TITLE VI RECORD-KEEPING POLICY

I. INTRODUCTION. The purpose of this policy is to ensure compliance with Title VI of the federal Civil Rights Act of 1964 which prohibits discrimination based on actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, pregnancy-related conditions, and lactation), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other protected characteristic, in programs and activities receiving federal financial assistance. This policy outlines procedures for maintaining accurate and complete records related to Title VI compliance.

Prudent safekeeping of such records upholds the school's Capstone Virtues of Prudence and Justice. This comprehensive record-keeping Policy addresses all Title VI records from their creation to disposal, is in keeping with Liberty Common School's historic and ongoing commitment to these virtues, and its commitment to compliance with applicable state and federal laws.

II. SCOPE. This Policy applies to creating, sharing, storing, and destroying records of alleged or known discrimination occurring on LCS property, and/or at LCS-sanctioned events or programs off-school property such as study-abroad programs, fieldtrips, or internship programs.

III. STATEMENT REGARDING PRIVACY. LCS endeavors to protect the privacy of all individuals involved in a report of alleged or known discrimination. Any data collected and recorded under this Policy is shared only as allowed by law and only as necessary to comply with Title VI of the federal Civil Rights Act of 1964, other relevant federal and state law, and applicable school policy.

IV. RECORD-KEEPING REQUIREMENTS.

1. Complaint Records. LCS maintains records of all complaints alleging discrimination based on Title VI of the federal Civil Rights Act of 1964. Complaint records shall include:
    a. Name of complainant and parent/guardian, if applicable;
    b. Complainant's contact information;
    c. Complainant's status (student, staff member, other);
    d. Date and time of complaint receipt;
    e. Description of alleged discrimination including witnesses; and,

f. Investigation findings and resolution.

2. Investigation Records. LCS maintains records of all investigations conducted in response to complaints. Investigation records shall include:
    a. Date and scope of investigation;
    b. Names and contact information of witnesses and parties involved;
    c. Evidence collected and analyzed; and,
    d. Findings and conclusions.

3. Training Records. LCS maintains records of training and technical assistance on Title VI provided to the School. These records shall include:
    a. Date and location of training;
    b. Training participants;
    c. Topics covered; and,
    d. Materials and resources used.

V. RETENTION AND DISPOSITION.

1. Retention Period. LCS will retain records for a minimum of seven years from the date of creation. Records are securely stored in accordance with federal and state regulations.

2. Disposal. LCS professionally destroys records in accordance with federal and state regulations. This means LCS ensures records are assiduously shredded when appropriate and sensitive information is safe-guarded at all times.

Liberty Common School does not discriminate in its working or learning environments on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, pregnancy-related conditions, and lactation), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances.

LCS does not discriminate on the basis of disability in violation of Section 504 regulations.

Reports of discrimination may be made orally or in writing to any professional classroom instructor, administrator, and/or the School's Director of Policy and Compliance:

Sarah Hunt
Director of Policy and Compliance, Liberty Common School
2745 Minnesota Dr. Fort Collins, CO 80525
970-672-5511
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