



TITLE IX POLICY: PREVENTION AND RESPONSE TO SEX DISCRIMINATION, HARASSMENT, AND MISCONDUCT

General Belief (New)	The Providence Public School PPSD (PPSD) is committed to providing a safe, supportive, and equitable learning and working environment for all students and employees. The Providence Public School Department affirms that every individual has the right to an education and employment environment free from discrimination, harassment, and retaliation based on sex, gender identity, gender expression, or sexual orientation. Our goal is to promote an inclusive climate in which students, staff, and families feel safe, respected, and empowered to report concerns without fear of reprisal. Equity and accountability are foundational to student success and PPSD excellence. Furthermore, in alignment with our mission and vision, the Providence School Department strictly prohibits any form of sexual harassment or gender-based misconduct and holds all members of the school community responsible for maintaining an atmosphere of dignity and respect.
Purpose and Scope (New)	This policy is established to: • Comply with Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.) and its implementing regulations (34 C.F.R. Part 106); • Prevent and address discrimination and harassment on the basis of sex in all educational programs, activities, and employment practices; • Ensure that all complaints are handled promptly, fairly, and impartially. This policy applies to: • All students, employees, applicants, volunteers, contractors, and visitors of PPSD; • All school-sponsored activities, programs, and operations, whether on or off PPSD property, and includes online conduct that creates a hostile environment or limits participation in PPSD programs.
Definitions (Expanded from 8 to 23)	The following definitions are provided to assist in understanding this policy and the legal obligations of PPSD. • Advisor. An Advisor is an individual selected by a party to assist them throughout the resolution process. The Advisor can be anyone, including an attorney or a parent. • Appeal Decision-maker: The person who accepts or rejects a submitted appeal request, determines whether any of the appeal grounds are met, and directs responsive actions(s) accordingly

	● Complainant. The person who is alleged to be the victim of conduct that could constitute sexual harassment or sex discrimination. A Complainant must be participating in or attempting to participate in PPSD’s educational program or activity at the time of their complaint. ● Decision-maker: An individual appointed by the school department charged with making a final decision of responsibility regarding a formal complaint. The Decision-maker cannot be the Investigator or the Title IX Coordinator. If one or both of the parties appeals the Final Determination, PPSD must use a different Decision-maker to preside over the appeal process. ● Discrimination. Treating persons differently or subjecting them to adverse treatment on the basis of sex (including gender identity and sexual orientation under current regulations). ● Education Program or Activity. Locations, events, or circumstances where PPSD exercises substantial control over both the Respondent and the context in which the Sexual Harassment, Retaliation, and/or other Prohibited Conduct occurs. ● Employee. A person employed by PPSD. ● Final Determination. A conclusion by the preponderance of evidence that the alleged conduct did or did not violate the Policy. The Decision-maker is responsible for issuing the Final Determination. ● Finding. A conclusion by the preponderance of evidence that the conduct did or did not occur as alleged (as in a “finding of fact”). The Title IX Coordinator issues the Finding through their Investigation Report. ● Formal Complaint. A document filed by a Complainant or signed by the Title IX Coordinator alleging a Respondent engaged in Sexual Harassment, Retaliation, and/or Prohibited Conduct under the Policy and requesting that PPSD investigate the allegations. ● Formal Resolution Process. PPSD’s method of formal resolution to address Sexual Harassment, Retaliation, and/or other Prohibited Conduct. ● <u>Incident Report Form.</u> Initial report made by the school or department (or any other person) when notified of a potential Title IX complaint. ● Investigator: A person or entity designated by PPSD to conduct prompt, thorough, and impartial investigations of sex discrimination, sexual misconduct, and/or reports, including: identifying and interviewing parties and witnesses; identifying, organizing, and compiling relevant information; maintaining accurate and thorough investigation records and notes; and writing clear, concise, and comprehensive investigation reports. The Title IX Coordinator can also serve as the investigator. ● Investigation Report. The Investigator’s written summary of all relevant evidence gathered during the investigation. ● Mandated Reporter. A PPSD employee who is obligated by Policy to share knowledge, Notice, and/or reports of Sexual Harassment, Retaliation, or Other Prohibited Conduct with the Title IX Coordinator. <i>Not to be confused with those mandated by state law to report child abuse to appropriate officials, though these responsibilities may overlap with those who have mandated reporting responsibility under this Policy.</i>
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	● Prohibited Conduct. Behaviors such as bullying or retaliation which may be subject to PPSD’s Title IX Policy when they are alleged to have been committed on the basis of sex and could constitute Sexual Harassment (Hostile Environment), if proven. ● Respondent. An individual who has been reported to be the perpetrator of conduct that could constitute Sexual Harassment. ● Retaliation: Any adverse action taken against a person for reporting, assisting, or participating in a Title IX grievance process. ● Sex. Birth sex, including sex stereotypes, characteristics, sexual orientation, and gender identity. ● Sexual Harassment (as defined under 34 C.F.R. § 106.30). Includes any of three types of misconduct on the basis of sex, all of which jeopardize the equal access to education that Title IX is designed to protect: ○ Any instance of quid pro quo harassment by PPSD’s employee; ○ Unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal educational access to PPSD’s Education Program or Activity; ○ Any instance of sexual assault, dating violence, domestic violence, or stalking. ● Student. Any individual who is participating or attempting to participate in PPSD’s education program or activity, and who maintains an ongoing relationship with PPSD. ● Supportive Measures: Non-disciplinary, non-punitive individualized services offered as appropriate to restore or preserve equal access to education or work. ● Title IX Coordinator: An individual designated by PPSD to ensure compliance with Title IX of the Education Amendments of 1972 (34 C.F.R. Part 106) and PPSD’s Title IX Board Policy.
Guidelines and Implementation Strategies (New)	The Superintendent will develop administrative procedures (also known as regulations) to implement the Title IX Policy: Prevention and Response to Sex Discrimination, Harassment, and Misconduct (Policy). The procedures should address each of the following: ● Reporting Requirements ○ Reports may be made in person, by phone, by email, or via the PPSD’s online reporting system. ○ Reports can be made at any time, including outside business hours, to the Title IX Coordinator or any PPSD administrator. ○ Anonymous reports are accepted, but they may limit PPSD’s ability to investigate, respond, and provide remedies, depending on what information is shared . ○ All employees who become aware of potential Title IX violations must promptly notify the Title IX Coordinator. ○ There is no time limit on filing a report or formal complaint to the Title IX Coordinator. ● Resolution Procedures

	○ Formal Complaints of Sexual Harassment, Retaliation, or Other Prohibited Conduct under the Policy will be resolved through the process outlined in the Title IX, EEO, Discrimination Resource Guide. ● Confidentiality and Non-Retaliation ○ All parties' privacy will be maintained to the fullest extent permitted by law. ○ Retaliation for filing a complaint or participating in an investigation is prohibited and will result in disciplinary action.
Training, Oversight, and Communication (expanded)	Training ● The Title IX Coordinator, investigators, decision-makers, and appeal decision-makers will complete annual training in Title IX law, impartial investigations, trauma-informed practices, and due process. ● All employees will receive annual training on recognizing, preventing, and reporting sexual harassment and sex discrimination. ● Students will receive age-appropriate instruction through the PPSD's health and social-emotional learning curriculum on respect, consent, and safe relationships. Oversight ● The Chief of Opportunity & Access shall oversee policy implementation and PPSD wide equity compliance. ● The Title IX Coordinator is responsible for ensuring PPSD's compliance with the Title IX of the Education Amendments of 1972, and related federal, state and other legal requirements. ● An annual Title IX Compliance Review will be conducted to assess data trends, training completion, and policy effectiveness. Communication ● The PPSD will post the Title IX Policy, Title IX Coordinator contact information, training materials, and procedures on its website and in student/staff handbooks. ● Schools will display visible posters and digital notices with reporting information and QR codes. ● The PPSD will share reminders via newsletters, training, and family engagement events.
Compliance with Laws, Confidentiality Requirements	The PPSD complies with Title IX of the Education Amendments of 1972, Title VII of the Civil Rights Act of 1964, Title VI of the Civil Rights Act of 1964, the Rhode Island Fair Employment Practices Act (R.I. Gen. Laws § 28-5.1-1 et seq.), and all relevant U.S. Department of Education (OCR) regulations.

	The Title IX Coordinator shall maintain required records, and compliance with the Title IX of the Education Amendments of 1972, and related federal, state and other legal requirements. Individuals found to have violated this policy shall be subject to disciplinary measures, up to and including termination or expulsion, consistent with PPSD policy and collective bargaining agreements. The Superintendent will ensure that all PPSD employees and all PPSD contractors comply fully with all applicable laws, rules, and regulations, and with all Board policies. In the event any part of any policy is unlawful, the Superintendent will report such an event to the Board as soon as practicable and request of the Board, a modification of the policy.
Legal Reference	• Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 et seq. • Title IX Final Rule 2020 • Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. • Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. • Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g • Violence Against Women Reauthorization Act (VAWA) of 2022 • Rhode Island General Laws § 16-38-1, Equal Opportunity in Education • Rhode Island Fair Employment Practices Act, R.I. Gen. Laws § 28-5.1-1 et seq. • R.I. Department of Education Regulations Governing Non-Discrimination and Equal Access in Education
Cross Reference	• Providence School Department Standard Procedures and Policies Guidebook for Title IX, EEO, and Non-Discrimination • PPSD Title IX, EEO, and Non-Discrimination SOP • PPSD Affirmative Action and EEO Policy • PPSD Bullying and Harassment Policy • PPSD Dating Violence/Sexual Violence Policy • PPSD Professional Conduct with Students Policy • PPSD Staff Handbook • PPSD Student Code of Conduct Policy • PPSD Transgender/NonDiscrimination Policy • PPSD Workplace Gender Transition Policy • PPSD Student Attendance Policy • PPSD Student Discipline Policy • BPS Title IX Policy • LAUSD Title IX Policy
History	Approved by Board: Amended: December 11, 2025 Approved by Board: January 7, 2026