September 5, 2012

The Honorable Thomas J. Borris
Presiding Judge
Orange County Superior Court
700 Civic Center Drive West
Santa Ana, CA  92701

Re:  Irvine Unified School District’s Response to 2011-12 Orange County Grand Jury Report, “Anti-Bullying Programs in Orange County Schools”

To the Honorable Thomas J. Borris:

In accordance with California Penal Code section 933.05, the Orange County Grand Jury has requested that the Irvine Unified School District ("District") respond to Findings 1-4 and Recommendations 1-3, 6-7 in the 2011-12 Orange County Grand Jury Report entitled, “Anti-Bullying Programs in Orange County Schools.”¹

Finding 1: Not all Orange County schools use the same technology, procedures and codes to record bullying or harassment incidents.

Response to Finding 1: The District agrees partially with this finding. The District agrees that not all Orange County schools use the same technology and procedures to record bullying or harassment incidents. Different districts use different databases and internal procedures to track bullying complaints. With regard to the codes used to record bullying or harassment incidents, prior to July 1, 2012, Education Code section 48900(r) defined bullying by reference to sexual harassment (Education Code section 48900.2), hate violence (Education Code section 48900.3), and harassment, threats and intimidation (Education Code section 48900.4). The law did not contain a stand-alone definition of bullying. However, as of July 1, 2012, Education Code section 48900(r) provides a stand-alone definition of the term “bullying.” (AB 1156.) School districts throughout California are bound by this statute.

Finding 2: New legislation takes effect July 1, 2012, and broadens the definition of “Bullying.”

Response to Finding 2: The District agrees that AB 1156 provides a broader definition of “bullying” than was contained in prior law.

Finding 3: Education Code section 234.1 requiring posting of anti-bullying/anti-harassment policies in prescribed areas was not evident in all schools visited.

¹ The Orange County Superintendent of Schools has been directed to respond to Recommendations 4 and 5.
Response to Finding 3: The District cannot comment on what policies are posted in all schools throughout Orange County, but can respond only on behalf of the District itself. Finding 3 combines the requirement to post anti-discrimination/anti-harassment policies in prescribed areas with the requirement to post anti-bullying policies. The requirement for school districts to post their anti-bullying policy in all schools and offices, including staff lounges and pupil government meeting rooms, is new as of July 1, 2012. Thus, the District disagrees with Finding 3 to the extent it reflects on the District’s practice in regard to posting its anti-bullying policy in prescribed areas prior to July 1, 2012.

In regard to the finding that the District failed to post its anti-harassment policies in prescribed areas, the District disagrees with this finding. The district has provided discrimination/anti-harassment policies to all sites (schools and others) to post in staff lounges. However, they are not posted in all offices and pupil government meeting rooms. The district will provide additional signage for these areas by November 1, 2012.

Finding 4: Based on witness testimony, confidentiality was not maintained in a bullying incident as prescribed in California Education Code section 234.1

Response to Finding 4: The Grand Jury report does not contain sufficient information to enable the District to respond to this finding nor does it identify which school district was involved in the alleged breach of confidentiality; therefore, the District disagrees wholly with this finding.

Recommendation 1: Recommend a county-wide compatible information system for reporting incidents of bullying be explored by all school districts.

Response to Recommendation 1: This recommendation will not be implemented because it is not warranted and is not reasonable. The District tracks incidents of bullying as follows: individual sites track incidents of bullying using the discipline module in Aeries. As a district, Board Policy and Administrative Regulations were rewritten in September 2011 and updated in July 2012 to outline the District’s General Complaint Procedure (BP 1312.1) Uniform Complaint Procedure (BP 1312.2 and Alternative Uniform Complaint Procedure (BP 1312.3). Each school website and the district website have links to “General Complaint Procedural Guidelines” and a “Parent Guide to Complaint Procedures” to help parents understand which forms to use for a specific type of complaint. Sites track General Complaints of discrimination, harassment, intimidation and bullying and their resolution. If a General Complaint reaches the district level the complaint and their resolution are logged along with Uniform or Alternative Uniform Complaints in the Superintendent’s office. Different districts use different technology and procedures that reflect the unique needs of each district. While all districts will comply with State-mandated reporting, such as the California Longitudinal Pupil Achievement Data System (CALPADS), it is not necessary or practical that each district use the same internal procedures and technology to track reported incidents of bullying.

Recommendation 2: Recommend all county-wide schools agree upon the same definition of bullying.

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Response to Recommendation 2: The District will not implement this policy because it is not warranted and is not reasonable. The District has no legal authority to obligate other school districts. However, it should be noted that the District is required by law to apply the definition of “bullying” contained in Education Code section 48900(r) in suspending and expelling students. The District also intends to use this definition of “bullying” in tracking complaints of bullying that are sustained.

Recommendation 3: Each district review standardized procedures to protect a bully victim and bystanders’ confidentiality as stated in Education Code section 234.1

Response to Recommendation 3: This recommendation has been implemented. As of July 1, 2012, AB 1156 and Education Code 48900 (r) have been amended and broadened to define bullying as follows: “Bullying” means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a pupil or group of pupils as defined in Section 48900.2, 48900.3, or 48900.4, directed toward one or more pupils that has or can be reasonably predicted to have the effect of one or more of the following:

a. Placing a reasonable pupil or pupils in fear of harm to that pupil’s or those pupils’ person or property.
b. Causing a reasonable pupil to experience a substantially detrimental effect on his or her physical or mental health.
c. Causing a reasonable pupil to experience substantial interference with his or her academic performance.
d. Causing a reasonable pupil to experience substantial interference with his or her ability to participate in or benefit from the services, activities, or privileges provided by a school.

On August 21, 2012, the District adopted updated Board Policies on Bullying and Cyberbullying that included policy in regard to retaliation and confidentiality. Refer to Attachment Board Policy 5145.8 on Bullying/Cyber-Bullying. The District intends to remind its employees of these policies as follows:

- Through elementary, middle school, and high school principal meetings and coordinator level meetings;
- Through site level staff development training on bullying and cyberbullying;
- Through the Student Services monthly eNewsletter and webpage.

Recommendation 6: Recommend each district explore the development of a county-wide standard information system for recording incidents of bullying.

Response to Recommendation 6: This recommendation will not be implemented because it is not warranted and is not reasonable. The District tracks incidents of bullying as follows: The District utilizes Eagle Aeries software as its data information system. This software is the most commonly utilized data software system in Orange County schools. A separate, additional data information system is not a reasonable option as this will require double entry, which is not effective or necessary. Aeries software has the capability of including detailed information on bullying including information on the target, perpetrator, and bystanders. Individual districts do not have legal control over other districts in the state of California and the
county superintendents would have to be involved collectively to further analyze this recommendation. In addition, CALPADS currently records suspensions and expulsions related to bullying statewide.

As a district, Board Policy and Administrative Regulations were rewritten in September 2011 and updated in July 2012 to outline the Districts General Complaint Procedure (BP 1312.1) Uniform Complaint Procedure (BP 1312.2) and Alternative Uniform Complaint Procedure (BP 1312.3). Each school website and the district website have links to “General Complaint Procedural Guidelines” and a “Parent Guide to Complaint Procedures” to help parents understand which forms to use for a specific type of complaint. Sites track General Complaints of discrimination, harassment, intimidation and bullying and their resolution. If a General Complaint reaches the district level, the complaint and their resolution are logged along with an Uniform or Alternative Uniform Complaints in the Superintendent’s office.

Different districts use different technology and procedures that reflect the unique needs of each district. While all districts will comply with State-mandated reporting, such as the California Longitudinal Pupil Achievement Data System (CALPADS), it is not necessary that each district use the same internal procedures and technology to track reported incidents of bullying.

Recommendation 7: All schools post anti-bullying/anti-harassment policy in offices, staff lounges and student government meeting areas as prescribed in Education Code section 234.1

Response to Recommendation 7: The District has implemented this recommendation. An email dated July 10, 2012, and anti-bullying posters were sent to all schools in the District to be posted in all required areas. Anti-harassment posters will be delivered to school sites by November 1, 2012 and sites will be directed to post them in all required areas.

If you have any further questions or need additional information, please contact Alan Schlichting, Director of Student Support Services at 949-936-5069.

Sincerely,

Terry Walker
Superintendent

Attachments:
1. Recommendation 1: Board Policy 1312.1: General Complaint Policy
2. Recommendation 1: Procedural Guidelines for Board Policy 1312.1
3. Recommendation 3: Board Policy 5145.8: Bullying/Cyber Bullying
4. Recommendation 7: Anti Bullying Poster

cc: Orange County Grand Jury
700 Civic Center Drive West
Santa Ana, CA 92701
GENERAL COMPLAINT POLICY
FOR PARENTS AND GUARDIANS

The Board of Education encourages early, informal resolution of complaints at the school site level whenever possible. However, it recognizes that there are occasions when a more formal process is necessary. Still, even in those circumstances, the Board strongly believes that the majority of parent/guardian general complaints are most successfully addressed by site-level school staff members and administrators.

The Board of Education authorizes the Superintendent of the District to prepare written procedures, via administrative regulation, whereby parents or guardians of currently enrolled students may present a formal written complaint against any District employee, or with respect to any District program, practice, policy, or procedure.

The General Complaint Policy is applicable to any issue or complaint that falls outside the parameters of the District’s Uniform Complaint Policy (Board Policy: 1312.2) or Alternative Uniform Complaint Policy (Board Policy: 1312.3). Copies of these policies are available online at http://www.iusd.org/ or through the District Administrative Offices.

Policy Adopted: December 6, 2011

Procedural Guidelines

Administrative Regulation

Form 1312.1
Form 1312.1(a)
Form 1312.1(b)
GENERAL COMPLAINT POLICY FOR PARENTS AND GUARDIANS

The following procedures shall be used to address all complaints appropriately brought pursuant to the District's General Complaint Policy (BP 1312.1). The General Complaint Policy and Administrative Regulation is applicable to any parent or guardian issue or complaint that falls outside the parameters of the District's Uniform Complaint Policy (Board Policy 1312.2) or Alternative Uniform Complaint Policy (Board Policy 1312.3). These procedures are designed in accordance with the Board of Education's philosophy that the majority of parent/guardian general complaints are most successfully addressed by site-level school staff members and administrators.

Step 1: Filing of General Complaint
Who:
Only a parent or guardian (or his/her representative) of a currently enrolled student may utilize the General Complaint procedures.

How:
Complaints pursuant to the District's General Complaint Policy may not be anonymous, must be put in writing on Form 1312.1, and must be signed by the complainant. If a complainant requests to submit a formal complaint to any District administrator or teacher, that administrator or teacher can inquire whether the complainant wishes to utilize the formal procedures herein, or whether they simply desire informal resolution at the site level. In the event the complainant wishes to utilize these formal procedures, such administrator or teacher shall refer the complainant to Board Policy, Administrative Regulation and Form 1312.1 and specifically inform them of their responsibility to put the complaint in writing. Complainants who make verbal complaints to any other District staff members shall be directed to discuss their concerns with the site principal or another appropriate administrator.

Complainants must utilize Form 1312.1 for their complaint to be regarded as a General Complaint under Board Policy 1312.1. If a complainant states to District staff that he or she is unable to put his/her complaint in writing due to conditions including but not limited to disability or illiteracy, District staff shall assist him/her in putting his/her verbal complaint in writing. However, if the complainant is capable of, but refuses to or neglects to put his/her complaint in writing by utilizing Form 1312.1, the District is not obligated to proceed with the General Complaint procedures.

It shall be the responsibility of the principal or designee of each school to receive and process all General Complaints. Therefore, the completed Form 1312.1 must be delivered to the principal or his/her designee of the school site the student attends OR the school site to which the complaint pertains.

When:
Any general complaint brought pursuant to Board Policy 1312.1 must be brought within fifteen (15) business days of the action or inaction giving rise to the complaint OR within fifteen (15) business days of the date such action or inaction was discovered by the complainant.
Step 2: Meeting with Staff Member and Written Response
The principal or designee will arrange a mutually agreeable date and time (not to exceed ten (10) business days from the date of receipt of the complaint) for the complainant and pertinent District staff member(s) to meet to discuss the complaint and attempt to resolve it. For the purposes of our General Complaint Policy, a business day shall be defined as a day that the school is open.

The principal or designee would not typically be present at this meeting, unless the principal or designee determines their involvement would be appropriate.

If the complainant refuses to attend such a meeting, the District is not obligated to proceed with the General Complaint procedures.

If the complaint is resolved, the complainant shall acknowledge the resolution on Form 1312.1(a).

If the complaint is not resolved, the pertinent District staff member(s) is responsible for putting his/her response to the complaint in writing and delivering such response to the principal or designee and the complainant within ten (10) business days of the meeting.

Step 3: Meeting with Site Level Administrator and Written Response
In the event the complaint is not resolved by the pertinent staff member at the initial meeting, the principal or designee shall, within two (2) business days of receipt of response, forward the complaint and the staff member's written response to the appropriate site level administrator.

At the elementary level, the appropriate site level administrator will likely be the principal him or herself. However, at the middle school and high school level, the site level administrator may be, for example, the athletic director, curriculum chairperson, etc.

The site level administrator will arrange a mutually agreeable date and time (not to exceed ten business (10) days from the date of the staff member’s written response) to meet with the complainant to discuss the complaint and attempt to resolve it. At his or her discretion, the site level administrator may choose to meet with the complainant jointly with the pertinent staff member(s).

If the complainant refuses to attend such a meeting, the District is not obligated to proceed with the General Complaint procedures.

If the complaint is resolved, the complainant shall acknowledge the resolution on Form 1312.1(a).

If the complaint is not resolved, the site level administrator will conduct an investigation and will deliver a written response to the principal or designee and the complainant within ten (10) business days of the meeting.

Step 4: Meeting with School Site Principal and Written Response
NOTE: This step shall be omitted in the event the appropriate site level administrator in Step 3, above, was the school site principal.
In the event the complaint is not resolved by the site level administrator, the school site principal will arrange a mutually agreeable date and time (not to exceed ten (10) business days from the date of the site level administrator's written response and decision) to meet with the complainant to discuss the complaint and attempt to resolve it. At his or her discretion, the school site principal may choose to meet with the complainant jointly with the pertinent staff member(s) and/or the site level administrator.
If the complainant refuses to attend such a meeting, the District is not obligated to proceed with the General Complaint procedures.

If the complaint is resolved, the complainant shall acknowledge the resolution on Form 1312.1(a).

If the complaint is not resolved, the school site principal shall conduct an additional investigation and deliver a written response and decision to the complainant within fifteen (15) business days of the meeting.

**Step 5: Final Appeal to Superintendent's Office**

In the event the complaint is not resolved by utilization of Steps 1-4, the complainant may appeal the decision of the school site principal by filling out Form 1312.1(b) and delivering it to the principal or designee within fifteen (15) business days of receipt of the school site principal's decision.

The principal shall then, within two (2) business days of receipt of appeal (Form 1312.1(b)), forward the complaint, the staff member's written response, the site level administrator's written response and decision and, if applicable, the school site principal's written response and decision to the Superintendent's office.

The Superintendent, may, in his discretion, delegate his responsibilities under this section to another District administrator, including but not limited to the Assistant Superintendent of Education Services, the Director of Elementary Education, the Director of Secondary Education, the Director of Alternative Education, or any of the District's Coordinators.

The Superintendent or his designee will arrange a mutually agreeable date and time (not to exceed fifteen (15) business days from the date the appeal is received) to meet with the complainant to discuss the complaint and attempt to resolve it. At his or her discretion, the Superintendent or his designee may choose to meet with the complainant jointly with the pertinent staff member(s), the site level administrator, and/or the school site principal.

If the complainant refuses to attend in such a meeting, the District is not obligated to proceed with the General Complaint procedures.

If the complaint is resolved, the complainant shall acknowledge the resolution on Form 1312.1(a).

If the complaint is not resolved, the Superintendent or his designee will conduct an additional investigation and deliver the District's final written response and decision to the school site principal or designee and the complainant within thirty (30) business days of the meeting.

The decision of the Superintendent or his designee shall be final and is not appealable to the Board of Education.

December 6, 2011

**Board Policy: 1312.1**

**General Complaint Policy Checklist**
BULLYING / CYBER BULLYING

Bullying
The Governing Board recognizes the harmful effects of bullying on student learning and school attendance and desires to provide safe school environments that protect students from physical and emotional harm. District employees shall establish student safety as a high priority and shall not tolerate bullying of any student.

No student or group of students shall, through physical, written, verbal, or other means, harass, sexually harass, threaten, intimidate, cyberbully, cause bodily injury to, or commit hate violence against any other student or school personnel. Students who have been bullied or cyberbullied shall promptly report such incidents to any staff member.

This policy applies to all of the District's students. This policy applies to all acts related to school activity or school attendance occurring within a school under the jurisdiction of the superintendent of the Irvine Unified School District. (Education Code 234.1 (a))

Complaints of bullying and cyberbullying shall be investigated promptly, and corrective action shall be taken when a complaint is verified. Neither reprisals nor retaliation shall occur as a result of the submission of a complaint and confidentiality is to be maintained.

This policy also reminds school personnel of their obligation to intervene when safe to do so as required by Education Code section 234.1(b)(1).

Definitions
"Bullying" means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a pupil or group of pupils as defined in Section 48900.2, 48900.3, or 48900.4, directed toward one or more pupils that has or can be reasonably predicted to have the effect of one or more of the following:

(a) Placing a reasonable pupil or pupils in fear of harm to that pupil's or those pupils' person or property.
(b) Causing a reasonable pupil to experience a substantially detrimental effect on his or her physical or mental health.
(c) Causing a reasonable pupil to experience substantial interference with his or her academic performance.
(d) Causing a reasonable pupil to experience substantial interference with his or her ability to participate in or benefit from the services, activities, or privileges provided by a school.

"Cyberbullying" includes the transmission of harassing
communications, direct threats, or other harmful texts, sounds, or images on the Internet, social media, or other technologies using a telephone, computer, or any wireless communication device. Cyberbullying also includes breaking into another person's electronic account and assuming that person's identity in order to damage that person's reputation.

"Electronic act" means the transmission of a communication, including, but not limited to, a message, text, sound, or image, or a post on a social network Internet Web site, by means of an electronic device, including, but not limited to, a telephone, wireless telephone, or other wireless communication device, computer or pager.

"Reasonable pupil" means a pupil, including, but not limited to, an exceptional needs pupil, who exercises average care, skill, and judgment in conduct for a person of his or her age, or for a person of his or her age with his or her exceptional needs.

Prohibition Against Bullying
The District prohibits bullying as defined in this policy. This includes, but is not limited to, discrimination, harassment, intimidation and bullying based on the actual or perceived characteristics set forth in Penal Code section 422.55 and Education Code section 220, and disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, perceived characteristics. (Education Code 2341.1(a); 48900(r)). In addition, the District prohibits retaliation against complainants.

Free Speech Protection
This policy shall not be construed to limit pupil rights to free speech as protected by the United States Constitution, the California Constitution, Education Code sections 48907 and 48950, and other applicable law.

Duties and Responsibilities of School Employees
If school personnel witness an act of discrimination, harassment, intimidation, or bullying, he or she shall take immediate steps to intervene when safe to do so. (Education Code 2341.1(b)(1))

Reporting and Investigating Complaints
Any employee who has knowledge of discrimination, harassment, intimidation or bullying shall inform the site administrator of the concern as soon as possible. The site administrator shall investigate accordingly.

Students may submit to a teacher or administrator a verbal or written complaint of conduct they consider to be bullying. Formal complaints of bullying shall be made pursuant to the District's General Complaint or Uniform Complaint procedures specified in BP 5145.7.

When a student is reported to be engaging in bullying off campus, the Superintendent or designee shall investigate and document the activity and shall identify specific facts or circumstances that explain the impact or potential impact on school activity, school attendance, or the targeted student's educational performance.

If the student is using a social networking site or service that has
terms of use that prohibit posting of harmful material, the Superintendent or designee also may file a complaint with the Internet site or service to have the material removed.

**Discipline**
Any student who engages in bullying on school premises, or off campus in a manner that causes or is likely to cause a substantial disruption of a school activity or school attendance, shall be subject to discipline, which may include suspension or expulsion, in accordance with district policies and regulations.

**Notifications**
The District shall publicize this policy, including information about the manner in which to file a complaint, to pupils, parents, employees, agents of the governing board and the general public. The information shall be translated pursuant to Education Code section 48985. This policy shall be posted in all schools and offices, including staff lounges and pupil government meeting rooms. (Education Code 234.1 (c) and (d))

**Bullying Prevention**
To the extent possible, district and school strategies shall focus on prevention of bullying by establishing clear rules for student conduct and strategies to establish a positive, collaborative school climate. Students shall be informed, through student handbooks and other appropriate means, of district and school rules related to bullying, mechanisms available for reporting incidents or threats, and the consequences for perpetrators of bullying.

The district may provide students with instruction, in the classroom or other educational settings, that promotes effective communication and conflict resolution skills, social skills, character/values education, respect for cultural and individual differences, self-esteem development, assertiveness skills, and appropriate online behavior.

School staff shall receive related professional development, including information about early warning signs of harassing/intimidating behaviors and effective prevention and intervention strategies.

**Interdistrict Transfers**
A pupil who has been determined by personnel of either the district of residence or the district of proposed enrollment to have been the victim of an act of bullying committed by a pupil of the district of residence shall, at the request of the person having legal custody of the pupil, be given priority for interdistrict attendance under any existing interdistrict attendance agreement or, in the absence of an agreement, be given additional consideration for the creation of an interdistrict attendance agreement. (Education Code 46600(b))

Policy Adopted: February 3, 2009
Policy Revised: August 21, 2012

**Legal References:**
EDUCATION CODE
200-262.4 Prohibition of discrimination
32282 Comprehensive safety plan
35181 Governing board policy on responsibilities of students
35291-35291.5 Rules
48900-48925 Suspension or expulsion
48985 Translation of notices
PENAL CODE
647 Use of camera or other instrument to invade person's privacy; misdemeanor
647.7 Use of camera or other instrument to invade person's privacy; punishment
653.2 Electronic communication devices, threats to safety
UNITED STATES CODE, TITLE 47
254 Universal service discounts (e-rate)
COURT DECISIONS
Management Resources:
CSBA PUBLICATIONS
Safe Schools: Strategies for Governing Boards to Ensure Student Success, 2011
Providing a Safe, Nondiscriminatory School Environment for All Students, Policy Brief, April 2010
Cyberbullying: Policy Considerations for Boards, Policy Brief, July 2007
CALIFORNIA DEPARTMENT OF EDUCATION PUBLICATIONS
Health Education Content Standards for California Public Schools: Kindergarten Through Grade Twelve, 2008
Bullying at School, 2003
U.S. DEPARTMENT OF EDUCATION, OFFICE FOR CIVIL RIGHTS PUBLICATIONS
Dear Colleague Letter: Harassment and Bullying, October 2010
WEB SITES
CSBA: http://www.csba.org
California Cybersafety for Children: http://www.cybersafety.ca.gov
California Department of Education, Safe Schools Office:
http://www.cde.ca.gov/ls/ss
Center for Safe and Responsible Internet Use: http://cyberbully.org
National School Boards Association: http://www.nsba.org
National School Safety Center: http://www.schoollsafty.us
U.S. Department of Education, Office for Civil Rights:
http://www.ed.gov/about/offices/list/ocr

-------------------------------------------------------------------------------
Every student is entitled to a safe school environment free from discrimination, harassment, intimidation and bullying.

The District's Policy on Bullying can be accessed on the District’s website, www.iusd.org. Copies are also available in the school office upon request.

1. The District prohibits bullying. This includes, but is not limited to, discrimination, harassment, intimidation and bullying based on the actual or perceived characteristics set forth in Penal Code section 422.55 and Education Code section 220, and disability gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or association with a person or group with one or more of these actual or perceived characteristics. Bullying is defined in Education Code section 48900(r).

2. School personnel must immediately intervene if they witness an act of discrimination, harassment, intimidation or bullying, provided it is safe to do so.

3. Acts of discrimination or bullying should be brought to the attention of the principal immediately.

4. Complaints of bullying or discrimination will be considered confidential. However, it may be necessary to disclose certain information in order to effectively investigate.

5. Students who violate the District’s policies on bullying or discrimination may be subject to discipline, including suspension and expulsion.

6. The District prohibits retaliation against individuals who make complaints of bullying or provide information related to such complaints.

7. You may make a confidential complaint by contacting the site principal and/or complete Complaint Form 1312.1 available under IUSD Complaint Procedures on any school or district website. If there is sufficient corroborating information, an investigation will commence.