

- · Intercampus Enrollment and Tuition
- · Adopting Standards for Intercampus Transfer of Credits
- · Sexual Misconduct, Intimate Partner Violence, and Stalking
- · Digital Accessibility

### **Campus Policies**

Phone: 303-315-2102 Email: policy@ucdenver.edu

Website: http://www.ucdenver.edu/policies (http://www.ucdenver.edu/

policies/)

The Campus Policy Office resides in the Provost Office. This office oversees all development, coordination, management, rescissions and archives for all CU Denver and CU Anschutz campus policies.

Policies include those listed below:

### **Alcoholic Beverages at Official Functions**

University of Colorado Denver | Anschutz Medical Campus official functions that include the serving of alcohol require the completion of an "Event with Alcohol" form and prior approval by the designated school/college/unit officer (Dean, Associate Vice Chancellor, or higher). Purchase of alcohol for personal consumption at official functions is allowed only if the source of the University funds is (1) gifts restricted for entertainment, donor cultivation, or personnel recruitment purposes and (2) approved by the Deputy Controller.

Sales of alcohol at University events may only be made at licensed establishments. Pooling resources to purchase alcohol constitutes sale of alcohol without a license and is therefore not allowed on University property or at University events.

To ensure proper management of an activity where alcohol is provided at a pre-approved official function, the following rules include but are not limited to:

1. All persons being served alcoholic beverages must be at least 21 years of age and have proper identification for proof of age.

- An Event Manager will be present and will monitor the alcoholic beverage service area. The Event Manager/Sponsor is a responsible and accountable individual who will be present for the entire event.
- Food items and non-alcoholic beverages will be available. These items must be available at no cost, in the same general location, and of such a variety as to make them attractive alternatives to the alcoholic beverages being provided.
- 4. Persons checking ID's will have knowledge of proper identification techniques and are over 21 years of age.
- Persons dispensing alcohol will monitor individual's consumption and not continue to dispense to persons that show signs of impairment.
- Alcoholic beverages will not be available for individuals to pour their own. There will be no open or unattended kegs, containers, or bottles.
- 7. If the event lasts more than two hours, alcohol will not be served during the last hour. For events lasting less than two hours, service will discontinue at least 30 minutes prior to the scheduled end of the event.
- The entrance/exit access area will be monitored so as not to allow persons to carry in or take alcoholic beverages from the consumption area.
- Designated drivers or other means of alternate transportation will be available.
- Campus Police are notified in advance for on-campus events, as applicable.

For a complete listing of University rules for managing an official function with alcohol, please see the following policies or contact the campus Deputy Controller.

Campus Administrative Policy 3050 (https://www.ucdenver.edu/docs/librariesprovider284/default-document-library/3000-general-admission/3050---alcohol-service.pdf)

CU System University Risk Management Page (https://www.cu.edu/risk/)

#### **Alcohol and Drug Policies**

Full policy language is also available here: https://www.ucdenver.edu/docs/librariesprovider37/default-document-library/2023-final-anschutz-asr.pdf

As an academic community, The University of Colorado Denver | Anschutz Medical Campus is committed to providing an environment in which learning and scholarship can flourish. The possession or use of illegal drugs, or the abuse of those which may otherwise be legally possessed, seriously affects the University environment, as well as the individual potential of our students and employees. The University enforces state laws and related University policies, including those prohibiting the following activities on campus:

- A. Providing alcoholic beverages to individuals under 21 or possession or consumption of alcoholic beverages by individuals under 21.
- B. Distribution, possession, or use of illegal drugs or controlled substances.
- C. Possession of firearms or other dangerous weapons.

The abuse of alcohol and other drugs by students, regardless of age and of location (on-campus or off-campus), is prohibited by the Student Code of Conduct and Ethics and Professionalism codes on the University of Colorado Denver | Anschutz Medical Campus. This includes on- or off-campus activities sponsored by the University, such as officially sanctioned field trips, student-sponsored social activities, club sports travel, as well as activities of a student organization recognized by the institution. Professional meetings attended by employees and institution-sponsored activities abroad also fall under this code of conduct. The University can, and will, impose disciplinary sanctions for violations. Students are also subject to city ordinances and state and federal laws. A separate policy addresses violations by University staff.

The University strongly encourages students and staff members to voluntarily obtain assistance for dependency or abuse problem before such behavior results in an arrest and/or disciplinary referral, which might result in their separation from the institution.

The use of, or addiction to, alcohol, marijuana, or controlled substances is not considered an excuse for violations of the Student Code of Conduct or staff expectations, and will not be a mitigating factor in the application of appropriate disciplinary sanctions for such violations.

Help is available both on campus and within the community for students and staff members who are dependent on, or who abuse the use of alcohol or other drugs. Services are available at the Student and Community Counseling Center, (303-315-7270) for CU Denver Campus Students, Student Mental Health Services (303-724-4716) for CU Anschutz students, and The Colorado State Employee Assistance Program (303-866-4314) for CU Denver | Anschutz employees. These resources as well as other professional agencies will maintain the confidentiality of persons seeking help for personal dependency and will not report them to institutional or state authorities. The CU Denver Health Promotion and Engagement Coordinator, (303)315-4009, provides educational and awareness programming, information, and assistance for CU Denver students. The Director of Student Health Promotion at the CU Anschutz Medical Campus, (303)724-7674), provides this programming for CU Anschutz students.

#### **Student Sanctions**

Underage students confronted by the institution for the consumption of alcohol will face disciplinary sanctions including, but not limited to, a warning, bystander class, online class, face-to-face class, reflection paper, personal success plan, counseling referral, alcohol assessment, disciplinary probation, disciplinary probation with loss of good standing, suspension, and expulsion.

Students whose use of alcohol or drugs results in harm or the threat of harm to themselves or others, or to property, regardless of the location of the incident, may face disciplinary action by the university up to and including expulsion.

Testing for the presence of illegal substances may be a condition of any probationary status imposed by the university for violations of drug-related provisions of this policy.

Students on the CU Anschutz campus will be sanctioned according to their individual school or college's professionalism/ethics or disciplinary codes. Any student with a positive result, as described above, may face disciplinary action by the university up to and including expulsion. CU Anschutz students must comply with their program, school, or college and/or licensing agency's policies and protocols pertaining to drug testing.

- · School of Dental Medicine
- · School of Medicine
- College of Nursing (https://nursing.cuanschutz.edu/student-life/ student-handbooks/)
- Colorado School of Public Health (https://www.ucdenver.edu/docs/ librariesprovider151/default-document-library/coloradosph-honorcode.pdf?sfvrsn=5d211eb9\_4)
- Skaggs School of Pharmacy & Pharmaceutical Sciences (https://pharmacy.cuanschutz.edu/docs/librariesprovider195/ current-student-documents/pharmd/student-policies/ student\_ethics\_and\_conduct\_code.pdf?sfvrsn=ffc808b9\_4)

As members of the university community, students are also subject to city ordinances and to state and federal law. Arrest and prosecution for alleged violations of criminal law or city ordinances may result from the same incident for which the university imposes disciplinary sanctions.

#### Colorado Marijuana Laws

Persons must be at least 21 years of age to buy, possess or use retail marijuana. It is illegal to give or sell retail marijuana to minors. Adults 21 and older can purchase and possess up to 1 ounce of retail marijuana at a time.

Medical marijuana requires a state red card, which can only be obtained by Colorado residents with a recommendation from a doctor that a patient suffers from a debilitating medical condition that may benefit from medical marijuana. Medical marijuana patients can obtain marijuana from a licensed center, a primary caregiver or self-grow.

Retail marijuana is intended for private, personal use. Such use is only legal in certain locations not open or accessible to the public. Marijuana may not be consumed openly or publicly. This includes but is not limited to areas accessible to the public such as transportation facilities, amusement/sporting/music schools, venues, parks, playgrounds, sidewalks and roads and outdoor and rooftop cafes. It is also illegal to smoke at indoor-but-public locations like bars, restaurants, and common areas in buildings.

It is illegal to drive under the influence of marijuana and it can result in a DUI, just like alcohol. Anyone with 5 nanograms or more of delta 9tetrahydrocannabinol (known as THC) per milliliter in whole blood (CRS 42-4-1301) while driving can be arrested for DUI. The consequences of DUI are dependent on the driver, but they can include fines, jail time and a revoked license.

#### **Counseling and Treatment**

Short-term alcohol and other drug counseling is available at Student Mental Health Services 303-7244716 for CU Anschutz students.

Campus services may refer students to other treatment programs for more intensive treatment if deemed appropriate. CU Anschutz and the State of Colorado Employee Assistance Program offer employees additional education and counseling, as well as appropriate referrals. Below is an abbreviated list of services and treatment centers. The list includes a summary of the agency name, services offered at various levels of treatment, and contact information.

### **Animals on Campus**

The University allows individuals to bring animals on Campus property or include them as part of University-sponsored events, programs, or activities in accordance with federal and state laws and in other situations subject to the rules outlined in this Policy. At the same time,

the University recognizes the health and safety risks potentially created by unrestrained animals on Campus and at University-sponsored events, programs, or activities. This Policy sets forth roles and responsibilities of employees, students, visitors, and applicants for admission or employment with the University who have the need to bring animals on Campus or include them as part of University-sponsored events, programs, or activities.

#### **Definitions**

#### 1. Animal Definitions

- a. Emotional Support Animal: an animal that is not a service animal as they are not specially trained to perform a task and are not covered by the Americans with Disabilities Act, as amended ("ADA") relative to public accommodations, but they are covered by applicable law relative to housing considerations to allow a person with a disability an equal opportunity to use and enjoy a dwelling. To legally be considered an Emotional Support Animal, the animal needs to be prescribed by a licensed metal health professional to a person with a disabling mental illness.
- b. <u>Pet</u>: an animal kept for ordinary use and companionship. A Pet is not considered a Service Animal, Service Animal in Training, Emotional Support Animal, Therapy Animal, or Research Animal.
- c. Research Animal: any animal that is covered under a University of Colorado Animal Care and Use Committee (IACUC) approved protocol. Research Animals are not Pets, Service Animals, Therapy Animals, or Emotional Support Animals unless part of a study approved by the IACUC. Their presence on campus is controlled by the Office of Laboratory Animal Research; the terms of this Policy do not apply to those animals.
- d. <u>Service Animal</u>: a dog, and in some specific instances a miniature horse, that has been individually trained to do work or perform tasks for an individual with a disability. The task(s) performed by the animal must be directly related to the person's disability.
- e. <u>Service Animal in Training</u>: an animal engaged in training to become a Service Animal. All below references to Service Animals refers also to Service Animals in Training.
- f. <u>Therapy Animal</u>: a trained animal that accompanies a licensed counselor or therapist to treatment sessions in order to deliver individualized animal-assisted therapy interventions.

#### 2. Additional Definitions

- a. <u>ADA Coordinator</u>: an employee of the University responsible for providing information to and facilitating the reasonable accommodation process, pursuant to the ADA for employees and applicants for employment.
- b. <u>Campus</u>: includes all University-owned, leased, or controlled locations.
- c. <u>Disability</u>: with respect to an individual, a physical or mental impairment that substantially limits one or more major life activities of such an individual, a record of such an impairment, or being regarded as having such an
- impairment. The impairment may be permanent, chronic, or progressive. An impairment that is episodic or in remission is considered a disability under the ADA if the condition would substantially limit a major life activity when active.

- d. <u>Disability Services Director</u>: an employee of the University whose purpose is to provide assistance to students with disabilities, including the provision of reasonable accommodations.
- e. <u>Handler</u>: person without a disability who is training a Service Animal.
- f. <u>Partner</u>: person with a disability using a Service Animal. For purposes of this policy, this can be either a student or an employee. g. <u>Public Facilities</u>: any property, including buildings, grounds, and equipment controlled by the University and open to the public. h. <u>Qualified Individual with a Disability</u>: an individual with a disability who possesses the requisite skills, education, experience, and training for a position, and who can perform, with or without reasonable accommodation, the essential functions required for the position the individual desires or holds.
- i. <u>Reasonable Accommodation</u>: a modification or adjustment to the job application process or the work environment enabling a qualified individual with a disability to be eligible for a position, perform the essential functions of
- a position, or enjoy the same benefits and privileges of employment as are enjoyed by similarly situated employees without disabilities. The University provides reasonable accommodations to qualified individuals with a disability in order for them to enjoy equal benefits and privileges of work and to enable performance of the essential functions specified in the job description.

#### **Responsibilities and Procedures**

#### 1. Service Animal Qualifications

A Service Animal must be individually trained to do work or perform tasks for the benefit of an Individual with a Disability. The work or tasks performed must be directly related to the disability. Service Animals must be accompanied by a Partner at all times and the Partner must maintain control of the animal at all times.

The Service Animal must be current on vaccinations.

In situations where it is not obvious that the animal is a Service Animal, the University may ask:

- a. "Is the animal a service animal required because of a disability?";
   and
- b. "What work or task has the animal been trained to perform?"

#### 2. Service Animal Care and Control Requirements

The care and supervision of a Service Animal is the responsibility of the Service Animal's Partner. Service Animals must be harnessed, leashed, or tethered, unless the device interferes with the Service Animal's work or the individual's disability prevents using these devices. In that instance, the Partner must maintain control of the animal at all times through voice, signal, or other effective controls.

As noted in the ADA, the Partner is responsible for caring for and supervising the Service Animal, which includes toileting, feeding, grooming and veterinary care. If a Service Animal is sick, that Service Animal should not be brought to Campus or University-sponsored events, programs, or activities during the duration of that sickness. The Partner is responsible for the cleanup of all animal waste; the University may designate animal waste areas.

The owner or individual with a disability who has control or custody of a Service Animal or the trainer of a Service Animal is liable for any damage to persons, premises, or facilities caused by the Service Animal or Service Animal in Training.

#### 3. Removal of Service Animals from Campus or University-Sponsored event, program, or activity

A University official, including, but not limited to, an event coordinator and/or a member of the Animals on Campus Committee, may require the removal of a Service Animal from campus or from a University-sponsored event, program or

activity if it is: (1) out of control (i.e. biting or attempting to bite), vocalizing, running around, jumping at or on other animals or people or engaging in other aggressive or disruptive behavior; or (2) the animal is not housebroken.

Circumstances leading to removal will be reviewed on a case-by-case basis. In the event the University properly excludes a Service Animal, it must provide the Handler the opportunity to participate in the service, program, or activity without

having the Service Animal present. Once a particular animal has been excluded, it may not return to campus. If an excluded animal reappears on campus, the animal's Partner will be referred, as applicable, to either a student conduct official or human resources for possible disciplinary action.

#### 4. Employees and Service Animals on Campus

present to their supervisor.

Qualified employees with a disability who require a Service Animal as a Reasonable Accommodation, as defined by the ADA, in a University office or other facility not open to the general public must submit a request that they be permitted

to bring their Service Animal to their place of employment. The ADA Coordinator may review this request with the Employee's supervisor. The employee must contact the ADA Coordinator at least two weeks in advance of the Service Animal coming on campus or other University facility or as early as is reasonably practicable. After engaging in the interactive process on a case-by-case basis with the disabled employee, the ADA Coordinator may approve the requested accommodation and will provide documentation for the employee to

Employees who do not themselves have a disability that would benefit from the use of a Service Animal but wish to train an animal to be a Service Animal for other individuals must submit a request to the relevant campus ADA Coordinator.

These requests will be considered on a case-by-case basis with supervisor input, but not analyzed under the Americans with Disabilities Act.

Employees wishing to bring Service Animals and Service Animals in Training to campus must initially provide Service Animal and Service Animal in Training health and vaccination records, including but not limited to negative fecal exam

results, to the ADA Coordinator and maintain such records, updated on an annual basis, that can be shown upon demand to the ADA Coordinator or a University official enforcing this Policy.

#### 5. Students and Service Animals on Campus

A student with a disability, who requires a Service Animal in an academic setting, is encouraged to meet with the Office of Disability Resources and Services. After registration, including verification of the disability and Service Animal, is complete, the disability staff will provide documentation for the student to present to their faculty. In addition, the disability staff are available to assist with providing access to additional accommodations, resources, information, and advocacy.

#### 6. Visitors and Service Animals on Campus

Visitors with Service Animals may access all public facilities, with the exception of areas where this Policy specifically prohibits Service Animals.

#### 7. Extent of and Restrictions on Service Animal Access

The University may prohibit or otherwise restrict the access of Service Animals in certain University facilities due to health or safety restrictions or concerns, where the presence of a Service Animal may put the Service Animal at risk, compromise the integrity of certain research, or otherwise fundamentally alter a program or activity. Each request for access will be evaluated on a case-by-case basis by the ADA Coordinator or Disability Services Director.

Service Animals may be restricted from the following areas:

- · Food preparation areas;
- · Research laboratories;
- · University Animal Care Facilities
- Mechanical rooms or custodial closets such as boiler rooms, facility equipment rooms, electrical closets, elevator control rooms, and similar spaces;
- · Areas where personal protective clothing or equipment are necessary;
- Areas where there is a danger to the Service Animal such as classrooms, wet laboratories or wood/metal/machine shops, where there are physical chemical or other hazards on the floor, in the air, or protruding from a surface, that could cause harm to the animal.

#### 8. Conflicting Disabilities

Individuals with medical issues aggravated due to the presence of other's Service Animals should contact the Office of Disability Resources and Services if the Partner involved is a student or the ADA Coordinator if the Partner involved is an employee. The Office of Disability Resources and Services or the ADA Coordinator will resolve any conflict in a timely manner and will consider the conflicting needs and/or accommodations of all individuals involved.

#### **Service Animals in Training on Campus**

A trainer of a Service Animal, or an individual with a disability accompanied by an animal that is being trained to be a Service Animal, may have the right to be accompanied by the Service Animal in Training at the University. The presence of the Service Animal in Training may not interfere with the trainer's responsibilities to the University.

Pursuant to above, Employees requesting to bring a Service Animal in Training to the workplace must speak with the ADA Coordinator prior to bringing the animal to campus.

## Emotional Support Animals are not Permitted in University Facilities

**Students** requesting to keep an Emotional Support Animal in their University dormitory, must work with the facility to determine under what circumstances the animal is allowed.

Therapy Animals are permitted in University public facilities to the extent that they are accompanied by a trained therapist or counselor and are being used solely for the purpose of individualized or group assisted animal therapy ("AAT"). The trained therapist or counselor must request permission from the University Committee prior to bringing the animal on campus and follow all campus requirements regarding third party use of facilities as well as certain minimum requirements relating to vaccination and insurance as determined by the Committee. The rules outlined above

regarding Service Animals apply to Therapy Animals. Therapy Animals must:

- Have completed a training program, acceptable to the University, prior to engaging in any therapy services.
- Be seen by a veterinarian, the cost of which is paid by the animal's owner, once per year and provide to the University evidence of current vaccinations and a negative fecal exam.
- Be secured in an appropriate crate or enclosed space/office at all times that the animal cannot be physically present with the Handler.

The Therapist or Counselor must:

- 1. Accept complete financial responsibility for the animal.
- Obtain informed consent from each patient who will be seen by the Therapy Animal.
- 3. Maintain control of the animal at all times.
- 4. Develop a plan to remove the animal whenever the circumstances of the therapy session require removal.
- 5. Require that the patient wash their hands after coming into contact with the Therapy Animal.
- Attend to the needs of the animal including, but not limited to, allowing the Therapy Animal regular breaks from the sessions, taking the animal outside to designated areas to eliminate, and providing water when necessary.
- Keep the animal away from campus if it shows signs of illness until cleared by a veterinarian.

In addition to the prohibited locations in section above, the Therapy Animal may be further restricted by the clinical sites of practice.

"Puppy De-stress" type events must meet the criteria for therapy animals or otherwise be approved in writing at least two weeks prior to a scheduled event by the Committee.

#### **Contacting the Animals on Campus Committee**

Persons with concerns, about specific Service Animals they see on campus, may inform the Animals on Campus Committee at: aoc@ucdenver.edu.

Therapists and Counselors wishing to incorporate Therapy Animals into their practice and departments that wish to sponsor "Puppy De-Stress" events must inform the University by contacting the Animals on Campus Committee at aoc@ucdenver.edu. The request will then be forwarded to the Animals on Campus Committee who will review and meet with the Therapist or Counselor to outline additional requirements, if any.

#### **ADA Resources**

If you are a student at the CU Denver Campus and need to make an application for accommodations or need information regarding the ADA and Service Animals Policy, contact the Office of Disability Resources and Services at Disability Services Coordinator at (303) 315-3510 or by mail to CB 118 P.O. 173364 Denver, CO 80217-3364.

If you are a student at the CU Anschutz Medical Campus and need to make an application for accommodations or need information regarding the ADA and Service Animals Policy, contact the Office of Disability Resources at (303) 724-5640 or by mail at Strauss Health Sciences Library - 1409A1, 12950 East Montview Boulevard, Aurora, CO 80045.

If you are an employee or prospective employee and need to make an application for accommodations or need information regarding the

ADA and Service Animals Policy, contact the ADA Coordinator at (303) 315-2700 or mail to P.O. Box 173364, Campus Box A005/130, Denver, CO 80217-3364.

#### Other Applicable Policies

University students and employees who are located off of University property and not engaged in a University-sponsored program or activity must adhere to the policies and procedures regarding animals established by the third party location.

#### **Anti-Violence Policy**

The University of Colorado strives to maintain an environment free of intimidating, threatening, or violent behavior, including but not limited to, verbal and/or physical aggression, attack, threats, harassment, intimidation, or other disruptive behavior in any form or by any media, which causes or could cause a reasonable person to fear physical harm by an individual(s) or group(s) against any person(s) and/or property. This policy is not intended to regulate the content of an individual's speech but is instead meant to address the manner in which individuals behave. This policy applies to academic, administrative, research, and service departments, programs, activities and/or services wherever CU Denver Campus and CU Anschutz Medical Campus business is conducted, including extended studies and international locations.

#### **Policy Statement**

University employees, students, affiliates, and visitors who engage in prohibited behavior shall be held accountable under University policy and local, state, and federal law. Any employee or student who commits prohibited behavior may be subject to disciplinary action, up to and including, dismissal or expulsion, as well as arrest and prosecution. Any visitor or affiliate who commits or threatens to commit prohibited behavior may be subject to exclusion from campus, arrest, prosecution, termination of their business relationship with the University, and/or any other appropriate action.

Examples of prohibited behaviors may include any of the following behaviors that have the effect of causing a reasonable person to be in fear of harm to themselves or others, but are not limited to: (1) disturbing the peace by violent, tumultuous, offensive, or obstreperous conduct; (2) engaging in intimidating, threatening, or hostile statements or actions that unreasonably disrupts the work or learning environment, causes undue emotional distress to another, or creates a reasonable fear of injury to a person; (3) making gestures that convey threats; (4) or using fighting words; (5) uttering ethnic, racial, or sexual epithets; (6) making threatening comments about, or references to, violent events and/ or behaviors; (7) waving fists, pushing, stalking, bullying, hazing; (8) destroying personal property in the workplace; (9) destroying university property; (10) physically assaulting or attacking persons or property; (11) throwing objects at persons

or property; (12) engaging in vandalism, arson, or sabotage.

With regard to firearms, explosives and other dangerous or illegal weapons on or within any University of Colorado campus, leased building or areas where such possession interferes with the learning and working environment of the University of Colorado, please refer to Regent Policy 14.I, Weapons Control, and the forthcoming Campus Policy on Weapons Control.

#### **Reporting Procedures**

#### 1. Emergency or Life-Threatening Situations

In the case of an emergency or life-threatening situation, immediately call 911. A call to 911 will go to the appropriate Campus, City, or County law enforcement agency. A call to 911 from any campus telephone automatically registers the location of the telephone on which the 911 call was placed, even if no words are spoken.

If calling from a cell phone on the Anschutz Medical Campus, please contact University Police at (303) 724-4444 or use Safe Zone to report the emergency situation. If calling from a cell phone on the Auraria Campus, please call Auraria Campus Police at (303) 556-3271. The AHEC Text-A-Tip number can also be a reporting avenue: 720-593-TIPS (8477).

#### 2. Non-Emergency Situations

In all other situations, notify the Faculty and Staff Threat Assessment (FaST) team at (303) 315-0182 or the CARE Team at (303) 724-8488 at CU Anschutz Medical Campus or (303) 315-7306 for CU Denver Campus. The FaST Team will engage other departments as appropriate, including Human Resources.

#### 3. Responsibility to Report

Anyone witnessing or receiving a report of prohibited behavior, or unauthorized possession, display or use of any unauthorized weapon shall immediately notify the appropriate authority, as listed above. Any supervisor who fails to make such a report shall be subject to corrective/disciplinary action.

The Workplace Violence Incident Report Form will be used by Human Resources and University Police to document each alleged violation of this policy. Copies of the form are available on the Human Resources website.

#### 4. Non-Retaliation and Confidentiality

To the extent possible, no adverse action will be taken against anyone for truthfully reporting a violation of this policy. Further, every effort will be made to protect the confidentiality of all personal identifying information provided in reports of violations of this policy.

## Disposition of Allegations; FAST Team and CARE Team Role and Teams' Training

#### 1. Disposition

All reports of threatened, potential, or actual violent behavior or unauthorized possession, display or use of any weapon will undergo inquiry and be verified, documented, and confronted.

#### 2. CARE Team

When it is alleged that a student has violated this Policy by engaging in threatening, potential, or actual violent behavior or unauthorized possession, display or use of any weapon, the CARE Team will investigate such reports for threat assessment, if necessary. The CARE Team will then refer recommended actions to the student's school or college for potential sanctions as part of the relevant school or college's student conduct process. The following units will assign

individuals to serve as representatives to the CARE Team:

- Case Management
- · Campus Student Affairs Office and/or Conduct Office

- Student Affairs for one School or College on a rotating basis (CU Anschutz Medical Campus)
- · University / AHEC Police
- · University Counsel
- · Office of Equity
- University Housing & Dining (CU Denver Campus)

#### 3. FaST Team

HR will investigate reports regarding prohibited behavior or possession, display, or use of any unauthorized weapon, and coordinate the University's response to violent behavior. When determined to be necessary by Human Resources, or University Police if the situation involves a Human Resources employee, a report will be referred to the FaST Team for threat assessment. The following units will assign individuals to serve as representatives to the FaST Team:

- · Human Resources
- · University Police
- · University Counsel
- · Office of Equity
- · Auraria Police
- · A licensed psychiatrist from the Department of Psychiatry
- Faculty with scholarly and applied expertise in workplace behavioral issues

#### 4. Training

All members of the FaST Team and the CARE Team will participate in training provided by the National Behavioral Intervention Team Association (NABITA).

The University encourages the training of all employees, students, and affiliates in this area. Please contact Human Resources for more information.

#### **Bathroom and Locker Room Policy**

The University of Colorado Anschutz Medical Campus ("university") has adopted this policy for all students, employees, and visitors to ensure equal access to restrooms and/or locker rooms regardless of their sex, gender identity, or gender expression.

#### **Policy Statement**

#### 1. Equal Access to Restroom and/or Locker Room Facilities

- a. The university strives to create and sustain a campus environment that supports and values all members of our community. One aspect of creating a supportive and respectful environment is providing access to safe restroom and/or locker room facilities.
- b. Students, staff, faculty, and visitors shall be permitted to utilize the multi-stall or single-stall restroom or locker room that corresponds with their gender identity and/or gender expression. Students, staff, faculty, and visitors shall not be required to use the restroom and/or locker room facilities that correspond to their sex.
- c. Questioning the presence of or harassing an individual who enters a restroom or locker room because of their perceived sex, gender expression or gender identity could be a violation of the university's Nondiscrimination policy.

d. The university has posted the list and map of available all-gender or single stall restroom facilities online (https://map.concept3d.com/?s/). Facilities Management is responsible to provide newly identified all-gender restrooms to the Office of Equity (OE). OE will review and update the list, as necessary.

#### 2. Whom to Contact

- a. Employees or students with questions regarding the university's policy or concerns regarding discrimination based on sex, gender identity, or gender expression, may contact the Office of Equity at 303-315-2567 or via email at equity@ucdenver.edu. To report concerns of discrimination, you can submit an incident report form: https://cm.maxient.com/reportingform.php?UnivofColoradoDenver&layout\_id=2.
- b. If rooms are unclean or need to be restocked with supplies, contact Facilities Services at 303-724-1777.
- c. For general support and advocacy on the Anschutz Medical Campus, please contact the Office of Access and Engagement at oae@cuanschutz.edu.

#### **Definitions**

- Restroom: A facility that includes at least one toilet and sink, but no bathing fixture.
- Locker Room: A facility that includes at least one area where an individual could disrobe to change clothing. This facility may or may not include a bathing fixture, toilet, or sink.
- Gender Identity: Refers to an innate sense of one's own gender, or an internal sense of who one is.
   See https://www.ucdenver.edu/offices/equity/ university-policies-procedures/discrimination-and-harassment/ protected-characteristics for more information.
- Gender Expression: Refers to the external appearance of one's gender, usually expressed through behavior, clothing, haircut or voice, and which may or may not confirm to socially defined behavior and characteristics typically associated with being masculine or feminine. See https://www.ucdenver.edu/offices/equity/ university-policies-procedures/discrimination-and-harassment/ protected-characteristics for more information.
- Sex: Refers to the assigned and/or classification of an infant at birth as male, female, or intersex based on reproductive organs. See https://www.ucdenver.edu/offices/equity/ university-policies-procedures/discrimination-and-harassment/ protected-characteristics for more information.
- All-Gender Restroom: A Multi-stall restroom designated for use by any individual(s) regardless of their sex, gender Identity, or gender expression. Allows for access for several users at one time.
- Single-Stall Restroom: Restroom designed to accommodate one individual at a time, typically equipped with an external lock, to prevent access while occupied.
- Multi-Stall Restroom: Restroom designed to accommodate multiple individuals at a time, typically not equipped with an external lock.
- Students: Includes, but is not limited to, all students, including part-time, full-time, degree-seeking, non-degree seeking, undergraduate, or graduate students enrolled at CU Anschutz.
- Employee: Includes, but is not limited to, all staff, faculty, residents, fellows, including part-time, full-time and temporary appointments.

### **Campus Closures/Delays**

This policy establishes physical campus closure and related staffing expectations during inclement weather and other emergencies, and is applicable to all faculty, classified staff, university staff and student employees at the University of Colorado Anschutz Medical Campus ("CU Anschutz"). Circumstances which may require that CU Anschutz facilities/campus be closed include but are not limited to: inclement weather such as snow, ice, tornadoes and other weather-related conditions, flood, fire, chemical spills, air pollution advisories and other similar natural disasters; and, acts of violent crime, terrorism and other major threats to personal health or safety.

#### **Policy Statement**

- 1. The decision to close the physical campus is vested with the CU Anschutz Chancellor or designee(s). With guidance from weather reports and forecasts, law enforcement agencies and other emergency personnel, the decision to close a campus will be made under conditions that pose serious health and/or safety hazards to campus constituents. The primary criterion for closing the campuses will be the current or changing conditions of the campuses and the immediate environment. No individual school or department may formally announce an independent closing decision. Closing considerations may include but are not limited to:
  - Ability of employees to access the parking lots and buildings by 6:00 a.m.
  - If the sidewalks are clear and safe for use by 6:00 a.m.
  - · Status of the roads cleared and negotiable by 6:00 a.m.
  - · State and or local warnings in place
  - · The number of consecutive days the campus has been closed
  - · Status of functioning infrastructure and services:
    - · Domestic water
    - Steam
    - Chilled water
    - · Telephones
    - Network
    - Electrical
    - Circulator (Anschutz Medical Campus)
    - Public transportation
    - · Public safety first responders
  - · Conditions surrounding the campus or facilities
  - Ability of essential personnel to arrive at work and stay for an extended period of time
  - · Long-term outlook or weather forecast
  - Forecast for length of time the campus/facility can be kept open
  - · Whether affiliate entities are impacted and/or open
  - · Whether State and local agencies are open

CU Anschutz has the authority to make campus closure decisions independent of city and state officials and is exempt from the State Inclement Weather Policy as established by the Governor for state employees.

#### a. CU Anschutz Medical Campus

The CU Anschutz Chancellor or designee(s), usually the Executive Vice Chancellor for Administration and Finance, have authority over the Anschutz Medical Campus, and off-campus work locations

associated primarily with this campus. This applies to the locations in the Denver Metro area. Individuals in off-site locations outside of a radius of 15 miles of Aurora will follow the closure decision by the facility in which they are practicing.

University of Colorado Hospital Authority (UCH), Children's Hospital Colorado (CHCO) and other affiliates at CU Anschutz have separate operating policies that affect their staff. However, every effort will be made to coordinate closure information with hospital partners and other affiliates, particularly to ensure appropriate medical care coverage. Individuals required to work in those clinical facilities must follow the requirements and closure status of those locations.

#### **b. Off-Campus Activities**

Closures in the case of inclement weather also include the cancellation of off-campus activities. However, independent policies and procedures for closing may be determined for off-campus activities by the college, school, location, or department supervising and directing the impacted off-campus activities.

#### 2. Communicating Closure Decisions

The Office of Communications at CU Anschutz is designated by the Chancellor to notify the news media of closures and update campus channels. CU Anschutz Police will notify the campus community through the CU Anschutz Alerts system. Weather closures and emergency notification decisions will be made as early as possible to facilitate the most effective communication. Multiple communication avenues will be used whenever possible, to ensure broad access to information. The primary sources of closure will include:

- a. Local television and radio stations and their websites
- b. CU Anschutz campus website: http://www.cuanschutz.edu and social media channels
- c. CU Anschutz Alerts system: text message, email message, website, and social media channel (coordinated through University Police)
- d. CU Anschutz emergency information number. 877-INFO-070 (877-4636070) (coordinated through University Police)

#### 3. Staffing Management

a. Essential Employees - Certain employees, by nature of their assignments, may be designated as 'essential,' e.g., certain police personnel, safety, medical, information technology, administrative and critical facilities personnel. Appointing authorities of applicable units usually identify these employees in advance and notify them of their status in writing. Specific incidents or circumstances may, however, require the immediate determination and notification that an employee must report during a campus closure. Since such essential employees are often expected to report to work during closures, they are required to be aware of the reporting and communication plan for their work area.

Essential employees with parking privileges should park in their normal parking spaces. If unable, essential employees need to park in spaces that are accessible, without using handicap spaces. They will need to watch for special notices or communications regarding parking and other special situations as they report to work.

Essential employees who do not report to work as assigned will be required to use vacation leave or have their pay docked for that time period. Such absences will also be considered in the evaluation of the employees' performance, including possible corrective or disciplinary actions.

b. Employees not designated as Essential (Staff and 12-month Faculty)

Non-essential employees who are regularly scheduled to work must stay away from campus during closures. It is expected that they will work remotely to the greatest extent possible during physical campus closures. If unable to perform their duties remotely or need to care for children, family members, or have other commitments, they can work with their supervisor to take vacation leave to accommodate needs.

- c. Given that closures only occur in cases of extreme weather or other safety concerns, the campus will not be prepared to accommodate the health and safety of non-essential employees.
- d. Employees who are on pre-approved leave (vacation or sick) at the time of a closure are required to use their earned leave during the closure.

### **Campus Weapons Control**

Board of Regents Policy 14.I recognizes that the unauthorized possession of, knives firearms, explosives, and dangerous or illegal weapons on or within any University of Colorado campus, leased building, or areas where such possession interferes with the learning and working environment of the University of Colorado is inconsistent with the academic mission of the university. Further, Board of Regents Law 14.B.3 allows the chancellors of each campus to enact rules lawfully regulating the possession of firearms, explosives, and other weapons for their respective campus.

#### **Policy Statement**

Both the Denver Campus and the Anschutz Medical Campus prohibit the unauthorized possession of "Banned Items" as defined in this policy, including firearms, knives, explosives, and dangerous or illegal weapons on any property owned, leased, or controlled by the Denver Campus or the Anschutz Medical Campus.

The only permitted exceptions to this prohibition are:

- The carrying of a concealed weapon in accordance with the requirements of the Colorado concealed carry laws.
- The carrying of a firearm or other weapon by any member of the armed forces of the United States, or Colorado National Guard while acting in their official capacity and in conformance with general or specific military orders, and
- 3. A peace officer, as described in § 16-2.5-101, C.R.S., when carrying a weapon in conformance with the policy of their employing agency as provided in § 16-2.5-101(2).
- 4. A law enforcement officer, agent, or employee of the United States, when lawfully carrying a weapon in conformance with the policy of their employing agency.
- 5. The possession of a Banned Item by individuals who have written permission from the chief of police for those campuses which have such an officer or from the chancellor after consultation with the chief of police. Requests for exemption from this policy shall be submitted to the Chief of Police and will be considered based upon the educational or business need for possession of the otherwise prohibited weapon.

In the event that an individual found to be in possession of a Banned Item, or is found to have intentionally or recklessly used or possessed an item that does not meet the definition of a Banned Item in a way that would intimidate, harass, injure or otherwise interfere with the

learning and working environment of the university, that individual may be excluded from the university campus, leased building, or other area under the control of the university. For employees or students, the result may include termination or expulsion from the University. Such a decision will be made in collaboration with Human Resources (for employees) and Student Affairs (for students). In the case of the Denver Campus, officials shall make every effort to work with the Auraria Higher Education Center officials to obtain a reciprocal ban relating to AHEC property. This section is not intended to limit the discretion of the University to institute summary suspension proceedings.

This policy is intended to clearly state expected standards of personal conduct for employees, students, and visitors.

#### **Definitions**

A "Banned Item" shall include any of the following:

- Firearms of any size or type of construction and ammunition, which
  may include but are not limited to: gas or air guns, including BB,
  pellet, and paint ball guns; firearm silencers; machine guns; short
  shotguns; short rifles;
- Any knife with a blade over 3.5 inches in length, including hunting and fishing knives;
- Ballistic, gravity and switchblade knives, regardless of the length of the blade;
- 4. Bows and arrows, and cross-bows;
- Blackjacks, bludgeons, batons, nunchaku, throwing stars, and metallic knuckles;
- 6. Swords, pikes, lances and spears;
- 7. Fireworks, bombs, grenades and torches;
- 8. Shields, poles, or other objects that may or are being used to strike, block, push or corral another person; and
- A harmless instrumentality, or replica, designed to look like a firearm, explosive, or other weapon.

#### **Email Account**

Email is an official means for communication within CU Anschutz. Therefore, CU Anschutz has the right to send communications to students/staff/faculty via email and the right to expect that those communications will be received and read in a timely fashion. Students, faculty, and staff are expected to check their official email address on a frequent and consistent basis in order to stay current with university communications. Students, faculty, and staff have the responsibility to recognize that certain communications may be time critical. University e-mail is provided to support University activities and excessive personal use should be avoided.

The University of Colorado Denver | Anschutz Medical Campus ("the university") considers information technology a strategic asset that is relied upon by faculty, staff, and students to accomplish the university mission. As such, the use of electronic mail (email) and the protection of information contained within the university email system is critical to the success of the university. This policy applies to all users of the university email systems, including students, faculty, and staff. Email is one of the most powerful and commonly used communication tools within the university, but there are many risks associated with communicating via email. Email communications should not be considered to be confidential exchanges of information, as they can be viewed by anyone unless properly protected. Email messages can also be intercepted, stored, read, modified, and/or forwarded to other recipients. In addition to these

security concerns, casual comments in email may be misinterpreted and lead to contractual or other legal issues for staff and faculty.

#### **Email Policy**

- Purpose: University email services are provided to support the academic, business and research missions of the university. All emails processed by the university information technology systems and networks are considered to be the property of the university.
- Responsibility: Email users are responsible for avoiding practices
  that could compromise information security. This includes (but is not
  be limited to) preventing unauthorized access to email accounts by
  properly protecting login credentials, not storing passwords on publicaccess systems and proper use of encryption services for sending
  private data.
- 3. Email as Official Communication: Email is an official means of communication within the university. Therefore, the university has the right to send communications to students, faculty and staff via email, and the right to expect that those communications will be received and read in a timely fashion.
- 4. Expectations: Students, faculty, and staff are expected to check their official email address on a frequent and consistent basis in order to stay current with university communications. Students, faculty, and staff have the responsibility to recognize that certain communications may be time critical. University e-mail is provided to support University activities and excessive personal use should be avoided.
- 5. Encryption: Data that is classified as Private (as defined in the CU System Policy Glossary, see references, below) must be encrypted when being sent to recipients outside of the university and its affiliates' networks (i.e. when sent across the Internet or other public networks.). Such emails must be encrypted through an IT Servicesmanaged encryption system.
- Out of Office Messages: Do not unnecessarily disclose potentially sensitive information in "out of office" or "automated reply" messages (reference Email Security Guidelines, below).
- 7. Privacy: IT Services reserves the right to scan email traffic for malicious software, spam and unencrypted private or restricted information. While the university encourages the use of electronic mail and respects the privacy of users, all emails traversing university computing systems and networks are subject to automated scanning and monitoring. Emails may also be quarantined and/or reviewed by authorized university employees.
- Interception/Modification: Except when specifically authorized by university management or where necessary for IT system administration purposes, employees must not intercept, divert, modify, or destroy another person's email communications or messages.
- 9. Personal Use of University Email Accounts: University email services may be used for incidental personal purposes provided that such use does not: (i) directly or indirectly interfere with the operation of computing facilities or electronic mail services# (ii) burden the university email system with noticeable incremental cost# or (iii) interfere with the email user's employment or other obligations to the university. Email messages arising from such personal use are also considered to be the property of the university with no expectation of privacy. Email users should assess the implications of this presumption in their decision to use university electronic mail services for personal purposes.
- Personal Email Accounts: Use appropriate discretion when using Gmail, Hotmail, Yahoo or any similar external/third-party email

services for university business or academic purposes. Do not forward or auto-forward university email that may contain private or restricted data (e.g. PHI, SSNs, or FERPA-protected data) to external/third party email systems or store such email data on insecure mobile devices.

- 11. Distribution lists and Listservs: Exchange/Outlook email distribution lists should ONLY be used for email communications being sent to less than 150 recipients. Larger volumes of messages should be processed through IT Services managed listservs or other IT Servicesapproved email tools. IT Services provides free listserv services for faculty & staff.
- Campus-wide Distribution: Only the Chancellor, the President, or their designee may send email communications to the entirety of the university. This includes faculty and/or staff and/or student populations.
- 13. Restrictions: Do NOT use email:
  - To create, send, forward or store emails with messages or attachments that are illegal or violate any other campus or University policy.
  - b. To commit the university to a third party, for example through purchase or sales contracts, job offers or price quotations, unless you are explicitly authorized by management to do so (principally applies to staff within the Procurement Service Center and Human Resources).
  - c. In ways that could be interpreted as representing or being statements on behalf of the university, unless you are a spokesperson explicitly authorized by university management to make such statements.
  - d. To send a message from anyone else's email account or in their name (including the use of false or spoofed 'From' addresses). If authorized by their manager, administrative assistant or other office personnel may send email on the manager's behalf but should sign such email in their own name per procuration ('for and on behalf of') the manager.

Campus Administrative Policy 5011: Email (https://www.ucdenver.edu/docs/librariesprovider284/default-document-library/5000-information-technology/5011—email.pdf)

#### **FERPA**

The Family Education Rights and Privacy Act of 1974 (FERPA) deals specifically with the education records of students, affording them certain rights with respect to those records. For purposes of definition, education records are those records which are:

- 1. Directly related to a student and
- 2. Maintained by an institution or a party acting for the institution.

FERPA gives students who reach the age of 18 or who enroll in a post secondary institution the right to inspect and review their own education records. Furthermore, the right to request amendment of records and to have some control over the disclosure of personally identifiable information from these records, shift from the parent to the students at this time.

FERPA applies to the education records of persons who are or have been in attendance in post secondary institutions, including students in cooperative and correspondence study programs, video conference, satellite, internet or other electronic forms. FERPA does not apply to records of applicants for admission who are denied acceptance or, if accepted, do not attend an institution. CU Anschutz considers

"enrollment" to begin on the first day of classes of the semester in which a student initially enrolls. FERPA rights end at death, but records may be released at the university's discretion.

#### **Notice of Student Rights**

Students at the University of Colorado Anschutz Medical Campus (CU Anschutz) have certain rights concerning their education records under the Family Educational Rights and Privacy Act (FERPA). These rights include:

- 1. The right to inspect and review the student's education records within 45 days of the day that the university receives a request for access. Students should submit to the registrar, dean, head of the academic department or other appropriate official, written requests that identify the record(s) they wish to inspect. The university official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the university official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.
- 2. The right to request the amendment of the student's education records that the student believes are inaccurate or misleading. Students may ask the university to amend a record that they believe is inaccurate or misleading. They should write the university official responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading. If the university decides not to amend the record as requested by the student, the university will notify the student of the decision and advise the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
- 3. The right to consent to disclosure of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. One exception which permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by the university in an administrative, supervisory, academic or research or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the university has contracted (such as an attorney, auditor or collection agent); a person serving on the Board of Regents; or a student serving on an official committee, or assisting another school official in interest if the official needs to review an education record in order to fulfill his or her professional responsibility. Upon request, the university discloses education records without consent to officials of another school, in which a student seeks or intends to enroll.
- 4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the University of Colorado Denver to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-5920

FERPA generally requires the University to obtain student consent prior to disclosing their education records or personally identifiable information contained therein. One exception, which permits disclosure without student consent, is information about the student that the University has

designated as "directory information." The following items are designated "directory information" and may be released at the discretion of the University of Colorado unless a student files a request to prevent their disclosure:

- name
- · address, telephone number, and e-mail address
- · dates of attendance
- · registration status
- · class (i.e. freshman, sophomore, junior, senior)
- major
- awards
- · honors
- · degrees conferred
- · photos

Although these items are designated by CU Anschutz as directory information, only a limited amount of this information is routinely disclosed by CU Anschutz officials, and the University retains the discretion to refuse to disclose directory information if it believes such disclosure would be an infringement of student privacy rights.

Forms to prevent disclosure of directory information can be obtained at the Registrar's Office in Education II North, or visit the Registrar's website (https://www.cuanschutz.edu/registrar/home/). Questions regarding your rights under FERPA should be directed to the Registrar's Office:

CU Anschutz Medical Campus

Campus Box A054 Phone: 303-724-8000 Fax: 303.724.8060

Email: Registrar@cuanschutz.edu

#### **Definition - Education Record**

Those records directly related to a student and maintained by the institution or by a party acting for the institution are considered education records. The term "education records" does not include the following:

- Records of instructional, supervisory, administrative, and certain
  educational information that is in the sole possession of the maker
  thereof, and are not accessible or revealed to any other individual
  except a substitute who performs on a temporary basis (as defined
  in the institutional personnel policy) the duties of the individual who
  made the records.
- Records maintained by a law enforcement unit of the educational agency or institution that were created by that law enforcement unit for the purpose of law enforcement.
- Records relating to individuals who are employed by the institution, which are made and maintained in the normal course of business, relate exclusively to individuals in their capacity as employees, and are not available for use for any other purpose. Records of individuals who are employed as a result of their status as students (for example, work study students) are education records.
- · Records relating to a student which are:
  - Created or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional, acting in his/her professional capacity or assisting in a paraprofessional capacity or assisting in a paraprofessional capacity. Used solely in connection with the provision of treatment to the student.

 Not disclosed to anyone other than individuals providing such treatment.

#### **Definition - Legitimate Educational Interest**

This means the demonstrated need to know by those officials of an institution who act in the student's educational interest, including faculty, administration, student employees, clerical and professional employees, and other persons who manage student records information.

Any school official who needs information about a student in the course of performing instructional, supervisory, advisory, or administrative duties for the University of Colorado Anschutz Medical Campus has a legitimate educational interest.

This includes contractors, consultants, volunteers and other outside providers used by the University of Colorado Anschutz Medical Campus, such as the University of Colorado Foundation and the National Student Clearinghouse.

#### **Directory Information**

FERPA directory information is information contained in a student's education record that generally would not be considered harmful or an invasion of privacy if disclosed. Under current CU Anschutz policy, the following information is designated as directory information:

Student name. If provided, a preferred name will be used when there is not a documented business or legal reason to provide a student's primary name. Students may also select a diploma name for graduation and commencement materials.

- · Hometown (city, state)
- · Campus email address\*
- · Dates of attendance
- · Previous educational institutions attended
- · School/college or division of enrollment
- · Majors, minors and field of study
- · Classification level (e.g., freshman, sophomore, graduate student)
- · University-recognized honors and awards
- Degree status (e.g. expected graduation date and/or conferral dates/ terms)
- · Enrollment status
- Employment related to student status (e.g. teaching assistant, resident assistant or work-study) and dates for positions held
- Participation in officially recognized activities/sports, including height and weight of athletes
- · Photos and videos taken or maintained by the university

\*Campus email addresses are only disclosed to requestors who agree not to use them for solicitation.

Although these items are designated by CU Anschutz as directory information, only a limited amount of this information is routinely disclosed by CU Anschutz university officials. The university retains the discretion to refuse disclosure of directory information if it believes such disclosure would be an infringement on student privacy rights.

#### **Nondisclosure of Directory Information**

Students may ask the University not to publicly disclose directory information. Students should be advised, however, if they are seeking employment, the Registrar's Office cannot release their enrollment,

degree status or major to anyone unless the student comes to the Registrar's Office with a photo ID.

Forms to prevent disclosure of directory information can be obtained at the Registrar's Office in Education II North, or by visiting the CU Anschutz Registrar's website (https://www.cuanschutz.edu/registrar/). Questions regarding student rights under FERPA should be directed to the Registrar's Office:

CU Anschutz Medical Campus Campus Box A054

Phone: 303-724-8000 Fax: 303.724.8060

Email: Registrar@cuanschutz.edu

## **Exceptions to Student Consent for Release of Educational Records**

FERPA allows the institution the right to disclose student records or identifiable information without the student's consent under the following circumstances:

- To authorized representatives for audit of Federal or State supported programs.
- To university employees who are in the process of carrying out their specifically assigned educational or administrative responsibilities acting in the student's educational interest, including contractors, consultants, volunteers and other outside providers used by the University of Colorado Anschutz Medical Campus, including the University of Colorado Foundation and the National Student Clearinghouse.
- · Veteran's Administration official.
- Officials of other institutions in which a student seeks or intends to enroll, after transfer enrollment or admission, disability and other health records may be released in the event of an emergency in the need to protect the health and safety of a student or other persons under FERPA.
- Persons or organizations providing financial aid to students.
- Organizations conducting studies for, or on behalf of, educational agencies or institutions to develop, validate, and administer predictive tests, to administer student aid programs or to improve instruction, provided that individual identity of students is not made.
- · Accrediting organizations carrying out their accrediting functions.
- Parents of a student who have established that student's status as a
  dependent according to Internal Revenue Code of 1954, Section 152;
  in connection with a health and safety emergency in connection with
  § 99.36; or the student is under 21 and has violated a federal, state or
  local law or a policy of the university related to the use or possession
  of alcohol or a controlled substance.
- Persons in compliance with a judicial order or a lawfully issued subpoena, provided that the institution makes a reasonable attempt to notify the student in advance of compliance. NOTE: The institution is not required to notify the student if a federal grand jury subpoena, or any other subpoena issued for a law enforcement purpose, orders the institution not to disclose the existence or contents of the subpoena.
- Persons in an emergency, if the knowledge of information, in fact, is necessary to protect the health or safety of students or other persons.

- An alleged victim of any crime of violence of the results of any institutional disciplinary proceeding against the alleged perpetrator.
   The information may only be given in respect to the crime committed.
- Schools may disclose personally identifiable information from education records to an outside contractor without prior written student consent if the outside contractor is a "party acting for" the institution and is performing a service which the institution would otherwise have to perform for itself (as in the case of the National Student Loan Clearinghouse for loan verification).
- Representatives of the Department of Homeland Security or Immigration and Customs Enforcement, for purposes of the coordinated inter-agency partnership regulating the Student and Exchange Visitor Information System (SEVIS).
- FERPA has been amended to permit educational agencies and institutions to disclose personally identifiable information from the student's records to the Attorney General of the United States or to his designee in response to an ex parte order in connection with the investigation or prosecution of terrorism crimes, under the US Patriot Act.
- Allows the return of an educational record, or information from an education record, to the party identified as the provider or creator of the record.
- Information regarding a registered sex offender's enrollment or employment status, or any changes of such.
- If the school determines that there is an articulable and significant threat to the health and safety to a student or other individuals, it may disclose information from educational records to appropriate parties.

#### **Release of Disciplinary Information**

Provisions of the Family Educational Rights and Privacy Act of 1974, as amended by the Higher Education Amendments of 1998, govern access to a student's disciplinary file. The student and/or those university officials who demonstrate a legitimate educational need for disciplinary information may have access to the student's disciplinary file.

The Campus Security Act permits higher education institutions to disclose to alleged victims of any crime of violence (murder, robbery, aggravated assault, burglary, motor vehicle theft) the results of the conduct proceedings conducted by the institution against an alleged perpetrator with respect to such crime. The Campus Security Act also requires that both accused and the accuser be informed of campus conduct proceedings involving a sexual assault.

Additionally, the Higher Education Amendments of 1998 permit disclosure of the final results of disciplinary cases in which a student has been found responsible for a violation involving violence or for a sex offense.

#### Concerns for Student Behavior, Health, and Safety

Across campuses nationwide, there has been a great deal of discussion related to the privacy of student records in relation to tragedies on college campuses. Most CU Anschutz Campus faculty and staff are aware that FERPA protects student rights to view their educational record, access and amend records, and control what disclosures can be made from these educational records. However, many University employees do not realize that FERPA does allow them to disclose information about students who they perceive to be behaving out of character, perceive the student to have a disturbing change in their normal behavior, or generate concerns about the safety of the student

or others. It is important for faculty and staff to understand that FERPA does not prohibit the disclosure of personal observations of students.

FERPA allows university staff and faculty the discretion to release this information under specified circumstances, and through proper channels, to appropriate personnel on campus.

#### What are the "specified circumstances"?

FERPA allows the disclosure of information from the educational record, without the written consent of the student, under the following: "Persons in an emergency, if the knowledge of information, in fact, is necessary to protect the health or safety of the student or other persons". The Department of Education interprets FERPA to permit institutions to disclose information from education records to parents if a health or safety emergency involves their son or daughter. For clarification purposes, the Department of Education recently proposed to amend the language of a "strictly construed" interpretation, and replace it with language that states the institutions have far "greater flexibility and deference" to "bring appropriate resources to bear on a circumstance that threatens the health or safety of individuals".

Some concerns have been expressed by faculty and staff on campus that they are reluctant to share any information with the appropriate personnel on campus if the student advised them, verbally or in writing, that they were seeing a mental health or other medical professional. Note that anything expressed verbally by a student is not part of the "educational record", and can be shared. If the student has advised a staff or faculty member of this in writing, it can still be shared with someone with "an educational need to know" as described by FERPA regulations, which would include those listed as the "appropriate personnel on campus" below.

To summarize: FERPA does not prohibit disclosure of personal observations to appropriate campus personnel about students of concern. Observers of such behaviors do not have to determine if this is an emergency that will be considered a threat of health or safety. They can consult with other appropriate personnel on campus for additional perspective, suggestions, resources, referral or assistance.

#### Who are the "appropriate personnel on campus"?

There are a variety of offices and personnel on campus who can be of assistance when you are faced with a student of concern. Some of these resources are listed below:

- <u>Department Chair/Associate Dean/Director</u> in many cases these individuals are excellent resources and can help you to support the student and/or find additional support and resources on campus.
- Student and Resident Mental Health Services located in the Anschutz Health Sciences Building (1890 N. Revere Ct, Suite 5040, Aurora, CO 80045), and available by phone at 303.724.4716. Appointments can be made by phone, or by emailing SMHservice@ucdenver.edu (smhservice@ucdenver.edu).
- The Campus Assessment Response & Evaluation Team (CARE) is a multidisciplinary team that reviews and evaluates student behavioral concerns and intervenes as appropriate. Contact the CARE Team to submit a concern online 24 hours a day on their website (https:// www.cuanschutz.edu/student/support/care-team/) and learn much more about recognizing and responding to students in crisis. Also available by phone at 303.724.8488.
- <u>CU Anschutz Student Outreach and Support Office (SOS)</u> located in Education II North, with additional information available via their website (https://www.cuanschutz.edu/student/support/casemanagement/). This office collaborates with all of the schools and

colleges to ensure students have access to resources that help them navigate challenging experiences. This office also manages the Medical Leave of Absence/Fit to Return process, and convenes the CARE Team when applicable. Staff are available to consult regarding disruptive behavior and concerns.

These offices are available for phone consultation to meet individually, or with a group of staff or faculty members to problem-solve about a particularly complex student situation. Other appropriate resources may also be referenced.

## Finally, in an urgent situation, never hesitate to call University Police at 303.724.4444, or for emergency calls, 911.

For more information about CU student mental health resources, please visit one of the websites below:

CARE Team (https://www.cuanschutz.edu/student/support/care-team/)

CU Anschutz Student Outreach and Support Office (https://www.cuanschutz.edu/student/support/case-management/)

Student and Resident Mental Health (https://medschool.cuanschutz.edu/psychiatry/programs/student-resident-mental-health/)

Some faculty think they should not reveal the name of the student and keep the consultation anonymous. However, this is key information for the consulting party as that professional may already have some information about the student of concern that should be added into the information for the best way to proceed. Some of these professionals may already have had contact with the individual and you may be providing key information which the professional would need to know to be effective. Licensed mental health professionals have strict confidentiality laws to follow which restricts their ability to inform you. FERPA allows great discretion in informing the mental health professional of observed professional observations, as well as allows observers to share information about a student with a person who has an "educational need to know".

In conclusion, it is important for all members of the CU Anschutz community to understand that FERPA does not prevent you from contacting others on the campus if you there are concerns about the behaviors of a student on campus. However, only those who are identified as the "appropriate personnel on campus" should be contacting the parents or other relatives of students. These trained individuals are most knowledgeable in human behavior, and can best determine if further concern is warranted.

## Requests for Access to and Amendments of Education Records

Brief Description: Establishes procedures for making and responding to requests for access to and amendment of education records, consistent with the Family Educational Rights and Privacy Act of 1974 (FERPA).

## Making and Responding to Requests for Access to Education Record

#### **Access Request and Review Procedure**

 A student should submit a request to review his or her education records in writing to the registrar, dean, chairperson of an academic department, or other official who maintains the records he or she wishes to inspect. The request should identify, to the extent possible, the specific records the student desires to review by type, topic, date or other criteria. The university official who has custody of the records will assemble the requested records and review them to determine whether they are eligible for access.

- If an education record includes information about more than one student, the student may review only his or her own information in that record. In this situation, the record custodian must redact the record before allowing the student to review it.
- Any questions about whether a record is eligible for review or how to properly redact an education record should be addressed with the Office of the Registrar.
- Before denying a student access to an education record, record custodians must consult with the Registrar, and should document in writing the reason for the denial.
- The record custodian must respond to a request for access to education records within a reasonable period of time, but in no case more than forty-five (45) days after the request has been submitted to the appropriate custodian. If the records are not maintained by the record custodian to whom the request was submitted, the custodian should assist the student in identifying the custodian to whom the request should be addressed. For information about where certain student education records may be located, consult the Office of the Registrar.

CU Anschutz Medical Campus Campus Box A054 Phone: 303-724-8000

Fax: 303.724.8060

Email: Registrar@cuanschutz.edu

- The record custodian will make arrangements for access and notify the student of the time and place where the records may be inspected.
- If not personally known to the record custodian, the record custodian must verify the student's identity by inspection of photo identification or other appropriate documentation.

## Making and Responding to Requests for Amendment of Education Records

#### **Procedure for Amendment of Education Records**

- If a student believes information contained in his or her record(s) is inaccurate, misleading or violates privacy rights, a student may ask the university to amend the record(s). If the problem stems from a clerical or other error in processing, the student should contact the record custodian and follow the established process to effect the necessary corrections. Similarly, a student should pursue the grievance and/or appeal process if he or she has a concern about the appropriateness of a grade awarded or other academic determination. This procedure does not apply to students who desire to challenge a grade. Students who wish to challenge a grade should follow the academic grievance policy in their school or college. If the desired correction of processing errors is not accomplished through normal channels, or the requested amendment is not to correct processing errors or address substantive academic decisions, the student should follow the following procedure:
- The record custodian will review the amendment request and any related documentation submitted by the student. The record custodian may request additional information from the student if deemed necessary to make a determination.
- Within a reasonable time after receipt of the written request, the record custodian will decide whether to amend the record as requested.

- If the record custodian grants the student's request, the custodian shall amend the education record and inform the student in writing of the action taken.
- If the record custodian denies the student's request, the custodian shall inform the student in writing of the decision and of his or her right to a hearing on the matter. Additional information about the hearing procedures will be provided to the student when notified of the right to a hearing.

#### **Right to Hearing and Related Procedures**

- Within ninety (90) days of the date of the denial of his or her request by the record custodian, a student may request a hearing.
- The Registrar may serve as the hearing officer, or may appoint another individual to serve as hearing officer. The appointed hearing officer shall not have a direct interest in the outcome of the hearing. The hearing officer shall not review any matter regarding the appropriateness of official grades or other such academic determinations.
- The hearing shall be conducted according to the following procedures:
  - The hearing officer shall give notice to all concerned parties of the date, place and time of a hearing reasonably in advance. The hearing should be scheduled within a reasonable period of time following receipt of the petition.
  - The hearing officer shall give the student an opportunity to present evidence relevant to the contested part of the education record. The student may have a representative present at the hearing, but that person cannot participate in the hearing.
  - The hearing officer may receive any evidence and testimony, orally or in writing, relevant to the student's challenge to the record content. The hearing officer shall not be bound by the rules of evidence applicable in courts of law, but may permit the introduction and receipt of evidence he or she determines is relevant.
  - Within a reasonable period of time, the hearing officer shall issue
    a written decision based solely upon the evidence presented
    at the hearing. A copy of the decision, which must include a
    summary of the pertinent evidence, shall be provided to the
    student, to the record custodian, and to the Registrar. The
    decision of the hearing officer shall be the university's final
    decision.
  - If the Registrar acting as hearing officer or an individual appointed by the Registrar to act as hearing officer determines that the information is inaccurate, misleading or otherwise in violation of the student's privacy rights, the Registrar should require the record custodian to make necessary amendments.
     The record custodian shall inform the student in writing when the amendment has been made.
  - If the hearing officer determines that the information is not inaccurate, misleading or otherwise in violation of the student's privacy rights, he or she shall inform the student in writing of the right to place a statement in the record commenting on the contested information in the record and/or stating why he or she disagrees with the decision.
  - The university must maintain the statement with the contested part of the record for as long as the record is maintained, and must disclose the statement whenever it discloses the portion of the record to which the statement relates.

#### **Contacts**

 Questions about this procedure should be directed to the Office of the Registrar.

CU Anschutz Medical Campus Campus Box A054 Phone: 303-724-8000

Fax: 303.724.8060

Email: Registrar@cuanschutz.edu

#### **Parental Access to Children's Education Records**

At the post secondary level, parents have no inherent rights to inspect a student's education records. The right to inspect is limited solely to the student. Records may be released to the parents only under the following circumstances:

- · Through the written consent of the student
- · In compliance with a subpoena
- By submission of evidence that the parents declare the student as a dependent on their most recent Federal Income Tax form (IRS Code of 1954, Section 152).
- May disclose education records to a parent under the alcohol and controlled substance exception or in connection with a health and safety emergency under the circumstances set forth in § 99.36 (if the students is under 21 years of age).

#### **Posting of Grades by Faculty**

The public posting of grades either by the student's name, institutional student identification number, or any portion of a social security number is a violation of FERPA, whether done via paper source or via electronic means (including the internet).

Instructors and others who post grades should use a system that ensures FERPA requirements are met. This can be done by using code words or randomly assigned numbers that only the instructor and individual students know.

#### Students' Rights after Ceasing Attendance or Graduation

Students who have ceased attendance or have graduated from an institution of higher education have basically the same FERPA rights as students currently attending the University of Colorado Denver, including the right to:

- · Inspect their education records
- · Have a hearing to amend an education record, and
- · Have their education privacy protected by the institution.
- · Have the institution honor the previously established opt-out request.

Once students leave the university they do not have the right to request a privacy code (non-disclosure) be placed on their records.

#### **References for Students by Faculty**

FERPA's prohibition on disclosure of personally identifiable information from an education record of a student applies to any kind of non-directory information (e.g., performance in class, grades, attitude, motivation, abilities, background) conveyed in writing, in person, or over the telephone to third-parties.

Although such information is usually conveyed by faculty members at the informal request of the student and is usually positive, the better practice would be to request a written consent form, meeting the FERPA requirements, before providing the information.

#### **Written Consent**

Students may release their academic records to their parents, a prospective employer, insurance companies, etc., by providing written consent. The notice of written consent must include the following information:

- 1. It must specify the records to be released (transcripts, etc.)
- 2. State the purpose of the disclosure
- 3. Identify the party or class of parties to whom disclosure may be made, and
- 4. Be signed and dated by the student

#### **Disposal of Educational Records**

Information about individuals should be retained according to state or University records retention schedule. Those responsible for academic information have an obligation to destroy information when conditions under which it was collected no longer prevail.

Any document containing personally identifiable information must be disposed of properly through some means of confidential disposal. If information is needed on confidential disposal, please contact the Office of the Registrar.

CU Anschutz Medical Campus

Campus Box A054 Phone: 303-724-8000 Fax: 303.724.8060

Email: Registrar@cuanschutz.edu

#### **Policy Reference Links**

- Title 24, Part 99--Family Educational Rights and Privacy (https://www.ecfr.gov/cgi-bin/text-idx/? SID=4b4094c9e8a435c5e9cf4026588c3ffe&mc=true&tpl=/ ecfrbrowse/Title34/34cfr99\_main\_02.tpl)
- FERPA General Guidance for Students (https://studentprivacy.ed.gov/ sites/default/files/resource\_document/file/An%20Eligible%20Student %20Guide%20to%20FERPA\_0.pdf)

### Freedom of Expression and Inquiry

Academic freedom and diverse viewpoints are highly valued at the University of Colorado Anschutz Medical Campus. For students, academic freedom pertains to their course discussion, course assignments, and scholarly work. All members of the University community have the right to free expression as stated in Article 1 (https://www.cu.edu/regents/law/1/).E of Regent Law and further elaborated in Regent Policy 1 (https://www.cu.edu/regents/policy/1/).D; however this right is distinct from academic freedom.

While faculty have the right to establish classroom procedures to ensure orderly discussion and progress towards the goals of a class, students have the freedom to raise questions and express reasoned opinions on the matters being discussed. Students also have the ability to discuss matters related to their courses with faculty during office hours and take reasoned exception to the views or methods offered in any course of study. Students should be evaluated solely on academic performance, which shall be assessed according to the published requirements established by the instructor or academic unit. Academic freedom does not give either faculty or students the right to disregard the standards of

conduct outlines in Regent Laws Article 7 (https://www.cu.edu/regents/law/7/).

If students believe their academic freedom rights have been violated, the campus will investigate complaints and remediate confirmed violations.

Also see Laws of the Regents Article 5 (https://www.cu.edu/regents/law/5/), Part B.

#### **Honor Code**

This campus-wide policy statement on student academic honor and conduct at the University of Colorado Denver | Anschutz Medical Campus was developed in consultation with faculty and student representatives from each health sciences school, and representatives of the campus-wide Faculty Council and Student Senate. It provides general policies for all students on campus, in accordance with the Regents' resolution of March 17, 1988, while at the same time it directs the schools to develop specific procedures to implement the policy in accordance with their unique programs and student populations. While the process for resolving honor code violations may vary from school to school, the elements listed below will remain uniform. The health professions are based on a high degree of trust by the individuals they serve. Students entering the health professions have a particular obligation, therefore, to conduct themselves at all times in a manner that reflects honesty, integrity, and respect for others.

#### A. Academic Honor and Conduct Code:

Education at the University of Colorado Denver | Anschutz Medical Campus is conducted under the honor system. All students who have entered health professional programs should have developed the qualities of honesty and integrity, and each student should apply these principles to his or her academic and subsequent professional career. All students are also expected to have achieved a level of maturity which is reflected by appropriate conduct at all times.

Although it is not possible to list every situation that violates the University of Colorado Denver | Anschutz Medical Campus academic honor and conduct code, the following examples will provide a reference point.

- Academic Honesty Students should adhere to the highest standards
  of academic honesty and integrity. Examples of behavior which
  violates these standards include: plagiarism (including improper use
  of web information), cheating illegitimate possession and/or use of
  examinations, and falsification of official records.
- Professional Conduct As future health professionals, students should also adhere to the highest standards of professionalism.
   Examples of unprofessional conduct include: misrepresentation of effort, credentials or achievement in either the academic or clinical setting; any action which compromises the quality of patient care; violation of patient confidentiality; and other conduct unbefitting a health professional.
- Alcohol and Drug Use Alcohol and/or drug abuse compromises the student's ability to learn and to practice as a health provider and, thus, is considered unprofessional conduct. Students who have a problem with alcohol and/or drugs should seek assistance from services available on campus. The sale of drugs or the possession of non-prescribed narcotics or other controlled substances is against the law. In order to minimize the potential for alcohol abuse at campus functions, students must work with University and/or their program administration to ensure compliance with the policies and procedures regarding functions where alcohol may be served.

 Respect for the Rights and Property of Others - Students should conduct themselves in a manner which recognizes the rights and property of others. Examples of inappropriate behavior include theft, damage to University facilities, harassment or physical assault, and any conduct which threatens the health or safety of others.

The primary responsibility for reporting violations of the student honor and conduct code rests with the individual student who has violated them However, fellow students and members of the faculty also share in this responsibility.

## B. Relationship of Honor and Conduct Code to Local, State, and Federal Laws

The University adheres to all appropriate local, state, and federal laws, and cooperates with law officials in all matters. Any alleged violation of local, state, or federal laws will be referred to the appropriate law enforcement agency, and such laws have precedence over the provisions of this policy.

#### C. Honor and Conduct Committee

Each school will have a standing Student Honor and Conduct Committee and, as appropriate, individual programs may have standing committees. The composition of the committee will include faculty and student representatives, with the exact composition of the committee to be determined by the dean in consultation with the school's faculty and student governance groups. The primary function of this committee will be to examine alleged violations of the honor and conduct code, and to make recommendations to the dean on these matters as appropriate.

## D. Check individual school policies for school-specific procedures.

#### **Student Conduct**

"By enrolling as a student in the university, a person shall assume obligations of performance and behavior established by the university relevant to its lawful missions, processes, and functions. As members of the academic community, students have responsibility, equivalent to that of the faculty, for study, learning, academic integrity, and protecting the university as a forum for the free expression of ideas."

(Laws of the Regents 7B Standards of Conduct)

### **International Travel Policy for Students**

This policy supports education and experiences abroad by balancing the value of participation in activities internationally with the potential risks to the welfare and safety of students. This policy establishes the minimum requirements to mitigate and manage risks associated with university-affiliated international travel by students.

"International" or "abroad" is defined to include U.S. territories as well as any country outside of the United States.

"Student" is defined as any participant in a university-related activity abroad who is not employed by the university as a trip leader. "Student" may include, but is not limited to, an enrolled student, member of a student organization, member of either campus Wellness Center, medical resident, alumnus, or program guest.

"University-related activity abroad" includes, but is not limited to, any activity supported by the university by use of university funds or financial aid; any activity related to academic credit, experiential learning, or service learning; or any activity receiving support from a university

employee such as organization, coordination, or supervision of activities abroad.

#### **Policy Statement**

The university facilitates student international travel and education abroad to foster interpersonal, academic, and career development, as well as cross-cultural understanding while encouraging sound health, safety, and security measures that minimize risks to the traveler and institution.

Policy 1035: Oversight of University-related International Travel outlines the oversight responsibility of the Office of International Affairs (OIA) "for all international travel taken under the auspices of the University of Colorado Denver | Anschutz Medical Campus," and designates the Office of Global Education (OGE), a unit within the Office of International Affairs, "responsible for direct oversight of all university-related student international travel." Further, it charges the International Risk Management Committee (IRMC) to assist OIA with the execution of its international risk management responsibilities.

As such, the IRMC will assess the health and safety risk profile of a given destination through the utilization of third-party risk resources, government risk rating systems, and global education best practices. This procedure will identify those destinations that do not require travel appeals for student international travel, identify destinations requiring a travel appeal, and identify destinations designated as "do not travel" for student international travel. The Office of Global Education's website will provide details.

Therefore, all students, faculty, or staff involved with individual students or groups of students traveling internationally under the auspices of the university must register with the Office of Global Education.

OGE will provide specific guidance, timelines, and processes. For international destinations or programs requiring travel appeals, the process of obtaining formal review and a decision by senior leadership on permissible travel during travel suspensions or too high risk destinations can take several months. Students, and faculty leading student international travel, will be advised by OGE to plan accordingly.

This policy applies to any student traveling internationally under the auspices of the university through the use of funds, group affiliation (e.g., through student organizations registered with and recognized by the Student Life & Campus Community office, community service or service learning groups, faculty-led travel or adventure travel), to fulfill academic requirements, or for other experiences. These experiences include but are not limited to, study, service learning, research, internship, clinical rotation, practicum, capstone project, other experiential learning, or sports.

All classes of students fall under this policy, including but not limited to, non-degree, undergraduate, graduate, doctoral, medical student, and medical resident. This policy does not apply to student international travel for solely personal purposes such as vacation or non-university work-related activity that has no affiliation with the university.

#### **Travel Approvals**

The university, in its sole discretion, may deny approval for student international travel due to risk or university policy. In addition, travelers may be required to submit an appeal to travel to locations or participate in programs that pose a specific health, safety, or security concern as indicated by authorities such as the contracted travel assistance provider, the U.S. Department of State (USDOS), the Centers for Disease Control and Prevention (CDC), World Health Organization (WHO), non-U.S. government authorities (e.g., Australian or Canadian authorities, or

international travel assistance provider), and the University of Colorado Denver | Anschutz Medical Campus authorities.

## Revocation, Suspension or Modification of Travel Approvals

When a significant health or safety concern arises (e.g., natural disaster, political disturbance, deteriorating security environment, disease outbreak, etc.), OIA and the IRMC will review student travel currently in progress and make recommendations to senior leadership who will determine if such activity may continue considering the circumstances. The university, in its sole discretion, may withdraw approval for or insist on modifications of international travel at any time. The provost, or the provost's designee, has final decision-making authority on university-related international travel for students.

#### Additions or Modifications to Approved Trips or Programs

If an approved international travel experience modifies or adds a new activity or academic track that materially changes its risk profile, the applicant must provide an explanation for further review of how any perceived risks will be mitigated. The applicant should consult with the Office of Global Education to determine which parts of the application require additional review.

#### **Program Cancellations**

- 1. If the university cancels a program before departure or while the program is in progress for reasons beyond its control, including but not limited to, political unrest, danger to participants' health or safety, natural disasters, or changes to the risk profile, participants may personally incur financial losses in the form of lost fees and tuition, or additional travel expenses in connection with program cancellation. Students may or may not receive academic credit if a program is canceled.
- 2. The University of Colorado Denver | Anschutz Medical Campus does not assume responsibility for financial risks associated with participation in a university-related activity abroad, including cancellation of a program. Students, staff, and faculty are encouraged to consider supplemental insurance options, such as trip insurance, to cover potential personal financial losses if programs or activities are canceled. Supplemental insurance is also helpful if a traveler needs to cancel participation in a program or return early due to unforeseen personal emergencies. Such insurance is not required by the university and must be purchased on an individual basis.

#### **Unaffiliated Guests on Group Travel**

The university does not support accompanying unaffiliated travelers on official university programs. The university does not permit unaffiliated travelers to accompany the group on any international programs or activities during the entire duration of the program or activity. "Unaffiliated travelers" refers to family members, friends, and other individuals not associated with the particular program. Exceptions may be requested through a prescribed appeal process with the IRMC.

## Consequences of Violating Policy/Travel in Violation of this Policy

Individual students who have not obtained travel permission (or whose travel program administrators have not obtained travel permission for group travel) will be referred to the Office of Student Conduct and Community Standards and/or other appropriate offices for potential policy violations. Consequences may include, but not be limited to, conduct sanctions; not receiving institutional funds including financial

aid, grant funding, or payment of expenses for related international travel activities; repayment of any spent funds; and/or assessment of a fee.

Employees who knowingly facilitate undisclosed or unapproved or non-reviewed university-sponsored student international travel may be subject to discipline under university policies and procedures.

Students and employees who choose to travel in knowing violation of this policy are acting outside the control and responsibility of the university.

### **Lactation Policy**

The University of Colorado Denver | Anschutz Medical Campus ("university") has adopted this policy for students and employees who wish to breastfeed and/or express breastmilk on the CU Denver campus or the CU Anschutz campus.

#### **Policy Statement**

#### 1. Lactation on Campus for Students and Employees

- a. The university recognizes that reasonable and appropriate adjustments should be considered and offered for students or employees wishing to lactate in order to optimize performance in the classroom or workplace, as applicable.
- As a result, the university endeavors to provide time, space and reasonable adjustments to the university's work or educational programs in order to support students and employees who choose to breastfeed and/or express breastmilk.
- b. The university also recognizes that some pregnancy-related conditions may be protected under the Americans with Disabilities Act and amendments ("ADA"), entitling students and employees to request reasonable accommodations.
- c. Students planning to breastfeed and/or express breastmilk should reach out to the Office of Equity to discuss reasonable break times or related requests for curricular adjustments.
- d. Employees planning to breastfeed and/or express breastmilk should reach out to their supervisors to discuss reasonable unpaid break time or the use of paid break time (e.g., lunch) for this purpose.

#### 2. Lactation Breaks

a. Pursuant to state law, the university is required to provide employees reasonable break time to express breastmilk for a child for up to 2 years after the child's birth. The university will provide lactating employees the option of three, 20 minute breaks per workday or two, 30 minute breaks per workday, which includes paid meal breaks.

#### 3. Designated Lactation Spaces

- a. The university currently offers lactation rooms throughout the CU Denver campus and the CU Anschutz campus to assist breastfeeding or lactating parents.
- b. These rooms provide a secure and sanitary area that may be used for breastfeeding or pumping breastmilk and are equipped with an electrical outlet, chair, table for breast pump, nearby access to clean running water, lock from inside and, if a room has a window that needs to be covered in order to address privacy concerns, a window covering will be provided. For large lactation spaces intended to be shared by multiple breastfeeding parents, privacy screens may be provided. In certain spaces designated as lactation lounges, the space is designed to support social interaction by multiple users.

Thus, privacy screens are not utilized in such designated lactation lounges.

- c. Individuals expressing breastmilk are expected to make their own arrangements for refrigeration, which includes, but is not limited to, the option to utilize refrigerators otherwise designated for employee or student use, or to bring their own refrigeration device to store breastmilk. Should an employee or student wish to bring their own refrigeration device to campus, they must receive approval from their supervisor or space authority, as applicable. The ability to bring such a personal refrigeration device to campus is subject to the availability of adequate space and power. Even after such approval is obtained, the university assumes no responsibility for the device or its contents. The maximum size of a personal refrigeration device is no larger than a small (20 inch by 20 inch by 20 inch) dormitory type refrigerator. The university is not responsible for the integrity or security of breastmilk stored in any refrigerator on campus and does not guarantee the safety of any storage method used. Students or employees who desire to leave their personal refrigeration devices on campus on an ongoing basis, in the lactation rooms or otherwise, may do so, but at their own risk. Employees and students must provide their own containers for storage.
- d. The university has posted the list and map of available lactation rooms on the CU Denver campus and the CU Anschutz campus online at: https://www.cu.edu/docs/cu-denveranschutz-campus-lactation-rooms and https://www1.ucdenver.edu/offices/equity/support-resources/pregnancy-lactation-2. The Office of Equity will annually review and update the list, as necessary.

#### e. Access to lactation spaces

When existing locations are not accessible from a breastfeeding student's class/study area or employee's work area, or the current demand for existing spaces makes as-needed pumping challenging, students may contact the Office of Equity to identify a new temporary space, as needed.

#### 4. Whom to Contact

- a. Employees or students with questions regarding the university's lactation resources or concerns regarding discrimination based on pregnancy or parenting may contact the university's Office of Equity.
- b. If you are a student at CU Denver Campus and need to make an application for reasonable accommodations or need information regarding the ADA, contact the Office of Disability Resources and Services at (303) 315-3510 or disabilityresources@ucdenver.edu or by mail to CB 118 P.O. 173364 Denver, CO 80217-3364.
- c. If you are a student at the CU Anschutz Medical Campus and need to make an application for reasonable accommodations or need information regarding the ADA, contact the Office of Disability Access and Inclusion at (303) 724-5640 or disabilityresources@cuanschutz.edu, or by mail at Building 500, Room Q20- EG 305 13001 E. 17th Place, A010 Aurora, CO 80045.
- d. If you are an employee and need to make an application for reasonable accommodations or need information regarding the ADA, contact the ADA Coordinator at (303) 315-2700 or

HR.ADACoordinator@ucdenver.edu or by mail to P.O. Box 173364, Campus Box A005/130, Denver, CO 80217-3364.

#### **Definitions**

- The terms "breastfeeding person," and "lactating person" are used interchangeably and intended to include any student or employee who expresses breastmilk for the nourishment of their child.
- 2. The term "employees" includes, but is not limited to, staff, faculty, post-doctoral fellows, contract workers, and residents.
- The term "students" includes, but is not limited to, all students, including part-time, full-time, degree-seeking, non-degree seeking, undergraduate, or graduate student enrolled at CU Denver or CU Anschutz.

## Medical Leave of Absence and Fit to Return

A student with a mental health and/or physical health condition may apply for a voluntary Medical Leave of Absence from the University of Colorado Anschutz Medical Campus. This policy describes the circumstances under which a student may request a Medical Leave of Absence and the procedures the student must follow.

#### **Policy Statement**

Students may seek a Medical Leave of Absence only for their own personal mental health and/or physical health circumstances. Students seeking a leave of absence for other reasons should contact their program director or the Office of the Registrar.

Students participating in an international education program may not seek a Medical Leave of Absence for the term in which the student is participating in the international education program.

The Medical Leave of Absence is not intended to shield a student from unsatisfactory progress or any other academic irregularity unrelated to a mental health and/or physical health condition that causes a degree of functional impairment that warrants a complete withdrawal from academic study for an academic term as provided in this policy.

Students who receive an approved Medical Leave of Absence are eligible for relief from their school or college's time-to-degree requirements, but remain subject to the time-to-degree requirements for any applicable accrediting body.

If a student takes courses for credit at another institution while on a Medical Leave of Absence, the student must comply with the applicable policies for receiving transfer of credit toward a degree from their school or college.

A student who has already received a Medical Leave of Absence during enrollment in an educational program and who has a mental or physical health emergency during a subsequent term may submit a request for an additional Medical Leave of Absence.

The Assistant Vice Chancellor for Student Affairs or their designee, in consultation with the applicable dean at the school or college, and the Medical Director of Student Mental Health or their respective designees, has the discretion to determine whether to grant an additional Medical Leave of Absence.

If CU Anschutz approves a Medical Leave of Absence, the Office of Case Management will notify relevant offices/departments that the student is withdrawing for medical reasons.

A student cannot withdraw a request for a Medical Leave of Absence after CU Anschutz has approved the request.

If the student is unable, due to their mental health and/or physical health condition, to complete an application for a Medical Leave of Absence, at the discretion of the Assistant Vice Chancellor for Student Affairs or their designee, CU Anschutz may accept an email from the student as notice that another individual will complete the application on behalf of the student, provided that the student has executed a FERPA release, as needed, for such individual.

#### **Medical Leave of Absence**

- The student may submit an electronic application to the Office
  of Case Management for a Medical Leave of Absence for mental
  health and/or physical health conditions that prevent the student
  from functioning successfully or safely as a member of the CU
  Anschutz community. Students should promptly seek care from their
  treating physician, licensed mental health provider, or other licensed
  healthcare provider and should request a Medical Leave of Absence
  as soon as possible.
  - In exceptional circumstances, students may submit an application for a Medical Leave of Absence after the last day of the term. If submitting an application after the last day of the term, students may be required to complete additional procedures and provide additional documentation at the request of the student's progression body.
- 2. Along with the application, the student must submit adequate medical documentation from the student's treating physician, licensed mental health provider, or other licensed healthcare provider specifying a mental health and/or physical health condition that causes a degree of functional impairment that warrants a complete withdrawal from all academic activities including, but not limited to, academic study and/or clinical rotations for an academic term. The student and the provider should have a shared understanding of the information being submitted to CU Anschutz on the student's behalf. CU Anschutz will request documentation from the provider that must include the following:
  - a. The treating physician, licensed mental health provider, or other licensed healthcare provider's professional qualifications and licensure
  - b. Date the student first consulted the provider
  - c. Number of visits with the provider
  - d. Professional opinion regarding the approximate date on which the symptoms first began
  - e. Diagnosis of the mental health and/or physical health condition or statement of symptoms and plan for diagnostic workup
  - f. Impact of the condition on the student's academic activities (including attending classes and completing coursework)
  - g. Identification of the degree of functional impairment(s) that warrants withdrawal from all courses for the term
  - h. Treatment recommendations and estimated length of treatment plan
- Submission of an application for a Medical Leave of Absence does not guarantee that the requested Medical Leave of Absence will be approved.

#### **Reentry from a Medical Leave of Absence**

The student must complete the following steps for the reentry process:

- Submit a Return from a Medical Leave of Absence application and an academic and transition success plan to the Office of Case Management.
- 2. Submit medical documentation from the student's treating physician, licensed mental health provider, or other licensed healthcare provider. The student and the provider should have a shared understanding of the information being submitted to CU Anschutz on the student's behalf. CU Anschutz will request documentation from the provider and must include the following:
  - a. The treating physician, licensed mental health provider, or other licensed healthcare provider's professional qualification and licensure
  - b. Professional opinion regarding the student's ability to successfully perform academically with a full-time and/or half-time course load at CU Anschutz with or without continued treatment
  - c. A treatment summary with the following specificity:
    - Time span and type of treatment provided to the student during the student's time away from CU Anschutz
    - Whether the treatment was concluded (with or without the healthcare provider's approval) or is on-going
    - Specific intensive treatment, if any, while on the Medical Leave of Absence
    - Demonstrated understanding of the diagnoses and functional impairment that resulted in a Medical Leave of Absence, and clear evidence that the healthcare provider completing the medical documentation for reentry addressed these
    - specific issues in the treatment of the student during the Medical Leave of Absence
    - If treatment is ongoing, recommended treatment plan during student's return to full-time study
    - · Any continuing care needs or concerns for the student
    - Any safety concerns for the student or for others in the CU Anschutz community

The submitted medical documentation will be reviewed by the Medical Director of Student Mental Health or other non-treating clinician. The non-treating clinician may indicate agreement or disagreement with the treating provider's recommendation or request additional follow-up or documentation.

The Assistant Vice Chancellor for Student Affairs or their designee, in consultation with the applicable dean at the school or college, and the Medical Director of Student Mental Health or their designee, has the discretion to determine whether the student has submitted sufficient documentation to support the Return from a Medical Leave of Absence application and approve or deny reentry.

CU Anschutz may establish conditions for the student in the first term after reentry based on the information provided in connection with the Return from a Medical Leave of Absence application. If the student's Return from a Medical Leave of Absence application is approved with conditions, the student must also submit updated medical documentation consistent with the conditions or as otherwise provided in the approval of the Return from a Medical Leave of Absence application.

The student must submit medical documentation and any other information required by the Return from a Medical Leave of Absence application with sufficient time to allow for processing and registration. The student must also comply with all other applicable procedures for returning to CU Anschutz.

If a student seeks to extend their Medical Leave of Absence beyond one year, the student should contact the staff in their specific School/College or Office of Case Management to discuss applicable procedures.

Students may appeal a decision denying a Medical Leave of Absence and/or Reentry to the Assistant Vice Chancellor for Student Affairs or their designee. An appeal will only be considered when the student submits a completed appeal form, available from the Office of Case Management, to the Office of Case Management within five (5) business days of the date on the denial letter. The grounds for appeal are limited to the following:

- The existence of procedural errors so substantial that such errors greatly impacted the decision
- New medical documentation that was not reasonably available at the time of the initial decision.

Students who have concerns regarding a possible violation of CU Anschutz's anti-discrimination policies should contact the Office of Equity.

## Protected Class Nondiscrimination Policy I. INTRODUCTION AND POLICY STATEMENT

At the University of Colorado ("university"), our vision pursuant to regent policy 10.A ("Diversity, Equity, and Inclusion") (https://www.cu.edu/regents/policy/10/) is to be a premier, accessible, and transformative public research university that has diverse and inclusive working and learning environments woven into the fabric of our entire organization. Such environments are crucial to promoting academic excellence, most notably outstanding teaching, learning, research, creative work, meaningful community engagement, and culturally responsive healthcare.

This Protected Class Nondiscrimination Policy ("Policy") prohibits discrimination and harassment on the basis of race, color, national origin, sex, age, disability, creed, religion, veteran status, marital status, political affiliation, political philosophy, pregnancy or related conditions, sexual orientation, gender identity and gender expression consistent with Regent Law Article 8.A: Nondiscrimination (https://www.cu.edu/regents/law/8/). This Policy is intended to ensure equal access to the academic and professional experiences at the university, defines prohibited conduct and reporting obligations, and provides information regarding campus support services for involved parties.

The university must have an office at each campus with specialized expertise to address allegations of prohibited conduct under this Policy in a manner that safeguards the dignity and rights for all involved. The Equity Offices at each campus implement this Policy and administer related campus procedures.

Reporting options and accommodation information (related to disability, pregnancy, and religion) at The University of Anschutz Medical Campus are located within the Office of Equity (https://www.ucdenver.edu/offices/equity/resolution-options/).

Anyone who encounters an issue or seeks guidance related to this Policy should consult with the campus Equity Office. University employees who

are Responsible Employees (mandatory reporters) must promptly report allegations of prohibited conduct, as further outlined in the Policy. It is also critical that anyone who may have been the target of, or who has experienced, prohibited conduct in the context of university education programs, activities, or employment, feel free to report their concerns without fear of retaliation.

All members of the university community enjoy freedom of speech as guaranteed by the United States Constitution, Colorado Constitution, and Regent Law, Article 1.E: Freedom of Expression (https://www.cu.edu/regents/law/1/). This Policy is intended to protect members of the campus community from prohibited conduct, not to regulate protected speech. While the university may not discipline speakers for protected speech, the university retains an obligation to take other steps as necessary to ensure that no hostile environment based on any protected class persists. The university also recognizes academic freedom, as defined in regent law, articles 5.B (https://www.cu.edu/regents/law/5/) and 7.C (https://www.cu.edu/regents/law/7/), and this Policy will not be interpreted to prohibit conduct that is legitimately related to course content, teaching methods, research, or scholarship, or the expression of political and academic views of students and faculty.

#### **II. Prohibited Conduct**

#### Discrimination and harrasment

This Policy prohibits discrimination and harassment based on protected class (for definitions of protected classes see section II.B). To report information or make a complaint about conduct that may violate this Policy, individuals may contact the Office of Equity (https://www.ucdenver.edu/offices/equity/resolution-options/).

Each of the following categories are prohibited and could be charged as potential violations of this Policy in a formal adjudication:

#### 1. Discrimination on the basis of protected class:

 When an individual suffers an adverse consequence on the basis of a protected class. Examples include, but are not limited to, failure to be hired or promoted; denial of admission to an academic program; or failure to provide or implement legally required accommodations (e.g., accommodations approved by the campus ADA Coordinator, Disability Services Office or other designated office) as related to an individual's disability, pregnancy/pregnancy-related conditions or religion.

#### 2. Harassment on the basis of protected class:

- Unwelcome verbal, written, or physical conduct based on one's protected class that unreasonably interferes with an individual's work or academic performance or creates an intimidating or hostile work or educational environment.
- Hostile environment is a form of harassment. Whether a hostile
  environment exists is determined by evaluating whether or not
  an individual experienced unwelcome conduct and whether
  or not the unwelcome conduct was, from the perspective of a
  reasonable person in the alleged individual's position, sufficiently
  severe, persistent, or pervasive that it unreasonably interferes
  with, limits, or deprives an individual from participating in or
  benefiting from the campus's education or employment programs
  and/or activities. Although repeated incidents increase the
  likelihood that harassment has created a hostile environment, a
  single or isolated incident of conduct based on protected class
  may be sufficient.

## **Discrimination and Harassment – Definitions of Protected Classes**Protected class under this Policy refers to actual or perceived unless otherwise noted below:

- Age: The length of time a person has lived. An employee must be at least 40 years old to fall within the protected category. Students are protected from age discrimination in academic situations like admissions decisions and residence hall assignments, regardless of their age.
- Color\*: The pigmentation of one's skin. An individual can make an allegation of color discrimination or color harassment against someone of the same race or color.
- 3. Creed\*: All aspects of religious beliefs, observances or practices, as well as sincerely-held moral and ethical beliefs as to what is right and wrong, and/or addresses ultimate ideas or questions regarding the meaning of existence, as well as the beliefs or teachings of a particular religion, church, denomination or sect. A creed does not include political beliefs, association with political beliefs or political interests, or membership in a political party.
- Disability: Physical or mental impairment that substantially limits one or more major life activities of an individual.
- Gender: Sex, gender identity, and gender expression including a
  person's gender-related self-image, appearance, behavior, expression,
  or other gender-related characteristic, regardless of the sex assigned
  to that person at birth.
- Gender Expression: How a person represents or expresses their gender to others through external appearance, characteristics, or behaviors.
- 7. **Gender Identity**: The internal deeply-held sense of one's gender which may be the same as or different from one's sex assigned at birth.
- 8. Marital Status: A relationship or a spousal status of an individual including, but not limited to, being single, cohabitating, engaged, widowed, married, in a civil union, or legally separated; or a relationship or a spousal status of an individual who has had or is in the process of having a marriage or civil union dissolved or declared invalid.
- National Origin or Shared Ancestry\*: A person's (or a person's ancestors') place of origin or the physical, cultural, or linguistic characteristics of an ethnic group.
- Political Affiliation: A person's membership or association with others in commonality of political purpose and support.
- 11. **Political Philosophy**: A person's belief or endorsement of any system of thought pertaining to public policy or the administration of governmental functions.
- 12. Pregnancy or related conditions: (1) Pregnancy, childbirth, termination of pregnancy or lactation; (2) medical conditions related to pregnancy, childbirth, termination of pregnancy or lactation; or (3) recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.
- 13. Race\*: How individuals may self-identify as a certain ethnic and racial category (socio-political constructs) or as multi-racial. All racial categories are protected under this Policy. Race also includes hair texture, hair type, or a protective hairstyle commonly or historically associated with race, such as braids, locs, twists, tight coils or curls, cornrows, Bantu knots, Afros and headwraps.
- 14. **Religion\***: All aspects of religious observance, belief and practice. A person does not have to be a member or follower of a particular organized religion, sect or faith tradition to have a religion.

- 15. **Sex**: The labels of "male," "female," and/or "intersex" typically assigned at birth and based on anatomy and biology.
- 16. Sexual Orientation: An individual's physical, romantic, and/or emotional attraction toward people. Examples include, but are not limited to: heterosexual, bisexual, gay, lesbian, pansexual, asexual, queer, demisexual, or questioning.
- 17. Veteran Status: Refers to anyone who serves or who has served in any branch of the United States armed forces, including students in the Reserve Officer Training Corps (ROTC). Volunteers for military duty must be treated the same as those who are ordered to active duty. \* The university construes antisemitism, Islamophobia, and caste to be included within the university's current prohibitions on discrimination or harassment, which may be based on the protected classes of race, color, religion, creed, national origin or ancestry. All protected classes listed above encompass intersectional identities.

#### **Related Violations**

This Policy prohibits violations related to protected class discrimination and harassment. To report information or make a complaint about conduct that may violate this Policy, individuals may contact the Office of Equity (https://www.ucdenver.edu/offices/equity/resolution-options/).

Each of the following actions are violations related to discrimination and harassment, are prohibited, and could be charged as potential violations of this Policy in a formal adjudication:

#### 1. Failure to Comply with Orders or Sanctions:

 Not complying with orders of the Equity Office or other appropriate university officials related to this Policy including, but not limited to, No-Contact Orders, Exclusion Orders, and Orders for Interim Suspension. Members of the university community must abide by and complete sanctions related to prohibited conduct.

#### 2. Failure to Report:

• When (1) the Responsible Employee received information that a member of the university community was subjected to or committed an act of alleged prohibited conduct, and (2) the Responsible Employee intentionally, knowingly, or recklessly disregarded the obligation to report, thus resulting in harm to a member of the university community. A Responsible Employee is defined below in section III.C.2. This provision will be applied in a manner that promotes the reporting of prohibited conduct and avoids disciplinary actions when Responsible Employees conscientiously discharge their reporting obligations.

#### 3. Interference with Reporting:

 Prohibiting or interfering with a Responsible Employee or any other person's reporting to the Equity Office. A Responsible Employee is defined below in section III.C.2.

#### 4. Providing False or Misleading Information:

 When a person knowingly or recklessly provides false or misleading information to an Equity Office in the course of a resolution process. Making a report or providing information in good faith, even if the information reported is not later substantiated, will not constitute a violation of this Policy.

#### 5. Retaliation:

Adverse educational or employment actions, including direct
or indirect intimidation, threats, and harassment, taken against
an individual because of their involvement in a complaint of
prohibited conduct. An adverse educational or employment action
is any conduct that would dissuade a reasonable person from
reporting an allegation of, or participating in, an investigation of
prohibited conduct.

#### III. Resources and Reporting

A. Options for Assistance and Reporting Following an Alleged Incident of Prohibited Conduct

When the university receives a report of prohibited conduct against an individual, whether the conduct occurred on or off campus, the campus shall provide the individual with notification of the following, as applicable:

- 1. Reporting rights and options, including:
  - a. to whom and how to report an alleged offense, including campus authorities and local law enforcement authorities;
  - b. to be assisted by campus authorities in making a report; and
  - c. to decline to notify such authorities.
- The importance of preserving evidence that may assist in proving a criminal offense occurred or may be helpful in obtaining a protective order;
- The method by which a person can seek No-Contact Orders, orders
  of protection, restraining orders, or similar lawful orders issued by a
  court or other competent authority;
- Counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, and other services available on campus or in the community; and
- 5. Options for, and available assistance in, changing transportation and working situations, in addition to any available academic and residential accommodations. This notification shall be made, and accommodations afforded if they are reasonably available, regardless of whether the person who reported experiencing prohibited conduct chooses to participate in any campus investigation or disciplinary proceeding or to report the crime, if any, to law enforcement.
- B. Confidential Resources and Privacy

#### 1. Confidential Employees/Independent Notification Obligations:

• The university supports the use of confidential resources for all parties. Employees who are confidential resources are not Responsible Employees who are required to report allegations of prohibited conduct under this Policy. A confidential employee must explain to an individual alleging prohibited conduct (1) their status as a confidential employee for purposes of this Policy and that they are not responsible employees who report to the Equity Office; (2) how an individual may contact the Equity Office and make a complaint under this Policy; and (3) that the Equity Office may be able to offer and coordinate supportive measures, as well as initiate an informal or formal resolution process. A person who is a confidential resource under this Policy may have an independent obligation to report some forms of criminal conduct to law enforcement officials.

#### 2. Confidential Resources:

- This link provides information on how to contact the university's confidential employees: CU Denver | Anschutz (https:// www.ucdenver.edu/offices/equity/support-resources/).
- Communications of prohibited conduct to a Responsible Employee are not confidential, and these employees must report prohibited conduct to the Equity Office when it is disclosed to them.

#### 3. Privacy and Information Disclosure:

 The university will not disclose the identity of any individual involved in a complaint of prohibited conduct (parties or witnesses for example) except as may be permitted by prior written consent, required by law, or to carry out an informal or formal resolution or judicial proceeding related to this Policy. This may require sharing information, including identification information, between internal university offices.

#### 4. Requests Not to Proceed and Overriding Factors:

- If an individual has allegedly been subjected to prohibited conduct, but wishes to maintain privacy or requests that no resolution process be pursued nor disciplinary action taken, the Equity Office will explain that the university prohibits retaliation and explain the steps the campus will take to prevent retaliation if the individual participates in a resolution process, and that the campus will take responsive action if it occurs.
- If, having been informed of the campus's prohibition of retaliation and its obligations to prevent and respond to retaliation, the individual allegedly subjected to prohibited conduct would still like to maintain privacy or requests that no investigation be conducted nor disciplinary action taken, the Equity Office will weigh that request against the university's obligation to provide a safe, non-discriminatory environment for all students, faculty, and staff. In making that determination, the Equity Office will consider a range of potentially overriding factors that would cause the campus to commence an investigation or take disciplinary action after an investigation of prohibited conduct occurred.

#### 5. Findings of a Policy Violation:

 The university recognizes that third parties (either employers and/or institutions receiving transferring students) may have a legitimate interest in knowing whether a university employee or student has been found responsible for engaging in prohibited conduct. In the event that, after a grievance process and any rights of appeal have been completed, an employee or student has been found responsible for engaging in prohibited conduct, the university may confirm upon inquiry from a potential employer, or licensing or credentialing agency or institution, that the employee or student has been found responsible for violation of this Policy subject to applicable state and federal laws (e.g., Family Educational Rights and Privacy Act) regarding such disclosures. The university may also confirm upon inquiry that an investigation under this Policy is pending against an employee or student or that an employee or student resigned employment or withdrew while an investigation under this Policy was pending, again subject to applicable state and federal laws.

#### C. Reporting Allegations of Prohibited Conduct

#### 1. Purpose of Reporting:

The university provides mechanisms for members of the
university community to report allegations of prohibited conduct.
Reporting allows the university to pursue resolution processes
when appropriate, and to inform those who have been involved
of support services and to facilitate access to those services.
Reporting also allows the university to identify institutional risks,
increase the effectiveness of its training programs, and identify
the need for additional services that will protect the university
community from harm. Reporting allegations of prohibited
conduct is fundamental to the university's ability to provide
campus environments that allows equal access to educational
and employment opportunities.

## 2. Responsible Employees Must Report Prohibited Conduct to the Equity Office:

Responsible Employees are defined as any employee who: (1) has
the authority to hire, promote, discipline, evaluate, grade, formally
advise or direct faculty, staff, or students; (2) has the authority
to take action to redress prohibited conduct; and/or (3) has been

given the duty of reporting incidents of prohibited conduct by the Equity Office. The Equity Office may designate in campus procedures that certain individuals who might otherwise not be considered Responsible Employees are subject to mandatory reporting requirements. Responsible Employees must promptly report allegations of prohibited conduct as defined by the Policy to the Equity Office. A "Failure to Report" as defined by section II.C.2 is considered Prohibited Conduct.

- a. Any Responsible Employee who witnesses or receives a written or oral report alleging that a member of the university community has been subjected to or has committed an act of prohibited conduct must promptly report the allegations to the Equity Office. Members of the university community include students, faculty, staff, contractors, patients, visitors to campus, volunteers, regents and employees of affiliated entities. Because the university may have the ability to address or prevent future prohibited conduct, the obligation to report exists independently of whether the individual who was subjected to or accused of prohibited conduct is currently enrolled or employed at the university.
- The Responsible Employee is required to promptly report to the Equity Office, all known details about the alleged prohibited conduct including:
  - Name(s) of the person allegedly subjected to prohibited conduct:
  - ii. Name(s) of the person allegedly accused of prohibited conduct;
  - iii. Name(s) of any alleged witnesses; and
  - iv. Any other relevant facts, including the date, time, and specific location(s) of the alleged incident.

If the Responsible Employee is unable to provide this information at the time of making an initial report, but later becomes aware of additional information, the Responsible Employee must supplement the prior report.

Responsible Employees employed by university law enforcement are required to report pursuant to this section unless the information is otherwise excluded by state or federal law (e.g., information related to juveniles).

- c. In many instances, it may not be immediately apparent whether a person is a member of the university community, whether the alleged prohibited conduct occurred on university property, or whether the alleged prohibited conduct occurred in the course of an education program or activity of the university. Rather than conduct their own inquiries to determine whether these conditions exist, Responsible Employees should report potential prohibited conduct to the Equity Office to allow a preliminary inquiry to occur.
- d. Responsible Employees are not required to report information disclosed during an individual's participation as a subject in an Institutional Review Board-approved human subjects research protocol. Institutional Review Boards (IRB) may, in appropriate cases, require researchers to provide reporting information to all subjects of IRB Research.
- e. Responsible Employees who receive information related to prohibited conduct in the course of serving in the capacity as ombuds, as designated by the university, are not required to report to the Equity Office. Otherwise, as a confidential employee,

in the capacity as an ombuds, an employee must explain to an individual alleging prohibited conduct: (1) their status as a confidential employee for purposes of this Policy and that they are not Responsible Employees who report to the Equity Office; (2) how an individual may contact the Equity Office and make a complaint under this Policy; and (3) that the Equity Office may be able to offer and coordinate supportive measures, as well as initiate an informal or formal resolution process. These Responsible Employees must report alleged prohibited conduct disclosed to them when they are not serving in their capacity as ombuds.

- f. Responsible Employees who receive information related to an allegation of prohibited conduct in the course of providing professional services within a privileged relationship, such as healthcare providers or counselors, are not required to report to the Equity Office. As confidential employees, these employees must explain to an individual alleging prohibited conduct (1) their status as a confidential employee for purposes of this Policy and that they are not Responsible Employees who report to the Equity Office; (2) how an individual may contact the Equity Office and make a complaint under this Policy; and (3) that the Equity Office may be able to offer and coordinate supportive measures, as well as initiate an informal or formal resolution process. These Responsible Employees must report allegations of prohibited conduct disclosed to them when they are not providing professional services within a privileged relationship. These Responsible Employees may also have independent professional obligations to report some forms of criminal conduct to law enforcement officials.
- g. A Responsible Employee does not satisfy the reporting obligation by reporting allegations of prohibited conduct to a supervisor or university personnel other than the Equity Office.
- h. Responsible Employees are not required to report allegations of prohibited conduct to which they have been personally subjected to the Equity Office but are nonetheless encouraged to report.

#### 3. Other Employees:

- All employees who are not confidential employees (see section III.B.1) or Responsible Employees (see section III.C.2) must provide the following information to any person who discloses to them information about prohibited conduct: (1) the contact information of the Equity Office; and (2) information about how to make a complaint of prohibited conduct. When a person discloses a pregnancy or related condition to an employee, that employee must provide that person with the Title IX Coordinator's contact information and inform the person that the Title IX Coordinator can coordinate specific actions to ensure that person's equal access to the university's education programs or activities.
- Contact information for the Title IX Coordinator/Equity Offices and how to make a complaint is listed here: CU Denver | Anschutz (https://www.ucdenver.edu/offices/equity/resolution-options/)

#### 4. Employees who are designated Campus Security Authorities (CSAs):

 Employees who have additional obligations under the Clery Act to report certain criminal offenses under the law that occur on university property for statistical purposes. See this link for Clery resources and information: CU Denver | Anschutz (https://www.cuanschutz.edu/police/clery-act/)

#### IV. EQUITY OFFICE AND JURISDICTION

A. Designation and Responsibilities of the Equity Office

The Equity Office is responsible for overseeing complaints of prohibited conduct pursuant to this Policy and for identifying and addressing any patterns or systemic problems that arise during review of those complaints.

For all matters within the scope of this Policy, at a minimum, the Equity Office shall be specifically responsible and have delegated authority from the chancellor or president for implementing this Policy. Subject to the Equity Office's ultimate responsibility and authority, the Equity Office may further delegate responsibility and authority for the following functions:

- Providing notice of resolution procedures to parties and ensuring that complaints of prohibited conduct are handled appropriately and in a timely manner;
- Initiating and overseeing adequate, reliable, and impartial resolutions
  of complaints of prohibited conduct as appropriate and requested
  by the parties as applicable and ensuring that parties are treated
  equitably;
- Evaluating any request for privacy by a person allegedly subjected to prohibited conduct pursuant to section III.B.4 (override provision);
- Evaluating whether a complaint should be dismissed on jurisdictional bases pursuant to section IV.B;
- 5. Referring matters for further action or discipline for inappropriate or unprofessional conduct under other applicable policies or procedures even if a prohibited conduct violation is not found. No provision of this Policy shall be construed as a limitation upon the authority of the disciplinary authority, under applicable policies and procedures, to initiate disciplinary action;
- Offering and coordinating supportive measures for all parties either before or during the resolution process as applicable;
- Ensuring broad publication of the campus complaint process and procedures, including posting the process and procedures on an appropriate campus website;
- Creating an annual report documenting: (1) the number of reports
  or complaints of alleged violations of this Policy; (2) the categories
  (e.g., students, faculty, and staff) of parties involves; (3) the number
  of Policy violations found; (4) the number of appeals taken and the
  outcomes of those appeals; and (5) examples of sanctions imposed
  for Policy violations;
- Reviewing and confirming that the relevant policy statements of the campus Annual Security Report pursuant to the Clery Act are consistent with this Policy and campus complaint process and procedures; 1
- Ensuring there is ongoing training and education regarding reporting and preventing prohibited conduct for all students, faculty, and staff;
- Coordinating actions to prevent discrimination and ensure equal access for pregnant students, faculty and staff.
- 12. Ensuring that investigators and all decision-makers are thoroughly trained:
- 13. Maintaining records and related documentation of compliance with this Policy including, but not limited to, retaining copies of any training documentation, tracking student and employee training participation, documenting each step of the campus complaint process and procedures, including supportive measures and resolutions; and

**University Policies** 

- 14. Ensuring broad dissemination of the statement that the university shall not discriminate on the basis of sex in employment or in its education programs and activities.
- B. Equity Office's Jurisdiction to Conduct Preliminary Inquiry and Further Action
- 1. This Policy applies to all members of the university community, including students, faculty, staff, contractors, patients, volunteers, affiliated entities, regents, and other third parties. Subject to any rights of appeal, any person found responsible for engaging in prohibited conduct as defined in this Policy may be subject to disciplinary action, up to and including expulsion or termination of employment. The university will consider what potential actions should be taken, including contract termination or property exclusion, regarding thirdparty conduct alleged to have violated this Policy, but those options may be limited depending on the circumstances of the affiliation.
- 2. This Policy applies to conduct that occurs on campus. This Policy also applies to off-campus conduct, including online or electronic conduct, in the following circumstances:
  - a. If the person accused of prohibited conduct is affiliated with the university;
  - If the conduct occurred in the context of an employment or education program or activity of the university; or
  - c. In all other cases not falling under (a) or (b), the Equity Office will consider the degree of the university's control over the persons(s) accused of prohibited conduct, the relationship between the parties, the affiliation of the person allegedly subjected to prohibited conduct, and assess the surrounding circumstances of the alleged conduct for the presence of the following factors:
    - Targets or causes harm to an individual connected with the university;
    - Threatens violence against the person(s) allegedly subjected to prohibited conduct or others and there is reasonable fear that such further conduct could target or cause harm to someone connected with the university;
    - iii. Is of a violent nature or was frequent or severe;
    - iv. Prior or current similar complaints about the person(s) accused of prohibited conduct or the person(s) has a known history or record from a prior school indicating a history of violence;
    - Use of, or threat to use, a weapon, access to or attempts to access weapons, or a history of bringing weapons to the university;
    - Multiple persons allegedly subjected to prohibited conduct or persons accused of prohibited conduct.
    - vii. The person allegedly subjected to prohibited conduct is a minor;
    - viii. Whether the alleged prohibited conduct reveals a pattern of perpetration at a given location or by a particular group; and/ or
    - ix. Any other signs of predatory behavior.

If the Equity Office determines that at least one of the above factors is present, then the Equity Office may exercise jurisdiction for off-campus conduct that does not fall under (a) or (b) above.

The Equity Office is solely authorized to determine whether this Policy applies to alleged prohibited conduct and whether the university has jurisdiction to take any action pursuant to this Policy.

#### V. GRIEVANCE PROCESS AND PROCEDURES

Each campus shall establish written grievance procedures providing for prompt and equitable resolution of any allegations of prohibited conduct as follows: CU Denver | Anschutz (https://www.ucdenver.edu/offices/equity/university-policies-procedures/)

When an alleged violation of this Policy involves more than one University of Colorado campus, the campus with primary disciplinary authority over the person accused of prohibited conduct shall investigate the complaint pursuant to its applicable complaint process and procedures. The campus responsible for the investigation may request the involvement or cooperation of any other affected campus and should advise appropriate officials of the affected campus of the progress and results of the investigation.

#### VI. RECORDKEEPING

The university maintains the following records for at least seven years:

- A. For each complaint of prohibited conduct, records documenting the informal or formal resolution process.
- B. For each notification the Equity Office receives of information about conduct that reasonably may constitute prohibited conduct, records documenting the actions the university took to respond promptly and effectively.

See full policy here (Protected Class Nondiscrimination, APS Number 5065 (https://www.cu.edu/sites/default/files/aps/345143-aps-5065-protected-class-nondiscrimination/aps/5065.pdf)) or contact the Office of Equity:

The Office of Equity

Location: Education II North, Room 5221

Email: Equity@ucdenver.edu Phone: 303-315-2567

Address: 13120 E. 19th Avenue, Room 5221, Campus Box 187, Aurora

CO 80045

# Sexual Misconduct, Intimate Partner Violence, & Stalking Procedures (in accordance with Title IX)

The **Sexual Misconduct, Intimate Partner Violence, and Stalking** (*Sexual Misconduct Policy*) is designed to ensure equal access to the academic and professional experiences at the University of Colorado. This policy defines prohibited conduct and reporting obligations, as well as campus support services for involved parties.

It is critical to this commitment that anyone who may have been the target of or has experienced sexual misconduct feel free to report their concerns without fear of retaliation.

To foster a climate that encourages prevention and reporting of sexual misconduct, the university will engage in prevention efforts, educate the community, respond to all reports promptly, provide supportive measures when necessary to maintain the safety of the university environment, and recognize the inherent dignity of all individuals involved. The university shall provide fair and equitable processes to investigate and address complaints of sexual misconduct that provide fundamental due process.

Anyone who encounters an issue or seeks guidance related to this policy should consult with the Office of Equity. University employees who are mandatory reporters (**responsible employees**) must promptly report sexual misconduct as further outlined in the policy.

#### What is Sexual Misconduct?

Sexual misconduct is unwelcome behavior of a sexual nature or abuse in a sexual or dating relationship. It may include forms of sex discrimination. The university prohibits sex-based discrimination and harassment, including discrimination based on sex as defined by Title IX, discrimination based on sex that falls outside of Title IX, and other forms of sexual misconduct as defined by the Sexual Misconduct Policy. Any person who has experienced other forms of protected characteristic discrimination and harassment that does not constitute sexual misconduct should also report it to the campus Office of Equity. The university is committed to providing an environment where all individuals can study and work free from sex discrimination.

Sexual misconduct can occur in any of the following situations:

- · Between individuals of the same or different genders;
- · Between students, faculty, staff, and/or administrators;
- On and off campus, including, but not limited to the classroom, workplace, field work, internship sites, study abroad, professional conferences, or within any university educational program or activity; and/or
- Through social media, including, but not limited to X, Facebook, Instagram, Snapchat, Tumblr, and dating websites.

Sexual misconduct includes the following:

- · Sexual Assault
- · Dating Violence
- · Domestic Violence
- · Sexual Exploitation
- Stalking
- · Sexual Harassment

For a link the the full policy on Sexual Misconduct, Intimate Partner Violence, and Stalking, please visit the Office of Equity's website (https://www.ucdenver.edu/offices/equity/university-policies-procedures/#acsexual-misconduct-intimate-partner-violence-and-stalking-policy-1), or contact their office via the contact information below:

The Office of Equity

Location: Education II North, Room 5221

Email: Equity@ucdenver.edu Phone: 303-315-2567

Address: 13120 E. 19th Avenue, Room 5221, Campus Box 187, Aurora CO

80045

## **Smoke-Free and Tobacco-Free Environment**

In accordance with our mission, which commits in part to improving the health and well-being of Colorado and the world, the University of Colorado Denver and University of Colorado Anschutz Medical Campus will ensure a smoke-free and tobacco-free environment to protect the health of its faculty, staff, students and visitors at CU Anschutz and CU Denver.

#### **Purpose**

In order to promote health and wellness within the University community, it is the policy of CU Denver | CU Anschutz ("the university") that smoking or tobacco use of any kind is prohibited on any property or in any facilities at CU Anschutz and in any owned, leased, or occupied buildings on CU Denver. This policy is consistent with policies already in place for neighboring affiliates at both campuses, including University of Colorado Hospital, Children's Hospital Colorado and the Auraria Higher Education

All persons on CU Anschutz are prohibited from smoking products including, but not limited to, cigars, cigarettes, pipes or any device (e.g. e-cigarettes) or material which is lighted or inhaled. Smokeless tobacco products such as chewing tobacco or snuff are also prohibited. Smoking for the purpose of this policy shall include the use of e-cigarettes, electronic vaping devices, personal vaporizers, electronic nicotine delivery systems or such devices which vaporize substances to simulate smoking.

All persons on CU Denver are prohibited from smoking products including, but not limited to, cigars, cigarettes, pipes or any device (e.g. e-cigarettes) or material which is lighted or inhaled in any and all buildings owned, leased, or occupied by CU Denver, or within twenty-five (25) feet of any entrance, passageway, operable window, of ventilation system of any CU Denver owned, leased, or occupied building. Smokeless tobacco products such as chewing tobacco or snuff are also prohibited. Smoking for the purpose of this policy shall include the use of e-cigarettes, electronic vaping devices, personal vaporizers, electronic nicotine delivery systems or such devices which vaporize substances to simulate smoking.

#### **Implementation**

This policy will be distributed to the university community, made available on its website, presented during new student, faculty and staff orientation programs, and promoted using signage on the campus.

Individuals observed smoking or using tobacco products on CU Anschutz will be informed of the policy and asked to stop. Any individual observed smoking inside or within twenty-five (25) feet of any CU Denver owned, leased, or occupied building will be informed of the policy and asked to stop. Continued violation of the policy may result in disciplinary action, according to processes specific to faculty, staff and students.

For information or assistance with smoking cessation resources or implementation of this policy, please call Human Resources at 303-315-2717.

View full policy here: Smoke-Free and Tobacco-Free Environment, Policy Number 3059 (https://www.ucdenver.edu/docs/librariesprovider284/default-document-library/3000-general-admission/3059---smoke-free-and-tobacco-free-environment.pdf)

#### **Student Bill of Rights**

The University of Colorado Denver | Anschutz Medical Campus subscribes to the Student Bill of Rights as defined in 23-1-125 of the Colorado Revised Statutes (https://leg.colorado.gov/sites/default/files/images/olls/crs2023-title-23.pdf). The General Assembly finds that students enrolled in public institutions of higher education and students who are accepted to an institution of higher education have the following rights:

 Students should be able to complete their associate of arts and associate of science degree programs in no more than sixty credit

- hours or their baccalaureate programs in no more than one hundred twenty credit hours unless there are additional degree requirements recognized by the commission;
- A student can sign a two-year or four-year graduation agreement that formalizes a plan for that student to obtain a degree in two or four years, unless there are additional degree requirements recognized by the commission:
- Students have a right to clear and concise information concerning which courses must be completed successfully to complete their degrees;
- Students have a right to know which courses are transferable among the state public two-year and four-year institutions of higher education:
- Students, upon completion of core general education courses, regardless of the delivery method, should have those courses satisfy the core course requirements of all Colorado public institutions of higher education;
- Students have a right to know if courses from one or more public higher education institutions satisfy the students' degree requirements;
- A student's credit for the completion of the core requirements and core courses shall not expire for ten years from the date of initial enrollment and shall be transferrable.
- Students have a right to transparency of the cost of post secondary education programs, including information on fees, associated expenses, and financial aid in the form of scholarships, grants, and loans;
- 9. Students have the right to seamless transfer of courses in the guaranteed transfer pathway matrix, transparency in the process for transferring credits, a timely response on applications for transferring credits, and transparency in how and why a credit is accepted or rejected by an institution and how and why a credit is or is not applied toward degree requirements;
- Students have the right to appeal an institution's failure to accept the student's request for transfer credits; and
- Students have the right to know what work-related experiences or prior leaning opportunities are awarded postsecondary academic credit at the institution in which the student is enrolled, pursuant to section 23-5-145.5.

## **Student Immunization Requirements and Compliance**

This policy addresses immunization requirements for current and newly enrolled students at the University of Colorado Denver | Anschutz Medical Campus. The State of Colorado has established basic immunization requirements for students at institutions of higher education.

The Joint Commission (TJC), using standards established by the Centers for Disease Control (CDC), additionally mandates that all students in health-care professions whose training includes clinical settings and patient contact must present evidence of immunization for or immunity to an expanded list of communicable diseases. This policy describes the process for ensuring and certifying compliance with basic and expanded immunization requirements at the CU Denver and CU Anschutz campuses.

#### **Policy Statements**

 All continuing and newly enrolled CU Denver students (except those in Extended Studies) must comply with the basic immunization

- requirements as described in this policy. (See #4 for exceptions for online students.)
- Students enrolled in clinically based programs at CU Anschutz (listed in "Expanded Immunization" section below in #5) must comply with the expanded immunization certification requirements established by TJC and CDC.
- Students who do not comply with the immunization requirements described in this policy may not be allowed to enroll in succeeding terms and/or be assigned to clinical sites until the requirements are met.
- 4. Students enrolled exclusively in online courses or programs must meet the immunization requirement or (at their discretion) sign the exemption clause at the bottom of the Certificate of Immunization form. (See provision below regarding quarantines and forfeiture of tuition and fees if classes are being attended on campus.)
- Students required to meet the basic and expanded immunization requirements may be assessed a fee for immunization management services.
- 6. Student immunization records are protected information under the Family Educational Rights and Privacy Act (FERPA). Health information contained in some immunization records also may be protected information under the Health Insurance and Portability and Accountability Act (HIPAA). These records must, therefore, be stored and maintained in a secure manner.

## Basic Immunization Requirements for Enrolled Students at CU Denver and Non-Clinical Graduate Students at CU Anschutz

- All regular enrolled students at CU Denver are required to provide the following documentation by the posted due dates (e.g., November 1 if matriculating in summer or fall terms and March 1 if matriculating in spring term). All regular newly enrolled CU Denver students must comply with these basic immunization requirements.
  - a. Signed Meningococcal Disease Information Form
  - b. Signed Tuberculosis Screening (Risk Assessment) Form and any additional tests and x-rays required by the health professional who reviews the Tuberculosis Screening form
  - c. Proof of Immunization
  - d. Immunization Form
- Other degree, non-degree, and certificate students in non-clinical programs at the Anschutz campus may be required to meet the expanded immunization/immunity policy of their program administrators to fulfill student, programmatic, and community health care needs.
- Students born after January 1, 1957 must provide documented proof that they have received two rubeola (measles), two rubella (German measles), and two mumps vaccinations OR two combination MMR vaccinations (measles, mumps, and rubella).
- Students born before January 1, 1957 must provide documented proof that they have received one rubeola (measles), one rubella (German measles), and one mumps vaccination OR one combination MMR vaccination (measles, mumps, and rubella).
- 5. Options for submitting the required proof of immunization or immunity may include: Certificate of Immunization signed by a physician, nurse, or school authority. Copy of medical records from a physician that outlines a student's immunization history. Proof of personal history of measles, mumps, and rubella verified

- through blood titer tests. Official International "Yellow" Certificate of Immunization.
- 6. Hepatitis B and meningitis vaccines are strongly recommended but not required for CU Denver | CU Anschutz students subject to the basic requirements. In the future these or other forms of vaccination may be required along with MMR immunization and TB screening.
- 7. Self-identified medical, religious, and personal exemptions to the requirements are allowed by law. Students who submit exemptions on the Certificate of Immunization form are subject to the prevailing state regulations governing quarantines in case of outbreaks and university policies related to forfeiture of tuition and fees.
- The management of immunization/immunity requirements and compliance will be carried out by campus-based immunization services or outside contracted agencies (e.g., Health Center at Auraria) in a manner best suited to campus needs and resources.
- 9. CU Anschutz students enrolled in non-clinical master's and doctoral Graduate School degree programs are also required to meet the "basic" immunization requirements described above, with the exception of the Meningococcal Disease Information Form, which is recommended but not required.

## Expanded Immunization Requirements for Graduate and Health Professions Students Enrolled in Clinically Based Programs at CU Anschutz

- All students entering clinically-based health care training programs at CU Anschutz have been and will continue to be required to submit documented proof of TB testing and immunization for or immunity to an expanded list of infectious diseases prior to matriculation and the start of their first term. (NOTE: The TB Screening / Risk Assessment Form is not required in addition to the required testing.)
- 2. The diseases for which immunization or immunity must be documented are described in guidelines issued and periodically revised by the CDC and mandated prior to patient contact by TJC. Diseases covered have included measles, mumps, and rubella (MMR), chicken pox (varicella), polio, hepatitis B, and diphtheria, tetanus, and pertussis (DTaP or Tdap) and may include emergent ones in the future. Annual tuberculin skin testing also is mandatory for all continuing students enrolled in clinical programs and who have not previously tested positive.
- Influenza vaccines are strongly recommended annually for all those involved in clinical health care training and delivery. Individual programs may, at their option, require annual influenza vaccinations for their students. The Meningococcal Disease Information Form is recommended but not required.
- Options for submitting the required proof of immunization or immunity may include those listed above, but specific requirements may vary by program.
- 5. Clinically-based health care professions programs administered at CU Anschutz include: Medicine; Pharmacy (traditional and non-traditional); Dental Medicine (including the international and certificate programs); Nursing; Physical Therapy; Child Health Associate- Physician Assistant; Genetic Counseling (Graduate School), and any other clinically-based programs or courses involving patient contact (e.g., certain practicum courses in Colorado School of Public Health programs).

- 6. CU Anschutz school and college programs are responsible for. Updating the Immunization Certification Form when new CDC guidelines are issued; Informing new students of the immunization requirements and distributing the certification form (hard copy or electronic format) in admissions materials; Setting deadlines for submitting the completed forms—typically prior to matriculation but no later than the end of the student's first semester; Reviewing the submitted immunization forms and following up with non- compliant students; Monitoring annual TB testing if required of continuing students.
- 7. The management of immunization/immunity requirements and compliance at CU Anschutz will be carried out by individual program staff or a centralized immunization services office or outside contracted reviewer(s) in a manner best suited to program guidelines and campus and program resources.
- 8. Students who do not meet posted deadlines for submitting certification forms and completing any other requirements (e.g., annual TB testing) in a timely fashion will not be allowed to register in their first and/or subsequent term and/or be assigned to clinical settings and responsibilities until the required information has been submitted. A penalty fee may be assessed for processing health holds.
- 9. Each school or college program with students assigned to clinical settings will determine and monitor if and when new or continuing students need other medical tests, procedures, or equipment to meet compliance requirements related to their training (e.g., annual TB tests, CPR, TB mask fit, etc.). Unless otherwise arranged, students are responsible for obtaining and paying for those medical services not covered by their insurance plans.
- 10. Clinical training program students in all years of their studies are responsible for complying with immunization regulations and supplying (if requested) to affiliated health care facilities any records of their physical examinations, immunization status, and other medical tests and other forms of required documentation (related to, for instance OSHA, HIPAA, and TJC requirements).

## Student Right to Know and Disclosure Information

As a prospective or continuing student at the University of Colorado Denver | Anschutz Medical Campus you have a right to certain information that the university is required by law to provide. Much of that information is safety related or financial in nature, but other broad categories are included such as graduation rates and the various costs associated with attending CU Denver | Anschutz.

Current federal regulations require that institutions of higher education disclose such information and make it readily available to current and prospective students. The Higher Education Opportunity Act of 2008 requires institutions to provide a list of the information to which students are entitled with instructions on who to contact to obtain more information.

Please review your respective campus Student Right to Know webpage for more information.

**Denver Campus Student Right to Know website:** https://www.ucdenver.edu/student/records/policies/right-to-know (https://www.ucdenver.edu/student/records/policies/right-to-know/)

Anschutz Medical Campus Student Right to Know website: https://www.cuanschutz.edu/student/resources/right-to-know (https://www.cuanschutz.edu/student/resources/right-to-know/)