	POLICY	Motion No.	EXEC 1012-2026
PENNSYLVANIA HIGHLANDS COMMUNITY COLLEGE	**Title IX: Non-Discrimination, Harassment, and Retaliation on the Basis of Sex**	Effective Date	10/20/2026
		Responsible Department	Student Services/Safety & Security/Human Resources
		Attorney Review / Date	N/A

Pennsylvania Highlands Community College
Title IX Policy: Non-Discrimination, Harassment, Retaliation on the Basis of Sex

Rationale for Policy

Pennsylvania Highlands Community College is committed to providing a workplace and educational environment, as well as other benefits, programs, and activities, that are free from discrimination, harassment, and retaliation. To ensure compliance with federal and state civil rights laws and regulations, and to affirm its commitment to promoting the goals of fairness and equity in all aspects of the educational program or activity, Pennsylvania Highlands Community College has developed internal policies and procedures that provide a prompt, fair, and impartial process for those involved in an allegation of discrimination or harassment on the basis of sex, and for allegations of retaliation.

Pennsylvania Highlands Community College values and upholds the equal dignity of all members of its community and strives to balance the rights of the parties in the grievance process during what is often a difficult time for all those involved.

This policy shall be interpreted and applied consistent with applicable federal law and Title IX regulations which may be amended from time to time.

Applicable Scope

The core purpose of this policy is the prohibition of discrimination on the basis of sex. Sometimes discrimination involves exclusion from activities, such as admission, athletics, or employment. In the case of sex-based discrimination, this can encompass discrimination on the basis of pregnancy, childbirth, termination of pregnancy, lactation, recovery from pregnancy, and related medical conditions, as well as sexual harassment, sexual assault, stalking, sexual exploitation, dating violence, and domestic violence.

The policies of Pennsylvania Highlands Community College are written and interpreted broadly to include online and cyber manifestations of any of the prohibited behaviors. The Pennsylvania Highlands Community College's resolution process will be utilized for alleged violations of the Policy on Non- Discrimination, Harassment, Retaliation on the Basis of Sex.

When the Respondent is a member of the Pennsylvania Highlands Community College community, a grievance process may be available regardless of the status of the Complainant, who may or may not be a member of the Pennsylvania Highlands Community College community. This College community includes, but is not limited to, students, student organizations, faculty, administrators, and staff. Visitors are not part of the college community; however, they are both protected by and expected to abide by this policy. The procedures below may be applied to incidents, to patterns, and/or to the campus climate, all of which may be addressed and investigated in accordance with this policy.

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

- *Complainant* means an individual who is alleged to be the victim of conduct that could constitute harassment or discrimination on the basis of sex; or retaliation for engaging in a protected activity.
- *Respondent* means an individual who has been reported to be the perpetrator of conduct that could constitute harassment or discrimination on the basis of sex; or retaliation for engaging in a protected activity.

Title IX contact information

1) Title IX Coordinator

The Title IX Coordinator oversees implementation of the Pennsylvania Highlands Community College's policy on Non-Discrimination, Harassment, Retaliation on the Basis of Sex and acts as the and ADA/504 Coordinator.

The Title IX Coordinator has the primary responsibility for coordinating Pennsylvania Highlands Community College's efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy.

To raise any concern involving bias, conflict of interest, misconduct, or discrimination by the Title IX Coordinator, contact the Pennsylvania Highlands Community College President, at 814-262-3820 or via email at president@pennhighlands.edu. Concerns involving bias, conflict of interest, misconduct, or discrimination by any other Title IX Team member should be raised with the Title IX Coordinator.

2) Administrative Contact Information

Complaints or notice of alleged policy violations, or inquiries about/concerns regarding this policy and procedures, may be made internally to:

Title IX Coordinator
Pennsylvania Highlands Community College
101 Community College Way
Johnstown, PA 15904
Phone: 814.262.6494
Email: TitleIXCoord@pennhighlands.edu

Pennsylvania Highlands Community College has also classified all employees as Mandated Reporters of any knowledge they have that a member of the college community is experiencing harassment, discrimination, and/or retaliation under this policy. The section below on Mandated Reporting details which employees have this responsibility and their duties, accordingly.

3) Complaints may also be discussed with the following:

Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-1100
Customer Service Hotline #: (800) 421-3481
Facsimile: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: http://www.ed.gov/ocr

For complaints involving employees:

Pittsburgh Office of the Equal Employment Opportunity Commission
William S. Moorhead Federal Building
1000 Liberty Avenue, Suite 1112
Pittsburgh, PA 15222
Phone: 1.800.669.4000
Fax: 1.412.395.5749
info@eeoc.gov

4) How to report/file a complaint

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

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

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

a. File a complaint with, or give verbal notice to, the Title IX Coordinator, Title IX Investigator, and/or Title IX Deputy Coordinators.

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

b. Report online, using the reporting options posted at: https://www.pennhighlands.edu/student-life/security-safety/report-an-incidentconcern/

   Anonymous reports are accepted using these options. Pennsylvania Highlands Community College tries to provide supportive measures to all Complainants, which is impossible with an anonymous report. Because reporting carries no obligation to initiate a formal response, and as the Pennsylvania Highlands Community College respects Complainant requests to dismiss complaints unless there is a compelling threat to health and/or safety, the Complainant is largely in control and should not fear a loss of privacy by making a report that allows the Pennsylvania Highlands Community College to discuss and/or provide supportive measures.

c. Report using the reporting hotline at 1.800.401.8004.

A formal complaint means a document filed/signed by the Complainant or signed by the Title IX Coordinator alleging a policy violation by a Respondent and requesting that the Pennsylvania Highlands Community College investigate the allegation(s). As used in this paragraph, the phrase "document filed by a Complainant" means a document or electronic submission (such as by electronic mail or through an online portal provided for this purpose by the Pennsylvania Highlands Community College) that contains the Complainant's physical or digital signature or otherwise indicates that the Complainant is the person filing the complaint.

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

Mandated Reporting

All Pennsylvania Highlands Community College employees (faculty, staff, administrators) are required to report actual or suspected discrimination or harassment to appropriate officials immediately, though there are some limited exceptions.

If a Complainant expects formal action in response to their allegations, reporting to any Mandated Reporter can connect them with resources to report crimes and/or policy violations, and these employees will immediately pass reports to the Title IX Coordinator (and/or police, if desired by the Complainant), who will take action when an incident is reported to them.

The following sections describe the reporting options at Pennsylvania Highlands Community College for a Complainant or third-party (including parents/guardians when appropriate):

1. Confidential Resources

If a Complainant would like the details of an incident to be kept confidential, the Complainant may speak with:

- Pennsylvania Highlands Community College Counselor located in the Student Success Center, Richland Campus 814-262-6451
- Off-campus counselor (non-employees)
- Licensed professional counselors and other medical providers
- Local rape crisis counselors
- Domestic violence resources
- Local or state assistance agencies
- Clergy/Chaplains
- Attorneys

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

Campus counselors are available to help free of charge and may be consulted on an emergency basis during normal business hours.

2. Mandated Reporters and Formal Notice/Complaints

All employees of Pennsylvania Highlands Community College (including student employees), with the exception of those who are designated as Confidential Resources, are Mandated Reporters and must promptly share with the Title IX Coordinator all known details of a report made to them in the course of their employment.

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

Failure of a Mandated Reporter, as described above in this section, to report an incident of harassment or discrimination of which they become aware is a violation of Pennsylvania Highlands Community College policy and can be subject to disciplinary action for failure to comply.

Finally, it is important to clarify that a Mandated Reporter who is themselves a target of harassment or other misconduct under this policy is not required to report their own experience, though they are, of course, encouraged to do so.

Supportive Measures

Pennsylvania Highlands Community College will offer and implement appropriate and reasonable supportive measures to all parties upon notice of alleged harassment, discrimination, and/or retaliation.

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the Pennsylvania Highlands Community College's education program or activity, including measures designed to protect the safety of all parties or Pennsylvania Highlands Community College's educational environment, and/or deter harassment, discrimination, and/or retaliation.

Promptness

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

Privacy

Every effort is made by Pennsylvania Highlands Community College to preserve the privacy of reports. Pennsylvania Highlands Community College will not share the identity of any individual who has made a report or complaint of harassment, discrimination, or retaliation; any

Complainant, any Respondent, or any witness, except as permitted by the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g; FERPA regulations, 34 CFR part 99; or as required by law; or to carry out the purposes of 34 CFR Part 106, including the conducting of any investigation, hearing, or grievance proceeding arising under these policies and procedures.

Jurisdiction

This policy applies to the educational programs and activities of Pennsylvania Highlands Community College, to conduct that takes place on the campus or on property owned or controlled by Pennsylvania Highlands Community College, at Pennsylvania Highlands Community College-sponsored events, or in buildings owned or controlled by Pennsylvania Highlands Community College's recognized student organizations. The Respondent must be a member of Pennsylvania Highlands Community College's community for its policies to apply.

Pennsylvania Highlands Community College may also extend jurisdiction to off-campus and/or to online conduct when the Title IX Coordinator determines that the conduct affects a substantial Pennsylvania Highlands Community College interest.

Free Expression and Academic Freedom

Students, staff, administrators, and faculty are entitled to an employment and educational environment that is free of discriminatory harassment. Pennsylvania Highlands Community College's Non-Discrimination, Harassment, Retaliation on the Basis of Sex policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive subject matters protected by academic freedom.

The sections below describe the specific forms of legally prohibited harassment that are also prohibited under Pennsylvania Highlands Community College Non-Discrimination, Harassment, Retaliation on the Basis of Sex policy. When speech or conduct is protected by academic freedom and/or the First Amendment, it will not be considered a violation of Pennsylvania Highlands Community College policy, though supportive measures will be offered to those impacted.

1. **Discriminatory Harassment**

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

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

   When discriminatory harassment rises to the level of creating a hostile environment, Pennsylvania Highlands Community College may also impose sanctions on the Respondent through application of the Non-discrimination, Harassment, Retaliation on the Basis of Sex grievance process.

2. **Sexual Harassment**

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

   Based on the requirements of the regulatory bodies listed above, Pennsylvania Highlands Community College has adopted the following definition of Sexual Harassment in order to address the unique environment of an academic community, which consists not only of employer and employees, but of students as well.

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

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

a. Conduct on the basis of sex that satisfies one or more of the following:

   i. Quid Pro Quo:

      1. an employee of the Pennsylvania Highlands Community College, conditions the provision of an aid, benefit, or service of the Pennsylvania Highlands Community College, on an individual's participation in unwelcome sexual conduct; and/or

   ii. Sexual Harassment:

      1. unwelcome conduct, determined by a reasonable person, to be so severe, and pervasive, and, objectively offensive, that it effectively denies a person equal access to Pennsylvania Highlands Community College's education program or activity.

   iii. Sexual assault, including:

      1. Sex Offenses, Forcible
      2. Forcible Rape
      3. Forcible Sodomy
      4. Sexual Assault with an Object
      5. Criminal Sexual Contact
      6. Sex Offenses, Non-forcible
         a) Incest
         b) Statutory Rape

3. Dating Violence, defined as:

Violence, on the basis of sex, committed by a person, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.

The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

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

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

4. Domestic Violence, defined as:

A pattern of behavior involving the use or attempted use of physical, sexual, verbal, psychological, economic, or technological abuse, or any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, by a person who is:

- a current or former spouse or dating partner of the Complainant or other person similarly situated to a spouse of the victim, or
- a person with whom the Complainant shares a child in common, or
- a person who is cohabiting with, or has cohabitated with, the Complainant as a spouse or dating partner, or
- an adult family member of, or paid or unpaid caregiver in an ongoing relationship of trust with, a Complainant aged 50 or older or an adult Complainant with disabilities, or
- a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Pennsylvania, or

any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Pennsylvania.

5. Stalking, defined as:

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

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

For the purposes of this definition,

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

Consensual Relationships

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

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

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

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

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

Consent

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

Consent is:

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

*The Commonwealth of Pennsylvania does not specifically define "consent."

Force

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

Coercion

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

Incapacitation

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

Retaliation

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

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

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

Amnesty for Complainants and Witnesses

The Pennsylvania Highlands Community College community encourages the reporting of misconduct and crimes by Complainants and witnesses. To encourage reporting and participation in the process, Pennsylvania Highlands Community College maintains a policy of offering parties and witnesses amnesty from minor policy violations – such as underage consumption of alcohol or the use of illicit drugs – related to the incident.

Additionally, Pennsylvania Highlands Community College maintains a policy of amnesty for students who offer help to others in need. While policy violations cannot be overlooked, the Pennsylvania Highlands Community College may provide purely educational options with no official disciplinary finding, rather than punitive sanctions, to those who offer their assistance to others in need.

Formal Resolution Process

Pennsylvania Highlands has established procedures consistent with applicable Title IX regulations, including 34 CFR Part 106.45. These processes/procedures can be further reviewed at this link:

https://www.pennhighlands.edu/title-ix-policy/

or by contacting the Title IX Coordinator.

Burden of proof

Burden of proof refers to whom has the responsibility of showing a violation has occurred. It is always the responsibility of Pennsylvania Highlands Community College to satisfy the burden

of proof. The respondent does not have the burden to prove that a violation did not occur.

Standard of Proof

Pennsylvania Highlands Community College uses the preponderance of the evidence standard in investigations of complaints alleging violations of this policy and any related violations.

This means that the investigation determines whether it is more likely than not that a violation of the policy occurred.

Resolution following notice and/or filing of formal complaint

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

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

Pennsylvania Highlands Community College will initiate at least one of three responses:

1. Offering supportive measures because the Complainant does not want to proceed formally; and/or
2. An informal resolution; and/or
3. A Formal Grievance Process including an investigation and a hearing.

- If an informal resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for informal resolution and may seek to determine if the Respondent is also willing to engage in informal resolution.

  Informal Resolution can include three different approaches:

  1) When the parties agree to resolve the matter through an alternate resolution mechanism;
  2) When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the resolution process; or
  3) When the Title IX Coordinator can resolve the matter informally by providing supportive measures to remedy the situation.

- If a Formal Grievance Process is preferred, the Title IX Coordinator determines if the alleged misconduct falls within the scope of Title IX. If it does, the Title IX Coordinator will initiate the formal investigation and grievance process, directing the investigation to address an incident, and/or a pattern of alleged misconduct, and/or a culture/climate issue, based on the nature of the complaint.

  This process will include:

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

Please review the Pennsylvania Highlands Community College *resolution process* for alleged violations of the Policy on Non-Discrimination, Harassment, Retaliation on the Basis of Sex found at https://www.pennhighlands.edu/title-ix-policy/ or by contacting the Title IX Coordinator.

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

If it does not, the Title IX Coordinator determines that Title IX does not apply and will "dismiss" that aspect of the complaint and assesses which policies may apply. Dismissing a complaint under Title IX is procedural and does not limit Pennsylvania Highlands Community College's authority to address a complaint with the appropriate process and remedies.

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

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

Sanctioning

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

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

Student sanctions may include:

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

Employee sanctions may include:

- Warning – Verbal or Written
- Performance Improvement/Management Process
- Required Counseling
- Required Training or Education
- Probation
- Demotion
- Administrative leave (suspension) with pay or without pay
- Termination

Appeals

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

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

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

Record Keeping

Pennsylvania Highlands Community College will maintain for a period of seven years, records of:

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

Pennsylvania Highlands Community College will also maintain any and all records in accordance with state and federal laws.

Process/Procedures can be found on our website at: https://www.pennhighlands.edu/title-ix-policy/

Effective Date	Policy Number	Document Author	Description of Change
10/20/26	EXEC 1013-2026	Student Services/Safety & Security/Human Resources	Revisions to comply with federal and state regulations
04/21/26	EXEC 1005-2026	Student Services/Safety & Security/Human Resources	Contact Information Updated
10/21/25	EXEC 1014-2025	Student Services/Safety & Security/Human Resources	Changes to ensure accuracy and alignment with institutional roles and federal standards
08/16/2022	EXEC 1016-2022	Student Services/Safety & Security/Human Resources	Revised definition of "domestic violence'
08/18/2020	EXEC 1012-2020	Student Services/Safety & Security/Human Resources	Complete policy change due to federal guidelines
05/09/16			Title Changes
12/11/2012	EXEC 1031 - 2012	April Renzi / Trish Corle	Initial Release