

Conemaugh School of Nursing and Allied Health Programs

Title IX Policy: Non-Discrimination, Harassment, and Retaliation on the Basis of Sex

Rational for Policy

Conemaugh School of Nursing and Allied Health Programs are committed to providing a workplace and educational environment that are free from discrimination, harassment, and retaliation and promotes personal integrity, civility, and mutual respect. Conemaugh School of Nursing and Allied Health Programs considers sex discrimination in all its forms to be a serious offense. To ensure compliance with federal and state civil rights laws and regulations, Conemaugh School of Nursing and Allied Health Programs has developed internal policies and procedures that provide a prompt, fair, and impartial process for those involved in an allegation of discrimination or harassment on the basis of sex, and for allegations of retaliation. These procedures apply equally to both parties, whether the party is a student, faculty, staff member, or other individual participating or seeking to participate in an education program or activity.

Conemaugh School of Nursing and Allied Health Programs values and upholds the equal dignity of all members of its community and strives to balance the rights of the parties in the grievance process during what is often a difficult time for all those involved. Conemaugh is committed to fostering an environment free from sexual or gender-based harassment or misconduct. The School is also committed to providing support to those who may have been impacted by incidents of sexual or gender-based harassment or misconduct and may provide various resources and support services to individuals who have experienced one of these incidents.

What is Title IX?

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.”

Title IX is a federal law that prohibits discrimination based on sex in educational programs or activities that receive federal financial assistance. All forms of sexual or gender-based harassment, including but not limited to, dating and domestic violence, stalking, and sexual assault are violations of Title IX. Title IX protects individuals of all genders and sexual orientations and applies to students, faculty, staff members, and other participants in educational programs and activities.

The U.S. Department of Education’s Title IX regulations recognize that sexual harassment, including sexual assault, is unlawful sex discrimination. The Final Rule requires a prompt response to reports of sexual harassment. The Final Rule improves the clarity and transparency of the requirements for how schools must respond to sexual harassment under Title IX so that every complainant receives appropriate support, respondents are treated as responsible only after receiving due process and fundamental fairness, and school officials serve impartially without bias for or against any party.

For the purpose of this policy, the following definitions apply:

- “Education program or activity” includes locations, events, or circumstances over which the institution exercised substantial control over the accused student and the context in which the harassment occurs, as well as any buildings owned or controlled by an officially recognized student organization.
- “Deliberate indifference” is defined as a response to sexual harassment that is clearly unreasonable in light of the known circumstances.
- “Actual knowledge” occurs only if a school official with the authority to institute corrective measures receives notice of sexual harassment.
- “Complainant” means an individual who is alleged to be the victim of conduct that could constitute harassment or discrimination on the basis of sex: or retaliation for engaging in a protected activity.
- “Respondent” means an individual who has been reported to be the perpetrator of conduct that could constitute harassment or discrimination on the basis of sex; or retaliation for engaging in a protected activity.

- “Formal Complaint” is defined as a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.
- “Supportive Measures” is defined as individualized services reasonably available that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other party while designed to ensure equal educational access, protect safety, or deter sexual harassment.

Title IX Definition of Sexual Harassment

The Title IX Definition of sexual harassment covers three categories of conduct:

- Quid pro quo sexual harassment by employees;
- Sexual assault, dating violence, domestic violence, and stalking, as defined by the Clery Act and VAMA;
- Any other “unwelcome conduct on the basis of sex that is so severe, pervasive, and objectively offensive that it denies a person access to the recipient’s education program or activity.”

Other policies that may apply to situations involving sexual harassment, non-discrimination, and retaliation that do not fall under the Title IX policy include:

- Conemaugh Health System Non-Harassment Policy
- Conemaugh Health System Problem reporting and Non-Retaliation Policy
- Conemaugh School of Nursing and Allied Health Programs Code of Conduct

Title IX Contact Information

The School of Nursing and Allied Health Programs encourages those who have experienced any form of sex discrimination to report the incident promptly and to seek all available assistance. The school takes complaints very seriously and will work with the complainant and respondent to ensure their safety and to remedy the situation.

The Student Health Nurse serves as the Title IX Coordinator along with assistance from the Director and Associate Director of the School of Nursing and Allied Health Programs. The Title IX Coordinator oversees implementation of the Title IX Policy on Non-Discrimination, Harassment, and Retaliation on the Basis of Sex. Other responsibilities include coordinating efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy.

The following person has been designated to handle inquiries regarding the Title IX Policy:

Patricia Huber Smith, BSN, RN, Student Health Nurse
 Conemaugh School of Nursing and Allied Health Programs
 1086 Franklin Street
 Johnstown, PA 15905
 Phone: 814-534-9485
 Office Location: Education F Building Office F122
 E-mail: phubersm@conemaugh.org

Conemaugh School of Nursing and Allied Health Programs has classified all employees as Mandated Reporters or Campus Security Authorities (CSAs) as per the Clery Act of any knowledge they have that a member of the school community is experiencing harassment, discrimination, and/or retaliation under this policy. Mandated Reporters must promptly share with the Title IX Coordinator all know details of a report made to them in the course of their employment.

Complainants may want to carefully consider whether they share personally identifiable details with the Mandated Reporters, as those details must be shared with the Title IX Coordinator.

The Clery Act defines these Campus Security Authorities individuals as “an official of an institution who has significant responsibility for student and campus activities, including but not limited to student discipline and campus judicial proceedings. An official is defined as a person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.”

- Conemaugh Security Department
- Title IX Coordinator
- School of Nursing Director
- School of Nursing Associate Director
- Allied Health Programs Directors
- Allied Health Programs Clinical Coordinators/Staff
- Faculty
- Employee Health Office
- Emergency Department
- Clinical Site Contacts for non-campus locations that are providing an educational opportunity for students
- Grievance Committee Mediator

Complaints may also be discussed with the following:

Human Resources Department

Conemaugh Memorial Medical Center
1086 Franklin Street
Johnstown, PA 15905
814-534-9114

Corporate Compliance Department

Conemaugh Memorial Medical Center
1086 Franklin Street
Johnstown, PA 15905
814-410-8421
Corporate Compliance Hotline 1-866-519-4767

Office for Civil Rights

U.S. Department of Health and Human Services
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
Toll-free: (800) 368-1019
TDD toll-free: (800) 537-7697

Jamie Rahn Ballay, Acting Regional Manager

Office for Civil Rights

U.S. Department of Health and Human Services
801 Market Street, Suite 9300
Philadelphia, PA 19107-3134
Customer Response Center: (800) 368-1019
Fax: (202) 619-3818
TDD: (800) 537-7697
Email: ocrmail@hhs.gov

Confidential Resources

If a Complainant would like the details of a sexual harassment incident to be kept confidential without automatically triggering a report to the Title IX office and coordinator at the Conemaugh School of Nursing and Allied Health Programs, the Complainant may speak with:

- Off-campus Counselor (non-employees)
- Licensed professional counselors and other medical providers
- Local rape crisis counselors
- Domestic Violence resources
- Clergy/Chaplains
- Victim Services
638 Ferndale Avenue
Johnstown, PA 15905
814-288-4961
- Women's Help Center
809 Napoleon Street
Johnstown, PA 15901
814-536-5361

All of the above listed individuals will maintain confidentiality when acting under the scope of their licensure, professional ethics, and/or professional credentials, except in extreme cases of immediate threat of danger of abuse of a minor, elder, individual with a disability, or when required to disclose by law or court order.

Supportive Measures

Conemaugh School of Nursing and Allied Health Programs will offer and implement appropriate and reasonable supportive measures to all parties upon notice of alleged harassment, discrimination, and /or retaliation. Supportive measures are individualized services to restore or preserve equal access to education, protect student and employee safety, or deter sexual harassment. Every situation is unique, and individuals react to sexual harassment differently. The Final Rule gives complainants control over the school-level response best meeting their needs. It respects complainants' wishes and autonomy by giving them the clear choice to file a formal complaint, separate from the right to supportive measures. The Title IX Coordinator will promptly contact the complainant confidentially to discuss the available supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and will explain to the complainant the process for filing a formal complaint. These supportive services are without fee or charge.

How to report/file a complaint

Notice and Complaints of Discrimination, Harassment, and/or Retaliation

Reporting and providing notice are different from filing a complaint. A report is defined as notification of an incident of sexual misconduct to the Title IX Coordinator/designee by any responsible employee or reporting person. Filing a complaint initiates the formal resolution process.

Notice or complaints of discrimination, harassment, and/or retaliation may be made using any of the following options:

- a) File a complaint with, or give verbal notice to, the Title IX Coordinator. Email: phuber-s@conemaugh.org

Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

- b) Reporting via Conemaugh Intranet website: "Report a Disruptive Event"

<https://srm.rldatix.com/landing/chs>

c) Title IX Reporting Hotline 814-534-9776

All means above can be used for Anonymous Reporting. Conemaugh tries to provide supportive measures to all Complainants, which is impossible with an anonymous report. Because reporting carries no obligation to initiate a formal response, and as the School respects Complainant requests to dismiss complaints unless there is a compelling threat to health and/or safety, the Complainant is largely in control and should not fear a loss of privacy by making a report that allows Conemaugh School of Nursing & Allied Health to discuss and/or provide supportive measures.

A formal complaint means a document filed/signed by the Complainant or signed by the Title IX Coordinator alleging a policy violation by a Respondent and requesting that Conemaugh School of Nursing & Allied Health investigate the allegation(s). As used in this paragraph, the phrase “document filed by a Complainant” means a document or electronic submission (such as by electronic mail or through an online portal) that contains the Complainant’s physical or digital signature or otherwise indicates that the Complainant is the person filing the complaint.

If notice is submitted in a form that does not meet this standard, the Title IX Coordinator will contact the Complainant to ensure that it is filed correctly. There is no time limitation on providing notice/complaints.

Promptness

All allegations are acted upon promptly by the Conemaugh School of Nursing & Allied Health once it has received notice or a formal complaint. Complaints can take 60-90 business days to resolve, typically. There are always exceptions and extenuating circumstances that can cause a resolution to take longer, but the School will avoid all undue delays within its control.

Privacy

Every effort is made by the School to preserve the privacy of reports. Conemaugh School of Nursing & Allied Health will not share the identity of any individual who has made a report or complaint of harassment, discrimination, or retaliation; any Complainant, any Respondent, or any witness, except as permitted by the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g; FERPA regulations, 34 CFR part 99; or as required by law; or to carry out the purposes of 34 CFR Part 106, including the conducting of any investigation, hearing, or grievance proceeding arising under these policies and procedures.

Jurisdiction

This policy applies to the educational programs and activities of the Conemaugh School of Nursing & Allied Health, to conduct that takes place on the campus or on property owned or controlled by Conemaugh, at School-sponsored events, or in buildings owned or controlled by Conemaugh’s recognized student organizations. The Respondent must be a member of the School’s community for its policies to apply. Conemaugh School of Nursing & Allied Health may also extend jurisdiction to off-campus and/or to online conduct when the Title IX Coordinator determines that the conduct affects a substantial School interest.

Free Expression and Academic Freedom

Students, staff, administrators, and faculty are entitled to an employment and educational environment that is free of discriminatory harassment. Conemaugh’s Title IX policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive subject matters protected by academic freedom.

The sections below describe the specific forms of legally prohibited harassment that are also prohibited under Conemaugh’s Title IX Policy. When speech or conduct is protected by academic freedom and/or the First Amendment, it will not be considered a violation of Conemaugh’s policy, though supportive measures will be offered to those impacted.

1. Discriminatory Harassment

Discriminatory harassment constitutes a form of discrimination that is prohibited by Conemaugh policy. Discriminatory harassment is defined as unwelcome conduct by any member or group of the community on the basis of actual or perceived membership in a class protected by policy or law.

A hostile environment is one that unreasonably interferes with, limits, or effectively denies an individual's educational or employment access, benefits, or opportunities.

When discriminatory harassment rises to the level of creating a hostile environment, Conemaugh School of Nursing & Allied Health may also impose sanctions on the Respondent through application of the Non-discrimination, Harassment, Retaliation on the Basis of Sex grievance process.

2. Sexual Harassment

The Department of Education's Office for Civil Rights (OCR), the Equal Employment Opportunity Commission (EEOC), and the Commonwealth of Pennsylvania regard Sexual Harassment, a specific form of discriminatory harassment, as an unlawful discriminatory practice.

Conemaugh has adopted the following definition of Sexual Harassment in order to address the unique environment of an academic community, which consists not only of employer and employees, but of students as well.

Acts of sexual harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, and/or gender identity of those involved.

Sexual Harassment, as an umbrella category, includes the offenses of sexual harassment, sexual assault, domestic violence, dating violence, and stalking, and is defined as:

- A. Conduct on the basis of sex that satisfies one or more of the following:
 - a) Quid Pro Quo:
 - a. an employee of the School, conditions the provision of an aid, benefit, or service of the School, on an individual's participation in unwelcome sexual conduct; and/or
 - b) Sexual Harassment:
 - c) Unwelcome conduct, determined by a reasonable person, to be so severe, and pervasive, and, objectively offensive, that it effectively denies a person equal access to Conemaugh's education program or activity.
 - d) Sexual assault, including:
 - a. Sex Offenses, Forcible
 - b. Forcible Rape
 - c. Forcible Sodomy
 - d. Sexual Assault with an Object
 - e. Forcible Fondling
 - f. Sex Offenses, Non-forcible
 - a) Incest
 - b) Statutory Rape

3. Dating Violence, defined as:

Violence, on the basis of sex, committed by a person, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

For the purposes of this definition, dating violence includes, but is not limited to:

- Sexual or physical abuse or the threat of such abuse.
- Dating violence does not include acts covered under the definition of domestic violence.

4. Domestic Violence, defined as:

Violence, on the basis of sex, committed by:

- a current or former spouse or intimate partner of the Complainant,
- a person with whom the Complainant shares a child in common, or
- a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner, of
- a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Pennsylvania or
- any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Pennsylvania

To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.

5. Stalking, defined as:

Engaging in a course of conduct, on the basis of sex, directed at a specific person, that:

- would cause a reasonable person to fear for the person's safety, or
- the safety of others; or
- Suffer substantial emotional distress.

For the purposes of this definition,

- course of conduct means two or more acts including, but not limited to,
- acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- Reasonable person means a reasonable person under similar circumstances
- and with similar identities to the Complainant.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Consensual Relationships

There are inherent risks in any romantic or sexual relationship between individuals in unequal positions (such as teacher and student, supervisor and employee). These relationships may be less consensual than perceived by the individual whose position confers power.

The relationship also may be viewed in different ways by each of the parties, particularly in retrospect. Furthermore, circumstances may change, and conduct that was previously welcome may become unwelcome.

Even when both parties have consented at the outset to a romantic or sexual involvement, this past consent may not remove grounds for a later charge of a violation of applicable policies.

The School does not wish to interfere with private choices regarding personal relationships when these relationships do not interfere with the goals and policies of the School. For the personal protection of members of this community, relationships in which power differentials are inherent (faculty-student, staff-student, administrator-student, supervisor-supervisee) are generally discouraged.

Consensual romantic or sexual relationships in which one party maintains a direct supervisory or evaluative role over the other party are unethical; therefore, persons with direct supervisory or evaluative responsibilities who are involved in such relationships must bring those relationships to the timely attention of their supervisor, and will likely result in the necessity to remove the employee from the supervisory or evaluative responsibilities, or shift the student or employee out of being supervised or evaluated by someone with whom they have established a consensual relationship. While no relationships are prohibited by this policy, failure to self-report such relationships to a supervisor as required can result in disciplinary action for an employee.

Consent

As used in the offenses above, the following definitions and understandings apply:

Consent is:

- knowing, and voluntary, and clear permission by word or action to engage in sexual activity.

*The Commonwealth of Pennsylvania does not specifically define “consent.”

Force

Force is the use of physical violence and/or physical imposition to gain sexual access. Force also includes threats, intimidation (implied threats), and coercion that is intended to overcome resistance or produce consent (e.g., “Have sex with me or I’ll hit you”, “Okay, don’t hit me, I’ll do what you want”).

Coercion

Coercion is unreasonable pressure for sexual activity. Coercive conduct differs from seductive conduct based on factors such as the type and/or extent of the pressure used to obtain consent. When someone makes clear that they do not want to engage in certain sexual activity, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.

Incapacitation

A person cannot consent if they are unable to understand what is happening or is disoriented, helpless, asleep, or unconscious, for any reason, including by alcohol or other drugs. As stated above, a Respondent violates this policy if they engage in sexual activity with someone who is incapable of giving consent.

Retaliation

It is prohibited for Conemaugh School of Nursing & Allied Health or any member of the School’s community to take materially adverse action by intimidating, threatening, coercing, harassing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by law or policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy and procedure.

The exercise of rights protected under the First Amendment does not constitute retaliation.

Acts of alleged retaliation should be reported immediately to the Title IX Coordinator and will be promptly investigated. Conemaugh is prepared to take appropriate steps to protect individuals who fear that they may be subjected to retaliation.

Burden of proof

Burden of proof refers to whom has the responsibility of showing a violation has occurred. It is always the responsibility of the Conemaugh School of Nursing & Allied Health to satisfy the burden of proof. The respondent does not have the burden to prove that a violation did not occur.

Standard of Proof

The School uses the preponderance of the evidence standard in investigations of complaints alleging violations of this policy and any related violations. This means that the investigation determines whether it is more likely than not that a violation of the policy occurred.

Resolution following notice and/or filing of formal complaint

Following receipt of notice or a complaint of an alleged violation of this Policy, the Title IX Coordinator engages in an initial assessment, which is typically one to five business days in duration.

The parties may each have an Advisor of their choice present with them for all meetings and interviews within the resolution process, if they so choose. The parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available.

Conemaugh will initiate at least one of three responses:

1. Offering supportive measures because the Complainant does not want to proceed formally; and/or
2. An informal resolution; and/or
3. A Formal Grievance Process including an investigation and a hearing.
 - If an informal resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for informal resolution and may seek to determine if the Respondent is also willing to engage in informal resolution.

Informal Resolution can include three different approaches:

- 1) When the parties agree to resolve the matter through an alternate resolution mechanism;
 - 2) When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the resolution process; or
 - 3) When the Title IX Coordinator can resolve the matter informally by providing supportive measures to remedy the situation.
- If a Formal Grievance Process is preferred, the Title IX Coordinator determines if the alleged misconduct falls within the scope of Title IX. If it does, the Title IX Coordinator will initiate the formal investigation and grievance process, directing the investigation to address an incident, and/or a pattern of alleged misconduct, and/or a culture/climate issue, based on the nature of the complaint.

This process will include:

- 1) A notification of investigation and allegations to all parties.
- 2) Appointment of trained investigators.
- 3) Appointment of Decision Maker(s).
- 4) Interviewing of Complainant, Respondent and all relevant witnesses.
- 5) Creation of final investigative report.
- 6) Referral for hearing where applicable.
- 7) Live recorded hearing with cross examination of all parties.
- 8) Appointment of Appeals Officer.
- 9) Appeal.

The investigation and grievance process will determine whether the Policy has been violated. If so, the School will promptly implement effective remedies designed to ensure that it is not deliberately indifferent to harassment or discrimination, their potential recurrence, or their effects.

If it does not, the Title IX Coordinator determines that Title IX does not apply and will “dismiss” that aspect of the complaint and assesses which policies may apply. Dismissing a complaint under Title IX is procedural and does not limit the School’s authority to address a complaint with the appropriate process and remedies.

Conemaugh must dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:

1. The conduct alleged in the formal complaint would not constitute sexual harassment as defined in the Policy hereinabove, even if proved; and/or
2. The conduct did not occur in an educational program or activity controlled by the School (including buildings or property controlled by recognized student organizations), and/or the School does not have control of the Respondent; and/or
3. The conduct did not occur against a person in the United States; and/or
4. At the time of filing a formal complaint, a Complainant is not participating in or attempting to participate in the education program or activity of the School.

Sanctioning

Upon a finding that a violation has occurred, Conemaugh has the authority to impose sanctions upon the respondent. The sanctions will be implemented as soon as is feasible, either upon the outcome of any appeal or the expiration of the window to appeal without an appeal being requested.

The sanctions described in this policy are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed by external authorities.

Student sanctions may include:

- Warning
- Required Counseling
- Probation
- Suspension
- Expulsion
- Organizational Sanctions
- Other Actions

Employee sanctions may include (as per Conemaugh Memorial Medical Center HR Policy/Procedures):

- Warning – Verbal or Written
- Performance Improvement/Management Process
- Required Counseling
- Required Training or Education
- Probation
- Demotion
- Suspension with pay

- Suspension without pay
- Termination

Appeals

All requests for appeal consideration must be submitted in writing to the Title IX Coordinator within 5 business days of the delivery of the written finding of the Decision-maker. Any party may appeal the findings only under the grounds described below.

An Appeal Decision-maker will be designated by the Title IX Coordinator. Any party may appeal, but appeals are limited to the following grounds:

- A procedural error or omission occurred that significantly impacted the outcome of the hearing (e.g., substantiated bias, material deviation from established procedures, failure to correctly apply the evidentiary standard).
- To consider new evidence, unknown or unavailable during the investigation, that could substantially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included.
- The sanctions-imposed fall outside the range of sanctions the Recipient has designated for this offense and the cumulative record of the Respondent.

Record Keeping

Conemaugh School of Nursing & Allied Health will maintain for a period of seven years, records of:

1. Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required under federal regulation;
2. Any disciplinary sanctions imposed on the Respondent;
3. Any remedies provided to the Complainant designed to restore or preserve equal access to the Conemaugh School of Nursing & Allied Health's education program or activity;
4. Any appeal and the result therefrom;
5. Any Informal Resolution and the result therefrom;
6. All materials used to train Title IX Coordinators, Investigators, Decision-makers, and any person who facilitates an Informal Resolution process. Conemaugh School of Nursing & Allied Health will make these training materials publicly available on Conemaugh School of Nursing & Allied Health's website, and
7. Any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, including:
 - a. The basis for all conclusions that the response was not deliberately indifferent;
 - b. Any measures designed to restore or preserve equal access to the Conemaugh School of Nursing & Allied Health's education program or activity; and
 - c. If no supportive measures were provided to the Complainant, document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

Conemaugh School of Nursing & Allied Health will also maintain any and all records in accordance with state and federal laws.

Policy Effective Date: 08/14/2020