



STUDENT HANDBOOK 2026-2027

*Policies, Procedures, and Information for Students
of The Institute for Clinical Social Work*

Institute for Clinical Social Work

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The Institute for Clinical Social Work Student Handbook sets forth expectations, procedures, processes and responsibilities relevant to students of the Institute for Clinical Social Work (ICSW); it is not to be regarded as a contract between any student and ICSW. ICSW expressly reserves the right to make changes to its written policies, rules, and regulations at any time, with or without prior notice. Please visit icsw.edu/studenthandbook for the most up-to-date version of this Student Handbook.

Our Mission

The Institute for Clinical Social Work (ICSW) exists to advance the practice and understanding of clinical social work and counseling through rigorous graduate education rooted in contemporary psychodynamic and psychoanalytic thought.

We are committed to developing skilled, reflective clinicians, scholars, and researchers who are equipped to meet the psychological needs of individuals, families, and communities within an ever-changing and complex social landscape.

Our Vision

To be the leading institution in psychodynamic clinical education, fostering a deep understanding of psychoanalytic frameworks and their application in contemporary practice. We aim to cultivate a community of professionals who are committed to lifelong learning, critical thinking, and the advancement of psychodynamic knowledge.

Values Statement

Excellence in Education:

We provide comprehensive training in the practical skills of doing psychotherapy from a psychoanalytic/ psychodynamic perspective

Fairness and Justice:

We teach critical social theories that enable our graduates to work effectively with diverse communities within a modern context.

Innovation and Leadership:

We strive to produce practitioners, scholars, researchers, educators, and leaders who are at the forefront of psychodynamic clinical social work and counseling.

Contemporary Approach:

We emphasize teaching psychodynamic concepts from a contemporary perspective, ensuring our graduates are well-equipped to meet the challenges of today's world.

Belonging and Access

The Institute for Clinical Social Work is an Affirmative Action/Equal Opportunity Employer. The Institution does not discriminate in access to its educational programs and activities, or with respect to hiring or the terms and conditions of employment, on the basis of race, color, national origin, religion, sex, gender identity and expression, political affiliation, age, disability, veteran status, genetic information or sexual orientation.

Letter from the President

Dear Students,

Welcome to the Institute for Clinical Social Work (ICSW). It is both an honor and a joy to greet you as you begin or continue your journey with us. Whether you are new to ICSW or returning, you are now part of a community rooted in deep clinical tradition, critical thinking, and a profound commitment to social justice. Your decision to study here reflects a dedication to not only developing your clinical skills, but also contributing meaningfully to the well-being of individuals, families, and communities.

At ICSW, we are proud to offer a unique and rigorous educational experience that integrates psychodynamic theory, relational practice, and critical inquiry. Our curriculum is designed to challenge and inspire you, encouraging both personal and professional growth. You will engage with faculty who are not only experienced clinicians and scholars, but also passionate educators dedicated to mentoring and supporting you throughout your academic and clinical development. Your coursework, research, and clinical training will be interwoven in ways that strengthen your voice as a reflective practitioner and an ethical leader in the field.

This Student Handbook is a key resource to help you navigate your time here. Within its pages, you'll find important information about academic policies, program requirements, institutional resources, and the values that guide our learning community. I encourage you to refer to it often and to reach out to faculty and staff with questions or concerns. We are here to support you not just academically, but as whole persons engaged in a meaningful and, at times, challenging endeavor.

The work we do at ICSW is deeply relational and transformational. As you move through your studies, I urge you to stay open to complexity, to growth, to vulnerability, and to the evolving nature of clinical work itself. Your presence here matters. Your voice, your experiences, and your insights contribute to the richness of our community and to the continued relevance and integrity of our shared mission.

Thank you for choosing ICSW as your academic and professional home. On behalf of the faculty, staff, and administration, I welcome you and wish you well on your journey of discovery, connection, and profound learning.

Warm regards,



Mika Ramírez, Ph.D. LCSW, PEL, President, Institute for Clinical Social Work



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Section 1: Academic Policies and Procedures

Academic Advising and Support

Several components of the program are organized to provide advisory resources to students as they progress through the program. The central advisory resources include the student's advisor and the Provost and Dean of Academic Affairs.

Advisor: PhD

A faculty advisor is assigned to all students at the point of matriculation. This person will serve as the central academic advisor for each doctoral student and is available to the student throughout the program until the point at which the student is assigned an approved dissertation Chair. The advisor is assigned jointly by the Chair of the Clinical Practicum and the Assistant Dean of Academic Affairs, who are also responsible for making any changes in advisor.

Advisor responsibilities include:

1. Providing consultation for Clinical Practicum I and II.
2. While serving as the student's consultant, using at least one consultation meeting with the student advisee each semester to discuss upcoming capstone requirements, reminding the student about consultation documentation submission, answering programmatic questions, etc. Continuing to meet with the student advisee once per semester throughout the program, until the student has an approved dissertation chair. Staying abreast of the most current academic and practicum policies.
3. Serving as the point person for academic, practicum or research concerns on the part of the student as well as faculty or administration. If a class instructor, or consultant, has a concern about a student, the advisor may be the first point of contact about that concern.
4. Serving as a support person for the student in cases where the student encounters problems in progression. The advisor, as such, is expected to attend meetings at which the student's progression is being evaluated.

Advisor: MA

A faculty advisor is assigned to all students at the point of matriculation. This person will serve as the central academic advisor for each master's student and is available to the student throughout the program. The advisor is assigned jointly by the Chair of the Clinical Practicum and the Assistant Dean of Academic Affairs, who are also responsible for making any changes in advisor.

Advisor responsibilities include:

1. Providing consultation for Clinical Consultations 1-4.
2. Using at least one consultation meeting with the student advisee each semester throughout the program to discuss upcoming capstone requirements, reminding the student about field placement and consultation documentation submission, answering programmatic questions, etc.

3. Staying abreast of the most current academic and practicum policies.
4. Serving as the point person for academic, practicum or field placement concerns on the part of the student as well as faculty or administration. If a class instructor, or consultant, has a concern about a student, the advisor may be the first point of contact about that concern.
5. Serving as a support person for the student in cases where the student encounters problems in progression. The advisor, as such, is expected to attend meetings at which the student's progression is being evaluated.

Academic Standards

ICSW's academic standards reflect respect for students' integrity while also clarifying the expectations and standards for academic training at the masters and doctoral level. Achieving this level of training may stretch a student's capacities and when a student experiences any academic challenges, they are encouraged to engage with their advisor, other faculty, and other relevant campus resources. ICSW's goal as an educational institution is to help mentor student learning and create an environment for student success. When challenges occur, several resources are in place to help.

Academic Standing

Academic standing applies to all degree-seeking students at ICSW. Students are in academic good standing by maintaining a grade point average of 3.0 or above, and by not receiving any failing grade. If a student is experiencing difficulty retaining this level of academic standing, they are encouraged to speak with their advisor and any other resources within the school to engage supports that may be helpful and/or necessary. If a student is unable to maintain academic good standing, they will be placed on academic probation and will work with their academic advisor about how to best provide support for them.

Academic Probation

A student is automatically placed on academic probation if:

- a. Their cumulative grade point average falls below 3.0 (This includes the cumulative grade point average in the final semester of enrollment before anticipated graduation. The student must return to good academic standing before they are eligible for graduation).
- b. They receive a failing grade (students will be required to retake the course in which they received the failing grade.)
- c. They are an advanced PhD student who attends fewer than two sessions of Advanced Research Seminar in a semester.

To support students' academic progress, their academic standing is reviewed each semester to

ensure they are managing ICSW's academic expectations. This evaluation is conducted by the Associate Registrar.

Academic Dismissal

There may be times that despite a student's best efforts and their use of ICSW's supports, the student is not able to maintain the academic standards that are required for the ICSW program degrees. The following are potential grounds for academic dismissal:

- a. The student on Academic Probation fails to meet the conditions after two academic semesters of being placed on probation for not improving their GPA to above 3.0
- b. The student on Academic Probation fails the same course for a second time
- c. The student in the PhD program does not pass the case presentation after two attempts or does not pass the Qualifying Theory exam after two attempts
- d. The student in the Master's program does not pass the case presentation after two attempts or does not pass the comprehensive exam after two attempts

Note: Academic Dismissal will be notated on a student's official transcript.

Academic Concerns

If a faculty member (in the role of advisor, instructor, consultant, dissertation chair, or dissertation committee member) has a concern about a student's academic and/or clinical performance, the faculty member should attempt to address the concern directly with the student, as part of the learning and educational process. Concerns may include issues of decreased attendance or frequent late attendance, dropping grades or consistently poor grades, difficulty either in understanding or communicating clinical or academic material, etc. The faculty member is also encouraged to inform the student's academic advisor to help to ensure the student's support network is engaged with the process and that the student has the support they need.

There may be times that the situation cannot be resolved directly between the faculty and student. If this is the case, the student and their assigned advisor should discuss the situation and determine next steps. This may include a meeting with the student, assigned advisor, faculty member, Dean of Students, Assistant Dean of Academic Affairs, and/or a Progression Referral.

ICSW Progression Committee and Policy

The Progression Committee oversees student academic and clinical performance concerns and supports students through structured interventions, as necessary. Progression may also be involved in issues related to student professionalism. The goal of the Progression Committee is to be a helpful resource that works collaboratively and flexibly with students to develop plans that best address their individual needs and support their ongoing learning, while holding to the standards set by ICSW.

Progression Committee Composition

Members may include:

- Chair of Progression
- Dean of Students
- Assistant Dean of Academic Affairs
- Faculty representatives, ideally from all programs and sequences

Progression Process

1. Identification and Referral

Student progression concerns may arise from instructors, advisors, consultants, Sequence Chairs, administration, or semester-end reviews. Concerns may include course failure, consultation delays, capstone or practicum failure or lack of adequate progression, ethical or academic integrity violations, unprofessional behavior or clinical unsuitability. The Progression Committee may be engaged with these concerns regardless of whether any of the concerns might also involve the Student Academic and Professional Integrity Process.

Faculty/staff formally submit a progression referral using the Progression Referral Form. This form is received by the Assistant Dean of Academic Affairs and is passed along to the Progression Chair, and/or the Provost and Dean of Academic Affairs.

The Registrar makes an automatic referral to progression when a student is placed on academic probation. A student is placed on academic probation when:

- Their cumulative grade point average falls below 3.0 (This includes the cumulative grade point average in the final semester of enrollment before anticipated graduation. The student must return to good academic standing before they are eligible for graduation).
- They receive a failing grade (students are required to retake the course in which they received the failing grade and are responsible for applicable tuition).

When a progression referral is received, the Progression Chair reviews the referral and any related student records/materials that were provided (the Chair may also request additional materials), and may consult with relevant parties for their input and feedback (e.g., advisor, instructors, consultants, Sequence Chair, Assistant Dean of Academic Affairs, etc.). The Progression Chair determines whether and how to initiate a remediation plan or call a meeting of the full Progression Committee to discuss how to best address the concern, including whether a formal Progression Hearing is needed. A student may also request a Progression Hearing. The Progression Chair informs the Assistant Dean of Academic Affairs of the plan.

2. Remediation Planning

Remediation planning may involve:

- A member of Progression meets with the student and/or relevant parties to discuss

concerns.

- A written remediation plan is developed by the Progression Chair, in consultation with the committee, as needed, which may outline required steps to remediation, timelines and monitoring procedures, and responsible parties. The plan is based on their review of student records/materials, discussion with the student and any consultation with other relevant parties (e.g., student advisor, clinical consultant, Sequence Chair, etc.), if needed. This plan is emailed to the student as their official notification of their progression remediation plan.
- The student's advisor, Sequence Chair (if applicable), and the Assistant Dean of Academic Affairs are notified of the remediation plan.
- Failure to comply with the remediation plan may lead to a Progression Hearing and/or further intervention. This may include the student providing progress updates to the Progression Chair regularly, if outlined in their remediation plan.
 - Remediation plans may be revised, as needed.
 - Once the remediation plan is complete, the student is removed from Progression status.
 - If progression concerns persist after remediation attempts, this may lead to a Progression Hearing.

3. Progression Hearing

If progression concerns persist/remediation is not improving the issue, or if the progression concerns are severe:

- The student is notified that a Progression Hearing will be conducted at least 10 business days in advance of the Hearing.
 - Notification includes:
 - o Date, time, and location of the Progression Hearing
 - o Summary of concerns
 - o List of attendees
 - o Option to bring a non-legal support person of their choice. The name of the person and relationship to the student must be provided in writing ahead of the hearing to the Progression Chair. The support person will not have a speaking role in the Progression Hearing and serve as a personal support for the student only.
 - o Encouragement to submit a written response and documentation (due ~5 business days prior to Hearing)

4. Hearing Format:

- Progression Chair presents the case and materials, including any prior remediation efforts.
- Student may make a statement regarding their response to the situation.

- Committee members may ask questions and seek clarification of concerns.
- Student and non-committee attendees are excused before committee deliberation.
- The Progression Committee assesses any initial remediation efforts put in place, the student's performance on any prior remediation plans, and discusses any measures that may aid the student's success in the future. The Progression Committee/Chair may consult with other relevant parties (e.g., advisor, clinical consultant, Sequence Chair, etc.), as needed to develop a plan.

5. Hearing Outcomes

Hearing outcomes may include:

- A new or revised remediation plan is developed by the Progression Committee that includes specific steps to remediation, a timeline for completion, and follow-up requirements. The plan is shared with the student, advisor, Sequence Chair (if applicable), and the Assistant Dean of Academic Affairs.
- Suspension or Dismissal from the Program.

The Progression Chair composes a hearing outcome letter which includes the committee's decision. The Assistant Dean of Academic Affairs reviews the decision put forth by the Progression Chair and approves, denies, or requests clarification of a final decision. Once a decision is finalized, the student is notified in writing.

In the event the recommendation is for dismissal, final approval of this decision goes to the Provost of ICSW.

6. Appeal Process

Students may submit an appeal of the Committee's decision if they believe that:

- The Progression process was not followed.
- The Progression process was biased or unfair.
- The Progression decision was based on factual errors.

To appeal a Progression decision, the student needs to submit a written request. Progression Chair within 10 days of receiving their outcome, clarifying the reason(s) for an appeal and requesting this decision be re-evaluated.

Appeal Deadlines:

- Within 10 business days of receipt of the Committee's decision.
- When there is an appeal, the Provost and Dean of Academic Affairs reviews the decision put forth by the Progression Committee and evaluates the student's situation and the reason for the appeal, as presented by the student. The Provost and Dean of Academic Affairs may consult with the Progression Chair, Committee, Assistant Dean of Academic Affairs and/or the student, before issuing a final decision

Artificial Intelligence Policy

This policy applies to ALL academic and academic related work done at ICSW including coursework, capstones, scholarship and fellowship applications.

The use of Artificial Intelligence (AI) in support of one's learning and writing is a dynamic issue that is continually reviewed as this technology evolves. Decisions about how AI can or will be incorporated into classwork are determined by each instructor (upon approval by the Course Sequence Chair and/or Provost and Dean of Academic Affairs).

Students should refer to their individual course syllabi for specific AI guidelines for each class. While AI is potentially a powerful tool, faculty and students need to critically examine its limitations, including the potential for bias and misinformation, as well the need for accountability to ICSW's standards of scholarship, ethical and academic integrity. Ultimately, human input and feedback are crucial elements of one's academic work. While AI may serve to assist, it should not be a replacement for original thoughts, critical analysis and writing. Transparency of AI use, responsible usage, and maintaining academic integrity are expected.

General ICSW guidelines for the acceptable use of artificial intelligence include, but are not limited to: brainstorming, translation, outline generation/organization of thoughts, writing feedback, studying, grammar checks and editing, etc.

Impermissible uses include, but are not limited to: drafting entire assignments, taking exams, copying AI generated original text, uploading sensitive data, etc.

Students are expected to cite all use of AI, including naming the AI tool used (e.g., Copilot, ChatGPT, Gemini, Claude, etc.), listing the prompt(s) used, and indicating where and how AI use influenced their work. Students must be able to defend and explain any AI-assisted work. Faculty may request evidence of process (e.g., drafts, logs) to confirm authentic student work. For Dissertations, students should follow their Dissertation Chair's guidelines, as there may be opportunities to use AI to assist with specific aspects of their research (e.g., hypothesis or research question development, refinement of literature review, survey design, transcription, statistical analysis, review and revision of data codes and themes, Defense preparation, etc.)

- Students' work may be reviewed for originality/authenticity using the plagiarism/AI detection system TurnItIn and/or other systems.
- Unauthorized and/or undisclosed AI use is considered academic dishonesty and will be treated under existing integrity violations. AI detectors may support but not replace faculty judgment when issues of improper AI use arise. Faculty may ask students to provide supporting materials for how AI was used in or influenced their work, if they suspect unauthorized or un-cited use of AI in their work. Students may also be asked to re-write assignments or portions thereof and/or orally present their assignments, if improper AI use is suspected.

When students use AI, they are asked to please let faculty know how they are using it so ICSW can continue to understand and refine the use of this new technology for the benefit of student learning and course instruction.

Admissions Policy

Admissions Procedures

The Vice President of Enrollment and Marketing serves as the chair of the Admissions Committee, which includes the Provost and Dean of Academic Affairs and Enrollment Specialist (non-voting members), and faculty members who review applications and makes admission decisions. The Provost and Dean of Academic Affairs has the authority to veto an admissions decision. Currently, the Institute for Clinical Social Work has rolling admissions. Applicants are notified of their admissions status shortly after the final phase of the application process.

False Information

Any applicant to the Institute for Clinical Social Work's academic degree programs or a student in the program who fraudulently, or through misrepresentation, makes false statements on his or her application for admission, or falsifies their degrees or professional credentials shall be subject to dismissal from the program.

Notice of Non-Discrimination

The Institute for Clinical Social Work does not discriminate based on sex in its educational programs or services or in the context of employment or admissions. Sexual misconduct, including sexual harassment as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides that:

Minimum Admission Requirements – PhD in Clinical Social Work

For consideration for the PhD program (onsite and distance) include:

- A master's degree from an accredited graduate school of social work, counseling psychology, or a master's degree in a closely related field.
- Graduate program grade point average of 3.0 on a 4.0 scale.
- Personal therapy experience is not required as a prerequisite for admission, though such experience is favorably considered.
- At least baseline licensure in the State where you practice (i.e., LSW, LCP, etc.). Students without baseline licensure may be admitted on the condition that they receive baseline licensure by the end of the first semester of enrollment. Once classes begin, we expect students with baseline licensure to be working actively toward receiving terminal licensure (i.e., LCSW, LCPC), following their state's guidelines regarding clinical supervision.
- An active weekly clinical caseload: ICSW doctoral students need to discuss their clinical work regularly, both in class and in consultation with members of the faculty, which will help prepare them for a clinical social work job.

Minimum Admission Requirements – Master’s in Clinical Counseling & Psychotherapy

For consideration for the master's program (onsite and distance) include:

- Bachelor’s degree from an accredited college or university — degree need not be in psychology or social work
- Minimum 3.0 GPA at all institutions of higher education
- GRE is not required

Attendance Policy

Students are required to attend all class sessions. The intimacy and intensity of our classroom environments make consistent attendance very important. If a student must miss a class, it is their responsibility to inform the instructor of the anticipated absence in advance. Students who are absent will be responsible for the work that they missed and should consult their instructor to make arrangements. If the work is not made up to the instructor’s satisfaction, the overall grade for the course may be lowered one level. **For PhD students, more than one absence may result in either a withdrawal from the class or a failing grade. For master’s students, more than two absences may result in either a withdrawal from the class or a failing grade.** Instructors should inform the Assistant Dean of Academic Affairs if there are concerns about a student’s attendance. Instructors must notify the Assistant Dean of Academic Affairs once any student has reached two absences. In extenuating circumstances where the student misses more than one PhD class or two MA classes, special consideration may be given, and a plan of remediation may be developed with the student’s instructor and Assistant Dean of Academic Affairs.

If extenuating circumstances result in ICSW cancelling classes, the Assistant Dean of Academic Affairs will work with faculty to reschedule.

Audit Policy

ICSW students and alumni are eligible to audit any class that is offered within their program, with the instructor’s permission. Charges for auditing depend on the status of the person making the request.

<u>Status</u>	<u>Charge</u>
Student	Free
Advanced PhD Candidate	\$250
Alumni	\$500
Core Faculty	Free
Instructor	\$250
Other	\$750

Students in a different ICSW program may audit any class that is offered with both the Assistant Dean of Academic Affairs' consent and with the instructor's permission. The charge for auditing will be \$750 per class.

Commitment to Free Expression and The Free Exchange of Ideas at ICSW

The purpose of this policy is to protect and enhance the free exchange of ideas, the right to free expression at ICSW, subject to limitations on unlawful/unprotected speech and to clearly stated, reasonable, and nondiscriminatory rules regarding time, place, and manner. All persons on the ICSW campus, including members of the ICSW community and visitors or guests, are protected by and subject to freedom of speech laws and this policy. In permitting the exercise of free speech, ICSW does not sponsor or sanction the messages stated or the methods of speech used, unless expressly stated otherwise.

I. ICSW General Policy and Scope of the Policy

Free expression and the free exchange of ideas are central to the goals of a teaching institution, and certainly, central to ICSW's core mission. As such, ICSW is committed to protecting and enhancing the free exchange of ideas, including artistic expression, subject to limitations on unlawful/unprotected speech and to clearly stated, reasonable, and nondiscriminatory rules regarding time, place, and manner (as described in Section II below). All persons on the ICSW campus, including members of the ICSW community and visitors or guests, are protected by and subject to this policy as further set forth below. In permitting the exercise of free expression, ICSW does not sponsor or sanction the messages stated or the methods of speech used, unless expressly stated otherwise.

This policy applies to the free exchange of ideas in the classroom. Discussion and expression of all views relevant to the subject matter of a class, even if those views are unpopular, are recognized as central to the educational process. Faculty will evaluate students solely on an academic basis reasonably related to legitimate pedagogical concerns, and not on student opinions or conduct unrelated to the academic standards of a course. A faculty member also enjoys the right to exercise free expression in their capacity as a citizen, and ICSW will not review such expressions of ideas or viewpoints except in the rare circumstance in which such communications seriously undermine the faculty member's fitness to serve the ICSW community.

II. Limitations

Nothing in this policy shall be construed as protecting, authorizing, or condoning the following unlawful or otherwise unprotected speech: (a) obscenity; (b) child pornography; (c) defamation; (d) speech that by its very utterance tends to incite an immediate breach of the peace by the

hearer; (e) speech that incites or produces imminent lawless action and that is likely to incite or produce such action; (f) speech that creates a hostile environment within the meaning of Title IX of the Educational Amendments of 1972, Title VII of the Civil Rights Act of 1964, or other applicable civil or human rights laws; (g) speech that substantially disrupts, obstructs, or interferes with classes, teaching, the use of offices, or other activities related to teaching, administration, or operations of ICSW; (h) speech that damages ICSW or the private property of any other entity or individual; or (i) speech that discloses the confidential, private, or proprietary information of ICSW or others without appropriate authorization. In addition, faculty members have the right to limit classroom discussion and topics of discussion to those deemed reasonably related to the subject matter of the class. Student rights to free expression do not include impinging on the ability of instructors to teach or the rights of other students to learn, and neither faculty members nor ICSW will permit interference with or disruption of classes.

Students or employees who violate this policy or its referenced procedures are subject to ICSW discipline, up to and including dismissal from the institution or employment. All persons who violate this policy may also be directed to leave campus, may be barred from campus, and may be subject to criminal trespass laws in the event of failure to comply.

III. Relationship of Free Expression to Academic Freedom

In addition to promoting free expression, ICSW recognizes the distinct right to academic freedom enjoyed by ICSW faculty. Academic freedom describes a set of rights relating to teaching, research, and speech undertaken as a private citizen. The parameters of ICSW's Academic Freedom Policy are described in the Articles of Academic Governance.

For purposes of this Policy, it is important to note that a faculty member enjoys a broad freedom to exercise free expression in his or her capacity as a citizen. ICSW will not review such expressions of ideas or viewpoints except in the rare circumstance in which such expressions or viewpoints seriously undermine the faculty member's fitness to serve the ICSW community. In such circumstances, any such review will be conducted pursuant to, and discipline will be preceded by, appropriate faculty review processes set forth in the Articles of Academic Governance.

IV. Speakers

Speakers invited or sponsored by ICSW shall be permitted free expression of their opinions and viewpoints fully consistent with the limitations set forth in Section II above. ICSW also deeply values and models respectful and collegial treatment of such presenters, even those who take positions that may be controversial or challenging to the ICSW community. The ability of presenters to speak, and of audiences to hear a presenter speak free from undue disruption and interference, shall therefore be protected.

ICSW reserves the right to determine who will be invited to speak on campus and must approve all invitations to speak at faculty, staff, or student events that occur on campus or under the auspices of ICSW. ICSW also reserves the right to revoke prior invitations, cancel speaking events, remove presenters, or terminate presentations where ICSW has a reasonable concern that the Limitations

set forth above will not be observed or that safety and order cannot be maintained.

V. Gatherings, Protests, and Demonstrations

To facilitate robust debate and the free exchange of ideas, ICSW recognizes that peaceful gatherings, protests and demonstrations are legitimate means of expression and are permitted subject to the following limitations. Specifically, no such gathering, protest, or demonstration:

- 1) May take place in indoor rooms/areas where quiet or reflection may be expected by those using these rooms/areas.
- 2) Will be permitted if it is violent or if it threatens to turn violent or threatening to the safety and security of ICSW or individuals, in the reasonable opinion of ICSW administrators or law enforcement.
- 3) May disrupt the function of ICSW, interfere with the rights of other members of the ICSW community, or damage ICSW or private property.
- 4) May violate campus or legal limitations regarding unlawful/unprotected speech, as set forth in Section II above.
- 5) May be undertaken without being scheduled in advance and subject to reasonable time, place, and manner restrictions, which prior scheduling is required to ensure lack of disruption of teaching, meetings, or ICSW operations; or
- 6) May be permitted if it does or may violate City ordinances or procedures for outdoor street gatherings.

VI. Posting of Signs, Notices, Posters, and Banners; Leafletting and Commercial Solicitations

Unless expressly designated for broader use, bulletin boards, easels, and computers maintained by ICSW, and all walls, doors, whiteboards, chalkboards, windows, and other areas within classrooms, are reserved exclusively for official ICSW communications and are not available for posting of general information or speech. Likewise, the ICSW website is reserved for official ICSW communications; except in designated portions of the website or electronic communications that invite comments or interaction, ICSW's website may not be used to post information or engage in speech that does not represent official communications of ICSW. Messages or slogans of any kind shall not be painted, hung, distributed, or otherwise written on buildings, windows, sidewalks, walls, or other structures or surfaces, or on the personal property of others. Leaflets and commercial solicitations or appeals may only be circulated or distributed, whether in hard-copy form within the building or through use of ICSW's email system, upon prior written approval by the Dean of Students or Provost and Dean of Academic Affairs.

VII. Appeals

Any person seeking to appeal decisions made because of this policy, may do so by submitting a written appeal to ICSW within 10 business days of the adverse decision. The appeals committee will be comprised of the President of ICSW, Provost and Dean of Academic Affairs, and Director of

Finance and Operations. The written appeal must include the specific reasons for the appeal request. The decision of the Appeals Committee shall be final.

VI. Revisions and Updates to this Policy

ICSW reserves the right to revise or update this Policy to address the changing educational, operational, or compliance needs of ICSW and its campus community. The President in consultation with the faculty will recommend to the Board of Directors changes to the Policy. Any such revisions or updates will take effect as of the date adopted by the Board of Directors, unless otherwise stated by the Board.

Continuing Education Program

The Continuing Education and Professional Development program is designed to promote a deeper understanding of psychodynamic theories, skills, and values that form practice. Continuing Professional Education provides social workers, professional counselors, psychologists, and other human service professionals meaningful opportunities to expand their knowledge base and practice skills to meet the needs of their clients and organizations more effectively.

Continuing Education Credits

The Institute for Clinical Social Work is licensed by the State of Illinois Department of Finance and Professional Regulation (IDFPR): Division of Professional Regulation to provide Continuing Education Units (CEUs) and required ethics and diversity credits to Social Workers, Clinical Psychologists, Marriage and Family Therapists, Professional Counselors and Registered Social Workers. To receive CEUs, IDFPR now requires that remote programs (e.g., Zoom-based courses) include an examination.

The Institute for Clinical Social Work is also licensed by the Association of Social Work Boards (ASWB) to offer social work CEUs nationally. ASWB is the nonprofit organization composed of and owned by the social work and regulatory boards and colleges of all 50 U.S. states, the District of Columbia, the U.S. Virgin Islands, Guam, the Northern Mariana Islands, and all 10 Canadian provinces.

ICSW students are eligible to receive CEUs for the classes they take as part of the Master's or Doctoral program. Students should consult their home state licensing board for conversion of course credit hours to continuing education units.

Disability Services Policy

Purpose and Commitment

The Institute for Clinical Social Work (ICSW) is committed to ensuring equal access to its academic programs for qualified students with disabilities. ICSW affirms that disability is a dimension of diversity and is committed to fostering an inclusive educational environment that supports academic excellence and ethical, professional practice.

This policy establishes protocols and standards for the provision of Disability Services across ICSW's master's and doctoral programs.

Legal and Regulatory Foundations

ICSW complies with:

- Americans with Disabilities Act (ADA), Titles II & III
- Section 504 of the Rehabilitation Act of 1973
- ADA Amendments Act (ADAAA)

ICSW shall provide qualified students with disabilities equal access to all academic components of its programs. Accommodations will not fundamentally alter essential program requirements or compromise academic integrity or professional competency standards.

Disability Services procedures align with standards established by relevant accrediting bodies, including the Higher Education Commission. Approved accommodations must not compromise competency-based learning outcomes, ethical standards, professional behavior expectations, or required clinical skill development as defined by accrediting bodies and ICSW program competencies.

Disabilities Services Coordinator

The Dean of Students is the designated Disabilities Coordinator for ICSW. The Disabilities Coordinator:

- Is trained in ADA/Section 504 compliance
- Understands graduate-level clinical education and responsibilities

Confidentiality and Record Management

- Disability documentation shall be stored separately from academic and clinical evaluation records and maintained by the Disabilities Coordinator.
- Records will be maintained in compliance with FERPA and applicable privacy laws.
- Health-related documentation will be handled in a HIPAA-aware manner, where applicable.
- Faculty and supervisors will receive formal accommodation notices outlining approved accommodations only. Diagnostic information will not be disclosed without written student consent.

Student Eligibility and Documentation Protocols

ICSW recognizes disabilities consistent with federal law, including but not limited to:

- Physical disabilities
- Sensory impairments
- Learning disabilities
- ADHD
- Chronic medical conditions
- Psychiatric disabilities
- Neurodivergence
- Temporary disabilities (e.g., injury, pregnancy-related conditions)

Documentation Standards

Students requesting accommodations must provide documentation that:

- Is generally current (within 3–5 years, unless the condition is permanent and non-changing)
- Is provided by a qualified, licensed professional
- Describes the functional limitations in academic, clinical, and/or field environments
- Includes recommended accommodations where appropriate

Interactive Process Requirement

ICSW will engage in an individualized, interactive process with the student to:

- Review documentation
- Identify functional limitations
- Evaluate essential program requirements
- Determine reasonable accommodations

There shall be no “one-size-fits-all” accommodations. All determinations are individualized.

Academic Accommodations

Academic accommodations may improve, but are not limited to:

- Extended time on examinations
- Reduced-distraction testing environment
- Note-taking assistance
- Accessible course materials (audio, digital, alternative formats)
- Assistive technology
- Flexibility in attendance policies (when pedagogically and clinically appropriate)

The following are not considered reasonable accommodations:

- Waiving or eliminating core competencies
- Substantially reordering course sequences in ways that disrupt competency development
- Waiving or bypassing prerequisites
- Lowering academic or ethical standards
- Reducing required credit hour minimums
- Excusing students from essential requirements

Accommodations must maintain academic rigor and preserve required learning objectives.

Student Responsibilities

Students seeking accommodations are responsible for:

- Initiating contact with the Disabilities Coordinator.
- Disclosing the need for accommodation in a timely manner.
- Requesting accommodations prior to the semester or clinical placement whenever possible.
- Renewing their accommodations with the Disabilities Coordinator each term.
- Providing their approved accommodations letter to faculty at the beginning of each semester.

Faculty Responsibilities

Faculty are required to:

- Implement approved accommodations in a timely and good-faith manner
- Maintain confidentiality
- Avoid independent denial, modification, or disregard of approved accommodations
- Consult with the Disabilities Coordinator regarding any implementation concerns or challenges

Appeals Process

Students have the right to appeal:

- Denial of requested accommodations
- Disputes regarding implementation

Appeals shall be reviewed by a designated administrator or committee independent of the original determination. For more information, see the ICSW Grievance Policy.

Disability Services at ICSW operates within this balance, ensuring access without compromising competence.

Distance Learning Policies

Online classes are delivered using a live audio video conferencing program. ICSW gives equal weight to the student's participation online and onsite. The following guidelines should be followed:

- During online classes, all students are expected to be seated, have their cameras on, be in a private space, remain on mute unless engaged in class conversation, and demonstrate engagement in class discussions and presentations.
- During online classes, intrusions by children, pets, and other family members are to be avoided.
- To ensure confidentiality, students should not have their classes transcribed or recorded without explicit permission from the class instructor and/or if an accommodation for this has been

approved.

- Attendance at onsite weekend (PhD Distance students) is mandatory. Instructors may, but are not expected to, record or broadcast the class. Students with extenuating circumstances that would prevent them from attending an onsite weekend in-person must contact the Assistant Dean of Academic Affairs for approval to attend the onsite weekend virtually. International students are not required to attend onsite weekends in person and may attend virtually. Non-attendance of onsite classes is a serious progression issue. Students missing any onsite classes without the approval of the Assistant Dean of Academic Affairs and the Provost and Dean of Academic Affairs are subject to a progression referral.
- There is one onsite weekend per semester for the PhD distance program, with the exception of the summer semester. In the case of weather grossly interfering with air travel, ICSW will notify students via email and an online alert of alternate plans. Students are expected to watch their email for updates. During weather emergencies, students are to log on the entire weekend of classes.

Drops/Withdrawal Policy

Students may **Drop** one or more classes through the second full week of the semester. The specific drop deadline per term is specified on the Academic Calendar. When a class is dropped, the class is not reflected on a student's transcript and 100% of tuition is refunded.

Students may **Withdraw** from one or more classes through the ninth full week of the semester. Withdrawals will show on a student's transcript with a grade of "W" (Withdrawn), and their GPA will not be impacted.

It is ICSW policy that attendance will be monitored in all classes. However, non-attendance of a course does not constitute an official drop or withdraw from a course or courses.

Students who withdraw before the end of the third week in the semester will receive a 50% tuition refund (specific deadline per term is specified on the Academic Calendar). Week of Drop/Withdrawal Refund Percentage

First Two Weeks	100%
Third Week	50%
After Third Week	0%

According to federal regulations, if a student who receives federal financial aid leaves the Institute during a semester, those federal Title IV financial aid funds may have to be adjusted and, in some instances, repaid to federal sources. This may result in students having a balance due to ICSW.

Students with extenuating circumstances can submit an appeal to request an exception to ICSW's drop, withdrawal, and refund policies. Exceptions will only be granted if the student can demonstrate extenuating circumstances and at the discretion of the administration. Students must submit a written appeal for consideration by the end of the following semester in question. This

appeal may or may not supersede the federal regulations around Title IV funding.

Return of Title IV (R2T4) Policy

Federal Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which assistance is awarded. Students receiving financial aid who withdraw or stop attending may be required to return a portion of financial aid received. Once notified of a total withdrawal, the institution is required to apply a federally mandated formula to determine how much of the federal funding was “earned” by the student up to the time of withdrawal. This review and recalculation is called a “Return of Title IV Aid Calculation.”

Calculation of Title IV Returns

The calculation for what amount of Title IV funds that may need to be returned are calculated based on the number of days the student attended school during the semester. Factors that affect this calculation include the start of the term date, the date of withdrawal, any breaks that fall within the term and the final day of the term. The calculation is the percentage of days attended divided by the number of days in the term. That is the percentage that is utilized when calculating the amount of title IV funds that may need to be returned.

Order of Title IV Program Fund Returns

- Unsubsidized Direct Loans
- Direct PLUS Loans

Time Frame of Title IV Program Fund Returns

The time frame for return of funds will be as soon as administratively possible but no later than **45 days** after determining a student has withdrawn.

Post-Withdrawal Disbursement

If you did not receive all the funds that you earned, you may be due a post-withdrawal disbursement.

- Grant funds must be disbursed within **45 days**.
- If your post-withdrawal disbursement includes loan funds, they will be offered to you within **30 days**. ICSW must obtain your permission within 14 days to disburse the loan funds to you. You may choose to decline some or all the loan funds so that you do not incur additional debt.

All post-withdrawal disbursements are applied to a student’s account first towards outstanding tuition. If you receive (or ICSW or parent receive on your behalf) excess Title IV program funds that must be returned, ICSW must return a portion of the excess equal to the lesser of:

1. your institutional charges multiplied by the unearned percentage of your funds, or the entire amount of excess funds.

The school must return this amount even if it did not keep this amount of your Title IV program funds.

Financial Impacts of Title IV Program Fund Returns

Depending upon the Title IV calculation, the following will occur:

- If the R2T4 calculation results in a credit balance on the student's account, the credit balance will be disbursed as soon as possible but no later than **14 days** after the calculation of R2T4.
- If the R2T4 calculation results in an amount to be returned that exceeds the school's portion, ICSW will return the amount to the federal programs on behalf of the student, and the student must repay the funds to ICSW.

Financial Holds / Administrative Leave of Absence Policy

Students who are not in good financial standing with ICSW may have a financial hold placed on their student account. Good financial standing with the institution indicates either that the student has paid their tuition bill on time, in full, or that they have worked with the Director of Finance and Operations, on an agreed upon payment plan. Students who have an outstanding tuition balance and no payment plan in place by June 30 will have a financial hold placed on their account and they will be unable to register for classes or work on their dissertation for the upcoming fall semester and until they have addressed their account and have returned to good financial standing.

Students placed on a financial hold will have one semester to bring their account into good financial standing while maintaining their student status. At the end of this semester, students who have not returned to good financial standing will be placed on an Administrative Leave of Absence with the school. Please note that students on Administrative Leave of Absence may trigger repayment of federal student loans while away from their studies. Students on Administrative Leave of Absence will have six months to bring their financial account into good standing, or they will be withdrawn as students from ICSW at that time. Students who bring their account into good financial standing will have their administrative leave of absence and financial hold lifted and may return to their schoolwork.

Leave of Absence Policy

A student may request a Leave of Absence (LOA) when circumstances temporarily prevent continued enrollment in their academic program. In order to request a Leave of Absence, the student must complete the Leave of Absence (LOA) form (available on the ICSW website). LOA requests may be submitted at any time within the academic year, but the student will be responsible for tuition expenses incurred in accordance with the academic calendar if the request is submitted during an academic term of enrollment after the add/drop deadline. Provost and Dean of Academic Affairs A Leave of Absence is not considered approved until it has been reviewed and approved by both the Assistant Dean of Academic Affairs and the Director of Finance and Operations.

Students who owe a tuition balance to ICSW may not be approved for LOA until the balance is paid, or they enter a payment plan. Tuition paid prior to an approved leave of absence, and not yet utilized, will be held and credited to the student's tuition when they return to the program. During an approved Leave of Absence, students may not participate in coursework, clinical consultation, dissertation consultation, or any other academic activities associated with their program. The student may not initiate any new consultations.

Students receiving federal financial aid should be aware that an approved Leave of Absence extending beyond 180 days may affect their federal student loan repayment status. Although an approved Leave of Absence beyond 180 days does not affect a student's academic status at ICSW or automatically terminate their enrollment with the institution, federal regulations require ICSW to report the student as withdrawn for federal financial aid purposes once the allowable 180 days of Leave of Absence period has been exceeded. As a result, federal student loan repayment obligations may begin in accordance with the terms established by the student's federal loan servicer. Students are encouraged to contact the Office of Financial Aid or their federal loan servicer to better understand how an extended Leave of Absence may affect their financial aid and loan repayment obligations.

Please note that leaves of absence do not extend a student's time to completion allowance (See Time to Completion policies under program sections).

Students are encouraged to consult with the Office of Financial Aid and the Office of the Registrar before requesting a Leave of Absence to fully understand the academic and financial implications of their decision.

[Federal Requirements for Withdrawals](#)

An approved Leave of Absence may be granted for up to one year. Students requiring additional time must submit a written request for an extension prior to the expiration of the approved Leave of Absence through the Leave of Absence Form. Extensions may be approved for up to one additional year. Students who do not return by the expiration of their approved Leave of Absence, who have not received approval for an extension, or who have already taken a one year extension of their leave, will be administratively withdrawn from their academic program at ICSW. Students should be advised that taking a leave of absence from ICSW does not increase the amount of available time to degree completion under the school's Time to Completion Policy.

Students wishing to return from an approved Leave of Absence must complete a Return from Leave of Absence (RLOA) form (available on the ICSW website). Return requests must be approved by both the Assistant Dean of Academic Affairs and the Director of Finance and Operations before the student may resume enrollment. Students who owe a tuition balance to ICSW may not be approved for RLOA until the balance is paid, or they enter a payment plan.

[Registration Policies and Procedures](#)

Registration dates for each term are identified on the Academic Calendar on ICSW's website. The

Associate Registrar will send correspondence to all enrolled students prior to the registration date to confirm the registration procedures. Full-time students will be registered by the Associate Registrar unless students opt-out, and unique and part-time students should be in touch with the Registrar to confirm a registration plan. Once registered, it is the student's responsibility to confirm their schedule is correct. All corrections and concerns should be directed to the Registrar & .

Full time students must follow the full-time curriculum plan for their cohort, and part-time students must follow the part-time curriculum plan. Unique students must follow their plan as approved by the Assistant Dean of Academic Affairs. All students are responsible for up-to-date tracking of their clinical consultation meetings.

Students with financial holds on their accounts may not be registered until their financial account is addressed.

Continuous Enrollment Requirement

ICSW requires continuous enrollment for all students. This means students must maintain registration each academic term of their program (Fall and Spring for MA; Fall, Spring and Summer for PhD students who have not yet finished coursework; Fall and Spring for Advanced PhD students), unless they are on approved leave of absence. Students wishing to maintain their active student status and not take a leave of absence for a semester when not enrolled in other courses must enroll in CCP 999: Continuous Enrollment (MA students) or PhD 999: Continuous Enrollment (PhD students). Continuous enrollment maintains a student's active status in their graduate program during periods of independent scholarly work (i.e. finishing incomplete courses, engaging in continued clinical consultation, extended preparation for a capstone, etc.), absent additional course enrollment. Students must be enrolled in coursework or continuous enrollment or must be on approved Leave of Absence every semester until all program requirements are completed and the degree is awarded. Students not enrolled in coursework or continuous enrollment who do not request a leave of absence will be placed on Administrative Leave of Absence. There is a \$250 continuous enrollment fee for each semester of continuous enrollment.

Satisfactory Academic Progress (SAP)

To remain eligible for federal financial aid, you must make satisfactory academic progress (SAP) as a student, which means demonstrating that you are successfully working toward your degree. All students, whether receiving financial aid or not, are required to meet SAP standards.

SAP is evaluated at the end of each term for all students who are in a financial aid eligible degree program, including both full-time and part-time enrollment. This applies to all periods of the student's enrollment, and the standards are the same for students who are and are not receiving Title IV aid. Summer term is included for PhD students.

The Institute for Clinical Social Work measures Satisfactory Academic Progress after each semester (Fall, Spring, Summer) using the following guidelines:

- A minimum Grade Point Average (GPA) of 3.0. See "Grading Standards" for how grades are

assigned.

- Federal financial aid may only be awarded for coursework that applies toward the requirements of your degree program. Students are not eligible to receive financial aid for coursework that does not count toward degree completion.
- Transfer credits accepted toward the student's educational program are counted as both attempted and completed credits when evaluating SAP but are not included in the cumulative GPA calculation.
- Students must successfully complete at least 67% of all cumulative attempted credit hours to maintain satisfactory academic progress. Pace is calculated by dividing cumulative completed credit hours by cumulative attempted credit hours. [Federal Guidance on Satisfactory Academic Progress](#)
- Courses with grades of **W**, or **I** are counted as attempted but not completed credits.
- Repeated coursework counts as attempted each time it is taken. Credit for a successfully completed course is counted only once toward pace.
- Audited courses are not included in the SAP calculation.
- Withdrawn courses count as attempted credits and toward the maximum time frame but are not included in the GPA calculation.
- IP grades are excluded from pace calculations

Maximum Time Frame: Students must complete their programs of study within 150% of the total credit hours required for the completion of their degree program at ICSW.

- MA Program: 60 required credits → maximum 90 attempted credits
- PhD Program: 76 required credits → maximum 114 attempted credits

The SAP evaluation is cumulative and includes all attempted coursework applicable to the student's program, including transfer credits accepted by ICSW, withdrawals, repeated coursework, and incomplete grades, as applicable.

SAP Warning

If you are not meeting SAP standards, prior to the next term, you will receive an email notice that you have been placed on Warning. This Warning will be in effect for the next term of enrollment. During this time, you will be eligible to receive financial aid.

Students who meet SAP standards by the end of the Warning period will return to good standing. Students who fail to meet SAP standards at the conclusion of the Warning period will be placed on Financial Aid Suspension and become ineligible for federal financial aid unless they successfully appeal in accordance with the Institute's SAP Appeal Policy.

SAP Suspension and Appeals

If you have been placed on financial aid suspension due to failure to maintain SAP after a Warning semester, your financial aid awards will be canceled for the term in question. Students can submit a written appeal to the SAP Appeals Review Committee, which consists of representatives from Financial Aid and Academic Affairs. Appeals must be submitted within 14 days after the date of the Financial Aid Suspension notice.

Appeals should describe any extenuating circumstances that may have affected a student's ability to maintain satisfactory academic progress. Extenuating circumstances that will be considered for an appeal include the following items:

- Death of a relative of the student.
- An injury or serious illness of the student (medical documentation required).
- Other extraordinary circumstances may be considered on a case-by-case basis (documentation required)

Circumstances related to the typical adjustment to college life are not considered for appealing a suspension.

Only up to two extenuating circumstances SAP appeals are allowable during a student's time at ICSW.

In addition, the appeal should describe the actions the student plans to take to re-establish satisfactory academic progress. Relevant documentation is required. Students will be notified via email if their appeal has been approved within 10 business days of the receipt of their appeal.

If the appeal is successful, the student will be placed on Financial Aid Probation for one semester with an academic plan which will be established by the committee and the student, and with input from the student's academic advisor when appropriate. The individual academic plan will establish the criteria for continued financial aid for future semesters and will be reevaluated each semester. If the student does not meet the conditions outlined in their academic plan, they will lose their aid eligibility.

Status Change Policies and Procedures

Change to/from Distance/Onsite or Full-Time/Part-Time Status

Students wishing to change the modality or status of their program must obtain the written permission of the Provost and Dean of Academic Affairs, plus complete fill out the "Change of Status" form found on our website and submit it to the Registrar prior to the beginning of the semester for which the change is

requested. Written support may be requested from the student's advisor, instructors or clinical consultants.

Returning Students

Students who have taken an approved Leave of Absence and who wish to return to their studies may request a Return from Leave of Absence (RLOA):

- The student completes a Return from Leave of Absence (RLOA) form (on the website). The request is reviewed by the Assistant Dean of Academic Affairs and the Director of Finance and Operations to ensure that the student is in good financial and academic standing to return to their studies.
- A student will not be approved to return from LOA if they are not in good financial standing.
- A student will not be approved to return from LOA if they are not in good academic standing, without an approved remediation plan in place. The approval to return from LOA will be dependent upon the student's academic status, course options and availability; the student's academic plan and semester of return are at the discretion of the Assistant Dean of Academic Affairs.
- The Associate Registrar will inform the student of their approved RLOA and will work with the student to re-enroll in classes.

If a prior student wishes to return to ICSW but their status is withdrawn rather than on an approved Leave of Absence, that individual must reapply for admission to ICSW and be offered admission in order to return. Upon readmission:

- A file review will be conducted with the student to determine outstanding course or Practicum work. Credit will be given for the completion of prior coursework at ICSW where possible. All plans for degree completion must be approved by the Provost and Dean of Academic Affairs.
- A progression committee meeting may be scheduled to discuss the student's request, if necessary.
- The student may be required take additional courses or retake key courses depending on the amount of time lapsed and evidence of capacity as reflected in prior and recent work. This includes clinical and research practica.
- The student may be readmitted under a Probationary Status and/or be given timelines for task completion
- All financial obligations to ICSW must be paid in full prior to reactivation of student status.
- The Admissions Committee must approve the readmission.
- The timeline for completion for students who were withdrawn and readmitted begins from the student's initial term of enrollment from their first admission; the timeline to completion does not restart for readmitted students. See Time to Completion Policies under the program sections.

Student at Large Program

ICSW's Student-at-Large program is designed for professionals or clinicians who are interested in learning about psychodynamic theories and practice. Our courses are taught by faculty who are experts in the field of mental health. Students may enroll in any course except for Case Conference courses subject to instructor approval. Students can receive a certificate of completion or CEU credits. No more than four courses may be transferred for credit to our Master's or PhD program. Transfer students will also be expected to fulfill all class requirements to receive full credit and complete the application process for our PhD or Master's programs.

Admissions: Application and Interview with the Assistant Dean of Academic Affairs.

Student Evaluation and Grades

Classroom instructors grade students on their course work and submit evaluations on the caliber of each student's work. The purpose of grading is evaluative, as well as to provide a learning tool for students, i.e., to provide feedback on progress, strengths and weaknesses, and issues that need to be addressed.

Cumulative grade point average is based on full letter grades, not plus or minus grades. Only letter grades are recorded in the students' transcript. Instructors are required to submit full letter grades (not pluses or minuses) within two weeks after classes end.

Grading Standards

Grades are assigned according to the following standard:

A	Super Work	4.0 Value
B	Satisfactory Work	3.0 Value
C	Marginal Work	2.0 Value
F	Failure	0 Value
P	Pass	0 Value
AU	Audit	0 Value
I	Incomplete	0 Value
IP	In Progress	0 Value (Practicum & Capstones Ony)

Incompletes: An incomplete can be granted only in cases of extenuating circumstances and when the student has been in touch with the instructor in advance of the due date for the required work. Any incompletes must be resolved by the last day of the following semester (fall, spring, summer). If the work has not been completed by this date, the incomplete grade will convert to a failing grade. It is always the student's responsibility to initiate the process for an incomplete. It is also the responsibility of the student to turn in the completed work by the following semester's end.

When a student with an unresolved Incomplete (I) grade is granted an approved leave of absence, the period of the approved leave may be excluded from the time allowed for completion of the Incomplete, with the approval of the course instructor. In such cases, the deadline for completing the outstanding coursework will be paused for the duration of the approved leave and will resume when the student returns from leave. The extended deadline is not to exceed the end of the semester during which the students returns to active status.

The student is responsible for communicating with the instructor regarding the Incomplete and obtaining approval for the completion deadline to be paused. Instructor approval should be documented and submitted to the Registrar's Office via the Incomplete Form. If the instructor does not approve the pause, the original deadline for resolving the Incomplete remains in effect.

Late Assignments: A late assignment is one that is submitted after the deadline but before grades are submitted. Approval for turning assignments in late is determined by individual instructors.

Assignment of Credit Policy

In the Master's Program, the standard course extends over a fifteen-week period including final examinations week. Master's courses carry one credit for every fifteen class hours (encompassing both synchronous and asynchronous class time.) For every one-hour of class students are expected to do a minimum of two hours of work outside instructional time for each credit hour awarded. Courses in the PhD Program (onsite and distance) carry one credit for every eight class hours. One credit hour is equivalent to eight hours spent in class and a minimum of two hours work outside instructional for each credit hour awarded. Credit is earned if a student receives an A through C, or P grade.

Please note that a grade of F, I, IP, or Audit does not earn credit.

Transfer Credit Policy

ICSW evaluates transfer credit requests on an individual basis and may accept transfer credits from other accredited Master's or Doctoral Programs for courses which are equivalent to courses in the curriculum of ICSW's Master's or Doctoral Program, pending evaluation and approval by the Associate Registrar. Courses from non-accredited programs, including analytic institutes, may be considered for transfer credit with approval of the Assistant Dean of Academic Affairs, provided that the proposed course(s) to transfer meet all other criteria outlined in this policy.

Criteria for Evaluation of Transfer Credit:

- The evaluation will include a judgment of the general similarity in content and clock hours. Transcripts and syllabi must be provided by the student for review prior to granting transfer credit approval.
- ICSW will accept credits totaling no more than twenty percent of the required coursework in any ICSW degree program.
- Courses may be no more than five years old to be considered for transfer credit. For students seeking transfer credit from a nonaccredited program (i.e., analytic training), and if the above criteria are met, the student must successfully complete an evaluation of student learning to demonstrate knowledge of course content as determined by an appropriate ICSW faculty member selected by the Assistant Dean of Academic Affairs. If the faculty member determines competency

of the course content, the student will receive transfer credit (Grade of “TR”) as a substitution for taking the class and will not need to take it to complete their degree at ICSW.

Any articulation agreements between ICSW and other institutions that affect transfer credit will be identified within this policy.

NOTE REGARDING LICENSING REQUIREMENTS: It is the responsibility of the student/licensing applicant to ensure that coursework from institutions outside of ICSW submitted to the licensing board for license applications meet state requirements. Acceptance of transfer coursework by ICSW toward degree requirements does not guarantee that such coursework will satisfy state licensure requirements.

Section 2: General Policies and Procedures

Active Duty and Public Health Service Students

Students are expected to inform their command of their participation in the ICSW program and to discuss the need for periodic leaves to attend classes.

- In cases where leave is denied, the student is to provide the paperwork documenting the request for and denial of leave.
- In cases where training interferes with onsite or online classes, students are responsible for contacting instructors and for making up missed work. Evidence of the required training must be submitted to the Dean.
- In the case of deployment and pre-deployment training, the student is to inform the Assistant Dean of Academic Affairs and an accommodation will be devised.

Students who are deployed may take a leave of absence or continue with clinical consultation and/or courses if means of communication exists.

Collection Policy

Balances on student accounts must be paid in full, have financial aid funds applied, or be in a payment plan within 4 weeks from the start of the semester. The below highlights ICSW’s escalation processes for obtaining funds due on accounts that have not met institutional policies:

- Account must be paid off before graduation. This includes the graduation fee or \$350 for PhD graduates and \$300 for MA graduates (see Fee Schedule).

- Payment plans are 10-months, generally from September to June each year, and must be paid in full by June 30 of the given academic year

Any student that has an outstanding balance with ICSW, or is delinquent in making payments per a previously agreed upon payment plan, cannot do any of the following:

- Register for classes including the Clinical Practicum
- Schedule or hold a Case Presentation
- Schedule or hold a dissertation proposal or defense
- Receive copies of transcripts
- Receive an approved Leave of Absence
- Graduate

ICSW will not impose any penalty on Chapter 31, 33, and 35 beneficiaries, including the assessment of late fees, nor will it deny access to classes, libraries, or other educational institutions, or require these

individuals to borrow additional funds, because of the individual's inability to meet his or her financial obligations to the educational institution due to delayed disbursement of payment by the United States Department of Veterans Affairs.

Email Use Policy

Email services are intended to allow all ICSW students, faculty and staff to conduct institutional business. ICSW will provide all students upon matriculation and all faculty/staff upon employment with their official ICSW email address. The official email address is to be used for all school email correspondence. Communications from administration will be directed to the official email address on file and community members are responsible for checking this email inbox regularly. Use of personal email addresses for institutional business is prohibited. ICSW email addresses will remain active for graduating students until six months post-graduation. Students who withdraw from the institution and staff/faculty no longer employed by ICSW may lose access to their email address immediately.

Fee Schedule

Graduation Fee MA Students:	\$300
Graduation Fee PhD Students:	\$350
Fee for Graduates not attending ceremony:	\$150
Continuous Enrollment Fee:	\$250 per term

Any payment made via credit or debit card will be assessed a 3% processing fee

Financial Aid Timeline

October -May

Search and apply for Scholarships

- ICSW offers primarily Stafford Loans provided through the FFEL program. Getting your Ph.D. or Master's is a significant financial commitment and ICSW strongly suggests offsetting this financial burden by using private scholarships. You can find a list of internal scholarships on the ICSW website.

January 1

The FAFSA becomes available online at <https://studentaid.gov/h/apply-for-aid/fafsa>

June 15

ICSW FAFSA Completion Deadline

July 31

ICSW Financial Aid Forms Due

August 15

Signed Award Letter Due

- After receiving your financial information from the FAFSA and your other financial aid materials, ICSW will package an award for you and send you a detailed Award Letter regarding the aid you will receive. If you accept this award, you must login to the financial aid portal to sign the award letter.

Signed Master Promissory Note and Entrance Counseling Due

- If you are a first-time borrower at ICSW and receiving a Stafford or Grad PLUS loans, the lender will require that you sign a Master Promissory Note (MPN), which is a contract between borrower and lender wherein you as the borrower agree to repay your loans in full after you graduate, withdraw or drop below half-time status. Concurrently, entrance counseling, which gives you all the information you need to know about your loans, is the final step required before your loan can be disbursed.

May 15

Exit Counseling

Once a student is scheduled to graduate, withdraws or drops below half-time status, exit counseling is required. Exit counseling gives you all the information you need to know about repayment options and interest rates on your loans. Failure to complete exit counseling results in ICSW withholding the student's degree, certificate, transcripts and other documents.

Fraud Prevention and Detection Program

ICSW's fraud prevention and detection program was implemented in order to minimize potential risks associated with fraud at ICSW. We want to encourage any community member to inform us about any possible or suspected fraud. You can call or email the Director of Finance and Operations directly with any instances you may have witnessed or are unsure about. There is also an anonymous reporting mechanism to encourage reporting. Please send a detailed email message about any instances of possible or suspected fraud to: fraud@icsw.edu

Grievance Policy

The purpose of this policy is to ensure that students have a means and opportunity for fair resolution of disputes involving individual student complaints regarding course grades and other decisions involving a student's matriculation at ICSW.

ICSW also sets forth specific appeal processes for decisions involving requests for education records under the Family Education Records and Privacy Act (FERPA), and decisions regarding requests by students for accommodations, modifications, or auxiliary aids under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.

This Policy does not address other compliance-related grievances, such as those raised under the *Non-Discrimination Policy* and related Title IX Policy, including allegations of discrimination, harassment, or retaliation (except in the context of ADA accommodations), which are separately addressed in other ICSW policies and posted on ICSW's website. Other allegations of failure to comply with federal, state, or local law governing higher education may be addressed using other institutional policies or procedures, or as directed by ICSW.

Grievances may only be filed by the person who is themselves the aggrieved individual. Copies of all materials filed or generated about a grade grievance, including any resolution, will be placed in a student's file.

GRIEVANCES UNDER THIS POLICY MAY BE BROUGHT BY:

- Any student who is currently registered at ICSW
- Any student who was enrolled in the immediately preceding term at ICSW
- Any student on approved leave of absence from ICSW

APPLICATION OF POLICIES

Where a complaint or concern is subject to more than one grievance or appeal procedure – or where questions or ambiguities arise about the procedures – ICSW's Assistant Dean of Academic Affairs or designate will resolve the ambiguity or address the questions and advise the parties at issue about the appropriate procedure to be used to air a grievance or concern.

TIME LIMIT FOR FILING GRIEVANCES

Except in extraordinary circumstances and for good cause shown, all grievances must be filed

within 30 calendar days of the decision, action, or events giving rise to the grievance.

Students may petition the Assistant Dean of Academic Affairs to pursue a grievance that do not meet the time limit set forth in this Section. Any such petition should address why the student believes the situation

constitutes an extraordinary circumstance and why there is good cause for ICSW's consideration of the grievance. ICSW reserves the right to decline consideration of any grievances that do not in the view of ICSW satisfy the exception set forth in this Section.

SPECIFIC STUDENT GRIEVANCE PROCEDURES

A. GRADE GRIEVANCE

A student may appeal a final course or practicum grade if the student contends that they should receive a different final grade than their faculty member's evaluation of their performance using the documented course guidelines (e.g., syllabus). Grounds for a grade grievance may include one or more of the following:

- 1) The final grade violated the faculty member's or the Institute's written policies
- 2) There was a miscalculation of the final grade or miscalculation of the grade(s) for course components
- 3) The final grade was assigned on a basis that is arbitrary, capricious, or demonstrably inappropriate

considering the student's performance

Steps to pursue a grade grievance

- 1) The student should discuss their concerns directly with the faculty member or consultant of the course within 30 calendar days of receiving the final grade. If the issue is resolved, the grievance process will conclude, and the resolution will be documented and submitted to the Dean of Students and the Assistant Dean of Academic Affairs by the faculty member or consultant for the student's file.
- 2) If the student is not satisfied, within 60 calendar days of receiving the grade in question, they must file a written grade grievance via email. The faculty member cited in the grievance will receive a copy of this complaint, as well as the academic advisor, Sequence Chair, Dean of Students, and Assistant Dean of Academic Affairs. In this written communication, the student should explain their concerns about the final grade, present reasons for contending that the final grade is not correct, confirm they attempted to resolve the issue with the faculty member directly (Step 1), and asked the faculty member or consultant to explain, in writing, their reasons for the final grade.
 - a. The faculty member or consultant of the course should reply within 10 business days to the student's concerns, in full and in writing, copying the student's academic advisor, Sequence Chair, Dean of Students and the Assistant Dean of Academic Affairs. The faculty member's response will be sent to the student.
 - b. If the student is not satisfied with the faculty member's written explanation, the student should contact the Dean of Students and may request a meeting with the faculty member along with the Dean of Students and Assistant Dean of Academic Affairs. The meeting with the Dean of Students and Assistant Dean of Academic Affairs should

include the student, the faculty member or consultant, and can include the student's academic advisor. Within five business days of the meeting, the student should prepare and give copies to Dean of Students and Assistant Dean of Academic Affairs of the following:

- i. A copy of syllabus from the course in question, from the term in question
- ii. Copies of submitted assignments, including grades received
- iii. Copies of written communications with the faculty member during the entire grievance process in question. If the student does not have or cannot locate copies of any or all the above-referenced documentation, the student should request by email (with copies to the Dean of Students and Assistant Dean of Academic Affairs that the faculty member

circulate copies of any such documentation or communication in the possession of the faculty member.

- 3) The Dean of Students and Assistant Dean of Academic Affairs shall review the student's materials, and then meet with the faculty member or consultant, the student, and the student's advisor, if requested. At that time, the student will have an opportunity to present their arguments in favor of the grade grievance. Following this meeting, the Dean of Students and Assistant Dean of Academic Affairs will notify the student, academic advisor, Sequence Chair, and faculty member Provost and Dean of Academic Affairs of their decision in writing. If this does not resolve the grievance, the Assistant Dean of Academic Affairs, in consultation with the Provost, will review the grievance and make a decision which will be considered final and not subject to further grievance.

B. FAMILY EDUCATION RIGHTS AND PRIVACY ACT [FERPA] APPEAL

ICSW maintains records for all its students and former students and complies with the Family Education Rights and Privacy Act of 1974, 20 U.S.C. §1232g (FERPA), regarding the release of personally identifiable information concerning individual students. Academic transcripts and other information are sent to other institutions only upon the signed request of the student. Student records are available to the student on request for reviewing at ICSW. No materials may be added to, or deleted from, the student records except by the Academic Affairs and consistent with applicable law. Written grievances regarding ICSW's production and handling of education records may be filed with the Associate Registrar within 30 business days after the decision or incident in question and will be resolved in writing by the Associate Registrar or designee. A copy of the Associate Registrar's decision will be placed in the student's file.

The complaint should include:

- Student's name
- Contact information
- A description of the alleged FERPA violation
- The date(s) of the alleged incident
- The names of individuals involved, if known
- Any supporting documentation
- The remedy requested

The Associate Registrar (or designee) will acknowledge receipt of the complaint and conduct an appropriate review, which may include:

- Reviewing relevant education records
- Interviewing individuals involved
- Consulting applicable institutional policies and FERPA regulations

The institution may request additional information from the student if necessary.

Resolution:

A written response will generally be provided within 30 business days of receipt of the complaint, unless additional time is required due to the complexity of the matter.

The response will include:

- A summary of the investigation
- Findings regarding whether institutional policy or FERPA requirements were followed
- Any corrective actions, if applicable

Appeals:

If the student believes the complaint was not adequately resolved, the student may submit a written appeal to the Provost and Dean of Academic Affairs (or designee) within 10 business days of receiving the determination.

The appeal should state the basis for the appeal and include any new information that was not previously available.

The decision of the Provost and Dean of Academic Affairs (or designee) is final with respect to the institution's internal grievance process.

C. GRIEVANCE -- DENIAL OF REASONABLE ACCOMMODATION UNDER THE ADA AND SECTION 504 OF THE REHABILITATION ACT

As stated in the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101 *et seq.*, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 701, qualified students with disabilities are protected against discrimination and have the right to reasonable accommodations, modifications, and auxiliary aids that will allow them equal access to programs and services offered by ICSW. The Institute for Clinical Social Work is dedicated to supporting individuals with disabilities and has adopted the following accommodation and grievance process to facilitate provision of reasonable accommodations, modifications, and auxiliary aids, as well as resolution of any disputes relating to such requests. The Dean of Students is ICSW's Section 504 Coordinator.

Students with disabilities may request accommodations (including modifications and auxiliary aids) by contacting the Dean of Students. Additionally, if students disclose any disabilities on their self-assessment form, their advisor will make a referral to the Dean of Students to explore any potential accommodations. Documentation will be required to evaluate requests for reasonable accommodation, and ICSW will then engage in an interactive process with the student to determine what, if any, reasonable accommodations are available to assist the student in accessing programs and services. As part of this process, ICSW may consult with the student's licensed professional or treater.

Even if ICSW does not agree that a particular requested accommodation is reasonable or feasible to provide, consistent with ICSW's resources and applicable law, ICSW will interact and work with the student to select and provide a reasonable accommodation that will be acceptable and helpful to the student. If a student believes they have been subjected to discrimination because of a disability

or has been denied reasonable accommodations, the process and timeline for filing a grievance is as follows:

1) The student grievant is encouraged to express their concerns directly to the appropriate faculty/staff member involved in the conflict in an informal manner. The Dean of Students may also be contacted in writing at the same time to clarify rights and procedures for both parties. The Dean of Students will keep a written record of interactions and completion of each step of the grievance process to ensure that the student's request has been fairly addressed. The accommodations process will be fully documented, including notes recorded of pertinent discussions. The Dean of Students will be involved in such interactive discussions as appropriate and with the goal of identifying a reasonable accommodation or resolution of grievances informally without the need for the student to initiate a formal written grievance (as set forth in Section III-D-2 below). The Dean of Students will retain all requests for accommodation, supporting documentation, including the date(s) of the request(s) for academic adjustments or services, the nature of each request, the final determinations and the reason(s) for any denials in the student's file. These records will be maintained in a file separate from student education records as required by applicable law.

2) If the complaint is unresolved after the informal discussion, the student should file a formal, written complaint with the Provost and Dean of Academic Affairs. The written complaint should state the basis for the complaint, relevant details, and a proposed resolution to the dispute. ICSW may request additional documentation or an opportunity to speak with the professional who has provided the documentation supporting a request for accommodating dation. The Provost and Dean of Academic Affairs may exercise discretion in handling the grievance and may request that the student and/or other witnesses meet with the Provost and Dean of Academic Affairs to further discuss the grievance. The student also has the right to meet with the Provost and Dean of Academic Affairs. If a student meets with the Provost and Dean of Academic Affairs, the student can select a support person for assistance. If the student decides to have a support present, the student must notify the Provost and Dean of Academic Affairs of their presence and relationship to the student at least one full business day in advance of the student's meeting with the Provost and Dean of Academic Affairs. Support people are nonparticipating members at the meeting. They can advise the student privately but cannot present information or make statements during the meeting. The Provost and Dean of Academic Affairs shall consider all pertinent materials and determine the disposition of the grievance, which may include dismissal of the grievance, granting the relief requested by the student, or the creation of another disposition.

Where a student believes that a course or practicum grade reflects discrimination, harassment, or retaliation based on a protected characteristic, such complaints should be separately filed with the Dean of Students and will be investigated and resolved using ICSW's *Non-Discrimination Policy* and any other applicable ICSW Policy. Where a grade appeal is lodged on more than one basis, including based on discrimination harassment or retaliation, ICSW reserves the right to identify an applicable procedure and sequence that will be used to promptly and thoroughly resolve the student's allegations.

D. COMPLAINTS OR CONCERNS INVOLVING DISCRIMINATION, HARASSMENT, OR RETALIATION OR TITLE IX COMPLIANCE:

Complaints or concerns about discrimination, harassment, or retaliation, other than requests for

accommodation, are beyond the scope of this Grievance Policy. Title IX concerns or complaints are also beyond the scope of this Policy. Any such complaints or concerns should be brought to the attention of the Dean of Students or any individual in a leadership role at ICSW. Grievances originally filed under this Policy may ultimately be investigated and resolved using the ICSW's *Sexual Misconduct Policy*, *Anti-Discrimination Policy*, or other compliance policies, if the grievance appears to raise issues properly addressed under those Policies in lieu of, or in addition to, issues covered by Sections III A through D of this Policy. In the case of an ambiguity, or where a grievance appears to raise issues implicated by the above grievance policy as well as other ICSW policies, the Provost and Dean of Academic Affairs has the discretion to determine which policy shall be used to resolve the concern or grievance and will notify the grievant and other involved parties in writing of the applicable procedure.

Non-discrimination Policy

The commitment of the Institute for Clinical Social Work to the most fundamental principles of academic freedom, equality of opportunity, and human dignity requires that decisions involving students be based on individual merit and be free from invidious discrimination in all its forms.

It is the policy of the Institute for Clinical Social Work not to engage in discrimination or harassment against any person because of race, color, religion, sex, gender identity, national origin, ancestry, age, marital status, disability, sexual orientation, unfavorable discharge from the military, or status as a veteran or disabled veteran, and to comply with all federal and state nondiscrimination, equal opportunity, and affirmative action laws, orders, and regulations. The Institute's nondiscrimination policy applies to admission, employment, and access to and treatment in the Institute's programs and activities. Complaints of invidious discrimination prohibited by the Institute's policy are to be resolved within existing Institute procedures.

In accordance with the Rehabilitation Act of 1973, Section 504, and the Americans with Disabilities Act of 1990 (amended in 2009), the Institute for Clinical Social Work maintains the following policy statement: "No person shall, on the basis of handicap, be excluded from participation, in be denied the benefits of, or be subjected to discrimination under any education program or activity conducted by the Institute for Clinical Social Work."

For information about grievance procedures related to this statement, please refer to "ADA and Section 504 of the Rehabilitation Act Grievance Procedures".

Fostering an Inclusive Environment

Guided by the NASW and ACA Codes of Ethics and the mission of ICSW, students and faculty have a shared for championing social and economic justice for all members of society. This includes a commitment to eliminate personal and institutional discrimination, ensure access to needed resources and opportunities for all persons, especially those who are disadvantaged or disenfranchised. Prejudicial attitudes and discriminatory practices are examined. Students are expected to be respectful of the opinions of others while at the same time striving to attain the

ideals of social justice.

Retention of Data Policy

Data should be maintained in a secure location, i.e. locked file cabinet and/or secure online system for five years after graduation or withdrawal. The statistical data and IRB approval forms should be maintained indefinitely. Five years after graduation, raw data i.e. tapes, questionnaires may be destroyed. Once raw data are entered into a data management system and well protected, the system, too, may be kept indefinitely.

Sexual Misconduct Policy and Complaint Resolution Procedures

I. Policy Statement

Sexual misconduct, including sexual discrimination, harassment, non-consensual sexual intercourse and/or contact, exploitation, and interpersonal violence such as stalking, dating violence and/or domestic violence, will not be tolerated at the Institute for Clinical Social Work (ICSW). The Institute cares deeply about the health, safety, and well-being of all members of its community and is committed to fostering a community that promotes prompt reporting of all types of sexual misconduct, the timely and equitable resolution of sexual misconduct complaints, and educational and prevention programming.

This Policy applies to all members of the ICSW community, including students, faculty, staff, administrators, board members, contractors, vendors, and visitors. The Policy applies to on- campus and off campus conduct, including online or electronic conduct, when the off-campus conduct:

- i. occurs during an ICSW-sponsored employment or educational activity or program.
- ii. adversely impacts the education or employment of a member of the ICSW community; or
- iii. otherwise threatens the health and/or safety of a member of the ICSW community.

Students and employees continue to be subject to city, state, and federal laws while at ICSW, and violations of those laws may also constitute violations of this Policy. In such instances, ICSW may proceed with an investigation under this Policy independently of any criminal proceeding involving the same conduct and may impose sanctions for violation of this Policy even if such criminal proceeding is not yet resolved or is resolved in the Responding party's favor.

For students and ICSW employees, this Policy applies to conduct that takes place from the time a person accepts enrollment as a student or accepts employment and continues until the student graduates or otherwise separates from ICSW or the employee ceases employment.

NOTICE OF NON-DISCRIMINATION

ICSW does not discriminate based on sex in its educational programs or services or in the context of employment or admissions. Sexual misconduct, including sexual harassment as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides that:

No person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

This Policy prohibits sexual misconduct against all ICSW community members of any gender or sexual orientation or gender expression. This policy also prohibits harassment based on gender or sexual orientation that does not involve conduct of a sexual nature. Further information about Title IX and sex discrimination in education is available from the Office for Civil Rights (U.S. Department of Education, Citigroup Center, 500 Madison St., Suite 1475, Chicago, IL 60661-4544, 312-730-1560, OCRChicago@ed.gov, ed.gov.ocr), or ICSW's Title IX Coordinator as set forth directly below.

II. ROLE OF TITLE IX COORDINATOR

To manage ICSW's compliance with Title IX, ICSW has a designated Title IX Coordinator, Andrea Lucius (Assistant Dean of Academic Affairs of Academic Affairs), trained in the ICSW's policies and procedures, state and federal law and other issues related to addressing sexual misconduct.

Specifically, the Title IX Coordinator may do some or all the following:

- Oversees the investigation and resolution of all reports of prohibited conduct under this Policy;
- Advises any individual, including a reporting party, a responding party, or a third party, about the courses of action available at ICSW and in the community for resolving cases of sexual misconduct;
- Aids any "responsible employee" regarding how to appropriately respond to a report of prohibited conduct under this Policy;
- Conducts and/or reviews on-going climate checks, tracking, and monitoring of sexual misconduct allegations on campus;
- Oversees training, education, and prevention efforts; and
- Provides and participates in on-going training designed to assist in implementing these policies and procedures.

The Title IX Coordinator, Andrea Lucius, can be reached during regular business hours at 773-943-6504 or titleixcoordinator@icsw.edu

III. PROHIBITED CONDUCT

ICSW prohibits sexual misconduct. Sexual misconduct is a broad term that, as previously indicated, encompasses sexual harassment, non-consensual sexual intercourse or contact, sexual exploitation, domestic and dating violence, and stalking.

Sexual misconduct can occur between strangers or acquaintances, including people involved in an intimate or sexual relationship. Sexual misconduct can be committed by a person of any gender identity and can occur between people of the same or different gender identities. Sexual misconduct is a form of sex discrimination prohibited by federal and state discrimination laws. In addition, some forms of sexual misconduct violate the criminal laws of the State of Illinois. The following offenses are considered "sexual misconduct" and prohibited by ICSW.

A. “Sexual Harassment.” Sexual harassment is unwelcome conduct of a sexual nature. Sexual Harassment can include unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature, without regard to whether the parties are of the same or different gender when:

Submission to such conduct is either explicitly or implicitly a term or condition of an individual’s employment or status in a course, program or ICSW-sponsored activity, or is used as the basis for employment or educational decisions affecting that individual (also referred to as “quid pro quo”); or

Such conduct has the purpose or effect of unreasonably interfering with an individual’s educational experience or working conditions, i.e. it is sufficiently severe, pervasive, or persistent as to create an intimidating, hostile or offensive environment for working, learning or living on campus under both an objective and subjective standard (also referred to as “hostile environment”).

In considering whether conduct constitutes sexual harassment, ICSW considers the totality of the circumstances. Some examples of sexual harassment may include attempting to coerce an unwilling person into a sexual relationship; repeatedly subjecting a person to egregious, unwelcome sexual attention, innuendos or humor; punishing an individual for refusing to comply with a sexual based request; conditioning a benefit on submission to sexual advances; nonconsensual sexual contact or intercourse; or bullying based on gender or sex.

B. “Gender-Based Harassment.” Gender-based harassment includes acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on gender, sex or sex-stereotyping, even if those acts do not involve conduct of a sexual nature. Use of the term “sexual harassment” throughout this policy includes gender-based harassment/misconduct.

C. “Sexual Orientation-Based/Gender Identity-Based Harassment.” Sexual orientation-based harassment includes verbal, non-verbal, and physical acts of aggression, intimidation, or hostility based on an individual’s actual or perceived heterosexuality, homosexuality, bisexuality, or transsexuality/gender identity. Use of the term “sexual harassment” throughout this policy includes sexual orientation- based and gender identity-based harassment/misconduct.

D. “Non-Consensual Sexual Intercourse (or attempts to commit the same).” Non-consensual sexual intercourse means any penetration of the sex organs, anus, or mouth of another person, using any part of the body or an object, when consent is not present or force is used.

E. “Non-Consensual Sexual Contact (or attempt to commit the same).” Non-consensual sexual contact is the intentional touching or fondling a person’s genitals, breasts, thighs, groin, or buttocks, or any other contact of a sexual nature (including by bodily fluids), when consent is not present or force is used. This includes

contact done directly, through clothing, or with an object. It also includes causing or inducing a person, when consent is not present, to similarly touch, fondle, or contact oneself or someone.

F. "Sexual Exploitation." Sexual exploitation occurs when a person takes non- consensual or abusive sexual advantage of another for his/her own advantage or benefit, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other sexual misconduct offenses in this policy. Examples of sexual exploitation include, but are not limited to, invasion of sexual privacy, prostituting another person, non-consensual photographing, video or audio-taping of sexual activity, engaging in voyeurism, knowingly transmitting a sexually transmitted disease (STD) to another without disclosing STD status, exposing one's genitals in non-consensual circumstances, and inducing another to expose their genitals. Sexually based stalking and/or bullying may also be forms of sexual exploitation.

G. "Dating Violence." Dating violence is sexual or physical abuse of an individual, the threat of such abuse, or other violence by another person with whom the individual is or has been in a social relationship of a romantic or intimate nature. The existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence does not include acts covered under the definition of domestic violence below.

H. "Domestic Violence." Domestic violence is violence committed by a current or former spouse or intimate partner of the individual, by a someone with whom the individual shares a child in common, by someone who is cohabitating with or has cohabitated with the individual as a spouse or intimate partner, by someone similarly situated to a spouse of the individual under the domestic or family violence laws of the jurisdiction in which the violence occurred, or any other person against an adult or youth who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the violence occurred.

I. "Stalking." Stalking is a course of conduct directed at a specific that would cause a reasonable person to fear for their safety (or the safety of a third person) or suffer substantial emotional distress. For purposes of this definition, "course of conduct" means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Examples of stalking include, but are not limited to:

- a. following a person;
- b. being or remaining in close proximity to a person;
- c. entering or remaining on or near a person's property, residence, or place of employment;
- d. monitoring, observing or conducting surveillance of a person;
- e. threatening (directly or indirectly) a person;
- f. communicating to or about a person;
- g. giving gifts or objects to, or leaving items for, a person;

- h. interfering with or damaging a person's property (including pets); or
- i. engaging in other unwelcome contact.

IV. OTHER IMPORTANT DEFINITIONS

- A. **"Consent"** is: expressed through affirmative, voluntary words or actions mutually understandable to all parties involved; is given for a specific sexual act at a specific time and can be withdrawn at any time; and cannot be coerced or compelled by duress, threat, or force. Consent cannot be given by someone who, for any reason, cannot understand the facts, nature, extent, or implications of the sexual situation occurring, including, but not limited to, those who are under the legal age of consent (17 years in Illinois), asleep, unconscious, or mentally or physically incapacitated through the effects of drugs or alcohol, or mentally impaired due to an intellectual or other disability. In addition, consent cannot be and should not be assumed based on: silence; the absence of verbal or physical resistance; an individual's manner of dress; the existence of a prior or current relationship; or consent to prior sexual activity. Consent for sexual acts cannot be given by a third party* (*Except in cases of child sexual abuse under the Illinois Abused and Neglected Child Reporting Act, where the law requires that "mandated reporters" inform the Department of Children and Family Services when they have "reasonable cause to believe" that a child known to them in their professional or official capacity may be sexually abused. Under ANCRA, sexual abuse occurs when *a person responsible for the child's welfare* commits sexual penetration, sexual molestation, or sexual exploitation as defined by State law. Under the Illinois Abused and Neglected Child Reporting Act, "child" includes any person under the age of 18. Employees of ICSW are considered mandated reporters.).

Sexual activity with one individual does not constitute consent to sexual activity with another individual.

- A. **"Coercion"** involves forcing a person to act, where that person fears harm to self or others. Means of coercion may include, but are not limited to, pressure, threats, emotional intimidation, or the use of physical force.
- B. **Determining whether conduct is "unwelcome"** involves determining whether, based on the record as a whole, the reporting party (i) did not solicit or incite the challenged conduct; and (ii) regarded the conduct as undesirable or offensive.
- C. **"Incapacitation"** means the physical and/or mental inability to make informed, rational judgments. States of incapacitation may encompass, without limitations, circumstances in which the individual is asleep, blacked out, affected by drugs or alcohol, or intellectually incapable (or incapable due to some disability) of making an informed, rational judgment. Where alcohol or other drugs are involved, one does not have to be legally intoxicated or drunk to be considered incapacitated. Rather, incapacitation is determined by how the alcohol consumed impacts the individual's decision-making capacity, awareness of consequences, and ability to make informed judgments. The question for purposes of determining incapacitation is whether the Responding Party knew -- or a sober, reasonable person in the position of the Responding Party would or

should have known -- that the Reporting Party was incapacitated. Because incapacitation may be difficult to discern, individuals are strongly encouraged to err on the side of caution. When in doubt, one should assume that another person is incapacitated and unable to give consent. Being intoxicated or drunk oneself is never a defense to a complaint of sexual misconduct under this Policy.

V. POLICY AGAINST RETALIATION

It is also a violation of ICSW policy to retaliate against any person engaging in protected activity under this Policy. Retaliation is defined as a materially adverse action taken against an individual because of his or her participation in a protected activity under this Policy.

Protected activity includes, but is not limited to, (a) making a good-faith complaint of sexual misconduct, (b) cooperating in good faith in the investigation of a complaint of sexual misconduct, and/or (c) testifying as a witness to any report of sexual misconduct.

Retaliation should be reported promptly to the Title IX Coordinator, the Dean of Students, the Provost and Dean of Academic Affairs, or the Director of Finance and Operations. Acts of retaliation may result in disciplinary action independent of the sanction or interim measures imposed in response to the underlying allegations of sexual misconduct -- and may be the basis for discipline or dismissal.

VIII. ACADEMIC FREEDOM

ICSW is committed to the principles of academic freedom. Rigorous discussion and debate are fundamental to ICSW's educational mission, and this policy is not intended to determine or restrict teaching methods, course content, or the processes of intellectual inquiry and debate. The fact that speech or an expression is offensive is not necessarily a basis to establish a violation of this policy.

REPORTING OPTIONS AND AVAILABLE RESOURCES

There are various reporting options and resources available to the ICSW community. ICSW encourages those who have experienced sexual misconduct to talk to one or more of the individuals or agencies identified below.

A. **Confidential Sources:** The following resources are available to discuss incidents of sexual misconduct in confidence, and generally they only report to ICSW that an incident occurred without revealing any personally identifying information. Disclosures to these entities will not trigger an ICSW investigation into an incident. Faculty, staff and students wishing to obtain confidential assistance without making a report to ICSW may do so by speaking with one of the following confidential sources:

- **Resilience** (773-907-1062)

The following off-campus organizations also provide confidential assistance and additional resources:

- **The Chicago Rape Crisis Hotline:** 888-293-2080
- **National Sexual Assault Telephone Hotline:** 800-656-HOPE (4673)

All the above resources employ professionals specifically trained to work with individuals who

report sexual misconduct and have knowledge about on-and off- campus resources, services, and options. Please note that limitations of confidentiality may exist for individuals under the age of 18.

B. **Reporting to ICSW.** ICSW strongly encourages individuals to report incidents of sexual misconduct to the Title IX Coordinator or other ICSW employee. Except for the confidential resources identified directly above, all other ICSW employees who receive a report of sexual misconduct, including faculty members, are required to report details of an incident (including the identities of both the Reporting Party and Responding Party when available) to the Title IX Coordinator.

The following resources may be contacted to initiate an investigation into an incident of sexual misconduct:

- **The Title IX Coordinator:** Andrea Lucius at titleixcoordinator@icsw.edu or 773-943-6504.
- **The President of ICSW**
- **The Dean of Students:** Karen Bloomberg kbloomberg@icsw.edu.

If you are in immediate danger, **call 911 for the Chicago Police Department. The non-emergency number for the Chicago Police Department is 3-1-1.** The ICSW Title IX Coordinator can also connect you to the Chicago Police Department. See Subsection E below for more information on reporting to law enforcement.

The privacy of all parties involved in a complaint made to ICSW will be respected. Information related to a report of sexual misconduct or harassment will be shared only with those ICSW employees who “need to know” to assist in the investigation and/or resolution of the complaint. All ICSW employees who are involved in the review, investigation, or resolution of a report are required to participate in specific training regarding the safeguarding of private information.

C. **Information Regarding the Rights of Reporting Parties.** Consistent with applicable State and federal law, upon receiving notice of an alleged Sexual Misconduct Policy violation, ICSW shall provide the Reporting Party with a separate written document listing the Reporting Party’s rights and options under this Policy.

D. **Requests for Confidentiality.** If an individual discloses an incident of sexual misconduct to a non-confidential source, but wishes to maintain confidentiality or requests that no investigation into an incident be conducted or disciplinary action taken, ICSW must weigh that request against ICSW’s obligation to provide a safe, non-discriminatory environment for all members of the ICSW community, including the individual who has experienced sexual misconduct. In rare instances, ICSW’s obligation to provide a safe, non-discriminatory learning and working environment may mean that it is not able to honor an individual’s request to refrain from investigation or maintain absolute confidentiality.

ICSW has designated the Title IX Coordinator (Andrea Lucius) to evaluate requests for confidentiality.

When weighing an individual’s request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider the following range of factors to determine whether there is an increased risk that the alleged perpetrator will commit additional acts of sexual

misconduct:

- whether there have been other sexual misconduct complaints about the same alleged perpetrator;
- whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
- whether the alleged perpetrator threatened further sexual misconduct or other violence against the victim or others;
- whether the alleged sexual misconduct was committed by multiple perpetrators;
- whether the alleged sexual misconduct was perpetrated with a weapon;
- whether the alleged sexual misconduct was committed against a minor; and/or
- whether the Reporting Party's report reveals a pattern of perpetration (e.g., via illicit use of drugs

or alcohol) at a given location or by a group.

The presence of one or more of these factors could lead ICSW to investigate and, if appropriate, pursue disciplinary action pursuant to the formal resolution process set forth in this Policy or other ICSW procedures. If ICSW determines that it cannot maintain an individual's confidentiality, ICSW will inform the individual prior to starting an investigation and will, to the extent possible, limit the information shared during the Complaint Resolution Process.

- If none of the above factors is present, ICSW will likely honor the individual's request for confidentiality. If ICSW honors the request for confidentiality, an individual must understand that ICSW's ability to fully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

E. Reporting Incidents to Law Enforcement. ICSW encourages Reporting Parties to report to law enforcement any instances of sexual misconduct that could rise to the level of a crime, and ICSW will assist individuals wishing to do so. A police report must be made before a criminal prosecution can be considered by the local State's Attorney's Office. The chances of successful prosecution are greater if the report to the police is timely.

Reporting Parties have the right to request that law enforcement or the judicial system implement emergency protective restraining orders. ICSW shall assist Reporting Parties who wish to do so. Reporting Parties who receive emergency or permanent protective or restraining orders through a criminal or civil process should notify the Title IX Coordinator. ICSW will work with the Reporting Party and the person who is the subject of the restraining order to manage compliance with the order on campus.

Regardless of whether criminal charges are filed, ICSW will investigate and resolve complaints of sexual misconduct under this Policy where appropriate. Because the standards for finding a violation of criminal law are different from the standards for finding a violation of this Policy, criminal

investigations or reports are not determinative of whether sexual misconduct, for purposes of this Policy, has occurred. Conduct may constitute sexual misconduct under this Policy even if law enforcement agencies lack sufficient evidence of a crime and therefore decline to investigate or prosecute.

ICSW's investigation of a complaint shall proceed simultaneously with any law enforcement investigation, except that ICSW may, in some circumstances, defer the fact-finding portion of its Title IX investigation temporarily while law enforcement investigates. In such cases, the Title IX Coordinator shall inform the parties of the need to defer its fact-finding, provide regular updates on the status of the investigation, and notify the parties when ICSW's fact-finding resumes. During this period, ICSW will take any additional interim measures necessary to protect the Reporting Party and the ICSW community.

F. Medical Assistance. Regardless of whether an individual who has experienced sexual misconduct decides to report an incident to ICSW or law enforcement, individuals are encouraged to seek immediate medical attention from one of the sources listed below to treat physical injuries, test for and treat sexually transmitted infections and pregnancy, and access emergency contraception (if requested).

Under Illinois law, medical personnel are required to alert police when it reasonably appears that the individual requesting the treatment has received an injury sustained as a victim of a criminal offense, including sexual violence. However, it is the individual's choice as to whether they want to speak to the police.

Local medical assistance at a facility with trained sexual assault examiners can be obtained at:

- Northwestern Memorial Hospital, 251 E. Huron Street, Chicago, IL 60611 (312-926-2000)

G. Evidence Collection. Even if an individual has not been physically injured, a timely medical examination is recommended so that forensic evidence can be collected and preserved. An individual may choose to allow the collection of evidence by medical personnel even if they choose not to make a report to the police. To best preserve forensic evidence, it is suggested that an individual not shower, bathe, douche, smoke, or change clothes or bedding before seeking medical attention, and that medical attention be sought as soon as possible. If the individual decides to change clothes, they can bring them unwashed to the hospital or medical facility in a paper bag.

- a. Under Illinois law, forensic medical examinations (i.e., evidence collection) sought after instances of sexual violence are free of charge to the patient.
- b. Individuals who have experienced nonconsensual sexual intercourse or contact, domestic or dating violence, and/or stalking are also encouraged to preserve evidence by saving emails, text messages, instant messages, social networking pages, hard-copy communications, pictures, logs, or other relevant materials establishing facts or chronology.

H. Amnesty for Sexual Misconduct Reporting Parties and Witnesses. ICSW encourages reporting of sexual misconduct and seeks to remove barriers to an individual making a report. ICSW recognizes that individuals who have been drinking or using drugs at the time of an incident may be hesitant to make a report because of the potential consequences of their own conduct. An

individual who reports sexual misconduct, either as a Reporting Party or third-party witness, will not be subject to disciplinary action by ICSW for his or her own personal consumption of alcohol or drugs at or near the time of the incident, provided that any such violations did not or do not place the health or safety of any other person at risk.

I. False Reporting or Testimony. Reports of sexual misconduct that are later found to be intentionally false or made maliciously without regard for truth shall constitute a violation of this policy and subject the Reporting Party violating the Policy to discipline. Likewise, a third-party witness or Responding Party who intentionally provides false or misleading testimony may be subject to disciplinary action under this Policy. This provision does not apply to reports made or information provided in good faith, even if the allegations in the report or information provided are not substantiated by a preponderance of the evidence after the investigation.

INSTITUTIONAL CRIME REPORTING

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the "Clery Act"), requires institutions of higher education to compile and publish statistics on certain criminal offenses including, sexual assault (i.e., non-consensual sexual intercourse), domestic and dating violence and stalking that occur on or adjacent to school properties.

Although ICSW strongly encourages everyone to report any crime that occurs on or around campus, the Clery Act requires certain crimes reported to a Campus Security Authority (CSA) be included in those annual statistics. Specifically, the Act defines a Campus Security Authority as:

- a. A campus police or security department;
- b. Any individual or individuals who have responsibility for campus security but who do not constitute a campus police or security department...such as an individual who is responsible for monitoring entrance into institutional property;
- c. Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses; or
- d. An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings.

All crimes reported and documented under the Clery Act will be recorded in an anonymous manner that neither identifies the specifics of the crime or the identity of the Reporting Party.

ICSW is also obligated to issue timely warnings of Clery Act crimes occurring within relevant geography that represent a serious or continuing threat to students and employees (subject to exceptions when potentially compromising law enforcement efforts and when the warning itself could potentially identify the victim/survivor). A Reporting Party under this Policy will never be identified in a timely warning.

EDUCATIONAL PROGRAMMING

ICSW is committed to offering educational programs to promote awareness of sexual, gender and sexual orientation discrimination, including sexual harassment, non-consensual sexual contact and intercourse, domestic and dating violence, sexual exploitation, stalking and retaliation. Educational programs will include an overview of ICSW's policies and procedures; relevant definitions including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty and staff; and information about risk reduction.

Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation. Returning students and employees will also have ongoing opportunities for training and education.

SEXUAL MISCONDUCT COMPLAINT RESOLUTION PROCEDURES

ICSW provides a prompt, fair, and impartial institutional resolution to reported allegations of sexual misconduct. ICSW's process is separate from the police and courts. Upon receipt of a report or complaint of a violation of ICSW's Sexual Misconduct Policy, the Title IX Coordinator shall review the allegations and determine an appropriate course of action. Options include:

- Resolving the report or complaint through an informal resolution process (if applicable and subject to the parties' agreement);
- Investigating and resolving the report or complaint through ICSW's formal resolution processes; or
- Determining that the facts of the complaint or report, even if true, would not constitute a violation of ICSW's Policy, and closing the case.

Resolution Time Frame. ICSW aims to bring all allegations to a resolution, including the appeals process, within a sixty (60) calendar daytime. This period can be extended as necessary for good cause by the Title IX Coordinator or other ICSW official upon written notice to the parties of the extension and an explanation of the reason for the extension. The parties are regularly notified by the Title IX Coordinator of the status of the proceedings throughout their duration.

Title IX Initial Review and Assessment. Upon receipt of a complaint alleging a violation of ICSW's Sexual Misconduct Policy, the Title IX Coordinator will assess the nature of the report, the safety of the involved individuals and of the campus community, the Reporting Party's expressed preference for resolution and/or request for confidentiality, and the necessity for any interim measures or modifications to maintain the safety of the Reporting Party or the community. If, during this assessment, it is determined that the alleged conduct, even if true, does not constitute a violation of ICSW's Sexual Misconduct Policy, the complaint will be closed and no further action may be taken. Where there is reasonable cause to believe that a violation has occurred, ICSW will proceed as set forth below. In such cases, the Title IX Coordinator shall provide both parties with a written statement of their rights and options under this Policy.

Interim Measures and Resources. Upon receipt of a complaint of alleged sexual misconduct, the Title IX

Coordinator will take prompt and appropriate interim measures and/or provide appropriate interim resources to support and protect the Reporting Party and Responding Party and prevent any further acts of misconduct, harassment, or retaliation prior to the final resolution of the complaint. Interim measures may be imposed regardless of whether formal resolution or interim measures are sought by the Reporting Party or ICSW.

Interim measures and resources may include, but are not limited to:

- Referral to counseling and health services;
- Referral to the Employee Assistance Program (employees only);
- Alteration of Responding Party's (and/or Reporting Party's, if he or she desires) class assignments, academic program, or other academic arrangements;
- Modification of work arrangements and/or scheduling;
- Campus escorts and/or changes to campus transportation arrangements;
- "No Contact Orders";
- Orders barring responding parties from campus or facilities or from use of the institutional server; and/or
- Assistance with seeking medical care, seeking civil protective orders, or filing reports with law enforcement.

Different procedures, interim measures, and interim resources may be utilized and appropriate depending upon the constituency (student, staff, or faculty) of the alleged Responding Party. For instance, where the alleged Responding Party is a student or student organization and considered a threat to persons or property, the Dean of Students may impose interim measures such as suspension and/or loss/cancellation of other privileges prior to or during an investigation and determination. Similarly, where the Responding Party is a staff or faculty member, ICSW may impose interim measures such as temporary suspension from employment or paid or unpaid leave.

Interim measures will be kept confidential to the extent that maintaining such confidentiality would not impair the ability of ICSW to provide the interim measures. ICSW will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims by ICSW and in the community. Students and employees also will be provided with written information about options for requesting changes to academic, living, transportation, and working situations or protective measures, as well as a copy of ICSW's sexual misconduct policy and complaint resolution procedures. They will also be informed that ICSW shall make such accommodations or provide such protective measures if the victim requests them and if the accommodations are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

Violation(s) of a directive and/or protective action issued as an interim measure may result in disciplinary action separate from any sanctions issued for a determination of sexual misconduct and

may form the basis for discipline, including dismissal from the Institute or non-renewal of a faculty contract.

Advisors. The Reporting Party and Responding Party are both entitled to bring an advisor of their choice, at their expense, to any meeting or interview about a complaint of sexual misconduct. The advisor may be a friend, professor, mentor, family member, attorney, or any other supporter a party chooses to advise them, except that individuals who will be serving as witnesses may not serve as advisors.

ICSW cannot guarantee equal advisory rights, meaning that if one party selects an attorney as an advisor, but the other party does not, or cannot afford an attorney, ICSW is not obligated to provide one. However, the role of the advisor is for support only and therefore, non-participatory. In other words, the advisor may not speak for the Reporting Party or Responding Party nor draft any statements on their behalf. An advisor who disrupts or otherwise fails to observe the limits of the advisor role will be asked to leave the meeting, and the meeting will continue without the advisor present. Subsequently, the Title IX Coordinator will determine whether the advisor may be reinstated or replaced.

Both parties shall receive timely written notification of meetings at which they are required to be present. Therefore, ICSW reserves the right to proceed with a pre-arranged meeting or interview regardless of the advisor's availability. Advisors are expected to maintain the privacy of any records shared with them during the process. Such records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by ICSW. ICSW may seek to restrict the role of any advisor who fails to abide by these privacy expectations.

Informal Resolution. Where appropriate, ICSW will work to informally resolve complaints by taking immediate and corrective action to stop the sexual misconduct, address its effects, and prevent recurrence without a formal investigation and determination of Policy violation. Informal resolution may include the range of interim measures set forth above, as well as targeted and/or broad-based training and educational programming for relevant individuals and groups, and/or any other remedy that will achieve the goals of this Policy. In some circumstances, mediation or joint conflict resolution may be appropriate; however, mediation or face to face meetings will not be used to resolve allegations of non-consensual intercourse or contact or other sexual violence. Participation in informal resolution is entirely voluntary and either party can request to end informal resolution and initiate the formal resolution process at any time.

Formal Resolution

1. **Investigation.** When a complaint cannot be resolved through the informal resolution process, or an informal process is not appropriate, a formal resolution will be initiated. Formal resolution includes a prompt, thorough, impartial and fair investigation:

- In most instances, the investigation shall be conducted by the Title IX Coordinator and takes between 20-40 calendar days. Should the Title IX Coordinator have a conflict or it is otherwise determined appropriate, the investigation will be assigned (by the Dean of Students, in the case of a complaint against a student, or by the President, in the case of a complaint against a faculty or staff

member) to an appropriate alternate investigator who has received training regarding the investigation of, and other issues relevant to, non-consensual sexual intercourse and contact, sexual exploitation, domestic and dating violence, stalking, and other misconduct covered by this Policy, including on how to conduct an investigation that protects the safety of victims and promotes accountability, and who does not have a conflict of interest or bias. Parties will be notified, in writing, should the timeline need to be extended to accommodate the investigation.

- Investigations may include one or more interviews with the Reporting Party, Responding Party, and any other witnesses deemed by the Title IX Coordinator (or other investigator) to have potentially relevant information. Investigations may also include the gathering of physical, documentary and/or other relevant evidence. Additionally, Reporting Parties and Responding Parties may provide written statements, identify and/or present statements from fact witnesses, or submit any other evidence that the Title IX Coordinator (or other Investigator) deems relevant. Reporting and Responding Parties may have advisors present when interviewed and at any other meetings with the investigator or ICSW that occur during the investigation. Timely notice shall be provided to Reporting Parties and Responding Parties of all meetings at which they may be present, and both parties will be provided with timely and equal access to information.

- If at any point during the investigation it is determined there is no reasonable cause to believe that ICSW policy has been violated, the Title IX Coordinator has authority to terminate the investigation and close the case with no further action.

2. **Prior Sexual History.** In general, a Party's prior sexual history is not relevant and will not be admitted as evidence during an investigation. However, where there is a current or ongoing relationship between the Reporting Party and the Responding Party, and the Responding Party alleges that consent was given, the prior sexual history between the parties may be relevant to assess the manner and nature of communications between the parties. As noted in this Policy, however, the mere fact of a current or previous dating or sexual relationship, by itself, is insufficient to constitute consent. Any prior sexual history of the Reporting Party with other individuals is typically not relevant and will not be permitted except under very limited exceptions.

- In gathering the facts, the Title IX Coordinator (or other Investigator) may consider prior or subsequent allegations of, or findings of responsibility for, similar conduct by the Responding Party only to the extent such information is relevant.

3. **Investigative Report.** After the investigation has been completed, the Title IX Coordinator (or other Investigator) will prepare a final Investigative Report:

- The report will summarize the evidence collected and analyze the relevant facts determined through the Investigation, referencing any supporting documentation or statements. The final Investigative Report will include summaries of interviews with the Reporting Party, Responding Party, third-party witnesses, and any other individuals with relevant information and will also include credibility assessments as appropriate. Additionally, if such information is available and relevant, the Investigative Report shall include photographs, physical evidence, electronic records, and/or forensic evidence.

- Before the report is finalized and a determination of responsibility has been made, the Title IX

Coordinator shall forward to each party a summary of the party's own interview(s) for review. The Reporting Party and Responding Party may submit any additional comments, evidence, or suggested factual correction to the Title IX Coordinator (or other Investigator) within three (3) business days of the date on which they were provided with their interview summaries. Both Parties will also be provided an opportunity to comment in writing on the investigator's preliminary findings prior to final action upon an investigation report.

- Upon receipt of any additional information or written comments by the Reporting Party and/or Responding Party, or after the three (3) day period has lapsed without comment, the Title IX Coordinator (or other Investigator) will incorporate any additional information and make one or more findings, incorporated into the final Investigation Report, as to whether there is sufficient information to substantiate by a preponderance of the evidence that a Policy violation has occurred. The final Investigative Report will include the determination of responsibility and the rationale for such determination, and these findings shall be reported to the Reporting Party and Responding Party simultaneously. If a finding of Policy violation is made, the report shall also be forwarded to the designated Institute sanctioning official, as set forth in subsection G below, for further proceedings or issuance of sanctions.

4. **Standard of Proof.** The Investigator will determine whether the Responding Party committed a violation of this Policy by a preponderance of the evidence standard. A preponderance of the evidence means whether the information provided during the investigation supports a finding that it is "more likely than not" that the Responding Party violated this Policy.

5. **Sanctions and Remedies.** If the Investigator finds, based on a preponderance of the evidence, that the Responding Party violated this Policy, the final Investigative Report will be forwarded to the appropriate sanctioning official for determination of sanction or further proceedings as set forth below. Each designated sanctioning official shall receive annual training regarding issues related to sexual misconduct as defined in this Policy, as well as sanctioning guidelines consistent with relevant federal law and regulation.

- When the Responding Party is a student, the Dean of Students or designate will determine the appropriate sanction and any other corrective actions.
- When the Responding Party is a faculty member, the Dean of Academic Affairs or designate will determine the appropriate sanction and any other corrective actions.
- When the Responding Party is a staff member, the appropriate sanction and any other corrective actions will be determined by the Director of Finance and Operations.

The disciplinary sanctions for sexual misconduct include:

- verbal or written warning
- mandatory educational programming
- community service
- probation

- “No-contact” orders; orders barring individual from trespassing upon buildings or ICSW’s server or facilities
- removal from programs/activities/leadership positions
- reduction in salary or rank
- suspension from school or employment (with or without pay, in the case of employees)
- dismissal, non-renewal, or other separation from studies or employment at ICSW

Additional corrective actions may also include those accommodations set forth in the *Interim Measures Section* and other broad-based remedial action.

The designated sanctioning official may impose whatever sanction from the above list they believe is fair and proportionate to the finding of sexual misconduct and may consider any record of past violations of this Policy, as well as the nature and severity of such past violation(s), when deciding of sanctions. The sanctioning official shall also determine whether the sanction shall be implemented immediately or will be stayed if a party appeals the determination.

Within five (5) days after receiving the Investigative Report, the sanctioning official will notify both parties simultaneously, in writing, the sanctions issued, the date the sanctions shall be implemented, and relevant information regarding the appeals process. The sanctioning official will also provide a copy of the sanction notice to the Title IX Coordinator.

6. **Withdrawal or Resignation While Charges Are Pending.** Student/Responding Parties with cases pending under this Policy may not withdraw during a proceeding and remain in good standing with ICSW. Rather, should a Student/Responding Party decide to withdraw from ICSW and not participate in the investigation and other portions of the procedures set forth herein, the investigation process will nonetheless proceed in the Student/Responding Party’s absence, an adverse inference may be drawn from the Party’s non-cooperation, and the Student/Responding Party will not be permitted to return to ICSW or regain good standing until any sanctions issued and other appropriate conditions have been satisfied. Likewise, should an employee or faculty member resign during an investigation into his or her conduct and decline to cooperate, the investigation process will be completed nonetheless, an adverse inference may be drawn, and the employee may be barred from further ICSW employment or from the premises pending resolution of the investigation and satisfaction of any sanctions and other appropriate conditions.

7. **Responding Party Failure to Complete Sanctions.** Student-Responding Parties who fail to complete assigned sanctions may be placed on academic hold and prohibited from registering for classes, acquiring transcripts, accessing student accounts, and obtaining grade reviews. Employees who fail to complete sanctions are subject to additional discipline, up to and including separation from employment or non- renewal of faculty position.

8. **Appeals.** Either party may appeal the final Investigative Report determination and/or the sanctions issued by the designated sanctioning official by submitted a written request for appeal, with supporting documentation, to the President of ICSW within five (5) calendar days of the date of the appealing party’s receipt of the final Investigative Report or Notice of Sanctions, whichever is later. Appeals will only be considered on the following three grounds:

- *The existence of procedural error(s) significant enough to alter the outcome;*
- *Existence of new and significant evidence which was not reasonably available at the time of the initial investigation and would likely alter the outcome; and/or*
- *The sanctions imposed are substantially disproportionate to the violation.*

Mere disagreement with the investigation findings is not a basis for appeal.

Within three (3) calendar days of receiving a request for appeal, the President or designate will notify the parties in writing about the filing of the appeal and about whether the notice provides adequate grounds for appeal under this Policy.

If the President or designate decides to consider the appeal, the party who did not initiate the appeal will have five (5) calendar days from the date of notification to submit a written response (and relevant supporting documentation) to the appeal. The President or designate may request other information from the parties and may also consider other information or materials. If the President or designate considers anything that may affect the outcome of the appeal but to which the parties have not had access, the parties will first be provided access and an opportunity to comment in writing upon the additional information.

In any request for an appeal, the burden to demonstrate procedural error, new evidence or disproportionate sanctions lies with the party requesting the appeal. The President or designate may resolve a request for appeal as follows:

- *Deny consideration of the appeal because the reason for appeal does not fall within the three stated grounds for appeal;*
- *Uphold the original finding and/or sanction;*
- *Remand the case to the original investigator for consideration of new evidence and issuance of a new determination;*
- *Appoint a new investigator where significant procedural error may have occurred during the original investigation; or*
- *Refer the case back to the sanctioning official for reconsideration of the sanction (with or without recommendations).*

The President or designate will decide on appeal within ten (10) calendar days of receipt of the appeal materials, including the response of the non-appealing Party and will notify the parties simultaneously in writing of the outcome of the appeal within three (3) calendar days of the date of that determination. In extraordinary circumstances, the timelines set forth in this appeal subsection may be extended by the Title IX Coordinator for good cause. Appeal decisions are final.

Those ICSW personnel involved directly in the investigation and appeal process shall receive training regarding issues related to sexual misconduct as defined by this Policy and guidance for conducting investigations and appeals in a way that protects the rights of all parties and promotes institutional accountability.

9. **Conflict of Interest.** ICSW requires employees participating in the investigation, sanctioning, or appeal processes to disclose any potential or actual conflict of interest. If a Reporting Party or Responding Party believes that any individual involved in the process has a conflict of interest and should not participate, they should communicate this concern in writing to the Title IX Coordinator (or, if the Title IX Coordinator is the individual believed to have a conflict, to the Dean of Students or Director of Finance and Operations).

Where a party believes that the party believes that the sanctioning official has a conflict of interest, a written request to replace the sanctioning official shall be made to the President of ICSW.

In all cases, requests to replace an individual due to conflict of interest must be submitted within three days (3) of a party's notice of the conflicted individual's participation. The written request must include a description of the conflict. If it is determined that a conflict of interest exists, ICSW will address the conflict to ensure an impartial process.

10. **Non-Disclosure Agreements.** ICSW will not require nondisclosure agreements, in writing or otherwise, that would prevent Parties from re-disclosing information related to the outcome of the proceeding or from reporting concerns to an external agency. ICSW will, however, take all reasonable steps to ensure that the Institute itself maintains appropriate confidentiality of investigations and appeals, which ICSW believes to be most conducive to prompt and equitable resolution of complaints and therefore in the best interests of the ICSW campus community.

Student Records - Family Educational Rights and Privacy Act (FERPA)

The following guidance provides eligible students with general information about the Family Educational Rights and Privacy Act (FERPA). This document is a compilation and update of various letters and guidance documents previously issued that respond to a variety of questions about FERPA. While this guidance reflects our best and most current interpretation of applicable FERPA requirements, it does not supersede the statute or regulations.

At the Institute for Clinical Social Work (ICSW), the Office of the Registrar is responsible for maintaining student education records and administering FERPA in accordance with federal law and institutional policy. Students with questions regarding access to or disclosure of their education records should contact the Office of the Registrar.

ICSW reserves the right to update this policy as necessary to remain consistent with changes to applicable federal law, regulations, and institutional practices. FERPA is a federal law that is administered by the Family Policy Compliance Office (Office) in the U.S. Department of Education (Department). 20 U.S.C. § 1232g; 34 CFR Part 99. FERPA applies to all educational agencies and institutions (e.g., schools) that receive funding under any program administered by the Department. Parochial and private schools at the elementary and secondary levels generally do not receive such funding and are, therefore, not subject to FERPA. Private postsecondary schools, however, generally do receive such funding and are subject to FERPA.

Once a student reaches 18 years of age or attends a postsecondary institution, they become an "eligible student," and all rights formerly given to parents under FERPA transfer to the student. The eligible student has the right to have access to their education records, the right to seek the records amended, the right to have control over the disclosure of personally identifiable information from the records (except in certain circumstances specified in the FERPA regulations, some of which are discussed below), and the right to file a complaint with the Department. The term "education records" is defined as those records that contain information directly related to a student and which are maintained by an educational agency or institution or by a party acting for the agency or institution.

FERPA generally prohibits the improper disclosure of personally identifiable information derived from education records. Thus, information that an official obtained through personal knowledge or observation, or has heard orally from others, is not protected under FERPA. This remains applicable even if education records exist which contain that information, unless the official had an official role in a decision that generated a protected education record.

Under FERPA, a school is not generally required to maintain particular education records or education records that contain specific information. Rather, a school is required to provide certain privacy protections for those education records that it does maintain. Also, unless there is an outstanding request by an eligible student to inspect and review education records, FERPA permits the school to destroy such records without notice to the student.

Access to Education Records

Under FERPA, ICSW will provide an eligible student the opportunity to inspect and review their education records within 45 calendar days after receiving a written request. Schools are required to provide an eligible student with copies of education records, or make other arrangements, if a failure to do so would effectively prevent the student from obtaining access to the records. A case in point would be a situation in which the student does not live within commuting distance of the school.

Requests to inspect education records should be submitted to the Office of the Registrar. The Registrar will coordinate access to the requested records in accordance with FERPA and institutional procedures.

A school is not generally required by FERPA to provide an eligible student with access to academic calendars, course syllabi, or general notices such as announcements of specific events or extra-curricular activities. That type of information is not generally directly related to an individual student and, therefore, does not meet the definition of an education record.

Under FERPA, a school is not required to provide information that is not maintained or to create education records in response to an eligible student's request. Accordingly, a school is not required to provide an eligible student with updates on their progress in a course (including grade reports) or in school unless such information already exists in the form of an education record.

Amendment of Education Records

Under FERPA, an eligible student has the right to request that inaccurate or misleading information in their education records be amended. While a school is not required to amend education records in accordance with an eligible student's request, the school is required to consider the request. If the school decides not to amend a record in accordance with an eligible student's request, the school must inform the student of their right to a hearing on the matter. If, because of the hearing, the school still decides not to amend the record, the eligible student has the right to insert a statement in the record setting forth their views. That statement must remain with the contested part of the eligible student's record for as long as the record is maintained.

However, while the FERPA amendment procedure may be used to challenge facts that are inaccurately recorded, it may not be used to challenge a grade, an opinion, or a substantive decision made by a school about an eligible student. FERPA was intended to require only that schools conform to fair recordkeeping practices and not to override the accepted standards and procedures for making academic assessments, disciplinary rulings, or placement determinations. Thus, while FERPA affords eligible students the right to seek to amend education records which contain inaccurate information, this right cannot be used to challenge a grade or an individual's opinion, or a substantive decision made by a school about a student. Additionally, if FERPA's amendment procedures are not applicable to an eligible student's request for amendment of education records, the school is not required under FERPA to hold a hearing on the matter.

Disclosure of Education Records

Under FERPA, a school may not generally disclose personally identifiable information from an eligible student's education records to a third party unless the eligible student has provided written consent. However, there are many exceptions to FERPA's prohibition against non-consensual disclosure of personally identifiable information from education records. Under these exceptions, schools are

permitted to disclose personally identifiable information from education records without consent, though they are not required to do so. Following is general information regarding some of these exceptions.

One of the exceptions to the prior written consent requirement in FERPA allows "school officials," including teachers, within a school to obtain access to personally identifiable information contained in education records provided the school has determined that they have "legitimate educational interest" in the information. Although the term "school official" is not defined in the statute or regulations, this Office generally interprets the term to include parties such as: professors; instructors; administrators; health staff; counselors; attorneys; clerical staff; trustees; members of committees and disciplinary boards; and a contractor, volunteer or other party to whom the school has outsourced institutional services or functions.

For purposes of this policy, school officials may include faculty members, administrators, staff, contracted service providers, and other individuals performing institutional functions who have a legitimate educational interest in the information.

A school must inform eligible students of how it defines the terms "school official" and "legitimate educational interest" in its annual notification of FERPA rights. A school official generally has a legitimate educational interest if the official needs to review an education record to fulfill their professional responsibility. Additional information about the annual notification of rights is found below in this guidance document.

Another exception permits a school to disclose personally identifiable information from an eligible student's education records, without consent, to another school in which the student seeks or intends to enroll. The sending school may make the disclosure if it has included in its annual notification of rights a statement that it forwards education records in such circumstances. Otherwise, the sending school must make a reasonable attempt to notify the student in advance of making the disclosure, unless the student has initiated the disclosure. The school must also provide an eligible student with a copy of the records that were released if requested by the student.

FERPA also permits a school to disclose personally identifiable information from education records without consent when the disclosure is about financial aid for which the student has applied or which the student has received, if the information is necessary for such purposes as to: determine the eligibility for the aid; determine the amount of the aid; determine the conditions for the aid; and/or enforce the terms and conditions of the aid. With respect to this exception, the term "financial aid" means payment of funds provided to an individual (or payment in kind of tangible or intangible property to the individual) that is conditioned on the individual's attendance at a school.

Another exception permits a school to disclose personally identifiable information from education records without consent when the disclosure is to the parents of a "dependent student" as that term is defined in Section 152 of the Internal Revenue Code. Generally, if either parent has claimed the student as a dependent on the parent's most recent year's income tax statement, the school may non-consensually disclose the eligible student's education records to both parents under this exception.

Postsecondary institutions may also disclose personally identifiable information from education records, without consent, to appropriate parties, including parents and/or emergency contacts of an eligible student, about a health or safety emergency. Under this provision, colleges and universities may notify parents when there is a health or safety emergency involving their child, even if the parents do not claim the student as a dependent.

FERPA also permits a school to disclose personally identifiable information from education records without consent when the disclosure is to the parents of a student at a postsecondary institution regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance. The school may non-consensually disclose information under this exception if the school determines that the student has committed a disciplinary violation with respect to that use or possession and the student is under 21 years of age at the time of the disclosure to the parent.

Another exception permits a school to non-consensually disclose personally identifiable information from a student's education records when such information has been appropriately designated as

directory information. "Directory information" is defined as information contained in the education records of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Directory information could include information such as the student's name, address, e-mail address, telephone listing, photograph, date and place of birth, major field of study, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees and awards received, the most recent previous educational agency or institution attended, grade level or year (such as freshman or junior), and enrollment status (undergraduate or graduate; full-time or part-time).

A school may disclose directory information without consent if it has given public notice of the types of information it has designated as directory information, the eligible student's right to restrict the disclosure of such information, and the period within which an eligible student has to notify the school that they do not want any or all of those types of information designated as directory information. Also, FERPA does not require a school to notify eligible students individually of the types of information it has designated as directory information. Rather, the school may provide this notice by any means likely to inform eligible students of the types of information it has designated as directory information.

There are several other exceptions to FERPA's prohibition against non-consensual disclosure of personally identifiable information from education records, some of which are briefly mentioned below. Under certain conditions (specified in the FERPA regulations), a school may non-consensually disclose personally identifiable information from education records:

- to authorized representatives of the Comptroller General of the United States, the Attorney General of the United States, the U.S. Secretary of Education, and State and local educational authorities for audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs;
- to organizations conducting studies for or on behalf of the school making the disclosure for the purposes of administering predictive tests, administering student aid programs, or improving instruction;
- to comply with a judicial order or a lawfully issued subpoena;
- to the victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense

concerning the final results of a disciplinary hearing with respect to the alleged crime; and

- to any third party the final results of a disciplinary proceeding related to a crime of violence or non-forcible sex offense if the student who is the alleged perpetrator is found to have violated the school's rules or policies. The disclosure of the final results only includes: the name of the alleged perpetrator, the violation committed, and any sanction imposed against the alleged perpetrator. The disclosure must not include the name of any other student, including a victim or witness, without the written consent of that other student.

As stated above, conditions specified in the FERPA regulations at 34 CFR § 99. 31 have to be met before

a school may non-consensually disclose personally identifiable information from education records in connection with any of the exceptions mentioned above.

Annual Notification of Rights

Under FERPA, a school must annually notify eligible students in attendance of their rights under FERPA.

The annual notification must include information regarding an eligible student's right to inspect and review their education records, the right to seek to amend the records, the right to consent to disclosure of personally identifiable information from the records (except in certain circumstances), and the right to file a complaint with the Office regarding an alleged failure by a school to comply with FERPA. It must also inform eligible students of the school's definitions of the terms "school official" and "legitimate educational interest." ICSW provides students with annual notification of their FERPA rights through the Student Handbook and other official institutional communications, as appropriate.

FERPA does not require a school to notify eligible students individually of their rights under FERPA.

Rather, the school may provide the notice by any means likely to inform eligible students of their rights. Thus, the annual notification may be published by various means, including any of the following: in a schedule of classes; in a student handbook; in a calendar of school events; on the school's website (though this should not be the exclusive means of notification); in the student newspaper; and/or posted in a central location at the school or various locations throughout the school. Additionally, some schools include their directory information notice as part of the annual notice of rights under FERPA.

Law Enforcement Units and Law Enforcement Unit Records A "law enforcement unit" means any individual, office, department, division or other component of a school, such as a unit of commissioned police officers or non-commissioned security guards, that is officially authorized or designated by the school to: enforce any local, State, or Federal law, or refer to appropriate authorities a matter for enforcement of any law against any individual or organization; or to maintain the physical security and safety of the school. The law enforcement unit does not lose its status as a law enforcement unit if it also performs other, non-law enforcement functions for the school, including investigation of incidents or conduct that constitutes or leads to a disciplinary proceeding against a student.

"Law enforcement unit records" (i.e., records created by the law enforcement unit, created for a law enforcement purpose, and maintained by the law enforcement unit) are not "education records" subject to the privacy protections of FERPA. As such, the law enforcement unit may refuse to provide an eligible student with an opportunity to inspect and review law enforcement unit records, and it may disclose law enforcement unit records to third parties without the eligible student's prior written consent.

However, education records, or personally identifiable information from education records, which the school shares with the law enforcement unit do not lose their protected status as education records because they are shared with the law enforcement unit.

Complaints of Alleged Failures to Comply with FERPA

FERPA vests the rights it affords in the eligible student. The statute does not provide for these rights to be vested in a third party who has not suffered an alleged violation of their rights under FERPA. Thus, we require that a student have "standing," i.e., have suffered an alleged violation of his or her rights under FERPA, to file a complaint. The Office may investigate those timely complaints that contain specific allegations of fact giving reasonable cause to believe that a school has violated FERPA. A timely complaint is defined as one that is submitted to the Office within 180 days of the date that the complainant knew or reasonably should have known of the alleged violation of FERPA. Complaints that do not meet FERPA's threshold requirement for timeliness are not investigated.

If we receive a timely complaint that contains a specific allegation of fact giving reasonable cause to believe that a school has violated FERPA, we may initiate an administrative investigation into the allegation in accordance with procedures outlined in the FERPA regulations. If a determination is made that a school violated FERPA, the school and the complainant are so advised, and the school is informed of the steps it must take to come into compliance with the law. The investigation is closed when voluntary compliance is achieved. Please note that the eligible student should state their allegations as clearly and specifically as possible. To aid us in efficiently processing allegations, we ask that an eligible student only include supporting documentation that is relevant to the allegations provided. Otherwise, we may return the documentation and request clarification. This Office does not have the resources to review voluminous documents and materials to determine whether an allegation of a violation of FERPA is included. An eligible student may obtain a complaint form by calling the Department of Education at (202) 260-3887. For administrative and privacy reasons, we do not discuss individual allegations and cases via email. Please mail completed complaint forms to the Office (address below) for review and any appropriate action.

Complaint Regarding Access

If an eligible student believes that a school has failed to comply with their request for access to education records, the student may complete a FERPA complaint form and should include the following specific information: the date of the request for access to the education records; the name of the school official to whom the request was made (a dated copy of any written request to the school should be provided, if possible); the response of the school official, if any; and the specific nature of the information requested.

Complaint Regarding Amendment

If an eligible student believes that a school has failed to comply with their request for amendment of inaccurate information in education records or failed to offer the student an opportunity for a hearing on the matter, the student may complete a FERPA complaint form and should include the following specific information: the date of the request for amendment of the education records; the name of the school official to whom the request was made (a dated copy of any written request to the school should be provided, if possible); the response of the school official, if any; the specific nature of the inaccurate information for which amendment was requested; and evidence provided to the school to support the assertion that such information is inaccurate.

Complaint Regarding Disclosure

If an eligible student believes that a school has improperly disclosed personally identifiable information from their education records to a third party, the student may submit a complaint as outlined under the Grievance Policy.

This guidance document is designed to provide eligible students with some general information regarding FERPA and their rights, and to address some of the basic questions most frequently asked by eligible students. You can review the FERPA regulations, frequently asked questions, significant opinions of the Office, and other information regarding FERPA at our Website as follows:

www.ed.gov/policy/gen/guid/fpco/index.html

If, after reading this guidance document, you have questions regarding FERPA which are not addressed here, you may write to the Office at the following address:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-8520

Whistleblower Policy

If any employee, faculty member or student reasonably believes that some policy, practice or activity of ICSW is in violation of law, public policy or accreditation standards, that person should file a written complaint with the President, Provost and Dean of Academic Affairs or the Board Chair. That person is protected from retaliation for bringing such an alleged violation to the attention of the President, Provost and Dean of Academic Affairs or Board Chair. ICSW will also not retaliate against an employee, faculty member or student who in good faith discloses or threatens to disclose alleged violations of law, public policy or accreditation standards to a public body or an accrediting organization.

Section 3: Community Expectations

Culture of Care

Purpose

In alignment with the Institute for Clinical Social Work's commitment to clinical excellence, cultural humility, inclusion, and relational learning, this professional learning environment encourages open dialogue that supports reflective practice, critical inquiry, and respectful engagement—especially when exploring complex, sensitive, or emotionally charged material.

Community Expectations

At the Institute for Clinical Social Work, “community” includes everyone who contributes to or participates in our shared learning environment—students, faculty, instructors, staff, alumni, visitors, and community partners. Whether in classrooms, clinical consultations, workshops, trainings, during ICSW events or external events where you represent ICSW, all community members are expected to engage in thoughtful, respectful dialogue that supports our commitment to inclusive and collaborative learning.

Respectful and Professional Engagement

- Engage diverse perspectives with curiosity, openness, and respect.
- Use inclusive, clinically appropriate language and avoid assumptions about identity, lived experience, or clinical practice.
- Maintain academic and professional boundaries in all discussions.
- Recognize discomfort as a meaningful part of learning and professional growth.

Active and Reflective Listening

- Listen to understand before responding.
- Allow others to complete their thoughts without interruption.
- Reflect, paraphrase, or clarify to support shared understanding.

Empathy, Compassion, and Clinical Attunement

- Acknowledge emotional responses without minimizing or dismissing them.
- Respond to peers with care, generosity, and professionalism.
- Attend to signs of distress and check in privately or refer to appropriate resources when needed.

Self-Awareness and Reflexivity

- Monitor emotional reactions and pause before responding.
- Speak your perspective with integrity, responsibility, and respect.
- Reflect on personal biases, positionality, and power in dialogue.
- Remain open to feedback, learning, and correction.

Thoughtful Participation

- Ask questions to deepen understanding and clinical insight.
- Use “I” statements when sharing perspectives or experiences.
- Seek clarification rather than making assumptions or judgments.

Non-Reactivity and Regulation

- Practice pausing and self-regulation when emotions arise.
- Share perspectives without the need to persuade or prove a point.
- It is appropriate to take time to reflect before responding.

Affirming Space and Confidentiality

- Personal disclosures shared is confidential and must not be shared outside the classroom or any other spaces
- This is an affirming space where all voices are valued.
- Be mindful of participation and make space for others to contribute.
- Harmful, discriminatory, or unethical language or behavior is not acceptable.
- Concerns related to bias, safety, or professional conduct should follow ICSW policies and procedures.

Accountability and Professional Growth

- Take responsibility for impact, even when harm is unintentional.
- Engage in ongoing learning related to cultural humility, ethics, and care.
- Recognize differences as sources of insight, perspective, and professional growth.
- Uphold shared classroom norms and address concerns as they arise.

Academic and Professional Integrity Standards and Procedures

I. Introduction

The Institute for Clinical Social Work (ICSW) is committed to fostering a positive, supportive, and respectful learning environment for all students, faculty, and staff. Our Academic and Professional Integrity Standards and Procedures establish clear expectations for student behavior both on and off campus. Adherence to these community standards is essential to maintain professional integrity, academic excellence, and personal responsibility that define the social work and counseling professions.

II. Purpose

This document outlines the standards of behavior for students and the procedures for addressing violations. The Institute expects students to demonstrate honesty, respect for others, accountability, and a commitment to ethical behavior in all academic, professional, and community-related activities.

III. Student Academic and Professional Integrity Standards

The following behaviors are prohibited:

1. Academic Dishonesty

- a. Cheating, plagiarism, or any form of falsification in academic work, including improper use of AI; or uncited or incorrectly cited AI.
- b. Submitting someone else's work as one's own.
- c. Unauthorized use of resources or assistance during exams or assignments.
- d. Falsification of documents or credentials.

2. Unprofessional Conduct

- a. Inappropriate or unethical behavior in internships, field placements, or any other professional settings.
- b. Violations of patient or client confidentiality.
- c. Disrespectful or discriminatory behavior or communications towards peers, faculty, or staff.

3. Harassment and Discrimination

- a. Any form of harassment or discrimination based on race, gender, sexual orientation, disability, religion, or other protected characteristics.
- b. Engaging in bullying, threats, or intimidation, including virtual communications.

4. Substance Abuse

- a. The use of recreational legal or illegal drugs and tobacco products, or the abuse of

alcohol, while engaged in academic or professional activities.

b. Being under the influence of alcohol or other drugs in academic or clinical settings. This prohibition includes prescription drugs used improperly (e.g., those not prescribed for the user).

c. Manufacture, distribution, or possession of recreational legal or illegal drugs or alcohol on campus property or field placement sites.

5. Disruptive Behavior

a. Disrupting the academic environment or any activities related to ICSW.

b. Violations of the ICSW Culture of Care guidelines.

c. Behaviors that disrupt the positive learning environment in class, including failure to uphold netiquette guidelines (including but not limited to improper use of camera or audio settings, behaviors that are not appropriate for a classroom environment).

d. Engaging in violent, threatening, aggressive verbal, written or physical conduct; or in persistent indirect forms of hostile, undermining or intimidating behavior.

6. Failure to Uphold Ethical Standards

a. Violating the National Association of Social Workers (NASW) or the National Board of Certified Counselors (NBCC) Code of Ethics.

b. Failing to adhere to professional standards in both academic and clinical settings.

c. Failure to adhere to field placement or licensure requirements.

7. Firearms, Weapons, Explosives, or Dangerous Substances and Devices

a. Illegal or unauthorized use, possession, or concealment of weapons on ICSW premises or at ICSW activities.

b. Use or brandishing of any item, even if legally possessed, in a manner that harms, threatens, reasonably causes fear, or otherwise endangers any person (including oneself).

8. Theft and Property Destruction

a. Attempted or actual unauthorized taking, misappropriation, possession, retention, or disposal of any property or personal information owned or maintained by ICSW or any member of the ICSW community.

b. Intentional or reckless damage or destruction to, defacing or vandalizing, or tampering with ICSW property or the property of any member of the ICSW community.

IV. Resolution Procedures

Any community member may make a good faith report of a violation of ICSW's community standards by

submitting a complaint through the Academic & Professional Integrity Report Form. This report form is to be used for concerns about potential violations of the Academic and Professional Integrity guidelines (behavioral and/or academic misconduct). Concerns about a student's academic success or progression should be referred to the Progression Committee instead.

The Assistant Academic Dean and the Dean of Students receive the submitted report and initiate the following process:

- The Assistant Academic Dean confirms receipt of report with the complainant (the person who made the report)
- The Assistant Academic Dean, Dean of Students, and Provost and Dean of Academic Affairs review the report in relation to the Academic and Professional Integrity guidelines to determine whether the alleged behavior may constitute a potential violation.
 - If not, the Assistant Academic Dean informs the complainant, and the matter does not proceed through resolution procedures.
 - If yes, the process moves to the next step.

The Academic and Professional Integrity Procedures allow for an informal or formal process, depending on the situation. The Assistant Academic Dean, Dean of Students and Provost and Dean of Academic Affairs make a determination of whether the informal process is appropriate, given the severity of the alleged violation and/or complainant preferences.

In the informal process, both complainants and respondents agree to attempt to resolve the situation without going through the formal process. The informal process typically involves discussions with relevant parties and an agreement between complainant and respondent on educational and/or restorative outcomes.

In the formal process, the Assistant Academic Dean prepares a notice letter for respondent that includes the name of complainant, summary of alleged behavior, possible alleged violations, and that the Academic and Professional Integrity Committee (composed of trained faculty members) will be convened. The Assistant Academic Dean invites the respondent to prepare a written response to share with the committee.

- The Assistant Academic Dean contacts the committee to schedule a time to convene. The committee is provided with the name of the complainant and respondent. In the case of a significant conflict of interest, committee members will not participate.
- Once the meeting is scheduled, the complainant and respondent receive a letter with the date of the committee meeting. The respondent receives a copy of the complaint and any supporting documentation currently. The respondent is reminded that they can provide a written response to accompany the complaint and supporting documentation for review by the committee.
- 24 hours before the committee convenes, the Assistant Academic Dean sends a copy of the complaint, supporting documentation, and respondent response, if received, to the committee members and asks that they review prior to the hearing.
- The meeting is facilitated by the Assistant Academic Dean and includes the committee members, Dean of Students, and the Provost and Dean of Academic Affairs.

- At the meeting, the Assistant Dean of Academic Affairs welcomes the committee and provides a brief review of the committee's process.
 - The Assistant Academic Dean indicates which violation(s) of the academic and professional integrity guidelines are being considered in this matter.
 - The Assistant Den of Academic Affairs reads/describes the complaint.
 - The Assistant Dean of Academic Affairs reads/describes the response.
 - The committee discusses the situation, the evidence provided, and the respondent's response, if any.
 - The committee renders two decisions:
 - First, whether the respondent is responsible for one or more violations of the Academic and Professional Integrity guidelines. The "standard of evidence" is "more likely than not."
 - Second, if so, what are the appropriate outcome(s) of the available options from the policy. The Assistant Academic Dean, Dean of Students, and Provost and Dean of Academic Affairs help to direct this conversation to ensure that it goes according to policy. Restorative justice/remediation is the overarching framework.
 - The committee will vote on these decisions, and 2 out of 3 panel members must be in agreement. The Assistant Academic Dean and Provost and Dean of Academic Affairs do not vote.
 - If the respondent has a prior violation, the Assistant Academic Dean will share a summary of this only after the panel has decided that the student is responsible for one or more current violations. This information may be considered regarding outcomes, but not in determining whether the student is responsible for the current alleged violation(s).
 - The Assistant Academic Dean records the decision of the committee, and the committee is dismissed.
 - The Assistant Academic Dean prepares a letter for the respondent documenting the outcome and sends it to the President for final approval. Upon final approval, the Assistant Academic Dean sends the letter to the respondent.

V. Process Outcomes

These processes are intended to be educational in nature rather than punitive, based on a restorative justice framework.

Based on the investigation and conduct meeting, the following actions may be implemented:

- Remediation: Measures that encourage a student to take responsibility for harm caused, actively work to repair that harm, and/or rebuild trust within the school community.
- Notice for Reflection: A formal written note that documents the violation and the expectation of

future community standards.

- Probation: A defined period during which the student is monitored for compliance with the community standards.
- Suspension: Temporary removal from the Institute for a specific period, with a requirement to meet conditions for return.
- Dismissal: Permanent removal from the Institute in cases of severe or repeated violations.

VI. Appeals

The respondent has the right to appeal to the committee's decision. Appeals must be submitted in writing to the President within 10 business days of receiving the committee's decision. The appeal must be based on one or more of the following grounds: procedural error, new evidence/documentation, or a disproportionately severe outcome.

VII. Conclusion

ICSW students are expected to demonstrate the highest standards of professionalism, ethical behavior, and academic integrity. The Institute is committed to ensuring that all students have the resources and support they need to succeed while also holding individuals accountable for upholding these standards.

Section 4: Master's Program Requirements

MA Program Components Timeline (Full-Time)

Year 1 Fall Term:	Clinical Consultation 1
	Field Placement 1 (Practicum)
Year 1 Spring Term:	Clinical Consultation 2
	Field Placement1, continued (Practicum)
Year 2 Fall Term:	Clinical Consultation 3
	Field Placement 2 (Internship)
Year 2 Spring Term:	Clinical Consultation 4
	Field Placement 2,continued (Internship)
	Case Presentation
	Comprehensive Exam

Time to Completion Policy - MA

Full-Time Students:

Students enrolled in ICSW's MA program as full-time students have 150% of the standard program length in order to complete their degrees. As the standard full-time program is two academic years in length, full-time students have up to three years to complete their degree program under this policy.

Part-Time Students:

Students enrolled in ICSW's MA program as part-time students *for the entirety of their program* have 150% of the standard program length in order to complete their degrees. As the standard part-time program is three academic years in length, part-time students have up to four and one half years to complete their degree program under this policy.

Leaves of Absence and Withdrawal Considerations

Any time that the student has spent on leave of absence or withdrawn (for re-admitted student) must be

included within the time limits to completion outlined in this policy and does not extend the available time to completion. The start date for readmitted students will be considered the time of the student's original enrollment.

Case Presentation

During their final semester of classes, students will present a clinical case to a Case Presentation Panel (consisting of 3 faculty members). Students will complete a detailed case write-up on a client. The write-up will include: identifying information and reasons for referral, background/historical information, a clinical diagnostic formulation, discussion of the treatment plan and process, and discussion of what was learned from the treatment. Included in the case write-up will be two process recordings of all or parts of two sessions. The student will be evaluated on the integration of clinical conceptualization and techniques along with the quality of the written write-up, process recordings, and verbal presentation. The case presentation is 1 credit hour and is assessed using formal evaluation forms on a pass/fail basis. A conditional pass may be assigned if requirements are not fully met, with additional requirements specified to achieve a final pass.

M.A. Clinical Practicum

Each Master's degree student will be assigned a member of ICSW's Faculty to be that student's Clinical Consultant. The student will meet every other week throughout the school year with his or her consultant (*16 total meetings required, 8 per semester*). The purpose of this ongoing consultation is to support the student's ability to integrate the experiences from the Practicum and Advanced Practicum with classroom learning. These consultations will be tracked, and the Consultation Tracking Form (available on the website) must be submitted each semester. Regular attendance is expected. Missed sessions should be rescheduled). MA_Consultations do not include required write-ups; however, the consultation is a pass/fail course. Clinical Consultation with a student's Faculty consultant is a class (CCP 1-4) that is taken every semester that the student is in the MA program. The requirements for this class is to meet at least *8 times a semester (16 times a year)* with the faculty consultant. Process recordings (at least 4 a semester) will be a part of this course. An evaluation must be completed by the consultant at the end of each semester, and the consultant submits a PASS/FAIL grade.

Comprehensive Exam

During a student's final semester, the student will complete a Comprehensive Exam. This exam will consist of a long-answer essay question(s) associated with the coursework component of their training specifically related to both a comprehensive understanding of and the relevance of psychodynamic theory. Students will have three weeks to complete the comprehensive exam.

The comprehensive exam will be reviewed by the committee (3 faculty members?) with a detailed rubric. Members of the committee are appointed by the Provost and Dean of Academic Affairs. Students will be notified in writing of either a Pass or Fail designation by the Committee. A

student who fails the comprehensive examination

may elect to retake the examination a minimum within three weeks after the notification date. A student may attempt the Comprehensive Examination two times. The comprehensive exam is a requirement for graduation but does not receive credit hours.

Field Placement

Field Placement Overall Objectives

Clinical field education is considered a vital component of the MA in Clinical Counseling and Psychotherapy curriculum. ICSW has adopted a concurrent model of field instruction, meaning students take courses and complete the practicum placement at the same time. In addition, while the State of Illinois requires just one Field Placement experience during a counseling master's degree program, ICSW requires two field placements, to further develop and reinforced students' clinical training. Field placement is designed to help students acquire, further develop, and integrate knowledge and practice skills in counseling and psychotherapy. Students will have the opportunity to further enhance and integrate their learning in Field Seminars which meet weekly and are taught by ICSW faculty. Master's students are expected to contribute to their learning through active, constructive participation with peers, staff, and faculty in the field and in the classroom.

Clinical supervision requirements

ICSW requests that training settings provide one hour per week of clinically focused supervision. In addition to supervision students receive at their placements, each student is assigned a member of ICSW's Faculty to serve as a clinical consultant to help each student integrate coursework and practicum learning in a way tailored to each student's learning needs; students will meet with their consultants every other week. The student is required to meet with the consultant 8 times during the semester, 16 times during an academic year.

Finally, students will attend a weekly placement seminar at ICSW.

Credentials of onsite clinical supervisors

At their practicum/field internship sites, MA students must be supervised by persons holding one of the following licenses: LCSW and LCPC or a staff member who has a PsyD.

Employment and Field Placement

Students may be approved to complete a field placement at their place of enrollment as long as the responsibilities for their placement are separate from their responsibilities as an employee.

Expectations for Students: Holidays and Time off

Students are expected to attend their practicum placement during the regular operating hours of the agency. All time off must be approved by the field instructor. Lunch and travel to and from the agency is not counted towards your hours. Students needing days away from their practicum placement for illness or death in the family should immediately notify their Field Instructor and the

ICSW Field Chair. Students are responsible for making up any missed hours.

Liability/Malpractice Insurance

All students registered for practicum placement are covered by ICSW's malpractice insurance.

Role & Responsibilities of Field Instructors

Field instructors are crucial to student learning in the field; each instructor assumes a major role as onsite instructor and supervisor to the student learner. ICSW, in supporting this important function, offers field instructors active support and continuing education training.

The field instructor is responsible for helping students integrate theory and practice, providing support, monitoring student progress, orienting the student to agency personnel, procedures, documentation requirements, providing constructive feedback, consulting with the ICSW Field Chair and/or the Provost and Dean of Academic Affairs and completing and submitting Learning Agreements and Evaluations.

Learning Agreements & Evaluations

At the beginning of a student's internship, field instructors are responsible for completing the learning agreement. In addition, at the end of every semester, field instructors are responsible for doing evaluations of students' performance at the training site. It is requested that the field instructor and student complete both the learning agreements and evaluations collaboratively. The Learning Agreements are due with 30 days of student starting in the placement. First Field Evaluation is due at the end of the first semester. Students are also required to submit monthly tracking logs of their field placement hours.

Performance Issues

Field instructors will notify immediately the Field Chair if the student is performing below expectations.

Field Instructor Orientation

ICSW will provide field instructors with an overview of curriculum and descriptions of courses students are taking.

Process for Resolving Conflicts in the Field

At times, problems arise in professional settings that require additional attention to resolve. We ask that field instructors and ICSW master's students follow the process described below when trying to resolve areas of conflict or concern.

1. Field instructor and student should address the concern or conflict in supervision as part of the supervisory process. The student must inform the Field Chair in advance of any such meeting; ICSW's strong preference is that the Director attend the meeting.
2. If the conflict is not resolved in supervision, either party, the field instructor or student can request a meeting with the Field Chair. The Field Chair will attempt to clarify problem

areas, explore solutions, and work toward a mutually agreed upon plan toward resolution.

3. If the conflict is not resolved with the Field Chair the field instructor or student may request a meeting with ICSW's Provost and Dean of Academic Affairs.

4. At no point are students permitted to decide autonomously to leave a placement or to stop attendance at a placement: doing so violates an agreement that ICSW has made with the training site and may trigger a Student Progression Committee meeting. All decisions about altering or terminating a placement prematurely must be made in conjunction with the Field Chair the practicum site, and ICSW administration.

5. If a student receives a failing grade for a field work evaluation this could result in a Student Progression Committee meeting and possible dismissal from the program. In these cases, the Field Chair and/or the Provost and Dean of Academic Affairs will be in touch with the field instructor for a remediation plan and will be in consultation with the other ICSW Administrative staff to discuss options in terms of plans for the student.

Roles & Responsibilities of Students

Clinical experiences in the field are an essential component of master's students training, providing opportunities for both professional and clinical learning and development. At their practicum placements, students have opportunities to begin applying classroom learning to clinical experiences. Therefore, practicum placement experiences must be top priorities for ICSW students.

Disclosure of Student Status

Students must disclose their student status to clients as a matter of following ethical practice guidelines. It is advisable for students to seek their field instructor's guidelines on introducing this to clients, including:

- how to introduce themselves (trainee, graduate student, counseling student,)
- how to anticipate, think about and respond to questions that clients might raise

Training Requirements

First-Year training sites for the Practicum will provide a two day a week training experience at an agency or community center setting. The First-Year Practicum experience may be clinical, or may be a mix of administrative, case management and clinical support functions that undergird the provision of clinical services. **350 hours are required for the first-year practicum.** While students are responsible for securing their own field placements, ICSW has relationships with several clinical sites in the Chicagoland area and across the country that value working with our students. The Field Chair can suggest placements for students and help them get connected with our resources, if desired.

Second-Year training sites for the Internship will provide a three-days-a-week training experience at an agency or community center setting that will be primarily clinical. **700 hours are required for the second-year internship.** Direct client contact should be more than 50% of the student's total hours

each week, leaving the remaining hours for supervision and paperwork.

If a first-year student is staying on at their current placement for year two of their internship, they can begin to accrue 2nd year placement hours after the following:

- After they have completed their 350 hours and all conditions of their first-year practicum expectations
- After the Spring Semester officially ends
- After they have submitted their 1st year placement evaluation for Spring and have all their practicum hour logs turned in
 - After they have completed and submitted their 2nd year placement documents – contract, goals, etc.
- And only when their placement is able to start to align their duties with what is expected from a 2nd year placement (e.g., face to face clinical hours, if they do not have those yet)

Dress Students are expected to present themselves in a professional manner, including dress, and to follow the practicum placement's/agency's dress code.

Technology and Electronic Communications (*Cell phones, Texting, Email, Laptops, Tablets*)

Student must adhere to their practicum placement's policies regarding cell phone use, emailing clients, texting, and personal laptop or tablet use, or playing personal music, such as through a phone. ICSW students are expected to keep their personal cell phone use to a minimum while at their practicum placements.

To protect clients' confidentiality and maintain professional boundaries, students must strictly follow agency policies regarding use of electronic communication devices and systems, including personal laptops or tablets, flash drive, and email. Students must avoid, at all costs, transferring physically or transmitting electronically any client information, in any form, out of a practicum setting. For example, students may not take home any part of a paper file, nor may a student email client data, nor store client data on anything like a thumb-drive for any purpose, including schoolwork.

An important component of students' clinical learning involves writing case assessments and case studies and presenting clients' cases for clinical discussion. Students are expected to follow their practicum placement's policies on use of client material for learning. The general rule is that all client information must be carefully disguised so no one can readily recognize the individual.

Facebook and Other Social Media Networks

Students must adhere to agency confidentiality policies and professional ethics regarding the use of technology. Providing information on Facebook or other internet social networking systems about practicum placement agencies, personnel, colleagues, or clients is a serious breach of confidentiality and may constitute a Student Progression issue at ICSW. As developing new professionals, students are advised to be extremely careful about their online profiles and postings, and to remove from any publicly available profile any personal material that is not consistent with

developing a new professional identity as a psychotherapist. It is advisable for students to do online searches of themselves periodically to see what information about them is publicly available – for example, in the case of students’ being looked for by a client or potential client – and to take any necessary steps.

Roles & Responsibilities of the Field Chair and ICSW

The ICSW Field Chair holds multiple responsibilities to both students and practicum placements. The Field Chair is the first point of contact for questions and concerns about clinical practicum placements from both students and field instructors and questions about the ICSW curriculum from field instructors. The Field Chair also is the point of contact for problems or conflicts between students and field instructors.

Field Chair Visits

The Field Chair will conduct virtual visit the training site at least once each semester and more frequently if needed.

Field Placement Seminar

Students will attend a weekly placement seminar taught by ICSW faculty. The placement seminar serves a supportive, educational role in helping students integrate their coursework and field experiences, develop self-awareness and insight into clinical work.

Master’s Program Field placement expectations and standards

Performance Issues and conflicts in the field

At times, problems arise in professional settings that require additional attention to resolve. Field instructors and students should follow the process described below when trying to resolve areas of conflict or concern. Note: At no point are students permitted to decide autonomously to leave a placement or to stop attendance at a placement; doing so violates an agreement that ICSW has made with the training site and is a breach of our contract. Leaving a placement without approval may trigger a referral to the Progression committee. If a student desires to alter or terminate the placement early, they need to contact the Field Chair and discuss their reasons for changing placement. Any decision will be made in collaboration with the Assistant Dean of Academic Affairs of Academic Affairs and the practicum or internship site, and ultimately requires administrative approval.

- As part of the supervisory and educational process, any concerns or conflicts should be addressed directly between the field instructor and student.
- If the conflict is not resolved in supervision, the field instructor or student can request a meeting with the Field Chair, who may consult with the Assistant Dean of Academic Affairs or designee.
- If the conflict is not resolved with the Field Chair, the field instructor or student may request a meeting with ICSW’s Assistant Dean of Academic Affairs or designee to further address the situation. The Assistant Dean of Academic Affairs, or designee, will attempt to clarify problem

areas, explore solutions, and work toward a mutually agreed upon plan.

Section 5: PhD Program Requirements

PhD Program Components Timeline (Full-Time)

Year 1:	Clinical Practicum 1 (with advisor/consultant 1)
Year 2:	Clinical Practicum 2 (with advisor/consultant 1)
	Clinical Practicum 3 (with consultant 2)
End of year 2/beginning of year 3:	Case Presentation
Year 3:	Clinical Practicum 4 (with consultant 2)
	Clinical Practicum 5 (with consultant 3) after passing presentation
End of year 3/beginning of year 4:	Qualifying Theory Exam (QTE)
	Advanced Student Status (after passing QTE)

Time to Completion Policy - PhD

Students Matriculating in Fall 2026 and after:

Full-Time Students

Students enrolled in ICSW's PhD program as full-time students beginning in the Fall 2026 term or later have up to 6 years to complete their degrees, inclusive of both coursework and the defense of a scholarly dissertation.

Upon reaching 5 years in the program, students will be contacted by Academic Affairs, and they will be asked to complete a written document that outlines their plan for completing their dissertation prior to the 6 year deadline. Their plan must be approved by their dissertation Chair and will be kept on file with the Progression Committee. It is the responsibility of the Dissertation Chair to complete the Annual Meeting Form to submit updates on the student's progress.

In cases of extenuating circumstances where completion by the 6 year deadline has not been possible, the student will have the option to complete a one time extension request, for up to one additional year. Requests for extension must be submitted prior to the expiration of the student's time-to-degree limit. A final written plan and timeline, agreed upon by the student's chair and approved by the Chair of Progression, will be required and will be the only extension allowed. Should the student not complete their extension plan as outlined, the student will be eligible to cease their studies with the awarding of the Advanced Psychodynamic Clinical Social Work Practice Certificate. The student will be withdrawn from the

PhD program at that time.

At any point, an advanced student who has completed the PhD coursework may elect to withdraw as a PhD student and accept the Advanced Psychodynamic Clinical Social Work Practice Certificate.

Part-Time Students

Students enrolled for the Fall 2026 semester or later in ICSW's PhD program as part-time students for the entirety of their coursework have up to 9 years to complete their degrees, inclusive of both coursework and the defense of a scholarly dissertation. Upon reaching 8 years in the program, students will be contacted by Academic Affairs, and they will be asked to complete a written plan that outlines their plan for completing their dissertation prior to their 9 year deadline. Their plan must be approved by their dissertation Chair and will be kept on file with the Progression Committee. It is the responsibility of the Dissertation Chair to complete the Annual Meeting Form to submit updates on the student's progress.

In cases of extenuating circumstances where completion by the 9 year deadline has not been possible, the student will have the option to complete a one time extension request, for up to one additional year. Requests for extension must be submitted prior to the expiration of the student's time-to-degree limit. A final written plan and timeline, agreed upon by the student's chair and approved by the Chair of Progression will be required and will be the only extension allowed. Should the student not complete their extension plan as outlined, the student will be eligible to cease their studies with the awarding of the Advanced Psychodynamic Clinical Social Work Practice Certificate. The student will be withdrawn from the PhD program at that time.

At any point, an advanced student who has completed the PhD coursework may elect to withdraw as a PhD student and accept the Advanced Psychodynamic Clinical Social Work Practice Certificate.

Students enrolled as part-time for some, but not all, of their coursework, will be subject to the 6 year time limit.

Students Matriculating prior to Fall 2026

Full-Time Students:

Students enrolled in ICSW's PhD program as full-time students prior to the Fall 2026 term have up to 10 years to complete their degrees, inclusive of both coursework and the defense of a scholarly dissertation.

Upon reaching 7 years in the program, students will be contacted by Academic Affairs, and they will be asked to complete a written document that outlines their plan for completing their dissertation prior to their 10 year deadline. Their plan must be approved by their dissertation Chair and will be kept on file with the Progression Committee.

The Progression Committee will keep track of the student's progress in completing their plan as outlined.

Should the student not complete their original plan as outlined and if their original timeline becomes expired, they will be asked to submit a new plan that ensures the completion of their degree prior to the 10 year deadline.

It is the responsibility of the Dissertation Chair to complete the Annual Meeting Form to submit updates on the student's progress.

In cases of extenuating circumstances where completion by the 10 year deadline has not been possible, the student will have the option to complete a one time extension request, for up to an additional on year. Requests for extension must be submitted prior to the expiration of the student's time-to-degree limit. A final written plan and timeline, agreed upon by the student's chair and approved by the Chair of Progression will be required and be the only extension allowed. Should the student not complete their extension plan as outlined, the student will be eligible to cease their studies with the awarding of the Advanced Psychodynamic Clinical Social Work Practice Certificate. The student will be withdrawn from the PhD program.

At any point, an advanced student who has completed the PhD coursework may elect to withdraw as a PhD student and accept the Advanced Psychodynamic Clinical Social Work Practice Certificate.

Part-Time Students

Students enrolled in ICSW's PhD program as part-time students prior to the Fall 2026 term have up to 13 years to complete their degrees, inclusive of both coursework and the defense of a scholarly dissertation. Upon reaching 10 years in the program, students will be contacted by Academic Affairs, and they will be asked to complete a written plan that outlines their plan for completing their dissertation prior to their 13 year deadline. Their plan must be approved by their dissertation Chair and will kept on file with the Progression Committee.

The Progression Committee will keep track of the student's progress in completing their plan as outlined. Should the student not complete their original plan as outlined and if their original timeline becomes expired, they will be asked to submit a new plan that ensures the completion of their degree prior to the 10 year deadline.

It is the responsibility of the Dissertation Chair to complete the Annual Meeting Form to submit updates on the student's progress.

In cases of extenuating circumstances where completion by the 13 year deadline has not been possible, the student will have the option to complete a one time extension request, for up to an additional one year. Requests for extension must be submitted prior to the expiration of the student's time-to-degree limit. A final written plan and timeline, agreed upon by the student's chair and approved by the Chair of Progression will be required and be the only extension allowed. Should the student not complete their extension plan as outlined, the student will be eligible to cease their studies with the awarding of the Advanced Psychodynamic Clinical Social Work Practice Certificate. The student will be withdrawn from the PhD

program.

At any point, an advanced student who has completed the PhD coursework may elect to withdraw as a PhD student and accept the Advanced Psychodynamic Clinical Social Work Practice Certificate.

Students enrolled as part-time for some, but not all, of their coursework, will be subject to the 10 year time limit.

Leaves of Absence and Withdrawal Considerations

Any time that the student has spent on leave of absence or withdrawn (for re-admitted student) must be included within the time limits to completion outlined in this policy and does not extend the available time to completion. The start date for readmitted students will be considered the time of the student's original enrollment.

First-Year Preceptorial

The First-Year Preceptorial is a required monthly one-hour meeting for all first-year PhD students with the Dean of Students. Although no academic credit is awarded, attendance is mandatory because the Preceptorial is considered an important part of students' professional development and experience with their cohort and within the program.

The Preceptorial provides a supportive forum for students to reflect on their experiences in the program, discuss questions or concerns, and receive clarification about program expectations or procedures. It also offers an opportunity to explore the interpersonal and group dynamics that naturally emerge within the student cohort and in relationships between students and with faculty. Students are encouraged to share their observations, offer constructive feedback and suggestions, and raise issues that may enhance the educational experience for themselves and their classmates.

The Preceptorial is part of ICSW's Culture of Care and is intended to foster open communication, mutual support, and a collaborative learning environment. By providing a regular space for dialogue, it helps strengthen the sense of community within the cohort and promotes thoughtful engagement with both the academic and relational aspects of doctoral training.

Advanced Research Seminar

In addition to credit-bearing coursework required for the PhD in Clinical Social Work degree, PhD students are additionally required to participate in ESRM 800: Advanced Research Seminar, upon the completion of their coursework and while in advanced standing status. The seminar meets in a monthly format during Fall and Spring semesters, and functions as a group consultation on the research process. During the registration period for the upcoming semester, advanced students are asked to complete a registration request form for enrollment in the seminar. Advanced standing students are required to enroll in advanced research seminar every semester, and attendance is required, unless the student is on approved leave of absence from their studies (see Leave of Absence Policy).

Advanced Research Seminar dates for the upcoming academic year are communicated by the course

instructors each summer. Advanced Research Seminar will take place once per month in two different time slots. Students may choose to attend either time slot but are asked to consistently attend during that same time slot throughout the academic year to the extent possible.

Students should make every effort to attend Advanced Research Seminar every month. Academic Affairs will review Advanced Research Seminar attendance at the end of each Fall and Spring term, and students who have attended less than two seminars in the previous term will be placed on Academic Probation. Students will have one semester to begin attending regularly and to return to good academic standing. Students who do not return to good academic standing within one semester will be referred to Progression Committee and may be at risk of withdrawal from the program.

PhD Case Presentation

Summary

The purpose of the Case Presentation is to evaluate the student's learning progress in clinical evaluation and treatment and ability to engage in an open discussion with a panel of faculty members. In the Case Presentation, students discuss how their diagnostic and treatment thinking and practice have changed as they have progressed through their clinical education at ICSW. A major part of the Case Presentation is the written and oral discussion of a case, including diagnostic and treatment material, as well as a sample of treatment process. The goal of the presentation is to help students and faculty determine how much the student has learned and what remains to be learned to meet ICSW's clinical practice learning outcomes, which can be found in the Academic Catalog. For a full description of the philosophy of the Case Presentation processes, see the PhD Case Presentation Outline (available online). A premium is placed on the ability and willingness of the student to engage in an open, non-defensive discussion with the case presentation panel. Qualities of self-awareness, forthrightness, clarity and complexity of thought, and ability to link psychodynamic concepts with clinical work are stressed.

Policy

The Case Presentation takes place during the third year of clinical consultation for students matriculating in or after 2014. The case presented must involve a client used to meet Clinical Practicum requirements.^s The presentation may not take place without a review of the student's file and account to ensure all requirements are met.

The case is presented to a panel of faculty, including:

- A chair (either the Clinical Practicum Chair or designee)
- Two members of the full Faculty
- The student's consultant

The role of the consultant in the Case Presentation is to serve as an advisor to the panel. Two of the three panel members must agree on a recommendation. Other students and faculty may be present if the student wishes to invite them. The chair is responsible for arranging a mutually

acceptable time for the presentation and for posting this information for ICSW faculty and student body. The panel reviews the student's current Treatment Consultations and may make suggestions regarding the third Treatment Consultation.

Procedures for Preparing and Conducting a Case Presentation

The following steps are required prior to the Case Presentation:

- The student should utilize the consultant and, if so desired, other faculty members, for help in preparing for the presentation. The student and his/her case consultant concur that a case is appropriate to be used for the Case Presentation and that the write up and accompanying process recording (see Case Presentation Outline in the appendix) are in final draft form and approved by the consultant. The write-up should be no longer than 20 pages long, should conform to the Case Presentation Outline and should be accompanied by an example or examples from process recordings that the student and consultant believe illustrate important aspects of the case.
- The student formally requests a hearing by forwarding the write-up to the Clinical Practicum Chair. **The case must be submitted to the Clinical Practicum Chair for presentation within one year of completion of the consultation.**
- After the Clinical Practicum Chair approves the write-up and progress notes, they contact the Registrar & Director of Academic Services and the VP, Finance and Operation, to request a file review on behalf the student.
- Once the file reviews have been completed and the student is approved by administration to present, the Clinical Practicum Chair asks the student/consultant to provide several dates/times as potential times to present.
- The Clinical Practicum Chair puts out a call to faculty to convene a panel.
- When a panel is identified, the Clinical Practicum Chair assigns a panel chair (when possible, the Clinical Practicum Chair acts as panel chair).
- The Clinical Practicum Chair forwards the write-up, process recordings and a link to the evaluation form that the panel fills out at the end of the presentation to the panel.
- If the presentation is taking place in person, the Clinical Practicum Chair arranges for a classroom and communicates this to the panel and the student.
- If the presentation is taking place in a hybrid or Zoom format, the panel chair creates and sends out the Zoom invitation.

Expectations

Each student's Case Presentation Panel is staffed by different faculty members; therefore, no two Panels will function in the same way. However, there is uniformity outlined here.

Each Case Presentation will last for an hour and a half to two hours and should include some formal presentation by the student with ample time left for free discussion.

It is the Panel chair's responsibility to structure the meeting, and to provide links to the evaluation

forms to the Panel members (the student's consultant does not receive one.)

Process Recording

Students are required to include a process recording of either a single session or two parts of successive sessions in the write up of the case. The write-up should be written in consultation with the clinical instruction on the case. The process recordings should demonstrate a significant piece of work with the client.

Process Presentation

Students are expected to demonstrate clinical competence through the presentation of a selected case, outlining the clinical process. They are also required to participate in a discussion of the treatment process, including critical reflection on the learning issues encountered during their work with the case.

Case Material

The Case Presentation is the student's opportunity to report and convey his or her understanding of how his/her clinical learning has progressed in the program and his/her understanding of a case, treatment process, and ability to work with and discuss clinical material. Flexibility is allowed in how these components are conveyed. However, with respect to case material, the following must be included:

- identifying data
- presenting complaint
- relevant history
- treatment process
- psychodynamic formulation of the treatment process
- overview of the development of the treatment
- a summary of major clinical issues and manifestations of transference and countertransference

The student should work closely with the consultant in preparing the documents for the presentation. Thought should be given to the unique characteristics of the case to be presented and how the student can best convey his or her evolving understanding of the client and the treatment process. Following the presentation, the panel discusses the presentation in dialogue with the student.

At the time of the presentation, the panel may review the student's treatment cases regarding their representation of a broad diagnostic spectrum, and to recommend specific directions to the student for subsequent cases when indicated. The Clinical Practicum Chair may be consulted regarding any recommendations.

Following the presentation, the student is excused from the proceedings while the faculty panel, along with the student's consultant, discusses and evaluates the presentation. Panel members submit written comments and their recommendation on the student's readiness to progress in

the Practicum.

The panel's recommendation must represent a majority of the panel members in attendance. The student's consultant does not vote. The consultant's role is primarily to help the panel in its discussion of the student's clinical work and clinical thinking. The panel's findings are shared with the student following its discussion.

Recommendations may include:

- Approval of the student's progression in the Clinical Practicum case without conditions
- Approval of the student's progression with conditions
- Deferral of the student's progression with specific requirements for remedial work to be completed prior to returning to the committee for another case presentation. The remedial work may include one or more of the following:
 - A special focus in the next case
 - Assignment of an extra case requirement
 - An independent study in the area needing remediation
 - Consultation with a faculty member in a special area of expertise
 - Attention to problems of countertransference (possibly including a suggestion that the student seek personal treatment)
 - Other appropriate recommendations
 - Failure of the student's presentation and referral to the Progression Committee

The decision and recommendations are provided on the evaluation form and placed in the student's record. If the recommendations include specific remediation, the chair of the panel may, in consultation with the student's advisor, appoint an appropriate faculty member to work with the student.

If the student is required to make a second Case Presentation, the same procedures apply as in the first presentation. If the student fails to obtain approval for progression following a second presentation, the matter will be referred to the Progression Committee for a review and further action.

Standards for Case Presentation

- The Panel will examine the development of the student's capacity to function professionally with a client through the effective and creative use of a therapeutically informed and aware self in relationship with the client. This capacity is the educationally expected outcome of the clinical instruction provided to the student within the Clinical Practicum. The Panel will examine the student's academic capacity to conceptualize, write about, and discuss the therapeutic process as well as concepts related to development, psychopathology and technique that informed the treatment

process.

- Students are free to present their case from whatever perspectives, ideas and models which are clinically useful to them, but conceptualizations presented throughout their training within the curriculum will be of interest. The Panel aims to revisit the clinical process to better understand the student's comprehension of the client and the impact of the client on the student's professional self-experience. The Panel also aims to understand the critical thinking used by the student in selecting theory and technique chosen to treat the client. Though it is not expected that students will know the answer to every question, it is expected that the student will demonstrate the capacity to enter reflective consideration and discussion of the points raised.

Case Presentation Evaluation

The following criteria guide the panel in their evaluation of the Case Presentation:

Quality of Written Report

Does the report convey a picture of the client, his/her relevant history and core dynamics, a picture of the client and therapist at work in therapy, and a brief description (to orient the readers) to the clinical theory or theories selected by the student? Does the report meet ICSW writing and style standards?

Quality of Clinical Thinking

Does the student demonstrate an expectable ability to use psychodynamic concepts to clarify his/her thinking about clinical work?

Quality of Discussion with Panel During the Case Presentation

Can the student's verbal presentation, in conjunction with the write-up and process notes, lead to a meaningful discussion with the panel?

Can the student respond openly and thoughtfully to the panel's questions and explore the issues raised by the panel?

Use of Consultation

Has the student established a productive learning alliance with the consultant?

Ph.D. Clinical Practicum

Administrative Oversight: The Chair of the Clinical Practicum shall oversee the Clinical Practicum for all students.

The Clinical Practicum, along with classroom learning, is intended to enhance students' competence in thinking about and doing psychodynamic work. The Practicum provides an experiential learning context which allows concepts and ideas learned in the classroom setting to come alive, with the help of faculty consultants. It is important that students' learning is cross-

fertilized between the Practicum and the classroom. Students are therefore encouraged to raise questions with their clinical consultants about ideas learned in the classroom, and vice-versa. To make maximum use of this process, students must keep pace in the Practicum with the suggested sequence and timing of academic coursework.

The Clinical Practicum is designed as a course, and runs September through August, with write ups, evaluations, and grades due by the end of September of each year for the prior year's consultations. Students who have a midyear start follow an adapted schedule. Practicum for these students runs January through December, with write ups, evaluations, and grades due by the end of January of each year for the prior year's consultations. A failing grade in any practicum consultation will, like a failing grade in a course, result in a referral to the student progression committee, and may eventuate in dismissal from the program.

Students should understand that all consultants work differently, and this may be reflected in different styles, expectations, and theoretical/clinical perspectives. This is a strength of the Practicum, and an opportunity for varied learning experiences. Students are required to ask for clarification about a consultant's expectations if they are at any point unclear.

Students are expected to have a caseload upon matriculation, with some cases that meet at least once weekly. If at any point during the program a student loses their caseload, or is unable to carry cases conducive to learning, the student will be referred to the progression committee and may be placed on academic leave until the situation is remedied.

IF A CONSULTATION IS TERMINATED, THE PRACTICUM CHAIR MUST BE CONTACTED IMMEDIATELY. A terminated consultation may result in a progression review.

Progression through the Clinical Practicum: General Guidelines

Students are encouraged to complete the clinical practicum within concurrent with coursework, although the Clinical Practicum Chair may allow for some flexibility in unique situations, with their approval. All consultations must occur every other week. Meeting weekly with a consultation is not permitted. Final evaluations, write ups, and grades are due by the end of September (January for midyear start of each year for the prior year's practicum). The progression through the Clinical Practicum will occur in the following sequence:

- **First Clinical Practicum:** Students will work with an assigned advisor to complete the 1st year of clinical practicum
- **Remaining Clinical Practicum:** Students will work with ICSW approved consultants of their choice (see Consultant Directory available online) to complete the rest of their clinical practicum
- **Clinical Meetings:** Each clinical consultation will meet from September to August

every other week for a total of 22 meetings over that period. The student meets with two consultants for two years, and with one consultant for one year. Meetings will be tracked, approved by consultants, and submitted to Academic Affairs through the Consultation Tracking Form (on the website) at the end of each semester.

- **Completion of Consultations:** Students are expected to complete their clinical Consultations within the coursework. If a student is unable to maintain this schedule, they must work with the Clinical Practicum Chair to create an alternate plan before the end of the course work.

- **Case Presentation:** occurs during the third year

Issues: If a student experiences any issues with a consultant approving or turning in paperwork or write-ups, they must contact the Registrar & Director of Academic Services immediately. If a consultant experiences any issues with a student missing a meeting or otherwise, they must contact the Chair of the Clinical Practicum immediately.

- All clients for cases must be seen at least weekly. Students are encouraged to see their clients for extended periods of time (e.g., more than a year). All students are encouraged to have treatment experiences in which clients are seen at a frequency of two or more sessions per week; however, there is flexibility for more varied clinical experiences. The requirement for treatment consultation is organized around the time spent with each consultant rather than the time spent with each case.
- Frequency of consultation is every other week. Hours added to consultation more frequent than every other week may not be counted toward consultation hours.
- Students need to work with three different consultants: one for 22 meeting consultations, and two for 44 meeting consultations. The expectation is that this total of five consultations needs to be completed during the student's three years of coursework.

Source of Cases

Since all students are expected to be in practice while in the program, clinical cases are taken from the student's own practice setting. When a student is in private practice, the student carries full administrative and clinical responsibility for the case. When a client is seen within an agency setting or

clinic, that institution maintains clinical and administrative responsibility for the case while ICSW provides clinical consultation for educational purposes. It is the responsibility of the student to obtain permission from his or her agency to use cases in clinical instruction with ICSW's faculty.

All consultants are members of ICSW's faculty. Students are assigned the initial case consultant, who is the student's advisor, prior to the start of classes. After the first Treatment Consultation assignment, students must choose consultants from the roster of approved consultation faculty (the Approved Faculty and Consultant Directory on the website) unless otherwise indicated by

the Student Progression Committee or the Clinical Presentation Panel. If this occurs, the student's advisor will discuss the plan with the student. Students are responsible for notifying the Practicum Chair and Academic Affairs who their consultants are each year.

Responsibilities of consultants in consultation

- The consultant's primary responsibility is to help the student integrate psychodynamic concepts and techniques they are learning in the classroom in the student's work with their clients. Consultants should focus on whether students address psychodynamic principles and concepts in their write-ups.
- Consultants are responsible for communicating with the student's advisor and the Dean of Students if the student is struggling with the integration of psychodynamic principles or concepts.
- Consultants are encouraged to contact their student's prior consultants to share information relevant to the student's learning. Consultants can contact the Assistant Dean of Academic Affairs for a student's prior consultants.
- Consultants should share their evaluations with their students.
- Consultants ensure that students are submitting all required consultation documents and meeting tracking hours.

Responsibilities of students in consultation

It is the obligation of students, when working with consultants in the clinical practicum:

- To come to each appointment prepared. To maintain a regular meeting schedule.
- To act in accordance with professional ethics.
- To provide appropriate notice of the need to cancel or re-schedule consultations.
- To keep track of all hours and dates of consultation meetings, and to submit the Consultation Tracking Form via formstack.
- To submit all write-ups and during the consultation period
- To be the agent of one's own learning

Requesting Changes in Practicum Requirements

All requests must be discussed first between the student and the student's advisor. When considering requests for a change from the usual requirements, the consultant will review the student's current standing in the program, learning needs, and professional development and experience up to the time of the request. Upon approval of the change, the student will contact the Clinical Practicum Chair for formal approval. The approved change should be indicated in writing and added to the student's record by the Registrar & Director of Academic Services.

The First Consultation Experience

Students are assigned their first consultant, and that first consultant serves as that student's advisor until the student selects a dissertation chair. Meetings with the advisor/first consultant should begin immediately in the first semester and should occur every other week. As part of

ending the consultation, the student submits a clinical write-up. The consultant is responsible for completing a full evaluation and signing the student's write-up, plus assigning a final grade of either "Pass" or "Fail." *Even after no longer working as a consultant with a student*, the student's advisor maintains a role with the student as they progress through the program. The advisor monitors the student's learning in the Clinical Practicum by meeting with the student at least each semester to review and to discuss the student's experience. The advisor is also available as a mentor to the student to assist in the many issues that may arise during the time that the student is at ICSW. This is meant as a facilitative, supportive relationship experience. Once a student's dissertation proposal is approved, the student's dissertation chair becomes the student's advisor.

Consultant Reports

Evaluations are an essential part of the consultative learning process. It is assumed that the student and consultant discuss the progress of the work in detail before the consultant writes and signs an evaluation report. The evaluations should be submitted to the Registrar & Director of Academic Services for filing in the student's record. Evaluation forms for treatment consultations/cases must be completed in full, with appropriate write-ups, at the end of each year of consultation. Links to all evaluation forms are available in the appendix and can be found on the ICSW website.

Students' Evaluation of Consultants

Students will be asked to evaluate their consultation learning process with each consultant. The Student Evaluation of Clinical Consultant form can be found in the Appendix of the Student Handbook. Completed forms should be given to Chair of the Clinical Practicum and the Registrar & Director of Academic Services.

Dissertation Process and Procedures

Research Practicum and Dissertation Procedures

The Research Practicum includes the following activities, designed to facilitate completion of a dissertation:

- Ongoing consultation with a dissertation committee
- A dissertation proposal hearing
- Defense of a final dissertation document

Proposal and Dissertation Process

Students are encouraged and supported through their research courses at ICSW to select and develop a dissertation topic by the third year of study. Developing a dissertation is a continuous process of focus and refinement until a dissertation proposal is created to the satisfaction of the student and dissertation committee. During the initial stages of dissertation planning and coursework, the student is encouraged to consult with faculty members about their research topics and ideas. Then, by the end of the third year of study, students should choose their Dissertation Chair and Committee. Dissertation Chairs will help students select the most appropriate faculty

members to invite to serve on their Committee. The Committee provides ongoing guidance to the student from the development of the dissertation through the defense hearing. Opportunities to explore topics and research strategies through outside seminars and other educational experiences are also encouraged.

Student Responsibilities

- All dissertation related documents are to be submitted in accordance with specified timeframes to the required faculty and staff members (e.g., Dissertation Chair and Committee members, IRB Committee, etc). This allows for a thorough review, evaluation, and feedback on dissertation work.
- Follow-through on all recommendations as required by the Dissertation Committee and IRB.
- Adhere to dissertation, IRB and APA Style guidelines.
- Final documents must adhere to ICSW and standard publication guidelines.
- All students conducting dissertation research must become CITI certified.

The Dissertation Committee and Member Roles

The dissertation Committee is comprised of the Dissertation Chair, two committee members, and one reader. The Core Committee includes the Chair and two formal committee members. The Full Committee includes the Core Committee plus one reader. The student chooses all members of the full committee with the guidance of the Dissertation Chair, and all members of the full committee have a vote on the student's progress. All Chairs and Committees must be approved by the Research Sequence Chair and Provost and Dean of Academic Affairs prior to the student's Initial Dissertation Planning Meeting.

The student chooses the dissertation committee within the parameters described here:

1. Two PhD's on Core Committee
2. At least one designated research faculty (see below), who can serve as Chair
3. At least one member, the methodologist, who can guide and help implement a creditable and established research methodology. The methodologist can, and is encouraged to be, the Chair.
4. One reader, who offers a "fresh pair of eyes" on the document. Readers are not part of the ongoing consultations on the student's work but enter the process to review the final proposal draft and final dissertation draft prior to the hearings.
5. Entire committee, including reader, should have core faculty status. Exceptions to this policy are reviewed on an individual basis by the Research Sequence Chair and the Provost and Dean of Academic Affairs when the involvement of a non-core faculty member may be warranted.

All exceptions must be approved by the Research Sequence Chair and Provost and Dean of

Academic Affairs during the committee selection process and may be allowed when a needed area

of knowledge or expertise is currently unavailable among core faculty.

The Dissertation Chair

All dissertation committee Chairs must be approved as “designated research faculty.” Requirements for this designation are:

1. Must have a PhD
2. Must have participated on a minimum of 3 Committees at ICSW or another research institution (as full committee member, not reader)
3. Must have at least one professional publication or presentation at a major conference
4. Must have completed CITI training
5. Must have substantive knowledge of research methodologies
6. Must have full faculty status

ICSW maintains a list of approved research Chairs. Students are free to ask any approved Chair to guide their dissertation work. If a faculty member wishes to apply for approval, they should contact the Research Sequence Chair and Provost and Dean of Academic Affairs. Any exceptions must be approved by the Research Sequence Chair and Dean of Academic Affairs and will only be allowed when there is no available approved Chair.

The Chair has responsibility for:

- Convening all team meetings of the committee with the student, including the Initial Dissertation Planning Meeting and all Annual Dissertation Meetings
- Referring the student to individual committee members to work on specific aspects of their dissertation
- Confirming acceptance of the proposed research by the IRB review committee prior to proposal hearing
- Ensuring the student has requested a file review from the Office of the Registrar before both their proposal and defense hearings
- Ensuring the student has been CITI certified
- General oversight of the dissertation research process
- Adherence to research plan as accepted by the committee
- Ethical conduct of the research
- Chairing the proposal and dissertation hearings
- Addressing concerns that arise among the committee members and the student
- Assuring that any concerns/changes recommended by committee members are in the final document

- Helping the student work with committee members as concerns/changes are addressed
- Ensuring committee members have access to both the dissertation proposal and defense evaluation forms
- Adherence to ICSW policy as outlined in the *Policies and Procedures Manual* and the IRB guidelines

The Dissertation Committee Members

Committee members serve as additional resources to the student representing various areas of expertise relevant to the project. The student is to keep members of the committee apprised of progress of the research, consult as recommended by the Dissertation Chair, and submit drafts of the evolving document when approved by the Dissertation Chair.

The student may request that an individual from another equivalent academic institution be approved to serve on the committee when that individual has the expertise necessary for the dissertation work. Such exception requires permissions of the Chair, the Research Sequence Chair, and the Provost and Dean of Academic Affairs, and will be approved only when equivalent expertise is not available on ICSW's faculty.

The Research Practicum Chair, student's advisor, and research faculty may assist the student to identify faculty members who qualify to serve as dissertation committee members and who have expertise in the particular subject matter or research design areas relevant to the student's topic.

The Dissertation Reader

Readers are considered members of the Full Committee and enter the process on two occasions: 1) prior to the proposal hearing; 2) prior to the final defense. Readers should be considered "a pair of fresh eyes," and though not part of the draft development process, they are voting members at both the proposal hearing and final defense hearing.

Changes in Committee Composition

A student may request changes in the composition of the dissertation committee. This should be done in consultation with the committee Chair. A request should be made by both parties to the Chair of the Research Sequence, who will make the final decision in consultation with the Provost and Dean of Academic Affairs and all parties involved. Changes will be approved only after reasonable efforts to resolve any concerns have been made by all parties.

Only under extreme circumstances may a student request a change in Dissertation Chair. The Chair of the Research Sequence should be consulted about such a request only after the student and committee Chair have exhausted other means to resolve differences, if this is the reason for the change request. The Chair of the Research Sequence will make the final decision in consultation with the Provost and Dean of Academic Affairs and all parties involved.

Institutional Review Board (IRB)

All research conducted under the auspices of ICSW must first be submitted to and approved by the IRB committee. This includes student dissertation research, any research conducted as part of class instruction, research by faculty or staff and outside submission.

Once the student's final dissertation proposal is complete, the student must submit an application to the Institutional Review Board, which reviews all ICSW sponsored research involving human subjects.

The IRB outline for the proposal and the protocol for submitting it must be followed. The outline and protocol are located on the website under Student Resources. This should not be done until the proposal document is complete, as the IRB can request to see the entire document. The IRB must approve the proposed research as meeting standards for protection of human subjects prior to proceeding with any dissertation research activity.

Dissertation Process

The dissertation process unfolds in the following stepwise format:

1. Students are approved to begin consultation on the development of their dissertation projects in the spring semester of their third year following successful completion of Research Methods I, II, and III. At this point, students may consult with various faculty who possess expertise in areas of relevance to the student's project ideas. By the end of the third year, students should, through the process of these consultations, have selected a Chair who will guide them through the early development of a research project and the selection of a full committee. The student's advisor and research faculty may be contacted for advice and recommendations for choosing a Dissertation Chair.
2. Student chooses a Dissertation Chair. The student must submit the Chair Approval Form to the Registrar, who will provide the form to the Research Sequence Chair and the Provost and Dean of Academic Affairs for approval. This will typically happen in the third year of the student's academic work.
3. In conjunction with the approved Dissertation Chair, the student chooses the other two members of the Core Committee and one reader. This typically happens during the third year of a student's academic work with the guidance of the Dissertation Chair. The student must submit the Committee Approval Form to the Registrar and who will provide the form to the Research Sequence Chair and Provost and Dean of Academic Affairs for approval.
4. Once a full committee has been approved, the student and committee (minus reader) will meet as a team for the Initial Dissertation Planning Meeting to discuss a plan, roles (e.g., literature review, methodology), and ways of proceeding. The Chair of the committee will convene this meeting and will be responsible for keeping a record of what is decided. The Chair will submit the Initial Dissertation Planning Meeting form online to the Registrar. This form can be found on the ICSW website under the Resources tab, Forms and Documents subtab, Dissertation section. The student should be working on their dissertation proposal.
5. Once the student's dissertation proposal has been approved by the Dissertation Chair and Committee members, the student, with the guidance of the Dissertation Chair, should complete the IRB application. With the Chair's approval, the student can submit the IRB application and all corresponding required documents.

6. The Chair calls the proposal hearing. No hearing should be held without dialogue between the Chair and the rest of the committee affirming the readiness of the document for a hearing and formal approval of the IRB. The proposal hearing must be approved by the Registrar and Director of Finance and Operations by requesting a dissertation proposal file review, prior to scheduling to ensure that all ICSW requirements are met for holding the hearing. It is the student's responsibility to contact the Registrar and Director of Finance and Operations, to obtain written approval to proceed, after which the Chair may work with the Full Committee to schedule the hearing.
7. In addition to regular meetings/consultations between the student and members of the Core Committee, the student and Core Committee (minus reader) must meet annually (in person or virtually) following the approval of the proposal and until the final defense. The student must be prepared to provide updates about the research at this time. The Chair is responsible for convening the meeting, and for submitting the Annual Dissertation Meeting form to the Registrar as notice that it has occurred. If the student has actively been working on their proposal with their committee, the Chair may elect to hold the annual update meeting with the student, without needing to convene the entire committee.
8. The final dissertation defense must be held within three years of the proposal approval to prevent the aging of data and in alignment with the students required time to program completion. If this deadline passes, the student will need to recollect data and possibly resubmit the proposal for another IRB review and hearing. This decision will be up to the dissertation committee and Research Sequence Chair.
9. Once the student has a final dissertation draft ready for review, it is sent to the Chair for approval. Students should allow 3 weeks for this review. The Chair must provide feedback during that time frame. If grammar editing is required by the Chair in response to the Chair's review, the student may be asked to hire and pay for that editing. Any revisions to the document at this point will add time to the dissertation process.
10. Once the Chair gives final approval to the document, the student sends the document to the other two core committee members. The student should meet with the committee members for feedback and make appropriate changes under the guidance of the Chair. It is also possible (depending on the Chair's direction) that all feedback from the core committee will be given directly to the Chair.
11. Once all three members of the committee concur that the document is ready for defense, the student sends the document to the reader. Final documents may be sent electronically using ICSW's Microsoft system. However, depending on the committee's wishes, a request may be made for the final document to be copied and loose bound for committee members and shipped to the address of their choosing. The student should plan for the committee to have the final document for up to one month prior to the final hearing. The committee, including the reader, must provide feedback to the student during that time.
12. The student must receive approval from the Registrar and Director of Finance and Operations to schedule the defense hearing. It is the student's responsibility to contact the Registrar and Director of Finance and Operations for a file review. They will provide confirmation in writing to the student that they may proceed with a final hearing; the student should share this

approval with their Chair.

13. Students should prepare a final abstract to bring to the final hearing.
14. Passing of both the dissertation proposal and defense requires affirmative votes by three out of four Full Committee members.
15. Both the proposal and final dissertation must be submitted to Turnitin by the Chair prior to the hearings.
16. Faculty and student attendance at both the proposal and final hearings may be in person or virtual when attendees are unable to travel or it is not in the best interest of a student or member of a committee to do so. Any committee person who is absent must provide written commentary on the proposal or dissertation to the student and Chair. It is rare that a hearing can take place without all members present. Students must prepare for this in the timing of their final defense.
17. All dissertations must be written according to the 7th Edition APA Manual from the beginning. Please check the document for style compliance before sending a final electronic copy to the Registrar for uploading to the UMI/Proquest database.
18. Students should be aware of the time required for review, editing, and the approval processes in relation to dissertation work. A dissertation should be in final draft form to give to the Chair three to four months prior to the final defense. The time the process will take after this is variable and will depend on committee feedback, and the quality of the student's work.

Dissertation Proposal and Defense Hearings

Proposal Hearings and final Dissertation Defense Hearings can be held on the following conditions:

1. The student has a full file review with the Registrar and Director of Finance and Operations, who indicate that the student's file is complete, and prerequisites have been met (details below)
2. The full committee, as indicated by the Chair, approves the student's readiness to have a Hearing
3. The student is current with financial obligations to ICSW. The student must have no outstanding financial obligations prior to final Dissertation defense
4. The student is in good academic standing
5. The project has current IRB approval
6. Citi certification for student
7. The student has passed both the Case Presentation and the QTE

File Requirements for Dissertation Defenses:

1. All work in the clinical practicum must be complete
2. Annual meeting form (if committee hasn't met since proposal hearing)

3. Hearing must occur within three years of proposal hearing (to prevent aging of data and in compliance with student Time to Completion requirements)
4. Students may not have any outstanding financial obligations to ICSW

The Proposal Hearing

The proposal is submitted to the student's assigned Dissertation Committee selected by the student and the Chair. These four faculty members hold a hearing with the student and evaluate the proposal. The Full Committee votes to pass, conditionally pass, or fail the proposal. If the proposal is not approved, the student is expected to rewrite it, following the recommendations of the committee, and to present it again at another hearing. If the proposal is conditionally approved, the student is expected to make specific changes recommended and submit them to the committee and reader for approval. If the proposal is approved, the student may proceed with their research. A majority vote of the committee is required for approval. Following approval of a proposal, the Dissertation Committee is responsible for assisting the student in completing the dissertation and for approving or rejecting a completed dissertation.

Function of the Proposal Hearing

- The proposal document is a blueprint of the research project that demonstrates a knowledge of the relevant literature, a question for study or hypothesis to be tested, a sound research plan, and theoretical framework for interpretation of the findings. This should be in publishable form.
- The document is also a contract between the student and the committee defining the area of inquiry, method of study, and general work plan for the project.
- The hearing is an oral presentation of the proposed research in addition to the previously circulated document. It is a public format where committee members and the reader can ask for clarification, raise methodological or epistemological issues and/or general concerns. Any additions or changes delineated by the committee are to be included in a revised proposal document. Depending on the nature of the changes, the document may have to be resubmitted to the committee or the Chair.
- The hearing is an open meeting; however, the student should use discretion when inviting individuals to the hearing and seek approval of the Dissertation Chair.

The Dissertation Defense Hearing

An acceptable dissertation is one that contributes to understanding of a clinical phenomenon or population and to theoretical knowledge, uses sound principles of inquiry, has empirical grounding, and has relevance to clinical social work practice. Scientific and humanistic orientations to knowledge are valued, and a wide range of research approaches are available and acceptable. The student, the Dissertation Committee members and the same faculty who served as the reader for the proposal hearing attend the Dissertation Defense Hearing. The committee members vote to pass with distinction, pass, or fail the completed dissertation and paper. If the dissertation is not approved, the student is expected to rewrite it, following the recommendations of the committee, and to present it again at another hearing. A vote of three (out of four) is required for approval. All

documents must be in a final edited format. If the documents are approved, the student may continue to the final steps in completing the dissertation.

The defense hearing is an open meeting; however, it is a defense of the work and the student should be prepared to answer any relevant question in a thorough, diplomatic, and collegial manner. The student should exercise discretion in inviting guests to the hearing and seek Chair approval. Members of ICSW may attend; family members are not appropriate guests at the hearing.

Final Steps

Following approval of the dissertation, the committee notifies ICSW of their decision through submission of the defense evaluation forms. The student must submit an electronic copy of the approved dissertation (including abstract) to the Registrar after having made any required corrections or revisions. The 7th Edition of the APA Manual should guide the student in completion of the final form of the dissertation. The Registrar will submit the student's dissertation for UMI/Proquest Dissertation Publishing on the student's behalf.

Qualifying Theory Exam

Purpose

A Qualifying Theory Exam (QTE) is part of the ICSW assessment of student learning along with the Dissertation and Case Presentation. Students who matriculated before 2017 will work on the Qualifying Theory Exam during their fourth year and will submit it by the end of Spring semester of that year.

Students who matriculated in 2017 and after will work on the Qualifying Theory Exam during their third year and will complete it in the form of a presentation and faculty panel dialogue in the Fall following their final summer of coursework. The QTE provides a measure of each student's ability to meet the standards of academic scholarship that are consistent with the goals of the Conceptual Foundation Sequence and are consistent with the academic discipline of clinical social work. To take the Qualifying Theory Exam, students will need to have completed all theory courses, completed the first year Research Sequence courses, passed their Case Presentation, and have no outstanding financial balance with ICSW.

Format

The QTE may vary in format from year to year, but the basic format will entail an oral response to questions formulated by the QTE Committee. An oral discussion will be required between the student and a QTE panel (comprised of Conceptual Foundations faculty), based on the student's responses to the exam prompts. Students will prepare for the Qualifying Theory Exam during their third year by working with a theory mentor (who is assigned the summer prior to the third year of coursework) and being enrolled in the Capstone theory course. The oral discussion with a faculty panel provides an assessment of the student's ability to articulate verbally, their conceptual learning in the program, as consistent with the goals of the Conceptual Foundations Sequence and ICSW's mission of training scholars.

Evaluation Process

An evaluation instrument for the QTE is developed by the Conceptual Foundations Chair in consultation with the QTE Committee, ICSW Institutional Researcher, and the Dean. The student must pass the QTE to proceed to the dissertation proposal hearing. The evaluation instrument is used to assess the student's written, if applicable, and/or oral success at demonstrating they have met ICSW's standards for academic scholarship. It addresses the degree of conceptual understanding demonstrated, the degree of complexity of thinking, and the quality and clarity of conceptualization related to the theories taught at ICSW (Freud, British Object Relations, Self Psychology, and Relational Theory).

A QTE panel comprised of Conceptual Foundations faculty and assigned by the Chair of the Conceptual Foundations Sequence will evaluate the student's oral presentation and discussion. The student will have two opportunities to successfully pass any written and/or oral exam. The student will be advised that they cannot proceed with the dissertation proposal until passing the full QTE exam. Upon the first failure to pass the QTE, the student's panel will recommend a remediation plan, with the approval of the Conceptual Foundations Sequence Chair, which may include tutoring, writing, and/or re-presenting certain sections of the QTE, or retaking the exam in total within a specified period of time.

If the student does not pass the QTE exam a second time, a referral is made to the ICSW Progression Committee. The Progression Chair reviews the referral and any related student record, may request additional materials and/or consultations with relevant parties for their input. The Progression Chair/Committee determines whether to proceed with further remediation planning and/or evaluate the student's progress and status in the program. The Progression Chair/Committee, with the approval of the Provost and Dean of Academic Affairs, may refer the student back to the QTE Committee with feedback for another remediation plan and retake of the exam. All students must successfully pass the QTE exam and meet the standards set and evaluated by the Conceptual Foundations faculty in order to graduate from ICSW.

Student Support for the QTE

Each student will be assigned a member of the Conceptual Foundations faculty as their Theory Mentor for consultation on the preparation for the QTE. This assignment will occur in the student's third year. It will be the student's responsibility to schedule monthly meetings with the Mentor in order to prepare for the QTE throughout the final year of coursework. Students will have a Capstone Theory review course in the spring of their third year to further prepare for the QTE in the Fall semester.