



**707. WORKPLACE GENDER TRANSITION  
PPSD POLICY**

<p><b>General Belief</b></p>	<p>The Providence School Board affirms its commitment to providing a safe and inclusive learning and working environment for all Providence Public School District (“PPSD” or “District”) students and employees, free from discrimination, regardless of sex, sexual orientation, gender identity, or gender expression.</p> <p>The Board adopted the Nondiscrimination—Transgender and Gender Expansive Students policy to ensure that all students have equal access to all PPSD educational programs and activities; to provide a safe and inclusive learning environment, free from discrimination; and to establish protocols and supports for students who undergo gender transitions.</p> <p>The Board recognizes the importance of policies that support the continued development of a positive and professional workplace that welcomes diversity as an organizational strength, and believes that the Workplace Gender Transition policy adopted by the City of Providence provides important and necessary protocols and supports for PPSD employees.</p>
<p><b>Purpose and Scope</b></p>	<p>The purpose of the Workplace Gender Transition policy is to provide clear protocols for PPSD employees who express that they wish to transition from one gender to another in the workplace, for their immediate supervisors and colleagues, and for the District’s administrative support staff.</p> <p>The process developed by the City of Providence was carefully designed to be minimally disruptive to departmental operations, to meet the needs of the employees enacting the protocols, and to provide training and tools in order to promote a supportive work environment.</p> <p>This policy is based on the City of Providence Workplace Gender Transition policy and protocols, and applies to all PPSD employees.</p>
<p><b>Definitions</b></p>	<p>The following definitions are provided to assist in understanding this policy. Employees may or may not use these terms to describe themselves.</p> <p><b>Chosen Name/Pronoun:</b> The name and pronoun an individual uses, regardless of the individual’s given name, legal name, or gender assigned at birth.</p> <p><b>Gender-Based Harassment:</b> Unwelcome conduct that is based on gender, and is unlawful where 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.</p>

	<p><b>Gender-Based Discrimination:</b> Discrimination based on gender in the recruitment, hiring, promotion, compensation, benefits, or other employment-related decisions, which violate district policy, and/or city, state or federal law.</p> <p><b>Gender Expression:</b> The manner in which a person represents or expresses gender to others, often through behavior, clothing, hairstyles, activities, voice, or mannerisms.</p> <p><b>Gender Identity:</b> A person’s deeply held sense or psychological knowledge of their own gender, which can include being female, male, another gender, or no gender. Gender identity is an innate and largely inflexible part of a person’s identity. One’s gender identity can be the same or different than the gender assigned at birth. The responsibility for determining an individual’s gender identity rests with the individual.</p> <p><b>Gender Nonconforming:</b> A term for people whose gender expression differs from stereotypical expectations. This includes people who identify outside traditional gender categories or identify as multiple genders. Other terms that can have similar meanings include gender diverse or gender expansive.</p> <p><b>Sexual Orientation:</b> A person’s inherent emotional, romantic or sexual attraction to other people.</p> <p><b>Transgender:</b> An adjective describing a person whose gender identity or expression is different from that traditionally associated with an assigned gender at birth.</p> <p><b>Transition:</b> The process in which a person goes from living and identifying as one gender to living and identifying as another. Transition is a process that is different for everyone, and it may or may not involve social, legal, or physical changes. There is no one step or set of steps that an individual must undergo in order to have their gender identity affirmed and respected.</p> <p><b>Sex Assigned at Birth or Assigned Sex:</b> Refers to the gender designation listed on one’s original birth certificate.</p> <p><b>Sex-Specific Facilities:</b> Refers to facilities and accommodations used by students at school or during school-sponsored activities and trips, and include, but are not limited to, restrooms, locker rooms, and overnight facilities.</p>
<p><b>Guidelines and Implementation Strategies</b></p>	<p>PPSD will inform employees about the City of Providence <a href="#">Workplace Gender Transition Protocols and Guide</a>. Additionally, the following guidelines will be part of PPSD regulations to implement the Workplace Gender Transition policy.</p> <ol style="list-style-type: none"> <li>1. <u>Harassment, and Discrimination</u>  District employees have the right to perform their work duties free from discrimination or harassment based upon actual or perceived gender identity or expression. Instances of discrimination or harassment may include, but are not limited to: <ol style="list-style-type: none"> <li>(a) Disparate treatment of an employee as a result of the employee’s gender identity or expression.</li> </ol> </li> </ol>

- (b) Denying an employee access to facilities/restrooms/locker rooms which correspond to the employee’s gender identity.
- (c) Applying or enforcing a gender-specific dress code.
- (d) Refusing to respect an employee’s gender identity by intentionally referring to an employee by a name or by pronouns that the employee no longer uses or does not correspond to the employee’s gender identity.
- (e) Acts of retaliation against any employee or person because of gender identity or expression.

Complaints alleging discrimination or harassment based on a person’s actual or perceived gender identity or expression will be referred to the Human Resources office and handled in a manner consistent with Board policies, and local, state, and federal law.

2. Privacy and Confidentiality

Information about an employee, including assigned birth sex, name change for gender identity purposes, gender transition, medical or mental health treatment related to gender identity, or any other information of a similar nature, may constitute confidential medical information protected under Rhode Island General Law §5-37.3. District employees may not disclose information that may reveal an employee’s transgender status or gender nonconforming presentation to others, including, but not limited to, District employees, students, families, or volunteers, unless legally required to do so, or unless the employee has explicitly authorized such disclosure.

Under typical circumstances, some parties, such as certain Human Resources employees, the employee’s direct supervisor, and/or the employee’s direct colleagues may need to be made aware of such information in order to complete necessary administrative preparations such as name and documentation changes. Such information will be shared only as part of the Workplace Transition Plan developed with input from the transitioning employee and supervisor.

3. Names and Pronouns

Employees have the right to be addressed by the name and pronoun of their choice. PPSD employees are expected to use an employee’s chosen name and pronouns in a respectful and appropriate manner, regardless of whether or not they approve of, or accept an individual’s right to be transgender or undergo a gender transition. A court-ordered name or gender change is not required to update the employee’s name and gender in many aspects of the workplace. Supervisors should work with the transitioning employee, administrative staff, the Human Resources office, and the Information Technology office to ensure personnel information is updated by the first day of an employee’s workplace

transition or as outlined in the transition plan. Updates should include but are not limited to the following:

- a) The employee's work station name plate, name tag, and access/identification card should reflect the employee's-chosen name.
- b) Organizational charts, team rosters, PPSD webpage listings, and phone directories should reflect the employee's preferred name.
- c) The employee's email address should reflect the employee's chosen name.
- d) Photographs on the employee's access/identification card and photographs on display in the workplace should portray the individual according to their gender identity.
- e) Every reasonable effort should be made to update the employee's name/gender with contractors, third-parties, and vendors used by the employee's department.

4. Employee Records

Certain PPSD records must match the employee's legal name and cannot be altered until a legal name change has been achieved.

Some employees are legally required to have a current and valid professional license to function in their role. At some point, their legal name may change and no longer match the name on their professional license. Employees must sign reports, plans, etc. with the name on the license until their license has been updated to reflect their new name by the applicable licensing body.

Certain types of records, such as those relating to payroll, insurance, and retirement accounts, require a legal name change before the individual's name can be changed. When an employee changes their legal name for any reason, they should notify the Human Resources office. After the employee provides Human Resources with official notification of a legal name change, Human Resources will update personnel and administrative records accordingly. Documentation is not required to update the employee's name and gender in many other aspects of the workplace.

5. Gender Segregated Facilities

PPSD employees have a right to access restrooms, locker rooms, or changing facilities that corresponds to their gender identity, regardless of the employee's sex assigned at birth. Some PPSD facilities have single-user, all-gender restrooms, which are available for use by any employee, regardless of the underlying reason.

Any employee who makes a request, regardless of the underlying reason, will be provided with a reasonable alternative changing area/locker

	<p>room, such as the use of a private area, or a gender neutral restroom. Alternative arrangements for transgender employees will be provided in a way that allows them to keep their transgender status confidential if they choose to do so.</p> <p>6. <u>Dress Codes</u> PPSD employee dress codes shall be gender-neutral, and supervisors cannot enforce specific attire based on gender.</p> <p>Transgender and gender non-conforming employees have the right to comply with dress codes and professional appearance standards in a manner consistent with their gender identity or gender expression. Supervisors may not deny an employee the right to dress according to their gender identity as long as the employee complies with PPSD established dress codes that define professional attire.</p> <p>7. <u>Health Insurance Benefits</u> All PPSD active and retiree benefit plans cover transgender-inclusive services. This coverage is explained in detail in the Blue Cross Blue Shield of Rhode Island Medical Coverage Policy for Gender Reassignment Surgery.</p> <p>A copy of the Medical Coverage Policy can be found on the Benefits page of the City’s website (<a href="http://providenceri.gov/benefits">providenceri.gov/benefits</a>). Employees should contact the Benefits Office for confidential assistance. For additional questions related to coverage, providers, or navigation of the benefits provided,</p> <p>8. <u>Employee Workplace Transition Plan</u> A Workplace Transition Plan should be developed with input from the supervisor and the transitioning employee to meet the needs of the employee and the organization.</p> <p>PPSD employees, supervisors, and others supporting the transitioning employee should refer to and be familiar with the “Workplace Transition Plan” section and “Transition Plan Checklist” in the City of Providence <a href="#">Workplace Gender Transition Protocols and Guide</a>.</p>
<p>Training, Oversight, and Communication</p>	<p>Guidance, support, and training, to the extent necessary to implement this policy and support transitioning employees, will be provided by the City of Providence LGBTQ Liaison, and/or others designated by the City of Providence.</p> <p>Additionally, the Superintendent or designee will ensure that this policy and associated regulation are communicated to all PPSD employees.</p>

Compliance with Laws, Confidentiality Requirements	The Superintendent will ensure that all PPSD personnel and all PPSD contractors comply fully with all applicable laws, rules, and regulations, and with all Board policies. In the event any part of any policy is unlawful, the Superintendent will report such event to the Board as soon as practicable and request of the Board a modification of this policy.
Legal Reference	20 U.S.C. §§ 1681–1688; 34 C.F.R. Pt. 106; 28 C.F.R. Pt. 54 (Title IX of the Education Amendments of 1972 and implementing regulations). Title VII of the Civil Rights Act of 1964, § 7, 42 U.S.C. § 2000e et seq RIGL §5-37.3 (Confidentiality of Health Care Information Act) RIGL § 11-24-2 (Discriminatory practices prohibited)
Cross Reference	City of Providence <a href="#">Workplace Gender Transition Protocols Policy</a> . City of Providence <a href="#">Workplace Gender Transition Protocols and Guide</a> .
History	Policy Committee Review: December 6, 2017 Approved by Board: December 13, 2017
Resources	<i>Transgender Explained For Those Who Are Not</i> , Joanne Herman <i>Transgender 101: A Simple Guide to a Complex Issue</i> , Nicholas Teich National Center for Transgender Equality: <a href="https://transequality.org/">https://transequality.org/</a> Human Rights Campaign Transgender FAQ: <a href="https://www.hrc.org/resources/transgender-faq">https://www.hrc.org/resources/transgender-faq</a> Youth Pride Inc: <a href="http://youthprideri.org/">http://youthprideri.org/</a>