Faculty & Staff Handbook

Interdistrict School for Arts and Communication

190 Governor Winthrop Boulevard
New London, CT 06320
Phone: 860.447.1003
Fax: 860.447.0470
www.isaacschool.org

2026-2027

Board Approved August 14, 2026

2026-2027 ISAAC Faculty and Staff

ADMINISTRATION

Dr. Nicholas J. Spera
Executive Director

Mercedes Alger
Principal

Maria DePino-Wallig
Assistant Principal

Amy J. Geary
Director of Special Education

Mike Presti
Dean of Academics & Athletics

ISAAC FACULTY

LEADERSHIP

Janice Ricketts
Student Supports Coordinator

Brian Trost
Director of Information Technology

Carrie Gregory
Director of Nursing Services

Celestino Rodriguez
Director of Maintenance & Facilities

Erica Robb
Director of Finance

Bobby Harris
Dean of School Security, Safety, & Residency

LANGUAGE ARTS

Madeline Gellatly, *4th & 5th Grade*
Nicole Litterio, 6th *Grade*
Amy Taylor, 7th *Grade*
Kendall Chrzanowski, 8th *Grade*

MATHEMATICS

Lauren Vigorito, *4th & 5th Grade*
William Ferguson*, 4th & 6th Grade*
Shannon Lougee, 6th *Grade*
Vanessa Kobyluck, 7th *Grade*
Lauren Kang, 7th Grade
Amy Wilkes, 8th *Grade*

SOCIAL STUDIES/HUMANITIES

Rebecca Conti, *4th & 5th Grade*
Nicole Funk, 6th *Grade*
Kevin Irvine, 7th *Grade*
Michael Presti 8th *Grade*

SCIENCE

Ryleigh Gonyo, *4th & 5th Grade*
Emilee Cruz, *6th Grade*
Tiffany Devlin-Perry, 7th *Grade*
Lisa Lazarou, 7th Grade
Denise Florio, 8th *Grade*

UNIFIED ARTS & ELECTIVES

Tiffany Devlin-Perry, *Aquarium Science*
Amanda Grundy, *Dance/Theater*
Jessica Harvey, *PE/Health*
Aaron Kane, *Digital Arts/Coding*
Bryttnie Olsen, *Art, Advanced Art*
Christina Schiano, *Spanish*
Hannah Thompson, *Music/Band/Chorus*

SPECIAL EDUCATION

Mary Polatschek*, Literacy Teacher*
Allison Cyr*, Literacy Teacher*
Olivia Pacheco, *4th-5th Grade*
TBD, 4th & 5th Grade
Kimbery Pesarik, *6th Grade*
Peter Gonski, *6th Grade*
Jannine Moores, *7th Grade*
TBD, *7th & 8th Grade*
Annaliisa Erickson, *8th Grade*

BILINGUAL PROGRAM

Christina Schiano, Bilingual Coordinator/*TESOL Teacher*
Alexis Perez-Canas, *Bilingual Educational Assistant*

STUDENT SUPPORT SERVICES

Janice Ricketts*, Student Supports Coordinator*
Kathryn Di Garbo, *School Psychologist*
Amanda Giorno, *School Psychologist*
Lisa Lazarou*, MTSS Coordinator/Core Instructional Coach*
Jordan Buscetto, *School Counselor*

SAFETY STAFF & EDUCATIONAL INTERVENTIONISTS

Bobby Harris
Patrick Hawes
Norman Harrison
Michael Kydd
Jerry Santiago

ADMINISTRATIVE ASSISTANTS

Mildred Rivera**,** *Executive Assistant*
Jereidi Alvarez, *Executive Administrative Assistant*

HEALTH SERVICES

Carrie Gregory**,** *Director of Nursing Services*
Kelly Surprenant, *School Nursing Assistant*

Introduction

The purpose of this handbook is to provide ISAAC employees with a summary of employee policies and guidelines. Please read and review these policies and guidelines carefully.

The ISAAC Staff Handbook replaces any earlier versions of the ISAAC Employee Handbook. This handbook may be revised as needed without any prior notice as business, employment, legislative, and/or economic conditions dictate. Any such revisions apply to all ISAAC employees and will be communicated to all employees.

The ISAAC Staff Handbook is not a contract or any part of a contract of employment, express or implied.

Disclaimer for Policies

This handbook is not intended to substitute, replace, override, or modify existing federal and state laws, regulations, policies, or express terms of a collective bargaining agreement, not be inclusive of every policy. Such policies and agreements are subject to change. Therefore, the most current version of those laws, policies, and agreements shall always be the official documents upon which a ruling will be based or interpretation made. This Disclaimer applies to any and all policies.

ISAAC is an equal-opportunity employer. All aspects of employment including the decision to hire, promote, discipline, or discharge, will be based on merit, competence, performance, and business needs. We do not discriminate on the basis of race, color, religion, marital status, age, national origin, ancestry, physical or mental disability, medical condition, pregnancy, genetic information, gender, sexual orientation, gender identity or expression, veteran status, or any other status protected under federal, state, or local law.

General Information

ISAAC Main Office Hours

Monday-Friday
8:00am-4:00pm

ISAAC Main Office Phone Number

860-447-1003

ISAAC Website

www.isaacschool.org

CORE VALUES AND BELIEFS ABOUT LEARNING

At ISAAC Middle School, we pride ourselves on fostering a safe, fun, and nurturing environment that promotes hard work, happiness, and effort for all who work, learn, and grow within our school community. We believe that *All Students Can Succeed* with high expectations, maximum effort, and a growth mindset. Our success as an ISAAC Family is deeply rooted in the positive relationships shared among our diverse student body, devoted staff, and engaged families. Our professional learning community of talented and passionate educators is committed to the delivery of a rigorous and innovative curriculum, which promotes the shared belief that *Effort Creates Ability*. We support the growth of each student by developing the academic, civic, and social skills essential to succeed in high school and beyond.

THE ISAAC VISION OF THE GRADUATE

The ISAAC Vision of the Graduate is that all graduates are proficient in the following competencies:

- Write effectively for various purposes
- Speak to diverse audiences in an accountable manner
- Develop the behaviors needed to interact and contribute with others on a team
- Analyze and solve problems independently and collaboratively
- Be responsible, creative, and empathetic members of the community

GRADES 6,7,8 BELL SCHEDULE

TIMES		FULL DAY SCHEDULE DRAGON DAYS- Monday/Tuesday/Thursday/Friday ADVISORY-Wednesday
START	**END**	**BLOCK**
8:30	9:45	Block 1/5 (75 min)
9:48	11:03	Block 2/6 (75 min)
11:06	12:51	Block 3/7
11:03-11:33		*Grade 6 Lunch*
11:42-12:12		*Grade 7 Lunch*
12:21-12:51		*Grade 8 Lunch*
12:54	2:09	Block 4/8 (75 min)
2:12	3:00	Dragon Time/Advisory (48 min)

TIMES		HALF DAY SCHEDULE No Advisory on Early Dismissal Days
START	**END**	**BLOCK**
8:30	9:18	Block 1/5 (48 min)
9:21	10:09	Block 2/6 (48 min)
10:12	11:00	Block 4/8 (48 min)
11:00	12:15	Block 3/7
11:00-11:20		*Grade 6 Lunch*
11:28-11:48		*Grade 7 Lunch*
11:55-12:15		*Grade 8 Lunch*

TIMES		2-HOUR DELAYED OPENING SCHEDULE DRAGON DAYS- Monday/Tuesday/Thursday/Friday ADVISORY-Wednesday
START	**END**	**BLOCK**
10:30	11:10	Block 1/5 (40 min)
11:10	12:44	Block 3/7
11:10-11:40		*1st Lunch*
11:42-12:12		*2nd Lunch*
12:14-12:44		*3rd Lunch*
12:46	1:27	Block 2/6 (41 min)
1:29	2:10	Block 4/8 (41 min)
2:12	3:00	Dragon Time/Advisory (48 min)

GRADES 4-5 BELL SCHEDULE

TIMES		FULL DAY SCHEDULE
START	**END**	**BLOCK**
8:30	8:45	Morning Meeting (15 min)
8:48	9:53	Block 1 (65 min)
9:56	11:01	Block 2 (65 min)
11:04	12:09	Block 3 (65 min)
12:09	12:49	Lunch/Recess (40 min) *JV Lunch Wave/Varsity Recess: 12:09-12:29 (20 min)* *Varsity Lunch Wave/JV Lunch: 12:29-12:49 (20 min)*
12:52	1:57	Block 4 (65min)
2:00	2:20	Dragon Time (20 min)
2:20	3:00	Unified Arts (40 min)

TIMES		HALF DAY SCHEDULE
START	**END**	**BLOCK**
8:30	9:15	Block 1 (45 min)
9:18	10:03	Block 2 (45 min)
10:06	10:51	Block 4 (45 min)
10:54	11:39	Block 3 (45 min)
11:40	12:15	Lunch/Recess *JV Lunch/Varsity Recess: 11:40-12:00 (20 min)* *Varsity Lunch/JV Recess: 12:00-12:15 (15 min)*

TIMES		2-HOUR DELAYED OPENING SCHEDULE (Grades 4-5)
START	**END**	**BLOCK**
10:30	11:30	Block 1 (60 min)
11:30	1:00	Block 3 (60 min) *JV Lunch/Varsity Recess: 11:30-12:00 (30 min)* *Varsity Lunch/JV Recess: 12:30-1:00 (30 min)*
1:00	2:00	Block 2 (60 min)
2:00	3:00	Block 4 (60 min)

DATES FOR QUARTER ENDINGS & POWERSCHOOL UPDATES

Quarter One

08/19/2026– 10/23/2026

10/23/26	Late Work Acceptance Deadline
10/23/26	End of Quarter One
10/30/26	Grades Due
11/06/26	Report Cards Finalized

Quarter Two

10/24/2026 – 12/23/2026

12/23/26	Late Work Acceptance Deadline
12/23/26	End of Quarter Two
01/08/27	Grades Due
01/15/27	Report Cards Finalized

Quarter Three

12/24/2026 – 3/19/2027

03/19/27	Late Work Acceptance Deadline
03/19/27	End of Quarter Three
03/25/27	Grades Due
04/02/27	Report Cards Finalized

Quarter Four

3/20/2027 – 5/28/2027

05/26/27	Late Work Acceptance Deadline
05/28/27	End of Quarter Four
05/28/27	Grades Due
05/28/27	Report Cards Distributed

Parent/Teacher Conferences

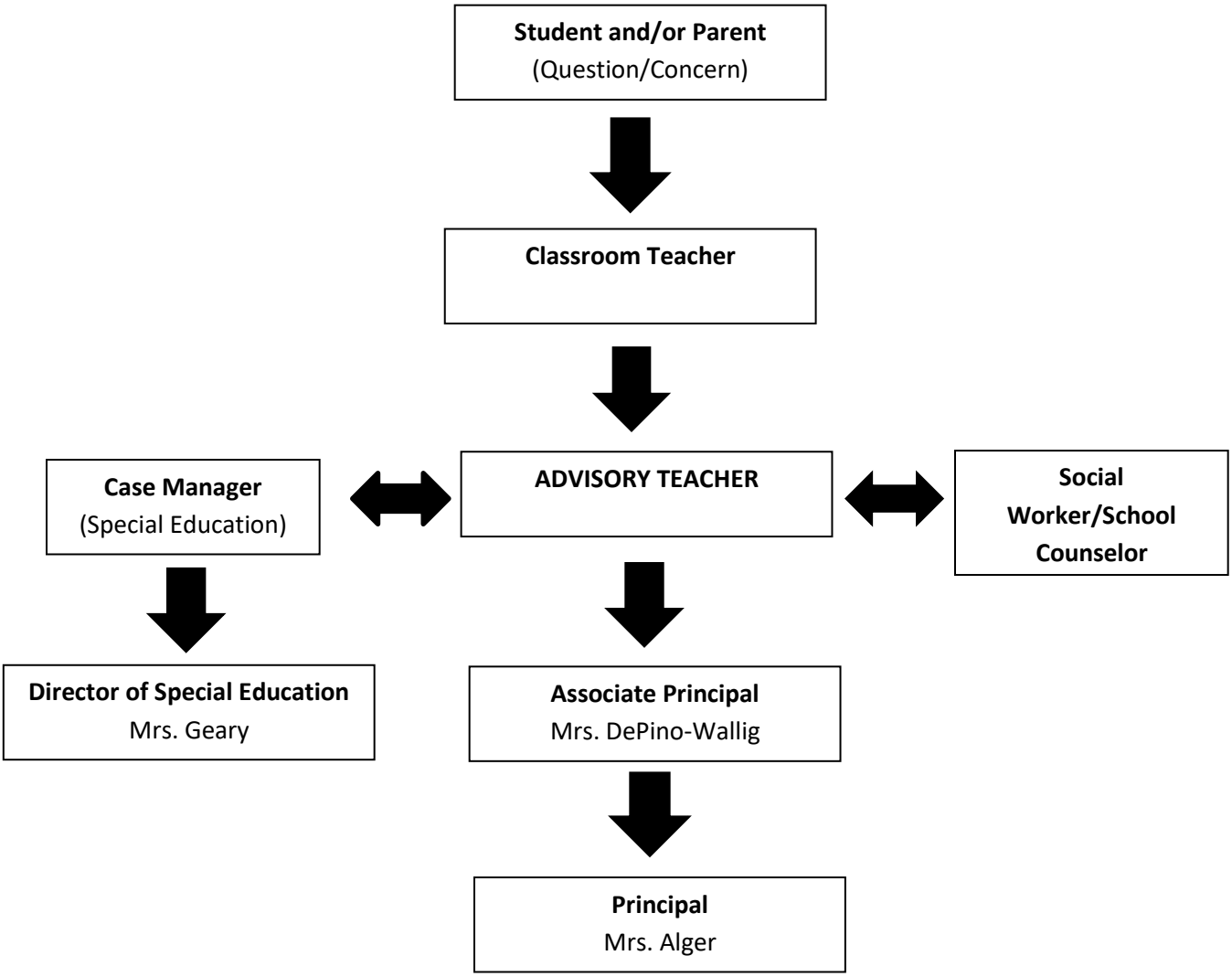
09/24/26	Open House
10/08/26	Virtual Parent Conference
04/22/27	Virtual Parent Conference

*All teachers update PowerSchool in a timely fashion to promote communication with families and provide adequate opportunities for improvement where needed. Teachers will provide information on **Open House (09/24/2026)** explaining their grading policy and approximate PowerSchool updates

ISAAC Communication Flow Chart

Parent-School Communication Plan:

The Interdistrict School for Arts and Communication encourages students and parents to take every opportunity to foster positive dialogue with faculty and staff (see flow chart below). In the event a question or concern arises, students and parents should make their first contact with the classroom teacher. If the situation remains unsolved, the student and/or parent should then seek conversation with the social workers or case manager (for special education students). Should the situation continue to be an issue, students and parents should contact ISAAC Administration beginning with Maria DePino-Wallig, Assistant Principal or Amy Geary, Director of Special Education, followed by the ISAAC Principal, Mercedes Alger.



ISAAC FACULTY AND STAFF

Absence From School

If teachers expect to be absent from school, they should notify Mercedes Alger in advance as soon as possible so arrangements can be made for substitutes. If ill, teachers should contact Mercedes Alger prior to 10:00 p.m. the evening before or after 5:00 a.m. the morning of the absence. Teachers must call or text **Mercedes Alger** at **860.575.2735** in addition to submitting your absence on Frontline.

Please note: All teachers should have an up-to-date substitute file available. This should include a list of all assignments including advisory and collaterals, seating charts, class lists, and three days of emergency lesson plans.

All other employees should contact their direct supervisors.

Activities

Requests for activities such as dances, dinners, etc., must be discussed with Mrs. Alger at least 45 days before the activity. The email request should include all of the pre-planning required including: permission slips, cost per student, the purpose of the activity, chaperones, and the number of anticipated participants. Final approval of all activities rests with an administrator.

Additional Classroom Resources

In keeping with ISAAC policies and regulations on curriculum and materials, speakers, topics and/or materials presented to ISAAC students and not provided by the school shall complement the curriculum. The Principal or designee shall review and approve material not provided by the school in relation to age appropriateness, content, and context prior to its use. All guest speakers must be approved by administration before plans are made with the guest speaker(s). Moreover, all movies or videos selected should be rated 'G' or 'PG' prior to administration approval. Content must be included in the proposal to administration at least 30 days before the requested date.

Advisory

All ISAAC students will take part in our Advisory Program where our Social-Emotional Curriculum will be implemented (i.e. growth mindset, mindfulness, healthy social and emotional living, etc.). We want to ensure that our students' social/emotional well-being is our top priority.

Arrival and Departure Times

Teachers are expected to be in the building at their designated/assigned location for 8:00 a.m. and remain on duty until 3:30 pm. Between class periods, teachers should do their best to remain inside or immediately outside their room to supervise students unless they have been assigned a collateral duty or are transporting students to another classroom. ***Rooms should not be left open and unsupervised.***

Open House

ISAAC Open House will be held on Thursday, September 24, 2026. This is an opportunity to communicate with parents about the happenings in your classroom.

Budget & Teacher Materials Reimbursement

The budget process is an organized system of steps that require input from teachers in collaboration with administration. Budget requests are granted once a year on or before March 1st of the school year. Depending on funding, impact for improving student performance, and its correlation to the ISAAC Core Values, all requests will be approved by your administrator. Small items for classroom activities may be at the expense of the classroom teacher. If a teacher requests reimbursement for an activity, they must have an itemized list of materials, a reason for the supplies, and meet with the building principal for approval two weeks prior to the activity. Receipts handed to office staff without prior approval will NOT be reimbursed. (See CLASSROOM SUPPLIES for other supplies)

Bulletin Boards, Websites and Showcases

Bulletin boards, websites, and showcases are assigned to departments and organizations within the school. ***Responsibility for content and condition of these boards and cases will belong to the department. These must be kept up to date. ALL WEBSITE CONTENT/INFORMATION THAT IS UPDATED OR CREATED MUST BE FORWARDED TO ADMINISTRATION.*** **All posters must be signed by administration prior to posting.**

Cafeteria

Food service is available in the cafeteria, provided by CEP, and at a cost per meal.

Cancellation of School

Inclement weather and difficult traveling conditions are not far off. For the safety of our staff and students, we will consider two options in the event of potentially hazardous traveling conditions on school mornings.

(1) Close school completely.
(2) Delay the opening of school for ***2 hours***. All morning bus schedules will be delayed for ***2 hours or more depending on the school district***. Schools will close at the regular time.

In the event that school is closed or delayed, the information will be communicated through the following outlets:

(1) A School Messenger and Parent Square message will be sent to your email address and cell/home phone.
(2) TV Stations: WTNH-TV (Channel 8) WFSB-TV (Channel 3)
FOX 61 (Channel 61) NBC 30-TV (Channel 30)
(3) Website: www.isaacschool.org

IF A STORM BEGINS DURING THE SCHOOL DAY and shows signs of developing into a potentially dangerous situation, schools will be closed early to enable us to get children home quickly and safely. Whenever possible, this call will be made ASAP. If a storm begins during the school day, a School Messenger telephone, Parent Square and email message will be sent to all contacts provided to us. Our website will display this information and TV stations will be notified as soon as possible.

Please Note:

- There may be times when the **weather worsens quickly and we have missed the window of time to officially call an early dismissal**. In this situation, we **may have the buses pick up students at school approximately 15 minutes earlier than normal** to allow more travel time for the buses under deteriorating conditions. The School Messenger emergency contact system will be implemented to send email and phone messages to all contacts provided to us to make you aware of the early dismissal.

- The Police Department recommends to parents that it is safer for children to take school buses on days of inclement weather than for parents to provide transportation since buses are equipped with snow tires and chains. This action also reduces the number of cars on the road and minimizes the possibility of mishap.

- ISAAC closings, delays and early dismissals mostly follow New London Public Schools.

Chaperoning Student Functions

The presence of chaperones at school social activities signifies the interest members of the faculty have in student affairs. Mutual respect and courtesy is expected so that students and chaperones can enjoy a social evening together. All chaperones must be staff members of ISAAC. The number of chaperones will be determined by administration upon approval of the activity. Chaperones should be committed to covering the activity for the duration of the activity. The names must be given to the administration no later than one week prior to the activity; the activity will be cancelled in the event there are not enough chaperones. Arrival should take place one-half hour prior to the activity for instructions by the administrator on duty. Administration will dismiss sponsoring chaperones. Chaperones will be assigned by the administrator in charge to cover all necessary areas. These assignments may be rotated if coverage is needed.

Child Abuse

All staff members must report all known or suspected incidents of child abuse or neglect in accordance with ISAAC's Report of Suspected Abuse or Neglect of Children or Reports of Sexual Assault of Students by School Employees, which is included in the Required Notices section of this Handbook for your reference. All instances are to be reported to the administration, school social worker, or the school nurse. Statutorily mandated reporters must also submit a report to the Department of Children and Families, in accordance with state law and ISAAC policy.

Classroom Procedures

The following suggestions are offered as possible ways to initiate and maintain an appropriate classroom atmosphere in which learning can best occur:

1. Make a habit of being at the door as each class arrives. Do not allow students to congregate at the door either at the beginning or end of the class period. **Bell-to-bell instruction.**
2. **Take daily class attendance for all classes within the first few minutes of each class.** It is the responsibility of each teacher to maintain accurate records, send attendance via PowerTeacher and to report attendance to the main office in a timely fashion as directed by the administration.
3. *PowerTeacher is used to record absences and tardies for each class.*
4. Be prepared to start all classes on time. Have something for students to do immediately (i.e. TWPS, Do-Now).
5. Expect students to be ready for work with enough work to last the entire block.

6. Check desktops and furniture periodically (ideally after each period) for markings and defacement. Ask students to check the floor, desks, and furniture at the end of each period to remove litter. If this is done regularly, we can all play a part in keeping our school clean. It is also important that all teachers mutually cooperate in such efforts to establish uniformity and to show the students that we are proud of our school and take a personal interest in its cleanliness.
7. Students must have teacher permission to leave the classroom. Use good judgment in keeping track of the length of time a student is out of the room; notify the office for any student gone for more than 10 minutes.
8. Bells do not dismiss the class. Students are to be dismissed by the teacher.
9. Treat students with respect and expect the same treatment in return.
10. Create an atmosphere, in all your classes, in which a relevant exchange of ideas may take place using Accountable Talk.

Classroom Supplies

Teachers must give at least 72 hours notice on all requests for minor classroom supplies (markers, pens, *Post-It* notes, etc.). Teacher requests are to be submitted to the main office. If a teacher is interested in a major classroom supply or request, please submit to the main office administrative assistant a summary of the request, estimated cost, and reasoning of how it improves student academic achievement. All requests must be reviewed and approved by the building principal before an order is placed.

Collateral Assignments

Assigned collaterals will be provided at the beginning of each semester. Collateral assignments may include monitoring students in areas such as the cafeteria, stairwells, main hallway, etc. Teachers must be in their assigned collateral location at 8:00 a.m.

School Counseling Services

The mental health team is a resource that can be utilized by students and staff alike. In addition to relating to students on an interpersonal level, the mental health team stand ready to act as working partners with other teachers concerning those students who may not be functioning in a manner that is consistent with their ability. Very often, the mental health team can help an individual teacher to better understand a certain student's learning style or behavior and thus assist in providing intervention strategies that will help the student to function at a higher level. Also, the school psychologists or school counselor may be aware of certain situations in the student's past, which they may be able to share in accordance with the Family and Educational Rights and Privacy Act, and which might be a key to establishing a more productive learning environment for the individual.

Detention and Discipline

Teachers may assign after-school detentions to students as a classroom management or behavior management strategy. Teachers must contact the parent each time a warning or discipline issue occurs in the classroom. These steps should occur before a referral to the Principal or Assistant Principal's office occurs. **Office detentions may only be assigned by an administrator and in accordance with ISAAC's Student Discipline Policy**.

Email and ParentSquare Etiquette

It is important to always maintain a professional and courteous discourse when using email to correspond with parents, students, and co-workers. Please be appropriate and respectful at all times. In addition, be

cognizant of the 'REPLY ALL' option on distribution list emails. Distribution lists for 'All ISAAC Staff' and 'All ISAAC Teachers' are to be used only by administration and office staff unless approved by administration.

Evaluations

Teacher evaluation and professional development is a collaborative and continuous learning process between the evaluator and each teacher. One goal of evaluations is to promote the growth and improvement of educators' professional practice goals. Teachers will receive observations of professional practice from administrators with feedback opportunities throughout the school year.

Examinations and Testing

Although grades are not totally indicative of a student's progress, they do serve to measure that progress, based on his/her own ability and effort, and give an estimate of the student in comparison with his/her peers. These formative and summative assessments should provide teachers and the MTSS Team with progress monitoring information that is crucial to the success of our students at. Below are descriptions of formative and summative assessments.

Formative assessment implies that the results will be used in the formation and revision process of an educational effort. Formative assessment is a deliberate process used by teachers and students during instruction and/or through the use of analytic school-wide rubrics that are used to adjust teaching and learning strategies to improve students' self-assessment, reflection, and attainment of curricular learning targets/goals. Since educators are continuously looking for ways to strengthen their educational efforts, this type of constructive feedback is valuable.

S*ummative assessment is used for the purpose of documenting outcomes and judging value.* It is used for providing feedback to instructors about the quality of a subject or program, reporting to stakeholders and granting agencies, producing reports for accreditation, and marketing the attributes of a subject or program. Most studies of this type are rarely exclusively summative in practice, and they usually contain some aspects of formative assessment.

Teachers should administer tests or other forms of measurement frequently to substantiate the final grade. Unit summative assessments should be analyzed and reported through the format provided in professional development. Pre-assessment, content strands, and unit test data should be included in the format of summative assessments. **At the end of any marking period, there should be enough grades to present an accurate representation of the student's academic achievement.**

Extra Help

There are some students during the course of the year that will be in need of the service of the teacher beyond the normal classroom period. If students in your classes are not doing well academically, you should recommend to them to remain after school, come in early, or to receive additional assistance during Dragon Time.

Faculty Meetings

Faculty meetings will be held on Wednesdays as posted by the school principal.

Faculty Parking

All staff are asked to park in the Cornish parking garage next to ISAAC and/or the Holiday Inn parking lot. If a teacher chooses to park in the Cornish parking garage, the Board will pay up to $45 per car per month for teachers to park, the remaining monthly amount will be deducted from their pay. Teachers will be given a swipe card to allow entry into the garage which is managed by the Dean of Security. If there are any questions teachers can see the Dean of Security.

Field Trips

1. **Purpose of Field Trips**
    a. Field trips are intended to extend learning beyond the classroom. They should be articulated with instruction of the grade and subject level. Generally, it is expected that resources within a reasonable distance of New London will be used. Occasionally, resources at a distance best fit the requirement.

    b. Teachers should recognize that frequent or extended absences by pupils may seriously interfere with their obligations in other subject areas.

    c. Field trips are voluntary; alternative experiences for subject-oriented trips may be arranged.

2. **Field Trips in Connections with Class Instruction**
    a. The principal is authorized to approve field trips that are of significant educational value and will enhance the course of study. Request for field trip forms are available in the main office.

The ISAAC Board of Directors encourages the teaching staff to use the surrounding communities as teaching resources.

The following are guidelines for planning field trips that are part of and directly related to classroom learning activities:

1. All field trips planned to occur during the school day must be approved by the Principal.
3. Students may be asked to pay all or part of the expenses of field trips.
4. Bus transportation may be used when arrangements can be made. Use of private vehicles is discouraged.
5. Each student on a field trip shall have written parental permission from a parent/guardian from a signed slip given at the beginning of the year that encompasses all trips.
6. Each trip should be evaluated by students, teachers, and the administration.
7. No child shall be excluded from a field trip because of inability to pay.

PROCEDURES

- General requirements on field trips specifically in relation to:
    - Transportation requests
    - Written permission of parent or guardian
    - Trip involving use of parent transportation arrangements
    - Chaperone and adult supervision
    - Medical information (see below)
- Discuss arrangements and details with principal prior to initiating planning

- Complete Field Trip and Transportation Request Form and submit them to your principal and immediate supervisor
- Consult with your supervisor or principal regarding emergency notification procedures in the event of a problem with a trip.

Medical Procedures

Inform the nurse of the following information, 10 working days prior to a field trip.

- A list of all students going on the field trip
- The date the field trip is going
- The time leaving and returning
- Means of transportation, i.e. buses, vans

Arrange with the nurse when you will pick up the medical bag, review the medical alert list and practice use of an EPI PEN prior to your field trip departure. Work with the nurse to ensure compliance with ISAAC's Administration of Student Medication Policy.

Sign out the medical bag and leave a cell phone number in the Health Office and Main Office.

Attendance for Field Trips

The main office requires an e-mail containing the date, time and a list of the students leaving the school so this may be posted on the computer attendance list, and the absences of those students can be excused. If a student on the list is not going, notify the main office.

Fire, Evacuation and Lockdown Drills

School safety is an absolute priority at ISAAC. Detailed instructions for emergencies are posted in all areas of the school, and periodic practice drills are conducted by school staff. All students and staff are expected to familiarize themselves with emergency procedures and cooperate promptly and fully with school authorities in all emergencies and emergency drills. ISAAC will work with local emergency agencies to ensure proper procedures and precautions are in place for the safety of all students, faculty, and staff.

In the event of a fire drill, evacuation or lock down exercise, students must follow ALL instructions given by teachers and administrators. The New London Police Department, upon being notified, will quickly respond to the school to ensure student safety. Police officers will contain the incident and advise the administration and students of evacuation procedures. Students will be instructed to follow the directions of the police officers.

For all teacher responsibilities during fire, evacuation, and lockdown drills please refer to the ISAAC Emergency Safety & Crisis Plan.

First Aid and Illness Care

There is a trained person available throughout the day in the nurse's office at school. Contact the school nurse or the school health aide for assistance. If the nurse is not available, call the main office for assistance.

Students complaining of minor injury or illness may be sent directly to the nurse's office for evaluation and care. Students complaining of feeling faint, anyone who is unconscious, anyone who has a known or

suspected head, neck or back injury or has sustained a fall should NOT be moved until the injury/illness has been evaluated by a trained person.

Keep calm - call for assistance - use the classroom telephone to call the office.
Medical kits are located in each room for emergency purposes only.

Guest Speakers

Guest speakers may be invited to ISAAC and field trips may be scheduled with prior approval of the Executive Director. All visitors must report to the main office.

Hall Supervision Between Classes

All teachers should assist with hall supervision between classes. Receiving teachers should stand at their door to encourage punctuality to class. Others should encourage students to move along and not "visit" between classes. Teachers passing to their prep time or lunch should check the lavatories along the way.

Interdisciplinary Professional Learning Community (IPLC) Meetings

All teachers will engage in an interdisciplinary professional learning community meetings. Once a week, teachers will be involved in an IPLC meeting led by administration and/or the SRBI Coordinator. Teachers will receive their IPLC schedules at the beginning of each month.

Late Work

All teachers will accept late work one week prior to the end of the appropriate quarter as listed on the ISAAC calendar; 50% is the maximum penalty for a late submission. In order to be accepted, the work must be complete and meet all assignment requirements.

Leaving School Premises

Staff members are scheduled a block of time for preparing lessons, researching, analyzing data, meeting with administration, specialists, parents, administering make-up work to students as well as for other teaching responsibilities. ***Staff members who need to leave the building during their prep block must receive permission from administration and sign out at the main office.***

Length of Day (Teachers)

The school day for students is from 8:30 a.m. until 3:00p.m. Teachers are expected to be outside their classroom or at their morning duty/collateral by 8:00 a.m. with the teachers' school day ending at 3:30 pm. The principal may request teachers to remain after-school for purposes of faculty meetings, professional development, and individual meetings as outlined in the contract. Teachers are required to attend all meetings. No activities, including coaching responsibilities, should be scheduled to conflict with meetings. Other meetings that may be scheduled on other days, while important, do not require teacher attendance after the contract hours are completed. On such days, the teacher's first responsibility is to students who need additional instruction.

Mailboxes and Work Room

There is one faculty/staff workroom known as the "Pottery Barn" where copiers are available for staff. Teachers should not send students into a workroom to make or pick up copies. Each member of ISAAC has been assigned a mailbox located in "Pottery Barn". Students are not to be allowed access to staff mailboxes. All staff must check their own mailbox each morning and afternoon.

It is the expectation that teachers check their email throughout the school day including before school begins and after school ends.

Make-Up Work

Making up work is the responsibility of students, but it is a good idea to remind and encourage students to strive for early completion of missed work. All student absences from school must be verified by a parental telephone call or note. When students have been absent from school for legitimate reasons, they have the opportunity of completing work from their absence. As a general rule, you should allow a student a day for each day he or she was absent. (Tests, quizzes, and major projects may require multiple days.) If, however, you feel the students need more time, you may arrange the schedule with them. Under provisions of state law, students have the right to make up all work missed during suspension or exclusion.

Medical Alerts

Your students may have serious medical problems which require emergency treatment or classroom adjustment. See the school nurse for additional information and/or assistance regarding students who may have various concerns, including:

- food allergies – may need immediate intervention
- insect sting allergy – immediate medical treatment needed when stung
- epilepsy – may have a seizure or temporary lapse of consciousness
- diabetes – may exhibit symptoms of weakness, fainting, perspiration and/or abnormal to bizarre behavior
- asthma – wheezing, difficulty breathing
- selective seating required – hearing deficiency or vision deficiency
- limited physical activity.

Work with the school nurse to ensure compliance with ISAAC's Administration of Student Medication Policy.

Non-Discrimination

The ISAAC Board of Directors (the "Board") and ISAAC School (ISAAC or the "School") will not make employment decisions (including decisions related to hiring, assignment, compensation, promotion, demotion, disciplinary action and termination) on the basis of race, color, religion, age, sex, marital status, sexual orientation, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, gender identity or expression, status as a victim of domestic violence, or any other basis prohibited by state or federal law ("Protected Class"), except in the case of a bona fide occupational qualification.

It is the policy of the Board that any form of discrimination or harassment on the basis of an individual's actual or perceived membership in a Protected Class, whether by students, Board employees, Board members or third parties subject to the control of the Board, is prohibited. The Board's prohibition of discrimination or harassment in its educational programs or activities expressly extends to academic, nonacademic and extracurricular activities, including athletics.

For more information, as well as the procedures for reporting complaints of discrimination, please see ISAAC's Administrative Regulations Regarding Discrimination Complaints (Personnel), which are included

in the Required Notices section of this Handbook for your reference. If you have questions or concerns about the Board's policies regarding discrimination, you may contact:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

PowerSchool – Online Homework Database

To facilitate communication between the school and home, ISAAC teachers will utilize PowerSchool. Teachers must post all homework and classwork assignments, their point value, and a description of the assignment for parents and students to access 24 hours/day through their PowerSchool accounts. All homework must be posted in advance on Power School.

Power School Reports

PowerSchool is a fully integrated, web-based student information system. All teachers have web access to **PowerTeacher** to take attendance, enter and maintain grades, initiate student and parent communication, post assignments, and access student information. **It is expected that PowerTeacher will be updated once every two weeks at a minimum**.

Professional Dress

It is important for professional educators to dress in a professional manner every school day. Research supports the effect that teacher dress has on student achievement and perception. Faculty must dress professionally during the school day unless the nature of their course dictates them to wear other appropriate attire (e.g. no jeans unless attending field trips or other outdoor activities or otherwise permitted by the Executive Director). Inappropriate attire may include but is not limited to: torn clothing or clothing with holes, jeans, hats/winter hats, winter coats, t-shirts with inappropriate language, flip flops, sweatpants and yoga pants. On professional development days, Field Day, and outdoor field trips, casual attire (e.g. jeans, shorts, sweatshirts, t-shirts) is appropriate.

Professional Learning Communities (PLCs)

PLCs at ISAAC are grouped based on department and/or themes. ISAAC offers a unique schedule that allows members of PLCs to have a common prep period once a week, when possible. It is the school's expectation that PLCs utilize this time to plan and review topics including Stanford Calibration, Learning Walks, Assessment Data, and Curriculum Revision.

Planning and Placement Teams

The Planning and Placement Team (PPT) consists of a permanent committee and extra members as the individual student case under discussion warrants. At present, the permanent membership is made up of a school administrator, who serves as chairman of the PPT, and the individual student's school social worker. Other members of the team as the situation requires are the student's sending district or their representative, social worker, nurse, classroom teachers, and the student's parent(s) or advocate(s). The PPT has the obligation to identify and provide programs for children with exceptionalities, such as learning disabilities, physical handicapping conditions, or social and emotional disturbances.

Any teacher who feels that a student in any class exhibits any type of disability should contact a member of the SRBI Team for help in making the proper written referral to the chairperson of the SRBI Team.

Teachers are responsible for preparing data and attending PPTs when requested to do so. If there are any questions regarding the PPT process, please see the student's case manager.

Security Camera Policy

The ISAAC Board of Directors supports the use of video cameras on school property for the purpose of enhancing school safety and security. The goals are to promote and foster a safe and secure teaching and learning environment for students and staff, to ensure public safety for community members who visit or use school property and diminish the potential for personal and district loss or destruction of property. Appropriate signage is posted at the school entrance to notify students, staff, and the public of the use of security cameras.

Security cameras are installed in public areas only. These cameras are located throughout the building. Restrooms, changing rooms, private offices, and nurse's offices are excluded from security camera use. Security camera use is prohibited in any space where there is a reasonable expectation of privacy. No sound is monitored or recorded in connection with the video surveillance system. All video recordings are stored in a secure place to avoid tampering and to ensure confidentiality in accordance with applicable laws and regulations. Recordings will be saved for a period of time consistent with state law and ISAAC record retention policies, after which all recordings will be appropriately deleted.

Section 504 and Title II of the Americans with Disabilities Act

Section 504 of the Rehabilitation Act of 1973 ("Section 504") prohibits discrimination against individuals with a disability in any program receiving Federal financial assistance. Similarly, Title II of the Americans with Disabilities Act of 1990 ("Title II" or "ADA") prohibits discrimination against individuals with a disability by state and local governments. To be protected under Section 504 and the ADA ("collectively, "Section 504/ADA"), an individual must (1) have a physical or mental impairment that substantially limits one or more major life activities; (2) have a record of such an impairment; or (3) be regarded as having such an impairment.

In order to fulfill its obligation under Section 504/ADA, the ISAAC Board of Directors (the "Board") recognizes a responsibility to avoid discrimination in policies and practices regarding its personnel, students, parents/guardians and members of the public who participate in school sponsored programs. In this regard, the Board prohibits discrimination against any person with a disability in any of the services, programs or activities of the school system.

Employees who are interested in requesting or discussing reasonable accommodations for a disability should contact:

Amy Geary- Director of Special Education
190 Governor Winthrop Boulevard
New London, CT 06320
ageary@isaacschool.org
860.447.1003

Sex Discrimination and Sexual Harassment

It is the policy of the ISAAC Board of Directors that any form of sex discrimination and/or sexual harassment is forbidden in the workplace and in all school facilities, whether by supervisory or non-supervisory personnel, by individuals under contract or volunteers subject to the control of the Board.

Sexual harassment in the workplace, whether by supervisory or non-supervisory employees, will result in disciplinary action up to and including dismissal.

For more information about sex discrimination and sexual harassment, as well as the procedures for reporting complaints, please see ISAAC's Administrative Regulations Regarding Sex Discrimination and Sexual Harassment in the Workplace, which are included in the Required Notices section of this Handbook for your reference. If you have questions or concerns about the Board's policies regarding discrimination on the basis of gender/sex, you may contact ISAAC's Title IX Coordinator:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

Social Media Policy

Staff are directed to consult ISAAC's Social Media Policy and Administrative Regulations as well as ISAAC's Policy on Use of School Computer Systems and Electronic Communications. Of note, all teachers and staff must only communicate with students and parents with an ISAAC created account (i.e. email @isaacschool.org). **Teachers are not to 'friend' or 'follow' any students on social media.**

Substance Abuse Policy

A full statement of the ISAAC's Alcohol, Tobacco and Drug-Free Workplace Policy as it pertains to substance abuse and employee assistance can be found in the Required Notices section of this handbook and on our website: **www.isaacschool.org.**

Surveys and Petitions

Students have the right to exercise the practice of free speech by appropriately distributing petitions at ISAAC. **In order to ensure a safe culture and climate, the following guidelines must be met before any petition is distributed at ISAAC even if the topic is course-related:**

The students, teacher, or organization will meet with ISAAC administration to discuss the literature and methods of distribution at least one day before distribution. In this meeting, administration will ensure that the material meets the following content guidelines:

- does not contain anything obscene or libelous,
- does not advocate breaking laws or school rules,
- will not cause a substantial disruption to the school environment,
- will be distributed before and after school hours and during lunch blocks.

This policy also pertains to any leaflets of any kind that may be distributed.

Tardy Policy

"Tardy" is defined as being late to school, class or activity without permission of school personnel. Students who arrive at school after 8:30 a.m. must report to the main office. Teachers should not allow students admittance to class after 8:30 without a tardy pass from the office unless otherwise notified. Students that are chronically late to school will have their parent/guardian contacted by administration.

Telephones

Each classroom has a telephone. An additional telephone for staff use is located in the conference room. The office telephones are business phones and should be used for emergencies only.

Telephone Numbers for ISAAC

ISAAC Principal	860-447-1003
ISAAC Assistant Principal	860-447-1003
ISAAC Executive Director	860-447-1003
ISAAC Director of Special Education	860-447-1003

Monthly Calendars

Isaac staff are expected to keep monthly calendars electronically for each class taught. **Monthly calendars must be submitted to the administrative team electronically by the first of every month.**

REQUIRED NOTICES

Notification Concerning Asbestos Management Plans

The Asbestos Hazard Emergency Response Act (40CFR 763.93) requires notice be given that ISAAC has asbestos containing materials in the building. A Management Plan has been developed and we will continue to monitor these materials.

The Management Plan is available and accessible to the public at the ISAAC main office.

If you have any questions, you may contact Tino Rodriguez, Director of Facilities, at 860-447-1003, or via email at crodriguez@isaacschool.org.

Notification of Pesticide Applications

The State of Connecticut (Public Act 99-165) requires all schools in the State to implement a plan of action for pest control. ISAAC has adopted an Integrated Pest Management Program (IPM) for pest control within our building. Our main focus will be to control pest problems at their early stage without having to use pesticide.

Pesticide will not be applied on regular basis however, if a pesticide application is needed to eliminate a large amount of pest infestation, we will notify you no later than twenty-four hours prior to any application being made. All records will be kept in ISAAC's Facilities Office.

Notification will include:

- The name of the active ingredient of the pesticide being applied
- The target pest
- The location of the application on the school property
- The date of the application
- The name of the contractor applying the active ingredient

If you have any questions you may contact Tino Rodriguez, Director of Facilities, at 860-447-1003, or via email at crodriguez@isaacschool.org.

Notification of Green Cleaning

HEALTHIER "GREEN" CLEANING PROGRAM IN SCHOOLS (CT PUBLIC ACT 09-81)

The State of Connecticut is requiring that each local and regional board of education implement a green cleaning program for all school buildings and facilities in its district.

The Interdistrict School for Arts and Communication (ISAAC) is committed to the implementation of this law by providing the staff and, upon request, the parents and guardians of each child enrolled in our school with a written statement of the school's Healthier "Green" Cleaning Program as well as making it available on our web site annually. The policy will also be distributed to new staff hired during the school year and to parents or guardians of students transferring in during the school year.

1. A Green Cleaning Program means the procurement and proper use of environmentally preferable cleaning products as defined by the Department of Administrative Services (DAS) for all state-owned buildings, schools and facilities. DAS currently requires that environmentally preferable cleaning products be independently certified by one of two third party certified organizations: Green Seal or Eco Logo.
2. By July 1, 2011 and thereafter no person shall use a cleaning product in a public school unless it meets the DAS standard.
3. The types of cleaning products covered in this legislation include general-purpose bathroom and glass cleaners, floor strippers and finishes, hand cleaners and soaps. The preferred Green Cleaning products used by our school are listed on attachment "A" and can be accessed on ISAAC's website or at ISAAC's main office.
4. Disinfectants, disinfectant cleaners, sanitizers or antimicrobial products regulated by the federal insecticide, fungicide and rodenticide act are not covered by this law.

The following statement will be part of this school's Green Cleaning Program as stated in the new law: "NO PARENT, GUARDIAN, TEACHER OR STAFF MEMBER MAY BRING INTO THE SCHOOL FACILITY ANY CONSUMER PRODUCT WHICH IS INTENDED TO CLEAN, DEODORIZE, SANITIZE OR DISINFECT."

The implementation of this program requires the support and cooperation of everyone including administrators, faculty, staff, parents, guardians and facilities staff.

If you have any questions you may contact Tino Rodriguez, Director of Facilities, at 860-447-1003, or via email at crodriguez@isaacschool.org.

ALCOHOL, TOBACCO AND DRUG-FREE WORKPLACE

PURPOSE

ISAAC's Board of Directors (the "Board") seeks to promote a safe, healthy working environment for all employees and to reduce absenteeism, tardiness and other job performance problems which may be caused by alcohol and/or drug abuse. This policy is adopted in accordance with state law and the Drug Free Workplace Act.

STATEMENT OF POLICY

Employees shall not be involved with the unlawful manufacture, distribution, possession, or use of an illegal drug, a controlled substance, or alcohol and shall not be under the influence of such substances while on school property or while conducting Board business on or off school property. Any employee who discovers illegal drugs or alcohol on school property shall notify the Executive Director or his/her designee who shall investigate the matter.

An employee must report any conviction under a criminal drug statute for violations occurring on or off school property while on Board business to the Executive Director or his/her designee within five (5) days after the conviction. The Board will notify any agency awarding a grant to the Board of such conviction, within ten (10) days thereafter.

Employees shall only use prescription drugs on school property or during the conduct of Board business which have been prescribed by a licensed medical practitioner, and such drugs shall be used only as prescribed. However, in accordance with Conn. Gen. Stat. § 21a-408a through 408q, the Board specifically prohibits the palliative use of marijuana on school property, at a school-sponsored activity, or during the conduct of Board business, and specifically prohibits employees from being under the influence of intoxicating substances, including marijuana used for palliative purposes, during work hours.

The Board prohibits smoking, including smoking using an electronic nicotine delivery system (e.g. e-cigarettes) or vapor product, and the use of tobacco products on school property, including property owned, leased, contracted for, or utilized by the Board, or at any school-sponsored activity. For purposes of this policy, the term "electronic nicotine delivery system" shall mean an electronic device used in the delivery of nicotine or other substances to a person inhaling from the device, and includes, but is not limited to, an electronic cigarette, electronic cigar, electronic cigarillo, electronic pipe or electronic hookah and any related device and any cartridge or other component of such device, including, but not limited to, electronic cigarette liquid. The term "vapor product" shall mean any product that employs a heating element, power source, electronic circuit or other electronic, chemical or mechanical means, regardless of shape or size, to produce a vapor that may or may not include nicotine, and is inhaled by the user of such product. **Violations of this policy may result in disciplinary action, up to and including possible termination of employment.**

DEFINITIONS

“School property” means any land and all temporary and permanent structures comprising the district’s elementary and secondary schools, and administrative office building and includes, but is not limited to, classrooms, hallways, storage facilities, theatres, gymnasiums, fields, and parking lots.

“School-sponsored activity” means any activity sponsored, recognized or authorized by a board of education and includes activities conducted on or off school property.

EMPLOYEE ASSISTANCE

In appropriate circumstances, the Board shall provide an employee with an opportunity for rehabilitation in overcoming addiction to, dependence upon or other problem with alcohol or drugs.

An employee who feels he or she has developed an addiction to, dependence upon or other problem with alcohol or drugs, is encouraged to seek assistance. Certain benefits for alcoholism or drug addiction are provided under the Board's group medical insurance plan. An employee may be given an opportunity to participate in a rehabilitation program which requires absence from work for bona fide treatment. Such absence may be charged to the employee's accrued and unused sick leave, subject to the provisions of the employee's collective bargaining agreement and/or any applicable Board policies and regulations.

Any request for assistance with a drug or alcohol problem will be treated as confidential and only those persons "needing to know" will be made aware of such request.

Legal References:

Connecticut General Statutes:

Conn. Gen. Stat. § 10-233a(h) (definition of school-sponsored activity)
Conn. Gen. Stat. § 19a-342
Conn. Gen. Stat. § 19a-342a
Conn. Gen. Stat. § 21a-408a through 408q (palliative use of marijuana)

United States Code:

Pro-Children Act of 2001, 20 U.S.C. § 7973, as amended by the Every Student Succeeds Act, Public Law 114-95, § 4001
Drug Free Workplace Act, 41 U.S.C. § 8101 et seq.

NOTICE REGARDING ELECTRONIC MONITORING

In accordance with the provisions of Connecticut General Statutes Section 31-48d, ISAAC hereby gives notice to all its employees of the potential use of electronic monitoring in its workplace. While ISAAC may not actually engage in the use of electronic monitoring, it reserves the right to do so as the Board of Directors and/or the Administration deem appropriate in their discretion, consistent with the provisions set forth in this Notice.

"Electronic monitoring," as defined by Connecticut General Statutes Section 31-48d, means the collection of information on the ISAAC's premises concerning employees' activities or communications, by any means other than direct observation of the employees. Electronic monitoring includes the use of a computer, telephone, wire, radio, camera, electromagnetic, photoelectronic or photo-optical systems. The law does not cover the collection of information (A) for security purposes in any common areas of the Board's premises that are open to the public, or (B) which is prohibited under other state or federal law.

The following specific types of electronic monitoring may be used by the ISAAC in its workplaces:

- Monitoring of e-mail and other components of the school's computer systems, including monitoring of electronic devices such as PDAs, Smartphones, and mobile or handheld devices that access the computer systems, for compliance with ISAAC's policies and regulations concerning use of such systems.

- Video and/or audio surveillance within school buildings (other than in restrooms, locker rooms, lounges and other areas designed for the health or personal comfort of employees or for the safeguarding of their possessions), on school grounds and on school buses and other vehicles providing transportation to students and/or employees of the school system.

- Monitoring of employee usage of the school's telephone systems.

The law also provides that, where electronic monitoring may produce evidence of misconduct, ISAAC may use electronic monitoring without any prior notice when ISAAC has reasonable grounds to believe employees are engaged in conduct that: (i) violates the law, (ii) violates the legal rights of ISAAC or other employees, or (iii) creates a hostile work environment.

Questions about electronic monitoring in the workplace should be directed to the Executive Director and/or his/her designee.

Legal References:
Connecticut General Statutes:
Conn. Gen. Stat. § 31-48b
Conn. Gen. Stat. § 31-48d

ADMINISTRATIVE REGULATIONS REGARDING DISCRIMINATION COMPLAINTS (PERSONNEL)

It is the policy of the Interdistrict School for Arts and Communication (the "School") that any form of discrimination or harassment on the basis of protected characteristics such as race, color, religion, age, sex, sexual orientation, marital status, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, or gender identity or expression is forbidden, whether by students, School employees or third parties subject to the control of the School. Students, School employees and third parties are expected to adhere to a standard of conduct that is respectful of the rights of all members of the school community.

It is the express policy of the school to provide for the prompt and equitable resolution of complaints alleging any discrimination on the basis of protected characteristics such as race, color, religion, age, sex, sexual orientation, marital status, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, or gender identity or expression.

If a complaint involves allegations of discrimination or harassment based on reasons such as gender/sex, disability, or pregnancy, such complaints will be handled, as appropriate, in accordance with other Board policies (e.g., Policy #4218, Sex Discrimination/Harassment in the Workplace (Personnel) and Policy # 4504, Section 504/ADA (Personnel)).

Preferably, complaints should be filed within thirty (30) calendar days of the alleged occurrence. Timely reporting of complaints facilitates the investigation and resolution of such complaints. The district will investigate such complaints promptly and equitably, and will take corrective action when allegations are verified.

The district will not tolerate any reprisals or retaliation that occur as a result of the good faith reporting of charges of harassment or discrimination on the basis of race, color, religion, age, sex, sexual orientation, marital status, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, or gender identity or expression. Any such reprisals or retaliation will result in disciplinary action against the retaliator, and other corrective actions as appropriate.

The school district will periodically provide staff development for district administrators and periodically distribute this policy and implementing administrative regulations to staff and students in an effort to maintain an environment free of harassment and discrimination.

As soon as an individual feels that he or she has been subjected to discrimination or harassment on the basis of race, color, religion, age, sex, sexual orientation, marital status, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, or gender identity or expression he/she should make a written complaint to the Executive Director, or his/her designee. The individual and any respondent (if applicable) will be provided a copy of the School's policy and regulation and made aware of his/her rights. In the event the Executive Director or designee receives a complaint alleging discrimination or harassment based on gender/sex or disability, the Executive Director or designee shall follow the procedures identified in the appropriate Board policies ((e.g., Policy # 4208, Sex Discrimination/Harassment in the Workplace (Personnel); Policy #4504, Section 504/ADA (Personnel), where applicable, rather than the complaint procedures provided in this policy.

The complaint should state the:

A. Name of the complainant,

B. Date of the complaint,

C. Date(s) of the alleged harassment/discrimination,

D. Name(s) of the harasser(s) or discriminator(s),

E. Location where such harassment/discrimination occurred,

F. Names of any witness(es) to the harassment/discrimination,

G. Detailed statement of the circumstances constituting the alleged harassment/discrimination; and

H. Proposed remedy.

Any individual who makes an oral complaint of harassment or discrimination will be provided a copy of this regulation and will be requested to make a written complaint pursuant to the above procedure. If an individual is unable to make a written complaint, the staff member receiving the oral complaint will either reduce the complaint to writing or assist the individual with completing the written complaint form.

All complaints received by staff members are to be forwarded immediately to the Executive Director or his/her designee. Upon receipt of a complaint alleging harassment or discrimination under this complaint procedure, the Executive Director or his/her designee shall promptly investigate the complaint. During the course of the investigation, the investigator shall interview or consult with all individuals reasonably believed to have relevant information, including the complainant, the alleged harasser/discriminator ("respondent"), and any witnesses to the conduct. Complaints will be investigated promptly within the timeframes identified below. Timeframes may be extended as needed given the complexity of the investigation, availability of individuals with relevant information and other extenuating circumstances. Confidentiality will be maintained by all persons involved in the investigation to the extent possible, as determined by the investigator.

Upon receipt of a written complaint of discrimination, the investigator should:

1. Offer to meet with the complainant and respondent (if applicable) within ten (10) business days (provided that such timeframe may be reasonably extended based on the availability of necessary witnesses and/or participants during periods of time when school is not in session) to discuss the nature of the complaint, identify individuals the complainant believes has relevant information, and obtain any relevant documents the complainant may have;

2. Provide the complainant and respondent (if applicable) with a copy of the School's non-discrimination policy and accompanying regulations;

3. Investigate the factual basis of the complaint, including, as applicable, conducting interviews with individuals deemed relevant to the complaint;

4. Conduct an investigation that is adequate, reliable, and impartial. Investigate the factual basis for the complaint, including conducting interviews with individuals with information and review of documents relevant to the complaint;

5. Maintain confidentiality to the extent practicable throughout the investigative process, in accordance with state and federal law;

6. Communicate the outcome of the investigation in writing to the complainant and respondent (if any) (to the extent permitted by state and federal confidentiality requirements), within thirty (30) business days (provided that such timeframe may be extended by fifteen (15) business days during periods of time when school is in session or reasonably extended based on the availability of necessary witnesses and/or participants during periods of time when school is not in session) from the date the complaint was received by the Executive Director's office. The complainant and respondent (if any) shall be notified of such extension. The written notice shall include a finding whether the complaint was substantiated and if so, shall identify, to the extent possible, how the district will remedy the discrimination or harassment, adhering to the requirements of state and federal law;

7. If a complaint is made during summer recess, the complaint will be reviewed and addressed as quickly as possible given the availability of staff and/or other individuals who may have information relevant to the complaint. If fixed timeframes cannot be met, the complainant and respondent (if any) will receive notice and interim measures may be implemented as necessary (see subparagraph 6);

8. Whenever allegations are verified, ensure that appropriate corrective action is taken (including, but not limited to, disciplinary action) aimed at preventing the recurrence of the harassment or discrimination. Corrective action should include steps to avoid continuing discrimination;

9. If either party to the complaint is not satisfied with the findings and conclusions of the investigation, the complainant may present the complaint and written outcome to the Executive Director within thirty (30) calendar days of receiving the findings. Upon review of a written request from the party requesting an appeal, the Executive Director shall review the investigative results of the investigator and determine if further action and/or investigation is warranted. Such action may include consultation with a designated investigator (if applicable), complainant, and respondent (if any) and meeting with appropriate individuals to attempt to resolve the complaint, or a decision affirming or overruling a designated investigator's conclusions or findings (if applicable). The Executive Director shall provide written notice to the complainant and respondent (if any) of the proposed actions within fifteen (15) business days (provided that such timeframe may be reasonably extended based on the availability of necessary witnesses and/or participants during periods of time when school is not in session) following the receipt of the written request for review.

If a complaint involves allegations of discrimination or harassment based on reasons such as gender/sex, disability, or pregnancy, such complaints will be handled under other appropriate policies (e.g., Policy #4218, Sex Discrimination/Harassment in the Workplace; Policy #4504, Section 504/ADA).

Any employee also may file a complaint with the Office for Civil Rights, U.S. Department of Education ("OCR"):

Office for Civil Rights, Boston Office
U.S. Department of Education 8th Floor
5 Post Office Square
Boston, MA 02109- 3921

(617-289-0111)
http://www2.ed.gov/about/offices/list/ocr/docs/howto.html

Employees may also file a complaint regarding employment discrimination with the Equal Employment Opportunity Commission:

Equal Employment Opportunity Commission, Boston Area Office
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
(800-669-4000)

Employees may also file a complaint with the Connecticut Commission on Human Rights and Opportunities:

Connecticut Commission on Human Rights and Opportunities
450 Columbus Blvd.
Hartford, CT 06103-1835
(800-477-5737)

Anyone who has questions or concerns about these regulations may contact:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

Anyone who has questions or concerns about the School's policies regarding discrimination on the basis of gender/sex may contact the School's Title IX Coordinator:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

Anyone who has questions or concerns about the School's policies regarding discrimination on the basis of disability may contact the School's Section 504/ADA Coordinator:

Amy Geary, Director of Special Education
190 Governor Winthrop Blvd
New London, CT 06320
ageary@isaacschool.org
860.437.1003

ADMINISTRATIVE REGULATIONS REGARDING EMPLOYEES AND SECTION 504 OF THE REHABILITATION ACT OF 1973 AND TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

POLICY REGARDING EMPLOYEES AND
SECTION 504 OF THE REHABILITATION ACT OF 1973 AND
TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

Section 504 of the Rehabilitation Act of 1973 ("Section 504") prohibits discrimination against individuals with a disability in any program receiving Federal financial assistance. Similarly, Title II of the Americans with Disabilities Act of 1990 ("Title II" or "ADA") prohibits discrimination against individuals with a disability by state and local governments. To be protected under Section 504 and the ADA ("collectively, "Section 504/ADA"), an individual must (1) have a physical or mental impairment that substantially limits one or more major life activities; (2) have a record of such an impairment; or (3) be regarded as having such an impairment.

In order to fulfill its obligation under Section 504/ADA, the ISAAC Board of Directors (the "Board") recognizes a responsibility to avoid discrimination in policies and practices regarding its personnel, students, parents/guardians and members of the public who participate in school sponsored programs. In this regard, the Board prohibits discrimination against any person with a disability in any of the services, programs or activities of the school system.

Employees who are interested in requesting or discussing reasonable accommodations for a disability should contact:

Amy Geary, Director or Special Education
190 Governor Winthrop Boulevard
New London, CT 06320
ageary@isaacschool.org
860.447.1003

Any employee may file an internal grievance/complaint regarding discrimination on the basis of disability by or within ISAAC by utilizing the grievance/complaint procedures outlined in the Board's Administrative Regulations Regarding Employees and Section 504 of Rehabilitation Act of 1973 and Title II of Americans with Disabilities Act, and/or may file a complaint with the Office for Civil Rights, U.S. Department of Education ("OCR"):

Office for Civil Rights, Boston Office
U.S. Department of Education
8th Floor
5 Post Office Square
Boston, MA 02109- 3921
(617) 289-0111

Employees may also file a complaint regarding employment discrimination on the basis of disability with the Equal Employment Opportunity Commission, Boston Area Office, John F. Kennedy Federal Building, 15 New Sudbury Street, Room 475, Boston, MA 02203-0506 (TELEPHONE NUMBER 800-669-4000).

Employees may also file a complaint with the Connecticut Commission on Human Rights and Opportunities, 450 Columbus Blvd., Hartford, CT 06103-1835 (TELEPHONE NUMBER 800-477-5737).

Anyone who wishes to file a grievance/complaint with ISAAC, or who has questions or concerns about this policy, should contact the Section 504/ADA Coordinator for ISAAC:

Amy Geary, Director of Special Education
190 Governor Winthrop Boulevard
New London, CT 06320
ageary@isaacschool.org
860.447.1003

Legal References:

29 U.S.C. §§ 705, 794
34 C.F.R. Part 104
42 U.S.C. § 12101 et seq.
28 C.F.R. Part 35

ADMINISTRATIVE REGULATIONS REGARDING EMPLOYEES
AND SECTION 504 OF THE REHABILITATION ACT OF 1973
AND TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

ISAAC Board of Directors Section 504/ADA Grievance/Complaint
Procedures Regarding Discrimination Against Employees

Section 504 of the Rehabilitation Act of 1973 ("Section 504") and Title II of the Americans with Disabilities Act of 1990 ("Title II" or "ADA") (collectively, "Section 504/ADA") prohibit discrimination on the basis of disability. For the purposes of Section 504/ADA, the term "disability" with respect to an individual means: (a) a physical or mental impairment that substantially limits one or more major life activities of such individual; (b) a record of such an impairment; or (c) being regarded as having such an impairment.

I. Definitions

Major life activities: include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. A major life activity also includes the operation of a major bodily function, such as the functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive systems. The operation of a major bodily function includes the operation of an individual organ within a body system.

Mitigating measures: include, but are not limited to, (a) medication, medical supplies, equipment, appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics including limbs and devices,

hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, oxygen therapy equipment and supplies; (b) use of assistive technology; (c) reasonable modifications or auxiliary aids or services; (d) learned behavioral or adaptive neurological modifications; or (e) psychotherapy, behavioral therapy, or physical therapy.

Physical or mental impairment: (a) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems, such as: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine;(b) any mental or psychological disorder, such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disability; or (c) an impairment that is episodic or in remission if it would substantially limit a major life activity when active. Physical or mental impairment includes, but is not limited to, contagious and noncontagious diseases and conditions such as the following: orthopedic, visual, speech, and hearing impairments, and cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, intellectual disability, emotional illness, dyslexia and other specific learning disabilities, Attention Deficit Hyperactivity Disorder, Human Immunodeficiency Virus infection (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

II. Procedures for Grievances/Complaints Alleging Discrimination on the Basis of Disability

Any eligible person, including any student, parent/guardian, staff member or other employee who feels that he/she has been discriminated against on the basis of disability (including differential treatment, harassment and retaliation) may submit a written complaint to ISAAC's designated Section 504/ADA Coordinator (see contact information below) within thirty (30) school days of the alleged occurrence.

Timely reporting of complaints facilitates the prompt investigation and resolution of such complaints. If a complaint is filed relating to alleged discrimination occurring more than thirty (30) school days after the alleged occurrence, the ability of the ISAAC School (the "School") to investigate the allegations may be limited by the passage of time. Therefore, complaints received after thirty (30) school days of the alleged occurrence shall be investigated to the extent possible, given the passage of time and the impact on available information, witnesses and memory. If a complaint is made verbally, the individual taking the complaint will reduce the complaint to writing. Individuals wishing to make a complaint about discrimination against students on the basis of disability should be referred to ISAAC's Section 504/ADA policies and regulations regarding students.

Retaliation against any individual who complains pursuant to the Board's policy and regulations listed herein is strictly prohibited. ISAAC will not tolerate any retaliation that occurs as a result of the good faith reporting or complaint of disability-based discrimination or as a result of an individual's participation or cooperating in the investigation of a complaint. ISAAC will take necessary actions to prevent retaliation as a result of filing a complaint or the participation in an investigation of a complaint.

If the Section 504/ADA Coordinator is the subject of the complaint, the complaint should be submitted directly to the Executive Director who may conduct the investigation or appoint a designee to conduct the investigation in accordance with these procedures. If the Executive Director is the subject of the complaint, ISAAC shall designate an appropriate party to conduct the investigation in accordance with these procedures.

Complaints will be investigated promptly within timeframes identified below. Timeframes may be extended as needed given the complexity of the investigation, availability of individuals with relevant information and other extenuating circumstances. Confidentiality will be maintained by all persons involved in the investigation to the extent possible.

F. The complaint should contain the following information:

The name of the complainant;
The date of the complaint;
The date(s) of the alleged discrimination;
The names of any witnesses or individuals relevant to the complaint;
A detailed statement describing the circumstances in which the alleged discrimination occurred; and
The remedy requested.

However, all complaints will be investigated to the extent possible, even if such information is not included in the complaint. In such circumstances, additional information may be requested by the investigator as part of the investigation process.

G. Upon receipt of the complaint, the individual investigating the complaint shall:

Provide a copy of the written complaint to the Executive Director;

Meet separately with the complainant and the respondent within ten (10) school days to discuss the nature of the complaint, identify individuals the complainant and respondent believe have relevant information, and obtain any relevant documents the complainant may have;

Provide the complainant and respondent with a copy of the applicable Board Section 504/ADA Policy and these administrative regulations;

Consider whether and which interim measures might be appropriate for an alleged victim and the respondent pending the outcome of ISAAC's investigation;

Conduct an investigation of the factual basis of the complaint that is adequate, reliable, and impartial, including conducting interviews with individuals with information and review of documents relevant to the complaint;

Maintain confidentiality to the extent practicable throughout the investigative process in accordance with state and federal law;

Communicate the outcome of the investigation in writing to the complainant, and to the respondent (to the extent permitted by state and federal confidentiality requirements), within fifteen (15) school days from the date the complaint was received by the Section 504/ADA Coordinator or Executive Director. The written notice shall include a finding as to whether the complaint was substantiated and if so, shall identify how ISAAC will remedy any identified violations of Section 504/ADA. The investigator may extend this deadline for no more than fifteen (15) additional school days if needed to complete the investigation. The complainant and the respondent shall be notified of any such extension;

If a complaint is made during summer recess, the complaint will be reviewed and addressed as quickly as possible given the availability of staff and/or other individuals who may have information relevant to the complaint, and no later than fifteen (15) school days after the start of the following school year. The complainant and the respondent will receive notice if the investigation has been impeded by the summer recess, and interim measures may be implemented as necessary (see sub-paragraph 4);

Ensure that appropriate corrective action is taken whenever allegations are verified. When allegations are verified, ensure that measures to remedy the effects of the discrimination and prevent its recurrence are appropriately considered, and offered, when appropriate. Corrective action should include steps to avoid continuing discrimination;

In the event the investigator concludes that there is no violation of Section 504/ADA, ISAAC may attempt to resolve the complainant's ongoing concerns, if possible.

H. If the complainant or respondent is not satisfied with the findings and conclusions of the investigation, the appealing party may request review and reconsideration of the conclusion of the complaint within ten (10) school days of receipt of the written outcome. In requesting review, the appealing party must submit the complaint, the written outcome of the complaint, and explain why he/she believes the factual information relied upon by the investigator was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied, and how this information would change the investigator's determination in the case. Failure to provide all such information may result in the denial of the review.

Upon review of a written request from the appealing party, the Executive Director will provide the appealing party's written statement to the non-appealing party (if any). The non-appealing party will then have ten (10) school days to submit to the decision-maker(s) for the appeal a written statement in support of, or challenging, the outcome of the complaint procedures.

The Executive Director shall review the evidence and the information presented by the parties and determine if further action and/or investigation is warranted. Such action may include consultation with the investigator and other relevant witnesses, a meeting with appropriate individuals to attempt to resolve the complaint or a decision affirming or overruling the investigator's conclusions or findings. The Executive Director shall issue written notice of the outcome of the appeal to the parties within thirty (30) school days of receipt of all written statements from the parties (provided that such timeframe may be reasonably extended based on the availability of necessary witnesses and/or participants, the complexity of the investigation, and/or other extenuating circumstances). The Executive Director's decision shall be final.

Complaint Procedure for Executive Director/Board Members Complaints:

Any School administrator or Board member who receives a complaint of discrimination, harassment or retaliation of any employee by a Board Member or by the Executive Director shall forward the complaint promptly as follows. Complaints pertaining to the Executive Director or Board members will be forwarded to the Chair of the Board of Directors. Complaints pertaining to the Board Chair will be forwarded to the Board Vice Chair. In all cases, the individual receiving the complaint shall take appropriate steps to cause the matter to be investigated in a manner consistent with the procedures described above.

If a complainant or a respondent is not satisfied with the findings and conclusions of an investigation in which the Executive Director or a member of the Board is the respondent, within ten (10) school days of receiving the findings such party may present the complaint and written outcome to the Board Chair (or, if initially presented by the Board Chair, the Board Vice Chair), who will take appropriate steps to cause the matter to be reviewed in a manner consistent with the Board's non-discrimination policy and regulation. Such steps may include retention of an independent investigator different from the investigator who investigated the complaint.

III. The Section 504/ADA Coordinator for ISAAC is:

Amy Geary, Director of Special Education
190 Governor Winthrop Boulevard
New London, CT 06320
ageary@isaacschool.org
860.447.1003

IV. Complaints to Federal or State Agencies

At any time, the complainant has the right to file a formal complaint with the U.S. Department of Education, Office for Civil Rights, 8th Floor, 5 Post Office Square, Suite 900, Boston, MA 02109-0111 (TELEPHONE NUMBER (617) 289-0111); http://www2.ed.gov/about/offices/list/ocr/docs/howto.html. Employees may also file a complaint regarding employment discrimination on the basis of disability with the
Equal Employment Opportunity Commission, Boston Area Office, John F. Kennedy Federal Building, 15 New Sudbury Street, Room 475, Boston, MA 02203-0506 (TELEPHONE NUMBER 800-669-4000), or the Connecticut Commission on Human Rights and Opportunities, 450 Columbus Blvd., Hartford, CT 06103-1835 (TELEPHONE NUMBER 800-477-5737).

NOTICE OF THE TITLE IX COORDINATOR

The School's Title IX Coordinator is **Mercedes Alger, Principal**. Any individual may make a report of sex discrimination and/or sexual harassment directly to the Title IX Coordinator using any one, or multiple, of the following points of contact:

190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

The Title IX Coordinator manages the School's compliance with Title IX, Title VII and Connecticut law with respect to sexual harassment and/or sex discrimination and is an available resource to anyone seeking information or wishing to file a formal complaint of same. When a student, School employee, or other participant in the School's programs and activities feels that such person has been subjected to discrimination on the basis of sex in any School program or activity, including without limitation being subjected to sexual harassment, such person may contact the Title IX Coordinator or utilize the Title IX, Title VII and Connecticut law grievance systems set forth herein to bring concerns forward for the purpose of obtaining a prompt and equitable resolution.

EXPLANATION OF COMPLAINT PROCESS AND PROCEDURE

The federal regulations implementing Title IX require the adoption and publication of two separate grievance systems: a grievance process for complaints of sex discrimination involving allegations of sexual harassment and grievance procedures for complaints of sex discrimination that are not sexual harassment. Accordingly, the Administration will process any complaints of sex discrimination involving allegations of sexual harassment, as defined above, pursuant to the **grievance process** set forth in Section I of these regulations. The Administration will process any complaints of sex discrimination that are not sexual harassment pursuant to the **grievance procedures** set forth in Section II of these regulations.

The School will keep confidential the identity of any individual who has a made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act (FERPA), or as required by law, or to carry out the purposes of these Administrative Regulations, including the conduct of any investigation, hearing, or judicial proceeding arising from these Administrative Regulations.

The obligation to comply with Title IX is not obviated or alleviated by the FERPA.

SECTION I: GRIEVANCE PROCESS FOR COMPLAINTS OF SEXUAL HARASSMENT

A. Definitions

- **Bias** occurs when it is proven that the Title IX Coordinator, investigator(s), and/or decision-maker(s) demonstrate actual bias, rather than the appearance of bias. Actual bias includes, but is not limited to, demonstrated personal animus against the respondent or the complainant and/or prejudgment of the facts at issue in the investigation.

- **Complainant** means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.

- A **conflict of interest** occurs when it is proven that the Title IX Coordinator, investigator(s), and/or decision-maker(s) have personal, financial and/or familial interests that affected the outcome of the investigation.

- For purposes of investigations and complaints of sexual harassment, **education program or activity** includes locations, events, or circumstances over which the School exercises substantial control over both the respondent and the context in which the sexual harassment occurs.

- **Employee** means (A) a teacher, substitute teacher, school administrator, school superintendent, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by the Board or working in a public elementary, middle or high school; or (B) any other individual who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in a public elementary, middle or high school, pursuant to a contract with the Board.

- **Formal complaint** means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the Administration investigate the allegation of sexual harassment. A "document filed by a complainant" means a document or electronic submission that contains the complainant's physical or digital signature, or otherwise indicates that the complainant is the person filing the formal complaint.

- **Respondent** means an individual who has been alleged to be the perpetrator of conduct that could constitute sexual harassment.

- **Supportive measures** means non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the School's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the School's educational environment, or deter sexual harassment. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, mutual restrictions on contact between the parties, increased security and monitoring, and other similar measures.

B. Reporting Sexual Harassment

1. It is the express policy of the Board to encourage victims of sexual harassment to report such claims. Any person may report sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed for the Title IX Coordinator. If the School receives notice of sexual harassment or alleged sexual harassment against a person in the School's education program or activity, the Title IX Coordinator or designee will promptly contact the complainant to discuss the availability of supportive measures, whether or not the complainant has filed a formal complaint, and will consider the complainant's wishes with respect to such measures. If the complainant has yet to file a formal complaint, the Title IX Coordinator or designee will explain to the complainant the process for doing so.

2. The School will treat complainants and respondents equitably. A respondent is presumed not responsible for the alleged conduct and a determination regarding responsibility will be made at the conclusion of the grievance process if a formal complaint is filed. Nothing in these Administrative Regulations shall preclude the School from placing an employee respondent on administrative leave during the pendency of the grievance process. Further, nothing in these Administrative Regulations shall limit or preclude the School from removing a respondent from the School's education program or activity on an emergency basis, provided that the School undertakes an individualized safety and risk analysis, and determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal. If a respondent is removed on an emergency basis, the School shall provide the respondent with notice and an opportunity to challenge the decision immediately following the removal.

C. Formal Complaint and Grievance Process

1. A formal complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail, by using the contact information listed for the Title IX Coordinator. At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the School's education programs or activity. A formal complaint may be signed by the Title IX Coordinator. If the complaint being filed is against the Title IX Coordinator, the formal complaint should be filed with the Executive Director. If the formal complaint being filed is against the Executive Director, the formal complaint should be filed with the Board Chair, who will then retain an independent investigator to investigate the matter.

2. The School may consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances. If possible, formal complaints should be filed within ten (10) school days of the alleged occurrence in order to facilitate the prompt and equitable resolution of such claims. The School will attempt to complete the formal grievance process within ninety (90) school days of receiving a complaint. This timeframe may be temporarily delayed or extended in accordance with Subsection G of this Section.

3. Upon receipt of a formal complaint, if the Title IX Coordinator or designee has not already discussed the availability of supportive measures with the complainant, the Title IX Coordinator or designee will promptly contact the complainant to discuss the availability of such measures and consider the complainant's wishes with respect to them. The Title IX Coordinator or designee may also contact the respondent, separately from the complainant, to discuss the availability of supportive measures for the respondent. The School will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the School to provide supportive measures.

4. Within ten (10) school days of receiving a formal complaint, the School will provide the known parties with written notice of the allegations potentially constituting sexual harassment and a copy of this grievance process. The written notice must also include the following:

    i. The identities of the parties involved in the incident, if known;

    ii. The conduct allegedly constituting sexual harassment as defined above;

    iii. The date and the location of the alleged incident, if known;

    iv. A statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process;

    v. A statement that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence; and

vi. A statement of any provision in the School's policies that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

If, in the course of an investigation, the School decides to investigate allegations about the complainant or respondent that are not included in the written notice, the School must provide notice of the additional allegations to the parties whose identities are known.

5. The parties may have an advisor of their choice accompany them during any grievance proceeding at which the party's attendance is required. The School may, in its discretion, establish certain restrictions regarding the extent to which an advisor may participate in the proceedings. If any such restrictions are established, they will be applied equally to all parties.

6. The Title IX Coordinator will, as applicable, promptly commence an investigation of the formal complaint, designate a school administrator to promptly investigate the formal complaint, or dismiss the formal complaint in accordance with Subsection F of this Section. The standard of evidence to be used to determine responsibility is the preponderance of the evidence standard (i.e., more likely than not). The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on the School and not on the parties.

7. The parties will be given an equal opportunity to discuss the allegations under investigation with the investigator(s) and are permitted to gather and present relevant evidence. This opportunity includes presenting witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a complainant, respondent, or witness. The School will provide to a party whose participation is invited or expected (including a witness) written notice of the date, time, location, participants, and purpose of all hearings (if applicable), investigative interviews, or other meetings, with sufficient time for the party to prepare to participate.

8. Both parties will be given an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint, including the evidence upon which the School does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to the conclusion of the investigation. Prior to completion of the investigative report, the School will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have ten (10) school days to submit a written response, which the investigator(s) will consider prior to completion of the investigative report, as described in Paragraph 9 of this section.

9. The investigator(s) will create an investigative report that fairly summarizes relevant evidence. The investigator(s) will send the investigative report, in an electronic format or hard copy, to each party and to each party's advisor for their review and written response at least ten (10) school days prior to the time a determination regarding responsibility is made.

10. The Executive Director will appoint a decision-maker(s), who shall be a School employee or third-party contractor and who shall be someone other than the Title IX Coordinator or investigator(s). If the complaint filed is against the Executive Director, the Board Chair shall appoint the decision-maker, who shall be someone other than the Title IX Coordinator or investigator(s). The investigator(s) and the decision-maker(s) shall not discuss the investigation's facts and/or determination while the complaint is pending. The decision-maker(s) will afford each party the opportunity to submit written, relevant questions that a party wants asked of any party or witness, provide each party with the answers, and allow for additional, limited follow-up questions from each party. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. The decision-maker(s) will explain to the party proposing the questions any decisions to exclude a question as not relevant.

11. The decision-maker(s) will issue a written determination regarding responsibility. The written determination will include: (1) identification of the allegations potentially constituting sexual harassment; (2) a description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held; (3) findings of fact supporting the determination; (4) conclusions regarding the application of the School's code of conduct to the facts; (5) a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the School will impose on the respondent, and whether remedies designed to restore or preserve equal access to the School's education program or activity will be provided by the School to the complainant; and (6) the School's procedures and permissible bases for the complainant and respondent to appeal. If the respondent is found responsible for violating the Board's Policy regarding the Prohibition of Sex Discrimination and Sexual Harassment (Personnel), the written determination shall indicate whether the respondent engaged in sexual harassment as defined by the Board's Policy and these Administrative Regulations. The written determination will be provided to both parties simultaneously.

12. Student respondents found responsible for violating the Board's Policy regarding the Prohibition of Sex Discrimination and Sexual Harassment (Personnel) may be subject to discipline up to and including expulsion. Employee respondents found responsible for violating the Board's Policy regarding the Prohibition of Sex Discrimination and Sexual Harassment (Personnel) may be subject to discipline up to and including termination of employment. Other respondents may be subject to exclusion from the School's programs, activities and/or property. In appropriate circumstances, the School may make a criminal referral. Remedies will be designed to restore or preserve equal access to the School's education programs or activities.

13. After receiving notification of the decision-maker(s)' decision, or after receiving notification that the School dismissed a formal complaint or any allegation therein, both complainant and respondent may avail themselves of the appeal process set forth in Section E of this Regulation.

D. Informal Resolution

At any time prior to reaching a determination regarding responsibility, but only after the filing of a formal complaint, the School may suggest to the parties the possibility of facilitating an informal resolution process, such as mediation, to resolve the formal complaint without the need for a full investigation and adjudication. If it is determined that an informal resolution may be appropriate, the Title IX Coordinator or designee will consult with the parties.

Prior to facilitating an informal resolution to a formal complaint, the Title IX Coordinator or designee will provide the parties with written notice disclosing the sexual harassment allegations, the requirements of an informal resolution process, and any consequences from participating in the informal resolution process. Upon receipt of this document, complainants and respondents have five (5) school days to determine whether they consent to participation in the informal resolution. The School must obtain voluntary, written consent to the informal resolution process from both parties.

Prior to agreeing to any resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. If a satisfactory resolution is reached through this informal process, the matter will be considered resolved. If these efforts are unsuccessful, the formal grievance process will continue.

Nothing in this section precludes an employee from filing a complaint of retaliation for matters related to an informal resolution, nor does it preclude either party from filing complaints based on conduct that is alleged to occur following the School's facilitation of the informal resolution.

An informal resolution is not permitted to resolve allegations that an employee sexually harassed a student.

E. Appeal Process

After receiving notification of the decision-maker(s)' decision, or after receiving notification that the School dismissed a formal complaint or any allegation therein, both complainant and respondent have five (5) school days to submit a formal letter of appeal to the Title IX Coordinator specifying the grounds upon which the appeal is based.

Appeals will be appropriate only in the following circumstances:

- new evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
- procedural irregularity that affected the outcome of the matter;
- the Title IX Coordinator, investigator(s), and/or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter. A conflict of interest or bias does not exist solely because the Title IX Coordinator, investigators(s), and/or decision-maker(s) previously worked with or disciplined the complainant or respondent.

The School will provide the other party with written notice of such appeal. Both parties will then have an opportunity to submit a written statement in support of, or challenging, the outcome. Such written

statement must be submitted ten (10) school days after receiving written notice of the appeal. Upon receipt of an appeal, the Executive Director shall appoint a decision-maker(s) for the appeal, who shall be someone other than the Title IX Coordinator, investigator(s), or initial decision-maker(s). The decision-maker(s) for the appeal, in their discretion, will determine the appropriate procedure for the appeal. After considering the parties' written statements, the decision-maker(s) for the appeal will provide a written decision. If it is found that one of the bases for appeal exists, the decision-maker(s) for the appeal will issue an appropriate remedy.

Supportive measures for either or both parties may be continued throughout the appeal process.

F. Dismissal of a Formal Complaint

The Title IX Coordinator shall dismiss any formal complaint that, under Title IX, 1) would not constitute sexual harassment as defined under Title IX even if proved, 2) did not occur in the School's education program or activity, or 3) did not occur against a person in the United States. Such dismissal does not preclude action under another Board policy.

The School may dismiss a formal complaint or any allegations therein, if at any time during the investigation or hearing a complainant notifies the Title IX Coordinator in writing that 1) the complainant would like to withdraw the formal complaint or any allegations therein; 2) the respondent is no longer enrolled or employed in the School; or 3) specific circumstances prevent the School from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

Upon a dismissal, the School will promptly and simultaneously send written notice of the dismissal and reason(s) therefor to each party. Either party can appeal from the School's dismissal of a formal complaint or any allegations therein using the appeals procedure.

In the event a formal complaint is dismissed prior to the issuance of a decision under Title IX, the Title IX Coordinator shall determine if the allegations of sexual harassment shall proceed through the grievance procedures identified in Section II of these Administrative Regulations for claims of sex discrimination for consideration as to whether the allegations constitute sexual harassment under Title VII or Connecticut law.

A dismissal pursuant to this section does not preclude action by the School under the Student Discipline policy, Code of Conduct for students/or and employees, or any other applicable rule, policy, and/or collective bargaining agreement.

G. Miscellaneous

1. Any time frame set forth in these Administrative Regulations may be temporarily delayed or extended for good cause. Good cause may include, but is not limited to, considerations such as the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; concurrent activity by the Department of Children and Families; or the need for language assistance or accommodation of disabilities. If any timeframe is altered on a showing of good cause, written notice will be provided to each party with the reasons for the action.

2. If a sexual harassment complaint raises a concern about discrimination or harassment on the basis of any other legally protected classification (such as race, religion, color, national origin,

age, or disability), the Title IX Coordinator or designee shall make a referral to other appropriate personnel (e.g. Section 504 Coordinator, etc.), so as to ensure that any such investigation complies with the requirements of policies regarding nondiscrimination.

3. If the sexual harassment complaint results in reasonable cause to suspect or believe that a child has been abused or neglected, has had a nonaccidental physical injury, or injury which is at variance with the history given of such injury, is placed at imminent risk of serious harm, or that a student has been sexually assaulted by a school employee, then, the person to whom the complaint is given or who receives such information shall report such matters in accordance with the Board's policy on the Reports of Suspected Child Abuse or Neglect of Children.

4. Retaliation against any individual who complains pursuant to the Board's Policy regarding the Prohibition of Sex Discrimination and Sexual Harassment (Personnel) and these Administrative Regulations is strictly prohibited. The School will take actions designed to prevent retaliation as a result of filing a complaint. Complaints alleging retaliation may be filed according to the grievance procedures for sex discrimination described herein.

5. The School will maintain for a period of seven (7) years records of:
    i. Each sexual harassment investigation including any determination regarding responsibility, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to the Board's education program or activity;
    ii. Any appeal and the result therefrom;
    iii. Any informal resolution and the result therefrom; and
    iv. All material used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process. The Board will make these training materials publicly available on its website.

   If the School has actual knowledge of sexual harassment in an education program or activity of the Board, and for any report or formal complaint of sexual harassment, the School will create and maintain for a period of seven (7) years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment. The School will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to the Board's education program or activity. If the School does not provide a complainant with supportive measures, then the School will document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

PROHIBITION OF SEX DISCRIMINATION, INCLUDING SEX-BASED HARASSMENT

The ISAAC Board of Directors (the "Board") and ISAAC do not discriminate on the basis of sex and prohibit sex discrimination in any education program or activity that the Board and/or School operate, as required by Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, et seq. and its implementing regulations ("Title IX"), as it may be amended from time to time, Title VII of the Civil Rights Act of 1964 ("Title VII"), and Connecticut law.

Inquiries about Title IX may be referred to ISAAC's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both. ISAAC's Title IX Coordinator is:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

The Executive Director shall develop and adopt grievance procedures that provide for the prompt and equitable resolution of complaints made (1) by students, employees, or other individuals who are participating or attempting to participate in the ISAAC's education program or activity, or (2) by the Title IX Coordinator, alleging any action that would be prohibited by Title IX, Title VII, or Connecticut law (the "Administrative Regulations").

Sex discrimination occurs when a person, because of the person's sex, is denied participation in or the benefits of any education program or activity receiving federal financial assistance. This includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex discrimination includes sex-based harassment, as defined below.

Sex-based harassment is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity, that is:

1. Quid pro quo harassment, or where an employee, agent or other person authorized by the Board to provide an aid, benefit or services under its education program or activity explicitly or impliedly conditions the provision of an aid, benefit, or service of the Board on an individual's participation in unwelcome sexual conduct;

2. Hostile environment harassment, or unwelcome sex-based conduct that based on the totality of the circumstances, is (1) subjectively and objectively offensive and (2) so severe or pervasive that it limits or denies a person's ability to participate in or benefit from ISAAC's education program or activity. Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

   a. the degree to which the conduct affected the complainant's ability to access ISAAC's education program or activity;
   b. the type, frequency, and duration of the conduct;
   c. the parties' ages, roles within ISAAC's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
   d. the location of the conduct and the context in which the conduct occurred; and
   e. other sex-based harassment in ISAAC's education program or activity; or

3. A specific offense, as follows:

   a. Sexual assault, meaning an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation;

b. Dating violence, meaning violence committed by a person: (i) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (ii) where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship;

c. Domestic violence, meaning felony or misdemeanor crimes committed by a person who: (i) is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of Connecticut, or a person similarly situated to a spouse of the victim; (ii) is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner; (iii) shares a child in common with the victim; or (iv) commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of Connecticut; or

d. Stalking, meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (i) fear for the person's safety or the safety of others; or (ii) suffer substantial emotional distress.

Reporting Sex Discrimination:

The following people have a right to make a complaint of sex discrimination, including a complaint of sex-based harassment, requesting that ISAAC investigate and make a determination about alleged discrimination under Title IX:

1. A "complainant," which includes:

a. a student of ISAAC or employee of the Board who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX; or

b. a person other than a student of ISAAC or employee of the Board who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX at a time when that individual was participating or attempting to participate in the Board's education program or activity;

2. A parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant; and

3. ISAAC's Title IX Coordinator.

For clarity, a person is entitled to make a complaint of sex-based harassment only if they themselves are alleged to have been subjected to the sex-based harassment, if they have a legal right to act on behalf of such person, or if the Title IX Coordinator initiates a complaint consistent with the requirements of Title IX.

With respect to complaints of sex discrimination other than sex-based harassment, in addition to the people listed above, the following persons have a right to make a complaint:

- Any student of ISIAAC or employee of the Board; or
- Any person other than a student of ISAAC or employee of the Board who was participating or attempting to participate in the Board's education program or activity at the time of the alleged sex discrimination.

To report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX, please contact ISAAC's Title IX Coordinator or an administrator.
Any Board employee who has information about conduct that reasonably may constitute sex discrimination must as immediately as practicable notify the Title IX Coordinator. If the Title IX Coordinator is alleged to have engaged in sex discrimination, Board employees shall instead notify their building principal or the Executive Director, if the employee is not assigned to a school building.
Individuals may also make a report of sex discrimination to the U.S. Department of Education: Office for Civil Rights, Boston Office, U.S. Department of Education, 9th Floor, 5 Post Office Square, Boston, MA 02109-3921 (Telephone (617) 289-0111) and/or to the Connecticut Commission on Human Rights and Opportunities, 450 Columbus Boulevard, Hartford, CT 06103-1835 (Telephone: 860-541-3400 or Connecticut Toll Free Number: 1-800-477-5737).

SECTION II. GRIEVANCE PROCEDURES FOR CLAIMS OF SEX DISCRIMINATION (OTHER THAN SEXUAL HARASSMENT UNDER TITLE IX)

A. Definitions

- **Complainant** means an individual who is alleged to be the victim of conduct that could constitute sex discrimination.

- **Respondent** means an individual who has been reported to be the perpetrator of conduct that could constitute sex discrimination.

B. Reporting Sex Discrimination Other than Sexual Harassment under Title IX

It is the express policy of the Board to encourage victims of sex discrimination to report such claims. Any person may report sex discrimination (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination), in person, by mail, by telephone, or by electronic mail, using the contact information listed for the Title IX Coordinator. If the School receives notice of sex discrimination or alleged sex discrimination against a person in the School's education program or activity, the Title IX Coordinator or designee will promptly notify the complainant of the grievance process. The School will treat complainants and respondents equitably during the grievance process. Sexual harassment is a form of sex discrimination, and any incident of sexual harassment under Title IX, as defined above, shall be handled pursuant to Section I of these Administrative Regulations. Any allegations of sexual harassment under Title VII or Connecticut law, as defined above, shall be handled pursuant to this Section II of these Administrative Regulations.

C. Grievance Procedures

1. As soon as an employee feels that he or she has been subjected to sex discrimination other than sexual harassment as defined under Title IX (including, without limitation, sexual harassment under Title VII or Connecticut law), he/she should make a written complaint to the Title IX Coordinator or to the building principal, or his/her designee. The employee will be provided a copy of the Board's policy and Administrative Regulations and made aware of his or her rights. Preferably, complaints should be filed within ten (10) school days of the alleged occurrence. Timely reporting of complaints facilitates the investigation and resolution of such complaints.

2. The complaint should state the:

    i. Name of the complainant;
    ii. Date of the complaint;
    iii. Date(s) of the alleged discrimination;
    iv. Name(s) of the discriminator(s);
    v. Location where such discrimination occurred;
    vi. Names of any witness(es) to the discrimination;
    vii. Detailed statement of the circumstances constituting the alleged discrimination; and
    viii. Remedy requested.

3. Any employee who makes an oral complaint of sex discrimination to any of the above-mentioned personnel will be provided a copy of these Administrative Regulations and will be requested to make a written complaint pursuant to the above procedure.

4. All complaints are to be forwarded immediately to the building principal or designee unless that individual is the subject of the complaint, in which case the complaint should be forwarded directly to the Executive Director or his/her designee. In addition, a copy of any complaint filed under this Policy shall be forwarded to the Title IX Coordinator. If the complaint being filed is against the Title IX Coordinator, the complaint should be filed with the Executive Director. If the complaint being filed is against the Executive Director, the complaint should be filed with the Board Chair, who will then retain an independent investigator to investigate the matter.

5. The Title IX Coordinator or designee shall investigate all complaints of sex discrimination against an employee, regardless of whether the conduct occurred on or off-school grounds. Complaints will be investigated promptly within the timeframes identified below. Timeframes may be extended as needed given the complexity of the investigation, availability of individuals with relevant information, and other extenuating circumstances. The investigation shall be conducted discreetly, maintaining confidentiality insofar as possible while still conducting an effective and thorough investigation.

6. Any employee who makes a complaint shall be notified of the School's intent to investigate the complaint. In the event the employee requests confidentiality or that an investigation not be conducted, the School will take reasonable steps to investigate and respond to the complaint to the extent possible, given the request for confidentiality or that the School not investigate the complaint. If the employee insists that his/her information not be shared with the alleged discriminator(s), the employee will be informed that the School's ability to investigate and/or take corrective action may be limited

7. Upon receipt of a sex discrimination complaint, the Title IX Coordinator shall either promptly commence an investigation of the complaint, or shall designate a school administrator to promptly investigate the complaint. The Title IX Coordinator or designee shall:
    i. offer to meet with the complainant and respondent (if applicable) separately within ten (10) school days to discuss the nature of the complaint, identify individuals the complainant and respondent (if applicable) believe have relevant information, and obtain any relevant documents the complainant and respondent may have;

    ii. provide the complainant and respondent (if applicable) with a copy of the Board's sex discrimination policy and accompanying regulations;

    iii. consider whether any interim measures may be appropriate to protect the complainant or respondent (if applicable), pending the outcome of the investigation;

    iv. conduct an investigation that is adequate, reliable, and impartial. Investigate the factual basis of the complaint, including, as applicable, conducting interviews with individuals deemed relevant to the complaint;

v. consider whether alleged sex discrimination has created a hostile work environment, including consideration of the effects of off-campus conduct on the school;

vi. communicate the outcome of the investigation in writing to the complainant, to the respondent, and to any individual properly identified as a party to the complaint (to the extent permitted by state and federal confidentiality requirements), within ninety (90) school days from the date the complaint was received by the Executive Director's office. The investigator may extend this deadline for no more than fifteen (15) additional school days if needed to complete the investigation. The complainant and respondent (if applicable) shall be notified of such extension. The written notice shall include a finding whether the complaint was substantiated and if so, shall identify, to the extent possible, how the School will remedy the discrimination, adhering to the requirements of state and federal law; and

vii. when sex discrimination has been found, take steps that are reasonably calculated to end the discrimination, take corrective and/or disciplinary action aimed at preventing the recurrence of the discrimination, as deemed appropriate by the Executive Director or his/her designee, and take steps to remedy the effects of the sex discrimination.

8. If a complaint is made during summer recess, the complaint will be reviewed and addressed as quickly as possible given the availability of staff and/or other individuals who may have information relevant to the complaint. If fixed timeframes cannot be met, the complainant and respondent will receive notice and interim measures may be implemented as necessary.

9. If the complainant or respondent (if applicable) is dissatisfied with the findings of the investigation, he or she may file a written appeal within five (5) school days to the Title IX Coordinator, or, if he/she conducted the investigation, to the Executive Director, who shall review the Title IX Coordinator or designee's written report, the information collected by the Title IX Coordinator or designee together with the recommended disposition of the complaint to determine whether the alleged conduct constitutes sex discrimination. The Title IX Coordinator or Executive Director may determine if further action and/or investigation is warranted. After completing this review, the Title IX Coordinator or Executive Director shall respond to the complainant and respondent (if applicable), in writing, within fifteen (15) school days following the receipt of the written request for review.

D. <u>Miscellaneous</u>

1. If a sex discrimination complaint raises a concern about discrimination or harassment on the basis of any other legally protected classification (such as race, religion, color, national origin, age, or disability), the Title IX Coordinator or designee shall make a referral to other appropriate personnel within the School (e.g. Section 504 Coordinator, etc.), so as to ensure that any such investigation complies with the requirements of policies regarding nondiscrimination.

2. If the sex discrimination complaint results in reasonable cause to suspect or believe that a child has been abused or neglected, has had a nonaccidental physical injury, or injury which is at variance with the history given of such injury, is placed at imminent risk of serious harm, or that a student has been sexually assaulted by a school employee, then, the person to whom the complaint is given or who receives such information shall report such matters in accordance with the Board's policy on the Reports of Suspected Child Abuse or Neglect of Children.

3. Retaliation against any individual who complains pursuant to the Board's Policy regarding the Prohibition of Sex Discrimination and Sexual Harassment (Personnel) and these Administrative Regulations is strictly prohibited. The School will take actions designed to prevent retaliation as a result of filing a complaint. Complaints alleging retaliation may be filed according to the grievance procedures for sex discrimination described herein.

Section III. Further Reporting

At any time, a complainant alleging sex discrimination or sexual harassment may also file a formal complaint with the Office for Civil Rights, Boston Office, U.S. Department of Education, 8th Floor, 5 Post Office Square, Boston, MA 02109-3921 (Telephone (617) 289-0111).

Employees may also make a report of sexual harassment and/or sex discrimination to the Connecticut Commission on Human Rights and Opportunities, 450 Columbus Boulevard, Hartford, CT 06103-1835 (Telephone: 860-514-3400).

Copies of these Administrative Regulations will be distributed to all employees.

ISAAC GENERAL CONCERNS PROCESS FOR PERSONNEL

The Interdistrict School for Arts and Communication ("ISAAC") encourages faculty and staff to share concerns, as well as suggestions for improvement, with ISAAC leadership. The below process is meant to foster an open channel for communication so that issues can be addressed promptly and, in a manner, focused on continuous improvement and supporting a positive school climate.

The General Concerns Process for Personnel is available to faculty and staff who wish to address issues (such as employee relations matters and conflict resolution) that fall outside the realm of ISAAC's non-discrimination policies and procedures and grievance procedures. If faculty and/or staff would like to file a complaint alleging potential discrimination, they should follow the policies and procedures made available to them in the relevant Board policy and regulations concerning Non-Discrimination; Prohibition of Sex Discrimination, Including Sex-Based Harassment; and/or Section 504/Title II of the Americans with Disabilities Act. In addition, teachers who believe that there has been a violation, misinterpretation, or misapplication of a specific term of the relevant collective bargaining agreement ("CBA") should follow the grievance procedure outlined in the teachers' CBA.

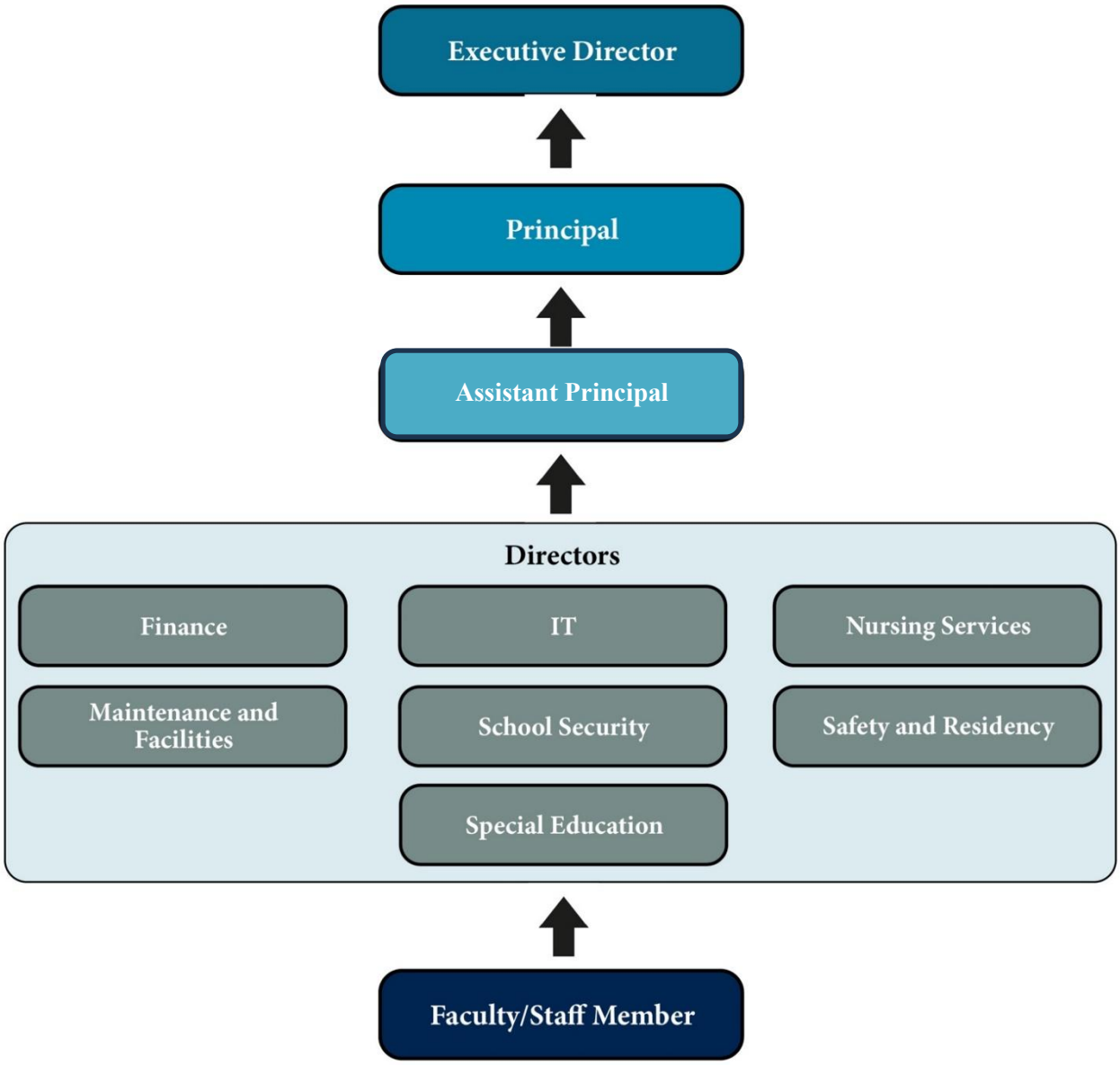
For all other issues, faculty and staff are encouraged to make their first contact with the appropriate member of the leadership team, depending on the topic of concern. Thus, a faculty or staff member may raise their concerns with any of the following individuals, as relevant and appropriate: Director of Finance, Director of Information Technology ("IT"), Director of Nursing Services, Director of Maintenance and Facilities, Director of School Security, Director of Safety and Residency, or Director of Special Education. The employee may submit a concern in writing and/or request to meet with the relevant member of the leadership team, who will work to resolve the issue promptly.

If the situation remains unresolved, the faculty or staff member may raise the issue with Mercedes Alger, Principal; and/or Dr. Nicholas Spera, Executive Director, in that order. The employee may submit a concern in writing and/or request to meet with the relevant administrator, who will work to resolve the issue promptly.

If, at any time, the faculty or staff member feels uncomfortable raising a concern with their direct supervisor or another administrator identified in the general line of progression, the employee may bring the issue to the attention of another administrator and/or use an alternate pathway for raising workplace issues, such as raising the issue through the Principal Advisory Committee.

General Concerns Process for Personnel – Flow Chart

While the general line of progression is outlined below, a faculty or staff member may "skip" any step in the process if their concern lies with an individual in a particular position.



If, at any time, it becomes evident that the concern raised through this process should be handled pursuant to another ISAAC Board policy or procedure, the reviewing administrator will provide the relevant Board policy and/or procedure to the employee and take any other steps as may be appropriate.

NON-DISCRIMINATION

Protected Class Discrimination Prohibited:

The ISAAC Board of Directors (the "Board") and ISAAC School (ISAAC or the "School") will not make employment decisions (including decisions related to hiring, assignment, compensation, promotion, demotion, disciplinary action and termination) on the basis of race, color, religion, age, sex, marital status, sexual orientation, national origin, alienage, ancestry, disability, pregnancy, genetic information, veteran status, gender identity or expression, status as a victim of domestic violence, or any other basis prohibited by state or federal law ("Protected Class"), except in the case of a bona fide occupational qualification.

It is the policy of the Board that any form of discrimination or harassment on the basis of an individual's actual or perceived membership in a Protected Class, whether by students, Board employees, Board members or third parties subject to the control of the Board, is prohibited in the School. The Board's prohibition of discrimination or harassment in its educational programs or activities expressly extends to academic, nonacademic and extracurricular activities, including athletics.

Discrimination on the Basis of Erased Criminal History Prohibited:

The Board will not discriminate against any employee or applicant for employment solely on the basis of the individual's erased criminal history record information, as defined in Conn. Gen. Stat. § 46a-80a.

Retaliation Prohibited:

The Board prohibits reprisal or retaliation against any individual who reports incidents in good faith that may be a violation of this policy, or who participates in the investigation of such reports.

Discrimination on the Basis of Protected Class Association Prohibited:

Discrimination and/or harassment against any individual on the basis of that individual's association with someone in a Protected Class may also be considered a form of Protected Class discrimination and/or harassment and is therefore prohibited by this policy.

Scope and Applicability:

Students, Board employees, Board members and community members (e.g., other individuals affiliated with the school, accessing or seeking access to School facilities) are expected to adhere to a standard of conduct that is respectful of the rights of all members of the school community.

Definitions:
The following definitions apply for purposes of this policy:

A. Discrimination

It is illegal for employers to treat employees differently in relation to hiring, discharging, compensating, or providing the terms, conditions, and privileges of employment because of such employee's actual or perceived membership in a Protected Class.

B. Harassment

Harassment is a form of Protected Class discrimination that is prohibited by law and by this policy. Harassment is unwelcome conduct that is based on an employee's actual or perceived membership in a Protected Class. Harassment constitutes unlawful discrimination when 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

The following non-exhaustive list provides examples of the types of prohibited conduct that may be considered Protected Class harassment that can lead to an intimidating, hostile, or abusive environment, and are therefore prohibited by this policy:

• objectively offensive racial, ethnic, or religious epithets (or epithets commonly associated with any Protected Class membership);
• other words or phrases commonly considered demeaning or degrading on the basis of Protected Class membership;
• display of images or symbols commonly associated with discrimination against individuals on the basis of their membership in a Protected Class;
• graphics, written or electronic communications that are harmful or humiliating based on Protected Class membership;
• bigoted conduct or communications; or
• physical, written, electronic or verbal threats based on Protected Class membership.

Harassment does not have to involve intent to harm, be directed toward a specific person, or involve repeated incidents.

Sexual harassment is a form of harassment that is prohibited by law and Board Policy 4218, Prohibition of Sex Discrimination, Including Sex-Based Harassment (Personnel) . For more information regarding harassment based on sex, sexual orientation, pregnancy, or gender identity or expression, contact the School's Title IX Coordinator at:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

C. Genetic information

The information about genes, gene products, or inherited characteristics that may derive from an individual or a family member. “Genetic information” may also include an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact that an individual or an individual’s family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

D. Veteran

A veteran is any person honorably discharged from, released under honorable conditions from or released with an other than honorable discharge based on a qualifying condition from active service in the United States Army, Navy, Marine Corps, Coast Guard and Air Force and any reserve component thereof, including the Connecticut National Guard. “Qualifying condition” means (i) a diagnosis of post-traumatic stress disorder or traumatic brain injury made by an individual licensed to provide health care services at a United States Department of Veterans Affairs facility, (ii) an experience of military sexual trauma disclosed to an individual licensed to provide health care services at a United States Department of Veterans Affairs facility, or (iii) a determination that sexual orientation, gender identity, or gender expression was more likely than not the primary reason for an other than honorable discharge, as determined in accordance with Conn. Gen. Stat. §§ 27-103(c), (d).

E. Gender identity or expression

Gender identity or expression refers to a person's gender-related identity, appearance or behavior, whether or not that gender-related identity, appearance or behavior is different from that traditionally associated with the person's physiology or assigned sex at birth, which gender-related identity can be shown by providing evidence including, but not limited to, medical history, care or treatment of the gender-related identity, consistent and uniform assertion of the gender-related identity or any other evidence that the gender-related identity is sincerely held, part of a person's core identity or not being asserted for an improper purpose.

F. Sexual orientation

Sexual orientation refers to a person’s identity in relation to the gender or genders to which they are romantically, emotionally or sexually attracted, inclusive of any identity that a person (i) may have previously expressed, or (ii) is perceived by another person to hold.

G. Race

The term race is inclusive of ethnic traits historically associated with race, including but not limited to, hair texture and protective hairstyles. “Protective hairstyles” includes, but is not limited to, wigs, headwraps and hairstyles such as individual braids, cornrows, locs, twists, Bantu knots, afros and afro puffs.

H. Domestic violence

The term domestic violence means (1) a continuous threat of present physical pain or physical injury against a family or household member, as defined in Conn. Gen. Stat. § 46b-38a; (2) stalking, including but not limited to, stalking as described in Conn. Gen. Stat. § 53a-181d, of such family or household member; (3) a pattern of threatening, including but not limited to, a pattern of threatening as described in Conn. Gen. Stat. § 53a-62, of such family or household member or a third party that intimidates such family or household member; or (4) coercive control of such family or household member, which is a pattern of behavior that in purpose or effect unreasonably interferes with a person's free will and personal liberty. “Coercive control” includes, but is not limited to, unreasonably engaging in any of the following: (a) isolating the family or household member from friends, relatives or other sources of support; (b) depriving the family or household member of basic necessities; (c) controlling, regulating or monitoring the family or household member's movements, communications, daily behavior, finances, economic resources or access to services; (d) compelling the family or household member by force, threat or intimidation, including, but not limited to, threats based on actual or suspected immigration status, to (i) engage in conduct from which such family or household member has a right to abstain, or (ii) abstain from conduct that such family or household member has a right to pursue; (e) committing or threatening to commit cruelty to animals that intimidates the family or household member; or (f) forced sex acts, or threats of a sexual nature, including, but not limited to, threatened acts of sexual conduct, threats based on a person's sexuality or threats to release sexual images.

Reporting to School Officials:

It is the policy of the Board to provide for the prompt and equitable resolution of complaints alleging Protected Class discrimination or harassment. The School will investigate both formal and informal complaints of discrimination, harassment or retaliation.

Any employee who believes they or another employee has experienced Protected Class discrimination or harassment or an act of retaliation or reprisal in violation of this policy should report such concern in writing to Mercedes Alger or any other School administrator in accordance with the Board’s complaint procedures included in the Board’s Administrative Regulations Regarding Non-Discrimination/Personnel, which accompany this policy and are available online at https://z2policy.cabe.org/cabe/browse/isaac/isaac/z20000045 or upon request from the main office of the School.

Employees are encouraged to report incidents of alleged Protected Class discrimination, harassment, or retaliation immediately.

If a complaint involves allegations of discrimination or harassment based on sex, sexual orientation, pregnancy, or gender identity or expression, such complaints will be handled in accordance with the procedures set forth in Board Policy 4218, Prohibition of Sex Discrimination, Including Sex-Based Harassment (Personnel).

If a complaint involves allegations of discrimination or harassment based on disability, such complaints will be addressed in accordance with the procedures set forth in Board Policy 4504, Section 504/ADA (Personnel).

In the event conduct reported as Protected Class discrimination and/or harassment allegedly violates more than one policy, the Board will coordinate any investigation in compliance with the applicable policies.

Mandatory Staff Reporting for Student Incidents:

Board employees are required to report incidents of alleged student-to-student and employee-to-student discrimination, harassment or retaliation that may be based on a Protected Class when Board employees witness such incidents or when Board employees receive reports or information about such incidents, whether such incidents are verbal or physical or amount to discrimination, harassment or retaliation in other forms. Reports should be made to any School administrator or to Mercedes Alger.

Remedial Action:

If the School makes a finding of discrimination, harassment or retaliation, the School will take remedial action designed to:

A. eliminate the discriminatory/harassing/retaliatory conduct,
B. prevent its recurrence, and
C. address its effects on the complainant and any other affected individuals.

Examples of appropriate action may include, but are not limited to:

A. In the case of a student respondent, interventions for the individual who engaged in the discrimination/harassment may include, but are not limited to, discipline (including but not limited to suspension and/or expulsion), educational interventions, exclusion from extra-curricular activities and/or sports programs, and/or referral to appropriate state or local agencies;
B. In the case of an employee respondent, interventions for the individual who engaged in the discrimination/harassment may include, but are not limited to, supervisor notification, discipline (including possible termination of employment), training, and/or referral to appropriate state or local agencies;
C. In the case of respondent who is otherwise associated with the school community, interventions for the individual who engaged in the discrimination/harassment may include, but are not limited to, exclusion from school property and/or activities and/or referral to appropriate state or local agencies;
D. Follow-up inquiries with the complainant and witnesses to ensure that the discriminatory/harassing conduct has stopped and that they have not experienced any retaliation;
E. Supports for the complainant; and

F. Training or other interventions for the larger school community designed to ensure that students, staff, parents, Board members and other individuals within the school community understand the types of behavior that constitute discrimination/harassment, that the School does not tolerate it, and how to report it.

Reporting to State and Federal Agencies:

In addition to reporting to the Board, any employee also may file a complaint with the following agencies:

Office for Civil Rights, U.S. Department of Education ("OCR"):

Office for Civil Rights, Boston Office
U.S. Department of Education
8th Floor
5 Post Office Square
Boston, MA 02109- 3921
(617-289-0111)
http://www2.ed.gov/about/offices/list/ocr/docs/howto.html

Equal Employment Opportunity Commission:
Equal Employment Opportunity Commission, Boston Area Office
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
(800-669-4000)

Connecticut Commission on Human Rights and Opportunities
450 Columbus Blvd.
Hartford, CT 06103-1835
(860-541-3400 or Connecticut Toll Free Number 1-800-477-5737)

Questions/Requests for Accommodation:
Any employee who:
1.has questions or concerns about this policy or its accompanying regulations;
2.wishes to request or discuss accommodations based on religion; OR
3.would like a copy the Board's complaint procedures or complaint forms related to claims of discrimination or harassment should contact the following School official:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

Any employee who has questions or concerns about the Board's policies regarding discrimination on the basis of gender/sex/sexual orientation/pregnancy/gender identity or expression applicable to employees should contact the School's Title IX Coordinator:

Mercedes Alger -Principal
190 Governor Winthrop Blvd.
New London, CT 06320
malger@isaacschool.org
860.447.1003

Any employee who:
1. has specific questions or concerns about the Board's policies regarding discrimination on the basis of disability applicable to employees; OR
2. wishes to request an accommodation on the basis of disability

Should contact the School's Section 504/ADA Coordinator:

Amy Geary
190 Governor Winthrop Boulevard
New London, CT 06320
ageary@isaacschool.org
860.447.1003

SEXUAL HARASSMENT IS ILLEGAL
AND IS PROHIBITED
BY
THE CONNECTICUT DISCRIMINATION EMPLOYMENT PRACTICES ACT
(Section 46a-60(a)(8) of the Connecticut General Statutes)
AND
TITLE VII OF THE CIVIL RIGHTS ACT OF 1964
(42 United States Code Section 2000e et seq.)

SEXUAL HARASSMENT MEANS ANY UNWELCOME SEXUAL ADVANCES OR REQUESTS FOR SEXUAL FAVORS OR ANY CONDUCT OF A SEXUAL NATURE WHEN:

1. SUBMISSION TO SUCH CONDUCT IS MADE EITHER EXPLICITLY OR IMPLICITLY A TERM OR CONDITION OF AN INDIVIDUAL'S EMPLOYMENT;

2. SUBMISSION TO OR REJECTION OF SUCH CONDUCT BY AN INDIVIDUAL IS USED AS THE BASIS FOR EMPLOYMENT DECISIONS AFFECTING SUCH INDIVIDUAL; OR

3. SUCH CONDUCT HAS THE PURPOSE OR EFFECT OF SUBSTANTIALLY INTERFERING WITH AN INDIVIDUAL'S WORK PERFORMANCE OR CREATING AN INTIMIDATING, HOSTILE, OR OFFENSIVE WORKING ENVIRONMENT.

Examples of Sexual Harassment Include:

UNWELCOME SEXUAL ADVANCES
SUGGESTIVE OR LEWD REMARKS
UNWANTED HUGS, TOUCHES, KISSES
REQUESTS FOR SEXUAL FAVORS
RETALIATION FOR COMPLAINING ABOUT SEXUAL HARASSMENT
DEROGATORY OR PORNOGRAPHIC POSTERS, CARTOONS, OR DRAWINGS.

Remedies for sexual harassment may include:

CEASE AND DESIST ORDERS
BACK PAY
COMPENSATORY DAMAGES
PUNITIVE DAMAGES
HIRING, PROMOTION, OR REINSTATEMENT

RETALIATION AGAINST ANY EMPLOYEE FOR COMPLAINING ABOUT SEXUAL HARASSMENT IS PROHIBITED UNDER THIS POLICY AND ILLEGAL.

VIOLATION OF THIS POLICY IS GROUNDS FOR DISCIPLINE, INCLUDING DISCHARGE.

INDIVIDUALS WHO ENGAGE IN ACTS OF SEXUAL HARASSMENT MAY ALSO BE SUBJECT TO CIVIL AND CRIMINAL PENALTIES.

AN INFRACTION OF THIS POLICY BY SUPERVISORS OR CO-WORKERS SHOULD BE REPORTED IMMEDIATELY TO **MERCEDES ALGER, TITLE IX COORDINATOR, OR EXECUTIVE DIRECTOR, DR. NICHOLAS J. SPERA, IF THE TITLE IX COORDINATOR IS THE SUBJECT OF THE COMPLAINT.** CONFIDENTIALITY WILL BE MAINTAINED TO THE EXTENT POSSIBLE.

ANY EMPLOYEE WHO BELIEVES THAT HE OR SHE HAS BEEN HARASSED OR DISCRIMINATED AGAINST IN THE WORKPLACE IN VIOLATION OF THIS POLICY MAY ALSO CONTACT:

THE CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES
EASTERN REGIONAL OFFICE
100 BROADWAY
NORWICH, CT 06360
(860)886-5707

AND/ OR:

THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
BOSTON AREA OFFICE
JOHN F. KENNEDY FEDERAL BUILDING
475 GOVERNMENT CENTER
BOSTON, MA 02203
PHONE (800) 669-4000

CONNECTICUT LAW REQUIRES THAT A FORMAL WRITTEN COMPLAINT BE FILED WITH THE COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES WITHIN THREE HUNDRED (300) DAYS OF THE DATE WHEN THE ALLEGED HARASSMENT/ DISCRIMINATION OCCURRED.

REPORTS OF SUSPECTED ABUSE OR NEGLECT OF CHILDREN OR SEXUAL ASSAULT OF STUDENTS BY SCHOOL EMPLOYEES

Conn. Gen. Stat. Section 17a-101 et seq. requires school employees who have reasonable cause to suspect or believe (1) that any child under eighteen has been abused or neglected, has had a nonaccidental physical injury, or injury which is at variance with the history given of such injury, or has been placed at imminent risk of serious harm, or (2) that any person who is being educated by the Technical Education and Career System or a local or regional board of education or charter school, other than as part of an adult education program, is a victim of sexual assault, and the perpetrator is a school employee, to report such suspicions to the appropriate authority. In furtherance of this statute and its purpose, it is the policy of Interdistrict School for Arts and Communication (the "School") to require ALL EMPLOYEES of the School to report suspected abuse and/or neglect, nonaccidental physical injury, imminent risk of serious harm, or sexual assault of a student by a School employee, in accordance with the procedures set forth below.

1. Scope of Policy

This policy applies not only to school employees who are required by law to report suspected child abuse and/or neglect, nonaccidental physical injury, imminent risk of serious harm, or sexual assault of a student by a school employee, but to ALL EMPLOYEES of the School.

2. Definitions

For the purposes of this policy:

"Abused" means that a child (a) has had physical injury or injuries inflicted upon him or her other than by accidental means, or (b) has injuries which are at variance with the history given of them, or (c) is in a condition which is the result of maltreatment, such as, but not limited to, malnutrition, sexual molestation or exploitation, deprivation of necessities, emotional maltreatment or cruel punishment.

"Neglected" means that a child (a) has been abandoned, or (b) is being denied proper care and attention, physically, educationally, emotionally or morally, or (c) is being permitted to live under conditions, circumstances or associations injurious to his well-being, or (d) has been abused.

"School employee" means (a) a teacher, substitute teacher, school administrator, school Executive Director, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by the School or who is working in a School elementary, middle or high school; or (b) any other person who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in the School, pursuant to a contract with the School.

"Sexual assault" means, for the purposes of the mandatory reporting laws and this policy, a violation of Sections 53a-70, 53a-70a, 53a-71, 53a-72a, 53a-72b or 53a-73a of the Connecticut General Statutes. Please see Appendix A of this policy for the relevant statutory definitions of sexual assault laws and related terms covered by the mandatory reporting laws and this policy.

"Statutorily mandated reporter" means an individual required by Conn. Gen. Stat. Section 17a-101et seq. to report suspected abuse and/or neglect of children or the sexual assault of a student by a school employee. The term "statutorily mandated reporter" includes all school employees, as defined above, any person who is a licensed behavior analyst, and any person who holds or is issued a coaching permit by the State Board of Education, is a coach of intramural or interscholastic athletics and is eighteen years of age or older.

3. What Must Be Reported

a. A report must be made when any employee of the School in the ordinary course of such person's employment or profession has reasonable cause to suspect or believe that any child under the age of eighteen years:

i) has been abused or neglected;

ii) has had nonaccidental physical injury, or injury which is at variance with the history given for such injury, inflicted upon him/her;

iii) is placed at imminent risk of serious harm; or

b. A report must be made when any employee of the School in the ordinary course of such person's employment or profession has reasonable cause to suspect or believe that any person, regardless of age, who is being educated by the School, the Technical Education and Career System or a local or regional board of education, other than as part of an adult education program, is a victim of the following sexual assault crimes, and the perpetrator is a School employee:

i) sexual assault in the first degree;

ii) aggravated sexual assault in the first degree;

iii) sexual assault in the second degree;

iv) sexual assault in the third degree;

v) sexual assault in the third degree with a firearm; or

vi) sexual assault in the fourth degree.

Please see Appendix A of this policy for the relevant statutory definitions of sexual assault laws and related terms covered by the mandatory reporting laws and this policy.

c) The suspicion or belief of a School employee may be based on factors including, but not limited to, observations, allegations, facts or statements by a child or victim, as described above, or a third party. Such suspicion or belief does not require certainty or probable cause.

4. Reporting Procedures for Statutorily Mandated Reporters

The following procedures apply only to statutorily mandated reporters, as defined above.

When an employee of the School who is a statutorily mandated reporter and who, in the ordinary course of the person's employment, has reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or is a victim of sexual assault by a school employee, as described in Paragraph 3, above the following steps shall be taken.

(1) The employee shall make an oral or electronic report as soon as practicable, but not later than twelve (12) hours after having reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or a student is a victim of sexual assault by a school employee.

(a) An oral report shall be made by telephone or in person to the Commissioner of the Department of Children and Families ("DCF") or the local law enforcement agency. DCF has established a 24 hour Child Abuse and Neglect Careline at 1-800-842-2288 for the purpose of making such oral reports.

(b) An electronic report shall be made in the manner prescribed by the Commissioner of DCF. An employee making an electronic report shall respond to further inquiries from the Commissioner of DCF or designee made within twenty-four (24) hours. Such employee shall inform the Executive Director or his/her designee as soon as possible as to the nature of the further communication with the Commissioner or designee.

(2) The employee shall also make an oral report as soon as practicable to the Building Principal or his/her designee, and/or the Executive Director or his/her designee. If the Building Principal is the alleged perpetrator of the abuse/neglect or sexual assault of a student, then the employee shall notify the Executive Director or the Executive Director's designee directly.

(3) In cases involving suspected or believed abuse, neglect or sexual assault of a student by a school employee, the Executive Director or his/her designee shall immediately notify the child's parent or guardian that such a report has been made.

(4) Not later than forty-eight (48) hours after making an oral report, the employee shall submit a written or electronic report to the Commissioner of DCF or the Commissioner's designee containing all of the required information. The written or electronic report should be submitted in the manner prescribed by the Commissioner of DCF. When such report is submitted electronically, the employee shall respond to further inquiries from the Commissioner of DCF or designee made within twenty-four (24) hours. Such employee shall inform the Executive Director or his/her designee as soon as possible as to the nature of the further communication with the Commissioner or designee.

(5) The employee shall immediately submit a copy of the written or electronic report to the Building Principal or his/her designee and to the Executive Director or the Executive Director 's designee.

(6) If the report concerns suspected abuse, neglect, or sexual assault of a student by a school employee holding a certificate, authorization or permit issued by the State Department of Education, the Commissioner of DCF (or his/her designee) shall submit a copy of the written or electronic report to the Commissioner of Education (or his/her designee).

5. Reporting Procedures for Employees Other Than Statutorily Mandated Reporters

The following procedures apply only to employees who are not statutorily mandated reporters, as defined above.

a) When an employee who is not a statutorily mandated reporter and who, in the ordinary course of the person's employment or profession, has reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or a student is a victim of sexual assault by a school employee, as described in Paragraph 3, above the following steps shall be taken.

(1) The employee shall make an oral report as soon as practicable, but not later than twelve (12) hours after the employee has reasonable cause to suspect or believe that a child has been abused or neglected, or placed at imminent risk of serious harm or a student is a victim of sexual assault by a school employee. Such oral report shall be made by telephone or in person to the Executive Director or his/her designee, to be followed by an immediate written report to the Executive Director or his/her designee.

(2) If the Executive Director or his/her designee determines that there is reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm or a student is a victim of sexual assault by a school employee, he/she shall cause reports to be made in accordance with the procedures set forth for statutorily mandated reporters.

b) Nothing in this policy shall be construed to preclude an employee reporting suspected child abuse, neglect or sexual assault by a school employee from reporting the same directly to the Commissioner of DCF.

6. Contents of Reports

Any report made pursuant to this policy shall contain the following information, if known:

a) The names and addresses of the child* and his/her parents or other person responsible for his/her care;

b) the age of the child;

c) the gender of the child;

d) the nature and extent of the child's injury or injuries, maltreatment or neglect;

e) the approximate date and time the injury or injuries, maltreatment or neglect occurred;

f) information concerning any previous injury or injuries to, or maltreatment or neglect of the child or his/her siblings;

g) the circumstances in which the injury or injuries, maltreatment or neglect came to be known to the reporter;

h) the name of the person or persons suspected to be responsible for causing such injury or injuries, maltreatment or neglect;

i) the reasons such person or persons are suspected of causing such injury or injuries, maltreatment or neglect;

j) any information concerning any prior cases in which such person or persons have been suspected of causing an injury, maltreatment or neglect of a child; and

k) whatever action, if any, was taken to treat, provide shelter or otherwise assist the child.

*For purposes of this Paragraph, the term "child" includes any victim of sexual assault by a school employee, as described in Paragraph 2, above

7. Investigation of the Report

a) The Executive Director or his/her designee shall thoroughly investigate reports of suspected abuse, neglect or sexual assault if/when such report involves an employee of the School or other individual under the control of the School, provided the procedures in subparagraph (b), below, are followed. In all other cases, DCF shall be responsible for conducting the investigation with the cooperation and collaboration of the School, as appropriate.

b) Recognizing that DCF is the lead agency for the investigation of child abuse and neglect reports and reports of a student's sexual assault by school employees, the Executive Director's investigation shall permit and give priority to any investigation conducted by the Commissioner of DCF or the appropriate local law enforcement agency. The Executive Director shall conduct the School's investigation and take any disciplinary action, consistent with state law, upon notice from the Commissioner of DCF or the appropriate local law enforcement agency that the School's investigation will not interfere with the investigation of the Commissioner of DCF or the local law enforcement agency.

c) The Executive Director shall coordinate investigatory activities in order to minimize the number of interviews of any child or student victim of sexual assault and share information with other persons authorized to conduct an investigation of child abuse or neglect, as appropriate.

d) Any person reporting child abuse or neglect or the sexual assault of a student by a school employee, or having any information relevant to alleged abuse or neglect or of the sexual assault of a student by a school employee, shall provide the Executive Director with all information related to the investigation that is in the possession or control of such person, except as expressly prohibited by state or federal law.

e) When the School is conducting an investigation involving suspected abuse or neglect or sexual assault of a student by an employee of the School or other individual under the control of the Board of Directors, the Executive Director's investigation shall include an opportunity for the individual suspected of abuse, neglect or sexual assault to be heard with respect to the allegations contained within the report. During the course of such investigation, the Executive Director may suspend a School employee with pay or may place the employee on administrative leave with pay, pending the outcome of the investigation. If the individual is one who provides services to or on behalf of students enrolled in the School, pursuant to a contract with the Board of Directors, the Executive Director may suspend the provision of such services, and direct the individual to refrain from any contact with students enrolled in the School, pending the outcome of the investigation.

8. <u>Evidence of Abuse, Neglect or Sexual Assault by a School Employee</u>

a) If, upon completion of the investigation by the Commissioner of DCF ("Commissioner"), the Executive Director has received a report from the Commissioner that he or she has reasonable cause to believe that (1) a child has been abused or neglected by a school employee, as defined above, and the Commissioner has recommended that such employee be placed on the DCF Child Abuse and Neglect Registry, or (2) a student is a victim of sexual assault by a school employee the Executive Director shall request (and the law provides) that DCF notify the Executive Director not later than five (5) working days after such finding, and provide the Executive Director with records, whether or not created by DCF, concerning such investigation. The Executive Director shall suspend such school employee. Such suspension shall be with pay and shall not result in the diminution or termination of benefits to such employee.

b) Not later than seventy-two (72) hours after such suspension, the Executive Director shall notify the State Board of Education and the Commissioner of Education, or the Commissioner of Education's representative, of the reasons for and the conditions of the suspension. The [Executive Director shall disclose such records to the Commissioner of Education and the Board of Directors or its attorney for purposes of review of employment status or the status of such employee's certificate, permit or authorization, if any.

c) The suspension of a school employee employed in a position requiring a certificate shall remain in effect until the [Executive Director and/or Board of Directors acts pursuant to the provisions of Conn. Gen. Stat. §10-151. If the contract of employment of such certified school employee is terminated, or such certified school employee resigns such employment, the Executive Director shall notify the Commissioner of Education, or the Commissioner of Education's representative, within seventy-two (72) hours after such termination or resignation.

d) The suspension of a school employee employed in a position requiring an authorization or permit shall remain in effect until the Executive Director and/or Board of Directors acts pursuant to any applicable termination provisions. If the contract of employment of a school employee holding an authorization or permit from the State Department of Education is terminated, or such school employee resigns such employment, the [Executive Director shall notify the Commissioner of Education, or the Commissioner of Education's representative, within seventy-two (72) hours after such termination or resignation.

e) Regardless of the outcome of any investigation by the Commissioner of DCF and/or the police, the Executive Director and/or the Board of Directors, as appropriate, may take disciplinary action, up to and including termination of employment, in accordance with the provisions of any applicable statute, if the Executive Director 's investigation produces evidence that a child has been abused or neglected by a school employee or that a student has been a victim of sexual assault by a school employee.

f) The School shall not employ a person whose employment contract is terminated or who resigned from employment following a suspension pursuant to Paragraph 8(a) of this policy and Conn. Gen. Stat. § 17a-101i, if such person is convicted of a crime involving an act of child abuse or neglect or an act of sexual assault of a student, as described in Paragraph 2 of this policy.

9. Evidence of Abuse, Neglect or Sexual Assault by an Independent Contractor of the School

If the investigation by the Executive Director and/or the Commissioner of DCF produces evidence that a child has been abused or neglected, or a student has been sexually assaulted, by any individual who provides services to or on behalf of students enrolled in the School, pursuant to a contract with the School, the Executive Director shall permanently suspend the provision of such services, and direct the individual to refrain from any contact with students enrolled in the School.

10. Delegation of Authority by Executive Director

The Executive Director may appoint a designee for the purposes of receiving and making reports, notifying and receiving notification, or investigating reports pursuant to this policy.

11. Confidential Rapid Response Team

The Executive Director shall establish a confidential rapid response team to coordinate with DCF to (1) ensure prompt reporting of suspected abuse or neglect or sexual assault of a student by a school employee, as described in Paragraph 2, above, and (2) provide immediate access to information and individuals relevant to the department’s investigation. The confidential rapid response team shall consist of a teacher and the Executive Director a local police officer and any other person the School, acting through its Executive Director, deems appropriate.

12. Disciplinary Action for Failure to Follow Policy

Except as provided in Section 14 below, any employee who fails to comply with the requirements of this policy shall be subject to discipline, up to and including termination of employment.

13. The School shall not hire any person whose employment contract was previously terminated by a board of education or other charter school or who resigned from such employment, if such person has been convicted of a violation of Section 17a-101a of the Connecticut General Statutes, as amended, relating to mandatory reporting, when an allegation of abuse or neglect or sexual assault has been substantiated.

14. Non-Discrimination Policy/Prohibition Against Retaliation

The School expressly prohibits retaliation against individuals reporting child abuse or neglect or the sexual assault of a student by a school employee and shall not discharge or in any manner discriminate or retaliate against any employee who, in good faith makes a report pursuant to this policy, or testifies or is about to testify in any proceeding involving abuse or neglect or sexual assault by a school employee. The School also prohibits any employee from hindering or preventing or attempting to hinder or prevent any employee from making a report pursuant to this policy or state law concerning suspected child abuse or neglect or the sexual assault of a student by a school employee or testifying in any proceeding involving child abuse or neglect or the sexual assault of a student by a school employee.

15. Distribution of Policy and Posting of Careline Information

This policy shall be distributed annually to all school employees employed by the School. The School shall document that all such school employees have received this written policy and completed the training and refresher training programs required by in Section 16, below. The School shall post the Internet website address and telephone number for the DCF Child Abuse and Neglect Careline in a conspicuous location frequented by students in the school.

16. Training

a) All new school employees, as defined above, shall be required to complete an educational training program for the accurate and prompt identification and reporting of child abuse and neglect. Such training program shall be developed and approved by the Commissioner of DCF.

b) All school employees, as defined above, shall take a refresher training course developed and approved by the Commissioner of DCF at least once every three years.

c) The Executive Director shall annually certify to the Board of Directors that each school employee, as defined above, working at such school, is in compliance with the training provisions in this policy and as required by state law. The Executive Director shall certify such compliance to the State Board of Education.

17. Records

a) The School shall maintain in a central location all records of allegations, investigations and reports that a child has been abused or neglected by a school employee employed by the School or that a student has been a victim of sexual assault by a school employee employed by the School, as defined above, and conducted in accordance with this policy. Such records shall include any reports made to DCF. The State Department of Education shall have access to such records upon request.

b) Notwithstanding the provisions of Conn. Gen. Stat. §10-151c, the School shall provide the Commissioner of DCF, upon request and for the purposes of an investigation by the Commissioner of DCF of suspected child abuse or neglect by a teacher employed by the School, any records maintained or kept on file by the School. Such records shall include, but not be limited to, supervisory records, reports of competence, personal character and efficiency maintained in such teacher's personnel file with reference to evaluation of performance as a professional employee of the School, and records of the personal misconduct of such teacher. For purposes of this section, "teacher" includes each certified professional employee below the rank of Executive Director employed by the School in a position requiring a certificate issued by the State Board of Education.

18. Child Sexual Abuse and/or Sexual Assault Response Policy and Reporting Procedure

The School has adopted a uniform child sexual abuse and/or sexual assault response policy and reporting procedure in connection with the implementation of its sexual assault and abuse prevention and awareness program, as outlined in its Child Sexual Abuse and/or Sexual Assault Response Policy and Reporting Procedure. Upon receipt of any report of child sexual abuse and/or sexual assault from any source, a school employee shall report such suspicion to the Safe School Climate Coordinator in addition to complying with his/her obligations under this Policy and the law regarding mandatory reporting of abuse, neglect and sexual assault.

Legal References:

Connecticut General Statutes:

Section 10-151
Section 10-221s
Section 10-222
Section 17a-101 et seq
Section 17a-101q, Statewide Sexual Abuse and Assault Awareness and Prevention Program
Section 17a-103
Section 46b-12
Section 53a-65

CONNECTICUT STATE DEPARTMENT OF EDUCATION
Complaint Resolution Procedure
Elementary and Secondary Education Act
34 Code of Federal Regulations (CFR) Part 299(10)(a)

I. Filing of Complaint

A. Violation of Law

A written complaint may be filed by an organization or individual with the Connecticut Commissioner of Education alleging that the state educational agency (SEA) or an agency or consortium of agencies is violating a federal statute or regulation that applies to the following applicable programs:

1. Part A of Title I (Improving Basic Programs Operated by Local Educational Agencies).
2. Part B, Subpart 1 of Title I (Reading First).
3. Part B, Subpart 3 of Title I (Even Start Family Literacy Programs).
4. Part D of Title I (Children and Youth Who Are Neglected, Delinquent, or At Risk of Dropping Out).
5. Part A of Title II (Teacher and Principal Training and Recruiting Fund).
6. Part D of Title II (Enhancing Education Through Technology).
7. Part A of Title III (English Language Acquisition, Language Enhancement, and Academic Achievement Act).
8. Part B, Subpart 4 of Title III (Emergency Immigrant Education Program).
9. Part A of Title IV (Safe and Drug-Free Schools and Communities).
10. Part A of Title V (Innovative Programs).

B. Review of an Appeal

A written complaint may be filed by an individual with the Connecticut Commissioner of Education appealing the decision of an agency or consortium of agencies based on prior written complaint presented by an individual to such agency or consortium of agencies.

C. Content of Complaint

The complaint shall be in writing, signed by the complainant and contain the following:

1. A statement that the SEA or an agency or consortium of agencies has violated a requirement of federal statutes or regulation regarding the applicable program, or in the case of an appeal, a statement of aggrievement with the decision rendered by the agency or consortium of agencies based on a prior written complaint.

2. A clear and concise description of the facts on which the statement is based and the specific alleged violation or aggrievement.

3. A description of prior efforts to resolve the complaint, including information demonstrating that the SEA, agency or consortium of agencies has taken action adverse to the complaint or has refused or failed to take action within a reasonable period of time.

4. Complainant's and respondent's name, address and telephone number.

5. Other materials or documents containing information which support or clarify the statement.

II. Review of Complaint

A. Analysis

Within three business days of the receipt of the complaint, the Commissioner shall assign a review official. Within five business days of the assignment, the review official shall determine whether the complaint has been properly filed in accordance with Section I. If necessary, the review official shall interview the complainant.

B. Dismissal of Complaint

The review official may dismiss the complaint in writing stating an explanation for such action. The grounds for dismissal shall include, but not limited to, the following:

1. Failure to file a proper complaint pursuant to Section I.
2. The allegations fail to state a bona fide violation of federal statute or regulations by the SEA or an agency or consortium of agencies.
3. The allegations fail to state a bona fide aggrievement with the decision rendered by an agency or consortium of agencies based on prior written complaint.
4. The allegations were not caused by the actions or failure to act by the SEA, agency or consortium of agencies.

III. Notification of Complaint and Investigation

If a complaint is not dismissed, the review official shall forward the complaint to the respondent immediately along with a copy of the Complaint Resolution Procedures.

IV. Response to Complaint

Within 10 business days of the receipt of the complaint from the review official, the respondent shall file with the Commissioner a written response to the complaint.

A. Content of Response

The response shall address each and every allegation of the complaint and shall list the respondent's name, address and telephone number.

B. Interview

The review official or the respondent may request an interview to discuss the response and to resolve the dispute informally.

V. Complaint Investigation

Upon completion of Section IV or the failure of the respondent to file a response, the review official shall conduct an investigation. All parties may be duly notified that an investigation has begun. At any time during the investigation, the review official shall attempt to resolve the dispute informally.

Within 60 calendar days of the receipt of the complaint, an investigation of the complaint shall be completed and a written report shall be mailed to both parties. Information shall be gathered in a timely manner, while minimizing any inconvenience or disruption to the complainant or respondent.

Concerning a review of an appeal of the decision of an agency or consortium of agencies, the review official may elect to disregard the procedures contained in this section using in lieu thereof the following abbreviated procedure.

1. Review all of the appropriate records and determine whether the decision of the agency or consortium of agencies shall be affirmed, reversed or modified.
2. Draft a letter of review of an appeal addressing, but not limited to, the issue in dispute, the facts found, the affirmation, reversal or modification of the lower decision and recommendation for improved practices, policies or procedures.

A. Data Collection

The complainant and respondent shall provide the review official with copies of all relevant records requested in writing. Telephone interviews of the complainant, respondent and others with knowledge of the allegations may be conducted.

Pursuant to 34 CFR 99-35(a) the review official, acting on behalf of the SEA, is authorized to have access to education records in connection with an evaluation of federal or state-supported education programs or for the enforcement of or compliance with federal legal requirements which relate to those programs.

B. Independent On-Site Investigation

The review official may conduct an on-site visit to investigate the complaint if the official deems it necessary.

Any on-site visit shall be coordinated with the respondent.

C. Complaint Investigation Report

The Complaint Investigation Report shall be completed by the review official and mailed to the parties within 60 calendar days of the receipt of the complaint by the SEA. The Commissioner may grant an extension for the completion of the report on written request of the review official or respondent if exceptional circumstances exist with respect to the particular complaint. Such extension shall be in writing and shall be mailed to the parties.

The report shall contain the following contents:

1. Summary of all investigation activities including, but not limited to, date of receipt of complaint, allegations, parties interviewed, documents received and dates of on-site visits.
2. Specific allegation of the complaint, the findings of fact, conclusions and final decisions rendered regarding each allegation, including citation to applicable federal statute or regulation.
3. Specific corrective action plan that resolves the complaint or ensures future compliance of the respondent regarding the violation of federal statute or regulation.
4. Recommendations for improved practices, policies or procedures shall be offered when no violation of federal statute or regulation is found.

D. Corrective Action Plan

If the Complaint Investigation Report finds that the respondent is violating federal statute or regulations, the respondent shall be requested to submit a corrective action plan within a specified period of time as determined by the review official.

Respondent may request technical assistance from the SEA in order to prepare a plan to achieve compliance.

VI. Review of Final Decision

The complainant may file a written request with the Secretary of the U.S. Department of Education to review the final decision of the SEA.

All local educational agencies shall disseminate information about the complaint procedures to teachers, staff, parents and appropriate private school officials or representatives.

A private school official shall have the right to complain that a local educational agency did not engage in consultation that was meaningful and timely, or did not give due consideration to the views of the private school official.

Website

For a quick and easy way to access information about ISAAC use our websites: www.isaacschool.org.

ISAAC BOARD OF DIRECTOR POLICIES

All ISAAC Board Policies, including the Personnel Series of policies listed below, can be found on the ISAAC website along with other ISAAC Board policies: www.isaacschool.org

4000 - Concepts and Roles in Personnel
4002 - Alcohol Tobacco and Drug-Free Workplace
4003 - Athletic Coaches Evaluation and Termination
4004 - Non-Discrimination (Personnel)
4006 - Reports of Suspected Abuse or Neglect of Adults with an Intellectual Disability
4007A - Concussion Training for Athletic Coaches
4008 - Use of School Computer System and Electronic Communications
4009 - Personnel Employment Checks
4100 - Appointment and Conditions of Employment.docx
4101 - Provisions of Negotiated Agreements-Contracts.docx
4102 - Certification.docx
4103 - Evaluations and Support Program.docx
4104 - Personnel Records
4111 - Hiring of Certified Staff
4112 - Termination-Non-Renewal-Suspension.docx
4114 - Resignation
4115 - Substitute Teachers
4116 - Student Teachers
4118 Staff Student Non-Fraternization
4140/4240 - Child Abuse and Neglect Reporting
4143 - Psychotropic Drugs
4152.6/4252/6 - Family and Medical Leave
4180/4280 - Minority Education and Staff Recruitment
4211 - Hiring of Non-certified Staff
4218 - Personnel Sex Discrimination and Harassment in the Workplace.pdf
4301 - Non-School Employment
4302 - Employee Protection
4304 - Conduct
4306 - Travel
4305 - Creation and-or Publication of Materials
4418 - Social Media
4504 – Section 504-ADA (Personnel)
5140 - Child Sexual Abuse
6173 - Parental Access to Instruction

EQUAL OPPORTUNITY AND NON-DISCRIMINATION STATEMENT

ISAAC is an equal opportunity employer. All aspects of employment including the decision to hire, promote, discipline, or discharge, will be based on merit, competence, performance, and business needs. We do not discriminate on the basis of race, color, religion, marital status, age, national origin, alienage, ancestry, physical or mental disability, pregnancy, genetic information, sex, sexual orientation, gender identity or expression, veteran status, or any other status protected under federal, state, or local law.