

TITLE IX



C O N S U L T
LLC

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Today's Training Agenda

- Title IX Fundamentals
- Role and Responsibility of Title IX Coordinator
- Overview of Compliant Title IX Grievance Process and Investigation
- Role of Decision-Maker in Title IX Formal Process
- Appeals of Title IX Findings



Overview:

Title IX Training Fundamentals

- Introduction to Title IX law and regulations
- Education institution's legal obligations under Title IX
- Employees' responsibility to enforce Title IX
- Title IX Roles – Coordinator, Investigator, Decision-Maker, Appeal Officer
- Title IX definitions and grievance process overview
- State law obligations
- Retaliation

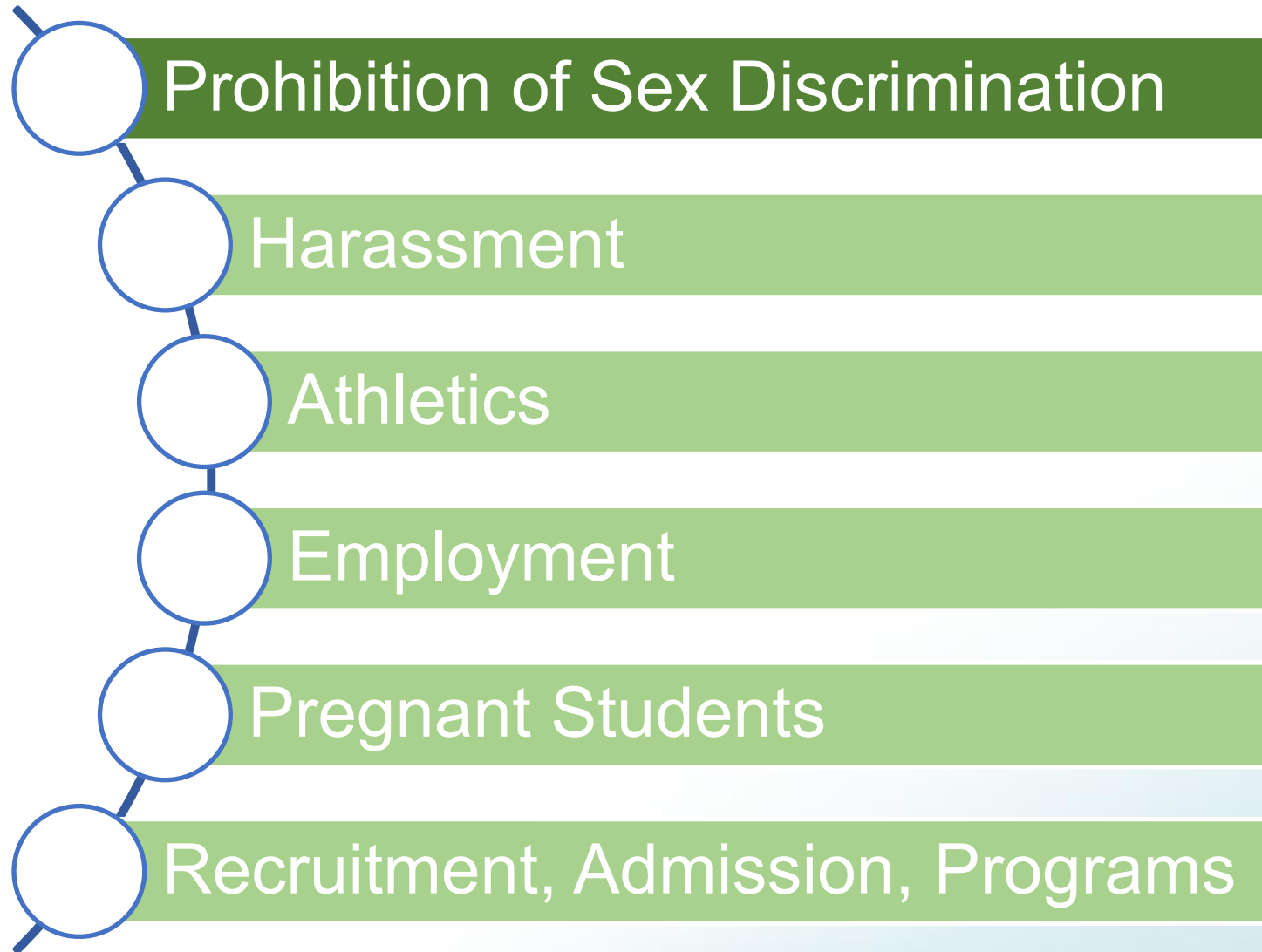


Title IX Law

- No person in the United States 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.
- Enforced through the Department of Education, Office for Civil Rights (OCR)



Title IX Covers and Includes



Rescinded Guidance from OCR
under Obama administration

2015

Title IX Coordinator

2011, 2014, 2016

2017

Q&A on Campus Sexual
Misconduct

BINDING GUIDANCE ON TITLE IX

2001

Regulations on Title IX

2020

Final Rules on Title IX
(effective 8/14/20)

2021

Notice of Interpretation –
sexual orientation/gender
identity

Questions and Answers on
New Regs

1998-1999

Supreme Court decisions on
Title IX

Final Rule on Title IX - effective 08/14/20

- Has the force and effect of law
- Set legal standard under Title IX for K-12 school districts
- Defined Title IX Coordinator's Role
- Clarified parties and other administrative roles in Title IX enforcement at the district
- Defined sexual harassment under federal law
- Described compliant grievance process
 - Due process focus



Title IX – Parties and Administrators

Administration of Claims

Parties

- Complainant – alleged victim/survivor
- Respondent – respond the allegation

- Title IX Coordinator
- Title IX Investigator
- Title IX Decision-maker
- Title IX Appeal Officer
- Title IX Advisor
- Title IX Informal Resolution Officer



LEGAL OBLIGATION

Educational institution must respond in a manner that isn't deliberately indifferent when it has actual knowledge of sexual harassment occurring in the institution's education program or activity against a person in the United States.



Actual Knowledge of Sexual Harassment

- When sexual harassment or allegations of sexual harassment come to the attention of **ANY EMPLOYEE** of a K-12 district, all employees **MUST** report to the **TITLE IX COORDINATOR**
- No employee of the district can promise confidentiality to a party or witness and/or make the decision not to report unless they hold confidential status (ex., licensed mental health counselor)
- Failure to report could lead to an inadequate response
 - Proof of deliberate indifference
 - Legal responsibility for sexual harassment



Title IX Office at School/District

Name

Title IX Coordinator

Office Address

Phone Number(s)

titleixcoordinator@schooldistrict.org



Jurisdiction Requirements

- Occurring in the institution's education program or activity
includes locations, events, or circumstances over which the school exercised substantial control over both the respondent and the context in which the sexual harassment occurred
- Against a person in the United States
- Process includes both mandatory and permissive dismissals



Title IX Sexual Harassment

Under Final Rule on Title IX



Title IX Definition of Sexual Harassment

Defined conduct on the basis of sex and includes:

- Quid pro quo harassment
- Hostile environment harassment
- Sexual assault
- Dating/domestic violence
- Stalking



Title IX Definition of Sexual Harassment, continued

- **Quid pro quo** - An employee who conditions the receipt of an aid, benefit, or service of the district on an individual's participation in unwelcome sexual conduct.
- **Hostile environment** sexual harassment, defined as unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectionably offensive that it effectively denies a person equal access to the school's education program or activity.



Title IX Definition of Sexual Harassment, continued

Sexual Assault

- Rape
- Fondling
- Incest
- Statutory Rape

Dating/Domestic Violence

Stalking



Notice of Interpretation - US Department of Education

- Bostick v. Clayton County
- Prohibition against sex discrimination includes protections for:
 - Sexual orientation
 - Gender identity



Overview of Grievance Process

Initial complaint – Title IX Coordinator

- Report of incident
- Formal complaint process offered
- Supportive measures
- Complaint filed/investigation initiated
- Potential dismissal (Jurisdiction, Allegation)
- Notice of allegations, includes a presumption of innocence

Investigation - TIX Investigator

- Interviews
- Documents reviewed
- Sharing information with both parties and reviewing feedback
- Completing investigative report
- Gathering feedback from parties on report

Decision-making – TIX Decision-Maker

- Evaluate the evidence
- Determine if follow-up questions required
- Issue decision on policy violation and discipline

Impartiality, avoiding bias, conflict of interest, stereotypes

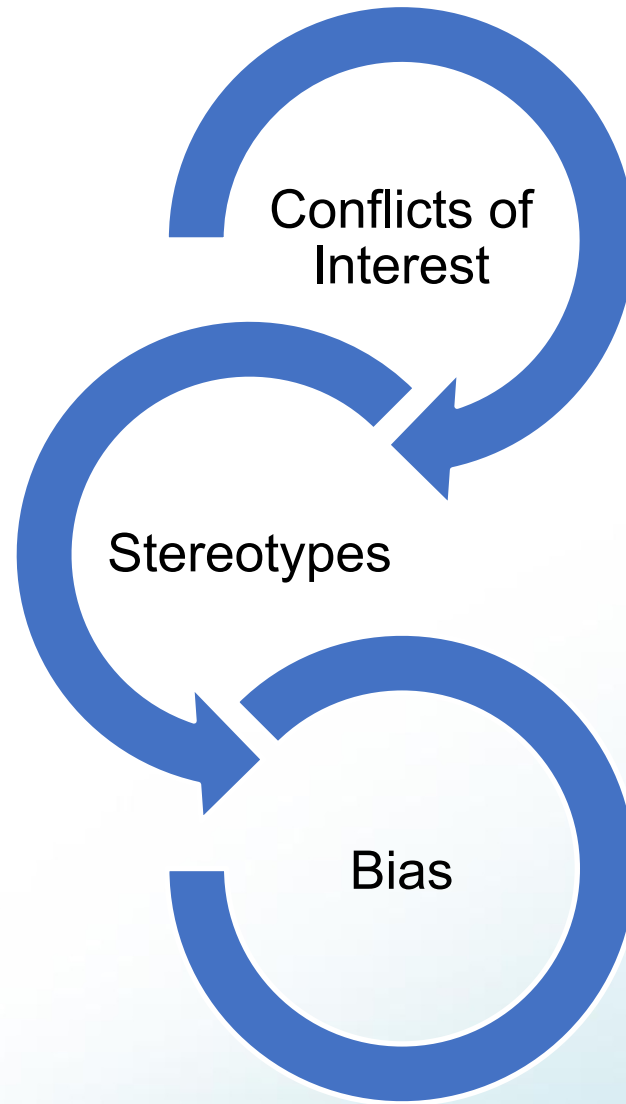


Title IX Ensures Constitutional Protections

- Under Title IX, schools may not restrict the rights afforded under:
 - First Amendment (Free Speech)
 - Fifth Amendment (Protection against Self-Incrimination)
 - Fourteen Amendment (Due Process)



Title IX Process MUST avoid



Title IX Prohibition Against Retaliation

- Prohibition against retaliation for any participant in the Title IX investigation process
- Requires some level of school action



STATE LAW - Sexual Harassment



State Law Distinctions – New Jersey

- Definitions of sexual harassment

Quid pro quo

- implicit or explicit threat that if one does not accede to a sexual demand it will have a negative consequence, either in the sense of a loss of employment or loss of promotion or an unfavorable evaluation.

Hostile environment

- students can be victims of hostile school environment when the harassment is sufficiently severe, persistent or pervasive so as to limit the student's ability to benefit from education.

- Grievance process following an allegation of sexual harassment



Title IX New Regulations Impact District Policies

Review Policies

- Employee policies
- Sexual Harassment
- Nondiscrimination

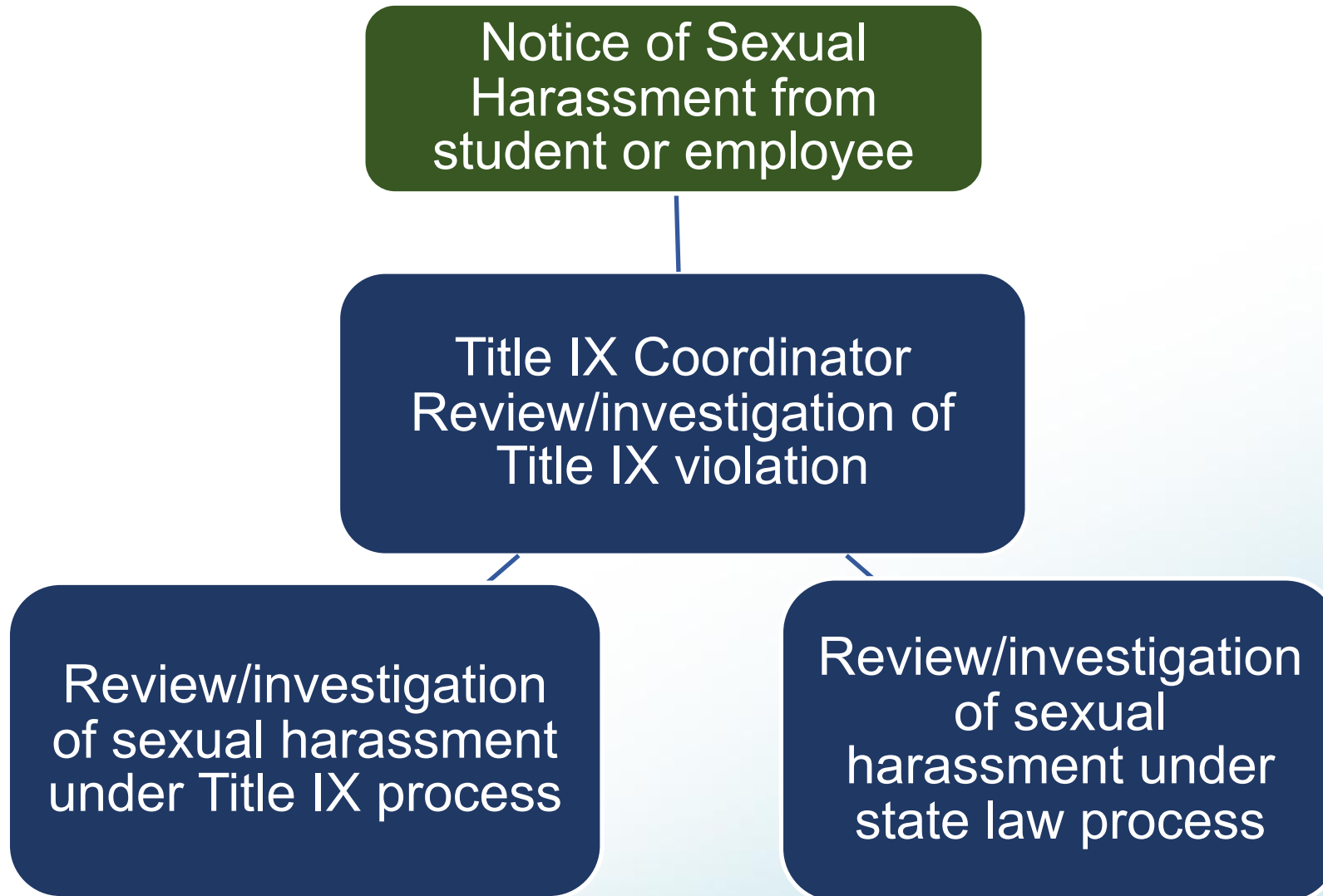
Student Policies

- Sexual Harassment
- Nondiscrimination

Process



Sexual Harassment Process



Fundamentals Quiz



Overview:

Role and Responsibilities of Title IX Coordinator

- Title IX Coordinator Notice
- Title IX Coordinator Responsibilities
 - Coordinate Response
 - Analyze Trends
 - Policies and Process
- Avoiding Bias, Conflicts of Interest, and Bias in Process
- Initial Inquiries
 - Analyzing Actual Notice
 - Questions of Jurisdiction
 - Determination about Removal
- Other compliance issues - complaint files and community outreach



Title IX Coordinator

Name and title

Office address

Email address

Phone number



Title IX Coordinator Information

Must be shared with:

- Students
- Parents
- Employees
- Applicants for admission
- Applicants for employment
- Unions and/or parties to collective bargaining agreements

Must promptly display contact information in each handbook or catalog made available to those persons

Must notify these individuals of non-discrimination

Must include notice of grievance procedure



Title IX Coordinator Responsibilities

- Coordinate the Title IX response on behalf of the school
- Monitor outcomes and identify patterns
- Adoption of Title IX policy and procedure
- Access to relevant data (i.e., participation, budgets)
- Information easily found and in designated publications
- Permitted to conduct investigations
- Permitted to oversee investigations
- Avoiding conflicts of interest, including exclusion from serving as the decision-maker

Appropriate authority, qualifications, training, and time (2015
Guidance - rescinded)



Coordinate the School's Response

- Receive reports of claims and potential claims
- Provide required notices
- Examine and (re-examine) supportive measures
- Determine appropriateness of a potential removal proceeding
- In some instances, act as investigator
- Identify proper decision-maker but NEVER serve as decision-maker
- Decide who will manage an appeal, if necessary
- Coordinate investigation, sharing of information between the parties, final outcome letter, and offering of appeal options
- Ensure proper documentation
- Provide training



Monitor Outcomes and Identify Patterns

Intake

- Formal complaints from allegations
- School sites

Investigation

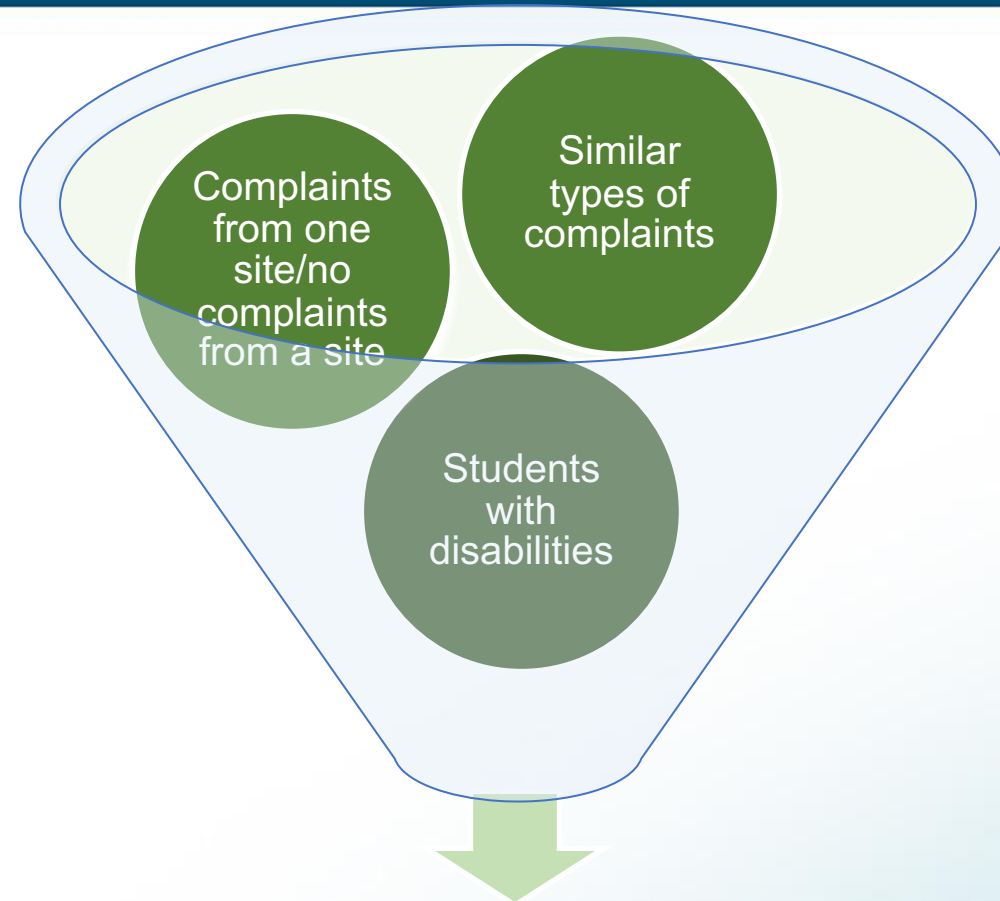
- In-house
- External
- Title IX and state Sexual Harassment

Outcomes

- Timelines
- Policy violations
- Discipline



Potential Patterns



Data analysis for planning purposes



Policy and Procedures Administration

- Review annually
- Take into account the time-consuming board review and approval process
- Set timelines for your process



Other Considerations

- Title IX and state law interaction
- Title IX file review
- Community outreach
 - Climate surveys
 - Focus groups
 - Student/parents special interest groups



Impartiality

- Be neutral – neither pro-Complainant nor pro-Respondent
- Consider the evidence as presented
- Confront and understand bias and not allow it to impact decision
- Maintain open mind as to the potential conclusions



Conflicts of Interest

- Relationship to parties or witnesses
- Professional conflicts
- Personal conflicts
- Actual and perceived



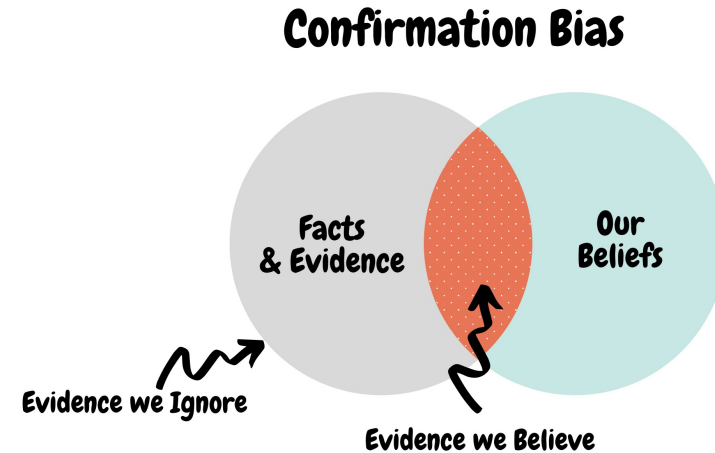
Stereotypes

- “A fixed, over generalized belief about a particular group or class of people.” (Cardwell, 1996)
- Stereotypes around sexual assault
- Stereotypes around sexual harassment
- Complainant and Respondent



Bias

- Conscious/Explicit
 - Discriminatory intent
 - Stated preferences
- Unconscious/Implicit
 - For the most part, most people are unaware of these drivers
 - Developed over a period time and can influence many factors in hearing
 - Short cuts developed by the brain and often play a role in:
 - Immediate response to conflict
 - Often mimics fear responses



Trauma

- Many Title IX causes of action involve trauma
- Title IX Coordinators should understand the impact of trauma on:
 - Reaction to trauma
 - Ability to capture memories
 - Recollection of memories
- Expectations around trauma victim



EXERCISE: Title IX Coordinator Initial Response

- Following initial report,
 - Determine if actual notice was received - offer formal process
 - Analyze jurisdiction
 - Analyze potential grounds for student removal
- Ensure the proper process is followed



Actual Knowledge of Sexual Harassment

- When sexual harassment or allegations of sexual harassment come to the attention of **ANY EMPLOYEE** of a K-12 district, all employees **MUST** report to the **TITLE IX COORDINATOR**
- No employee of the district can promise confidentiality to a party or witness and/or make the decision not to report unless they hold confidential status (ex., licensed mental health counselor)
- Failure to report could lead to an inadequate response
 - Proof of deliberate indifference
 - Legal responsibility for sexual harassment



Jurisdictional Dismissal - Mandatory and Permissive

Mandatory dismissal

- Would not constitute sexual harassment as defined in regulations
- Did not occur in education program or activity
- Did not occur against a person in the U.S.

Permissive dismissal

- Complainant notifies Title IX Coordinator in writing that Complainant would like to withdraw formal complaint or allegations
- Respondent is no longer enrolled or employed by school district
- Specific circumstances prevent the school district from gathering evidence sufficient to reach a determination



Emergency Removal Procedure

- Step 1 – Conduct a prompt individualized safety and risk analysis
- Step 2 – Immediate threat to the safety the physical health or safety of any student or other individual Arising from the allegations of sexual harassment
- Step 3 – Evaluate the applicability of disability laws to the removal decision
- Step 4 – Consider the appropriateness of supportive measures in lieu of an emergency removal
- Step 5 – Provide the respondent with notice and an “immediate” opportunity to challenge the emergency removal



Title IX Grievance Process (TIXGP)



Title IX Grievance Process (TIXGP)

- Respond promptly in a manner that is not deliberately indifferent
- Due process and fundamentally fair procedures to adjudicate the allegations
- Upon notification, supportive measures offered
 - Emergency removal
- Offer of formal process
 - Complainant files or Title IX Coordinator may file
- Both parties receive notice of the allegations
- Both parties participate in investigation and can inspect information gathered
- Separate decision-maker(s)
- Completed in a prompt time-frame
- Retaliation prohibited - designate the retaliation complaint process



TIXGP: Supportive Measures

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent and are designed to restore or preserve equal access to the District's education programs or activities without unreasonably burdening either party, including measures designed to protect the safety of all parties or the District's educational environment, or deter sexual harassment



TIXGP: Offer of Formal Process

- Complainant offered formal process
- Complainant must file and request an investigation
- Wishes of complainant are to be respected



TIXGP: No Formal Complaint Filed

- Title IX Coordinator may decide to proceed with investigation
- Title IX Coordinator does not become Complainant



TIXGP: Informal Resolution

- Trained facilitators
- After formal complaint is filed
- Process must be detailed in writing
- Described to both parties
- Parties agree in writing
- Either party may end informal resolution before a formal agreement is accepted
- Never available when complainant is student and respondent is employee



TIXGP: Notice of Allegations

- Detailed allegations against respondent
- Supportive measures offered to respondent
- No supportive measure can appear disciplinary



TIXGP: Separate Decision-Makers

- Title IX Coordinator may serve as investigator
- Title IX Coordinator may NOT serve as decision-maker
- Hearing panels permitted for K-12s but not required



TIXGP: Investigation

- Investigation gathers relevant and irrelevant information
- All information must be shared with both parties
- Parties have ability to review investigation report and outcome, provide comments/written questions and provide answers and limited follow-up



TIXGP: Decision-Maker

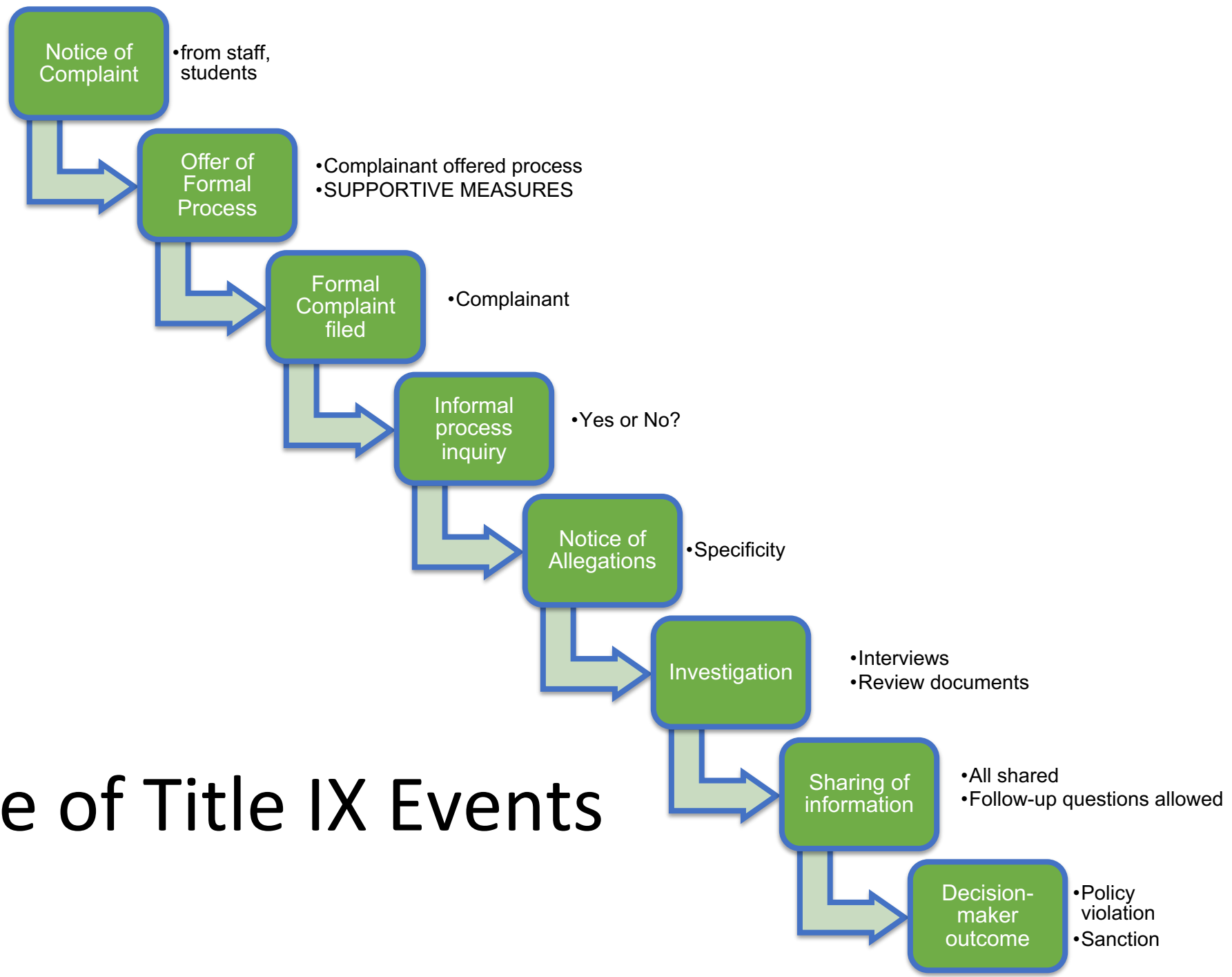
- Decision-maker must determine:
 - Policy violation
 - Discipline
- In K-12, discipline decisions against students with disabilities may require a manifestation determination
 - A **Manifestation Determination** is a process, required by the Individuals With Disabilities Education Act (IDEA 2004), which is conducted when considering the exclusion of a student with a disability that constitutes a change of placement



TIXGP: Appeal

- Procedural irregularity in the Title IX grievance process affected the outcome;
- Newly discovered evidence that was not reasonably available at the time of the determination of responsibility or dismissal that could affect the outcome; or
- Due to a bias or conflict of interest by the Title IX Coordinator, investigator, or decision-maker that affected the outcome.





Sequence of Title IX Events

Review Process Flow Chart



Case Study



Break-Out 1

- Issue spotting
- What is the potential violation?



Overview of Investigation Process

Overview of Grievance Process

Initial complaint – Title IX Coordinator

- Report of incident
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Investigation - TIX Investigator

- Interviews
- Documents reviewed
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Decision-making – TIX Decision-Maker

- Evaluate the evidence
- Determine if follow-up questions required
- Issue decision on policy violation and discipline

Impartiality, avoiding bias, conflict of interest, stereotypes



Investigator Responsibility

- Serve objectively, impartially, without bias
 - Conflicts
 - Stereotypes
- Gather all information related to a claim
- Analyze
 - Relevancy
 - Authenticity
 - Credibility
- Connect to parties and witnesses
- Assist in maintaining legitimacy of the process
- Policy should define the INVESTIGATOR role
 - For Title IX, two options – gather OR fact-finder



Formal Complaint

- Schools are required to investigate formal complaints - filed by a complainant alleging sexual harassment against a respondent and requesting that the school investigate the allegation
 - a complainant must be participating in or attempting to participate in the education program or activity of the school to file formal complaint
- If the complainant does not file a formal complaint, the wishes of the complainant should be respected.
 - Unless the Title IX Coordinator decides to initiate the complaint and it is “is clearly not unreasonable in light of the known circumstances”
 - Title IX Coordinator may file and sign a formal complaint
 - Title IX Coordinator does NOT become complainant



Supportive Measures

- Mandatory obligations include offering “**supportive measures**” to complainant that must be non-punitive, non-disciplinary, and not unreasonably burdensome on the other party
 - GOAL - provide both parties with equal access to their education, protect safety, and deter sexual harassment.
- No action can be considered “disciplinary” against a respondent at this stage.
- Appropriate supportive measures counter allegations of deliberate indifference
- Supportive measures must be revisited frequently and properly documented



Notice of Allegations

- Notice of the allegations of sexual harassment including sufficient details known at the time including the identities of parties, the conduct alleged, and date and location of the incident
- Provided before Respondent's interview
- Allow for sufficient time to prepare a response before any initial interview
- Includes policies alleged to have been violated and must be supplemented if additional allegations arise
- Notice of informal resolution process
- Must include:
 - Respondent is presumed not responsible for the allegation
 - Parties may have an advisor of their choice



Write the Notice of Allegations



Presumptions

- Not responsible until proven to be responsible
- Stereotypes and bias



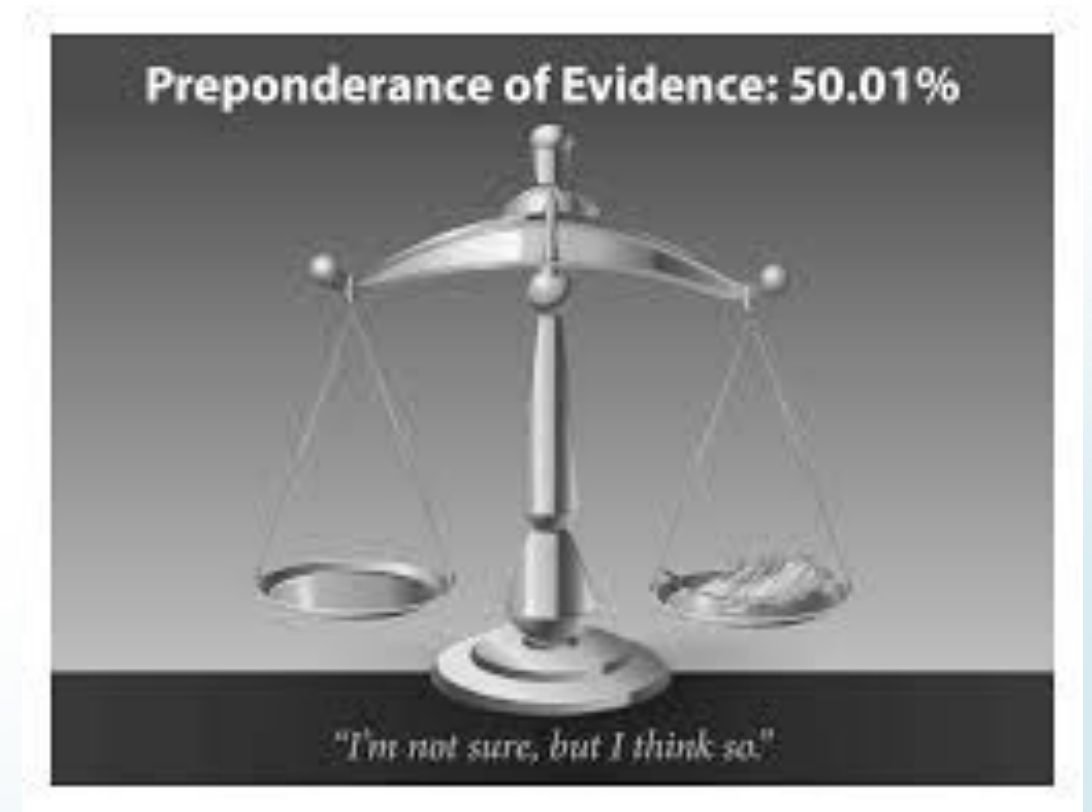
Rape Shield Protections

- Questions and evidence about a complainant's prior sexual behavior are prohibited unless:
 - offered to prove that someone other than the respondent committed the alleged misconduct, or
 - offered to prove consent.



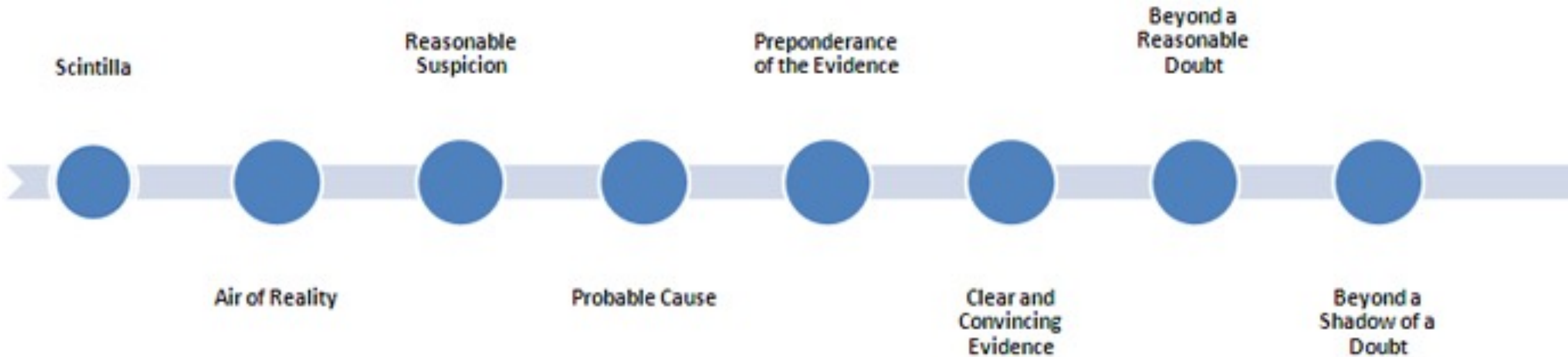
Burden of Proof

- Preponderance of the evidence
- Clear and convincing
- NJ Regulation Guide allows either



Preponderance of the Evidence

Burdens of Proof



Conducting Investigations

Basics



Initial Review

- Formal complaint
- Notice to both parties
- Supportive measures
- Timelines
- Parties (and parents) understand the process
- Other complaints?
 - Criminal matters
 - Similar complaints – consolidation
- Concurrent or parallel investigations
- Record-keeping requirements
- **Documentation at every step!!**



Information Gathering

- Types of information
- Background
- Request information from parties
- Proactively seek information
- Requests and refusals
- Information sharing



Organizing the Investigation



Break-Out 2

- What documentation will you gather?
- Who would you interview? In what order?
- When would enough information be gathered?
- How can you adopt strategies that may help you avoid questions about your report?



Conducting Interviews

- Introduction
- Questioning – time, space, and effect of silence
- Open-ended versus leading questions
- Direct versus indirect evidence
- Sensory recollection
- Note-taking versus audio/video-recording
- Advisors' role
- Investigator should maintain the control the interview
 - Decorum
 - Responses
 - Concluding the interviews
 - “Anything else”



Gathering Documents and Other Evidence

- Emails, texts, photos
- Legal implications
- Support or contradict testimony
- Character evidence



Weighing and Challenging Evidence

- Authentication
- Relevance
- Credibility



Evidentiary Review

- RELEVANCE – Applying to the matter in question; affording something to the purpose (Black's Law Dictionary)
- NOT permitted:
 - Sexual history of Complainant (see Rape Shield exception)
 - Privileged communications
 - Medical documentation
- Not repetitive



Credibility

- Corroboration
- Feasibility
- Motivation for truthfulness/untruthfulness
- Consistent
- Reviewed/coached



Question of Consent

- Age of consent
- Affirmative consent law applies to all institutions of higher education (public and private) in the state
- Important elements of consent
 - Freely given
 - Ongoing
 - Manifested



Impact of Trauma

- Many Title IX causes of action involve trauma
- Investigators and decision-makers must understand the impact of trauma on:
 - Reaction to trauma
 - Ability to capture memories
 - Recollection of memories
- Expectations around trauma victim



Investigation Report

- Convey relevant information about the allegations to the parties and their advisors
- The Department of Education takes no position on the elements required in the report beyond what is required by final regulations
- The investigative report must fairly summarize relevant evidence



Title IX Report and Information Sharing

Before investigation report issued, all evidence shared

Opportunity to question and provide feedback

Investigation report issued and shared

Opportunity to question and provide feedback on investigation report

Final outcome letter issued by decision-maker(s)



Fact Finding from Investigation Report

- Using a preponderance of the evidence standard, I find the following:



Overview: Decision-Maker Training

- Investigation report and information-sharing with the parties
- Types of evidence
- Avoiding decision-making pitfalls
- Evaluating evidence and reaching a conclusion
- Appeal



Overview of Grievance Process

Initial complaint – Title IX Coordinator

- Report of incident
- Formal complaint process offered
- Supportive measures
- Complaint filed/investigation initiated
- Potential dismissal (Jurisdiction, Allegation)
- Notice of allegations, includes a presumption of innocence

Investigation - TIX Investigator

- Interviews
- Documents reviewed
- Sharing information with both parties and reviewing feedback
- Completing investigative report
- Gathering feedback from parties on report

Decision-making – TIX Decision-Maker

- Evaluate the evidence
- Determine if follow-up questions required
- Issue decision on policy violation and discipline

Impartiality, avoiding bias, conflict of interest, stereotypes



Decision-Maker Role

- Review all evidence
- Issues decision relying on relevant, credible evidence
 - Policy violation – using policy definitions
 - Sanction/Discipline, if violation found
- Advises of appeal rights
- Can be more than one decision-maker
- Can never be Title IX Coordinator, Investigator, Appeal Officer
- **REVIEWS ALL EVIDENCE, DECIDES WHAT IS DISPUTE, (RE)EXAMINES THE DISPUTES, AND IN THE CONCLUSION, APPLIES THE STANDARD OF PROOF TO FACTS TO REACH A CONCLUSION ON**



Title IX Report and Information Sharing

Before investigation report issued, all evidence shared



Opportunity to question and provide feedback



Investigation report issued and shared



Opportunity to question and provide feedback on investigation report



Final outcome letter issued by decision-maker(s)



Title IX Hostile Environment Sexual Harassment

Conduct on the basis of sex:

- Hostile environment sexual harassment is defined as: unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectionably offensive that it effectively denies a person equal access to the school's education program or activity.



Opportunity to question

- Parties may submit unanswered questions to decision-maker
 - Some discretion about submitting
 - Limited follow-up – facilitated cross-examination
 - Articulate and document decisions restricting this process
- Decision-maker may have own questions related to the investigation



Weighing and Challenging Evidence

- Authentication
- Relevance
- Credibility



Decision-Maker Documentation



Final Decision Requirements

Decision-maker must issue a written determination regarding responsibility that has to include

- Findings of fact
- Conclusions as to all allegations
- Rationale for reaching the decision
- Sanctions if the respondent is found responsible for policy violations must be included in the written determination.
- Right to appeal

Others to consider:

- Allegations and Procedural Steps
- Categories that highlight compliance with state law



Articulating Your Conclusion in Report

- **As to the allegation that _____, I find by a [preponderance of the evidence/clear and convincing standard] that _____.**
 - Address each allegation
 - Reasons why evidence supports the conclusion
 - Address disputed evidence
 - Details any questions raised by parties after reviewing report
- As a result of these determinations of responsibility, disciplinary sanctions will be imposed on Respondent. Specifically,
 - Insert here what discipline will be imposed on Respondent, if any.
- Additionally, remedies designed to restore/preserve equal access to the school's educational program or activity will be provided to Complainant and coordinated by the Title IX Coordinator.
 - No requirement to specify what those remedies are under Title IX.



Allegation of Hostile Environment Sexual Harassment under Title IX

Allegation:

DEFINITION: unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectionably offensive that it effectively denies a person equal access to the school's education program or activity.

As to the allegation that _____, I find by a preponderance of the evidence/clear and convincing standard that _____.



Allegation of Sexual Harassment – State Law Example

Title IX hostile environment sexual harassment

unwelcome conduct determined by a reasonable person to be so severe, pervasive **and** objectionably offensive that it effectively denies a person equal access to the school's education program or activity (emphasis added).

NJ State Law - hostile environment sexual harassment

students can be victims of hostile school environment when the harassment is sufficiently severe, persistent or pervasive so as to limit the student's ability to benefit from education.



Final Decision

- ✓ Identification of the allegations
- ✓ A description of all procedural steps taken from the receipt of the formal complaint through the determination,
- ✓ The findings of fact supporting the determination;
- ✓ The conclusions regarding the application of the school's code of conduct/school policy/school policies to the facts;
- ✓ Rationale for the result as to each allegation, including a responsibility and any disciplinary sanctions the school imposes on the respondent
- ✓ Other remedies designed to restore or preserve equal access; and
- ✓ The school's procedures and permissible bases for the complainant and respondent to appeal.



Appeals



Appeals under Title IX

- Procedural irregularity in the Title IX grievance process affected the outcome
- Newly discovered evidence that was not reasonably available at the time of the determination of responsibility or dismissal that could affect the outcome
- Due to a bias or conflict of interest by the Title IX Coordinator, investigator, or decision-maker that affected the outcome



Appeal Officer

- Separate individual
- Additional grounds for appeal



Next Steps

- Identify the key members of your Title IX team
 - Coordinator
 - Investigator
 - Decision-makers
 - Appeal officers
- Post today's training on your website
- Consider additional training
- Create and adopt practical documents
 - Forms
 - Checklists



QUESTIONS?

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