

TITLE IX SEX DISCRIMINATION AND SEXUAL HARASSMENT GRIEVANCE PROCEDURES

Policy Owner: Title IX Coordinator / Central Operations

Applies to: All Premiere Aesthetics Institute campuses, programs, students, applicants, employees, and other participants

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1. Purpose and Nondiscrimination Statement

Premiere Aesthetics Institute, LLC (“Premiere”) prohibits sex discrimination in its education programs and activities, including admission and employment, as required by Title IX.

These procedures explain how to report sex discrimination, sexual harassment, or retaliation, request assistance, and pursue a complaint. Sections 9–24 address formal sexual-harassment complaints; Sections 25–28 address other sex-discrimination and retaliation complaints. Sections 29–39 apply to both processes. These procedures apply across all Premiere campuses.

Premiere will respond promptly and equitably, use trained and impartial personnel, protect against retaliation, and provide the procedural rights described in this policy. A respondent is presumed not responsible until a determination is made through the grievance process.

Questions about Title IX may be directed to Premiere’s Title IX Coordinator, the U.S. Department of Education’s Office for Civil Rights, or both.

2. Relationship to Other Policies

Premiere uses the sexual-harassment process in Sections 9–24 when the applicable federal definition and jurisdictional requirements are met. Other sex-discrimination complaints, including pregnancy discrimination, and retaliation complaints follow Sections 25–28.

Routine pregnancy-related assistance is coordinated through the Student Pregnancy and Related Conditions Adjustment Plan. Conduct outside either complaint process may still require a response under another applicable school policy.

The Title IX Coordinator will identify the applicable process and explain it to the affected individuals. A dismissal from this Title IX process is not a finding that the conduct did not occur. Any alternative disciplinary process involving sexual assault, dating violence, domestic violence, or stalking must preserve applicable Clery/VAWA safeguards.

Supportive measures may be available without a formal complaint. Premiere does not offer informal resolution under these grievance procedures.

3. Title IX Coordinator and Reporting Options

Questions, reports of possible sex discrimination or sexual harassment, and requests for supportive measures may be directed to:

Sharron Prussner
Director of Operations, Title IX Coordinator
Premiere Aesthetics Institute, LLC
2463 E. Gala Street, Suite 110
Meridian, Idaho 83642
Telephone: (208) 229-4417
Email: sharron@premiereaestheticsinstitute.com

Any person may report a concern, whether or not they personally experienced the conduct. Reports may be made in person, by telephone, by mail, or by email. Telephone messages, emails, and mailed reports may be submitted outside regular business hours; these channels are not emergency services.

Reports may also be made to a School Director or another Premiere employee, who will promptly forward the information to the Title IX Coordinator. Individuals do not need to determine whether conduct qualifies under Title IX before reporting.

Include whatever information is available about the conduct, individuals involved, dates, locations, witnesses, evidence, and immediate safety concerns. A report may be verbal or written. Anonymous reports are accepted, although limited information may restrict Premiere’s ability to respond.

A report does not automatically begin a formal investigation. The Title IX Coordinator will assess the information, discuss available supportive measures, and explain the applicable process.

Alternate Contact

When the Title IX Coordinator is unavailable, has a conflict of interest, or is the subject of a report, contact:

John Smith
Owner, CFO
Premiere Aesthetics Institute, LLC
2463 E. Gala Street, Suite 110
Meridian, Idaho 83642
Telephone: 208-229-7546
Email: john@premiereaestheticsinstitute.com

Premiere will assign an appropriately trained, impartial alternate or qualified external professional when needed. A person whose conduct is challenged will not control the review or outcome.

Emergency and External Reporting

For an immediate emergency, call 911. Individuals may contact law enforcement or an appropriate government agency in addition to reporting to Premiere. A police report is not required to request assistance or use Premiere's grievance procedures.

4. Scope and Jurisdiction

The jurisdiction and formal-complaint requirements in this section apply to the sexual-harassment process in Sections 9–24. Other sex-discrimination and retaliation complaints are assessed under Sections 25–28.

The formal investigation and hearing process applies to complaints alleging conduct that, if proved:

- Meets the sexual-harassment definition in Section 5.
- Occurred against a person in the United States.
- Occurred within Premiere's education program or activity.

An education program or activity includes locations, events, and circumstances where Premiere exercised substantial control over both the respondent and the context of the conduct. This may include campus instruction, student spa activities, school-sponsored events, and covered online educational activities. Electronic communication is evaluated based on its circumstances, not solely the technology used.

A formal complaint is required to begin the formal investigation and hearing process. When a complainant files a formal complaint, the complainant must be participating or attempting to participate in a Premiere education program or activity at that time. The Title IX Coordinator may also sign a formal complaint as described in these procedures.

The Title IX Coordinator will assess jurisdiction without prejudging whether the conduct occurred. Individuals may report concerns and request supportive measures without filing a formal complaint or determining whether these requirements are met.

Conduct outside this process will be assessed for an appropriate response under another applicable policy, as explained in Section 2.

5. Definitions

Complainant and Respondent

A **complainant** is an individual alleged to have experienced conduct that could constitute sexual harassment. The person submitting a report may be someone other than the complainant. A **respondent** is an individual reported to have engaged in conduct that could constitute sexual harassment. These terms identify participants in the process and do not establish responsibility.

In Sections 25–28, “complainant” means the person alleging other sex discrimination or retaliation, and “respondent” means the person alleged to have engaged in it. A complaint may also challenge a school policy or departmental decision without identifying an individual respondent.

Report and Formal Complaint

A **report** is information about possible sexual harassment. It may be verbal or written and does not automatically initiate a formal investigation. 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 an investigation.

A complainant may submit the document in paper or electronic form. It must contain a physical or digital signature or otherwise indicate that the complainant is the person filing it. When the Title IX Coordinator signs a formal complaint, the Title IX Coordinator does not become a complainant or party.

Sexual Harassment

For these procedures, sexual harassment means conduct on the basis of sex that meets one or more of the following:

- **Employee quid pro quo:** A Premiere employee conditions a school aid, benefit, or service on an individual's participation in unwelcome sexual conduct.
- **Hostile-environment sexual harassment:** Unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it effectively denies equal access to Premiere's education program or activity.
- **Sexual assault, dating violence, domestic violence, or stalking:** Conduct meeting the applicable federal definitions summarized below.

The severe, pervasive, and objectively offensive standard applies to hostile-environment harassment; it is not an additional requirement for the other categories.

Sexual assault: Rape, fondling, incest, or statutory rape as defined in the federal Clery Act regulations and their incorporated definitions.

Dating violence: Violence, including sexual or physical abuse or threats of such abuse, by a current or former romantic or intimate partner. The relationship is assessed considering its length, type, and frequency of interaction. This category excludes conduct classified as domestic violence.

Domestic violence: A felony or misdemeanor crime of violence by a current or former spouse or intimate partner; a person sharing a child with the affected person; a person who lives or lived with that person as a spouse or intimate partner; a person similarly situated to a spouse under applicable law; or another person whose conduct is covered by applicable domestic- or family-violence protections.

Stalking: A course of conduct directed at a specific person that would cause a reasonable person in similar circumstances to fear for their safety or another person's safety, or experience substantial emotional distress. A course of conduct involves at least two acts, which may include following, monitoring, threatening, communicating, or interfering with property, directly or through others. Substantial emotional distress means significant mental suffering that need not involve professional treatment.

Supportive Measures

Individualized services offered when appropriate and reasonably available, without charge, to a complainant or respondent before, during, or after a formal process, or without a formal complaint.

Measures are nondisciplinary, nonpunitive, and designed to preserve or restore educational access, protect safety, or deter harassment without unreasonably burdening the other party.

Advisor

A person chosen by a party to assist during the grievance process. An advisor may be an attorney but need not be. At a live hearing, each party's advisor conducts that party's cross-examination; parties do not personally cross-examine one another.

Actual Knowledge

Notice of sexual harassment or allegations received by the Title IX Coordinator or another Premiere official authorized to institute corrective measures. An employee's duty to forward reports does not, by itself, establish that authority. Premiere's employee-reporting responsibilities apply separately from this federal notice standard.

Calendar and Business Days

Calendar days include weekends and holidays. **Business days** are Monday through Friday, excluding school holidays and scheduled administrative closures.

Each procedural notice will identify the applicable deadline, including its date, time, and time zone. Extensions are governed by the timeframe provisions of these procedures.

6. Employee Reporting Responsibilities

Premiere employees must promptly forward information about possible sex discrimination, sexual harassment, or retaliation to the Title IX Coordinator. If the concern involves the Title IX Coordinator, employees must report it to the designated alternate Title IX Coordinator.

Employees should respond privately and respectfully, address immediate safety needs, and share available information about the conduct, individuals involved, witnesses, and relevant records. Employees should not require the affected person to repeat an account unnecessarily or provide information they do not have.

Unless expressly assigned an authorized role under the applicable procedure, employees must not investigate, assess credibility, confront the person accused, or attempt to resolve the allegation.

Employees must not promise absolute confidentiality, a particular outcome, or that no further action will occur. Explain that information will be shared as necessary to provide assistance and carry out Premiere's responsibilities.

A routine pregnancy disclosure or assistance request follows Premiere's pregnancy-support process. It is not automatically a misconduct complaint. Any accompanying discrimination or retaliation concern must also be reported to the Title IX Coordinator.

These responsibilities do not replace emergency assistance or legally required reporting to outside authorities.

7. Initial Response and Supportive Measures

After receiving a report, the Title IX Coordinator will promptly assess immediate safety needs and contact the person alleged to have experienced misconduct, ordinarily within one to two business days. Urgent concerns require faster action.

The Title IX Coordinator will:

- Discuss available supportive measures and consider the person's wishes.
- Explain that assistance is available without a formal complaint.
- Explain how to file a formal complaint and what the process involves.
- Provide information about relevant resources, reporting options, and evidence preservation.
- Explain privacy limitations and protection against retaliation.

Premiere will not pressure a person to file or refrain from filing a formal complaint. If the person does not respond, the Title IX Coordinator will make reasonable follow-up attempts and assess what further action is appropriate.

Available Supportive Measures

Supportive measures are individualized, reasonably available, and provided without charge. They must be nondisciplinary, nonpunitive, and must not unreasonably burden the other party.

Depending on individual needs, measures may include:

- Class, student spa, or work-schedule adjustments.
- Coursework extensions or academic assistance.
- Seating or workstation changes.
- Mutual restrictions on contact.
- Safety planning or increased supervision.
- Referrals to counseling, medical care, advocacy, or other resources.
- Other appropriate arrangements to preserve access or protect safety.

Measures may be available to either party before, during, or after a grievance process, or when no formal complaint is filed. Providing a measure does not establish that misconduct occurred.

Implementation and Review

The Title IX Coordinator will coordinate implementation and review whether measures remain appropriate. Either party may request a change or report an implementation problem.

A concern involving the Title IX Coordinator's own conduct or a conflict of interest will be referred to an impartial alternate.

Premiere will keep supportive measures confidential to the extent doing so does not interfere with providing them. Employees ordinarily receive only the information necessary to implement an arrangement.

The Title IX Coordinator will document measures offered, accepted, declined, or unavailable, including relevant reasons, alternatives, and follow-up.

8. Emergency Removal and Employee Administrative Leave

Emergency Removal

Premiere may temporarily remove a respondent from an education program or activity only after an individualized safety and risk assessment establishes that an immediate threat to a person's physical health or safety arising from the sexual-harassment allegations justifies removal.

An allegation alone does not justify emergency removal. The decision must account for applicable disability protections.

Premiere will provide written notice explaining the removal and how to challenge it immediately afterward. The respondent may contact the Title IX Coordinator or designated alternate Title IX Coordinator to request prompt review and present information relevant to the removal.

The removal notice will identify the person responsible for reviewing the challenge. This review addresses the need for emergency removal and does not replace the grievance process or determine responsibility.

Employee Administrative Leave

Premiere may place a nonstudent employee respondent on administrative leave while the formal grievance process is pending, consistent with applicable employment policies and law.

Administrative leave is not a determination of responsibility. Neither administrative leave nor emergency removal limits rights under applicable disability laws.

SEXUAL HARASSMENT COMPLAINT PROCESS

9. Filing and Signing a Formal Complaint

A complainant may file a formal complaint with the Title IX Coordinator in person, by mail, or electronically using the contact information in Section 3. The complaint must meet the requirements described in Sections 4 and 5. The Title IX Coordinator can explain those requirements and provide assistance with submission.

If the complainant does not wish to file, the Title IX Coordinator will consider the person's wishes alongside the circumstances, including:

The seriousness of the alleged conduct and any threats, violence, or coercion.

Reports of similar conduct involving the respondent.

The complainant's age or vulnerability.

Available evidence and continuing safety or educational-access concerns.

The Title IX Coordinator may sign a formal complaint when necessary to provide an appropriate institutional response. The Title IX Coordinator will document the reasons and inform the complainant.

Signing a complaint does not make the Title IX Coordinator a party, establish that the allegations are true, or remove the obligation to remain impartial. A complainant may decline to participate, although Premiere may proceed based on available evidence.

Supportive measures remain available whether or not a formal complaint is filed.

10. Consolidation of Formal Complaints

Premiere may combine formal complaints when the sexual-harassment allegations arise from the same facts or circumstances. This may include complaints involving multiple complainants or respondents, or complaints by the parties against one another.

The Title IX Coordinator will consider fairness, privacy, potential conflicts, and unnecessary delay when determining whether consolidation is appropriate. Premiere will notify the affected parties and preserve each party's procedural rights.

Consolidation does not establish responsibility. Each allegation must receive an individual determination based on the evidence.

11. Dismissal and Referral

Required Dismissal

Premiere must dismiss a formal complaint or allegation from this federal Title IX sexual-harassment process when the alleged conduct, even if proved:

- Would not meet the sexual-harassment definition in Section 5.
- Did not occur within Premiere's education program or activity.
- Did not occur against a person in the United States.

Discretionary Dismissal

Premiere may dismiss a formal complaint or particular allegations when:

- The complainant notifies the Title IX Coordinator in writing that they wish to withdraw the complaint or allegations.
- The respondent is no longer enrolled at or employed by Premiere.
- Specific circumstances prevent Premiere from gathering sufficient evidence to reach a determination.
- These circumstances permit dismissal but do not automatically require it.

Notice, Appeal, and Continued Assistance

Premiere will promptly provide both parties simultaneous written notice explaining the dismissal, its reasons, and how to appeal. Either party may appeal within five business days after receiving the notice, under the appeal provisions of these procedures.

The Title IX Coordinator will reassess supportive measures and identify any appropriate referral to another school process. Dismissal does not establish that the conduct did not occur or eliminate applicable Clery/VAWA requirements for an alternative disciplinary proceeding.

12. General Grievance Requirements and Timeframes

Premiere will conduct a prompt, equitable process using trained personnel who are impartial and free from conflicts of interest or bias.

The respondent is presumed not responsible until a determination is made through these procedures. Premiere bears the burden of proof and responsibility for gathering sufficient evidence. Evidence will be evaluated objectively, and credibility will not be determined by a person's status as complainant, respondent, or witness.

Premiere uses the preponderance of the evidence standard for both student and employee complaints: whether it is more likely than not that the alleged policy violation occurred.

Disciplinary sanctions for the alleged sexual harassment will not be imposed before completion of the applicable grievance process. Emergency removal and employee administrative leave are governed by Section 8.

Completion Target

Premiere aims to complete the process from receipt of a formal complaint through the written determination within **90 calendar days**, excluding appeals.

This includes at least 10 calendar days for the parties to respond to directly related evidence before the investigative report is completed, and delivery of that report at least 10 calendar days before the hearing.

Delays and Extensions

Temporary delays or limited extensions may be granted for good cause, including necessary participant availability, concurrent law-enforcement activity, or language or disability-access needs.

The Title IX Coordinator will provide both parties written notice explaining the reason and revised timeframe. Appropriate supportive measures will continue during a delay. A police investigation does not automatically suspend Premiere's response.

13. Notice of Allegations

When a formal complaint proceeds, Premiere will provide written notice to the known parties with sufficient time to prepare before an initial investigative interview.

The notice will include:

- These grievance procedures and confirmation that informal resolution is not offered.
- The identities of the parties, alleged conduct, and incident dates and locations, if known.
- The presumption that the respondent is not responsible and that responsibility will be determined through the grievance process.
- Each party's right to an advisor of choice, who may be an attorney.
- Each party's right to inspect and review evidence.
- Any applicable school policy prohibiting knowingly false statements or knowingly submitting false information.

If Premiere decides to investigate additional allegations, it will provide supplemental written notice to the affected parties.

14. Advisors

Each party may choose an advisor, including an attorney, to accompany them to any related meeting or proceeding. Premiere will provide equal opportunities for advisor presence and apply any participation rules equally.

During investigative meetings, advisors may provide support and advice. Premiere may require parties to answer questions themselves while allowing reasonable consultation with their advisors.

At the live hearing, each party's advisor conducts relevant cross-examination and follow-up questioning. Parties do not personally cross-examine one another.

If a party has no advisor present at the hearing, Premiere will provide one without charge to conduct cross-examination. That advisor need not be an attorney and is not provided as legal counsel.

Parties should promptly identify their advisors and communicate scheduling needs. Requests for scheduling adjustments will be considered under Section 12.

15. Investigation

Premiere will appoint a trained, impartial internal or external investigator. The Title IX Coordinator may serve as investigator when appropriately trained and free from conflicts of interest or bias.

The investigator gathers and evaluates information but does not determine responsibility. The hearing decision-maker must be separate from the Title IX Coordinator and investigator.

The investigator will:

- Review the complaint and allegations.
- Seek relevant records and interview available parties and witnesses.
- Give both parties equal opportunities to identify fact and expert witnesses and submit evidence supporting or opposing the allegations.
- Document material evidence and collection efforts.
- Complete the evidence-review and investigative-report steps described in these procedures.

When a party's participation is invited or expected, Premiere will provide advance written notice identifying the meeting's date, time, location or format, participants, and purpose, with sufficient preparation time.

Premiere will not restrict either party from discussing the allegations or gathering and presenting relevant evidence. Retaliation and intimidation remain prohibited.

Legally privileged information will not be used unless the person holding the privilege waives it. Premiere will not access, consider, disclose, or otherwise use protected treatment records without the voluntary written consent required by law for this grievance process.

A party may decline to participate. Premiere may continue using available evidence, but a responsibility determination will not be based solely on a party's or witness's absence or refusal to answer questions.

16. Evidence Considerations

Relevant evidence helps determine whether an alleged policy violation occurred. Premiere will evaluate evidence supporting and opposing the allegations, subject to the privilege and treatment-record protections in Section 15.

Questions and evidence about a complainant's sexual predisposition are not relevant. Prior sexual behavior is not relevant unless offered to show that someone other than the respondent committed the alleged conduct, or involving specific prior sexual behavior with the respondent offered to establish consent.

Evidence shared for review under Section 17 may be broader than the relevant evidence included in the investigative report.

17. Review of Directly Related Evidence

Before completing the investigative report, Premiere will send each party and their advisor, if any, the evidence obtained that directly relates to the allegations, electronically or in hard copy. This includes evidence supporting or opposing the allegations and evidence Premiere does not intend to rely upon.

Each party will have at least 10 calendar days to submit a written response. The investigator will consider timely responses before completing the report.

The evidence shared for review will also be available at the hearing, giving both parties an equal opportunity to refer to it, including during questioning.

18. Investigative Report

The investigator will prepare a report fairly summarizing relevant evidence and considering the parties' evidence-review responses. The report will not determine or recommend whether the respondent is responsible.

Premiere will send the report electronically or in hard copy to each party and their advisor, if any, at least 10 calendar days before the hearing, for review and written response. Premiere will communicate the response deadline to both parties.

This report-review period is separate from the evidence-review period in Section 17. The hearing decision-maker determines responsibility.

19. Live Hearing

Premiere will hold a live hearing before determining responsibility for a formal complaint that proceeds through these procedures.

Hearing Arrangements

A trained, impartial hearing decision-maker will conduct the hearing and determine responsibility. That person must not be the Title IX Coordinator or investigator in the same matter.

Premiere will provide advance written notice of the hearing's date, time, location or format, participants, and purpose, allowing sufficient preparation time. Parties may request disability accommodations or language assistance through the Title IX Coordinator.

The hearing may occur in person or remotely. At either party's request, Premiere will arrange separate locations with technology allowing the decision-maker and parties to see and hear the person answering questions simultaneously.

Questions and Evidence

The decision-maker may ask relevant questions. Each party's advisor may directly ask the other party and witnesses relevant questions and follow-up questions, including questions about credibility, orally and in real time. Parties may not personally cross-examine one another.

If a party has no advisor present, Premiere will provide one without charge to conduct cross-examination.

Before a question is answered, the decision-maker will determine relevance and explain any exclusion. The evidence restrictions in Section 16 apply. Reasonable conduct rules will apply equally and will not prevent otherwise relevant questioning.

Evidence shared under Section 17 will remain available for both parties to reference during the hearing.

Nonparticipation and Recording

A party or witness may decline to participate or answer questions. The decision-maker will not draw an inference about responsibility solely from that absence or refusal. An otherwise permissible statement will not automatically be excluded because its speaker did not undergo cross-examination.

Premiere will create an audio or audiovisual recording or transcript and make it available to both parties for inspection and review.

20. Standard of Evidence

Premiere uses the preponderance of the evidence standard: whether it is more likely than not that the alleged policy violation occurred. The same standard applies to formal complaints involving students and employees.

The hearing decision-maker evaluates the evidence independently. The respondent remains presumed not responsible unless responsibility is established through this process.

21. Written Determination

The hearing decision-maker will issue a written determination identifying:

- The allegations reviewed.
- The procedural steps, including notices, interviews, evidence collection, and hearing.
- Findings of fact and application of Premiere's policy to those findings.
- The result and reasons for each allegation.
- Any disciplinary sanctions and whether remedies will be provided to restore or preserve the complainant's equal educational access.
- The available appeal grounds, submission instructions, and deadline.

Premiere will send the determination simultaneously to both parties.

The determination becomes final when the appeal deadline expires without an appeal or when Premiere provides both parties the written appeal decision. The Title IX Coordinator will implement remedies and coordinate sanctions with the authorized administrator. Premiere will notify both parties simultaneously in writing of any change to the result and when the result becomes final.

22. Appeals

Either party may appeal a responsibility determination or dismissal of a formal complaint or allegation on these grounds:

- A procedural irregularity that affected the outcome.
- New evidence that was not reasonably available when the determination or dismissal was made and could affect the outcome.
- A conflict of interest or bias by the Title IX Coordinator, investigator, or decision-maker that affected the outcome.

The party requesting an appeal must submit a written appeal explaining the grounds and supporting information to the Title IX Coordinator or designated alternate Title IX Coordinator within five business days after receiving the decision.

Premiere will promptly notify the other party in writing and provide the appeal. That party will have five business days after receipt to submit a written response. These opportunities apply equally to both parties.

A trained, impartial appeal decision-maker will review the appeal and relevant record. That person must not be the Title IX Coordinator, investigator, or person who issued the original determination or dismissal.

Premiere aims to provide both parties a simultaneous written appeal decision, explaining the result and reasons, within 20 business days after the response deadline. Good-cause extensions follow Section 12.

If further proceedings are required, the appeal decision will identify the next steps. Appropriate supportive measures may continue throughout the appeal and any further proceedings.

23. Informal Resolution

Premiere does not offer informal resolution under these grievance procedures.

24. Sanctions and Remedies

After a final responsibility determination, Premiere may impose one or more sanctions appropriate to the findings and circumstances.

Student sanctions may include:

- Written warning.
- Required education or training.
- Behavioral requirements.
- Restrictions on contact, activities, access, or privileges.
- Disciplinary probation.
- Removal or reassignment from a class, student spa, or practical activity.
- Suspension.
- Termination of enrollment or expulsion.

Employee sanctions may include:

- Corrective counseling or written warning.
- Required education or training.
- Restrictions on contact or access.
- Changes in duties, supervision, or assignment.
- Disciplinary probation.
- Suspension, demotion, or termination of employment.

Sanctions must be consistent with applicable school policies and law. The written determination will identify the sanctions and their reasons.

Remedies are intended to restore or preserve the complainant's equal educational access. They may include academic assistance, schedule changes, make-up opportunities, or other appropriate corrective measures. Following a responsibility determination, remedies may be disciplinary or burdensome to the respondent.

The Title IX Coordinator will implement remedies and coordinate sanctions with the authorized administrator. Appropriate supportive measures may continue while an appeal is pending.

OTHER SEX DISCRIMINATION AND RETALIATION COMPLAINT PROCESS

25. Scope and Reporting

This process addresses other sex-discrimination complaints, including pregnancy discrimination, and retaliation complaints that do not require the formal sexual-harassment process.

Individuals may report verbally or in writing to the Title IX Coordinator using Section 3's contact information. A concern involving the Title IX Coordinator must be directed to the alternate Title IX Coordinator. A signed formal complaint is not required.

Routine pregnancy-related assistance remains available through the Student Pregnancy and Related Conditions Adjustment Plan while a complaint is reviewed.

26. Review and Decision

The Title IX Coordinator will assess the concern, explain the applicable process, and arrange appropriate interim measures to preserve access without imposing punishment before a determination.

The Title IX Coordinator may conduct the review or appoint a trained, impartial internal or external reviewer. A person whose conduct or decision is challenged must not investigate or decide the complaint.

Both parties will receive notice of the concern and equitable opportunities to respond, identify witnesses, provide relevant information, and address material information before a decision.

The reviewer will evaluate the evidence using the preponderance of the evidence standard: whether it is more likely than not that the applicable policy was violated. A live hearing is not ordinarily required.

Premiere aims to provide a written outcome within 60 calendar days after receiving the complaint, excluding appeals. The outcome will explain the findings, decision, reasons, corrective measures affecting the recipient, and appeal instructions. Private information will be protected consistent with applicable law.

Good-cause extensions will be communicated to both parties in writing with the reason and revised timeframe. Premiere does not offer informal resolution under this process.

27. Appeals

Either party may appeal based on:

- A procedural irregularity that affected the outcome.
- New evidence not reasonably available during the review that could affect the outcome.
- A conflict of interest or bias by the Title IX Coordinator, reviewer, or decision-maker that affected the outcome.

The party requesting an appeal must submit it in writing to the Title IX Coordinator or designated alternate Title IX Coordinator within five business days after receiving the outcome. Premiere will provide the appeal to the other party, who will have five business days after receipt to respond.

A trained, impartial appeal decision-maker who was not the Title IX Coordinator, investigator, reviewer, or original decision-maker in the matter will review the appeal. Premiere aims to provide both parties the written appeal decision within 20 business days after the response deadline, subject to written good-cause extensions.

The written appeal decision will explain the result and reasons. The determination becomes final when the appeal deadline expires without an appeal or when the appeal decision is issued. If the appeal requires further review, the decision will identify the next steps.

28. Remedies and Related Protections

When a violation is established, Premiere will take appropriate action to stop it, address its effects, and prevent recurrence. Actions may include correcting records, restoring opportunities, changing discriminatory practices, providing training, or imposing authorized discipline.

The Title IX Coordinator will oversee implementation and follow-up. Retaliation is prohibited. Privacy, accessibility, and recordkeeping protections in the main policy apply to this process.

If allegations require the formal Title IX sexual-harassment process or additional Clery/VAWA safeguards, Premiere will apply those requirements. Individuals may also seek assistance from an appropriate government agency without completing this internal process.

REQUIREMENTS APPLYING TO BOTH COMPLAINT PROCESSES

29. Retaliation and Interference

Premiere prohibits intimidation, threats, coercion, or discrimination intended to interfere with Title IX rights or taken because someone reported a concern, requested assistance, or participated—or declined to participate—in a Title IX process.

Examples include pressuring someone to withdraw a complaint or change their account, threatening a witness, or imposing academic or employment penalties because of protected activity.

Concerns should be reported promptly to the Title IX Coordinator or, when the concern involves that person, the alternate Title IX Coordinator. Premiere will address retaliation complaints through Sections 25–28 and provide appropriate interim protections.

Retaliation may be established even when the original complaint is not substantiated. An unsuccessful complaint does not, by itself, establish that someone made a materially false statement in bad faith. Any disciplinary action for such a statement requires a separate, supported basis.

Legitimate, nonretaliatory academic or employment action and legally protected expression are not prohibited by this section.

30. Privacy and Confidentiality

Premiere will protect the identities and private information of parties and witnesses, except when disclosure is permitted by student-record privacy law, required by law, or necessary to conduct these procedures.

Information will be shared only as appropriate to provide assistance, assess safety, review allegations, implement decisions, or meet legal obligations. Absolute confidentiality cannot be guaranteed.

Privacy protections do not prevent required notices, evidence access, or disclosure of outcomes to the parties. Premiere will not prohibit parties from discussing allegations or gathering and presenting relevant evidence.

Medical records and legally privileged information remain subject to the protections in Section 15.

31. Conflicts of Interest and Bias

The Title IX Coordinator, investigator, hearing decision-maker, and appeal decision-maker must be trained and impartial, without conflicts of interest or bias toward complainants or respondents generally or any individual involved.

A party should promptly report a specific concern to the Title IX Coordinator. Concerns involving the Title IX Coordinator must be directed to the alternate Title IX Coordinator identified in Section 3.

Premiere will assess the concern and arrange a qualified replacement when necessary. Holding more than one job title does not satisfy a requirement for independent review.

For the sexual-harassment process, the hearing decision-maker must be separate from the Title IX Coordinator and investigator. Appeal decision-makers must satisfy the independence requirements in Section 22 or Section 27, depending on the process used.

An advisor supports the party they assist and does not serve as an impartial decision-maker.

32. Reasonable Accommodations and Language Assistance

A participant needing disability accommodations, language assistance, or another adjustment to access the process should contact the Title IX Coordinator as soon as the need is known.

Premiere will assess the request individually and coordinate appropriate assistance with the responsible official. Participants need provide only information necessary to evaluate the request.

Assistance will support meaningful participation while preserving both parties' procedural rights. Any necessary extension will follow Section 12 for sexual-harassment complaints or Sections 26–27 for other sex-discrimination and retaliation complaints.

33. Interaction With Law Enforcement and Other Proceedings

Individuals may pursue a police report and a Premiere complaint at the same time. Reporting to police is not required to receive supportive measures or use these procedures.

Premiere may temporarily delay specific investigative steps for good cause related to law-enforcement activity. Any delay will follow the applicable process's extension provisions, and appropriate supportive measures will continue. Premiere will not automatically wait for a criminal investigation or prosecution to conclude.

A criminal outcome does not determine Premiere's outcome because the processes apply different standards and requirements.

When another school process also applies, Premiere will identify the applicable procedures and coordinate them to avoid unnecessary duplication or conflicting instructions while preserving required rights.

34. Recordkeeping

Premiere will securely retain case records for at least seven years after closure, or longer when required by law or a preservation obligation. Records include reports, assessments, supportive measures, evidence, notices, hearing records, decisions, appeals, sanctions, and remedies.

The Title IX Coordinator will document the reasons for Premiere's response, including measures taken to preserve or restore educational access. If supportive measures are not provided, the record will explain why that response was reasonable under the circumstances.

Access will be limited consistent with applicable privacy laws and the rights provided in these procedures.

35. Training

Premiere will ensure that the Title IX Coordinator, investigators, and decision-makers receive training appropriate to their roles, including applicable definitions, jurisdiction, procedures, impartiality, conflicts of interest, and bias.

Investigators will receive training on relevance and investigative reports. Hearing decision-makers will receive training on relevance, sexual-history restrictions, and hearing technology. Officials conducting Clery/VAWA-covered disciplinary proceedings will receive the required annual training.

Training materials must avoid sex stereotypes and promote impartial proceedings. Premiere will retain required Title IX training materials for at least seven years and make them publicly available on its website.

36. Publication and Distribution

Premiere will publish these procedures and current Title IX Coordinator contact information on its public website and provide notice of the procedures to students, employees, and applicants.

School catalogs and handbooks will include the nondiscrimination notice, Title IX Coordinator contact information, and a direct link to the complete procedures. Printed copies will be available upon request.

Premiere will keep reporting instructions consistent across campuses and update affected publications when the procedures or contact information change.

37. Relationship with Other Policies

These procedures operate alongside Premiere's pregnancy-assistance process, disability procedures, and applicable student and employee policies.

The Title IX Coordinator will identify the applicable process when concerns overlap or fall outside this policy. Another process will not be used to bypass required Title IX protections. Applicable Clery/VAWA safeguards remain in effect for covered disciplinary proceedings.

Premiere's internal Title IX SOP guides staff implementation but does not replace the rights and procedures published here.

38. External Assistance and Complaints

Individuals may contact the **U.S. Department of Education's Office for Civil Rights (OCR)** about possible sex discrimination or retaliation.

Complaint information and filing options: <https://www.ed.gov/laws-and-policy/civil-rights-laws/file-complaint>

Online complaint form: <https://ocras.ed.gov>

Individuals may also contact another appropriate government agency or law enforcement. They do not need to complete Premiere's grievance process before seeking external assistance. External agencies have their own filing requirements and deadlines.

For an immediate emergency, call 911.

39. Policy Review and Amendment

The Title IX Coordinator will review these procedures at least annually and when changes in law, school operations, or identified concerns warrant revision.

Revisions will be approved through Premiere's policy-approval process, published, and communicated to affected community members. Premiere will identify the effective date and retain superseded versions.

For earlier conduct or pending matters, Premiere will identify and communicate the applicable policy and procedure, consistent with controlling law.

APPENDIX A — SEXUAL HARASSMENT PROCESS SUMMARY

This summary applies only to the sexual-harassment process in Sections 9–24. For other sex-discrimination and retaliation complaints, see Sections 25–28.

1. **Report and assistance.** The Title IX Coordinator assesses the report, discusses supportive measures, and explains available options. A report does not automatically begin an investigation.
2. **Formal complaint and assessment.** The complainant files, or the Title IX Coordinator signs, a formal complaint. Premiere assesses jurisdiction and any grounds for dismissal. Either party may appeal a dismissal.
3. **Notice and investigation.** Premiere provides written notice of the allegations and assigns a trained, impartial investigator.
4. **Evidence review.** Each party and their advisor receive directly related evidence. Parties have at least 10 calendar days to submit a written response before the investigative report is completed.
5. **Investigative report.** Each party and their advisor receive the report at least 10 calendar days before the hearing, for review and written response.
6. **Live hearing.** A separate, impartial decision-maker conducts the hearing. Advisors conduct cross-examination.
7. **Written determination.** Both parties receive the determination simultaneously. Premiere aims to reach this stage within 90 calendar days after receiving the formal complaint, excluding appeals and subject to documented good-cause extensions.
8. **Appeal.** Either party may appeal within five business days after receiving the decision. The other party has five business days after receiving the appeal to respond. Premiere aims to issue the appeal decision within 20 business days after the response deadline.
9. **Implementation and follow-up.** The Title IX Coordinator implements remedies, coordinates final sanctions, and monitors continuing needs.

Supportive measures may continue throughout the process. This summary does not replace the complete procedures.

APPENDIX B — CAMPUS CONTACTS

Students and employees at the Meridian, Post Falls, and Bend campuses may report concerns directly to the Title IX Coordinator using the contact information in Section 3 or to their School Director.

School Directors receive reports, address immediate safety needs, and promptly forward information to the Title IX Coordinator. They do not independently investigate or decide complaints unless expressly assigned, appropriately trained, and impartial.

When a concern involves a School Director, individuals may report directly to the Title IX Coordinator. When it involves the Title IX Coordinator, individuals should use the alternate Title IX Coordinator contact in Section 3.

For an immediate emergency, call 911.