

**PROHIBITION OF DISCRIMINATION, SEXUAL AND OTHER UNLAWFUL
HARASSMENT OF EMPLOYEES, NON-EMPLOYEES AND INTERNS**

WHEREAS the Board of Cooperative Educational Services of Rensselaer, Columbia and Greene Counties (the "Board") is committed to safeguarding the well-being of all its employees and interns, to fostering the efficient and effective provision of services to all BOCES constituencies and stakeholders, and to acting in the spirit of its Mission Statement and Strategic Plan by excluding from all BOCES work environments, to the fullest extent possible, any form of discrimination, sexual harassment and other unlawful harassment;

NOW, THEREFORE, BE IT RESOLVED that the Board adopt the following policy:

**DISCRIMINATION, SEXUAL HARASSMENT AND OTHER UNLAWFUL
HARASSMENT OF EMPLOYEES, NON-EMPLOYEES AND INTERNS**

The Board is committed to safeguarding the right of all employees, certain non-employees and interns to work in an environment that is free from all forms of sexual harassment, including but not limited to any act of sexual violence. The Board recognizes that sexual harassment depends not only on the offender's intention but also upon how the person who is the target of the alleged harassment perceives the behavior or is offended by it. The Board further recognizes that sexual harassment can be committed by a person of either sex against a person of either the opposite sex or the same sex, and by peers as well as supervisors, students, and vendors.

The Board therefore condemns and prohibits all unwelcome behavior of a sexual nature that is directed at an employee or intern and also behavior that has the purpose or effect of creating an intimidating, hostile or offensive working environment for employees and interns. Sexual harassment is considered a form of employee misconduct. Sanctions will be enforced against individuals engaging in sexual harassment and against supervisory and managerial personnel who knowingly allow such behavior to continue.

The Board also prohibits sexual harassment of non-employees in a Questar III workplace when Questar III supervisors or officers knew or should have known that the non-employee was subjected to sexual harassment in a Questar III workplace and failed to take immediate and appropriate corrective action. In cases involving non-employees, the extent of Questar III's control or other legal responsibility Questar III has with respect to the conduct of the harasser shall be considered.

The Board is also committed to safeguarding the right of all employees and interns to work in an environment that is free from all other unlawful harassment on the basis of race, color, national origin, sex, disability, age, religion, creed, sexual orientation, military status, predisposing genetic characteristics, marital status, domestic violence victim status, or other characteristic protected by federal or state law (collectively, the "protected characteristics").

The Board does not discriminate against employees or interns on the basis protected characteristics in its programs and activities, including but not limited to recruitment and

appointment of employees, employee pay and benefits, and other terms and conditions of employment. The Board strictly prohibits discrimination against employees and interns on the basis of any protected characteristic.

The following persons at Questar III have been designated to handle inquiries regarding this policy and the complaints of discrimination, sexual harassment or other unlawful harassment on the basis of any protected characteristic: the Director of Human Resources, or any other designated Compliance Officer. The Director of Human Resources may be contacted at: Questar III Administrative Offices, 10 Empire State Blvd., Castleton, NY. Other designated Compliance Officers, and their contact information, is as follows: Questar III School Attorney, Questar III Administrative Offices, 10 Empire State Blvd., Castleton, NY. The phone number for the Questar III Administrative Offices is 518-477-8771. Inquiries and complaints also may be submitted by email to: compliance@questar.org.

The District Superintendent shall develop or cause to be developed and implement specific procedures on reporting, investigating and remedying allegations of discrimination, sexual harassment or other unlawful harassment on the basis of any prohibited characteristic. Appropriate corrective action shall be taken promptly, up to and including discharge of the offender, if an employee. Appropriate disciplinary action shall be taken promptly, if a student. In the absence of a victim's complaint, Questar III shall, upon either learning of or having reason to suspect the occurrence of discrimination, sexual harassment or other unlawful harassment on the basis of any protected characteristic ensure that an investigation is commenced immediately by appropriate individuals.

Such procedures shall be consistent with any applicable provisions contained in the BOCES' collective bargaining agreements and with the tenure or civil service laws of the State of New York.

A copy of this policy and whatever regulations are developed to ensure its implementation shall be distributed to all employees and interns of the BOCES, and shall also be posted on the BOCES website and in appropriate places.

References

Education Amendments of 1972, Title IX, 20 U.S.C. §1681 *et seq.*
Title VII of Civil Rights Act (1964), 42 U.S.C. §2000-e; 34 CFR §100 *et seq.*
Executive Law §296-d (prohibition of sexual harassment of non-employees)
Labor Law §201-g (required sexual harassment policy and training)
Civil Practice Law and Rules §§5003-b (nondisclosure agreements optional); 7515 (mandatory arbitration prohibited)
General Obligations Law §5-336 (nondisclosure agreements optional)
Davis v. Monroe County Board of Education, 526 U.S. 629, 652 (1999)
Gebser v. Lago Vista Independent School District, 524 U.S. 274 (1998)

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Faragher v. City of Boca Raton, 524 U.S. 775 (1998)

Burlington Industries v. Ellerth, 524 U.S. 742 (1998)

Oncale v. Sundowner Offshore Services, Inc., 523 U.S. 75 (1998)

Franklin v. Gwinnett County Public Schools, 503 U.S. 60 (1992)

Meritor Savings Bank, FSB v. Vinson, 477 U.S. 57 (1986)

Office for Civil Rights *Revised Sexual Harassment Guidance (January 19, 2001)*

Office for Civil Rights, *Dear Colleague Letter: Sexual Harassment Issues (2006)*

Office for Civil Rights, *Dear Colleague Letter: Bullying (October 26, 2010)*

ADOPTED 3/7/94

REVISED: 11/13/14

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REVISED: 10/18/18

**DISCRIMINATION, SEXUAL HARASSMENT AND OTHER UNLAWFUL
HARASSMENT COMPLAINT PROCEDURE
FOR EMPLOYEES, NON-EMPLOYEES AND INTERNS
ADMINISTRATIVE REGULATION**

The Board of Education has adopted a policy prohibiting discrimination, sexual harassment and other unlawful harassment of employees and interns of Questar III (No. 5-114) and has directed the District Superintendent to establish procedures to address complaints of such discrimination and harassment. This policy also prohibits sexual harassment of non-employees in a Questar III workplace. These regulations establish such procedures for filing complaints. All employees and interns are encouraged to pursue questions and complaints regarding discrimination, sexual harassment and other unlawful harassment.

I. Responsibilities of All Employees and Interns

- A. Questar III is committed to maintaining environments free of discrimination, sexual harassment and other unlawful harassment (“unlawful harassment”). Questar III employees and interns are expected to engage themselves in a professional manner and to avoid all conduct that could be perceived by a reasonable person to create, bolster or perpetuate a hostile workplace or education environment.
- B. Supervisory personnel who know that discrimination, harassment or retaliation is occurring, or who receive information that such might be occurring, are required to immediately contact the Questar III Director of Human Resources, or other designated Compliance Officer (identified below) to discuss appropriate and immediate action.

II. Making and Resolving Complaints

A. Definitions -

- 1. *Complainant* shall mean an employee or intern who alleges that he or she has been harassed on the basis of any protected characteristic. *Complainant* also shall mean a non-employee who alleges that he or she has been sexually harassed.
- 2. *Complaint* shall mean any alleged violation of Questar III’s policies prohibiting discrimination, sexual harassment or other unlawful harassment.
- 3. *Compliance Officer* shall mean the Director of Human Resources, or School Attorney or other designated Compliance Officer.
- 4. *Hostile Environment* shall mean a work environment which is both subjectively and objectively perceived as abusive, intimidating, or threatening, as a result of sexual or other unlawful harassment. Relevant considerations include the frequency or severity of the conduct or communications, whether or not

- physical contact has occurred and the relationship of the alleged victim and harasser. An isolated incident, unless extremely severe, usually will not give rise to a hostile environment.
5. *Protected Characteristic* shall mean race, color, national origin, sex, disability, age, religion, creed, sexual orientation, military status, predisposing genetic characteristics, marital status, domestic violence victim status, or other characteristic protected by federal or state law.
 6. *Representative* shall mean any person, other than an attorney, designated by the complainant or the alleged perpetrator to act on her/his behalf.
 7. *Sexual Harassment* includes harassment on the basis of actual or perceived or self-identified sex, sexual orientation, gender identity, gender expression, gender stereotypes, and transgender status. Sexual harassment shall mean any act of sexual violence, and any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:
 - a. submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of an employee's employment or an intern's participation in an internship; or
 - b. submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting an employee's employment or an intern's participation in an internship program; or
 - c. the conduct or communication has the purpose or effect of substantially or unreasonably interfering with an employee's, intern's or non-employee's work performance, or creating an intimidating, hostile or offensive working environment.
 8. *School-related conduct that is unacceptable* and which may constitute sexual harassment includes but is not limited to the following:
 - a. rape, attempted rape, sexual assault, attempted sexual assault, forcible sexual abuse, hazing, and other sexual and gender-based activity of a criminal nature as defined under the State Penal Law;
 - b. unwelcome sexual advances or invitations or requests for sexual activity, including but not limited to those in exchange for promotions, preferences, favors, selection for extracurricular activities or job assignments, or when accompanied by implied or overt threats concerning the target's work evaluations, other benefits or detriments;
 - c. unwelcome and/or offensive public sexual display of affection, including kissing, hugging, making out, groping, fondling, petting, inappropriate

touching of one's self or others (e.g., pinching, patting, grabbing, poking), sexually suggestive dancing, and massages;

- d. any unwelcome communication that is sexually suggestive, sexually degrading or derogatory or implies sexual motives or intentions, such as sexual remarks or innuendoes about an individual's clothing, appearance or activities; sexual jokes; sexual gestures; public conversations about sexual activities or exploits; sexual rumors and "ratings lists;" howling, catcalls, and whistles; sexually graphic computer files, messages or games, etc;
- e. unwelcome and offensive name calling or profanity that is sexually suggestive or explicit, sexually degrading or derogatory, implies sexual intentions, or that is based on sexual stereotypes or sexual orientation, gender identity or expression;
- f. unwelcome physical contact or closeness that is sexually suggestive, sexually degrading or derogatory, or sexually intimidating such as the unwelcome touching of another's body parts, cornering or blocking an individual, standing too close, spanking, pinching, following, stalking, frontal body hugs, etc.;
- g. unwelcome and sexually offensive physical pranks or touching of an individual's clothing, such as hazing and initiation, "streaking," "mooning," "snuggies" or "wedgies" (pulling underwear up at the waist so it goes in between the buttocks), bra-snapping, skirt "flip-ups," "spiking" (pulling down someone's pants or swimming suit); pinching; placing hands inside an individual's pants, shirt, blouse, or dress, etc.;
- h. unwelcome leers, stares, gestures, or slang that are sexually suggestive; sexually degrading or derogatory or imply sexual motives or intentions;
- i. clothing with sexually obscene or sexually explicit slogans or messages;
- j. unwelcome and offensive skits, assemblies, and productions that are sexually suggestive, sexually degrading or derogatory, or that imply sexual motives or intentions, or that are based on sexual stereotypes;
- k. unwelcome written or pictorial display or distribution (including via electronic devices) of pornographic or other sexually explicit materials such as signs, graffiti, calendars, objects, magazines, videos, films, Internet material, etc.;
- l. other hostile actions taken against an individual because of that person's sex, sexual orientation, gender identity or transgender status, such as interfering with, destroying or damaging a person's work or equipment; sabotaging that person's work; bullying, yelling, or name calling; or otherwise interfering with that person's ability to work; and

- m. any unwelcome behavior based on sexual stereotypes and attitudes that is offensive, degrading, derogatory, intimidating, or demeaning, including, but not limited to:
- disparaging remarks, slurs, jokes about or aggression toward an individual because the person displays mannerisms or a style of dress inconsistent with stereotypical characteristics of the person's sex;
 - ostracizing or refusing to participate in work activities with an individual because of the individual's sex, gender expression or gender identity;
 - taunting or teasing an individual because they are participating in an activity not typically associated with the individual's sex or gender.

For purposes of this regulation, action or conduct shall be considered "unwelcome" if the employee, intern, or non-employee did not request or invite it and regarded the conduct as undesirable or offensive. Sexual harassment may occur on school grounds, and at all school-sponsored activities, programs and events, including those that take place at locations outside the Questar III workplace, or outside the school setting if the harassment impacts the individual's employment in a way that violates their legal rights, including when employees, interns or non-employees travel on district business, or when the harassment is done by electronic means (including on social media).

9. *Sexual Violence* shall mean any nonconsensual sexual act proscribed by federal or state law, including when the victim lacks capacity to consent. Sexual violence includes rape, sexual assault, sexual abuse, forcible touching, aggravated sexual contact, and other offenses defined in N.Y. Penal Law Article 130.
10. *Unlawful Harassment* shall mean harassment on the basis of any protected characteristic. Unlawful harassment occurs when the work environment becomes intimidating, hostile or offensive as a result of conduct or communications which have the purpose or effect of substantially or unreasonably interfering with an employee's work performance or an intern's participation in an internship program.
11. *Unlawful Discrimination* shall mean discrimination on the basis of any protected characteristic.
12. *Non-employee* shall mean someone other than an employee of Questar who is a contractor, subcontractor, vendor, consultant or other person providing services pursuant to a contract or who is an employee of such contractor, subcontractor, vendor, consultant or other person providing services in a Questar III workplace.

13. *Intern* shall include paid and unpaid interns and student teachers.

14. *Employee* shall include all staff, including but not limited to full-time, part-time, seasonal, temporary workers regardless of immigration status.

B. Initial Complaint Procedures

1. Any employee or intern who believes he or she has been discriminated against or harassed, or has been the subject of retaliation, or a non-employee who believes he or she has been sexually harassed should immediately take one or more of the following steps:
 - a. Tell the offender that the conduct is offensive;
 - b. Discuss the matter with his or her supervisor;
 - c. Discuss the matter with the Questar III Director of Human Resources, or other designated Compliance Officer;
 - d. If the employee, non-employee or intern is not satisfied, he or she should file a written complaint, using the form attached to these regulations. Questar III, however, will investigate reported sexual or other unlawful harassment in the absence of a written complaint.
2. Interim Remedial Measures: Upon receipt of a complaint or report, the Compliance Officer, in consultation with the School Attorney or Deputy Superintendent, shall determine whether the complainant needs any accommodations to ensure his or her safety and well-being pending the outcome of the investigation. Interim remedial measures may include a temporary change in work assignment or location, and other measures to limit contact, to the extent feasible, with the alleged perpetrator. Questar III may also offer information on health services and mental health counseling services, rape victim or other victim advocacy services, and the right to report an act of sexual violence to local law enforcement. In determining what, if any, interim remedial measures are appropriate, the Compliance Officer should consider a number of factors including any specific need expressed by the complainant, the severity or pervasiveness of the alleged conduct, any continuing effects on the complainant, and the proximity of the complainant and alleged perpetrator.
3. Investigation: Questar III will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. Questar III will keep the investigation confidential to the extent possible. The standard of evidence used to evaluate a complaint or report of discrimination, sexual harassment or other unlawful harassment is a "preponderance of the evidence." Under this standard, a determination must be made on the basis of whether it is more likely than not that the alleged

perpetrator violated the policy prohibiting discrimination, sexual harassment or other unlawful harassment.

In investigating the complaint or report, the Director of Human Resources or other designated Compliance Officer shall:

- a. Meet with the appropriate individuals and review all appropriate records that bear on the case.
- b. Discuss the allegations in the complaint or report with the complainant and the alleged perpetrator at separate meetings, and provide the complainant and the alleged perpetrator with equal opportunities to identify witnesses and present evidence supporting their respective positions at these meetings.
- c. Provide the complainant and the alleged perpetrator with the same opportunities for a union representative or other non-attorney representative of their choice throughout the process, including any meeting, conference, hearing or other procedural action.
- d. Attempt, where appropriate, to resolve the complaint by exploring and suggesting possible solutions to the problem with all involved parties, provided, however, that the complainant will not be required to participate in mediation with the alleged perpetrator.

All employees, non-employees and interns of Questar III shall cooperate fully with the Compliance Officer and any designee of the Compliance Officer in such investigation.

4. As soon as possible, usually within twenty (20) business days after receipt of the complaint or report, the Compliance Officer shall make a finding in writing, using the preponderance of the evidence standard, that there has or has not been a violation of Questar III's policy prohibiting discrimination, sexual harassment or other unlawful harassment. If, due to the complexity of the investigation or other extenuating circumstances, a written decision cannot be issued within twenty business days, the Compliance Officer shall provide a written status report to both parties, and shall advise both parties of the estimated date by which a written determination shall be issued. In the event that the Compliance Officer finds that there has been a violation, she/he shall propose a resolution of the complaint. Such proposed resolution may include the implementation or continuation of remedial measures/accommodations to ensure the safety and well-being of the victim. In reviewing complaints involving non-employees, the extent of Questar III's control and any other legal responsibility which Questar III had with respect to the conduct of the harasser shall be considered.
5. Sexual harassment is considered a form of employee misconduct. Sanctions will be enforced against individuals engaging in sexual harassment and against

supervisory and managerial personnel who knowingly allow such behavior to continue.

6. Both the complainant and the alleged perpetrator shall be notified in writing of the outcome of the investigation.
7. If the complainant is not satisfied with the finding of the Compliance Officer, or with the proposed resolution of the complaint, then the complainant may, within ten (10) business days after she/he has received the Compliance Officer's report, file a written request for review by the District Superintendent.
8. The District Superintendent retains the authority to initially direct the complaint to his or her consideration. The District Superintendent may designate another person, such as the School Attorney or Assistant Superintendent, to carry out his/her responsibility with respect to either an initial investigation or review of the Compliance Officer's findings and proposed resolution, as set forth below.

C. Review by the District Superintendent

1. The District Superintendent may request that a complainant, the alleged perpetrator, and the Compliance Officer present a written statement to her/him setting forth any information that such person has relating to the complaint and the facts surrounding it.
2. The District Superintendent shall notify all parties concerned as to the time and place where separate meetings will be held where each party may appear and may present oral and written statements supplementing their positions in the matter. The complainant and the alleged perpetrator shall have the same right to be accompanied by a union representative or other non-attorney representative at such meetings. Such meetings shall be held as soon as possible, but no later than ten (10) business days after the receipt of a direct complaint or the appeal by the District Superintendent.
3. As soon as possible, but not later than fifteen (15) business days after the meetings with each party, the District Superintendent shall render her/his determination in writing, using the preponderance of the evidence standard. Such determination shall include a finding that there has or has not been a violation of Questar III's policies prohibiting discrimination, sexual harassment or other unlawful harassment and also a proposal for equitably resolving the complaint, including any remedial measures/accommodations for the victim, when appropriate.

E. Legal Protections and External Remedies

Sexual harassment is not only prohibited by Questar III, but is also prohibited by state, federal, and, where applicable, local law. Aside from the internal process at Questar III, employees may also choose to pursue legal remedies with the following governmental entities.

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed with the Division of Human Rights (DHR). DHR can be contacted at: (888) 392-3644, www.dhr.ny.gov/complaint, or at 1 Fordham Plaza, Fourth Floor, Bronx, NY 10458.

The United States Equal Employment Opportunity Commission (EEOC) enforces federal antidiscrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). Any employee or intern may file an external complaint with the EEOC. The EEOC can be contacted at (800) 669-4000, <https://www.eeoc.gov/employees/howtofile.cfm>, info@eeoc.gov, or at 33 Whitehall Street, 5th Floor, New York, NY 10004 or 300 Pearl Street, Suite 450, Buffalo, NY 14202.

Victims may also have the right to file sexual harassment complaints with the U.S. Department of Education's Office for Civil Rights (OCR). The OCR can be contacted at: (800) 421-3481, 400 Maryland Avenue SW, Washington, DC 20202-1100, or at <https://www2.ed.gov/about/offices/list/ocr/docs/howto.html>.

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.

Nothing in these regulations shall be construed to limit the right of the complainant to file a lawsuit in either state or federal court, or to contact law enforcement officials. Additionally, be aware that each of these agencies have time limitations on filing complaints.

F. Certain Restrictions

Individual nondisclosure agreements in connection with the resolution of a sexual harassment claim may only be used as permitted by law. Mandatory arbitration of sexual harassment claims is prohibited in all Questar III contracts and agreements entered into on or after July 11, 2018.

G. Retaliation

Any act of retaliation against any person who opposes sexually harassing behavior, or who has filed a complaint in good faith, is prohibited and illegal, and therefore subject to disciplinary action. Likewise, retaliation against any person who has, in good faith, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing of a sexual harassment complaint is prohibited. For purposes of this policy, retaliation includes but is not limited to:

verbal or physical threats, intimidation, ridicule, bribes, destruction of property, spreading rumors, stalking, harassing phone calls, discipline, discrimination, demotion, denial of privileges, any action that would keep a reasonable person from coming forward to make or support a sexual harassment claim, and any other form of harassment. Such actions need not be job- or education-related, or occur in the workplace or educational environment, to constitute unlawful retaliation. Any person who retaliates is subject to immediate disciplinary action, up to and including suspension or termination.

Any employee, non-employee or intern who believes that he or she has been retaliated against should bring his or her concern to the attention of the Director of Human Resources or other designated Compliance Officer, a Deputy Superintendent or the School Attorney. Complaints also may be submitted by email to : compliance@questar.org.

Regulations Adopted 1/18/05

REVISED: November 13, 2014

REVISED: May 18, 2017

REVISED: October 18, 2018

**DISCRIMINATION, SEXUAL HARASSMENT OR OTHER UNLAWFUL
HARASSMENT COMPLAINT FORM
Employees, Non-employees and Interns**

The Questar III Board of Education has prohibited discrimination, sexual harassment and other unlawful harassment of employees and interns and sexual harassment of non-employees. Questar III is committed to safeguarding the right of all employees and interns to work in an environment that is free from discrimination and all forms of harassment on the basis of race, color, national origin, sex, disability, age, religion, creed, sexual orientation, military status, predisposing genetic characteristics, marital status, domestic violence victim status, or other characteristic protected by federal or state law (collectively, the "protected characteristics"). It also is committed to prohibiting sexual harassment of non-employees in Questar III workplaces.

Instructions: This form may be completed by the complainant or a reporting designee. The complainant must sign the form. The form must be immediately filed with the Director of Human Resources or other designated Compliance Officer. Additional pages may be attached if needed.

Name of Complainant: _____ Date: _____

Title, School Building and/or Department: _____

Name of Immediate Supervisor or Building Administrator: _____

Home Address of Complainant: _____

Home Phone Number: _____ Work Phone Number: _____

Email: _____ Preferred method of communication: _____

Date(s) of Alleged Incidents: _____

Name(s) of Persons(s) Accused of Discrimination or Harassment: _____

Time and Place of Incident(s): _____

Is the alleged discrimination or harassment continuing? _____

Name(s) of Witness(es) or others who may have information, if any: _____

Basis of the alleged harassment (check all that apply):

_____ race

_____ national origin

_____ color

_____ sex

- | | |
|---|---|
| <input type="checkbox"/> disability | <input type="checkbox"/> predisposing genetic characteristics |
| <input type="checkbox"/> age | <input type="checkbox"/> marital status |
| <input type="checkbox"/> religion/creed | <input type="checkbox"/> domestic violence victim status |
| <input type="checkbox"/> sexual orientation | <input type="checkbox"/> other (specify) _____ |
| <input type="checkbox"/> military status | _____ |

Have you previously complained or provided information (verbal or written) to anyone at Questar III related to your complaint? If so, whom? _____

Description of incident(s): *Describe actions and statements of all persons involved, including yourself. Be specific. Use additional pages if necessary.*

Remedy Requested by Complainant:

This complaint is filed based upon my honest belief that I have been subjected to discrimination, sexual harassment or other unlawful harassment. I certify that the

information I have provided in this complaint is true, correct and complete to the best of my knowledge and belief.

Signature of Complainant: _____ Date: _____

Complaint Received By: _____ Date: _____

Complaint Received by Compliance Officer: _____