



## PROHIBITING SEX-BASED MISCONDUCT PROCEDURE

**Board Bylaw:**  
**Policy Number: 5.1001**  
**Subject Area: Student Services**  
**Adopted: 02/27/2017**  
**Revised: 09/16/2024**

### Purpose

The College is committed to maintaining a safe and healthy educational and employment environment that is free from sex discrimination, which includes discrimination and harassment based on sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and/or gender identity or expression, as well as sexual violence, domestic violence, dating violence and stalking.

As part of this commitment, the College does not adopt or implement any policy, procedure, or practice, or take any action regarding a student, employee, or applicant for employment, that discriminates against such individuals on the basis of their current, potential, or past pregnancy or related conditions, or that treats such individuals differently on the basis of sex with regard to their current, potential, or past parental, family, or marital status, or their status as the head of household or principal wage earner in their family unit.

The purpose of these Procedures is to implement the College's Policy Prohibiting Sex Discrimination and Non-Harassment Policy (Board Policy 2.101 and Board Policy 5.55), ensure a safe and healthy educational and employment environment, and meet legal requirements in accordance with: Title IX of the Education Amendments of 1972 ("Title IX"), which prohibits discrimination on the basis of sex in the College's education programs or activities; relevant sections of the Violence Against Women Reauthorization Act ("VAWA"); Title VII of the Civil Rights Act of 1964 ("Title VII"), which prohibits discrimination on the basis of sex in employment; relevant sections of the Illinois Human Rights Act, which prohibits discrimination on the basis of sex or sexual orientation, including gender-related identity; the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), which requires timely warning to the community of certain immediate threats; the Preventing Sexual Violence in Higher Education Act; and other applicable law and local ordinances.

The College has an affirmative duty to respond promptly and effectively once it has knowledge of conduct that may reasonably constitute sex discrimination in its education program or activity. The College will promptly and equitably resolve complaints of sexual discrimination in accordance with the procedures set forth below.

### Application and Scope

The College's Policy Prohibiting Sex Discrimination and these implementing Procedures apply to everyone in the College's education programs and activities, including students, faculty and staff, applicants for admission or employment, and third parties, whenever the alleged sex discrimination occurs:

- a. On College property or any property owned or controlled by a College-recognized student organization;
- b. Off College property if:
  - 1. The conduct was in connection with a College or College-recognized program or activity; or
  - 2. The conduct may have the effect of creating or contributing to the creation of a hostile environment for a member of the College community; or
  - 3. Otherwise within the College's disciplinary authority for students or employees.

These Procedures govern sex discrimination in various forms, many of which may trigger legal obligations under one or more state and federal laws. In no case does the inapplicability of a particular legal framework require the College not to address an act of misconduct falling within the scope of these Procedures or other applicable College policies and procedures.

### Administration

Title IX Coordinator

The College has designated the Vice President of Student Services as the Title IX Coordinator. Contact information for the Title IX Coordinator is as follows:

Vice President of Student Services  
Office # 205, Administration Building  
27210 College Road  
Centralia, IL 62801  
Telephone: (618) 545-3033  
Email: [azanton@kaskaskia.edu](mailto:azanton@kaskaskia.edu)

Responsibilities of the Title IX Coordinator(s) include, but are not limited to:

- Coordinating the College's efforts to comply with its responsibilities under Title IX and 34 C.F.R. Part 106, and other applicable laws and regulations, to provide an educational and employment environment that is free from sex discrimination.
  - Ensuring that students, employees, applicants for admission and employment, and unions and professional organizations holding collective bargaining or professional agreements with the College are appropriately notified of the College's prohibition on sex discrimination.
  - Overseeing the College's response to all sex discrimination reports and complaints and identifying and addressing any patterns or systemic problems revealed by such reports or complaints.
  - Ensuring the prompt and thorough investigation of all sex discrimination complaints.
  - Offering and coordinating appropriate supportive measures and ensuring the effective implementation of any remedies.
  - Ensuring that appropriate protocols are in place for working with law enforcement and coordinating services with local victim advocacy organizations and services providers, including rape crisis centers.
  - Ensuring that adequate training is provided to students, faculty and staff on Title IX and related issues.
  - Monitoring students' participation in academic programs and extracurricular activities, including athletics, to identify and proactively address issues related to possible sex discrimination.
  - Collaborating with appropriate College officials to assess the campus climate regarding Title IX through surveys and other instruments and to analyze the data collected through such surveys and instruments.
  - Maintaining appropriate records of sex discrimination reports and complaints.
- Questions regarding these Procedures or the College's compliance with Title IX and related laws should be directed to the Title IX Coordinator. References in these Procedures to the Title IX Coordinator include any individual designee that the Title IX Coordinator may delegate to perform specific duties.

## Human Resources Department

The Human Resources Department will coordinate with the Title IX Coordinator with respect to any complaints of sex discrimination that involve a College employee as the complainant or as the respondent.

For complaints of sex-based misconduct that involve a College employee as the respondent, investigatory and disciplinary procedures required by any applicable collective bargaining agreement will apply in addition to these Procedures.

## External Agencies

Inquiries concerning the application of Title IX may be referred to the Assistant Secretary for Civil Rights at the United States Department of Education:

Office for Civil Rights, Chicago Office  
U.S. Department of Education  
Citigroup Center  
500 W. Madison Street, Suite 1475  
Chicago, IL 60661-4544  
Telephone: (312) 730-1560  
Email: [OCR.Chicago@ed.gov](mailto:OCR.Chicago@ed.gov)

Additionally, the Illinois Department of Human Rights has established a helpline for individuals to obtain information about their reporting options and referrals to other resources. The helpline is available Monday through Friday, from 8:30 a.m. to 5:00 p.m., at (877) 236-7703.

## Options for Assistance Following an Incident of Sex Discrimination

### Emergency Response

Anyone who experiences or observes an emergency situation should immediately call 911 and/or one of the phone numbers listed below:

- **Campus Safety and Security**  
(618) 545-3199
- **Main Campus -- Clinton County**  
Sheriff's Office

810 Franklin Street  
Carlyle, IL 62231  
Non-emergency 618-594-4555 / Emergency 911

- **Crisp Technology Center -- Centralia**  
Police Department City Hall,  
1st Floor 222 S. Poplar  
Centralia, IL 62801  
Non-emergency 618-533-7602 / Emergency 911
- **Nashville Education Center -- Nashville**  
Police Department  
875 S. Mill St.,  
Nashville, IL 62263  
Non-emergency 618-327-8232 / Emergency 911
- **Greenville Education Center -- Greenville**  
Police Department  
404 S. 3rd St.,  
Greenville, IL 62246  
Non-emergency 618-664-2131 / Emergency 911
- **Vandalia Education Center -- Vandalia**  
Police Department  
219 S. Fifth St.,  
Vandalia, IL 62471  
Non-emergency 618-283-2132 / Emergency 911
- **Salem Education Center--Salem**  
Police Department  
201 S. Rotan Ave.,  
Salem, IL 62881  
Non-emergency 618-548-2232 / Emergency 911
- **Trenton Education Center -- Trenton**  
Police Department  
25 West Indiana St.  
Trenton, IL 62293  
Non-emergency 618-224-9226 / Emergency 911

## Crisis Response Services

The following on- and off-campus counselors and advocates can provide an immediate confidential\* response in a crisis situation, as well as ongoing assistance and support:

- **SAFE ((Sexual Assault and Family Emergencies)**  
1-800-625-1414, 24 hours/day  
[www.safecrisiscenter.org](http://www.safecrisiscenter.org)

## National Resources

- **National Domestic Violence Hotline**  
1-800-799-7233  
[www.thehotline.org](http://www.thehotline.org)
- **National Sexual Assault Hotline**  
1-800-656-4673  
[www.rainn.org](http://www.rainn.org)  
The Illinois Department of Human Rights has established a helpline for individuals to obtain information about their reporting options and referrals to other resources. The helpline is available Monday through Friday, from 8:30 a.m. to 5:00 p.m., at (877) 236-7703.

*\*Indicates Confidential Advisors, as defined in Appendix A.*

Note: While the above-listed counselors and advocates may maintain a reporting person's confidentiality vis-à-vis the College, they may have reporting or other obligations under State law.

## Medical Services

Individuals may seek treatment for injuries, preventative treatment for sexually transmitted disease, and/or other health services by contacting one of the following health care providers:

- **Fayette County Hospital**  
650 W. Taylor St., Vandalia, IL 62471  
(618) 283-123  
*(victim transferred to Sarah Bush Lincoln Health Center after stabilization)*
- **\*Holy Family Hospital**  
200 Health Care Dr., Greenville, IL 62246  
(618) 664-1230
- **\*St. Joseph Hospital**  
9515 Holy Cross Lane, Breese, IL 62230  
(618) 526-4511
- **\*Salem Township Hospital**  
201 Ricker Dr., Salem, IL 62881  
(618) 548-3194
- **\*SSM Health St. Mary's Hospital**  
400 N. Pleasant Ave., Centralia, IL 62801  
(618) 436-8000
- **Washington County Hospital**  
705 S. Grand St., Nashville, IL 62263  
(618) 327-8236  
*(victim transferred to another hospital for care).*  
*\*Indicates health care options which provide medical forensic services (rape kits) and/or Sexual Assault Nurse Examiners at no cost, pursuant to the Sexual Assault Survivors Emergency Treatment Act (410 ILCS 70). Victims receive a voucher which provides for no charging for medical forensic services.*

Seeking medical treatment also serves to preserve physical evidence of sexual violence.

Off-campus health care providers will generally maintain confidentiality and not share information with the College unless the reporting person requests the disclosure and signs a consent or waiver form. Note, however, that while these health care providers may maintain a reporting person's confidentiality vis-à-vis the College, they may have other reporting obligations under State law.

## Making a Report of Alleged Sex-Based Misconduct

The College encourages individuals who have experienced sex discrimination to talk with someone about what happened so that they can get the support they need and so that the College can respond appropriately.

### Reporting Options and Notification Requirements

Different employees on campus have different reporting obligations when they receive information about conduct that may reasonably constitute sex discrimination. The following sections detail the various reporting options for students, employees and other individuals, along with the applicable notification requirements for each option.

### Reporting to the Title IX Coordinator

Individuals are encouraged to report alleged incidents of sex discrimination to the Title IX Coordinator directly. The College's Title IX Coordinator is:

Amy Zanton, Vice President of Student Services  
27210 College Road, Office AD 205  
Centralia, IL 62801  
Telephone: (618) 545-3033  
Email: azanton@kaskaskia.edu

### Reporting to Responsible Employees

Some College employees (referred to as "Responsible Employees") are required to notify the Title IX Coordinator when they have information about conduct that may reasonably constitute sex discrimination. This notification must include all relevant details about the alleged sex discrimination, including the date, time and specific location of the alleged incident(s) and the names of all involved individuals. To the extent possible, information shared with a Responsible Employee will be disclosed only to the Title IX Coordinator and/or those individuals responsible for handling the College's response to the report.

The following categories of employees are the College's Responsible Employees:

- Title IX Coordinators
- President's Cabinet
- Supervisors and Managerial Staff
- Faculty

- Public Safety and Security Department Staff
- Coaches
- Advisors of student clubs/organizations:

## Confidential Reporting

Individuals who wish to confidentially report an incident of sex-based misconduct may make a confidential report to the following off campus confidential resources:

### *On-Campus Confidential Resource:*

Laurie Wesselmann, LCPC  
Mental Health Counselor – Family Life Consultants  
27210 College Road, HB 137  
Centralia IL 62801  
Telephone: (618) 545-3012  
Email: [counseling@kaskaskia.edu](mailto:counseling@kaskaskia.edu)

### *Off-Campus Confidential Resource:*

\*SAFE ((Sexual Assault and Family Emergencies)  
1-800-625-1414, 24 hours/day  
[www.safecrisiscenter.org](http://www.safecrisiscenter.org)

*\*The individuals in this list are Confidential Advisors, as defined in Appendix A.*

The confidential resources listed in this section are not required to report any information about an alleged incident to the Title IX Coordinator without the reporting party's permission.

Note: While the individuals listed above may maintain an individual's confidentiality vis-à-vis the College, they may have reporting or other obligations under State law. Any College employee who suspects or receives knowledge that a minor student may be an abused or neglected child must :

1. immediately report or cause a report to be made to the Illinois Department of Children and Family Services (DCFS) on its Child Abuse Hotline; and
  2. follow directions given by DCFS concerning filing a written report within 48 hours with the nearest DCFS field office.
- Also Note: If the College determines that a person alleged to be the perpetrator of sexual discrimination poses a serious and immediate threat to the College community, College Police may be called upon to issue a timely warning to the College community. Any such warning will not include any information that identifies the person alleged to be the victim.

## Reporting to Other College Employees

While only designated Responsible Employees are required to notify the Title IX Coordinator when the Responsible Employee has information about conduct that may reasonably constitute sex discrimination, all members of the College community (including students) are encouraged to notify the Title IX Coordinator when they have information about such incidents.

An employee who is not a Responsible Employee or confidential employee and who receives information about conduct that may reasonably constitute sex discrimination is required to either:

- Notify the Title IX Coordinator; or
- Provide the reporting party with the contact information of the Title IX Coordinator and information about how to make a complaint under these Procedures.

## Electronic and/or Anonymous Reporting

The College maintains an online system for electronic reporting. The reporter may choose to provide his/her identity or may choose to report anonymously. The system will notify the user, before he/she enters information, that entering personally identifying information may serve as notice to the College for the purpose of triggering an investigation. Anonymous reports can be filed at Sex Discrimination Reporting Form. Where a reporter chooses to provide his/her identity and contact information, the College will respond to the reporter within 12 hours with a copy of the notification of rights and options described in Section VI below.

## Student Participation in Public Awareness Events

Public awareness events such as "Take Back the Night," the Clothesline Project, candlelight vigils, protests, "survivor speak outs" or other forums in which students disclose incidents are not considered notice to the College of sex discrimination, for purposes of triggering an obligation to investigate any particular incident(s). Such events may, however, inform the need for campus-wide education and prevention efforts, and the College will provide information about students' rights at these events.

## Knowingly False Reporting and Statements

A person who knowingly makes a false report of sex discrimination may be subject to disciplinary action, up to and including suspension, expulsion, or termination. The College will not discipline a party, witness, or others participating in the grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely

on the determination of whether sex discrimination occurred. The College is still permitted to address false reports and statements by initiating a disciplinary process under its Student Code of Conduct or employee policies as long as there is evidence independent of the determination whether sex discrimination occurred.

## College Response to Reports of Alleged Sex Discrimination

Upon being notified of alleged conduct that the notifying party believes reasonably may constitute sex discrimination, the Title IX Coordinator will analyze the allegation(s) to determine the appropriate method for processing the allegation(s). Where the Title IX Coordinator reasonably determines that the conduct as alleged could constitute sex discrimination, the Title IX Coordinator or designee will take appropriate action to promptly and effectively end any sex discrimination in the College's education program or activity, prevent its recurrence, and remedy its effects. Such action will include, but not be limited to, the following:

- Treat the complainant and respondent equitably.
- Offer and coordinate supportive measures, as appropriate, for the complainant (see Section VI.A below).
- If the College has initiated the grievance procedures (see Section VII) or offered an informal resolution process to the respondent (see Section VIII), offer and coordinate supportive measures, as appropriate, for the respondent.
- Notify the complainant or, if the complainant is unknown, the individual who reported the alleged conduct, of the grievance procedures and the informal resolution process, if available and appropriate, and concise written information about the complainant's rights and options pursuant to these Procedures.
- In response to a complaint, initiate the grievance procedures, or the informal resolution process if available and appropriate and requested by both parties.
- In the absence of a complaint or the withdrawal of any or all of the allegations in a complaint, and in the absence or termination of an informal resolution process, determine whether to initiate a complaint under the grievance procedures, considering the factors outlined in Section VII.A.2.
- If electing to initiate a complaint, notify the complainant prior to doing so and appropriately address reasonable concerns about the complainant's safety or the safety of others, including by providing supportive measures.

## Supportive Measures

Supportive measures (also referred to as "interim protective measures") are individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to a complainant or respondent, to: (1) restore or preserve a party's access to the College's education program or activity, including measures that are designed to protect the safety of the parties or the College's educational environment; and (2) provide support during the College's grievance procedures or during an informal resolution process.

Examples of supportive measures that the College may offer include, but are not limited to:

- Counseling and mental health support;
- Extensions of deadlines or other course-related adjustments;
- Leaves of absence;
- Changes to academic, living, dining, transportation and/or working schedules or situations;
- Increased security and monitoring of certain areas of campus;
- Issuance and enforcement of mutual campus no contact orders; and
- Enforcement of an order of protection or no contact order entered by a State civil or criminal court.
- Training and education programs related to sex discrimination

## Coordination of Supportive Measures

The Title IX Coordinator is responsible for the offering and coordination of supportive measures, as appropriate, for the complainant and/or respondent. While the particular supportive measures offered will vary depending on what the College deems reasonably available, any supportive measures offered will be designed to protect the safety of the parties or the College's educational environment, or to provide support during the grievance procedures or during the informal resolution process. Supportive measures will not unreasonably burden either party and will not be imposed for punitive or disciplinary reasons.

If the complainant or respondent is a student with a disability, the Title IX Coordinator may consult, as appropriate, with the Office of Disability Services to determine how to comply with Section 504 of the Rehabilitation Act of 1973.

At the conclusion of the grievance procedures or at the conclusion of the informal resolu