



Special Committee Members

Julia Brim-Edwards, Chair

Mike Rosen

Rita Moore

Board Policy and Governance Special Committee

June 8, 2018

8:30 am

Willamette Conference Room

AGENDA

1. Staff dismissal hearing policy
2. Complaint policy update
3. Student adult boundaries policy
4. Access to district public records policy update



Formal Public Complaints—First Reading 4.50.032-P

Portland Public Schools recognizes students, parents/guardians, and the broader community as essential partners in the educational process. These important partners must have the opportunity to make their concerns known to the district. Maintaining strong relationships includes having a fair, accessible process in which complaints can be addressed in a timely manner. Portland Public Schools welcomes expressions of concern as opportunities to learn, clarify our intentions, and engage in continuous improvement to benefit all students.

Whenever possible, concerns should be resolved informally through communication with the school or department directly involved in the issue. If this approach does not resolve the concerns, the District provides a formal complaint process. The Board intends that complaints be resolved as expeditiously as possible and in compliance with state law.

The District serves a diverse community of students and parents/guardians. The Racial Educational Equity Policy 2.10.010-P provides: "The District shall welcome and empower students and families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student's education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community." The complaint process must be implemented in a manner that is accessible to, and welcoming of, all of our students, parents/guardians, and community members. All parties to the complaint process will be treated, and will treat others, with dignity and respect.

I. Administrative Directive creation and review; Annual reports; Transparency and accessibility

- A. The Board of Education directs the Superintendent to implement an administrative directive that sets forth the specific process and procedure for complaint resolution. The administrative directive and any changes that are subsequently made will be submitted to the Board for review. The Board further directs the Superintendent to make information regarding the complaint process to members of the school community in a manner that is accessible and user-friendly, and to provide training for building administration and designated district staff in the implementation of the policy and administrative directive. Since complaints can be an important indicator of the health of an organization, the Superintendent will provide to the Board at least annually a document that provides data on trends and emerging issues, as well as the functioning of the process.

A full explanation of the complaint procedure, including all forms, shall be available at the district's administrative office and on the home page of the district's website.

1. Types of complaints

This policy provides a process for resolving complaints as required by Oregon Administrative Rule 581-022-2370 [\[create hyperlink\]](#), including, but not limited to complaints related to:

- a) Instructional standards and practices
 - (1) Curriculum
 - (2) Teaching strategies
 - (3) Testing
 - (4) Counseling
 - (5) Class size
 - (6) Alternative education programs
 - (7) Instructional materials
 - (8) Compliance with state standards
- b) Special education
- c) Health and safety
- d) Equitable education opportunities
- e) Sports safety
- f) Restraint and/or seclusion
- g) Discrimination in education
- h) Retaliation against a student or parent/guardian

II. TIMELINES

- A. In order to investigate a complaint while memories are recent and witnesses and documents are likely more available, a complaint may be filed within the following time limits established by state law:
 - 1. Within two years after the alleged violation or unlawful incident occurred or the complainant discovered the alleged violation or unlawful incident. For incidents that are continuing in nature, the time limitation runs from the date of the most recent incident; OR
 - 2. Within one year after the affected student has graduated from, moved away from, or otherwise left the district, whichever is later.
- B. The time limitations for bringing formal complaints may be extended by the District for complaints concerning significant student safety issues, including those arising out of employee misconduct, sexual abuse or conduct, or other allegations of harm to students.
- C. The receipt of a written complaint starts the 90-day timeline for resolution of complaints under this policy.

III. FILING A COMPLAINT

A. STEP 1:

1. The written complaint must be filed with the District's complaint coordinator via letter, email, or the written complaint form [INSERT HYPERLINK]. The written complaint should include the name and contact information for the complainant, a description of the concern, and the student's name, if applicable. It is helpful if the written complaint also includes the names of any other parties involved, including witnesses, a description of efforts to resolve the concern, and suggestions for resolution. The complainant shall receive a written acknowledgement of receipt of the complaint within 5 days of submitting the written complaint.
2. In most situations, a District leader for the involved school, or the appropriate departmental supervisor, will be responsible for investigating and responding to the complaint at Step 1. The Superintendent may assign a different decision maker at Step 1 as appropriate.
3. All formal complaints will receive a decision in writing that addresses each concern raised and contains reasons for the District's decision within 30 days of receipt of the complaint, unless the parties agree to extend the deadline. The resolution will include information about the next steps in the complaint process

IV. FILING AN APPEAL

A. STEP 2: APPEAL TO THE SUPERINTENDENT

If the issue is not resolved to the complainant's satisfaction, the complainant may request a review by the Superintendent. The request for review shall be submitted in writing within 10 days of the complainant receiving notice of resolution from Step 1.

1. After reviewing materials previously submitted or gathered and after conducting additional review, if deemed necessary, the Superintendent or designee shall issue a written decision addressing each concern raised and the reason for the decision and provide the decision to the complainant, pursuant to OAR 581-022-2370. All complaints appealed to the Superintendent will receive a decision in writing within 30 days of receipt of the request for review. The Superintendent or designee will include information on the steps for further appeal under this policy.
2. Upon receiving the Superintendent's decision, if the complainant wants to continue to appeal, the complainant may appeal to the Board.

B. STEP 3: APPEAL TO THE PPS SCHOOL BOARD

The Board will vote on the substance of the appeal within 30 days of the written request to appeal the Superintendent's decision. The Board will have the full written record of the decisions at Step 1 and Step 2. The complainant may submit additional written information to the Board and may provide testimony during public comment. The Board shall decide that the Superintendent's final decision is:

1. Affirmed and no further action will be taken; or
2. Reversed and may direct the Superintendent to take alternative steps or other course of action. To the extent the Board modifies the Superintendent's decision, it will issue a final decision that addresses each concern raised in the complaint and contains reasons for the District's decision.

If the complainant is not satisfied with the decision of the Board, the complainant can file an appeal with the Oregon Department of Education (ODE) as permitted by OAR 581-022-2370(4) and OAR 581-002-0040.

C. Anonymous Complaints

PPS accepts confidential anonymous complaints by email at [_____] and phone at [_____]. Those making complaints anonymously should provide as much information as possible when making the complaint. PPS will investigate any complaint, including anonymous complaints, as fully as it can.

D. Other provisions

1. Translation and interpretation services are available to complainants. [INSERT LINK TO REQUEST SERVICES]
2. The District will provide resources for complainants who request assistance in preparing a written complaint. [INSERT LINK TO REQUEST ASSISTANCE]
3. The Superintendent shall avoid any conflicts of interest, or the appearance of conflicts of interest, in assigning the district representative to investigate and respond to a complaint.
4. Complainants may bring an advocate or support person to any meeting or proceeding.
5. Retaliation against any person who files or participates in the complaint process is strictly prohibited. Retaliation is any action that would deter a reasonable

person from participating in the process. Anyone who believes they have suffered retaliation should immediately report it to the Superintendent or PPS Board of Directors.

6. The District will share with complainants as much information as possible about the findings of the investigation and will, in all cases, share the outcome of its investigation of complaints. However, PPS is often prohibited from disclosing specific information about disciplinary action taken against an employee involved in the complaint. The Board will not hear complaints against employees in a session open to the public unless an employee requests an open session.
7. If the district fails to meet the timelines set forth in this process, the complainant may appeal to the PPS School Board or to the Oregon Department of Education. The timelines may be extended by the mutual consent of the complainant and the District. For example, this may be needed if there are many witnesses to interview, key witnesses are unavailable because of holidays, medical leave, etc., or if a particular Board meeting does not work for the complainant.
8. As used in this policy, "days" will be counted as "calendar days." Any period for response under this policy that falls on a weekend or legal holiday shall be extended to the next business day.
9. The district may not be able to assure confidentiality of the names of persons who file complaints under this policy.
10. If a complaint alleges employee misconduct that is outside the scope of this policy, the complaint coordinator will notify the Superintendent in writing of that filing, and the District will endeavor to respond in a timely manner to the complaint.
11. Current and former employees may not bring a complaint under this policy regarding the terms, conditions, or status of their employment.

E. Complaints against the Superintendent or members of the Board of Education

Any complaint about the Superintendent shall be reviewed by the Board of Education.

Board members are volunteers serving in an elected capacity and are accountable to the citizens in the Portland Public Schools district for their actions and policy positions. Complaints alleging ethics violations or violations of the law against an individual Board member should be made to the Board chair who will refer these issues to appropriate governmental jurisdictions or a third party if a majority of the Board approves of the referral. Complaints related to ethics violations or violations of the law against the Board Chair should be made to the Board Vice-Chair(s) who will refer these issues to appropriate governmental jurisdictions or a third party if a majority of the Board approves of the referral. If a third party investigates a complaint,

after receiving the results of the investigation, the Board shall decide, within 30 days, in open session what action, if any, is warranted.

F. Complaints submitted to school board members

School board members who receive formal complaints from constituents or staff shall forward complaints to the District's complaint coordinator. Board members shall forward informal complaints to the appropriate school or department in order to address the concern.

V. FURTHER APPEAL RIGHTS

If any complaint alleges a violation of Oregon Administrative Rule (OAR) Chapter 581, Division 22 (Standards), Oregon Revised Statute (ORS) 339.285 to 339.383 or OAR 581-021-0550 to 581-021-0570 (Restraint and Seclusion), or ORS 659.852 (Retaliation), and the complaint is not resolved through the complaint process, the complainant, who is a student, a parent or guardian of a student attending a school in the district or a person who resides in the district, may appeal a final decision by the district to the Deputy Superintendent of Public Instruction as outlined in Oregon Administrative Rule (OAR) 581-002-0040.

If the complaint alleges discrimination pursuant to ORS 659.850 (Discrimination in Education) a complainant may appeal a final decision by the District to the Oregon Department of Education or may file a complaint directly with the U.S. Department of Education without having to exhaust district procedures under this policy.

In addition to using the District complaint procedure, Special Education complaints may be made directly to the Oregon Department of Education. The complainant must send a copy of the complaint to the District simultaneous to filing it with the Department of Education.

END OF POLICY

Legal Reference(s):

[ORS 192.610 to 192.690](#)
[ORS 332.107](#)
[ORS 339.285 to 339.383](#)
[ORS 659.852](#)
[OAR 581-022-2370](#)

Portland Public School District 1st Reading

DATE: February 27, 2018

Public Comment for: PUBLIC ACCESS TO DISTRICT RECORDS POLICY 2.50.010-P

The Portland Public School District is providing Notice of Proposed Revised Policy and Public Comment to offer interested parties reasonable opportunity to submit data or comments on the proposed policies noted below.

Public comment may be submitted in writing directly to the district or through the district website noted below. Written comments must be submitted by 5:00pm on the Last Date for Comment listed below.

1st Reading by: Julia Brim-Edwards, Chair, Portland Public School Board
Summary: Revised Policy: Public Access to District Records

Draft Policy Web Site: <http://www.pps.net/Page/1807>
(click on blue "draft policy" box)

Recommended for 1st Reading by: Board of Education

Policy Contact: Rosanne Powell, Board Office Manager

Last Date for Comment: March 20, 2018

Address: P.O. Box 3107, Portland, OR 97208-3107

Telephone: 503-916-3741

E-mail: schoolboard@pps.net

Last Date for Comment: March 20, 2018

2.50.010-P Public Access to District Records

~~It is the intent of the board that all district material is considered a public record unless exempt by ORS 192. Public records should be provided promptly and courteously for inspection upon request.~~

- ~~(1) The superintendent shall develop administrative directives and procedures.~~
- ~~(2) Appropriate fees for copies of Board and district records shall be charged pursuant to Administrative Directive 2.50.012-AD.~~
- ~~(3) Such records shall be made available to persons with disabilities in an appropriate format on request in accordance with the requirements of the Americans with Disabilities Act. No fee to cover the costs of providing records in an alternative format shall be charged. All other actual costs may be recovered, consistent with Board policies, administrative directives and the public records law.~~

Legal References: ORS 192; ADA, 1990, 42 U.S.C. Section 12101 et seq. 29 CFR Part 1630

History: Adpt 12/8/80; Amd 1/84; Amd 9/9/02; BA 2418

2.50.010-P Public Access to District Records

In order to promote transparency and provide an accurate accounting of how the district carries out the public's business it is the intent of the Board that all district records should be disclosed courteously and consistent with state and federal law. The district shall rely upon the definition of "Public Record" set forth in Oregon law.

- (1) The Superintendent shall hire a Public Records Officer and develop administrative directives and procedures to provide clarity and consistency to the public about access to district public records. The Public Records Officer shall process all requests as soon as practicable and without unreasonable delay, without regard to the nature of the records or identity of the requester.
- (2) It is the goal of the school district to provide the public with records at no or minimal cost when the documents requested are not voluminous or do not require significant time to locate and process. The Superintendent shall develop clear guidelines regarding when it is appropriate to charge fees and to provide clarity to requesters as to how fees are determined.
- (3) The district recognizes that it is in possession of sensitive and confidential information about our students, staff, and families. In responding to public records requests, the district will follow state and federal law.
- (4) When public records are requested that could be considered exempt under one of the conditional exemptions under Oregon law, the district shall construe the public interest liberally in favor of disclosure.
- (5) The Public Records Officer shall, with the advice and counsel of the General Counsel or its designee, make determinations as to whether (a) a record is responsive to a public records request; (b) a record contains information the district is prohibited from disclosing; or (c) a record is exempt from disclosure. The Public Records Officer shall have the responsibility of ensuring exemptions are legally and appropriately applied.
- (6) Records shall be made available to persons with disabilities in an appropriate format on request in accordance with the requirements of the Americans with Disabilities Act. No fee to cover the costs of providing records in an alternative format shall be charged. All other actual costs may be recovered, consistent with Board policies, administrative directives, and the public records law.
- (7) If the district requires clarification from the requester, such clarification shall be requested in writing, and the requestor shall be informed that work on the request will stop until the clarification is received. If the original scope of a request is likely to necessitate high fees, the Public Records Officer will offer to work with requesters to negotiate or narrow the scope in order to reduce the costs.
- (8) Requesters who believe the district has inappropriately withheld records or assessed fees may request an expedited review of such decisions by the Board, which will decide whether to hear the appeal and, if it does, issue a decision within 30 days. Requesters

retain their statutory right to request such review from the Multnomah County District Attorney, and the availability of an appeal to the Board does not preclude a requester from appealing a denial directly to the District Attorney rather than to the Board.

- (9) No District employee, student, or Board member may engage in unlawful retaliation against any person who requests public records or requests review of a public records decision. Any employee who engages in any form of retaliation for requesting public records, or requesting review of public records decisions, will be subject to disciplinary action up to and including dismissal.
- (10) To avoid possible conflicts of interest, no employee shall make the final decision on the application of exemptions to a given public records request if they are named in that request. If an in-house PPS attorneys is making the final decision on the application of exemptions applicable to a public records request and they also provided material legal advice regarding the records at issue prior to the records being requested (e.g. a personnel investigation), the in-house attorney shall disclose that fact to the Superintendent's designee prior to making the final decision. Any employee who knowingly and intentionally violates this paragraph will be subject to disciplinary action up to and including dismissal.

Proposed revisions as of 8/29/2017 1:00 PM.

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2.50.010-P Public Access to District Records

In order to promote transparency and provide an accurate accounting of how the district carries out the public's business it is the intent of the board that all district records should be disclosed upon request even if an exemption could apply, unless the district is prohibited by law from disclosing the information or disclosure of the information could create significant and likely legal, physical or business harm to the district students, staff, or facilities. The district shall rely upon the definition of "Public record" laid out in ORS 192.410(4)(a). Public records will be provided promptly and courteously for inspection upon request.

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- (1) The Superintendent shall hire a Public Records Officer and develop administrative directives and procedures to provide clarity and consistency to the public about access to public records, laws regarding public records, and internal processes. The Public Records Officer shall process all requests in a timely fashion, in order of receipt, without regard to the nature of the records or identity of the requester.
- (2) It is the goal of the school district to provide the public with records at no or minimal cost whenever possible. The Superintendent shall develop clear guidelines regarding when it is appropriate to charge fees.
- (3) The district recognizes that it is in possession of sensitive and confidential information about our students, staff and families. In responding to public records requests, the district will weigh the need for transparency with the need to protect confidentiality. The district will balance these values in accordance with the provisions of ORS Chapter 192 and the Attorney General's Public Records Manual.
- (4) When public records are requested that could be considered exempt under one of the conditional exemptions laid out in ORS 192.501 and ORS 192.502 the district shall operate under the presumption that the records are public and should be disclosed unless there are clear legal or business reasons not to.
- (5) The Public Records Officer shall make determinations as to whether a legal exemption applies to a record in coordination with the General Counsel. The Superintendent will make the final decision in all cases where the Public Records Officer and/or General Counsel recommend withholding disclosure based on a legal exemption, and shall develop clear guidelines as to how the district will make such decisions.
- (6) Such records shall be made available to persons with disabilities in an appropriate format on request in accordance with the requirements of the Americans with Disabilities Act. No fee to cover the costs of providing records in

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an alternative format shall be charged. All other actual costs may be recovered, consistent with district policies regarding fees.

- (7) If the district requires clarification from the requester, such clarification shall be requested in writing, and the requestor shall be informed that work on the request will stop until the clarification is received.

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- (8) Requesters who believe the district has inappropriately withheld records or assessed fees may appeal such decisions to the Board, who will issue an opinion within seven days, or to the Multnomah County District Attorney. The availability of an appeal to the Board does not preclude a requester from appealing a denial directly to the District Attorney rather than to the Board.

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Legal References: ORS 192; ADA, 1990, 42 U.S.C. Section 12101 et seq. 29 CFR Part 1630

History: Adpt 12/8/80; Amd 1/84; Amd 9/9/02; BA 2418

2.50.010-P Public Access to District Records

In order to promote transparency and provide an accurate accounting of how the district carries out the public's business it is the intent of the board that all district records should be disclosed upon request even if an exemption could apply, unless the district is prohibited by law from disclosing the information or disclosure of the information could create significant and likely legal, physical or business harm to the district, students, staff, or facilities. The district shall rely upon the definition of "Public record" laid out in ORS 192.410(4)(a). Public records will be provided promptly and courteously for inspection upon request.

- (1) The Superintendent shall hire a Public Records Officer and develop administrative directives and procedures to provide clarity and consistency to the public about access to public records, laws regarding public records, and internal processes. The Public Records Officer shall process all requests in a timely fashion, in order of receipt, without regard to the nature of the records or identity of the requester.
- (2) It is the goal of the school district to provide the public with records at no or minimal cost whenever possible. The Superintendent shall develop clear guidelines regarding when it is appropriate to charge fees.
- (3) The district recognizes that it is in possession of sensitive and confidential information about our students, staff and families. In responding to public records requests, the district will weigh the need for transparency with the need to protect confidentiality. The district will balance these values in accordance with the provisions of ORS Chapter 192 and the Attorney General's Public Records Manual.
- (4) When public records are requested that could be considered exempt under one of the conditional exemptions laid out in ORS 192.501 and ORS 192.502 the district shall operate under the presumption that the records are public and should be disclosed unless there are clear legal or business reasons not to.
- (5) The Public Records Officer shall make determinations as to whether a legal exemption applies to a record in coordination with the General Counsel. The Superintendent will make the final decision in all cases where the Public Records Officer and/or General Counsel recommend withholding disclosure based on a legal exemption, and shall develop clear guidelines as to how the district will make such decisions.
- (6) Such records shall be made available to persons with disabilities in an appropriate format on request in accordance with the requirements of the Americans with Disabilities Act. No fee to cover the costs of providing records in

an alternative format shall be charged. All other actual costs may be recovered, consistent with district policies regarding fees.

- (7) If the district requires clarification from the requester, such clarification shall be requested in writing, and the requestor shall be informed that work on the request will stop until the clarification is received.
- (8) Requesters who believe the district has inappropriately withheld records or assessed fees may appeal such decisions to the Board, who will issue an opinion within seven days, or to the Multnomah County District Attorney. The availability of an appeal to the Board does not preclude a requester from appealing a denial directly to the District Attorney rather than to the Board.

Legal References: ORS 192; ADA, 1990, 42 U.S.C. Section 12101 et seq. 29 CFR Part 1630

History: Adpt 12/8/80; Amd 1/84; Amd 9/9/02; BA 2418

Proposed Amendments to Policy 2.50.010-P

1) Proposed Amendment to 2.50.010-P(8) as follows:

(8) Requesters who believe the district has inappropriately withheld records or assessed fees may request an expedited review of such decisions by the Board, which will decide whether to hear the appeal and, if it does, issue a decision within 30 days. The Board's procedures will preserve the confidentiality of the records in question during such an appeal.

Requesters retain their statutory right to request such review from the Multnomah County District Attorney, and the availability of an appeal to the Board does not preclude a requester from appealing a denial directly to the District Attorney rather than to the Board.

2) Proposed Amendment to 2.50.010-P(3) as follows:

(3) The district recognizes that it is in possession of sensitive and confidential information about our students, staff, and families. Upon receiving a public records request seeking potentially sensitive, personal, or private information related to a staff member the district shall notify the staff member and the staff member's union (if represented) in writing of the existence and nature of the records request. In responding to public records requests, the district will follow state and federal law.

X.XX.XXX-P Maintaining Professional Staff/Student Boundaries

For the purpose of this policy, “staff” or “staff member” includes district employees, as well as volunteers and contracted service providers. Staff will maintain the highest professional, moral, and ethical standards in their conduct with students. The interactions and relationships between staff and students should be based upon mutual respect and trust; an understanding of the appropriate boundaries between adults and students in an educational setting and in education-related activities; and consistent with the educational mission of Portland Public Schools. Although staff should have a sincere interest in helping students succeed, partiality and the appearance of impropriety must be avoided. Excessive informal and/or social involvement with individual students is prohibited. Such conduct is not compatible with professional ethics and will not be tolerated.

Guidelines for Staff Behavior

Staff are expected to use good judgment in their relationships with students both inside and outside of the school context. Staff shall complete the annual Sexual Conduct training provided by the District in order to have an understanding of appropriate boundaries. Staff shall refrain from certain behaviors recognized as “boundary invading” behaviors that could lead to inappropriate staff-student relationships. A Boundary invading behavior is an act, omission, or pattern of such behavior by a school employee or other adult that invades or is designed to result in an invasion of a student’s physical or emotional boundaries, does not have a legitimate educational purpose, and results in abuse of the staff/student professional relationship

Staff should maintain an appropriate professional student-staff relationship by:

1. Not demonstrating or expressing professionally inappropriate interest in a student’s personal life;
2. Not accepting, giving, or exchanging romantic or overly personal gifts or notes with a student;
3. Denying friend or follow requests from students on any digital accounts outside of PPS approved accounts and not sending friend or follow requests to students from personal accounts;
4. Reporting to staff member’s supervisor if staff member has reason to believe a student is or may be becoming romantically attached to the staff member; and
5. Observing appropriate adult boundaries with students in conduct and conversations at all times. Staff shall promote the equal treatment of all students and shall not have “special” relationships with a particular student.
 - a. For example staff shall not:
 - (1) For non-guidance/counseling staff, encourage students to confide their personal or family problems and/or relationships. If a student initiates

- such discussions, staff members are expected to refer the student to appropriate guidance/counseling staff;
- (2) Favor students by giving them special privileges, exchanging gifts or other favors, or having secrets with students;
 - (3) Take a student alone on outings;
 - (4) Show pornography to a student;
 - (5) Socialize where students are consuming alcohol, drugs or tobacco;
 - (6) Discuss/write about sexual topics unrelated to curriculum with students, make sexual jokes and innuendos, or engage in inappropriate banter with students;
 - (7) Invade the student's privacy (*e.g.*, walking in on the student in the bathroom);
 - (8) Make inappropriate physical contact, such as hugging, rubbing a student's shoulders, tickling, touching a student's hair, etc;
 - (9) Addressing students or permitting students to address staff members with personalized terms of endearment, pet names, or otherwise in an overly familiar manner;
 - (10) Disclose personal, sexual, family, employment concerns, or other private matters to one or more students;
 - (11) Invite individual students to the staff member's home without proper chaperones and parental notice;
 - (12) Go to the student's home without parent/guardian supervision;
 - (13) Maintain personal contact with a student outside of school by phone, email, Instant Messenger or Internet chat rooms, social networking Web sites, and other social media platforms, or letters (beyond homework or other legitimate school business) without including the building administrator/supervisor and parent/guardian;
 - (14) Transport students in the staff member's personal vehicle without authorization from school;
 - (15) Meet with individual students behind closed doors and out of "line of sight" supervision; or
 - (16) Date students, even if the student is no longer a minor.

Staff are expected to be sensitive to the appearance of impropriety in their conduct with students. Staff are encouraged to discuss issues with their building administrator, counselor, Title IX coordinator, or supervisor whenever they are unsure whether particular conduct may constitute a violation of this policy.

Responsibility to Report Possible Violations

Staff members are required to promptly notify the appropriate building administrator, the Title IX Coordinator, and Human Resources if they become aware of a situation that may constitute a violation of this policy.

Students and/or parents/guardians are strongly encouraged to notify the principal or other appropriate administrator if they believe a staff member may be engaging in conduct that violates this policy. Reports may be made anonymously.

Any staff who has reasonable cause to believe that another staff member has engaged in sexual conduct with a student must immediately notify their immediate supervisor. The immediate supervisor is required to report any notification by an employee to the General Counsel office, Human Resources, and the Title IX Coordinator. Additionally, any staff who has reasonable cause to believe that another staff member has engaged in sexual conduct with a student must fulfill the mandatory reporting requirements to DHS.

Disciplinary Action

Violations of this policy shall result in disciplinary action up to and including dismissal.

Training

The Superintendent or his/her designee is authorized to develop training, which shall be mandatory for all staff.

