

STUDENT HANDBOOK



MEDICAL ASSISTING MEDICAL BILLING & CODING 2022/2023

The purpose of the Northern Career Institute is to prepare students to successfully meet the dynamic health care needs of individuals and institutions within our community. Faculty equips students with professional medical knowledge gained through hands-on lessons and real life experience. The Northern Career Institute offers students an affordable path to a better future.

Faculty

Lori Klonowski BSN, RN, M. Ed., Director of Adult Programming
440-602-5093
Lori.Klonowski@ncioh.edu

Lisa Cowles, DNP, APRN, CNP, Associate Director of Nursing
440-602-5097
Lisa.Cowles@ncioh.edu

Vicki Morley, M. Ed., Building Administrator
Northern Career Institute
440-602-5096
Vicki.Morley@ncioh.edu

Jeanette Grady, Building Secretary
Northern Career Institute
440-602-5094
Jeanette.Grady@ncioh.edu

Donna Solano, Financial Aid Officer
440-602-5091
Donna.Solano@ncioh.edu

Gloria Germano, Medical Billing & Coding Instructor
Gloria.Germano@ncioh.edu

Christine Voss, Medical Assisting Instructor
Christine.Voss@ncioh.edu

OUR MISSION

Mission.....

The Northern Career Institute prepares students for a meaningful career and beyond.

FORWARD

Dear Student:

We are very happy that you have decided to pursue career training at the Northern Career Institute. We hope that the time spent with us will be an exciting and challenging learning experience.

Please take a few moments to read through this handbook, so that you are aware of procedures, policies, and responsibilities specific for students. We would appreciate your signing and returning the last page of this handbook to your instructor.

Due to the COVID-19 Pandemic, policies may need to be changed and/or updated that take into consideration CDC and clinical site guidance and guidelines. Addendums will be posted on our website at ncioh.edu/addendums.

LEGAL NAME OF SCHOOL, ADDRESS AND PHONE NUMBER

Northern Career Institute – Eastlake Campus
34050 Glen Drive, Suite 2
Eastlake, Ohio 44095

440-602-5094

440-942-6983 FAX

1-800-750-0750 - Ohio Relay Service (TTY/Voice)

APPROVAL AND ACCREDITATION

The school is approved by the...

Ohio Department of Education,
Career and Technical Education

The Ohio Department of Higher
Education

The school is accredited by the...

Council on Occupational Education (COE)
(Accredited Institution)
7840 Roswell Road
Building 300, Suite 325
Atlanta, GA 30350

CONTROLLING AGENCY

Willoughby-Eastlake Board of Education
Interim Superintendent of Schools: Chuck Murphy

LIABILITY INSURANCE

Student Malpractice Blanket Liability provided by:

Mercer Health & Benefit Administration
1166 Avenue of the Americas
New York, NY 10036

ADMISSION REQUIREMENTS

All candidates for admission to the Northern Career Institute are considered on individual merits, without discrimination on the basis of age, creed, national or ethnic origin, race, color, sex, marital status, handicap, political affiliations or beliefs.

1. Application
 - a. Completed application.
2. Education
 - a. Candidate must have or be enrolled in a program to obtain a high school diploma, passing G.E.D. scores or Adult Diploma.
3. Personal Qualifications
 - a. References from two persons, preferably from an employer.
6. Background & Screening
 - a. BCI&I background check that meets compliance regulations with the Criminal Records Check Law in Ohio. Candidates who have not resided in Ohio in the past 5 years are also required to complete an FBI background check.
 - b. Negative Drug Screen on First Attempt (Medical Assisting Only)
7. Tuition
 - a. Payment or securing of tuition prior to entry into the program.

American Disability ACT (ADA)

The Northern Career Institute supports the concepts embraced in the American Disability Act of 1990, Section 503 and 504 of the Rehabilitation Act of 1973. Enrollees must be able to successfully complete the academic and externship objectives of the program in a timely manner, implementing the essential functions integral to the program. Individual, personal, and reasonable accommodations will be instituted to facilitate opportunities for the enrollee.

STUDENT HEALTH PROGRAM

The student health program is operated for the purpose of promoting and maintaining the health of the students. In order to better serve the health needs of the students, the following policies are in effect:

1. Health Screening Requirements to Attend the Clinical Portion (Medical Assisting)

Screening	Description
MMR	A positive titers indicating immunity to Rubeola, Rubella, and Mumps
Varicella (Chicken Pox)	A positive titer for varicella ***Please note: having chicken pox does not provide evidence of immunity. A blood titer is required.
Hepatitis B	A positive titer for Hepatitis B
Tdap	Appropriate immunization records for (Tetanus, Diphtheria, acellular Pertussis) is required and must be within the past 10

	years
Negative TB Skin Test	A negative TB skin test using the standard two-step Tuberculosis test OR IGRA Blood Assay in the previous 12 months. If there is a Positive TB Skin Test, a chest x-ray is required to show evidence that there is no active disease.
Annual Influenza Vaccine	Influenza season is October through March (Obtain in the fall during flu season)
Physical Examination	A physical examination is required within the past 12 months.
COVID-19 testing/vaccination	In the event testing and/or vaccination is required by a clinical site(s). May be required to test more than one time.

*All negative titers will require updated immunizations

*Titers must have been drawn within the last 5 years or you will need to have them redrawn

*Students are required to submit a Background Check, Negative TB Skin Test & Physical Examination annually. Failure to provide updated records will result in clinical absence.

*Depending on the externship site, there may be health screening requirements for Medical Billing & Coding

2. General Health Policies

Students will assume the financial responsibility for their own medical and dental care during the nine-month period.

It is advisable that students are covered by individual hospital health insurance.

In the event you have an accident or injury at home, on duty, at school, or while traveling to or from school, and are sent to the Emergency Room, you are to report this to the school in writing, giving a detailed explanation of the incident. Injuries incurred on duty are to be reported to the instructor who will insure that a written report is sent to the school and the supervisor. The student will be responsible for all liabilities. Both the school and affiliating agency are free of all liabilities.

Illnesses, injuries, and pregnancies are to be reported to the school immediately in writing. A physician's written statement is required to return/remain in school.

Emergency health care is available at the hospital, if necessary. However, this emergency cost and subsequent follow-up care through a private physician is at the student's expense.

When a student is treated by any physician, the student is to bring a statement from that physician as to the, limitation, and/or permission to return to duty.

Pregnant women must have written medical permission to remain in the program.

Any health situation which could influence the effectiveness of the student must be brought to the attention of the faculty, i.e., diabetes, resistant infections, use of tranquilizers, sedation, etc. for the continuing welfare of the student, patient, and the school.

3. Liability Insurance

Students are required to have liability insurance of no less than \$300,000/\$1,000,000. The liability insurance is covered in the cost of the tuition.

ADVANCED PLACEMENT

Individuals who have previously obtained education and/or experience may be eligible for advanced placement. The purpose of granting advanced placement is to prevent repetition of, and grant credit for, subjects in which the student is already proficient.

A. REQUIREMENT

The Director of Adult Programming reserves the right to evaluate past education and/or experience of the applicant(s) on an individual basis. The applicant(s) must meet the same requirements as all other students being admitted to the program.

The requirements include:

1. Completed application form
2. High School Transcripts or G.E.D. equivalency
3. Evidence of Meeting Health Screening Requirements (Medical Assisting Only)
4. Two letters of reference
5. Payment or securing of tuition prior to entry into the program
6. Negative Drug Screen on First Attempt (Medical Assisting Only)
7. BCI & I background check that meets compliance regulations with the Criminal Records Check Law in Ohio

Prerequisites for *eligibility and consideration* for advanced placement may include any one of the following:

1. Previous education in an approved school
2. A course grade of "C" or above will be accepted for transfer credit
3. All credit must be 5 years or less to receive transfer credit
4. An official transcript of courses completed must be on file in the student's record prior to the semester starting to receive transfer credit.

B. MILITARY EXPERIENCE

Any person with experience in the Armed Forces of the United States, or in the National Guard or in a reserve component that is seeking admission into a program with advanced standing must notify the school as soon as possible with this intent. The applicant must:

1. Complete an application and submit 2 references
2. Provide the Administrator with documentation of military education and/or skill training.

This documentation will be used to determine whether any of the military education or skills training is substantially equivalent to the course offered.

FINANCIAL OBLIGATIONS

If at any time a student has a past due balance of tuition/fees, access to their student management account may be turned off (which includes access to grades). Students will not receive their final course grades until their account is paid in full. Students who are in the 1st semester will not receive their final grades and will be withdrawn from the program if their account is not paid in full by the final payment due date.

Once their account is paid in full they may apply for re-admission and will be re-admitted when a seat becomes available.

Securement of tuition prior to entry into the program is required. Your seat in the program is not secured until you complete the financial aid process. If you are not eligible for financial aid or your eligibility does not cover the full cost, you will be required to sign a Payment Arrangement Agreement and make your first payment prior to securing your seat in the program.

CLASS REQUIREMENTS

- Students are responsible for obtaining assignments and classroom notes following an absence.
- Students will take the initiative in consulting their instructor regarding makeup work, tests, and/or any assistance needed with classroom work at any time during the program.
- **A maximum of two tests per semester can be made up. All other missed tests will receive a zero in the gradebook. Students are responsible for arranging test make up with their instructor.**
- Each student is expected to be punctual, attentive, and respectful in the assigned classroom and externship areas. Maintaining a professional demeanor is essential. Students are to be suitably prepared with a working knowledge of material covered to date and equipped with textbooks and materials necessary for that class.

Calamity Days – In the event Willoughby-Eastlake City Schools should close due to an unexpected calamity, hours missed will be made up within a reasonable time period. These make-up hours will be determined by the individual instructor or as externship sites are available. The addition of hours may be added before or after class/externship or Saturday hours if necessary. In the event the school building is closed, the student may be required to attend scheduled externship time, at the instructors' discretion.

PARKING PERMITS

Due to the limited number of parking spaces it is necessary to regulate who is allowed to park on campus. Parking permits will be issued to all students who apply. The cost of the permit is \$1.00.

YOU MUST HAVE A PERMIT TO PARK ON THE NORTHERN CAREER INSTITUTE CAMPUS.

Rules and Regulations

1. Parking permit applications are available at the main office.
2. Parking at the Northern Career Institute is a privilege, not a right. Students must follow all traffic ordinances and drive their cars in a safe, mature manner and parking passes may be revoked with no refund given.
3. Parking spaces are filled on a first-come, first-parked basis every day.

VACATIONS & HOLIDAYS

Students follow the Northern Career Institute Calendar. Holidays will be noted on the calendar. Please consult with the instructor should there be a question regarding classroom or externship time.

UNIFORM POLICY

Students should dress and maintain favorable personal appearance so that it will reflect in a positive manner upon themselves and the school. Students are to wear a scrub uniform, clean and in good repair, with white closed shoes, and student ID badge to the program and externship sites daily. All uniforms must adorn the Northern Career Institute logo. Replacement of ID badge is the responsibility of the student at a cost of \$15.00. Students are required to return the building entry badge when they exit the program. Entry badges that are lost or not returned will result in a \$50.00 replacement fee.

Hair

- Worn off the collar
- Long styles, ponytails, and braids must be secured up on head and remain up while in uniform.
- No extreme hairdos. Hair should be of natural color with no extreme hair colors.
- **Males** - Beards and mustaches must be neat and well trimmed.
- No hats, bandanas, or head wraps/coverings.

Cosmetics

- Deodorants are essential
- Perfumes, colognes and body powder are not permitted.

Jewelry - The following is permitted:

- Wedding ring
- Watch with sweep hand
- One pair of post earrings--gold, silver, pearl, white, or blue, ***are the only allowed visible body piercing. All other piercings must be removed, not covered, this includes tongue piercing.***
- Medalert bracelet or Medalert necklace
- *No neck chain may be worn.*

Tattoos – **Must** be covered.

Fingernails

- Nails are to be short, well groomed, and clean.
- **No artificial nails or nail polish is permitted (e.g. acrylic nails, wraps, gels, etc.)**

Students that are in non-compliance with uniform regulations will not be permitted to remain in the school setting or externship sites, and that day will be considered as a full day absence.

Cell Phone Policy

Cell phones should be silenced during classroom instruction. Students should refrain from personal use of their cell phone during classroom instruction. No cell phones are permitted in the externship setting.

Media Center

The media center is available to students before school after school hours.

Testing Policy

Each instructor will advise the student on test taking procedures. Cheating is a dismissible offense. **A maximum of two tests per semester can be made up. All other missed tests will**

receive a zero in the gradebook. Students are responsible for arranging test make up with their instructor.

Change of Legal Name, Address, and/or Phone Number

It is the student's responsibility to notify the school secretary and externship instructor of any change in the student's legal name, address, and/or phone number.

CONDUCT – STUDENT

It is expected that all students interact with each other, faculty, clients, staff and community based preceptors in a professional manner. Students are expected to demonstrate professional values such as:

- Assuming personal responsibility and being a conscientious student
- Interacting with peers, faculty, clients, staff and community based preceptors with courtesy and respect
- Work with peers and faculty in providing safe effective care
- Exhibiting a high standard of moral and ethical behavior

Respect for law and for those persons in authority shall be expected of all students. This includes conformity to school rules as well as general provisions of law affecting students. Respect for the rights of others, consideration of their privileges, and cooperative citizenship shall also be expected of all members of the school community. The Board of Education has zero tolerance of violent, disruptive, or inappropriate behavior by its students.

Respect for real and personal property; pride in one's work; achievement within the range of one's ability; and exemplary personal standards of courtesy, decency, and honesty shall be maintained in the schools of this District. It is the responsibility of students, teachers and administrators to maintain a classroom environment that:

- A. allows teachers to communicate effectively with all students in the class;
- B. allows all students in the class the opportunity to learn;
- C. has consequences that are fair, and developmentally appropriate;
- D. considers the student and the circumstances of the situation; and
- E. enforces the student Code of Conduct/Student Discipline Code accordingly.

Students may be subject to discipline for violation of the Code of Conduct/Student Discipline Code even if that conduct occurs on property not owned or controlled by the Board but that is connected to activities or incidents that have occurred on property owned or controlled by the Board, or conduct that, regardless of where it occurs, is directed at a Board official or employee, or the property of such official or employee.

Student conduct shall be governed by the rules and provisions of the Student Code of Conduct/Student Discipline Code. This Code of Conduct/Student Discipline Code shall be reviewed periodically.

SCHOOL/CLINICAL EXPECTATIONS/CODES/POLICIES/REGULATIONS:

1. Violation of Policies, Rules and Regulations

No student shall violate any Willoughby-Eastlake Schools Board of Education policies or school rules and regulations. Students are responsible for becoming familiar with all policies, rules and regulations.

2. Unlawful Behavior

Students must follow all civil and criminal laws and regulations, including but not limited to: gambling, theft, weapons, inducing panic, extortion, blackmail, controlled substances, gang-related behavior, cyber-crime, trespassing, damaging school/private property, etc.

3. Bombs/Firearms/Weapons/Dangerous Instruments

Students shall not possess any form of weapon or object resembling a weapon (look-alikes). Students also cannot use routine items as weapons (i.e., pencils, combs, etc.).

4. Physical Aggression/Fighting

Students shall keep their hands, feet, and objects to themselves and under control at all times. Students are considered to be fighting when they punch, hit or act violently toward another student. If only one student punches or acts violently toward the other, the incident is considered an assault.

5. Assault

Students shall not cause physical harm to any school staff member, student, patient, clinical employee or visitor, through deliberate, inappropriate contact, by either the student, or object under the student's control.

6. Controlled Substances

Students shall not use, be under the influence of, possess, buy or sell, offer to buy or sell, or transmit drugs (prescription or non-prescription), alcohol, tobacco or electronic tobacco products. This clause also forbids the possession of paraphernalia (pipes, lighters, e-cigs, etc.) or items that resemble (lookalikes) any of these substances.

7. Harassment/Intimidation/Bullying

Harassment: Causing, or attempting to cause, by action or encouragement, threatening, intimidating (bullying), degrading, injuring, disrespectful, or abusive acts towards another person; including, but not limited to race, religion, disability, gender, or national origin.

Sexual Harassment: Conduct such as, but not limited to: unwelcome or uninvited sexual advances; insults; suggestive comments and demands; leering; subtle forms of pressure; requests for sexual favors; unwelcome or uninvited physical conduct or physical action of a sexual nature; inappropriate verbal, written, or pictorial conduct of a sexual nature.

Hazing: Hazing is defined as performing any act or coercing another, including the victim, to perform any act of initiation into any class, team, or organization that causes or creates a risk of causing mental or physical harm. Permission, consent, or assumption of risk by an individual subjected to hazing shall not lessen the prohibitions contained in this policy.

Stalking: Uninvited conduct (such as purposely following a person, purposely being in another person's location) that interferes with a person's right to a school environment free from intimidation and

unhindered passage; directing uninvited behavior toward another person who does not want the perpetrator's attention.

Bullying: Bullying is the use of force, threat, or coercion to abuse, intimidate, or aggressively dominate others. The behavior is often repeated and habitual. One essential prerequisite is the perception, by the bully or by others, of an imbalance of social or physical power.

Cyber Bullying: Cyberbullying is bullying that takes place using electronic technology. Electronic technology includes devices and equipment such as cell phones, computers, and tablets as well as communication tools including social media sites, text messages, chat, and websites. Examples of cyberbullying may include potentially hurtful text messages or emails, rumors sent by email or posted on social networking sites, and embarrassing pictures, videos, websites, or fake profiles.

Threats/Intimidation: Conduct (written, verbal, graphic or physical) that a student exhibits towards another individual that:

- Causes mental or physical harm or places an individual in an unsafe or threatening situation
- Creates an intimidating, threatening, or abusive educational environment
- May include electronically transmitted acts (e.g. Internet, cell phones, e-mail, social media, or wireless hand-held devices)

8. Inappropriate Contact/Sexual Conduct

Students shall not participate in any form of sexual contact. This involves consensual and nonconsensual behavior.

9. Inappropriate Language/Abusive Language

Students are prohibited from being verbally abusive, profane or vulgar in any form, including spoken or written words, pictures, electronic transmissions/posts, text messages, and gestures.

10. Disruption/Disorderly Conduct

Students must conduct themselves in a manner which contributes to a safe and orderly environment at all times. Student behavior should promote a positive, structured school/clinical environment and learning process. Any behaviors which disrupt the school/clinical environment, or detract from an instructor's ability to teach or a student's ability to learn can be considered disruptive and/or disorderly conduct.

11. Disrespect/Defiance/Non-Compliance/Insubordination

Students shall comply with staff directives the first time they are given. They shall follow directions without argument or other display of disagreement. Students are expected to act in a respectful manner towards all Willoughby-Eastlake employees, clinical site staff, students, patients and visitors.

12. Tardy

Students must arrive on time to school/clinicals/classes.

13. Academic Dishonesty/Falsification

Students must present only their own work for all assignments, avoiding plagiarism from peers, internet sites, previous authors, etc. Further, students cannot falsify documents including doctor's notes, legal documents, etc.

14. Property Misuse/Vandalism

Students must use personal and/or school-owned items for their intended educational purpose only. Students must not cause or attempt to cause damage, defacement, or destruction of private or school/clinical property.

15. Dress Code:

Students are required to be in uniform at all times on school and clinical property.

16. Electronic Devices

Students must follow staff directions with regard to cell phones and other electronic devices. Failure to follow staff directions shall be considered insubordination.

17. Repeated Offenses

Students who repeatedly violate the Code of Conduct may receive escalating consequences, up to and including dismissal from the program.

DISMISSAL

Willoughby-Eastlake City Schools reserves the right to require, at any time, the dismissal of a student whose health, conduct, or level of achievement makes it inadvisable for the student to remain in the school. Willoughby-Eastlake City Schools reserves the right to summarily terminate any student's participation in any and all activities at any facility as a result of lack of competence or for any conduct or behavior which is considered by the Northern Career Institute to be detrimental or hazardous to patients/customers or staff or a violation of the facility's standards and policies. In the event of such termination, Willoughby-Eastlake City Schools will give notice to the student as soon as reasonably possible. Any further disciplinary action or appeal by the student will be limited to any applicable policies or procedures as set forth by the School.

Cheating is a dismissible offense. No student will be readmitted once dismissed for cheating.

Students must achieve 70% or above in all academic and externship courses to progress through the program. Students *may not* repeat externship if below 70% or found to be unsafe in externship, and therefore, are dismissed from the program without ability to return to the program.

An affiliating facility may request dismissal of any student whose conduct may have detrimental effects on its patients, personnel or visitors. No readmission to the program will be possible once dismissed for the above reason.

CHEMICAL ABUSE

Chemical/alcohol use and/or abuse, and/or a drug conviction are grounds for dismissal.

A student shall not possess, use, transmit, sell, conceal or be under the influence of any alcoholic beverage or intoxicant, any of the drugs of abuse defined by Ohio Revised Code Section 3719.011 or any controlled substance defined by Ohio Revised Code Section 3719.41, or counterfeit controlled substance (as described in H.B. 535) on school grounds, at school sponsored or related functions or activities off school grounds or at any other time the student is subject to school authority. Examples of drugs of abuse and controlled substances include, but are not limited to, narcotic drugs, hallucinogenic drugs, amphetamines, barbiturates, marijuana, glue, or other substances that could modify behavior.

Use of drugs authorized by medical prescription from a licensed physician shall not be considered a violation of this rule.

A student shall not possess, use, transmit, sell or conceal any drug of abuse on school grounds, at school sponsored or related functions or activities off school grounds or at any other time the student is subject to school authority.

In conjunction with Willoughby-Eastlake City Schools and Eastlake Police Department, drug dogs may be used to search any and all cars parked in the schools parking lots.

SMOKING

Smoking is **not** permitted at the externship sites or on or around the Northern Career Institute campus. This includes electronic cigarettes, etc.

ATTENDANCE

Punctuality to class is a must. If you are tardy to class, it is your responsibility to sign in with the instructor, indicating the time you arrived. If you leave early from class, it is your responsibility to sign out with the instructor, indicating the time you left. Failure to sign in or out will result in a 5-hour absence. Daily attendance during both semesters is encouraged for maximum student achievement. Absences can lead to deficiencies in satisfying minimum requirements of the course. Failure to meet these requirements will prevent a student from continuing in the program.

During clinicals/externships, report absence to the instructor at least **ONE** hour before assigned starting time. Each instructor will provide you contact information in the event you will miss a clinical/externship experience. If you are unable to reach your instructor, please leave a phone message in the office at [\(440\) 602-5094](tel:4406025094). Absences that are not reported at least **ONE** hour before assigned starting time will be considered a **NO CALL/NO SHOW**.

Each student should miss no more than a total of 30 hours. Regardless of grade point average, a student will be dismissed from the program once they exceed 30 hours absence per semester. Regardless of grade point average, a student absent from a clinical/externship day without proper notification (no call/no show) will be subject to disciplinary action, up to and including termination. Regardless of grade point average, a student absent more than 10 clinical/externship hours will be subject to disciplinary action, up to and including termination.

GRADING AND EVALUATION POLICIES

1. A satisfactory level of achievement (70% minimum) is expected of all students in each course, including externship. Students receiving less than satisfactory grades will be considered for dismissal.

2. Grading includes:
 - a. Compliance with the standards of the school and meeting the course objectives.
 - b. The attainment of skills and meeting the acceptable standards for all externship experiences.
 - c. Meeting the acceptable standards of ethics in regards to conduct, attitude, and professionalism.
 - d. Each course is graded independently and students must obtain a minimum of 70% in each course to progress through the program.

3. Grading System:

90% - 100% = A

80% - 89% = B

70% - 79% = C

60% - 69% = D

Below 59% = F

GUIDANCE AND COUNSELING

Conferences are held between the instructor and student as soon as the student's grade average falls below **70%** in any subject. These conferences are to help the student examine various study strategies to improve grades. At this time, the student may be placed on probation.

The student may request a conference with a program administrator or instructor as the need arises. A program administrator will see any student at any time.

PROGRESSION & PERIODIC EVALUATION

First Semester

A **grade of 70%** in all subjects is to be maintained. Grades below **70%** are considered unsatisfactory.

In the event a grade is lower than **70%** the student has the remaining semester time to bring that grade up to a **minimum of 70%**. Grades are accumulative. In the event the final grade is below **70%** in any subject, or externship, the student will be dismissed.

To progress to the second semester of the program, a student must have at least a 70% in all first semester courses.

Second Semester

Grades are accumulative for each semester. A grade of **70%** is to be maintained in each subject.

Externship evaluations will be received at the end of each rotation or unit of study or change of instructor. The externship evaluation will reflect individual strengths and weaknesses. Less than **70%** in externship will necessitate dismissal from the program. A student is not eligible to repeat the second semester if they fall below **70%** in externship for the second semester.

Upon request, an administrator and instructor are available for discussion of student's progress.

REPEATING COURSES

A student who withdraws from or has a final grade below 70% in a course is permitted to retake the course ONE time. If the student withdraws from or has a final grade below 70% the course a second time, the student will be withdrawn from the program and will be unable to re-enroll into the program.

A student is unable to repeat externship if their final grade is below 70%. A final grade below 70% in an externship will result in the student being withdrawn from the program and will be unable to re-enroll into the program.

PROBATION

A probation period can be any length of time. A student may be put on probation for a variety of reasons, including but not limited to academics, attendance and conduct. A student is limited to two probation periods throughout the program.

Probationary status means that the student may be recommended for dismissal.

A student has the right to appeal (to be heard) before a disciplinary board that is comprised of members of the advisory committee.

The records of students on probation will be reviewed at each faculty meeting. The faculty may recommend the removal of a student from probationary status when the deficient criteria have been met.

WITHDRAWAL

All requests for withdrawal from the program must be stated in writing.

GRIEVANCE AND APPEAL

Purpose:

The grievance procedure provides nursing students with a process to:

1. Resolve concerns or disagreements arising from their interactions with nursing faculty or staff: or
2. Appeal the interpretation or application of a policy or procedure affecting the student.

Operating Principles:

1. A dispute or grievance is best resolved informally with an effort by each party involved to listen carefully and respectfully to the others.
2. If the student wishes to appeal the matter after discussion with the person(s) involved in the incident, or with the person who made the decision that caused concern, he/she is entitled to do so.
3. All appeals will be handled in a confidential manner, with efforts made to ensure objectivity and fairness.

4. No student who appeals a decision will be subject to any reprisals as a result of such appeal.
5. If the appeal results from a dispute regarding a grade issued by an instructor, the burden will be on the student to prove that the instructor has made an error, or that the instructor has applied non-uniform standards in assigning the grade.
6. A student who has been dismissed may not attend class or clinical while pursuing the grievance.

Procedure:

1. If a student has been unable to resolve a concern or disagreement with a nursing faculty member, the student may request to meet with the involved faculty member and the building administrator or designee to attempt to resolve the conflict within one (1) school day of the conflict.
2. If the conflict is not resolved, the student may appeal the matter in writing within two (2) school days from the date of the above meeting to the building administrator or designee.
2. When writing the concern to the building administrator or designee, the student should describe:
 - a. The problem: who, what, where, when, and to whom.
 - b. Evidence or facts available to support the student's concern.
3. A faculty panel made up of Willoughby-Eastlake City Schools faculty members will gather both written and verbal information from all involved parties.
4. A faculty panel will act as a mediator at a scheduled meeting of all involved persons not more than ten (10) school days from the date of the incident.
5. A designated member of the faculty panel will issue a decision in writing to all parties involved.
6. If the student is dissatisfied with the faculty panel's decision, within two (2) school days of the panel's decision, the student may submit a written appeal requesting to meet with the Director of Nursing or designee.
7. The decision of the Director of Nursing or designee will be considered final and will terminate the process within the school. The Director of Nursing or designee will issue a decision in writing to all parties involved.
8. After a student has completed the internal grievance and appeal procedure, the student may continue their appeal by contacting:

COUNCIL ON OCCUPATIONAL EDUCATION
7840 Roswell Road, Building 300, Suite 325, Atlanta, GA 30350
(770)396-3898 or (800) 917-2081
Facsimile (770)396-3790
www.council.org

and/or

OHIO DEPARTMENT OF HIGHER EDUCATION
25 South Front Street, Columbus, OH 43215
(614) 466-6000
Facsimile (614) 466-5866
<https://www.ohiohighered.org/students/complaint>

PROGRAM COMPLETION

Students may repeat only one of the two semesters for a maximum of three semesters. Students who have satisfactorily completed the requirements of the course and met the school's objectives will be considered program completers from the Northern Career Institute.

All tuition fees and school expenses must be paid in full before a graduate receives their final grades and authorization to take any certification exams.

FINGERPRINTING & BACKGROUND CHECKS

An electronic fingerprint for Criminal BCI & I must be received by the Northern Career Institute. The results will be reviewed. Results may also be shared with our externship partners. Should a background check be unacceptable to an externship partner, the student will not be permitted to continue in the program.

TRANSCRIPT SERVICE

Transcripts will be released from the Northern Career Institute office when authorized in writing/electronically by a student or graduate.

Please note that transcripts are **NOT ISSUED** for students with outstanding financial balances to the Northern Career Institute or delinquent on student loan payments.

FOLLOW-UP AND PLACEMENT

Graduates shall keep the school advised of any changes in name, address, and employment.

RE-ADMISSION

Former students who wish to apply for re-admission to the school must submit, in writing, their request to the director or complete the re-admission application. The letter should include a summary of work and/or educational activities undertaken since the last date of enrollment. The Director of Adult Programming will consider each request on an individual basis. The school reserves the right to require repetition of courses regardless of the student's previous level of achievement.

Re-admission is dependent upon available space. Tuition will be adjusted according to rate of re-entry year. Tuition will be payable in full upon readmission.

DISCLAIMER STATEMENT

The Northern Career Institute abides by all federal, state, and local laws and regulations including Title IX and nondiscrimination against any student because of race, color, creed, sex, religion, citizenship, economic status, married status, pregnancy, handicap, physical characteristics, age, national origin, political affiliations or beliefs. This policy will prevail in all matters concerning staff, student, educational programs and services, the public and individuals with who this organization does business.

Auxiliary aids and services are available upon the request of individuals with disabilities.
Equal Opportunity Employer.

ACCOMMODATIONS

Accommodation requests include assistance such as extra time, a separate room or reading assistance. It is the responsibility of the student to disclose their disability and need for accommodations as well as provide documentation.

Documentation required must include the following:

1. A letter from the student that includes information regarding the specific type of disability involved, the specific type of accommodations requested, and the student's contact information.
2. Current documentation (within the past year) submitted directly to the Northern Career Institute from a qualified professional with expertise in the area of the diagnosed disability, on the professional's letterhead stating:
 - the student's current disability diagnosis;
 - recommendations for testing accommodations appropriate for the diagnosed disability (i.e. time and a half, private room); and
 - the professional may include documentation such as recent reports, test results, evaluations and assessments of the applicant's need for accommodations; and may include information regarding the history of the disability and past accommodations granted to the applicant, if any.

Accommodation requests based on anxiety or phobia must be supported by a specific and professionally recognized diagnosis found in the Diagnostic and Statistical Manual of Mental Disorders (DSM).

The documentation from the qualified professional must be sent directly to the Northern Career Institute via email at office@ncioh.edu or by fax to (440) 942-6983.

Students with accommodations approved through proper documentation listed above are responsible for contacting the faculty member in charge of the course to disclose approved accommodations.

5517 - ANTI-HARASSMENT

General Policy Statement

It is the policy of the Board of Education to maintain an education and work environment that is free from all forms of unlawful harassment, including sexual harassment. This commitment applies to all School District operations, programs, and activities. All students, administrators, teachers, staff, and all other school personnel share responsibility for avoiding, discouraging, and reporting any form of unlawful harassment. This policy applies to unlawful conduct occurring on school property, or at another location if such conduct occurs during an activity sponsored by the Board.

The Board will vigorously enforce its prohibition against discriminatory harassment based on race, color, national origin, sex (including sexual orientation and gender identity), disability, age (except as authorized by law), religion, ancestry, or genetic information (collectively, "Protected Classes") that are protected by Federal civil rights laws (hereinafter referred to as unlawful harassment), and encourages those within the School District community as well as Third Parties, who feel aggrieved to seek assistance to rectify such problems. The Board will investigate all allegations of unlawful harassment and in those

cases where unlawful harassment is substantiated, the Board will take immediate steps to end the harassment, prevent its reoccurrence, and remedy its effects. Individuals who are found to have engaged in unlawful harassment will be subject to appropriate disciplinary action.

The District will offer counseling services to any person found to have been subjected to unlawful harassment, and, where appropriate, the person(s) who committed the unlawful harassment.

Other Violations of the Anti-Harassment Policy

The Board will also take immediate steps to impose disciplinary action on individuals engaging in any of the following prohibited acts:

Retaliating against a person who has made a report or filed a complaint alleging unlawful harassment, or who has participated as a witness in a harassment investigation.

Filing a malicious or knowingly false report or complaint of unlawful harassment.

Disregarding, failing to investigate adequately, or delaying investigation of allegations of unlawful harassment, when responsibility for reporting and/or investigating harassment charges comprises part of one's supervisory duties.

Definitions

Words used in this policy shall have those meanings defined herein; words not defined herein shall be construed according to their plain and ordinary meanings.

Complainant is the individual who alleges, or is alleged, to have been subjected to unlawful harassment, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged harassment.

Respondent is the individual who has been alleged to have engaged in unlawful harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

School District community means students and Board employees (i.e., administrators, and professional and classified staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Day(s): Unless expressly stated otherwise, the term "day" or "days" as used in this policy means business day(s) (i.e., a day(s) that the Board office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Bullying

Bullying rises to the level of unlawful harassment when one (1) or more persons systematically and chronically inflict physical hurt or psychological distress on one (1) or more students or employees and that bullying is based upon one (1) or more Protected Classes, that is, characteristics that are protected by

Federal civil rights laws. It is defined as any unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by an adult or student, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational or work environment; cause discomfort or humiliation; or unreasonably interfere with the individual's school or work performance or participation; and may involve: teasing; threats; intimidation; stalking; cyberstalking; cyberbullying; physical violence; theft; sexual, religious, or racial harassment; public humiliation; or destruction of property.

Harassment

Harassment means any threatening, insulting, or dehumanizing gesture, use of technology, or written, verbal or physical conduct directed against a student or school employee that: places a student or school employee in reasonable fear of harm to his/her person or damage to his/her property; has the effect of substantially interfering with a student's educational performance, opportunities, or benefits, or an employee's work performance; or has the effect of substantially disrupting the orderly operation of a school.

Sexual Harassment

For purposes of this policy and consistent with Title VII of the Civil Rights Act of 1964, "sexual harassment" is defined as:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when: Submission to such conduct is made either implicitly or explicitly a term or condition of an individual's employment, or status in a class, educational program, or activity. Submission or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such individual. Such conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working, and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity.

Sexual harassment may involve the behavior of a person of any gender against a person of the same or another gender.

Sexual Harassment covered by Policy 2266 - Nondiscrimination on the Basis of Sex Education Programs or Activities is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to: Unwelcome sexual propositions, invitations, solicitations, and flirtations. Unwanted physical and/or sexual contact. Threats or insinuations that a person's employment, wages, academic grade, promotion, classroom work or assignments, academic status, participation in athletics or extra-curricular programs, activities, or events, or other conditions of employment or education may be adversely affected by not submitting to sexual advances. Unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls. Sexually suggestive objects, pictures, graffiti, videos, posters, audio recordings or literature, placed in the work or educational environment, that may reasonably embarrass or offend individuals. Unwelcome and inappropriate touching, patting, or pinching; obscene gestures. Asking about, or telling about, sexual fantasies, sexual preferences, or sexual activities. Speculations

about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history. Giving unwelcome personal gifts such as lingerie that suggests the desire for a romantic relationship. Leering or staring at someone in a sexual way, such as staring at a person's breasts, buttocks, or groin. A pattern of conduct, which can be subtle in nature, that has sexual overtones and is intended to create or has the effect of creating discomfort and/or humiliation to another. Inappropriate boundary invasions by a District employee or other adult member of the School District community into a student's personal space and personal life. Verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

Not all behavior with sexual connotations constitutes unlawful sexual harassment. Sex-based or gender-based conduct must be sufficiently severe, pervasive, and persistent such that it adversely affects, limits, or denies an individual's employment or education, or such that it creates a hostile or abusive employment or educational environment, or such that it is intended to, or has the effect of, denying or limiting a student's ability to participate in or benefit from the educational program or activities.

Race/Color Harassment

Prohibited racial harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race or color and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working, and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references relative to racial customs.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's disability and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the

characteristics of a person's disability, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like.

Anti-Harassment Compliance Officers

The following individual(s) shall serve as the District's Anti-Harassment Compliance Officer(s) (hereinafter, "the Compliance Officer(s)"):

Mr. Chuck Murphy, Assistant Superintendent
35353 Curtis Blvd.
Eastlake, Ohio 44095
440-946-5000

Ms. Heather Dodd, Director of Pupil Services
35353 Curtis Blvd.
Eastlake, Ohio 44095
440-946-5000

The names, titles, and contact information of these individuals will be published annually on the School District's website.

The Compliance Officer(s) are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

The Compliance Officer(s) will be available during regular school/work hours to discuss concerns related to unlawful harassment, to assist students, other members of the District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct, or to intercede informally on behalf of the individual in those instances where concerns have not resulted in the filing of a formal complaint and where all parties are in agreement to participate in an informal process.

Compliance Officers shall accept reports of unlawful harassment directly from any member of the School District community or a Third Party or receive reports that are initially filed with an administrator, supervisor, or other District-level official. Upon receipt of a report of alleged harassment, the Compliance Officer(s) will contact the Complainant and begin either an informal or formal complaint process (depending on the request of the Complainant or the nature of the alleged harassment), or the Compliance Officer(s) will designate a specific individual to conduct such a process. The Compliance Officer(s) will provide a copy of this policy to the Complainant and Respondent. In the case of a formal complaint, the Compliance Officer(s) will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees must report incidents of harassment that are reported to them to the Compliance Officer within two (2) days of learning of the incident.

Any Board employee who directly observes unlawful harassment is obligated, in accordance with this policy, to report such observations to the Compliance Officer(s) within two (2) days. Additionally, any Board employee who observes an act of unlawful harassment is expected to intervene to stop the harassment, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the harassment. Thereafter, the Compliance Officer(s) or designee must contact the Complainant, if age eighteen (18) or older, or Complainant's parents/guardians if the Complainant is under the age eighteen (18), within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Reports and Complaints of Harassing Conduct

Students and all other members of the School District community along with Third Parties are required to report incidents of harassing conduct to a teacher, administrator, supervisor, or other District official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any teacher, administrator, supervisor, or other District employee or official who receives such a report shall file it with the Compliance Officer within two (2) days of receiving the report of harassment.

Members of the School District community and Third Parties, which includes students, or third parties who believe they have been unlawfully harassed are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the Complainant's employment or participation in educational or extra-curricular programs. While there are no time limits for initiating complaints of harassment under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

If, during an investigation of alleged bullying, aggressive behavior and/or harassment in accordance with Policy 5517.01 - Bullying and Other Forms of Aggressive Behavior, the Principal believes that the reported misconduct may have created a hostile work environment and may have constituted unlawful discriminatory harassment based on a Protected Class, the Principal shall report the act of bullying, aggressive behavior and/or harassment to the Compliance Officers who shall investigate the allegation in accordance with this policy. If the alleged harassment involves Sexual Harassment as defined by Policy 2266, the matter will be handled in accordance with the grievance process and procedures outlined in Policy 2266. While the Compliance Officer investigates the allegation, or the matter is being addressed pursuant to Policy 2266, the Principal shall suspend the Policy 5517.01 investigation to await the Compliance Officer's written report or the determination of responsibility pursuant to Policy 2266. The Compliance Officer shall keep the Principal informed of the status of the Policy 5517 investigation and provide the Principal with a copy of the resulting written report. Likewise, the Title IX Coordinator will provide the Principal with the determination of responsibility that results from the Policy 2266 grievance process.

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, any student who believes that they have been subjected to unlawful harassment may seek resolution of the complaint through the procedures described below. The formal complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated.

Due to the sensitivity surrounding complaints of unlawful harassment or retaliation, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. Once the formal complaint process is begun, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) business days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of a student to pursue a complaint of unlawful harassment or retaliation with the United States Department of Education Office for Civil Rights.

Informal Complaint Procedure

The goal of the informal complaint procedure is promptly to stop inappropriate behavior and to facilitate resolution through an informal means, if possible. The informal complaint procedure is provided as a less formal option for a student who believes s/he has been unlawfully harassed or retaliated against. This informal procedure is not required as a precursor to the filing of a formal complaint. The informal process is only available in those circumstances where the Complainant and the Respondent mutually agree to participate in it.

Students who believe that they have been unlawfully harassed may initiate their complaint through this informal complaint process, but are not required to do so. The informal process is only available in those circumstances where the parties (alleged target of harassment and alleged harasser(s)) agree to participate in the informal process.

The Complainant may proceed immediately to the formal complaint process and individuals who seek resolution through the informal procedure may request that the informal process be terminated at any time to move to the formal complaint process.

All complainants involving a District employee, any other adult member of the School District community, or a Third Party and a student will be formally investigated.

As an initial course of action, if a Complainant feels comfortable and safe in doing so, the individual should tell or otherwise inform the Respondent that the alleged harassing conduct is inappropriate and must stop. The Complainant should address the allegedly harassing conduct as soon after it occurs as possible. The Compliance Officers are available to support and counsel individuals when taking this initial step or to intervene on behalf of the Complainant if requested to do so. A Complainant who is uncomfortable or unwilling to directly approach the Respondent about the alleged inappropriate conduct may file an informal or a formal complaint. In addition, with regard to certain types of unlawful harassment, such as sexual harassment, the Compliance Officer may advise against the use of the informal complaint process.

A Complainant may make an informal complaint, either orally or in writing: 1) to a teacher, other employee, or building administrator in the school the student attends; 2) to the Superintendent or other District-level employee; and/or 3) directly to one of the Compliance Officers.

All informal complaints must be reported to one of the Compliance Officers who will either facilitate an informal resolution as described below, or appoint another individual to facilitate an informal resolution.

The Board's informal complaint procedure is designed to provide students who believe they are being unlawfully harassed with a range of options designed to bring about a resolution of their concerns. Depending upon the nature of the complaint and the wishes of the Complainant, informal resolution may involve, but not be limited to, one or more of the following:

Advising the Complainant about how to communicate the unwelcome nature of the behavior to the Respondent.

Distributing a copy of this policy as a reminder to the individuals in the school building or office where the Respondent works or attends.

If both parties agree, the Compliance Officer may arrange and facilitate a meeting or mediation between the Complainant and the Respondent to work out a mutual resolution.

While there are no set time limits within which an informal complaint must be resolved, the Compliance Officer/designee is directed to attempt to resolve all informal complaints within fifteen (15) business days of receiving the informal complaint. If the Complainant is dissatisfied with the informal complaint process, the Complainant may proceed to file a formal complaint. And, as stated above, either party may request that the informal process be terminated at any time to move to the formal complaint process.

Formal Complaint Procedure

If a complaint is not resolved through the informal complaint process, if one of the parties has requested that the informal complaint process be terminated to move to the formal complaint process, or the Complainant, from the outset, elects to file a formal complaint, or the CO determines the allegations are not appropriate for resolution through the informal process, the formal complaint process shall be implemented.

The Complainant may file a formal complaint, either orally or in writing, with a teacher, principal, or other District employee at the student's school, the Compliance Officer, Superintendent, or another District official who works at another school or at the district level. Due to the sensitivity surrounding complaints of unlawful harassment, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a formal complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a teacher, principal, or other District employee at the student's school, Superintendent, or other District official, either orally or in writing, about any complaint of harassment, that employee must report such information to the Compliance Officer within two (2) business days.

Throughout the course of the process, the Compliance Officer should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All formal complaints must include the following information to the extent known: the identity of the Respondent; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the Compliance Officer shall ask for such details in an oral interview. Thereafter, the Compliance Officer will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a formal complaint, the Compliance Officer will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation, including, but not limited to, a change of work assignment or schedule for the Complainant and/or the Respondent. In making such a determination, the Compliance Officer should consult the Complainant to assess whether the individual agrees with the proposed action. If the Complainant is unwilling to consent to the proposed change, the Compliance Officer may still take whatever actions deemed appropriate in consultation with the Superintendent.

Within two (2) business days of receiving the complaint, the Compliance Officer/designee will initiate a formal investigation to determine whether the Complainant has been subjected to offensive conduct/harassment/retaliation. The Principal will not conduct an investigation unless directed to do so by the Compliance Officer.

Simultaneously, the Compliance Officer will inform the Respondent that a formal complaint has been received. The Respondent will be informed about the nature of the allegations and provided with a copy

of any relevant policies and/or administrative guidelines, including the Board's Anti-Harassment policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint within five (5) business days.

Although certain cases may require additional time, the Compliance Officer/designee will attempt to complete an investigation into the allegations of harassment/retaliation within fifteen (15) business days of receiving the formal complaint. The investigation will include: interviews with the Complainant; interviews with the Respondent; interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations; consideration of any documentation or other information presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations.

At the conclusion of the investigation, the Compliance Officer or the designee shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of unlawful harassment as provided in Board policy and State and Federal law as to whether the Complainant has been subjected to unlawful harassment. The Compliance Officer's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved. In determining if discriminatory harassment or retaliation occurred, a preponderance of evidence standard will be used. The Compliance Officer may consult with the Board's legal counsel before finalizing the report to the Superintendent.

Absent extenuating circumstances, within ten (10) school days of receiving the report of the Compliance Officer/designee, the Superintendent must either issue a written decision regarding whether the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's final decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within ten (10) school days. At the conclusion of the additional investigation, the Superintendent shall issue a written decision as described above.

The decision of the Superintendent shall be final.

The Board reserves the right to investigate and resolve a complaint or report of unlawful harassment/retaliation regardless of whether the student alleging the unlawful harassment/retaliation pursues the complaint. The Board also reserves the right to have the formal complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board or its designee.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint process is not a prerequisite to the pursuit of other remedies.

Privacy/Confidentiality

The District will employ all reasonable efforts to protect the rights of the Complainant, the Respondent, and the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligations. All records generated

under the terms of this policy and related administrative guidelines shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of a formal investigation, the Compliance Officer/designee will instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided during the course of the investigation.

Sanctions and Monitoring

The Board shall vigorously enforce its prohibitions against unlawful harassment/retaliation by taking appropriate action reasonably calculated to stop the harassment and prevent further such harassment. While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and the terms of the relevant collective bargaining agreement(s). When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the ages and maturity levels of those involved. In those cases where unlawful harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies, consistent with the terms of the relevant collective bargaining agreement(s).

Where the Board becomes aware that a prior remedial action has been taken against a member of the School District community, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging unlawful harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a report, formal complaint testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person from making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in imposition of disciplinary sanction/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

The exercise of rights protected under the First Amendment of the United States Constitution does not constitute retaliation prohibited under this policy.

Allegations Constituting Criminal Conduct: Child Abuse/Sexual Misconduct

State law requires any school teacher or school employee who knows or suspects that a child with a disability under the age of twenty-one (21) or that a child under the age of eighteen (18) has suffered or

faces a threat of suffering a physical or mental wound, disability or condition of a nature that reasonably indicates abuse or neglect of a child to immediately report that knowledge or suspicion to the county children's services agency. If, during the course of a harassment investigation, the Compliance Officer or a designee has reason to believe or suspect that the alleged conduct reasonably indicates abuse or neglect of the Complainant, a report of such knowledge must be made in accordance with State law and Board Policy.

State law defines certain contact between a teacher and a student as "sexual battery." If the Compliance Officer or a designee has reason to believe that the Complainant has been the victim of criminal conduct as defined in Ohio's Criminal Code, such knowledge should be immediately reported to local law enforcement.

Any reports made to a county children's services agency or to local law enforcement shall not terminate the Compliance Officer or a designee's obligation and responsibility to continue to investigate a complaint of harassment. While the Compliance Officer or a designee may work cooperatively with outside agencies to conduct concurrent investigations, in no event shall the harassment investigation be inhibited by the involvement of outside agencies without good cause after consultation with the Superintendent.

Allegations Involving Conduct Unbecoming the Teaching Profession/Suspension

The Superintendent will report to the Ohio Department of Education, on forms provided for that purpose, matters of misconduct on the part of licensed professional staff members convicted of sexual battery, and will, in accordance with Policy 8141, suspend such employee from all duties that concern or involve the care, custody, or control of a child during the pendency of any criminal action for which that person has been arrested, summoned and/or indicted in that regard.

Education and Training

In support of this Anti-Harassment Policy, the Board promotes preventative educational measures to create greater awareness of unlawful discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training, as well as all information, provided regarding the Board's policy and harassment in general, will be age and content appropriate.

Retention of Investigatory Records and Materials

The Compliance Officer(s) is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include but not be limited to: all written reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy; any narratives that memorialize oral reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy; any documentation that memorializes the actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities related to the investigation and/or the District's response to the alleged violation of this policy; written witness statements; narratives, notes from, or audio, video, or digital recordings of witness interviews/statements; e-mails, texts, or social media posts that directly relate to or constitute evidence pertaining to an alleged violation of this policy (i.e., not after-the-fact commentary about or media coverage of the incident); notes or summaries prepared contemporaneously by the investigator in whatever form made (e.g., handwritten, keyed into a

computer or tablet, etc.), but not including transitory notes whose content is otherwise memorialized in other documents; written disciplinary sanctions issued to students or employees and other documentation that memorializes oral disciplinary sanctions issued to students or employees for violations of this policy; dated written determinations/reports (including summaries of relevant exculpatory and inculpatory evidence) and other documentation that memorializes oral notifications to the parties concerning the outcome of the investigation, including any consequences imposed as a result of a violation of this policy; documentation of any supportive measures offered and/or provided to the Complainant and/or the Respondent, including no contact orders issued to both parties, the dates the no contact orders were issued, and the dates the parties acknowledged receipt of the no contact orders; documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects; copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks); copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment; documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy; documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms; copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy; copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing; copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.

The documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal (e.g., FERPA, ADA) and/or State law (e.g., R.C. 3319.321) – e.g., student records and confidential medical records.

The documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

Revised 11/19/18

© Neola 2021

Legal

R.C. 4112.02

20 U.S.C. 1400 et seq., The Individuals with Disabilities Education Improvement Act of 2004 (IDEIA)

20 U.S.C. 1681 et seq.

29 U.S.C. 621 et seq., Age Discrimination in Employment Act of 1967

29 U.S.C. 794, Rehabilitation Act of 1973, as amended

29 U.S.C. 6101, The Age Discrimination Act of 1975

42 U.S.C. 2000d et seq.

42 U.S.C. 2000e et seq.

42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended

42 U.S.C. 1983

National School Boards Association Inquiry and Analysis - May, 2008

ACKNOWLEDGEMENT

I have received and read this handbook and understand the policies and procedures. I will abide by these policies, rules, and regulations as set forth by the Northern Career Institute. I am aware that the following document can be found online at www.ncioh.edu:

- The Northern Career Institute Student Handbook
- The Northern Career Institute Program Curriculum
- Willoughby-Eastlake City Schools District Policy
- Student Consumer Handbook
- The Jeanne Clery Act
- Emergency Safety & Information Handbook
- Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence

Print Name: _____

Student signature

Date