



# WOODBRIIDGE BOARD OF EDUCATION

## Title IX - Sexual Harassment Training August 17, 2022

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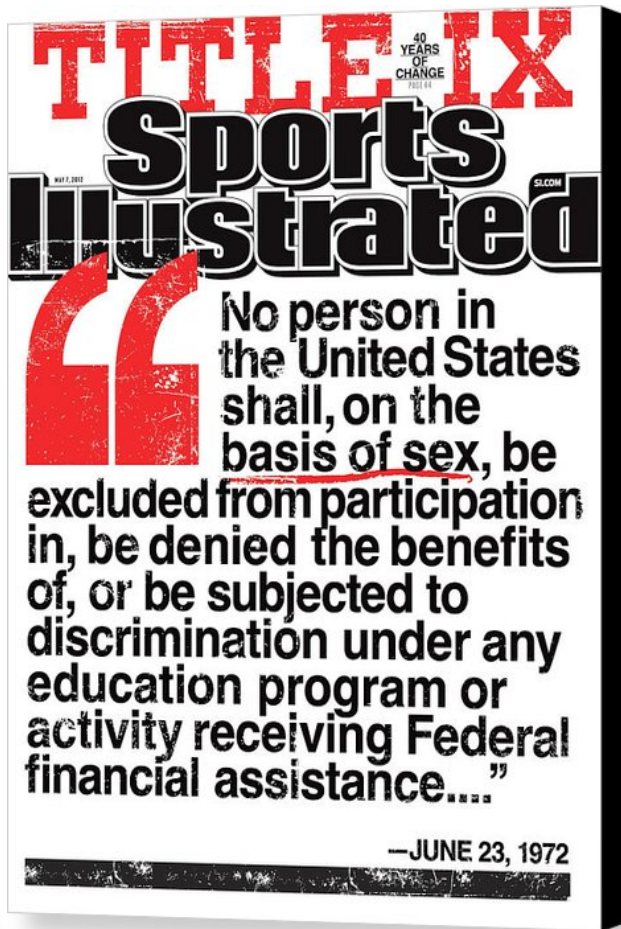


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# Introduction

- The U.S. Department of Education has at long last adopted regulations regarding sexual harassment in the school setting – this has been nearly 50 years in the making.
- In response to criticism at the post secondary level, the regulations provide due process for persons accused of sexual harassment, changes the definition of sexual harassment, and requires schools to adopt a detailed grievance procedure to guide the process.
- Puts more responsibility on the Title IX Coordinator.
- Requires schools to appoint personnel to very discrete roles in the process.
- Our goal is to give you an overview of the 2000 plus pages of regulations and provide you with the tools to help you comply.

# Statutory Background



- Title IX (enacted 1972) provides:
- “No person...shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”
- Originally understood to apply to equity in sports.
- Title IX does not explicitly refer to or include Sexual Harassment.

# Definition of Sexual Harassment

- The Final Rule defines sexual harassment as conduct on the basis of sex that satisfies one or more of the following:
  - An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct (i.e., *quid pro quo* sexual harassment);
  - Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity; or

N.B.: In the past, OCR's definition was "severe, pervasive or persistent," a much lower standard. The new standard more closely follows the standard adopted by the Supreme Court in Davis and brings the administrative and judicial definitions in line with one and other. The standard differs from that under Title VII (severe or pervasive) to reflect differences in norms between workplaces and schools.

- "Sexual assault" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30).

# What is “on the basis of sex”?

- In June 2020, U.S. Supreme Court determined that “sex” discrimination in employment cases under Title VII includes discrimination based on sexual orientation or gender identity.
- Department of Education issued a Notice of Interpretation in June 2021 stating that it will enforce Title IX’s prohibition on discrimination on the basis of sex to include.
  - Discrimination based on sexual orientation.
  - Discrimination based on gender identity.

# “Education Program or Activity” Defined

- In the K-12 context, an “education program or activity” is defined to include any location, event or circumstance over which the District exercises substantial control over the harasser and the context in which the harassment occurs, e.g., bus, proms, athletic events, overnight trips.
- It can be carried out by use of email, the internet or other technologies, the same as if it were in person.

N.B.: It does not apply to electronic communication over which the District has no control, e.g., private Facebook accounts.

# Actual Knowledge Required

- Actual knowledge of sexual harassment activates a school's obligation to respond promptly, including offering supportive measures, even if a formal complaint is not filed.
- Notice to or knowledge by any employee of allegations of sexual harassment meets the requirement of actual knowledge.
- All employees should be required to report incidents of sexual harassment to the Title IX Coordinator, in addition to any obligations they may have as a mandatory reporter of child abuse or neglect.

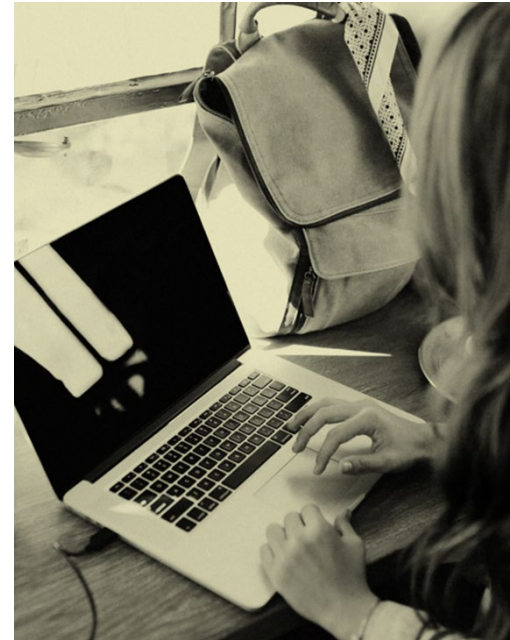


# Notification Requirements

- The regulations require:
  - Recipients to provide notice of their non-discrimination policy and grievance procedure, including how to file a report of sexual harassment to the following groups:
    - students
    - parents and legal guardians
    - applicants for employment
    - unions

# Notification Requirements

- Notice of the Title IX Coordinator's name or title, office address, electronic mail address, and telephone number published prominently on the District's website.
- A notice of non-discrimination (Policy) stating that the recipient does not discriminate on the basis of sex in the education programs or activities that it operates, and that the prohibition applies to employment as well.
- Notice of non-discrimination be published on the District's website and in any handbooks distributed to the above groups.



# Reporting Allegations of Sexual Harassment

- A person other than the victim may report sexual harassment (informal complaint forms are available on District website).
- A report can be made in person, by mail, telephone, or email to the Title IX Coordinator.
- A report can be made at any time, including after hours by telephone, mail or email.



# Informal Complaint

- An informal complaint of sexual harassment may be made by anyone (can be someone other than the subject of the sexual harassment i.e., staff, students, a third party, a parent).
- Forms are available for reporting sexual harassment but may be conveyed orally as well.
- All informal complaints are to be made to or brought to the attention the Title IX Coordinator.
- School employees receiving an informal complaint or who otherwise possess actual knowledge of sexual harassment must notify the Title IX Coordinator. Completion of a written informal complaint form by the reporter or school personnel to whom it was reported is recommended.
- Title IX Coordinator will speak with the individual making the informal complaint to learn facts and identify the subject of the harassment in order to speak with the potential Complainant(s) (subject(s) of reported sexual harassment).
- Informal Complaints may be turned into formal ones only by the Complainant or the Title IX Coordinator.

# Parties to a Formal Complaint



- “Complainant” the person who is the alleged victim of sexual harassment.
- “Respondent” the alleged harasser.

# Grievance Procedures Required

- A grievance procedure must be adopted which incorporates these requirements and processes regarding complaints, investigation, decision, appeal, dismissals, informal resolution, retaliation, recordkeeping and the enumerated rights of the parties and describes the possible range of outcomes and remedies and supportive measures.
- Grievance Procedures are part of the District Policy/regulation and need to be posted on the Board's website.

# Defining Deliberate Indifference

- Must respond promptly to actual knowledge of sexual harassment in a manner that is not deliberately indifferent.
- Deliberate indifference is a response that is clearly unreasonable in light of “known circumstances,” and is considered intentional discrimination by the recipient.
- For a response not to be deliberately indifferent, the Title IX Coordinator must contact each Complainant to discuss supportive measures and explain the process for filing a formal complaint. The response must be prompt and include offering supportive measures.
- Recipient must document why its response was not deliberately indifferent. This is a responsibility of the Title IX Coordinator.
- Recipient must treat the Complainant and Respondent equitably (i.e., must offer supportive measures to both a Complainant and a Respondent).

# Roles and Responsibilities

- Regulations expand the role and responsibilities of a Title IX Coordinator and also require additional school personnel fill distinct roles in the grievance process.
- Roles:
  - Title IX Coordinator
  - Investigator
  - Decision-Maker
  - Decision-Maker on Appeal, if applicable
  - Individual to be trained to conduct informal resolution
- It is important to know the roles/responsibilities assigned to each person so not to overstep and to better understand your role.



# Responsibilities of the Title IX Coordinator

- First point of contact if you become aware of possible sexual harassment
- Oversees District compliance with Title IX
- Receives and reviews informal and formal sexual harassment complaints
- May file a Title IX sexual harassment complaint (even over objection of a Complainant)
- Meets with a Complainant and reviews the Title IX policy/regulation and option to file a formal complaint; may assist with filing the formal complaint
- Discusses supportive measures with Complainant and Respondent (explaining this occurs with or without the filing of a formal complaint)
- Collaborates with school administrators and/or HR about implementation of supportive measures and need for modifications to the measures
- Provides written notice of a formal complaint or directs such notice to be provided to the parties; sends or directs an additional notice if allegations are revised (initial notice must be sent prior to the conducting of an initial interview with a Respondent)
- Monitors compliance with grievance procedures(s) related to Title IX sexual harassment complaint
- May offer parties the option of informal resolution (conducted by trained personnel)

# Responsibilities of the Title IX Coordinator

- May dismiss a sexual harassment complaint with notification of dismissal of a complaint along with explanation of appeal rights to the parties.
- Responsible for overseeing the implementation of remedies related to a finding that sexual harassment occurred.
- Prepares summary of District's actions related to a sexual harassment complaint to demonstrate that the District acted in a manner that is not deliberately indifferent.
- Ensures records are maintained in accordance with law.
- Ensures required notifications are provided including notification of the District's Title IX policy and complaint forms and that the Title IX Coordinator's contact information is placed on the District's website. Ensures that notifications are placed in other locations such as student handbooks and are otherwise distributed to required groups in accordance with law and policy.

# Responsibilities of the Investigator

- Assures no bias or conflict of interest in taking on role
- Contacts parties for initial interviews
- Interviews/re-interviews parties/witnesses
- Gathers appropriate documentation for review
- Plans and conducts investigation
- Secures non-disclosure agreements
- Shares evidence with the parties
- Ensures parties are provided at least ten days to respond to the evidence
- Prepares a Summary of the Evidence Report (may include recommendations and evidence may be attached)
- Provides a copy of the Report to the parties and the Decision-Maker and the Title IX Coordinator

# Responsibilities of the Decision-Maker

- Assures no bias or conflict of interest in taking on the role
- Receives and reviews Investigator's summary report which may include attached evidence
- Notifies the parties of the right to respond to the Investigator's report as well as the right to submit questions to the other party, along with the applicable timelines
- Considers questions submitted by the parties and reviews for relevance; facilitates exchange and response to relevant questions submitted
- Makes findings of fact and credibility determinations, considering the Investigator's report and any additional information from the parties
- Makes a final determination regarding responsibility (either sexual harassment has or has not occurred as alleged)
- Prepares a Written Determination with all required information, including remedies when sexual harassment has been determined to have occurred
- Provides the parties and the Title IX Coordinator with copy of the Written Determination
- Informs parties in writing of their appeal rights and the related deadline for appeal

# Responsibilities of the Appeals Decision-Maker

- Assures no bias or conflict of interest in taking on the role
- Notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties
- Ensure that the Appeals Decision-Maker is not the Title IX Coordinator, Investigator, or Decision-Maker
- Give both parties a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome
- Issue a written decision describing the result of the appeal and the rationale for the result
- Provide the written decision simultaneously to both parties

# Formal Complaint Process

- Only two individuals may file a formal complaint.
- A Complainant may file a formal complaint (by mail, email or other means).
- The Title IX Coordinator may also file a formal complaint. However, the Title IX Coordinator, is not a Complainant or party.
- It is the Title IX Coordinator who decides whether to turn an informal complaint into a formal one and should do so when necessary to avoid a claim of deliberate indifference/may decide to do so even over the Complainant's objection if deemed necessary to avoid deliberate indifference.
- No one else may file a "formal" complaint.
- Grievance Procedures apply once a formal complaint is filed.

# Recipient's Response

- Supportive measures are:
  - non-disciplinary
  - non-punitive
  - individualized services as appropriate
- Some examples include:
  - course modifications
  - schedule changes
  - increased monitoring
- They must be offered even where a formal complaint has not been filed.
- Intent is to restore the status quo without unreasonably burdening the other party.

# Recipient's Response

- The Title IX Coordinator must promptly contact the Complainant (including an employee Complainant) to discuss the availability of supportive measures, and consider the Complainant's wishes in doing so, advise of the right to file a formal complaint and how to do so.
- Respondent to also be offered supportive measures.
- No punitive measures (e.g., discipline, transfer or other sanctions) to be taken until or unless the grievance process is completed and a determination of responsibility is made, i.e., due process.

N.B.: Contacting and providing notice and information to the Complainant in the context of a minor would require notification to the parent or legal guardian.



# Emergency Removal of a Respondent

- Removal of a Respondent on an emergency basis is permissible; must be done properly.
- Removal done to protect an individual from an *immediate* threat to physical health or safety.
- An individualized safety and risk analysis must be performed. Does not require a formal risk assessment.
- Notice and an opportunity to challenge the decision must be provided.

N.B.:The right to remove does not supersede rights of students with disabilities under IDEA or Section 504.

# Formal Complaint: Grievance Procedures

- Both parties must be treated equitably.
- Requires an unbiased process and no conflict of interest on the part of the recipient's personnel (Title IX Coordinator, Investigator, Decision-Maker).
- Unbiased means no predisposition towards or against either of the parties, and no predetermination of the issues.
- Conflict of interest means a personal or professional interest in the outcome, e.g., coach of football team and Respondent is on the team.
- Presumption of innocence for the Respondent.
- Requires training of Title IX Coordinator, Investigators and Decision-Makers.
- Recipient must select either a “preponderance of the evidence” or “clear and convincing evidence” standard for all complaints (done via policy).
- Avoid sex stereotypes.
- Do not assume someone bringing a complaint must be telling the truth.
- Treat all parties with dignity and respect.

# Formal Complaint: Grievance Procedures

- Upon receipt of a formal complaint, a recipient must provide written notice to the parties, which includes:
  - notice of the allegations in sufficient detail (names, conduct alleged, date, location)
  - statement of presumption of innocence (grows out of post-secondary concerns of due process)
  - notice of the right to use an advisor (need not be a lawyer)
  - notice of any provision in any Code of Conduct or similar policy about making false statements or providing false information
- Allow the Parties to prepare a response prior to an *initial* interview.

# Formal Complaint: Grievance Procedures

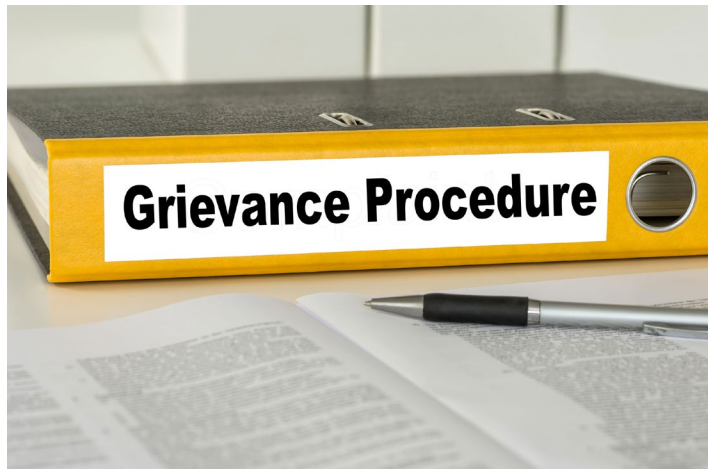
## Mandatory Dismissal of a Complaint

- The complaint must be dismissed if it fails to allege conduct constituting sexual harassment, even if proved, or if the conduct did not occur in a District activity or program or against a person in the U.S.

## Permissive Dismissal of a Complaint

- The complaint may be dismissed if at any time the Complainant notifies the Title IX Coordinator that she/he wishes to withdraw the complaint, or if the circumstances prohibit the recipient from gathering evidence and making a determination, e.g., the parties have left the school.
- If dismissed, notice shall be provided to both parties and the parties' appeal rights explained.

# Formal Complaint: Grievance Procedures



- The burden of proof rests on the recipient (District), not either party.
- Both parties shall be given the opportunity to present witnesses and evidence.
- “Gag orders” are prohibited.
- A party who is invited to an interview or other meeting must be given written notice in advance of the date, time, participants, purpose and location.

# Formal Complaint: Investigation

## Basics: a good school investigation:

- Is thorough.
- Is objective/impartial.
- Is prompt (NOTE: a criminal or outside agency investigation does not alleviate the need, nor should it necessarily delay the conducting of a school investigation; schools have an independent obligation to investigate).
- Is conducted and resolved in accordance with the District's grievance procedures and other guidance including applicable Board policy and state or federal law.
- Does not predetermine the conclusion (e.g., don't say: I don't need to investigate this because I know that no sexual harassment occurred, or this is a bullying complaint not a Title IX complaint).
- Is thoroughly documented and a record of the investigation is maintained as required by law.

# Formal Complaint: Investigation

## Step One: Assess the Complaint.

- What are the facts? What was said or done, and what is a possible motivation for the action?
- What is the age and sex of the parties and what is the relationship between the parties?
- What is the frequency, duration and the severity of the conduct?
- Where did the conduct occur? on school grounds, at a school function or activity, on school transportation, or outside of the school setting? Did it take place face to face, online or via electronic communication?
- If the conduct occurred outside of school, was it in a program or activity of the school; if not, does it implicate any other policy, e.g., disciplinary policy?

# Formal Complaint: Investigation

- Consider whether the complaint is based upon or related to sex, disability, gender, gender identity or expression, race, color, national origin, religion, affiliations or membership in another protected class, whether this is a repeated action, involves students who were or are in a dating relationship (i.e., teen dating violence), or whether it involves a teacher or other adult and a student or is a peer-on-peer interaction.

## Step Two: Review All Relevant Policies

- Refer to Board policies to help in determining the nature of the complaint (refer to the District's policies related to Title IX, 504, Sexual Harassment, Nondiscrimination as well as Bullying/Safe School Climate Plan and other applicable policies).



# Formal Complaint: Investigation

- Determine whether the matter falls under the purview of Title IX and/or some other process, e.g., refer to 504 Coordinator, other Civil Rights Coordinator or the Safe School Climate Specialist and/or a building administrator such as the school principal.
- Be cognizant that a single complaint may implicate more than one policy/law and require separate investigations i.e., Peer –on-peer sexual harassment may require both a Title IX and a bullying investigation and require investigation by both the Title IX Coordinator and the Safe School Climate Specialist.
- More than one investigation may be required for a single complaint. It is up to the District to ensure that the proper investigation(s) is/are conducted.

# Formal Complaint: Investigation

## Step Three: Determine if Any Immediate Action is Required

- Determine whether any immediate action is required, such as a DCF referral, a report or call to a law enforcement agency, a call for emergency assistance for medical treatment or other treatment. (Be mindful of Connecticut's mandated reporter law).
- DCF: Reasonable cause to suspect or believe that a child under eighteen (18) years is being neglected, abused, or placed in imminent risk of serious harm.
- Reasonable cause to suspect or believe that *any person* who is being educated in a school system (other than an adult education student) is a victim of sexual assault or rape, and the perpetrator is a school employee.
- Determine whether the Complainant/victim or accused is a special education or 504 student or receiving any school supports and if a PPT/504 referral is needed.

# Formal Complaint: Investigation

## Step Four: Develop an Investigation Plan

- Decide what witnesses you will interview and in what order.
- Determine what documents you need to gather and review.
- Determine additional actions to take to support/debunk the parties claims.



# Formal Complaint: Investigation

## Step Five: Conduct your investigation

- Prior to conducting interviews, be sure written notice of the filing of a formal complaint has been provided to the parties as required by law.
- Conduct interviews of the parties/witnesses.
- Discuss non-disclosure agreements with the parties as early in the process as possible; preferably during an initial interview.
- Re-interview parties/witnesses, as necessary.
- Provide written notice to the parties of any meetings.
- Review gathered documentation including applicable school surveillance tapes, provided photos, postings or other written materials, class and bus schedules, academic, disciplinary and attendance reports or other school records.
- Keep notes of your steps and observations (do not share personal notes with anyone).

# Formal Complaint: Investigation

## Step Six: Provide both parties an opportunity to inspect and review evidence

- Each side shall be provided the evidence collected/reviewed (witness statements, documentary evidence, etc.), including any exculpatory evidence (e.g., evidence that tends to exonerate the Respondent or is otherwise contrary to the conclusions in the report).
- Such evidence will be provided to the parties who will be provided with sufficient time (at least 10 days) to prepare a written response (if they so choose).
- If a non-disclosure agreement was not previously obtained, request the parties complete one prior to sharing the evidence with them.
- The regulations indicate information provided in the context of the investigation that is “directly related” to the complaint is not a FERPA violation, provided it is not disseminated further. In effect, they are saying due process rights trump FERPA. The regulations explicitly do not prohibit the use of non-disclosure agreements to ensure compliance.

# Formal Complaint: Investigation

## Step Seven:

- After the ten-day period for response has elapsed, the Investigator will issue a written investigation report and provide it to the parties and their advisors, if any, as well as to the Decision-Maker.
- The Investigation Report may include a recommended conclusion (but need not). However, is the responsibility of the Decision-Maker to make factual findings and make a determination regarding responsibility.

## Note:

- Evidence of Complainant's prior sexual activity is not permitted, nor are privileged documents such as doctor-patient privilege, without written consent.

# Formal Complaint: Making a Determination

## Step Eight:

- The Decision-Maker gets the investigation report and evidence.
- The parties may submit to the Decision-Maker a written response to the Investigator's report.
- Before reaching a determination, the Decision-Maker must afford each party an opportunity to submit written, relevant questions that a party wants asked of any party or witness, provide each party with the answers, and allow for additional, limited follow-up questions from each party.
  - The Decision-Maker must exclude irrelevant questions and must explain to the party proposing the question any decision to exclude a question as not relevant.

## Step Nine:

- It is up to the Decision-Maker to make a determination of responsibility (has the Respondent engaged in sexual harassment as alleged in the complaint).
- The Decision-Maker makes a determination as to discipline and remedies. May need to *recommend* rather than make final disciplinary decision if other due process requirements exist. (e.g., expulsion hearing, teacher termination hearing).

# Formal Complaint/Investigation Process

- The Decision-Maker issues a written determination that:
  - identifies the allegations constituting sexual harassment
  - describes the procedural steps taken from receipt of the complaint through the investigation
  - makes findings of fact supporting the determination
  - makes conclusions (sexual harassment did or did not occur)
  - includes a statement of and rationale for each allegation, including a determination of responsibility, any sanctions imposed on the Respondent, and any remedies to restore or preserve equal access to education program or activity to be provided to the Complainant
  - describes the procedure and bases for a possible appeal

N.B.: Title IX Coordinator is responsible for effective implementation of any remedies



# Appeals

- Either party may appeal the decision of responsibility or dismissal of a formal complaint or allegation therein.
- Appeal may only be based upon and granted for the following reasons:
  - 1) a procedural irregularity that affected the outcome;
  - 2) new evidence that was not reasonably available at the time of the determination and could affect the outcome; and
  - 3) conflict of interest on the part of the Title IX Coordinator, the Investigator, or Decision-Maker.
- A district may, but need not, offer an appeal equally to both parties on an additional basis.

# Appeals

- Written notice of the appeal must be provided to both parties, and they shall be provided with an opportunity to submit a written statement in support of/challenging the appeal.
- A written decision shall be issued with respect to the appeal.
- The Decision-Maker on the appeal may not be the Title IX Coordinator, Investigator, or initial Decision-Maker.

N.B.: Requires at least three (3) people from recipient be involved in the formal complaint process.



# Informal Resolution

- Informal resolution may be offered by the Title IX Coordinator if a formal complaint is filed.
- A full investigation need not be conducted as long as written consent of both parties is obtained and the allegation does not involve an adult Respondent and a student Complainant.
- May include a broad range of strategies, including, mediation and restorative justice.
- The above must be spelled out in a “grievance procedure” that is disseminated to staff, students, parents and unions, and placed on the District’s website along with Title IX training materials.
- Must be facilitated by trained personnel.
- Any party has the right to withdraw from the informal resolution process at any time and may resume the formal grievance process.

# Record Keeping

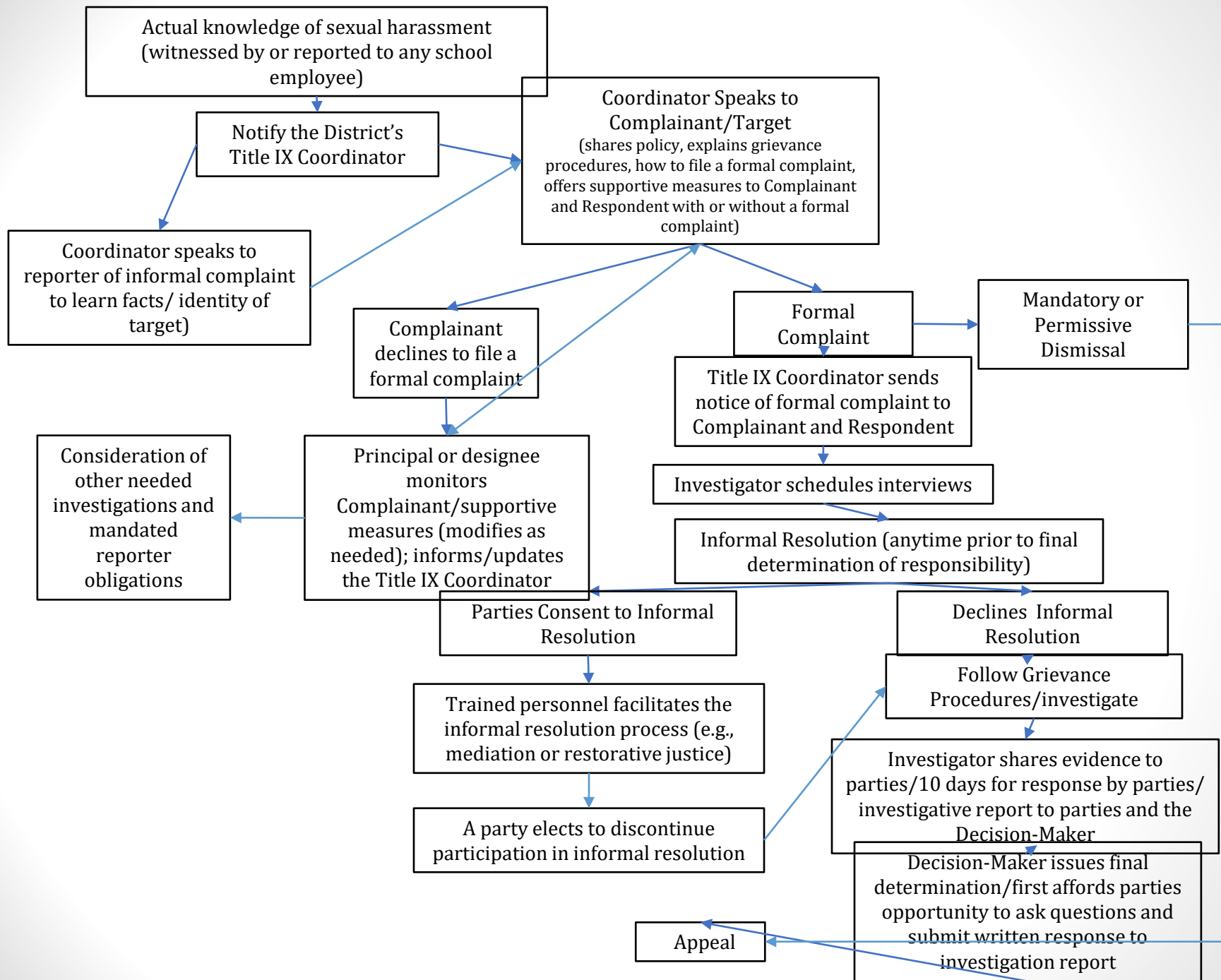
- Recipient must keep for seven (7) years records of each sexual harassment investigation, including, Investigatory records, determinations regarding responsibility, disciplinary sanctions, remedies including supportive measures, appeals, and informal resolution and results.
- Identity of a person who files a complaint or reports sexual harassment must be protected to the extent permitted by law, and except as provided under the regulations, e.g., notice and evidence provided to the Respondent and representative.
- Recipient must keep for seven (7) years any materials used to train Title IX Coordinators, Investigators, Decision-Makers, and any employee designated to facilitate an informal process. Training materials to be posted to the District's website.
- Record to include a statement prepared by the Title IX Coordinator for the file explaining how the District's actions were not deliberately indifferent to the alleged sexual harassment.

# Retaliation Is Prohibited

- Prohibits discrimination by a recipient or any other person against any person because they have participated or refused to participate in a Title IX process, or exercised rights under Title IX.
- Penalties for submitting a false claim is not considered retaliation.

**TOOLS FOR  
NAVIGATING COMPLIANCE  
WITH TITLE IX  
SEXUAL HARASSMENT  
REGULATIONS**





# Title IX Tool Kit

- Board of Education Policy and regulations with grievance procedures.
- Form for filing an Informal Complaint (on the District's website).
- Form for filing a Formal Complaint (on the District's website).
- Form Letter to be sent to the Respondent providing notice of the filing of a formal sexual harassment complaint.
- Form Letter to be sent to the Complainant providing notice of the filing of a formal sexual harassment complaint.



# Title IX Tool Kit

- Form notifying parties of a mandatory or discretionary dismissal of the sexual harassment complaint with an explanation of appeal rights.
- Form notifying parties of the right to appeal a determination of responsibility and attending procedure for appeal.
- Nondisclosure Form for a party.
- Nondisclosure Form for advisor.
- Sample Written Determination of Decision-Maker.

# Scenarios

- What questions does the scenario raise for you?
- Do you need more information? What information?
- What are your first steps?
- Name procedures you will follow in sequential order.
- If the allegations are true, do they constitute sexual harassment?
- Are additional investigations or policies relevant? Or are additional actions required?

# Mason and Liam

Mason and Liam are first-grade boys. One day, Mason touches Liam's private area while the two are in the bathroom. Liam giggles. When he returns to the classroom, he is still giggling and announces to his teacher, "Mason touched my peepee!" Liam's parents call the principal the next day extremely angry about the incident and demand to know what the district is going to do about the matter.

## Linda and Mr. Perry

Linda, the school secretary, complains to the Title IX Coordinator that she is experiencing sexual harassment in the workplace. Specifically, she says that Mr. Perry, the school principal, makes inappropriate remarks to her on a daily basis. She reports that today he told her that she is way too pretty to be with her overweight husband and asks if she ever considered having an affair. She says he regularly boasts about his libido in front of her. Mr. Perry has been well-respected in the community for decades while Linda is known to exaggerate and has poor attendance.

# WHERE CAN I GO FOR MORE INFORMATION:

- [www.ed.gov/titleix](http://www.ed.gov/titleix)
- <https://www2.ed.gov/about/offices/list/ocr/docs/202107-qa-titleix.pdf> (Questions and Answers on the Title IX Regulations on Sexual Harassment (July 2021))

QUESTIONS?

