

# Title IX Sexual Harassment Training

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**Cecil County Public Schools**

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# Agenda

- A brief history of Title IX and why revisit it today.
- CCPS Title IX Policy & Procedure
- Key Definitions
- Overview of the Title IX Grievance Procedure
- Hypotheticals
- Questions

# Title IX

## A brief history

### History of Title IX Regulations – Pre- 2020 Amendments

- Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex, including sexual harassment, in education programs and activities.
- This law applies to all educational institutions receiving federal funds.
- The DOE first issued Title IX regulations in 1975, which generally required that recipients:
  - 1) publish a notice of nondiscrimination;
  - 2) maintain grievance procedures to resolve complaints of sexual harassment/discrimination; and
  - 3) designate a Title IX coordinator.

# Title IX

## A brief history

### History of Title IX Regulations – Pre- 2020 Amendments

- Until 2020, the regulations did not include specific requirements related to sexual harassment.
- Instead, OCR issued guidance through DCL's & Q&A's establishing standards for administrative liability. OCR Guidance shifted with the political winds.
- Also, a long line of federal court cases (most notably, the U.S. Supreme Court's decisions in *Gebser v. Lago Vista Independent School District* and *Davis v. Monroe County Board of Education*), established the definitions and standards for civil liability of educational institutions under Title IX.
- The standards set forth by the courts were typically much higher than those set forth in OCR guidance.

# Title IX

## A brief history

- In May 2020, the U.S. Department of Education issued regulations to implement Title IX which, for the first time, set forth requirements for the investigation and resolution of complaints of sexual harassment in education programs and activities.
- The DOE's guiding principles for the 2020 rulemaking included:
  - **Clarity:** Improve clarity and transparency of the requirements for how schools respond to allegations of sexual harassment
  - **Supporting Complainants:** Ensure that complainant receives supportive measures to preserve access to education and protect student and employee safety.
  - **Due Process:** Ensure that respondent is afforded due process and not found responsible until a determination of responsibility is made.
  - **Fair Grievance Process:** Ensure *both* parties are treated fairly during the grievance process – equal treatment on the basis of sex, free speech, due process. Equal rights to review evidence, respond, appeal, etc.
  - **New Definitions:** Impart standards articulated by the Supreme Court in *Gebser/Davis* on the administrative process – i.e., definition of sexual harassment.

# Title IX

## A brief history

### History of Title IX Regulations – Post 2020 Amendments

- In 2024, the Biden administration promulgated amendments to the 2020 version of the regulations promulgated by the Trump administration.
- The 2024 regulations expanded the scope of sex-based harassment, lowered the bar for what constitutes harassment, provided flexibility in the grievance process to account for variations in school size and administrative structures, prohibited discrimination based on LGBTQ students.
- **On January 9, 2025, a federal district court issued a decision vacating the 2024 Final Rule. Consistent with the court's order, the 2024 Title IX regulations and these resources are not effective in any jurisdiction.**
  - **Why – expanded scope of discrimination to include gender identity; expanded definition of sexual harassment to include conduct that is both objectively and subjectively offensive, among other changes, exceeded scope of rulemaking authority.**
- **Revert back to 2020 version of Title IX Regs**

# CCPS Policy and Procedure re Title IX

- CCPS Policy AC – “Nondiscrimination and Title IX”
- Available on CCPS website on Board Docs.
- Applies to nondiscrimination generally and Title IX sexual harassment
- Title IX coordinator serves as point of contact for report of “any form of harassment”
  - Adult contact – Executive Director of HR and Staff Relations
  - Student Contact – Coordinator of Student Services

# CCPS Policy and Procedure re Title IX

- Title IX Roles in CCPS
  - Title IX Coordinator (Adults): Dr. Theodore Boyer
  - Title IX Coordinator (Students): Kyle Longeway
  - Investigators
    - Students: Gina Pucci, Kim Sands, Whitney Middlemas, Jim Leitgeb, Catrina Long
    - Staff (mediator/investigator): Kyle Longeway, Gretchen Zahn
  - Decision Maker:
    - Students: John Roush
    - Staff: Joanna Zimmerman
    - Summer Hodgson
  - Appellate Decision Maker: Dr. Robert Buckley

# CCPS Policy and Procedure re Title IX

## Definition of Sexual Harassment under CCPS Policy:

- Any of the following conduct on the basis of sex constitutes sexual harassment:
  - A school employee conferring an educational benefit or service upon a person's participation in unwelcome sexual conduct (often called "*quid pro quo*" 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 school's education program or activity (\*note = *Gebser/Davis* Framework); or
  - Sexual assault, dating violence, domestic violence, or stalking.

# Examples of Sexual Harassment

- Examples of sexual harassment include, but are not limited to:
  - Offensive language (epithets, dirty jokes, derogatory comments, or slurs of a sexual nature) communicated verbally or in writing, including electronic formats
  - Visual harassment such as derogatory posters, photography, cartoons, drawings, clothing, or gestures
  - Offensive touching or impeding or blocking a person's physical movement
  - Making unwelcome sexual contact
  - Spreading rumors about or evaluating someone for their looks or sexual behavior
  - Taunting or ridiculing someone because of perceived or actual sexual orientation
  - Pressuring someone for sexual activity

## Scope of Title IX – CCPS Programs or Activities

- **“Education program or activity”** includes locations, events, or circumstances over which CCPS exercises **substantial control over both the respondent and the context in which the sexual harassment occurred**. Includes:
  - Academic, educational, extracurricular, athletic, and other programs or activities of schools, regardless of the location (within the United States);
  - Online activity that occurs on computer and internet networks, digital platforms, and computer hardware and software owned or operated by, or used in the operations of CCPS
  - Off-campus and/or online sexual harassment? Depends on the factual circumstances of each case.

## More Key Definitions in Title IX Grievance Procedure

- **Complainant** – An individual who is alleged to be the victim of conduct that could constitute sexual harassment
- **Respondent** - An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment
- **Preponderance of the evidence** - evidence which is of greater weight or more convincing than the evidence to the contrary; evidence which shows that something is more likely than not to be true or to have occurred. = 50.1%

# More Key Definitions in Title IX Grievance Procedure

**Formal Complaint** means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that CCPS investigate the allegation of sexual harassment

- May be **filed with the Title IX Coordinator** by mail or by electronic mail
- May be a document or electronic submission (such as electronic mail)
- Contains the complainant's physical or digital signature (indicates that the complainant is the person filing the formal complaint)
- Third parties may **not** file formal complaints
- Title IX Coordinator may sign a formal complaint based upon a third party complaint or based upon an informal complaint by a complainant (does not make the Title IX Coordinator a party in grievance process)
- The Title IX Coordinator may sign a formal complaint over a complainant's objections - ensures that CCPS does not respond with deliberate indifference to sex discrimination, including sexual harassment, in its programs and activities

# General Response to Complaints of Sexual Harassment

**Reporting:** *All* members of the school community must promptly report sexual harassment to the Title IX Coordinator. Why?

- Maximizes the CCPS's ability to obtain evidence; Identify potential witnesses; Conduct a thorough, prompt, and impartial investigation; Take prompt corrective action;
- Delay may result in the loss of relevant evidence and witness testimony, impairing CCPS's ability to respond and take appropriate action.
- When in doubt, report!
- CCPS employees in receipt of a report of sexual harassment must refer the report to the Title IX coordinator by providing written notice with as much detail about the alleged incident as possible.
- *See* Procedure ACAA-EA – Sexual Harassment Reporting Form, Available on Board Docs.



Book	CCPS Policies and Regulations
Section	A - Foundations & Basic Commitment
Title	SEXUAL HARASSMENT REPORT FORM
Code	ACAA-EA
Status	Active
Last Reviewed	October 1, 2019

Related Entries: AC-RA, ACAA, ACAA-RA  
Office: Superintendent of Schools

## SEXUAL HARASSMENT REPORT FORM

All employees associated with this school system are expected to conduct themselves at all times so as to provide an atmosphere free from sexual harassment. Any person who engages in sexual harassment while acting as a member of the Cecil County Public Schools will be in violation of this policy. Conduct that is harassing to other employees is prohibited and will not be tolerated.

Complainant  
Home Address  
Work Address  
Home Phone Work Phone

Date of Alleged Incident(s)

Name of person you believe sexually harassed you

List any witnesses that were present

Where did the incident(s) occur?

Describe the incident(s) as clearly as possible, including such things as: what force, if any, was used; any verbal statements (i.e., threats, requests, demands, etc.); what, if any, physical contact was involved; what did you do to avoid the situation, etc. (Attach additional pages if necessary.)

This complaint is filed based on my honest belief that **[name of person]** has sexually harassed me. I hereby certify that the information I have provided in this complaint is true, correct, and complete to the best of my knowledge and belief.

# General Response to Sexual Harassment CCPS Procedure AC-RA

**Role of the Title IX Coordinator:** oversee all complaints, identify and address patterns/systemic problems, point of contact for reports.

## **Title IX Coordinator Response after receiving report:**

- Promptly and confidentiality contact complainant to discuss options, including:
  - Availability of supportive measures (regardless of whether formal complaint filed, consider wishes of complainant)
  - Right to file complaint to initiate investigation
  - Process for filing complaint (provide copy of AC-RA and ACAA-EA)
- Promptly and confidentiality contact respondent to discuss availability of supportive measures

# General Response to Sexual Harassment CCPS Procedure AC-RA

## What are Supportive Measures in CCPS?

Supportive measures are free, individualized services designed to restore or preserve equal access to education, protect safety, or deter sexual harassment, not disciplinary or punitive, and without unreasonably burdening any other person. Examples of supportive measures may include:

- Counseling;
- Extensions of deadlines or other course-related adjustments;
- Modifications of work or class schedules;
- Campus escort services;
- Leave of absence;
- Increased security or monitoring of certain parts of campus; and/or
- Mutual restrictions on contact between individuals.

Cecil County Public Schools will keep confidential any supportive measures provided to the extent it does not impair Cecil County Public Schools' ability to provide the supportive measure. The Title IX Coordinator is responsible for coordinating the effective supportive measures.

# General Response to Complaints of Sexual Harassment

## Equitable treatment of the parties

- Both the complainant and respondent must be treated equitably
- Supportive measures will be offered to both complainants and respondents
- The formal grievance process must be followed before imposing any disciplinary sanctions against a respondent

# General Response to Complaints of Sexual Harassment

## Emergency removal of students

- Removal of a student respondent on an *emergency* basis provided CCPS:
  - Undertakes an individualized safety and risk analysis;
  - Determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal; **and**
  - Provides the respondent with notice and an opportunity to challenge the decision immediately following the removal in an informal hearing with the Superintendent or designee.
- **Not** an appropriate action to address emotional or mental health needs, which should instead be addressed by supportive measures.
- Consider Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act
- Emergency removal from an extracurricular activity is included under this section.
- Open issue – interplay between emergency removal and ED § 7-305 and COMAR 13A.08.01.11

# General Response to Complaints of Sexual Harassment

## **Emergency Removal of Staff (i.e., Administrative leave)**

- Subject to applicable education laws and collective bargaining agreements, CCPS may place an employee on administrative leave during the pendency of the Title IX grievance process
- Placement of any employee on such administrative leave must be made in accordance with other applicable laws, including but not limited to Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act.
- Consult with Human Resources or the Superintendent

# General Response to Complaints of Sexual Harassment

## • Suspected Child Abuse/Neglect or Crime

- If the alleged conduct involves suspected child abuse or neglect, the Title IX Coordinator shall notify appropriate social service and law enforcement agencies and shall suspend the local investigation until the outside agency/agencies have completed the evidence gathering process
  - CCPS should implement appropriate interim steps during an outside agency's investigation to provide for the safety of the respondent and the school community and the avoidance of retaliation
- If the alleged conduct involves a potential crime, the Title IX Coordinator shall notify law enforcement and discuss whether the local investigation should be suspended pending the completion of law enforcement's investigation
- Follow existing CCPS JHG and Procedure JHG-EA, JHG-RA governing reporting suspected child abuse/neglect.

# Grievance Process in CCPS Procedure AC-RA

## Summary of CCPS Grievance Process

### *CCPS will:*

- Prior to the interview of the respondent, provide both parties with written notice of the process, the allegations, presumption of innocence, right to an advisor, equal opportunity submit, inspect, and review evidence.
- Provide written notice of the date, time, location, participants, and purpose of all hearings, interviews, or other meetings, with sufficient time for the party to prepare, and provide opportunity to inspect and review evidence
- Provide parties with meaningful opportunity to respond to the evidence
- Provide an investigative report on the allegations of the formal complaint to parties and allow 10 calendar days to respond to the report in writing. Consider response before finalizing the investigative report.
- Provide final investigative report to parties with another 10 calendar days before determination or hearing
- Temporary delays are permitted only for good cause. Good cause can include law enforcement activities, the absence of a party or witness, the absence of a party's advisor of choice, or the need to provide language assistance or accommodations of disabilities.
- Protect privacy of parties by requiring a party's written consent before using the party's medical, psychological, or similar treatment records during the grievance process.

# Grievance Process in CCPS Procedure AC-RA

## Summary of CCPS Grievance Process

### *CCPS will:*

- Not use, and will not allow parties to use, information protected by a legal privilege.
- Objectively evaluate relevant evidence, including inculpatory and exculpatory evidence,.
- Not make credibility determinations based a person's status as a complainant, respondent, or witness.
- Apply presumption of innocence to respondent
- Bear burden of proof and apply preponderance of the evidence standard
- Either hold a hearing or allow parties to submit relevant written questions for other parties/witnesses to answer prior to determination of responsibility
- If hearing is held, only allow advisors to cross examine other parties/witnesses,
- Decision maker will not make inferences about determination of responsibility based on absence of party or witness
- Allow hearing to be held virtually, in person, allow separate rooms

# Grievance Process in CCPS Procedure AC-RA

## Summary of CCPS Grievance Process

### *CCPS will:*

- Reasonably accommodate individuals with disabilities during the grievance process
- Determine relevance of question by party's advisor before witness or party must answer
  - Questions and evidence about a complainant's prior sexual history are not relevant, with two limited exceptions:
    - Where such information is offered to prove that someone other than the respondent committed the alleged sexual harassment; or
    - It relates to sexual behavior between the complainant and respondent offered to prove consent.
- Create an audio or audiovisual recording, or transcript, of any hearing, and make it available to the parties for inspection and review.

# Grievance Process in CCPS Procedure AC-RA

## **DECISION-MAKER AND DETERMINATION OF RESPONSIBILITY:**

- Decision-Maker:
  - Cannot be the same person as the investigator or Title IX Coordinator.
  - Must be free from conflict of interest or bias
  - Has received training
  - Will objectively evaluate relevant evidence
  - Will reach conclusion about whether respondent is responsible for sexual harassment
  - Will weigh evidence according to preponderance of evidence standard

# Grievance Process in CCPS Procedure AC-RA

## **DECISION-MAKER AND DETERMINATION OF RESPONSIBILITY:**

- Written determination will be sent to both parties simultaneously to the parties, along with information regarding how to appeal the determination.
- The decision-maker's written determination will include the following:
  - The policy that was violated;
  - A description of the procedural steps that were taken by Cecil County Public Schools;
  - A findings of fact section;
  - A section of conclusions after applying the facts to the policy that applies;
  - A statement and rationale for the ultimate determination of responsibility;
  - Any disciplinary sanctions that will be imposed on respondent and remedies provided to Complainant;
  - A statement and rationale for any remedies for the complainant, addressing how those remedies will restore and preserve equal access; and
  - A statement of Cecil County Public Schools' procedures that the parties have a right to appeal the initial determination regarding responsibility, and the permissible bases for appeal.

# Grievance Process in CCPS Procedure AC-RA

## **DECISION-MAKER AND DETERMINATION OF RESPONSIBILITY:**

- If a respondent is found responsible for sexual harassment, Cecil County Public Schools will effectively implement remedies for a complainant designed to preserve or restore equal access to the school's education program or activity.
- A complainant's remedies can be disciplinary against the respondent and can range from a disciplinary referral to a recommendation for expulsion depending on the circumstances.
- Supportive measures such as the following may also be implemented:
  - Counseling;
  - Extensions of deadlines or other course-related adjustments;
  - Modifications or work or class schedules;
  - Campus escort services;
  - Leave of absence;
  - Increased security or monitoring of certain parts of campus; and/or
  - Mutual restrictions on contact between individuals (if there is a determination of sexual harassment, a no-contact restriction may be implemented).

# Grievance Process in CCPS Procedure AC-RA

## Dismissal of Complaints:

- **Mandatory Dismissals**

- Cecil County Public Schools must dismiss a complaint that:
  - Does not describe conduct that meets the definition of sexual harassment;
  - Alleges sexual harassment that did not occur in Cecil County Public Schools' education program or activity; and/or
  - Alleges sexual harassment that did not occur in the United States at all.
  - These complaints may be addressed under the code of conduct depending on the circumstances.

- **Discretionary Dismissals:**

- Cecil County Public Schools may dismiss a complaint if:
  - If the complainant notifies the Title IX coordinator in writing that the complainant wishes to withdraw the formal complaint or some of its allegations;
  - If the respondent is not enrolled in, or employed by, Cecil County Public Schools; or
  - If specific circumstances prevent the school from gathering evidence sufficient to reach a determination about the allegations.
- In the event of a dismissal of a formal complaint, Cecil County Public Schools will promptly send written notice of the dismissal and the reasons to both parties. Either party has the option to appeal the decision.

## Grievance Process in CCPS Procedure AC-RA

Individuals involved in the process will be trained in accordance with Title IX regulations, and the materials used to train Title IX personnel are available on Cecil County Public Schools' website.

That is what you are doing now!

# Grievance Process in CCPS Procedure AC-RA

## **APPEAL OF THE DETERMINATION OF RESPONSIBILITY:**

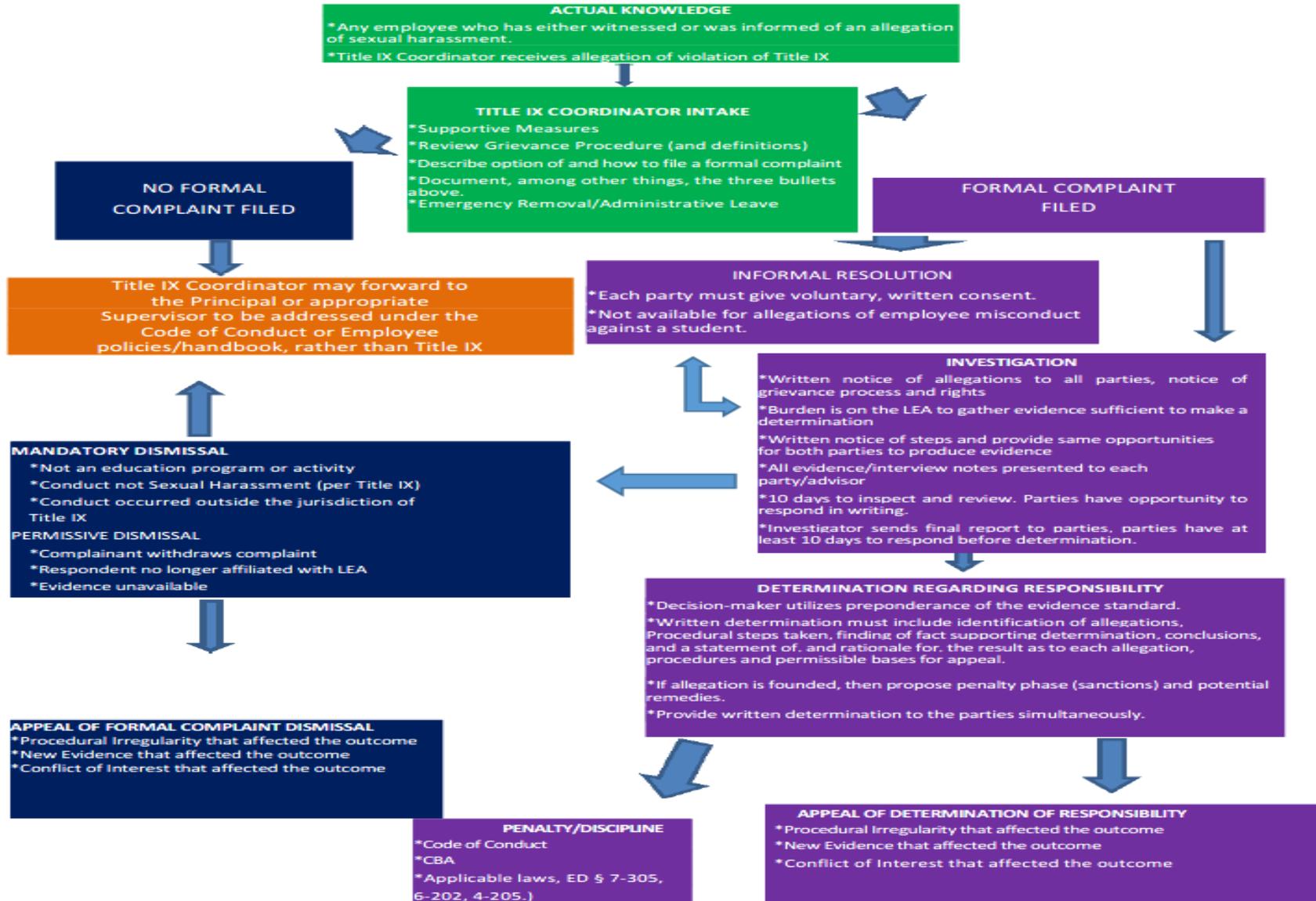
- The complainant or respondent may appeal the decision-maker's determination of responsibility or the dismissal of a formal complaint, to the Superintendent (or designee) within 10 calendar days of receiving the determination of responsibility or the notice of dismissal. The appeal decision-maker will not be the same individual who made the determination of responsibility, the investigator, or the Title IX Coordinator.
- The following are permissible grounds for an appeal:
  - A procedural irregularity affected the outcome of the matter;
  - New evidence has been discovered that was not reasonably available at the time of the determination on responsibility or dismissal; and/or
  - A conflict of interest on the part of the Title IX Coordinator, an investigator who compiled evidence, or a decision-maker, and the conflict of interest affected the outcome.
- If a party files an appeal, Cecil County Public Schools will notify the parties in writing, and will implement appeal procedures equally.
  - Both parties will have the opportunity to submit a written statement supporting or challenging the outcome.
  - After considering the parties' written statements, the Superintendent (or designee) will issue a written decision no later than 15 calendar days from the parties' written submission and send it to the parties simultaneously.
  - The Superintendent's (or designee's) determination regarding whether the respondent is responsible for the sexual harassment allegations becomes final after appeal.

# Grievance Process in CCPS Procedure AC-RA

## INFORMAL RESOLUTION PROCESS

- CCPS may facilitate information resolution on voluntary basis. Not an option for employee on student harassment.
- Cecil County Public Schools will only attempt informal resolution if each party enters the process completely voluntarily. No party will ever be forced or coerced into engaging in an informal resolution.
- Cecil County Public Schools will obtain the parties' voluntary, written consent before using any type of informal resolution process, such as mediation or restorative justice.
- Cecil County Public Schools will provide a facilitator who is free from conflicts of interest or bias, and who has received special training.
- Even in situations where the parties engage in voluntary informal resolution, Cecil County Public Schools will provide the complainant and respondent with notice of the allegations, notice of their rights, information about whether an informal process is confidential, and assurance that any party may withdraw from the informal resolution process at any time before an agreement is reached.

## TITLE IX GRIEVANCE PROCEDURE FLOWCHART



# Formal Grievance Process – Formal Complaints

- **Tips for conducting an investigation:**
  - Keep an open mind
  - Gather statements and put the pieces together
  - Let the statements drive your follow up questions
  - Dig deeper when something doesn't add up
  - Witness statements – document, in writing, time/date, location
  - Take and keep notes
  - Date everything (including the year)
  - Ask open-ended questions
  - Be specific: restate the profanity, harassing statement, conduct
  - Use students' names; sort out FERPA issues later
  - Keep students separated when taking statements

# Formal Grievance Process – Formal Complaints

- **Tips for conducting an investigation:**
  - Ensure legibility and clarity of statements
  - Use Q & A to clear-up any responses and have the students sign statements
  - The purpose of the interview is to learn information and not to elicit admissions of guilt
  - Determine credibility
  - Maintain confidentiality to the extent possible
  - Never promise that witnesses' names will not be revealed; explain that the matter will be kept as confidential as possible
  - Follow up with your sources
  - Keep Title IX Coordinator apprised of investigation

# Formal Grievance Process – Formal Complaints

- **Retaliation is Prohibited**

- A retaliation complaint may be filed and processed through the Title IX grievance procedures

- **Conduct Not Constituting Retaliation**

- The exercise of rights protected under the First Amendment does not constitute retaliation
- Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation

# Formal Grievance Process – Formal Complaints

## **Serving impartially, without pre-judgment, without conflict of interest, and without bias**

- View each party/witness as a blank slate – do not make assumptions about a party based on their status as a complainant or respondent, their sex, their looks, their academic level/achievement, etc.
- Keep facial expressions and tone of voice neutral – do not express shock, disbelief, anger, etc.
- Observe and listen – do not lead (but ask relevant questions if follow-up is needed)
- Maintain objectivity – do not take sides
- Give each party/witness the same opportunities to be heard
- Treat each party/witness with respect and in calm demeanor

# Formal Grievance Process – Formal Complaints

## **Serving impartially, without pre-judgment, without conflict-of-interest, and without bias**

- If you suspect you may have a conflict of interest (i.e., personal involvement in case, prior knowledge of circumstances, personal/familial relationship to party), immediately inform the Title IX Coordinator before proceeding
- If bias, prejudice, or anything else may prevent you from serving fairly and impartially, immediately inform the Title IX Coordinator before proceeding
- If you have any questions about maintaining impartiality, avoiding pre-judgment, avoiding conflict of interest, and non-biased investigating or decision-making, contact the Title IX Coordinator

# Hypothetical 1

- Jessica, a 7<sup>th</sup> grade student at Public Middle School, reports to Ms. Jacobs, her math teacher, that Jimmy, one of Jessica's classmates, has been making comments to her about her looks, has been staring at her in class, and keeps brushing up against her back side in the hallway. She reports that this behavior started two weeks ago and has been happening every day since.
- What should Ms. Jacobs do next?
- As the Title IX Coordinator, what actions do you take?

## Hypothetical 2

- James, a freshman on the Public High School Football team, reported to his coach that seniors on the team hazed him and other freshman on the team by subjecting them to sexually humiliating taunts in the locker room, weight room, and during other team activities. James also reported that members of the team have a group chat on social media where seniors post lewd, vulgar, and harassing messages directed towards freshman players. Finally, James reported that members of the team met at the football field at midnight the previous Saturday to engage in hazing rituals, which included more sexually humiliating taunts.
- What should the Coach do next?
- As the Title IX Coordinator, what do you do?
- Does it matter that the alleged respondents are the same sex of the alleged complainant's?
- Does the CCPS have jurisdiction over all aspects of this harassment complaint? What aspects of this scenario inform your decision?

## Hypothetical 3

- Rachel tells the Title IX Coordinator that Rich, a fellow student in Rachel's U.S. history class, made comments in class against women's suffrage and argued that women should not be permitted in the military. Complainant stated that this was devastating to her because she interpreted this as an attack on her and other women in the class.
- As the Title IX Coordinator, what do you do?
- Does this scenario present any First Amendment concerns?

# Hypothetical 4

- It is the first day of school and Sierra, a high school sophomore, tells the Title IX Coordinator that her boyfriend hit her in the face and wants to file a complaint against him. Sierra states that he hit her six months ago when she was a freshman and he was a senior, but they just broke up over the summer and she felt she should report it.
- As the Title IX Coordinator, what do you do?
- Does the CCPS have jurisdiction over this Title IX Complaint?
- If you cannot implement any remedies against the respondent, are there any other actions you can take?

## Other Title IX Action Items

- 1) Notification of identity and contact information of Title IX Coordinator(s) to employees/applicants, students, parents, unions;
- 2) Notification of Nondiscrimination Policy to employees/applicants, students, parents, unions;
- 3) Publication of Title IX Coordinator(s) identity and contact information;
- 4) Adoption and Publication of Title IX Grievance Procedures;
- 5) Training of Title IX Coordinators, Investigators, Decision-Makers, and Information Resolution Facilitators;
- 6) Publication of Training Materials on Website;
- 7) Recordkeeping (7 years).

Questions

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