

STUDENT HANDBOOK

*Policies, Procedures, and Information for Students of
The Institute for Clinical Social Work*



Institute for Clinical Social Work

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The Institute for Clinical Social Work Student Handbook sets forth expectations, procedures, processes and responsibilities relevant to students of the Institute for Clinical Social Work (ICSW); it is not to be regarded as a contract between any student and ICSW. ICSW expressly reserves the right to make changes to its written policies, rules, and regulations at any time, with or without prior notice. Please visit icsw.edu/studenthandbook for the most up-to-date version of this Student Handbook.

Mission

The mission of the Institute for Clinical Social Work, an institution of higher education, is to prepare scholars and practitioners to advance the knowledge and quality of practice in the fields of clinical social work and counseling and to serve diverse communities through professional and academic contributions.

Vision

As a highly-respected institute, to become well-known for diverse and accessible psychodynamic educational programming.

Values

In keeping with our roots in social work and our commitment to social justice, we develop psychodynamically informed professionals who recognize and celebrate diversity, practice compassionately, and have the knowledge and skills to empower people to lead meaningful lives.

Diversity Statement

The Institute for Clinical Social Work is an Affirmative Action/Equal Opportunity Employer. The Institution does not discriminate in access to its educational programs and activities, or with respect to hiring or the terms and conditions of employment, on the basis of race, color, national origin, religion, sex, gender identity and expression, political affiliation, age, disability, veteran status, genetic information or sexual orientation.

Welcome

Dear Students:

Welcome to the Institute for Clinical Social Work! As the Institute for Clinical Social Work's eighth president, it is my pleasure to greet you.

Personal growth, professional education, and career development are important aspects of the student experience. For over forty years, the Institute for Clinical Social Work has been committed to preparing scholars and practitioners to advance knowledge and quality of practice in the fields of clinical social work and clinical counseling and psychotherapy. Throughout our history, great strides have been made at the Institute for Clinical Social Work in the areas of student success, expanding academic programs, increasing access to psychodynamic training through community partnerships, and offering advanced training through continuing education and advanced certification programs.

As a student, you are the heart of our academic community. I want you to know that we are committed to continuous improvement through fulfilling our mission and living up to our core values of social justice, diversity, compassionate practice, and empowering people to live meaningful lives.

As a member of this community, you are a part of an institution founded by educational pioneers in psychodynamic programming and clinical social work. As a leader in psychodynamic graduate studies, it is important that you have a positive student experience while pursuing your graduate degree. Recent student and alumni surveys indicate that student satisfaction, graduation rates, job placement, and licensure post-graduation remain high. We will continue to prioritize the student experience by providing intimate classroom settings, ongoing mentorship throughout your program of study, and providing access to workshops and trainings that enhance your in-class learning experiences. Additionally, we are committed to ensuring that all master-level students have a field placement each semester and that all doctoral candidates receive personal mentoring. These aforementioned programmatic components and institutional commitments are what contribute to the unique and meaningful student experiences in our graduate programs.

The entire faculty and staff wish you the most rewarding academic experience in route to earning your MA or PhD. I encourage you to take full advantage of all of the opportunities available to you during your academic career at the Institute for Clinical Social Work. I am extremely honored to serve as your president. If I can be of any assistance to you feel free to reach out to me in the office of the president, via e-mail, or telephone.

Sincerely,
Dr. Michelle Curtain Stewart
President



Table of Contents

Section 1: Academic Policies and Procedures	6
Academic Advising and Support.....	6
Academic Standards	6
Accommodations.....	13
Admissions Policy	13
Attendance Policy.....	14
Audit Policy	14
Commitment to Free Expression and The Free Exchange of Ideas at ICSW	15
Continuing Education Program.....	17
Distance Learning Policies	17
Return of Title IV (R2T4) Policy	18
Drop/Withdrawal Policy.....	18
Financial Holds/Administrative Leave of Absence Policy	20
Leave of Absence Policy	20
Registration Policies & Procedures	21
Satisfactory Academic Progress.....	21
Status Change Policies & Procedures	22
Student At Large Program	23
Student Evaluation and Grades	23
Transfer Credit Policy.....	24
Section 2: General Policies and Procedures	26
Active Duty and Public Health Service Students	26
Collection Policy.....	26
Email Use Policy.....	26
Fee Schedule	27
Financial Aid Timeline	27
Fraud Prevention and Protection Program.....	28
Grievance Policy	28
Non-Discrimination Policy	32
Respect for Diversity and Inclusion	32
Retention of Data Policy.....	33
Sexual Misconduct Policy and Complaint Resolution Procedures	33
Drug-Free Campus.....	72
Student Records – FERPA	72
Whistleblower Policy.....	78
Section 3: Master’s Program Requirements	79
MA Program Components Timeline	79
Master’s Case Presentation	79
Clinical Practicum.....	79
Comprehensive Examination	80
Field Placement	80
Section 4: PhD Program Requirements	84
PhD Program Components Timeline.....	84
PhD Case Presentation	84
Clinical Practicum.....	88
Dissertation Process & Procedures	90
Qualifying Theory Exam	97

Section 1: Academic Policies and Procedures

Academic Advising and Support

Several components of the program are organized to provide advisory resources to students as they progress through the program. The central advisory resources include the student's advisor and the Academic Dean.

Advisor: PhD

A faculty advisor is assigned to all students at the point of matriculation. This person will serve as the central academic advisor for each doctoral student and is available to the student throughout the program until the point at which the student has an approved dissertation Chair. The advisor is assigned jointly by the Chair of the Clinical Practicum and the Academic Dean, who are also responsible for making any changes in advisor.

Advisor responsibilities include:

1. Providing consultation for Clinical Practicum I and II.
2. Meeting with the student advisee once per semester throughout the program, until the student has an approved dissertation chair.
3. Staying abreast of the most current academic and practicum policies.
4. Serving as the point person for academic, practicum or research concerns on the part of the student as well as faculty or administration. If a class instructor, or consultant, has a concern about a student, the advisor may be the first point of contact about that concern.
5. Serving as a support person for the student in cases where the student encounters problems in progression. The advisor, as such, is expected to attend meetings at which the student's progression is being evaluated.

Advisor: MA

The Associate Director of Academic Affairs serves as the primary advisor for all Master's Program students. This advisor is ordinarily the first person to contact with any questions, concerns, and problems related to the program. The advisor is the first contact for faculty with concerns about a student. The advisor formally monitors students' progression through the program. In addition, the Clinical Practicum Chair and administration work together to assign a faculty member to each Master's student who serves as a consultant to that student throughout their time in the MA program.

Academic Standards

ICSW's academic standards reflect respect for students' integrity while also clarifying the expectations and standards for academic training at a masters and doctoral level. Achieving this level of training may stretch a student's capacities and when a student experiences any academic challenges, they are encouraged to engage with their advisor, other faculty, or any relevant campus resources. ICSW's goal as an educational institution is to help mentor student learning and create an environment for student success. When challenges occur, several resources are in place to help.

At the start of their program, students will complete a self-assessment of their learning to highlight their strengths and challenges to better support them as they move through the program. Academic Advisors will review this profile and decide with their advisee if and how to share this information with their professors. Any recommendations from the Admissions Committee will also be included in the student

profile. Advisors and students will collaborate to raise awareness of areas where the student might need additional support.

Academic Standing

Academic standing applies to all degree seeking students at ICSW. Students are in academic good standing and remain so by maintaining a grade point average of 3.0 or above, and by not receiving any failing grade. If a student is experiencing difficulty retaining this level of academic standing, they are encouraged to speak with their advisor and any other resources within the school to see what supports or accommodations may be helpful and/or necessary. If a student is unable to maintain academic good standing, they will be placed on academic probation and will work with their academic advisor about how to best provide support for them. ICSW's goal as an educational institution is to help mentor student learning and create an environment for student success. When challenges occur, several resources are in place to help.

Academic Probation

A student is automatically placed on academic probation if:

- a. Their cumulative grade point average falls below 3.0
- b. They receive a failing grade (students will be required to retake the course in which they received the failing grade.)

To support students' academic progress, their academic standing is reviewed each semester to ensure they are managing ICSW's academic expectations. This evaluation is conducted by the Registrar and Director of Academic Services. When a student seems to be having academic difficulty in the program as evidenced by their grades, their advisor will be alerted, and the student will receive a written notification. A meeting with their advisor will be scheduled to start a process of identifying what support they need to be more successful. Working with their advisor, a plan will be developed to help the student continue their academics in good standing. This plan will be coordinated through the Academic Affairs office, in collaboration with the student and advisor, to ensure its effectiveness. During this process, a student's registration is on hold until a plan is developed and approved by the Academic Dean as a way of ensuring the student is prepared/supported to continue their studies. Once approved the student can register for future courses and move forward with their case presentation, the QTE or their dissertation once they return to academic good standing. The Academic Dean will also inform the Progression Committee and consult with them as appropriate.

To return to academic good standing, the student must improve their cumulative grade point average to above a 3.0, and receive a non-failing grade of the course they were required to retake, if applicable.

Students who are unable to use the support provided to return to academic good standing will be referred to the Progression Committee to better assess the issues at hand and whether ICSW is the right academic fit for the student. Guidelines for referral to the Progression Committee include, but are not limited to, being on academic probation when their grades remain below a 3.0 for two academic semesters, or if they failed a class. The Progression Committee will work with the student, their advisor and relevant faculty and support, to develop a plan to address the area(s) of concern. If a student is not able to regain academic good standing using these supports, they may be at risk of dismissal from the program or conversion to a different ICSW program.

Academic Code of Conduct

The Institute for Clinical Social Work's mission is to prepare clinician scholars and practitioners who are highly trained, professional, and demonstrate personal and academic integrity in all areas of their work.

Academic Integrity

Academic integrity is a cornerstone of learning at ICSW. Integrity is foundational to being a scholar as well as being a clinician. When academic integrity concerns arise, they may be in the areas identified below, but are not limited to these areas:

- a. Plagiarism (see below), including representing any work of another person, including materials from the professional literature, as one's own words or creation, product and achievement
- b. Misrepresentation of interactions with clients in written or oral presentations; representing interactions with clients that did not happen; or presentation of untrue statements in one's academic or clinical work, with the exception of disguising confidential information for the purpose of protecting the client's privacy
- c. Fabrication of data or citations
- d. Failing to adhere to the guidelines agreed upon with the committee on Human Subjects Research in projects or dissertations
- e. Falsification of records, including transcripts, evaluations, and letters of recommendation
- f. Cheating on an examination or assignment, including stealing examination/assignment information before it is given, unauthorized communication during an examination, and any other violation of the rules given regarding the examination/assignment

Plagiarism

Plagiarism defined: "Plagiarism takes many forms but falls into three main categories: using a source's language without quoting, using information from a source without attribution, and paraphrasing a source in a form that stays too close to the original" (Yale Writing Center, 2014). Students may plagiarize without intent or knowing that they did so. Students are encouraged to make use of the writing resources, including Writing Coach Millie Rey and Purdue's OWL Center. Students are encouraged to upload drafts of their work to Turnitin, a plagiarism detection tool available to all students. Additionally, there are several online resources to utilize for more information about plagiarism, including how to avoid it. One such resource is <https://apastyle.apa.org/style-grammar-guidelines/citations/plagiarism>. If students have any questions about what constitutes plagiarism, they should discuss with their faculty member.

Students may quote from their own earlier work, subject to the same rules of citation that govern all academic writing. Additionally, students may not reuse the same assignment content to fulfill different course requirements. If a student wants to submit a paper for a course that is closely related to a paper submitted for another course, the student should first speak to their faculty member about it. If the faculty member allows the submission, the student should correctly cite the first paper.

Egregious and non-egregious misconduct/plagiarism

It is important for students to understand when violations of the academic code of conduct reach significant levels of severity. In general, egregious acts are ones in which a student knowingly acts in extreme misconduct. Egregious misconduct may include, but is not limited to, copying, and pasting another person's work and claiming it as one's own; having another person write a paper on one's behalf; or cheating on an examination. Non-egregious misconduct may include, but is not limited to, referencing an incorrect or nonexistent source, duplicating one's own work, or paraphrasing without citing.

Procedure for handling incidences of academic misconduct/plagiarism

When a faculty member is concerned about a possible question of academic integrity, they will contact the student to discuss their concerns as soon as possible. Based on that discussion, particularly as it relates to the context and details of the situation, the faculty member will make a professional judgment whether they engaged in academic misconduct/plagiarism. The faculty member will decide on next steps as it relates to the class, which could include a warning, failure of the assignment, a lowered grade on an assignment, or failure of the class. Faculty, after letting the student know their determination, will email the student with their determination and copy their academic advisor and the Academic Dean. The faculty member will also make a recommendation to the Academic Dean of their determination whether the academic misconduct/plagiarism was egregious or non-egregious.

When a faculty member determines that there has been a violation of the academic code of conduct, the student is encouraged to engage with and ask questions of the faculty member to ensure they understand the determination and has the tools to avoid similar issues in the future. If a student engages in academic misconduct/plagiarism, whether egregious or non-egregious, the Academic Dean will decide on a possible referral to the Progression committee.

Note on Artificial Intelligence

The use of Artificial Intelligence (AI) in support of one's learning and writing is a dynamic issue that is continually reviewed as this technology continues to evolve. Decisions about how AI can be incorporated into classwork are determined by each instructor (upon approval by the Academic Dean). While AI is potentially a powerful tool, faculty and students need to critically examine its limitations, including the potential for bias and misinformation, as well the need for accountability to ICSW's standards of scholarship and academic integrity. Ultimately, human input and feedback are crucial elements of one's academic work. While AI may serve to assist, it should not be a replacement for original thoughts and writing. If students use AI, they are asked to please let their faculty member know how they are using it so we can continue to understand and refine our use of this new technology.

Masters Program Field placement expectations and standards

Performance Issues and conflicts in the field

At times, problems arise in professional settings that require additional attention to resolve. Field instructors and students should follow the process described below when trying to resolve areas of conflict or concern. Note: At no point are students permitted to decide autonomously to leave a placement or to stop attendance at a placement; doing so violates an agreement that ICSW has made with the training site and is a breach of our contract. Leaving a placement without approval may trigger a referral to the Progression committee. If a student desires to alter or terminate the placement early, they need to contact the Field Liaison and discuss their reasons for changing placement. Any decision will be made in

collaboration with the Associate Director of Academic Affairs, the practicum site, and ICSW administration, and ultimately requires administrative approval.

1. As part of the supervisory and educational process, any concerns or conflicts should be addressed directly between the field instructor and student.
2. If the conflict is not resolved in supervision, the field instructor or student can request a meeting with the Associate Director of Academic Affairs. The Associate Director of Academic Affairs, in consultation with the Academic Dean, will attempt to clarify problem areas, explore solutions, and work toward a mutually agreed upon plan.
3. If the conflict is not resolved with the Field Liaison, the field instructor or student may request a meeting with ICSW's Academic Dean to further address the situation.

Academic Dismissal

There may be times that despite a student's best efforts and their use of ICSW's supports, the student is not able to maintain the academic standards that are required for the ICSW program degrees. The following are potential grounds for academic dismissal:

- a. The student on Academic Probation fails to meet the conditions after two academic semesters of being placed on probation for not improving their GPA to above 3.0
- b. The student on Academic Probation fails the same course for a second time
- c. The student in the PhD program does not pass the case presentation after two attempts or does not pass the Qualifying Theory exam after two attempts
- d. The student in the Master's program does not pass the case presentation after two attempts or does not pass the comprehensive exam after two attempts
- e. The student violates the National Association of Social Workers (NASW) Code of Ethics or the American Counseling Association (ACA) Code of Ethics

If any of the above conditions occur, the context and details will be reviewed by the Academic Dean, who will consult and collaborate with other relevant stakeholders as appropriate, and the Academic Dean will determine if a referral to the Progression committee is indicated. If so, the student will be given an opportunity to address the concerns in a Progression hearing. Please see the information below on Progression hearings. This hearing, which includes the student and a support member if desired, will decide if any additional steps or supports need to be put in place, or if the student's enrollment status will be changed (i.e. probation, suspension, dismissal). If a student is dismissed, this event will be recorded on a student's official transcript.

Note: only change of enrollment status (i.e. dismissal) will be notated on a student's official transcript. Any other documentation regarding a student's academic progress will be placed in the student's file, but not noted on their official transcript.

Academic Concerns

If a faculty member (in the role of instructor, consultant, dissertation chair, or dissertation committee member) has a concern about a student's academic and/or clinical performance, the faculty member should attempt to address the concern directly with the student, as part of the learning and educational process. Concerns may include issues of decreased attendance or frequent late attendance, dropping grades or consistently poor grades, difficulty either in understanding or communicating clinical or academic material, etc. The faculty member is also encouraged to inform the student's academic advisor to help to ensure the student's support network is engaged with the process and that the student has the support they need.

There may be times that the situation cannot be resolved directly between the faculty and student. If this is the case, the student and their assigned advisor will discuss the situation and determine next steps. This may include a meeting with the student, assigned advisor, faculty member, and Academic Dean. If such a meeting occurs, the goal is to discuss the concern and develop a plan for moving forward. Special attention will be made to better understand what is influencing the concern. The group will collaboratively develop a problem resolution plan, utilizing any relevant ICSW supports. The plan will articulate any steps to be taken and who is responsible for completing the steps. Once a plan is agreed upon, the signed plan will be submitted to the Academic Dean and placed in the student's academic file for reference. If the student is unable to follow through on the plan, using ICSW supports and resources, there may be a referral to the Progression committee for a hearing, in which the student and the members of the Progression Committee discuss the situation. The Progression Committee will then determine next steps.

Progression Committee

The purpose of the Progression Committee is to oversee the plans and supports when there are concerns or questions about students' academic and clinical performance (MA students) and academic performance (PhD students) and plan progression, once the Academic Dean makes the referral. The Academic Dean and the Chair of Progression will maintain open lines of communications about students with academic concerns that may result in a referral to Progression. The Committee's members may include, but are not limited to, the Chair of Progression, Interim Associate Director of Academic Affairs, Dean of Students, Registrar and Director of Academic Services, three faculty members, and whenever possible, a student representative. The Progression Committee's duties are as follows:

- 1) Review and recommend academic standards policies
- 2) Serve in an advising capacity to the Academic Dean around issues related to students' progression in their academic program
- 3) Conduct Progression hearings

Progression Hearing

When the Academic Dean determines a situation should be referred to the Progression committee, the Progression Chair should inform the student that they have been referred to the Progression Committee for a hearing.

To help ensure educational, fair, and clear processes, the following steps will be taken when a hearing is called. First, the Progression Chair will provide the student with the following information:

- 1) The date, time, and location of the hearing, providing the student with appropriate notice, typically 10 business days.
- 2) A summary of the academic and/or clinical issue or concern that led to the hearing.
- 3) The names of the individuals who will be present at the hearing, including the members of the Progression committee. Also in attendance should be the student's academic advisor (MA program) or the student's advisor and/or consultant (PhD program).
- 4) A notice that the student may elect to be accompanied by a personal support person and can discuss the situation with the student privately in a non-legal capacity. If the student decides to have a support person present, the student should notify the Progression Chair of their presence and relationship to the student in advance of the student's hearing.
- 5) The student is encouraged to write a response to their referral to progression, outlining their view of the issue and providing any relevant documentation. The Progression Chair will let the student know the timeframe for when this documentation should be submitted to them, typically at least five business days prior to the scheduled hearing so the meeting participants can thoughtfully review this material. This is not a requirement, and it is up to the student whether they would like to submit this material.
- 6) Academic advisors can submit a summary of the events that have led to the hearing, as appropriate, according to a time frame set by the Progression Chair. Materials need to be submitted at least five business days prior to the hearing so committee members have time to review them. This summary will be disseminated to the individuals who will be present at the hearing (less the student's support person, if they have elected to be accompanied by one.)

At the hearing, the chair will review the issue/concern for the Committee and present any relevant materials. The student is invited to make a statement and/or respond to any issue/concern they believe is relevant. Committee members can ask the student follow up questions to clarify their questions. Other attendees are welcome to make a statement if the student agrees. After the group has discussed the situation, the chair will excuse the student (and their support person, if they have elected to be accompanied by one, and any other non-committee members).

The Progression committee will then discuss whether the concerns can be remedied with additional supports and/or whether student's enrollment status needs to be changed. The outcome of the Progression hearing may fall into one of two categories:

- 1) Consultation and Remediation: When remediation is possible and desirable, the Progression committee shall develop a remediation/support plan. The plan will be reviewed with the student, their advisor or consultant, and the Chair of the Progression committee. Progression plans include a timeline to follow up and evaluate the student's progress.
- 2) Status Disposition: The student's performance and remedial actions will be formally assessed by the Progression committee, to determine the student's status at ICSW. The outcome of the hearing may include suspension from the program or dismissal from the program.

The student will be informed of the committee's decision in writing by the Progression committee Chair within three days. The Chair will also notify the Academic Dean.

The student has a right to appeal the decision of the Progression committee to the Academic Dean for if the student has documented reason to believe the progression process outlined above has not been followed and/or the process was based on factual errors. The student must appeal the decision of the

Progression committee within 10 business days. The Academic Dean shall review the student's file and then meet with the student. The decision of the Academic Dean shall be considered final.

Accommodations

Students with special needs or difficulties in learning and completing course assignments are strongly encouraged to notify instructors as soon as possible so that appropriate resources and accommodations can be provided. Students are also encouraged to contact the Disability Services Coordinator for their academic program. The Dean of Students serves as Disabilities Coordinator for both the PhD and Master's programs. The Disability Coordinator retains and documents all requests made by students for accommodation.

Admissions Policy

Admissions Procedures

The Associate Director of Admissions and Enrollment Management serves as the chair of the Admissions Committee, which includes the Academic Dean, Director of Student and Academic Affairs (non-voting members), and faculty members who review applications and makes admission decisions. The Academic Dean has the authority to veto an admissions decision. Currently, the Institute for Clinical Social Work has rolling admissions. Applicants are notified of their admissions status shortly after the final phase of the application process.

False Information

Any applicant to the Institute for Clinical Social Work's academic degree programs or a student in the program who fraudulently, or through misrepresentation, makes false statements on his or her application for admission, or falsifies their degrees or professional credentials shall be subject to dismissal from the program.

Notice of Non-Discrimination

The Institute for Clinical Social Work does not discriminate based on sex in its educational programs or services or in the context of employment or admissions. Sexual misconduct, including sexual harassment as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides that:

Minimum Admission Requirements – PhD in Clinical Social Work

For consideration for the PhD program (onsite and distance) include:

- A master's degree from an accredited graduate school of social work, counseling psychology, or a master's degree in a closely related field.
- Graduate program grade point average of 3.0 on a 4.0 scale.
- Personal therapy experience is not required as a prerequisite for admission, though such experience is favorably considered.

- At least baseline licensure in the State where you practice (i.e., LSW, LCP, etc.) by the time ICSW classes begin; applicants without baseline licensure may be admitted on the condition that they receive baseline licensure by the start of classes. Once classes begin, we expect students with baseline licensure to be working actively toward receiving terminal licensure (i.e., LCSW, LCPC), following their state's guidelines regarding clinical supervision.
- An active weekly clinical caseload; ICSW doctoral students need to discuss their clinical work regularly, both in class and in consultation with members of the faculty, which will help prepare them for a clinical social work job.

Minimum Admission Requirements – Master’s in Clinical Counseling & Psychotherapy

For consideration for the master's program (onsite and distance) include:

- Bachelor’s degree from an accredited college or university — degree need not be in psychology or social work
- Minimum 3.0 GPA at all institutions of higher education
- GRE is not required

Attendance Policy

Students are required to attend all class sessions. The intimacy and intensity of our classroom environments make consistent attendance very important. If a student must miss a class, it is their responsibility to inform the instructor of the anticipated absence in advance. Students who are absent will be responsible for the work that they missed and should consult their instructor to make arrangements. If the work is not made up to the instructor’s satisfaction, the overall grade for the course may be lowered one level. **For PhD students, more than one absence may result in either a withdrawal from the class or a failing grade. For master’s students, more than two absences may result in either a withdrawal from the class or a failing grade.** Instructors should inform the Academic Dean if there are concerns about a student’s attendance. In extenuating circumstances where the student is forced to miss more than one PhD class or two MA classes, special consideration may be given and a plan of remediation may be developed with the student’s instructor and Academic Dean. *(Revised by Curriculum Committee on 2/28/20.)*

If extenuating circumstances result in ICSW cancelling classes, the Registrar and Director of Academic Services will work with faculty to reschedule.

Audit Policy

ICSW students and alumni are eligible to audit any class that is offered within their program, with the instructor’s permission. Charges for auditing depend on the status of the person making the request.

Status	Charge
Student	Free
Advanced PhD Candidate	\$250
Alumni	\$500
Full Faculty	Free
Instructor	\$250
Other	\$750

Students in a different ICSW program may audit any class that is offered with both the Dean’s consent and

with the instructor's permission. The charge for auditing will be \$750 per class.

Commitment to Free Expression and The Free Exchange of Ideas at ICSW

The purpose of this policy is to protect and enhance the free exchange of ideas, the right to free expression at ICSW, subject to limitations on unlawful/unprotected speech and to clearly stated, reasonable, and nondiscriminatory rules regarding time, place, and manner. All persons on the ICSW campus, including members of the ICSW community and visitors or guests, are protected by and subject to freedom of speech laws and this policy. In permitting the exercise of free speech, ICSW does not sponsor or sanction the messages stated or the methods of speech used, unless expressly stated otherwise.

I. ICSW General Policy and Scope of the Policy

Free expression and the free exchange of ideas are central to the goals of a teaching institution, and certainly central to ICSW's core mission. As such, ICSW is committed to protecting and enhancing the free exchange of ideas, including artistic expression, subject to limitations on unlawful/unprotected speech and also to clearly stated, reasonable, and nondiscriminatory rules regarding time, place, and manner (as described in Section II below). All persons on the ICSW campus, including members of the ICSW community and visitors or guests, are protected by and subject to this policy as further set forth below. In permitting the exercise of free expression, ICSW does not sponsor or sanction the messages stated or the methods of speech used, unless expressly stated otherwise.

This policy applies to the free exchange of ideas in the classroom. Discussion and expression of all views relevant to the subject matter of a class, even if those views are unpopular, are recognized as central to the educational process. Faculty will evaluate students solely on academic bases reasonably related to legitimate pedagogical concerns, and not on student opinions or conduct unrelated to the academic standards of a course. A faculty member also enjoys the right to exercise free expression in their capacity as a citizen, and ICSW will not review such expressions of ideas or viewpoints except in the rare circumstance in which such communications seriously undermine the faculty member's fitness to serve the ICSW community.

II. Limitations

Nothing in this policy shall be construed as protecting, authorizing, or condoning the following unlawful or otherwise unprotected speech: (a) obscenity; (b) child pornography; (c) defamation; (d) speech that by its very utterance tends to incite an immediate breach of the peace by the hearer; (e) speech that incites or produces imminent lawless action and that is likely to incite or produce such action; (f) speech that creates a hostile environment within the meaning of Title IX of the Educational Amendments of 1972, Title VII of the Civil Rights Act of 1964, or other applicable civil or human rights laws; (g) speech that substantially disrupts, obstructs, or interferes with classes, teaching, the use of offices, or other activities related to teaching, administration, or operations of ICSW; (h) speech that damages ICSW or the private property of any other entity or individual; or (i) speech that discloses the confidential, private, or proprietary information of ICSW or others without appropriate authorization. In addition, faculty members have the right to limit classroom discussion and topics of discussion to those deemed reasonably related to the subject matter of the class. Student rights to free expression do not include impinging on the ability of instructors to teach or the rights of other students to learn, and neither faculty members nor ICSW will permit interference with or disruption of classes.

Students or employees who violate this policy or its referenced procedures are subject to ICSW discipline, up to and including dismissal from the institution or employment. All persons who violate this policy may also be directed to leave campus, may be barred from campus, and may be subject to criminal trespass laws in the event of failure to comply.

III. Relationship of Free Expression to Academic Freedom

In addition to promoting free expression, ICSW recognizes the distinct right to academic freedom enjoyed by ICSW faculty. Academic freedom describes a set of rights relating to teaching, research, and speech undertaken as a private citizen. The parameters of ICSW's Academic Freedom Policy are described in the Articles of Academic Governance.

For purposes of this Policy, it is important to note that a faculty member enjoys a broad freedom to exercise free expression in his or her capacity as a citizen. ICSW will not review such expressions of ideas or viewpoints except in the rare circumstance in which such expressions or viewpoints seriously undermine the faculty member's fitness to serve the ICSW community. In such circumstances, any such review will be conducted pursuant to, and discipline will be preceded by, appropriate faculty review processes set forth in the Articles of Academic Governance.

IV. Speakers

Speakers invited or sponsored by ICSW shall be permitted free expression of their opinions and viewpoints fully consistent with the Limitations set forth in Section II above. ICSW also deeply values and models respectful and collegial treatment of such presenters, even those who take positions that may be controversial or challenging to the ICSW community. The ability of presenters to speak, and of audiences to hear a presenter speak free from undue disruption and interference, shall therefore be protected.

ICSW reserves the right to determine who will be invited to speak on campus and must approve all invitations to speak at faculty, staff, or student events that occur on campus or under the auspices of ICSW. ICSW also reserves the right to revoke prior invitations, cancel speaking events, remove presenters, or terminate presentations where ICSW has a reasonable concern that the Limitations set forth above will not be observed or that safety and order cannot be maintained.

V. Gatherings, Protests, and Demonstrations

To facilitate robust debate and the free exchange of ideas, ICSW recognizes that peaceful gatherings, protests and demonstrations are legitimate means of expression and are permitted subject to the following limitations. Specifically, no such gathering, protest, or demonstration:

- 1) May take place in indoor rooms/areas where quiet or reflection may be expected by those using these rooms/areas;
- 2) Will be permitted if it is violent or if it threatens to turn violent or threatening to the safety and security of ICSW or individuals, in the reasonable opinion of ICSW administrators or law enforcement;
- 3) May disrupt the function of ICSW, interfere with the rights of other members of the ICSW community, or damage ICSW or private property.
- 4) May violate campus or legal limitations regarding unlawful/unprotected speech, as set forth in Section II above;
- 5) May be undertaken without being scheduled in advance and subject to reasonable time, place, and manner restrictions, which prior scheduling is required to ensure lack of disruption of teaching, meetings, or ICSW operations; or
- 6) May be permitted if it does or may violate City ordinances or procedures for outdoor street gatherings.

VI. Posting of Signs, Notices, Posters, and Banners; Leafletting and Commercial Solicitations

Unless expressly designated for broader use, bulletin boards, easels, and computers maintained by ICSW, and all walls, doors, whiteboards, chalkboards, windows, and other areas within classrooms, are reserved exclusively for official ICSW communications and are not available for posting of general information or speech. Likewise, the ICSW website is reserved for official ICSW communications; except in designated portions of the website or electronic communications that invite comments or interaction, ICSW's website may not be used to post information or engage in speech that does not represent official communications of ICSW. Messages or slogans of any kind shall not be painted, hung, distributed, or otherwise written on buildings, windows, sidewalks, walls, or other structures or surfaces, or on the personal property of others. Leaflets and commercial solicitations or appeals may only be circulated or distributed, whether in hard-copy form within the Building or through use of ICSW's email system, upon prior written approval by the Dean of Students or Academic Dean.

VII. Appeals

Any person seeking to appeal decisions made because of this policy, may do so by submitting a written appeal to ICSW within 10 business days of the adverse decision. The appeals committee will be comprised of the President of ICSW, Academic Dean, and Vice President, Finance and Operations. The written appeal must include the specific reasons for the appeal request. The decision of the Appeals Committee shall be final.

VIII. Revisions and Updates to this Policy

ICSW reserves the right to revise or update this Policy to address the changing educational, operational, or compliance needs of ICSW and its campus community. The President in consultation with the faculty will recommend to the Board of Directors changes to the Policy. Any such revisions or updates will take effect as of the date adopted by the Board of Directors, unless otherwise stated by the Board.

Continuing Education Program

The Continuing Education and Professional Development program is designed to promote a deeper understanding of the psychodynamic theories, skills, and values that form their practice. Continuing Professional Education provides social workers, professional counselors, psychologists, and other human service professionals meaningful opportunities to expand their knowledge base and practice skills to meet the needs of their clients and organizations more effectively.

Continuing Education Credits

The Institute for Clinical Social Work is licensed by the State of Illinois Department of Finance and Professional Regulation: Division of Professional Regulation to provide CEUs to licensed social workers and psychologists.

Students should consult their state board for conversion of course credit hours to continuing education units. Faculty should consult their state board for conversion of teaching hours to continuing education units.

Distance Learning Policies

Online classes are delivered using a live audio video conferencing program. We give equal weight to the student's participation online and onsite. The following guidelines should be followed:

- During online classes, all students are expected to be seated, have their cameras on, and demonstrate engagement in class discussions and presentations
- During online classes, intrusions by children, pets, and other family members are to be avoided.
- Attendance policies are guided by the instructor's syllabus; online and onsite classes are given equal weight.
- Non-attendance during onsite weekends is a serious matter: not only does the class lose out on your in-person attendance, but it also results in a missed class. Instructors may, but are not expected to, record or broadcast the class. Non-attendance of onsite classes is a serious progression issue. Students missing any onsite classes without the approval of the Academic Dean are subject to a progression hearing.
- If an instructor needs to cancel a class session, the instructor should immediately inform the Registrar & Director of Academic Services and the Associate Director of Academic Affairs, and should make every attempt to contact the students in the class right away. The class session should be re-scheduled within the same semester as soon as possible in conjunction with the students, and the instructor should inform both the Registrar and the Associate Director of Academic Affairs of the re-scheduled class session.
- There is one onsite weekend per semester for the PhD distance program. In the case of weather grossly interfering with air travel, ICSW will notify students via email and an online alert of alternate plans. Students are expected to watch their email for updates. During weather emergencies, students are to log on the entire weekends of classes.

Return of Title IV (R2T4) Policy

Federal Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which assistance is awarded. Students receiving financial aid who withdraw or stop attending may be required to return a portion of financial aid received. Once notified of a total withdrawal, the institution is required to apply a federally mandated formula to determine how much of the federal funding was "earned" by the student up to the time of withdrawal. This review and recalculation is called a "Return of Title IV Aid Calculation."

Drops/Withdrawal Policy

Students may **Drop** one or more classes through the second full week of the semester. The specific drop deadline per term is specified on the Academic Calendar. When a class is dropped, the class is not reflected on a student's transcript and 100% of tuition is refunded.

Students may **Withdraw** from one or more classes through the fourth full week of the semester. Withdrawals will show on a student's transcript with a grade of "W" (Withdrawn), and their GPA will not be impacted.

It is ICSW policy that attendance will be monitored in all classes. However, non-attendance of a course does not constitute an official drop or withdraw from a course or courses.

Students who withdraw before the end of the third week in the semester will receive a 50% tuition refund (specific deadline per term is specified on the Academic Calendar).

Week of Drop/Withdrawal Refund Percentage

First Two Weeks	100%
Third Week	50%
After Third Week	0%

According to federal regulations, if a student who receives federal financial aid leaves the Institute during a semester, those federal Title IV financial aid funds may have to be adjusted and, in some instances, repaid to federal sources. This may result in students having a balance due to ICSW.

Students with extenuating circumstances can submit an appeal to request an exception to ICSW's drop, withdrawal, and refund policies. Exceptions will only be granted if the student can demonstrate extenuating circumstances and at the discretion of the administration. Students must submit a written appeal to the Registrar and Director of Academic Services for consideration by the end of the semester in question. This appeal may or may not supersede the federal regulations around Title IV funding.

Calculation of Title IV Returns

The calculation for what amount of Title IV funds that may need to be returned are calculated based on the number of days the student attended school during the semester. Factors that affect this calculation include the start of the term date, the date of withdrawal, any breaks that fall within the term and the final day of the term. The calculation is the percentage of days attended divided by the number of days in the term. That is the percentage that is utilized when calculating the amount of title IV funds that may need to be returned.

Order of Title IV Program Fund Returns

- Unsubsidized Direct Loans
- Direct PLUS Loans

Time Frame of Title IV Program Fund Returns

The time frame for return of funds will be as soon as administratively possible but no later than **45 days** after determining a student has withdrawn.

Post-Withdrawal Disbursement

If you did not receive all of the funds that you earned, you may be due a post-withdrawal disbursement.

- Grant funds must be disbursed within **45 days**.
- If your post-withdrawal disbursement includes loan funds, they will be offered to you within **30 days**. ICSW must obtain your permission within 14 days to disburse the loan funds to you. You may choose to decline some or all of the loan funds so that you do not incur additional debt.

All post-withdrawal disbursements are applied to a student's account first towards outstanding tuition.

If you receive (or ICSW or parent receive on your behalf) excess Title IV program funds that must be returned, ICSW must return a portion of the excess equal to the lesser of:

1. your institutional charges multiplied by the unearned percentage of your funds, or

2. the entire amount of excess funds.

The school must return this amount even if it did not keep this amount of your Title IV program funds.

Financial Impacts of Title IV Program Fund Returns

Depending upon the Title IV calculation, the following will occur:

- If the R2T4 calculation results in a credit balance on the student's account, the credit balance will be disbursed as soon as possible but no later than **14 days** after the calculation of R2T4.
- If the R2T4 calculation results in an amount to be returned that exceeds the school's portion, ICSW will return the amount to the federal programs on behalf of the student and the student must repay the funds to ICSW.

Financial Holds / Administrative Leave of Absence Policy

Students who are not in good financial standing with ICSW may have a financial hold placed on their student account. Good financial standing with the institution indicates either that the student has paid their tuition bill on time, in full, or that they have worked with the Vice President, Finance and Operations, on an agreed upon payment plan. Students who have an outstanding tuition balance and no payment plan in place by June 30 will have a financial hold placed on their account and they will be unable to register for classes or work on their dissertation for the upcoming fall semester and until they have addressed their account and have returned to good financial standing.

Students placed on a financial hold will have one semester to bring their account into good financial standing while maintaining their student status. At the end of this semester, students who have not returned to good financial standing will be placed on an Administrative Leave of Absence with the school. Please note that students on Administrative Leave of Absence may trigger repayment of federal student loans while away from their studies. Students on Administrative Leave of Absence will have six months to bring their financial account into good standing, or they will be withdrawn as students from ICSW at that time. Students who bring their account into good financial standing will have their administrative leave of absence and financial hold lifted and may return to their school work.

Leave of Absence Policy

A student may request a leave of absence from the program when circumstances prohibit continued enrollment. In order to request a Leave of Absence, the student must submit the Leave of Absence (LOA) form and submit it to the Registrar & Director of Academic Services. LOA requests may be submitted at any time within the academic year, but the student will be responsible for tuition expenses incurred in accordance with the academic calendar if the request is submitted during an academic term of enrollment. The requested LOA is not approved until signed by both the Academic Dean and the VP, Finance and Operations.

Students who owe a tuition balance to ICSW may not be approved for LOA/RLOA until the balance is paid or they enter into a payment plan. Tuition paid prior to an approved leave of absence, and not yet utilized, will be held and credited to the student's tuition when they return to the program. During a leave of absence, the student may not continue to receive clinical or dissertation consultation begun and paid for prior to the beginning of the leave. The student may not initiate any new consultations.

Students considering asking for a Leave of Absence should know, if they are receiving Federal financial

aid, that Federal guidelines may require the beginning of repaying outstanding loans during the Leave.

The maximum time for approved leave status is one year at a time. If the student requires a longer leave of absence, then they must submit a request for extension of the leave for up to an additional year. If a student on leave does not return after their leave is over or does not apply and receive permission for an extension, then they will be “withdrawn” from their program and as an ICSW student.

Registration Policies and Procedures

Registration dates for each term are identified on the Academic Calendar on ICSW’s website. The Registrar & Director of Academic Services will send correspondence to all enrolled students prior to the registration date to confirm the registration procedures. Full-time students will be registered by the Registrar & Director of Academic Services unless students opt-out, and unique and part-time students should be in touch with the Registrar & Director of Academic Services to confirm a registration plan. Once registered, it is the student’s responsibility to confirm their schedule is correct. All corrections and concerns should be directed to the Registrar & Director of Academic Services.

Full time students must follow the full-time curriculum plan for their cohort, and part-time students must follow the part-time curriculum plan. Unique students must follow their plan as approved by the Academic Dean. All students are responsible for up-to-date tracking of their clinical consultation meetings.

Students with financial holds on their accounts may not be registered until their financial account is addressed.

Satisfactory Academic Progress (SAP)

To remain eligible for federal financial aid, you must make satisfactory academic progress (SAP) as a student, which means demonstrating that you are successfully working toward your degree. All students, whether receiving financial aid or not, are required to meet SAP standards.

SAP is evaluated at the end of each term for all students who are in a financial aid eligible degree program, including both full-time and part-time enrollment. This applies to all periods of the student’s enrollment, and the standards are the same for students who are and are not receiving Title IV aid. Summer term is included for PhD students.

The Institute for Clinical Social Work measures Satisfactory Academic Progress after each semester (Fall, Spring, Summer) using the following guidelines:

- A minimum Grade Point Average (GPA) of 3.0. See “Grading Standards” for how grades are assigned.
- All courses eligible for financial aid must count toward your degree program. You are eligible to receive financial aid for 100% of the published degree credits required to complete your program.
- Credit hours that are accepted from another institution toward your educational program will be counted as both attempted and completed hours.
- Students must meet the following pace-toward degree completion standards to meet SAP for financial aid: 67% of the credits you attempt for all time periods. Courses with grades of W, IP, or I do not count as credits earned. A passed course, if retaken, will be considered passed only once, yet attempted twice. Audited courses do not count toward SAP. Withdrawn courses count toward the maximum time frame but are not calculated as part of the GPA.

- **Maximum Time Frame:** Students must complete their programs of study within 150% of the total credit hours required for the completion of their degree program at ICSW. For MA students, 150% is 90 maximum hours. For PhD students, 150% is 114 maximum hours.

The cumulative SAP calculation includes letter grades, withdrawn courses, repeated courses, incomplete grades, and hours transferred in from other schools as determined by the Registrar's Office.

SAP Warning

If you are not meeting SAP standards, prior to the next term, you will receive an email notice that you have been placed on Warning. This Warning will be in effect for the next term of enrollment. During this time, you will be eligible to receive financial aid. If you are unable to meet the criteria after the semester on Warning, you will be placed on Financial Aid Suspension.

SAP Suspension and Appeals

If you have been placed on financial aid suspension due to failure to maintain SAP after a Warning semester, your financial aid awards will be canceled for the term in question. Students can submit a written appeal to the SAP Appeals Review Committee, which consists of representatives from Financial Aid and Academic Affairs. Appeals must be submitted within 14 days after the date of the Financial Aid Suspension notice. Appeals should describe any extenuating circumstances that may have affected a student's ability to maintain satisfactory academic progress. Extenuating circumstances that will be considered for an appeal include the following items:

- Death of a relative of the student;
- An injury or serious illness of the student (medical documentation required);
- Other extraordinary circumstances may be considered on a case-by-case basis (documentation required)

Circumstances related to the typical adjustment to college life are not considered for appealing a suspension. Only up to two extenuating circumstances SAP appeals are allowable during a student's time at ICSW.

In addition, the appeal should describe the actions the student plans to take to re-establish satisfactory academic progress. Relevant documentation is required. Students will be notified via email if their appeal has been approved within 10 business days of the receipt of their appeal.

If the appeal is successful, the student will be placed on Financial Aid Probation for one semester with an academic plan which will be established by the committee and the student, and with input from the student's academic advisor when appropriate. The individual academic plan will establish the criteria for continued financial aid for future semesters and will be reevaluated each semester. If the student does not meet the conditions outlined in their academic plan, they will lose their aid eligibility.

Status Change Policies and Procedures

Change to/from Distance/Onsite or Full-Time/Part-Time Status

Students wishing to change the modality or status of their program must obtain the written permission of the Academic Dean, plus complete a "Change of Status" form and submit it to the Registrar & Director of Academic Services prior to the beginning of the semester for which the change is requested. Written support may be requested from the student's advisor, instructors or clinical consultants.

Returning Students

Students who have taken an approved Leave of Absence and who wish to return to their studies may

request a Return from Leave of Absence (RLOA):

- The student completes a Return from Leave of Absence (RLOA) form and submits it to the Registrar and Director of Academic Services. The request is reviewed by the Academic Dean and the VP, Finance and Operations to ensure that the student is in good financial and academic standing to return to their studies.
- A student will not be approved to return from LOA if they are not in good financial standing.
- A student will not be approved to return from LOA if they are not in good academic standing, without an approved remediation plan in place.
- The Registrar and Director of Academic Services will inform the student of their approved RLOA and will work with the student to re-enroll in classes.

If a prior student wishes to return to ICSW but their status is withdrawn rather than on an approved Leave of Absence, that individual must reapply for admission to ICSW and be offered admission in order to return. Upon readmission:

- A file review will be conducted with the student to determine outstanding course or Practicum work. Credit will be given for the completion of prior coursework at ICSW where possible. All plans for degree completion must be approved by the Academic Dean.
- A progression committee meeting may be scheduled to discuss the student's request, if necessary.
- The student may be required take additional courses or retake key courses depending on the amount of time lapsed and evidence of capacity as reflected in prior and recent work. This includes clinical and research practica.
- The student may be readmitted under a Probationary Status and/or be given timelines for task completion
- All financial obligations to ICSW must be paid in full prior to reactivation of student status.
- The Admissions Committee must approve the readmission.

Student at Large Program

ICSW's Student-at-Large program is designed for professionals or clinicians who are interested in learning about psychodynamic theories. Our courses are taught by our faculty who are experts in the field of mental health. Students may enroll in any course except for Case Conference courses subject to instructor approval. Students can receive a certificate of completion or CEU credits. No more than four courses may be transferred for credit to our Master's or PhD program. Transfer students will also be expected to fulfill all class requirements to receive full credit and complete the application process for our PhD or Master's programs.

Admissions: Application and Interview with the Academic Dean.

Student Evaluation and Grades

Classroom instructors grade students on their course work and submit evaluations on the caliber of each student's work. The purpose of grading is evaluative, as well as to provide a learning tool for students, i.e., to provide feedback on progress, strengths and weaknesses, and issues that need to be addressed. Cumulative grade point average is based on full letter grades, not plus or minus grades. Only letter grades are recorded in the students' transcript. Instructors are required to submit full letter grades (not pluses or minuses) within two weeks after classes end.

Grading Standards

Grades are assigned according to the following standard:

A	Superior work	4.0 value
B	Satisfactory work	3.0 value
C	Marginal work	2.0 value
F	Failure	0.0 value
P	Pass	0.0 value, only to be assigned in Case Conference, Clinical and Research Practicum and Transfer Credits
IP	In Progress	Credit Deferred, Clinical and Research Practicum Only
AU	Audit*	0.0 value
I	Incomplete	0.0 value, awaiting grade

Incompletes: An incomplete can be granted only in cases of significant personal emergency and when the student has been in touch with the instructor in advance of the due date for the required work. Any incompletes must be resolved by the last day of the following semester (fall, spring, summer). If the work has not been completed by this date, the incomplete grade will convert to a failing grade. It is always the student's responsibility to initiate the process for an incomplete. It is also the responsibility of the student to turn in the completed work by the following semester's end.

Late Assignments: A late assignment is one that is submitted after the deadline but before grades are submitted. Approval for turning assignments in late is determined by individual instructors.

Assignment of Credit Policy

In the Master's Program, the standard course extends over a fifteen-week period including final examinations week. Master's courses carry one credit for every fifteen class hours (encompassing both synchronous and asynchronous class time.) For every one-hour of class students are expected to do a minimum of two hours of work outside instructional time for each credit hour awarded. Courses in the PhD Program (onsite and distance) carry one credit for every eight class hours. One credit hour is equivalent to eight hours spent in class and a minimum of two hours work outside instructional for each credit hour awarded. Credit is earned if a student receives an A through C, or P grade.

Please note that a grade of F, I, IP, or Audit does not earn credit.

Transfer Credit Policy

ICSW accepts, on an individual basis, transfer of credits from other accredited Master's or Doctoral Programs for courses which are equivalent to courses in the curriculum of ICSW's Master's or Doctoral Program pending evaluation of, and approval by, the Academic Dean. Courses from non-accredited programs, including analytic institutes, may be considered for transfer credit with approval of the Academic Dean, provided that the proposed course(s) to transfer meet all other criteria outlined in this policy.

Criteria for Evaluation of Transfer Credit:

- The evaluation will include a judgment of the general similarity in content and clock hours. Transcripts and syllabi must be provided by the student for review prior to granting transfer credit approval.
- ICSW will accept credits totaling no more than twenty percent of the required coursework in any ICSW degree program.
- Courses may be no more than 5 years old to be considered for transfer credit.

If all the above criteria are met, the student must successfully complete an evaluation of student learning to demonstrate knowledge of course content as determined by an appropriate ICSW faculty member selected by the Academic Dean. If the faculty member determines competency of the course content, the student will be provided transfer credit (Grade of "TR") as a substitution for taking the class and will not need to take it to complete their degree at ICSW.

Any articulation agreements regarding transfer arrangements between ICSW and other institutions will be listed within this policy.

NOTE REGARDING LICENSING REQUIREMENTS: It is the responsibility of the student/licensing applicant to ensure that coursework from institutions outside of ICSW submitted to the licensing board for license applications meet state requirements. Acceptance by ICSW of transfer coursework to be applied toward one's degree at ICSW does not guarantee the acceptance of other institutions' classes by the state for licensure.

Section 2: General Policies and Procedures

Active Duty and Public Health Service Students

Students are expected to inform their command of their participation in the ICSW program and to discuss the need for periodic leaves to attend classes.

- In cases where leave is denied, the student is to provide the paperwork documenting the request for and denial of leave.
- In cases where training interferes with onsite or online classes, students are responsible for contacting instructors and for making up missed work. Evidence of the required training must be submitted to the Dean.
- In the case of deployment and pre-deployment training, the student is to inform the Dean and an accommodation will be devised.

Students who are deployed may take a leave of absence or continue with clinical consultation and/or courses if means of communication exists.

Collection Policy

Balances on student accounts must be paid in full, have financial aid funds applied, or be in a payment plan within 4 weeks from the start of the semester. The below highlights ICSW's escalation processes for obtaining funds due on accounts that have not met institutional policies:

- 1) Account must be paid off before graduation. This includes the graduation fee or \$350 for PhD graduates and \$300 for MA graduates (see Fee Schedule).
- 2) Payment plans are 10-months, from September to June each year, and must be paid in full by June 30 of the given academic year

Any student that has an outstanding balance with ICSW, or is delinquent in making payments per a previously agreed upon payment plan, cannot do any of the following:

- Register for classes including the Clinical Practicum
- Schedule or hold a Case Presentation
- Schedule or hold a dissertation proposal or defense
- Receive copies of transcripts
- Receive an approved Leave of Absence
- Graduate

ICSW will not impose any penalty on Chapter 31, 33, and 35 beneficiaries, including the assessment of late fees, nor will it deny access to classes, libraries, or other educational institutions, or require these individuals to borrow additional funds, because of the individual's inability to meet his or her financial obligations to the educational institution due to delayed disbursement of payment by the United States Department of Veterans Affairs.

Email Use Policy

Email services are intended to allow all ICSW students, faculty and staff to conduct institutional business. ICSW will provide all students upon matriculation and all faculty/staff upon employment with

their official ICSW email address. The official email address is to be used for all school email correspondence. Communications from administration will be directed to the official email address on file and community members are responsible for checking this email inbox regularly. Use of personal email addresses for institutional business is prohibited. ICSW email addresses will remain active for graduating students until six months post-graduation. Students who withdraw from the institution and staff/faculty no longer employed by ICSW may lose access to their email address immediately.

Fee Schedule

Graduation Fee MA Students:	\$300
Graduation Fee PhD Students:	\$350
Fee for Graduates not attending ceremony:	\$150

Financial Aid Timeline

October -May

Search and apply for Scholarships

- ICSW offers primarily Stafford Loans provided through the FFEL program. Getting your Ph.D. or Master's is a significant financial commitment and ICSW strongly suggests offsetting this financial burden by using private scholarships. You can find a list of internal scholarships on the ICSW website.

January 1

The FAFSA becomes available online at <https://studentaid.gov/h/apply-for-aid/fafsa>

June 15

ICSW FAFSA Completion Deadline

July 31

ICSW Financial Aid Forms Due

August 15

Signed Award Letter Due

- After receiving your financial information from the FAFSA and your other financial aid materials, ICSW will package an award for you and send you a detailed Award Letter regarding the aid you will receive. If you accept this award, you must login to the financial aid portal to sign the award letter.

Signed Master Promissory Note and Entrance Counseling Due

- If you are a first-time borrower at ICSW and receiving a Stafford or Grad PLUS loans, the lender will require that you sign a Master Promissory Note (MPN), which is a contract between borrower and lender wherein you as the borrower agree to repay your loans in full after you graduate, withdraw or drop below half-time status. Concurrently, entrance counseling, which gives you all the information you need to know about your loans, is the final step required before your loan can be disbursed.

May 15

Exit Counseling

- Once a student is scheduled to graduate, withdraws or drops below half-time status, exit counseling is required. Exit counseling gives you all the information you need to know about repayment options and interest rates on your loans. Failure to complete exit counseling results in ICSW withholding the student's degree, certificate, transcripts and other documents.

Fraud Prevention and Detection Program

ICSW's fraud prevention and detection program was implemented in order to minimize potential risks associated with fraud at ICSW. We want to encourage any community member to inform us about any possible or suspected fraud. You can call or email the Vice President of Finance and Operations directly with any instances you may have witnessed or are unsure about. There is also an anonymous reporting mechanism to encourage reporting. Please send a detailed email message about any instances of possible or suspected fraud to: fraud@icsw.edu

Grievance Policy

The purpose of this policy is to ensure that students have a means and opportunity for fair resolution of disputes involving individual student complaints regarding course grades and other decisions involving a student's matriculation at ICSW.

ICSW also sets forth specific appeal processes for

- 1) decisions involving requests for education records under the Family Education Records and Privacy Act (FERPA), and
- 2) decisions regarding requests by students for accommodations, modifications, or auxiliary aids under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.

This Policy does not address other compliance-related grievances, such as those raised under the *Non-Discrimination Policy* and related Title IX Policy, including allegations of discrimination, harassment, or retaliation (except in the context of ADA accommodations), which are separately addressed in other ICSW policies and posted on ICSW's website. Other allegations of failure to comply with federal, state, or local law governing higher education may be addressed using other institutional policies or procedures, or as directed by ICSW.

Grievances may only be filed by the person who is themselves the aggrieved individual. Copies of all materials filed or generated about a grade grievance, including any resolution, will be placed in a student's file.

GRIEVANCES UNDER THIS POLICY MAY BE BROUGHT BY:

- 1) Any student who is currently registered at ICSW
- 2) Any student who was enrolled in the immediately preceding term at ICSW
- 3) Any student on approved leave of absence from ICSW

APPLICATION OF POLICIES

Where a complaint or concern is subject to more than one grievance or appeal procedure – or where

questions or ambiguities arise about the procedures – ICSW’s Academic Dean or designate will resolve the ambiguity or address the questions and advise the parties at issue about the appropriate procedure to be used to air a grievance or concern.

TIME LIMIT FOR FILING GRIEVANCES

Except in extraordinary circumstances and for good cause shown, all grievances must be filed within 30 calendar days of the decision, action, or events giving rise to the grievance.

Students may petition the Academic Dean to pursue a grievance that do not meet the time limit set forth in this Section. Any such petition should address why the student believes the situation constitutes an extraordinary circumstance and why there is good cause for ICSW’s consideration of the grievance. ICSW reserves the right to decline consideration of any grievances that do not in the view of ICSW satisfy the exception set forth in this Section.

SPECIFIC STUDENT GRIEVANCE PROCEDURES

A. GRADE GRIEVANCE

A student may appeal a final course or practicum grade if the student contends that they should receive a different final grade than their faculty member’s evaluation of their performance using the documented course guidelines (e.g., syllabus). Grounds for a grade grievance may include one or more of the following:

- 1) The final grade violated the faculty member’s or the Institute’s written policies
- 2) There was a miscalculation of the final grade or miscalculation of the grade(s) for course components
- 3) The final grade was assigned on a basis that is arbitrary, capricious, or demonstrably inappropriate considering the student’s performance

Steps to pursue a grade grievance

- 1) The student should discuss their concerns directly with the faculty member or consultant of the course within 30 calendar days of receiving the final grade. If the issue is resolved, the grievance process will conclude, and the resolution will be documented and submitted to the Academic Dean by the faculty member or consultant for the student’s file.
- 2) If the student is not satisfied, within 60 calendar days of receiving the grade in question, they must file a written grade grievance via email. The faculty member cited in the grievance will be copied in this complaint, as well as the academic advisor and Academic Dean. In this written communication, the student should explain their concerns about the final grade, present reasons for contending that the final grade is not correct, confirm they attempted to resolve the issue with the faculty member directly (Step 1), and asked- the faculty member or consultant to explain, in writing, their reasons for the final grade.
 - a. The faculty member or consultant of the course should reply within 10 business days to the student’s concerns, in full and in writing, copying both the student’s academic advisor and the Academic Dean.
 - b. If the student is not satisfied with the faculty member’s written explanation, the student may request a meeting with the faculty member and the Academic Dean. The meeting with the Academic Dean should include the student, the faculty member or consultant, and the student’s academic advisor. Within five business days of the meeting, the student should

prepare and give copies to their faculty member, academic advisor, and the Academic Dean of the following:

- i. A copy of syllabus from the course in question, from the term in question
 - ii. Copies of submitted assignments, including grades received
 - iii. Copies of written communications with the faculty member during the entire grievance process in question. If the student does not have or cannot locate copies of any or all of the above-referenced documentation, the student should request by email (with copies to the Academic Dean and advisor) that the faculty member circulate copies of any such documentation or communication in the possession of the faculty member.
- 3) The Academic Dean shall review the student's materials, and then meet with the faculty member or consultant, the student, and the student's advisor. At that time, the student will have an opportunity to present their arguments in favor of the grade grievance. Following this meeting, the Academic Dean will notify the student, academic advisor, and faculty member of their decision in writing, which will be considered final and not subject to further grievance.

B. FAMILY EDUCATION RIGHTS AND PRIVACY ACT [FERPA] APPEAL

ICSW maintains records for all its students and former students and complies with the Family Education Rights and Privacy Act of 1974, 20 U.S.C. §1232g (FERPA), regarding the release of personally identifiable information concerning individual students. Academic transcripts and other information are sent to other institutions only upon the signed request of the student. Student records are available to the student on request for reviewing at ICSW. No materials may be added to, or deleted from, the student records except by the Registrar & Director of Academic Services and consistent with applicable law. Written grievances regarding ICSW's production and handling of education records may be filed with the Registrar & Director of Academic Services within 14 business days after the decision or incident in question and will be resolved in writing by the Registrar & Director of Academic Services or designee. A copy of the Registrar & Director of Academic Services' decision will be placed in the student's file.

C. GRIEVANCE -- DENIAL OF REASONABLE ACCOMMODATION UNDER THE ADA AND SECTION 504 OF THE REHABILITATION ACT

As stated in the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101 *et seq.*, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 701, qualified students with disabilities are protected against discrimination and have the right to reasonable accommodations, modifications, and auxiliary aids that will allow them equal access to programs and services offered by ICSW. The Institute for Clinical Social Work is dedicated to supporting individuals with disabilities and has adopted the following accommodation and grievance process to facilitate provision of reasonable accommodations, modifications, and auxiliary aids, as well as resolution of any disputes relating to such requests. The Dean of Students is ICSW's Section 504 Coordinator.

Students with disabilities may request accommodations (including modifications and auxiliary aids) by contacting the Dean of Students. Additionally, if students disclose any disabilities on their self-assessment form, their advisor will make a referral to the Dean of Students to explore any potential accommodations. Documentation will be required to evaluate requests for reasonable accommodation, and ICSW will then engage in an interactive process with the student to determine what, if any, reasonable accommodations are available to assist the student in accessing programs and services. As part of this process, ICSW may consult with the student's licensed professional or treater.

Even if ICSW does not agree that a particular requested accommodation is reasonable or feasible to provide, consistent with ICSW's resources and applicable law, ICSW will interact and work with the student to select and provide a reasonable accommodation that will be acceptable and helpful to the student. If a student believes they have been subjected to discrimination because of a disability or has been denied reasonable accommodations, the process and timeline for filing a grievance is as follows:

- 1) The student grievant is encouraged to express their concerns directly to the appropriate faculty/staff member involved in the conflict in an informal manner. The Dean of Students may also be contacted in writing at the same time to clarify rights and procedures for both parties. The Dean of Students will keep a written record of interactions and completion of each step of the grievance process to ensure that the student's request has been fairly addressed. The accommodations process will be fully documented, including notes recorded of pertinent discussions. The Dean of Students will be involved in such interactive discussions as appropriate and with the goal of identifying a reasonable accommodation or resolution of grievances informally without the need for the student to initiate a formal written grievance (as set forth in Section III-D-2 below).

The Dean of Students will retain all requests for accommodation, supporting documentation, including the date(s) of the request(s) for academic adjustments or services, the nature of each request, the final determinations and the reason(s) for any denials in the student's file. These records will be maintained in a file separate from student education records as required by applicable law.

- 2) If the complaint is unresolved after the informal discussion, the student should file a formal, written complaint with the Academic Dean. The written complaint should state the basis for the complaint, relevant details, and a proposed resolution to the dispute. ICSW may request additional documentation or an opportunity to speak with the professional who has provided the documentation supporting a request for accommodating dation. The Academic Dean may exercise discretion in handling the grievance and may request that the student and/or other witnesses meet with the Academic Dean to further discuss the grievance. The student also has the right to meet with the Academic Dean. If a student meets with the Academic Dean, the student can select a support person for assistance. If the student decides to have a support present, the student must notify the Academic Dean of their presence and relationship to the student at least one full business day in advance of the student's meeting with the Academic Dean. Support people are nonparticipating members at the meeting. They can advise the student privately, but cannot present information or make statements during the meeting.

The Academic Dean shall consider all pertinent materials and determine the disposition of the grievance, which may include dismissal of the grievance, granting the relief requested by the student, or the creation of another disposition.

Where a student believes that a course or practicum grade reflects discrimination, harassment, or retaliation based on a protected characteristic, such complaints should be separately filed with the Dean of Students and will be investigated and resolved using ICSW's *Non-Discrimination Policy* and any other applicable ICSW Policy. Where a grade appeal is lodged on more than one basis, including based on discrimination harassment or retaliation, ICSW reserves the right to identify an applicable procedure and sequence that will be used to promptly and thoroughly resolve the student's allegations.

D. COMPLAINTS OR CONCERNS INVOLVING DISCRIMINATION, HARASSMENT, OR RETALIATION OR

TITLE IX COMPLIANCE:

Complaints or concerns about discrimination, harassment, or retaliation, other than requests for accommodation, are beyond the scope of this Grievance Policy. Title IX concerns or complaints are also beyond the scope of this Policy. Any such complaints or concerns should be brought to the attention of the Dean of Students or any individual in a leadership role at ICSW. Grievances originally filed under this Policy may ultimately be investigated and resolved using the ICSW's *Sexual Misconduct Policy*, *Anti-Discrimination Policy*, or other compliance policies, if the grievance appears to raise issues properly addressed under those Policies in lieu of, or in addition to, issues covered by Sections III A through D of this Policy. In the case of an ambiguity, or where a grievance appears to raise issues implicated by the above grievance policy as well as other ICSW policies, the Academic Dean has the discretion to determine which policy shall be used to resolve the concern or grievance and will notify the grievant and other involved parties in writing of the applicable procedure.

Non-discrimination Policy

The commitment of the Institute for Clinical Social Work to the most fundamental principles of academic freedom, equality of opportunity, and human dignity requires that decisions involving students be based on individual merit and be free from invidious discrimination in all its forms.

It is the policy of the Institute for Clinical Social Work not to engage in discrimination or harassment against any person because of race, color, religion, sex, gender identity, national origin, ancestry, age, marital status, disability, sexual orientation, unfavorable discharge from the military, or status as a veteran or disabled veteran, and to comply with all federal and state nondiscrimination, equal opportunity, and affirmative action laws, orders, and regulations. The Institute's nondiscrimination policy applies to admission, employment, and access to and treatment in the Institute's programs and activities. Complaints of invidious discrimination prohibited by the Institute's policy are to be resolved within existing Institute procedures.

In accordance with the Rehabilitation Act of 1973, Section 504, and the Americans with Disabilities Act of 1990 (amended in 2009), the Institute for Clinical Social Work maintains the following policy statement: "No person shall, on the basis of handicap, be excluded from participation, in be denied the benefits of, or be subjected to discrimination under any education program or activity conducted by the Institute for Clinical Social Work."

For information about grievance procedures related to this statement, please refer to "ADA and Section 504 of the Rehabilitation Act Grievance Procedures".

Respect for Diversity and Inclusion

Guided by the NASW and ACA Codes of Ethics and the mission of ICSW, students and faculty have a shared for championing social and economic justice for all members of society. This includes a commitment to eliminate personal and institutional discrimination, ensure access to needed resources and opportunities for all persons, especially those who are disadvantaged or disenfranchised. Prejudicial

attitudes and discriminatory practices are examined. Students are expected to be respectful of the opinions of others while at the same time striving to attain the ideals of social justice.

Retention of Data Policy

Data should be maintained in a secure location, i.e. locked file cabinet and/or secure online system for five years after graduation or withdrawal. The statistical data and IRB approval forms should be maintained indefinitely. Five years after graduation, raw data i.e. tapes, questionnaires may be destroyed. Once raw data are entered into a data management system and well protected, the system, too, may be kept indefinitely.

Sexual Misconduct Policy and Complaint Resolution Procedures

(Revised August 2022, effective August 1, 2022)

I. Policy Statement

Sexual misconduct, including sexual discrimination, harassment, non-consensual sexual intercourse and/or contact, exploitation, and interpersonal violence such as stalking, dating violence and/or domestic violence, will not be tolerated at the Institute for Clinical Social Work (ICSW). The Institute cares deeply about the health, safety, and well-being of all members of its community and is committed to fostering a community that promotes prompt reporting of all types of sexual misconduct, the timely and equitable resolution of sexual misconduct complaints, and educational and prevention programming.

This Policy applies to all members of the ICSW community, including students, faculty, staff, administrators, board members, contractors, vendors, and visitors. The Policy applies to on-campus and off campus conduct, including online or electronic conduct, when the off-campus conduct: (i) occurs during an ICSW-sponsored employment or educational activity or program; (ii) adversely impacts the education or employment of a member of the ICSW community; or (iii) otherwise threatens the health and/or safety of a member of the ICSW community.

Students and employees continue to be subject to city, state, and federal laws while at ICSW, and violations of those laws may also constitute violations of this Policy. In such instances, ICSW may proceed with an investigation under this Policy independently of any criminal proceeding involving the same conduct and may impose sanctions for violation of this Policy even if such criminal proceeding is not yet resolved.

For students and ICSW employees, this Policy applies to conduct that takes place from the time a person applies for enrollment as a student or applies for employment and continues until the student graduates or otherwise separates from ICSW or the employee ceases employment.

This policy was reviewed and amended based upon the new regulations issued by the Department of Education on May 6, 2020 with an effective date of August 14, 2020. An overview of these changes include:

Key procedure requirements mandated by the revised Title IX Regulations include: _

- Prescribed definitions of sexual harassment, sexual assault, domestic and dating violence, and stalking that are prohibited under Title IX
- The sexual harassment definition is narrower than previous definitions of sexual harassment
- Applies to all complaints of Title IX prohibited conduct for all faculty, staff, and students
- Supportive measures available to complainants regardless of whether a matter is investigated
- A signed complaint from the complainant (the person who is reported to have experienced harm) or the Title IX Coordinator as a predicate to an investigation
- A dismissal of a matter if the reported conduct falls outside of Title IX's jurisdiction
 - Because the reported conduct does not fall within the defined conduct covered by Title IX;
 - Because the reported conduct happened outside of the United States;
 - Because the reported conduct did not occur within a ICSW program or activity; or
 - Because the complainant is not participating or seeking to participate in a ICSW program or activity at the time of the filing of the complaint

- A preponderance of the evidence standard. Preponderance of the evidence means that the alleged conduct more likely than not occurred
- A presumption of innocence for the respondent (the accused)
- An investigation with the opportunity for parties (the complainant and respondent) to make a statement, provide witnesses, and present evidence
- Parties may be accompanied by an advisor of their choice to any meeting or proceeding
- In a matter involving a student bringing a complaint against a faculty or employee, ICSW may not resolve the matter by agreement
- A hearing by an adjudicator
- At a hearing the parties have the following rights:
 - to be provided an advisor
 - to object to evidence at the hearing
 - to have their advisor cross-examine the other party and witnesses
- Following a hearing, the parties have the following rights:
 - to receive a written outcome including the basis for the decision
 - if there is a finding of responsibility, to receive written sanctions and remedies
 - to appeal the decision of the adjudicator
- Designated time frames for certain aspects of the procedure, including
 - 10 days for parties to comment on evidence
 - 10 days for parties to review the investigation report
- ICSW can neither compel a party to participate in the Title IX Procedure nor retaliate against a party for not participating.
- ICSW cannot violate a party's first amendment rights

Additional Aspects of the revised Title IX Procedure include:

To best effectuate the regulations and to ensure a fair process for ICSW parties, ICSW has crafted a Title IX Procedure with the following elements:

- Parties are provided these options:
 - To be advised by the Title IX coordinator on all aspects of the procedure
 - At the hearing stage, at ICSW's expense, to select an advisor trained in ICSW's procedure, to assist preparing for and during a hearing, and to conduct cross-examination
 - For student parties, at ICSW's expense, two hours of consultation with an advisor? from the panel; the consultation is available any time after a complaint has been filed
 - At any stage of the procedure, to work with an advisor, who can be an attorney, at a party's own expense
- Except in matters in which a student is making a complaint against a faculty or staff member (see above), the matter can be resolved by agreement of the complainant, respondent, and Title IX Coordinator.
- The hearing adjudicator will be a member of ICSW's administrative staff. The adjudicator will:
 - Make evidentiary determinations
 - Make findings of responsibilities
 - Following a finding of responsibility, issue sanctions and remedies
- The decision-maker for appeal will be a high ranking member of ICSW's administrative team.
- Parties will be provided an option to waive cross-examination by their advisors and instead submit written questions to the adjudicator who will conduct the examination.

II. Notice of Non-Discrimination

ICSW does not discriminate on the basis of sex in its educational programs or services or in the context of employment or admissions. Sexual misconduct, including sexual harassment as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides that:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

This Policy prohibits sexual misconduct against all ICSW community members of any gender or sexual orientation or gender expression. This policy also prohibits harassment based on gender or sexual orientation that does not involve conduct of a sexual nature. ICSW's non-discrimination policy can be accessed at (link).

Further information about Title IX and sex discrimination in education is available from the Office for Civil Rights (U.S. Department of Education, John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor Chicago, IL 60604, 312-730-1560, OCRChicago@ed.gov, ed.gov.ocr), or ICSW's Title IX Coordinator as set forth directly below.

III. Role of Title IX Coordinator

To manage ICSW's compliance with Title IX, ICSW has a designated Title IX Coordinator, Michael Bauman (Vice President, Finance and Operations), trained in the ICSW's policies and procedures, state and federal law and other issues related to addressing sexual misconduct. Specifically, the Title IX Coordinator may do some or all of the following:

- Oversees the Title IX program at ICSW
- Advises any individual, including a claimant, a respondent, or a third party, about the courses of action available at ICSW and in the community for resolving cases of sexual misconduct;
- Conducts and/or reviews on-going climate checks, tracking, and monitoring of sexual misconduct allegations on campus;
- Oversees training, education, and prevention efforts; and
- Provides and participates in on-going training designed to assist in implementing these policies and procedures.

The Title IX Coordinator, Michael Bauman, can be reached at 1345 W Argyle Street, Chicago, IL 60640 at (773) 943-6503 or titleixcoordinator@icsw.edu

IV. Prohibited Conduct

ICSW prohibits sexual misconduct. Sexual misconduct is a broad term that, as previously indicated, encompasses sexual harassment, non-consensual sexual intercourse or contact, sexual exploitation, domestic and dating violence, and stalking.

Sexual misconduct can occur between strangers or acquaintances, including people involved in an intimate or sexual relationship. Sexual misconduct can be committed by a person of any gender identity, and can occur between people of the same or different gender identities. Sexual misconduct is a form of sex discrimination prohibited by federal and state discrimination laws. In addition, some forms of sexual misconduct violate the criminal laws of the State of Illinois. The following offenses are considered "sexual misconduct" and prohibited by ICSW.

V. Available Resources

There are various reporting options and resources available to the ICSW community. ICSW encourages those who have experienced sexual misconduct to talk to one or more of the individuals or agencies identified below.

- A. Confidential Resources:** The following resources are available to discuss incidents of sexual misconduct in confidence, and generally they only report to ICSW that an incident occurred without revealing any personally identifying information. Disclosures to these entities will not trigger an ICSW investigation into an incident. Faculty, staff and students wishing to obtain confidential assistance without making a report to ICSW may do so by speaking with one of the following confidential sources:

- **Resilience** (773-907-1062)

The following off-campus organizations also provide confidential assistance and additional resources:

- **The Chicago Rape Crisis Hotline:** 888-293-2080
- **National Sexual Assault Telephone Hotline:** 800-656-HOPE (4673)

All the above resources employ professionals specifically trained to work with individuals who report sexual misconduct and have knowledge about on-and off-campus resources, services, and options. Please note that limitations of confidentiality may exist for individuals under the age of 18.

VI. Educational Programming

ICSW is committed to offering educational programs to promote awareness of sexual, gender and sexual orientation discrimination, including sexual harassment, non-consensual sexual contact and intercourse, domestic and dating violence, sexual exploitation, stalking and retaliation. Educational programs will include an overview of ICSW's policies and procedures; relevant definitions including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty and staff; and information about risk reduction.

Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation. Returning students and employees will also have ongoing opportunities for training and education.

VII. Academic Freedom

ICSW is committed to the principles of academic freedom. Rigorous discussion and debate are fundamental to ICSW's educational mission, and this policy is not intended to determine or restrict teaching methods, course content, or the processes of intellectual inquiry and debate. The fact that speech or a particular expression is offensive is not necessarily a basis to establish a violation of this policy.

TITLE IX GREIVANCE PROCEDURE

Effective August 1, 2022.

I. Steps in the Title IX Process:

- A. Contact Title IX Coordinator to report sexual misconduct
- B. Complainant, if necessitated, will file a formal written complaint
- C. Complaint will be reviewed by Title IX Coordinator
- D. Complaint will be submitted to a Title IX Investigator
- E. Title IX Investigator will submit all information to all parties and to the adjudicator
- F. A hearing may be scheduled
- G. Adjudicator will render a decision

H. Either party can appeal the decision

*Informal resolution may be used at any time, after a formal complaint is filed

II. Introduction

ICSW is committed to fostering a campus environment that is free from unlawful discrimination on the basis of sex, including sexual harassment and sexual assault. In support of that commitment, ICSW takes steps to increase awareness of such sexual harassment and sexual assault, eliminate its occurrence on campus and in ICSW programs and activities, encourage reporting, provide support for survivors, promptly respond to all reports of sexual harassment and sexual assault, deal fairly with accused Respondents,¹ and take appropriate action against those found responsible.

This Title IX Procedure is intended to ensure a safe and non-discriminatory educational and work environment and describe the process by which ICSW meets its obligations under Title IX and its implementing regulations.

III. Scope, Applicability, and Jurisdiction

All students, faculty, staff, affiliates and others participating in ICSW programs and activities in the United States are subject to this Title IX Procedure. The Title IX regulations define “sexual harassment” to include three types of misconduct on the basis of sex which jeopardize the equal access to education that Title IX is designed to protect. These types of misconduct include: any instance of quid pro quo harassment by a ICSW employee; any conduct on the basis of sex that in the view of a reasonable person is so severe and pervasive and objectively offensive that it effectively denies a person equal access to a ICSW education program or activity; and any instance of sexual assault, dating violence, domestic violence, or stalking. An ICSW Program or Activity includes locations, events, or circumstances over which ICSW exercises substantial control over both the respondent and the context in which the Title IX Prohibited Conduct occurs, and also includes any building owned or controlled by a student organization that is officially recognized by the ICSW. Both study-abroad programs and off-campus locations that are not within an ICSW Program or Activity are not covered by the Title IX regulations.

Given the federal mandates of Title IX and its implementing regulations, the rights and obligations provided in this Title IX Procedure necessarily supersede any conflicting rights or obligations provided in the student, faculty or staff handbooks and may be addressed through other ICSW processes.

IV. Reporting Title IX Prohibited Conduct

A. What to Report

The types of sexual harassment covered by this Title IX Procedure (collectively “Title IX Prohibited Conduct”) includes conduct on the basis of sex that satisfies one or more of the prohibited items described above. Note that sexual misconduct or other discrimination on the

basis of sex that does not fall within these specific definitions may still violate ICSW's policy and should be reported to the Title IX Office.

B. Where to Report

1. Title IX Coordinator

The Title IX Coordinator is the individual designated by ICSW to coordinate its efforts to comply with Title IX responsibilities. All reports of Title IX Prohibited Sexual should be reported to the **Michael Bauman, Title IX Coordinator**, 1345 W Argyle Street, Chicago, IL 60645, (773)943-6503 or titleixcoordinator@icsw.edu

Any person may report Title IX Prohibited Conduct (whether or not the individual reporting is the person alleged to have experienced the conduct), in person, by mail, by telephone, or by email, using the contact information listed below. Such a report may be made at any time, including during non-business hours, by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

2. Other Senior ICSW Officials

Notice of allegations of Title IX Prohibited Conduct to the Title IX Coordinator or an official with authority to institute corrective measures on ICSW's behalf, triggers the ICSW's response obligations under Title IX. At ICSW, such officials include the President and Academic Dean.

3. Reports to Law Enforcement

If you are in immediate danger, or if you believe there could be an ongoing threat to you or the community, please call 911.

For conduct that could also constitute a crime under Illinois law, a Complainant is encouraged—but not required—to contact the police by dialing 911 or the local police agency in the jurisdiction in which the alleged incident occurred. Illinois law also provides that individuals who experience sexual violence are encouraged to preserve evidence and to note the identity and location of Witnesses. Contacting law enforcement to make a report allows for forensic evidence to be collected, including a SART exam if needed, which may be helpful if a decision is made to pursue criminal charges.

B. When to Report and Confidential Resources

There is no specific time frame for individuals who have experienced conduct that may constitute Title IX Prohibited Conduct to make an Initial Report pursuant to this Title IX Procedure. Individuals are, however, encouraged to make a report soon after the incident in question in order to maximize ICSW's ability to investigate and reach a finding. At any time (whether or not an individual decides to make a report of Title IX Prohibited Conduct to the

Title IX Coordinator, or other Senior ICSW Official), an individual may contact ICSW Confidential Resources that can provide emotional support and counseling.

ICSW makes available Confidential Resources for consultation regarding reports of Title IX Prohibited Conduct or other offenses, and those individuals are not required to report to or share any information with the ICSW. Consultation with Confidential Resources does not constitute notice to the ICSW. However, as described below, certain Confidential Resources may be required by law to report law to law enforcement. In addition, ICSW cannot guarantee that conversations with a Title IX Coordinator or the academic dean might not be subject to disclosure in legal proceedings or pursuant to other legal process. Communications with attorneys and medical doctors, on the other hand, may be privileged under law.

Unless the alleged victim is a minor or there is a belief that there is an imminent threat of harm to self or others, reporting Title IX Prohibited Conduct to one of these resources will not lead to an ICSW investigation or police investigation.

Except in the event the person who is the subject of the potential criminal act is a minor, the name of this individual should not be released without the individual's consent.

C. How to Report

Complainants who experience any type of sexual harassment or violence are encouraged to seek help as identified above. Any person may report Title IX Prohibited Conduct, whether or not the individual reporting is the person alleged to have experienced the conduct. To make an Initial Report of Title IX Prohibited Conduct, the Title IX Office will require disclosure of the following information, if known:

- Name of Complainant
- Complainant's role, if any, within ICSW (student, faculty, staff, alumni, other, such as vendors)
- Name of Respondent
- Respondent's role within ICSW (student, faculty, staff, alumni, other, such as vendors)
- Date of the incident
- Location of the incident (be specific: not "classroom" but "classroom 254 at St. Augustine")
- Time of the incident
- Nature of the conduct (provide specific allegations: e.g., "Complainant felt Respondent touching their genital area without permission")
- Date of previous report (if any)
- To whom any previous report was made (if any)

I. Procedure: Initial Response, Formal Complaint, Investigation, Informal Resolution, Hearing and Appeal

A. Receipt of an Initial Report of Title IX Prohibited Conduct

1. Offer of Supportive Measures

Upon receipt of notice of an Initial Report of Title IX Prohibited Conduct (which may come from any individual), the Title IX Coordinator will promptly contact the Complainant and inform the Complainant:

- of the availability of Supportive Measures, including that the Supportive Measures are available with or without filing a Formal Complaint;
- of the availability of confidential counseling resources both on and off campus;
- how to file a Formal Complaint;
- that, if the reported conduct could be a crime, the Complainant has the right but not the obligation to file a police report, and that if there is a police investigation, the Title IX Coordinator will coordinate with law enforcement; and of the importance of preserving evidence and identification and location of Witnesses.

If on the face of the Initial Report, the Title IX Coordinator determines that the conduct alleged does not fall within the scope of Title IX, the Title IX Coordinator may also inform the Complainant that the matter may be referred to another ICSW process. Even if the matter is referred, the Complainant will still receive an offer of Supportive Measures.

Supportive Measures will be different for every matter and will be based on individualized review. ICSW offers confidential counseling to community members, through the Confidential Support Team for students, and through the Faculty/Staff HELP Center for others. Other Supportive Measures may include extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the Parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. ICSW will maintain as confidential any Supportive Measures provided to the Complainant or Respondent, to the extent that maintaining such confidentiality would not impair the ability of ICSW to provide the Supportive Measures.

The Title IX Coordinator responsible for coordinating the effective implementation of Supportive Measures. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

2. Privacy And Confidentiality

Notice to the Title IX Coordinator or other Senior ICSW Official of conduct that could constitute Title IX Prohibited Conduct triggers ICSW's obligations under this Title IX Procedure. If the Title IX Coordinator or other Senior ICSW Official becomes aware that Title IX Prohibited Conduct is alleged to have occurred, ICSW has an obligation to review the available information and determine whether to proceed to an Investigation.

In this context, Privacy and Confidentiality have distinct meanings.

- **Privacy** means that information related to a complaint will be shared with only a limited

number of ICSW employees who “need to know” in order to assist in the assessment, Investigation, and resolution of the report. All employees who are responsible for ICSW’s response to Title IX Prohibited Conduct receive specific training and guidance about sharing and safeguarding private information in accordance with state and federal law. The privacy of student education records will be protected in accordance with the Family Educational Rights and Privacy Act (“FERPA”), and the privacy of employee records will be protected in accordance with Illinois law and ICSW policy.

- **Confidentiality** exists in the context of laws that protect certain relationships, including those who provide services related to medical and clinical care, mental health providers, counselors, and ordained clergy. The law creates a privilege between certain health care providers, mental health care providers, attorneys, clergy, spouses, and others, with their patients, clients, parishioners, and spouses. ICSW has designated individuals who have the ability to have privileged communications as Confidential Resources.

ICSW will make reasonable and appropriate efforts to preserve an individual’s privacy and to protect the Confidentiality of information. However, because of laws relating to reporting and other state and federal laws, ICSW cannot guarantee Confidentiality relating to incidents of Title IX Prohibited Conduct except where those reports are privileged communications to Confidential Resources. Even then, there are exceptions to maintaining Confidentiality set by law; for example, physicians and nurses who treat any physical injury sustained during a sexual assault are required to report it to law enforcement. Also, physicians, nurses, psychologists, psychiatrists, teachers and social workers must report a sexual assault committed against a person under age 18.

Except for Confidential Resources, information shared with other individuals is not legally protected from being disclosed. However, ICSW takes requests for Privacy and Confidentiality seriously, to the extent it can do so while at the same time fulfilling its responsibility to provide a safe and nondiscriminatory environment for all students and the ICSW community. ICSW in such circumstances will make sure the Complainant is aware he/she/they are protected from Retaliation.

Should a Complainant make a request that ICSW not disclose the Complainant’s identity to the Respondent, the Title IX Coordinator will inform the Complainant that ICSW’s ability to respond to the allegations and investigate may therefore be limited if the request is granted. A Complainant who initially requests Confidentiality is not prohibited from later requesting that ICSW conduct a full Investigation.

Whether or not the Complainant requests confidentiality, ICSW will keep private the identity of all Complainants, Respondents, and Witnesses, except as necessary to carry out this procedure or as may be required by FERPA or other law.

3. Emergency Removal/Administrative Leave

a. Individualized Safety and Risk Analysis

Based on an Initial Report or Formal Complaint of Title IX Prohibited Conduct, the Title IX Coordinator, in consultation with the Threat Assessment Team or others as appropriate, may undertake an individualized safety and risk analysis to determine whether the allegations indicate the Respondent poses an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Title IX Prohibited Conduct. If ICSW determines removal is appropriate, the Respondent will be provided with notice and an opportunity to challenge the decision immediately following the removal.

b. Administrative Leave of a Non-Student Respondent

ICSW may place a non-student Respondent on administrative leave after notice of a report of Title IX Prohibited Conduct and during the pendency of resolution of the matter.

B. Filing a Formal Complaint

After the Initial Report, the Title IX Procedure will not move forward until a Formal Complaint is filed. A Formal Complaint can be filed in one of two ways:

1. Complainant submits Formal Complaint. A Complainant may complete and sign a Formal Complaint alleging Title IX Prohibited Conduct against a Respondent and requesting that ICSW Investigate the allegation of Title IX Prohibited Conduct.

a. At the time of filing a Formal Complaint, a Complainant must be participating in or attempting to participate in one of ICSW's Programs or Activities.

2. Title IX Coordinator submits Formal Complaint. The Title IX Coordinator may complete and sign a Formal Complaint.

b. A Complainant may request that ICSW not proceed with an Investigation or further resolution under this Procedure. A Complainant's wishes with respect to whether ICSW Investigates will be respected unless the Title IX Coordinator determines that signing a Formal Complaint over the wishes of the Complainant is not clearly unreasonable in light of the known circumstances.

- The Title IX Coordinator will inform the Complainant that due to various federal and state laws and/or in order to protect the safety of the campus community some circumstances require ICSW to move forward with an Investigation, even if the Complainant requests otherwise. ICSW's decision is subject to a balancing test that requires ICSW to consider a range of factors, including:
- The status of the Respondent and whether the Respondent has authority over students and/or staff.
- Whether there have been multiple reports of Title IX Prohibited Conduct (or other violations of Student, faculty and staff handbooks)

relating to a single Respondent;

- The seriousness of the alleged Title IX Prohibited Conduct (e.g., whether the alleged conduct involved a weapon, physical restraints or battery);
- Whether there is a likelihood that the Respondent would be a danger to the Complainant or the ICSW community;
- The age of the Complainant;
- Whether the report of Title IX Prohibited Conduct can be effectively addressed through another type of intervention; and
- The ability of ICSW to obtain relevant evidence.

C. Receipt of Formal Complaint of Title IX Prohibited Conduct

1. Notice of Formal Complaint. Upon receipt of a Formal Complaint, ICSW will provide a Notice of Formal Complaint to the Parties for whom ICSW knows their identity, including the following details:

- a. A description of ICSW's Title IX Procedure, including any informal resolution process.
- b. A description of the allegations including sufficient details known at the time such as:
 - the identities of the Parties involved in the incident;
 - the conduct allegedly constituting Title IX Prohibited Conduct; and
 - the date and location of the alleged incident.
- c. A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of a Hearing.
- d. A statement that the Parties may have an advisor of their choice, whomay be, but is not required to be, an attorney, and may inspect and review evidence as described herein.

The Notice of Formal Complaint will be provided with sufficient time to respond and prepare for any investigative interviews.

Once a Notice of Formal Complaint is issued, a Respondent student's ability to receive a degree is placed on hold.

After receiving Notice of Formal Complaint, both the Complainant and the Respondent will be asked to identify any academic, employment, or other significant conflicts that would affect the timing of the Investigation and potential Hearing. The Adjudicator will consider this input in finalizing any Hearing Schedule.

2. Ongoing Notice Requirement. If, in the course of an Investigation, ICSW decides to investigate allegations about the Complainant or Respondent that are not included in the initial Notice of Formal Complaint provided, ICSW will provide notice of the additional allegations to the Parties whose identities are known.

D. Rights and Responsibilities of Parties and Witnesses

During an Investigation and Hearing under this Title IX Procedure, the Parties and Witnesses have the following responsibilities and rights.

1. Responsibilities of the Parties and Witnesses

- a. The responsibility to be truthful, to cooperate with the process, and to follow the directions of ICSW staff and agents responsible for administering this process;
- b. The responsibility not to Retaliate against or Intimidate (see Section V.A.) any individual who has reported Title IX Prohibited Conduct or who has participated as a Party or Witness in the process; and
- c. The responsibility to keep private (by not disseminating beyond Advisors) documents, materials, and information received from ICSW during this process; and,
- d. The responsibility to destroy, when so directed by ICSW, evidentiary materials and/or writings submitted by the other Party as party of the process.

2. Rights of all Parties and Witnesses

- a. The right to be protected from Retaliation and Intimidation (see Section V.A., below) where one has reported Title IX Prohibited Conduct or participated as a Party or Witness in the process;
- b. The right to exercise First Amendment rights and not be subject to investigation for Retaliation for the exercise of such rights;
- c. The right to receive information regarding consequences for knowingly making false statements or knowingly submitting false information during the Title IX Procedure under the corresponding handbook associated with the party.

3. Rights of Student Parties and Student Witnesses

- a. The right not to be disciplined for drug and alcohol violations (relating to voluntary ingestion) or similar Fundamental Standard offenses in connection with the reported incident that do not place the health or safety of any other person at risk;
- b. For student Parties, the right to two hours of consultation time with an ICSW-Identified Attorney, at no cost to the student Party, at any time after a Notice of Formal Complaint is issued (as described in Section IV.G.1.b.).

4. Rights of all Parties

- a. The right to be treated equitably and receive the same equitable access to Supportive Measures;
- b. The right to have each phase of the Title IX Procedure completed within a reasonably prompt timeframe (as set forth in Appendix C);
- c. The right to a Process Support Person to support and/or advise the Party (as described in Section IV.H.1.a.);
- d. The right to receive a Notice of Formal Complaint that provides sufficient detail about the allegations and the applicable ICSW policies for the Respondent to be able

- to respond and for both Parties to understand the scope of the Investigation;
- e. The right to decline to give a statement about the allegations or attend a Hearing;
 - f. The right to participate in the Investigation, including by identifying fact Witnesses and Expert Witnesses and identifying and/or providing inculpatory, exculpatory and other relevant information and evidence to the Investigator;
 - g. The right to receive any Notice of Dismissal (as described in Section IV.I.1.d.);
 - h. The right to appeal any Notice of Dismissal (as described in Section IV.I.1.e.);
 - i. The right to review all evidence directly related to the allegations, in electronic format or hard copy, with at least 10 days for the Parties to inspect, review, and respond to the evidence.
 - j. The right to receive an Investigative Report that fairly summarizes relevant evidence, in electronic format or hard copy, with at least 10 days for the Parties to respond;
 - k. The right to have the matter heard at a live Hearing by a neutral Adjudicator who will determine the matter using a Preponderance of the Evidence standard and who will not prejudge the outcome of a case;
 - l. The right to a Hearing Support Person (as described in Section IV.H.1.d.) who will conduct oral cross-examination at the live Hearing on behalf of the Party;
 - m. The right to jointly agree with the other Party to waive cross-examination through the Hearing Advisors and instead submit written cross-examination questions to the Adjudicator to conduct the examination. Parties will not be pressured to make this election or be penalized in any way for electing to conduct cross-examination through their advisor;
 - n. The right to receive a Written Determination Regarding Responsibility (if any) (as described in Section IV.K.6.);
 - o. The right to appeal the Written Determination Regarding Responsibility to a neutral Appeal Officer (as described in Section IV.K.7.); and
 - p. The right to receive a Notice of Outcome of Appeal.

5. Rights of the Respondent

- a. The right not to have any disciplinary Sanctions imposed before a finding of responsibility in accordance with this Title IX Procedure; and
- b. The right to be presumed not responsible for the alleged Title IX Prohibited Conduct until a determination regarding responsibility is made at the conclusion of the Hearing.

E. Initial Assessment of Formal Complaint

The Title IX Coordinator shall make an initial assessment as to whether the Formal Complaint on its face alleges an act of Title IX Prohibited Conduct is covered by this Title IX Procedure. If it does not, ICSW will dismiss the matter as described below.

1. Dismissal of Formal Complaints Prior to Investigation or Resolution

a. Dismissal Prior to Investigation. If the assessment above determines that the conduct alleged in the Formal Complaint would not constitute Title IX Prohibited Conduct even if true, did not occur against a person in the United States, or there is not enough information to carry out the Title IX Procedure (for example, the identities of the people involved are unknown), then ICSW shall dismiss the Formal Complaint for purposes of this Title IX Procedure. If the Formal Complaint alleges multiple claims that arise out of the same facts and circumstances, and the Title IX Coordinator determines that some conduct is covered under Title IX and some is not, all claims may proceed together to be resolved under this Title IX Procedure. If, however, some claims do not arise out of the same facts and circumstances, are not covered by Title IX, and could violate other ICSW policy, that conduct will be dismissed and referred to another ICSW process, and the Title IX Procedure will proceed with respect to the covered conduct only. Any conduct dismissed under this Title IX Procedure that could constitute a violation of Student, faculty and staff handbooks or any other ICSW policy may be handled through other applicable ICSW processes.

b. Notice of Dismissal Prior to Investigation. Upon dismissal, ICSW shall send a Notice of Dismissal including the reason(s) therefore simultaneously to the Parties, within 7 calendar day of receipt of formal complaint.

F. Information Resolution

1. Informal Resolution Process

At any time after a Formal Complaint is filed, the Title IX Coordinator may, in their discretion, choose to offer and facilitate an Informal Resolution process, so long as both Parties give voluntary, informed, written consent to attempt Informal Resolution. ICSW may not require the Parties to participate in an Informal Resolution process or require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to a formal Investigation and adjudication of Formal Complaints of Title IX Prohibited Conduct. Any person who facilitates an Informal Resolution will be experienced and trained in dispute resolution and trained on this Title IX Procedure.

2. Withdrawing from an Informal Resolution Process

At any time prior to agreeing to an Informal Resolution, any Party has the right to withdraw from the Informal Resolution process and resume the process with respect to the Formal Complaint.

3. Matters Not Eligible for Informal Resolution

- a.** No Informal Resolution process will be offered before a Formal Complaint is filed.
- b.** No Informal Resolution process will be offered to resolve Formal Complaints involving a student as Complainant and a staff or faculty member as Respondent.

G. Investigation

For any allegations in any Formal Complaint not subject to dismissal under this Title IX Procedure, the matter will proceed to an Investigation. The formal Investigation phase is the period during which the Investigator gathers information about the allegations. This period of time is the Parties' opportunity to provide input regarding the collection of evidence, but the burden of gathering evidence and the burden of proof is on ICSW. ICSW may, in its discretion, consolidate the Investigation of multiple Formal Complaints where the allegations arise out of the same facts.

1. Support During the Investigation and Hearing Process

a. Advisors. The Advisor may assist a Party on written submissions provided they are verified by the Party. The Process Support Person does not speak or advocate on behalf of the Party in ICSW proceedings, except as provided in Section IV.H.1.d., below. Any Process Support Person who violates these expectations may not be permitted to participate further in the process or as a Support Person.

Only one advisor will be allowed to accompany a Party to meetings with Investigators (including meetings that occur using technology, such as Zoom).

b. Title IX Coordinator/ICSW-Identified Advisor for Student Parties. ICSW has trained Title IX Coordinator to serve as Process Advisors for all Parties in all ICSW processes involving sexual harassment, sexual violence, relationship violence and stalking. Title IX Coordinator are available by appointment for consultation to students, staff and faculty to discuss all available ICSW procedures to resolve violations of Student, faculty and staff handbooks, including this Title IX Procedure. Title IX Coordinator are intended to maintain Privacy and Confidentiality to the extent permitted by law. This means that Title IX Coordinator do not have a responsibility to report information to others at ICSW and – except to the extent a Title IX Coordinator needs to share information to protect life – will hold in confidence information shared by community members. Note, however, that courts are not required to recognize the Confidentiality of Title IX Coordinator, and ICSW may be compelled by a court to disclose information or documents shared with a Title IX Coordinator.

Once a Notice of Formal Complaint is issued by ICSW, each Party will be offered a Title IX Coordinator to assist the Party as a Process Support Person. A Party may decline to work with a Title IX Coordinator, may decline to follow the advice of a Title IX Coordinator, and may work with their own identified Process Support Person.

c. Attorney as Process Support Person. Each Party may elect to identify an attorney to serve as an advisor. Such an individual is obligated to follow the requirements for Advisors stated in Section IV.H.1.a., above. While an advisor may be an attorney, the attorney has no different role in the process and serves as an advisor in the same capacity as a non-attorney, except as provided in Section IV.H.1.d., below.

d. Hearing Support Person/ICSW-Identified Advisors. As described in Section IV.K.4.a., below, if the matter proceeds to a Hearing, all oral cross-examination must be conducted by a Party's

Hearing Support Person (which may be the same as the Party's Process Support Person), not by the Parties themselves. If a Party arrives at a Hearing without a Hearing Support Person, ICSW will designate an advisor of ICSW's choosing to conduct the oral cross-examination on behalf of the Party.

In the event a matter proceeds to a Hearing, an ICSW-Identified Advisor will be made available to all Parties for assistance with the Hearing stage. The ICSW-Identified Advisor will provide guidance around Hearing preparation, conduct cross-examination during a Hearing, and may provide assistance during an appeal period. Parties are not obligated to use this resource or to follow any guidance provided by an advisor. Should Parties wish to avail themselves of this resource, they should contact the Title IX Office to obtain the list of advisors. Each Party is responsible for selecting their own ICSW- identified Advisor from this list. If a student Party has elected to use an ICSW- Identified Advisor for consultation prior to the Hearing stage, and elects to use this resource for the Hearing stage, the student Party will be offered the same ICSW- Identified Advisor that provided the consultation services to serve as the student Party's Hearing Support Person. A student Party may choose a different ICSW-Identified Advisor from the list to serve as the Hearing Support Person, but the student will not get another two hours of consultation time if the student Party switches ICSW-Identified Advisor.

While Parties are not required to have an ICSW-identified advisor for the Hearing and are otherwise permitted to engage an attorney, ICSW will not reimburse Parties for such services.

H. Investigation Process

- a. **Investigator.** The Title IX Coordinator will designate an individual to conduct the Investigation of a Formal Complaint.
- b. **Notice of Interviews, Meetings or Hearings.** The Title IX Coordinator will send the Parties and their Advisors advance written notice of any investigative interviews, meetings, or Hearings at which the Party is expected to be present. These notices will be sent out at least 10 business days prior to these sessions.
- c. **Method of Information Gathering.** The Investigator may gather information in multiple ways. The Investigator may collect relevant documents and other information and may also interview Parties and/or Witnesses. In addition, a Complainant or Respondent may:
 - i. submit documentary information to the Investigator;
 - ii. submit a list of Witnesses to be interviewed by the Investigator; and/or
 - iii. request that the Investigator attempt to collect documents and other information that are not accessible to the requesting Party.
 - iv. **Disclosure of information.** After the Investigator has concluded the collection of evidence, ICSW will send the Parties and their Advisors evidence directly related to the allegations, in electronic format or hard copy, with at least 10 days for the Parties to inspect, review, and

respond to the evidence.

- v. **Investigative Report.** After the Investigator has received the Parties' response to the evidence, the Investigator will complete the Investigative Report that fairly summarizes the relevant evidence. The Title IX Coordinator will make the Investigative Report available to the Parties and their Advisors in electronic format or hard copy, with at least 10 days for the Parties to respond. In the event the determination is made to dismiss the Formal Complaint (see below), that information will be included in the Investigative Report.

H. Post-Investigation Options

1. Dismissal of Formal Complaint after Investigation

- a. **Mandatory Dismissal.** ICSW must dismiss the Formal Complaint if after the Investigation it is determined by the Title IX Coordinator that the conduct alleged in the Formal Complaint does not constitute Title IX Prohibited Conduct or did not occur against a person in the United States. If the Formal Complaint alleges multiple claims that arise out of the same facts and circumstances, and the Title IX Coordinator determines that some conduct is covered under Title IX and some is not, all claims may proceed together to be resolved under this Title IX Procedure. If, however, the Title IX Coordinator determines some claims do not arise out of the same facts and circumstances, are not covered by Title IX, and could violate other ICSW policy, that conduct will be dismissed and referred to another ICSW process, and the Title IX Procedure will proceed with respect to the covered conduct only.
- b. **Discretionary Dismissal.** ICSW may dismiss the Formal Complaint if:
 - i. The Respondent is no longer enrolled or employed by ICSW;
 - ii. Specific circumstances prevent ICSW from gathering sufficient evidence to reach a determination; or
 - iii. The Complainant informs the Title IX Coordinator in writing that the Complainant desires to withdraw the Formal Complaint or allegations therein.
 - 1. A Complainant may notify the Title IX Coordinator at any time that the Complainant does not wish to proceed with the Investigation and/or Hearing process. If such a request is received, the Title IX Coordinator will inform the Complainant that ICSW's ability to respond to the allegation may be limited if the allegations are withdrawn.
 - 2. The Title IX Coordinator will consider the factors in Section IV.B.2.b. in reaching a determination as to whether to terminate the Investigation and/or Hearing process. In the event that the Title IX Coordinator determines that the Investigation will continue, the Title IX

Coordinator will notify the Complainant of that determination. The Title IX Coordinator will include in that notification a statement that the Complainant is not required to participate in the Investigation and/or Hearing process but that the process will continue. In the event that the Title IX Coordinator determines that the Investigation will be terminated, both Parties will be notified.

- c. **Referral.** In the event of dismissal after the Investigation (mandatory or discretionary), the Title IX Coordinator may refer some or all of the matter for consideration under another applicable ICSW policy or procedure, if any.
- d. **Notice of Dismissal after Investigation.** Upon dismissal, ICSW shall promptly send a Notice of Dismissal (mandatory or discretionary) and reason(s) therefore simultaneously to the Parties.
- e. **Right to Appeal Notice of Dismissal.** The Parties may appeal a Notice of Dismissal. Each Party may submit a written appeal of up to 6,000 words in length, which will be shared with the other Party. The Parties must submit the appeal by the date determined by the Title IX Office, generally ten calendar days from the receipt of the Notice of Dismissal. The appeal is submitted to an External Sexual Harassment/Assault Process Specialist and will be limited to the following grounds:
 - i. Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the Complainant?
 - ii. Was there any substantive new evidence that was not available at the time of the decision that could not have been available based on reasonable and diligent inquiry that would substantially affect the outcome of the decision?
 - iii. Is the decision one that a reasonable person might have made?

Upon receipt of a Party's appeal, the Adjudicator will share it with the other Party. Each Party may submit a response to the other Party's appeal (no more than 3,000 words). Each Party must submit this response by the date determined by the Adjudicator, generally seven (7) calendar days after the other Party's appeal has been shared. The appealing Party will have access to the other Party's response to the appeal, but no further responses will be permitted.

The Title IX Coordinator is permitted, but not required, to file a response to a Party's appeal to respond to concerns relating to procedural irregularities including the Investigation. The Title IX Coordinator may submit one response for each Party that files an appeal (that raises a procedural irregularity). Each response by the Title IX Coordinator should be no more than 1,500 words. The Parties will have access to the

Title IX Coordinator response(s) to the appeal, but no further responses will be permitted.

The remedy is limited to directing the Title IX Coordinator to issue a Notice of Charge and proceed to a Hearing.

2. Notice of Charge/Setting of Hearing. For any Formal Complaints not subject to Dismissal or Informal Resolution after Investigation, the matter will proceed to a Hearing. The Title IX Coordinator will notify both the Complainant and the Respondent in writing that the matter has been charged and referred to an Adjudicator to decide the matter. The Adjudicator will promptly set the Hearing based on the availability of the Parties and Witnesses.

I. Pre-Hearing Process

1. Creating of Hearing File. The Adjudicator (working with the Investigator) will create the initial Hearing File within seven (7) calendar days after the issuance of the Notice of Charge. However, in more complex cases involving, for instance, multiple allegations and/or Witnesses, the creation of the Hearing File may take longer. Before the Hearing File is made available to the Parties, the Investigator/Adjudicator will redact personally identifying information from the Hearing File, such as phone numbers, addresses, and medical information. The Investigator/Adjudicator will also propose redactions of non-permissible and unrelated information in the Hearing File, and highlight those proposed redactions to the Parties. The Parties will receive electronic access to view the Hearing File. Parties will also receive a log describing gathered materials that were not included in the Hearing File.

a. Expert Witness. Expert Witnesses may be permitted only if:

- i. the Adjudicator needs special expertise in order to understand a technical matter, such as relevant forensic evidence;⁸
- ii. an understanding of that technical matter is likely to affect the Adjudicator's finding; and/or
- iii. there is not a more efficient method of obtaining the information necessary to resolve that technical matter.

If allowed, an Expert Witness may be retained by a Party or by the Title IX Office. If an Expert Witness is retained by a Party, that Party will be responsible for any costs incurred, and the other Party will be allowed to respond to that Expert's written or oral testimony. If an Expert Witness is consulted by the Title IX Office and the expert's opinion or testimony is included in the Hearing File or offered to the Adjudicator, the Parties will be allowed to respond to that Expert's written or oral testimony. A Party's Expert Witness must be identified in the Investigation phase, unless good cause is shown as to a late discovery of need for such testimony, and must be willing to submit to an interview with the investigator, in part to determine whether the proposed testimony meets the standard set forth above.

b. Medical Records. For purposes of this Title IX Procedure, ICSW will not access, consider, disclose, or otherwise use a Party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the Party, unless ICSW obtains that Party's voluntary, written consent to do so.

c. New Evidence and/or Rebuttal Evidence. New Evidence is evidence that was not available at the time of the charge decision, could not have been available based on reasonable and diligent inquiry, and is relevant to the matter.

Rebuttal Evidence is evidence presented to contradict other evidence in the Hearing File, which could not have been reasonably anticipated by a Party to be relevant information at the time of the Investigation.

New Evidence and Rebuttal Evidence may be included or excluded from the Hearing File, as described in Section IV.1.2., below, but in no event is this section intended to permit a Party who has declined to give a statement about the incident during the Investigation to give such a statement for the first time after the Hearing File has been created. This section is intended to be invoked in rare instances to allow for the inclusion of information that was not available during the Investigation or that could not have been reasonably anticipated to be relevant to rebut an issue that came to light.

2. Evidentiary Review Process If a Party objects to evidence included or excluded from the Hearing File, or if a Party wants to submit New Evidence and/or Rebuttal Evidence after the Parties have viewed the file, the Party may make a written request to have evidentiary concerns considered by the Adjudicator. Requests to review evidentiary concerns should include all evidentiary issues in one document, which should be no more than 1,500 words in length (including headers, footnotes, captions, charts, audio and/or video statements, and everything else except for the submission of proposed new or rebuttal evidence). New Evidence and/or Rebuttal Evidence, if any, should be attached to the written request and submitted to the Adjudicator, who will forward all information from the Parties to the Adjudicator.

In order to consider the objections to the Hearing File, the Adjudicator will have access to all materials gathered by the Investigator during the Investigation. The Parties must submit the objections by the date set in the Hearing Schedule, generally five (5) calendar days after the date the Hearing File is made available to the Parties. The Title IX Coordinator is permitted, but not required, to submit responses to the Parties' evidentiary objections to the Adjudicator. The Adjudicator has the authority to make all evidentiary decisions relating to what information is relevant; that is, what information should be included or excluded from the Hearing File. When the Adjudicator proposes to add New or Rebuttal Evidence to the file that not all Parties have reviewed, the Adjudicator is permitted to grant Parties the opportunity to review and bring forward evidentiary issues, limited to the New or Rebuttal Evidence that was added.

During the Hearing, Parties, Advisors, and Witnesses must comply with the evidentiary decisions that have been made by the Adjudicator.

Objections to the inclusion or exclusion of evidence cannot be the basis for appeal unless they were made through the Evidentiary Review process before the Hearing. The standard for review of evidentiary decisions on appeal will be whether the evidentiary decision was clearly erroneous and substantially affected the Adjudicator's decision to the detriment of the appealing Party.

3. Response Statement to Hearing File. Each Party may submit a written statement of their position to the Adjudicator that is no more than 1,500 words in length (including headers, footnotes, captions, charts, audio and/or video statements).

- a. This statement is each Party's opportunity to respond to the Hearing File and the charges made and to provide a statement to the Adjudicator about what the Party believes the evidence shows.
- b. No attachments will be accepted; references to evidence should be made to material in the Hearing File.
- c. No New and/or Rebuttal Evidence may be submitted.
- d. No information may be submitted that goes beyond the scope of the matter that is charged.

The Parties must submit this statement by the date set in the Hearing Schedule (see Appendix C), but generally five (5) calendar days from the date the Hearing File is made available to the Parties.

The Adjudicator, in consultation with the Investigator, will remove information from a position statement that goes beyond the scope of the charge.

4. Hearing Schedule. Within seven (7) days of when the Notice of Charge is issued, the Adjudicator will reach out to all Parties, Witnesses, and the Adjudicator to that schedule key dates for the matter (Hearing Schedule). The Hearing Schedule will take into consideration the academic and other conflicts identified in response to the Written Notice of Formal Complaint. Unless an extension is granted based on a showing of good cause, the Parties are obligated to follow the Hearing Schedule. The Hearing Schedule will be case-specific but generally will follow the timeframes set forth in Appendix C.

J. Hearings

1. Format of Hearing. Hearings may be conducted with all Parties physically present in the same geographic location or, at ICSW's discretion, any or all Parties, Witnesses, and other participants may appear at the live Hearing virtually, with technology enabling participants simultaneously to see and hear each other. At the request of either Party, ICSW will provide for the Hearing to occur with the Parties located in separate rooms with technology enabling the decision-maker(s) and Parties to simultaneously see and hear the Party or the Witness answering questions.

2. Recording of the Hearing. Hearings will be transcribed or recorded through audio or audiovisual means, and ICSW will make the transcript or recording available to the Parties for inspection and review upon request.

3. Role of Hearing Advisors. If a Party does not have a Hearing Support Person present at the Hearing, ICSW will provide without fee or charge to that Party, a Hearing Support Person of ICSW's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that Party.

4. Role of the Adjudicator. The Adjudicator will be a neutral decision-maker experienced and trained in adjudicating matters of civil rights, sexual harassment and/or sexual violence and trained on this Title IX Procedure. The Adjudicator will preside over the Hearing and will issue the Written Determination Regarding Responsibility.

The Adjudicator will be identified to the Parties before the Hearing at least three days prior to the Hearing. Additionally, no person who has a conflict of interest may serve as the Adjudicator. A conflict of interest exists if the Adjudicator has prior involvement in or knowledge of the allegations at issue in the case, has a personal relationship with one of the Parties or Witnesses, or has some other source of bias.

Either Party may assert, in writing, that an Adjudicator has a conflict of interest. A request to recuse an Adjudicator based on a conflict must be submitted within 1 business day's receipt of the name of the Adjudicator. The request is submitted to the Adjudicator. A determination will be made whether an Adjudicator has a conflict of interest, and if so that Adjudicator will be replaced by an alternate.

At the Hearing, the Adjudicator will:

a. Permit Cross-examination. At the Hearing, the Adjudicator will permit each Party's Hearing Support Person to ask the other Party and any Witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the Hearing must be conducted directly, orally, and in real time by the Party's Hearing Support Person of choice and never by a Party personally. The Parties may, however, jointly agree in advance to waive oral cross-examination and instead submit written cross-examination to the Adjudicator to conduct the examination. Even if the Parties so agree, the Parties are still required to have a Hearing Support Person present at the Hearing. ICSW has discretion to otherwise restrict the extent to which Hearing Support Person may participate in the proceedings.

b. Determine Relevance of Questions. Only relevant cross-examination and other questions may be asked of a Party or Witness. Before a Complainant, Respondent, or Witness answers a cross-examination or other question, the Adjudicator must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

c. Provide Rape Shield Protections for Complainants. The Adjudicator will prohibit any questions and evidence about the Complainant's sexual predisposition or prior sexual behavior as not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific

incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

5. Hearing Process

The Investigator will be available to answer any questions from the Adjudicator about the Investigation.

The Adjudicator may meet with the Parties and Witnesses for the purpose of making findings of fact. The Parties and Witnesses may not speak to matters beyond the scope of the Hearing File (for example, by raising potential misconduct allegations that go beyond the scope of the charged conduct). Parties and Witnesses must not disclose or reference information to the Adjudicator that was excluded from the Hearing File. The Adjudicator may ask questions of the Parties and/or Witnesses.

Parties are permitted to listen to Witnesses as they are speaking to the Adjudicator. The Adjudicator is not obligated to speak to all Witnesses.

6. Written Determination Regarding Responsibility.

The Adjudicator shall issue a Written Determination Regarding Responsibility, applying the Preponderance of the Evidence standard (as required by Illinois law), which shall include:

- a.** Identification of the allegations potentially constituting Title IX Prohibited Conduct;
- b.** A description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the Parties, interviews with Parties and Witnesses, site visits, methods used to gather other evidence, and Hearings held;
- c.** Findings of fact;
- d.** Conclusions about whether the alleged Title IX Prohibited Conduct occurred, applying the definitions set forth in this Title IX Procedure to the facts;
- e.** The rationale for the result as to each allegation;
- f.** Any disciplinary Sanctions imposed on the Respondent;
- g.** Whether Remedies or Supportive Measures will be provided to the Complainant; and
- h.** Information about how to file an appeal.

The Adjudicator may ask the Parties to submit Sanctions statements at the conclusion of the Hearing. The Adjudicator may also consult with ICSW personnel regarding any Sanctions and Remedies appropriate to the specific Respondent and Complainant using the guidelines provided in Appendix B.

The Sanction determination will be provided to the Title IX Coordinator who will be responsible for implementing the Supportive Measures and/or Remedies, including the continuation of any Supportive Measures and/or any additional or on-going accommodations for both Parties. The Title IX Coordinator will cause the Written Determination Regarding Responsibility to be sent to

the Parties. The Title IX Coordinator will provide copies of the Written Determination Regarding Responsibility and Sanctions and/or Remedies (if any) for the purpose of maintaining records as follows:

- a.** For students, to the Office of Academic Affairs
- b.** For staff, to ICSW Human Resources
- c.** For faculty, to the Academic Dean
- d.** For postdoctoral scholars and fellows, to the appropriate administrative manager

The Adjudicator must explain decisions on responsibility and Sanctions (if applicable) and Remedies with enough specificity for the Parties to be able to file meaningful appeals.

The consideration of whether Remedies and Sanctions go into immediate effect or are held in abeyance pending appeal or some combination thereof, will be determined on a case- by-case basis by the Title IX Coordinator.

The Written Determination Regarding Responsibility becomes final:

- a.** if an appeal is not filed, the date on which an appeal would no longer be considered timely; or
- b.** if an appeal is filed, on the date that ICSW provides the Parties with the written determination of the result of the appeal.

7. Appeal of a Written Determination Regarding Responsibility

a. Submission of Appeal

Both Parties have the right to an appeal from a Written Determination Regarding Responsibility on the bases set forth below. Appeals may be submitted by a Complainant or Respondent in writing to the Adjudicator, who will forward the appeal to a designated Appeal Officer to decide the appeal. The Appeal Officer will be a professional neutral decision-maker (such as a retired judge) experienced and trained in adjudicating matters of civil rights, sexual harassment and/or sexual violence and trained on this Title IX Procedure. The Appeal Officer will not have a current affiliation with ICSW.

Each Party may submit a written appeal of up to 6,000 words in length, which will be shared with the other Party. The Parties must submit the appeal by the date determined by the Title IX Office, generally ten (10) calendar days from the receipt of the Written Determination Regarding Responsibility (if any).

The grounds for appeal are limited to the following:

1. Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the appealing Party
2. Was there any substantive new evidence that was not available at the time of the decision or Hearing and that could not have been available based on reasonable and diligent inquiry that would substantially affect the outcome

- of the decision?
3. Did the Title IX Coordinator, Investigator(s), or Adjudicator have a conflict of interest or bias for or against Complainants or Respondents that affected the outcome of the matter?
 4. For matters that proceeded to Sanctioning and imposition of Remedies, are the Sanction and/or Remedies ones that could have been issued by reasonable persons given the findings of the case?

In composing appeals, Parties should format their arguments following these four grounds as the organizational structure.

Upon receipt of a Party's appeal, the Adjudicator will share it with the other Party. Each Party may submit a response to the other Party's appeal (no more than 3,000 words). Each Party must submit this response by the date determined by the Adjudicator, generally ten (10) calendar days after the other Party's appeal has been shared. The appealing Party will have access to the other Party's response to the appeal, but no further responses will be permitted.

The Title IX Coordinator is permitted, but not required, to file a response to a Party's appeal to respond to concerns relating to procedural irregularities or bias in the Investigation and Hearing process. The Title IX Coordinator may submit one response for each Party that files an appeal (that raises a procedural irregularity). Each response by the Title IX Coordinator should be no more than 1,500 words. The Parties will have access to the Title IX Coordinator's response(s) to the appeal, but no further responses will be permitted.

b. Appeal Decision.

The Appeal Officer will provide the Notice of Outcome of Appeal no later than ten (10) calendar days after receipt of all appeal documents.

As needed, the Appeal Officer will consult with the Title IX Coordinator regarding the management of ongoing Remedies. The Appeal Officer may reject the appeal in whole or in part, issue a new decision regarding responsibility, issue new or revised Sanctions and Remedies, or refer the matter to a new Adjudicator.

VI. ADDITIONAL INFORMATION AND APPENDICES

A. Retaliation and Intimidation

It is a violation of Student, faculty and staff handbooks to Intimidate or Retaliate against any person making a complaint or responding to a complaint under this Title IX Procedure or against any person participating in the Investigation of any such allegation under this Title IX Procedure (including being the Respondent or testifying as a Witness). No person may threaten, coerce, or discriminate against any individual for pursuing or exercising any right or privilege secured by Title IX, or because the individual has made a report or complaint, responded to a complaint, testified, assisted, or participated or refused to participate in any manner in an Investigation, proceeding, or Hearing related to this Title IX Procedure.

1. **Retaliation** includes, but is not limited to, adverse action related to employment, academic opportunities, participation in ICSW programs or activities, or similar punitive action.
2. **Intimidation** includes any threatening statement or conduct made with the intent to prevent or dissuade any Party or Witness from reporting or participating in the process.

All Parties to a concern and all persons participating in the Investigation of a concern are prohibited from engaging in actions intended to retaliate or intimidate directly or through support persons.

Charging an individual with a handbook violation for making a materially false statement in bad faith in the course of an Investigation does not constitute Retaliation, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any Party made a materially false statement in bad faith. The exercise of rights protected under the First Amendment does not constitute Retaliation.

Reports of alleged violations of ICSW Directives or Court Orders prior to a finding of responsibility either will be incorporated into the pending matter or referred separately to another ICSW process. After a Respondent has been found responsible for Title IX Prohibited Conduct, if there is a new allegation that the Respondent has engaged in Retaliation, Intimidation, or violated a Court Order or ICSW Directive relating to the matter, the Title IX Office will investigate the allegation and determine whether to refer the matter to be handled through another ICSW process.

B. Process for Evaluation Requests for Disability Accommodations

Parties or Witnesses may request disability-related accommodations from the Title IX Office. Upon receipt of a request for a disability-related accommodation, the Title IX Office will coordinate a meeting with the appropriate disability coordinator and the individual requesting the accommodation to explain the steps involved in the applicable Title IX process (*e.g.*, attorney meetings, interview, document submissions, Hearing). If a participant requests accommodations, if needed, an Investigation under this Title IX Procedure may be delayed (or that person's participation postponed) until the participant requesting such accommodations has had their request evaluated and, as appropriate, until accommodations have been implemented.

The appropriate disability coordinator will confirm with the participant their specific accommodation requests; the appropriate disability coordinator may coordinate with other ICSW offices, such as the Office of Accessible Education or Human Resources, to confirm existing accommodations.

In the circumstance that the Title IX Coordinator determines that the recommended accommodations create a fundamental alteration of the applicable review or Investigation process, the Title IX Coordinator will confer with the appropriate disability coordinator to identify alternate accommodations, if any. The Title IX Coordinator will provide a written statement of the accommodations that will be provided in the process.

If a Party seeking an accommodation does not agree with the statement of accommodations, the Party may seek written review of the accommodations from the appropriate disability

coordinator or their designee. The request to review the accommodations must be made in writing. The appropriate disability coordinator will review and respond to the request, generally within three (3) days. The accommodations recommended by the appropriate disability coordinator are final unless there is a change of circumstance. A Party who continues to be dissatisfied with accommodations may raise the concern as procedural error at the conclusion of a Hearing.

Appendix A: Definitions

Affirmative Consent: affirmative, conscious, and voluntary agreement to engage in sexual activity. It is the responsibility of each person involved in the sexual activity to ensure that the person has the Affirmative Consent of the other or others to engage in the sexual activity. Lack of protest or resistance does not mean Affirmative Consent, nor does silence mean Affirmative Consent. Affirmative Consent must be ongoing throughout a sexual activity and can be revoked at any time. Affirmative Consent may be based on a condition(s), *e.g.*, the use of a condom, and that condition(s) must continue to be met throughout an activity, unless there is mutual agreement to forego or change the condition. When there is no Affirmative Consent present during sexual activity, the activity at issue necessarily occurred “against the person’s will.”

Appeal Officer: a professional neutral decision-maker (such as a retired judge) experienced and trained in adjudicating matters of civil rights, sexual harassment and/or sexual violence and trained on this Title IX Procedure, who will review the Parties’ appeals and issue the Notice of Outcome of Appeal.

Complainant: the Party to the process who has allegedly experienced the alleged Title IX Prohibited Conduct at issue. ICSW uses this term to provide consistency with the Title IX regulations and many peer institutions. Use of this term does not necessarily indicate that this person either reported the conduct or requested that ICSW pursue the matter.

Confidential Resource: a person who by law is exempted from the obligation to report an allegation of conduct that could constitute Title IX Prohibited Conduct to any entity, including ICSW’s Title IX Coordinator or law enforcement in circumstances in which the reported conduct could be a crime (except, as to law enforcement, if the Complainant is a minor or if there is a belief that there is an imminent threat of harm to self or others).

Confidentiality: exists in the context of laws that protect certain relationships, including those who provide services related to medical and clinical care, mental health providers, counselors, and ordained clergy. The law creates a privilege between certain health care providers, mental health care providers, attorneys, clergy, spouses, and others, with their patients, clients, parishioners, and spouses.

Court Order: any formal order issued by a state or federal court or authorized police officer that restricts a person’s access to another ICSW community member, such as an emergency, temporary or permanent restraining order.

Dating Violence: violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the Complainant, including sexual or physical abuse or the threat of such abuse, but excluding acts covered under the definition of Domestic Violence.

Domestic Violence: a felony or misdemeanor crime of violence committed: (i) by a current or former spouse or intimate partner of the Complainant; (ii) by a person with whom the Complainant shares a child in common; (iii) by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner; (iv) by a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of California; (v) by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of California. To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.

Duress: a direct or implied threat of force, violence, danger, hardship, or retribution that is enough to cause a reasonable person of ordinary sensitivity to do or submit to something that they would not otherwise do or submit to. When deciding whether the act was accomplished by duress, all the circumstances, including the age of the Complainant and their relationship to the Respondent, are relevant factors.

Expert Witness: a Witness identified by a Party or the Title IX Office that has special expertise in a technical matter, such as forensic evidence.

External Sexual Harassment/Assault Process Specialist: a person with specialized knowledge in sexual harassment and sexual assault (such as a person with legal training) retained by ICSW, in the event of an appeal of a Notice of Dismissal.

Force: an act is accomplished by force if a person overcomes the other person's will by use of physical force or induces reasonable fear of immediate bodily injury.

Formal Complaint: a document filed and signed by a Complainant or filed and signed by the Title IX Coordinator alleging Title IX Prohibited Conduct against a Respondent and requesting that ICSW investigate the allegations.

Hearing: a live hearing conducted with all Parties physically present in the same geographic location or with participants appearing virtually with technology enabling participants simultaneously to see and hear each other. During the Hearing, the Adjudicator permits each Party's Hearing Support Person to ask the other Party and Witnesses all relevant questions and follow-up questions, including those challenging credibility. A recording or transcript of the hearing will be made.

Hearing Coordinator: the person who manages Hearings under this Title IX Procedure.

Hearing File: the information collected during the Investigation that is deemed relevant to be considered by the Adjudicator.

Adjudicator: a non-ICSW professional neutral decision-maker (such as a retired judge) experienced and trained in adjudicating matters of civil rights, sexual harassment and/or sexual violence and trained on this Title IX Procedure who will preside over the Hearing and will issue the Written Determination Regarding Responsibility.

Hearing Schedule: a time-table specific to each matter that schedules key dates for the matter after it has been charged.

Hearing Support Person: the person who will attend the Hearing with a Party and conduct the oral cross-examination of the other Party and Witnesses. The Hearing Support Person may be the same as the Party's Process Support Person.

Incapacitation: a person lacks the ability to voluntarily agree (that is, to give Affirmative Consent) to sexual activity because the person is asleep, unconscious, under the influence of an anesthetizing or intoxicating substance such that the person does not have control over their body, is otherwise unaware that sexual activity is occurring, or is unable to appreciate the nature and quality of the act. Incapacitation is not necessarily the same as legal intoxication.

Informal Resolution: a voluntary process that the Parties may consent to participate in, as described in Section IV.F.

Initial Report: a report of conduct that may constitute Title IX Prohibited Conduct, which may be made by any individual, even if not the person alleged to have experienced the conduct. An Initial Report is made prior to a Formal Complaint, and triggers the Title IX Coordinator's obligation to contact the Complainant and inform the Complainant of Supportive Measures, as described in Section IV.A.1.

Intimidation: includes any threatening statement or conduct made with the intent to prevent or dissuade any Party or Witness from reporting or participating in the Title IX Procedure.

Investigation: the phase of the Title IX Procedure when the Parties are invited to provide evidence and identify Witnesses to the Investigator related to the allegations in the Notice of Formal Complaint.

Investigative Report: a formal written document that fairly summarizes the relevant evidence gathered during the Investigation and that is provided to the Parties with at least 10 days to respond.

Investigator: the person assigned by the Title IX Coordinator to investigate Formal Complaints under this Title IX Procedure. The Investigator shall have been trained on all elements of an Investigation as required by federal and state law.

Menace: a threat, statement, or act showing intent to injure someone.

New Evidence: evidence that was not available at the time of the charge decision, could not have been available based on reasonable and diligent inquiry, and is relevant to the matter.

Nonforcible Sexual Violations: Any of the following acts:

- ***Incest.*** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by California law.
- ***Statutory Intercourse Violation.*** Nonforcible sexual intercourse with a person who is under the statutory age of consent of California. The age of consent in California is 18.

Notice of Charge: the formal notification issued by the Title IX Coordinator following an Investigation that the matter will be charged and will proceed to a Hearing.

Notice of Dismissal: the formal notification issued by the Title IX Coordinator following a determination that the matter does not meet the definitional or jurisdictional standards of Title IX and stating the reasons for dismissal.

Notice of Formal Complaint: the formal notification issued by the Title IX Coordinator that a Formal Complaint has been filed and including the details set forth in Section IV.C.1.

Notice of Outcome of Appeal: a written determination describing the Appeal Officer’s final decision of a matter brought forward on appeal.

Party/Parties: the generic or collective term used to refer to Complainant(s) and Respondent(s).

Preponderance of the Evidence: the standard of proof used by the Adjudicator. A finding by the Preponderance of the Evidence means that the credible evidence on one side outweighs the credible evidence on the other side, such that, as a whole, it is more likely than not that the alleged fact or conduct occurred. It does not mean that a greater number of Witnesses or documents is offered on one side or the other, but that the quality or significance of the evidence offered in support of one side is more convincing than the evidence in opposition.

Privacy: means that information related to a complaint will be shared with only a limited number of ICSW employees who “need to know” in order to assist in the assessment, Investigation, and resolution of the report. All employees who are responsible for ICSW’s response to Title IX Prohibited Conduct receive specific training and guidance about sharing and safeguarding private information in accordance with state and federal law. The privacy of student education records will be protected in accordance with the Family Educational Rights and Privacy Act (“FERPA”), and the privacy of employee records will be protected in accordance with California law and ICSW policy.

Rebuttal Evidence: evidence presented to contradict other evidence in the Hearing File, which could not have been reasonably anticipated by a Party to be relevant information at the time of the Investigation.

Remedies: individualized measures implemented after a Hearing or as part of an Informal Resolution that are designed to restore or preserve equal access to ICSW Programs or Activities, and may include Supportive Measures, but need not be non-disciplinary or non- punitive and need not avoid burdening the Respondent.

Respondent: the person alleged to have engaged in Title IX Prohibited Conduct.

Retaliation: includes, but is not limited to, adverse action related to employment, academic opportunities, participation in ICSW programs or activities, or similar punitive action taken against an individual because that person has made an Initial Report or Formal Complaint, responded to a Formal Complaint, testified, assisted, or participated or refused to participate in any manner in an Investigation, proceeding, or Hearing.

Sanctions: individualized measures implemented after a Hearing that may be disciplinary in nature, as described in Appendix B.

Senior ICSW Official: employees of ICSW (other than the Title IX Coordinator) with authority to institute corrective measures on ICSW's behalf, and for whom notice of a report of Title IX Prohibited Conduct constitutes actual knowledge of ICSW. At ICSW these individuals include: the President and Academic Dean.

Sexual Assault: Any of the following acts:

- **Rape.** Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the Complainant.
- **Sodomy.** Oral or anal sexual intercourse with another person:
 - forcibly and/or against that person's will; OR
 - not forcibly or against the person's will (non-consensually) in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.
- **Sexual Assault with an Object.** To use an object or instrument to penetrate, however slightly, the genital or anal opening of the body of another person:
 - forcibly and/or against that person's will; OR
 - not forcibly or against the person's will (non-consensually) in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.
- **Fondling.** The touching of the private body parts of another person (buttocks, groin, breasts) for the purpose of sexual gratification:
 - forcibly and/or against that person's will (non-consensually); OR
 - not forcibly or against the person's will in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

Stalking: engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (i) fear for the person’s safety or the safety of others; or (ii) suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person’s property. Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant. Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

Supportive Measures: non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the Complainant or the Respondent before or after the filing of a Formal Complaint or where no Formal Complaint has been filed. Such measures are designed to restore or preserve equal access to ICSW Programs or Activities without unreasonably burdening the other Party, including measures designed to protect the safety of all Parties or the ICSW educational environment, or deter sexual harassment. Supportive measures may include extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

Title IX Coordinator: the individual at ICSW responsible for overseeing ICSW’s compliance with Title IX, the Clery Act, and IL violence against women act (VAWA).

Title IX Prohibited Conduct: the collective term used in this Title IX Procedure to refer to the conduct described in the definitions for Title IX Sexual Harassment, Sexual Assault, Dating Violence, Domestic Violence, and Stalking.

Title IX Sexual Harassment: conduct, on the basis of sex, that satisfies one or more of the following:

- Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it denies a person equal educational access.
- An employee of ICSW conditioning the provision of an aid, benefit, or service of ICSW on an individual’s participation in unwelcome sexual conduct.

ICSW Directive: a directive issued by ICSW restricting activities of an individual in connection with an allegation or finding of violation under this Title IX Procedure.

ICSW-Identified Advisor: an attorney made available by ICSW to serve as a Party’s Hearing Support Person under a flat-fee structure, and, in the case of student Parties, to provide up to two hours of consultation services at any time after a Notice of Formal Complaint is issued.

ICSW Program or Activity: locations, events, or circumstances over which ICSW exercised substantial control over both the alleged Respondent and the context in which the Title IX Prohibited Conduct occurs, and also includes any building owned or controlled by a student organization that is officially recognized by ICSW.

Violence: the use of physical force to cause harm or injury.

Witness: a person asked to give information or a statement under this Title IX Procedure.

Written Determination Regarding Responsibility: the formal written notification issued by the Adjudicator after a Hearing that includes: (i) identification of the allegations potentially constituting Title IX Prohibited Conduct; (ii) a description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the Parties, interviews with Parties and Witnesses, site visits, methods used to gather other evidence, and Hearing held; (iii) findings of fact; (iv) conclusions about whether the alleged Title IX Prohibited Conduct occurred, applying the definitions set forth in this Title IX Procedure to the facts; (v) the rationale for the result as to each allegation; (vi) any disciplinary Sanctions imposed on the Respondent; (vii) whether Remedies or Supportive Measures will be provided to the Complainant; and (viii) information about how to file an appeal.

Appendix B: Remedies and Sanctioning Guidelines

A. Remedies

Following a determination of responsibility under this Title IX Grievance Procedure that the Respondent engaged in Title IX Prohibited Conduct directed at the Complainant, Remedies are provided to a Complainant. Remedies must be designed to restore or preserve access to ICSW's educational Program or Activity. Remedies may include disciplinary Sanctions or other actions against a Respondent. They may include the same individualized services as those offered as Supportive Measures; however, Remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent.

The Adjudicator may consult with the Title IX Coordinator or other appropriate ICSW office in crafting Remedies. The Adjudicator will decide on the Remedies as the Adjudicator deems appropriate for the particular case.

The Adjudicator should provide remedies that will remediate a hostile environment for the Complainant and/or provide safety protections for the Complainant or for ICSW community members.

1. Remedies Relating to the Respondent

Remedies relating to all Respondents could include the following restrictions:

- a. Directive not to contact (directly or indirectly) the Complainant

- b. Limiting or denying access to all or parts of campus
- c. Limiting or denying participation in campus programs or activities
- d. Limiting or denying the opportunity to hold leadership positions

Additionally, for student Respondents, remedies could include the following restrictions:

- e. Limiting or denying housing on campus or part of campus (e.g., not permitting Respondent to live near the Complainant)
- f. Requiring that the Respondent not enroll in a course that the Complainant is enrolled in or teaching
- g. Limiting or prohibiting attendance at campus parties or social events

Additionally, for faculty or teaching Respondents, remedies could include the following restrictions:

- h. Limiting or denying certain advising activities
- i. Limiting or denying certain teaching activities
- j. Limiting access to students in private spaces

Remedies for all Respondents could include the affirmative requirement for personalized education or coaching.

2. Additional Remedies for the Complainant

Additional Remedies for the Complainant will be directed by the decision-maker and/or Title IX Coordinator. Unless one of these Remedies affects the Respondent, these should remain confidential and should only be included in the Written Determination Regarding Responsibility for the Complainant.

- a. Academic or workplace accommodations
- b. Safety accommodations
- c. Other reasonable and appropriate accommodations

3. Timeframe for Remedies

The Adjudicator should indicate a timeframe for the Remedies (noting that it might be appropriate for some Remedies to have different timeframes; e.g., no leadership position for two years and no housing for three years.) Restrictions should be put in place for a certain amount of time, to achieve the appropriate remedy. Generally, the remedy may be achieved in a number of months up to five years.

4. Implementation

The Title IX Coordinator is responsible for effective implementation of any Remedies under this Title IX Grievance Procedure. Remedies may be modified by the Title IX Coordinator as circumstances change over the course of a Complainant's or Respondent's student or work career

at ICSW. The request for reconsideration may be submitted to the Title IX Coordinator, and the basis for such reconsideration will be limited to whether, given the changed circumstances, the Remedies are ones that could have been issued by reasonable persons. Upon request by a Party to reconsider a remedy, which if granted would impact the other Party, the Title IX Coordinator will provide notice and an opportunity to respond to the other Party. The Title IX Coordinator's decision on reconsideration will be provided in writing and maintains jurisdiction over the Remedies as the Parties move through ICSW.

B. Sanctions

Every violation of Student, faculty and staff handbooks is a serious matter and requires an appropriate Sanction issued after individualized review. A violation of Student, faculty and staff handbooks could lead to termination/separation from ICSW for faculty, staff, as well as expulsion for students. The Adjudicator must impose Sanctions that reflect the seriousness of the incident and the harm caused to the Complainant and, as relevant, the ICSW community.

ICSW offers the following guidance for disciplinary Sanctions for all policy violations under Student, faculty and staff handbooks. The Adjudicator may consult with the Title IX Coordinator or other appropriate ICSW office in crafting Sanctions. The Adjudicator will decide on the Sanctions as the Adjudicator deems appropriate for the particular case.

1. Most Serious Offenses, Termination/Expulsion

While any violation under the student, faculty or staff handbook is of concern and while any violation may lead to separation/termination or expulsion depending on the individual circumstances of the case, ICSW considers the following offenses to be particularly egregious and likely warrant separation/termination or expulsion unless there are significant mitigating circumstances that overcome the presumption:

- a.** Rape, Sodomy, Sexual Assault with an Object including an aggravating factor
- b.** Domestic or Dating Violence with a serious injury
- c.** Any violation including two or more aggravating factors

2. Aggravating Factors

While any violation is of concern, ICSW considers the following factors to be aggravating factors that warrant increased Sanctions:

- a.** The act is accomplished by Force, Violence, Duress, or Menace
- b.** Inducing Incapacitation through involuntary ingestion or knowingly taking advantage of an Incapacitated person
- c.** Past violations of ICSW policy by the Respondent, especially relating to Sexual Harassment and Prohibited Sexual Conduct as defined in student, faculty and staff handbooks (or prior policies)
 - i.** Decision-makers may consider past disciplinary outcomes for similar

matters but are not required to give any weight to past outcomes.

- d. More than one perpetrator
- e. Acts committed in the context of an initiation into membership and/or hazing
- f. Knowingly using the Respondent's power/authority within ICSW to obtain submission or to accomplish the violation

3. Mitigating Factors

- a. The Respondent did not have an intent to violate ICSW policy
- b. The Respondent has taken responsibility for their actions
- c. Other considerations that a reasonable decision-maker would rely on

4. Other Sanctions

Following a determination that termination/expulsion is not appropriate, a decision-maker may consider other Sanctions. The offenses listed above in Section B.1. are extremely serious and (in instances in which termination/expulsion is not warranted), for student and faculty Respondents separation from ICSW for some period of time is expected.

A decision-maker should consider the aggravating factors listed above in Section B.2. when imposing Sanctions. When one or more aggravating factors are present, the decision-maker should impose a Sanction that includes a reflection of the seriousness of the aggravating factor(s).

a. For Students

Aside from expulsion, other Sanctions could include the following:

- i. Suspension from ICSW for a period of between one – nine semesters (that is, up to three academic years).
- ii. Delay in the conferral of degree for a period of between one – nine (that is, up to three academic years) – this Sanction is only available for students in their final quarter at ICSW.
- iii. Probation with a Suspended Suspension period of one or two semesters – time away from ICSW is not immediately imposed but should the Respondent face any other disciplinary matter at ICSW that decision-making body would be informed in the Sanction phase that the student was on probation, would consider the probation as an aggravating factor in setting discipline, and would minimally impose the suspended suspension period as an actual suspension.
- iv. Probation – Should the Respondent face any other disciplinary matter at ICSW that decision-making body would be informed in the Sanction phase that the student was on probation and would consider the probation as an aggravating factor in imposing discipline.
- v. Required personalized education or coaching.

vi. Community service hours.

b. For Faculty

Beyond termination, other Sanctions include the following:

- i.** Suspension for a period of time.
- ii.** Denying a pay raise for a period of time.
- iii.** Denying the opportunity to hold committee or community roles, such as serving as a Resident Fellow or Department Chair.
- iv.** Denying the opportunity for promotion.
- v.** Letter in personnel file.
- vi.** Public or private censure.
- vii.** Required personalized education or coaching.

c. For Staff

Beyond termination, other Sanctions include the following:

- i.** Suspension for a period of time.
- ii.** Denying a pay raise for a period of time.
- iii.** Denying the opportunity to hold committee or community roles, such as serving as a Resident Fellow or Department Chair.
- iv.** Denying the opportunity for promotion.
- v.** Written warning in personnel file.
- vi.** Required personalized education or coaching.

Appendix C: Timeframes for Title IX Procedure

ICSW will strive to complete this Title IX Procedure in a prompt manner. Generally, ICSW will seek to complete a Hearing within 120 calendar days from the filing of a Formal Complaint. This 120-day guideline is based on the specific timeframes for each phase of the Title IX Procedure as set forth below, and accounts for unavoidable and reasonable delays, such as ICSW breaks (when Parties and/or Witnesses may be unavailable) and extensions to the Parties granted for good cause. In addition, the Title IX regulations require that the Parties have two 10-day periods to review the evidence and respond to the Investigative Report, which necessarily extend the total time for resolution of a matter under this Title IX Procedure. In any event, ICSW will not compromise a thorough and fair process in order to meet the 120-day timeframe from the filing of a Formal Complaint to a Hearing outcome. If any Party chooses to appeal the Hearing outcome, the timeframes below provide for an additional 30-day period to submit, respond to, and decide the appeal. If any deadline under the guidelines set forth below falls on a weekend or holiday, there will be an automatic extension to the next business day.

After receiving a Written Notice of Formal Complaint, both the Complainant and the Respondent will be asked to identify any academic or other significant conflicts that would affect the timing of the

Investigation and potential. The Hearing Coordinator will consider this input in finalizing any Hearing Schedule.

If the Parties elect to engage in an Informal Resolution, the timeframes below will be suspended during the pendency of that process.

Extensions are only granted for good cause. A request for an extension must be made, in writing and with reasons provided, to the Hearing Coordinator. The Hearing Coordinator will endeavor to respond to an extension request promptly, in writing, ideally within 24 hours.

The timeframe guidelines for each phase of the Title IX Procedure after the filing of a Formal Complaint are as follows:

1. The Title IX Coordinator will endeavor to determine whether to proceed with a Written Notice of Formal Complaint within **5 calendar days** of receiving a Formal Complaint signed by the Complainant. In the situation where the Complainant declines to file a Formal Complaint, and the Title IX Coordinator determines that proceeding over the wishes of the Complainant is not clearly unreasonable in light of the known circumstances, the Title IX Coordinator will sign the Formal Complaint and issue the Written Notice of Formal Complaint within **5 calendar days** of that determination.
2. The Investigator will endeavor to complete the Investigation within **1 calendar month** of the date the Written Notice of Formal Complaint is sent to the Parties. Both Parties have the opportunity to present evidence and identify Witnesses during this timeframe. This timeframe may be extended in complex matters or matters with multiple Witnesses to give the Investigator enough time to gather relevant evidence and schedule Witness interviews.
3. As required by the Title IX regulations, after the Investigator has concluded the collection of evidence, the Parties will be given **10 calendar days** to review the evidence and provide a response.
4. After the Investigator has received the Parties' response to the evidence, the Title IX Coordinator will endeavor to send the Investigative Report to the Parties within **14 calendar days**. This timeframe may be extended, however, if the Parties' responses identify new sources of evidence that require additional Investigation.
5. As required by the Title IX regulations, the Parties will be given **10 calendar days** to review and provide a response to the Investigative Report.
6. The Title IX Coordinator will endeavor to issue either a Notice of Dismissal or Notice of Charge within **10 calendar days** of receipt of the Parties' responses to the Investigative Report.
7. Within **7 calendar days** of the issuance of a Notice of Charge, the Hearing Coordinator will:
 - a. Make the Initial Hearing File available to the Parties;

- b. Identify the Adjudicator to the Parties and give the Parties the opportunity to object to the Adjudicator on the basis of a conflict of interest, as set forth in Section IV.J.4. If either Party objects to the Adjudicator, the timeframe for the Hearing Schedule will be delayed until the alleged conflict of interest can be reviewed and a new Adjudicator identified and agreed to, if necessary; and
- c. Reach out to all Parties, Witnesses, and the Adjudicator to coordinate the Hearing Schedule. The scheduling of the Hearing will be determined by the availability of the Parties, Witnesses, the Parties' Hearing Support Persons, and the Adjudicator.

8. Within **5 calendar days** of the creation of the Hearing File, the Parties may submit a response to the Hearing File (as set forth in Section IV.I.3.) and any objections to the Hearing file (as set forth in Section IV.1.2.). Any objections to the Hearing File will be resolved by the Adjudicator at the outset of the Hearing.

9. At the conclusion of the Hearing, the Adjudicator may ask the Parties to submit additional materials or Sanctions statements. The Adjudicator will endeavor to issue the Written Determination Regarding Responsibility within **10 calendar days** of receipt of those materials by the Parties or within **10 calendar days** of the conclusion of the Hearing if no additional materials are requested. Any Party wishing to appeal the Written Determination Regarding Responsibility must do so within **10 calendar days** of the issuance of the Written Determination Regarding Responsibility. The other Party will have **10 calendar days** to respond to an appeal. The Appeal Officer will endeavor to issue an Appeal Outcome within **10 calendar days** after any response to an appeal is received.

Drug-Free Campus

You may not manufacture, distribute, dispense, possess, use, or be under the influence of alcohol or illegal drugs in workplace. This prohibition includes prescription drugs used improperly (e.g., those not prescribed for the user). Any violation of this policy may be grounds for discipline up to and including dismissal.

Student Records - Family Educational Rights and Privacy Act (FERPA)

The following guidance provides eligible students with general information about the Family Educational Rights and Privacy Act (FERPA). This document is a compilation and update of various letters and guidance documents previously issued that respond to a variety of questions about FERPA. While this guidance reflects our best and most current interpretation of applicable FERPA requirements, it does not supersede the statute or regulations.

We will attempt to update this document from time to time in response to questions and concerns. FERPA is a Federal law that is administered by the Family Policy Compliance Office (Office) in the U.S. Department of Education (Department). 20 U.S.C. § 1232g; 34 CFR Part 99. FERPA applies to all educational agencies and institutions (e.g., schools) that receive funding under any program administered by the Department. Parochial and private schools at the elementary and secondary levels generally do not receive such funding and are, therefore, not subject to FERPA. Private postsecondary schools, however, generally do receive such funding and are subject to FERPA.

Once a student reaches 18 years of age or attends a postsecondary institution, they become an "eligible student," and all rights formerly given to parents under FERPA transfer to the student. The eligible student has the right to have access to their education records, the right to seek the records amended, the right to have control over the disclosure of personally identifiable information from the records (except in certain circumstances specified in the FERPA regulations, some of which are discussed below), and the right to file a complaint with the Department. The term "education records" is defined as those records that contain information directly related to a student and which are maintained by an educational agency or institution or by a party acting for the agency or institution.

FERPA generally prohibits the improper disclosure of personally identifiable information derived from education records. Thus, information that an official obtained through personal knowledge or observation, or has heard orally from others, is not protected under FERPA. This remains applicable even if education records exist which contain that information, unless the official had an official role in a decision that generated a protected education record.

Under FERPA, a school is not generally required to maintain particular education records or education records that contain specific information. Rather, a school is required to provide certain privacy protections for those education records that it does maintain. Also, unless there is an outstanding request by an eligible student to inspect and review education records, FERPA permits the school to destroy such records without notice to the student.

Access to Education Records

Under FERPA, a school must provide an eligible student with an opportunity to inspect and review their education records within 45 days following its receipt of a request. A school is required to provide an eligible student with copies of education records, or make other arrangements, if a failure to do so would effectively prevent the student from obtaining access to the records. A case in point would be a situation in which the student does not live within commuting distance of the school.

A school is not generally required by FERPA to provide an eligible student with access to academic calendars, course syllabi, or general notices such as announcements of specific events or extra-curricular activities. That type of information is not generally directly related to an individual student and, therefore, does not meet the definition of an education record.

Under FERPA, a school is not required to provide information that is not maintained or to create education records in response to an eligible student's request. Accordingly, a school is not required to provide an eligible student with updates on their progress in a course (including grade reports) or in school unless such information already exists in the form of an education record.

Amendment of Education Records

Under FERPA, an eligible student has the right to request that inaccurate or misleading information in their education records be amended. While a school is not required to amend education records in accordance with an eligible student's request, the school is required to consider the request. If the school decides not to amend a record in accordance with an eligible student's request, the school must inform the student of their right to a hearing on the matter. If, because of the hearing, the school still decides not to amend the record, the eligible student has the right to insert a statement in the record setting forth their views. That statement must remain with the contested part of the eligible student's record for as long as the record is maintained.

However, while the FERPA amendment procedure may be used to challenge facts that are inaccurately recorded, it may not be used to challenge a grade, an opinion, or a substantive decision made by a school about an eligible student. FERPA was intended to require only that schools conform to fair recordkeeping practices and not to override the accepted standards and procedures for making academic assessments, disciplinary rulings, or placement determinations. Thus, while FERPA affords eligible students the right to seek to amend education records which contain inaccurate information, this right cannot be used to challenge a grade or an individual's opinion, or a substantive decision made by a school about a student. Additionally, if FERPA's amendment procedures are not applicable to an eligible student's request for amendment of education records, the school is not required under FERPA to hold a hearing on the matter.

Disclosure of Education Records

Under FERPA, a school may not generally disclose personally identifiable information from an eligible student's education records to a third party unless the eligible student has provided written consent. However, there are many exceptions to FERPA's prohibition against non-consensual disclosure of personally identifiable information from education records. Under these exceptions, schools are permitted to disclose personally identifiable information from education records without consent, though they are not required to do so. Following is general information regarding some of these exceptions.

One of the exceptions to the prior written consent requirement in FERPA allows "school officials," including teachers, within a school to obtain access to personally identifiable information contained in education records provided the school has determined that they have "legitimate educational interest" in the information. Although the term "school official" is not defined in the statute or regulations, this Office generally interprets the term to include parties such as: professors; instructors; administrators; health staff; counselors; attorneys; clerical staff; trustees; members of committees and disciplinary boards; and a contractor, volunteer or other party to whom the school has outsourced institutional services or functions.

A school must inform eligible students of how it defines the terms "school official" and "legitimate educational interest" in its annual notification of FERPA rights. A school official generally has a legitimate educational interest if the official needs to review an education record to fulfill their professional responsibility. Additional information about the annual notification of rights is found below in this guidance document.

Another exception permits a school to disclose personally identifiable information from an eligible student's education records, without consent, to another school in which the student seeks or intends to enroll. The sending school may make the disclosure if it has included in its annual notification of rights a statement that it forwards education records in such circumstances. Otherwise, the sending school must make a reasonable attempt to notify the student in advance of making the disclosure, unless the student has initiated the disclosure. The school must also provide an eligible student with a copy of the records that were released if requested by the student.

FERPA also permits a school to disclose personally identifiable information from education records without consent when the disclosure is about financial aid for which the student has applied or which the student has received, if the information is necessary for such purposes as to: determine the eligibility for the aid; determine the amount of the aid; determine the conditions for the aid; and/or enforce the terms and conditions of the aid. With respect to this exception, the term "financial aid" means payment of funds provided to an individual (or payment in kind of tangible or intangible property to the individual) that is conditioned on the individual's attendance at a school.

Another exception permits a school to disclose personally identifiable information from education records without consent when the disclosure is to the parents of a "dependent student" as that term is defined in Section 152 of the Internal Revenue Code. Generally, if either parent has claimed the student as a dependent on the parent's most recent year's income tax statement, the school may non-consensually disclose the eligible student's education records to both parents under this exception.

Postsecondary institutions may also disclose personally identifiable information from education records, without consent, to appropriate parties, including parents and/or emergency contacts of an eligible student, about a health or safety emergency. Under this provision, colleges and universities may notify parents when there is a health or safety emergency involving their child, even if the parents do not claim the student as a dependent.

FERPA also permits a school to disclose personally identifiable information from education records without consent when the disclosure is to the parents of a student at a postsecondary institution regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance. The school may non-consensually disclose information under this exception if the school determines that the student has committed a disciplinary violation with respect to that use or possession and the student is under 21 years of age at the time of the disclosure to the parent.

Another exception permits a school to non-consensually disclose personally identifiable information from a student's education records when such information has been appropriately designated as directory information. "Directory information" is defined as information contained in the education records of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Directory information could include information such as the student's name, address, e-mail address, telephone listing, photograph, date and place of birth, major field of study, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees and awards received, the most recent previous educational agency or institution attended, grade level or year (such as freshman or junior), and enrollment status (undergraduate or graduate; full-time or part-time).

A school may disclose directory information without consent if it has given public notice of the types of information it has designated as directory information, the eligible student's right to restrict the disclosure of such information, and the period within which an eligible student has to notify the school that they do not want any or all of those types of information designated as directory information. Also, FERPA does not require a school to notify eligible students individually of the types of information it has designated as directory information. Rather, the school may provide this notice by any means likely to inform eligible students of the types of information it has designated as directory information.

There are several other exceptions to FERPA's prohibition against non-consensual disclosure of personally identifiable information from education records, some of which are briefly mentioned below. Under certain conditions (specified in the FERPA regulations), a school may non-consensually disclose personally identifiable information from education records:

- to authorized representatives of the Comptroller General of the United States, the Attorney General of the United States, the U.S. Secretary of Education, and State and local educational

authorities for audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs;

- to organizations conducting studies for or on behalf of the school making the disclosure for the purposes of administering predictive tests, administering student aid programs, or improving instruction;
- to comply with a judicial order or a lawfully issued subpoena;
- to the victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense concerning the final results of a disciplinary hearing with respect to the alleged crime; and
- to any third party the final results of a disciplinary proceeding related to a crime of violence or non-forcible sex offense if the student who is the alleged perpetrator is found to have violated the school's rules or policies. The disclosure of the final results only includes: the name of the alleged perpetrator, the violation committed, and any sanction imposed against the alleged perpetrator. The disclosure must not include the name of any other student, including a victim or witness, without the written consent of that other student.

As stated above, conditions specified in the FERPA regulations at 34 CFR § 99. 31 have to be met before a school may non-consensually disclose personally identifiable information from education records in connection with any of the exceptions mentioned above.

Annual Notification of Rights

Under FERPA, a school must annually notify eligible students in attendance of their rights under FERPA. The annual notification must include information regarding an eligible student's right to inspect and review their education records, the right to seek to amend the records, the right to consent to disclosure of personally identifiable information from the records (except in certain circumstances), and the right to file a complaint with the Office regarding an alleged failure by a school to comply with FERPA. It must also inform eligible students of the school's definitions of the terms "school official" and "legitimate educational interest."

FERPA does not require a school to notify eligible students individually of their rights under FERPA. Rather, the school may provide the notice by any means likely to inform eligible students of their rights. Thus, the annual notification may be published by various means, including any of the following: in a schedule of classes; in a student handbook; in a calendar of school events; on the school's website (though this should not be the exclusive means of notification); in the student newspaper; and/or posted in a central location at the school or various locations throughout the school. Additionally, some schools include their directory information notice as part of the annual notice of rights under FERPA.

Law Enforcement Units and Law Enforcement Unit Records A "law enforcement unit" means any individual, office, department, division or other component of a school, such as a unit of commissioned police officers or non-commissioned security guards, that is officially authorized or designated by the school to: enforce any local, State, or Federal law, or refer to appropriate authorities a matter for enforcement of any law against any individual or organization; or to maintain the physical security and safety of the school. The law enforcement unit does not lose its status as a law enforcement unit if it also performs other, non-law enforcement functions for the school, including investigation of incidents or conduct that constitutes or leads to a disciplinary proceeding against a student.

"Law enforcement unit records" (i.e., records created by the law enforcement unit, created for a law enforcement purpose, and maintained by the law enforcement unit) are not "education records" subject to the privacy protections of FERPA. As such, the law enforcement unit may refuse to provide an eligible

student with an opportunity to inspect and review law enforcement unit records, and it may disclose law enforcement unit records to third parties without the eligible student's prior written consent. However, education records, or personally identifiable information from education records, which the school shares with the law enforcement unit do not lose their protected status as education records because they are shared with the law enforcement unit.

Complaints of Alleged Failures to Comply with FERPA

FERPA vests the rights it affords in the eligible student. The statute does not provide for these rights to be vested in a third party who has not suffered an alleged violation of their rights under FERPA. Thus, we require that a student have "standing," i.e., have suffered an alleged violation of his or her rights under FERPA, to file a complaint. The Office may investigate those timely complaints that contain specific allegations of fact giving reasonable cause to believe that a school has violated FERPA. A timely complaint is defined as one that is submitted to the Office within 180 days of the date that the complainant knew or reasonably should have known of the alleged violation of FERPA. Complaints that do not meet FERPA's threshold requirement for timeliness are not investigated.

If we receive a timely complaint that contains a specific allegation of fact giving reasonable cause to believe that a school has violated FERPA, we may initiate an administrative investigation into the allegation in accordance with procedures outlined in the FERPA regulations. If a determination is made that a school violated FERPA, the school and the complainant are so advised, and the school is informed of the steps it must take to come into compliance with the law. The investigation is closed when voluntary compliance is achieved. Please note that the eligible student should state their allegations as clearly and specifically as possible. To aid us in efficiently processing allegations, we ask that an eligible student only include supporting documentation that is relevant to the allegations provided. Otherwise, we may return the documentation and request clarification. This Office does not have the resources to review voluminous documents and materials to determine whether an allegation of a violation of FERPA is included. An eligible student may obtain a complaint form by calling the Department of Education at (202) 260-3887. For administrative and privacy reasons, we do not discuss individual allegations and cases via email. Please mail completed complaint forms to the Office (address below) for review and any appropriate action.

Complaint Regarding Access

If an eligible student believes that a school has failed to comply with their request for access to education records, the student may complete a FERPA complaint form and should include the following specific information: the date of the request for access to the education records; the name of the school official to whom the request was made (a dated copy of any written request to the school should be provided, if possible); the response of the school official, if any; and the specific nature of the information requested.

Complaint Regarding Amendment

If an eligible student believes that a school has failed to comply with their request for amendment of inaccurate information in education records or failed to offer the student an opportunity for a hearing on the matter, the student may complete a FERPA complaint form and should include the following specific information: the date of the request for amendment of the education records; the name of the school official to whom the request was made (a dated copy of any written request to the school should be provided, if possible); the response of the school official, if any; the specific nature of the inaccurate information for which amendment was requested; and evidence provided to the school to support the assertion that such information is inaccurate.

Complaint Regarding Disclosure

If an eligible student believes that a school has improperly disclosed personally identifiable information from their education records to a third party, the student may complete a FERPA complaint form and should include the following specific information: the date or approximate date the alleged disclosure occurred or the date the student learned of the disclosure; the name of the school official who made the disclosure, if that is known; the third party to whom the disclosure was made; and the specific nature of the education records disclosed. This guidance document is designed to provide eligible students with some general information regarding FERPA and their rights, and to address some of the basic questions most frequently asked by eligible students. You can review the FERPA regulations, frequently asked questions, significant opinions of the Office, and other information regarding FERPA at our Website as follows:

www.ed.gov/policy/gen/guid/fpco/index.html

If, after reading this guidance document, you have questions regarding FERPA which are not addressed here, you may write to the Office at the following address:

Family Policy Compliance Office
U.S. Department of Education 400
Maryland Avenue, SW

Washington, DC 20202-8520

Whistleblower Policy

If any employee, faculty member or student reasonably believes that some policy, practice or activity of ICSW is in violation of law, public policy or accreditation standards, that person should file a written complaint with the President, Academic Dean or the Board Chair. That person is protected from retaliation for bringing such an alleged violation to the attention of the President, Academic Dean or Board Chair. ICSW will also not retaliate against an employee, faculty member or student who in good faith discloses or threatens to disclose alleged violations of law, public policy or accreditation standards to a public body or an accrediting organization.

Section 3: Master's Program Requirements

MA Program Components Timeline (Full-Time)

Year 1 Fall Term:	Clinical Consultation 1
	Field Placement 1
Year 2 Spring Term:	Clinical Consultation 2
	Field Placement 1, continued
Year 2 Fall Term:	Clinical Consultation 3
	Field Placement 2
Year 2 Spring Term:	Clinical Consultation 4
	Field Placement 2, continued
	Case Presentation
	Comprehensive Exam

Case Presentation

During their final semester of classes, students will present a clinical case to a Case Presentation Committee (consisting of 3 faculty members). Students will complete a detailed case report on a client. The report will include: identifying information and reasons for referral, background/historical information, a clinical diagnostic formulation, discussion of the treatment plan and process, and discussion of what was learned from the treatment. Included in the case report will be a process recording of all or part of a session. The student will be evaluated on the integration of clinical conceptualization and techniques along with the quality of the written report, process recording, and verbal presentation. The case presentation is 1 credit hour and graded through formal evaluation forms and is PASS/FAIL.

M.A. Clinical Practicum

Each Master's degree student will be assigned a member of ICSW's Faculty to be that student's Clinical Consultant. The student will meet every other week throughout the school year with his or her consultant (*16 total meetings required, 8 per semester*); and the purpose of this ongoing consultation is to support the student's ability to integrate the experiences from the Practicum and Advanced Practicum with classroom learning. These consultations will be tracked, so regular attendance is important; when possible, missed sessions should be re-scheduled. Consultations do not include required write-ups; however, the consultation should be treated as a pass/fail course. Clinical Consultation with a student's Faculty consultant is considered a class (CCP 1-4) that is taken every semester that the student is in the MA program. The requirements for this class is to meet at least *8 times a semester (16 times a year)* with the faculty consultant. Process recordings (at least 4 a semester) will be a part of this course if a student is not doing process recordings at their internship site. An evaluation must be completed by the consultant at the end of each semester and the consultant submits a PASS/FAIL grade.

Comprehensive Examination

During a student's final semester, the student will complete a Comprehensive Exam. This exam will consist of a long-answer essay question(s) associated with the coursework component of their training specifically related to both a comprehensive understanding of and the relevance of psychodynamic theory. Students will have 7-10 days to complete the comprehensive exam.

The comprehensive exam will be reviewed by the committee with a detailed rubric. Members of the committee are appointed by the Academic Dean. Students will be notified in writing of either a Pass or Fail designation by the Committee. A student who fails the comprehensive examination may elect to retake the examination a minimum within three weeks after the notification date. A student may attempt the Comprehensive Examination three times. The comprehensive exam is a requirement for graduation but does not receive credit hours.

Field Placement

Field Placement Overall Objectives

Clinical field education is considered a vital component of the MA in Clinical Counseling and Psychotherapy curriculum. ICSW has adopted a concurrent model of field instruction, meaning students take courses and complete the practicum placement at the same time. In addition, while the State of Illinois requires just one Field Placement (Practicum placement experience) during a counseling master's degree program, ICSW requires an additional Practicum placement, to further develop and reinforced students' clinical training. The practicum placement is designed to help students acquire, further develop, and integrate knowledge and practice skills in counseling and psychotherapy. Students will have the opportunity to further enhance and integrate their learning in Field Internship Seminars which meet weekly and are taught by ICSW faculty. Master's students are expected to contribute to their learning through active, constructive participation with peers, staff, and faculty in the field and in the classroom.

Clinical supervision requirements

ICSW requests that training settings provide one hour per week of clinically focused supervision. In addition to supervision students receive at their placements, each student is assigned a member of ICSW's Faculty to serve as a clinical consultant to help each student integrate coursework and practicum learning in a way tailored to each student's learning needs; students will meet with their consultants every other week. The student is required to meet with the consultant 8 times during the semester, 16 times during an academic year. Finally, students will attend a weekly practicum placement seminar at ICSW.

Credentials of onsite clinical supervisors

At their practicum/field internship sites, MA students must be supervised by persons holding one of the following licenses: LCSW and LCPC or a staff member who has a PsyD.

Employment and Field Placement

Students may be approved to complete a field placement at their place of enrollment as long as the responsibilities for their placement are separate from their responsibilities as an employee.

Expectations for Students: Holidays and Time off

Students are expected to attend their practicum placement during the regular operating hours of the agency. All time off must be approved by the field instructor. Lunch and travel to and from the agency is not counted towards your hours.

Students needing days away from their practicum placement for illness or death in the family should immediately notify their Field Instructor and the Associate Director of Academic Affairs. Students are responsible for making up any missed hours.

Liability/Malpractice Insurance

All students registered for practicum placement are covered by ICSW's malpractice insurance.

Role & Responsibilities of Field Instructors

Field instructors are crucial to student learning in the field; each instructor assumes a major role as onsite instructor and supervisor to the student learner. ICSW, in supporting this important function, offers field instructors active support and continuing education training.

The field instructor is responsible for helping students integrate theory and practice, providing support, monitoring student progress, orienting the student to agency personnel, procedures, documentation requirements, providing constructive feedback, consulting with the ICSW Associate Director of Academic Affairs and/or the Academic Dean and completing and submitting Learning Agreements and Evaluations.

Learning Agreements & Evaluations

At the beginning of a student's internship, field instructors are responsible for completing the learning agreement. In addition, at the end of every semester, field instructors are responsible for doing evaluations of students' performance at the training site. It is requested that the field instructor and student complete both the learning agreements and evaluations collaboratively. The Learning Agreements are due with 30 days of student starting in the placement. First Field Evaluation is due at the end of the first semester.

Performance Issues

Field instructors will notify immediately the Associate Director of Academic Affairs if the student is performing below expectations.

Field Instructor Orientation

ICSW will provide field instructors with an overview of curriculum and descriptions of courses students are taking.

Process for Resolving Conflicts in the Field

At times, problems arise in professional settings that require additional attention to resolve. We ask that field instructors and ICSW master's students follow the process described below when trying to resolve areas of conflict or concern.

1. Field instructor and student should address the concern or conflict in supervision as part of the supervisory process. The student must inform the Associate Director of Academic Affairs in advance of any such meeting; ICSW's strong preference is that the Director attend the meeting.
2. If the conflict is not resolved in supervision, either party, the field instructor or student can request a meeting with the Associate Director of Academic Affairs. The Associate Director of Academic Affairs will attempt to clarify problem areas, explore solutions, and work toward a mutually-agreed upon plan toward resolution.
3. If the conflict is not resolved with the Associate Director of Academic Affairs, the field instructor or student may request a meeting with ICSW's Academic Dean.
4. At no point are students permitted to decide autonomously to leave a placement or to stop

attendance at a placement: doing so violates an agreement that ICSW has made with the training site and may trigger a Student Progression Committee meeting. All decisions about altering or terminating a placement prematurely must be made in conjunction with the Associate Director of Academic Affairs, the practicum site, and ICSW administration.

5. If a student receives a failing grade for a field work evaluation this could result in a Student Progression Committee meeting and possible dismissal from the program. In these cases, the Associate Director of Academic Affairs and/or the Academic Dean will be in touch with the field instructor for a remediation plan and will be in consultation with the other ICSW Administrative staff to discuss options in terms of plans for the student.

Roles & Responsibilities of Students

Clinical experiences in the field are an essential component of master's students training, providing opportunities for both professional and clinical learning and development. At their practicum placements, students have opportunities to begin applying classroom learning to clinical experiences. Therefore, practicum placement experiences must be top priorities for ICSW students.

Disclosure of Student Status

Students must disclose their student status to clients as a matter of following ethical practice guidelines. It is advisable for students to seek their field instructor's guidelines on introducing this to clients, including:

- how to introduce themselves (trainee, graduate student, counseling student,)
- how to anticipate, think about and respond to questions that clients might raise

Training Requirements

First-Year training sites for the Practicum will provide a two day a week training experience at an agency or community center setting. The First-Year Practicum/Internship experience may be clinical, or may be a mix of administrative, case management and clinical support functions that undergird the provision of clinical services. **350 hours are required for the first-year internship/practicum.** Generally, students will be assigned to their First-Year Practicum placements; however, it's likely that they also will be required to interview for these placements.

Second-Year training sites for the Advanced Practicum/Internship will provide a three-days-a-week training experience at an agency or community center setting that will be primarily clinical. **700 hours are required for the second-year internship/practicum.** Direct client contact should be more than 50% of the student's total hours each week, leaving the remaining hours for supervision and paperwork.

Dress Students are expected to present themselves in a professional manner, including dress, and to follow the practicum placement's/agency's dress code.

Technology and Electronic Communications (*Cell phones, Texting, Email, Laptops, Tablets*)

Student must adhere to their practicum placement's policies regarding cell phone use, emailing clients, texting, and personal laptop or tablet use, or playing personal music, such as through a phone. ICSW students are expected to keep their personal cell phone use to a minimum while at their practicum placements.

To protect clients' confidentiality and maintain professional boundaries, students must strictly follow agency policies regarding use of electronic communication devices and systems, including personal laptops or tablets, flash drive, and email. Students must avoid, at all costs, transferring physically or transmitting electronically any client information, in any form, out of a practicum setting. For example, students may not take home any part of a paper file, nor may a student email client data, nor store client

data on anything like a thumb-drive for any purpose, including schoolwork.

An important component of students' clinical learning involves writing case assessments and case studies and presenting clients' cases for clinical discussion. Students are expected to follow their practicum placement's policies on use of client material for learning. The general rule is that all client information must be carefully disguised so no one can readily recognize the individual.

Facebook and Other Social Internet Networks

Students must adhere to agency confidentiality policies and professional ethics regarding the use of technology. Providing information on Facebook or other internet social networking systems about practicum placement agencies, personnel, colleagues, or clients is a serious breach of confidentiality and may constitute a Student Progression issue at ICSW. As developing new professionals, students are advised to be extremely careful about their online profiles and postings, and to remove from any publicly available profile any personal material that is not consistent with developing a new professional identity as a psychotherapist. It is advisable for students to do online searches of themselves periodically to see what information about them is publicly available – for example, in the case of students' being looked for by a client or potential client – and to take any necessary steps.

Roles & Responsibilities of the Associate Director of Academic Affairs and ICSW

The Associate Director of Academic Affairs holds multiple responsibilities to both students and practicum placements. The Associate Director of Academic Affairs is the first point of contact for questions and concerns about clinical practicum placements from both students and field instructors and questions about the ICSW curriculum from field instructors. The Associate Director of Academic Affairs also is the point of contact for problems or conflicts between students and field instructors.

Academic Dean Visits

The Academic Dean will visit the training site at least once each semester and more frequently if needed.

Field Placement Seminar

Students will attend a weekly practicum placement seminar taught by ICSW faculty. The practicum placement seminar serves a supportive, educational role in helping students integrate their coursework and field experiences, develop self-awareness and insight into clinical work.

Section 4: PhD Program Requirements

PhD Program Components Timeline (Full-Time)

Year 1:	Clinical Practicum 1 (with advisor/consultant 1)
Year 2:	Clinical Practicum 2 (with advisor/consultant 1) Clinical Practicum 3 (with consultant 2)
End of year 2/beginning of year 3:	Case Presentation
Year 3:	Clinical Practicum 4 (with consultant 2) Clinical Practicum 5 (with consultant 3) after passing presentation
End of year 3/beginning of year 4:	Qualifying Theory Exam (QTE) Advanced Student Status (after passing QTE)

PhD Case Presentation

Summary

The purpose of the Case Presentation is to evaluate the student's learning progress in clinical evaluation and treatment and ability to engage in an open discussion with a panel of faculty members. In the Case Presentation, students discuss how their diagnostic and treatment thinking and practice have changed as they have progressed through their clinical education at ICSW. A major part of the Case Presentation is the written and oral discussion of a case, including diagnostic and treatment material, as well as a sample of treatment process. The goal of the presentation is to help students and faculty determine how much the student has learned and what remains to be learned to meet ICSW's clinical practice learning outcomes, which can be found in the Academic Catalog. For a full description of the philosophy of the Case Presentation processes, see the PhD Case Presentation Outline (available online). A premium is placed on the ability and willingness of the student to engage in an open, non-defensive discussion with the case presentation panel. Qualities of self-awareness, forthrightness, clarity and complexity of thought, and ability to link psychodynamic concepts with clinical work are stressed.

Policy

The Case Presentation takes place during the third year of clinical consultation for students matriculating in or after 2014. The case presented must involve a client used to meet Clinical Practicum requirements. The presentation may not take place without a review of the student's file and account to ensure all requirements are met.

The Case Presentation is made to a panel of faculty, including:

- A chair (either the Clinical Practicum Chair or a designate)
- Two members of the full Faculty
- The student's consultant

The role of the consultant in the Case Presentation is to serve as an advisor to the panel. Two of the three panel members must agree on a recommendation. Other students and faculty may be present if the student wishes to invite them. The chair is responsible for arranging a mutually acceptable time for the

presentation and for posting this information for ICSW faculty and student body. The panel reviews the student's current Treatment Consultations and may make suggestions regarding the third Treatment Consultation.

Procedures for Preparing and Conducting a Case Presentation

The following steps are required prior to the Case Presentation:

- The student should utilize the consultant and, if so desired, other faculty members, for help in preparing for the presentation. The student and his/her case consultant concur that a case is appropriate to be used for the Case Presentation and that the write up and accompanying process recording (see Case Presentation Outline in the appendix) are in final draft form and approved by the consultant. The write-up should be no longer than 20 pages long, should conform to the Case Presentation Outline and should be accompanied by an example or examples from process recordings that the student and consultant believe illustrate important aspects of the case.
- The student formally requests a hearing by forwarding the write-up to the Clinical Practicum Chair. **The case must be submitted to the Clinical Practicum Chair for presentation within one year of completion of the consultation.**
 - After the Clinical Practicum Chair approves the write-up and progress notes, they contact the Registrar & Director of Academic Services and the VP, Finance and Operation, to request a file review on behalf the student.
 - Once the file reviews have been completed and the student is approved by administration to present, the Clinical Practicum Chair asks the student/consultant to provide several dates/times as potential times to present.
 - The Clinical Practicum Chair puts out a call to faculty to convene a panel.
 - When a panel is identified, the Clinical Practicum Chair assigns a panel chair (when possible, the Clinical Practicum Chair acts as panel chair).
 - The Clinical Practicum Chair forwards the write-up, progress recordings and a link to the evaluation form that the panel fills out at the end of the presentation to the panel.
 - If the presentation is taking place in person, the Clinical Practicum Chair arranges for a classroom and communicates this to the panel and the student.
 - If the presentation is taking place in a hybrid or Zoom format, the panel chair creates and sends out the Zoom invitation.

Expectations

Each student's Case Presentation Panel is staffed by different faculty members; therefore, no two Panels will function in the same way. However, there is uniformity outlined here.

Each Case Presentation will last for an hour and a half to two hours and should include some formal presentation by the student with ample time left for free discussion.

It is the Panel chair's responsibility to structure the meeting, and to provide links to the evaluation forms to the Panel members (the student's consultant does not receive one.)

Process Recording

Students are required to include a process recording of either a single session or two parts of successive sessions in the write up of the case. The write up should be written in consultation with the clinical instruction on the case. The process recording should demonstrate a significant piece of work with the client.

Process Presentation

Students are expected to demonstrate clinical competence through the presentation of clinical process with the selected case and to participate in a discussion of that treatment process, including a discussion of the learning issues mobilized for the student in his/her work with the case.

Case Material

The Case Presentation is the student's opportunity to report and convey his or her understanding of how his/her clinical learning has progressed in the program and his/her understanding of a case, treatment process, and ability to work with and discuss clinical material. Flexibility is allowed in how these components are conveyed. However, with respect to case material, the following must be included:

- identifying data
- presenting complaint
- relevant history
- treatment process
- psychodynamic formulation of the treatment process
- overview of the development of the treatment
- a summary of major clinical issues and manifestations of transference and counter-transference

The student should work closely with the consultant in preparing the documents for the presentation. Thought should be given to the unique characteristics of the case to be presented and how the student can best convey his or her evolving understanding of the client and the treatment process. Following the presentation, the panel discusses the presentation in dialogue with the student.

At the time of the presentation, the panel may review the student's treatment cases regarding their representation of a broad diagnostic spectrum, and to recommend specific directions to the student for subsequent cases when indicated. The Clinical Practicum Chair may be consulted regarding any recommendations.

Following the presentation, the student is excused from the proceedings while the faculty panel, along with the student's clinical instructor, discusses and evaluates the presentation. Panel members submit written comments and their recommendation on the student's readiness to progress in the Practicum. The panel's recommendation must represent a majority of the panel members in attendance. The student's consultant does not vote. The consultant's role is primarily to help the panel in its discussion of the student's clinical work and clinical thinking. The panel's findings are shared with the student following its discussion.

Recommendations may include:

- Approval of the student's progression in the Clinical Practicum case without conditions
- Approval of the student's progression with conditions
- Deferral of the student's progression with specific requirements for remedial work to be completed prior to returning to the committee for another case presentation. The remedial work may include one or more of the followings:
 - A special focus in the next case
 - Assignment of an extra case requirement
 - An independent study in the area needing remediation
 - Consultation with a faculty member in a special area of expertise
 - Attention to problems of countertransference (possibly including a suggestion that the student seek personal treatment)
 - Other appropriate recommendations

- Failure of the student's presentation and referral to the Progression Committee

The decision and recommendations are provided on the evaluation form and placed in the student's record. If the recommendations include specific remediation, the chair of the panel may, in consultation with the student's advisor, appoint an appropriate faculty member to work with the student.

If the student is required to make a second Case Presentation, the same procedures apply as in the first presentation. If the student fails to obtain approval for progression following a second presentation, the matter will be referred to the Progression Committee for a review and further action.

Standards for Case Presentation

- The Panel will examine the development of the student's capacity to function professionally with a client through the effective and creative use of a therapeutically informed and aware self in relationship with the client. This capacity is the educationally expected outcome of the clinical instruction provided to the student within the Clinical Practicum.
- The Panel will examine the student's academic capacity to conceptualize, write about, and discuss the therapeutic process as well as concepts related to development, psychopathology and technique that informed the treatment process.
- Students are free to present their case from whatever perspectives, ideas and models which are clinically useful to them but conceptualizations presented throughout their training within the curriculum will be of interest. The Panel aims to revisit the clinical process to better understand the student's comprehension of the client and the impact of the client on the student's professional self-experience. The Panel also aims to understand the critical thinking used by the student in selecting theory and technique chosen to treat the client. Though it is not expected that students will know the answer to every question, it is expected that the student will demonstrate the capacity to enter reflective consideration and discussion of the points raised.

Case Presentation Evaluation

The following criteria guide the panel in their evaluation of the Case Presentation:

Quality of Written Report

Does the report convey a picture of the client, his/her relevant history and core dynamics, a picture of the client and therapist at work in therapy, and a brief description (to orient the readers) to the clinical theory or theories selected by the student? Does the report meet ICSW writing and style standards?

Quality of Clinical Thinking

Does the student demonstrate an expectable ability to use psychodynamic concepts to clarify his/her thinking about clinical work?

Quality of Discussion with Panel During the Case Presentation

Can the student's verbal presentation, in conjunction with the write-up and process notes, lead to a meaningful discussion with the panel?

Can the student respond openly and thoughtfully to the panel's questions and explore the issues raised by the panel?

Use of Consultation

Has the student established a productive learning alliance with the consultant?

Ph.D. Clinical Practicum

Administrative Oversight: The Chair of the Clinical Practicum shall oversee the Clinical Practicum for all students.

The Clinical Practicum, along with classroom learning, is intended to enhance students' competence in thinking about and doing psychodynamic work. The Practicum provides an experience-near learning context which allows concepts and ideas learned in the classroom setting to come alive, with the help of faculty consultants. It is important that students' learning is cross-fertilized between the Practicum and the classroom. Students are therefore encouraged to raise questions with their clinical consultants about ideas learned in the classroom, and vice-versa. To make maximum use of this process, students must keep pace in the Practicum with the suggested sequence and timing of academic coursework.

The Clinical Practicum is designed as a course, and runs September through August, with write ups, evaluations, and grades due by the end of September of each year for the prior year's consultations. A failing grade in any practicum consultation will, like a failing grade in a course, result in a referral to the student progression committee, and may eventuate in dismissal from the program.

Students should understand that all consultants work differently, and this may be reflected in different styles, expectations, and theoretical/clinical perspectives. This is a strength of the Practicum, and an opportunity for varied learning experiences. Students are required to ask for clarification about a consultant's expectations if they are at any point unclear.

Students are expected to have a caseload upon matriculation, with some cases that meet at least once weekly. If at any point during the program a student loses their caseload, or is unable to carry cases conducive to learning, the student will be referred to the progression committee, and may be placed on academic leave until the situation is remedied.

IF A CONSULTATION IS TERMINATED, THE PRACTICUM CHAIR MUST BE CONTACTED IMMEDIATELY. A terminated consultation may result in a progression review.

Progression through the Clinical Practicum: General Guidelines

Students are encouraged to complete the clinical practicum within concurrent with coursework, although the Clinical Practicum Chair may allow for some flexibility in unique situations, with their approval. All consultations must occur every other week. Meeting weekly with a consultation is not permitted. Final evaluations, write ups, and grades are due by the end of September of each year for the prior year's practicum. The progression through the Clinical Practicum will occur in the following sequence:

- **First Clinical Practicum:** Students will work with an assigned advisor to complete the 1st year of clinical practicum
- **Remaining Clinical Practicum:** Students will work with ICSW approved consultants of their choice (see Consultant Directory available online) to complete the rest of their clinical practicum
- **Clinical Meetings:** Each clinical consultation will meet from September to August every other week for a total of 22 meetings over that period. The student meets with two consultants for two years, and with one consultant for one year. Meetings will be tracked and approved by consultants.

- **Completion of Consultations:** Students are expected to complete their clinical Consultations within the coursework. If a student is unable to maintain this schedule, they must work with the Clinical Practicum Chair to create an alternate plan before the end of the course work.
- **Case Presentation:** occurs during the third year
- **Issues:** If a student experiences any issues with a consultant approving or turning in paperwork or write-ups, they must contact the Registrar & Director of Academic Services immediately. If a consultant experiences any issues with a student missing a meeting or otherwise, they must contact the Chair of the Clinical Practicum immediately.
 - All clients for cases must be seen at least weekly. Students are encouraged to see their clients for extended periods of time (e.g., more than a year). All students are encouraged to have treatment experiences in which clients are seen at a frequency of two or more sessions per week; however, there is flexibility for more varied clinical experiences. The requirement for treatment consultation is organized around the time spent with each consultant rather than the time spent with each case.
 - Frequency of consultation is every other week. Hours added to consultation more frequent than every other week may not be counted toward consultation hours.
 - Students need to work with three different consultants: one for 22 meeting consultations, and two for 44 meeting consultations. The expectation is that this total of five consultations needs to be completed during the student's three years of coursework.

Source of Cases

Since all students are expected to be in practice while in the program, clinical cases are taken from the student's own practice setting. When a student is in private practice, that student carries full administrative and clinical responsibility for the case. When a client is seen within an agency setting or clinic, that institution maintains clinical and administrative responsibility for the case while ICSW provides clinical consultation for educational purposes. It is the responsibility of the student to obtain permission from his or her agency to use cases in clinical instruction with ICSW's faculty.

All consultants are members of ICSW's full faculty. Students are assigned the initial case consultant, who is the student's advisor, prior to the start of classes. After the first Treatment Consultation assignment, students must choose consultants from the roster of approved consultation faculty (the Approved Faculty and Consultant Directory on our website) unless otherwise indicated by the Student Progression Committee or the Clinical Presentation Panel. If this occurs, the student's advisor will discuss the plan with the student.

Responsibilities of consultants in consultation

- The consultant's primary responsibility is to help the student integrate psychodynamic concepts and techniques they are learning in the classroom in the student's work with their clients.
- Consultants should focus on whether students address psychodynamic principles and concepts in their write-ups.
- Consultants are responsible for communicating with student's advisor and the Dean of Students if the student is struggling with the integration of psychodynamic principles or concepts.
- Consultants are encouraged to contact their student's prior consultants to share information relevant to the student's learning. Consultants can contact the Registrar & Director of Academic Services for a student's prior consultants.
- Consultants should share their evaluations with their students.

Responsibilities of students in consultation

It is the obligation of students, when working with consultants in the clinical practicum:

- To come to each appointment prepared.

- To maintain a regular meeting schedule.
- To act in accordance with professional ethics.
- To provide appropriate notice of the need to cancel or re-schedule consultations.
- To keep track of all hours and dates of consultation meetings, to submit on Time to Track.
- To submit all write-ups and clinical reports during the consultation period
- To be the agent of one's own learning

Requesting Changes in Practicum Requirements

All requests must be discussed first between the student and the student's advisor. When considering requests for a change from the usual requirements, the consultant will review the student's current standing in the program, learning needs, and professional development and experience up to the time of the request. Upon approval of the change, the student will contact the Clinical Practicum Chair for formal approval. The approved change should be indicated in writing and added to the student's record by the Registrar & Director of Academic Services.

The First Consultation Experience

Students are assigned their first consultant, and that first consultant serves as that student's advisor until the student selects a dissertation chair. Meetings with the advisor/first consultant should begin immediately in the first semester and should occur every other week. As part of ending the consultation, the student submits a clinical write-up. The consultant is responsible for completing a full evaluation and signing the student's write-up, plus assigning a final grade of either "Pass" or "Fail." *Even after no longer working as a consultant with a student*, the student's advisor maintains a role with the student as they progress through the program. The advisor monitors the student's learning in the Clinical Practicum by meeting with the student at least each semester to review and to discuss the student's experience. The advisor is also available as a mentor to the student to assist in the many issues that arise during the time that the student is at ICSW. This is meant as a facilitative, supportive relationship experience. Once a student's dissertation proposal is approved, the student's dissertation chair becomes the student's advisor.

Consultant Reports

Evaluations are an essential part of the consultative learning process. It is assumed that the student and consultant discuss the progress of the work in detail before the consultant writes and signs an evaluation report. The evaluations should be given to the Registrar & Director of Academic Services for filing in the student's record. Evaluation forms for treatment consultations/cases must be completed in full, with appropriate write-ups, at the end of each year of consultation. Links to all evaluation forms are available in the appendix and can be found on the ICSW website.

Students' Evaluation of Consultants

Students will be asked to evaluate their consultation learning process with each consultant. The Student Evaluation of Clinical Consultant form can be found in the Appendix of the Student Handbook. Completed forms should be given to Chair of the Clinical Practicum and the Registrar & Director of Academic Services.

Dissertation Process and Procedures

Research Practicum and Dissertation Procedures

The Research Practicum includes the following activities, designed to facilitate completion of a dissertation:

- Ongoing consultation with a dissertation committee

- A dissertation proposal hearing
- Defense of a final dissertation document

Proposal and Dissertation Process

Every student is encouraged to select and develop a dissertation topic by the third year of study. The development of the dissertation plan is a continuing process of focus and refinement until a dissertation proposal is developed to the satisfaction of the student and dissertation committee. The student is encouraged to confer with any faculty member during every phase of the process but should choose a working committee by the end of the third year. Opportunities to explore topics and strategies through seminars and other educational experiences, in ICSW and at other educational institutions, will be encouraged.

Student Responsibilities

- Documents are to be submitted in a timely manner that allows for a thorough review by the Research Practicum Chair, IRB committee, dissertation committee members and readers.
- Follow-through on all recommendations as required by the committee.
- Adhere to guidelines in the Research Manual, APA Current Edition, and IRB Manual.
- Documents are to be legible copies adhering to publication guidelines; drafts or draft quality documents are not acceptable.
- All students conducting dissertation research must become CITI certified.

The Dissertation Committee and Member Roles

The dissertation Committee is comprised of the Dissertation Chair, two committee members, and one reader. The Core Committee includes the Chair and two formal committee members. The Full Committee includes the Core Committee plus one reader. The student chooses all members of the full committee, and all members of the full committee have a vote on the committee. All Chairs and committees must be approved prior to the student's Initial Planning Meeting.

The student chooses the dissertation committee within the parameters described here:

1. Two PhD's on core committee
2. At least one designated research faculty (see below), who can serve as Chair
3. At least one member, the Methodologist, who can guide and help implement a credible and established research methodology. The Methodologist can, and is encouraged to be, the Chair.
4. One reader, who offers a "fresh pair of eyes" on the document. Readers are not part of the ongoing consultations on the student's work but enter the process to review the final proposal draft and final dissertation draft prior to the hearings.
5. Entire committee, including reader, must have full faculty status.

All exceptions must be approved by the Research Sequence Chair and Academic Dean prior to the proposal hearing and will only be allowed when a needed area of knowledge is unavailable on ICSW's faculty.

The Dissertation Chair

All dissertation committee Chairs must be approved as "designated research faculty." Requirements for this designation are:

1. Must have a PhD
2. Must have participated on a minimum of 3 Committees at ICSW or another research institution (as full committee member, not reader)
3. Must have at least one professional publication or presentation at a major conference
4. Must have completed CITI training
5. Must have substantive knowledge of research methodologies
6. Must have full faculty status

ICSW maintains a list of approved research Chairs. Students are free to ask any approved Chair to guide their dissertation work. If a faculty member wishes to apply for approval, they should contact the Research Sequence Chair and Academic Dean. Any exceptions must be approved by the Research Sequence Chair and Dean and will only be allowed when there is no available approved Chair.

The Chair has responsibility for:

- Convening all team meetings of the committee and student
- Confirming acceptance of the proposed research by the IRB review committee prior to proposal hearing
- General overview of the dissertation research process
- Adherence to research plan as accepted by the committee
- Ethical conduct of the research
- Chairing the proposal and dissertation hearings
- Addressing concerns that arise among the committee members and the student
- Assuring that any concerns/changes recommended by committee members are in the final document
- Helping the student work with committee members as concerns/changes are addressed
- Adherence to ICSW policy as outlined in the *Policies and Procedures Manual* and the *IRB Manual*

The Dissertation Committee Members

Committee members serve as additional resources to the student representing various areas of expertise relevant to the project. The student is to keep members of the committee apprised of progress of the research, consult as needed, and submit drafts of the evolving document as appropriate.

The student may request that an individual from another equivalent academic institution be approved to serve on the committee when that individual has the expertise necessary for the dissertation work. Such exception requires permissions of the Chair, the Research Sequence Chair, and the Academic Dean, and will be approved only when equivalent expertise is not available on ICSW's faculty.

The Research Practicum Chair, student's advisor, and research faculty may assist the student to identify faculty members who qualify to serve as dissertation committee members and who have expertise in the particular subject matter or research design areas relevant to the student's topic.

The Dissertation Reader

Readers are considered members of the Full Committee and enter the process on two occasions: 1) prior to the proposal hearing; 2) prior to the final defense. Readers should be considered "a pair of fresh eyes," and though not part of the draft and response system, they are voting members at both the proposal hearing and final defense hearing.

Changes in Committee Composition

A student may request changes in the composition of the dissertation committee. This should be done in consultation with the committee Chair. A request should be made by both parties to the Chair of the Research Sequence, who will make the final decision in consultation with the Dean and all parties involved. Changes will be approved only after reasonable efforts to resolve problems have been made by all parties.

Only under extreme circumstances may a student request a change in Dissertation_Chair. The Chair of the Research Sequence should be consulted about such a request only after the student and committee Chair have exhausted other means to resolve differences. The Chair of the Research Sequence will make the final decision in consultation with the Academic Dean and all parties involved.

Institutional Review Board (IRB)

All research conducted under the auspices of ICSW must first be submitted to and approved by the IRB committee. This includes student dissertation research, any research conducted as part of class instruction, research by faculty or staff and outside submission.

Once the student's final dissertation proposal is complete, the student must submit a complete application to the Institutional Review Board, which reviews all ICSW sponsored research involving human subjects.

The IRB outline for the proposal and the protocol for submitting it must be followed. The outline and protocol are located on the website under Student Resources. This should not be done until the proposal document is complete, as the IRB can request to see the entire document. The IRB must approve the proposed research as meeting standards for protection of human subjects prior to proceeding with any dissertation research activity.

Dissertation Process

The dissertation process unfolds in the following stepwise format:

1. Students are approved to begin consultation on the development of their dissertation projects in the spring semester of their third year following successful completion of Research Methods I, II, and III. At this point students may consult with various faculty who possess expertise in areas of relevance to the student's project ideas. By the end of the third year, students should, through the process of these consultations, have selected a Chair who will guide them through the early development of a research project and the selection of a full committee. The student's advisor and research faculty may be contacted for advice and recommendations for choosing a dissertation Chair.
2. Student chooses a Dissertation Chair. The student must submit the Chair Approval Form to the Registrar and Director of Academic Services, who will provide the form to the Academic Dean and Research Sequence Chair for approval. This will typically happen in the third year of the student's academic work.
3. In conjunction with the approved Dissertation Chair, the student chooses the other two members of the Core Committee and one reader. This typically happens during the third year of a student's academic work. The student must submit the Committee Approval Form to the Registrar and Director of Academic Services, who will provide the form to the Academic Dean and Research Sequence Chair for approval.

4. Once a full committee has been approved, the student and committee (minus reader) will meet as a team for the Initial Planning Meeting in order to discuss a plan, roles (e.g., literature review, methodology), and ways of proceeding. The Chair of the committee will convene this meeting, and will be responsible for keeping a record of what is decided. The Chair will submit the Initial Planning Meeting form to the Registrar and Director of Academic Services.
5. The Chair calls the proposal hearing. No hearing should be held without dialogue between the Chair and rest of the team affirming the readiness of the document for a hearing. The proposal hearing must be approved by the Registrar and Director of Academic Services and VP, Finance and Operations, prior to scheduling in order to ensure that all ICSW requirements are met for holding the hearing. It is the student's responsibility to contact the Registrar and Director of Academic Services and the VP, Finance and Operations, to obtain written approval to proceed, after which the Chair may work with the Full Committee to schedule the hearing.
6. In addition to regular meetings/consultations between the student and members of the Core Committee, the student and Core Committee (minus readers) must meet annually (in person or by webcam) following the approval of the proposal and until the final defense. The student must be prepared to provide updates about the research at this time. The Chair is responsible for convening the meeting, and for submitting the Annual Meeting form to the Registrar and Director of Academic Services as notice that it has occurred.
7. The final dissertation defense must be held within four years of the proposal approval in order to prevent the aging of data. If this deadline passes, the student will need to recollect data and possibly resubmit the proposal for another IRB review and hearing. This decision will be up to the dissertation committee and Chair of Research.
8. Once the student has a final dissertation draft ready for review, it is sent to the Chair for approval. Students should allow for 3 weeks for this review. The Chair must provide feedback during that time frame. If grammar editing is required by the Chair in response to the Chair's review, the student will hire and pay for that editing. Any revisions to the document at this point will add time to the dissertation process.
9. Once the Chair gives final approval to the document, the student sends out the document to the other two core committee members. The student should meet with the committee members for feedback and make appropriate changes under the guidance of the Chair. It is also possible (depending on the Chair's direction) that all feedback from the core committee will be given directly to the Chair.
10. Once all three members of the committee concur that the document is ready for defense, the student sends the document out to the reader. Depending on the committee's wishes, the final document may be copied and loose bound for committee members and shipped to the address of their choosing. If a committee member prefers an electronic copy of the document, it will not be necessary to bind and ship in this case. The student should plan for the committee to have the final document for up to one month prior to the final hearing. The committee, including the reader, must provide feedback to the student during that time.
11. The student must receive approval from the Registrar and Director of Academic Services and the VP, Finance and Operations, to schedule the hearing. It is the student's responsibility to contact the Registrar and VP for a file review. They will provide confirmation in writing to the student that they may proceed with a final hearing; the student should share this approval with their Chair.
12. Students should prepare a final abstract to bring to the final hearing.
13. Approval of both research proposals and dissertations require affirmative votes by four out of five Full Committee members.
14. Both the proposal and final dissertation must be submitted to Turnitin by the Chair prior to the hearings.
15. Faculty and student attendance at both the proposal and final hearings may be in person or via

Zoom when attendees are unable to travel or it is not in the best interest of a student or member of a committee to do so. Any committee person who is absent must provide written commentary on the proposal or dissertation to the student and Chair. It is rare that a hearing can take place without all members present. Students must prepare for this in the timing of their final defense.

16. All dissertations must be written according to the 7th Edition APA Manual from the beginning- Please check the document for style compliance before sending a final electronic copy to the Registrar & Director of Academic Services for uploading to the UMI/Proquest database.
17. Students should be aware of the time required for review, editing, and approval processes in relation to dissertation work. A dissertation should be in final draft form to give to the Chair three to four months prior to the final defense (which does guarantee full committee by any particular deadline). The time the process will take after this is variable and will depend on committee feedback, and the quality of the student's work.

Suggested Dissertation Timeline

(these are the suggested latest possible times for ensuring you'll be fully approved in time for graduation)

June Graduation:

November 1: Final dissertation draft to Chair for approval

January 1: Chair-approved and hearing-ready document to full committee March 1: Dissertation approval by full committee

January Degree Conferral:

July 1: Final dissertation draft to Chair for approval

September 1: Chair-approved and hearing-ready document to full committee

October 15: Dissertation approval by full committee

Dissertation Proposal and Defense Hearings

Proposal Hearings and final Dissertation Defense Hearings can be held on the following conditions:

1. The student has a full file review with the Registrar & Director of Academic Services and VP, Finance Operations, who indicate that the student's file is complete and prerequisites have been met (details below)
2. The full committee, as indicated by the Chair, approves the student's readiness to have a Hearing
3. The student is current with financial obligations to ICSW. The student must have no outstanding financial obligations prior to final Dissertation defense
4. The student is in good academic standing
5. The project has current IRB approval
6. Citi certification for student
7. The student has passed both the Case Presentation and the QTE

File Requirements for Dissertation Defenses:

1. All work in the clinical practicum must be complete
2. Annual meeting form (if committee hasn't met since proposal hearing)
3. Hearing must occur within four years of proposal hearing (to prevent aging of data)
4. Students may not have any outstanding financial obligations to ICSW

The Proposal Hearing

The proposal is submitted to the student's assigned Dissertation Committee selected by the student and the Chair. These four faculty members hold a hearing with the student and evaluate the proposal. The committee members, considering feedback from the reader, vote to pass, conditionally pass, or fail the proposal. If the proposal is not approved, the student is expected to rewrite it, following the recommendations of the committee, and to present it again at another hearing. If the proposal is conditionally approved, the student is expected to make specific changes recommended and submit them to the committee and reader for approval. If the proposal is approved, the student may proceed with the dissertation. A majority vote of the committee is required for approval. Following approval of a proposal, the Dissertation Committee is responsible for assisting the student in completing the dissertation and for approving or rejecting a completed dissertation.

Function of the Proposal and Hearing

- The proposal document is a blueprint of the research project that demonstrates a knowledge of the relevant literature, a question for study or hypothesis to be tested, a sound research plan, and theoretical framework for interpretation of the findings. This should be in publishable form.
- The document is also a contract between the student and the committee defining the area of inquiry, method and general work plan for the project.
- The hearing is an oral presentation of the proposed research in addition to the previously circulated document. It is a public format where committee members and readers can ask for clarification, raise methodological or epistemological issues and/or general concerns. Any additions or changes delineated by the committee are to be included in a revised proposal document. Depending on the nature of the changes, the document may have to be resubmitted to the committee or the Chair.
- The hearing is an open meeting; however, the student should use discretion when inviting individuals to the hearing.

The Dissertation Defense Hearing

An acceptable dissertation is one that contributes to understanding of a clinical phenomenon or population and to theoretical knowledge, uses sound principles of inquiry, has empirical grounding, and has relevance to clinical social work practice. Scientific and humanistic orientations to knowledge are valued, and a wide range of research approaches is available and acceptable. The student, the Dissertation Committee members and the same faculty who served as the reader for the proposal hearing attend the Dissertation Defense Hearing. The committee members vote to pass with distinction, pass, or fail the completed dissertation and paper. If the dissertation is not approved, the student is expected to rewrite it, following the recommendations of the committee, and to present it again at another hearing. A vote of three (out of four) is required for approval. All documents must be in a final edited format. If the documents are approved, the student may continue to the final steps in completing the dissertation.

The defense hearing is an open meeting; however, it is a defense of the work and the student should be prepared to answer any relevant question in a thorough, diplomatic, and collegial manner. The student should exercise discretion in inviting guests to the hearing. Members of ICSW may attend; family members are not appropriate guests at the hearing.

Final Steps

Following approval of the dissertation, the committee notifies ICSW of their decision through submission of the defense evaluation forms. The student must submit an electronic copy of the approved dissertation (including abstract) to the Registrar and Director of Academic Services after having made any required

corrections or revisions. The 7th Edition of the APA Manual should guide the student in completion of the final form of the dissertation. The Registrar and Director of Academic Services will submit the student's dissertation for UMI/Proquest Dissertation Publishing on the student's behalf.

Qualifying Theory Exam

Purpose

A Qualifying Theory Exam (QTE) will be part of the ICSW assessment of student learning along with the Dissertation and Case Presentation. Students who matriculated before 2017 will work on the Qualifying Theory Exam during their fourth year and will submit it by the end of Spring semester of that year. Students who matriculated in 2017 and after will work on the Qualifying Theory Exam during their third year and submit it by the end of Summer semester of that year. The QTE provides a measure of each student's ability to meet the standards of academic scholarship that are consistent with the goals of the Conceptual Foundation Sequence and are consistent with the academic discipline of clinical social work. To submit the Qualifying Theory Paper, students will need to have completed all theory courses, completed the first year Research Sequence courses, passed their Case Presentations, and have no outstanding financial balance with ICSW. The Qualifying Theory Exam will be part of the ICSW assessment of student learning, along with the Dissertation and Case Presentation.

Format

The QTE may vary in format from year to year, but the basic format will entail a paper and/or oral exam to questions formulated by the QTE Committee. An oral discussion may be required between the student and a QTE panel, based on the paper. Students will work on the Qualifying Theory Exam during their third year and will submit it by the end of Summer semester of their third year. The written paper and/or oral exam provides a measure of each student's ability to meet the standards of academic scholarship that are consistent with the goals of the Conceptual Foundations Sequence and with the academic discipline of clinical social work. If an oral discussion is required, it would provide an assessment of the student's ability to articulate verbally, their conceptual learning in the program, as consistent with the goals of the CF Sequence and ICSW's mission of training scholars.

Evaluation Process

An evaluation instrument for the QTE is developed by the Conceptual Foundations Chair in consultation with the QTE Committee, ICSW Institutional Researcher, and the Dean. The student must pass the QTE in order to proceed to the dissertation proposal hearing. The evaluation instrument is used to evaluate the student's written and/or oral success at demonstrating that the student has met ICSW's standards for academic scholarship. It addresses the degree of conceptual understanding demonstrated, the degree of complexity of thinking, and the quality and clarity of the writing.

The QTE panel will evaluate the papers and/or oral presentation. The Chair of the Conceptual Foundations Sequence will assign QTE committee members as evaluators. The student will have two opportunities to successfully pass the written and/or oral exam. The student will be advised that they cannot proceed with the dissertation proposal until passing the full QTE exam (paper and/or oral). If the student does not pass the QTE exam (paper and/or oral), the Committee and Academic Dean will develop a plan for remediation which will be shared with the student. If the student does not pass after the second attempt, the Student Progression Committee will be asked to review the student's progress and make recommendations to the Dean regarding the student's future in the program.

Student Support for the QTE

Each student will be assigned a member of the CF faculty as Theory Mentor for consultation on the preparation for the QTE. This assignment will occur in the student's first year. It will be the student's and Theory Mentor's responsibility to schedule monthly meetings in order to prepare for the QTE throughout the three years of coursework. Students will have a Capstone Theory review course in the spring of their third year to further prepare for the QTE in the summer semester.