Introduction

To ensure broad communication, certain key University policies are published on an annual basis in a special policy section of the Record. These policies are also available in a number of other places, including the human resources website at http://hr.wustl.edu.

All members of the University community are essential to the continued endeavor for excellence in the teaching, research, service and patient-care missions. Establishing and sustaining an open, positive working and learning environment for faculty, staff and students is a shared responsibility. These key policies are intended to promote and support these efforts.

Washington University is committed to the maximum use of all human resources and the goal of equal opportunity. Every effort shall be made to ensure that all employment decisions, University programs and personnel actions are administered in accordance with the principles of equal employment opportunity.

I want to take this opportunity to reaffirm the University's commitment to equal opportunity in all aspects of our daily operations, including recruitment, hiring, training and promotion in all jobs without regard to race, color, age, religion, gender, national origin, veteran status, disability or genetic information. Should you have questions regarding any of these policies, please feel free to contact Human Resources.

Scot Bemis
Vice Chancellor for Human Resources and Institutional Equity

Drug and Alcohol Policy

Introduction and Policy Statement

Washington University is committed to maintaining a safe and healthful environment for members of the University community by promoting a drug-free campus as well as maintaining effective policies and procedures concerning the conduct of faculty, staff and students.

This policy is adopted in accordance with the Drug-Free Workplace Act and the Drug-Free Schools and Communities Act.

Standards of Conduct

Washington University strictly prohibits the unlawful possession or use of controlled substances or alcohol on University property or as a part of any University activity. All faculty, staff, students and visitors must comply with this policy as a condition of their affiliation with the University. Policy shall be enforced, possessed, or used controlled substances, alcohol, or drug paraphernalia on University property or at any of its activities, the University will require all employees and students to assist in conducting this investigation and shall inform the employee's locker, desk, or other University property under the control of the employee.

Workplace Drug Testing

All pre-employment drug testing will be performed by the University. With Human Resources approval and under the authority of the University, drug testing will be made for the University's current employees and students.

Testing Requirement for Commercial Drivers Licenses (CDLs)

To meet requirements of the U.S. Department of Transportation (DOT), the University has established a drug and alcohol testing program for all employees who are drivers of its commercial motor vehicles requiring commercial driver's licenses (CDLs), and who perform safety-sensitive functions.

The University reserves the right to require that an employee be tested, for example, when an employee is injured while using alcohol or non-prescribed controlled drugs.

Violations

Violations of the standards of conduct will be dealt with on a case-by-case basis following the policies and procedures applicable to, as appropriate, faculty, staff, students or visitors. Sanctions may include, among other things, reprimand, warning, suspension, probation, expulsion or termination. Referral to an appropriate assistance or rehabilitation program also may be appropriate. Referral for prosecution will be made in accordance with applicable law.

Drug and Alcohol Counseling, Treatment or Rehabilitation or Re-Entry Programs

Participation in the drug and alcohol testing program is a condition of employment for these positions. Participation in the drug and alcohol testing program is a condition of employment for these positions. Participation in the drug and alcohol testing program is a condition of employment for these positions.

Health Risks

Drugs: A detailed description of the health risks associated with the use of alcohol or non-prescribed controlled drugs is provided in the chart, Drug Uses and Effects, published by the U.S. Department of Justice's Drug Enforcement Administration (DEA). Sections 195.213 and 195.214 of the Missouri statutes make it a felony to display of hazardous material placards. This drug and alcohol testing program also applies to applicants selected for hire as designated safety-sensitive positions. Participation in the drug and alcohol testing program is a condition of employment for these positions. This program provides pre-employment drug testing for all positions which require successful completion of the urine drug screen. Positions which require specific drug testing will be identified in the job posting. In addition, the hiring manager will notify the final candidate when this requirement exists and post a contingent offer and acceptance, will work with the Office of Human Resources to conduct an employee's test to obtain a valid, confidential drug screen. "For Cause" Drug Testing Feature: With Human Resources approval and under the authority of the University, an employee may be required to display of hazardous material placards. This drug and alcohol testing program is a condition of employment for these positions of drugs or alcohol in an employee's system.

1. When there is reasonable suspicion that an employee is under the influence of drugs or alcohol;

2. When the employer has been involved in an on-the-job accident involving the University property or business and there is reasonable suspicion that drugs or alcohol may have caused or contributed to the accident;

3. When the employee is working in a position where public safety is at risk;

4. When the employer has a reasonable belief that an employee is under the influence of drugs or alcohol.

Legal Sanctions

Drugs: The manufacture, possession, sale, distribution, and use of controlled substances are prohibited by federal, state and local law. Provisions concerning the conduct of faculty, staff and students in this regard are found in the University's policies and procedures. Section 195.214 of the Missouri statutes makes it a class A felony to facilitate or deliver controlled substance to their supervisor. Prescribed medication should be kept in its original container, which identifies the name, date, drug, and prescribing doctor.

Sanctions on or near University property. Persons convicted of this offense can be sentenced to imprisonment for not less than 10 years. The Federal Controlled Substances Act prohibits the manufacture, distribution, dispensing, or dispensing of any controlled substance or the possession of any controlled substance with intent to manufacture, dispense, or distribute, or a detailed description of the penalties associated with this unlawful act.

Medical alerts and notifications are provided by the U.S. Department of Transportation (DOT), the University has established a drug and alcohol testing program for all employees who are drivers of its commercial motor vehicles requiring commercial driver's licenses (CDLs), and who perform safety-sensitive functions.

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Drugs: The manufacture, possession, sale, distribution, and use of controlled substances are prohibited by federal, state and local law. Provisions concerning the conduct of faculty, staff and students in this regard are found in the University's policies and procedures. Section 195.214 of the Missouri statutes makes it a class A felony to facilitate or deliver controlled substance
Policy on Discrimination and Harassment

Washington University is committed to providing a positive and safe learning and working environment for its students, faculty, staff and visitors. The University prohibits discrimination and harassment on the basis of race, color, national origin, age, religion, sex, sexual orientation, gender identity or expression, veteran status, disability or genetic information. This conduct may also violate federal, state or local law.

What is Discrimination?

Discrimination is generally defined as a material adverse action affecting the terms and conditions of education or employment that is based on one or more of the following characteristics (collectively referred to as "protected classes"): race, color, national origin, age, sex, sexual orientation, gender identity or expression, veteran status, disability or genetic information.

What is Harassment?

Harassment is a form of discrimination. It is generally defined as unwelcome conduct, on or off campus, that is based on race, color, national origin, age, religion, sex, sexual orientation, gender identity or expression, veteran status, disability or genetic information. Harassment can be written, oral, visual or physical.

Conduct Prohibited By Title IX

Title IX of the Educational Amendments of 1972 prohibits a specific subset of the conduct addressed above and in this Policy. Title IX and its implementing regulations prohibit discrimination based on sex (including sexual harassment and sexual violence), gender identity or expression, and any other basis specified by Title IX. Title IX also prohibits retaliation for any protected activity.

Conduct Prohibited: (also known as "quid pro quo" harassment);

- Unwelcome conduct by a University student or employee, or another individual, on the basis of race, color, national origin, age, religion, sex, sexual orientation, gender identity or expression, veteran status, disability or genetic information.
- Conduct that is intrinsic to education may sometimes be disturbing or unwelcome to the individual.
- Professions or activities within an academic institution or program that the University uses to achieve educational objectives (such as the academic program itself, or the type of conduct addressed by the Title IX Coordinator), or any instance of sex discrimination, including sex-based harassment (also known as "hostile environment" harassment); or
- Harassment can be written, oral, visual or physical. Some conduct obviously constitutes harassment, such as that based on a threat of violence or sexual advance. But whether particular conduct constitutes harassment will depend on (1) the specific context of the situation, including the participants' reasonable understanding of the situation, their past dealings, their professional relationship (e.g., supervisor-subordinate, professor-student), or the severity of the harassment or discrimination at issue, and other circumstances.
- Conduct is harassment if it is unwelcome and offensive and should cease. Such a communication often will cause the unwelcome behavior to stop, particularly where the person may not be aware that the behavior is offensive to the other person.
- If you believe you have been subjected to discrimination or harassment, you have a number of options. You may want to consult a social worker, therapist or cleric who may be permitted by law to assure confidentiality.
- Other University Action

When you wish to proceed, you may contact the Title IX Coordinator at any time (including during non-business hours), or by calling 1-800-421-3481. You may also be submitted to the United States Department of Education's Office for Civil Rights at 400 Maryland Avenue, S.W., Washington, DC 20202-1100, by visiting www2.ed.gov or by calling 1-406-421-3481.

Options for Resolution

If you believe you have been subjected to discrimination or harassment, you should route the selection you feel most appropriate for your circumstances. However you wish to proceed, you may contact the Title IX Coordinator at any time (including during non-business hours), or by calling 1-800-421-3481. You may also be submitted to the United States Department of Education's Office for Civil Rights at 400 Maryland Avenue, S.W., Washington, DC 20202-1100, by visiting www2.ed.gov or by calling 1-406-421-3481.

Potential disciplinary and remedial consequences for conduct prohibited by Title IX include, but are not limited to:

- • fine
- • research or travel funding
- • faculty Title IX Grievance Process
- • Discrimination Formal Complaint Process
- • Staff Title IX Grievance Process
- • Discrimination and Harassment Response Coordinator
- • Title IX Coordinator or of those accused of discrimination and harassment and impose disciplinary or remedial actions where warranted. The University also reserves the rights to suspend and dismiss in conjunction with other complaint or reporting processes.
- • Disciplinary or remedial actions
- • fine
- • loss of salary or benefit, such as sabbatical or research funding
- • suspension, probation, demotion, termination, dismissal, or other academic support services and accommodations.
- • Potential disciplinary and remedial consequences for violations of this Policy include but are not limited to the following:

Confidentiality

The University will strive to protect, to the greatest extent possible, the identities of persons reporting discrimination and harassment and of those accused seek refers. However, the University cannot guaran-
- • fine
- • loss of salary or benefit, such as sabbatical or research funding
- • suspension, probation, demotion, termination, dismissal, or other academic support services and accommodations.
- • Potential disciplinary and remedial consequences for violations of this Policy include but are not limited to the following:

Confidentiality

The University will strive to protect, to the greatest extent possible, the identities of persons reporting discrimination and harassment and of those accused seek refers. However, the University cannot guaran-
tee complete confidentiality where it would conflict with the University's obligation to investigate meaningfully or take corrective action. Even when some dis-
closure of the University's information or sources is necessary, it will be limited to the extent possible. The University will, to the extent permitted by law, keep confidential all records of complaints, responses and investigations.

Other University Action

The University reserves the right, independent of other complaint or reporting processes, to impose disciplinary or remedial actions concerning allegations of discrimination and harassment and impose disciplinary or remedial actions where warranted. The University also reserves the rights to suspend and dismiss in conjunction with other complaint or reporting processes.

Disciplinary or Remedial Actions

Potential disciplinary and remedial consequences for violations of this Policy include but are not limited to the following:

- • fine
- • loss of salary or benefit, such as sabbatical or research funding
- • suspension, probation, demotion, termination, dismissal, or other academic support services and accommodations.

Retaliation and Protection of Rights

The University will not tolerate retaliation against persons who report discrimination or harassment or against those who testify, assist or participate in any other manner in the reporting or reviewing a complaint of discrimination or harassment. In this con-
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- • fine
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- • suspension, probation, demotion, termination, dismissal, or other academic support services and accommodations.
individuals. Allegations of discrimination or harass-
ment must be made in good faith and not out of mal-
ice. Knowing a making a false or frivolous allegation of discrimination or harassment, whether in a formal or informal context, will be treated as a serious offense under this policy. If you have a reasonable basis to believe that a complaint of discrimination or harass-
ment against you was not made in good faith, you may use the procedures of this policy to seek redress.

Obligations of Vigilance and Reporting

The University can respond to specific instances and allegations of discrimination or harassment only if it is aware of them. The University therefore encourages anyone who believes that he or she has experienced dis-

rimination or harassment to promptly come forward with inquiries, reports or complaints and to seek assis-
tance from the University. In addition, any University employee who becomes aware of instances or allegations of discrimination or harassment by or against a per-
son under his or her supervisory authority, and any fac-
ulty member who becomes aware of instances or alle-
gations of discrimination or harassment against a stu-
dent, must report it to those charged with responding to such reports, such as a Coordinator, department head, director, or other similar administrator. It shall be the responsibility of these latter individuals to respond to reports of discrimination and harassment or refer them to other University officials for such response. Any department head, director, or other similar admin-
istrator who becomes aware of information indicat-
ing a significant likelihood of discrimination or harass-
ment must report such information to the Coordinator. These administrators must respond not only when they receive a specific report alleging improper activity, but also when such matters come to their atten-
tion informally. Unconfirmed or disputed allegations should be clearly labeled as such and reports should indicate any steps already taken to investigate or oth-
erwise respond. Administrators may wish to consult with a Coordinator prior to investigating or otherwise responding to any situation involving alleged discrimi-
nation or harassment.

Education

Education is the best way to prevent discrimination and harassment. Please contact one of the Coordinators below to find out more about available training pro-
grams and for information and assistance on how to handle issues involving discrimination and harass-
ment.

Other Policies and Procedures

This Policy and its associated procedures supersede any existing University, school, departmental or other poli-
ties and procedures concerning prohibited discrimina-
tion and harassment.

[1] Communications with ombudspersons are confi-
dential unless there is an imminent risk of seri-
ous physical harm or disclosure is compelled by a court. Communicating a concern to an ombud-
s person does not constitute notice to Washington University.

[2] If the complaint alleges a sexual assault or other crime, the complainant may also file a crimi-
 nal report with the Washington University Police Department or other appropriate law enforce-
ment agency. The Complainant may simultane-
ously pursue a criminal and University disciplinary processes. Ordinarily the University will not delay internal proceedings if criminal charges are filed, but may in certain circumstances postpone them while criminal proceedings are pending.

Appendix: Title IX/Discrimination and Harassment Response Coordinators

(as of May 23, 2023)

Title IX Coordinator

Jessica Kennedy 314-935-3118 jkckennedy@wustl.edu

Office: Umfrath Hall, Room 001

Address: One Brookings Drive, MSC 1175-0153-0B, St. Louis, MO 63130

Discrimination and Harassment Response Coordinators

Chadana Ferguson, Associate Vice Chancellor, Office of Institutional Equity, 314-935-2846

chadana.ferguson@wustl.edu

Gillian Boscan, Director, Investigations and Conflict Resolution, Office of Institutional Equity, 314-935-1139

oir-investigations@wustl.edu

gillian.boscan@wustl.edu

Office: The Link in the Loop

Address: 611 N. Skinker Blvd, Suite 300, St. Louis, MO 63130

WashU Confidential Concern Reporting Portal, https://secure.ethicspoint.com/domain/media/en/

pu17543/index.html

Washington University Code of Conduct

Statement of General Principles

This code applies to the following members of the Washington University community: (a) individuals who are paid by Washington University when they are work-
ing for the University—this category includes faculty and staff; (b) consultants, vendors, and contractors when they are doing business with the University and (c) individ-
uals who perform services for the University as volun-
teers. The Code of Conduct refers to all these persons col-
lectively as “members of the University community” or “community members.”

Integrity and Ethical Conduct

Washington University is committed to the highest ethi-
 cal and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the University relies on each community mem-
ber’s ethical behavior, honesty, integrity, and good judg-
ment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for his or her actions. This Code of Conduct describes standards to guide us in our daily University activities, standards we believe are already being followed.

Compliance with Laws and University Policies

The University and each community member must trans-
act University business in compliance with all laws, regu-
lations, and University policies related to their positions and areas of responsibility. Managers and supervisors are responsible for teaching and monitoring compliance in their areas.

Procedures for Reporting Violations or Concerns

This code’s compliance effort focuses mainly on teaching members of the University community the appropriate compliance standards for the areas in which they work. Nevertheless, violations may occur. In addi-
tion, members of the University community may have concerns about situations or matters that are not reportable violations. This section describes community members’ responsibilities for reporting violations or concerns, and how these responsibilities may be carried out. Each community member is expected to report violations or concerns about violations of this Code of Conduct that come to their attention. Managers have a special duty to adhere to the standards set forth in this Code of Conduct, to report violations and to enforce the standards. Managers are encouraged to identify and prevent violations and to refer any report to the appropriate University Department or Office. If a manager believes that a violation indicates a significant likelihood of discrimination or harassment or is otherwise a serious offense, the manager is encouraged to promptly report it. Ordinarily the University will not delay internal proceedings if criminal charges are filed, but may in certain circumstances postpone them while criminal proceedings are pending.

HIIA (Health Insurance Portability Act of 1996)

HIIA, Privacy Issues

Christine Schoob – Executive Director, Chief HIIA Privacy Officer (314) 747-0865

HIIA Security Issues

Matters pertaining to the School of Medicine: (314) 747-4975

Toll Free: 866-747-4975

hsiao@wustl.edu

Matters pertaining to Danforth Campus schools or the Central Fiscal Unit: Chris Shull, Chief Information Security Officer
cshull@wustl.edu

Human Resources Issues

Dr. Mark Lowe, Vice Chancellor for Research (314) 747-0515

Human Resources/Personnel Issues: All Campuses

Scott Remis, Vice Chancellor for Human Resources

srt@wustl.edu

Rob Remis@wustl.edu

Appyle Gladney, Associate Vice Chancellor for HR (314) 747-0515

International Activities/Foreign Corrupt Practices Act

Amy Kewski, Executive Vice Chancellor for Finance & COO

(314) 935-9018

Senior Auditors

Office: The Link in the Loop

Address: 611 N. Skinker Blvd, Suite 300, St. Louis, MO 63130

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pu17543/index.html

Washington University Policies