

**American Public University System, Inc.
Title IX Compliance Policy**

1. Introduction

It is the policy of American Public University System, Inc. (APUS) to take prompt and appropriate steps when it is made aware of possible sexual misconduct, which may include, but is not limited to, sexual discrimination, sexual harassment, or sexual violence, that denies or limits on the basis of sex an employee's ability to provide aid, benefits, or services to students, or a student's ability to participate in or benefit from APUS's programs and activities (**Title IX Offense**).¹ If APUS determines that a Title IX Offense has occurred, APUS shall take prompt and effective steps reasonably calculated to eliminate the Title IX Offense, prevent its recurrence, and, as appropriate, remedy the effects of any hostile environment created by the Title IX Offense.

Inappropriate conduct that may constitute or otherwise be construed as a Title IX Offense committed against any member of the APUS community is prohibited. All Title IX complaints involving one or more students shall be processed in accordance with the Title IX Grievance Procedures (**Grievance Procedures**) attached hereto as Exhibit B. Title IX complaints involving only employees shall be processed through Human Resources in accordance with the University's anti-discrimination and harassment policy. Notwithstanding the foregoing, if a Title IX complaint involves an individual who is both an APUS student and employee, then the individual's role at the time of the event in question will control. For example, if an individual is both an APUS student and employee and alleges a Title IX Offense against a faculty member from whom the individual is taking a course, then the individual shall be treated as a student and the Grievance Procedures will be used to process the complaint. Alternatively, if the same individual alleges a Title IX Offense against the individual's manager, then the individual shall be treated as an employee and the University's anti-discrimination and harassment policy will be used to process the complaint. APUS shall in all instances and in its sole discretion make the decision of whether the complaint will be processed in accordance with the Grievance Procedures or in accordance with the University's anti-discrimination and harassment policy, as described above. In all cases, the Title IX Coordinator (hereinafter defined) shall be kept apprised as Title IX complaints are processed and resolved through the aforementioned channels.

It is APUS's policy to protect any complainant alleging a Title IX Offense and to ensure the complainant's safety as necessary, including taking interim steps to protect the complainant prior to the final outcome of any investigation. APUS's goal is to resolve Title IX complaints promptly and equitably and provide a safe and nondiscriminatory environment for all students and employees, free from sexual harassment and sexual violence.

2. Notice of Nondiscrimination

A notice of nondiscrimination shall be widely disseminated to all students, employees, applicants for admission and applicants for employment by being posted on the APUS website and published in electronic publications of general distribution that provide information about APUS's services and policies, which publications may include, but are not limited to, the employee (faculty and staff) handbooks, student handbook, and student code of conduct. The notice shall state that (a) APUS does not discriminate on the basis of sex in its education programs and activities, (b) APUS is required by Title IX not to discriminate in such a manner, and (c) questions concerning Title IX may be referred to APUS's Title IX Coordinator or to the Office for Civil Rights at the United States Department of Education. The

¹ Additional defined terms, including but not limited to "sexual misconduct", "sexual harassment", and "sexual violence" are attached hereto as Exhibit A.

notice of nondiscrimination shall include the name or title, office address, telephone number and email address of APUS's Title IX Coordinator.

3. Assistance Following an Alleged Title IX Offense

APUS may take interim measures to protect the complainant and witnesses, as necessary, during any criminal or APUS-led investigation into a Title IX complaint and before the final outcome of any APUS-led investigation. To the extent APUS does not routinely offer services that may constitute appropriate interim measures, APUS shall make a good faith effort to enter into memoranda of understanding with support services agencies as may be necessary to meet APUS's Title IX obligations. All such memoranda and activities thereunder shall comply with the requirements under the Federal Educational Rights and Privacy Act (20 U.S.C. § 1232g) and its implementing regulations (34 C.F.R. Pt. 99), as each may be amended from time to time.

Any victim of a Title IX Offense should be aware of the options to seek treatment for injuries, preventative treatment for sexually transmitted diseases, and other services. Victims are encouraged to discuss with health care providers, APUS officials, and first responders the option of seeking medical treatment and are encouraged to preserve evidence, which may be necessary to prove a crime has occurred, or to obtain a protective order. A victim of an alleged Title IX Offense may report such offense to law enforcement agencies or APUS employees, including the Title IX Coordinator. Victims may, at their choosing, (a) directly notify law enforcement authorities, (b) be assisted by APUS authorities in notifying law enforcement authorities, or (c) decline to notify such authorities. Victims also may be able to obtain protective, no contact, restraining, or similar lawful orders issued by an appropriate court.

APUS will provide counseling services without charge to the complainant if APUS determines that counseling is an appropriate interim measure. APUS shall notify the complainant of complainant's options to avoid contact with the alleged perpetrator and change, as appropriate, academic, professional, and extracurricular activities as well as complainant's living, transportation, dining, and working situation. APUS shall ensure that the complainant is aware of (a) complainant's Title IX rights, (b) available support services and resources, and (c) the right to report an alleged crime to local law enforcement. A non-exhaustive list of available assistance options are attached hereto as Exhibit C.

4. Title IX Coordinator

APUS shall designate at least one employee to coordinate APUS's efforts to comply with and carry out its responsibilities under Title IX (the **Title IX Coordinator**). APUS's current Title IX Coordinator is Caroline Simpson, who may be contacted by email at: TitleIX@apus.edu, by phone at: 703-396-6428, and by mail at: American Public University System, Inc. Attn: Caroline Simpson 10110 Battleview Pkwy Suite 114, Manassas, VA 20109.

The Title IX Coordinator shall:

- Have knowledge of the Title IX requirements, APUS's Title IX policies and procedures, and all Title IX complaints made to APUS;
- Receive appropriate training to meet his or her Title IX responsibilities;
- Review all Title IX complaints to identify and address any patterns or systemic problems;
- Be accessible to students and employees as appropriate; and
- Not hold job duties that create a conflict of interest with those of the Title IX Coordinator.

A Deputy Title IX Coordinator shall be appointed to support the Title IX Coordinator fulfill the duties of the position and shall function as a designee of the Title IX Coordinator. As such, any action taken by the

Deputy Title IX Coordinator shall be treated as an action taken by the Title IX Coordinator. APUS's current Deputy Title IX Coordinator is Michelle Newman, who also may be contacted by email at TitleIX@apus.edu, by phone at 703-334-4718, and by mail at: American Public University System, Inc. Attn: Michelle Newman 10110 Battleview Pkwy Suite 114, Manassas, VA 20109.

5. Reporting Policies and Protocols

This Title IX Policy is intended to make APUS students and employees aware of the various reporting and confidentiality policies available to them to make informed choices about where to turn should they become a victim of a Title IX Offense and how to report problems relating to any subsequent retaliation related thereto.

a. Reporting Options

Individuals who have been the victim of a Title IX Offense may use any combination of the following options to report a Title IX Offense:

- i. Criminal Complaint – A complaint filed with local law enforcement officials and with which APUS is not involved.
- ii. Report to Responsible Employee - Reports made to any “responsible employee,” as that term is defined in Exhibit A, must be relayed by the responsible employee to the Title IX Coordinator and will initiate an investigation by APUS in accordance with this Policy.
- iii. Institutional Complaint – A complaint filed with the Title IX Coordinator and upon the receipt of which APUS will initiate an investigation in accordance with this Policy.
- iv. Privileged and Confidential Reporting - Complainants may make privileged and confidential reports of Title IX Offenses to certain health or mental health providers or pastoral counselors. While criminal complaints, institutional complaints, and reports to responsible employees will generally result in the initiation of an investigation, whether by law enforcement or APUS (unless the complainant requests otherwise of APUS, and APUS is able to honor such request consistent with its Title IX obligations), reports to certain health or mental health providers or pastoral counselors may be privileged and may remain confidential so long as the complainant does not represent a threat to his or herself or to others. Note, however, that not all communications with health or mental health providers or pastoral counselors may be privileged.

b. Responsible Employee Reporting Requirements

- i. Before a complainant reveals information to a responsible employee that the complainant wishes to keep confidential, the responsible employee should make every effort to ensure that the complainant understands: (a) the responsible employee's obligation to report to the Title IX Coordinator the names of the alleged perpetrator (if known), complainant, and other parties (if any) involved in the alleged Title IX Offense, as well as relevant facts regarding the alleged incident; (b) the complainant's option to request that APUS maintain the complainant's confidentiality, which request APUS will consider consistent with APUS's responsibilities under Title IX; (c) the complainant's ability to share the information with counseling, advocacy, health, mental health, and sexual-assault-related service providers who may be able to maintain the complainant's confidentiality; and (d) the complainant's right to file an institutional complaint with the Title IX Coordinator and a criminal complaint with local law enforcement.
- ii. Upon receipt of a report of an alleged Title IX Offense, a responsible employee shall promptly report to the Title IX Coordinator all relevant details about the alleged Title IX Offense that a complainant has shared and that APUS needs to determine what occurred and how to resolve the situation, including the names of the alleged perpetrator (if known), the

- complainant, and other parties (if any) involved, as well as the date, time and location of the alleged Title IX Offense.
- iii. Responsible employees do not need to determine whether the alleged Title IX Offense actually occurred or that a hostile environment has been created before reporting the alleged Title IX Offense to the Title IX Coordinator.
- c. Requests for Confidentiality
- i. Upon receipt of an institutional complaint or report from a responsible employee, APUS will act promptly to protect the complainant. The Title IX Coordinator and other appropriate APUS personnel (if any) shall determine in cooperation with the complainant whether appropriate law enforcement or other authorities should be notified.
 - ii. The Title IX Coordinator shall evaluate and determine whether to honor complainant requests for confidentiality, or requests that an investigation not be pursued. Such requests shall be evaluated based on APUS's responsibility to provide a safe and nondiscriminatory environment for all students and employees.
 - iii. APUS employees shall only disclose information regarding alleged Title IX Offenses on a "need to know" basis to individuals who are responsible for handling APUS's response. In the event APUS determines that it can respect a complainant's request for confidentiality, APUS shall take all reasonable steps to respond to the institutional complaint or responsible employee report consistent with the request and to determine what interim measures are appropriate or necessary. In the event APUS determines it must disclose the complainant's identity to an alleged perpetrator, APUS shall inform the complainant prior to making the disclosure.

6. Investigation Procedures and Protocols

APUS shall process all institutional complaints and reports received from responsible employees, regardless of where the alleged Title IX Offense geographically occurred, to determine whether the conduct involved an APUS education program or activity, the provision of aid, benefits, or services to APUS students, or the creation of a sexually hostile environment. Upon initiating an investigation, the investigator shall notify APUS employees and students who are believed to have documentary, electronic, or tangible evidence to preserve such evidence. APUS may, in its sole discretion, conduct remotely any Title IX investigation, in whole or in part, using telephonic, electronic and other remote means.

APUS shall coordinate its Title IX investigation with any other ongoing APUS or criminal investigation of the incident. If the fact-finding portion of APUS's investigation is suspended due to the existence of a criminal investigation, it shall resume promptly once law enforcement officials have completed their evidence-gathering and have authorized APUS to proceed with its investigation.

Title IX prohibits retaliation against an individual because he or she participated in any manner, in APUS's investigation. APUS shall take steps to prevent retaliation and shall promptly investigate any possible retaliation, including threats, intimidation, coercion, or discrimination. APUS shall take appropriate steps to address any identified retaliation consistent with its Title IX obligations.

7. Grievance Procedures

APUS has jurisdiction over Title IX complaints and has adopted the Grievance Procedures attached hereto as Exhibit B to promptly and equitably resolve institutional complaints or reports from responsible employees received by the University. The Grievance Procedures shall be used to address Title IX complaints involving one or more students. All employee-only Title IX complaints shall be processed by Human Resources in accordance with the University's anti-discrimination and harassment policy.

8. Prevention, Education and Training

This Policy and related information and training shall be accessible to students and employees with disabilities as well as those who are English language learners. Title IX prohibits retaliation against the complainant, anyone who files a third-party report, any witness, or anyone who otherwise participates in the investigative and disciplinary processes. APUS will take steps to prevent and respond to such retaliation consistent with its Title IX obligations.

APUS shall provide prevention and awareness educational programs to new and existing students and employees. These programs shall include information on (a) Title IX, (b) how to file a Title IX complaint with APUS, (c) resources available to sexual violence victims, and (d) options for reporting an incident of sexual violence to local law enforcement. Training on this Policy and APUS's Title IX obligations will be provided to students and employees. APUS shall consider educational methods that are most likely to help students and employees retain such information. APUS requires that the Title IX Coordinator, investigators, and adjudicators have (a) training or experience in handling Title IX complaints, and, if applicable, (b) training in the operation of the Grievance Procedures.

EXHIBIT A DEFINITIONS

As used in APUS's Title IX Compliance Policy and Title IX Grievance Procedures, the phrases and words listed shall have the meanings set forth below:

Consent - Verbal statements or non-verbal actions which a reasonable person would understand to mean a voluntary agreement to engage in sexual activity. Someone who is incapacitated cannot consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another person. Consent can be withdrawn at any time. Coercion, force, or threat of either invalidates consent.

Dating violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship. "Dating violence" includes, but is not limited to, sexual or physical abuse or the threat of such abuse, but does not include acts covered under the definition of domestic violence.

Domestic violence - A felony or misdemeanor crime of violence committed by (a) a current or former spouse or intimate partner of the victim, (b) a person with whom the victim shares a child in common, (c) a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner, (d) a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or (e) any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Incapacitation - Any situation in which a person is incapable of giving consent due to the person's age, state of consciousness, use of drugs or alcohol, or an intellectual or other disability.

Intimidation - The intentional act of coercing or frightening someone to engage or not engage in conduct of a sexual nature against that person's will.

Hostile environment - Activity or conduct involving sexual harassment that is sufficiently serious that it interferes with or limits an APUS employee's ability to provide aid, benefits, or services to students or a student's ability to participate in or benefit from APUS's programs and activities.

Non-consensual sexual contact - Any physical touching of a sexual nature which is not preceded by consent or which continues after a previous consent is withdrawn.

Non-consensual sexual intercourse - Any sexual intercourse which is not preceded by consent or which continues after a previous consent is withdrawn. "Sexual intercourse" includes vaginal or anal penetration by a penis, object, tongue or finger, and oral copulation.

Responsible employees - Responsible employees include the Title IX Coordinator and other APUS employees (i) with the authority to take action to redress sexual violence, (ii) who have been given the duty of reporting Title IX Offenses by or against students to the Title IX Coordinator or to another appropriate University designee, or (iii) whom a student could reasonably believe has this authority or duty.

Retaliation - The act of seeking revenge upon another person, including intimidating, threatening, coercing, or in any way discriminating against an individual because of an individual's complaint or cooperating in the filing of a complaint or conduct of an investigation. Retaliation is prohibited by Title IX and this Policy.

Sexual assault - An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting program.

Sexual exploitation - The abuse of a position of vulnerability, differential power, or trust for sexual purposes.

Sexual harassment - Unwelcome conduct of a sexual nature.

Sexual misconduct - Any act of sexual harassment, sexual discrimination (including on the basis of gender identity and sexual orientation), sexual violence, sexual assault, non-consensual sexual contact, non-consensual sexual intercourse, sexual exploitation, stalking, intimidation, dating violence, or domestic violence, or any act that creates a hostile environment or any act of retaliation against a complainant or anyone involved in a complaint brought under APUS's Title IX Grievance Procedures in accordance with APUS's Title IX Compliance Policy.

Sexual violence - Physical sexual acts perpetrated against a person's will or with a person who suffers from incapacitation. "Sexual violence" also means same-sex conduct that violates APUS's prohibition on sexual violence, including, but not limited to, the following examples: forcible rape, forcible sodomy, sexual assault with an object, and forcible fondling.

Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (a) fear for the person's safety or the safety of others, or (b) suffer substantial emotional distress. As used in this definition, "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; "substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling; and "reasonable person" means a person under similar circumstances and with similar identities to the victim.

Title IX Coordinator - The person designated as such by APUS or the person temporarily designated by the Title IX Coordinator to serve in that capacity during the Title IX Coordinator's incapacity or absence from APUS.

EXHIBIT B
AMERICAN PUBLIC UNIVERSITY SYSTEM, INC.
TITLE IX GRIEVANCE PROCEDURES

1. Introduction

American Public University System, Inc. (APUS) has adopted a Title IX Policy (**Policy**), all of the provisions of which are incorporated herein by reference. In accordance with Section 7 of the Policy, APUS adopts and publishes the following Title IX Grievance Procedures (**Grievance Procedures**) for the prompt, fair, impartial and equitable investigation and resolution of Title IX complaints, including, but not limited to, complaints of sexual misconduct, sexual discrimination, sexual harassment, and sexual violence, alleging that such conduct denied or limited on the basis of sex an employee's ability to provide aid, benefits, or services to students, or a student's ability to participate in or benefit from APUS's programs and activities (**Title IX Offense**).²

All Title IX complaints involving one or more students shall be processed in accordance with these Grievance Procedures. Title IX complaints involving only employees shall be processed through Human Resources in accordance with the University's anti-discrimination and harassment policy. Notwithstanding the foregoing, if a Title IX complaint involves an individual who is both an APUS student and employee, then the individual's role at the time of the event in question will control. Please refer to the Policy for an illustrative example involving such an individual. APUS shall in all instances and in its sole discretion make the decision of whether the complaint will be processed in accordance with the Grievance Procedures or in accordance with the University's anti-discrimination and harassment policy, as described above. APUS aims to complete the procedures set forth herein within sixty (60) days of receiving a Title IX complaint, unless multiple complainants or incidents are involved, or the facts and circumstances of a particular complaint, merit additional time, as APUS may determine in its sole discretion and which determination shall be promptly communicated via email to the parties. *APUS may, in its sole discretion, implement remotely any or all portions of these Grievance Procedures using telephonic, electronic and other remote means.*

These Grievance Procedures explain (i) how to file a Title IX complaint, (ii) APUS's Title IX informal resolution, investigative, decision-making, and appeals processes, and (iii) how resulting remedies and sanctions will be imposed.

2. Initiation of a Complaint

Any person who believes that he or she has been the victim of a Title IX Offense may file a written institutional complaint with the Title IX Coordinator identified in the Policy. Complainants have the right to concurrently file a criminal complaint with appropriate law enforcement agencies and an institutional complaint with APUS. Any institutional complaint filed with APUS shall specify the alleged Title IX Offense, the name of the individual(s) who engaged in the alleged Title IX Offense, if known, and such other information as may assist APUS in promptly investigating the alleged Title IX Offense. The complainant may request confidential treatment and the Title IX Coordinator shall evaluate all such requests as set forth in Section 5 of the Policy.

3. Informal Resolution Process

Mediation is never appropriate in cases of alleged sexual assault and shall not be utilized by APUS in such cases. However, in cases alleging non-sexual assault conduct, the Title IX Coordinator shall informally discuss possible remedies and sanctions with the complainant and the alleged perpetrator separately to ascertain if a satisfactory resolution can be reached. APUS shall refrain from asking a

² Additional defined terms, including but not limited to "sexual misconduct", "sexual harassment", and "sexual violence" are attached as Exhibit A to the Policy.

complainant to resolve problems directly with the alleged perpetrator. If resolution can be reached, the remedies and sanctions to which the parties agree shall be imposed. If resolution cannot be reached, the Title IX Coordinator shall proceed with the investigative process described in Section 4. A complainant has the right at any time to end the informal resolution process and begin the formal investigative process described in Section 4.

4. Investigative Process

The Title IX Coordinator or designee shall promptly investigate the alleged Title IX Offense in accordance with Section 6 of the Policy. It is APUS's goal to provide for an adequate, reliable, and impartial investigation and resolution of each institutional complaint. Retaliation against the complainant, alleged perpetrator, witnesses, or any other participant involved in a Title IX investigation is prohibited. In the event APUS is unable to conduct a full investigation, such as when the alleged perpetrator is a visitor to APUS property or is not otherwise affiliated with APUS, APUS shall take steps to provide remedies for the complainant and the broader student and employee populations, as APUS may deem appropriate.

Upon the conclusion of the investigation, the Title IX Coordinator shall determine whether the preponderance of the evidence demonstrates that the alleged Title IX Offense occurred. If the Title IX Coordinator does not so determine, then the complaint shall be dismissed (**Complaint Dismissal**), and the complainant and the alleged perpetrator shall be notified concurrently in writing of APUS's determination. If, however, the Title IX Coordinator determines that the preponderance of the evidence demonstrates that the alleged Title IX Offense occurred, then the Title IX Coordinator shall notify the complainant and the alleged perpetrator concurrently in writing of such determination and proceed with the decision-making process set forth in Section 5.

5. Decision-Making Process

If the Title IX Coordinator determines by the preponderance of the evidence that the alleged Title IX Offense occurred, the Title IX Coordinator shall prepare findings of fact and recommended remedies, accommodations, and sanctions (**Findings**). The Title IX Coordinator shall also make a finding of fact as to whether a "hostile environment", as defined in Exhibit A of the Policy, exists at APUS in light of the Findings, and if so, shall make recommendations as to how the hostile environment can be eliminated. Within five (5) days of preparing the Findings, the Title IX Coordinator shall use the Findings to determine what, if any, remedies, accommodations, and sanctions for the complainant and alleged perpetrator, and additional remedies for the APUS community, shall be imposed (**Ruling**). If the Ruling includes a determination that sexual misconduct has occurred, then APUS shall provide for the continued protection of the complainant and others, as appropriate.

Within five (5) days following the Ruling, APUS shall concurrently send notice via email to the parties of the Ruling and of each party's right to appeal pursuant to Section 6. APUS shall notify the parties whether APUS found that the alleged Title IX Offense occurred, any sanctions imposed on the perpetrator that directly relate to the complainant, and other steps APUS has taken to eliminate the hostile environment (if APUS finds one to exist), prevent recurrence of the misconduct, and remedy discriminatory effects on the complainant and others. APUS shall also notify the complainant of any individual remedies offered or provided to the complainant, but, shall not notify the perpetrator of these individual remedies. If the alleged victim is deceased as a result of the Title IX Offense in question, the next of kin of such victim is treated as the alleged victim and shall be provided written notification as set forth herein.

6. Appeals

Either party may appeal the Complaint Dismissal or Ruling by submitting a written statement of appeal to the Office of the Provost. The appeal must be received by the Office of the Provost within seven (7) days

following the date on which the parties received notice of the Complaint Dismissal or Ruling. The Office of the Provost shall have an additional seven (7) days from receipt of the appeal request to grant or deny the appeal, or request additional information from the appealing party and the Title IX Coordinator that the Office of the Provost deems necessary to decide the appeal request. Regardless of which party files the appeal, the Office of the Provost may reverse the Complaint Dismissal or Ruling only if the Office of the Provost finds that the determination was arbitrary or capricious or was not otherwise supported by the preponderance of the evidence. If the appeal is granted, the Office of the Provost shall make such instructions to the Title IX Coordinator as may be appropriate.

The Office of the Provost's decision on the appeal shall constitute the final action by APUS, and APUS shall send written notice of the Office of the Provost's decision and its finality via email concurrently to the parties. If neither party appeals the Complaint Dismissal or Ruling within the seven (7) day appeal window, APUS shall send notice via email concurrently to the parties that the time for an appeal has expired and that the Complaint Dismissal or Ruling is deemed final.

7. Imposition of Remedies, Accommodations, and Sanctions

After a Ruling has become final, APUS shall take steps necessary to implement the Ruling's remedies, accommodations, and sanctions. In the event interim measures should be taken to protect the complainant at any point prior to APUS's final determination, the Title IX Coordinator may implement such measures, a non-exhaustive list of which are set forth in Exhibit C of the Policy.

Exhibit C of the Policy also sets forth a non-exhaustive list of potential remedies for complainants, which APUS may impose, and include the reprimand, suspension, or expulsion of a student perpetrator, the reprimand, suspension, or termination of an employee perpetrator, and complainant's options to avoid contact with the alleged perpetrator and to change academic, professional, and extracurricular activities as well as complainant's living, transportation, dining, and working situation, as appropriate. Example counseling, advocacy, and support services also are provided in Exhibit C of the Policy.

Implementation of these Grievance Procedures may result in additional remedies for the APUS community, including greater emphasis on student awareness, educational, and professional development courses for students, faculty, and staff, and other steps designed to address the specific issues raised by a Title IX complaint received by APUS.

EXHIBIT C
NON-EXHAUSTIVE LIST OF ASSISTANCE OPTIONS

Prompt Assistance

Trained advocates and counselors who can provide an immediate or otherwise prompt, oftentimes confidential response in a crisis situation:

Shenandoah Women's Center
236 West Martin Street
Martinsburg, WV, 25401
24-hour Hotline: 304-725-7080

Sexual Assault Victim's Advocacy Service
13928 Jefferson David Hwy #C
Woodbridge, VA 22191
24-hour Hotline: 703-368-414

Phone numbers for law enforcement and the Title IX Coordinator:

In an emergency always dial 9-1-1

Charles Town Police Department:
304-725-2714

APUS Title IX Coordinator
Caroline Simpson: 703-396-6428

Manassas Police Department:
703-257-8000

APUS Deputy IX Coordinator
Michelle Newman: 703-334-4718

Ongoing Assistance

Counseling, advocacy, health, mental health and other support services for victims of a Title IX Offense, whether or not a victim chooses to make an official report or participate in APUS's disciplinary process or the criminal process, include, without limitation:

Shenandoah Women's Center
236 West Martin Street
Martinsburg, WV, 25401
24-hour Hotline: 304-725-7080

Sexual Assault Victim's Advocacy Service
13928 Jefferson David Hwy #C
Woodbridge, VA 22191
24-hour Hotline: 703-368-4141

Ongoing support during implementation of APUS's Grievance Procedures and the criminal process (if any) can be found as follows:

Caroline Simpson
Title IX Coordinator
TitleIX@apus.edu
703-396-6428

Michelle Newman
Deputy IX Coordinator
TitleIX@apus.edu
703-334-4718

Mauricia Blackwell
Director, Employee Relations &
Human Resources
mblackwell@apus.edu
304-724-2853

Jessica Jackson
Vice President, Human Resources
jjackson@apus.edu
304-885-5205

Interim Measures

APUS may provide immediate steps and interim measures to ensure the safety and well-being of the complainant, such as the ability to move office locations, change work schedules, alter academic schedules, withdraw from or retake a class without penalty, and access to academic support (*e.g.*, tutoring).

APUS may be able to provide additional interim measures for a complainant while an investigation is pending, such as no contact orders and a change in the alleged perpetrator's office space arrangements or course schedule. Any interim measures shall be identified and implemented by APUS in its sole discretion and based on the then known facts and circumstances of a particular Title IX investigation.