



## ***POLICIES AND PROCEDURES FOR EQUAL EMPLOYMENT AND EDUCATIONAL OPPORTUNITY***

Students, parents, employees, applicants for positions and other third parties may not be denied the right to participate in a publically funded educational setting based on the following protected classes: race, religion, color, national origin, sex, sexual orientation, marital status, age, disability, pregnancy, ancestry, genetic information, or gender identity or expression.

If you are a STUDENT, you may not be discriminated against based on the above categories, including in the following areas:

- Admission
- Use of School Facilities
- Vocational Education
- Competitive Activities
- Student Rules, Regulations and Benefits
- Financial Assistance
- School-Sponsored Extracurricular Activities
- Enrollment in Courses
- Counseling and Guidance
- Physical Education
- Graduation Requirements
- Treatment as a Married and/or Pregnant Student
- Health Services
- Most Other Aid, Benefits or Services

If you are an EMPLOYEE, you may not be discriminated against based on the above categories, including in the following areas:

- Hiring and Promotion
- Compensation
- Job Assignments
- Leave of Absence
- Fringe Benefits
- Labor Organization
- Contracts or Professional Agreements

The purpose of this procedure is to secure, at the lowest possible administrative level, timely equitable solutions to problems which may arise concerning claims of discrimination on the above bases. If you believe that you have been discriminated against, or witnessed discrimination in regard to any of the preceding policies, you may file a grievance regarding any rights believed to have been denied or violated. A report of complaint should be made within 180 days of the alleged discrimination. Grievance Forms are available from Human Resources, Compliance Coordinators, The Director of Pupil Personnel Services, Building Principals/Administrators, and Guidance Offices. Forms may also be found on the Granby Public Schools website [www.granby.k12.ct.us](http://www.granby.k12.ct.us). If needed, assistance will be provided when filing a complaint.

Any individual who wishes to inquire or to register a complaint concerning alleged discrimination in the Granby Public Schools shall have an opportunity to bring such concerns to the attention of the Compliance Coordinator (s) who are the Human Resources Coordinator, the Title IX Coordinators, the Director of Pupil Personnel, the Building Principal/Administrator, or the Superintendent who have the authority to resolve such complaints.

- **For Student/Parent-Guardian/Employee/Applicant Complaints Involving *Alleged Discrimination on the Basis of Gender [Title IX]* Contact the following:**  
Compliance Coordinators:

**Jennifer Schoonmaker**

Kelly Lane Primary  
860.844.3041  
schoonmakerj@granby.k12.ct.us

**Heidi MacDonald**

Wells Road Intermediate  
860.844.3048  
macdonaldh@granby.k12.ct.us

**Sue Vacek**

Middle School Level  
Granby Memorial Middle  
860.844.3029  
vaceks@granby.k12.ct.us

**Christina Strain**

High School Level  
Granby Memorial High  
860.844.3014  
[strainc@granby.k12.ct.us](mailto:strainc@granby.k12.ct.us)

**Karen Walther**

Human Resources Coordinator  
Board of Education Central Office  
860.844.5264  
waltherk@granby.k12.ct.us

- **For Student/Parent-Guardian/Employee/Applicant Incidents Involving *Discrimination on the Basis of a Disability [Section 504]* Contact:**

**Aimee Martin**

Director of Pupil Personnel Services  
Granby Board of Education Central Office  
860.844.5255  
martinad@granby.k12.ct.us

- **For Employer/Employee Incidents Involving Discrimination on the Basis of all other Protected classes Contact:**

**Karen Walther**

Human Resources Coordinator  
Granby Board of Education Central Office  
860.844.5264  
waltherk@granby.k12.ct.us

- **For Student Incidents Involving Discrimination on the Basis of all other Protected classes Contact:**

**Building Principal**

While complaints are being investigated, the safety of all parties will be ensured. Once a complaint has been received, interim measures such as counseling, stay away mechanisms, and/or accommodations may be utilized. All proceedings shall be kept confidential as is appropriate and if discrimination is found, steps will be taken to promptly and effectively end the discrimination, prevent its reoccurrence, and remedy its effects. In determining if discrimination occurred, a preponderance of evidence will be used. All parties will be notified of the outcome of the investigation subject to the District's legal responsibilities to comply with the Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. § 1232g. Evidence of reprisal or retaliation against any party shall be viewed as an infraction of the policy and will not be tolerated.

In compliance with regulations of Title VI, Title VII of the Civil Rights Act of 1964, Title IX of Education Amendments of 1972 and Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act and the Civil Rights act of 1987, the Granby Board of Education adopts the following Equal Employment Opportunity and Equal Educational Opportunity Policies.

The following grievance procedure shall be utilized by any student, parent/guardian, employee, or applicant in making a complaint or inquiry.

#### **Level I: Early Complaint Resolution [*Informal Resolution Mechanism*]**

Early Complaint Resolution allows the parties (the complainant and the individual who caused the alleged discrimination) an opportunity to resolve the alleged discrimination quickly. If both parties are willing to try this approach, and if the Compliance Coordinator(s) determines that Early Complaint Resolution is appropriate, the Compliance Coordinator will facilitate settlement discussions between the parties and work with the parties to help them understand the legal standards and possible remedies. The Compliance Coordinator(s) will attempt to resolve the complaint within 5 school days. Any time during Early Complaint Resolution, either party can opt to move to Level II. Throughout the process, building administrator(s) will be kept apprised of developments.

Early Complaint Resolution is not appropriate in cases of sexual violence, if multiple complaints have been lodged against the same alleged discriminator, or if either party opts out of Level I in lieu of moving to Level II.

#### **Level II: Formal Complaint**

The complainant shall, within 180 days of the alleged incident, on forms provided, put the complaint in writing and file it with the Compliance Coordinator(s). The Complainant may file the complaint orally and the Coordinator will reduce it to writing. The following are the steps involved in investigating a complaint:

- 1) The Coordinator will interview the complainant and, if different, the student victim within two school days following receipt of the complaint.
- 2) If applicable, steps will be taken to protect the complainant/victim, including developing an interim safety plan, pending the final outcome of the investigation.
- 3) After gathering information from the complainant/victim, the Coordinator will inform the accused of the charges and interview the accused within two school days following receipt of the complaint.
- 4) The Coordinator will investigate and resolve the complaint within five school days if possible, but within no more than ten school days following receipt of the complaint.
- 5) During the investigation, the Coordinator is a neutral fact-finder. Techniques used during the investigation will include reviewing documentary evidence and conducting witness interviews.
- 6) The Coordinator will use the preponderance of the evidence standard to determine whether discrimination occurred.
- 7) The Coordinator will document all efforts to gather evidence and summarize the underlying evidence in an investigative report, which will include a description of relevant facts and analysis under the appropriate legal standard(s) as well as a description of the actions to remedy harm to the victim and school community, if any.
- 8) At the end of the investigation, parties will be notified of the outcome of the complaint subject to the District's legal responsibilities to comply with the Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. § 1232g. If it is found that

discrimination occurred steps will be taken to end the discrimination, prevent its reoccurrence and remedy its effects on those impacted.

- 9) In the case of harassment, appropriate steps to end discriminatory harassment will be taken. This may include separating the victim and harasser, providing counseling for the victim and/or harasser, and/or taking disciplinary action against the harasser. Strategies to eliminate any hostile environment will be identified and implemented. These steps should not penalize the victim. If needed, a final safety plan will be implemented for the victim.

### **Level III: Appeal**

Within ten school days of receiving the Coordinator's decision, either party may appeal the findings to the Superintendent. In the appeal, the party must explain why he or she believes the factual information was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied and how this would change the District's determination in the case. The Superintendent, upon receiving a written appeal, will have ten school days to resolve the appeal of the complaint.

**Granby Public Schools**  
**Discrimination Grievance Form**

Any student, parent/guardian, employee or employment applicant who feels that he/she has been discriminated against or witnessed the discrimination of another student, parent/guardian, employee, or employment applicant on the basis of race, religion, color, national origin, sex, sexual orientation, marital status, age, disability, pregnancy, ancestry, genetic information, or gender identity or expression may discuss and/or file a grievance with the assistance of one of the individuals listed below.

**Jennifer Schoonmaker**  
**Title IX Coordinator**

Kelly Lane Primary  
860.844.3041  
schoonmakerj@granby.k12.ct.us

**Heidi MacDonald**  
**Title IX Coordinator**

Wells Road Intermediate  
860.844.3048  
[macdonaldh@granby.k12.ct.us](mailto:macdonaldh@granby.k12.ct.us)

**Karen Walther**  
**Human Resources Coordinator**

Board of Education Central Office  
860.844.5264  
waltherk@granby.k12.ct.us

**Sue Vacek**  
**Title IX Coordinator**

Middle School Level  
860.844.3029  
vaceks@granby.k12.ct.us

**Christina Strain**  
**Title IX Coordinator**

High School Level  
860.844.3014  
barnetts@granby.k12.ct.us

**Aimee Martin**  
**Director Pupil Personnel Service**

Board of Education Central Office  
860.844.5255  
martinad@granby.k12.ct.us

**For a Student or Employee who believes that he or she has been discriminated against:**

**TO BE COMPLETED BY COMPLAINANT AND/OR COMPLIANCE COORDINATOR**

Name of Complainant \_\_\_\_\_

STUDENT \_\_\_\_\_ PARENT/GUARDIAN \_\_\_\_\_ EMPLOYEE \_\_\_\_\_ APPLICANT \_\_\_\_\_

HOME ADDRESS \_\_\_\_\_

PHONE \_\_\_\_\_ DATE OF CLAIM \_\_\_\_\_ DATE OF ALLEGED INCIDENT \_\_\_\_\_

Statement of Incident: *Describe the incident(s) as clearly as possible. Include when and where the incident(s) occurred, and list any witnesses present.*

This complaint is filed based on my honest belief that \_\_\_\_\_ (person who discriminated) has unlawfully discriminated against another. I hereby certify that the information I have provided in this complaint is true, correct and complete to the best of my knowledge.

Complainant Signature \_\_\_\_\_ Date \_\_\_\_\_

Please attach any additional information/documentation necessary.

SIGNATURE OF COMPLAINANT \_\_\_\_\_

SIGNATURE OF COMPLIANCE COORDINATOR \_\_\_\_\_

DATE RECEIVED \_\_\_\_\_

## TO BE COMPLETED BY COMPLIANCE COORDINATOR

### **LEVEL I: Early Complaint Resolution [*Informal Resolution Mechanism*]**

Early Complaint Resolution allows the parties (the complainant and the individual who caused the alleged discrimination) an opportunity to resolve the alleged discrimination quickly. If both parties are willing to try this approach, **and** if the Compliance Coordinator(s) determines that Early Complaint Resolution is appropriate, the Compliance Coordinator will facilitate settlement discussions between the parties and work with the parties to help them understand the legal standards and possible remedies. The Compliance Coordinator(s) will attempt to resolve the complaint within 5 school days. Any time during Early Complaint Resolution, either party can opt to move to Level II. Throughout the process, building administrator(s) will be kept apprised of developments.

**Early Complaint Resolution is not appropriate in cases of sexual violence, if multiple complaints have been lodged against the same alleged discriminator, or if either party opts out of Level I in lieu of moving to Level II.**

1. Name of person Filing this Complaint: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Home Telephone: \_\_\_\_\_ Work Telephone: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

2. Name of Person Discriminated Against (if other than person filing): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Home Telephone: \_\_\_\_\_ Work Telephone: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

3. Granby Public Schools enforces prohibiting discrimination on the basis of race, creed, color, religion, gender, gender identification or expression, national origin, age, disability, marital status, pregnancy, genetic information, or retaliation. Please indicate the basis of the complaint.

Discrimination **based on race (specify):** \_\_\_\_\_

Discrimination **based on color (specify):** \_\_\_\_\_

Discrimination **based on religion (specify):** \_\_\_\_\_

Discrimination **based on sex (specify):** \_\_\_\_\_

- Discrimination **based on gender identification or expression (specify):** \_\_\_\_\_
- Discrimination **based on national origin (specify):** \_\_\_\_\_
- Discrimination **based on age (specify):** \_\_\_\_\_
- Discrimination **based on disability (specify):** \_\_\_\_\_
- Discrimination **based on marital status (specify):** \_\_\_\_\_
- Discrimination **based on pregnancy (specify):** \_\_\_\_\_
- Discrimination **based on genetic information (specify):** \_\_\_\_\_
- Retaliation because you filed a complaint or asserted your rights (specify):** \_\_\_\_\_

4. Please describe each alleged discriminatory incident as clearly as possible. Include when and where the incident occurred, and list any witnesses present.

**Action Taken:**

\_\_\_\_\_ The investigator believes the complainant is *satisfied* with the action taken.

\_\_\_\_\_ Resolution was *unsatisfactory* and a Level II complaint was filed with Compliance Coordinator.

\_\_\_\_\_  
Signature of Compliance Coordinator(s) or Administrative Supervisor

\_\_\_\_\_  
Date

**LEVEL II** *The complainant shall, within 180 days of the alleged incident, on forms provided, put the complaint in writing and file it with the Compliance Coordinator(s). The Complainant may file the complaint orally and the Coordinator will reduce it to writing.*

- 1) The Coordinator will interview the complainant and, if different, the student victim within two school days following receipt of the complaint.
- 2) If applicable, steps will be taken to protect the complainant/victim, including developing an interim safety plan, pending the final outcome of the investigation.
- 3) After gathering information from the complainant/victim, the Coordinator will inform the accused of the charges and interview the accused within two school days following receipt of the complaint.
- 4) The Coordinator will investigate and resolve the complaint within five school days if possible, but within no more than ten school days following receipt of the complaint.
- 5) During the investigation, the Coordinator is a neutral fact-finder. Techniques used during the investigation will include reviewing documentary evidence and conducting witness interviews.
- 6) The Coordinator will use the preponderance of the evidence standard to determine whether discrimination occurred.
- 7) The Coordinator will document all efforts to gather evidence and summarize the underlying evidence in an investigative report, which will include a description of relevant facts and analysis under the appropriate legal standard(s) as well as a description of actions to remedy harm to the victim and school community, if any.
- 8) At the end of the investigation, parties will be notified of the outcome of the complaint. If it is found that discrimination occurred steps will be taken to end the discrimination, prevent its reoccurrence and remedy its effects on those impacted. In instances where it has been determined that harassment occurred [this is essentially the same thing], action will be taken to stop any harassment, prevent its recurrence, and remedy its effects on those impacted.
- 9) In the case of harassment, appropriate steps to end discriminatory harassment will be taken. This may include separating the victim and harasser, providing counseling for the victim and/or harasser, and/or taking disciplinary action against the harasser. Strategies to eliminate any hostile environment will be identified and implemented. These steps should not penalize the victim. If needed, a final safety plan will be implemented for the victim.
- 10) Within ten school days of receiving the Coordinator's decision, either party may appeal the findings to the Superintendent. In the appeal, the party must explain why he or she believes the factual information was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied and how this would change the District's determination in the case.
- 11) The Superintendent, upon receiving a written appeal, will have ten school days to resolve the appeal of the complaint.

**Action Taken:**

\_\_\_\_\_ **The investigator believes the complainant is *satisfied* with the action taken.**

\_\_\_\_\_ **Resolution was *unsatisfactory* and a Level III complaint was filed with the Superintendent.**

\_\_\_\_\_  
**Signature of Compliance Coordinator**

\_\_\_\_\_  
**Date**

**LEVEL III** Within ten school days of receiving the Coordinator’s decision, either party may appeal the findings to the Superintendent. In the appeal, the party must explain why he or she believes the factual information was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied and how this would change the District’s determination in the case. The Superintendent, upon receiving a written appeal, will have ten school days to resolve the appeal of the complaint.

**ACTION TAKEN:**

\_\_\_\_\_ The investigator believes the complainant is *satisfied* with the action taken.

\_\_\_\_\_ Resolution was *unsatisfactory* and a level IV complaint was filed with the Board of Education.

\_\_\_\_\_  
Signature of Superintendent

\_\_\_\_\_  
Date

**LEVEL IV** The Board of Education, Superintendent and the Compliance Coordinator(s) shall proceed in accordance with appropriate state statutes.

**ACTION TAKEN**

\_\_\_\_\_ The investigator(s) believe the complainant is *satisfied* with the action taken.

\_\_\_\_\_ Resolution was *unsatisfactory* and a Level V complaint was filed with \_\_\_\_\_.

\_\_\_\_\_  
Signature of BOE Designee

\_\_\_\_\_  
Date

**LEVEL V** *If the complainant wishes to pursue the grievance, he/she shall proceed in accordance with appropriate state statutes.* Contact information is as follows:

State Title IX Compliance  
Adrian R. Wood, Ph.D.  
Education Consultant, State Civil Rights Compliance Coordinator  
Turnaround Office  
Connecticut State Department of Education  
Phone: (860) 713-6795 / Fax: (860) 713-7035  
[Adrian.wood@ct.gov](mailto:Adrian.wood@ct.gov)

Boston Office of Civil Rights  
The Commission on Human Rights and Opportunities (CHRO)  
25 Sigourney Street  
Hartford, CT 06106  
860-541-3400  
[www.state.ct.us/chro/](http://www.state.ct.us/chro/)

The Commission on Human Rights and Opportunities (CHRO)  
25 Sigourney Street  
Hartford, CT 06106  
860-541-3400  
[www.state.ct.us/chro/](http://www.state.ct.us/chro/)

**Right to File a Separate Court Action**

The complainant may have the right to file suit in Federal court, regardless of the school districts findings. Granby Public Schools does not represent the complainant in case processing, so if the complainant wishes to file a court action, he or she must do so through his or her own attorney or on his or her own through the court's pro se clerk's office. If a complainant alleges discrimination prohibited by the Age Discrimination Act of 1975, a civil action in Federal court can be filed only after the complainant has exhausted administrative remedies. Administrative remedies are exhausted when either of the following has occurred: 1) 180 days have elapsed since the complainant filed the complaint with Granby Public Schools and Granby Public Schools has made no finding; or 2) Granby Public Schools issues a finding in favor of the recipient. If this occurs, Granby Public Schools will promptly notify the complainant and will provide additional information about the right to file for injunctive relief.

***Additional information may also be obtained by contacting:***

Boston Office of Civil Rights  
US Department of Education, 8<sup>th</sup> Floor  
5 Post Office Square  
Boston, MA 02109  
617-289-01111  
OCR.Boston@ed.gov  
[www.ed.gov/about/offices/list/ocr/know.html](http://www.ed.gov/about/offices/list/ocr/know.html)

State Title IX Compliance  
Adrian R. Wood, Ph.D  
Education Consultant, State Civil Rights Compliance Coordinator  
Turn Around Office  
CT State Department of Education  
Phone (860) 713-6795/Fax (860)713-7035  
[Adrian.Wood@ct.gov](mailto:Adrian.Wood@ct.gov)

The Commission on Human Rights and Opportunities (CHRO)  
25 Sigourney Street  
Hartford, CT 06106  
860-541-3400  
[www.state.ct.us/chro/](http://www.state.ct.us/chro/)