Policy 4017: Title IX Grievance Procedures – Employee and Student

The Governing Authority shall not discriminate on the basis of sex in the educational programs or activities of the School that receive federal financial assistance. This prohibition encompasses discrimination based on an individual's gender identity, including discrimination based on an individual's transgender status. The Governing Authority hereby designates the School Director as the Title IX Coordinator for the School.

The Title IX Coordinator's duties shall include, but not be limited to, coordinating the School's effort to comply with and carry out its responsibilities under Title IX and carry out an investigation of any complaint communicated to the School alleging its noncompliance with Title IX or alleging any uses which would be prohibited by Title IX in accordance with the procedures set forth hereinafter. The Title IX Coordinator may be assisted by such additional personnel as from time to time may be appointed.

Complaints involving alleged discrimination on the basis of sex in any program or activity that receives federal financial assistance, whether carried out by School employees, students, or third parties, shall be handled in accordance with the following procedure unless a policy has been adopted to deal with the specific discrimination. If a more specific policy exists, that policy shall be followed.

Step 1:

Any student or employee who has a complaint of alleged sex discrimination shall attempt promptly to resolve the complaint by discussion with the School Director or immediate supervisor in case of classified employees. If the immediate supervisor is the subject of the complaint, the complaint should be filed with the Title IX Coordinator. If the Title IX Coordinator is the subject of the complaint, the complaint can be filed directly to the Vice President of Operations. The complaint should be in writing and describe, in as much detail as possible, the facts of the situation. The Title IX Coordinator or supervisor shall keep a written record of the discussion and provide a copy to the student or employee involved.

Step 2:

If the complaint is not resolved in Step 1, the complainant may, within ten (10) calendar days after receiving an answer, file the complaint in writing with the Title IX Coordinator and mail a copy to the supervisor involved. The Title IX Coordinator shall arrange a meeting to discuss the complaint within ten (10) calendar days after receiving the written complaint, and subsequent meetings may be scheduled as agreed to by both parties. The Title IX Coordinator shall conduct an adequate, reliable, and impartial investigation of complaints, and shall allow the complainant to identify witnesses and other evidence. The Title IX Coordinator shall give a written answer to the complainant by certified mail, return receipt requested, within ten (10) calendar days after the final meeting regarding the complaint. A copy of the written answer shall also be provided to the respondent and the supervisor.

Step 3:

If the decision rendered by the Title IX Coordinator does not resolve the complaint to the satisfaction of the complainant or the respondent, such person can, within ten (10) calendar days, appeal in writing to the Management Company's Chief Executive Officer. The notice of appeal shall be sent to the Title IX Coordinator and a copy filed with the Chief Executive Officer. Failure to file such appeal within ten (10) calendar days from the receipt of the written memorandum of the Title IX Coordinator's action on said grievance shall be deemed a waiver of the right to appeal. The Chief Executive Officer shall hold a meeting within thirty (30) days, and the complainant and the respondent shall be advised in writing of the time, place, and date of the meeting.

The complainant and the respondent shall receive written notice of the meeting no less than five (5) calendar days in advance of the meeting. The Chief Executive Officer shall act upon such appeal officially no later than 30 days following the. Copies of the final decision shall be sent to the complainant, the respondent, the Title IX Coordinator, and the supervisor. The decision of the Chief Executive Officer shall be final.

If the grievance cannot be resolved through the above procedure, a request for an official interpretation may be filed with the U.S. Department of Education – Office for Civil Rights, Bank One Center, Room 750, 600 Superior Avenue East, Cleveland, Ohio 44114-7650.