

9. To insure that the position of Word of Life will be maintained in an uncompromising manner and believing that a consistent and exemplary life should be expected of those who undertake the instruction and guidance of Christian youth, it is required that associates shall individually affirm by signing the following at the time of initial association and shall so reaffirm at such time as determined by Word of Life.

III. GRIEVANCE POLICY

We believe that the first step in resolving any dispute, whether interpersonal or organizational, is to invoke the principles outlined in Mathew 18 and to directly address the party (or office) with whom a problem has arisen in order to seek a resolution. It is our sincere hope that as two believers openly seek the mind of the Lord in regards to their concerns, the Holy Spirit will bring peace to the situation. As this may not always be the case, human intervention may at times be required.

If, in spite of all sincere attempts, a matter remains unresolved, the next step may be to file a formal grievance. A form for such purpose is available from and should be submitted to the Associate Executive Dean in Schroon Lake, New York who will address the matter with all appropriate personnel within 14 days. Every effort will be made to resolve all issues in writing within 30 days or less. One must recognize that solutions may not be deemed satisfactory by all concerned parties. However, the administration will seek a resolution that is fair, practical, and based on the authority of Scripture.

If after following through on the above, a student believes his/her grievances were not satisfactorily addressed by the administration of the Word of Life Bible Institute, he or she may contact the Transnational Association of Christian Colleges and Schools (TRACS) at: 15935 Forest Rd., Forest, VA 24551, or by telephone at (434) 525-9539. tracs.org

IV. CONFIDENTIALITY OF STUDENT RECORDS (FERPA)

Privacy Information

The Family Educational Rights and Privacy Act of 1974 and its amendments give schools clear guidelines on the privacy of student records. This notice is given to inform you of your rights as a student and to help you understand how to access and disclose information from your educational records.

Definitions

- Educational Records: With certain exceptions, educational records are those records, files, documents and other materials that contain information directly related to the student and are maintained by an employee or representative of the school.
- School Official: A person employed by Word of Life Bible Institute in an administrative, academic, research, or support staff position; a member of the board of directors; or a student serving in an administrative support role or on an official committee, such as a disciplinary or grievance committee.
- Legitimate Educational Interest: A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for Word of Life Bible Institute.
- Directory (public) Information: In accordance with the Act, Word of Life Bible Institute designates the following information as directory information: student name, address (home, current and email), telephone (home and current), photo, student ID, program of study, awards, recent school attended, enrollment status, dates of attendance, participation in official organizations and sports, and height and weight of sports team members.

Students' rights under FERPA

1. You have the right, with certain exceptions, to inspect your educational records. Requests should be made to the Registrar's office or to the Associate Executive Dean's office and will be granted within a reasonable timeframe not to exceed 45 days from the original request.
2. You have the right to request the amendment of your educational record that you believe is inaccurate, misleading or otherwise in violation of your privacy rights under FERPA. You must make a written request including signature and date to the Registrar's office or to the Associate Executive Dean's office for an amendment to be considered. Additional information regarding the request process will be provided to you at the time the initial request is made.

3. You have the right to provide written consent before the Bible Institute discloses elements of your educational records except to the extent that FERPA authorizes disclosure without consent. The Bible Institute may disclose information without consent to school officials with legitimate educational interest and information that Word of Life has identified as directory information. A complete list of FERPA allowable disclosures without consent may be obtained from the Registrar's office or the Associate Executive Dean's office
4. You have the right to withhold the disclosure of directory information. If you exercise this right, Word of Life Bible Institute will not disclose any directory information to parties that may be seeking this information without your written consent. Withholding of this information may cause delays in maintaining insurance coverage and applying for transfer to other institutions and must be exercised with great caution. Written requests to opt out of directory information disclosure must be made to the Registrar's office or to the Associate Executive Dean's office.
5. You have the right to file a complaint with the US Department of Education concerning alleged failures by Word of Life Bible Institute to comply with the requirements of FERPA. Complaints should be sent to:

Family Policy Compliance Office
US Department of Education
400 Maryland Ave SW
Washington DC 20202

V. TITLE IX POLICY

Word of Life Bible Institute is committed to providing a safe environment free from discrimination. We believe that all people are created in the image of God and are equal. With this in mind, the Bible Institute does not discriminate on the basis of sex in our education programs or activities including recruitment, admissions, distribution of financial assistance, hiring practices, employment or promotion. This echoes Title IX of the Education Act which states:

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

The following seeks to clearly define terms and set forth policies to educate our campus community and help ensure that our campus remains a safe environment for all to learn and grow in their walk with the Lord. The Bible Institute has designated the following individuals to coordinate our efforts in this area:

Mr. Adam Cook
Title IX Coordinator & Registrar
4200 Glendale Rd
Administrative Building
(518) 494-1454 | adamcook@wol.org

Mrs. Karen Smith
Title IX Investigator & Dean of Women
4200 Glendale Rd
Main Administration Building
(518) 494-1476 | karensmith@wol.org

Mrs. Alyssa Webber
Title IX Investigator & Service Assignments Coordinator
4200 Glendale Rd
Ministries Center
(518) 494-1538 | alyssawebber@wol.org

Definitions

Title IX Coordinator: An employee of the school designated to ensure compliance with Title IX regulations and investigate all allegations of sex discrimination.

Sex Discrimination: Discrimination in employment, admission, and/or participation in sports or school organizations on the basis of one's sex. Under Title IX, sex discrimination also includes, but is not limited to, any type of sexual harassment, sexual violence and sexual assault.

Sexual Harassment: Includes, but is not limited to, unwelcome sexual advances, requests for sexual acts or favors, insulting or degrading remarks or conduct, any other unwelcome statements or actions based on sex that are sufficiently severe or pervasive so as to unreasonably interfere with an individual's education, work performance, or create an intimidating, hostile or offensive environment.

Sexual Violence: Any sex act committed against a person's will or where the person is incapable of giving consent.

Sexual Assault: Any type of sexual contact or behavior that occurs without the explicit consent of the recipient.

Sexual Contact: The intentional touching of a person's intimate parts (including genitalia, groin, buttocks or breasts) or the clothing immediately covering a person's intimate parts for the purpose of sexual gratification or using force to cause a person to touch his or her own or another person's intimate parts.

Consent: All school standards prohibit sexual contact outside of marriage. In addition, sexual activity requires consent from both parties involved as a matter of state and federal law. Consent must be voluntary, clear and unambiguous between both parties. Consent cannot be obtained from someone who is a minor, asleep, unconscious or otherwise mentally or physically incapacitated. Consent cannot be given under coercion, threat or force.

Complainant: A student, employee or other school community member who considers filing or files a complaint regarding sex discrimination.

Respondent: A person alleged to have committed a violation of the school's policy regarding sex discrimination.

Mediation: In certain instances a complainant may choose to have the Title IX coordinator mediate a peaceful resolution to certain sex discrimination allegations between the complainant and the respondent before an official Title IX complaint is filed. This is the choice of the complainant and cannot be forced by the school. In cases involving sexual violence or sexual assault, mediation is not appropriate and a full Title IX investigation will be opened even if mediation is requested.

Confidentiality

Parties who wish to submit a confidential complaint of sex based discrimination, harassment, violence or assault which does not include the complainant's name must know that this may limit the institution's ability to fully resolve the complaint. Complainants should know that the Bible Institute will take necessary measures to protect the complainant from retaliation on the basis of making a complaint and will put measures in place to allow the complainant to continue to work or study in a safe and supportive environment without the threat of retaliation or further discrimination. A full complaint will still be handled with the utmost of care but will allow the Bible Institute to completely investigate the complaint and issue sanctions against the respondent if a violation of this policy is found. Staff, including resident assistants, are responsible to report all claims of sex based discrimination to the Title IX coordinator while maintaining confidentiality, if requested.

Discrimination and Harassment

If an individual believes that they have been denied admission, employment, or participation in a school program or sport based on their sex or has experienced sexual harassment as defined above, they should contact the Title IX Coordinator immediately. The Title IX coordinator will discuss the nature of the discrimination with the complainant, provide the complainant with a copy of the Title IX policy, and help the complainant understand the investigation and resolution process. If desired, the complainant may elect to have the Title IX coordinator act as a mediator to bring peaceful resolution to the situation, or to forgo mediation at any time and file an official Title IX complaint.

If a complaint is filed, the Title IX Coordinator will open an official investigation. During the investigation, measures may be put in place to ensure the complainant is able to continue their education or employment without threat of reprisal or intimidation as a result of the complaint. Both the complainant and the respondent will be able to submit evidence and produce a list of witnesses that may be able to support their claims. The Title IX Coordinator will report the findings of the investigation to the Dean of Students (in the case of a student or third party) or Human Resources Manager (in the case of an employee or contractor) in the most prudent time frame possible, generally within 60 days of the complaint, for action. Findings will be based on the preponderance of the evidence standard. Once a course of action is determined, the outcome will be officially communicated to the complainant and the respondent in writing. Both parties involved have the right to appeal the decision. Appeals will be considered by the Executive Dean, must be submitted within 15 days of the written notification, and will be based on one of the following factors:

- 1) Procedural misconduct during the investigation.
- 2) The discipline does not seem to match the infraction.

- 3) New evidence, which was not previously available during the investigation, which may shed new light on the investigative findings.

Disciplinary action may be suspended during the hearing of the appeal at the discretion of the Executive Dean in consideration of the safety of the campus community. Appropriate measures will be taken during the appeal process to ensure an environment free of sexual discrimination and retaliation during the appeal process. In the case of an appeal, a final decision will be issued in writing to both the complainant and the respondent.

Sexual Violence and Sexual Assault

If a student or employee is the victim of sexual violence or sexual assault, they should seek medical attention immediately to ensure their personal safety and to help aid any future investigations. Once their safety is secured and they have been treated for any medical injuries sustained, the victim should not hesitate to contact a member of the school's Student Life Department or the Title IX Coordinator to report the crime, regardless of the circumstances. If any student, staff member, or other member of the school community is made aware of sexual violence or sexual assault, they should report it to the Title IX Coordinator immediately.

Once a report has been made, the Title IX Coordinator will put measures in place to secure the complainant's safety and ensure that they are able to continue with their school or employment. If accommodations need to be made, the Title IX Coordinator will work with the Student Life, Academic and Ministries departments to ensure that appropriate accommodations for transitioning back into campus life are put into place.

The Title IX Coordinator will investigate the complaint independent of any external law enforcement investigations that may be ongoing. Title IX investigators may need to postpone the investigation until law enforcement has concluded the evidence gathering portion of their investigation, but will resume the investigation as quickly as possible. Both the complainant and the respondent will be able to submit evidence and produce a list of witnesses that may be able to support their claims. The Title IX Coordinator will report the findings of the investigation to the Dean of Students (in the case of a student or third party) or Human Resources Manager (in the case of an employee or contractor) in the most prudent time frame possible, generally within 60 days of the complaint, for action. Findings will be based on the preponderance of the evidence standard. Once a course of action is determined, the outcome will be officially communicated to the complainant and the respondent in writing. Both parties involved have the right to appeal the decision. Appeals will be considered by the Executive Dean, must be submitted within 15 days of the written notification, and will be based on one of the following factors:

- 1) Procedural misconduct during the investigation.
- 2) The discipline does not seem to match the infraction.
- 3) New evidence, which was not previously available during the investigation, which may shed new light on the investigative findings.

Disciplinary action may be suspended during the hearing of the appeal at the discretion of the Executive Dean in consideration of the safety of the campus community. Appropriate measures will be taken during the appeal process to ensure an environment free of sexual discrimination and retaliation during the appeal process. In the case of an appeal, a final decision will be issued in writing to both the complainant and the respondent.

Other Related Misconduct

Word of Life Bible Institute takes the safety of its students, employees and all members of its school community seriously and desires to create an environment where all feel free and safe to report issues in regards to any form of sex discrimination. As such, the school reserves the right to extend grace to complainants and witnesses of alleged sex discrimination in the form of mitigation or avoidance of discipline in regards to the use of alcohol or drugs, provided that the individuals are acting in good faith as complainants or witnesses.

Retaliation; False Complaints

Word of Life Bible Institute prohibits retaliation against anyone for having raised a complaint under this policy in good faith or for cooperating with an investigation of a complaint. Any instances of retaliation should be reported to the Title IX Coordinator immediately and may result in disciplinary sanctions independent of other sanctions already implemented under the policy. Fabricated complaints alleging a violation of this policy will be subject to disciplinary action.