VIRGINIA MILITARY INSTITUTE
Lexington, Virginia

GENERAL ORDER)
NUMBER 52) 27 March 2013

Employee Discrimination Policy

A. Policy. The Virginia Military Institute is committed to providing all employees a work and educational environment characterized by civility and respect, and free of illegal discrimination.VMI does not discriminate on the basis of race, color, religion, sex, age, veteran status, national origin, disability, or genetic information in its programs or activities.

B. Purpose. The purpose of this policy is to establish clearly and unequivocally that VMI prohibits discrimination by individuals subject to its control or supervision and to set forth procedures by which allegations of discrimination shall be filed, investigated and adjudicated. This policy does not allow curtailment or censorship of constitutionally protected expression.

C. Applicability. This policy applies to VMI employees, faculty and staff, visitors to Post, and contractors working on Post who are not VMI employees, and faculty and staff participating in VMI-sponsored activities off-Post.

D. Definitions.

1. Discrimination: Inequitable treatment of a person based on one or more of that person's protected characteristics or statuses that violates the law.

2. Harassment: A form of discrimination whereby unwelcome conduct is directed toward an individual's protected characteristics or statuses. Harassment may include unwelcome verbal, written or physical conduct toward an individual based on a protected status, that: (1) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (2) has the purpose or effect of unreasonably interfering with an employee's work performance; or (3) affects an employee's employment opportunities or compensation.

3. Retaliation: Overt or covert acts of reprisal, interference, restraint, penalty, discrimination, intimidation, or harassment against an individual or group reporting suspected violations of this policy.

E. Reporting Contacts

Conduct in violation of this policy shall be reported promptly. All reports of discrimination shall be forwarded to the Inspector General as soon as possible after they are received.

1. VMI strongly encourages all reports of discrimination to be made through the appropriate chain of command. If that is not possible or desirable, then reports may also be made through faculty, staff and employee reporting contacts, directly to

Inspector General's staff, or to the Superintendent's Chief of Staff. To allow for effective and equitable investigation of and response to alleged violations, discrimination shall be reported as quickly as possible.

2. Reports made by Employees: Employees shall report violations of this policy to:

   a. their immediate supervisor,
   b. a faculty or staff reporting contact,
   c. the Inspector General, or a member of the Inspector General's staff,
   d. the Superintendent; his Chief of Staff; the Deputy Superintendent for Finance, Administration and Support; the Deputy Superintendent for Academics and Dean of the Faculty; the Commandant; the Director of Intercollegiate Athletics, or the Director of Information Technology.

3. Reports made by Visitors or Contractors. Visitors and employees of contractors working on Post should report violations of this policy to a member of the Inspector General's staff.

4. The VMI Inspector General and Title IX Coordinator is Colonel William R. Grace. The members of the Inspector General's staff are MAJ Jennifer deHart and MAJ Christopher Perry. Their contact information is listed below.

NAME	LOCATION	OFFICE PHONE	CELL PHONE	E-MAIL
Col William R. Grace	212 Carroll Hall	464-7072	540-462-7140	gracewr10@vmi.edu
MAJ Jennifer deHart	126 Hinty Hall	464-7658	540-784-5545	dehartje@vmi.edu
MAJ Christopher Perry	115 Third Barracks	464-7326	757-719-9902	perryco@vmi.edu

Above names updated 3 Sept 2013

5. Faculty and staff reporting contacts are in Appendix A.

F. Process

The Inspector General is responsible for the investigation and resolution of all reports of discrimination and shall determine the correct disposition of any report of behavior alleged to be in violation of this policy. Any claim of retaliation for making a report of discrimination shall be reported immediately to the Inspector General. Retaliation for such reporting is strictly forbidden and, itself, is a violation of this policy.

1. Reports may be made orally or in writing to any of the individuals identified above or in Appendix A. The persons receiving a report are under direct order not to

disclose to anyone except the Inspector General any report received or the fact that a report has been made.

2. At the reporting individual's option, the reporting contacts will accept, without comment or need for explanation, a sealed envelope addressed to the "**Inspector General.**" The envelope, at a minimum, need only contain a piece of paper with the name and room number or phone number of the individual wishing to make a report. As will be the case with all reports, however made, the reporting individual will be contacted as soon as practicable for an interview with a member of the Inspector General's staff.

3. Notwithstanding the forgoing, individuals who believe they have been the subject of conduct in violation of this policy are encouraged to make detailed written statements of the facts, including the name(s) of the offending individual(s), and any witness(es), as soon after the incident as may be possible. Any such statements may be included with the report.

4. The confidentiality of the reporting party will be observed to every extent possible without interfering with the ability to investigate or take corrective action.

5. The Inspector General, will conduct a thorough investigation of the alleged conduct and make recommendations based upon the findings.

G. Sanctions

1. In the event a determination is made that conduct in violation of this policy has, in fact, occurred, sanctions will be determined as follows:

    a. Sanctions for teaching, research, administrative and professional faculty will be determined by the Deputy Superintendent for Academics and Dean of the Faculty; Deputy Superintendent for Finance, Administration and Support; Director of Intercollegiate Athletics; Commandant; Chief of Staff or Superintendent in accordance with the applicable Faculty Handbook for the Virginia Military Institute. Possible sanctions include, but are not limited to counseling, a requirement to undertake additional training, the initiation of dismissal proceedings according to procedures in the appropriate governing regulation, or other action as appropriate.

    b. Sanctions for classified employees will be determined by the Director of Human Resources in accordance with the State's Standards of Conduct Policy. Sanctions that may be imposed by the Institute include, but are not limited to verbal counseling, additional training, and issuance of a Written Notice, suspension or termination of employment.

c. Contractors shall assign for duty only employees acceptable to the Institute. The Institute reserves the right to require the Contractor to remove from the Post any employee(s) who violate this policy.

d. Visitors who violate this policy will be directed to leave the Post immediately and may be barred from Post for a period of time or permanently.

2. In all cases, individuals who violate this policy shall be held accountable in accordance with the severity of the offense.

H. Retaliation Prohibited

1. Under this General Order, "retaliation" includes intimidation, threats, harassment, and other adverse action taken or threatened against any complainant or person cooperating in the investigation of allegations of discrimination.

2. It is a violation of VMI policy and this General Order to retaliate against any person making a complaint of discrimination or against any person cooperating in the investigation of any allegation of discrimination.

3. Retaliation shall be reported immediately to the Inspector General (540) 462-7140 and may result in disciplinary action independent of the sanctions or interim measures imposed in response to the underlying allegations of discrimination.

4. VMI shall use every effort to protect victims and other individuals who make reports of discrimination from retaliation, and VMI shall use every effort to protect the safety and anonymity of individuals that make reports of retaliation.

FOR THE SUPERINTENDENT:

Jeffrey H. Curtis
Colonel, U.S. Air Force (Retired)
Chief of Staff

DIST: E
OPR: IG

Appendix A: Faculty and Staff Reporting Contacts

Contact	Building/Office/Phone extension
LTC Neil Whitmore	Admissions/7039
LTC Dave Williams	Aux. Services (Laundry, Mess Hall, Hospital, etc.)/7095
Mr. Lance Fujiwara	Cameron Hall/7310
Mrs. Pat Troppoli	Carroll Hall/7208
CPT Daniel Jaffe	Cocke Hall/7555
SGM John Neel	Commandant/7706
SFC Buck Bryan	Kilbourne Hall/7698
MAJ Meagan Herald	Mallory Hall/7684
MAJ. Amy DeHart	Marshall Hall/7740
Ms. Tamara Stoops	Maury Brooke Hall/7417
Ms. Carole Green	Moody Hall/7221
COL Jim Squire	Nichols Engineering/7548
LTC Susan Hastings	Preston Library/7607
Ms. Katrina Butner	Protocol & Smith Hall/7104
Ms. Tracy Gordon	Physical Plant/7130
COL Mary Rose Sheldon	Scott Shipp Hall/7691
Ms. Betty Skillman	VMI Museum/7671

Above names updated 20 Sept 2013