

ACADEMY OF TUCSON SCHOOLS TITLE IX POLICY AND PROCEDURES

I. Policy Statement

The Academy of Tucson Schools ("the Academy") is committed to providing a learning and working environment free from sex-based discrimination, including sexual harassment, in compliance with Title IX of the Education Amendments of 1972 (20 U.S.C. §1681 et seq.) and its implementing regulations (34 C.F.R. Part 106). The Academy strictly prohibits discrimination or harassment on the basis of sex in any educational program, activity, or employment practice.

II. Title IX Coordinator

The Academy has designated the following individual to serve as the Title IX Coordinator:

Name/Title: Karen HancockAddress: 10720 E. 22nd Street

• Phone: 520-733-0096

• Email: khancock@aoths.net

The Title IX Coordinator is responsible for coordinating the Academy's compliance with Title IX, including overseeing complaints of sexual harassment and implementing grievance procedures.

III. Scope of Policy

This policy applies to all students, employees, applicants, and third parties participating in or seeking to participate in the Academy's education programs or activities. The Academy's education programs and activities include all operations, locations, events, and circumstances over which the Academy exercises substantial control.

IV. Definitions

- 1. **Sexual Harassment** Conduct on the basis of sex that satisfies one or more of the following:
 - An employee of the Academy conditioning the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct;
 - Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it denies a person equal access to the Academy's education program or activity;
 - Sexual assault, dating violence, domestic violence, or stalking as defined under federal law.
- 2. **Complainant** An individual alleged to be the victim of sexual harassment.
- 3. **Respondent** An individual alleged to be the perpetrator of sexual harassment.

4. **Formal Complaint** – A document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment and requesting an investigation.

V. Reporting

Any individual may report sexual harassment to the Title IX Coordinator using the contact information listed above. Reports may be made at any time, including during non-business hours, by mail, email, or phone.

In addition, employees designated as "mandatory reporters" must immediately forward any report of sexual harassment to the Title IX Coordinator.

VI. Response to Reports

Upon receipt of a report, the Title IX Coordinator will:

- Promptly contact the complainant to discuss the availability of supportive measures;
- Explain the process for filing a formal complaint;
- Provide written notice to both parties if a formal complaint is filed.

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available to restore or preserve equal access.

VII. Grievance Procedure

The Academy will follow a fair, impartial grievance process that includes:

- 1. Written notice of allegations to both parties;
- 2. An opportunity for both parties to present evidence and witnesses;
- 3. An objective evaluation of all evidence;
- 4. No conflicts of interest or bias by decision-makers:
- 5. Live hearings or equivalent procedures, where applicable;
- 6. A written determination regarding responsibility;
- 7. An appeals process available to both parties.

VIII. Confidentiality

The Academy will keep confidential the identity of any complainant, respondent, or witness, except as required to carry out Title IX obligations or as permitted by law.

IX. Retaliation

Retaliation against any individual for reporting sexual harassment, participating in a proceeding, or exercising Title IX rights is strictly prohibited.

X. Training

The Academy will provide Title IX training to the Title IX Coordinator, investigators, decision-makers, and all staff with reporting obligations. Training materials will be publicly available on the Academy's website.

XI. Recordkeeping

The Academy will maintain records of:

- Sexual harassment investigations, determinations, and appeals;
- Supportive measures provided;
- Training materials.

Records will be kept for a minimum of seven (7) years.

XII. Dissemination of Policy

This policy will be distributed annually to students, employees, parents/guardians, and will be posted on the Academy's website. The contact information for the Title IX Coordinator will be prominently displayed.

Adoption and Review

This policy was adopted by the Governing Board of the Academy of Tucson Schools on December 1st, 2025. It will be reviewed annually and revised as necessary to remain compliant with federal and state law.