COMPLIANCE POLICY PROCEDURE CONDUCT ROADMAP

SHAMETRA MILLER, EDD
DIRECTOR OF EMPLOYEE RELATIONS
TITLE IX COORDINATOR
CONDUCT RELATED COMPLIANCE
COMPLIANCE POLICY

• The Alabama Institute for the Deaf and Blind is committed to ensuring that compliance is ingrained in all aspects of our operation. A comprehensive educational program will be provided to all employees upon orientation and annually thereafter. Each employee will be required to know what is expected of them regarding the program and to anticipate situations that could lead employees or others to violate these expectations.

• The effectiveness of the Compliance Program depends on each employee’s willingness to bring all compliance issues to the attention of their supervisor or director. If an employee is unsure whether a particular situation raises a compliance issue, they are instructed to report it.
OBJECTIVES

**Train**
The AIDB Compliance Office will train employees to identify and locate conduct-related policies and procedures adopted by AIDB, including its alignment with federal laws: Title VI, Title VII and Title IX.

**Review**
The AIDB Compliance Office will review the data collection practices of AIDB, as well as policies, procedures, and guidelines, to ensure maintenance regarding conduct-related compliance and the alignment of current federal regulations.

**Report**
The AIDB Compliance Office will provide quarterly reports to the Director of Human Resources and the President of AIDB based on communications from AIDB employees and new laws regarding conduct-related regulations and trends.
CONDUCT RELATED

Social Media

Drug Alcohol Testing

Ethics Commission

Title IX

Anti-Discrimination

Sexual Harassment

Equal Employment Opportunity

Digital Communication

Alabama Institute for Deaf and Blind

CONDUCT RELATED

- Staff-Student/Client Relationships
- Drug-Free & Alcohol-Free Workplace
- Safety and Security of Buildings
- Tobacco
- DHR
- Political Activities
- Weapons & Firearms
- Substance Abuse

Alabama Institute for Deaf and Blind
SOCIAL MEDIA

- AIDB Policy and Procedures Section GA
  - Personal Opinion
  - AIDB Employee- Disclaimer
  - Privacy and Protected Information
  - Legal or Political Issues
  - Freedom of Speech vs "Gripe" Session
  - Responsibility
• AIDB Policies and Procedures Section GB
• Personal Business
• Management
EQUAL EMPLOYMENT OPPORTUNITY

- AIDB Policies and Procedures Section GBA-P
  - Director of Human Resources
  - Recruitment
  - Promotions
  - Personnel Actions
    - Compensation
    - Benefits
    - Transfers
    - Trainings
    - Layoff
    - Social/recreation programs
SEXUAL HARASSMENT

- AIDB Policies and Procedures Section GBAA
- Title IX
  - Title IX of Education Amendments of 1972 and Title VII of Civil Rights Acts of 1964
    - Sexual Harassment Defined
      - Quid Pro Quo
      - Sexual Assault
        - Rape, Fondling, Statutory Rape, Incest, Dating/Domestic Violence, Stalking
      - Unwelcome Conduct/Hostile Environment
        - Severe- verbal, non-verbal, touching
        - Pervasive
        - Objectively Offensive
Title IX Grievance Process

The Title IX formal Title IX process includes:

1. **REPORT/COMPLAINT**
2. **INITIAL ASSESSMENT**
3. **FORMAL INVESTIGATION**
4. **DETERMINATION**
5. **APPEAL**

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**TITLE IX**

**AIDB POLICIES AND PROCEDURES SECTION GBAAAA**
ANTI-DISCRIMINATION

- AIDB Policies and Procedures Section GBAAA
  - Zero Tolerance
    - Prejudice
    - Harassment
    - Retaliation
    - Employment Decisions
    - Denial
ANTI-DISCRIMINATION PROCEDURES

Communicate with Offender

Report to Supervisor
- Supervisor will report to Director of Human Resources

Authority will initiate process for immediate investigation

Investigation reviewed by Executive Director and President for prompt & appropriate disciplinary action if warranted

Complainant will receive written response from the supervisor within 45 calendar days.
- Reports are placed in a confidential file in the Human Resources department.
ETHICS COMMISSIONS

- AIDB Policies and Procedures Section GBEA
  - Financial Disclosure Statements
DRUGS ALCOHOL TESTING

- AIDB Policies and Procedures Section GBEB
  - Omnibus Transportation Employee Testing Act of 1991
  - Enforcement
    - Random
    - Cooperation
    - Report Accidents
      - Alcohol screening (2) hours
      - Drug screening (6) hours
DRUG-FREE AND ALCOHOL-FREE WORKPLACE

- AIDB Policies and Procedures Section GBEC- Guidelines
  - Notify
  - Establish
  - Notify
  - Action
TOBACCO

• AIDB Policy Section GBED
  o K12 Programs
  o Adult Programs
STAFF-STUDENT/CLIENT RELATIONSHIPS

• AIDB Policies and Procedures Section GBEBB
  o Professional Conduct
  o Prohibited Behavior
    ▪ Sexual Conduct Any Type
    ▪ Physical Injury
    ▪ Emotional/Psychological Injury
    ▪ Concern and Reporting
EMPLOYEE CONDUCT IN STAFF/CLIENT RELATIONSHIPS

- AIDB Policies and Procedures Section GBEBB-P
  - Visitation in Staff Homes
  - Student Employment By Staff
  - Ethical vs Unethical
FIREARMS AND WEAPONS

A weapon is defined as any object, device or instrument designed as a weapon or through its use is capable of threatening or producing bodily harm or which may be used to inflict self-injury, including but not limited to any firearm, handgun or long gun, i.e., sport rifles and shotguns used for hunting, whether loaded or unloaded; air guns; pellet guns; BB guns; explosives; fireworks; mace and other propellants; stun guns; tasers; ammunition; poisons; hand grenade, missile, incendiary device; switchblade knife, gravity knife, stiletto, sword, dagger; any club, baton, billy, black-jack, bludgeon or metal knuckles; and other objects that have been modified to serve as a weapon.

- AIDB Policy Section GBEE
- Gun-Free Schools ACT of 1994 and related Alabama State Laws
STAFF POLITICAL ACTIVITIES

- Non-Candidate Activity
- Qualifying as a Candidate for an Elected Public Office
- Campaigning for Election to a Public Office
- Election of Appointment to Public Office

AIDB Policy Section GBI
DEPARTMENT OF HUMAN RESOURCES

PSYCHOLOGY DEPARTMENT

• The staff member who witnesses or receives the information firsthand reports to his or her immediate supervisor and the Department of Human Resources (DHR). Once a report has been made to DHR, all investigation should cease except those required or permitted by Title IX regulations.

• The immediate supervisor should then contact the Family and Community Engagement Specialist (FACE Specialist). The FACE Specialist will assist with written and verbal reporting if needed.

• The FACE Specialist will notify those with legitimate education interest (L.E.I.).

• If the incident is related to sexual misconduct or harassment, the FACE Specialist will inform the Title IX Coordinator promptly.

• The school administrator or designee will notify parents/guardians of the DHR report. If parent has additional questions the administrator or designee will inform parents that the FACE Specialist will make contact, then inform FACE Specialist of request.

FACE SPECIALIST

• The written copy of the report and any follow up documentation will be kept and filed with the FACE Specialist. The FACE specialist will keep a log of DHR reports, statuses, and county transfers (updates will be logged within 30 days of initial report). LEI will be notified of all updates.

• The Psychology Department Technician will coordinate DHR interviews, interpreting services, appointment times and meetings, locations and collaborate with DHR regarding follow up. DHR workers arriving on campus to conduct interviews with students will check in at the Dowling Building at the Admissions Office. Interviews will occur in the Dowling Building for confidentiality purposes, unless otherwise noted.

• The FACE Specialist will communicate with the director or principal who is directly involved with the student when the need arises.

• Once the DHR caseworker communicates to the FACE Specialist the investigation is complete and the case has been closed, it is the responsibility of the FACE Specialist to provide to the LEI pertinent information related to the closure of the case.

• AIDB personnel other than the Title IX Coordinator or his or her designee are prohibited from conducting individual investigations/interviews. Safety and Security will assist as needed.
SAFETY AND SECURITY

- Badge Access
TRAINING OPPORTUNITIES AND REPORTING

- Annual
- New Employee Orientation
- Quarterly
Any member of the AIDB Community who wishes to report violations or discuss ethical concerns may do so by emailing compliance@aidb.org.

- Ext 351
- miller.shametra@aidb.org
QUESTIONS

• Thank You