

Ninnekah Public Schools

Title IX Presentation

Robyn Morse, Interim Superintendent

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NPS Corrective Action Plan



NINNEKAH PUBLIC SCHOOLS
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Rubyn Morse, Interim Superintendent

Date: 11-30-21

Comprehensive Corrective Action Plan

Area 1: Commitment by its school board, superintendent, and school leaders to fully meet the requirements of Title IX provisions and to do so in a transparent manner.

- All NPS staff as well as the school board will be trained in Title IX protection trainings. Please see the timeline attached for these specific dates.
 - Boarder Corey is facilitating the Board Training and those training materials will be made available on the website as soon as the training is completed.
 - December 13, 2021, all staff will be trained by Elizabeth Hudson, NPS with the Oklahoma State Department of Education. Numerous training sessions are being held this school year and we will continue to implement training for future school sessions for all staff.
 - Elementary students are currently being trained with the ROAD program. That training was done previously by the CARE center of Oklahoma City. The DOE is doing a presentation for middle school and high school students.
 - Continuing training is being developed by NPS and the CARE center for some time in March 2022.
 - New Teacher Onboard Training is in the development stages and plans are to have it ready for all new teachers coming into NPS for the 22-23 school year.
- Board Policies are currently being revised and updated and approved by the board of education monthly. Please see the timeline attached. This process will remain on-going as needed. The policies we are currently working on are:
 - Abuse, Neglect, Exploitation and Trafficking: new policy
 - Discrimination, Harassment, Kinkification: new policy
 - Federal Program Compliance Resolution: new policy
 - Sexual Harassment - Employee: update
 - Sexual Harassment - Student: update

Area 2: Improvement of NPS climate and culture to ensure student safety, protect students' rights, and prevent future incidents.

- Create a community survey to gather feedback from stakeholders regarding the efforts on improving NPS District Title IX compliance efforts. See attached timeline.
- Introduce and implement the STOPs program to the community. This will include a parent letter, website information and the program on all of the district's staff and student technology equipment. Administrative training for the STOPs program will be included in this step. See attached timeline.
- Monthly Board reports as stated previously in Item 1.
- NPS hired an additional school counselor to provide more social and emotional support for students in need. He has 23 years' experience and is working 10 hours a week doing both individual and group counseling sessions.
- Paragraphs are being developed with student age appropriate information and Title IX updates. Paragraphs will be available at the open house, school website and given to the back to school packet. See attached timeline.

- Title IX Coordinator job description and a Title IX Rules and Responsibilities Chart are currently being developed. Once completed, these will be Board approved and then posted on the district website. See attached timeline.
- We are partnering with STOPS Solutions, a service funded by OSG. STOPS will guide NPS in identifying and helping at-risk individuals, build and sustain a prevention-driven culture, and extend our staff's capacity using their team's resources and capabilities. They do this by providing safety technology, wellness training, and dedicated operators. This will allow staff, students and community to report bullying, hazing, violence and inappropriate behavior both on and off-campus, then send a report to people that care and are ready to help. See attached timeline.
- NPS will start in December 2021 with a monthly board update item, Title IX Compliance Report Updates, at each regular monthly board meeting. This update will be given by our Title IX team and will be available on the district website and in the official board minutes. See attached timeline.
- NPS will continue to doing as many significant background checks as possible, such as clearing background checks and calling previous employers.
- NPS will survey staff and community on an on-going basis. These survey results will be available on the district website and presented to the board in the updates. See attached timeline.

Area 3: Legal compliance in the implementation of Title IX requirements.

- NPS Title IX Team was developed in August 2021, including a Coordinator, Investigator and District Decision Maker. A District Appeal Decision Maker has recently been added to the Team. The Title IX Investigation Steps from OCSDE have been implemented in the Title IX procedures for the district. See attached checklist.
- NPS developed and distributed Title IX posters and Flyers throughout the district, including the school website, locker rooms, restrooms, hallway, offices, lobby and entryways. See attached poster.
- NPS has added a tab in the front page of the district website "School Safety and Mental Health". Under that tab is the Title IX option with Board Policies, Title IX contact information, a Title IX department description, the NPS student reporting form and the Title IX training information. Future plans are to include monthly student newsletters, STOPS information, Title IX department and responsibilities, investigation steps, and appropriate paragraphs as well as the monthly school board updates. See attached timeline.
- Conduct Community Hearings after the implementation of the STOPS program to gather data for qualitative and quantitative measures. These surveys will be anonymous and will provide statistics on different student issues.
- Back to School Title IX student presentation. The NPS Title IX Team will develop and implement a student friendly presentation to student students on what Title IX is and how to deal with it appropriately. See attached timeline.

NPS Correction Plan Timeline



NINNEHAH CORRECTIVE ACTION PLAN TIMELINE

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1. July 2021, proposed Title IX Coordinator and Title IX Investigator meeting with the State Department of Education Title IX team.
2. Beginning of the School Year 21-22, administrators attended Title IX Coordinator and Investigator training with the State Department of Education.
3. Beginning of the School Year 21-22, designated a Title IX Coordinator with full intention that the coordinator shall become fully familiar with his/her responsibilities in accordance with a schedule that shall be set and communicated with the Board. The Coordinator shall not be the Athletic Director, Superintendent or any similarly situated person.
4. August 2021, Title IX Team members reviewed Title IX Regulations Addressing Sexual Harassment (OCR Webinars), Summary of Major Provisions of the Department of Education Title IX Final Rule (www2.ed.gov), and Responsibility & Authority of a Title IX Coordinator ([Engage.ok.gov](http://engage.ok.gov))
5. August 2021 Inservice for all staff, Title IX training presented by the State Department of Education.
6. August board meeting 2021, Board approved Title IX Team members (coordinator, investigator, and district final decision maker).
7. August board meeting 2021 revised and updated the board policy FB-Sexual Harassment of Students.
8. August 2021, staff reviewed Title IX policy and Team member contacts. As well as how to file a report.
9. September 2021, all staff completed Global Compliance Network Training, including Title IX, Child Abuse, Sexual Harassment, Suicide Prevention (site.gcntraining.com)
10. September 2021, Title IX Coordinator attended Title IX Training at Alex Public Schools presented by the State Department of Education.
11. September 2021, Title IX Team created Title IX posters with updated contact information and posted across campus and updated the school website.
12. September 2021, Title IX Team addressed the Board about upcoming training and programs to be implemented to ensure staff and student knowledge of Title IX coverage and contacts.
13. September 2021, Interim Superintendent, Ninnehah Board Members and Title IX Coordinator addressed the Oklahoma State Board of Education of revised policies of Ninnehah School District. Providing the State Superintendent and State Board Members copies of updated board policy, posted information of Title IX Team members and contact information, updated handbooks to include Title IX Team contact information, as well as training that had been conducted for all Ninnehah Staff.
14. October 2021, presentation of the ROAR program for grades PK-4th as part of the required curriculum for promoting awareness of sexual harassment and procedure to file a complaint or notifying staff of complaint. ROAR is a grade appropriate program geared



NINNEHAH CORRECTIVE ACTION PLAN TIMELINE

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- toward body awareness and identification of trusted adults for younger students. Information was presented by the CARE Center of Oklahoma City.
15. October 2021, Title IX Team Members and Elementary Teachers attended professional development over Recognizing and Reporting of Child Abuse presented by the CARE Center of Oklahoma City.
16. November 2021, Interim Superintendent and Title IX Team members received and began preparing the first quarterly report due to the Oklahoma State Department of Education per Ninnehah Schools Accreditation Probation requirements.
17. November 2021, ZOOM conference with Oklahoma State Department of Education about future training for district and middle school & high school students concerning Title IX Sexual Harassment. Date set for December 17, 2021 for district staff training.
18. December 2021, employed an additional counselor for the district to provide more social and emotional support for students and accessibility to on sight counselors when needed.
19. December 2021, First quarterly report due to the Oklahoma State Board of Education
20. December 2021, Implementation of the STOP IT program, anonymous reporting program that provides support for students when needed in areas covered by Title IX. Program will be installed on all student chromebooks, available on the website, and poster information placed in various locations across the campus. The program will provide monthly data for the district to analyze.
21. December 2021, monthly board agenda item for the Title IX compliance report to be given by the Title IX Team. Development of student advisory council to gain student feedback and input for district issues such as Title IX compliance.
22. December 2021, District Training with the State Department of Education in regards to Title IX recognition and reporting (Elizabeth Suddath, MPH) will schedule future dates for student sessions.
23. December 2021, OSSBA Training for Ninnehah Board Members covering Title IX Requirements (December 16, 2021).
24. January 2022, Title IX monthly emails to staff and student newsletter providing information of Title IX updates.
25. January 2022, updating board policy of Abuse, neglect, exploitation and trafficking, sexual harassment-employees, and federal programs complain resolution, Title IX Coordinator job description, and Title IX Team members role and responsibilities.
26. January 2022, revising school website with updated board policies, training, and Title IX investigation steps.
27. February 2022, State Department of Education (Elizabeth Suddath) presentation for Middle School and High School Students during Teen Dating Violence Awareness Month and discuss Title IX updates.
28. March 2022, Community and staff training on recognizing and reporting abuse, and neglect. Provided by the CARE Center of Oklahoma City.
29. March 2022, community survey to provide the district feedback on the implementation of Title IX procedures, district training, access to contact information and complaint forms.



NINNEHAH CORRECTIVE ACTION PLAN TIMELINE

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30. April 2022, development of New Hire Packets for new employees concerning Title IX policy and procedures for the 2022-2023 school year. Development of a student friendly powerpoint presentation to educate students of Title IX and procedures to ensure Students are aware of their rights and steps if needed to file a complaint.
31. April 2022, development of student age appropriate pamphlets with Title IX updates and information. Pamphlets will be available across the district, on the school website as well as distributed to all students and parents during open house and back to school nights at the beginning of the 2022-2023 school year



Ninnekah Public Schools

Home of the Owls

Enrollment 2021-2022

Student Transfer Policy

School Safety & Mental Health



☰ MAIN MENU

ENGLISH ▼

NINNEKAH PUBLIC SCHOOLS // SCHOOL SAFETY & MENTAL HEALTH // TITLE IX

Title IX

Report and stop Bullying, Sexual Harassment, Discrimination or other unsafe behaviors

- [STOPit Parent Letter](#)
- [STOPit Information](#)
- [Report Incident](#)

STOPit Parent Letter

- [STOPit Parent Letter](#)

Reporting Abuse

- [Child Abuse Hotline Poster](#)
- [Title IX Contact Poster](#)
- [ROAR Poster](#)
- [NPS Student Reporting Form](#)

Title IX Policies

- [Title IX Ninnekah Board Policy on Sexual Harassment of Students](#)
- [Ninnekah Sexual Harassment Policy - Employees](#)
- [Abuse, Neglect, Exploitation and Trafficking Policy](#)
- [Federal Programs Complaint Resolution Policy](#)



Title IX Policies

- [Title IX Ninnekah Board Policy on Sexual Harassment of Students](#)
- [Ninnekah Sexual Harassment Policy - Employees](#)
- [Abuse, Neglect, Exploitation and Trafficking Policy](#)
- [Federal Programs Complaint Resolution Policy](#)
- [Investigation Report on the Administration of Federal Program Activities](#)
- [NPS Corrective Action Plan](#)
- [NPS Corrective Action Plan Timeline \(revised 3/2022\)](#)

Title IX Resources & Information

- [Title IX Contact Poster](#)
- [Title IX Professional Development \(revised 3/23/2022\)](#)
- [Title IX ppt](#)
- [Roles and Responsibilities](#)
- [Title IX Investigation Steps](#)
- [STOPit Parent Video](#)
- [STOPit Parent FAQ](#)

Title IX Student Information

- [Ninnekah Student Newsletter](#)
- [STOPit for Students Flyer](#)
- [STOPit Student Video](#)
- [9 Things to Know About Title IX](#)
- [NPS Student Reporting Form](#)

NPS School Policies and Procedures

NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS	
<p>The policy of this school district forbids discrimination against, or harassment of any student on the basis of sex. The Ninneka Board of Education will not tolerate sexual harassment by any of its employees or students. This policy applies to all students and employees regardless of race, ethnicity, gender, sexual orientation, or marital status. It is the policy of this school district to provide a safe and supportive learning environment for all students.</p> <p>1. Sexual harassment is defined as conduct on the basis of sex that satisfies one or more of the following:</p> <ul style="list-style-type: none"> A. An employee of the school district conditioning the provision of an act, benefit, or service of the school district on a student's participation in unlawful sexual conduct. This is referred to as <i>quid pro quo</i> sexual harassment. B. Unlawful sexual conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a student equal access to the school district's educational program or activity. C. Sexual assault, dating violence, domestic violence or stalking as defined by federal law. <p>For the purpose of this policy, examples of sexual harassment include, but are not limited to:</p> <ul style="list-style-type: none"> Verbal or physical sexual gestures, including vulgar gestures for sexual activity, flirting, physical contact for sexual (sexual and nonsexual) contact, "sexual" remarks, innuendos, and jokes. Displaying comments about a girl's ability to excel in a class inherently considered a "sexy" subject, primarily talking to a student about sexual matters, flouting or flouting a student inappropriately, may constitute sexual harassment. <p>Writing graffiti that names a student or otherwise identifies a student is potentially abusive and constitutes sexual harassment. Conduct of any kind will not be tolerated on school property. The school district is committed to making every effort to ensure a safe and supportive learning environment. Use of email, text, instant, or electronic may constitute sexual harassment as much as use of in-person, print, mail, handwriting or other communication.</p> <p>Any of the aforementioned conduct that effectively deprives a student of equal access to educational opportunities or benefits provided by the school.</p> <p>2. Specific Prohibitions</p> <ul style="list-style-type: none"> A. Administrators and Supervisors B. It is sexual harassment for an administrator, supervisor, support personnel, or teacher to use the or her authority to solicit sexual favors or attention from students. C. Administrators, supervisors, support personnel, or teachers who either engage in sexual harassment or tolerate such conduct by other employees shall be subject to discipline. 	
Adoption Date: August 18, 2017	Revision Date(s): Page 1 of 4

NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>A. Equitable Treatment. Both the alleged victim (complainant) and the alleged respondent (respondent) will be treated equitably by the school district.</p> <p>3. Objective Evaluation of Evidence. All evidence both incriminating and exonerating will be included objectively. Credible observations will not be made based upon the party's status as complainant or respondent.</p> <p>C. Conflict of Interest. Any person serving as the Title IX coordinator, investigator, decision-maker, or any person engaged in the grievance process shall not have a conflict of interest against complainants and respondents generally or against the particular complainant and respondent.</p> <p>D. Presumption. There will be a presumption that the respondent is not responsible for the alleged conduct until a determination is made at the conclusion of the grievance process.</p> <p>E. Timeliness. The grievance process will proceed in a timely manner. Any delay in the process for good cause such as the unavailability of a complainant, absence of a party, witness or other information, or a delay in the process, and written notice provided to both parties explaining the reason for the delay.</p> <p>F. Proportionate Response. A determination of the responsibility of the complainant and respondent that may be implemented following a determination of responsibility must be provided to both parties.</p> <p>G. Standard of Review. The school district will utilize a preponderance of the evidence standard) or a clear and convincing evidence standard) in determining responsibility. The standard selected by the school district will meet to be the same standard that is applied to all formal complaints involving these alleged employees.</p> <p>H. Privileged Information. The school district will not require, allow or use evidence or questions that constitute a seek legally privileged information, unless the privilege is waived.</p> <p>I. Written Notice. Upon receipt of a formal complaint, the school district will provide written notice to all those parties in sufficient time to give the respondent time to prepare a response before an initial interview. The written notice must include:</p> <ul style="list-style-type: none"> A. Notice of the grievance process, including any informal resolution process. B. Notice of the allegations, including sufficient details to allow the respondent to prepare a response. C. A statement that the respondent is presumed not responsible for the conduct and that responsibility will be determined at the conclusion of the grievance process. 	
Adoption Date: August 18, 2017	Revision Date(s): Page 2 of 4

NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>3. The "off-duty" conduct of school personnel that has or will have a negative impact on the educational process of the school or constitutes an illegal or inappropriate relationship. A student may subject the employee to disciplinary action which could include termination of employment. Any harassment or sexual abuse between school personnel and students, including students who have reached the age of majority (18), during school hours will be treated as sexual harassment. Such violations may result in suspension of the student and suspension of the employee for the employee. Any sexual offense between teachers and students, under the age of 20 constitutes a crime under Oklahoma law and will most likely result in the suspension or expulsion by the State of Oklahoma.</p> <p>5. Notice of this policy and grievance procedures, including how to file or report sexual harassment and how the district will respond, shall be provided to applicants for admission, new employees, students, parents or legal guardians, and unions or professional organizations holding agreements with the school district.</p> <p>6. Reporting Allegations of Sexual Harassment</p> <ul style="list-style-type: none"> A. It is the express policy of the board of education to encourage student victims of sexual harassment to come forward with such claims. B. Students who feel that administrators, teachers, support personnel, teachers, or other students are subjecting them to sexual harassment are encouraged to report these conditions. If a student reports sexual harassment, the school administrator or supervisor will investigate the complaint. If the school administrator or supervisor is the alleged offender, the report will be made to the next higher level of administration or supervision or to any responsible adult in the school district. The report may include all procedures of the grievance process in the Title IX coordinator. The Title IX coordinator should provide the appropriate personnel to the student or parent/guardian so that the student (complainant) may be a formal complaint with the Title IX coordinator by email or in person or as directed by the Title IX coordinator. C. Every attempt will be made to maintain confidentiality; however, absolute confidentiality cannot be guaranteed because of due process concerns that arise in sexual harassment investigations. Any request or request will be allowed to occur as a result of the good cause (reporting or a sample of sexual harassment). D. Upon notice from an employee that a student or parent/guardian has reported possible sexual harassment, the Title IX coordinator will investigate the complaint and determine the availability of appropriate measures, consider the student's wishes with regard to supportive measures, and assist the process that will be conducted with a formal complaint. <p>7. Grievance Procedures.</p>	
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NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>D. Notice of the parties' right to have an advisor and to inspect and review evidence. The advisor may not be required to be an attorney.</p> <p>E. Notice of any provision in the student discipline code that prohibits knowingly making false statements or providing false information in the grievance process.</p>	
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NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>If in the course of an investigation, the school district obtains additional information about the respondent or complainant that was not included in the original written notice, notice of the additional allegations must be provided in writing to both parties.</p> <p>7. Investigation of the Allegations. The school district will designate an investigator to conduct a thorough investigation of allegations. Content information for the investigator will be provided to both the complainant and the respondent.</p> <p>A. The burden of proof and gathering evidence remains on the school district.</p> <p>B. An equal opportunity will be provided to both parties to present witnesses and evidence during the investigation.</p> <p>C. Neither the complainant or respondent will be prohibited from discussing the allegations or gathering and presenting evidence to the investigator.</p> <p>D. Both parties will have the opportunity to have others present during interviews or related proceedings. This may include an advisor who may but is not required to be an attorney.</p> <p>E. Written notice of the date, time, participants, purpose and location of any investigator interview, hearing, or other meeting shall be provided to the party who is invited or expected to attend.</p> <p>F. Both parties and their advisors, if any, will be provided an opportunity to review all evidence that is directly related to the allegations in the formal complaint. This must include any evidence on which the school district does not intend to rely and any disciplinary or non-disciplinary evidence on their own record. Such evidence must be provided prior to the completion of the final investigation report and in time to give the parties at least ten (10) days to prepare a written response, which the investigator must consider prior to completing the investigation report.</p> <p>G. A written investigation report will be provided that summarizes the relevant evidence. This report will be provided to the parties and their advisors, if any, for their review and written responses at least ten (10) days before a hearing or determination of responsibility.</p> <p>8. Hearing. The Title IX coordinator will determine whether a live hearing is necessary on a case-by-case basis if both parties request or consent to such a hearing (the hearing component is optional for K-12 schools). Regardless of whether a live hearing is held, or a written hearing is conducted, each party will have ten (10) days from the receipt of the investigation report to submit written, relevant questions that the party wants asked of another party or witness. Both parties will be provided with the answers and follow up questions. Failure to file questions when questions regarding a complainant's prior sexual behavior or sexual predisposition are considered relevant in a hearing provided by a school district.</p> <p>9. Determination of Responsibility. A decisionmaker, who is not the Title IX coordinator or the investigator, will make a determination of the evidence reported or to other and concerning evidence identified in the investigation report, and will issue a written determination of responsibility that:</p> <p>A. Identifies the allegations that potentially constitute sexual harassment;</p>	
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NINNEKAH BOARD OF EDUCATION	FB
<p>The district will also post the training materials used to train Title IX coordinators, investigators, and decisionmakers on the district website at: https://www.ninneka.k12.or.us. These materials will also be available to the public.</p> <p>12. Retaliation. The board of education prohibits retaliation by the school district or any employee of the school district against any person for the purpose of interfering with Title IX rights or because the person has participated or</p>	
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NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>B. Describe the school district's procedural steps taken from the receipt of the complaint to the determination.</p> <p>C. Includes findings of fact to support the determination.</p> <p>D. Includes resolution regarding application of the discipline code to the facts.</p> <p>E. Includes a statement of, and rationale for, the result as to each allegation, including a determination of responsibility, any disciplinary sanctions, and whether remedies to restore or preserve equal access to the school's educational programs or activities will be provided to the complainant, and</p> <p>F. The procedures and permissible basis for appeals.</p> <p>10. Appeal. Within ten (10) days of a determination of responsibility, dismissal of a complaint or any allegations therein either party may appeal for one of the following reasons:</p> <p>A. A procedural error affected the outcome.</p> <p>B. New evidence that was not reasonably available at the time of the determination and could affect the outcome.</p> <p>C. Conflicts of interest on the part of the Title IX coordinator, investigator or decision maker that affected the outcome.</p> <p>If an appeal is made, the school district will provide written notice to both parties of the appeal. Both parties will be provided an equal opportunity to submit a written statement in support of or challenging the determination within ten (10) days of the written notice to both parties of the appeal being filed. The appeal will be heard by an appeal decision maker who is not the Title IX coordinator, the investigator or the original decisionmaker. The appeal decisionmaker cannot have a conflict of interest or bias against complainants and respondents generally or the particular complainant and respondent. The appeal decisionmaker will receive training as mandated by law. The decision of the appeal decisionmaker will be final and nonappealable. The written decision of the appeal decisionmaker will be provided within ten (10) days of the deadline for written statements supporting or challenging the initial determination. The written decision will be provided simultaneously to both parties.</p> <p>11. Recordkeeping. The school district will keep records related to reports of alleged sexual harassment for a minimum of seven (7) years. Records maintained will include investigation records, disciplinary sanctions, remedies, appeals, and records of any action taken including supportive measures. Records will document in each instance that the school district's response was not indifferent and that measures were taken to restore or preserve equal access to educational programs or activities. If the school does not offer supportive measures in response to a report, the records should document why the response was not clearly unreasonable under the known circumstances.</p>	
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NINNEKAH BOARD OF EDUCATION	FB
SEXUAL HARASSMENT OF STUDENTS (Cont.)	
<p>refused to participate in any manner in a proceeding under Title IX regulations. Complaints of retaliation will be addressed under the district's grievance process.</p> <p>Charging a person with a discipline violation in retaliation of conduct violation based on a person's knowingly making a materially false statement in bad faith in an investigation is not retaliation.</p> <p>REFERENCE: Title VII of the Civil Rights Act of 1964 42 U.S.C. §2000e-6 20 C.F.R. §101.11, et seq. U.S. Department of Education, OCR, Title IX Regulations Addressing Sexual Harassment.</p>	
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Title IX Team

Ninnekah Public Schools

Regina Jones- Title IX Coordinator
Elementary Principal

Trevor Lee- Title IX Investigator
HS Teacher

Deborah Fulton- Title IX Decision Maker
Elementary Teacher

Robyn Morse- Title IX District Appeal
Interim Superintendent

Ninnekah Public Schools

Title IX Professional Development

- *Ninnekah School Board Training-OSSBA

- *Ninnekah Title IX Team-OK State Dept of Educ. & OSSBA

- *Ninnekah Staff-GCN Training, State Dept of Educ. & the CARE Center

- *Ninnekah Students-OK State Dept of Educ. & Ninnekah Title IX Team

Ninnekah Public Schools

Title IX Investigation Steps

TITLE IX INVESTIGATION STEPS

- ☐ **Actual Notice:** If any employee of the district has notice of conduct that may violate Title IX's prohibition against sexual harassment, report it to the Title IX coordinator and building principal.
- ☐ **Initial Discussion/Supportive Measures:** Title IX coordinator contacts the complainant (i.e., the individual alleged to be the victim of harassment) and:
 - ☐ a. offers supportive measures, and
 - ☐ b. Explains how to file a formal complaint.
 - ☐ c. Document what supportive measures were taken or denial of supportive measures by parents.
- ☐ **Law Enforcement/DHS/State Dept. of Education Referral:** Does the allegation require a law enforcement, DHS referral and/or State Department of Education report?
- ☐ **Formal Complaint:** To proceed under Title IX, a formal complaint must be submitted by the complainant or the Title IX Coordinator. If no formal complaint, proceed under a different aspect of the student code of conduct. (The Title IX coordinator may proceed with filing the formal complaint.)
- ☐ **Supportive Measures:** The Title IX Coordinator determines whether supportive measures are necessary for both parties.
- ☐ **Jurisdictional Determination:** Determine whether the district has jurisdiction over the subject matter, the people, and the place, event or activity at which the conduct allegedly occurred.
- ☐ **Assign Investigator:** If the district has jurisdiction, assign an employee to investigate the Allegations.
- ☐ **Informal Resolution:** If the district offers an informal resolution process, determine whether it is appropriate in the matter being investigated. (Informal resolution is not appropriate if the respondent is an employee of the district.)
- ☐ **Notice to Parties:** Provide written notice to parties that meets the requirements of 34 C.F.R. 106.45(b)(2).
- ☐ **Emergency Removal:** Before an emergency removal, the district must perform an individualized risk analysis, determine that an immediate threat to the health or safety of students or employees justifies removal, and provide the respondent with notice and an opportunity to challenge the decision immediately following removal.
- ☐ **Notice of Interviews:** Provide notice of interviews that provides the date, time, place, and Purpose.
- ☐ **Interviews:** Interview the complainant and respondent, and any witnesses that may have relevant information to contribute.
- ☐ **Evidence:** Obtain any evidence that will help the district make a determination (e.g., text messages, emails, social media posts, surveillance video, medical documentation, etc.). This should begin after notice of the possible conduct and continue throughout the investigation.
- ☐ **Opportunity to Inspect:** Prior to completion of the investigatory report, provide all evidence directly related to the allegation(s) to both parties and their advisors in electronic or hard copy format, and allow both parties ten (10) days to provide a written response. These responses must be considered before finalizing the investigatory report.
- ☐ **Report:** Write a report that contains all relevant evidence and analyzes the issues under investigation. Witness statements, interview notes and other evidence should be attached as exhibits.
- ☐ **Submit Report to Parties:** The report must be submitted to the parties and their advisors, and they must be given at least ten (10) days to review and provide written responses. Review the responses and determine whether any aspect of the responses should be added to the report.
- ☐ **Submit Report to Decision-Maker:** The final report must be submitted to the decision-maker.
- ☐ **Live Hearing (optional):** Determine whether a live hearing should be held.
- ☐ **Follow-up Questions:** With or without a live hearing, the decision maker must ask each party and any witnesses any relevant questions and follow-up questions, including that challenging credibility, that a party wants asked of any party or witnesses.
 - a. Afford each party the opportunity to submit written questions;
 - b. Provide each party with the answers; and
 - c. Allow for additional, limited follow-up questions from each party.
- ☐ **Outcome Letter:** Send a written notice of the determination, that complies with 34 C.F.R. 106.45(b)(7), to both parties.
- ☐ **Appeal:** Ensure that the parties are aware of their rights to appeal the final determination. If an appeal is filed, follow the steps in district policy.

ROAR! Program

Ninnekah Elementary School



Ninnekah Public Schools

StopIt! Program Anonymous Reporting Tool

STOPit APP

Access Code for Ninnekah
Schools:
npsowls1

Anonymous Reporting Tool



Making a Report:

Report Anonymously on
Stopit App

Notify member of Title IX Team
Contact Parents or a Trusted
Adult

Contact Teacher or Counselor
Contact Administration

Fill out a Student Report Form
Available in building offices
or School Website
ninnekah.k12.ok.us

Title IX

Issues Covered

Sex Discrimination

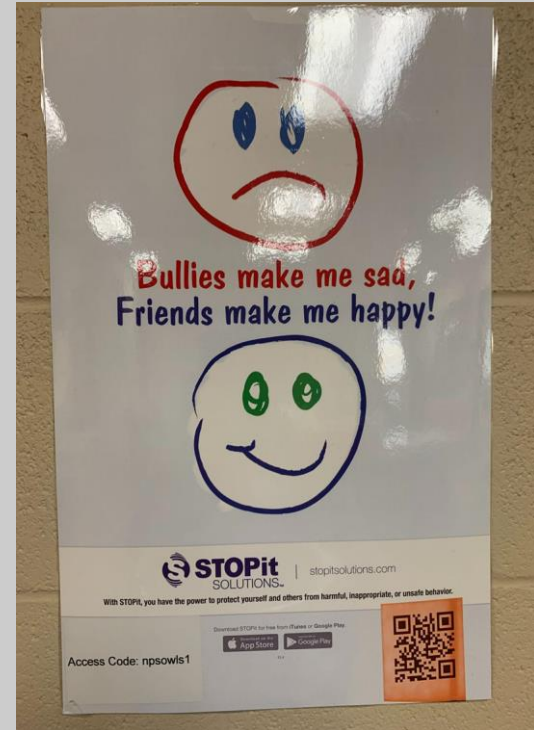
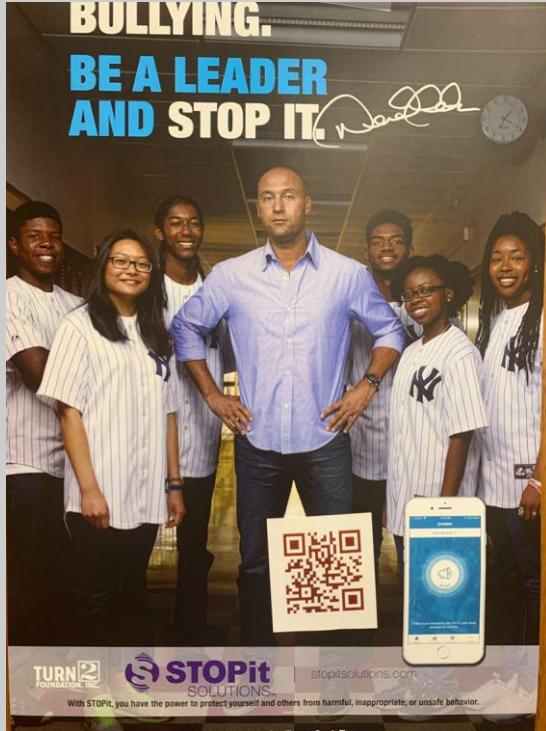
Program Equity
Recruitment, Admissions and Access
Pregnancy
Athletics & Extra Curriculars
Employment, Recruitment & Hiring
Course Access & Offerings
Sex, Gender, Gender Identity

Sexual Harassment

Sexual Assault
Sexual Misconduct
Bullying and Cyberbullying
Sexual Violence
Sexual Intimidation
Dating Violence
Sexual Exploitation
Retaliation



StopIT! Posters



Community Shared Information

Including presentation covering, recognizing and reporting abuse

All children deserve great childhoods.
If you suspect it, **REPORT** it.



24-Hour Statewide
Oklahoma Child Abuse Hotline 1.800.522.3511

Who Must Report?

Every person in Oklahoma who has reason to believe that a child under 18 has been abused or neglected or is in danger of being abused or neglected is required by law to promptly make a report.

Failure to report child abuse is a misdemeanor offense. A person who reports suspected abuse in "good faith" is immune from criminal and civil liability.

How to Report:

If you suspect abuse or neglect, take the following action:
Contact the Oklahoma Child Abuse Hotline **1.800.522.3511**.
If the child is in imminent danger, contact 911 or local law enforcement.

Wondering what can you do to help prevent abuse?

Contact the Family Support & Prevention Service
fspi.health.ok.gov or 405.271.7611

How can you support stressed parents in public?

All parents can be challenged while out with their child in public, especially when the child is tired, hungry, confined or bored. We can lessen parents stress by doing the following:

1. **BE KIND** and supportive. A gentle smile can go a long way.
2. **CONNECT** with the parent or child.
"It's not easy, is it? Remember when my kids were toddlers, too?" Think about how you would want to be treated in a similar situation.
3. **ASSIST** the parent by offering help. Examples include offering to read a book in a waiting room or providing an extra set of hands at the supermarket.

*Parenting isn't easy.
All parents need support.*

parentPRO
Free parenting support. Different in your area.
Find support at parentpro.org

The Oklahoma State Department of Health (OSDH) is a state government agency responsible for the public health of the state of Oklahoma. OSDH is committed to providing information and resources to help the public understand and prevent disease, injury, and disability. OSDH is also responsible for the regulation of health care services and the protection of the public health.



Title IX of the Education Amendments of 1972 prohibits discrimination based on sex in education programs and activities in federally funded schools at all levels. If you feel you are being bullied based on sexual discrimination, sexually harassed, abused, being stalked, homeless, human trafficking, or you feel like you need to report any Title IX case, please see your Title IX Team at **Ninnekah Public Schools**.

TITLE IX TEAM

Regina Jones, Elementary Principal (405) 222-0420
Title IX Coordinator rjones@ninnekah.k12.ok.us

Shelby Fuiks, Middle School Teacher (405) 224-4299
Title IX Investigator sfuiks@ninnekah.k12.ok.us

Deborah Fulton, Elementary Teacher (405) 222-0420
Title IX District Decision dfulton@ninnekah.k12.ok.us

1. Contact a teacher, adult or any school employee that you trust.
2. Contact the High School, Middle School, or Elementary Office.
3. Contact one of the Title IX Team members by phone, email, or in person.
4. After telling someone, make a report. Forms are available at each school site or online.
5. The Title IX coordinator will contact you to complete forms.
6. The Title IX coordinator will receive information and conduct an investigation of the case.
7. The District Decision Maker will review the investigators report to base the district decision.



New Administration starting June 1, 2022
Superintendent Dr. Ashley Davis

Professional Development for Title IX will be part of yearly trainings for
Ninnekah Public School District.

Student awareness of Title IX and training on how to make a report will be
incorporated into each year.

Ninnekah Public Schools is working closely with OSSBA in regards to Title IX.

Policy and Procedures will be updated as needed.