

## **Great Hearts Texas Title IX Grievance Process**

### **Great Hearts Texas Title IX Statement**

Great Hearts Texas prohibits discrimination on the basis of sex in any educational program or activity and responds promptly and equitably to reports of sex discrimination and sexual harassment in accordance with Title IX of the Education Amendments of 1972 and applicable federal regulations. This grievance process is intended to provide a fair, reliable, and impartial process for addressing reports and formal complaints of conduct prohibited under Title IX.

### **Reporting Concerns**

Any student, parent, employee, or third party may report conduct that may constitute sex discrimination or sexual harassment under Title IX. Reports may be made in person, by mail, by telephone, by email, or by any other method that results in the district receiving verbal or written notice of the concern. Reports may be made at any time, including outside normal business hours.

Reports may be made to a campus administrator or directly to the District Title IX Coordinator. Great Hearts Texas will respond promptly when it has actual knowledge of conduct that may constitute sexual harassment or sex discrimination under Title IX.

### **Title IX Coordinator**

The District has designated at least one Title IX Coordinator to oversee District compliance with Title IX, coordinate responses to reports and complaints, implement supportive measures, and oversee the grievance process. Contact information for the Title IX Coordinator, including name or title, office address, telephone number, and email address, is published on the District website and in District handbooks.

- The Title IX Coordinator, for concerns regarding sex-based discrimination is:  
Brandon Aniol  
Senior Manager of Governance and Compliance  
Great Hearts Texas 310 W. Ashby Pl., San Antonio, TX 78212  
[brandon.aniol@greatheartstxschools.org](mailto:brandon.aniol@greatheartstxschools.org)  
(210) 888-9475

### **Initial Assessment**

Upon receiving a report, the Title IX Coordinator will conduct an initial assessment to determine:

- Whether the alleged conduct could constitute sexual harassment or sex discrimination under Title IX;
- Whether the conduct occurred within Great Hearts Texas's education program or activity;
- Whether supportive measures are appropriate; and
- Whether the matter may proceed through a formal Title IX grievance process, informal resolution, or another applicable District policy or student disciplinary process.

Conduct that does not meet Title IX definitions or jurisdictional requirements may still be addressed under other District policies, including the Student Code of Conduct, bullying policies, employee conduct policies, or other applicable procedures.

### **Supportive Measures**

Great Hearts Texas may offer supportive measures to complainants and respondents regardless of whether a formal complaint is filed. Supportive measures are individualized, non-disciplinary, non-punitive services designed to restore or preserve equal access to the educational environment, protect safety, or deter prohibited conduct. Supportive measures will be implemented on a confidential and need-to-know basis to the extent permitted by law.

### **Formal Complaints**

A formal complaint is a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the district investigate the allegations. Parents or guardians may act on behalf of a minor student during the grievance process. The Title IX Coordinator may also initiate a formal complaint when necessary to address safety concerns or preserve equal access to the educational environment.

Great Hearts Texas must dismiss a formal complaint for Title IX purposes if the alleged conduct:

- Would not constitute sexual harassment under Title IX even if proven;
- Did not occur within the district's education program or activity; or
- Did not occur against a person in the United States.

Great Hearts Texas may also dismiss a formal complaint if:

- The complainant withdraws the complaint in writing;
- The respondent is no longer enrolled in or employed by the district; or
- Specific circumstances prevent the district from gathering sufficient evidence to reach a determination.

Dismissal from the Title IX process does not prevent the Great Hearts Texas from addressing the conduct under another district policy or procedure.

### **Written Notice of Allegations**

If a formal complaint proceeds, Great Hearts Texas will provide written notice to the parties including:

- The allegations under review;
- The identities of the parties, if known;
- The date and location of the alleged conduct, if known;
- A summary of the grievance procedures;
- Notice that the respondent is presumed not responsible unless and until a determination is made; and
- Notice that parties may have an advisor of their choice, including an attorney.

### **Emergency Removal**

Great Hearts Texas may temporarily remove a respondent from a program or activity following an individualized safety and risk analysis when the district determines that an immediate threat to the physical health or safety of a student or other individual exists. The respondent will receive notice of the removal and an opportunity to challenge the decision.

### **Informal Resolution**

When appropriate and permitted by law, Great Hearts Texas may offer an informal resolution process after a formal complaint has been filed. Informal resolution may include mediation, restorative practices, or other agreed-upon measures. Participation is voluntary, requires written consent from both parties, and either party may withdraw at any time before a final agreement is reached. Informal resolution will not be used to resolve allegations that an employee sexually harassed a student.

### **Investigation Process**

Great Hearts Texas will conduct a prompt, fair, and impartial investigation by trained personnel free from conflicts of interest or bias. The burden of gathering evidence and reaching a determination rests with the district and not with the parties. Both parties will have an equal opportunity to:

- Present witnesses and evidence;
- Provide inculpatory or exculpatory information;
- Review evidence gathered during the investigation; and
- Be accompanied by an advisor of their choice.

Great Hearts Texas will objectively evaluate all relevant evidence and will not make credibility determinations based solely on a person's status as a complainant, respondent, or witness. The district uses the preponderance of the evidence standard when determining responsibility under Title IX. K-12 open-enrollment charter schools are not required to conduct live hearings with cross-examination, and the district has elected not to use live hearings in its grievance process.

Before completion of the investigative report, both parties and their advisors, if any, will receive an opportunity to inspect and review evidence directly related to the allegations and submit a written response within the timeline established by the district. After reviewing party responses, the investigator will prepare a written investigative report summarizing:

- The allegations;
- Procedural history;
- Relevant evidence;
- Witness interviews; and
- Applicable policies and evidentiary standards.

### **Written Determination**

A trained decision-maker who was not the investigator or Title IX Coordinator for the matter will review the investigative report and issue a written determination regarding responsibility. The written determination will include:

- Findings of fact;
- Application of District policy to the facts;
- Conclusions regarding responsibility;
- Any disciplinary sanctions or remedies, if applicable; and
- Information regarding appeal rights.

### **Appeals**

Either party may appeal:

- A determination regarding responsibility; or

- A dismissal of a formal complaint or allegation.

Appeals may be based on:

- Procedural irregularity affecting the outcome;
- Newly discovered evidence not reasonably available at the time of determination; or
- Conflict of interest or bias affecting the outcome.

Appeal decisions will be provided simultaneously to both parties in writing.

### **Retaliation Prohibited**

Retaliation against any person for reporting concerns, participating in a grievance process, serving as a witness, or exercising rights protected by Title IX is strictly prohibited. Concerns regarding retaliation should be reported immediately to the district.

### **Recordkeeping and Confidentiality**

Great Hearts Texas will maintain records related to Title IX reports, investigations, supportive measures, determinations, appeals, informal resolutions, and training materials in accordance with law and federal recordkeeping requirements. The district will respect privacy interests to the extent permitted by law but cannot guarantee absolute confidentiality during the grievance process.

### **Commitment to Training**

Great Hearts Texas employees receive training consistent with federal and state requirements regarding:

- Title IX (Sex-Based Discrimination and Harassment)
- Section 504 of the Rehabilitation Act
- Americans with Disabilities Act
- FERPA (student record confidentiality)
- bullying prevention and intervention
- dating violence awareness
- non-retaliation protections.

Training is tailored to employee roles and includes instruction on reporting obligations, confidentiality limitations, and procedural safeguards.

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