

NON-DISCRIMINATION AND TITLE IX POLICY & PROCEDURES

Non-Discrimination Policy

The Virtual Preparatory Academy of Arizona is committed to providing an environment that is free from all forms of sex discrimination, which includes gender-based discrimination, sexual harassment and sexual violence, as regulated by Title VII and Title IX, and to ensuring the accessibility of appropriate grievance procedures for addressing all complaints regarding all forms of sex discrimination and sexual harassment. VPA of AZ reserves the authority to independently deal with sex discrimination and sexual harassment whenever becoming aware of their existence, regardless of whether a complaint has been lodged in accordance with the grievance procedure set forth below.

Virtual Preparatory Academy of Arizona does not discriminate in enrollment based on ethnicity, national origin, religion, disability, gender, economic status, or sexual orientation. All employees shall report to the Title IX Coordinator at any time the employee has notice of sexual harassment, including allegations of sexual harassment.

Virtual Preparatory Academy of Arizona is committed to a learning environment that is free from sexual harassment. It is a violation of policy for any member of the school staff to harass students or for students to harass other students through conduct or communications (verbal, written, social media, or other electronic means) of a sexual nature or to retaliate against anyone that reports sexual harassment or participates in a harassment investigation.

Definitions

In order to properly identify issues that may comply under Title IX, specific definitions need to be provided for the Coordinator to use for determinations. Listed below are definitions for both sex discrimination and sexual harassment that pertain to both students and employees.

- Definition of Sex Discrimination and Sexual Harassment (for Students): Sex discrimination occurs when a person, because of his or her sex, is denied participation in or the benefits of any education program or activity that receives federal financial assistance. Sexual harassment is conduct that: 1) is sexual in nature; 2) is unwelcome; and 3) denies or limits a student's ability to participate in or benefit from a school's educational program or activity. Sexual harassment can be verbal, nonverbal or physical.
- Definition of Sex Discrimination and Sexual Harassment (for Employees): Sex discrimination occurs when a person who is qualified for a position at issue is subjected to an adverse employment action because of his or her sex. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: 1) submission to such conduct is made a term or condition of employment; 2) submission to or rejection of the conduct is used as a basis for employment decisions affecting the individual; or 3) the conduct has the purpose or effect of unreasonably interfering with the employee's work performance or creating an intimidating, hostile or offensive working environment.

Information and Assistance

Information regarding Title IX is presented to all families during a Federal Programs Parent Meeting that is held at the beginning of each school year.

Any individual who believes he/she may have experienced any form of sex discrimination or sexual harassment, or who believes that he/she has observed such actions taking place, may receive information

and assistance regarding the school's policies and reporting procedures from the Title IX Coordinator Dr. Kayleen Marble.

Dr. Marble can be reached:

- by email at kmarble@accelschools.com
- by phone at 480-229-8567
- by U.S. Mail: 433 N Hall Mesa, AZ 85203

Grievance Procedure

Any student, parent/guardian, current or prospective employee or other individual within the school community who believes he/she has experienced and/or observed sex discrimination or sexual harassment ("grievant") should promptly report the matter to the school's Title IX Coordinator, principal or other school administrator. A Title IX grievant is requested to complete a complaint form. Complaints of alleged sex discrimination, including sexual harassment, brought forth by students, parents/guardians, current or prospective employees, and other members of the school community will be promptly investigated in an impartial and in as confidential a manner as reasonably possible, so that corrective action can be taken if necessary.

The grievance procedures will be as follows:

1. It is the express policy of VPA OF AZ to encourage the prompt reporting of claims of sex discrimination and/or sexual harassment. Timely reporting of complaints facilitates the investigation and resolution of such complaints. A form for such purposes can be found on our website and will also be provided to the grievant. As it pertains to students, in appropriate circumstances, due to the age of the student making the complaint, a parent/guardian or school administrator may be permitted to fill out the form on the student's behalf.
2. At the time the complaint is filed, the grievant shall be given a copy of these grievance procedures. It is the responsibility of the Title IX Coordinator or designee to explain these procedures and answer any questions anyone has. In addition, if the grievant is a minor student, the Title IX Coordinator should consider whether a child abuse report should be completed in accordance with VPA OF AZ's policy on the Reports of Suspected Child Abuse or Neglect of Children.
3. The Title IX Coordinator or designee shall investigate the complaint as promptly as practicable but in no case more than ten (10) working days from the date the complaint was received. The Title IX Coordinator or designee shall have the complete cooperation of all people during the investigation.
4. The Title IX Coordinator or designee shall meet with all individuals reasonably believed to have relevant information, including the grievant and the individual(s) against whom the complaint was lodged, and any witnesses to the conduct. The investigation shall be carried out discreetly, maintaining confidentiality insofar as reasonably possible while conducting an effective investigation.
5. If after an investigation, the Title IX Coordinator or designee determines that there is reasonable cause to believe that sex discrimination or sexual harassment has occurred, the VPA OF AZ shall take appropriate corrective action in an effort to ensure that the conduct ceases and will not recur. The Title IX Coordinator or designee shall also provide and or arrange for confidential counseling or training where appropriate. In addition, the Title IX Coordinator or designee shall seek an informal agreement between the parties which is consistent with VPA OF AZ's Title IX principles and goals.

6. If no agreement satisfactory to the parties can be reached within twenty (20) working days from receipt of the complaint, the Title IX Coordinator or designee shall make a report to the School Board (for Students) or ACCEL HR (for Staff) within thirty (30) working days from receipt of the complaint.
7. The School Board (for Students) or ACCEL HR (for Staff) shall review the case and make its recommendations to the Title IX Coordinator within fifteen (15) working days after receiving the grievance.
8. The Title IX Coordinator shall make provisions to maintain all records of complaints and their disposition.
9. Retaliation against an individual for filing a complaint or cooperating in an investigation is strictly prohibited, and VPA OF AZ will take actions necessary to prevent such retaliation.

Dissemination of Information

VPA OF AZ shall notify applicants for admission and employment, students, parents/guardians of elementary and secondary school students, e/employees, and sources of referral of applicants for admission and employment, that it does not discriminate on the basis of sex in the educational programs or activities which it operates, and that it is required by Title IX and its administrative regulations not to discriminate in such a manner. The notification shall be made in the form and manner required by law or regulation.

TITLE IX COORDINATOR

Virtual Preparatory Academy of Arizona

Dr. Kayleen Marble

kmarble@accelschools.com

Board Approved 10/2/2025