

Title IX Policy

A. Purpose

This Policy is established in adherence with the federal 2020 Title IX regulations (“Title IX”) and all applicable Rhode Island statutes and regulations. The Paul Cuffee School is committed to maintaining and promoting an education environment free from all forms of discrimination, including harassment, on the basis of sex and gender. The civil rights of all school community members are guaranteed by law, and the protection of those rights are important to Paul Cuffee School.

This Policy applies equally to all of the Paul Cuffee School’s students, employees, authorized volunteers, parents, and other members of the Paul Cuffee School Community. This Policy applies to conduct at school, at school events, and away from school in all other instances where the Paul Cuffee School has a duty to investigate.

B. Notice of Non-Discrimination

The Paul Cuffee School does not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, ethnicity, age, disability, veteran, genetic information, or marital status in the delivery of its education programs and activities, and indeed, the Paul Cuffee School is required pursuant to Title IX not to discriminate in such a manner. If any member of the Paul Cuffee School Community has any questions or concerns with respect to this Policy and/or Title IX, he/she may contact the Paul Cuffee School Title IX Coordinator and/or the Department of Education’s Office of Civil Rights. The Paul Cuffee School’s Title IX Coordinator is identified within this Policy and shall be available to answer all questions concerning this Policy.

The Paul Cuffee School’s policy of non-discrimination in its educational programs and activities extends to employment and admission considerations.

C. Definitions

- *Advisor* means a person chosen by a party to accompany the party to meetings, interviews, or hearings related to the investigation and resolution process and to advise the party on that process.
- *At school* means in a classroom, all school common areas, on or immediately adjacent to school premises, on school property, on a school bus or other school-related vehicle, at a school bus stop, or at any school-sponsored or school-related activity or event whether or not it is on school grounds.
- *Authorized volunteers* means any person who 1) is not employed by the school, 2) does not receive any compensation from the school, 3) has undergone school-required criminal background checks, and 4) is permitted to provide services approved by Paul Cuffee School to the community, including

students, employees, and other partners.

- *Complainant* means an individual who is alleged to be the victim of conduct that could constitute sexual harassment based on a protected class or retaliation for engaging in a protected activity.

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- *Complaint (formal)* means a document submitted by a Complainant or their parent/guardian or signed by the Title IX Coordinator alleging sexual harassment or retaliation under this Policy and requesting that the district investigate the allegation.
- *Confidential Resource* means a non-Paul Cuffee School employee who is not a Mandated Reporter of notice of harassment and/or retaliation.
- *Consent* means the clear, knowing, affirmative, conscious, and voluntary words or actions that give permission for specific sexual activity.
- *Day* means a school day when the Paul Cuffee School is in normal operation.
- *Decision-maker* refers to those who have decision-making and sanctioning authority within the Paul Cuffee School's Formal Grievance process.
 - *Discrimination* means treating persons differently or interfering with or preventing them from enjoying the advantages or privileges afforded to others because of their membership in a protected class.
- *Education program or activity* means locations, events, or circumstances where the Paul Cuffee School exercises substantial control over both the Respondent and the context in which the sexual harassment occurs.
- *Final Determination* means a conclusion by preponderance of the evidence that the alleged conduct did or did not violate policy.
- *Finding* means a conclusion by preponderance of the evidence that the conduct did or did not occur as alleged (as in a "finding of fact").
- *Formal Grievance Process* means the method of formal resolution designated by the district to address conduct that falls within the policies included below, and which complies with the requirements of the Title IX regulations (34 CFR §106.45).
- *Grievance Process Pool* includes any investigators, Decision-makers, hearing officers, appeal Decision makers, and/or Advisors who may perform any or all of these roles (though not at the same time or with respect to the same case).
- *Investigator* means the person or persons assigned by the Paul Cuffee School to gather facts about an alleged violation of this Policy, assess relevance and credibility, synthesize the evidence, and compile this information into an investigation report and file of directly related evidence.
- *Mandated Reporter* means an employee of the Paul Cuffee School who is obligated by policy to share knowledge, notice, and/or reports of harassment and/or retaliation with the Title IX Coordinator

and/or their supervisor.

- *Non-Consensual Sexual Contact* means any intentional sexual touching, however slight, with any object, by a person upon another person that is without consent and/or by force.
- *Non-Consensual Sexual Intercourse* means any sexual intercourse however slight, with any object by a person upon another person that is without consent and/or by force.

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- *Notice* means that an employee, student, parent/guardian, or third-party informs the Title IX Coordinator or other Official with Authority of the alleged occurrence of harassing, discriminatory, and/or retaliatory conduct.
- *Official with Authority* (OWA) means any Paul Cuffee School employee.
- *Parties* include the Complainant(s) and Respondent(s), collectively.
- *Paul Cuffee School* means a K-12 education program that receives federal funding.
 - *Remedies* are applied following a Resolution to the Complainant and/or the community to address safety, prevent recurrence, and restore access to the Paul Cuffee School's educational program.
- *Respondent* means an individual who has been reported as having engaged in conduct that could constitute sexual harassment or retaliation under this Policy.
- *Resolution* means the result of an informal or Formal Grievance Process.
- *Sanction* means a consequence imposed by the Paul Cuffee School on a Respondent who is found to have violated this policy.
- *Sexual Contact* means intentional contact with the breasts, buttock, groin, or genitals, or touching another with any of these body parts, or making another touch you or themselves with or on any of these body parts; or any other intentional bodily contact in a sexual manner.
- *Sexual Intercourse* includes vaginal or anal penetration by a penis, object, tongue or finger, and oral copulation, no matter how light the penetration or contact.
- *Title IX Sexual Harassment* is conduct on the basis of sex that satisfies one or more the of the following:
 - (1) An employee of the school conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;
 - (2) unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity;
 - (3) "sexual assault" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30). See Title IX Coordinator's Manual for greater detail.
- *Title IX Coordinator* is the official(s) designated by the Paul Cuffee School to ensure compliance with Title IX and the Paul Cuffee School's Title IX program. References to the Title IX Coordinator throughout this policy may also include a designee of the Title IX Coordinator for specific tasks.

- *Title IX Team* refers to the Title IX Coordinator, any deputy coordinators, and any member of the Grievance Process Pool.

D. Title IX Coordinator

The Title IX Coordinator's responsibilities shall include, but are not limited to:

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- Coordinating Paul Cuffee School's compliance with Title IX, including the Paul Cuffee School's procedures for resolving Title IX Complaints;
- Drafting and publicizing procedures for reporting possible Title IX violations;
- Overseeing the prevention of sexual harassment and response to Title IX reports and complaints;
- Overseeing all investigations related to and/or arising from this Policy and ensuring fair, equitable, and timely resolution of complaints;
- Identifying and addressing any patterns or systemic problems revealed by such reports and complaints;
- Providing confidential (to the extent possible) written reports to the Head of School as requested. Reports shall be kept in a separate and secure Title IX file;
- Providing training to the Paul Cuffee School's employees, authorized volunteers, and other members of the Paul Cuffee School Community with respect to Title IX and the Paul Cuffee School's implementation of this Policy.

The Title IX Coordinator shall understand and have knowledge of the Title IX requirements and Paul Cuffee School's own policies and procedures on sexual harassment, bullying, and positive behavior/discipline.

Each and every report or complaint filed with Paul Cuffee School pursuant to Title IX or reasonably related to Title IX must be provided to the Title IX Coordinator.

Effective upon adoption of this Policy by the Board of Trustees, the Title IX Coordinator shall be:

Lilly Rebecca Coustan
459 Promenade St
Providence, RI 02908
Tel: (401) 453-2626
bcoustan@paulcuffee.org

E. Sexual Violence and Sexual Harassment

Sexual harassment and sexual violence are prohibited and will not be tolerated. The Paul Cuffee School expressly prohibits sexual harassment and sexual violence at school of or by a student to another student; a student of or by a member of the staff; student organizations; teachers; administrators; staff; and third parties (such as parents/guardians, guests, visitors, volunteers, and invitees). This Policy also prohibits sexual harassment and/or sexual violence by and among the Paul Cuffee School's employees and authorized volunteers. To this end, the Paul Cuffee School commits its staff to the implementation of a comprehensive and preventive approach that addresses the underlying reasons for this behavior and helps to create a better school community that supports learning and teaching for students and adults.

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F. Grievance Process

The Paul Cuffee School will act on any formal or informal notice/complaint of violation of the Policy that is received by the Title IX Coordinator or any other employee by applying these procedures.

The procedures below apply only to qualifying allegations of sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) involving students, staff, administrator, or faculty members.

If a dismissal occurs under these procedures or the allegations fall outside of the jurisdiction of these procedures, as determined by the Title IX Coordinator, the applicable procedures under the Student Handbook or the applicable employee handbook will be used to resolve the complaint.

The procedures below may be used to address collateral misconduct arising from the investigation of or occurring in conjunction with reported misconduct (e.g., vandalism, physical abuse of another). All other allegations of misconduct unrelated to incidents covered by the Policy will be addressed through procedures described in the Student and Employee handbooks.

G. Notice/Complaint

Upon receiving a complaint or notice, the Title IX Coordinator will initiate a prompt initial assessment. The Title IX Coordinator will offer supportive measures and/or begin the formal grievance process. The Title IX Coordinator will then determine if the conduct constitutes a potential Title IX violation, whether a Violence Risk Assessment is necessary.

The Paul Cuffee School must dismiss a formal complaint or any allegations therein if the conduct alleged would not constitute sexual harassment, the conduct did not occur at Paul Cuffee School or in its educational program or activity, or the complainant is not part of the Paul Cuffee Community.

The Paul Cuffee School may dismiss a formal complaint if the Complainant wishes to withdraw the complaint, the Complainant is no longer a member of the Paul Cuffee Community, or specific circumstances prevent the Paul Cuffee School from gathering the necessary evidence to reach a determination on the complaint. Dismissals are appealable under the procedures in the Paul Cuffee School Title IX Coordinator's Manual.

The Paul Cuffee School is obligated to ensure that the grievance process is not abused for retaliatory purposes. The Paul Cuffee School permits the filing of counterclaims but uses an initial assessment, described above, to assess whether the allegations in the counterclaim are made in good faith. Counterclaims by a Respondent may be made in good faith, but are, on occasion, also made for purposes of retaliation. Counterclaims made with retaliatory intent will not be permitted.

Counterclaims determined to have been reported in good faith will be processed using the grievance procedures below. Investigation of such claims may take place after resolution of the underlying initial allegation, in which case a delay may occur.

H. Right to an Advisor

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The parties may each have an Advisor of their choice present with them for all meetings, interviews, and hearings within the resolution process, if they so choose. Choosing an Advisor who is also a witness in the process creates potential for bias and conflict-of-interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-maker(s).

The parties may be accompanied by their Advisor in all meetings, interviews, and hearings at which the party is entitled to be present, including intake and investigation interviews. Advisors should help the parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith.

I. Informal Resolution Processes

Resolution proceedings are private. All persons present at any time during the resolution process are expected to maintain the privacy of the proceedings in accordance with The Paul Cuffee School's policies. The Paul Cuffee School encourages parties to discuss any sharing of information with their Advisors before doing so.

The Informal Resolution process cannot be initiated until such time that a formal complaint has been filed. The Informal Resolution cannot be utilized to resolve allegations than an employee sexually harassed a student.

The Title IX Coordinator may initiate an Informal Resolution Process by completing the following:

- (1) Written notice disclosing the allegations and the requirements of the informal resolution process including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations, provided however, that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint, and any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared; and
- (2) Obtain the parties' voluntary, written consent to the informal resolution process.

J. Grievance Process Pool

The Formal Grievance Process relies on a pool of administrators (“the Pool”) to carry out the process. Members of the Pool are announced in an annual distribution of this policy to all students, parents/guardians of students, employees, prospective students, and prospective employees. They are also listed in the Annual Title IX Report published by the Title IX Office.

K. Notice & Investigation

The Title IX Coordinator will provide written notice of the investigation and allegations (the “NOIA”) to the Respondent upon commencement of the Formal Grievance Process. This facilitates the Respondent’s ability to prepare for the interview and to identify and choose an Advisor to accompany them. The NOIA is also copied to the Complainant, who is to be given advance notice of when the NOIA will be delivered to the Respondent.

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The Paul Cuffee School will make a good faith effort to promptly investigate the allegations with consideration given to the nature of the allegations, the ability to promptly access evidence, and other circumstances that may delay the investigation and decision making process.

Once the Title IX Coordinator decides to begin a formal investigation, the Title IX Coordinator appoints Pool members to conduct the investigation (typically using a team of two Investigators), usually within two (2) school days of determining that an investigation should proceed.

Although there is an expectation of privacy around what Investigators share with parties during interviews, the parties have discretion to share their own knowledge and evidence with others if they so choose, with the exception of information the parties agree not to disclose related to Informal Resolution, discussed below.

Any individual materially involved in the administration of the resolution process including the Title IX Coordinator, Investigator(s), and Decision-maker(s), may neither have nor demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

The Title IX Coordinator will vet the assigned Investigator(s) to ensure impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. The parties may, at any time during the resolution process, raise a concern regarding bias or conflict of interest, and the Title IX Coordinator will determine whether the concern is reasonable and supportable. If so, another Pool member will be assigned and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Title IX Coordinator, concerns should be raised with the Head of School.

The Formal Grievance Process involves an objective evaluation of all relevant evidence obtained, including evidence that supports that the Respondent engaged in a policy violation and evidence that supports that the Respondent did not engage in a policy violation. Credibility determinations may not be based solely on an individual’s status or participation as a Complainant, Respondent, or

witness.

The Paul Cuffee School presumes that the Respondent is not responsible for the reported misconduct unless and until a final determination is made that this Policy has been violated.

Investigations are completed promptly though some investigations may take longer, depending on the nature, extent, and complexity of the allegations, availability of witnesses, police involvement, etc.

The Paul Cuffee School will make a good faith effort to complete investigations as promptly as possible and will communicate regularly with the parties to update them on the progress and timing of the investigation.

The Paul Cuffee School may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include but are not limited to a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of parties and/or witnesses, and/or accommodations for disabilities or health conditions.

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L. Steps in the Investigation Process

All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary.

All parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record.

The Investigator(s) typically take(s) the following steps, if not already completed (not necessarily in this order):

- Determine the identity and contact information of the Complainant
 - Commence a thorough, reliable, and impartial investigation by identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for all witnesses and the parties
- Meet with the Complainant to finalize their interview/statement, if necessary • Provide each interviewed party and witness an opportunity to review and verify the Investigator's summary notes (or transcript) of the relevant evidence/testimony from their respective interviews and meetings
- Provide the parties with the same opportunities to have others present during any grievance proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice
- When participation of a party is expected, provide that party with written notice of the date, time, and location of the meeting, as well as the expected participants and purpose • Interview

all available, relevant witnesses and conduct follow-up interviews as necessary • Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of the other party and witnesses, and document in the investigation report which questions were asked, with a rationale for any changes or omissions • Complete the investigation promptly and without unreasonable deviation from the intended timeline

- Provide regular status updates to the parties throughout the investigation
- Prior to the conclusion of the investigation, provide the parties and their respective advisors an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence upon which the Paul Cuffee 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.

Witnesses (as distinguished from the Parties) who are employees of the Paul Cuffee School are expected to cooperate with and participate in the Paul Cuffee School's investigation and resolution process. Failure of such witnesses to cooperate with and/or participate in the investigation or resolution process constitutes a violation of policy and may warrant discipline. Student witnesses and

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witnesses from outside the school community are encouraged to share what they know about the complaint.

Although in-person interviews for parties and all potential witnesses are ideal, circumstances (e.g., summer break) may require individuals to be interviewed remotely. Skype, Zoom, Google Meets, FaceTime, WebEx, or similar technologies may be used for interviews if the Investigator(s) determine that timeliness or efficiency dictate a need for remote interviewing. The Paul Cuffee School will take appropriate steps to reasonably ensure the security/privacy of remote interviews.

Witnesses may also provide written statements in lieu of interviews or choose to respond to written questions, if deemed appropriate by the Investigator(s), though not preferred.

No unauthorized audio or video recording of any kind is permitted during investigation meetings. If Investigator(s) elect to audio and/or video record interviews, all involved parties must be made aware of and consent to audio and/or video recording.

The investigation does not consider: 1) incidents not directly related to the possible violation, unless they evidence a pattern; 2) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, 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, 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.

While respecting the limitations above, character witnesses or evidence may be offered. The investigation and hearing will determine if the character evidence is relevant. If so, it may be considered. If not, it will be excluded.

Ten (10) days prior to the completion of the investigative report, the Parties will have an opportunity to review all evidence and submit a written statement to Investigator. The Investigator shall consider these statements in his/her investigation report.

The Investigator is prohibited from making any determination of responsibility.

M. Referral to a Decision-maker

If the complaint is not resolved through Informal Resolution, and after the final investigation report is shared with the parties, the Title IX Coordinator will refer the matter to a Decision-maker to make a determination regarding responsibility. The Decision-maker cannot make a determination regarding responsibility prior to ten (10) school days from the conclusion of the investigation, when the final investigation report is transmitted to the parties and the Decision-maker, unless all parties and the Decision-maker agree to an expedited timeline. Unless otherwise agreed to, the Parties will have an opportunity to submit a written statement to the Decision-maker. The Paul Cuffee School will designate a single Decision-maker from the Pool, at the discretion of the Title IX Coordinator, and inform the Parties/Advisors.

N. Evidentiary Consideration By the Decision-Maker

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Any evidence that the Decision-maker(s) determine(s) is relevant and credible may be considered. The Decision-maker will not consider: 1) incidents not directly related to the possible violation, unless they evidence a pattern; 2) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, 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, 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.

Previous disciplinary action of any kind involving the Respondent may be considered in determining an appropriate sanction upon a determination of responsibility. This information is only considered at the sanction stage of the process and is not shared with the Decision-maker until then.

The parties may each submit a written impact statement for the consideration of the Decision maker(s) at the sanction stage of the process when a determination of responsibility is reached.

The Decision-maker determines, based on the preponderance of the evidence, whether it is more likely than not that the Respondent violated the Policy as alleged.

The Decision-maker will facilitate the exchange of written questions between the parties and direct any written questions to any witnesses before a final determination is made. Each party will have the opportunity to submit relevant written questions to the other party and any witnesses. Upon receipt of any responses to those questions, the parties will have an opportunity to submit limited and relevant follow up questions in writing.

O. Deliberation, Decision-making, and Standard of Proof

The Decision-maker(s) will then deliberate to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question.

When there is a finding of responsibility on one or more of the allegations, the Title IX Coordinator will determine appropriate sanction(s).

P. Notice of Outcome

The Notice of Outcome will then be shared with the parties simultaneously. Notification will be made in writing and may be delivered by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official Paul Cuffee School records, or emailed to the parties' Paul Cuffee School-issued email or otherwise approved account. The Notice of Outcome shall 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;
- (3) Findings of fact supporting the determination;
- (4) Conclusions regarding the application of the Paul Cuffee School's code of conduct to the facts

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- (5) A statement of a rationale and the result of each allegation, including a determination regarding responsibility, any disciplinary sanctions the Paul Cuffee School imposes on the Respondent, and whether remedies designed to restore or preserve equal access to the Paul Cuffee School's education program or activity will be provided by the Paul Cuffee School to the Complainant; and
- (6) The Paul Cuffee School's procedures and permissible bases for the Complainant and Respondent to appeal.

Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

Q. Disciplinary Sanctions

Students:

Disciplinary sanctions for any violation of this Policy may include, but are not limited to, loss of privilege to participate in extracurricular activities including school social events; loss of school bus transportation; assignment of additional school work or community service; and, depending on the extent of involvement in the prohibited activity, suspension or removal from school campus.

Employees:

Disciplinary sanctions for any violation of this Policy may include, but are not

limited to, suspension, termination, or filing of criminal charges as warranted.

Volunteers/Parents

Disciplinary sanctions for any violation of this Policy may include, but are not limited to, denial of access to school premises, school-related events, or school sponsored events; suspension or termination of volunteer activities; or filing of criminal charges as warranted.

R. Confidentiality

Investigations of discrimination, including harassment, shall be conducted in such a manner as to disclose information only to those who need to know and as necessary to gain information pertinent to the investigation. Please note, some level of disclosure may be necessary in the course of conducting interviews in connection with investigations of any complaint under this policy. The Paul Cuffee School shall endeavor to keep such information as confidential as it can without compromising the thoroughness of the investigation.

S. Appeals

An appeal of a determination regarding responsibility can be taken by either party within ten (10) day notice of the outcome. The grounds for any such appeal are the following: (1) Procedural irregularity that affected the outcome of the matter;

(2) 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; or (3) The

Title IX Coordinator, Investigator(s), or Decision-maker(s) had a conflict of interest or

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bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

Once a party has filed an appeal, the Title IX Coordinator shall notify the other party in writing and implement appeal procedures equally for both parties. See Title IX Coordinator's manual for further information on appeals procedure.

T. Enforcement Agencies

Nothing in this Policy is intended to prohibit or discourage individuals from contacting the applicable state and/or federal enforcement agencies with complaints or concerns, including but not limited to:

Office for Civil Rights
Boston Office U.S. Department of Education
5 Post Office Square
8th Floor Boston, MA 02109-3921
Tel: 617-289-0111 E-mail: OCR.Boston@ed.gov

Equal Opportunity Employment Commission (EEOC)
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203-0506
Tel: 800-669-4000 TTY: 800-669-6820

Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903
Tel: (401) 222-4600
<http://www.ride.ri.com>

U. Record Keeping

The Paul Cuffee School shall maintain for a period of seven years records of: (1) Any actions taken by Paul Cuffee School in response to a report or formal complaint of Title IX Sexual Harassment;

- (2) Each sexual harassment investigation, including any determination, sanctions imposed, and remedies provided;
- (3) Any appeal and the results therefrom;
- (4) Any informal resolution and the results therefrom; and
- (5) All material used to train Title IX Coordinators, investigators, decision makers, and any person who facilitates an informal resolution process. These trainings shall be made publicly available on the Paul Cuffee School website.

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APPENDIX A

Paul Cuffee School School Title IX Grievance Form

Today's Date

Complainant's Name(s)

Last Name First Name Middle Initial

Home address

City_State_Zip Code_ Telephone Number Email Address

Parent(s)/Guardian(s) _____

Last Name First Name Middle Initial

Parent(s)/Guardian(s) Contact information _____

Home Address

_ Phone Number Email Address

Circle One: Student Parent on Behalf of Student Employee Volunteer 1. Respondent's

Name: _____ Address (if known):

_____ Contact Information:

2. Specifics of Complaint. Describe below, including any dates of alleged discrimination, identities of alleged Respondents, and specific circumstances of alleged discrimination. Attach extra pages if necessary.

3. Witnesses. Include names, any known contact information, and brief description of each witnesses' knowledge of events. Attach extra pages if necessary.

4. Corrective Action. If you wish, please describe any corrective action you would like to see taken with regard to the alleged misconduct. Attach an extra page if necessary.

Signature of Complainant or
Parent/Guardian on Behalf of Complainant