AMHERST, PELHAM, AND AMHERST-PELHAM REGIONAL SCHOOL DISTRICTS

Districts Procedure

Civil Rights Grievance Procedure

Procedure Code	AC-R
Department / Office	Office of Family Advocacy and Student Wellbeing (student matters); Office of Strategy and Human Resources (employment matters)
Effective Date	10/20/2026
Version	1.0
Approved By	Superintendent
Next Review Date	June 30, 2027

1. PURPOSE

This procedure carries the Districts' non-Title IX grievance process for discrimination, harassment, and retaliation on a protected basis: how a complaint is received, assessed, investigated, determined, and appealed.

2. APPLICABILITY

This procedure applies across the Amherst, Pelham, and Amherst-Pelham Regional School Districts (the "Districts") and to every school, program, and activity the Districts operate or sponsor, on or off school grounds. Every staff member who becomes aware of a matter within its subject acts under it. The roles named in Section 4 carry defined responsibilities; naming them does not narrow the duty of any other staff member. Conduct occurring off campus at a non-school sponsored activity is within reach where it creates a hostile environment at school.

The Districts are committed to maintaining school environments free of discrimination, harassment, or retaliation on any protected basis defined in Section 3. Harassment, discrimination, and retaliation in any form or for any reason is prohibited. This includes harassment or discrimination by administrators, personnel, students, vendors, and other individuals in school or at school-related events. Retaliation against any individual who has brought harassment or discrimination to the attention of school officials or who has cooperated in an investigation of a complaint under this Procedure is unlawful and will not be tolerated by the Districts.

Persons who engage in harassment, discrimination, or retaliation may be subject to disciplinary action, including, but not limited to reprimand, suspension, termination/expulsion, or other sanctions as determined by the Districts' administration, subject to applicable procedural requirements.

2.1 Non-Applicability of This Procedure to Title IX Sexual Harassment Allegations

This *Civil Rights Grievance Procedure* shall not apply to reports of sexual harassment as defined under Title IX of the Education Amendments of 1972 and its implementing regulations ("Title IX") effective August of 2020.

Allegations of conduct that could, if proven, meet the definition of sexual harassment under Title IX shall be addressed through the Districts' *Title IX Sexual Harassment Grievance Procedure.* Similarly, allegations of conduct that meet the definition of sexual harassment under Title IX, and simultaneously meet the definitions of sexual harassment under Title VII (employees), M.G.L. c. 151B (employees), and/or M.G.L. c. 151C (students), will also be addressed through the *Title IX Sexual Harassment Grievance Procedures.*

Allegations of conduct that do not meet the definition of sexual harassment under Title IX, but could, if proven, meet the definition(s) of sexual harassment under Title VII (employees), M.G.L. c. 151B (employees), and/or M.G.L. c. 151C (students), will be addressed through this Procedure.

2.2 Relationship to Adopted Policy

Policy AC states the Districts' commitment to nondiscrimination and directs the Superintendent to adopt and publish one or more grievance procedures for reports of discrimination, harassment, and retaliation. This is that grievance procedure. Policy JICFC prohibits harassment of students by other students, employees, vendors, and third parties and directs the Superintendent to develop administrative guidelines and procedures for its implementation. This procedure serves that function; a student non-Title IX harassment complaint on a protected basis is received, assessed, investigated, and determined here. Policies ACAA, ACB, and ACE state commitments this procedure carries into practice for identity-affirming culture, affirmative action, and nondiscrimination on the basis of disability. Where a conflict is identified between this procedure and the summary text of any of those policies, this procedure controls as the more detailed instrument, and the policy is updated to match at its next revision.

3. DEFINITIONS

For the purposes of this Procedure, and except where a term is defined by role in Section 4:

Term	Definition
Discrimination	Discrimination or harassment on a protected basis by which an individual is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity of the Districts.
Harassment	Unwelcome conduct on a protected basis that is sufficiently severe, persistent, or pervasive to create or contribute to a hostile environment for the individual at school. "Harassment" based on sex, as it applies to this procedure, is defined below. Harassment may include insults, name-calling, off-color jokes, threats, comments, innuendoes, notes, display of pictures or symbols, gestures, or other conduct which rises to the level of a hostile environment. A hostile environment is one which unreasonably interfered with an individual's participation in, denied

	the individual the benefits of, or otherwise subjected the individual to discrimination under any program or activity of the Districts.[1]
Hostile Environment	When determining whether an environment is hostile, the Districts shall consider the context, nature, frequency, and location of the incidents as well as the credibility of witnesses and the identity, number, and relationships of the persons involved. The Districts must consider whether the alleged harassment was sufficient to have created such an environment for a reasonable person of the same age, gender, and experience as the Complainant, and under similar circumstances. Conduct does not constitute harassment where the incident occurs off-campus at a non-school sponsored activity and does not create a hostile environment at school for the victim.
Non-Title IX Sexual Harassment — M.G.L. c. 151B, § 1 (employees)	Sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment. Discrimination on the basis of sex shall include, but not be limited to, sexual harassment.
Non-Title IX Sexual Harassment — M.G.L. c. 151C, § 1 (students)	Sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of the provision of the benefits, privileges or placement services or as a basis for the evaluation of academic achievement; or (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's education by creating an intimidating, hostile, humiliating or sexually offensive educational environment.
Non-Title IX Sexual Harassment — Title VII of the Civil Rights Act of 1964	Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment 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 unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. A hostile environment on the basis of sex is created when the conduct is sufficiently severe or pervasive to alter the conditions of employment.
Natural or Protective Hairstyle	Hair texture and hair type, and hairstyles, which shall include but not be limited to natural or protective hairstyles such as braids, locks, twists, and Bantu knots. As provided by M.G.L. c. 76, § 5, the Districts may not adopt or implement a policy or code that impairs or prohibits a natural or protective hairstyle.
Shared Ancestry or Ethnic Characteristics	Actual or perceived shared ancestry or ethnic characteristics, or citizenship or residency in a country with a dominant religion or distinct religious identity. Harassment on this basis, including antisemitic, anti-Muslim, anti-Arab, and anti-Palestinian harassment, is discrimination within Title VI and is addressed under this Procedure.
Retaliation	Retaliatory acts against any individual who exercises his or her rights under the civil rights statutes covered by this Procedure or the sexual harassment procedure

[1] As noted above, allegations of conduct that could, if proven, meet the definition of sexual harassment under Title IX shall be addressed through the Districts' *Title IX Sexual Harassment Grievance Procedures*.

	are considered to be discrimination and are unlawful. Individuals are prohibited from coercing, intimidating, threatening, or interfering with an individual because the individual exercised any right granted or protected under these procedures.
Complainant	An individual who is alleged to be the victim of conduct that could constitute discrimination, harassment, or retaliation under this Procedure. Parents and/or legal guardians of a complainant are not considered a complainant but may file formal complaints on behalf of a minor child and act on behalf of the minor child in any civil rights matter.
Respondent	An individual who has been reported to be the perpetrator of conduct that could constitute discrimination, harassment, or retaliation under this Procedure.
Reporter	A third party who has not experienced but is aware of the occurrence of prohibited conduct and brings a complaint under this Procedure.
Party or Parties	The Complainant and/or Respondent.
Principal	The Principal or Principal's designee.
Interim Measures	The prompt and reasonable measures the Districts provide during the pendency of an investigation under Section 6.8.

4. ROLES AND RESPONSIBILITIES

The roles below are stated by function. The Districts maintain the current personnel assignment for each on the nondiscrimination page of the Districts' website, in each school handbook, and in the district code of conduct.

Role	Responsibility
Any staff member	Any employee who observes or receives a report of discrimination, harassment, or retaliation promptly notifies the Principal or a Civil Rights Coordinator. Any employee who observes discrimination, harassment, or retaliation against a student intervenes to stop the conduct and reports it to the Principal. A complaint is not dismissed because it was reported to the incorrect school personnel.
Principal or designee	Receives complaints; promptly informs the relevant Civil Rights Coordinator of any report; conducts the initial assessment under Section 6.7 where the matter is building-based; investigates or designates an investigator; identifies and monitors interim measures; and maintains the building file of harassment reports required by Policy JICFC.
Civil Rights Coordinator for Students	Office of Family Advocacy and Student Wellbeing. Coordinates the Districts' compliance for student-facing matters under Title VI, Section 504, Title II, the Age Act, M.G.L. c. 76, § 5, c. 151C, and 603 CMR 26.00; receives complaints and informal reports; conducts or assigns the initial assessment and investigation; determines interim measures; issues the notice of outcome; and maintains the Districts' civil rights complaint record.
Civil Rights Coordinator for Employment	Office of Strategy and Human Resources. Coordinates the Districts' compliance for employment matters under Title VII, M.G.L. c. 151B, the ADA, and Section 504 as applied to employees; receives and investigates complaints in which an employee is the Complainant or the Respondent; and ensures that a complaint against an employee who holds a supervisory

	position is investigated by a person who is not subject to that supervisor's authority.
Title IX Coordinator	Receives any allegation that could, if proven, meet the Title IX definition of sexual harassment and initiates ACAB-R.
Section 504 / ADA Coordinator	Consulted on any complaint in which a party is a student or employee with a disability, on the interaction between interim measures and an IEP or 504 plan, and on any disability-based access question the complaint surfaces. Held in Student Services for students and in Human Resources for employees.
Superintendent or designee	Receives a report where the allegation is against a Principal or a Civil Rights Coordinator; decides appeals under Section 6.15; designates the Coordinators annually; and, under 603 CMR 26.07(4), directs effective procedures for the full implementation of the Districts' equal educational opportunity obligations.
Administrator of Mental Health and Behavioral Services	Systems oversight. Confirms the concern is logged and closed in the Report a Concern record; reviews civil rights and harassment concern data in de-identified, aggregate form to identify district-wide patterns and to inform prevention, professional development, and resource decisions; and coordinates the annual program evaluation required by 603 CMR 26.07(1).
Office of Strategy and Human Resources	Maintains the training and acknowledgment record for the annual in-service training required by 603 CMR 26.07(3), and the employment-side records of any complaint resolved under this Procedure.

4.1 Conflict of Interest and Investigator Assignment

The complaint is investigated by the Principal, a Civil Rights Coordinator, or another individual designated by the Principal or a Civil Rights Coordinator who has responsibility for seeking and gathering evidence relative to the investigation. A formal complaint against an employee who holds a supervisory position is investigated by a person who is not subject to that supervisor's authority. Where the report involves an accusation against a Principal or a Civil Rights Coordinator, the employee reports the incident to the Superintendent or designee.

4.2 Designation and Publication

The Superintendent designates the Civil Rights Coordinators annually and publishes their names, titles, office addresses, e-mail addresses, and telephone numbers on the Districts' nondiscrimination webpage, in each school handbook, and in the district code of conduct, as Policy AC and 603 CMR 26.08 require. A change in personnel is made on the published roster and does not require a revision of this Procedure.

5. PREREQUISITES AND MATERIALS

The following are in place before and while this procedure runs.

- Annual in-service training for all school personnel on the prevention of discrimination and harassment on every protected basis and on the methods of response this Procedure requires, under 603 CMR 26.07(3). The Office of Strategy and Human Resources maintains the acknowledgment record.

- Annual publication of the nondiscrimination policy, this complaint procedure, and the applicable disciplinary measures in every school handbook and in the district code of conduct, under 603 CMR 26.08, with availability in a parent's or student's primary language on request.
- Current designation and published contact information for the Civil Rights Coordinator for Students, the Civil Rights Coordinator for Employment, the Title IX Coordinator, and the Section 504 / ADA Coordinator.
- Access to the forms and letters indexed at Section 11 and to the Report a Concern intake record.
- Interpretation and translation capacity sufficient to receive a complaint, conduct an interview, and issue a notice of outcome in the primary language of a party.

6. PROCEDURE

This process branches. The initial assessment at Section 6.7 routes a matter to dismissal, referral, informal resolution, or investigation. Interim measures under Section 6.8 run alongside.

6.1 How to Make a Complaint

Any student or employee who believes that he/she has been discriminated against or harassed should report their concern promptly to the Principal or a Civil Rights Coordinator. Students may also report incidents of harassing conduct to a teacher, administrator, or guidance counselor. Any complaint received by school personnel shall be promptly reported to the Principal or a Civil Rights Coordinator. A complaint will not be dismissed because it was reported to the incorrect school personnel. Students or employees who are unsure whether discrimination, harassment, or retaliation has occurred are encouraged to discuss the situation with the Principal. There may be instances where a third party, who has not experienced but is aware of the occurrence of prohibited conduct, may bring a complaint under this Procedure. In such circumstances, that person is referred to as the “reporter.”

6.2 Employee Duty to Report and to Intervene

Any employee who observes or receives a report of discrimination, harassment, or retaliation shall promptly notify the Principal or a Civil Rights Coordinator, identified in Section 4. Any employee who observes discrimination, harassment, or retaliation against a student should intervene to stop the conduct and report it to the Principal. Upon receipt of a report of discrimination, harassment, or retaliation, the Principal shall promptly inform the relevant Civil Rights Coordinator of the report, and the Districts will respond in a manner consistent with this Procedure. If the report involves an accusation against a Principal or a Civil Rights Coordinator, the employee shall report the incident to the Superintendent or designee.

6.3 Informal Reports

Individuals may wish to file a formal complaint of discrimination, harassment or retaliation, or to report informally, that is, without initiating a formal complaint. Such informal reports may be made to the Principal or a Civil Rights Coordinator. The Districts shall inform anyone making an informal report that he or she may initiate a formal complaint at any time, regardless of what steps are being or have been taken in response to an informal report.

6.4 Anonymous Reports

Complainants and reporters should be aware that although the Districts will often be able to maintain the confidentiality of reporting persons, the Districts may sometimes be required to take actions to protect the safety of the school community that may result in the identity of the reporting person being disclosed, to the police, for example. When reporters or Complainants seek to remain anonymous or have their identities kept confidential, they will be informed that honoring such a request may limit the ability of the Districts to respond fully to any reported event, including limitations on the ability to take disciplinary action against a Respondent.

6.5 Informal Process

If the Districts conclude that it is possible to resolve a matter, whether after formal complaint or an informal report, in a prompt, fair, and adequate manner through an informal process involving, and with the consent of, the Complainant and Respondent, the Districts may seek to do so. The informal process is voluntary, and the Complainant and/or Respondent may terminate or decline any informal process at any time, without penalty.

6.6 Formal Process

A formal complaint shall state, if known to the reporter or Complainant, the name(s) of the persons involved and witnesses to the conduct, describe the conduct, and identify, to the extent possible, the dates and locations of the conduct. The complaint shall be signed and dated by the reporter and/or Complainant. Complaints will be investigated promptly and equitably by a Civil Rights Coordinator or the Principal. Investigations may be initiated whenever warranted, in the absence of a formal complaint, or after a formal complaint has been withdrawn.

6.7 Initial Assessment

The Civil Rights Coordinator or Principal will make an initial assessment following a complaint. Based on that assessment, the Civil Rights Coordinator or Principal may: (a) if the conduct, even if substantiated, would not constitute harassment, discrimination, or retaliation, dismiss the complaint; (b) if the alleged conduct could not, even if true, constitute discrimination, harassment or retaliation, but is within the scope of another procedure, refer the matter to the appropriate personnel; (c) if it is possible to resolve the complaint in a prompt, fair and adequate manner through an informal process involving and with the consent of both parties, may seek to do so in accordance with Section 6.5; or (d) if the alleged conduct, if substantiated, would constitute discrimination, harassment or retaliation, initiate an investigation. The Civil Rights Coordinator or Principal may also identify and initiate any interim measures. See Section 6.8.

Written notice of a dismissal or referral under (a) or (b), stating its basis and the opportunity to appeal under Section 6.15, is provided to the Complainant and, where the Respondent has been notified of the complaint, to the Respondent. A dismissal under this Procedure does not preclude action under another provision of Districts policy or the code of conduct.

6.8 Interim Measures

The Districts will provide prompt and reasonable interim measures during the pendency of the investigation, if appropriate, to support and protect the safety of the parties, the educational environment,

and the school community; to deter retaliation; and to preserve the integrity of the investigation and resolution process. Any interim measures will be monitored to ensure they are effective based on the evolving needs of the parties. Violations of the restrictions imposed by interim measures could be considered a violation of school rules and may be considered in determining whether discrimination, harassment or retaliation has occurred.

6.9 Timeframes

The Districts will seek to complete any investigation within twenty (20) school days after receipt of a complaint and provide the written notice of the outcome of the investigation within twenty-five (25) school days. The investigator may impose reasonable timeframes on all parties to facilitate the timely completion of the investigation. The investigator may extend the investigation period beyond the time period identified due to extenuating circumstances, including but not limited to the availability and cooperation of witnesses, the complexity of the investigation, school vacation periods, and the involvement of law enforcement and other outside agency investigations. If a complaint or report of discrimination, harassment, or retaliation is received within three (3) weeks of the end of the academic school year, the investigator will attempt to complete the investigation by the end of the school year. In the event that the investigation extends beyond the last day of school, the Districts will make reasonable efforts to complete the investigation within the above-referenced time frame but may extend the investigation period to account for the availability of witnesses during the summer vacation period. If the investigator extends the investigation, he or she will notify the Complainant and Respondent of the extension. A report to law enforcement will not automatically delay an investigation; however, a request from law enforcement to delay the investigation may require a temporary suspension of an investigation, and the Districts will promptly resume the investigation upon being advised that law enforcement's evidence gathering is completed. Any interim measures provided to the parties may continue during the period of postponement. See Section 6.8.

6.10 Formal Resolution Procedure

Under the formal resolution procedure, the complaint will be investigated by the Principal, a Civil Rights Coordinator, or another individual designated by the Principal or a Civil Rights Coordinator who has responsibility for seeking and gathering evidence relative to the investigation. A formal complaint against an employee who holds a supervisory position shall be investigated by a person who is not subject to that supervisor's authority. During the formal resolution procedure:

- The Complainant shall be provided with an opportunity to be heard and have the opportunity to identify witnesses and other relevant evidence to the investigator.
- The Respondent will be provided with an opportunity to be heard as part of the investigation including the opportunity to provide relevant information and identify witnesses for the investigator's consideration.
- The privacy rights of the parties shall be maintained in accordance with applicable state and federal laws.
- The investigator will keep a written record of the investigation process.
- The investigation will be completed within twenty (20) school days of the date of receipt of the complaint.

- The notification of the outcome of the investigation, including, if appropriate, a description of the remedies taken, will be provided to the parties within twenty-five (25) school days of the receipt of the complaint unless extended for good cause.

Nothing in this Procedure will preclude the investigator, in his or her discretion, from completing the investigation sooner than the time period described above.

6.11 Standard of Proof

The investigation shall make factual findings based on a preponderance of the evidence standard.

6.12 Determination and Remedial Steps

If the investigator determines that discrimination, harassment, or retaliation has occurred, the Districts shall take steps to eliminate the discriminatory or harassing environment, which shall include but not be limited to:

- Identifying what steps are necessary to prevent the recurrence of any discriminatory behavior, including but not limited to harassment or retaliation, and to correct its discriminatory effects if appropriate; and
- Informing the Complainant and Respondent and the parties' parent(s)/legal guardian(s) of the results of the investigation, in accordance with applicable state and federal privacy laws and with the above timelines. The notification will include notice that the parties have a right to appeal consistent with this procedure.

6.13 Discipline

The Districts' administration may also refer the offender for disciplinary procedures to be conducted in accordance with federal and state law. Nothing in this Procedure shall be interpreted as limiting or prohibiting the Districts' ability to take appropriate disciplinary action against the offender in accordance with the applicable code(s) of conduct or employment contracts or policies, where appropriate, prior to completion of the investigation, in accordance with the due process rights of employees and students, as applicable.

6.14 Two Tracks That Do Not Collide

The determination of whether discrimination, harassment, or retaliation occurred is made under this Procedure by the investigator. Any disciplinary consequence is imposed separately by the building administrator under the code of conduct, or by the employing authority under the applicable employment contract or collective bargaining agreement, and carries its own due process. A determination under this Procedure does not itself impose discipline.

6.14 Appeal

If the Complainant or the Respondent is dissatisfied with the results of the investigation, an appeal may be made to the Superintendent or designee within seven (7) calendar days after receiving notice of the outcome of the investigation, except for circumstances in which the Respondent is subject to long-term suspension as a result of a finding of discrimination, harassment or retaliation. In such an instance, the appeal rights of the Respondent will be provided in a manner consistent with the disciplinary due process requirements applicable to the circumstances, for example M.G.L. c. 71, §§ 37H, 37H½ or 37H¾. Appeals must be made in writing, and e-mail is sufficient, to the Superintendent of Schools,

hermanx@arps.org, 170 Chestnut Street, Amherst, Massachusetts 01002. The Superintendent or designee will decide the appeal within thirty (30) calendar days of the date of receipt of the written appeal.

Other Considerations:

- Suspected abuse or neglect. Where the facts indicate abuse or neglect of a child, the mandated-reporter duty under M.G.L. c. 119, § 51A is discharged immediately and independently under JLF-R. The reporting duty is not deferred pending the outcome of this Procedure.
- Risk of self-harm. Where the matter presents a wellbeing or safety concern, it routes in parallel to ADD-R and the Districts' suicide risk and self-harm response, and support is offered regardless of the status of the complaint.
- Conduct on Districts networks or devices. Where the conduct occurred through Districts-provided accounts, networks, or devices, IJNDB-R2 governs the digital-safety response and the preservation of the electronic record.
- Students with disabilities. Where a party is a student with a disability, the Section 504 / ADA Coordinator or IEP Team Chair is consulted on interim measures, on the accessibility of the investigation, and on any consequence that would constitute a change in placement.

6.17 Records and Retention

The investigator keeps a written record of the investigation process. Each school documents all harassment reports in a file maintained by the Principal or designee, as Policy JICFC requires. The Civil Rights Coordinator maintains the Districts' record of complaints, assessments, investigations, determinations, interim measures, and appeals under this Procedure. Any records constituting student records will be maintained and accessed in accordance with the requirements of FERPA, M.G.L. c. 71, §§ 34D and 34E, and 603 CMR 23.00. The Administrator of Mental Health and Behavioral Services receives de-identified aggregate data only.

6.17 Employment Agency Information

Nothing in this Procedure limits the right of a parent, guardian, employee, or person affected to seek enforcement in any court or administrative agency of competent jurisdiction.

Agency	Jurisdiction and contact
U.S. Equal Employment Opportunity Commission (EEOC), Boston Area Office	Employment discrimination. John F. Kennedy Federal Building, 15 New Sudbury Street, Room 475, Boston, MA 02203-0506; 1-800-669-4000; https://www.eeoc.gov/field-office/boston/location
Massachusetts Commission Against Discrimination (MCAD), Boston Headquarters	Employment, education, and public accommodation discrimination under M.G.L. c. 151B and c. 151C. One Ashburton Place, Sixth Floor, Room 601, Boston, MA 02108; (617) 994-6000; https://www.mass.gov/orgs/massachusetts-commission-against-discrimination. A complaint must generally be filed within 300 days of the last discriminatory act.

7. PROTOCOLS

Situation	Governed by	Operational tool
Complaint reported to the wrong staff member	§ 6.1	AC-E1

Reporter or Complainant asks to remain anonymous	§ 6.4	AC-E2
Allegation against a Principal or a Civil Rights Coordinator	§ 4.1, § 6.2	AC-E3
Respondent holds supervisory authority over the assigned investigator	§ 4.1, § 6.10	AC-E3
Conduct could also meet the Title IX definition	§ 2.1	ACAB-R
Conduct could also meet the definition of bullying under § 37O	This Procedure and BPIP	BPIP and Appendix C
Facts indicate abuse or neglect of a child	§ 6.16	JLF-R
Matter presents a wellbeing or self-harm concern	§ 6.16	ADD-R
Conduct occurred on a Districts network, account, or device	§ 6.16	IJNDB-R2
A party is a student or employee with a disability	§ 6.16	504 / ADA Coordinator or Team Chair consult
Interim measures needed during the investigation	§ 6.8	AC-E6
Investigation cannot be completed within 20 school days	§ 6.9	AC-E7
Complaint received within three weeks of the end of the school year	§ 6.9	AC-E7
Law enforcement requests a delay	§ 6.9	AC-E7
Complaint dismissed or referred at initial assessment	§ 6.7	AC-E5
Appeal of outcome	§ 6.15	AC-E12, AC-E13

7.1 Time Frames

Step	Time frame
Investigation completed after receipt of complaint	20 school days
Written notice of the outcome provided to the parties	25 school days
Extension for extenuating circumstances	As needed, with notice to both parties
Appeal filed with the Superintendent	7 calendar days after notice
Superintendent decides the appeal	30 calendar days after receipt of the appeal

8. AUTHORITY AND REFERENCES

Authority

Type	Citation
Adopted policy	Policy AC, Commitment to Nondiscrimination and Educational Equity. Policy JICFC, Harassment of Students. Policy ACAA, Commitment to Identity-Affirming School Culture and Staff Accountability. Policy ACB, Affirmative Action on

	Cultural Diversity. Policy ACE, Nondiscrimination on the Basis of Disability. Policy JICFB, Bullying Prevention
Federal statute	Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e. Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681. Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794. Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132. The Age Discrimination Act of 1975, 42 U.S.C. § 6101.
Federal regulation	34 C.F.R. Part 100 (Title VI). 34 C.F.R. Part 104 (Section 504), including the designation and grievance-procedure requirements at § 104.7. 28 C.F.R. Part 35 (Title II), including § 35.107. 34 C.F.R. Part 106 (Title IX), the 2020 regulations, carried by ACAB-R.
Massachusetts statute	M.G.L. c. 76, § 5, equal educational opportunity, including natural and protective hairstyles. M.G.L. c. 151B, employment. M.G.L. c. 151C, educational institutions. M.G.L. c. 71, §§ 37H, 37H½, 37H¾, student discipline due process. M.G.L. c. 71, § 37O, bullying, where the conduct also meets that definition.
Massachusetts regulation	603 CMR 26.00, Access to Equal Educational Opportunity, including § 26.07(3) on annual in-service training, § 26.08 on handbook and code of conduct content, annual distribution, and primary-language availability, and § 26.09 on the private right of enforcement. 603 CMR 23.00, student records.

9. REVISION HISTORY

Date	Version	Description of change	Approved by
10/20	1.0	Initial release in the Districts Procedure format. Supersedes the prior Civil Rights Grievance Procedure.	E. Dr. Xiomara Herman

10. APPROVAL

Role	Signature	Date
Administrator of Mental Health and Behavioral Services	Colleen Bogonovich	10/15/2026
Executive Director of Family Advocacy and Student Wellbeing	Marta Guevara	10/15/2026
Executive Director of Strategy and Human Resources	Jennifer Ortiz	10/20/2026
Superintendent of Schools	E.Xiomara Herman	10/20/2026