

Title IX Training

Title IX Team – Title IX Coordinators, Investigators, Decisionmakers, and Informal Resolution Facilitators



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OVERVIEW OF PRESENTATION



- The District’s obligation to address sex discrimination in its education program or activity.
- The scope of conduct that constitutes Title IX sex discrimination.
- District employee obligation to notify the Title IX Coordinator when you have information about conduct that reasonably may constitute Title IX sex discrimination.
- Obligations and roles of Title IX Team members that serve in specific Title IX roles.
- Discussion of the District’s Grievance Procedures
- District obligations related to a student’s pregnancy or related condition.

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District's Obligation to Address Sex Discrimination



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Obligation to Address Sex Discrimination – Generally

- Districts are required to adopt a Title IX grievance procedure “for the prompt and equitable resolution of complaints of sex discrimination.”
 - Make sure to review your district’s Title IX policy – Nondiscrimination on the Basis of Sex in Education Programs or Activities.
- Whenever a district has knowledge of conduct that reasonably may constitute Title IX sex discrimination (including sex-based harassment) in its education program or activity, it must respond promptly and effectively to address the sex discrimination.
 - A district will have knowledge when any non-confidential employee has information about conduct that reasonably may constitute sex discrimination.
 - Districts must require all non-confidential employees to notify the Title IX Coordinator when they have such knowledge.



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Obligation to Address Sex Discrimination – Confidential Employees

- School counselors, social workers, school psychologists, and school nurses are designated as “confidential employees” and do not have to provide the same notice as general District employees.
 - Confidential employee – District employee whose communications are privileged/confidential under state or federal law.
- The District must notify the public of how to contact its confidential employees and require confidential employees to provide specified information to any individual who informs the confidential employee of conduct that reasonably may constitute sex discrimination while functioning in the scope of their duties.
- The specified information confidential employees must provide to an individual who informs them of conduct that reasonably may constitute sex discrimination:
 - (1) tell the individual of their confidential status under Title IX, including circumstances in which the employee is not required to notify the Title IX Coordinator;
 - (2) explain how to contact the Title IX Coordinator and how to make a complaint; and
 - (3) explain that the Title IX Coordinator may be able to offer and coordinate supportive measures and/or initiate the informal resolution process or investigate under the grievance procedures.

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Obligation to Address Sex Discrimination – Title IX Coordinator

- The Title IX Coordinator is responsible for coordinating the District’s compliance obligations under Title IX.
- Title IX Coordinator also monitor the District’s education program or activity for barriers to reporting information about conduct which reasonably may constitute sex discrimination and take steps reasonably calculated to address such barriers.

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Scope of Conduct that Constitutes Sex Discrimination



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Sex Discrimination – Generally

- “No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any academic, extracurricular . . . or other education program or activity operated by a recipient that receives Federal financial assistance.”
 - “On the basis of sex” includes sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.



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Sex Discrimination Includes Sex-Based Harassment

- Sex-based harassment is a form of sex discrimination.
- The 2024 Regulations outline three forms of sex-based harassment:
 - Quid Pro Quo
 - Hostile Environment
 - Specific Offenses



Sex-Based Harassment – Quid Pro Quo

- An employee, agent, or other person authorized by the District to provide an aid, benefit, or service under the District’s education program or activity explicitly or impliedly conditioning the provision or such an aid, benefit, or service on a person’s participation in unwelcome sexual conduct.



Sex-Based Harassment – Specific Offenses

- Sexual assault
 - Rape, sodomy, sexual assault with an object, fondling, incest, statutory rape.
- Dating violence
 - Violence committed by a person who is/has been in a social relationship of a romantic or intimate nature with the victim.
- Domestic violence
 - Felony or misdemeanor crimes of violence committed by: (1) a current or former spouse or intimate partner (or similarly situated); (2) a person with whom the victim shares a child; (3) a person cohabitating/has cohabitated with the victim as a spouse or intimate partner; or (4) any other person protected under the domestic/family laws under Wisconsin.
- Stalking
 - A course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or safety of others or suffer substantial emotional distress.



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Sex-Based Harassment – Hostile Environment

- “Unwelcome sex-based conduct that, based on the totality of the circumstances, is *subjectively and objectively offensive* and is so *severe OR pervasive* that it *limits or denies* a person’s ability to *participate in or benefit from* the *[district’s] education program or activity.*”
- Fact-specific inquiry that includes consideration of:
 - The degree to which the conduct affected the complainant’s ability to access the district’s education program or activity;
 - The type, frequency, and duration of the conduct;
 - The parties’ ages, roles within a district’s education program or activity, previous interactions and other factors about each party that may be relevant in evaluating the effects of the conduct;
 - The location of the conduct and the context in which it occurred; and
 - Other sex-based harassment in the district’s program or activity.



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Report or Complaint of Sex Discrimination



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Report or Complaint of Sex Discrimination

- When a Title IX Coordinator is notified of conduct that may constitute sex discrimination they must offer supportive measures and notify party(ies) of the Title IX grievance procedures and informal resolution process.
 - If a Title IX complaint is filed, the Title IX Coordinator must initiate grievance procedures and the informal resolution process (if applicable).
 - If no complaint is filed, the parties may still engage in the informal resolution process (if applicable) and the Title IX Coordinator may elect to file a complaint on behalf of the individual subjected to conduct that may constitute sex discrimination.



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Supportive Measures



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Supportive Measures

- Districts must offer and coordinate supportive measures, as appropriate.
- Supportive measures may vary depending on what Districts deem to be reasonably available.
 - Counseling, deadline extensions, course-related adjustments, assigning of escort services, increased security and monitoring of certain areas, restrictions on contact applied to one or more parties, leaves of absence, changes in class or any other activity (regardless of whether there is or is not a comparable alternative), and training and education programming related to sex-based harassment.
- Supportive Measures must not unreasonably burden either party and cannot be imposed for punitive or disciplinary reasons.
- If the complainant or respondent is a student with disabilities, the Title IX Coordinator must consult with one or more members of the student's IEP/504 team to determine how to comply with the IDEA/Section 504 when implementing supportive measures.



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Supportive Measures, con't.

- Supportive Measures may be modified or terminated at the conclusion of the grievance process, at the conclusion of the informal resolution process, or may continue beyond that point.
 - Districts must provide complainant or respondent a timely opportunity to seek modification or reversal of the district's decision to provide, deny, modify or terminate an individual's supportive measures.
 - The impartial employee who hears the appeal must be someone other than the employee who made the determination and must have the authority do modify or reverse the decision.
 - If circumstances change, the district must provide a party with the opportunity to seek modification or termination of supportive measures.



Emergency Removal or Administrative Leave



Emergency Removal/Administrative Leave

- A student may be removed on an emergency basis, provided that the District undertakes a safety and risk analysis and determines that an imminent and serious threat justifies removal.
 - The respondent must be provided with notice and an opportunity to challenge the determination.
- During the grievance procedures, an employee may be placed on administrative leave.



Informal Resolution Process



Informal Resolution Process

- At any point prior to determining whether sex discrimination occurred, the District may offer an informal resolution process (unless there are allegations against an employee engaging in sex-based harassment of a student).
 - The District will determine whether it is appropriate to offer an informal resolution process, but may also decline to offer informal resolution, despite one or more parties' wishes.
- Voluntary consent of the parties is required.
 - Will be conducted by an informal resolution facilitator who may not be the same person as the investigator or decisionmaker.



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Informal Resolution Process, con't.

- Before initiating an informal resolution process, the District must provide notice to the parties that contains the following:
 - (1) the allegations;
 - (2) the requirements of the informal resolution process;
 - (3) that any party has the right to withdraw from the process and proceed under the grievance procedures prior to an agreement;
 - (4) that an agreement would preclude the parties from proceeding under the grievance procedures arising from the same allegations;
 - (5) the potential terms that may be requested or offered in an agreement (including that the agreement is binding only on the parties); and
 - (6) what information the district will maintain and potentially disclose if proceeding under the grievance procedure.
- The Title IX Coordinator must take appropriate prompt and effective steps to ensure that sex discrimination does not recur.



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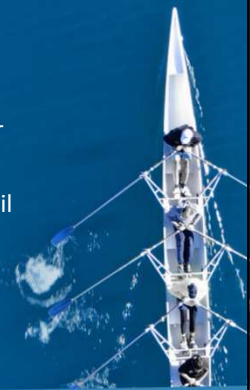
Grievance Procedures



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Grievance Procedures - Generally

- Throughout the entirety, the District must:
 - Treat complainants and respondents equitably
 - Require the absence of conflicts of interest or bias for key roles such as Title IX Coordinator, Investigator, Decisionmaker, Informal Resolution Facilitator, and Appeal Decisionmaker
 - Note: the Decisionmaker may be the same person as the Title IX Coordinator or Investigator.
 - Presume the respondent is not responsible for the alleged sex discrimination until a determination is made at the conclusion
 - Provide reasonable timeframes (see your Policy), with reasonable extensions for good cause with notice to the parties



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Grievance Procedures - Generally, con't.

- Require reasonable steps are taken to protect the privacy of parties and witnesses, provided the steps to not restrict the ability of the parties to obtain and present evidence in preparation for participation in the grievance procedures.
- Require objective evaluation of relevant and permissible evidence (both inculpatory and exculpatory):
 - Impermissible evidence must be excluded – evidence that is protected under privilege or provided to a confidential employee (unless voluntarily waived); treatment records maintained by a physician, psychologist, etc. (unless voluntarily waived); evidence that relates to a complainant's sexual interests or prior sexual conduct, unless the evidence is offered to prove consent or prove another individual committed the alleged conduct.
 - While serving as an investigator, decisionmaker, informal resolution facilitator, or appeal decisionmaker, you must avoid questions that will lead to irrelevant and impermissible evidence and must not seek such evidence.
- Ensure that credibility determinations are not based on a person's status as a complainant, respondent or witness.



Complaint

- The following individuals may make a sex-based harassment Title IX Complaint:
 - A complainant;
 - A parent, guardian, or legal representative on behalf of a complainant; or
 - The Title IX Coordinator on behalf of a complainant.
 - If this option is taken, the individual alleged to be subject to conduct that may constitute sex discrimination is still considered the complainant, not the Title IX Coordinator.
- The following individuals may make a sex discrimination Title IX Complaint:
 - Any the above listed;
 - Any student or employee; or
 - Any person who is participating or attempting to participate in the District's education program or activity at the time of the alleged sex discrimination.



Notice of Complaint

- When the grievance procedure is initiated, the District must provide notice to known parties, which must include:
 - (1) the grievance procedures;
 - (2) the informal resolution process;
 - (3) sufficient information available to allow the parties to respond to the allegations (i.e., conduct alleged, dates/locations, etc.);
 - (4) a statement that retaliation is prohibited; and
 - (5) a statement that the parties are entitled to equal opportunity to access the relevant and permissible evidence.
- Must provide additional notice if additional allegations of sex discrimination arise or if complaints are consolidated.



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Consolidation of Complaints

- The District may consolidate complaints when the allegations of sex discrimination arise from the same fact or circumstances.
 - May consolidate complaints against more than one respondent, by more than one complainant against one or more respondents, or by one party against another party.



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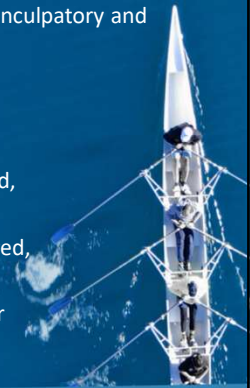
Dismissal of Complaint

- The District may dismiss a complaint in the following situations:
 - If the District is unable to identify the respondent after taking reasonable steps to do so;
 - The respondent is not participating in the District's educational program or activity, and is not employed by the District;
 - The complainant voluntarily withdraws any or all allegations, the TIX coordinator declines to initiate a complaint, and the alleged conduct that remains, if any, would not constitute sex discrimination; or
 - After a reasonable attempt to clarify the allegations with the complainant, the District determines that the alleged conduct, even if proven, would not constitute sex discrimination.
- Upon a dismissal, the District must notify the complainant (and the respondent if they have been notified of the allegations) of the basis for the dismissal and that the decision may be appealed.
 - Again, remember Title IX Coordinators must take appropriate steps to ensure sex discrimination does not continue to recur – this is true even when a complaint is dismissed.



Investigation

- The District must provide adequate, reliable, and impartial investigation of complaints. To do so, Title IX requires that the Investigator:
 - Bears the burden to conduct a sufficient investigation and gather sufficient evidence to make a determination
 - Provide equal opportunity for the parties to present witnesses and relevant and permissible inculpatory and exculpatory evidence
 - Review all evidence and determine what evidence is relevant and permissible
- The Title IX Coordinator will appoint an investigator
 - The "Who" is important – school level, district level, or external?
 - The integrity of the process is paramount – Investigators shall be impartial, objective, unbiased, nonjudgmental, and be able to make appropriate credibility determinations.
 - Determine what questions need to be asked, what evidence needs to be collected and reviewed, and identify what witnesses to interview on top of complainant and respondent interviews.
 - When conducting interviews, ask open-ended unbiased questions, clarify any discrepancies or inconsistencies, and advise that retaliation is prohibited and should be reported.



Investigation, con't.

- The Investigation: Who, What, When, Where, Why, and How Questions
 - Who was involved?
 - What did you witness first hand?
 - What have you heard?
 - What did you hear from the complainant? From the respondent?
 - Where did the alleged conduct occur?
 - When did the alleged conduct occur (date/time)?
 - Were there others involved?
 - Who have you discussed this incident with?
 - Did you report the incident? If so, to whom and what was the result?
 - What documentary evidence exists?
 - Video, text messages, social media
 - How are you aware of the alleged conduct?
 - Anything else you wish to share?



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Investigation, con't.

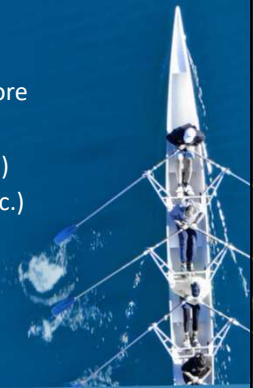
- After the Investigator has completed their investigation, they must provide the parties with an equal opportunity to access the relevant and permissible evidence [or, a description of the relevant and permissible evidence if allowed or required by policy].
 - Per the District's Policy, this means that the Investigator provides the relevant and permissible evidence to both parties and provides the parties with notice of how much time the parties have to provide a written response, if they elect to do so.
 - This notice should include a disclaimer that the parties are prohibited from sharing or otherwise disclosing the evidence obtained solely through the grievance procedure.
 - After the time for a response from the parties has passed, the Investigator will draft their Investigation Report which will be provided to the parties and the Title IX Coordinator, who will assign a Decisionmaker.



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Determination of Whether Sex Discrimination Occurred

- Once the Title IX Coordinator appoints a Decisionmaker, the Decisionmaker must review the Investigation Report and all inculpatory and exculpatory evidence before issuing a written determination.
- After the Decisionmaker is provided with the Investigation Report, they must determine whether credibility is both in dispute and relevant to evaluating one or more allegations of sex discrimination.
 - If it is, the Decisionmaker will need to take steps to adequately assess a party(ies) or witness(es) credibility (*i.e.*, review evidence, conduct additional interviews, etc.)



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Determination, con't.

- Decisionmaker must use the preponderance of evidence standard to determine whether sex discrimination occurred (*i.e.*, more likely than not).
 - If the decisionmaker is not persuaded under the applicable standard, the decisionmaker must not determine that sex discrimination occurred.
- Draft and provide a written Determination of Whether Sex Discrimination occurred to the parties, which includes:
 - Identification of the allegations potentially constituting sex discrimination under Title IX;
 - A description of the procedural steps taken from the receipt of the complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence;
 - Findings of fact supporting the determination;
 - Conclusions regarding the application of the relevant legal standards and the District's code of conduct (*i.e.*, District policies and rules that apply to the party in question);
 - A statement of, and rationale for, the result as to each allegation; and
 - The District's appeal procedures and permissible bases for appeal.
- If sex discrimination occurred, Title IX coordinator must, as appropriate, implement remedies, disciplinary measures, and steps to ensure sex discrimination does not continue or recur.



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Appeals



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Appeals

- Both parties have the right to file a written appeal from a Determination or from the Title IX Coordinator's dismissal of a Complaint (or any part thereof).
- A written appeal must be filed *within 5 days* of a Determination or dismissal and must be based on any of the following that affected the outcome:
 - A procedural irregularity;
 - New evidence that was not reasonably available at the time the decision was made;
 - The Title IX Coordinator, Investigator, or Decisionmaker had a conflict of interest or bias;
 - The decision was substantively erroneous in that the facts did not adequately support the conclusion.
- The parties must be provided with notice in the event of an appeal and a trained Appeal Decisionmaker *will* be selected (cannot be the Investigator or Decisionmaker).
 - As part of the notice, the parties will be informed they have 2 days to provide a statement in support of or challenging the outcome.
- The Appeal Decisionmaker will then issue a written decision which describes the outcome of the appeal and the rationale supporting the outcome.



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Disciplinary Sanctions for Title IX Violations



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Disciplinary Sanctions for Title IX Violations

- Generally
 - Title IX requires that the grievance procedures, including any appeal, be completed before any disciplinary sanctions may be imposed on students or staff.
 - Title IX is a federal law, so even if a student is alleged to have engaged in conduct that could constitute a mandatory removal or expulsion offense under applicable state law, the District must first complete the grievance procedures and determine whether the conduct occurred before it can proceed with disciplinary consequences.
 - Imposed in accordance with Board Policies and Handbooks.
- Students
 - Disciplinary sanctions available for students include, but are not limited to:
 - Suspension or expulsion consistent with Board Policies and 120.13(1), Wis. Stats.
 - Suspension of eligibility to participate in co-curricular activities or other District-sponsored events
 - Restriction or denial of permission to be present on District property or at certain District-sponsored events.
 - Note that Title IX does not change your responsibilities under the IDEA or Section 504 of the Rehabilitation Act of 1973.



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Disciplinary Sanctions for Title IX Violations, con't.

- District Employees
 - Include but are not limited to:
 - Formal reprimand
 - Demotion or other disciplinary reassignment
 - Suspension
 - Contract nonrenewal
 - Termination
 - Restrictions on permission to be present on District property or at any District sponsored event(s) or activity(ies)
- Third Parties
 - Include but are not limited to:
 - Suspension or termination of a District-authorized role (e.g., volunteer)
 - Termination or nonrenewal of third-party contracts
 - Restrictions on permission to be present on District property or at District sponsored events



Serving Impartially in All Title IX Team Roles



Serving Impartially

- All investigators, decisionmakers, informal resolution facilitators, and Title IX coordinators must serve impartially, which includes avoiding prejudice of the facts at issue, conflicts of interest, and bias.
- At every stage, these individuals must remain conscious and aware of these obligations.
- If, at any time, you believe you are unable to serve impartially, you must recuse yourself from your role in the matter and the Title IX Coordinator must find a replacement.



Privacy Considerations



Privacy Considerations

- Privacy – Generally
 - Districts must take reasonable steps to protect the privacy of parties and witnesses during the grievance procedures, so long as such privacy does not restrict the ability of the parties to obtain evidence, consult with family members or counsel, or otherwise prepare or participate in the grievance procedures.
- Prohibited Disclosures of Personally Identifiable Information
 - Districts are prohibited from disclosing personal identifiable information obtained throughout the course of any response to alleged sex discrimination.
 - May disclose such information in the following circumstances:
 - Upon written consent from a person with the legal right to consent to the disclosure;
 - When the information is disclosed to a parent, guardian, or other legal representative;
 - If needed to carry out the purpose of Title IX, including actions taken to address conduct that reasonably may constitute sex discrimination;
 - As required by state or federal law or under the terms or conditions of a federal award; or
 - To the extent disclosure is not otherwise in conflict with Title IX or permitted under FERPA.

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Retaliation



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Retaliation

- Retaliation is prohibited against anyone who, in good faith, has made a report or complaint, or anyone who has assisted, participated, or refused to participate in any manner in a proceeding under the District's Title IX policy.
 - Retaliation includes intimidation, threats, coercion, and discriminatory treatment.
 - Includes peer retaliation.
- Respond to retaliation complaints using same procedures as for sex discrimination complaints.
 - The process and disciplinary sanctions are the same.



Recordkeeping



Recordkeeping

- All records which have been created or obtained in response to a report or complaint of sex discrimination (including documents which establish compliance) must be maintained for seven (7) years.
- The District should consider how to implement a central recordkeeper for all Title IX related records.
 - If the District has more than one Title IX Coordinator, this will likely be the Title IX Coordinator who is designated as the main Title IX Coordinator (*i.e.*, the “quarterback”)



What Are the Unknowns?



Unknowns

- The DOE intends to issue a separate final rule addressing Title IX's applicability to athletics.
 - *i.e.*, athletic eligibility
- DOE did not specifically address use of restrooms and locker rooms
 - BUT – Creation of “de minimis” harm standard for sex separation that is allowed by existing regulations (see also *Whitaker v. KUSD*)
 - Preventing an individual from participating in school consistent with their gender identity causes that person more than de minimis harm.
 - Anti-discrimination requirements apply to bathrooms and locker rooms

Pregnancy or Related Conditions



Pregnancy or Related Conditions

- Discrimination against pregnancy or related conditions is one form of sex discrimination.
 - Includes pregnancy, childbirth, termination of pregnancy, lactation, along with medical conditions or recovery associated with those.
- A District must not adopt or implement any policy, practice, or procedure concerning a student's current, potential, or past parental, family, or marital status that treats students differently on the basis of sex.
 - It is not prohibited discrimination to offer separate or alternative educational programs that are comparable to those offered to students who are not pregnant.



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Pregnancy or Related Conditions, con't.

- If a District employee is informed by a student (or a person with a legal right to act on behalf of the student) of a student's pregnancy or related condition, the employee must promptly provide the person with the Title IX Coordinator's contact information and inform the person that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to the District's education program or activity.
- Once a student (or a person with a legal right to act on behalf of the student) notifies the Title IX Coordinator of the student's pregnancy or related conditions, the Title IX Coordinator must:
 - (1) Inform the student, and if applicable, the person who informed the Title IX Coordinator of the student's pregnancy or related conditions (if that person has a legal right to act on behalf of the student) of the District's obligations under Title IX (including the prohibition of relaying personally identifiable information) and provide the District's notice of nondiscrimination;



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Pregnancy or Related Conditions, con't.

- (2) Coordinate individualized reasonable modifications to prevent sex discrimination and ensure equal access to the District's education program or activity;
 - The District must consult with the student in making this determination.
 - The student has discretion to accept or decline each reasonable modification.
 - Reasonable modifications include breaks during class to express breast milk, breastfeed, attend pregnancy or related conditions health needs (*e.g.*, eating, drinking, using the restroom), intermittent absences to attend medical appointments, access to online or homebound education, schedule or course changes, extensions of time for coursework or testing, allowing a student to sit, stand, or keep water nearby, counseling, changes in physical space or supplies, elevator access, etc.
- (3) Allow the student to voluntarily access any separate and comparable portion of the District's education program or activity; and



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Pregnancy or Related Conditions, con't.

- (4) Allow the student to voluntarily take a leave of absence to cover, at a minimum, the period deemed medically necessary.
 - If the District has another leave of absence policy that allows a greater amount of time off, the District must allow the student to follow that policy if the student chooses.
 - To the extent it can, the District must treat pregnancy or related conditions in the same manner as other temporary medical conditions.
 - When the student returns they must be reinstated to the academic status (and extracurricular status, as practicable) the student held when the leave began.



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Pregnancy or Related Conditions, con't.

- Lactation Space
 - The District must ensure that the student can access a lactation space that is clean, shielded from view, free from intrusion, and may be used by the student for expressing breast milk or breastfeeding, as needed.
 - Cannot be a bathroom.
- Medical Documentation
 - The District must not require supporting documentation unless it is necessary and reasonable to determine whether to take the actions discussed, including making reasonable modifications.
 - The District must not require to provide medical certification that the student is physically able to participate in the District's educational program or activity unless:
 - The certified level of physical activity or health is necessary for participation in that program or activity;
 - The District requires such certification from all students participating in that program or activity; and
 - The information obtained is not used as a basis for sex discrimination.



Title IX Training




Title IX: Training

- **All Title IX Coordinator(s) and designees.**
 - Including and in addition to all the above training requirements, the Title IX Coordinator and any designees must be trained on their specific responsibilities, the school's recordkeeping system, and any other training necessary to coordinate the school's compliance with Title IX.
- **All investigators, decisionmakers, and other persons who are responsible for implementing the school's grievance procedures or appropriate supportive measures**
 - Including and in addition to the training requirements applicable to all employees, and to the extent the following is related to their duties, all investigators, decisionmakers, and other appropriate persons must be trained on: (i) the school's obligations under the Final Regulations; (ii) the school's grievance procedures; (iii) how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias; and (iv) the meaning and application of the term "relevant" in relation to questions and evidence, and the types of evidence that are impermissible regardless of relevance.

Title IX: Training

- **All facilitators of informal resolution process**
 - Including and in addition to the training requirements applicable to all employees, all facilitators of an informal resolution process must be trained on the rules and practices associated with the school's informal resolution process and on how to serve impartially, including by avoiding conflicts of interest and bias.
- **All employees**
 - All employees must be trained on: (i) the school's obligation to address sex discrimination in its education program or activity; (ii) the scope of conduct that constitutes sex discrimination under Title IX, including the definition of sex-based harassment; and (iii) all applicable notification and information requirements under the Final Regulations.



Hypotheticals

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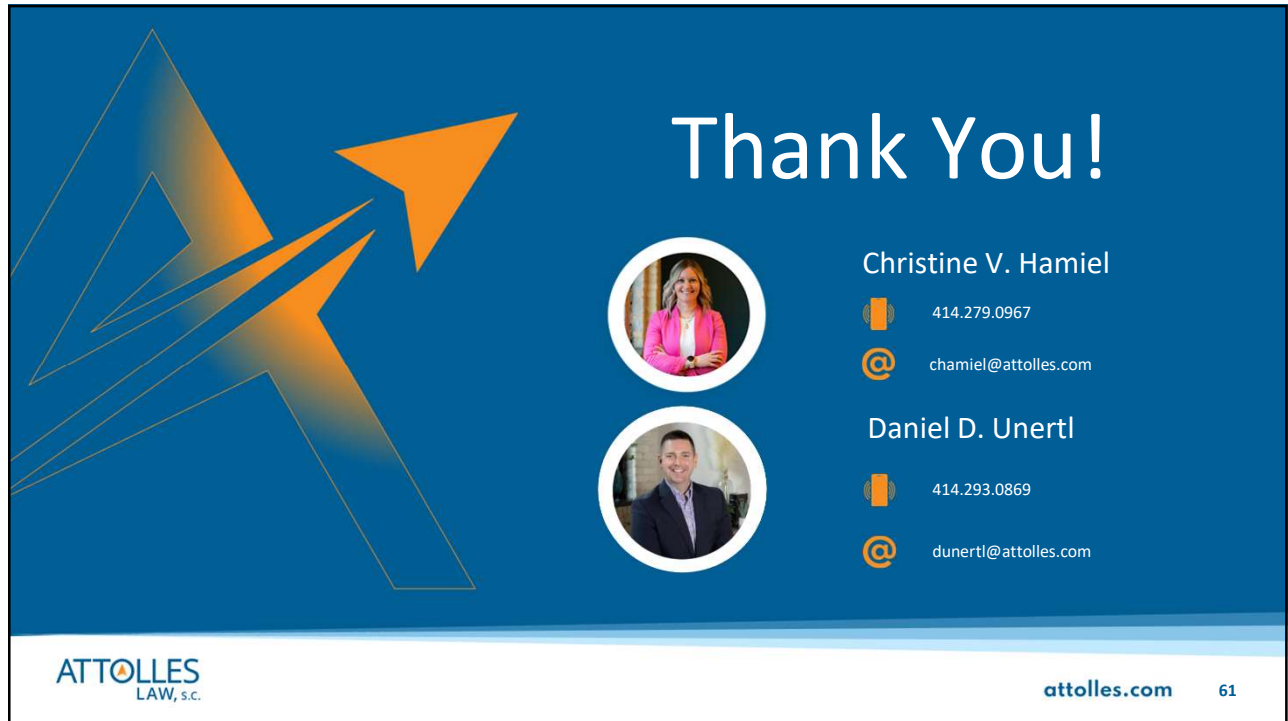


Q&A

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LAW, S.C.

attolles.com

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Thank You!

Christine V. Hamiel
414.279.0967
chamiel@attolles.com

Daniel D. Unertl
414.293.0869
dunertl@attolles.com

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LAW, s.c.

attolles.com 61