Universidad Central del Caribe	**Policy#**	**UCC-EO-02-2026**
	Contact	Office of the President
Anti-Discrimination and Discrimination-Free Environment Policy	Last Reviewed/Updated	2026
	Approval By	President

Anti-Discrimination and Discrimination-Free Environment Policy[1]

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[1] **Drafting and Review Statement**
This Policy was developed through a review of applicable laws, regulations, institutional policies, accreditation standards, and other relevant guidance. Drafting support tools, including artificial intelligence-assisted technology, were used to assist with the preparation of preliminary text, organization, and formatting. All content was subsequently reviewed, edited, fact-checked, and approved by UCC's responsible officials, legal counsel, and Board of Trustees. UCC assumes full responsibility for the contents of this Policy.

I. Purpose

Universidad Central del Caribe, Inc. (UCC), accredited by the Middle States Commission on Higher Education (MSCHE), is a pioneering institution in health education, distinguished by its three specialized schools: the School of Medicine (SoM), the School of Chiropractic, and the School of Health Sciences. UCC's SoM, founded in 1976, was the first private not-for-profit medical school in Puerto Rico. It is accredited by the Liaison Committee on Medical Education (LCME) and is recognized for its commitment to clinical excellence, compassion, and empathy, with a strong emphasis on community service and humanistic care. Its graduates are respected leaders across the United States, making a meaningful impact in economically challenged communities. The School of Chiropractic houses the first and only accredited bilingual chiropractic program outside the U.S. mainland, having earned accreditation from the Council on Chiropractic Education (CCE-USA). The program prepares professionals with competencies in leadership, human connection, and holistic health, integrating data-driven practices and interprofessional collaboration. The School of Health Sciences produces outstanding healthcare practitioners equipped with skills in stewardship, kindness, and counseling. It offers Puerto Rico's only substance abuse counseling program, including a Post-Baccalaureate Certificate and a Master's Degree in Health Sciences with a focus on Substance Abuse Counseling. Additionally, UCC hosts the island's first and only bilingual Fellowship in Addiction Medicine for primary care physicians, a one-year clinical training program that prepares physicians to deliver integrated, evidence-based care for substance use disorders in diverse settings. UCC's unwavering commitment to addressing critical public health needs with cultural and linguistic sensitivity continues to shape the future of healthcare throughout the region and in communities with comparable needs.

UCC is committed to maintaining an educational, employment, clinical, research, and service environment free from discrimination and retaliation. Consistent with its mission, institutional values, accreditation obligations, and legal responsibilities, UCC prohibits discrimination based on any legally protected characteristic and seeks to ensure equal opportunity and fair treatment for every member of its community. UCC recognizes that a discrimination-free environment is essential to academic excellence, professional development, patient care, research integrity, workplace effectiveness, and the well-being of students, faculty, employees, residents, fellows, and all members of the institutional community.

This Policy establishes the responsibilities, standards, procedures, reporting mechanisms, review procedures, corrective actions, and institutional safeguards designed to maintain a discrimination-free environment throughout UCC and to support compliance with applicable laws, regulations, accreditation standards, and institutional requirements.

II. Applicability

This Policy applies to all members of the UCC community, including, but not limited to:

- Students;
- Residents and fellows;
- Employees;
- Faculty members, whether full-time, part-time, adjunct, visiting, or ad honorem;
- Administrators;
- Members of the Board of Trustees;
- Consultants;

- Contractors;
- Vendors acting on behalf of the institution;
- Visitors participating in institutional activities
- Applicants for admission;
- Applicants for employment; and
- Volunteers.

This Policy applies to all institutional functions, including, but not limited to:

- Student services;
- Graduate medical education;
- Academic programs;
- Clinical education;
- Research activities;
- Continuing education;
- Committee participation;
- Institutional events;
- Remote educational or employment activities;
- Admissions;
- Recruitment and employment;
- Student organizations;
- Electronic communications; and
- Any environment where University-related activities occur.

III. Definitions

The following definitions apply throughout this Policy.

Discrimination
Discrimination means unequal, adverse, exclusionary, or unfavorable treatment based upon a protected characteristic that interferes with an individual's access to educational opportunities, employment opportunities, institutional services, programs, benefits, privileges, participation, advancement, or professional development.

Retaliation
Retaliation means any adverse action taken against an individual because that individual:

- Reported discrimination;
- Participated in an investigation;
- Assisted another individual in reporting concerns;
- Requested a reasonable accommodation; or
- Exercised rights protected by this Policy or applicable law.

Protected Characteristics
Protected characteristics include:

- Race;
- Color;
- Religion;
- Sex, including pregnancy, childbirth, and related medical conditions;
- Sexual orientation;
- Gender identity;
- Gender expression;

- National origin;
- Age;
- Disability;
- Military or veteran status, including past, present, or future service in the Armed Forces of the United States;
- Marital status;
- Social condition;
- Political affiliation;
- Political beliefs;
- Religious beliefs;
- Status as a victim or perceived victim of domestic violence;
- Status as a victim or perceived victim of sexual assault;
- Status as a victim or perceived victim of stalking;
- Protective hairstyles;
- Hair texture; or
- Any other category protected by applicable federal, state, territorial, or local laws.

IV. Anti-Discrimination Standards and Procedures

A. Policy Statement

The University is committed to maintaining a discrimination-free environment and shall conduct its educational, employment, clinical, research, and service activities in a manner consistent with principles of fairness, equal opportunity, dignity, professionalism, and respect.

UCC is committed to ensuring a discrimination-free environment for all students, residents, fellows, faculty, administrators, employees, job applicants, volunteers, contractors, visitors, and other members of the University community, regardless of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions; sexual orientation; and gender identity), national origin, age, disability, military or veteran status (including past, present, or future service in the U.S. Armed Forces); marital status, social condition, political affiliation, political or religious beliefs; being a victim or perceived as a victim of domestic violence, sexual assault, or stalking; wearing protective hairstyles or having certain hair textures; or any other category protected under applicable federal and local laws.

B. Prohibited Conduct

The following conduct is prohibited under this Policy:

- Discrimination based upon any protected characteristic;
- Conduct that creates a discriminatory, intimidating, or offensive educational or work environment;
- Exclusion from educational, employment, research, clinical, or service opportunities because of a protected characteristic;
- Denial of benefits, resources, services, accommodations, or institutional privileges based upon a protected characteristic;
- Retaliation against a person who reports discrimination, participates in an investigation, or exercises rights protected by this Policy; and

- Aiding, encouraging, directing, or knowingly permitting conduct that violates this Policy.

C. Scope of Prohibited Conduct

Discrimination and retaliation are prohibited regardless of whether they occur between:

- Students and students;
- Patients and students, or other members of the clinical staff;
- Residents and residents;
- Faculty and students;
- Employees and employees;
- Supervisors and employees;
- Visitors and members of the University community; or
- Any other individuals.

D. Equal Opportunity Commitment

UCC shall ensure equal opportunity and equal access in all institutional activities, including but not limited to:

- Student organization participation;
- Admissions and recruitment;
- Grading and advancement;
- Scholarships and financial assistance;
- Clinical assignments;
- Faculty appointments;
- Academic evaluations;
- Research participation;
- Committee appointments;
- Hiring and employment;
- Compensation and benefits;
- Promotions and transfers;
- Professional development opportunities;
- Leadership opportunities; and
- Access to facilities, services, programs, and resources.

Institutional decisions shall be based upon qualifications, merit, academic achievement, professional conduct, institutional needs, and job-related or educationally relevant factors.

E. Reasonable Accommodations

The University shall provide reasonable accommodations for qualified individuals with disabilities and for sincerely held religious beliefs, observances, and practices, unless doing so would impose an undue hardship on the institution.

Requests for accommodation shall be reviewed through the appropriate institutional process and in accordance with applicable law and University procedures.

Nothing in this Policy requires UCC to approve accommodations that fundamentally alter essential educational, clinical, or employment requirements or impose an undue burden upon the institution.

V. Reporting and Resolution Procedures

A. Reporting Concerns

Any person who believes they have experienced, observed, or become aware of discrimination or retaliation is encouraged to report the concern promptly.

Reports may be made to:

- Immediate supervisor;
- Program Director;
- Dean of Student Affairs;
- Academic Dean;
- Office of Human Resources; or
- Any institutional official designated to receive such reports.

Reports may be submitted verbally, electronically, or in writing.

Good-faith reporting is encouraged irrespective of whether the concern is ultimately substantiated.

B. Review and Investigation

The University shall review and respond to reports promptly, fairly, and impartially.
As appropriate, a review or investigation may include:

- Interviews with involved parties;
- Consultation with relevant administrators;
- Collection of documentary evidence;
- Examination of institutional records;
- Review of relevant communications; and
- Other measures deemed necessary to evaluate the reported concerns.

All reviews shall respect due process rights and shall be conducted with appropriate regard for privacy and confidentiality.

Confidentiality shall be maintained to the maximum extent possible consistent with the University's obligation to investigate and address alleged misconduct.

C. Interim Protective Measures

When appropriate, UCC may implement interim measures designed to protect affected individuals and preserve the integrity of a review or investigation.

Such measures may include:

- Academic accommodations;
- Workplace accommodations;

- Schedule adjustments;
- Changes in committee assignments;
- Modification of reporting relationships;
- Temporary separation of involved parties; or
- Other reasonable protective measures.

The implementation of interim measures does not constitute a finding of wrongdoing.

VI. Corrective Actions, Enforcement, Due Process, and Appeal

Where a violation of this Policy is substantiated, the University may impose corrective or disciplinary action consistent with applicable institutional policies and procedures.

Corrective action may include:

- Counseling;
- Educational interventions;
- Mandatory training;
- Written warnings;
- Performance improvement requirements;
- Dismissal from academic programs;
- Removal from institutional assignments;
- Suspension;
- Termination of employment; or
- Any other appropriate institutional action.

The nature of corrective action shall be proportionate to the severity, frequency, and circumstances of the violation.

VII. Training and Dissemination

The University shall communicate this Policy throughout the institutional community.

The Policy shall be:

- Made available to employees and students;
- Published on institutional websites;
- Referenced in institutional handbooks;
- Included in orientation activities;
- Communicated through educational and training programs; and
- Reviewed periodically to ensure awareness and compliance.

Students, employees, faculty, and administrators shall receive appropriate information regarding rights and responsibilities under this Policy.

VIII. Recordkeeping, Audit Trail, and Retention

Records related to reports, reviews, investigations, findings, corrective actions, accommodations, and training conducted under this Policy shall be maintained by the appropriate institutional office.

Records shall be retained in accordance with applicable legal requirements, accreditation expectations, and institutional record-retention policies.
Access to records shall be limited to individuals with a legitimate institutional need or legal authority.

IX. Non-Retaliation

Retaliation is strictly prohibited.

No person shall be subjected to intimidation, threats, coercion, adverse treatment, interference, or discrimination because that individual:

- Reported a concern in good faith;
- Participated in an investigation;
- Assisted another individual in reporting a concern;
- Requested a reasonable accommodation; or
- Exercised rights under this Policy.

Any act of retaliation constitutes an independent violation of this Policy and may result in disciplinary action.
A report made in good faith shall not result in adverse action merely because the allegation is not substantiated.

Knowingly false or malicious reports, however, may constitute misconduct and may be subject to corrective action.

X. Public Disclosure

UCC shall make this Policy publicly available through appropriate institutional channels, including the University's website, student and employee handbooks, orientation materials, and other official publications.

The University may disclose information regarding compliance with this Policy when required by law, governmental reporting obligations, court order, accreditation standards, or other legitimate institutional purposes, while maintaining confidentiality to the extent permitted by applicable law.

XI. Policy Administration

The Office of the President or the President's designee shall serve as the Policy Owner and shall be responsible for:

- Interpretation;
- Implementation;
- Training coordination;
- Oversight of compliance;
- Record maintenance;
- Periodic review; and
- Recommendations for revision.

The Office of Human Resources shall support the implementation and administration of this Policy.

The Policy Owner shall coordinate implementation with Student Affairs, Academic Affairs, Institutional Compliance, Legal Counsel, and other institutional offices as appropriate.

This Policy shall be reviewed no less frequently than every two years or whenever changes in applicable law, accreditation requirements, or institutional operations warrant revision.

XII. Severability

If any provision of this Policy is held invalid, the remaining provisions remain in effect.

XIII. Adoption

Reviewed by:
Chief of Staff and Vice President for Presidential Affairs
Date: August 2026

Approved by:
President
Date: 8/2026