

From the Committee on Open Expression

The Committee on Open Expression (COE), comprising representatives from the faculty, professional staff, undergraduate students, and graduate and professional students, presents this revised draft of the University of Pennsylvania's Open Expression Guidelines. Following intensive work throughout late spring and summer, COE updated the Proposed Guidelines originally published on March 31, incorporating community feedback gathered from the April listening sessions and written testimonials from across the Penn community. This draft also integrates input from the Offices of the President and Provost.

Our proposed revisions assert open expression as an essential component of fulfilling Penn's mission of excellence in academic inquiry, debate, and intellectual discovery, all to the benefit of society. By embedding layered checks and balances, shared governance, and strict viewpoint neutrality into event facilitation and guideline oversight, the guidelines aim to strike a careful balance between preserving robust internal disagreement and protecting the University's academic environment from institutional censorship and undue external pressure.

To ensure all community members have the opportunity to share their perspectives, we invite feedback on this draft. We will host three in-person listening sessions as well as an online form through which written commentary can be shared.

Listening sessions are scheduled as follows:

- Tuesday, November 17, 4 p.m., College Hall 200
- Thursday, November 19, noon, Houston Hall, Ben Franklin Room
- Friday, November 20, 9 a.m., ARCH 108

A valid PennCard will be required to participate in or observe the listening sessions, though attendance records will not be kept. Advance registration is requested via the link below to estimate attendance.

To register your attendance at a listening session or to provide written commentary, visit https://upenn.co1.qualtrics.com/jfe/form/SV_2gH6mzf3obKHqiW. Feedback must be received by Monday, December 7.

The 2026-2027 Committee on Open Expression

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Faculty

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Proposed Revisions to the Guidelines on Open Expression

The freedom to engage in inquiry, debate, and dissent, and to communicate ideas without institutional censorship, undue external pressure, or penalty, is essential to the core mission of the University of Pennsylvania. To fulfill this mission responsibly, herein we translate broad commitments to open expression into concrete guidelines that balance competing interests and provide clear expectations for all community members. These guidelines represent more than a procedural safeguard; they reflect institutional commitment to accountability, transparency, and the enduring vitality of open expression as a shared value.

I. Interpretive Principles

The following principles should guide interpretations of these guidelines.

A. Commitment to Open Expression

Our University champions the fierce independence of academic inquiry, excellence, and freedom of expression among faculty, students, staff, and other members of the Penn community. The freedom to conduct research and experiment; to present, publish, and examine arguments and data; to express views through spoken, written, digital, and artistic mediums; to hear and discuss diverse perspectives; and to voice criticism, demonstrate, and protest is fundamental to the mission of the University of Pennsylvania. These freedoms are protected to ensure that all community members can both contribute to and benefit from the open exchange of ideas necessary for a thriving academic environment that supports the development of critical thinking, intellectual discovery, and the pursuit of knowledge in service to society.

B. Rationale for Guidelines

These guidelines safeguard the University's commitments outlined above and notify all community members of the standards they agree to uphold. Establishing guidelines necessarily involves trading off potential benefits and harms of various types of expression, and no set of rules can fully accommodate the diverse perspectives at Penn regarding open expression. Those who disagree with provisions of these guidelines can use expression and the formal processes outlined below to seek their amendment.

C. Reliance on Good Faith

These guidelines cannot cover every possible instance of challenging expression, so their effectiveness depends on the good-faith efforts of all Penn community members to listen to each other, treat people with mutual respect, and apply the guidelines in a collaborative spirit.

D. Presumption of Open Expression

Expression lies at the heart of the University of Pennsylvania. To protect a broad scope of expression, expression that does not violate the standards below is presumptively permitted.

E. Non-Endorsement

By allowing specific instances of open expression, the University does not endorse the content or viewpoint expressed; rather, it affirms only the right of members of its community to engage in expression to create a robust marketplace of ideas and foster reasoned debate, disagreement, and discourse.

F. Fair Notice

A person should be able to understand when these guidelines apply and what conduct is prohibited. In evaluating whether particular actions conform with the guidelines, institutional actors should consider the accessibility and clarity of the relevant guidelines and policies.

G. Relationship to the Law

The University of Pennsylvania's commitment to open expression does not excuse members of the Penn community from compliance with the law.

II. Definitions

- event—a planned undertaking for the purpose of expression.
- expression, expressive activity—action intended to convey ideas, perspectives, opinions, or knowledge.
- guests—persons invited by persons associated with the University of Pennsylvania, and persons on the premises of the University by explicit, implicit, or legally constructed permission.
- persons associated with the University of Pennsylvania, University Community—degree and non-degree students, including students

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on unexpired leave; weekly, professional, and voluntary staff, all members of the academic staff as defined in Section II of the Faculty Handbook; associated residents of college houses, University Trustees, and Advisory Board members.

- University of Pennsylvania, the University—operationally, the organization with the legal title *The Trustees of the University of Pennsylvania*, which includes all constituent schools, all constituent research centers, all subdivisions and affiliates; physically, all properties used by the University of Pennsylvania.

III. Applicability of These Guidelines

A. University Affiliation:

These guidelines apply to all persons associated with the University of Pennsylvania and to all persons present as guests. Persons not associated with the University enjoy less expansive privileges to access University premises and resources for expression than those in the University community.

B. University Activities:

- i. These guidelines apply to expressive activities (1) that occur on the premises of the University, (2) are hosted by a group directly affiliated with the University of Pennsylvania, (3) make use of University resources, including electronic resources, or (4) when a person expressing views describes themselves as an affiliate of the University for any reason other than identification, or a reasonable person would believe that the individual/organization is acting on behalf of the University or an affiliated organization.
- ii. These guidelines do not apply to teaching or research activities or clinical care, which are governed by University of Pennsylvania policies specific to these domains.

IV. Standards

The University shall encourage and facilitate free and open expression in accordance with these guidelines. Those hosting expressive activities should review these guidelines and associated University policies governing time, place, and manner of expression to ensure that these standards are upheld. The following standards apply to all University Community members and guests. The application and enforcement of the guidelines and related University policies shall be consistent, regardless of the substance or nature of the views expressed.

Individuals or groups violate the guidelines if:

- A. They intentionally or knowingly violate time, place, and manner restrictions established by the University in a manner that adversely impacts another person. University policies governing the time, place, and manner of expression are outlined in Appendix I.
- B. They negligently, recklessly, or intentionally cause physical injury or threaten such injury to any person or group at the University.
- C. They enforce these guidelines or time, place, and manner restrictions in a manner that is not neutral with respect to the substance or nature of the views expressed.
- D. They negligently, recklessly, or intentionally, either individually or cumulatively through coordinated action, damage University property or the property of others.
- E. They intentionally engage in speech or conduct that is harassing or threatening and sufficiently severe, pervasive, and objectively offensive so as to deny a Penn community member's ability to participate in or benefit from their education or work. Such speech or conduct will be considered more severe if it targets individuals or groups on the basis of a characteristic or class protected by the University's Equal Opportunity Policy and Nondiscrimination Statement, laws, or other related Penn policies.
- F. They negligently, recklessly, or intentionally interfere with the speech of others. Protecting open expression includes protecting the rights of both the individual expressing a viewpoint and those who disagree. Community members may protest speakers on campus with whom they disagree, but they may not do so in a way that prevents the speaker from expressing their views or prevents other community members from hearing or seeing the speaker.

Expression that conforms to these standards is presumptively allowed, and the University shall act to encourage and facilitate free and open expression that complies with these standards.

All administrative decisions across all offices and schools regarding space allocation, event timing, safety assessments, Campus Expression

Facilitator (CEF, as defined below) deployment, and disciplinary referrals must be strictly viewpoint-neutral. Safety assessments or operational concerns shall not serve as a pretext for restricting, delaying, or relocating speech based on its content, the speaker's identity, or opponents' reactions.

For violations of standards other than B. and D. above, community members should not be held liable without sufficient notice and reasonable opportunity to bring their conduct into conformance with the Guidelines.

V. Roles and Responsibilities

A. Committee on Open Expression (COE)

The Committee on Open Expression (COE) provides institutional oversight to ensure the University's principles of free expression are applied consistently and effectively. The COE functions as an independent and broadly representative body, comprising faculty, staff, and students across a range of roles and levels of experience. The COE's responsibilities reflect that open expression does not flourish by default, but rather through stewardship that includes continuous and transparent oversight, a reliable means of identifying and addressing any divergence between stated values and practice, and an enduring forum in which the University Community's diverse perspectives can shape how open expression continues to evolve.

Administrative and operational policies and procedures of the COE are included in Appendix II.

The COE's responsibilities include:

- i. Providing advice. Any member of the University community may request advisory opinions from the COE. The COE may be requested to provide advisory opinions in advance on case referrals and interpretations of the guidelines as they may relate to these cases. The COE may review incidents in retrospect to provide guidance to the University Community for future action. The COE is available to work with members of Penn's administration in the integration of the principles of these guidelines within the University's mission.
- ii. Reviewing reports from University offices and committees that engage with expression issues to ensure that the guidelines are applied as intended; and if not, making recommendations for revisions or providing an interpretation of the existing guidelines. Such reports will include data and additional details, as feasible while protecting privacy, relevant to open expression, including but not limited to: the number of cases related to expression referred for disciplinary actions against faculty, staff, students, or other members of the Penn community, and their disposition; the number and types of events denied approval or moved, and the activity of the CEF program.
- iii. In consultation with the Executive Director of Open Expression (EDOE, as defined below), reviewing policies and procedures from University offices that relate to open expression, such as signage, protests, and demonstrations, to ensure that University policies and procedures follow and integrate with these guidelines; and if not, making recommendations to the issuing body for appropriate revisions of such policies and procedures. Any policies or procedures required for compliance with local, state, or federal law are not subject to this provision.
- iv. Active participation in hiring of the EDOE, with COE members constituting a majority of the search committee and holding full voting privileges.
- v. Submitting an annual report to the Provost and the constituent groups the COE represents (including but not limited to Faculty Senate, Graduate and Professional Student Assembly (GAPSA), Penn Professional Staff Assembly (PPSA), Undergraduate Assembly (UA), and the Weekly Paid Professional Staff Association (WPPSA), on the status of the committee's work, including EDOE actions, appropriately redacted for the Family Educational Rights and Privacy Act (FERPA) and other privacy concerns. The report will outline any changes to these guidelines, to related University policies, or to best practices in the following year. This report will be published in *Almanac*, the University's journal of record.
- vi. Proposing revisions and interpretations of the guidelines when the COE deems such revisions necessary, including issuing interpretative guidance to give more specific meaning to the guidelines, and reviewing the guidelines every 5 years, or as needed.

B. Executive Director of Open Expression (EDOE)

The COE will have functional oversight of the Executive Director of Open Expression (EDOE). The COE sets policies and definitions regarding open expression, while the EDOE serves as executive agent. The EDOE runs daily operations and may propose operational changes to the COE, which the COE reviews to confirm compliance with the guidelines.

Establishing the EDOE position reflects the recognition that the Open Expression Guidelines require dedicated leadership to be meaningfully realized in practice. The EDOE will be housed in an independent Office of Open Expression under the Provost but with primary operational oversight from COE. The EDOE serves as the principal steward of the University's Open Expression Guidelines, protecting, supporting, and maintaining the right to open expression under these guidelines, so expressive activity may proceed in a manner consistent with both organizers' objectives and institutional principles. CEFs assist the EDOE in these tasks. The EDOE has the authority to initiate referrals if actions suggest that any member of the University community is violating the guidelines. The COE advises the EDOE and members of the University community on interpretations of the guidelines.

The EDOE functions as a central point of coordination among the CEF program, the Committee on Open Expression, and University leadership, ensuring that the implementation of the guidelines remains coherent and consistent across the institution.

Responsibilities

- i. Manage the CEF program, including recruiting, training, and deploying CEFs.
- ii. Make decisions based on the University's Open Expression Guidelines regarding referrals related to open expression matters. As needed, consult with COE regarding referrals as indicated in Section VI. Upholding Guidelines.
- iii. Report regularly to the COE on the functioning and effectiveness of the CEF program.
- iv. Provide educational opportunities about open expression to the broader Penn community, in collaboration with other university units.
- v. Work with the Tri-Chairs of the COE and the Provost's office to help guide the vision and broad practice of protecting the Open Expression Guidelines through the CEF program, the COE, and other relevant offices.
- vi. Serve ex officio on the COE.
- vii. Be available or designate a person from the EDOE office to be available when issues arise concerning expression; for both planned and unplanned events.

C. Campus Expression Facilitators (CEFs)

The Campus Expression Facilitators (CEFs) promote and protect the free exchange of ideas as a fundamental right of every member of the Penn community. They receive significant training in the guidelines, as well as in conflict resolution, de-escalation, and mediation. They serve as a resource for event organizers and participants before and during events. This role reflects the belief that protecting free expression requires not just clear guidelines, but active, on-the-ground support that upholds mutual respect and community trust even in moments of disagreement or conflict. More details about the CEF role are found in Appendix III.

VI. Upholding Guidelines

Upholding the Open Expression Guidelines relies on layered checks rather than a single point of authority. CEFs mediate and inform but remain distanced from documentation and disciplinary referrals. The EDOE always prioritizes de-escalation, but may consider documentation as part of referrals for disciplinary action. Even when a violation is suspected, the process preserves room for challenge and consultation; individuals may contest a CEF's judgment, and the COE can provide advisory opinions without delaying disciplinary proceedings.

A. Role of EDOE and CEFs

- i. All Penn community members should familiarize themselves with the Open Expression Guidelines. The EDOE and the CEFs are available to clarify these guidelines, especially in preparation for events, so that events can be structured around organizers' goals and objectives as they pertain to promoting free expression and fulfilling the guidelines.
- ii. When attending an event, CEFs aim to protect and promote the free exchange of ideas in an environment of mutual respect. As needed,

they can mediate, de-escalate, and inform event participants on relevant aspects of the guidelines.

- iii. CEFs respect the privacy of those attending an event. When CEFs perceive a potential violation of the guidelines that persists despite repeated de-escalation attempts during the event, they may ask whether event participants are members of the Penn community and, to that end, may ask to see PennIDs. Only in cases where the perceived violation persists beyond this request may CEFs consider recording identifying information. Before recording identifying information, CEFs must inform the individuals involved that the information will be recorded.
- iv. When repeated mediation attempts fail, CEFs may request the assistance of the EDOE, either during or after an event. When a CEF calls the EDOE, the EDOE will first attempt further mediation with all relevant parties after familiarizing themselves with the events.
- v. If participants do not modify their behavior to bring the activity into compliance with the guidelines, the EDOE may record identifying information after informing individuals of this step and may initiate referrals for potential disciplinary action for violations of the guidelines. Appendix IV details the referral structure. University community members may also report potential violations to the EDOE for referral consideration. Initiation of a referral is not tantamount to a finding that a violation has occurred.
- vi. In extenuating circumstances, CEFs or the EDOE, like any member of the Penn community, may choose to contact the Division of Public Safety (DPS) for assistance. Obligations regarding ID requests from law enforcement officers such as Philadelphia Police and Penn Police are governed by statutes. CEFs report any requests for assistance from the DPS to the EDOE, who shall report them to the COE.
- vii. Expressive activities that violate the guidelines can be disbanded by the University if mediation between the CEFs, the EDOE, and the involved parties is unable to resolve the violation.
- viii. Alleged violations of these guidelines are reviewed with the EDOE to determine whether the case merits referral. The EDOE may consult the Tri-Chairs of the COE, but the final decision regarding referral rests with the EDOE.

B. Consultation with the Committee on Open Expression

- i. Individuals or groups referred to a relevant body for guidelines violations as described in Appendix IV may request an advisory opinion from the COE on whether their conduct is properly understood to violate the Guidelines. The relevant body may also request an advisory opinion from the COE. The COE will take up these requests at the discretion of the COE Tri-Chairs. The COE may then issue its advisory opinion to the relevant body listed in Appendix IV, which will consider the opinion in its determination as to whether the conduct in question violated the guidelines or any other Penn policy. The COE's advisory opinion shall not unreasonably delay any disciplinary process.
- ii. The COE may, upon request from any member of the University Community, draft and issue an advisory opinion with respect to any conduct or activity that relates to open expression generally or these guidelines specifically.
- iii. The COE may, at its discretion, request information from the relevant individuals involved or from other Penn officials, review their involvement and policies, and issue recommendations to the Provost and Faculty Senate Tri-Chairs for future actions, such as revising policies and practices.

C. Additional Provisions

- i. These guidelines exist alongside myriad policies that support the mission of the University. The central role if not primacy of open expression to the University's mission is presumed in the writing of these guidelines. If perceived tensions between these guidelines and other University policies arise, they must be resolved collaboratively among COE, EDOE, and University administration, with open expression principles serving as the guiding force absent exceptional circumstances for considering other University policies.
- ii. If event organizers believe that a decision by a University official to delay, relocate, or impose security requirements on an event is being made based upon its expected expressive content, they may request a written justification for the requirement from the relevant

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official, who should provide said justification within 24 hours to both the event organizer and the COE.

- iii. Prior to referring any member of the Penn community for disciplinary action under these guidelines, the EDOE may consult the Tri-Chairs of COE. Regardless of whether consultation occurred, the referred party can submit an appeal to the Tri-Chairs of the COE, who can issue an expedited interlocutory stay of the referral pending a formal review by a three-member COE panel.
- iv. Guidelines pertaining to inviting speakers to campus are detailed in Appendix V.

VII. Amendments

Members of the University Community and others may suggest revisions to these guidelines to the Committee on Open Expression, which has discretion to propose amendments. Proposals to amend or repeal the guidelines are presented by the Committee on Open Expression to the University Council for a vote. The results of the vote will be forwarded for advisory purposes to the University President, whereupon they will accept or reject the proposals.

Appendices

Appendix I. Framework for the Time, Place, and Manner of Open Expression

A. Expressive activities violate the University's time, place, and manner restrictions if they:

- i. Physically block any entrance, ADA-accessible entrance, hallway, doorway, ramp, paved surface, or other area in such a way that prevents an individual, regardless of physical ability, from navigating buildings or walkways, or they violate the Facilities & Real Estate Services policies.
- ii. Intentionally block or cover building names, navigational signs, and other objects meant to aid in campus navigation.
- iii. Enter a space that normally contains valuable, sensitive materials, collections, equipment, or records protected by law or University Policy without prior written permission by an individual or entity that has authority to grant access to the space. The authority granting written permission is responsible for securing valuable and sensitive material before allowing others to access the space.
- iv. Hold a demonstration or gathering in a clinical care facility.
- v. Produce a pattern or volume of sound that disrupts normal campus operations. This includes continuous, recurring, or daily high-volume sound during permitted windows that systematically degrades surrounding living, study, or research environments. Sound will be considered disruptive if it exceeds 85 decibels in any location. Outdoor events using amplified sound should position the amplifying device(s) facing away from nearby buildings. Only quiet, low-light events will be permitted from 10 p.m. to 8 a.m. and during Final Exams and Reading Days in College Green, Levy Park, and Penn Commons.
- vi. Remain in or occupy non-residential University facilities past published closing hours without prior authorization.
- vii. When using University-affiliated social media platforms, violate the Guidelines for the Use of Social Media at Penn (Social Media Policy), specifically as it relates to Sections IIb. Freedom of Speech and Reservation of Rights, IIh. Political/Social Opinions and section VI. Social Media and Personal Safety. Community members have the right to use social media to express themselves. However, this right is not unlimited and is circumscribed by law.

B. Banners, Signage, and Images

- i. The hanging of large banners, flags, or other materials on University property must comply with Campus-Wide Special Event Banner Policy & Procedures as established by Facilities and Real Estate Services. Materials hung on dorm or office windows are permitted but may be subject to building-specific and Facilities & Real Estate Services policies. Individuals may hold large banners, flags, or other materials or hang them from personal property (such as a vehicle, bicycle, or fold-up chair). Any hung or held object that contains defamatory or obscene content, constitutes a true threat, or creates a hostile environment through targeted discriminatory harassment as defined by University policy is forbidden and must be removed upon request by the University.

- ii. It is a violation of the guidelines to intentionally remove or deface materials posted by another individual or organization.
- iii. Excess, duplicated, or mass-flooded compliant postings may be consolidated or removed by authorized University personnel to preserve open access for other community members.
- iv. Chalking is permitted on sidewalks and outdoor stairways only, provided it complies with provisions in B.i. above. Chalk used must be washable.
- v. Before erecting any temporary structure on University property, permission or a permit must be obtained from authorized University personnel. Temporary structures include but are not limited to tents, stages, shelters, temporary floors, and event seating (personal folding chairs are permitted).
- vi. Permission must be obtained from the Executive Director of Open Expression in order to project any image onto University property or a stand-alone screen as part of an event. The Executive Director of Open Expression must review and approve the projection content. If the material to be projected is not approved, the submitting organization will receive written notice with specific, detailed reasons for the rejection. For this reason, it is suggested to submit materials well in advance of an event.

C. Scheduling Events

The facilities of the University of Pennsylvania, both indoor and outdoor, exist for the primary purpose of University-related education, research, and patient care.

- i. Facility use priority goes first to academic and patient care activities, then to programs of University-recognized groups.
- ii. Events are presumed to be private, that is, limited to members of the Penn community, unless specifically stated otherwise (e.g., designated as "open to the public").
- iii. The procedure for scheduling events varies for different venues. Organizers should research and determine the process required for their chosen venues. University Life Space and Events Management manages space reservations for many University locations and may serve as a resource for event organizers seeking to reserve space.
- iv. Scheduling of spaces within specific school or center facilities is administered by the school or center. Use of these particular spaces may be supplemented by University policies. In all circumstances, the Open Expression Guidelines shall guide the University, the schools, and the centers.
- v. University Life Space and Events Management or the specific school or center—in consultation with the Division of Public Safety—may determine that certain events require a security assessment from the Division of Public Safety. In these instances, the event may require additional safety/security measures. The Special Event Security Request Form must be used to request event security provided by Penn's Division of Public Safety.
- vi. Spontaneous expressive activities may occur in any outdoor, publicly accessible campus space, provided they do not violate any guidelines, including those in Appendix I.A-B, or conflict with previously-registered events in the same space. CEFs or the EDOE will be available to attend events as facilitators, and event organizers are encouraged to communicate their plans with the EDOE in the Office of Open Expression.

Appendix II. Committee on Open Expression

A. Purpose and Procedures

- i. COE is a standing committee of the University Council tasked with interpreting the guidelines and mediating in situations that involve possible violations of the guidelines.
- ii. COE shall serve as an independent monitor of matters involving the expression and implementation of these principles. COE shall advise the President, the Provost, the Faculty Senate Tri-Chairs, and other representative boards (including GAPSA, NEC, PPSA, WPPSA) as requested.
- iii. Nine members of the Committee on Open Expression shall constitute a quorum for any meeting.
- iv. A simple majority of those present for a meeting is required for any interpretations or other recommendations, except for recommendations to amend or repeal the guidelines, which require support from

at least two-thirds of the seated committee membership. For the purposes of these guidelines, any vacancies shall reduce the size of the “full committee membership” until such time as those vacancies are filled. The Provost should be advised promptly of any COE decision to amend or repeal the guidelines.

B. Composition/Appointment Method

The Committee on Open Expression consists of 17 voting members, constituted as follows:

- i. Eight faculty members named by the Faculty Senate Nominating Committee, one of whom may be a full-time member of the associated faculty or academic support staff.
- ii. Two professional staff members named by the Penn Professional Staff Assembly.
- iii. One weekly-paid staff member named by the Weekly-Paid Professional Staff Assembly (or, if not constituted, a weekly-paid staff member nominated by the Penn Professional Staff Assembly).
- iv. Three undergraduate students, named by the Nominations and Elections Committee.
- v. Three graduate/professional students, named by the Graduate and Professional Student Assembly.
- vi. In selecting members for the Committee on Open Expression, constituent organizations should seek to achieve a range of faculty, staff, and student membership, including a range of schools represented, faculty rank, scholarship/research expertise, and University leadership and service.

Members of the Committee are appointed for the following terms:

- i. The faculty representatives and the representatives of the Penn Professional Staff Assembly and Weekly-Paid Professional Staff Assembly are appointed to three-year terms. The terms shall be staggered so that they serve overlapping terms; accordingly, the initial terms of such representatives may be one or two years to enable staggered terms. A new committee year shall begin annually on September 1.
- ii. The undergraduate and graduate/professional student members are appointed to one-year terms.
- iii. Vacancies shall be filled for the unexpired term by the appropriate naming body set forth above. For the purposes of calculating duration of consecutive service time, partial-term appointments made to fill vacancies shall not be included in the calculation.
- iv. COE leadership shall function as a tri-chair system, consisting of a past-chair, chair, and chair-elect. As the first act of the committee at the beginning of its service year, COE members shall identify a chair-elect from among the faculty representatives to COE. The previous chair-elect will accede to become chair, and the previous chair will serve as the past chair. Eligible nominees for chair-elect must not have completed two consecutive years of service on COE at the time of election. A vacancy in the chair-elect position shall be filled for the unexpired term by the process described above. A vacancy in the chair position shall be filled by the chair-elect for the remainder of the unexpired term. A vacancy in the past chair position shall not be filled. For time-sensitive matters requiring immediate action, the active chair (or chair-elect in the chair's absence) is authorized to act on behalf of the Tri-Chairs.

Appendix III. Campus Expression Facilitators

Campus Expression Facilitators

- a. All members of the Penn community can apply to become a CEF. The EDOE manages CEF selection with support from the COE Chair.
- b. CEFs are neutral parties who engage with meetings, events, or demonstrations when requested either by event organizers or by the EDOE. Event organizers are also encouraged to consult with CEFs before events to support planning.
- c. CEFs identify themselves to those responsible for the meeting or event or to the leaders of a protest or demonstration.

- d. All CEFs must complete formal conflict resolution and mediation training prior to assisting with any event.

Appendix IV. Referral Structure

- a. Students are referred to the Center for Community Standards and Accountability (CSA) upon the filing of a complaint and preliminary review of the allegations. If the CSA pursues a charge, it will follow the normal disciplinary/restorative justice process, as appropriate.
- b. Staff are referred to the Division of Human Resources, which will follow applicable University, school, or center staff disciplinary processes.
- c. Faculty are referred to their school dean or the Provost for further action, in accordance with The Faculty Handbook. The Dean or Provost may consult with the COE and the School's Committee on Academic Freedom for advice, but is not required to do so. If a case is pursued, the Dean or Provost will follow the Procedure Governing Sanctions Taken Against Members of the Faculty in the Faculty Handbook.
- d. If a case is pursued against Trustees, further action is defined by following the Statutes of the Trustees, and a case against Advisory Board members by following general institutional leadership standards.

Appendix V. Inviting Speakers to Campus

- a. Most speakers at Penn are invited not by the University itself, but by particular organizations, departments, schools, and individuals at Penn. The guidelines protect members of the entire University community against reprisal for hosting speakers and events. Other members of the University community may likewise criticize a proposed speaker's or event's substance or viewpoint, call upon the event organizer to cancel an event or rescind an invitation, or circulate petitions calling for community members not to attend an event. But criticism may not express or imply a threat to an organization's, speaker's, or event's physical safety, or a threat of violence or similar unlawful conduct. Event attendees must adhere to the guidelines as defined in Standards-IV.F.
- b. Units of the University, barring any concerns over budget, security, health, or safety, shall allow reservations of venues, provision of security, audiovisual, publicity, and other logistical support on a first-come, first-served basis and in accordance with the Guidelines and University policies. Any denial of a timely (defined as 7 business days) request for venue or related services/support may not be based on the substance or nature of the views expressed. If a denial is issued because of concerns about budget, security, health, or safety, the venue will specify the concern for the reserving party's review. A wide range of University departments handle reservations; these guidelines defer to individual venues on their immediate or day-of booking policies.
- c. Notwithstanding the foregoing, the Division of Public Safety (DPS) may recommend that an event take place in a particular University venue. The DPS may recommend or require that an event be protected by additional security and/or take place at a later date to allow more time to plan appropriately to safeguard open expression and for the safety of the community and invited guests. Organizers or DPS may request an expedited advisory opinion from the COE under Section VI.B on whether a requirement is consistent with the Guidelines. In cases where the DPS requires an event to use additional security and/or take place at a later date, they will publish in their *Almanac* weekly report a summary rationale, omitting specific details when public disclosure would compromise safety or security.
- d. Any invitations to political candidates or events featuring or promoting political candidates for elected office may be prohibited or may be made subject to additional requirements due to the University's tax-exempt status as required by the Internal Revenue Code's “restriction of political campaign intervention.”