

HOWARD UNIVERSITY POLICY

Policy Number: 400-015 Governance, Risk and Compliance

Policy Title: SANCTIONS AND PROGRESSIVE DISCIPLINE POLICY

Responsible Officer: Chief Compliance Officer

Responsible Office: Office of Compliance

Effective Date: September 24, 2026

I. POLICY STATEMENT

Howard University is committed to maintaining a culture of integrity, accountability, and fairness in the administration of its policies. The *Sanctions and Progressive Discipline Policy* establishes a framework for the application of sanctions and progressive discipline when faculty or staff violate University policies, ensuring that disciplinary actions are consistent, transparent, proportionate to the violation, and aligned with applicable laws, regulations, and accreditation standards.

Howard University will apply sanctions and progressive discipline for policy violations in a manner that is fair, consistent, and proportionate to the nature of the violation. Disciplinary steps may include verbal counseling, written warnings, suspension, demotion, termination, or other actions as outlined here and in other applicable University policies and handbooks.

As a general principle, progressive discipline aims to correct behavior, not to punish, through escalating interventions in response to violations of University policies and procedures. However, in certain instances, it may be necessary to bypass progressive steps in response to misconduct involving safety risks, ethics, discrimination, harassment, criminal behavior, or other serious violations. Therefore, the university may skip steps in a progressive disciplinary process or enact immediate discipline in severe cases, as outlined below. Specific sanctions for policy violations will be determined in consultation with appropriate University offices, including Human Resources, the Office of the Provost, and other relevant governance bodies, as applicable.

I. RATIONALE

As stated in Howard University's *Policy on Policies*, University policies are developed, updated and made accessible to all relevant HU stakeholders and operating units to: (1) ensure the orderly, effective and efficient operation of the University; (2) ensure compliance with policy objectives; and (3) establish the accountability of operating units and individuals affected by each policy. Failure to follow approved University policies undermines these efforts and may result in disciplinary action, up to and including termination of employment. Through the *Sanctions and Progressive Discipline Policy*, the University seeks to advance fairness, consistency, integrity, and

accountability across the University community, while also ensuring compliance with relevant employment law, federal mandates, collective bargaining agreements, and accreditation standards.

II. ENTITIES AFFECTED BY THIS POLICY

This policy applies to all Howard University faculty and staff. To the extent that this policy imposes additional, increased, or different sanctions than those described in the *Faculty Handbook*, *Title IX Policy*, or an applicable collective bargaining agreement, those policies and agreements will control.

FACULTY, UNION REPRESENTED AND HOWARD UNIVERSITY HOSPITAL EMPLOYEES: If provisions of the *Faculty Handbook*, *Employee Handbook*, *Hospital Handbook* or collective bargaining agreement address specific sanctions for particular violations, the *Faculty Handbook*, *Hospital Handbook*, or collective bargaining agreement prevail for faculty and other employees covered by the respective document.

III. DEFINITIONS

- A. Sanctions:** Corrective or disciplinary actions imposed in response to violations of University policy or other regulations, ranging from informal counseling to termination of employment.
- B. Progressive Discipline:** A structured process of escalating corrective action designed to provide employees with notice of misconduct or performance issues and an opportunity to improve, except in cases of misconduct warranting bypassing progressive steps.
- C. Policy Violation:** Conduct or omissions inconsistent with University policies, procedures, codes of conduct, or other regulations including, but not limited to, the *Code of Ethical Conduct*, *Research Misconduct Policy*, *Title IX Policy*, *Nondiscrimination Policy and Procedures*, *Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Violations/Sanctions Policy*, and *Student Privacy Rights Policy*.

IV. POLICY PROCEDURES

A. Disciplinary Authorities

1. The **Provost, Dean or Department Chair** is the Disciplinary Authority for faculty.
2. The **Employee Relations** team in the Office of Human Resources is the Disciplinary Authority for staff.
3. The **Office of Human Resources** (particularly Employee Relations and EEO) handles enforcement of discipline and sanctioning for most employment-related violations (e.g., ethics, bullying, time fraud, conflicts of interest), as well as violations of the *Non-Discrimination Policy and Procedures*.

4. The **Title IX Office** leads investigations and sanctioning for violations of the *Policy Prohibiting Sex and Gender-Based Discrimination, Sexual Misconduct and Retaliation*.
5. The **Chief Privacy Officer** in the Office of Compliance leads investigations and sanctioning for violations of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and related University privacy and security policies and procedures, in accordance with the *Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Violations Policy*.
6. The **Research Integrity Officer (RIO)** and the **Committee on Research Misconduct** lead investigations and sanctioning for research misconduct, in accordance with the Research Misconduct Policy.

B. PROGRESSIVE DISCIPLINE AND SANCTIONS: STAFF

As an at-will employer, Howard University has the right to terminate the employment relationship at any time for any lawful reason or no reason, as does the employee. However, the University endeavors to avoid the need for discipline or termination, providing a process by which an employee may be made aware of performance and/or conduct issues, and if possible, be provided an opportunity for improvement. **The progressive discipline process for University staff is described in detail in Section 12 of the *Howard University Employee Handbook* (“Discipline and Termination”), which can be found at: <https://secretary.howard.edu/resources/employee-handbook>.**

C. PROGRESSIVE DISCIPLINE AND SANCTIONS: FACULTY

The principles and procedures governing the handling of faculty allegations, sanctions, and appeals are intended to ensure clear communication, provide graduated opportunities for correction and improvement, and facilitate timely resolution of disciplinary matters to support the University’s work and community. **The grounds, procedures, and processes for disciplining faculty members, including administrators holding faculty positions, is described in detail in Chapter E of the *Faculty Handbook* (“Disciplinary Matters”), which can be found at: <https://secretary.howard.edu/resources/faculty-handbook>.**

D. SEVERE VIOLATIONS & BYPASSING PROGRESSIVE STEPS

1. Certain violations *may* warrant immediate sanctions or dismissal, bypassing prior warnings—including, but not limited to:
 - a. discrimination, harassment, or retaliation under EEO or Title IX;
 - b. HIPAA privacy or security breaches;
 - c. research misconduct, such as fabrication, plagiarism, or falsification;
 - d. whistleblower retaliation or major ethical violations under the *Code of Ethical Conduct*; or
 - e. alcohol or drug policy violations.

2. Interim actions remain possible pending final outcomes.

E. PRINCIPLES & INTERIM MEASURES

1. All investigations into allegations of misconduct or other policy violations shall be handled with confidentiality, fairness, and due process, including rights to appeal where applicable.
2. Interim actions such as administrative leave, duty reassignment, or temporary transfers may be taken—with HR involvement—but do *not* constitute disciplinary action.

F. APPEALS & DUE PROCESS

1. **Eligible faculty** may appeal major sanctions via the **Faculty Grievance Commission**, in line with Faculty Handbook provisions.
2. **Staff** have appeal rights via internal Human Resources due process channels.
3. **Title IX** and **EEO/Nondiscrimination** violations offer separate appeal mechanisms as defined in the respective policies.

G. CONFIDENTIALITY & DOCUMENTATION

1. All actions and investigations are conducted confidentially to the fullest extent practicable.
2. Written documentation is mandatory for warnings, investigations, and final decisions and should be handled by the Office of Human Resources or the respective policy administrator/disciplinary authority.

H. DISCIPLINARY STEPS FOR NONCOMPLIANCE WITH MANDATORY UNIVERSITY COMPLIANCE TRAINING

Howard University is committed to investing in ongoing training for faculty and staff that (1) helps increase knowledge base and competence in delivering best practices for the University community, (2) informs faculty and staff of their rights and responsibilities under University policies, and (3) supports the University's compliance with applicable laws, regulations, and policies. Required compliance training administered through individual units includes healthcare compliance and safety training for HU Health Sciences workforce members and business partners, cybersecurity training, and training in the University's Title IX and Nondiscrimination policies. Compliance training is essential to ensure that faculty, staff, and students understand the laws, regulations, and institutional policies that govern their roles. Compliance training helps to protect the University and its community by promoting a

safe, ethical, and inclusive environment while also mitigating legal, financial, and reputational risks. By building shared awareness and accountability, compliance training supports the University's mission and strengthens public trust. For these reasons, Howard has implemented the following disciplinary steps for noncompliance with mandatory training requirements.

1. Faculty and staff members who do not complete mandatory compliance training by the communicated deadline will receive notification of noncompliance from the designated office with a copy to the designated supervisor or department chair. Limited additional time may be given to complete the training, upon reasonable request.
2. If the mandatory compliance training has still not been completed by the faculty or staff member during the extended time allotted, formal notification will be issued by the designated office to the workforce member, the designated supervisor or department chair and to the relevant cabinet member or dean. A limited amount of additional time to complete the training may be awarded only under extenuating circumstances and case-by-case approval from the designated office is required.

If the mandatory compliance training has still not been completed by the additional allotted extension, a formal notice of non-compliance will be included in the employee's personnel folder in Human Resources. Non-compliance with any applicable mandatory compliance training will impact merit increase consideration during performance reviews, promotion and advancement, as well as any other incentives or pay increase benefits that are extended to Howard University faculty and staff.

Non-compliance may also result in access and system-related measures, including but not limited to, temporary suspension of University systems access as applicable, based on the role of the faculty or staff member.

3. Progressive disciplinary steps may be applicable per the *Faculty Handbook* and *Employee Handbook*, as determined by the Office of Human Resources which may include placing the employee on leave without pay for up to two weeks. In this instance, the employee will be given 24 hours before the scheduled start of their leave without pay to complete their training. If the training is still not completed, the employee will be placed on leave, as scheduled, for two weeks and will be expected to complete the training within 24 hours of returning from leave.

If the employee fails to complete their training within 24 hours of returning from leave, the individual will be considered to have voluntarily vacated their position, resulting in termination of employment.

I. VOLUNTEERS

Volunteers who materially violate the University's policies will not be permitted to provide further assistance to the University as a volunteer.

J. BUSINESS ASSOCIATES

If the University learns of a pattern of activity or practice of noncompliance with University policies or required training that constitutes a material breach or violation of the business associate's obligations, the University will take reasonable steps to cure the breach or end the violation. If such steps are unsuccessful, the University may terminate the contract, if feasible, or report the problem to the appropriate leadership or applicable external government agencies.

V. SANCTIONS

Failure to adhere to the requirements of this policy may result in disciplinary action, up to and including separation from the University.

VI. HYPERLINKS

[Employee Handbook](#)

[Faculty Handbook](#)

[Health Insurance Portability and Accountability Act \(HIPAA\) Privacy and Security Violations/Sanctions Policy](#)

[Non-Discrimination Policy and Procedures](#)

[Policy Prohibiting Sex and Gender-Based Discrimination, Sexual Misconduct and Retaliation \(Title IX\)](#)

[Research Misconduct Policy](#)

[Student Privacy Rights Policy](#)