

City of Philadelphia Economic Opportunity Plan

Drexel University/Wexford Science and Technology

I. Introduction, Definitions and Goals.

The City of Philadelphia strongly encourages the use of certified Minority ("MBE"), Women ("WBE"), Disabled ("DSBE") and Disadvantaged¹ ("DBEs") Business Enterprises (collectively, "M/W/DSBEs") and minority and female workers in various aspects of the design and construction of the development (the "Project") of the former School District of Philadelphia site by Drexel University in a joint venture with Wexford Science and Technology (the "Developer") in the area bounded by Powelton Avenue, Lancaster Avenue, 37th Street, Warren Street, 36th Street, Filbert Street and 38th Street (the "Site"). In support of this objective, the City of Philadelphia will require that the owners of the Project commit to this Economic Opportunity Plan ("EOP" or "Plan").

The Owner hereby verifies that all information submitted to the Office of Economic Opportunity ("OEO") in response to this Plan, is true and correct and take notice that the submission of false information is subject to the penalties of 18 PA C. S. Section 4904, relating to unsworn falsification to authorities and 18 PA C. S. Section 4107.2 (a)(4), relating to fraud in connection with minority business enterprises or women's business enterprises.

For the purposes of this Plan, MBE, WBE, DBE and DSBE shall refer to certified businesses so recognized by OEO. Only the work or supply effort of firms that are certified as M/W/DSBEs by an OEO approved certifying agency² will be eligible to receive credit as a Best and Good Faith Effort. In order to be counted, certified firms must successfully complete and submit to the OEO an application to be included in the OEO Registry which is a list of registered M/W/DSBEs maintained by the OEO and available online at www.phila.gov/oEO/directory.

For this Plan, the term "Best and Good Faith Efforts," the sufficiency of which shall be in the sole determination of the City, means: efforts, the scope, intensity and appropriateness of which are designed and performed to foster meaningful and representative opportunities for participation by M/W/DSBEs and an appropriately diverse workforce and to achieve the objectives herein stated. Best and Good Faith Efforts are rebuttably presumed met when

¹ Disadvantaged Business Enterprises ("DBEs") are those socially or economically disadvantaged minority and woman owned businesses certified under 49 C.F.R. Part 26.

² A list of "OEO approved certifying agencies" can be found at www.phila.gov/oEO

commitments are made within the M/W/DSBE participation ranges established for the improvements and a commitment is made to employ a diverse workforce as enumerated herein.

II. Project Scope.

The Project consists of the design and construction of certain improvements to be made at the Site. The Site will be improved, subject to various approvals necessary for the construction of the Project. Participants shall include certain design or other professional service providers and their respective consultants, the general contractor or construction manager (hereinafter referred to as the "General Contractor") retained to construct the Project (collectively, the "Participants").

III. Goals.

A. M/W/DSBE Participation Ranges.

As a benchmark for the expression of "Best and Good Faith Efforts" to provide meaningful and representative opportunities for M/W/DSBEs in the Project, the following participation ranges have been established. These participation ranges represent, in the absence of discrimination in the solicitation and selection of M/W/DSBEs, the percentage of MBE, WBE and DSBE participation that is reasonably attainable through the exercise of Best and Good Faith Efforts. These percentages relate to the good faith estimated cost of the Project. In order to maximize opportunities for as many businesses as possible, a firm that is certified in two or more categories (e.g., MBE and WBE and DSBE or WBE and DSBE) will only be credited toward one participation range as either an MBE or WBE or DSBE. The ranges are based upon an analysis of factors such as the size and scope of the improvements and the availability of MBEs, WBEs, DSBEs and DBEs to participate in the improvements:

The following contract goals have been set for the Project:

The following Professional Services contract goals have been set for the Project:

Contracts	Minority Owned	Female Owned	Disabled Owned
Professional Services	15 - 20%	5% - 15%	Best Efforts

The following Construction contract goals have been set for the Project:

Contracts	Minority Owned	Female Owned	Disabled Owned
Construction	25% - 30%	10% - 15%	Best efforts

B. Employment Goals.

The following Construction contract goals have been set for the Project:

	Local Residents	
	50%	

Drexel University in a joint venture with Wexford Science and Technology agrees to exhaust Best and Good Faith Efforts to employ minority persons and females in its workforce of apprentices and journeymen at the following levels³:

Minority Journeymen - 32% of all journey hours worked across all trades.

Female Journeypersons – 2% of all hours worked across all trades.

Minority Apprentices - 50% of all hours worked by all apprentices.

Female Apprentices - 7% of all hours worked by all apprentices.

IV. Responsiveness.

A. The Owner and relevant participants shall identify M/W/DSBE commitments and other agreements evidencing its intent to use Best and Good Faith efforts to employ minority persons and females at the levels stated herein. The identified commitments constitute a representation that the M/W/DSBE is capable of providing commercially useful goods or services relevant to the commitments and that the Owner and participants have entered into legally binding commitments or other legally binding agreements with the listed M/W/DSBEs for the work or supply effort described and the percentage amounts set forth. In calculating the percentage of M/W/DSBE participation, the standard mathematical rules apply in rounding off numbers.

B. M/W/DSBE commitments are to be memorialized in a written subcontract agreement. Letters of intent, quotations, contracts, subcontracts and any other documents evidencing commitments with M/W/DSBEs, including the M/W/DSBE Participation and Workforce Commitments Form, become part of and an exhibit to the Agreement.

C. OEO reserves the right to request further documentation and/or clarifying information at any time during the construction of the Project to ensure that Best and Good Faith Efforts have been made.

³ These goals, which have been adopted by the Economic Opportunity Cabinet, are the recommendations of the Mayor's Commission on Construction Industry Diversity.

V. Compliance and Monitoring of Best and Good Faith Efforts.

A. To the extent required by law, the Owner shall ensure that its on-site contractors maintain certified payrolls which include a breakout of hours worked by minority and female apprentices and journeypersons. These documents are subject to inspection by OEO.

B. Prompt Payment of M/W/DSBEs.

The Owner agrees and shall cause its contractors to ensure that M/W/DSBEs participating in the Project receive prompt payment for their work or supply effort within five (5) business days after receipt of a proper invoice following satisfactory performance.

C. Oversight Committee.

The Owner and the City of Philadelphia, in consultation with the appropriate agencies and entities, will establish and identify the members of a Project Oversight Committee, including representatives from the Owner, the Developer and/or the General Contractor and Construction Manager, the Office of Economic Opportunity, City Council, community organizations and the Building Trades. Participants will engage in monitoring, reporting and problem solving activities which are to include regular meetings to address all matters relevant to further development of the Plan, carrying out its implementation and the successful completion of the Project.

D. Reporting.

The Owner agrees to file an annual report with the City of Philadelphia and City Council concerning the performance of the Economic Opportunity Plan through the duration of the Project. In addition, during construction, the Owner will provide "snapshot" reports containing updates for certain categories of information contained in its annual report on a monthly basis during construction. Snapshot reporting will include: (i) utilization of M/W/DSBEs and/or DBEs, and (ii) the hiring and employment of minorities and females. All reports (quarterly & annually) provided to the City under this section will also be provided to the Office of Economic Opportunity.

VI. Remedies and Penalties for Non-Compliance.

A. The Owner agrees that its compliance with the requirements of this Plan is material to the Agreement. Failure to comply with the Plan may constitute a substantial breach of the Agreement and is subject to the remedies and penalties contained therein or otherwise available at law or in equity. Notwithstanding the foregoing, no privity of contract exists between the City and any M/W/DSBE identified in any contract resulting from implementation of the Plan. Neither the Owner nor the City intends to give or confer upon any such M/W/DSBE any legal rights or remedies in connection with subcontracted services under any law or policy or by any reason of any contract resulting from implementation of the Plan except such rights or remedies

that the M/W/DSBE may seek as a private cause of action under any legally binding contract to which it may be a party.

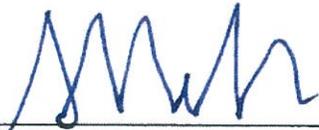
Drexel University City Development, LLC



5/30/2014

By: DUC, LLC, its managing member⁴
By: Drexel University, its sole member
By: James R. Tucker, Sr., Vice President

Date



By: Wexford University City HS, LLC, a member, LLC⁵
By: S. Nelson Weeks, Sr. Vice President

5/30/2014
Date



Angela Dowd-Burton⁶
Executive Director
City of Philadelphia
Office of Economic Opportunity

5/30/2014
Date

⁴ The Owner's Representative is required to sign and date, but the City reserves the right to obtain the Owner's Representative signature thereon at any time prior to Plan certification. The Owner Representative will receive from the City a certified copy of its Plan which should be filed with the Chief Clerk of City Council within fifteen (15) days of the issuance and published by OEO, in a downloadable format, on the OEO website.

⁵ The Owner's Representative is required to sign and date, but the City reserves the right to obtain the Owner's Representative signature thereon at any time prior to Plan certification. The Owner Representative will receive from the City a certified copy of its Plan which should be filed with the Chief Clerk of City Council within fifteen (15) days of the issuance and published by OEO, in a downloadable format, on the OEO website.

⁶ Pursuant to Section 17-1603 (2) of The Philadelphia Code, the representative of the City of Philadelphia's Office of Economic Opportunity, the "certifying agency", certifies that the contents of this Plan are in compliance with Chapter 17-1600.

EXHIBIT A

STATEMENT OF DIVERSITY PRACTICES, POLICIES AND PAST ACHIEVEMENTS

In compliance with Chapter, 17-603 entitled Equal Opportunity Plan: Contents, the Economic Opportunity Plan shall contain a statement from the contractor, developer and/or recipient of financial assistance summarizing past practices by identifying and describing examples of processes used to develop diversity at any/all levels of its organization, including, but not limited to, Board and managerial positions. This statement shall also summarize strategic business plans specific to current or past practices of M/W/DSBE utilization on government and non-government projects and procurement. Where appropriate, such a statement should contain:

1. Describe employment and recruitment policies used to achieve diversity in your workforce

Equality and Non-Discrimination Policy (OED-1)

www.drexel.edu/~media/Files/oed/PDF/EQUALITY%20AND%20NONDISCRIMINATION%20POLICY%209229.ashx

Reasonable Accommodation of Individuals with Disabilities Policy (OED-2)

<http://www.drexel.edu/~media/Files/oed/PDF/Non-Discrimination-Reasonable%20Accomodation%20of%20Individuals%20with%20Disabilities%20Policy.ashx>

Sexual Harassment and Misconduct Policy (OED-3)

<http://www.drexel.edu/~media/Files/oed/PDF/Drexel%20Title%20IX%20Policy%20Final.ashx>

2. Drexel University Board of Trustees

a. Term Members

Renee J. Amore

President & CEO, The Amore Group
King of Prussia, PA

Paul "Mel" Baiada

Partner, BaseCamp Ventures
Moorestown, NJ

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President, Stein-Bellet Foundation, Inc.
Philadelphia, PA

Gregory S. Bentley
CEO, Bentley Systems, Incorporated
Exton, PA

Carl M. Buchholz, Esquire
Partner, DLA Piper LLP
Philadelphia, PA

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Chairman & President, Buckley & Company, Inc.
Philadelphia, PA

Randall S. Burkert
Managing Director, Northern Trust
New York, NY

R. John Chapel, Jr.
President/CEO, White Hall Capital, LLC
Ashburn, VA

The Honorable Ida K. Chen
Judge, Philadelphia Court of Common Pleas
Philadelphia, PA

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President and CEO, GlenDevon Group Inc.
Haverford, PA

Abbie Dean
President, ColdWaterFlat
Haverford, PA

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Chairman, Chief Executive Officer and President, Aqua America Inc.
Bryn Mawr, PA

Richard J. DePiano
Chairman & CEO, Escalon Medical Corp.
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Falmouth, MA

Brian R. Ford
CEO, Washington Philadelphia Investors, LLP
Medford, NJ

John A. Fry
President, Drexel University
Philadelphia, PA

Sean J. Gallagher
Co-Chief Investment Officer and Portfolio Manager, Goldman, Sachs & Company
New York, NY

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Principal, RMK Associates
Wyndmoor, PA

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Chairman & President, Urban Outfitters Incorporated
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Cynthia P. Heckscher
Managing Director, Diversified Search
Philadelphia, PA

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New York, NY

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Chairman/President/CEO, The Triumph Group, Inc.
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Ocean City, NJ

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Alan C. Kessler, Esquire
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Ambler, PA

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Dresher, PA

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Potomac, MD

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E. Frederick Wheelock

Retired Professor of Pathology, MCP Hahnemann University
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Biography

**John Anderson Fry, President
Drexel University**

John Anderson Fry, appointed Drexel University's 14th president in 2010, has served higher education for his entire professional life. Through his roles as a consultant, board member, chief operating officer and chief executive, he has acquired a deep and broad understanding of the challenges of leading a major educational institution.

Fry set out to transform Drexel into what he has termed the "modern urban university of the future"—an institution that harnesses both its long-established and still-emerging strengths to serve its students, its neighborhood, its city and the nation. Under Fry's leadership, Drexel is setting a new standard for cooperative education, transforming its online and hybrid offerings, and becoming a powerful force for economic development in the Greater Philadelphia region. Fry led the University community's collaboration on a five-year strategic plan, launched in 2012, to guide the pursuit of those goals.

Fry has announced high-impact academic initiatives to increase the breadth of opportunity for students and faculty. He negotiated a groundbreaking affiliation in 2011 with the Academy of Natural Sciences of Philadelphia, America's oldest major natural history museum and a world leader in natural sciences research. Drexel launched the Close School of Entrepreneurship in 2013 to integrate entrepreneurial learning into the curriculum and support campus innovators. And Fry has signed agreements for academic and research partnerships to enhance Drexel's global connections in China, Turkey, Israel, Brazil and Chile.

Drexel's trend of growth and increased excellence in the student body has continued under Fry. For the 2013-14 academic year, total enrollment rose to 26,132, up nearly 11 percent from three years earlier, and the average GPA of the incoming undergraduate class was 3.45, with one-third in the top 10 percent of their high school class.

Fulfilling a commitment he made to Drexel's neighbors in his first address as Drexel president, Fry has championed major neighborhood initiatives including the PECO-Drexel Education Collaborative supporting local public schools, the Lindy Institute for Urban Innovation and the Dornsife Center for Neighborhood Partnerships. He also attracted corporate partners to invest in Drexel's campus development; for example, American Campus Communities is investing more than \$250 million in residential/retail projects, which will reduce the destabilizing effect of student housing on surrounding blocks, while Drexel's enhanced Employee Home Purchase Assistance Program encourages increased owner occupancy in the neighborhood.

A focal point of Drexel's strategic plan is to become an even greater economic engine for Greater Philadelphia. Fry announced the creation of Drexel Ventures, a subsidiary enterprise to help faculty and students partner with the private sector to build businesses around their inventions. And those relationships will be at the heart of Drexel's Innovation Neighborhood, a 12-acre live/work/learn development on University real estate adjacent to Philadelphia's Amtrak 30th Street Station.

Under Fry's leadership, Drexel has seen a significant increase in fundraising and a growing number of philanthropic partners. A \$400 million campaign reached its goal ahead of schedule in 2013 and brought in more than 16,000 new donors, including raising faculty and staff participation from 12 to 62 percent.

In addition to serving as president of Drexel University, Fry serves as president of the Drexel University College of Medicine and Drexel e-Learning, the University's operating company for online education.

Fry came to Drexel from Franklin & Marshall College, where he served as president from 2002 and was instrumental in the college's academic growth, campus and neighborhood development and improved finances. He raised the college's national profile and brought a renewed confidence to the institution. During his tenure, the quality of the student body improved dramatically as measured by a 63-point gain in average SATs over seven years. He also improved the student-to-faculty ratio to 10:1 by adding more than 40 faculty lines, oversaw an updated curriculum and made a long-term commitment to increase financial aid. Fry forged new partnerships with the city and neighbors, improving the surrounding business district and neighborhoods.

From 1995 to 2002, Fry served as executive vice president of the University of Pennsylvania. He was a major force in developing and implementing Penn's "Agenda for Excellence," a comprehensive plan that guided strategic initiatives from 1996 to 2001. He also built a coalition of nonprofit, business, neighborhood and governmental organizations in support of a multi-pronged strategy to address the key challenges facing the University City neighborhood in West Philadelphia. In a relatively short period of time, residential property values rose significantly, the crime rate declined dramatically and hundreds of millions of dollars were invested in commercial infrastructure and economic development.

Before joining Penn, Fry was a management consultant for the higher education and nonprofit sectors.

He worked closely with some of the nation's premier colleges and universities, first with KPMG Peat Marwick and then with Coopers & Lybrand's National Higher Education Consulting Practice, where he was elected a partner in the firm and eventually became partner-in-charge of the national practice.

In 2014, Fry began a three-year term as a member of the board of directors of the American Council on Education, representing his fellow U.S. university presidents in the nation's most influential higher education association. He also serves on the boards of Lafayette College, The Shipley School, Pennsylvania Academy of the Fine Arts, Milton Hershey School, the Greater Philadelphia Chamber of Commerce, Select Greater Philadelphia, the Ben Franklin Technology Development Authority, the Philadelphia Schools Partnership and US Squash, which recently elected him chairman. He was the founding chairman of the University City District and served in that capacity for five years. He is also a director of Community Health Systems, Delaware Investments and the Hershey Trust.

He previously served as chair of the NCAA Division III Presidents Council and on the Executive Committee of the NCAA. He was appointed by President George W. Bush to the Benjamin Franklin Tercentenary Commission, and co-chaired the transition team of Governor-Elect Edward Rendell of Pennsylvania.

A native of Brooklyn, N.Y., Fry graduated from Lafayette College and earned a master's degree in business administration from the New York University Stern School of Business.

Fry and his wife, Cara, an art historian, have three children: Mia, a recent graduate of Williams College; Nathaniel, a freshman at Drexel University; and Phoebe, a seventh grader at The Shipley School.

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Ludo Scheffer, PhD, Chair, Faculty Senate

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Eric Zillmer, PsyD, Athletic Director

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3. Identify your organization's methods of solicitation and utilization of Minority, Women and Disabled Businesses (M/W/DSBEs). Please be specific in describing outreach and any procurement policies that are focused on creating or sustaining business relationships with M/W/DSBEs.

Additional Drexel Initiatives regarding WorkForce and Outreach Efforts:

Employer-Driven-Job-Training

Working with University City District's West Philadelphia Skills Initiative, Drexel is developing employer-driven job training programs tied to its employment needs. In its first effort, Drexel and the Skills Initiative collaborated to create a pipeline for local residents to receive training, mentoring and job opportunities as Certified Medical Assistants in the College of Medicine. The 24-week program provided paid clinical and interpersonal skills training, mentoring by seasoned medical professionals, career development and job coaching services, along with job opportunities through the College of Medicine. The project attracted \$101,100 from the Philadelphia Workforce Development Corporation to provide wage subsidies for the new COM employees. Twelve Medical Assistants completed the classroom and on-the-job training and have been retained by the College of Medicine. The medical practices were so pleased with the quality of candidates that they requested a second cohort; Drexel is currently training the second cohort.

Hire-Mantua

Drexel has developed a “Hire Mantua” (HR) strategy for recruitment and retention for local residents, with a focus on local recruitment and outreach. Since the program’s inception in 2010, there has been an 11.4% increase in the percent of local employees across all employment categories (faculty, professional staff, adjunct, temp, per diem/casual) at Drexel. The percent of local professional staff at Drexel has reached a 5-year high, representing 7.3% of the total employee population. The College of Medicine has had similar success, with a 23.3% increase in the percent of employees from the area across all employment categories.

Youth-Internships

Drexel has also expanded its youth internships commitment. As a partner with the Philadelphia Youth Network (PYN), Drexel increased its participation in PYN’s summer internship program by 33% in summer 2011 and placed 23 high school interns throughout the Main and Center City Campus in the summer of 2012, an increase of 21%. Drexel will have 62 high school internships for the summer of 2013. Drexel also participated in PYN’s school-year internship program for the first time in 2011-12. Ten high school students worked on campus from November to May, building a long-term, productive relationship with the University. The interns were recruited from West Philadelphia high schools, maximizing our local impact

Construction Inclusion

A key opportunity for economic opportunity is through construction inclusion. The LeBow College of Business Economic Opportunity Plan Oversight Committee has defined diversity participation goals and reporting requirements for the new LeBow building construction project, based on best and good faith efforts, and with goals for contract and workforce diversity. The Committee reports 59,955 man-hours (out of 200,558 total man-hours for the project) or 30% local (Philadelphia) participation, since the beginning of construction to 3/31/13; Philadelphia subcontractors' contract values account for 17% of total project committed value. The Chestnut Square project reports 81,364 man-hours out of 234,378 total project for Philadelphia residents, or 35%; of the project so far; Philadelphia subcontractors' contract values account for 17% of total project committed value.

Digital-Literacy-in-Philadelphia

Drexel is a lead partner in KEYSPOt: Powered by the Freedom Rings Partnership, a \$25M federal investment in digital literacy in Philadelphia. Drexel has now overseen over 40,000 hours of training for more than 5,000 Philadelphia Housing Authority (PHA) residents on basic digital literacy skills and the deployment of a city-wide marketing and awareness campaign. Drexel has worked with PHA to develop intergenerational learning courses and has introduced digital literacy into PHA’s existing pre-apprenticeship program to enhance workforce training.

Digital-On-Ramps

Drexel has been named managing partner and fiscal intermediary for Digital On-Ramps. Digital On-Ramps (DOR) is a mobile and land-based digital network being planned to provide “anytime, anywhere” learning and workforce training for youth and adults age 14 and up, in order to prepare all Philadelphians to connect to employment and post-secondary education. Through a generous gift of \$2 million, Drexel began launching this initiative in Summer 2012. The initiative has gained national attention as a Clinton Global Initiative commitment.

4. What percentage of your company's total spend with vendors and suppliers is attributable to M/W/DBSEs?

Drexel University purchases a wide variety of goods and services and the annual amount (5/1/2013 through 4/30/2014) with M/W/DSBEs was approximately \$9,897,065.05 or 2.98% of the University's overall spend (excluding bond and benefit payments, student and patient refunds, Payroll withholding payables).

In FY13 (July 1, 2012 through June 30, 2013) the University's overall capital project spend was \$102M; of which approximately \$79M was construction projects of \$5M or more. Our Lebow project was our first reporting into the City of Philadelphia with diversity goals. In FY13 Keating reported to us a combined 2nd and 3rd tier M/W/DBSE spend \$7,972,313. Chestnut Square is another project with OEO goals owned by ACCA on Drexel property. Talson Solutions, reported to us that the M/W/DBSE for FY13 was \$15,009,716.

- a) Types of goods and services purchased through M/W/DSBEs besides construction related are Professional Services, major equipment, printing & duplication, lease/rental expense, supplies expense, facilities services expense, hospitality, communication costs, etc.
- b) While we endeavor to utilize vendor agreements and GPO contracts as much as possible, we do not have established contracts with spend requirements for any of our vendors.
- c) Many of the firms utilized by Drexel University are listed in the City's OEO Registry
- d) All of our M/W/DSBEs are self-certified; we do not require a certifying agency.
- e) N/A

Largest M/W/DSBEs vendors utilized by Drexel in the last 12 months (5/1/13 through 4/30/14):

- Telrose
- Corporate Interiors
- Bittenbender Construction LP
- Voith & MacTavish Architects
- En Pointe Tech
- Visual Sound Inc
- Eagle Capital Management LLC
- Education Management Solutions
- Workplace Environments
- T Frank McCalls
- Frontend Graphics
- Steen Outdoor Advertising
- Talson Solutions
- Diversified Search, LLC

5. Describe initiatives made by your organization to increase investment and promote equity ownership by minorities and women.

Economic Opportunity Plans for construction and development were put in place with aggressive local and diversity participation goals. In addition to our Economic Inclusion Committee and ongoing Diversity Program, we actively promote our diversity and women vendors through our partnership with MBDC. In addition, we host vendor fairs specific M/W/DBSE vendors and provide a networking opportunity for those vendors to meet our construction/development partners.

POLICY: EQUALITY AND NON-DISCRIMINATION POLICY

POLICY NUMBER: OED-1

Effective Date: July 2002

Revisions: January 2013

Responsible Officer: Senior Vice President of Student Life and Administrative Services

I. PURPOSE

Drexel University welcomes individuals from diverse backgrounds and perspectives from around the world, and believes that an inclusive and respectful environment enriches the University community and the educational and employment experience of its members. This policy states the University's expectations for institutional and individual conduct that ensures a fair and respectful environment for living, work and study that is free from discrimination, including unlawful harassment. This policy also provides a prompt, thorough, confidential and respectful process for handling and investigating complaints of illegal discrimination.

II. POLICY

The University is committed to an environment of equal opportunity in education and employment and to proactively undertake initiatives and take actions to create such an environment. In the administration of its admissions policies, educational policies, employment policies, scholarship and loan programs, and all other University administered programs and activities; the University prohibits discrimination against individuals on the basis of: race, color, national origin, religion, sex, sexual orientation, disability, age, status as a veteran or special disabled veteran, gender identity and expression, genetic information, and any other prohibited characteristic. Moreover, Drexel does not tolerate unlawful harassment of any kind. It is a violation of this Policy to retaliate against any person who makes a complaint of discrimination or testifies, assists, or participates in an investigation or proceeding related to such behavior.

III. APPLICABILITY

This Policy applies to the following members of the University Community: trustees, faculty, professional staff, students, consultants, vendors, service providers, and any other agent of the University who engages in University activities, business, or transactions.

IV. DEFINITIONS

Complainant: an individual making a complaint.

Respondent: an individual against whom a complaint is made.

Unlawful Harassment: unwelcome physical or verbal conduct based upon race, color, national origin, religion, sex, sexual orientation, disability, age, status as a veteran or special disabled veteran, or gender identity and expression, that is sufficiently severe, pervasive, and objectively offensive as to substantially disrupt or undermine a person's ability to participate in or to receive the benefits, services, or opportunities of the University. There are two types of harassment: quid pro quo (Latin term meaning "this for that.") and hostile environment. Both types are prohibited.

Sexual Harassment: unwelcome physical or verbal conduct of a sexual nature that can include sexual advances, requests for sexual favors, and offensive sexual behavior or comments.

Quid Pro Quo Harassment: occurs when an individual explicitly, or implicitly, promises or withholds job-related or education-related benefits based upon the employee's or student's acquiescence to sexual advances or behavior. Such harassment may involve behavior by a person of either gender against a person of the same or opposite gender. Examples of behaviors that may constitute quid pro quo harassment include: seeking sexual favors or relationships in return for the promise of a favorable grade or other academic opportunity; basing an employment-related action (e.g., hiring, salary increase, promotion, termination) on a sexual favor or relationship making direct or implied threats that submission to sexual advances will be a condition of employment, work status, compensation, promotion, grades, or letters of recommendation.

Hostile Environment Harassment: verbal or physical conduct based on race, color, national origin, religion, sex, sexual orientation, disability, age, status as a veteran or disabled veteran, gender identity or expression, or retaliation, that is severe or pervasive enough to create an intimidating, threatening, or abusive environment. Examples of behaviors that may constitute hostile environment harassment include, but are not limited to: intimidating or hostile acts epithets slurs unwelcome touching or hugging denigrating jokes display or circulation of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

V. PROCEDURES

A. Reporting Obligations

All members of the University community should report incidents of discrimination or harassment to the Office of Equality & Diversity ("OED"), (215) 895-1405. Reports may also be made through the University's confidential Whistleblower Hotline at 866-358-1010 (toll free) or through the following website:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=14030.

All officers, deans, department heads, faculty members, academic advisors, directors, and supervisors must report any and all incidents of discrimination and harassment to the OED whether they have knowledge of or have witnessed directly such discrimination or harassment. These individuals must refer the complainant to OED and then report to OED that a referral has been made. All individuals who believe they have been discriminated against or harassed should file a written complaint with the OED.

B. Complaints

1. Filing a Complaint

Before filing a complaint, individuals are encouraged to utilize one or more of the methods set forth under Managing Complaints of Discrimination or Harassment, Informal Resolutions (see below) to attempt to resolve allegations of discrimination or harassment. If a party chooses to file a complaint, the complaint must be in writing, signed by the complainant, and filed with the

OED within 30 days of the alleged discrimination or harassment. On the complaint form, the complainant can provide names of witnesses and identify any evidence to support the complaint. The Complaint of Discrimination or Harassment form can be found on the OED website (www.drexel.edu/oed) or in the Office of Equality & Diversity (located at the Intercultural Center, 30 South 33rd Street, Philadelphia, PA 19104).

2. Managing Complaints of Discrimination or Harassment

Complaints of discrimination or harassment may be resolved through either the informal or formal processes described below. In cases in which the matter clearly falls outside the purview of this Equality and Non-Discrimination Policy, OED shall make the appropriate referrals. Although none of the actions set forth below are required before an individual may file a complaint, the University encourages use of these methods for informal resolutions of allegations of discrimination or harassment. This list is not exhaustive.

A. Informal Resolutions

The OED may manage the complaint informally, with the agreement of the complainant, through the use of any of the methods detailed below. Should the following informal methods fail to resolve the matter satisfactorily, a complaint may be filed as outlined below under "Formal Process – Complaint Investigation."

1. **One-On-One Meeting.** The complaining party, either alone or with another person, may choose to meet with the individual whose behavior is offensive, discuss the situation, and make it clear that the behavior is unwanted and must cease.
2. **Intervention by Supervisor.** The complaining party may contact an individual with supervisory authority and request assistance to stop the behavior.
3. **Facilitated Conversation or Mediation.** A complainant may contact the OED and request the assistance of a facilitator or mediator to attempt to reach a resolution.

Achievement of Resolution

The informal resolution process outlined above shall extend no longer than 45 business days after the allegation is made. Resolution of the complaint is the expected outcome of the informal process. Resolution may include, but is not limited to:

1. an agreement to terminate and not repeat specific conduct;
2. an apology and/or participation in education, training, or counseling,
3. withdrawal of the allegation without the right to reassert it.

Where appropriate, the OED shall review resolutions, including any Performance Improvement Plan, to ensure that the parties fully understand the terms. Resolution need not imply an admission of culpability. All resolutions must be agreed to and signed by both parties. Resolutions are binding and a formal complaint may not be filed later on the same set of

circumstances. However, any conduct admitted by the respondent as part of the resolution may be considered in any future discrimination or harassment investigation. Any breach of the terms of an informal resolution agreement may result in disciplinary action or a further claim of discrimination or harassment.

B. Formal Process – Complaint Investigation

If the informal process for resolution of a complaint of discrimination or harassment is not successful or, in the discretion of the OED is not warranted, the OED shall conduct a prompt, fair, and thorough investigation of the allegations in the complaint. In some cases, the alleged conduct specified in the complaint may be such that to protect the complainant or other members of the University community, the University may, in its discretion, promptly elect to place the alleged offender on administrative leave with or without pay, may implement a temporary reassignment, or may implement other interim remedial measures. These interim remedial measures will generally remain in effect for the duration of the complaint investigation process. All University students, faculty, and professional staff will be required to cooperate fully with the OED in the investigation and resolution of complaints under this Policy.

1) Determinations

The outcome of the investigation may be a finding that the allegations are unwarranted or could not be substantiated; a negotiated settlement; or a finding that the allegations have been substantiated. If the allegations have been substantiated, recommendations for disciplinary or other action will be forwarded to the appropriate University officials. The University will take all necessary steps to prevent the recurrence of any discrimination or harassment and will correct its discriminatory effects on the complainant and others, if appropriate. The standard of proof for administrative proceedings is that of a "preponderance of evidence" - that is, evidence which, as a whole, shows that the fact sought to be proved is more probable than not.

Within 60 days of the filing of a complaint or from the date of the decision to pursue the formal process for resolution of a complaint, the Associate Vice President of Equality & Diversity will communicate the final disposition of the complaint to the Complainant, the Respondent and the appropriate University officials. (Depending on the complexity of the matter, the investigation may not be able to be completed within 60 days of the filing of the complaint but will be completed within a reasonable period of time.) The responsibility for imposing disciplinary action will rest with the senior University official with management responsibility for the Respondent or with Student Conduct and Community Standards if the Respondent is a student.

2) Appealing a Determination

Either the Complainant or Respondent may file an appeal of any decision concerning the resolution of the complaint. An appeal by either party must be made, in writing, to the Senior Vice President of Student Life and Administrative Services within 10 days of receipt of the notice of the resolution or disciplinary decision. The written appeal must state, in detail, the reason(s) for the appeal and shall address one or more of the following:

a) If the appeal alleges that the findings of the Investigator included relevant factual errors or omitted relevant facts, the appeal shall specify each factual error and/or details of each relevant fact that was omitted from the investigation.

b) If the appeal alleges substantive procedural errors, the person appealing shall identify each instance of said substantive procedural error.

c) If the appeal alleges relevant or substantive issues or questions concerning interpretation of University policy, the person appealing shall state, in detail, the issues or questions supporting this allegation.

d) If the appeal alleges that new information or evidence exists, the appeal shall specify the reason why this information was not available or not provided to the Investigator during the course of the investigation, including the reason why the information could not have been provided on a timely basis.

e) If the appeal alleges either that action or inaction of the supervisor in response to the findings of the investigation will not prevent future violations of this Policy, the person appealing will specify, in detail, the reason(s) and basis for this allegation. The Senior Vice President of Student Life and Administrative Services shall review the appeal and issue a decision within thirty (30) days of receipt. This decision is final and no further internal appeals are available with the University. No disciplinary or other action based upon the original complaint findings shall be taken against the alleged offender during the appeals process, although temporary, interim measures may remain in place as provided in this Policy.

C. Retaliation

Any employee, faculty member or student who retaliates against an individual who complains of, witnesses, or participates in an investigation or resolution of a complaint of discrimination or harassment violates University policy and will be subject to disciplinary action, up to and including termination or dismissal. Complaints of retaliation should be reported as violations of this Policy.

D. Confidentiality

Although the University is committed to respecting the confidentiality and privacy of all parties involved in the reporting and resolution of discrimination and harassment complaints, it cannot guarantee complete confidentiality. Examples of situations in which confidentiality cannot be maintained include: when the University is required by law to disclose information (such as in response to legal process), when disclosure of information is determined by OED to be necessary for conducting an effective investigation of the claim, and when confidentiality concerns are outweighed by the University's interest in protecting the safety and rights of others and its duty to investigate.

RELATED POLICIES OED-2 Reasonable Accommodation of Individuals with Disabilities

POLICY: REASONABLE ACCOMMODATION OF INDIVIDUALS WITH DISABILITIES POLICY NUMBER: OED-2 Effective Date: July 2002 Revisions: October 2011 Responsible Officer: Senior Vice President of Student Life and Administrative Services

I. PURPOSE

Drexel University is committed to providing reasonable accommodations to qualified individuals with disabilities in order to provide to them equal educational and employment access and opportunity, including an equal opportunity to compete in the hiring process, to successfully perform during the course of their education or employment, and to participate fully in all programs and activities.

II. POLICY

Drexel provides reasonable accommodations to students, employees, and applicants who document their disability with the Office of Disability Resources.

III. ELIGIBILITY

Qualified individuals with disabilities who are applicants, employees and/or students may be eligible for reasonable accommodations.

Campus guests who have a disability and need an accommodation should contact the Office of Disability Resources.

IV. DEFINITIONS

Disability is any physical or mental impairment that substantially limits one or more major life activities.

Qualified Individual with a Disability is an individual with a disability, who is capable of performing the essential functions of a particular job or of participating in a particular course of study, with or without reasonable accommodations for his/her disability.

Qualified Student with a Disability is a student with a disability who meets the academic and technical standards required for admission or participation in the University's educational program or activity.

Reasonable Accommodation is any modification or adjustment that “levels the playing field” and enables a qualified student, applicant, or employee with a disability to enjoy equal educational or employment opportunities and participate fully in all programs and activities. A modification or adjustment is not reasonable if it imposes an undue burden on the University or fundamentally alters an educational program. Essential Functions means the fundamental job duties of the position the individual with a disability holds or desires. The term “essential functions” does not include the marginal functions of the

position. A job function may be considered essential for any of several reasons, including, but not limited to the following:

- a) the position exists to perform the function;
- b) there are a limited number of employees available who could perform the function; and/or
- c) the function is highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.

V. PROCEDURES

STUDENTS - REQUESTING ACADEMIC ACCOMMODATIONS

The following steps must be completed to receive an accommodation:

Eligibility

1. Complete a Request for Accommodation form which can be found on the ODR website at http://www.drexel.edu/ODR/student_reg.html.
2. Submit medical documentation: See <http://www.drexel.edu/odr/documentation.html>
3. Meet with an ODR staff member to determine reasonable accommodations.

Activation

4. Once a Request for Accommodations has been made and the accommodations are approved, ODR will provide the student with an accommodation verification letter (AVL) confirming that the student is registered with ODR and listing the accommodations to which the student is entitled for the term. * A student AVL is valid for one term.

5. To activate the accommodations, the student must provide his/her AVL to the faculty member or University administrator from whom the student is seeking accommodation.

Renewal or Modification of Accommodations

6. To renew or modify an AVL, the student must contact ODR and confirm their ongoing need for the listed accommodations or meet with an ODR staff member to determine appropriate and reasonable modifications.

EMPLOYEES - REQUESTING EMPLOYMENT ACCOMMODATIONS

The following steps must be completed to receive an accommodation:

Eligibility

1. Complete a Request for Accommodation form which can be found on the ODR website at http://www.drexel.edu/odr/student_reg.html.
2. Submit medical documentation: See <http://www.drexel.edu/odr/documentation.html>
3. Meet with an ODR staff member to determine reasonable accommodations.
Activation
4. Once a Request for Accommodations has been made and the accommodations are approved, ODR will provide the employee with an accommodation verification letter (AVL) confirming that the employee is registered with ODR and listing the accommodations to which the employee is entitled.
5. The employee AVL is activated upon issuance by the ODR and receipt by the employee's supervisor.

Modification of Accommodations

6. To modify an AVL, the employee must contact ODR to discuss appropriate and reasonable modifications.

APPLICANTS AND CAMPUS GUESTS

The following steps must be completed for a one-time accommodation to be put in place:

1. Complete a Campus Events Accommodation Request Form, which can be found on the ODR website at <http://www.drexel.edu/odr/forms/eventform.pdf>
2. Meet with an ODR staff member to determine reasonable accommodations.
3. Once reasonable accommodations have been determined, ODR will arrange for the activation of the agreed upon accommodations.

VI. RESPONSIBILITIES OF ADMINISTRATORS, ADVISERS, MANAGERS, SUPERVISORS, AND FACULTY MEMBERS

To ensure that all qualified individuals with disabilities receive the information and resources they need, all officers, deans, department heads, faculty members, academic advisors, directors, and supervisors must refer any individual who makes a request for an accommodation to the Office of Disability Resources.

VII. APPEAL OF ODR DETERMINATION

Students

If there is a dispute as to whether an individual has a disability or whether the documentation provided is adequate, if ODS and the student with a disability cannot agree on a reasonable accommodation, or if ODR denies an accommodation, the student may appeal the decision in writing to the Director of Disability Resources within thirty (30) days of the date of the decision. The Director of Disability Resources will make a determination and notify the student of the determination in writing within 10 business days of the receipt of the appeal.

Employees

If there is a dispute as to whether an employee has a disability or whether the documentation provided is adequate, if ODR and the employee with a disability cannot agree on a reasonable accommodation, or if ODR denies an accommodation, the employee may appeal the decision in writing to the Associate Vice President of Equality & Diversity within thirty (30) days of the date of the decision. The Associate Vice President of Equality & Diversity will make a determination and notify the employee of the determination in writing within 10 business days of the receipt of the appeal.

RELATED POLICIES

OED-1 Equality and Non-Discrimination Policy

POLICY: SEXUAL HARRASSMENT AND MISCONDUCT POLICY: OED-3
Effective Date: September 2013
Responsible Officer: Senior Vice President of Student Life and Administrative Services

Full policy available online at the following link:

<http://www.drexel.edu/~media/Files/oed/PDF/Drexel%20Title%20IX%20Policy%20Final.ashx>