



2026 High School Summer Program STUDENT HANDBOOK



LANDMARK
COLLEGE

Landmark College is committed to providing accessible digital content in accordance with [Web Content Accessibility Guidelines \(WCAG\) 2.2](#) AA standards and applicable federal and state laws. If you encounter a barrier with this document, please contact CampusLife@landmark.edu for assistance.

Table of Contents

How to Use This Handbook	1
Read The “Welcome” And “Student Rights & Responsibilities” Sections Before You Arrive.....	1
Use The Table of Contents.....	1
Check Out the Policy Summaries.....	1
When In Doubt, Ask A Staff Member.....	1
Welcome To the High School Summer Program	2
Overview & Purpose of The Program.....	2
Your Commitment to This Community	3
Understanding The Difference Between Safety and Discomfort	3
Addenda & Changes Between Publications	5
Student Rights & Responsibilities	6
Student Rights	6
Student Responsibilities	7
Student Protections	10
Vermont Mandatory Reporting Policy	10
Access To Records (Notification Of Summer High School Program Students’ Rights Under FERPA)	11
Notice Of Non-Discrimination	13
Anti-Harassment Policy	14
Bias Incident Response.....	15
Accommodations Policy and Procedures.....	17
Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence, and Stalking Policy (Title IX Policy).....	17
Student Chosen Names and Pronouns	21
Privacy & Dignity.....	22
Health, Wellness, and Safety.....	23
Mental Health Support & Crisis Response	23
Student Safety or Threat of Harm to Others	24
Immunization Policy for High School Program Participants	25
Prescription Medication	25
Alcohol & Other Drug Policies.....	26
Weapons	27
Fighting & Violence	28
Community Standards & Conduct.....	28
Standards of Conduct.....	28
Community Living Expectations.....	29
Social Media and Online Conduct Policy.....	30
Policy On Relationships and Public Displays of Affection	32
Anti-Hazing Policy.....	33
Anti-Bullying Policy	37
Recording Policy.....	38
Dress Code	39

Academic Program Policies	39
Attendance	39
Classroom Behavior	39
Academic Integrity	40
Other Policies That Apply to Time in Class	41
Residential Life Policies	42
Living In the Residence Halls	42
Room Use & Occupancy	42
Room Changes	43
Damage Assessment	43
Quiet Hours and Courtesy Hours	43
Curfew	44
Residence Hall Safety & Security	44
Identification Cards	44
Room Keys	44
Locking Doors and Windows	44
Room Inspections	45
Room, Automobile, and Personal Effects Searches	45
Personal Property Liability	45
Fire Safety	45
Fire Drills and Building Evacuation	46
Guests	46
Visitor Policy	47
Dining Services	48
Food Delivery and Outside Deliveries	49
Mail & Packages	50
Campus Policies & Operations	50
Guidelines For Campus Access and Shared Spaces	50
Permission To Leave Campus	51
Computer and Network Acceptable Use Policy	52
Mobile Phones	53
Video Surveillance Cameras	54
Automobiles	55
Compliance With College and Program Officials	55
Formal Processes	55
Grievance Process	55
Conduct Process & Disciplinary Procedures	56
General Sanctions	57
Community Standards Conferences	58
Interim Actions	60
Culpability	61
Appendix A – Accommodations Policy and Procedures	62
Accommodations Policy Statement	62
Admission For Students With Disabilities	62

Confidentiality of Disability-Related Information	62
Accessibility of Campus Events and Programs	63
Section 504 Coordinator	63
ADA Coordinators	63
Student Accommodation Procedures	64
Appeal Procedures	67
Complaints Regarding Disability-Related Harassment and Discrimination.....	68
Assistance For Students With Temporary Impairments	68
Service & Emotional Support Animals	69
Digital Accessibility Policy.....	72
Appendix B: Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence, and Stalking Policy	76
Notice of Nondiscrimination on the Basis of Sex.....	76
Scope of Policy	76
Title IX Coordinator	77
General Definitions.....	77
Prohibited Conduct	80
Coordination With Other Policies	86
Separate Handling of Other Policy Violations By Reporting Students.....	86
Confidentiality.....	86
Community Assistance and Resources For Victims of Sexual Misconduct, Domestic Violence, Dating Violence, and/or Stalking	88
Reporting and Initial Considerations Regarding Sexual Harassment/Misconduct, Domestic Violence, Dating Violence, Or Stalking Complaints.....	89
Formal Complaints of Sexual Harassment/Misconduct, Domestic Violence, Dating Violence, Stalking or Related Retaliation	94
Investigations In Title IX Sexual Harassment Cases.....	97
Hearings In Title IX Sexual Harassment Cases	100
Standard of Proof.....	104
Sanctions.....	104
Appeal Procedure in Title IX Sexual Harassment Cases.....	106
Informal Resolution in Title IX Sexual Harassment Cases	106
Educational Programming.....	107
Glossary of Policies.....	108

How to Use This Handbook

This handbook is your guide to the High School Summer Program and covers what to expect, what is expected of you, and what to do when you need help or something goes wrong. It covers everything from daily schedule and curfew to your legal rights as a student to how the College handles serious conduct matters.

You do not need to read it cover to cover before you arrive (though you are welcome to). What matters is that you know it exists, know roughly what is in it, and know how to find what you need. A few suggestions for how to use it:

Read The [“Welcome”](#) And [“Student Rights & Responsibilities”](#) Sections Before You Arrive

These sections will tell you what the program looks like day to day, and what you are entitled to as a student here, including some protections that are specific to the High School Summer Program because you are a minor in a residential setting. Both are worth knowing before you get here.

Use The Table of Contents

The handbook is organized into nine sections as outlined in the [Table of Contents](#). If you have a question, it will typically be answered under one of these sections. You do not have to search the whole document.

Check Out the Policy Summaries

Summary: Every policy in this handbook opens with a one-sentence summary (that looks like the one you are reading now) that tells you plainly what the section covers.

These summaries are collected in a full [glossary](#) at the back of the handbook, so you can scan all policies in one place and go directly to the ones that matter to you, without reading the entire document from start to finish. The full policy text always governs; the summaries are a starting point, not a substitute.

When In Doubt, Ask A Staff Member

This handbook cannot anticipate every situation. If something comes up that isn't covered here, or if a policy isn't clear, ask your Resident Dean, the Program Director, or any High School Summer Program staff member. That is what they are here for.

A note on language: this handbook is written to you — the student — in plain, direct language. Where policies have legal dimensions, we have tried to explain what they mean in practice, not just quote the regulation. If something still doesn't make sense, ask.

Welcome To the High School Summer Program

Overview & Purpose of The Program

Summary: Describes the program as a genuine early college experience designed for neurodiverse learners, where students attend real courses, live on campus, and develop independence in a community built for them.

For three weeks this summer, you will do something most students your age have not yet had the chance to do: attend college. You will take real courses, live in a residence hall, manage your own schedule, navigate a campus, build relationships with peers, and engage with faculty and staff who take your intellect and identity seriously.

The Landmark College High School Summer Program (HSSP) was designed specifically for students who learn differently. Landmark College is the first college in the country whose primary mission is to serve students with learning disabilities, ADHD, and Autism. Everyone on this campus understands what it means to think and learn in ways the traditional school system wasn't built for. You don't have to explain yourself here. You don't have to hide strategies that work for you or apologize for the way your brain operates. That is not a small thing.

The program is rigorous. You will be challenged academically, socially, and personally. Living away from home, building new friendships, and managing your time without your usual support structures in place is genuinely hard, and also genuinely worth it. Here, you will develop skills such as self-advocacy, independence, persistence, and community membership. These are the important skills that will carry you through college and beyond.

Program Structure and Daily Life

Your days here will have shape and rhythm. Mornings begin with breakfast and move into academic coursework — real college classes, taught by Landmark faculty, with the same expectations and engagement you would find in any college classroom. Afternoons and evenings may still carry academic work, but primarily shift toward community: structured programming, activities, free time, and the kind of unscripted peer time where the most important learning of a residential experience often happens. Weekends open up further, with organized excursions and more space to breathe, explore, and settle into the community you are building. That structure is not incidental — it is part of what makes this program work. Predictability creates the conditions for risk-taking, and risk-taking is where growth lives. You will always know roughly what the day holds, who is available to you, and what comes next. And when something unexpected happens — because it will — someone will be there to help you figure it out.

Weekday Student Schedule

Time	Event
7:30 - 8:45 am	Breakfast (meds distribution)
9:15 -10:30 am	Class Period 1
10:45 am - 12:00 pm	Class Period 2
12:00 -1:30 pm	Lunch (meds distribution)
1:30 - 2:45 pm	Class Period 3
3:00 - 5:00 pm	Activities

Time	Event
5:00 - 6:50 pm	Dinner (meds distribution)
7:00 - 7:30 pm	Wing/Hall Meetings
7:30 - 9:00 pm	Academic Prep Tuesdays and Thursdays
9:00 - 10:00 pm	Nighttime meds distribution
7:30 - 3:00 pm	Social Activities, Free Time, Laundry, Etc.
10:30 pm	Curfew: In Hall
10:45 pm	Curfew: In Wing
11:00 pm	Curfew: In Room, doors closed

The staff and faculty of the High School Summer Program are here because they believe in this work and in you. Residential staff, academic instructors, mental health therapists, and program administrators are present, accessible, and genuinely interested in your success. You will not be left to figure things out alone. But you will be expected to step forward and ask for help when you need it, to engage honestly when something is hard, and to show up fully for your three weeks here.

This is the beginning of something. Make the most of it.

Your Commitment to This Community

Summary: Enrollment in the program constitutes the student's agreement to abide by all handbook policies, and that the College will act consistently with its mission in situations not explicitly covered.

By enrolling in Landmark College and the High School Summer Program, students acknowledge and agree to abide by the guidelines and policies outlined in this handbook and understand the college's right to address issues and behaviors not specifically mentioned within.

In situations not specifically covered by this handbook, the College will act in a manner consistent with its mission, values, and commitment to a safe and supportive community.

Understanding The Difference Between Safety and Discomfort

Summary: Distinguishes between genuine safety concerns — which must be reported — and the discomfort of growth, which is expected, normal, and supported but not a reason to disengage from the program.

One of the most important things you can learn during the program is the difference between feeling unsafe and feeling uncomfortable. They are not the same thing. Learning to tell them apart is a life skill, and this program will give you plenty of opportunity to practice.

Discomfort is a sign that you are growing.

When you try something you have never done before, your brain sends signals that feel a lot like danger. Your heart rate goes up. Your thinking gets foggy. You want to leave. For many neurodiverse students, this response is especially strong. Years of struggling in environments that weren't built for you can make your nervous system very good at sounding the alarm.

But discomfort is not the same as harm. Sitting in a class where you don't immediately understand the material is uncomfortable. Having a difficult conversation with a roommate is uncomfortable. Being asked to speak in front of a group, try a new social situation, or push through a hard

assignment when your brain wants to shut down — all of that is uncomfortable. None of it is unsafe. And almost all of it is exactly where growth happens.

The stretch zone (the space just outside what feels easy and familiar) is the most valuable real estate in your education. This program is designed to put you there. The staff around you are trained to support you while you're there. You are not expected to white-knuckle your way through discomfort alone. But you are expected to stay in it long enough to find out what you're capable of.

Safety is different, and it matters completely

Safety is not about comfort. Safety is about harm. You have the right to feel physically safe (free from violence, threat, and unwanted physical contact). You have the right to feel emotionally safe (free from harassment, discrimination, humiliation, and cruelty).

When those things are at risk, it is a safety concern and should be reported immediately. The difference between "this is hard, and I want to quit" and "something harmful is happening to me" matters, and it is worth learning to name accurately.

If you are not sure which one you are experiencing, that uncertainty itself is worth talking about. Any staff member can help you figure out where you are.

Questions worth asking yourself in the moment:

- Is someone actively hurting me, threatening me, or treating me in a way that violates my rights? **Safety concern. Tell a staff member now.**
- Am I struggling with something new, hard, or unfamiliar? **Discomfort. Stay in it. Ask for support.**
- Is my body telling me danger when my brain knows I'm actually okay? This is a common experience. Grounding strategies, staff support, and time usually help.
- Am I not sure? Talk to someone. That's what the staff are here for.

Both things can be true at once

Sometimes an experience is both genuinely difficult and genuinely unsafe. A situation that is hard *and* involves someone treating you badly. You don't have to choose one framing over the other. What matters is that you don't talk yourself out of reporting a real safety concern because you're worried about seeming "too sensitive." You also don't let the discomfort of growth convince you that you can't handle what this program is asking of you.

You can handle more than you think. And you don't have to handle any of it alone.

A note on this section for families

This distinction is worth discussing with your student before the program begins. Many neurodiverse adolescents, particularly those who have experienced school environments that were genuinely unsafe or invalidating, have nervous systems that have learned to treat unfamiliarity as a threat. Part of what this program offers is a genuinely safe environment in which students can begin to recalibrate that response.

Families can support this by:

- Encouraging students to name what they are experiencing rather than immediately seeking an exit.

- Resisting the urge to rescue students from discomfort during the first few days, which are typically the hardest.
- Trusting that program staff can distinguish between a student who needs support through difficulty and a student who needs intervention for a genuine safety concern.
- Reminding students — before they arrive — that hard feelings and growth feelings are often the same feeling.

Addenda & Changes Between Publications

Summary: Explains that the College may update handbook policies between annual publications and will notify students and families of any substantive changes, which supersede prior versions.

The student handbook is published by Landmark College annually. The College reserves the right to add, modify, or amend any part of this handbook between publication dates. The College will inform students, faculty, and staff of any changes to this handbook through various means. These changes will supersede any previously published policies on the same topic.

Student Rights & Responsibilities

This program exists because of a belief that neurodiverse students deserve a college experience that is built for them, not adapted around them. The policies in this section are the formal expression of that belief. They define how, as a student at Landmark College, you are entitled to protection from discrimination, access to support, privacy, fairness, and the right to be known as a whole person.

These are commitments the College makes to you from the moment you arrive, and expectations the College has of you as a member of this community. They apply in every space on this campus: in the classroom, in the residence hall, and in every interaction with every member of this community. Read them. Know them. And know that if you ever feel they have not been honored, there are people here whose job it is to make that right.

Student Rights

Summary: Outlines eleven specific rights students hold in this program, including protection from discrimination, access to support, academic fairness, privacy, and the right to a fair process if something goes wrong.

As a student in the Landmark College High School Summer Program, you have the right to:

Be treated with respect and fairness

You have the right to be treated without discrimination on the basis of sex, age, religion, creed, disability, race, color, ancestry, place of birth, sexual orientation, gender identity or expression, marital status, national or ethnic origin, or any other characteristic protected by applicable law. This applies to every aspect of your experience — academic, residential, and social.

Learn in an environment designed for your success

You have the right to a living and learning environment that supports your health, safety, and academic growth. This includes access to accommodations and support services appropriate to your needs. You share responsibility for helping maintain that environment for yourself and your peers.

Have your neurodivergent identity respected

You have the right to participate fully in this program as a neurodiverse learner. Your learning profile, diagnosis, and any accommodations you use are private information. No one — staff or peer — may share that information without your consent.

Know what is expected of you

You have the right to clear, accessible information about the program's rules, behavioral expectations, and conduct standards before you are held to them. If something is unclear, you have the right to ask — and to receive a genuine answer.

Disagree, question, and form your own views

You have the right to think critically, question ideas presented in class, and reserve judgment on matters of opinion — while still fulfilling the academic requirements of your courses. Intellectual disagreement, expressed respectfully, is part of learning.

Be evaluated fairly

You have the right to academic evaluation that is based on your performance and free from bias or favoritism. You are responsible for meeting the standards established for each course in which you are enrolled.

Speak up

You have the right to express your views — individually or collectively — on matters of program policy, community life, or your experience as a student. You may do so without fear of retaliation.

Seek support without fear

You have the right to ask for help — from residential staff, academic staff, health services, or counseling — without that act of help-seeking being used against you. Reaching out is not a sign of weakness and will not, by itself, result in disciplinary action or dismissal from the program.

Know who is looking out for you

You have the right to know that all High School Summer Program staff are mandated reporters under Vermont law, what that means for your conversations with them, and what limits exist on confidentiality. You also have the right to know who to contact in an emergency, and to have that information be easy to find.

A fair process if something goes wrong

If you are involved in a conduct matter or believe you have been treated unfairly, you have the right to a process that is transparent, consistent, and respectful — and to have your parent or guardian involved as appropriate. You have the right to submit a grievance if you believe a policy has been applied unfairly or a staff member has acted improperly.

Your privacy

You have the right to know how the College handles your education records, what your parent or guardian can access, and how medical and counseling information is protected. See the FERPA and Privacy sections of this handbook for details.

Student Responsibilities

Summary: Describes ten community responsibilities students are expected to uphold, including respectful conduct, honest communication, protecting peers' privacy, and engaging with accountability when addressed.

With rights come responsibilities. As a member of this community, you are expected to extend these same rights to every other student and to uphold the RUSH values (Respect, Understanding, Safety, and Honesty) in everything you do.

Being part of this program is not just an academic opportunity. It is a chance to practice the kind of person you are becoming - in how you treat others, how you handle difficulty, how you ask for help, and how you show up even when it is hard.

The responsibilities below are not a list of rules to memorize. They are a description of what genuine community membership looks like.

Treat every person with respect, including yourself

Respect means more than not being rude. It means recognizing that every person around you — peers, staff, dining hall workers, facilities staff, campus safety officers — has inherent worth and deserves to be treated with basic dignity. It also means treating yourself with respect: taking care of your health, your sleep, and your wellbeing is a responsibility, not a luxury.

In practice: Use people's names and pronouns correctly. Don't mock, imitate, or belittle others — in person or online. Disagree with ideas; don't attack people.

Work to understand yourself and others

This community includes people with different learning profiles, backgrounds, communication styles, and life experiences. You will not always immediately understand why someone does or says something the way they do. Your responsibility is to stay curious rather than judgmental, and to give others the same grace you hope they extend to you.

In practice: When something bothers you about a peer, ask yourself whether there might be an explanation you haven't considered. When you notice yourself making assumptions about someone, pause. Bring conflicts to staff early, before they calcify.

Take your learning seriously

You are here to learn in the classroom and outside it. That means attending every class and required activity, completing your work honestly and to the best of your ability, and engaging with the material even when it is difficult. Academic growth happens at the edge of your comfort zone, not inside it.

In practice: Be on time. Turn in your own work. Ask for help before you fall behind. Tell your instructor if something isn't working. They cannot help you if they don't know.

Contribute to a safe environment for everyone

Safety is a shared project. Every student has a role in making this community physically and emotionally safe. Not just for themselves, but for peers who may be more vulnerable, more anxious, or more easily overwhelmed than they appear. Safety also means not putting yourself in situations where your own well-being is at risk.

In practice: Follow curfew, check-in, and campus access policies — they exist because your safety matters. If you see something that worries you about a peer, say something to a staff member. Don't pressure others to break rules.

Be honest with staff, with peers, and with yourself

Honesty is the foundation of trust, and trust is what makes a community feel safe. This means being truthful in your academic work, in your interactions with staff, and in how you represent yourself and others. It also means being honest with yourself about when you are struggling and need support.

In practice: Don't lie to staff about your whereabouts, your behavior, or your wellbeing. Don't cover for a peer in a way that puts them at risk. If you make a mistake, own it. The cover-up is almost always worse than the original problem.

Protect others' privacy as you would want yours protected

Your peers' learning profiles, diagnoses, medications, personal histories, and struggles are not yours to share. What you learn about someone in this community, whether from a conversation, an observation, or a disclosure, stays here.

In practice: Don't post about peers without their consent. Don't share what you know about someone's disability or mental health with others. Don't take or share photos of people without asking first.

Communicate rather than avoid

Many conflicts in a residential community, whether with a roommate, a peer, or a staff member, grow larger because they go unaddressed. Your responsibility is to bring concerns forward, even when it feels easier to let them fester. You don't have to manage disagreements alone, and you shouldn't try to if your initial attempts to talk things through are not working.

In practice: Tell your roommate directly if something bothers you before going to staff. Tell a staff member if you don't feel safe doing so. Don't use a group chat, social media, or other students as intermediaries for conflicts that need a real conversation.

Follow the rules — and ask when you don't understand them

The policies in this handbook exist to protect students, ensure fairness, and make it possible for a diverse community of people to live and learn together. You are responsible for knowing and following them. If a rule seems unclear or unfair, the right response is to ask a staff member or use the grievance process, not to ignore the rule.

In practice: Not knowing a policy is not an excuse for violating it. If you are unsure whether something is permitted, assume it isn't until you ask.

Engage with feedback and accountability

Being held accountable, whether by a staff member, an instructor, or a peer, is not the same as being attacked. When someone points out that your behavior affected them, or when a staff member addresses a conduct concern with you, your responsibility is to listen, reflect, and respond honestly. Defensiveness is natural; letting it be your only response is a choice.

In practice: When a staff member speaks with you about your behavior, listen before you respond. You don't have to agree, but you do have to engage. If you believe you were treated unfairly, use the grievance process.

Represent this community, and yourself, with integrity

How you behave here reflects on you, on your peers, and on the program. This is especially true in shared campus spaces, in interactions with college-program students and staff, and online. You are a member of the greater campus community, and a representative of this program in every interaction you have within it.

In practice: Behave in dining halls, libraries, and outdoor spaces as you would want the program to be seen. If you make a mistake, own it and do better — that is integrity.

These responsibilities are not a ceiling on who you are expected to be. They are a floor — the baseline from which genuine membership in this community begins.

Student Protections

Vermont Mandatory Reporting Policy

Summary: Explains that all HSSP staff are mandated reporters under Vermont law, what they are required to report, the limits of confidentiality, and how students can report concerns about their own or a peer's safety.

Landmark College operates the High School Summer Program as a residential program serving students who are minors. For purposes of this handbook and the Landmark College High School Summer Program, a minor is any student who has not yet reached their 18th birthday.

All High School Summer Program staff, including residential life staff, faculty, program administrators, mental health therapists, health services personnel, and campus safety officers, are mandated reporters under Vermont law (33 V.S.A. § 4913).

Vermont law requires that any mandatory reporter who has reasonable cause to believe that a minor has been abused or neglected must report that belief to the Vermont Department for Children and Families (DCF). This obligation applies to all High School Summer Program staff and faculty regardless of whether they learned of the concern in a professional or personal capacity, and regardless of whether the student asks them to keep the information confidential.

If the alleged abuse is reported to have occurred outside the State of Vermont, mandatory reporters are responsible for making a report to the appropriate child protection agency or authority in the jurisdiction where the alleged abuse occurred, consistent with that jurisdiction's reporting requirements.

What Must Be Reported?

Staff are required to report reasonable suspicion of the following:

- Physical abuse or neglect
- Sexual abuse or exploitation
- Emotional or psychological abuse
- Neglect that endangers a child's health or welfare
- Any other harm or threatened harm to a child's health or welfare

Limits on Confidentiality — What Students Should Know

Students are encouraged to speak with program staff about any concerns, including concerns about their own safety or the safety of others. However, students should be aware of the following:

- High School Summer Program staff cannot promise complete confidentiality when a student shares information that suggests a minor may be at risk of harm.
- If a staff member learns of information that triggers a mandatory reporting obligation, they are required by Vermont law to report that information to the proper authorities, even if the student has asked them not to.
- When it is safe and appropriate to do so, staff will inform the student that a report is being made before or shortly after making it.

- Making a mandatory report does not automatically mean a student will be removed from the program or that any specific action will be taken against the student's family. Child Protection Agencies conduct their own review of all reports.

Reporting by Students

Students who have experienced abuse or neglect, or who have concerns about the safety of a peer, are encouraged to speak with any High School Program staff member, administration, Health Services staff, or Campus Safety.

Coordination with Title IX and Other College Policies

Mandatory reporting obligations under Vermont law are separate from and in addition to the College's Title IX obligations. A single incident may trigger both mandatory reporting to DCF and a Title IX investigation.

Access To Records (Notification Of Summer High School Program Students' Rights Under FERPA)

Summary: Explains that because most HSSP students are under 18, FERPA rights belong to their parents or legal guardians, who may access education records, and describes what records are and are not accessible.

The following is provided to satisfy the notice requirements of the Family Educational Rights and Privacy Act of 1974 ("FERPA") and is not intended to create contractual or other rights or remedies beyond any created by FERPA itself.

FERPA Rights for Minor Students

FERPA gives parents and legal guardians certain rights with respect to their children's education records. Because most High School Summer Program students are under 18 years of age, these rights generally belong to the student's parent or legal guardian, not to the student, for the duration of the program. These rights transfer to the student when they reach the age of 18. Students to whom the rights have transferred are "eligible students."

Parent, Guardian, and Eligible Student Rights

Parents and legal guardians of High School Summer Program students, or eligible students have the right to:

1. Inspect and review the student's education records within 45 days of the day the College receives a request for access. Parents, guardians, or eligible students should submit to the Registrar, Vice President of Student Affairs, or other appropriate official, a written request that identifies the record(s) they wish to inspect. The College official will make arrangements for access and notify the Parents or eligible students of the time and place where the records may be inspected. If the records are not maintained by the College official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.
2. Request the amendment of an education record that is believed to be inaccurate. Parents, guardians, or eligible students should write to the College official responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate. If the College decides not to amend the record as requested by the student, the College will

notify the Parents, guardians, or eligible students of the decision and advise the Parents, guardians, or eligible students of their right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided when notified of the right to a hearing.

3. Receive notice of, and in some cases consent to, the disclosure of personally identifiable information contained in the student's education records, subject to the exceptions described below.
4. File a complaint with the U.S. Department of Education concerning alleged failures by the College to comply with the requirements of FERPA. Complaints may be directed to the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW Washington, DC 20202-4605

Disclosure Without Consent

FERPA authorizes the College to disclose education records without consent in a number of circumstances, including:

1. Disclosure to school officials with legitimate educational interests. A school official is a person employed by the College (or in the case of the Board of Trustees, in service to the College) in an administrative, supervisory, academic or research, or support staff position (including security personnel and health staff, a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing their tasks.); A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibility.
2. Other schools to which a student is transferring;
3. Specified officials or companies with whom the College has contracted (such as an attorney, auditor, or collection agent);for audit or evaluation purposes;
4. Appropriate parties in connection with financial aid to a student;
5. Organizations conducting certain studies for or on behalf of the school;
6. Accrediting organizations;
7. To comply with a judicial order or lawfully issued subpoena;
8. Appropriate officials in cases of health and safety emergencies; and
9. State and local authorities, within a juvenile justice system, pursuant to specific State law.
10. Disclosure to parents of dependent students. If an eligible student is claimed as a dependent by either parent for tax purposes, then education records and information therefrom may be disclosed to either parent (whether custodial or not).
11. Disclosure to parents of eligible students regarding the student's violation of any law or College policy governing the use or possession of alcohol or a controlled substance, if the College determines that the student has committed a disciplinary violation with respect to such use or possession.
12. Disclosure of "directory information," unless the parent or eligible student objects to disclosure as provided below. "Directory information" is information included in a

student's educational records, the disclosure of which would not generally be considered harmful or an invasion of privacy. "Directory information" for purposes of this policy includes but is not limited to the following: a student's name, address, telephone listing, date and place of birth, major field of study, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees, honors and awards received, e-mail addresses, electronic or photographic images of a student, and the most recent previous educational agency or institution attended. If a student does not wish to have directory information disclosed without consent, they must so inform the Registrar in writing within 10 days of the start of any semester.

Health and Counseling Records

Records created by Health Services or Counseling Services staff in connection with the treatment of a student may be subject to different confidentiality protections under HIPAA and applicable state law, and may not be accessible through a FERPA request in all circumstances. Parents and guardians with questions about access to health or counseling records should contact the Director of Health Services, Director of Counseling Services, or the Vice President for Student Affairs.

Important Note on Confidentiality and Mandatory Reporting

FERPA rights to confidentiality do not supersede the College's mandatory reporting obligations under Vermont law. Please see the Mandatory Reporting Policy in this handbook for details.

Notice Of Non-Discrimination

Summary: States that Landmark College does not discriminate on the basis of sex, disability, race, religion, sexual orientation, gender identity, or any other protected characteristic in any aspect of program administration.

Landmark College follows all the applicable provisions of state and federal law which prohibit discrimination on the basis of sex, age, religion, creed, disability, ancestry, place of birth, race, color, sexual orientation, gender identity or expressions, marital status, or national or ethnic origin in the administration of its educational, admissions, financial aid, and employment policies and programs. The following persons have been designated to handle inquiries regarding the non-discrimination policies:

- **For Students:** Vice President for Student Affairs, Office of Student Affairs, Strauch Family Student Center, Landmark College, 19 River Rd South, Putney, Vermont, 05346, (802) 387-6713
- **For Faculty & Staff:** Director of Human Resources, Administration Building, Landmark College, 19 River Rd South, Putney, Vermont, 05346, (802) 387-6814.

Discrimination complaints are processed in accordance with the procedures set forth in Landmark College's [Anti-Harassment Policy](#). Complaints about sexual harassment, sexual misconduct, domestic and dating violence and stalking are handled in accordance with Landmark College's [Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence and Stalking Policy & Procedures](#).

Anti-Harassment Policy

Summary: Prohibits harassment of any student, staff member, or community member and establishes the College's commitment to investigating and addressing all reported incidents promptly and equitably.

Landmark College is committed to maintaining a campus environment where students are not subjected to bigotry and discrimination based on protected personal characteristics.

The following conduct is prohibited, either by law or this policy, on campus and within the College's programs:

1. **Discriminatory Harassment:** Harassment based on an individual's actual or perceived sex, sexual orientation, gender identity or expression, race, creed, color, ethnicity, national origin, religion, disability, marital status, age, pregnancy, or other characteristics as protected by applicable law.
2. **Sexual Harassment:** As defined by Title IX, including but not limited to sexual assault, domestic and dating violence and misconduct, sex-based stalking, and quid pro quo sexual harassment.

Landmark College defines harassment as verbal or physical conduct based on:

1. A student's protected personal characteristics outlined under discriminatory and sexual harassment definitions outlined above, and;
2. Where the conduct has the purpose or effect of creating an intimidating, hostile, or offensive educational or living environment for a reasonable person under the circumstances.

Such harassment may include, for example, repeated slurs, taunts in the guise of a joke, disparaging remarks, or physically threatening or inappropriate conduct, when such is directed at a person or group of persons because of their protected personal characteristics.

Landmark College recognizes that the protection of open expression and the open exchange of ideas are important to any academic community. This recognition is therefore an important element in the "reasonable person" standard used in judging whether harassment has occurred. This policy is meant neither to proscribe nor to inhibit discussion, in or out of the classroom, of complex, controversial or sensitive matters, when in the judgment of a reasonable person they arise appropriately and with respect for the dignity of others.

Landmark College also recognizes, however, that verbal conduct can be used specifically to intimidate or coerce and to inhibit genuine discourse, free inquiry, and learning. Such abuses are unacceptable.

If someone believes that another's speech or writing is offensive, wrong, or hurtful, they are encouraged to express that judgment in the exercise of their own open expression or to seek redress under the noted procedure(s) when appropriate.

Retaliation against a student for filing a complaint in good faith under this policy is strictly prohibited, and, if proven, would be considered a violation of this policy.

This policy is intended to protect all Landmark College students and applies to the conduct of Landmark College students, faculty, administrators, and staff. Any person who feels that they have been harassed or retaliated against as defined in this policy may file a formal grievance with the Vice President for Student Affairs, in accordance with the procedures outlined in the Grievance Policies and Procedures found within the Student Handbook.

Students should note that sexual harassment is also separately addressed in the College's Sexual Harassment Policy and Sexual Assault and Sexual Harassment Procedure.

Bias Incident Response

Summary: Defines bias incidents, explains how students can report them, and describes the College's response process, which may include restorative practices, education, and formal disciplinary action.

In bias incidents, harm is caused to individuals, groups, and the campus community. These Bias Incident Response Procedures are intended to promote a safe, inclusive environment by providing clear procedures for addressing bias incidents, ensuring support for victims, fostering accountability, and restoring the community to the best of its ability.

Definitions

1. **Bias** - Negative bias is a pre-formed negative opinion or attitude toward an individual or a group of individuals who possess common characteristics such as race, religion, ancestry, national origin, sexual orientation, gender identity, gender expression, mental or physical disability, or other categories protected by federal, state, or local statutes.
2. **Bias Incident** - Any verbal, written, physical, or psychological act that targets or demeans individuals or a group of individuals based on perceived race, religion, ancestry, national origin, sexual orientation, gender identity, gender expression, mental or physical disability, or other categories protected by federal, state, or local statutes. A bias act can create an unsafe or hostile environment or have a negative psychological, emotional, or physical effect on an individual, group, or community. To be considered a bias incident, the act is not required to be a crime under any federal, state, or local statutes, nor does it have to violate College policy. Bias incidents may occur regardless of whether the act is legal, illegal, intentional, or unintentional. The severity of a bias incident, and the College's response to incidents, can vary based on factors including context and behavior, location, pre-meditation, and whether the incident presents a threat to safety.
3. **Hate Crime** – As defined by Vermont law (13 V.S.A. § 1455), a hate crime is any crime maliciously motivated by the victim's actual or perceived race, color, religion, national origin, sex, ancestry, age, service in the armed forces of the United States, disability, sexual orientation or gender identity. Hate crimes may include attempted crimes. Common hate crimes include:
 - a. Assaults (hitting, punching, spitting)
 - b. Disorderly Conduct (public threatening behavior)
 - c. Unlawful Mischief (property crime)
 - d. Harassment by telephone (including repeated hang-up calls)

Response Procedures

When a bias-related incident occurs, the College will:

1. **Provide affirmation and support for affected individual(s)** - provide support for individuals and groups on campus affected by bias incidents, determine the type of response sought, and initiate an appropriate follow-up.
2. Address the behavior with the Responsible Party (either or both below)
 - a. **Educational conversation with the responsible party** – focus on ensuring the responsible party understands how and why their behavior caused harm. In such cases, the College will often arrange for an informal conversation with the responsible party to help them perspective take and understand the effect of their behavior on others.
 - b. **Conduct (Disciplinary) response** - Incidents that are determined to constitute discrimination, harassment, or retaliation will be addressed following the policies in the Student Handbook or Employee Manual, as appropriate. If an incident is determined to be a possible hate crime, the College will report it to the police and cooperate with them in investigating any hate crime as defined by the Vermont Hate-motivated Crimes statute (13 V.S.A. § 1455).
3. **Restorative circle or conference** - In some cases, affected individuals would like a space to explore and discuss the effect of an incident and how they will move forward. Restorative processes allow for naming harm, listening to and educating one another, and building, repairing, and/or restoring relationships and communities. Restorative processes can either be with affected individuals only (harm circles) or by bringing together affected individuals with the responsible party (restorative circles or conferences).
4. **Statement to the campus community** - In most cases, the effect of a bias incident is localized to the individual(s) present when a behavior happens. However, in some cases, the effect either expands to the broader campus community (often through various forms of media) or the incident occurs in a public space, and the responsible party is unknown. In such cases, the College may send a message to the campus community as soon as it is practical to name the incident and its effect and encourage impacted individuals to seek support. The College will consider the status of any ongoing investigation by the College or law enforcement and the privacy rights of involved parties when determining the timing of any community statements.

Reporting a Bias Incident

Students, faculty, staff, vendors, and visitors are strongly encouraged to report a bias incident to the College.

- For immediate assistance or in the case of an emergency, please contact Campus Safety at (802) 387-6899. (campus extension 6899).
- Reports can also be made to a member of the Residential Life Staff, the Director of the Centers for Diversity & Inclusion, the Dean of Campus Life, the Dean of Students, or the Vice President for Student Affairs.

If you have any questions about an alleged bias-related incident and the College's response, please feel free to contact or speak to the Vice President for Student Affairs.

Accommodations Policy and Procedures

Summary: Describes how students with disabilities may request formal ADA/504 accommodations, what documentation may be required, and how the College evaluates and implements approved accommodations.

Accommodations Policy Statement

Landmark College fully supports and recognizes the standards set forth in Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990, and similar state laws (“applicable law”), which are designed to eliminate discrimination against qualified individuals with disabilities.

Disabilities may include physical or mental impairments which substantially limit one or more of a person's major life activities, and which necessitate modifications to Landmark College’s facilities, programs, or services.

The College is committed to making reasonable accommodations for qualifying students, faculty, and employees with disabilities as required by applicable laws. The College is committed to making the campus and its facilities accessible as required by applicable law. The College cannot make accommodations that are unreasonable, unduly burdensome or that fundamentally alter the nature of the College’s programs or services.

The College will engage in the interactive process promptly and seek to implement approved accommodations in a timely manner.

The College’s full accommodations policy for the Summer High School Program can be found in [Appendix A](#) of this Student Handbook.

Students seeking certification must fill out an [Accommodation Request Form](#) and provide the information and documentation requested on the form and found in the full policy in [Appendix A](#) of this Student Handbook.

Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence, and Stalking Policy (Title IX Policy)

Summary: Defines prohibited sexual misconduct, explains reporting options, describes the formal complaint and investigation process, and outlines protections available to all parties including minor students.

As an educational institution, Landmark College is committed to promoting, through educational and consciousness-raising activities (including the distribution of policy), a campus environment where sexual misconduct is recognized as wholly intolerable, and where victims of sexual misconduct are provided with avenues of support and redress as appropriate.

In accordance with this commitment, the College has developed a policy on sexual misconduct, which is outlined in [Appendix B](#) of this Student Handbook. Other educational and consciousness-raising activities are conducted by the College’s Offices of Student Life.

The College is committed to taking action, and may be required to take action, if it learns of potential sexual misconduct, even if the person subjected to such misconduct does not wish to formally file a complaint.

The College prohibits a broad range of inappropriate sexualized activity through this sexual misconduct policy.

Additional Provisions for High School Summer Program Students

The Title IX policy of Landmark College applies in full to all students, including students enrolled in the High School Summer Program. The following provisions supplement that policy to address circumstances specific to HSSP students, who are minors under Vermont law, and to clarify how Title IX obligations interact with mandatory reporting requirements, Vermont's age of consent, and the rights of parents and legal guardians.

Mandatory Reporting and Title IX: How They Interact

Title IX and Vermont's mandatory reporting law (33 V.S.A. § 4913) are separate legal frameworks that can be triggered simultaneously by the same incident. HSSP staff who learn of conduct that may constitute sexual harassment or sexual misconduct involving a minor student are subject to both obligations, and both must be fulfilled.

In practice, this means:

- A staff member who receives a report of sexual misconduct involving an HSSP student must report that information to the Title IX Coordinator in accordance with the College's Title IX policy and to the Vermont Department for Children and Families (DCF) Intake line (1-800-649-5285) in accordance with Vermont mandatory reporting law.
- These two reporting obligations are independent. Completing one does not satisfy or eliminate the other.
- The College's Title IX Coordinator will coordinate the institution's response and communicate with DCF as appropriate.
- Students making a report should be informed at the outset that staff cannot promise confidentiality when a disclosure involves potential abuse or neglect of a minor, and that both Title IX and mandatory reporting obligations may apply.

Staff with questions about how these obligations apply in a specific situation should contact the Title IX Coordinator.

Vermont Age of Consent — Relevance and Limitations

Vermont's age of consent for sexual activity is 16 years old (13 V.S.A. § 3252). Because most HSSP students are 16 or 17, they are at or above Vermont's age of consent. However, the age of consent is legally distinct from, and does not limit or override, the following:

Title IX protections.

Title IX prohibits sexual harassment and sexual misconduct in educational programs regardless of the age of consent. Conduct that is legal under Vermont's age-of-consent statute may still constitute a Title IX violation if it creates a hostile environment, involves coercion, or involves a power differential between the parties.

Mandatory reporting obligations

Vermont's mandatory reporting law requires reporting of suspected abuse and neglect of minors under 18. The age of consent does not affect this obligation. A sexual interaction involving a 16 or

17-year-old HSSP student that gives rise to reasonable suspicion of abuse or exploitation must still be reported to DCF regardless of whether it falls within the age of consent.

College conduct policies

The College's own conduct standards — including the prohibition on relationships between HSSP students and college-program students or staff — apply independently of state law. An interaction that is legal under Vermont's age of consent statute may still violate College policy and result in disciplinary action.

Power differential considerations

Vermont law recognizes that age of consent does not account for power differentials. Sexual contact between an HSSP student and a Landmark College staff member, resident assistant, or employee is prohibited absolutely, regardless of the student's age, consent, or the nature of the relationship. Such contact constitutes a serious policy violation and will be reported to DCF and referred to law enforcement.

Parental and Guardian Rights in the Title IX Process

Because HSSP students are minors, their parents or legal guardians have rights in the Title IX process that differ from those of adult students. The College will:

- Notify a student's parent or legal guardian when a Title IX report is made involving that student, whether the student is a complainant or a respondent, unless doing so would endanger the student or is otherwise prohibited by law.
- Allow a parent or legal guardian to accompany a minor student to any meeting, interview, or proceeding held as part of a Title IX investigation or resolution process, in addition to any advisor the student selects.
- Provide copies of relevant notices, determinations, and written decisions to the parent or legal guardian of a minor student, in addition to the student.
- Consult with the student's parent or legal guardian when determining appropriate supportive measures for a minor complainant or respondent.

Parents and legal guardians do not replace the student as the party to a Title IX proceeding. The student's own account, wishes, and wellbeing remain central to the process. However, the College recognizes that minor students benefit from parental involvement and will facilitate that involvement at every stage unless there is a specific, documented reason not to do so.

Interactions Between HSSP Students and College-Program Students: Title IX Implications

The shared campus environment creates circumstances in which HSSP students and adult college-program students occupy the same spaces. The College takes seriously its obligation to protect minor students from sexual harassment and misconduct in those shared spaces, and the following provisions apply:

- Any sexual harassment or misconduct directed at an HSSP student by a college-program student or any adult on campus will be addressed under the College's Title IX policy and will also trigger mandatory reporting obligations under Vermont law.

- HSSP students who experience unwanted sexual attention, harassment, or contact from any person on campus — including college-program students, staff, or visitors — are encouraged to report immediately to any HSSP staff member, the Title IX Coordinator, or Campus Safety (802-387-6899).
- The College will implement supportive measures to separate the parties and protect the HSSP student's access to the program, regardless of whether a formal Title IX complaint is filed.

Confidentiality Limitations: Minor-Specific Notice

The full Title IX policy describes the confidentiality protections and limitations that apply to all students. HSSP students should be aware of the following additional limitations specific to their status as minors:

Staff members designated as confidential resources under the Title IX policy are still subject to Vermont's mandatory reporting obligations. A disclosure made to a confidential Title IX resource by a minor student may still result in a mandatory report to DCF if the disclosure gives rise to reasonable suspicion of abuse or neglect. Students should be made aware of this limitation before making a disclosure, to the extent practicable.

What Happens When You Report — A Quick Guide for HSSP Students

The full Title IX policy can be hard to follow. Here is what you need to know.

What is Title IX?

Title IX is a federal law that protects you from sexual harassment, unwanted sexual contact, stalking, dating violence, and any other sexual misconduct that affects your ability to participate in this program — by anyone on campus.

Who can I tell?

You can report to any HSSP staff member, the Resident Director, the Program Director, the [Title IX Coordinator](#), or Campus Safety (802-387-6899) at any time — and if you are in immediate danger, call 911 first.

What happens right after I report?

The person you tell will make sure you are safe, connect you with the Title IX Coordinator, and — because all staff are required reporters — notify both the Title IX Coordinator and, because you are a minor, your parent or legal guardian.

Will my parents find out?

Yes, in almost all circumstances, your parent or legal guardian will be notified — but if telling them puts you at risk for any reason, tell a staff member, and the College will work with you on how to handle that safely.

What is a mandatory report?

Vermont law requires staff to report suspected abuse or neglect of any minor to the Vermont Department for Children and Families (DCF at 1-800-649-5285), regardless of whether you ask them not to — this is separate from Title IX and both processes can happen at the same time.

What are my choices?

After a report, the Title IX Coordinator will explain your two options: requesting supportive measures to protect you without a formal process or filing a formal complaint that starts a structured investigation — and you do not have to decide immediately.

What does a formal investigation look like?

If you file a formal complaint, the College will conduct an investigation in which you share your account, are never required to confront the other person directly, may have a support person with you at every meeting, and will be kept informed throughout alongside your parent or guardian.

What if the person who harmed me is a college-program student or staff member?

Report immediately to any HSSP staff member or Campus Safety — steps to separate you from that person will be taken right away, and the mandatory report to DCF will apply automatically.

Will I get in trouble for reporting?

No — you will never be disciplined for making a good-faith report, and any retaliation against you for reporting is itself a violation that should be reported immediately.

What if I am not sure what happened to me counts?

Tell someone anyway — you do not need to know whether what happened meets a legal definition before you report, and you lose nothing by asking.

Title IX Coordinator

The Vice President for Student Affairs is the designated Title IX Coordinator for Landmark College and is authorized to and responsible for coordinating the College's efforts to comply with and carry out its responsibilities under Title IX.

The contact information for the Landmark College Title IX Coordinator is:

Michael Luciani, Vice President for Student Affairs

Landmark College

19 River Rd South

Putney, Vermont 05346

(802) 387-6713 mluciani@landmark.edu

The Title IX Coordinator is available to meet with students and employees as needed. References outlined in [Appendix B](#) of this Student Handbook that refer to the Title IX Coordinator should be read as also including designees of the Title IX Coordinator.

Student Chosen Names and Pronouns

Summary: Affirms the College's commitment to using students' chosen names and correct pronouns in all program interactions and explains how students may communicate their preferences to staff.

Landmark College recognizes that students may use names other than their legal names to identify themselves — whether a preferred nickname, a middle name, or a chosen name that best reflects their identity. As long as a chosen name is not used for the purpose of misrepresentation, the College will use it wherever possible throughout the program.

If a student has also indicated preferred pronouns, every effort will be made to honor those pronouns in all staff communication, written records, and interactions with the student from the first day of the program forward.

Students' chosen names and pronouns are collected through the program application and are used to set up program records, staff rosters, and the student's Landmark email account before arrival. Staff will be informed of each student's chosen name and pronouns during pre-program orientation and are expected to use them consistently.

Communicating with Families

The College will use a student's chosen name in all communication with families and outside parties unless a student has specifically requested otherwise, or legal documentation requires the use of a legal name.

Requesting a Change During the Program

Students who need to update their chosen name or pronouns after the program begins should speak directly with the Program Director or the Resident Dean. Because the program runs for three weeks and staff rosters and records are established before arrival, changes will be communicated to program staff as promptly as possible, though it may take a day or two for all staff to be informed.

Email display names may be updated during the program by contacting the IT Help Desk (example: Scout Finch <JeanLouiseFinch@landmark.edu>). The underlying email address and Landmark username cannot be changed once an account has been created.

Legal name changes require formal documentation and are processed through the Registrar's Office. This process is separate from the use of a chosen name and is not specific to the High School Summer Program.

Privacy & Dignity

Summary: Establishes students' right to privacy in their personal information, living spaces, and identity, and prohibits any conduct that violates the dignity of another community member.

While living in a community, it is important to maintain respect for the personal privacy and dignity of students and staff. To the extent that the physical layout of the bathroom, shower, and living areas permit, the privacy and personal dignity of students shall be respected by all members of the community. Unwarranted peer intrusions on a student's right to such privacy shall be considered a violation of the program's disciplinary code.

Health, Wellness, and Safety

Mental Health Support & Crisis Response

Summary: Describes when and how to seek mental health support, what to do if a peer is in distress, how to respond in a mental health emergency, and what happens after a student asks for help.

Landmark College is committed to the mental health and well-being of every student in the High School Summer Program. We recognize that living away from home for the first time, navigating a new academic environment, and building new peer relationships can be exciting, but also challenging. Feelings of anxiety, homesickness, sadness, or overwhelm are normal, and support is available.

When to Seek Help

Students are encouraged to speak with an High School Summer Program staff member any time they are struggling, regardless of whether the concern feels "serious enough." You do not need to be in crisis to ask for support. Common reasons students seek support include:

- Feeling homesick, anxious, or overwhelmed
- Difficulty sleeping or managing daily routines
- Conflict with a roommate or peer
- Feeling isolated, excluded, or like they don't belong
- Sadness, hopelessness, or loss of interest in activities
- Feeling like they might want to hurt themselves

Who to Talk To

Students can reach out to any of the following people at any time:

- Any High School Summer Program residential staff member (Directors, Assistant Directors, Resident Directors, Resident Assistants, Program Assistants, or Night Proctors).
- Health Services staff
- Program administrators
- Campus Safety (available 24/7 at 802-387-6899)

If You Are Concerned About a Peer

If you are worried about another student, whether because of something they said, a change in their behavior, or a direct disclosure, please tell an staff member immediately. You do not need to know whether the concern is "serious enough." You do not need to have all the information. Your job is to tell staff members who are trained to help.

Important: Please do not promise a peer that you will keep a safety concern secret. A genuine friend gets help. If a peer tells you something that worries you and asks you not to tell, you can say: "I care about you, and I need to tell someone who can help."

In a Mental Health Emergency

A mental health emergency is a situation where a student appears to be at immediate risk of harming themselves or others, is unable to keep themselves safe, or is experiencing a significant break from reality. If you believe a student is in immediate danger:

1. Stay with the student if it is safe to do so.
2. Get a staff member or contact Campus Safety immediately at (802) 387-6899.
3. Do not leave the student alone.

Student Safety or Threat of Harm to Others

Summary: Outlines the College's administrative response when a student poses a potential threat to their own safety or the safety of others, including interim measures and notification procedures.

If the College determines that there is a reasonable basis to believe, based on an individualized assessment of the student's behavior and other relevant information:

- that the student's medical, psychological, or substance use-related condition prevents them from safely and/or effectively participating in the College's academic or residential life programs, such that the student is not otherwise qualified to attend the College; or
- that the student poses a significant risk to the health or safety of others; or
- causes or threatens to cause property damage; or
- engages in behavior that is unduly disruptive to others in the Landmark College community (behavior that is "unduly disruptive" includes but is not limited to conduct that interferes with, or poses a significant risk of interference with, the emotional or physical well-being of others and/or the academic, extracurricular, or social activities of others)

then the College will exercise its discretion to take steps that it deems reasonable and necessary in the best interests of the student and/or the College community. Such steps may include, by way of example but not limitation: interim or longer-term disciplinary or administrative withdrawal from the College (either with or without the invocation of the College's student disciplinary process, as deemed appropriate under the circumstances); psychological assessment(s); parental notification; periodic assessment requirements; and/or related documentation requirements.

While preliminary decisions may have to be made quickly and without discussion with the student in certain circumstances, student(s) will be given notice and an opportunity to speak with the Vice President for Student Affairs or their designee prior to any final decision being made by the College. The Vice President may also consult with others as appropriate (e.g., medical professionals, members of the College's Students of Concern Team, other College officials, law enforcement, and/or the student's family members).

The Vice President may also consider whether there are reasonable accommodations that would effectively mitigate the risk of harm to others or property and would allow the student to safely and effectively participate in the College's academic programs and the residential life of the College, as applicable.

Students may petition for readmission to the College as provided under the terms and conditions specified in any notices regarding decisions made by the College pursuant to this policy.

Steps taken by the College pursuant to this policy may be appealed, following the procedures set forth in the College conduct process.

The College reserves its right to modify steps taken or requirements imposed under the circumstances described above, where modifications appear to be necessary in the best interests of the student and/or the College community.

Immunization Policy for High School Program Participants

Summary: States immunization requirements for participation in the residential program and explains how families must document compliance before the program begins.

To protect the health and safety of all members of the Landmark College community, all students enrolled in the High School Summer Program are required to comply with the **Vermont State Immunization Requirements for Postsecondary Institutions**.

Required Immunizations include:

1. Measles, Mumps, and Rubella (MMR): Two doses
2. Varicella (Chickenpox): Two doses or documentation of disease
3. Tetanus, Diphtheria, and Pertussis (Tdap): One dose within the last 10 years
4. Hepatitis B: Three doses
5. Meningococcal (ACWY): One dose (required for students living in campus housing if under age 22)
6. Tuberculosis (TB) Screening/Testing.

Important Note:

- Proof of immunization must be submitted before or at registration.
- Students who do not submit complete documentation of required immunizations (or exemptions) by Registration Day will not be permitted to move into the residence halls or participate in the program until compliance is met.

Students who qualify for a medical or religious exemption must submit appropriate documentation in advance. Landmark College reserves the right to evaluate exemption requests in accordance with Vermont state law and public health guidelines. Note: In the unlikely event of an outbreak of any of the above diseases, unvaccinated students may be required to isolate or depart campus.

If you have questions about immunization documentation or need assistance, please contact the Health Services Office before arrival at HealthServices@landmark.edu or HSNurse@landmark.edu

Prescription Medication

Summary: Requires all medications to be pre-packaged by a licensed pharmacy in labeled multi-dose pouches, turned in to Health Services at registration, and dispensed daily by nursing staff throughout the program.

Health Services nursing staff manage and dispense all prescription medications for HSSP students throughout the program, seven days a week, with medication passes at 7:30 AM and 10:00 PM daily. Before the program begins, all medications must be pre-packaged by a licensed pharmacy in labeled multi-dose strip pouches or blister packs — loose pills, baggies, handwritten bottles, or parent-packed supplies will not be accepted at registration.

All prescriptions must be submitted to the packaging pharmacy at least 30 days before the program start date, and families are responsible for any associated costs, copays, or late fees. Students arriving on the first day should retain the medications they need for that day only, then turn all remaining medications in to Health Services at registration; students may keep emergency medications (EpiPens, inhalers, and other emergency-use items) on their person at all times, provided those medications are documented on the student's health forms. Any modifications to dosage instructions, such as "as needed" or "not on weekends," must be accompanied by a physician's note or updated prescription label, and Health Services staff will dispense all medications strictly in accordance with the original prescription directions.

Families and students are responsible for collecting any unused medications at the program's conclusion; items left behind will be returned by mail at the family's expense.

Alcohol & Other Drug Policies

Summary: Prohibits the possession, use, or distribution of alcohol, cannabis, and other unauthorized substances, and describes consequences for violations, including mandatory reporting obligations for minor students.

The College prohibits the possession, use, or distribution of alcohol and illegal drugs on campus. The College will address any behavior relating to alcohol and other drugs as outlined below:

- **Possession of alcohol or illegal drugs on campus:** Students who are found to possess, use, distribute, or transport alcohol or illicit drugs on campus will be subject to suspension or expulsion. The College reserves the right to consider the presence of smoke or odors as a violation of this policy.
- **Misuse of Prescription Medication:** Students who are found to be sharing, selling, or trading prescription medications on campus, or abusing or misusing their own prescription medications on campus will be subject to sanctions ranging from Disciplinary Probation to suspension or expulsion from the College.
- **Being under the influence of alcohol or other drugs on campus:** Students who are found on campus under the influence of alcohol or illicit drugs will be subject to disciplinary action up to and including suspension or expulsion.
- **Drug Paraphernalia:** Drug paraphernalia, regardless of intended use, is not allowed on campus.
- **Alcohol Containers:** Empty alcohol bottles, cans, bottle tops, and other containers are not allowed on campus, even for decorative purposes.

Students found to violate these policies will be subject to sanctions up to expulsion from the program.

Cannabis (Marijuana)

The use, possession, or cultivation of cannabis or any substance containing THC (the psychoactive component in cannabis) is not allowed on the Landmark College campus, within any program at Landmark College, or at any college-sponsored event or activity off campus.

Despite changes in state laws, federal laws (including the Controlled Substances Act and the Drug-Free Schools and Communities Act) prohibit cannabis use, possession, and/or cultivation at

educational institutions and on the premises of recipients of federal funds. Therefore, even students with prescriptions for medical marijuana/cannabis/THC products will not be able to possess or use these substances on the Landmark College campus.

Prescription Medications

Students who are found to be sharing, selling, or trading prescription medications on campus, abusing or misusing their own prescription medications on campus, or misusing any medications allowed to be in student possession (i.e. topical creams and inhalers) will be subject to sanctions ranging from Disciplinary Probation to suspension or expulsion from the College.

Tobacco Products, Substitutes, and Paraphernalia

It is a violation of Vermont State law for persons under the age of 21 to possess, purchase, or attempt to purchase tobacco products, tobacco substitutes, or tobacco paraphernalia.

1. **Tobacco products** include cigarettes, little cigars, roll-your-own tobacco, snuff, cigars, and new smokeless tobacco.
2. **Tobacco substitutes** include products, including electronic cigarettes or other electronic or battery-powered devices, that contain or are designed to deliver nicotine or other substances into the body through the inhalation of vapor and that have not been approved by the U.S. Food and Drug Administration for tobacco cessation or other medical purposes.
3. **Tobacco paraphernalia** includes any device used, intended for use, or designed for use in smoking, inhaling, ingesting, or otherwise introducing tobacco products into the human body, or for preparing tobacco for smoking, inhaling, ingesting, or otherwise introducing into the human body, including devices for holding tobacco, rolling paper, wraps, cigarette rolling machines, pipes, water pipes, carburetion devices, bongs, and hookahs.

Due to the nature of the High School Summer Program all students, regardless of age, will not be permitted to use or possess tobacco products, tobacco substitutes, or tobacco paraphernalia for the program's duration.

Any student in the High School Summer Program who may have difficulty with smoking cessation or tobacco product dependency during the program may consult with the nursing or residential staff.

Weapons

Summary: Prohibits the possession of weapons of any kind on campus or in residence halls and describes the College's response to violations, including removal from the program and referral to law enforcement.

The use and possession of weapons, including firearms, ranged weapons, ammunition, explosives, and knives are prohibited on Landmark College property and College-sponsored events and programs on or off campus.

The College defines a weapon as:

- **Firearm** – any device, loaded or unloaded, which will expel a projectile by the action of an explosive. This includes (but is not limited to): a BB gun, pellet gun, paintball gun, handgun, rifle, machine gun, shotgun, or other instruments that discharge a projectile.

- **Ranged Weapons** – any device using elastic, spring action, or pneumatic components to launch a projectile. This includes bows, crossbows, and slingshots.
- **Ammunition** – any ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.
- **Explosive** - any material, liquid, or substance that causes a sudden, instantaneous release of air, pressure, gas, and heat, including pressure devices, bombs, grenades, rockets, and fireworks.
- **Knives and blades** - Only non-automatic pocketknives with blades less than three inches will be permitted on campus. Other knives, swords, hatchets, axes, and other bladed instruments are not permitted.
- **Other objects** - other objects that have been designed (or used in a manner) with the intent to inflict bodily harm or physical damage to property. Examples include tasers, baseball bats, throwing stars, hammers, etc.

All weapons found on campus will be confiscated. Students possessing such weapons will be subject to immediate disciplinary action up to and including dismissal from the College or arrest.

This policy applies to all faculty, staff, students, employees, and visitors on Landmark College property, including those who have a valid permit to carry a concealed weapon. This policy shall not apply to a law enforcement officer while engaged in law enforcement duties.

Fighting & Violence

Summary: Prohibits physical violence, threats of violence, and intimidation in any form, and establishes that any incident involving physical altercation will result in immediate disciplinary action.

The College prohibits all manner of violent behavior and may pursue disciplinary action against any student who engages in violent behavior in any form, including physical or verbal abuse, harassment, physically abusive relationships, damage to property, use of a knife (regardless of size) or other weapon or instrument in a violent or threatening manner, and fighting (even in mutually instigated cases).

Each student has the responsibility to find a peaceful solution to interpersonal problems. This should include notifying appropriate program staff if the student feels they are being intimidated, threatened, verbally coerced or abused by another individual.

Community Standards & Conduct

Standards of Conduct

Summary: Introduces the RUSH values framework — Respect, Understanding, Safety, and Honesty — as the foundation for all community expectations and the lens through which conduct decisions are made.

Students enrolled in the High School Summer Program at Landmark College are expected to treat other members of the program and College community with respect and courtesy and follow the College's core values of Respect, Understanding, Safety, and Honesty (the **R.U.S.H** values). The following standards of conduct are examples and general expectations for all student members of the Landmark College community:

1. **Respect:** Students will show respect for:
 - a. the feelings, time, efforts, and physical well-being of others, and for their capacity for growth.
 - b. the rules and regulations of Landmark College and its governing bodies, and the laws of the State of Vermont and of the United States.
 - c. the property and materials of Landmark College as well as the personal property of all members of the Landmark community.
2. **Understanding:** Students will make a commitment to understand their own strengths and challenges, as well as those of others, and to work towards academic and personal growth.
3. **Safety:** Students will make a commitment to contribute to a safe, clean, congenial, and productive living & learning environment.
4. **Honesty:** Students will exhibit honesty in academic endeavors and in all aspects of campus life

Community Living Expectations

Summary: Provides explicit day-to-day behavioral expectations for dining, hallways, shared spaces, roommate relationships, free time, and transitions between activities, written with neurodiverse learners in mind.

Living in community with others is one of the most valuable — and most challenging — parts of the High School Summer Program experience. For many students, this may be the first time they have shared a living space, managed their own schedule, and navigated social life without the support structures of home. This section describes the day-to-day behavioral expectations that help our community function with respect, fairness, and care for one another.

Landmark College's RUSH values — Respect, Understanding, Safety, and Honesty — apply in all shared spaces and in all interactions, from the dining hall to the hallway to the bathroom.

Dining Hall

- Wait in line patiently and allow others to move through the line without being rushed.
- Clean up after yourself: return trays, dispose of waste, wipe tables if needed.
- Be mindful of the volume of your conversations. The dining hall can be a noisy and overstimulating environment for some students.
- Be considerate of peers with dietary restrictions, food allergies, or sensory sensitivities. Do not comment on or question what others are eating.
- Sitting alone is okay. Forcing others to move or join groups is not.

Hallways and Common Areas

- Move through hallways at a reasonable pace and volume, particularly in the early morning and late evening.
- Knocking before entering or approaching a closed door is a basic courtesy — even for communal spaces like lounges.
- Common areas and lounges are shared by all residents on the floor. No individual student or group has priority over these spaces.
- Do not block doorways, hallways, or stairs for extended periods.

- Clean up after yourself in any common area, including lounges, kitchenettes, and bathrooms.

Bathrooms and Personal Hygiene Spaces

- Shared bathrooms are shared. Leave them as clean as you found them.
- Be conscious of time in the shower, particularly during high-demand periods in the morning.
- Do not leave personal items in shared bathroom spaces.
- Respect others' privacy completely in bathrooms and changing areas.

Transitions Between Activities

- Move promptly between classes, activities, and meals. Chronic lateness affects the entire group and may result in staff follow-up.
- If you are unsure where to go or when, check with a staff member rather than wandering independently.
- Transitions can be difficult. If you need a moment to collect yourself between activities, tell a staff member you need a minute...do not just disappear.

Roommate Relationships

- Communicate with your roommate about shared preferences: lights out time, study vs. social time in the room, guests in common spaces.
- If a roommate conflict arises, bring it to a residential staff member early — before it escalates. Staff are trained to help mediate roommate differences.
- Respect your roommate's belongings, space, and right to a quiet room.
- No one other than the assigned residents may be in a residential room. See the Guests policy.

Free Time

Free time is a structured part of the program. During free time, students are expected to remain in High School Program-approved areas of campus, check in with residential staff before and after any solo activity (such as jogging), and be prepared to account for their whereabouts. Free time is not unmonitored time. Staff are present and available.

Social Media and Online Conduct Policy

Summary: Requires that online conduct meet the same standards as in-person conduct, addresses photography consent, prohibits cyberbullying and peer harassment, and protects students' disability and personal information online.

Mobile devices and social media are a routine part of modern life, and this program does not ask you to leave that part of yourself at the door. What it does ask is that you bring the same standards of respect, honesty, and care to your online behavior that are expected of you in person. Online conduct that harms a peer is not less serious because it happened on a screen.

This policy applies to your use of personal accounts, personal devices, and any online platform or application — including but not limited to Instagram, Snapchat, TikTok, BeReal, Discord, iMessage, WhatsApp, and any platforms that emerge during the program period. It applies whether or not you are on campus, and whether or not the conduct occurs during a scheduled program activity.

Photography and Video of Peers

Being part of a community means that you will sometimes appear in the background of someone else's photo, be captured in a group shot at a program event or be visible in images of shared spaces. That is a normal part of life in any community, and this policy does not require consent for every incidental image.

What it does require is that you treat your peers with the same respect in digital spaces that you are expected to show them in person.

In Public and Shared Spaces:

Students may photograph and record general program activities, campus spaces, events, and shared experiences. When other students appear incidentally in those images — in the background of a campus shot, as part of a group at an activity — explicit consent is not required for the photograph itself.

In Private Spaces

Students may never photograph, video record, or screen-capture other students in bathrooms, changing areas, residential rooms, or any other space where a person has a reasonable expectation of privacy. This prohibition is absolute and applies regardless of consent.

Before You Share

The most important rule in this policy is not about taking images, it is about sharing them. Consent is required before you post, send, or distribute any image or video in which another student is clearly identifiable as a primary or prominent subject.

Before sharing images, ask yourself two questions:

1. Would this person be comfortable seeing this shared publicly? and
2. Have I asked them?

If the answer to either question is uncertain, ask before you share, not after. Especially:

- If another student is the clear subject or focus of an image, ask before sharing it, even if you had every right to take it.
- If an image captures someone in a moment they might find embarrassing, unflattering, or private (even in a public space) ask before sharing it.
- If you are tagging, mentioning, or otherwise identifying a student in a post, that student's consent is required regardless of whether the image itself is permissible.

The ask takes three seconds. The harm from not asking can last much longer.

Prohibited Online Conduct

The following conduct is prohibited and will be addressed through the program's disciplinary process:

- Posting, sharing, or distributing content that demeans, humiliates, threatens, or harasses another student, staff member, or member of the Landmark community — including content created by someone else that you forward or amplify.
- Using any platform to exclude, intimidate, or coordinate the social exclusion of a peer.

- Creating fake accounts, impersonating peers or staff, or using anonymous platforms to harass.
- Posting any content — including memes, screenshots, or comments — that references another student's disability, diagnosis, medication, learning profile, or other personal information without that student's explicit consent.
- Tagging, mentioning, or otherwise identifying a student in content that could embarrass or harm them without their consent.
- Failing to remove content when asked to do so by program staff under the Program-Related Content provision below.

Program-Related Content

Students are expected to represent themselves and the program with integrity in any public or semi-public online space during the program period. Landmark College reserves the right to ask students to remove online content that violates this policy or that materially misrepresents the program, and failure to comply with such a request may result in disciplinary action.

Reporting Online Misconduct

Students who experience online harassment, inappropriate content, or other online conduct that violates this policy should:

1. Screenshot or preserve the content as evidence before reporting.
2. Report the conduct to an High School Summer Program staff member, the Resident Director, or college administrator.
3. Know that they will not be penalized for reporting in good faith.

Consequences

Violations of this policy will be addressed through the program's disciplinary process described in this handbook. Depending on severity, consequences may include a required conversation and educational response, loss of device privileges, notification of parents or guardians, and suspension or dismissal from the program for serious or repeated violations.

Policy On Relationships and Public Displays of Affection

Summary: Establishes expectations for respectful interpersonal relationships among students and defines appropriate conduct in shared and public spaces on campus.

Landmark College recognizes that for many students, participation in this program may be their first extended time away from home. The residential nature of the program naturally fosters close connections, and students may experience a range of relationships—from deep friendships to feelings of romantic interest or attraction. As adolescents and emerging adults, students are learning to develop mature, healthy, and responsible relationships with their peers.

We believe that mutual trust, respect, and honest communication are the foundation of any positive relationship. At the same time, Landmark College has an obligation to uphold the safety, comfort, and well-being of all students within the community.

To support a respectful living and learning environment, the following expectations are in place:

1. **Public displays of affection (PDA)**—including but not limited to kissing, prolonged hugging, or intimate touching—are not permitted in classrooms, residence halls, or public spaces.
2. Students should remain mindful that others may feel uncomfortable witnessing certain types of physical affection, regardless of intent.
3. **Sexual activity is not condoned** among high school students in this program. Any incident involving sexual activity will be documented and reported through an incident report, and appropriate follow-up will occur.

Landmark College’s primary concern is the health and well-being of each individual and the community as a whole. Students are encouraged to speak with a residential staff member or program leader if they have questions or concerns about peer relationships, boundaries, or social dynamics.

Anti-Hazing Policy

Summary: Prohibits all forms of hazing in connection with any program activity or group, defines hazing broadly, and establishes reporting procedures and sanctions consistent with Vermont law and federal requirements.

Landmark College believes that all students have a right to a safe and healthy living and learning environment. As a result, the College supports only those activities that are educational, constructive, and contribute to the intellectual and personal development of students.

The College unequivocally opposes and will not tolerate hazing, as defined below, and it prohibits hazing, whether by an individual or an organization. This Policy and the programs identified below aim to prevent hazing, promote a safe, respectful environment that does not include hazing, and ensure compliance with the federal Stop Campus Hazing Act (“SCHA”) as well as other applicable laws and College policies.

As a matter of college policy, Landmark College prohibits:

1. Hazing as defined by the federal Stop Campus Hazing Act (SCHA), and
2. Hazing as defined by applicable Vermont hazing statutes, which definition is stated in the Vermont Hazing Statutes section of this Policy, below.

The SCHA amended the Jeanne Clery Campus Safety Act 20 U.S.C. § 1092(f), and its implementing regulations at 34 C.F.R. § 668.46 (collectively, the “Clery Act”) to include provisions related to hazing. The Clery Act is a federal law that requires Title IV federally subsidized institutions of higher education to disclose certain crime, fire, safety, and hazing information in publicly available locations.

Policy Scope

This Policy applies to all Landmark College students, faculty, and staff, and covers conduct that occurs on or off campus.

Definitions

Hazing - Hazing, as defined in the SCHA, is any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons, regardless of the willingness of such other person or persons to participate, that:

1. is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and
2. causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including:
 - a. whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
 - b. causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
 - c. causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
 - d. causing, coercing, or otherwise inducing another person to perform sexual acts;
 - e. any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
 - f. any activity against another person that includes a criminal violation of local, State, or Federal law; and
 - g. any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, or Federal law.

Student Organizations - A Student Organization, for purposes of this Policy, is an organization at Landmark College (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the College, whether or not the organization is established or recognized by the College.

Prohibited Conduct

The following conduct is prohibited by this Policy:

1. Engaging in the hazing of others or assisting in such hazing;
2. Failing to report hazing incidents or activities when required to do so;
3. Soliciting, directing, aiding, or otherwise participating actively or passively in the sorts of acts described in this Policy.
4. Retaliating against individuals who report potential hazing incidents or activities.

Hazing either on or off the College's campus is prohibited equally. Purported consent of individuals being subjected to hazing is not a defense to disciplinary action under this policy, given the socially coercive nature of hazing activities.

Reporting and Investigation

All members of the Landmark College community are encouraged to report possible hazing incidents to the Vice President for Student Affairs for investigation and/or referral to other College processes. If the potential hazing occurs in the context of the High School Summer Program, the College encourages reporting to a member of the High School Summer Program staff.

Landmark College Campus Security Authorities (“CSAs”) are required to inform the Vice President for Student Affairs or designee of any and all information they receive about potential hazing as defined by the SCHA, as stated above, within 24 hours of their receipt of the information. A CSA is any Campus Safety personnel; other individuals who have responsibility for campus security, but who do not work for Campus Safety (including contracted security providers); individuals or offices designated by the College as those to whom crimes should be reported; or officials who have significant responsibility for student and campus activities outside of the classroom. If a person is not sure whether they are a CSA, they should contact the Vice President for Student Affairs.

To report any incident of potential hazing, please contact the Vice President for Student Affairs or a designee, including the Dean of Students, Dean of Campus Life, Director of Campus Safety, or Resident Dean.

Reports may be submitted anonymously, but anonymous reports can limit the College’s ability to investigate and respond. The more information that is provided, the more likely the issue can be addressed fully.

Reports involving students as respondents will be investigated and/or addressed by the Dean of Campus Life or Vice President for Student Affairs under the College’s [Formal Disciplinary Procedures](#) outlined in the Student Handbook. Reports involving staff or faculty as respondents will be referred to Human Resources and investigated and/or addressed under applicable policies and procedures. Reports will be additionally referred for consideration to other College departments (e.g., Athletics, Residential Life, Student Involvement/Activities, Academic Affairs, etc.), for investigation and/or disciplinary or other action as deemed appropriate at the College’s discretion.

Information about reports of hazing will also be provided to Landmark College Campus Safety to enable compliance with the College’s obligations under the Clery Act.

The College will publish a Campus Hazing Transparency Report as required by the SCHA.

[Sanctions](#)

Any individual, group, or organization found responsible for hazing will be subject to the student conduct process, which may result in relocation from on campus housing, suspension, dismissal, or revocation or suspension of College recognition or permission to operate or exist within the College’s purview if that organization knowingly permits, authorizes, or condones hazing, or such sanctions are otherwise deemed appropriate by the College. Faculty and staff found responsible for hazing may be subject to sanctions up to and including termination of employment. Members of student organizations may be held individually responsible for violations, even if the group or organization itself is not formally sanctioned. Sanctions may also include required participation in educational programs such as those related to hazing prevention, ethical leadership, or restorative practices. Any sanction imposed on a student organization will be included in the College’s Campus Hazing Transparency Report.

Reporting to Law Enforcement

Circumstances under which the College will report hazing to a law enforcement agency or agencies include, but are not limited to, circumstances in which in its judgment, the nature of the allegations and/or findings suggest that the hazing activity, if it occurred or is occurring, presents a serious risk of harm to students or other persons, or involves a potentially serious violation of law.

Resources and Supports

The College has published a list with a variety of campus-wide resources for those who have experienced issues such as hazing or similar misconduct. Confidential or private/respectful support is available through the following offices:

Confidential On-Campus Resources

Meg Spicer, Director of Counseling Services	(802) 387-6701
Jeff Huyett, Director of Health Services	(802) 387- 6753
Counseling Services	(802) 387-1636

Respectful and Discreet but Not Necessarily Confidential On-Campus Resources

Resident Directors	
Campus Safety	(802) 387-6899
Michael Giannetto, Director of Campus Safety	(802) 387-1689
Scott Ansevin-Allen, Dean of Campus Life	(802) 387-6411
Craig Marcus, Dean of Students	(802) 387-6362
Michael Luciani, Vice President for Student Affairs	(802) 387-6713
Allison LeDuc, Director of Human Resources	(802) 387-6814

Off-Campus Community Resources

Windham County Sheriff	(802) 365-4949
Vermont State Police	(802) 722-4600

The department(s) handling the matter can provide additional referral, resources and supports as appropriate.

Statement of Policy Regarding Hazing Prevention and Awareness Programs

Through the publication of this Anti-Hazing Policy and its awareness and prevention programs related to hazing, Landmark College seeks to promote understanding and intolerance of prohibited hazing behaviors in the College community.

Landmark College is committed to proactive, research-informed efforts to prevent hazing in its community. The College will offer campus-wide prevention and awareness programs that are designed to reach students, faculty, and staff. These efforts will include, but are not limited to, the following:

1. Primary prevention strategies, such as training on the negative consequences of hazing, the importance of mutual respect, the promotion of healthy group dynamics and how to build group cohesion without hazing, skill building for bystander intervention, information about ethical leadership, and how to identify and stop hazing before it occurs.
2. Focused interventions for high-risk groups.

3. Publication of findings of responsibility, consistent with the Campus Hazing Transparency Report requirements of the SCHA.
4. Ongoing assessment and adaptation of anti-hazing awareness and prevention programs based on evidence and emerging best practices.

The College's awareness and prevention programs are adopted and led by the offices of the Vice President for Student Affairs, Dean of Students, Director of Student Involvement, and Athletic Director.

Vermont Hazing Statutes

Title 16 V.S.A. § 178 provides in pertinent part that the Board of Trustees or other governing body of each postsecondary school operating in Vermont shall adopt and ensure enforcement of a policy prohibiting hazing, which shall define hazing in a manner that is at least as stringent as the definition contained in 16 V.S.A. § 11(a)(30).

Definitions under Title 16 V.S.A. § 11(a)(30):

Hazing - any act committed by a person, whether individually or in concert with others, against a student in connection with pledging, being initiated into, affiliating with, holding office in, or maintaining membership in any organization that is affiliated with an educational institution; and that is intended to have the effect of, or should reasonably be expected to have the effect of, humiliating, intimidating, or demeaning the student or endangering the mental or physical health of a student.

Hazing also includes soliciting, directing, aiding, or otherwise participating actively or passively in these acts. Hazing may occur on or off the campus of an educational institution.

Hazing shall not include any activity or conduct that furthers legitimate curricular, extracurricular, or military training program goals, provided that:

1. the goals are approved by the educational institution; and
2. the activity or conduct furthers the goals in a manner that is appropriate, contemplated by the educational institution, and normal and customary for similar programs at other educational institutions.

Organization - means a fraternity, sorority, athletic team, association, corporation, order, society, corps, cooperative, club, or other similar group, whose members primarily are students at an educational institution, and that is affiliated with the educational institution.

Pledging - means any action or activity related to becoming a member of an organization.

Anti-Bullying Policy

Summary: Prohibits repeated harmful conduct intended to intimidate, exclude, or demean any student, and establishes procedures for reporting and responding to bullying in all its forms.

Landmark College believes that all students have a right to a safe and healthy living and learning environment. The College will not tolerate behavior that infringes on the safety of any student.

A student (or group of students) shall not intimidate or bully another student through words or actions.

The College unequivocally opposes any situation created intentionally to jeopardize safety or produce mental or physical discomfort, embarrassment, or ridicule.

Incidents of bullying should be reported to a member of the High School Summer Program staff.

Definitions

“Bullying” means any physical or verbal act or conduct, including communications made in writing or electronically, directed toward a student or students, and meets all of the following criteria.

1. An observed or perceived imbalance of power exists between the person(s) engaging in the bullying behavior(s) and the targeted student(s).
2. The behaviors are severe or pervasive (repeated over time), or there is a high likelihood that behaviors will be repeated. While bullying is often characterized by repeated acts, sometimes a single incident constitutes bullying, depending on the severity and if other elements of bullying are present.
3. The intent of the person(s) engaging in the behavior is to cause physical or emotional harm to the targeted student(s).
4. The behavior has or can be reasonably predicted to have one or more of the following effects:
 - a. placing the student in reasonable fear of harm to the student's person or property;
 - b. causing a substantially detrimental effect on the student's physical or mental health;
 - c. substantially interfering with the student's academic performance; or
 - d. substantially interfering with the student's ability to participate in or benefit from the services, activities, or privileges provided by a school.

Bullying may take various forms, including, without limitation, one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying.

Recording Policy

Summary: Governs the recording of conversations, classes, and interactions, requires consent of all parties in accordance with applicable law, and prohibits recordings made without authorization.

It is expected that faculty, students, and staff will respect the privacy of other individuals in the workplace and educational setting. The College does not condone the recording of any College activities when participants are unaware that such recordings are being made.

Consequently, secret recording (audio or video) or photography of classes, meetings, or other conversations, including telephone calls, is prohibited.

Employees, students, and visitors are prohibited from using the recording components of devices (such as cameras, audio, or video) in restrooms, locker rooms, dressing rooms, and other similar locations where individuals have a reasonable expectation of privacy.

To promote an environment of trust and collegiality, recordings may be made only with the prior consent of all parties involved. No employee or student may use a device to observe or record the activities of another that occur in any private place, meeting, telephone conversation, organized event, or out of public view, unless the person making the recording obtains the consent of all the persons observed.

This policy is not intended to limit the permitted use of recordings under other College policies (such as classroom recordings and specific conduct hearings) or accommodations permitted under the ADA/504 regulations.

Dress Code

Summary: Establishes basic expectations for appropriate attire in academic, dining, and common spaces, with the goal of maintaining a respectful community environment rather than prescribing specific clothing.

The dress code for the program is casual. At no time is clothing that advocates inappropriate behavior acceptable, including offensive slogans or images. Clothing is not to be a distraction to academics or community life. Keep in mind that you are in an academic environment.

Interpretation of this policy is at the discretion of the faculty and staff.

Academic Program Policies

Attendance

Summary: Requires students to attend all scheduled classes and academic activities, establishes the process for reporting absences, and describes consequences for unexcused absences during the program.

Students are expected to attend all their assigned classes, activities, wing meetings, and scheduled events (including field trips) on time unless they have a documented excuse issued by a member of the High School Summer Program staff. Undocumented absences, including chronic tardiness, may result in administrative action.

In addition, students are expected to remain on campus at all times, unless attending a college-sponsored event or activity or with parental permission. While on campus, students are expected to remain in assigned or designated areas on campus. Failure to comply with this requirement will result in disciplinary action.

Classroom Behavior

Summary: Establishes expectations for respectful, engaged participation in class, explicitly acknowledges neurodivergent behavioral variation as normal, and outlines how disruptions will be addressed.

Landmark College is committed to fostering a respectful, inclusive, and supportive learning environment for all student profiles. Creating a comfortable and safe learning environment is important to the development of academic engagement.

In the classroom, students are expected to always maintain appropriate and respectful behavior. This includes following the direction of the instructor, respecting other students, and using appropriate language and action. Inappropriate classroom behavior will be addressed by faculty

and other program staff. Repeated or significant inappropriate behavior may be met with sanctions up to suspension from the program.

We recognize that neurodiversity encompasses a range of behaviors, and that some students may occasionally exhibit behaviors that are perceived as slightly disruptive. These behaviors are often unintentional and should be understood within the context of each student's learning profile.

All students are expected to approach such situations with compassion, patience, and respect. Open discussion or confrontation of a peer's behavior during class or in public settings is not appropriate. If a student has concerns about the behavior of a classmate, they should bring those concerns to the attention of the course instructor or a member of the residential life staff, who will address the matter privately and appropriately.

By embracing empathy and discretion, we maintain a campus community that embodies the core values of Respect, Understanding, Safety, and Honesty dignity and potential of every student.

Academic Integrity

Summary: Defines cheating, plagiarism, fabrication, and unauthorized AI use, requires students to submit their own original work, and establishes the consequences for academic dishonesty during the program.

Academic integrity is the foundation of meaningful learning. When students represent work as their own, that is not; it undermines their own growth and the fairness of the community. Landmark College expects all High School Summer Program students to engage honestly in every academic activity — not because rules require it, but because their own development depends on it.

What Academic Integrity Requires

Students are expected to:

- Submit work that represents their own thinking, effort, and understanding.
- Give credit to any source, person, or tool that contributes to their work, as directed by their instructor.
- Complete all assessments, quizzes, tests, projects, and assignments independently unless the instructor explicitly states that collaboration is permitted.
- Ask their instructor if they are uncertain whether a particular form of assistance or collaboration is permitted.

What Constitutes Academic Dishonesty

The following are examples of academic dishonesty in this program:

- Cheating: Using or attempting to use unauthorized materials, information, or assistance during an academic assessment.
- Plagiarism: Representing another person's words, ideas, or creative work as your own, including copying from the internet, a book, or a peer without attribution.
- Fabrication: Inventing or falsifying data, sources, citations, or other information in academic work.
- Facilitating dishonesty: Helping another student cheat, sharing your completed work with a peer for them to copy, or allowing another student to present your work as their own.

Artificial Intelligence (AI) Tools

Artificial Intelligence (AI) Driven Technologies (Position Statement) Landmark College embraces meaningful and appropriate uses of technology, especially given the potential for better accessibility to curriculum and learning. AI-driven tools such as ChatGPT and DALL-E 2 present powerful opportunities for idea generation and digital literacy.

However, these tools should always be used in ways that uphold academic integrity, honesty, originality, and intellectual rigor. Individual faculty, staff, or departments may provide specific guidelines and expectations for the appropriate use of AI technology.

We anticipate that guidelines and expectations will evolve as AI becomes increasingly incorporated into common use. Collectively, we endeavor to harness the potential and evolving use of technology while upholding the mission and core values of Landmark College.

Asking for Help Is Never Academic Dishonesty

Asking an instructor, a staff member, or a peer for help understanding material is not academic dishonesty. It is good learning practice. Students are strongly encouraged to seek help when they are struggling with content. The difference between acceptable help and academic dishonesty lies in who does the thinking and the work: acceptable help supports your thinking; academic dishonesty substitutes someone else's thinking for yours.

Other Policies That Apply to Time in Class

Summary: Covers additional expectations during academic time, including mobile phone use, recording of class sessions, and conduct expectations specific to the instructional environment.

1. [Student Rights & Responsibilities](#)
2. [Mobile Phone Use](#)
3. [Compliance with College & Program Officials](#)

Residential Life Policies

Living In the Residence Halls

Summary: Introduces the residential experience as a central part of the program and describes the general expectations, values, and shared responsibilities that apply to all students living on campus.

Living on campus is one of the defining experiences of the High School Summer Program and, for many students, one of the most challenging. Sharing space with people you have just met, managing your own schedule away from home, and navigating community expectations in a residential environment requires flexibility, communication, and responsibility.

For students with sensory sensitivities, executive functioning challenges, strong preferences for routine, or limited experience living away from home, the transition can feel especially significant. The residence halls are designed to provide a structured, supportive environment where students can develop independence while remaining connected to staff and peers who are available to help.

Residential Life Staff (Resident Directors, Resident Assistants, Program Assistants, and Night Proctors) are available whenever students are not in class. Students are encouraged to seek assistance early when concerns arise. Most roommate concerns, social challenges, and adjustment difficulties are easiest to resolve when addressed promptly.

Students are expected to contribute to a safe, respectful, and supportive residential community.

Students are responsible for:

- Treating roommates and neighbors with respect.
- Maintaining reasonable cleanliness and organization within their room.
- Respecting the personal property and personal space of others.
- Following all residence hall policies and staff directions.
- Using common areas responsibly and cleaning up after themselves.
- Reporting safety concerns promptly.
- Students are expected to apply these same standards to lounges, hallways, bathrooms, laundry facilities, and the grounds surrounding the residence hall.

Room Use & Occupancy

Summary: Establishes who may occupy residential rooms, how rooms may be used, and what conduct or uses of residential space are prohibited during the program.

Each student is provided with a bed, mattress, chest of drawers, wardrobe or closet, desk, and desk chair.

Students are responsible for keeping their rooms neat, organized & clean. Consideration for roommates and respect for each other's property & personal space is expected. No room alterations are allowed.

Students, as members of a community, are expected to apply these same standards to common living spaces such as bathrooms, hallways, lounges, and grounds surrounding the residence hall.

Room Changes

Summary: Describes the process for requesting a room change, explains that requests are accommodated when possible based on availability, and identifies who to contact to initiate the process.

Every effort is made to house students in compatible situations conducive to academic and personal growth. Roommate changes are rare and may be made only under the direction of the Director of Residential Life or their designee.

Damage Assessment

Summary: States that students are financially responsible for damage to their room or College property beyond normal wear and tear, and describes the assessment process at the end of the program.

Residential staff, with the student present, record room conditions when the student arrives on campus. At closure, this joint procedure is repeated; the room key is returned, and notations are made of any damages caused by the student that may result in charges.

Students are responsible for any damage done to personal or College property. Occupants of a room will be charged for the cost of repairing or replacing damaged or missing Landmark College property.

Damages which cannot be attributed to specific individuals will be charged to all room or building occupants. Landmark reserves the right to determine the cost to repair or replace any damaged property.

Quiet Hours and Courtesy Hours

Summary: Specifies Quiet Hours Sunday through Thursday from 10:00 PM and Friday through Saturday from 11:00 PM, and establishes Courtesy Hours expectations for respectful noise levels at all other times.

The rigorous academic program requires evening study. For this reason, quiet hours must be observed in the residence hall as posted. All students must show courtesy to their roommates and the community around noise, even outside of posted quiet hours.

Courtesy Hours at All Times

Courtesy Hours are in effect 24 hours a day, 7 days a week. At all times, students are expected to be mindful of the noise level in shared spaces (hallways, lounges, bathrooms, and common areas) and to take consideration for roommates, neighbors, and peers who may be studying, resting, or sleeping at any hour.

Quiet Hours

Quiet Hours are in effect from 10:30 p.m. to 7:00 a.m., 7 days a week. During Quiet Hours, the following standards apply in all residence hall spaces, including rooms, hallways, bathrooms, and common areas:

1. Voices should be at a conversational level or lower. No yelling, loud music, or disruptive noise.

2. Music, television, and other audio should be used with headphones or at a very low volume that cannot be heard outside a closed door.
3. Movement through hallways should be quiet and brief.

Curfew

Summary: Requires students to be in the residence hall by 10:00 PM, on their residential wing by 10:30 PM, and in their own room by 11:00 PM, seven days a week for the duration of the program.

Students of the High School Summer Program are required to be in their Residence Hall by no later than 10:30 PM each night, in the wing of their Residence Hall by 10:45 PM and in their own room by 11:00 PM. Failure to abide by the curfew will result in sanctions outlined in the section, “General Sanctions.”

Residence Hall Safety & Security

Summary: Describes the security measures in place in the residence halls, student responsibilities for building security, and procedures for reporting safety concerns or unauthorized individuals.

Safety is a shared responsibility. Students are expected to help maintain a secure residential environment by following all security procedures.

Identification Cards

Summary: Requires students to carry their Landmark College ID at all times, explains how IDs are used for building access and program services, and describes the replacement process if an ID is lost.

Students will be issued a High School Summer Program at Landmark College identification card and yellow lanyard during the registration process. Student ID cards provide meal-plan access and entry to the Residence Halls, where all exterior doors are locked 24/7. Students must always carry this card with them, including the yellow lanyard, and must show it to College and Program officials upon request. Students found tampering with or altering identification cards will be subject to disciplinary action.

Room Keys

Summary: States that students are responsible for their room key, prohibits duplication or transfer of keys, and describes the fees and procedures associated with lost or damaged keys.

At the start of the program, students will be given keys to their rooms that they must return at the end of the program. Because of security concerns, any time a key is lost the student must immediately notify the Residential staff and a lock change will be initiated. A fee of \$50 may be charged for this service.

Locking Doors and Windows

Summary: Requires students to lock their room door and close windows when leaving their room and overnight, as a basic safety measure for themselves and their neighbors.

In the interest of safety and security, all the external doors of the residence hall will be locked at all times. Entry is granted by a valid student ID card.

Students are reminded not to share their ID cards with other students on campus. Additionally, all students should lock their doors and windows when they are leaving their rooms and carry their key

with them. Keys should not be loaned to other students. Lost keys should be reported to the residential staff immediately.

Security and fire doors in the halls should not be propped open (except with magnetic door holders connected to the fire alarm system).

Windows should not be used as an entry or exit from a building unless it is an emergency such as a fire. Items should not be passed through an open window.

Room Inspections

Summary: Explains when and how staff may conduct routine room inspections to ensure health, safety, and compliance with residential policies, with notice provided when practicable.

Weekly health & safety inspections of each room will be conducted by members of the residential staff to ensure compliance with established standards.

Any concerns will be addressed with the students in a developmental manner, and students are expected to immediately comply with staff members' requests.

Room, Automobile, and Personal Effects Searches

Summary: Describes the circumstances under which the College may conduct a search of a student's room, belongings, or vehicle, including situations involving health, safety, or suspected policy violations.

Landmark College reserves the right to enter, inspect, and search student rooms, automobiles, or personal property when necessary to protect health, safety, security, or to investigate possible violations of College or program policies.

Personal Property Liability

Summary: States that the College is not responsible for the loss, theft, or damage of students' personal property, and encourages students to leave valuables at home or secure them appropriately.

Students are advised to take precautions in securing items of value in their room, on their person, and throughout campus. This applies to students' own possessions and those possessions left in their charge (i.e., college equipment on loan).

The College and its employees do not assume responsibility or liability for damages, theft, or loss of personal property, or the failure/interruption of services due to weather or other acts of God. Students and families are advised to carry the proper insurance.

Fire Safety

Summary: Prohibits items that pose a fire risk in residential spaces, including candles, hot plates, and certain appliances, and establishes students' responsibility to follow all fire safety protocols.

Compliance with fire regulations is a necessity in the residence halls. Smoke and heat detectors are only a part of fire safety. While the residence halls are as fireproof as it is possible to make them, each room may contain combustible personal items, which make the following rules necessary:

1. Electrical appliances including, but not limited to halogen lamps, hot plates, toasters, immersion coils, “George Foreman” type grills, toaster ovens, electric blankets, space heaters, sun lamps, and power tools are not permitted.
2. Candles, camp stoves, lanterns, hurricane lamps, incense, or any other items with open flames are not permitted.
3. Igniting any combustible material in the residence halls (wood, paper, liquids, fabric) or playing with matches or lighters is prohibited and may be met with immediate suspension or expulsion from the program.
4. Fireworks, explosives, volatile liquids, and fuel are not permitted.
5. Posters, pictures, and other combustible wall decorations which are not placed flat against the wall or block, or hinder entryways are not permitted.
6. Ceilings may not be decorated with fabric, posters, fishnet, or other combustible material that might ignite.
7. Wooden constructions (lofts, overstuffed chairs, etc.) unless they are approved by the Resident Dean, Safety & Security, or the Facilities personnel, are not permitted.
8. Room contents must not obstruct doors, passageways, or corridors. Tapestries may not be hung from the ceiling or across closet openings.
9. Fire alarms and extinguishers are critical for safety and must not be tampered with. Students who pull false alarms and/or tamper with fire safety equipment will be subject to fines and disciplinary action up to and including suspension or expulsion, fines from the Putney Fire Department, and may also be subject to criminal charges.
10. Extension cords under carpets or that multiply the number of electrical appliances used in one outlet without a surge protector are prohibited.

Fire Drills and Building Evacuation

Summary: Requires all students to evacuate immediately when a fire alarm sounds, describes assembly locations and procedures, and establishes that failure to evacuate is a serious conduct violation.

Landmark College regularly conducts fire drills and building evacuations as part of its policy regarding health and safety. All occupants of a building whose alarm has been triggered must evacuate the building immediately in an orderly fashion and meet at the designated “safe area.” Such procedures, including directions to the “safe area,” will be reviewed and practiced during orientation. Students must remain in the designated “safe area” until the situation has been cleared by local safety authorities.

Guests

Summary: Limits guests in residential rooms to other HSSP students with roommate consent, prohibits college-program students from residential floors, and describes staff oversight of all guest interactions.

Only the student and their assigned roommate are allowed in their room, no guests. Students are encouraged to socialize in the common areas/lounges of their residence hall. Guests are defined as registered students, faculty, or staff in the High School Summer Program at Landmark College.

All others are not permitted in the residence hall, including students enrolled in the College summer programs, unless specifically invited by residential staff. No overnight guests are permitted.

Visitor Policy

Summary: Defines authorized visitors as parents or pre-approved individuals, requires all visitors to check in with Campus Safety, establishes visiting hours, and prohibits unauthorized individuals from campus access.

The safety and well-being of all High School Summer Program students depend on careful management of who may access the campus and interact with program participants during the program period. The following policy governs all visitors to High School Summer Program students.

While families are welcome to visit during the program, the program works best when students are fully present. Visits, even well-intentioned ones, can interrupt the rhythm of independence that makes this experience meaningful. Three weeks is a short window, and the growth that happens here tends to happen fastest when students are working through the hard parts rather than stepping away from them.

Authorized Visitors

The following individuals are considered authorized visitors and may visit a High School Summer Program during the program:

1. The student's parent(s) or legal guardian(s) of record, as identified in the student's enrollment documentation.
2. Individuals specifically authorized in advance and in writing by a parent or legal guardian. Authorization must be submitted to the College no later than 48 hours before the planned visit.

Visitor Check-In Procedure

All authorized visitors, including parents and legal guardians, must:

1. Check in with Campus Safety at the Campus Safety Office in Davis Hall, an available Resident Director, or other High School Program administrator upon arrival, and present a valid government-issued photo ID.
2. Be accompanied by a High School Summer Program staff member at all times in residential areas of campus. Visitors are not allowed to enter the residence halls without a staff escort, even with their own student.

Restrictions on Visitor Access

Visitors may not:

1. Enter any residence hall floor without a High School Summer Program staff escort.
2. Enter a student's residential room if the roommate is present.
3. Interact with other High School Summer Program students without those students' consent and staff awareness.

4. Access college-program residential areas, academic buildings, or restricted campus spaces.
5. Remove a student from campus without completing a Permission to Leave Campus form. See the Permission to Leave Campus policy in this handbook.

Unauthorized Visitors

Individuals who have not been pre-authorized through the process described above are not permitted to visit students on campus. If an unauthorized individual arrives on campus requesting access to a student, the staff will:

1. Decline access to the student.
2. Contact Campus Safety immediately.
3. Notify the program administration.
4. Contact the student's parent or legal guardian of record to verify the situation.

Students who are approached on campus by an individual they do not know, or who makes them uncomfortable, should report the contact to a staff member or Campus Safety immediately.

Student Pick-Up at Program Conclusion

Pick-up of students at the conclusion of the program is governed by the Permission to Leave Campus form. If anyone other than the parent or legal guardian of record will be picking up a student at program's end, a completed form must be on file with the college before the final day of the program.

Dining Services

Summary: Describes meal service arrangements for HSSP students, including designated dining periods, expectations for conduct in the dining hall, and how dietary needs or restrictions are accommodated.

Landmark College's dining hall serves breakfast, lunch, and dinner Monday-Friday, and continental breakfast, brunch, and dinner on Saturdays and Sundays.

Meals are included in the program fee, and students are expected to attend meals during designated dining periods. The dining hall is a shared campus space (see the [Guidelines for Campus Access](#) section for expectations around shared spaces and dining hall conduct).

What to Expect at Meals

The dining hall offers a range of options at every meal, including hot entrées, a salad bar, a deli station, vegetarian and vegan selections, and daily alternatives for students who may not find the main offerings appealing. Landmark's dining program is built with a neurodiverse student population in mind. The staff understands that food sensitivities, texture aversions, limited food repertoires, and strong preferences around smell, temperature, and presentation are real and common, not “picky” or difficult. Students who have concerns about finding something they can eat are encouraged to speak with dining staff directly and early.

Food Coaching

Landmark College offers [Food Coaching services](#) to support students with specific dietary needs, food-related anxiety, sensory sensitivities, or limited food repertoires. Food Coaching is a

collaborative, non-judgmental process that helps students navigate the dining hall, identify foods that work for them, and gradually expand their comfort and confidence around eating in a community setting without pressure or shame. HSSP students who would benefit from Food Coaching support should speak with the [Chartwell's Dining staff](#) at or before registration so that appropriate arrangements can be made for the program period.

Dietary Restrictions and Allergies

Students with documented food allergies, religious dietary requirements, or medical dietary needs should indicate these on their health forms prior to arrival. Dining services staff will work with Health Services and program administration to accommodate verified dietary needs. Students with severe food allergies — particularly those requiring an EpiPen — should ensure that their emergency medication protocol is clearly documented on their health forms and understood by Health Services staff. See the Prescription Medications section of this handbook for details. Students are also welcome to speak directly with dining hall staff at any meal about ingredients, preparation methods, and available alternatives.

The Dine on Campus Website and App

Landmark's dining services uses the [Dine on Campus](#) app (or website), which allows students and families planning ahead to browse daily menus, filter by dietary restriction, view allergen information, and check nutritional content before arriving at the dining hall.

For students who benefit from knowing what is available before they get there, whether because of food anxiety, sensory sensitivities, or simply a preference for planning, this tool is genuinely useful. The app is available for free download on iOS and Android. Families are encouraged to help students download and explore the app before the program begins so they arrive already familiar with how it works.

The Fireside Café

The Fireside Café is a campus cafe and casual gathering space that offers beverages, snacks, and light fare in a relaxed setting. For many students, the Fireside Café becomes a favorite spot in the evenings. HSSP students may use the Fireside Café during designated free time within program hours. Hours of operation will be posted at the café and included in the weekly program schedule.

Students should be aware that the Fireside Café is a shared campus space used by college-program students and staff as well as HSSP participants, and the shared-space conduct expectations described in this handbook apply.

Food Delivery and Outside Deliveries

Summary: Prohibits food delivery services such as DoorDash to campus, permits deliveries for genuine necessities only with staff approval, and requires all packages to be received through Campus Safety.

Third-party food delivery services, including DoorDash, Uber Eats, Grubhub, and similar platforms, are not permitted to deliver directly to the residence halls or anywhere on campus.

Meals are provided through the program's dining services, and individual food delivery orders are not approved as a supplement to that arrangement. Delivery services may be used only in cases of

genuine necessity, such as a forgotten medication, a required supply, or an essential personal item, and only with advance approval from program staff.

All approved non-mail/package deliveries must be directed to Campus Safety rather than to the residence hall. Students will be notified when a package is available and are responsible for picking it up during designated hours.

For non-urgent needs, families are strongly encouraged to ship items through Amazon or standard package delivery services in advance of or during the program rather than arranging same-day delivery.

If a family believes a situation requires a staff-assisted pickup from a nearby store such as Target or a local pharmacy, they should contact the Program Director to discuss whether that can be arranged. It is not guaranteed, but the program will make reasonable efforts to assist in genuine need situations.

Mail & Packages

Summary: Explains how students receive mail and packages during the program, describes pickup procedures through the campus mailroom, and states that students are responsible for retrieving their own items.

Students and Families may pick up mail and packages that were shipped in advance on arrival day in the Mailroom, located in the Administration building. After arrival day, students will be able to pick up mail and/or packages from the Mailroom during the lunch period between classes during the weekdays. No mail service is available on the weekends.

Student Mailing Address

Student mail and packages should be addressed to:

Student Name

Landmark College High School Summer Program

19 River Road South

Putney, VT 05346

Campus Policies & Operations

Guidelines For Campus Access and Shared Spaces

Summary: Defines approved campus areas for HSSP students, establishes expectations for behavior in spaces shared with college-program students, and describes what to do if a student feels unsafe on campus.

Landmark College operates multiple programs simultaneously during the summer, including the High School Summer Program and college-level academic programs. Because these populations share certain campus spaces, clear guidelines are essential to ensure the safety and well-being of all students, particularly High School Summer Program participants who are minors.

Residential Boundaries

1. High School Summer Program students are restricted from entering any residence hall that houses college-program students.
2. College-program students are restricted from entering the residential floors of the High School Summer Program.
3. No student may enter another student's residential room. Students may socialize in residence hall lounges and hallways within their own program's designated areas.
4. During free time, students in the High School Summer Program will be restricted from areas of campus where supervision may be challenging to achieve. This includes the woods or trails on campus.

Interactions with College-Program Students

High School Summer Program students and college-program students will inevitably encounter one another in shared spaces (the dining hall, library, Student Center, Sports Center). The following expectations apply:

1. Due to the nature of the ages in each program, any fraternization that is excessive, disrespectful or otherwise inappropriate between High School and College program students will be addressed by the College.
2. Brief, incidental interaction — a greeting, a shared space — is normal and expected.
3. Extended private socializing between High School Summer Program students and college-age students is not permitted. This includes extended one-on-one conversations, making plans to meet privately, sharing contact information, or forming social relationships that extend beyond incidental contact.
4. High School Summer Program students should not share their room number, residential floor, schedule, or other personal information with college-program students.

Any interaction by any person that feels uncomfortable, inappropriate, or unwelcome should be reported to a High School Summer Program staff member immediately.

Permission To Leave Campus

Summary: Requires written parent or guardian authorization for any student to leave campus, describes the sign-out procedure, and establishes that students may not leave campus independently without approval.

Students in the High School Summer Program at Landmark College are required to always remain on campus unless they are on a supervised, program-related activity.

If a student must temporarily leave campus at any point for a non-program-related reason, they may only leave accompanied by a parent, legal guardian, or individual identified by a parent or legal guardian, and a “[Permission to Leave Campus](#)” form must be completed. This form should also be completed if someone other than a parent or legal guardian will be picking up a student at the end of the program. This form is not necessary if a student will be leaving campus on a Landmark shuttle at the end of the program.

Neither Landmark College nor any of its agents is liable for a student when the student is on an off-campus trip that has been approved by the student’s parents or guardians.

Note: The College has designated a 1-mile loop on/off campus for High School Program students who use running/jogging as a part of their wellness plan. This loop consists of the entirety of Perseverance Drive and Charles Drake Lane, and a portion of River Road South between the first and third entrances to the College. Students may use this loop during their free time on campus or before morning classes. **Checking in with a Residential Staff member before and after running is required.**

Computer and Network Acceptable Use Policy

Summary: Governs students' use of College technology resources and networks, prohibits misuse, illegal activity, and harassment through College systems, and states consequences for policy violations.

Computing resources at Landmark College and in the High School Summer Program are provided to support academic and administrative functions. Any device that connects to the College's network is subject to this policy.

Open access is a privilege, requiring responsible use. While using computing resources, users must respect others, system integrity, and legal obligations, including software licensing and copyright laws. Network accounts are Landmark College property, and users should not expect privacy. The College may inspect files or emails if there is suspected misuse or legal violation.

Email Use

Email accounts are provided for College-related communication. Misuse can result in access restriction or disciplinary action. Users must comply with laws and College policies, avoiding inappropriate content and unauthorized access. Confidentiality of email cannot be assured, so users should exercise caution. Offensive or illegal emails should be reported to tech support.

Email Privacy and Confidentiality

College policy and secure passwords provide good but not complete assurance of the privacy of users' email messages. Since the confidentiality of email cannot be assured, and such confidentiality may be compromised by unintended redistribution or forwarding, users should exercise extreme caution in using email to communicate confidential or sensitive matters. They should not assume that their email is private or confidential.

Prohibited Computer, Network, and Email Conduct

To ensure the integrity of the Landmark College computer network, users may not:

- Share login credentials
- Use excessive bandwidth
- Violate copyright laws
- Install unauthorized equipment or software
- Circumvent security measures
- Engage in disruptive activities or misuse resources
- Use College resources for commercial purposes without permission
- Harass or threaten others via email
- Run or download games on public computers
- Forge identities or monitor/tamper with others' communications

Misuse of computing, networking, or information resources may result in the loss of computing and/or network access and may lead to disciplinary action, up to and including termination of employment. Additionally, misuse can be prosecuted under applicable statutes including intellectual property, copyright, harassment, and obscenity laws.

The College reserves the right to limit or restrict access to the Internet or its network-based information technology resources based on job function, institutional priorities, bandwidth constraints, or College policies. The College also reserves the right to examine material stored on or transmitted through its facilities if there is cause to believe that a member of the College community is violating the standards for acceptable and ethical use.

Mobile Phones

Summary: Frames phone use as a life skill, establishes expectations for phone use in academic and residential settings, and describes an escalating staff response for students who cannot manage phone use appropriately.

Mobile phones are an essential part of modern life. They serve as powerful tools for communication, organization, safety, and access to information. At the same time, they can be intrusive and, if overused or inappropriately timed, can interfere with learning, engagement, and the development of meaningful interpersonal relationships.

Learning when and how to use technology appropriately is an important life skill. This policy is designed to strike a healthy balance by supporting students in using their devices as tools while also setting clear expectations for when phones should be put away so that they can fully engage, connect, and grow within the program.

Guiding Principles of Mobile Phone Use

- **Purposeful Use:** Phones should be used *intentionally* as tools for learning, communication, and support.
- **Presence & Engagement:** Being fully present is essential to academic success and community belonging.
- **Respect for Others:** Phone use should not disrupt classes, activities, or interactions.
- **Balance & Well-Being:** Developing healthy habits around technology is part of personal growth.

General Expectations

- Students may use mobile phones during **designated free time** and in **appropriate settings**.
- Phones should be used in ways that are **respectful, non-disruptive, and aligned with community expectations**.
- Students should be aware of shared environments and show courtesy toward roommates and peers regarding phone volume, content, and timing (including late-night use in residence hall rooms).
- The College/program reserves the right to **set boundaries around phone use in specific environments**.

Classroom Expectations

- Mobile phones are not to be out during class.
- Phones must be silenced and put away (e.g., in a bag or pocket) before class begins.
- Phones may only be used in class when explicitly permitted by the instructor for a learning activity.
- Repeated or inappropriate use may be addressed through faculty or staff follow-up.

College Authority

Staff are empowered to set clear expectations for phone use in campus spaces, redirect students when use becomes disruptive, and support students in developing healthy and balanced technology habits.

Staff or faculty may ask students to put phones away if they are causing disruption, interfering with participation, or detracting from the experience of others. Students are expected to comply respectfully and promptly with these requests.

Initial response by staff will focus on reminders and redirection. Ongoing concerns may lead to follow-up conversations about expectations and impact. Patterns of disruption may be addressed through the program's conduct processes and could include phone collection or confiscation.

Video Surveillance Cameras

Summary: Notifies students that campus common areas and building entrances are monitored by video surveillance for safety and security purposes, and that footage may be reviewed in connection with conduct matters.

General Policy

Landmark College is committed to enhancing a safe environment for students, employees, and visitors by integrating the best practices of technology use for campus safety and security. A critical component of a comprehensive campus safety plan is the utilization of video surveillance systems.

Landmark utilizes video surveillance cameras as a campus safety, emergency response, and deterrence tool. Video surveillance and recording for safety and security purposes will be conducted in a manner that respects the reasonable expectation of privacy among members of the community.

Camera Placement and Purpose

Video surveillance cameras will be strategically placed in public areas across campus to deter and investigate unauthorized activities, adverse behaviors, and safety concerns.

Cameras will not be placed in areas where individuals have a reasonable expectation of privacy, such as providing views into restrooms, locker rooms, residential student rooms, and individual offices.

The primary purpose of video surveillance cameras is to record events for later review and investigation. They will not be actively monitored on a full-time basis.

Data Retention

Recorded footage will be retained for up to 90 days, after which it will be automatically deleted unless needed and retained as part of an investigation or disciplinary record.

Access to Footage

Access to stored footage will be restricted to authorized personnel who are appropriately exercising their responsibilities at the College, including Campus Safety personnel or administrators in Student Affairs, Human Resources, or the President's office.

Exclusions

This policy does not apply to video recording or monitoring used for operational purposes, academic purposes (under the College's classroom recording policy, media purposes, or recording of public performances, events, or interviews provided that such activity is disclosed or readily apparent to those in view of the camera. Examples of such excluded activities would include the recording of research subjects, athletic events, concerts, plays, lectures, or interviews of persons.

Automobiles

Summary: States that HSSP students may not bring personal vehicles to campus and establishes that any vehicles present must be registered with Campus Safety and used in accordance with College policy.

Automobiles and their use are not allowed on campus by participants of the High School Summer Program. Students with parental permission to arrive on campus using personal transportation will be asked to surrender all keys to the Residential staff upon arrival and park their automobile in a designated area for the duration of the program. Students may not return to their automobiles without the permission of the residential staff until the program ends.

Compliance With College and Program Officials

Summary: Requires students to comply with reasonable directives from any College employee, Campus Safety officer, or program staff member, and establishes non-compliance itself as a conduct violation.

All students are expected to comply with all requests and directives made by College and Program staff members who are appropriately exercising their responsibilities. This includes, but is not limited to, residential staff, security staff, building managers, facilities staff, faculty, program directors, and deans.

Formal Processes

Grievance Process

Summary: Provides a formal pathway for students or families to raise concerns about unfair treatment or policy misapplication, with escalation options and explicit non-retaliation protections for all who participate.

Any student who feels aggrieved, treated unfairly, or wronged by the action of another student or a program employee at Landmark may use the process outlined below to raise their concern. The College takes all grievances seriously and will work to resolve them in a fair, timely, and supportive manner.

What Is a Grievance?

A grievance is a formal expression of concern that a policy has been applied unfairly, that a student has been treated in a discriminatory or disrespectful manner, or that a staff member has acted

outside the bounds of their authority or the College's policies. Grievances are distinct from reports of student-on-student misconduct, which are addressed through the disciplinary process.

Informal Resolution

Students are encouraged to attempt to resolve concerns informally first, by speaking with the staff member involved, their Resident Director, Assistant Director, or Residential Life, or the Vice President for Student Affairs. Many concerns can be resolved through a direct conversation without the need for formal procedures. Students may bring a trusted adult — including a parent or guardian — to an informal resolution conversation if they wish.

Formal Grievance Procedure

If a concern cannot be resolved informally, or if the nature of the concern makes informal resolution inappropriate (e.g., a concern about the conduct of a program administrator), the student or their parent/guardian may submit a formal grievance as follows:

1. Submit a written description of the concern to the Vice President for Student Affairs. Written grievances may be submitted by email, letter, or through a parent or guardian acting on the student's behalf.
2. The written grievance should describe what happened, when it happened, who was involved, what resolution the student is seeking, and any previous attempts to resolve the concern informally.
3. The Vice President for Student Affairs, or a designee, will acknowledge receipt of the grievance within 2 business days and will work to resolve it within 10 business days, with written notice to the student and parent/guardian of any extensions.
4. If a student's grievance concerns the conduct of the Vice President for Student Affairs, the grievance should be submitted to the Office of the President of the College.

Non-Retaliation

No student will be retaliated against, penalized, or treated adversely for submitting a grievance in good faith, participating in a grievance process, or assisting another student in doing so. Any suspected retaliation should be reported immediately to the Vice President for Student Affairs or the Program Director.

Role of Parents and Guardians

Because High School Summer Program students are minors, parents and legal guardians may participate in the grievance process on behalf of their student, assist their student in submitting a written grievance, and be present at any meeting convened as part of the grievance process. The College will communicate grievance outcomes to both the student and the student's parent or guardian unless the student specifically requests otherwise and the College determines this is appropriate.

Conduct Process & Disciplinary Procedures

Summary: Describes how the College investigates and resolves conduct violations, including the student's right to share their account, the role of the Program Director, and the range of possible outcomes.

It is expected that all members of our community will conduct themselves responsibly in accordance with the policies and regulations outlined in this handbook. The College, through the disciplinary process will address actions that are inconsistent with the ideals of this community, violations of program policy, or are prejudicial to the best interests of the Landmark College or the High School Summer Program.

Landmark College reserves the right to impose disciplinary sanctions, up to and including expulsion, for violations of College policies or for the commission of illegal acts (on or off campus) or for any action it deems to be detrimental to the student's performance, or which would be harmful to the welfare of the College, or which would disrupt the academic process of the program.

The College reserves the right to address all matters through its disciplinary process, without regard to whether the conduct at issue may also be the subject of criminal charges.

Landmark College's disciplinary system relies on the standard of proof of a "preponderance of the evidence". This means that a hearing official or conduct board must believe that there is more than a 50% likelihood that the actions or behavior in question did occur.

The determination of the appropriate discipline, including expulsion from the College, shall be in the discretion of the President of the College, Program Director, Vice President for Student Affairs, or their designees as appropriate. The procedures set forth should not be considered to be a promise for specific treatment in specific situations.

The College may immediately suspend or expel a student who poses a continuing danger to self, persons or property, or who poses an ongoing threat of disruption to the academic progress of the College prior to or subsequent to the disciplinary procedures described in this Handbook.

The President of the College has the ultimate decision-making authority in all matters relating to carrying out the College's policies, including matters relating to discipline and expulsion.

General Sanctions

Summary: Lists the range of consequences available to the College in response to conduct violations, from educational conversations and probation to suspension and dismissal, scaled to the severity of the conduct.

When violations of college policy or Standards of Conduct occur, the College will use the following criteria to determine the appropriate level of sanction.

1. The extent to which the behavior has affected the ability of other members of the community to pursue their own academic and personal goals.
2. The extent to which the behavior has affected the reputation of the College or the ability of the College to effectively pursue its mission.
3. The extent to which the safety or well-being of any individual has been placed in jeopardy.
4. The extent to which standards of civil behavior have been violated.
5. The extent to which the behavior has violated local, state or federal law.

Students who do not follow the structures and requirements of any sanctions issued by the College may be subject to further disciplinary action.

Disciplinary Status

- **Warning** – A reminder to the students of the obligation they accept to adhere to Landmark’s policy, procedure or rule.
- **Probation** - an official notification that any further violations of college policy may result in dismissal from the program.
- **Suspension or Expulsion** - A student is required to leave the program immediately. They may or may not be permitted to return to the campus in the future.

Educational & Alternative Sanctions

At the discretion of a hearing officer, a student may be assigned additional sanctions intended to support the educational dynamic of the intervention process. Possible alternative and educational sanctions are listed, but not limited to, the items below.

- **Community Service:** Under certain circumstances, students may be required to complete a stated number of community service hours, special projects or educational programs.
- **Educational Programming:** Students may be required to attend and report on an educational program addressing a specific issue (i.e., drug & alcohol use, sexual respect, etc.).
- **Change of Residency:** Re-assignment of an individual to a different room or residence hall.
- **Residential Restrictions:** The restriction for a student to enter a particular residential room, floor, or building.
- **Loss of Privilege:** The revocation of specific privileges existing on campus.
- **Restitution:** Cost of repairs, replacements, and reimbursements to the College or community members.
- **Fines:** Assessments to students as a result of disciplinary action. The amount of a fine is at the discretion of the College.

Community Standards Conferences

Summary: Describes the meeting-based process through which conduct matters are typically resolved, including who participates, how the student's account is heard, and how outcomes are communicated.

The High School Summer Program uses a progressive, educational approach to address behavioral concerns. Most conduct issues are resolved through conversation, coaching, and accountability rather than formal disciplinary action. Depending on the nature and severity of the concern, students may be required to participate in either a Community Standards Conference or an Administrative Hearing.

Level I: Community Standards Conference

Students involved in minor or first-time violations of program policies may be required to participate in a Community Standards Conference. These meetings are typically conducted by Residential Life staff members and are intended to help students understand the impact of their behavior, review community expectations, and develop strategies for future success.

Examples of concerns that may be addressed through a Community Standards Conference include:

- Failure to comply with curfew requirements.
- Excessive noise or disruption in residential areas.
- Failure to attend required classes, meetings, activities, or other scheduled program obligations without prior approval.
- Failure to follow residence hall policies or community expectations.
- Minor misuse of shared community spaces.
- Minor roommate or peer conflicts.
- Failure to comply with staff directions that do not create a safety concern.
- Minor acts of dishonesty.
- Minor academic integrity violations.
- Other low-level violations of program policies.

Outcomes of a Community Standards Conference may include:

- Educational conversations
- Written reflection assignments
- Restitution or community-based sanctions
- Behavioral agreements
- Restrictions on participation in activities
- Loss of privileges
- Verbal or written warnings

Students who receive a written warning are considered to be on notice that future violations may result in referral to an Administrative Hearing.

Parents or guardians may be notified of Community Standards Conferences at the discretion of program administration.

Level II: Administrative Hearing

Students alleged to have committed serious violations of program policies, repeated violations following a warning, or conduct that jeopardizes the safety, wellbeing, or functioning of the community may be required to participate in an Administrative Hearing.

Administrative Hearings are typically conducted by members of the High School Summer Program administration and provide students with an opportunity to review the allegations, share relevant information, and participate in the resolution process.

Examples of concerns that may result in an Administrative Hearing include:

- Repeated policy violations following a warning
- Leaving campus without authorization.
- Being present in unauthorized locations on campus.
- Riding in or operating unauthorized vehicles.
- Theft, attempted theft, or possession of stolen property.
- Deliberate destruction of property, vandalism, or significant misuse of College facilities.

- Repeated or serious academic dishonesty, including cheating, plagiarism, or misrepresentation.
- Engaging in conduct that violates local, state, or federal law.
- Sexual misconduct, sexual harassment, stalking, dating violence, domestic violence, or other prohibited sexual behavior.
- Engaging in inappropriate sexual behavior that creates discomfort, disruption, or risk to others.
- Fighting, physical aggression, assault, or violence of any kind, including mutual combat.
- Threatening behavior or conduct that creates a reasonable fear of harm.
- Verbal, written, electronic, or physical harassment of students, faculty, staff, or visitors.
- Bullying, hazing, intimidation, retaliation, or discriminatory conduct.
- Repeated failure to comply with staff directions.
- Repeated violations of curfew or other program expectations following a Formal Warning.
- Any behavior that places the student, another individual, or the community at risk of harm.

Parent/Guardian Participation in Administrative Hearings

Because High School Summer Program participants are minors, parents and/or legal guardians will generally be notified and may attend Administrative Hearings. The hearing is intended to focus on the student's conduct and development; therefore, parents and guardians may provide support but may not actively participate unless invited by the hearing administrator.

Attorneys are not permitted to participate in Administrative Hearings unless the student is simultaneously facing related criminal charges arising from the same incident. In such cases, the College reserves the right to determine the appropriate role of legal counsel in the process.

Following an Administrative Hearing, the College may determine that a policy violation occurred and impose sanctions as appropriate. Sanctions may include, but are not limited to:

- Formal Warning
- Probationary Status
- Restrictions on participation in activities
- Loss of privileges
- Restitution
- Behavioral contracts
- Removal from specific program components
- Suspension from the program
- Expulsion from the program

Interim Actions

Summary: Explains that the College may take immediate protective action — including temporary removal from program activities — before a formal conduct process is complete, when safety requires it.

Certain behaviors involving violence, weapons, sexual misconduct, unauthorized departure from campus, significant threats to safety, or possession/distribution of alcohol or drugs may result in immediate interim restrictions, parental notification, or removal from the program pending review.

Culpability

Summary: Addresses how the College considers a student's level of responsibility in a conduct matter, including circumstances such as voluntary intoxication, mental health status, and coercion by others.

As it is often difficult to accurately determine degrees of culpability, all residents of a room where a violation is found may be held responsible to some level for that violation. Students are advised, therefore, to avoid such situations that may put them at risk of unwanted interventions and are encouraged to inform College staff if such violations are occurring in their room.

Appendix A – Accommodations Policy and Procedures

Accommodations Policy Statement

Summary: States the College's legal obligation and institutional commitment to providing equal access to qualified students with disabilities through reasonable accommodations, auxiliary aids, and services.

Landmark College fully supports and recognizes the standards set forth in Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990, and similar state laws ("applicable law"), which are designed to eliminate discrimination against qualified individuals with disabilities.

Disabilities may include physical or mental impairments which substantially limit one or more of a person's major life activities, and which necessitate modifications to Landmark College's facilities, programs, or services.

The College is committed to making reasonable accommodations for qualifying students, faculty, and employees with disabilities as required by applicable laws. The College is committed to making the campus and its facilities accessible as required by applicable law. The College cannot make accommodations that are unreasonable, unduly burdensome or that fundamentally alter the nature of the College's programs or services.

The College will engage in the interactive process promptly and seek to implement approved accommodations in a timely manner.

Admission For Students With Disabilities

Summary: Clarifies that disability status is not a factor in admission decisions and that accommodation needs are addressed separately through the College's accommodation process after enrollment.

Landmark College is committed to providing equal access to students with disabilities and welcomes applications from students with disabilities.

As part of Landmark College's mission to serve students who learn differently, applicants are asked to provide documentation or information demonstrating a history of learning disabilities, ADHD, or autism, to assist the College in evaluating fit with its educational model and support services.

An applicant's self-identification of disabilities beyond those required for admission is at the option of the applicant and is not required.

Confidentiality of Disability-Related Information

Summary: Explains how the College protects students' disability-related information, who may access it and under what circumstances, and students' rights regarding disclosure of their diagnoses or documentation.

The College is committed to maintaining the privacy and confidentiality of disability-related information submitted through this process in accordance with the ADA, Section 504, FERPA, and other applicable laws.

Disability documentation and accommodation records will be maintained separately from general educational records when appropriate and shared only with College personnel who have a legitimate educational or operational need to know in order to evaluate, implement, or monitor accommodations and accessibility requirements.

Faculty and staff involved in the accommodation process are expected to maintain the confidentiality of disability-related information and may not disclose such information except as permitted by law or College policy.

Students with questions or concerns regarding confidentiality should contact the 504/ADA Coordinator.

Accessibility of Campus Events and Programs

Summary: States that all College-sponsored events and programs must be accessible to students with disabilities and describes how students may request accessibility support for specific activities.

Landmark College will make its campus programs and events reasonably accessible to individuals with disabilities. Any individual, including visitors to campus, who requires an accommodation should contact the program planner or the events scheduling office at least ten days in advance of the event. Students may also contact the Vice President for Student Affairs. While advance notice is strongly encouraged and may improve the College's ability to arrange accommodations, the College will review all requests on an individualized basis.

Section 504 Coordinator

Summary: Identifies the College's Section 504 Coordinator, explains their role in overseeing compliance and handling accommodation-related concerns, and provides contact information for students and families.

Landmark College designates the Vice President for Student Affairs to coordinate its efforts to comply with and carry out its responsibilities under Section 504 of the Rehabilitation Act of 1973. Section 504, where applicable, generally prohibits discrimination in educational programs and employment against qualified individuals with disabilities on the basis of disability. Also see Landmark's **Error! Reference source not found.**

ADA Coordinators

Summary: Identifies the College's ADA Coordinators for students, employees, and facilities, explains their respective responsibilities, and provides contact information for raising accessibility concerns.

Landmark College has established a process to facilitate the reasonable accommodation of students with disabilities. Landmark's ADA Coordinators certify eligibility for accommodation under the ADA for students presenting documented evidence of qualifying disabilities (including qualifying physical disabilities, learning disabilities, attention deficit disorders, psychological disabilities, medical disabilities, and covered students in drug or alcohol recovery), and, using an interactive process that includes other appropriate members of the Landmark College

administration to serve as an accommodations team, reviews and acts upon all student requests for reasonable accommodations based on an individualized assessment of each request.

The ADA Coordinator(s) reserves the right to recommend and approve accommodations that differ from the specific approaches suggested by the student, or by individuals documenting the student's disability, so long as the accommodations achieve the objective of program accessibility as required by law.

The ADA Coordinator(s), in coordination with appropriate campus personnel, coordinates and facilitates the implementation of accommodations that have been deemed reasonable and appropriate in light of the nature of a student's disability and in consideration of the individual's academic requirements.

For Students

The Vice President for Student Affairs also serves as the primary ADA Coordinator for students. The Director of Academic Support and Placement serves as the designated ADA coordinator for students regarding academic and academic support accommodations.

For Employees

Faculty, staff, and other Landmark employees who have ADA-related concerns are assisted by the Director of Human Resources. For more information about the process for employees seeking accommodations, please see the [Employee Handbook on the Human Resources Sharknet page](#).

Other individuals may be designated by the 504/ADA Coordinator, and references throughout this policy to the 504/ADA Coordinator should be read to include designees of the 504/ADA Coordinator.

Student Accommodation Procedures

Summary: Describes the step-by-step process for requesting accommodations, including how to submit documentation, meet with the accommodation office, and receive a formal accommodation determination.

All requests for accommodation, inquiries about the scope of this policy, and related procedural questions should be directed to the 504/ADA Coordinator. The 504/ADA Coordinator administers this policy and procedure and is the College's designated Section 504 Coordinator. The ADA Coordinator will address accommodation requests through the following two-stage process.

Certification

The first step in the process requires that students provide information from which the College can determine whether the student is a person with a disability within the scope of this policy. Such certification is a prerequisite to the reasonable accommodation dialogue described in this policy.

Students seeking certification must fill out an [Accommodation Request Form](#) and provide the information and documentation requested on the form. The form requests, among other things:

- i. a description of the impairment, and a description of the manner in which it substantially limits one or more major life activities;
- ii. a description of the specific accommodations requested; and

- iii. documentation consisting of reports and clinical information from a qualified healthcare provider or other qualified professional qualified to diagnose the impairment at issue, verifying the nature and extent of the impairment, and the manner in which the impairment limits a major life activity (see Documentation, below).

The [Accommodation Request Form](#) and documentation should be submitted as far in advance of the period for which the accommodations are requested as possible. The College may not be able to arrange for accommodations that are not requested in a timely manner. At its discretion, the College may allow for temporary accommodations while awaiting documentation or the execution of the full accommodations policy requirements.

The 504/ADA Coordinator reviews the [Accommodation Request Form](#) and the accompanying documentation, and pursues one of the following courses of action:

- i. certifies the student's eligibility for accommodation under this policy; or
- ii. finds that there is insufficient information to certify the student's eligibility, and through a written or e-mail communication, either
 - a) denies the student's request for certification and accommodation and informs the student of the available channels of appeal; or
 - b) requests additional information.

[Accommodation Dialogue](#)

Once a student has been certified as a student with a disability within the scope of this policy and is therefore deemed eligible for accommodation within the scope of this policy, the ADA Coordinator reviews the student's request for accommodation(s) and consults and works with the student and other appropriate members of the College administration to formulate and communicate a proposed course of action that would constitute a reasonable accommodation of the student's disability, given the nature and extent of the disability, the student's compensatory skills, course or program requirements (to the extent applicable, given the scope of this policy and the College's unique curriculum), and College resources.

In reaching certification and accommodation decisions, the ADA Coordinator may, in their discretion, consult discretely and/or confidentially with appropriate professionals within and/or outside the College regarding the interpretation, appropriateness and validity of requests and documentation submitted in connection with this procedure.

The College reserves the right to recommend accommodations that differ from the specific approaches suggested by the student or individuals documenting the student's disability, so long as the accommodations proposed by the ADA Coordinator achieve the objective of program accessibility as required by law.

Agreed-upon accommodations will be documented in a written accommodations plan that will be signed by the student and the ADA Coordinator. If accommodations are not agreed upon, the ADA Coordinator will provide to the student a written (or e-mail) description of what accommodations were deemed reasonable and offered by the College.

If accommodations acceptable to the student cannot be developed through cooperative dialogue, the student may appeal the decision of the ADA Coordinator through the Appeals Process described in Section III below.

Role of the Student

Landmark College neither imposes accommodations on its students nor pre-empts their responsibilities, as legal and social adults, to identify their accommodation within the scope of this policy and to ensure that these needs are being met.

It is the student's responsibility to initiate the certification process described above by:

1. completing the [Accommodation Request Form](#) in a timely manner;
2. ensuring that the ADA Coordinator has received appropriately current, adequate and comprehensive medical and/or psychological documentation of a disability and the manner in which it limits a major life activity relevant to the student's participation in Landmark's programs.

A student who has received disability certification must work cooperatively with the ADA Coordinator and other designated staff and faculty to determine and sustain reasonable and appropriate academic accommodations.

Once a written accommodation plan has been agreed upon by the student and the ADA Coordinator, the student is responsible for taking reasonable steps to ensure that the plan is meeting their accommodation needs. Students are therefore responsible for:

1. Communicating with designated administrators, faculty & staff;
2. Keeping appointments with designated administrators, faculty & staff to avoid delays in implementation; and
3. Conferring with designated administrators, staff, and the ADA Coordinator as necessary regarding the effectiveness of accommodations.

If a student perceives a need for additional accommodations or for the modification of existing accommodations, the student must request, in writing, a revision of the accommodation plan. Such requests should be addressed to the ADA Coordinator. Providing reasonable accommodations requires timely student input. It may be impossible to arrange accommodations that are not requested in a timely manner.

Documentation

The College requires appropriately current documentation of any disabilities for which accommodation is requested under this policy, provided at the expense of the student requesting accommodation, prior to making certification or accommodation decisions. Documentation of impairments furnished by the student will be handled discretely and will only be shared in a manner consistent with other College policies and practices and student authorizations regarding student medical or psychoeducational records.

Since insufficient information may jeopardize the accommodations process, the College reserves the right to request additional documentation considered necessary to the formulation of a reasonable and appropriate accommodation plan. The cost of obtaining any such additional

documentation shall be borne by the student. The College also reserves the right to request an independent evaluation by a professional of its choosing. The cost of obtaining any such independent evaluation shall be borne by the College.

Generally, documentation must:

1. be prepared by a qualified healthcare provider or other appropriate professional with relevant expertise in the diagnosis of such conditions;
2. demonstrate the manner in which the impairment substantially limits the student's performance of one or more major life activities;
3. include information regarding the testing procedures followed, the instruments used to assess the impairment, the test results, and a written interpretation of these results as they pertain to an educational environment and/or participation in the College's programs;
4. reflect the student's present level of functioning in the areas related to the particular accommodations being sought;
5. be appropriately recent, e.g., prepared within the last several years before the first request for accommodation. Note: The College recognizes that some disabilities are permanent or lifelong and may not require recent re-evaluation when prior documentation remains relevant and sufficient to establish disability and functional limitations.

In the absence of the documentation outline above, the College may consider the following as sufficient for establishing disability and a need for accommodation when structured by an interview or questionnaire:

1. The student's self-report of their experience of a disability, barriers, and effective and ineffective accommodations.
2. The impressions and conclusions formed by qualified professionals during interviews and conversations with the student.
3. An evaluation of the effectiveness of previously implemented or provisional accommodations. Experienced disability professionals should feel comfortable using their observations of students' language, performance, and strategies as an appropriate tool in validating student narrative and self-report.

The ADA Coordinator determines whether the documentation submitted is adequate to support certification or a requested accommodation and whether the individual preparing the documentation is qualified to make the diagnosis at issue.

Appeal Procedures

Summary: Explains how students may appeal an accommodation decision they believe is incorrect or insufficient, including the timeline, who reviews the appeal, and what outcomes are possible.

A student may appeal any decision made under this policy by the ADA Coordinator that is communicated in writing or by e-mail. Appeals may be based upon, for example: newly discovered evidence; a challenge to a decision not to certify a student as a person with a disability within the

scope of this policy; a challenge to a decision not to provide a particular accommodation; and/or issues regarding documentation of disabilities.

Any appeal must be submitted to the Office of the President of the College within 10 calendar days of the written (or e-mail) decision appealed. The appeal should state the grounds for the appeal in detail. A copy of the appeal must also be provided to the ADA Coordinator at such time. The President will either decide the appeal personally, or will designate another administrative official to do so. Temporary relief pending appeal, in the form of the accommodations sought or otherwise, may be requested in writing along with the appeal. Such relief may be granted by the President or designated administrative officer, at his or her discretion.

As soon as practicable following receipt of the copy of the appeal from the student, the ADA Coordinator will provide to the President's Office a copy of the student's [Accommodation Request Form](#), attached documentation, and record of other communications with the student or other documents that might be relevant to the appeal. The President or designated official may review such documents in reaching a decision on the appeal.

The President or designated administrative officer may, at his or her discretion:

1. grant the appeal and order that the requested accommodation be provided as requested;
2. propose an alternative accommodation, and remand the matter to the ADA Coordinator so that an accommodation dialogue may be had regarding the proposed alternative (another appeal may follow if that does not resolve the matter);
3. request more information from the student, the ADA Coordinator, and/or other appropriate individuals;
4. deny the appeal, which would be the College's final decision; or
5. take other action deemed appropriate at the discretion of the President or administrative officer.

Complaints Regarding Disability-Related Harassment and Discrimination

Summary: Provides the process for reporting harassment or discrimination based on disability, identifies who handles such complaints, and describes available external complaint pathways including the OCR.

In addition to the above-stated appeals process regarding accommodations decisions, students who feel that they have been harassed or discriminated against on the basis of their disability, in violation of Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, or other applicable law, may file a formal or informal complaint with the College or otherwise, as described in the harassment policy found elsewhere in the Student Handbook.

Assistance For Students With Temporary Impairments

Summary: Explains that students with temporary conditions such as injuries or short-term illness may request temporary adjustments, which are handled separately from formal ADA accommodation processes.

Some temporary impairments may qualify as disabilities under applicable federal or state law, depending on the nature, severity, duration, and functional impact of the condition. Examples may

include, but are not limited to, concussions, surgeries, temporary mobility impairments, pregnancy-related impairments, significant medical conditions, or other short-term impairments that substantially limit one or more major life activities.

Students experiencing temporary impairments who believe they may require accommodations or support should contact the ADA Coordinator as soon as possible to discuss their circumstances and available options. The College will engage in an individualized assessment and interactive process to determine whether the student may qualify for reasonable accommodations under applicable law or whether other forms of support or assistance may be appropriate.

Depending on the circumstances, the College may coordinate reasonable accommodations, temporary academic adjustments, housing modifications, accessibility assistance, or other supportive measures through the ADA Coordinator and other appropriate College offices or programs.

Requests for accommodations related to temporary impairments should be supported by appropriate documentation describing the nature of the condition, expected duration, functional limitations, and recommended accommodations when relevant.

The provision of temporary assistance, academic adjustments, or supportive measures does not necessarily mean that a student has been determined to be an individual with a disability under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, or other applicable law.

Determinations regarding eligibility for disability accommodations will be made on an individualized basis consistent with applicable legal standards.

Students with questions regarding temporary impairments or requests for assistance should contact the 504/ADA Coordinator.

Service & Emotional Support Animals

Summary: Distinguishes between service animals and emotional support animals, describes the College's policies for each in campus and residential settings, and explains the approval process for ESAs.

Service Animals

A Service Animal is defined as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Under specific circumstances, the College may allow the use of a miniature horse by an individual with a disability if the miniature horse has been individually trained to do work or perform tasks for the benefit of the individual with a disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition.

The work or tasks performed by a service animal must be directly related to the individual's disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, providing non-violent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and

assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors.

The crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA or this policy.

Individuals with disabilities will be permitted to be accompanied by their service animals in all areas of College facilities where members of the public, participants in services, programs or activities, or invitees, as relevant, are allowed to go.

Service animals need not have special certification or identification in order to qualify as such. They need only be required because of a disability and to be trained to work or perform a task. If it is not readily apparent what work an animal performs, Landmark personnel will limit inquiries to only two questions, which are:

1. Is this animal a service animal required because of a disability?
2. What task or work has this animal been trained to perform?

Students who plan to bring a service animal to campus are encouraged to provide the College with enough advanced notice as possible to allow for appropriate and compatible housing assignments.

Emotional Support Animals

According to current regulations as interpreted by the federal United States Department of Housing and Urban Development, Landmark College residence halls fall under the Fair Housing Act (FHA). Under the FHA, the College is required to provide reasonable accommodations for people with disabilities living in residence halls. Emotional Support Animals are considered a reasonable accommodation under the FHA.

Emotional Support Animals (ESAs) are defined as an animal (not limited to dogs) that is necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling and provides identifiable support or assistance that alleviates one or more identified symptoms or effects of a person's disability.

Because ESAs that do not qualify as service animals are covered only by the FHA, they are allowed only in residence halls on campus and only in the room of the student who has been approved for this accommodation. They will be allowed in outdoor spaces only under proper handling when appropriate, but they are not allowed in other buildings on campus or in residence hall common spaces.

Requesting Permission to Use Emotional Support Animals

Because housing assignments with ESAs require extra care and planning when determining appropriate placement and roommate matches, the College requires as much advance notice as possible to allow for this accommodation. The College will attempt to honor all appropriately supported requests but may not be able to do so if allowing the accommodation would cause an unreasonable hardship, threat, or impact on other students or any program.

In order to request permission to use an Emotional Support Animal, a student must initiate the accommodation process through the 504/ADA Coordinator by:

1. Completing a [Accommodation Request Form](#) and
2. Providing supporting documentation of their disability and of their need for an Emotional Support Animal. Generally, such documentation must:
 - a. be prepared by a qualified healthcare provider or other qualified professional qualified in the diagnosis of such conditions;
 - b. include information regarding the testing procedures followed, the instruments used to assess the disability, the test results, and a written interpretation of these results as they pertain to the need for an Emotional Support Animal
 - c. reflect the student's present level of functioning in the area related to the request for an Emotional Support Animal
 - d. be appropriately recent, e.g., prepared within the last several years before the first request for accommodation. Note: The College recognizes that some disabilities are permanent or lifelong and may not require recent re-evaluation when prior documentation remains relevant and sufficient to establish disability and functional limitations.

As noted above, documentation should be submitted to the ADA Coordinator as far in advance of the period for which the accommodations are requested as possible. The College may not be able to arrange for accommodations that are not requested in a timely manner.

A full description of documentation requirements may be found in the College's general [Accommodations Policy](#) found in the Student Handbook.

Appeals Process

Any person dissatisfied by a decision concerning a service animal or an ESA may appeal the decision of the ADA Coordinator by submitting a letter of appeal to the Office of the President of the College within 10 calendar days of the written (or e-mail) decision appealed.

A full description of the appeals process may be found in the College's general [Accommodations Policy](#) found in the Student Handbook.

Service & Emotional Support Animal Care, Supervision & Control

- Unless they are in a Residence Hall room, animals must be accompanied by their owners/handlers and under their control at all times. Owners/handlers are responsible for their animal's behavior in both public and private areas, and they must ensure their animals are harnessed or on a leash at all times.
- Owners/handlers are responsible for cleaning and grooming related to their animal including bathing and grooming, pest control, and sanitary disposal of animal waste in designated area dumpsters.
- The owner/handler is responsible for any property damage caused by their animal.
- To the extent possible, the animal should be unobtrusive to other individuals and the learning, living, and working environment.

Licensing

The animal must be licensed and vaccinated in accordance with Vermont state, county, and/or municipal laws. The vaccination tag and license must be worn by the animal at all times. When wearing such an item is not practical, then the information must be made readily available upon request.

Exclusion of Service or Emotional Support Animals

Landmark College reserves the right to exclude a Service or Emotional Support Animal under certain circumstances, including, but not limited to the following:

1. The animal is out of control and the animal's handler does not take effective action to control it.
2. The animal is not housebroken.
3. When the animal poses a substantial and direct threat to health or safety (examples include a very ill animal, a substantial lack of cleanliness of the animal, aggressive behavior of the animal, or the presence of an animal in a sensitive area like a medical facility, laboratories, or mechanical or industrial areas).
4. When the presence of the animal constitutes a fundamental alteration to the nature of the program or service.
5. If the College determines that the animal is being subjected to neglect or mistreatment.

Landmark College will make those determinations on a case-by-case basis.

Digital Accessibility Policy

Summary: States the College's commitment to ensuring all digital content, platforms, and technology used in the program are accessible to students with disabilities in accordance with applicable standards.

Policy Statement

Landmark College is committed to ensuring equal access to all digital content, services, and technologies for individuals with disabilities. In alignment with the Americans with Disabilities Act (ADA) Titles II and III and the [Web Content Accessibility Guidelines \(WCAG\) 2.2](#) Level AA, the College strives to provide digital environments that are accessible (i.e., perceivable, operable, understandable, and robust¹.)

Digital accessibility is a shared institutional responsibility and reflects our commitment to equitable access, student success, and inclusive design.

Scope of Policy

¹ The Web Content Accessibility Guidelines (WCAG) are built on four foundational principles known by the acronym POUR: Perceivable, Operable, Understandable, and Robust. These principles ensure digital content is accessible to people with disabilities by requiring that information be presented clearly, navigation be functional, content be easy to comprehend, and it work with assistive technology.

[Introduction to Understanding WCAG 2.2 | WAI | W3C](#)

This policy is effective as of **January 1, 2027**, and applies to all digital content and technologies created, purchased, maintained, required, or used by the College, including:

- College websites and web applications
- Learning Management Systems (LMS) and course materials
- Digital documents (PDFs, Word, PowerPoint, Canva, etc.)
- Audio and video media
- Third-party platforms and software
- Email communications and digital forms
- Mobile applications and digital tools used in instruction or operations

Standards and Legal Compliance

The College is committed to ensuring digital accessibility through adherence to recognized technical standards and compliance with applicable federal civil rights laws.

Technical Accessibility Standard

- **The College adopts the Web Content Accessibility Guidelines (WCAG)2.2 Level AA** as the baseline technical standard for the design, development, and evaluation of digital content and technologies.

Legal and Regulatory Compliance

- The College complies with all applicable requirements of the Americans with Disabilities Act (ADA) Titles II and III and Section 504 of the Rehabilitation Act of 1973, which prohibit discrimination on the basis of disability and require equal access to programs, services, and activities.

Accessibility must be considered at the point of creation and maintained over time.

Where differences exist between technical standards and legal requirements, the College will apply the feasible approach that results in the greater level of access and inclusion.

Institutional Responsibilities

The College is responsible for ensuring that all digital content, systems, and services provide equitable, timely, and effective access to individuals with disabilities in accordance with applicable federal law and institutional standards.

While WCAG remediation is not required for archived or inactive digital content, the College will provide remediated content related to programs, services, and information in an accessible format in a timely manner upon request.

Administration

The College will:

- Establish and monitor compliance with accessibility standards
- Provide training and resources for faculty and staff
- Conduct periodic audits of digital content and systems
- Ensure procurement processes include accessibility review

Faculty and Staff

Faculty and staff are responsible for:

- Making a good faith effort to ensure that all digital materials they create, use, or distribute are accessible and compliant with this policy.
- Maintain accessibility of materials on an ongoing basis
- Participate in required training and professional development related to accessibility
- Responding promptly to accessibility concerns

Accommodations and Access Support

Students, faculty, staff, and visitors who experience barriers to digital access may request accommodation or alternative formats as outlined in the College's [Accommodation Policy and Procedures](#)

Request Process

Individuals may request an accommodation by completing the online [Accommodation Request Form](#) or contacting the [Vice President for Student Affairs](#).

Requests should include:

- Description of the accessibility barrier
- Location (URL, course, document, etc.)
- Requested format or accommodation (if known)

The College will respond in a timely and individualized manner, typically within 3–5 business days, depending on complexity.

Grievance Procedure for Digital Accessibility

The Digital Accessibility Grievance Procedure follows the College's established grievance processes for students and faculty/staff as outlined in their respective handbooks, ensuring consistency in approach and resolution.

When possible, concerns should begin with an informal resolution process, with formal procedures providing for review and determination within a typical 10-business-day timeframe if escalation is necessary.

For Grievances Initiated by a Student:

- Refer to the **Grievance Policy and Procedures** published in the current edition of the [Student Handbook](#).
- Questions or a request to meet for more information may be directed to the [Vice President for Student Affairs](#).

For Grievances Initiated by a Faculty or Staff Member:

- Refer to the **Formal Grievance Procedure** published in the current edition of the [Employee Handbook](#).
- Questions or a request to meet for more information may be directed to the [Director of Human Resources](#).

Individuals initiating an informal or formal grievance for digital accessibility should keep records of and be ready to provide:

- Description of the issue
- Date(s) of occurrence
- Any prior attempts to resolve
- Desired resolution (if known)

Prohibition of Retaliation and Coercion

The College strictly prohibits retaliation, intimidation, coercion, or interference against any individual who, in good faith:

- Requests an accommodation or accessible format
- Reports a digital accessibility barrier
- Files or participates in a complaint or grievance
- Assists or advocates on behalf of another individual regarding accessibility concerns

Retaliation includes any adverse action that would discourage a reasonable person from engaging in protected activity, including but not limited to changes in academic standing, employment conditions, access to programs or services, or participation in College activities.

Any individual who believes they have experienced retaliation or coercion in violation of this policy is encouraged to report the concern through the College's established grievance procedures. Reports of retaliation will be reviewed promptly and addressed in accordance with applicable institutional policies and federal law.

Continuous Improvement

The College is committed to ongoing improvement and will:

- Regularly review and update accessibility policies and practices
- Provide training and professional development on current accessibility policies and practices.
- Incorporate accessibility into institutional planning and procurement
- Engage users with disabilities in evaluation and feedback

Appendix B: Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence, and Stalking Policy

Notice of Nondiscrimination on the Basis of Sex

Summary: States the College's legal obligation under Title IX not to discriminate on the basis of sex and identifies the Title IX Coordinator as the designated contact for related concerns.

Landmark College does not discriminate on the basis of sex in its education programs and activities, and Title IX of the Education Amendments Act of 1972, as amended ("Title IX"), as well as applicable state law, requires that it not discriminate in such a manner. Prohibited sex discrimination includes sexual harassment and other behaviors as outlined in this policy. In addition to violating College policy, sexual harassment may also be unlawful. Inquiries concerning the application of Title IX may be referred to the College's Title IX coordinator (see below) or to the United States Department of Education Office for Civil Rights. The OCR Region I office's contact information is: Office for Civil Rights, Boston Office, U.S. Department of Education, 8th Floor, 5 Post Office Square, Boston, MA 02109-3921, Telephone: 617-289-0111, Facsimile: (617) 289-0150, Email: OCR.Boston@ed.gov).

Scope of Policy

Summary: Defines which conduct, individuals, and locations fall within the coverage of the Title IX policy, including conduct occurring off campus when it affects a student's access to the program.

This policy and the procedures outlined below apply exclusively to reported conduct that falls within the scope of the policy, and supersede any other previously-published College policies on issues related to sexual harassment, sexual misconduct, domestic violence, dating violence or stalking. Further, to the extent that this policy and its procedures provide for the handling of allegations that fall within the definition of Title IX Sexual Harassment, such allegations will be handled exclusively as provided in this policy and its procedures, rather than any policies or handbook procedures that would otherwise apply to college students, faculty or staff.

This Policy will be used by the College to address incidents alleged to have taken place on or after August 14, 2020. Any incidents alleged to have taken place prior to August 14, 2020 will be addressed through the policies and procedures outlined in the Sexual Harassment, Sexual Misconduct, Dating Violence, Domestic Violence and Stalking Policy published in the 2019-2020 Student Handbook and not through the policies and procedures outlined in this policy. This delineation of applicable policies and procedures will apply regardless of when the alleged incident is reported.

In Title IX Sexual Harassment cases and Non-Title IX Misconduct cases as defined below that involve allegations that a student engaged in Prohibited Conduct, the policy language, and procedures for both categories of cases outlined below will apply.

In Title IX Sexual Harassment cases as defined below that involve allegations that a College employee engaged in Title IX Sexual Harassment, the policy language and procedures for Title IX Sexual Harassment cases outlined below will apply, in accordance with applicable law.

Allegations that a College employee engaged in discrimination or harassment that do not fall within the definition of Title IX Sexual Harassment will be addressed through other employment-related policies, practices, handbooks and/or collective bargaining agreements, but will not be addressed through the policy language or procedures outlined in this policy.

To understand how to file a complaint of sexual harassment/misconduct, domestic violence, dating violence and/or stalking at Landmark College, please see the section below on Complaint Procedures.

Title IX Coordinator

Summary: Identifies the College's Title IX Coordinator, describes their responsibilities for overseeing compliance and managing reports, and provides contact information for students and staff.

The Vice President for Student Affairs is the designated Title IX Coordinator for Landmark College and is authorized to and responsible for coordinating the College's efforts to comply with and carry out its responsibilities under Title IX.

The contact information for the Landmark College Title IX Coordinator is:

Michael Luciani, Vice President for Student Affairs

Landmark College

19 River Rd South

Putney, Vermont 05346

(802) 387-6713 mluciani@landmark.edu

The Title IX Coordinator is available to meet with students and employees as needed. References throughout this policy to the Title IX Coordinator should be read as also including designees of the Title IX Coordinator.

General Definitions

Summary: Defines key terms used throughout the Title IX policy, including complainant, respondent, sexual harassment, consent, and other legally significant concepts.

The definitions of sexual assault, domestic violence, dating violence and stalking used in this policy are consistent with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), as amended effective 2014 and Title IX and May 2020 Title IX regulations.

In its primary prevention and awareness programs for incoming students and new employees, and its ongoing prevention and awareness programs for students and employees, Landmark College includes the definitions of sexual assault, the definition of consent in reference to sexual activity, and the definitions of domestic violence, dating violence and stalking that are used by Vermont criminal laws.

However, the College utilizes its own definitions of these prohibited behaviors for purposes of this policy that are consistent with the Clery Act, as amended effective 2014 and Title IX and May 2020 Title IX regulations, and determines responsibility for violations of College policy through its own procedures and standards of proof (that is, by a preponderance of the evidence standard), not through the procedures or standards of proof employed in the criminal justice system.

Consent

For purposes of the College's Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence and Stalking Policy, and in Vermont law, consent is defined as follows:

"Consent" means the affirmative, unambiguous, and voluntary agreement to engage in a sexual act, which can be revoked at any time. No person subject to this policy shall engage in a sexual act with another person:

- without the consent of the other person; or
- by threatening or coercing the other person; or
- by placing the other person in fear that any person will suffer imminent bodily injury; or
- when the person knows or reasonably should know that the other person is asleep, unconscious, or otherwise unaware that the sexual act is occurring.

No person subject to this policy shall administer any alcohol, drugs, or other intoxicants to another person without the person's knowledge or against the person's will and, while the person is impaired by the alcohol, drugs, or intoxicants, engage in a sexual act with that person.

No person subject to this policy shall engage in a sexual act with another person when the other person is incapable of consenting to the sexual act due to substantial impairment by alcohol, drugs, or other intoxicants and that condition is known or reasonably should be known by the person.

"Incapable of consenting" as used in this policy means the other person:

- is incapable of understanding the nature of the conduct at issue;
- is physically incapable of resisting, declining participation in, or communicating unwillingness to engage in the conduct at issue; or
- lacks the mental ability to make or communicate a decision about whether to engage in the conduct at issue.

A person may be incapable of consenting due to the effects of alcohol, drugs or other intoxicants, or due to a physical, mental or other condition.

Lack of consent may be shown without proof of resistance, and submission resulting from the use of force, threat of force, or placing another person in fear does not constitute consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply to consent to engage in sexual activity with another. Again, consent can be withdrawn at any time.

It is the responsibility of those who initiate and/or engage in sexual activity to be clear that consent as defined in this policy is given before proceeding with further sexual activity. It should be noted that ignorance of the policy noted above, or the intoxication of the respondent, will in no way be considered an excuse for violating the policy. Determinations regarding whether a person is responsible for violating this policy will be made by considering whether the person knew, or a reasonable, unimpaired person in their circumstances should have known, that the other person was not consenting to or was incapable of consenting to the sexual conduct at issue or was asleep, unconscious, or otherwise unaware that the sexual act was occurring.

Complainant

A complainant is a student or employee of the College who is reported to have experienced conduct that could constitute Prohibited Conduct as defined below. In some cases (such as, for example, cases in which a person involved in an alleged incident of Prohibited Conduct does not wish to participate in the process, but the College decides that the alleged misconduct needs to be investigated and addressed), the College may move forward with an investigation and/or related disciplinary proceeding without a designated complainant. In such cases, the College may extend the full rights of a complainant as defined in this policy to affected parties as deemed appropriate by the College and/or as permitted or required by applicable law. For ease of reference and consistency, the term “complainant” is used hereafter in this policy to refer to a person who believes that he or she has been subjected to Prohibited Conduct, or who is believed by another to have been subjected to such conduct.

Respondent

A respondent is a student, employee or covered third party (to the extent the College elects to address reports regarding a covered third party through this policy, rather than otherwise at the College’s discretion) who has been reported to be the perpetrator of conduct that could constitute Prohibited Conduct as defined in this policy. A covered third party is a person who is not a student or employee of the College, but who is someone over whom the College has some measure of control that would allow the College to take some form of action against them if it is determined that they engaged in Prohibited Conduct (e.g., a vendor or volunteer). Again, such individuals will be provided rights under this policy on to the extent the College elects to do so.

Officials with Authority

Officials with authority to institute corrective measures regarding matters involving Prohibited Conduct include the College’s Title IX Coordinator, whose contact information is provided above and any designee. An Official With Authority will, upon receipt of a formal complaint of *Title IX Sexual Harassment*, take action on such a complaint in accordance with the procedures outlined below.

Retaliation

Retaliation means intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations or this 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 regarding Prohibited Conduct (including both Title IX Sexual Harassment and Non-Title IX

Misconduct). Retaliation is strictly prohibited. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations, constitute retaliation, as do any adverse action taken against a person because they have made a good faith report of Prohibited Conduct or participated in any proceeding under this Policy. Retaliation may include intimidation, threats, coercion, harassment, or adverse employment or educational actions that would discourage a reasonable person from engaging in activity protected under this policy. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance process under this policy does not constitute prohibited retaliation, provided, however, that a determination regarding responsibility is not alone sufficient to establish that any party made a materially false statement in bad faith.

The College will not engage in, and will investigate and address, reports of retaliatory conduct. Retaliation under this policy may be found whether or not the underlying complaint is ultimately found to have merit.

Any person who believes that he or she has been subjected to such retaliation should follow the complaint resolution procedures outlined for general grievances in the Student Handbook.

Prohibited Conduct

Summary: Lists all forms of conduct prohibited under the Title IX policy, including sexual harassment, sexual assault, stalking, dating violence, domestic violence, and retaliation.

This Policy prohibits the following forms of misconduct, collectively referred to throughout the policy as “Prohibited Conduct”:

- Title IX Sexual Harassment (i.e., Quid Pro Quo Sexual Harassment, Severe, Pervasive and Objectively Offensive Sexual Harassment, Sexual Assault, and Domestic Violence, Dating Violence, and sex-based Stalking within the scope of Title IX); and
- Non-Title IX Misconduct (i.e., Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking outside the scope of Title IX, Sexual Exploitation as defined below, and Retaliation).

Specifically, Title IX Sexual Harassment and Non-Title IX Misconduct are defined as follows for purposes of this Policy:

Title IX Sexual Harassment

Under Department of Education regulations issued in May 2020 the College is required to prohibit certain forms of sexual harassment as defined in those regulations. Title IX Sexual Harassment is Prohibited Conduct of the following types committed by or against students and/or employees in an education program or activity of the College, in the United States. Further, in order for the College to consider a Formal Complaint of such misconduct as falling within its Title IX Sexual Harassment policy and procedures, the complainant must be participating in or attempting to participate in a College program or activity at the time the complaint is filed.

Conduct takes place within the College’s “programs and activities” when that conduct occurs:

- (1) in a location, at an event, or in a circumstance where the College exercises substantial control over both the respondent and the context in which the conduct occurs; or
- (2) in any building owned or controlled by a student organization recognized by the College.

Conduct that occurs off campus in locations or at events with no connection to the College is unlikely to have occurred in a program or activity of the College.

A complaint about conduct that does not meet this strict definition for Title IX Sexual Harassment is still prohibited by the College if it otherwise constitutes Prohibited Conduct within the definition of Non-Title IX Misconduct as defined below.

The following Prohibited Conduct definitions apply for purposes of the definition of Title IX Sexual Harassment:

Title IX Quid Pro Quo Sexual Harassment

Quid Pro Quo Sexual Harassment for purposes of the Title IX Sexual Harassment definition is conduct on the basis of sex committed in an education program or activity of the College in the United States by which an employee of the College conditions the provision of an aid, benefit, or service of the College on a student's or employee's participation in unwelcome sexual conduct.

Title IX Severe, Pervasive and Objectively Offensive Sexual Harassment

Severe, Pervasive and Objectively Offensive Sexual Harassment for purposes of the Title IX Sexual Harassment definition is conduct on the basis of sex committed in an education program or activity of the College in the United States that constitutes unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a student or employee equal access to a the College education program or activity.

Title IX Sexual Assault

As required by the May 2020 Title IX regulations, Title IX Sexual Assault incorporates the definitions of the FBI's Uniform Crime Reporting (NIBRS) program, and is defined as follows:

1. Rape
 - a. The carnal knowledge of a person (i.e., penile-vaginal penetration), without the consent of that person, including instances where the person is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity (it should be noted that either females or males could be complainants under this definition);
 - b. Oral or anal sexual intercourse (i.e., penile penetration) with another person, without the consent of that person, including instances where the person is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;
 - c. To use an object or instrument (e.g., an inanimate object or body part other than a penis) to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of that person, including instances where the person is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;

2. **Fondling:** The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of that person, including instances where the person is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity (for purposes of this definition, “private body parts” includes breasts, buttocks, or genitals, whether clothed or unclothed);
3. **Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law; or
4. **Statutory Rape:** Sexual intercourse with a person who is under the statutory age of consent.

Sexual assault can be committed by any person against any other person, regardless of gender, gender identity, sexual orientation, or past or current relationship status. Sexual assault may occur with or without physical resistance or violence.

Any incident falling within this definition is a violation of College policy and is prohibited.

Title IX Dating Violence

Title IX Dating Violence for purposes of the Title IX Sexual Harassment definition is conduct on the basis of sex committed in an education program or activity of the College in the United States that constitutes violence committed by a person who is 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 reporting party’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:

1. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
2. Dating violence does not include acts covered under the definition of domestic violence.

Any incident falling within this definition is a violation of College policy and is prohibited.

Title IX Domestic Violence

Title IX Domestic Violence for purposes of the Title IX Sexual Harassment definition is conduct on the basis of sex committed in an education program or activity of the College in the United States that constitutes a felony or misdemeanor crime of violence committed:

1. By a current or former spouse or intimate partner of the victim;
2. By a person with whom the victim shares a child in common;
3. By a person who is cohabiting with, or has cohabited with, the victim as a spouse or intimate partner;
4. By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
5. By any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Any incident falling within this definition is a violation of College policy and is prohibited.

Title IX Stalking

Title IX Stalking for purposes of the Title IX Sexual Harassment definition is conduct on the basis of sex committed in an education program or activity of the College in the United States that constitutes engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's safety or the safety of others; or
2. Suffer substantial emotional distress.

For purposes of this definition:

1. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker 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.
2. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
3. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Examples of stalking behaviors or activities include, but are not limited to the following, if they occur in the context of stalking as defined above (i.e., the behaviors or activities would cause a reasonable person to fear for their safety or the safety of others, or to suffer substantial emotional distress):

1. non-consensual communication, including face-to-face communication, telephone calls, voice messages, e-mails, text messages, written letters, gifts, or any other communications that are unwelcome;
2. use of online, electronic or digital technologies, such as posting pictures or text in chat rooms or on websites, sending unwanted or unsolicited e-mail or talk requests, posting private or public messages on Internet sites, social networks, and/or school bulletin boards, installing spyware on a person's computer, or using Global Positioning Systems (GPS) or similar technology to monitor a person;
3. pursuing, following, waiting for, or showing up uninvited at or near a residence, workplace, classroom, or other places frequented by the person;
4. surveillance or other types of observation, including staring and voyeurism;
5. trespassing;
6. vandalism;
7. non-consensual touching;
8. direct verbal or physical threats against a person or a person's family member, pet or personal property;
9. gathering information about a person from friends, family, or co-workers;
10. accessing private information through unauthorized means;

11. threats to harm self or others;
12. defamation and/or lying to others about the person; and
13. using a third party or parties to accomplish any of the above.

Behaviors or activities that fall within this definition are violations of College policy and are prohibited.

Non-Title IX Misconduct

Non-Title IX Misconduct is Prohibited Conduct that falls within the definitions below but that does not fall within the definition of Title IX Sexual Harassment, either due to the nature of the conduct or because it did not reportedly occur within a program or activity of the College in the United States.

Reported behavior that falls within the definition of Non-Title IX Misconduct is defined here but will be addressed separately through the College's general disciplinary process located in the Student Handbook (for students) or Employee Handbook (for staff & faculty).

Non-Title IX Sexual Harassment

Non-Title IX Sexual Harassment is a form of sex discrimination that includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that has the purpose or effect of substantially interfering with an individual's work or academic performance or creating an intimidating, hostile, or offensive working, shared living, or educational environment, on the basis of sex. The College will determine whether conduct falls within this definition by using both an objective standard (that is, would a reasonable person experience the conduct as intimidating, hostile or offensive as defined here) and a subjective standard (that is, did the person actually perceive the conduct as intimidating, hostile or offensive as defined here).

Examples of sexual harassment include, but are not limited to the following, when such acts or behavior come within the above definition:

- touching or grabbing any part of a person's body (in a manner that is sexual or offensive on the basis of sex but that does not constitute "fondling", which is a form of Title IX Sexual Assault or Non-Title IX Sexual Assault as defined above and below) after that person has indicated, or it is known or should be known, that such physical contact is unwelcome;
- continuing to ask a person to socialize on or off-campus when that person has indicated that they are not interested;
- displaying or transmitting sexually suggestive pictures, objects, cartoons, messages, web links or posters if it is known or should be known that the behavior is unwelcome;
- continuing to write sexually suggestive notes or letters if it is known or should be known that the person does not welcome such behavior;
- referring to or calling a person a sexualized name if it is known or should be known that the person does not welcome such behavior;
- regularly telling sexual jokes or using sexually vulgar or explicit language in the presence of a person if it is known or should be known that the person does not welcome such behavior;

- communicating derogatory or provoking remarks about or relating to a person's sex, gender identity or sexual orientation;
- directing harassing acts or behavior against a person on the basis of their sex, gender identity or sexual orientation; or
- off-campus conduct which falls within the above definition and affects a person's on-campus educational, shared living, or work environment.

Sexual Harassment that meets the definition of Title IX Sexual Harassment outlined above will be addressed under the procedures for Title IX Sexual Harassment provided in this policy.

Landmark College recognizes that the protection of free and open speech and the open exchange of ideas is important to any academic community. This recognition is therefore an important element in the objective "reasonable person" standard used in judging whether sexual harassment has occurred. This policy is meant neither to proscribe nor to inhibit discussion, in or out of the classroom, of complex, controversial or sensitive matters, when in the judgment of a reasonable person they arise appropriately and with respect for the dignity of others.

Landmark College also recognizes, however, that verbal conduct can be used specifically to intimidate or coerce and to inhibit genuine discourse, free inquiry, and learning. Such abuses are unacceptable. If someone believes that another's speech or writing is offensive, wrong, or hurtful, they are encouraged to express that judgment in the exercise of their own free speech or to seek redress under this policy or other College policies as appropriate.

Non-Title IX Sexual Assault

Sexual Assault (i.e., rape, fondling, incest or statutory rape) as defined in the Title IX Sexual Assault definition above that did not reportedly occur in a program or activity of the College in the United States, and attempts to commit such misconduct.

Non-Title IX Domestic Violence

Domestic violence as defined in the Title IX Domestic Violence definition above that did not reportedly occur in a program or activity of the College in the United States.

Non-Title IX Dating Violence

Dating violence as defined in the Title IX Dating Violence definition above that did not reportedly occur in a program or activity of the College in the United States.

Non-Title IX Stalking

Stalking as defined in the Title IX Stalking definition above that did not reportedly occur in a program or activity of the College in the United States, or that otherwise fits within the definition of stalking but does not fall within the Title IX Stalking definition because the reported conduct is not directed at the complainant on the basis of sex.

Non-Title IX Sexual Exploitation

Non-Title IX Sexual Exploitation occurs when a person takes sexual advantage of another person for the benefit of anyone other than that other person without that other person's consent, and attempted sexual exploitation. Examples of sexually exploitative behavior include, but are not limited to:

- (1) video recording or photographing of sexual acts or nudity of another member of the College community without the consent of a person involved;
- (2) transmitting such video recordings or photographs without the consent of the person involved;
- (3) viewing or allowing or aiding others to view another person's sexual activity, intimate body parts, or nudity without the person's consent; and (4) sexual exhibitionism or exposure of one's genitalia in the presence of others without their consent.

Coordination With Other Policies

Summary: Explains how the Title IX policy interacts with other College policies and with Vermont mandatory reporting law, and how overlapping obligations are handled simultaneously.

Where alleged conduct by a student respondent that is reported in connection with a reported violation of this policy also involves potential violations of the Landmark College Student Code of Conduct that would not constitute sexual harassment, sexual misconduct, domestic violence, dating violence or stalking covered by this policy, the College may, at its discretion, choose to investigate and resolve such other potential Student Code of Conduct violations through an investigation under the procedures set forth in this policy, rather than the procedures set forth in the Student Code of Conduct.

Where alleged conduct by an employee or covered third party respondent that is reported in connection with a reported violation of this policy also potentially involves violations of Landmark College's expectations for employee or covered third party behavior, the College may address such reported violations of other behavioral expectations within or outside the procedures provided below, as determined at the College's discretion.

Separate Handling of Other Policy Violations By Reporting Students

Summary: States that the College will not use information disclosed in a Title IX report to bring unrelated conduct charges against the reporting student, subject to limited exceptions for serious safety concerns.

The College's primary goals when responding to complaints of Prohibited Conduct such as sexual harassment/misconduct, domestic violence, dating violence or stalking matters involving students is to promote safety, and to address Prohibited Conduct and prevent it from recurring. An individual should not hesitate to report Prohibited Conduct due to a concern that the investigation process may indicate that he or she was under the influence of alcohol or drugs at the time of the incident. Violations of other College policies will be handled separately from sexual misconduct complaints, and the relatively minor sanctions that may result from a violation of other College policies under the circumstances should not dissuade an individual from reporting relatively serious incidents of Prohibited Conduct. The use of alcohol or drugs never makes the complainant at fault for sexual harassment, sexual misconduct, domestic violence, dating violence or stalking.

Confidentiality

Summary: Describes the limits of confidentiality in Title IX proceedings, identifies truly confidential resources, and explains what information must be disclosed to the Title IX Coordinator and when.

The College understands that individuals who have concerns about sexual harassment/misconduct, domestic violence, dating violence, or stalking may look for assurances of confidentiality.

May 2020 Title IX regulations contemplate that certain information will generally be treated confidentially, except as qualified by statements in those regulations. For example, the regulations provide that colleges and universities must maintain as confidential any supportive measures provided to a complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the supportive measures. The regulations also provide that institutions must keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act (“FERPA”), 20 U.S.C. 1232g, or FERPA regulations, 34 CFR part 99, or as required by law, or to carry out the purposes of the Title IX regulations, including the conduct of any investigation, hearing, or judicial proceeding arising under those regulations.

The College will protect the confidentiality of complainants and other necessary parties to the extent practicable. When the College completes publicly available recordkeeping, including disclosure of information as required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”), it will not include personally identifying information about parties. The Title IX Coordinator or designee will work with the Director of the Department of Public Safety or designee to determine what information about a complainant should be disclosed and to whom this information will be disclosed. Decisions about disclosure will be made by considering factors such as, but not limited to, the privacy interests of the complainant and the potential need for disclosure in order to effectuate the accommodations or protective measures. If it is decided that some disclosure is necessary, complainants will be informed of which information will be shared, with whom it will be shared and why.

Professional Mental Health Therapists and Health Services Professionals as Confidential Resources

At Landmark College, the professional mental health and health services staff respect and protect confidential communications with clients to the extent that they are able to do so under applicable law. This means that in most cases, these confidential resources will not inform anyone of such communications without a client’s consent, and the College will not endeavor to take any action in response to such communications. These professionals may have the responsibility to disclose otherwise-privileged information appropriately when they perceive an immediate and/or serious threat to any person or property. In addition, medical and mental health professionals are required by law to report any allegation of sexual assault of a person under age 18.

In accordance with May 2020 Title IX regulations, the College will not access, consider, disclose, or otherwise use a party’s privileged records or require, allow, rely upon, or otherwise use questions

or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

Other College Officials

Other College officials are discreet and strive to respect reasonable privacy expectations to the extent practicable, but they are not able to guarantee confidentiality. General inquiries or questions about this policy and its procedures may remain private, and the College will strive to protect the privacy of individuals to the extent it can while maintaining its obligations to uphold relevant policies and regulations and/or to take reasonable steps to promote the safety of members of the College community. When confidentiality is requested, the College will evaluate the request for confidentiality in the context of its responsibility to provide a safe and nondiscriminatory environment for all students, faculty and staff and to promote the health, safety, or well-being of members of the Landmark community. If an individual who makes a report insists that his or her name or other identifiable information not be revealed and the College is able to respect that request, the College's ability to respond fully to the reported behavior may be limited.

The College will protect the confidentiality of individuals allegedly subjected to Prohibited Conduct to the extent practicable in light of the need to do investigations and conduct disciplinary proceedings.

Community Assistance and Resources For Victims of Sexual Misconduct, Domestic Violence, Dating Violence, and/or Stalking

Summary: Lists campus and community support resources available to students affected by sexual misconduct, dating violence, domestic violence, or stalking, including counseling, health services, and advocacy.

The level of confidentiality that can be provided by confidential on-campus resources, and the obligations of non-confidential responsible employees, who are respectful and discreet but not necessarily confidential, are described immediately above.

Confidential On-Campus Resources

Meg Spicer, Counselor & Sexual Respect Coordinator	(802) 387-6739
Jeff Huyett, Director of Health Services	(802) 387- 6753
Dawn Kenney, Staff Nurse	(802) 387-6302
Counseling Services	(802) 387-1636

Respectful, Discreet, but Not Necessarily Confidential On-Campus Resources

Resident Directors	
Resident Assistants	
Campus Safety	(802) 387-6899
Michael Giannetto, Director of Campus Safety	(802) 387-1689
Scott Ansevin-Allen, Dean of Campus Life & Director of Res. Life	(802) 387-6411
Craig Marcus, Dean of Students	(802) 387-6362
Michael Luciani, Vice President for Student Affairs	(802) 387-6713

Off-Campus Community Resources

Women's Freedom Center	24-hour Hotline: (802) 254-6954
advocates@womensfreedomcenter.net	Business line: (802)-257-7364
Windham County Victim Advocate	(802) 257-2860
Brattleboro Memorial Hospital ER	(802) 257-8222
Brattleboro Health Center	(802) 258-3905
Windham County Sheriff	(802) 365-4949
Vermont State Police	(802) 722-4600

Reporting and Initial Considerations Regarding Sexual Harassment/Misconduct, Domestic Violence, Dating Violence, Or Stalking Complaints

Summary: Explains all available reporting options, describes what happens immediately after a report is received, and outlines the supportive measures available to complainants regardless of whether a formal complaint is filed.

The reporting opportunities and initial considerations outlined below apply to concerns about and complaints of Title IX Sexual Harassment (which includes Title IX-covered sexual harassment, domestic violence, dating violence, sexual assault and stalking as defined above as Title IX Sexual Harassment) and Non-Title Misconduct (which includes sexual harassment, domestic violence, dating violence, sexual assault, sexual exploitation and stalking as defined above as Non-Title IX Misconduct), whether those concerns involve reported Prohibited Conduct directed against students or employees by students, employees or third parties over whom the College has some measure of control.

Reporting by Employees with Oversight Responsibility

Individuals with supervisory or oversight responsibility (for example, Dean of Students, Assistant Dean, Academic Advisors, Campus Safety Staff, Department Chairs, staff supervisors or faculty) are responsible for promptly reporting to the Title IX Coordinator or Human Resources, any complaint or information they learn regarding sexual harassment/misconduct, domestic violence, dating violence, sexual assault or stalking. Failure by a supervisor to appropriately report such complaints and/or alleged acts could result in disciplinary action.

Any student, faculty or staff member who wishes to report a complaint of or concern about Prohibited Conduct is encouraged to contact the Vice President for Student Affairs (Title IX Coordinator), College security personnel, the Dean of Students, Resident Deans, Academic Advisors, Mental health therapists, College Administrators, and/or local law enforcement officials through the means of contact outlined below.

Any person may report concerns or complaints about Prohibited Conduct 24 hours per day, 7 days per week by email to the Title IX Coordinator, Michael Luciani, at mluciani@landmark.edu, during business hours by phone to the Title IX Coordinator at (802) 3876713, or 24/7 to Campus Safety at (802) 387-6899.

Individuals with a disability may request accommodations to ensure their full and equal participation in reporting incidents of Prohibited Conduct, as well as the investigatory and adjudicatory process under this policy. Requests for accommodations in connection with the reporting, investigatory and/or adjudicatory process are determined on an individual basis by the Title IX Coordinator, in consultation with the ADA/Section 504 Coordinator as appropriate.

When a student or employee reports to the College that the student or employee has been subjected to dating violence, domestic violence, sexual assault, or stalking, whether the reported conduct occurred on or off campus, the College will provide the student or employee a written explanation of the student's or employee's rights and options, as described in this policy.

Complaints of sex discrimination by College students, staff or faculty that do not involve alleged sexual harassment/misconduct, domestic violence, dating violence or stalking as defined in this policy will be handled through the Office of Student Life (for students) and the Human Resource Office (for faculty & staff).

Contacting Law Enforcement and Orders of Protection

In addition to (or instead of) the College's processes, any student or employee who wishes to report a complaint of sexual misconduct, domestic violence, dating violence or stalking may and should also pursue criminal charges with local, state, or federal law enforcement agencies including the Windham County Sheriff's Department or Vermont State Police.

The Office of the Vice President for Student Affairs (Title IX Coordinator), Office of Campus Safety, the Office of the Dean of Students, Human Resources Office and Counseling /Health Services Office will offer to, and will upon request, assist students or employees in contacting law enforcement agencies.. For their own part, a complainant may choose to notify such agencies with or without assistance from the College or may choose not to notify such authorities. The procedures for making a police report will vary depending upon the particular law enforcement agency involved, but in general, making a police report will involve meeting with law enforcement officers for an interview, the collection of evidence, and follow-up communications with law enforcement as their investigation proceeds. Individuals who are being or who may have been subjected to Prohibited Conduct may have the right to obtain orders of protection, restraining orders and/or relief from abuse orders from Vermont courts. The College will support complainants if they wish to have the College's assistance in making contact with law enforcement authorities and other external resources to seek such orders.

The College will respect such orders to the extent applicable. In addition, the College can also impose no-contact conditions on students, employees and third parties over which it has some measure of control. The College will inform complainants of their options in this regard.

Medical Care

Whether or not you decide to pursue criminal charges or a complaint at the College, you are encouraged to immediately seek any necessary medical care after an incident of Prohibited Conduct, and to seek help from appropriate law enforcement, medical or College personnel. Even if you are unsure initially whether you will want to pursue criminal charges or seek a protection order, it is important to preserve all possible evidence in case you decide at some point to do so.

Therefore, you should refrain from changing clothes, showering, or otherwise changing your physical state after an incident, until after you have consulted with medical personnel about how to best preserve evidence.

In cases that have involved sexual contact, a forensic examination by a Sexual Assault Nurse Examiner (“SANE”). is the best way to preserve potentially valuable evidence. S.A.N.E. examinations are available at local hospitals. The College will assist an individual who would like to be transported to the Brattleboro Memorial Hospital for a S.A.N.E. examination. Having a S.A.N.E. examination does not require an individual to file a police report or pursue criminal prosecution or a protection order, but having an examination can be very important if the individual decides at a later time to pursue any of those options.

You should also endeavor to preserve other evidence that may be relevant to a case of Prohibited Conduct, such as text messages, email messages, other electronically stored information, and other physical evidence. If you have questions about how to do this, you should consult with college officials.

Initial Communication with a Complainant

If a report alleges conduct that would, if proved, constitute Prohibited Conduct, the Title IX Coordinator will:

- promptly contact the complainant to discuss the availability of supportive measures as defined below;
- consider the complainant’s wishes with respect to supportive measures;
- inform the complainant of the availability of supportive measures with or without the filing of a formal complaint; and
- explain to the complainant the process for filing a formal complaint.

Supportive Measures

If Prohibited Conduct is reported to college authorities, College personnel will work to determine whether alternative academic, transportation, working and/or living situations are reasonably available and necessary in a particular case. Such measures, which are known as supportive measures, will be provided if requested and reasonably available. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the College’s education programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the College’s educational environment, or deter Prohibited Conduct.

Supportive measures may include but are not limited to:

- access to counseling and medical services;
- assistance in obtaining a sexual assault nurse examination;

- academic accommodations, such as extensions of deadlines or other course-related adjustments, course changes or late drops, or other arrangements as appropriate;
- modifications of work or class schedules;
- assistance in requesting long-term academic accommodations through the Office of Access and Learning Accommodation, if the complainant qualifies as an individual with a disability;
- change in class schedules, including the ability to transfer course sections or withdraw from a course;
- campus escort services and safety planning steps;
- mutual restrictions on contact between parties and/or other individuals;
- residential accommodations, including but not limited to arranging for new housing, or providing temporary housing options, as appropriate;
- assistance navigating off-campus housing concerns;
- changes in work locations;
- leaves of absence;
- increased security and monitoring of certain areas of campus;
- changing transportation or working arrangements or providing other employment accommodations, as appropriate;
- assisting the individual in accessing support services, including, as available, victim advocacy, academic support, counseling, disability, health or mental health services, visa and immigration assistance, student financial aid services, and legal assistance both on and off campus, as applicable;
- voluntary leaves of absence;
- referral to resources which can assist in obtaining an order of protection under Vermont law;
- referral to resources which can assist with financial aid, visa, or immigration concerns;
- no trespass notices prohibiting the presence of an individual on College property; and other similar measures.

Requests for supportive measures should be directed to the Title IX Coordinator. Requests will be evaluated and responded to by the Title IX Coordinator or designee after consultation, as needed, with other campus personnel whose cooperation may be necessary or helpful in evaluating or providing requested measures. The Title IX Coordinator is ultimately responsible for coordinating the effective implementation of supportive measures.

The availability of supportive measures will be determined by the specific circumstances of each report. The College will consider a number of factors in determining which measures to take, including but not limited to the needs of the student or employee seeking supportive measures; the severity or pervasiveness of the alleged conduct; any continuing effects on the parties; whether the

complainant and the respondent share the same residence hall, academic course(s), or job location(s); and whether judicial measures have been taken to protect the complainant (e.g., protective orders or relief from abuse orders).

All individuals are encouraged to report to the Title IX Coordinator any concerns about the failure of another to abide by any restrictions imposed through supportive measures. In the event of an immediate health or safety concern, individuals should contact 911 immediately. The College will take prompt action to enforce a previously implemented measure, and disciplinary penalties can be imposed for failing to abide by a college-imposed supportive measure.

The College will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims both within the institution and in the community.

As noted above, the College will take reasonable steps to maintain as confidential any supportive measures provided, to the extent that maintaining such confidentiality does not impair the College's ability to provide the supportive measures.

Interim Suspension, Emergency Removal and Administrative Leave

Interim Suspension of Students in Non-Title IX Misconduct Cases

The College may decide at its discretion to suspend a student respondent on an interim basis, that is, while an investigation is pending, in cases that fall within the definition of Non-Title IX Misconduct outlined above. The determination of whether to impose an interim suspension will be made by the Title IX Coordinator in consultation with other College officials as appropriate. A respondent may be suspended on an interim basis when the College has received information which indicates that the respondent's continued presence on campus will likely have a serious effect on the physical, mental, or emotional health, safety or well-being of another person, when physical safety is seriously threatened, or when the ability of the College to carry out its operations is threatened or impaired. The College may permit written challenges to such decisions at its discretion, through procedures determined by the College to be appropriate under the circumstances of a particular case.

Emergency Removal of Students or Employees in Title IX Sexual Harassment Cases

When the College determines that there is an immediate threat to the physical health or safety of any student or other individual arising from reported conduct that falls within the definition of Title IX Sexual Harassment stated in this policy, the College can remove a respondent from its education program or activity (which may include removing an employee respondent from their employment at the College, subject to any rights or procedures provided in any applicable collective bargaining agreement) and issue any necessary related no-trespass and no-contact orders. The College will make the decision to remove a respondent from its education program or activity based on an individualized assessment and risk analysis.

If the College makes such a decision, the respondent will be provided with notice and an opportunity to challenge the decision immediately following the removal. Specifically, the respondent shall have forty-eight hours in which to submit a letter to or appear personally or

virtually before an individual designated by the President to contest the emergency removal (though a meeting could be scheduled sooner if requested by the respondent, if practicable).

Administrative Leave in Title IX Sexual Harassment Cases

The College always maintains the discretion to place non-student employee respondents on paid administrative leave during the pendency of an investigation and resolution process as outlined below.

The College may also place a non-student employee respondent on unpaid administrative leave during the pendency of an investigation and resolution process.

The College may place student-employee respondents on administrative leave from their employment during the pendency of an investigation and resolution process where deemed appropriate as a supportive measure, under circumstances where it can do so without unreasonably burdening the student-employee respondent.

Formal Complaints of Sexual Harassment/Misconduct, Domestic Violence, Dating Violence, Stalking or Related Retaliation

Summary: Describes the process for filing a formal Title IX complaint, who may file, what triggers a formal investigation, and the rights and responsibilities of all parties once a complaint is filed.

A student or employee may file a formal complaint of Prohibited Conduct by a student or a third party by contacting the Title IX Coordinator (or in the case of a complaint against the Title IX Coordinator, by contacting the President of the College, who will designate an alternate contact person). A student or employee may file a formal complaint of Prohibited Conduct by an employee or a covered third party by contacting the Director of Human Resources (or in the case of a complaint against the Director of Human Resources, by contacting the President of the College, who will designate an alternate contact person). A student who is filing a complaint against an employee or covered third party may also seek assistance from the Title IX Coordinator, who will provide support to the student in making contact with the Director of Human Resources. Relevant contact information is provided above.

The College's procedures for handling formal complaints will be prompt, fair and impartial from the initial investigation to the final result, in that they will be:

- Completed within reasonably prompt time frames as designated in the College's policies, which time frames may be extended for good cause and/or due to extenuating circumstances, with written notice to the complainant and the respondent of the delay and the reason for the delay;
- Conducted in a manner that is consistent with the College's policies and transparent to the complainant and the respondent, including timely notice of meetings at which the complainant or respondent may be present, and providing the complainant, the respondent, and appropriate College officials timely and equal access to any information that will be used during the College's process in accordance with the policies herein; and
- Conducted by officials who do not have a conflict of interest or bias for or against complainants or respondents generally, or the individual complainant or respondent in

a particular case. If either party is concerned that an official involved in an investigation or adjudication may be biased or have a conflict of interest, the party should share their concerns with the Title IX Coordinator immediately. If their concern is about the Title IX Coordinator, the party should contact the President of the College.

A formal complaint under these procedures is a document filed by a complainant, signed personally or electronically by the complainant (or signed by the Title IX Coordinator under circumstances outlined below), and must request that the College investigate reported Prohibited Conduct. The formal complaint may be prepared by the complainant and submitted in writing to the Title IX Coordinator or may be written by the Title IX Coordinator based upon the complainant's verbal description of the alleged conduct, then submitted to the complainant for their review, editing and signature.

Determinations of Applicable Procedures, Dismissals, Transfers and Appeals of Such Determinations

When a complainant requests an investigation, the Title IX Coordinator will promptly upon receipt of a formal complaint:

1. determine whether the conduct alleged would, if proved, constitute Title IX Sexual Harassment (i.e., Quid Pro Quo Sexual Harassment, Severe, Pervasive and Objectively Offensive Sexual Harassment, Sexual Assault, or sex-based Domestic Violence, Dating Violence or Stalking) as defined in the Title IX Sexual Harassment definition stated above;
2. determine whether the conduct allegedly occurred in the College's education program or activity;
3. determine whether the conduct allegedly occurred in the United States; and
4. determine whether at the time the formal complaint was made, the complainant was participating or attempting to participate in a College program or activity.

If a formal complaint of conduct that would, if proved, satisfy all 4 of these elements and constitute Title IX Sexual Harassment as defined in this policy is filed by a complainant or signed by the Title IX Coordinator, it will be investigated and resolved through the procedures applicable to Title IX Sexual Harassment matters as outlined below.

The College will, as noted above, investigate alleged Title IX Sexual Harassment when a complainant submits a signed or electronically-submitted formal complaint to the Title IX Coordinator and requests an investigation. The Title IX Coordinator may also choose at their discretion to sign a formal complaint and initiate an investigation, even if the complainant chooses not to do so. In cases where the complainant does not wish to submit a formal complaint but the Title IX Coordinator decides in their discretion to sign a complaint and initiate an investigation and resolution process, the Title IX Coordinator will not be a complainant or otherwise a party to the matter.

If some but not all of the conduct alleged in the complaint satisfies all 4 of these elements and a formal complaint is received from a complainant or signed by the Title IX Coordinator, the College will address the entire matter through the procedures applicable to Title IX Sexual Harassment matters as outlined below (that is, it will as required by federal regulations to follow Title IX Sexual

Harassment procedures to address the alleged Title IX Sexual Harassment, and it will, to promote efficiency, choose to follow Title IX Sexual Harassment procedures to address Non-Title IX Misconduct and other non-Title IX alleged misconduct in such mixed cases, so that all related misconduct may be addressed through one investigation and resolution process).

If it appears based upon initial review or upon information gathered during an investigation that the matter does not satisfy and/or no longer satisfies all 4 of these elements, the College will, as required by the May 2020 Title IX regulations, dismiss the matter for purposes of the Title IX Sexual Harassment process, and will, to the extent deemed appropriate by the College, transfer it for handling under other College procedures. Investigation and resolution of a matter that does not fall within the definition of Title IX Sexual Harassment may be pursued, dismissed altogether, or transferred to another College process, as deemed appropriate in the College's discretion and/or as appropriate under applicable law.

Even if the initial allegations of a matter fall within the definition of Title IX Sexual Harassment, the College may (but is not required to) dismiss a formal complaint or any allegations therein if at any time during the investigation or resolution process:

- A complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein;
- The respondent is no longer enrolled at or employed by the College; or
- Specific circumstances prevent the College from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

If a formal complaint is dismissed by the College under the circumstances described above, the College will simultaneously provide to the parties written notice (by electronic or other means) of the dismissal and the reasons for the dismissal, and notice of the parties' opportunity to appeal such dismissal through the appeal procedures outlined below.

If the respondent is a student and an employee, the Title IX Coordinator will determine which procedures apply based upon the facts and circumstances, such as whether the respondent's status as a student or an employee predominates in the context of the Prohibited Conduct. If a student-employee is found to have engaged in Prohibited Conduct, the student-employee may be subject to sanctions both in connection with their employment, and in connection with their student status, as appropriate under these and other applicable procedures.

Notice in Title IX Sexual Harassment Cases

If the College initiates an investigation of reported Title IX Sexual Harassment, it will provide to the parties a written notice (by electronic or other means) that includes:

- Information about the College's formal and informal resolution processes;
- A statement of the allegations of behavior potentially constituting Prohibited Conduct, including sufficient details known at the time and with sufficient time to prepare a response before any initial post-intake interview. Sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting Prohibited Conduct, and the date and location of the alleged incident, if known;

- A statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process;
- Information regarding the College's presumption of good faith reporting and a summary of the College's false information policy;
- Notification that parties may have an advisor of their choice, who may be, but is not required to be, an attorney;
- Notification of existing counseling, health and mental health services available on campus and/or in the community;
- Notification that the parties may inspect and review evidence during the investigation and resolution process, as provided below; and Notification that taking any retaliatory action (directly or through others) against any person involved in the investigation is prohibited and will be considered a separate violation of College policy.

If in the course of an investigation the College decides to investigate allegations about any party that are not included in the notice described above, it will provide notice of the additional allegations to the parties whose identities are known.

Consolidation of Formal Complaints

The College may consolidate formal complaints as to allegations of Title IX Sexual Harassment and/or Non-Title IX Misconduct (in mixed cases as described above) against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of such Prohibited Conduct arise out of the same facts or circumstances. Where a grievance process involves more than one complainant or more than one respondent, references in this section to the singular "party," "complainant," or "respondent" include the plural, as applicable.

Investigations In Title IX Sexual Harassment Cases

Summary: Outlines the investigation process including evidence gathering, interviews with parties and witnesses, and the requirement that both parties have equal opportunity to review and respond to the evidence.

The Title IX Coordinator will appoint an investigator or investigators (referred to in the singular here for convenience). Investigators may be College employees or third party contractors, as determined at the College's discretion. The College will provide notice to the parties of the identities of the investigators. If a party believes that an investigator has a bias for or against complainants or respondents generally or for against a particular complainant or respondent, or has a conflict of interest, the party may within two (2) business days submit a written objection to the Title IX Coordinator that outlines the basis for their objection to the investigator's service. The Title IX Coordinator will make a decision on such objections, and will appoint any alternate investigator, and follow this process as necessary, until an investigator is selected to conduct the investigation.

If a respondent who has been notified of an investigation fails to cooperate with the investigator, the investigation may proceed, a finding may be reached, and a sanction may be imposed based on

the information available. In a case where a criminal investigation or criminal proceeding is underway regarding the same incident(s), the College may choose to delay its investigation for a reasonably short period while law enforcement officials are gathering evidence. During this period, the College may implement supportive measures to promote the safety and well-being of the parties and the College community while the law enforcement agency's fact-gathering is in progress. The College, after a reasonable period and communication with law enforcement, will initiate or resume, and complete its own investigation.

The College will endeavor to complete the investigation portion of the process within 90 days of issuing a notice of investigation as described above, but this may be extended at the College's discretion due to factors such as the complexity of the matter, the availability of witnesses, requests by law enforcement agency for a temporary delay in the investigation process (see below), College breaks, and other legitimate reasons.

Deadlines for parties' review of information and submission of comments may be extended upon request for good cause, at the discretion of the Title IX Coordinator or their designee.

The investigator will conduct an appropriate investigation which may include interviews with the complainant, the respondent, and other persons with information. These interviews may be audio-recorded. As required by the Clery Act, individuals conducting investigations and determination proceedings will receive training annually on the issues related to sexual assault, domestic violence, dating violence, and stalking, and how to conduct an investigation and/or determination process that protects the safety of complainants and promotes accountability.

To the extent permitted by law, the complainant and respondent will be afforded the same rights and opportunities throughout the investigation and adjudication process, including the opportunity to recommend witnesses and submit evidence. However, investigation logistics, including but not limited to the sequence of interviews, the decision to interview particular witnesses, and the decision to allow or consider evidence offered by the parties, are within the discretion of the investigator.

The complainant and respondent will be asked to identify, preserve, and submit all evidence pertaining to the matter under investigation, and to identify witnesses they believe may have relevant testimony to share. The investigator is not required to consider the evidence submitted or interview any particular witness, even if identified by one of the parties. However, in determining whether to interview witnesses or review evidence, the investigator should consider such factors as equity, fairness, thoroughness, and impartial treatment of both parties. All participants in the investigation are expected to cooperate fully by providing complete, accurate, and truthful information.

Complainants and respondents are entitled to the same opportunities to have an advisor of their choice present at any interviews, meetings, or proceedings that they are attending related to the investigation and adjudication process under this policy. The advisor may advise the complainant or respondent privately, but cannot act as a speaking advocate at a meeting. An investigator or other College representative may terminate meetings, and/or proceed with the investigation or adjudication based on otherwise-available information, if an advisor is disruptive or otherwise refuses to comply with the requirements of this policy.

While each party may have an advisor of choice, they may not compel any specific person to serve as their advisor. The College's faculty and/or staff may be available to serve as advisors, but none are required to do so.

An individual designated by the Title IX Coordinator will facilitate communications between the parties and the investigator.

Further, the following provisions will apply to Title IX Sexual Harassment Investigations:

- Parties' equal opportunity to present witnesses may include evidence from fact and expert witnesses; and
- Parties are not restricted in their ability to discuss the allegations under investigation or to gather and present relevant evidence; and
- Parties whose participation is invited or expected will receive written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate.

Preliminary Investigative Report in Title IX Sexual Harassment Cases

When the investigator has gathered all of the information that they determine should be gathered as an initial matter, the investigator will prepare a preliminary investigative report. The preliminary investigative report will summarize relevant evidence but will not contain any recommendations regarding whether the respondent violated this policy or any other College policy at issue.

Further, the following additional provisions will apply during the preliminary investigative report stage of the investigation:

- The College will provide each party with an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised, including the evidence upon which College does not intend to rely in reaching a determination regarding responsibility and/or which the investigator does not deem relevant, and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. Such evidence will not include un-redacted privileged records or information that may have been gathered or received during the investigation, absent written consent from the party holding the privilege.
- The College will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy.
- Parties and advisors are not permitted to download, print, or copy such evidence subject to inspection and review, and are not permitted to re-disclose such evidence without the College's permission. Parties and advisors will be required to sign an acknowledgment form indicating that they understand these prohibitions. Violations of these prohibitions may subject parties to College discipline under applicable conduct codes.

Review and Response to Preliminary Investigative Report in Title IX Sexual Harassment Cases

The complainant and the respondent will have an opportunity to review the preliminary investigative report and provide written responses to the report. The complainant and the respondent must submit any comments, feedback, additional documents, evidence, suggested questions for individuals interviewed, requests for additional investigation, names of additional witnesses, or any other information they deem relevant to the investigator, additional documents or other evidence, within 10 calendar days after the preliminary investigative report is sent or made available to them for review. The parties' written responses will be considered by the investigator prior to completion of the final investigative report, and some or all of the responses may be attached or otherwise incorporated into the final investigative report.

In the event that new, relevant information is provided or identified at this stage, the information will be incorporated into the preliminary report as deemed appropriate by the investigator.

Final Investigative Report in Title IX Sexual Harassment Cases

After considering any written response submitted by either party, or after the 10 calendar day comment period has lapsed without receiving a written response or responses, the investigator will address any relevant issues identified by the complainant and/or the respondent, and as appropriate, pursue any additional investigative steps as needed. The final investigative report will include the investigator's non-binding recommendation as to whether the respondent should be found responsible for violating the policy provisions at issue. The investigator's recommendation will be reached by applying the preponderance of evidence standard, i.e., whether it is more likely than not that the policy was violated. The final investigative report will be reviewed by the Title IX Coordinator before it is issued. Final investigative reports will be provided simultaneously to the parties and their advisors, if any. The College will give each party an opportunity to review the other party's written response, if any.

Further: :

- The final investigative report created by the investigator will fairly summarize relevant evidence and include as exhibits evidentiary materials as deemed appropriate by the investigator;
- At least 10 calendar days prior to the hearing referenced below, the College will send to each party and the party's advisor, if any, the final investigative report and exhibits in an electronic format or a hard copy, for their review and written response;
- Any written response a party wishes to provide must be submitted to the Title IX Coordinator or designee within 10 calendar days of receiving the final investigative report and exhibits; and
- The final investigative report and the parties' written responses, if any, will be provided to the hearing officer in advance of the hearing.

Hearings In Title IX Sexual Harassment Cases

Summary: Describes the live hearing process, the role of advisors, how questions are posed and responded to, and the rights of both parties throughout the hearing.

The procedures outlined immediately below in this section apply to cases that involve allegations that a student or employee respondent engaged in conduct that, if proved, would fall within the definition of Title IX Sexual Harassment.

Live hearings will be provided in Title IX Sexual Harassment matters, as required by the May 2020 Title IX regulations.

Hearing Officers

Hearings will be presided over by a hearing officer, who will make the decision by a preponderance of the evidence as to whether or not the respondent violated the policy provisions at issue. The hearing officer has broad authority to determine the process, timing and conduct of a hearing. For example, the hearing officer will determine the order of presentation, timing and overall duration of the hearing, what information and evidence will be heard, what information and questions are relevant to the determination of the matter, and what cross-examination questions will or will not be permitted.

Hearing officers will be appointed by the Title IX Coordinator. In selecting a hearing officer for a particular matter, the Title IX Coordinator will take care to select an individual who does not have a conflict of interest or bias for or against complainants or respondents generally or for or against an individual complainant or respondent. The College will notify the parties of the identity of the hearing officer in advance of the hearing, and parties may, within 3 calendar days of such notice, object to the service of the hearing officer by providing a written statement (which may be transmitted electronically) as to why the party believes that the hearing officer has a conflict of interest or bias. The Title IX Coordinator or designee will make decisions regarding such objections and the appointment of an alternate hearing officer, as necessary.

Advisors

Each party may have an advisor of their choice present at a hearing for the limited purpose of conducting cross-examination on behalf of that party. Advisors may be, but are not required to be, attorneys. If a party does not have an advisor of their choice present at a hearing, the College will without fee or charge to the party provide an advisor of the College's choice, again for the limited purpose of conducting cross-examination on behalf of that party. No later than 10 calendar days before the hearing, parties should inform the Title IX Coordinator of the identity of any advisor of choice who will accompany them to the hearing, so that the College will know whether or not it needs to arrange for the presence of a College-provided advisor.

At a time and manner deemed appropriate by the hearing officer, the advisor for each party will be permitted to ask the other party and any witnesses all relevant cross-examination questions and follow-up questions, including those challenging credibility. Except for that limited role, advisors may not participate actively in the hearing and may not speak or otherwise communicate on the part of the party that the advisor is advising. However, the advisor may consult privately in a non-disruptive manner with their advisee during and/or at a recess in the hearing. Scheduling accommodations generally will not be made for advisors if they unduly delay the process. The College reserves the right to take appropriate action regarding any advisor who disrupts the process, or who does not abide by the restrictions on their participation as determined in the sole

discretion of the hearing officer, which may include exclusion of the advisor from the hearing and the appointment of an alternate College-provided advisor.

Requests for Appearance of Witnesses

If a party wishes to have an individual appear at the hearing as a witness, they must provide notice of the identity of the proposed witness and a brief description of the subject matter of the witnesses' testimony to the Title IX Coordinator or designee at least 10 calendar days before the date of the hearing. The Title IX Coordinator or designee, in consultation with the hearing officer as necessary, will determine whether the witness is likely to have information that is relevant to the hearing, and if it is determined that the witness is likely to have relevant information, the Title IX Coordinator or designee will inform the witness that their presence at the hearing is required (to the extent that the College has jurisdiction to require the presence of the witness) or requested.

Conduct of Hearings and Relevance

At or before the hearing, the hearing officer will receive a copy of the final investigative report, any attachments thereto, and copies of the parties' written responses to the final investigative report, if any, which will be part of the information of record to be considered by the hearing officer. The recommendation regarding responsibility made by the investigator in the final investigative report is only advisory and is not binding on the hearing officer; the hearing officer will make an independent determination regarding responsibility based upon the investigative report, evidence admitted at the hearing, and the testimony and cross-examination of parties and witnesses at the hearing, as applicable.

Subject to the discretion of the hearing officer, hearings will ordinarily begin with introductory remarks by the hearing officer, followed by opening statements from any party who wishes to provide one, followed by the hearing officer's asking relevant initial questions of the parties as deemed appropriate by the hearing officer. During this portion of the hearing, advisors may confer privately and in a non-disruptive manner with their advisee, but they are not allowed to make opening statements or otherwise address the hearing officer or anyone else present at the hearing.

After the hearing officer has asked their initial questions of the parties, the hearing officer will permit each party's advisor to ask the other party all relevant questions and follow-up questions, including those challenging credibility.

Subject to the discretion of the hearing officer, questioning of witnesses will generally follow a similar process, whereby the hearing officer will pose relevant questions to each witness, then the parties' advisors will be permitted to ask relevant questions of witnesses.

In accordance with May 2020 Title IX regulations, such cross-examination by advisors will be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.

Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the hearing officer will first determine whether the question is relevant and explain any decision to exclude a question as not relevant. Advisors are not permitted to object to hearing officer decisions regarding relevance during a hearing.

Regarding the evidence subject to inspection and review that was provided to the parties and their advisors under the Title IX Sexual Harassment matter-specific investigation procedures outlined above, a copy of such evidence will be made available at the hearing, and each party and/or their advisor (as applicable) will have an equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.

Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

Information protected under a legally recognized privilege (such as, for example, privileged communications between a party and their physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in a treatment capacity, or privileged communications between a party and their attorney), is not relevant unless the person holding the privilege has waived the privilege.

At the request of either party, the College will provide for the hearing to occur with the parties located in separate rooms with technology enabling the hearing officer and parties to simultaneously see and hear the party or the witness answering questions. Live hearings may be conducted with all parties physically present in the same geographic location or, at the College's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants simultaneously to see and hear each other.

If a party or witness does not submit to cross-examination at the live hearing, the hearing officer will not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the hearing officer will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.

At the discretion of the hearing officer, parties (but not their advisors) will usually be given an opportunity to make a closing statement at the conclusion of the hearing.

Record of Hearings

The College will create an audio or audiovisual recording and/or transcript, of any live hearing, and will make it available to the parties for inspection and review.

Determinations Regarding Responsibility

In student respondent cases, within 14 days after the hearing, the hearing officer will prepare and issue a written determination regarding responsibility and, if applicable, any sanctions.

In employee respondent cases, within 14 days after the hearing, the hearing officer will prepare a decision regarding responsibility. If the hearing officer determines that the respondent is not responsible for violations of College policy, the hearing officer will issue a written determination as provided below. If the hearing officer determines that the respondent is responsible for violating College policy, the hearing officer and/or a separate sanctioning officer (as deemed appropriate by the College) will work together to produce a written determination regarding responsibility and any

sanctions. provide notice of that decision to the Director of Human Resources (or designee). In determining responsibility, the hearing officer will apply the preponderance of the evidence standard.

Written determinations will include:

- Identification of the section(s) of the College's Title IX Sexual Harassment policy alleged to have been violated;
- A description of the procedural steps taken from the receipt of the complaint through the determination, including but not limited to, as applicable, any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding the application of definitions of sexual harassment in the College's Title IX Sexual Harassment Policy to the facts;
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility and, where necessary and in collaboration with the sanctioning officer, a statement regarding any recommended sanctions and the rationale therefor; and
- Identification of the College's procedures and permissible bases for the complainant and respondent to appeal (as outlined below).

The determination regarding responsibility becomes final either on the date that the College provides the parties with the written determination of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which the appeal would no longer be considered timely.

The determination will also indicate whether remedies designed to restore or preserve equal access to the College's education program or activity will be provided by the College to the complainant, but will not provide details about any such remedies.

If sanctions are necessary, they will be assigned in accordance with the Sanctions section below. The parties will receive notice simultaneously of the written determination regarding responsibility and, if necessary, any sanctions as determined through the procedures outlined below.

Standard of Proof

Summary: States that the College uses a preponderance of the evidence standard — more likely than not — to determine whether a Title IX violation occurred.

Proceedings under this policy use the “preponderance of the evidence” or “more likely than not” standard of proof. This means that for a recommendation (by an investigator) or a finding (by a hearing officer) of responsibility to be made, it must be determined that there is more than a 50 percent likelihood that actions or behavior in violation of the policy at issue did occur.

Sanctions

Summary: Lists the range of consequences available following a finding of responsibility in a Title IX matter, from no-contact orders and probation to suspension or dismissal from the program.

Sanctions for violations of this Policy may include one or more of the following:

- Expulsion
- Suspension
- Written Reprimand or Warning
- Verbal Reprimand or Warning
- Separation from employment and/or student-employment
- Disciplinary Probation
- Employee or Faculty Probation
- Nonrenewal of contract
- Referral to another College employment-related process for the determination of employment-status-related sanctions
- Revocation of honors, awards, or degrees
- Restricted access to College facilities or activities, including student organizations or athletic or intramural participation
- Community Service
- Issuance of a “No Trespass” or “No Contact” Order
- Removal from student housing

In addition, the College may determine that additional remedies are warranted, such as education or training for some or all members of the College community.

In cases where a student is found responsible for Prohibited Conduct as defined above, sanctions will be determined by the hearing officer.

In cases where a faculty member or staff member is found responsible for Prohibited Conduct as defined above, sanctions (which may include referral to a separate process for the determination of employment-status-related sanctions, as appropriate), will be determined by a College administrator appointed by the President.

If applicable, the sanctioning officer will determine sanctions after receiving notice from the hearing officer that a determination of responsibility has been made in a particular case, and based upon a review of file documents and other case-related resources as deemed appropriate at the discretion of the sanctioning officer. The sanctioning officer and the hearing officer will collaborate to produce one written determination, which will provide notice to the parties of findings regarding responsibility, resulting sanctions, and the rationale therefor, along with the other information listed in the written determination description section above. Written determinations regarding responsibility and sanctions will be communicated to the parties simultaneously.

Disposition Without a Determination/Dean's Sanction

In cases where the facts are not in dispute, and a student respondent is prepared to accept responsibility for their actions, the College may, once it has determined that the student respondent understands fully but has decided not to take advantage of the rights provided by the procedures described above, offer the option of Disposition Without a Determination, which is also

called a Dean's Sanction. For a full description of the Dean's Sanction process, please see the "Disciplinary Sanctions" section of the Student Code of Conduct and Policies.

Appeal Procedure in Title IX Sexual Harassment Cases

Summary: Explains the grounds on which either party may appeal a Title IX determination, the timeline for filing, and the process by which appeals are reviewed and decided.

Each party to a case falling under this policy has a right to appeal the Title IX Coordinator's dismissal of a formal complaint for Title IX purposes or a determination regarding responsibility on the following grounds:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and/or
- The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Within seven (7) calendar days of the date on which the written determination regarding responsibility and, if applicable, sanctions, is transmitted to the parties, either the complainant or respondent may appeal the decision to an appeals officer. The appeals officer is the President of the College. Appeals are initiated by the appealing party's delivery of a statement of appeal to the Title IX Coordinator, who will forward the statement of appeal to the appeals officer. The other party may be notified of any submitted appeal through the Title IX Coordinator or their designee. The other party may submit a written response to the appeal within 5 working days of delivery of the appealing party's appeal. Both parties will be informed of any change to the results of a disciplinary process that occurs prior to the time that such results become final, and when such results become final. The decision of the appeals officer is final.

Informal Resolution in Title IX Sexual Harassment Cases

Summary: Describes the voluntary informal resolution process available in some Title IX cases, the conditions under which it may be used, and the protections in place for both parties.

Informal resolution is a voluntary resolution option that does not involve formal hearing-based resolution procedures. Informal resolution may be used in Title IX Sexual Harassment matters in which a formal complaint has been filed by a complainant or signed by the Title IX Coordinator.

At any time prior to reaching a determination regarding responsibility, the College may facilitate an informal resolution process (e.g., mediation or restorative justice) where requested by a party and agreed to by both parties. If a party requests the initiation of an informal resolution process and the Title IX Coordinator agrees that the matter is appropriate for informal resolution, the College will provide to each party a written notice that discloses:

- The allegations;
- The requirements of the informal resolution process including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations-

- As noted below, the College generally permits parties to withdraw from the informal resolution process and initiate or re-initiate a formal investigation and hearing process at any time before the informal resolution process is completed and any informal resolution is agreed to in writing by the parties); and
- Any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared (for example, statements made by parties in the course of an informal resolution process will not be considered by the College in any subsequent formal resolution process in the event that the matter is not resolved through the informal resolution process.

All parties and the Title IX Coordinator must agree to informal resolution for this option to be used. The Title IX Coordinator will assess the request for informal resolution in light of factors such as, but not limited to, the severity of the alleged violation and the potential risks to campus community members posed by the reported misconduct. The College will only proceed with an informal resolution process if both parties provide their voluntary, written consent to having the matter resolved through the informal resolution process.

The matter will be deemed resolved if and when the parties expressly agree in writing to an outcome that is acceptable to them and which is approved by the Title IX Coordinator (in consultation with other College administrators as deemed necessary). A party may withdraw from the informal resolution process at any time prior to their execution of a written informal resolution agreement. After an informal resolution is agreed to in writing between the parties, neither party may initiate a formal resolution process regarding the same factual allegations.

At any time before a matter is resolved through informal resolution, the Title IX Coordinator may terminate an informal resolution process and initiate or re-initiate a formal investigation and resolution process at any time, as they deem appropriate in their discretion.

The College will not offer to facilitate an informal resolution process in any matter that involves allegations that an employee sexually harassed a student.

Educational Programming

Summary: States the College's commitment to ongoing education and training on sexual misconduct prevention, bystander intervention, and healthy relationships for students and staff.

The College will provide educational programming for students and employees addressing the issues of domestic violence, dating violence, sexual assault, and stalking, which will include: 1) primary prevention and awareness programs for all incoming students and new employees; 2) safe and positive options for bystander intervention; 3) information on risk reduction to recognize warning signs of abusive behavior; 4) ongoing prevention and awareness programs for students, faculty and staff who have responsibility for working with students.

Glossary of Policies

Policy / Section	Summary
Welcome to the High School Program	Introduces the program's purpose, values, and what students can expect from three weeks of immersive college life at Landmark College.
Overview & Purpose of the Program	Describes the program as a genuine early college experience designed for neurodiverse learners, where students attend real courses, live on campus, and develop independence in a community built for them.
How to Use This Handbook	Guides students and families through the handbook's structure, explains where to find key information, and encourages students to ask staff when anything is unclear.
Your Commitment to This Community	States that enrollment in the program constitutes the student's agreement to abide by all handbook policies, and that the College will act consistently with its mission in situations not explicitly covered.
Understanding the Difference Between Safety and Discomfort	Distinguishes between genuine safety concerns — which must be reported — and the discomfort of growth, which is expected, normal, and supported but not a reason to disengage from the program.
Addenda & Changes Between Publications	Explains that the College may update handbook policies between annual publications and will notify students and families of any substantive changes, which supersede prior versions.
Student Rights & Responsibilities	Establishes the fundamental rights every HSSP student is entitled to and the corresponding responsibilities each student holds toward the community, grounded in the RUSH values.
Student Rights	Outlines eleven specific rights students hold in this program, including protection from discrimination, access to support, academic fairness, privacy, and the right to a fair process if something goes wrong.
Student Responsibilities	Describes ten community responsibilities students are expected to uphold, including respectful conduct, honest communication, protecting peers' privacy, and engaging with accountability when addressed.

Policy / Section	Summary
Student Protections	Groups all civil rights, legal protections, and compliance policies that govern how the College treats students and protects their identity, privacy, and equal access to the program.
Vermont Mandatory Reporting Policy	Explains that all HSSP staff are mandated reporters under Vermont law, what they are required to report, the limits of confidentiality, and how students can report concerns about their own or a peer's safety.
Access to Records (FERPA)	Explains that because most HSSP students are under 18, FERPA rights belong to their parents or legal guardians, who may access education records, and describes what records are and are not accessible.
Notice of Non-Discrimination	States that Landmark College does not discriminate on the basis of sex, disability, race, religion, sexual orientation, gender identity, or any other protected characteristic in any aspect of program administration.
Anti-Harassment Policy	Prohibits harassment of any student, staff member, or community member and establishes the College's commitment to investigating and addressing all reported incidents promptly and equitably.
Bias Incident Response	Defines bias incidents, explains how students can report them, and describes the College's response process, which may include restorative practices, education, and formal disciplinary action.
Accommodations Policy and Procedures	Describes how students with disabilities may request formal ADA/504 accommodations, what documentation may be required, and how the College evaluates and implements approved accommodations.
Sexual Harassment, Sexual Misconduct, Domestic Violence, Dating Violence, and Stalking Policy (Title IX)	Defines prohibited sexual misconduct, explains reporting options, describes the formal complaint and investigation process, and outlines protections available to all parties including minor students.
Student Chosen Names and Pronouns	Affirms the College's commitment to using students' chosen names and correct pronouns in all program interactions and explains how students may communicate their preferences to staff.

Policy / Section	Summary
Privacy & Dignity	Establishes students' right to privacy in their personal information, living spaces, and identity, and prohibits any conduct that violates the dignity of another community member.
Health, Wellness, and Safety	Covers all policies related to students' physical and mental health, emergency response, substance use, and physical safety during the residential program.
Mental Health Support & Crisis Response	Describes when and how to seek mental health support, what to do if a peer is in distress, how to respond in a mental health emergency, and what happens after a student asks for help.
Student Safety or Threat of Harm to Others	Outlines the College's administrative response when a student poses a potential threat to their own safety or the safety of others, including interim measures and notification procedures.
Immunization Policy for High School Program Participants	States immunization requirements for participation in the residential program and explains how families must document compliance before the program begins.
Prescription Medication	Requires all medications to be pre-packaged by a licensed pharmacy in labeled multi-dose pouches, turned into Health Services at registration, and dispensed daily by nursing staff throughout the program.
Alcohol & Other Drug Policies	Prohibits the possession, use, or distribution of alcohol, cannabis, and other unauthorized substances, and describes consequences for violations, including mandatory reporting obligations for minor students.
Weapons	Prohibits the possession of weapons of any kind on campus or in residence halls and describes the College's response to violations, including removal from the program and referral to law enforcement.
Fighting & Violence	Prohibits physical violence, threats of violence, and intimidation in any form, and establishes that any incident involving physical altercation will result in immediate disciplinary action.
Community Standards & Conduct	Establishes the behavioral expectations that govern students' academic, social, online, and residential conduct, grounded in the RUSH values and the goal of a respectful shared community.

Policy / Section	Summary
Standards of Conduct	Introduces the RUSH values framework — Respect, Understanding, Safety, and Honesty — as the foundation for all community expectations and the lens through which conduct decisions are made.
Community Living Expectations	Provides explicit day-to-day behavioral expectations for dining, hallways, shared spaces, roommate relationships, free time, and transitions between activities, written with neurodiverse learners in mind.
Social Media and Online Conduct Policy	Requires that online conduct meet the same standards as in-person conduct, addresses photography consent, prohibits cyberbullying and peer harassment, and protects students' disability and personal information online.
Policy on Relationships and Public Displays of Affection	Establishes expectations for respectful interpersonal relationships among students and defines appropriate conduct in shared and public spaces on campus.
Anti-Hazing Policy	Prohibits all forms of hazing in connection with any program activity or group, defines hazing broadly, and establishes reporting procedures and sanctions consistent with Vermont law and federal requirements.
Anti-Bullying Policy	Prohibits repeated harmful conduct intended to intimidate, exclude, or demean any student, and establishes procedures for reporting and responding to bullying in all its forms.
Recording Policy	Governs the recording of conversations, classes, and interactions, requires consent of all parties in accordance with applicable law, and prohibits recordings made without authorization.
Dress Code	Establishes basic expectations for appropriate attire in academic, dining, and common spaces, with the goal of maintaining a respectful community environment rather than prescribing specific clothing.
Academic Program Policies	Governs student conduct and expectations within the academic program, including attendance, classroom behavior, academic integrity, and other policies specific to the learning environment.
Attendance	Requires students to attend all scheduled classes and academic activities, establishes the process for reporting absences, and

Policy / Section	Summary
Classroom Behavior	describes consequences for unexcused absences during the program.
	Establishes expectations for respectful, engaged participation in class, explicitly acknowledges neurodivergent behavioral variation as normal, and outlines how disruptions will be addressed.
Academic Integrity	Defines cheating, plagiarism, fabrication, and unauthorized AI use, requires students to submit their own original work, and establishes the consequences for academic dishonesty during the program.
Other Policies that Apply to Time in Class	Covers additional expectations during academic time, including mobile phone use, recording of class sessions, and conduct expectations specific to the instructional environment.
Residential Life Policies	Governs all aspects of living on campus during the program, including room use, quiet hours, curfew, safety, guests, and the expectations that make shared residential life function well.
Living in the Residence Halls	Introduces the residential experience as a central part of the program and describes the general expectations, values, and shared responsibilities that apply to all students living on campus.
Community Living Expectations	Describes the specific behavioral norms that apply in residential spaces, including hallways, bathrooms, lounges, and common areas, with attention to noise, cleanliness, and mutual respect.
Room Use & Occupancy	Establishes who may occupy residential rooms, how rooms may be used, and what conduct or uses of residential space are prohibited during the program.
Room Changes	Describes the process for requesting a room change, explains that requests are accommodated when possible based on availability, and identifies who to contact to initiate the process.
Damage Assessment	States that students are financially responsible for damage to their room or College property beyond normal wear and tear, and describes the assessment process at the end of the program.
Quiet Hours and Courtesy Hours	Specifies Quiet Hours Sunday through Thursday from 10:00 PM and Friday through Saturday from 11:00 PM, and establishes

Policy / Section	Summary
Curfew	Courtesy Hours expectations for respectful noise levels at all other times.
	Requires students to be in the residence hall by 10:00 PM, on their residential wing by 10:30 PM, and in their own room by 11:00 PM, seven days a week for the duration of the program.
Residence Hall Safety & Security	Describes the security measures in place in the residence halls, student responsibilities for building security, and procedures for reporting safety concerns or unauthorized individuals.
Identification Cards	Requires students to carry their Landmark College ID at all times, explains how IDs are used for building access and program services, and describes the replacement process if an ID is lost.
Room Keys	States that students are responsible for their room key, prohibits duplication or transfer of keys, and describes the fees and procedures associated with lost or damaged keys.
Locking Doors and Windows	Requires students to lock their room door and close windows when leaving their room and overnight, as a basic safety measure for themselves and their neighbors.
Room Inspections	Explains when and how staff may conduct routine room inspections to ensure health, safety, and compliance with residential policies, with notice provided when practicable.
Room, Automobile, and Personal Effects Searches	Describes the circumstances under which the College may conduct a search of a student's room, belongings, or vehicle, including situations involving health, safety, or suspected policy violations.
Personal Property Liability	States that the College is not responsible for the loss, theft, or damage of students' personal property, and encourages students to leave valuables at home or secure them appropriately.
Fire Safety	Prohibits items that pose a fire risk in residential spaces, including candles, hot plates, and certain appliances, and establishes students' responsibility to follow all fire safety protocols.
Fire Drills and Building Evacuation	Requires all students to evacuate immediately when a fire alarm sounds, describes assembly locations and procedures, and establishes that failure to evacuate is a serious conduct violation.

Policy / Section	Summary
Guests	Limits guests in residential rooms to other HSSP students with roommate consent, prohibits college-program students from residential floors, and describes staff oversight of all guest interactions.
Visitor Policy	Defines authorized visitors as parents or pre-approved individuals, requires all visitors to check in with Campus Safety, establishes visiting hours, and prohibits unauthorized individuals from campus access.
Dining Services	Describes meal service arrangements for HSSP students, including designated dining periods, expectations for conduct in the dining hall, and how dietary needs or restrictions are accommodated.
Food Delivery and Outside Deliveries	Prohibits food delivery services such as DoorDash to campus, permits deliveries for genuine necessities only with staff approval, and requires all packages to be received through Campus Safety.
Mail & Packages	Explains how students receive mail and packages during the program, describes pickup procedures through the campus mailroom, and states that students are responsible for retrieving their own items.
Campus Policies & Operations	Covers policies governing students' movement, technology use, and conduct across the broader campus, including shared spaces with college-program students and other members of the Landmark community.
Guidelines for Campus Access and Shared Spaces	Defines approved campus areas for HSSP students, establishes expectations for behavior in spaces shared with college-program students, and describes what to do if a student feels unsafe on campus.
Permission to Leave Campus	Requires written parent or guardian authorization for any student to leave campus, describes the sign-out procedure, and establishes that students may not leave campus independently without approval.
Computer and Network Acceptable Use Policy	Governs students' use of College technology resources and networks, prohibits misuse, illegal activity, and harassment through College systems, and states consequences for policy violations.

Policy / Section	Summary
Mobile Phones	Frames phone use as a life skill, establishes expectations for phone use in academic and residential settings, and describes an escalating staff response for students who cannot manage phone use appropriately.
Video Surveillance Cameras	Notifies students that campus common areas and building entrances are monitored by video surveillance for safety and security purposes, and that footage may be reviewed in connection with conduct matters.
Automobiles	States that HSSP students may not bring personal vehicles to campus and establishes that any vehicles present must be registered with Campus Safety and used in accordance with College policy.
Compliance with College and Program Officials	Requires students to comply with reasonable directives from any College employee, Campus Safety officer, or program staff member, and establishes non-compliance itself as a conduct violation.
Formal Processes	Describes the structured procedures the College uses to address grievances, conduct violations, and disciplinary matters, ensuring all students receive fair, consistent, and transparent treatment.
Grievance Process	Provides a formal pathway for students or families to raise concerns about unfair treatment or policy misapplication, with escalation options and explicit non-retaliation protections for all who participate.
Conduct Process & Disciplinary Procedures	Describes how the College investigates and resolves conduct violations, including the student's right to share their account, the role of the Program Director, and the range of possible outcomes.
General Sanctions	Lists the range of consequences available to the College in response to conduct violations, from educational conversations and probation to suspension and dismissal, scaled to the severity of the conduct.
Community Standards Conferences	Describes the meeting-based process through which conduct matters are typically resolved, including who participates, how the student's account is heard, and how outcomes are communicated.

Policy / Section	Summary
Interim Actions	Explains that the College may take immediate protective action — including temporary removal from program activities — before a formal conduct process is complete, when safety requires it.
Culpability	Addresses how the College considers a student's level of responsibility in a conduct matter, including circumstances such as voluntary intoxication, mental health status, and coercion by others.
Appendix A – Accommodations Policy and Procedures	Provides the full legal and procedural framework governing disability accommodations at Landmark College, including student rights, documentation requirements, and appeal procedures under the ADA and Section 504.
Accommodations Policy Statement	States the College's legal obligation and institutional commitment to providing equal access to qualified students with disabilities through reasonable accommodations, auxiliary aids, and services.
Admission for Students with Disabilities	Clarifies that disability status is not a factor in admission decisions and that accommodation needs are addressed separately through the College's accommodation process after enrollment.
Confidentiality of Disability-Related Information	Explains how the College protects students' disability-related information, who may access it and under what circumstances, and students' rights regarding disclosure of their diagnoses or documentation.
Accessibility of Campus Events and Programs	States that all College-sponsored events and programs must be accessible to students with disabilities and describes how students may request accessibility support for specific activities.
Section 504 Coordinator	Identifies the College's Section 504 Coordinator, explains their role in overseeing compliance and handling accommodation-related concerns, and provides contact information for students and families.
ADA Coordinators	Identifies the College's ADA Coordinators for students, employees, and facilities, explains their respective responsibilities, and provides contact information for raising accessibility concerns.

Policy / Section	Summary
Student Accommodation Procedures	Describes the step-by-step process for requesting accommodations, including how to submit documentation, meet with the accommodation office, and receive a formal accommodation determination.
Appeal Procedures	Explains how students may appeal an accommodation decision they believe is incorrect or insufficient, including the timeline, who reviews the appeal, and what outcomes are possible.
Complaints Regarding Disability-related Harassment and Discrimination	Provides the process for reporting harassment or discrimination based on disability, identifies who handles such complaints, and describes available external complaint pathways including the OCR.
Assistance for Students with Temporary Impairments	Explains that students with temporary conditions such as injuries or short-term illness may request temporary adjustments, which are handled separately from formal ADA accommodation processes.
Service & Emotional Support Animals	Distinguishes between service animals and emotional support animals, describes the College's policies for each in campus and residential settings, and explains the approval process for ESAs.
Digital Accessibility Policy	States the College's commitment to ensuring all digital content, platforms, and technology used in the program are accessible to students with disabilities in accordance with applicable standards.
Appendix B: Title IX Policy	Contains the full legal procedures governing sexual harassment, sexual misconduct, domestic violence, dating violence, and stalking, including rights of all parties and the formal investigation and hearing process.
Notice of Nondiscrimination on the Basis of Sex	States the College's legal obligation under Title IX not to discriminate on the basis of sex and identifies the Title IX Coordinator as the designated contact for related concerns.
Scope of Policy	Defines which conduct, individuals, and locations fall within the coverage of the Title IX policy, including conduct occurring off campus when it affects a student's access to the program.
Title IX Coordinator	Identifies the College's Title IX Coordinator, describes their responsibilities for overseeing compliance and managing reports, and provides contact information for students and staff.

Policy / Section	Summary
General Definitions	Defines key terms used throughout the Title IX policy, including complainant, respondent, sexual harassment, consent, and other legally significant concepts.
Prohibited Conduct	Lists all forms of conduct prohibited under the Title IX policy, including sexual harassment, sexual assault, stalking, dating violence, domestic violence, and retaliation.
Coordination with Other Policies	Explains how the Title IX policy interacts with other College policies and with Vermont mandatory reporting law, and how overlapping obligations are handled simultaneously.
Separate Handling of Other Policy Violations by Reporting Students	States that the College will not use information disclosed in a Title IX report to bring unrelated conduct charges against the reporting student, subject to limited exceptions for serious safety concerns.
Confidentiality	Describes the limits of confidentiality in Title IX proceedings, identifies truly confidential resources, and explains what information must be disclosed to the Title IX Coordinator and when.
Community Assistance and Resources for Victims	Lists campus and community support resources available to students affected by sexual misconduct, dating violence, domestic violence, or stalking, including counseling, health services, and advocacy.
Reporting and Initial Considerations	Explains all available reporting options, describes what happens immediately after a report is received, and outlines the supportive measures available to complainants regardless of whether a formal complaint is filed.
Formal Complaints	Describes the process for filing a formal Title IX complaint, who may file, what triggers a formal investigation, and the rights and responsibilities of all parties once a complaint is filed.
Investigations in Title IX Sexual Harassment Cases	Outlines the investigation process including evidence gathering, interviews with parties and witnesses, and the requirement that both parties have equal opportunity to review and respond to the evidence.
Hearings in Title IX Sexual Harassment Cases	Describes the live hearing process, the role of advisors, how questions are posed and responded to, and the rights of both parties throughout the hearing.

Policy / Section	Summary
Standard of Proof	States that the College uses a preponderance of the evidence standard — more likely than not — to determine whether a Title IX violation occurred.
Sanctions	Lists the range of consequences available following a finding of responsibility in a Title IX matter, from no-contact orders and probation to suspension or dismissal from the program.
Appeal Procedure in Title IX Sexual Harassment Cases	Explains the grounds on which either party may appeal a Title IX determination, the timeline for filing, and the process by which appeals are reviewed and decided.
Informal Resolution in Title IX Sexual Harassment Cases	Describes the voluntary informal resolution process available in some Title IX cases, the conditions under which it may be used, and the protections in place for both parties.
Educational Programming	States the College's commitment to ongoing education and training on sexual misconduct prevention, bystander intervention, and healthy relationships for students and staff.