F3 Law

2020 Title IX Regulations: K-12 Initial Compliance Training

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Ask Questions

Agenda

Receiving Reports of Sexual Harassment

Recognizing Title IX Sexual Harassment

Applying Title IX Sexual Harassment Complaint Procedures

Why Are We Here?

Training Goals

- Comply with federal law requiring this training
- Recognize when sexual harassment is Title IX Sexual Harassment
- Review the rules and procedures appliable to Title IX Sexual Harassment
- Prepare to address Title IX Sexual Harassment

Why is this so important?

Terminology

Apply to parties in both *reports* and *Formal Complaints* of sexual harassment

Title IX Complainant: A person who is alleged to be the victim of conduct that could constitute sexual harassment

NOT a third party who reports Title IX Sexual Harassment perpetrated against someone else

NOT the Title IX Coordinator, even if the TIXC "signs" a Formal Complaint

Title IX Respondent: A person who has been reported to be the perpetrator of conduct that could constitute sexual harassment

What is Title IX?

What do you think of when you hear "Title IX"?

Nobody has responded yet.

Hang tight! Responses are coming in.

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Title IX

Title IX Statute

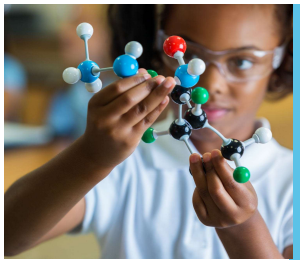
(20 U.S.C. §§ 1681–1688)

"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."

What falls under Title IX?

- Recruitment, Admissions, and Counseling
- Financial Assistance
- Athletics
- Sex-Based Harassment
- Treatment of Pregnant & Parenting Students
- Discipline
- Single-Sex Education
- Employment
- Retaliation

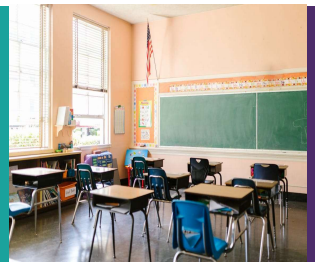
Schools must:



- Designate A Title IX Coordinator

- Train staff

- Adopt, Publish & Implement Nondiscrimination Policy and Grievance Procedures



- Publish training materials

- Notice of Nondiscrimination

- Recordkeeping

The Title IX Coordinator's role is to serve as a confidential advisor to the complainant or any other party. True or false?

True

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False

0%

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When Must a School Respond to Sexual Harassment?

ALWAYS

Employment

- California Fair Employment & Housing Act (FEHA)
- Educ. Code § 212.5
- Title VII
- Title IX

Students

- Educ. Code § 212.5
- Title IX

When must a school respond to Title IX sexual harassment?

A school with actual knowledge of [Title IX] sexual harassment in an education program or activity against a person in the United States must respond as required under the 2020 Title IX rules….

Notice

- ACTUAL knowledge
- By Title IX Coordinator or “official with authority” = any K-12 employee

Actual Knowledge

- Sense
- Informed

If the only individuals with knowledge of conduct in violation of Title IX are complainant and respondent. Respondent is an employee.

Does the District have actual knowledge of conduct triggering its duty to respond because Respondent-employee is aware of his conduct?

A. Yes

B. No

C. I really hope not

Does the District have knowledge of conduct triggering its duty to respond because Respondent-employee is aware of his conduct?

Yes

0%

No

0%

I really hope not

0%

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Teacher overhears students saying a student was raped at the football game.

True or False: The teacher has actual knowledge requiring the school to respond.

The teacher has actual knowledge of alleged sexual harassment requiring the school to respond.

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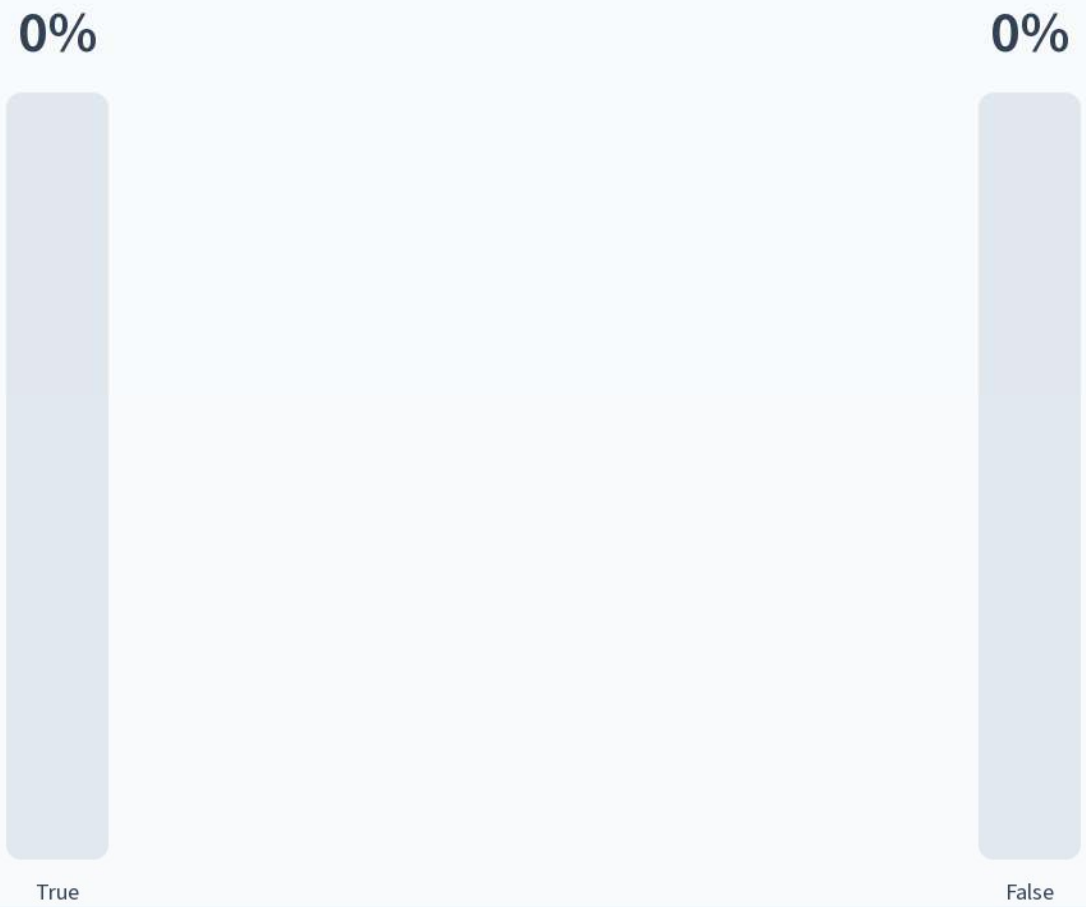
Reporting Sexual Harassment

- Anyone can report
- By any means that results in the Title IX Coordinator receiving the report
- At any time

Key Word: “Allegation”

- Once a school has notice of an allegation that, if true, would constitute sexual harassment, it must respond
- “Well, we didn’t believe there was enough evidence it happened” does not get you past your responsibility to use your Title IX procedures

School are not required to respond to anonymous complaints



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What is Sexual Harassment?

Employment

- California Fair Employment & Housing Act (FEHA)
- Educ. Code § 212.5
- Title VII
- Title IX

Students

- Educ. Code § 212.5
- Title IX

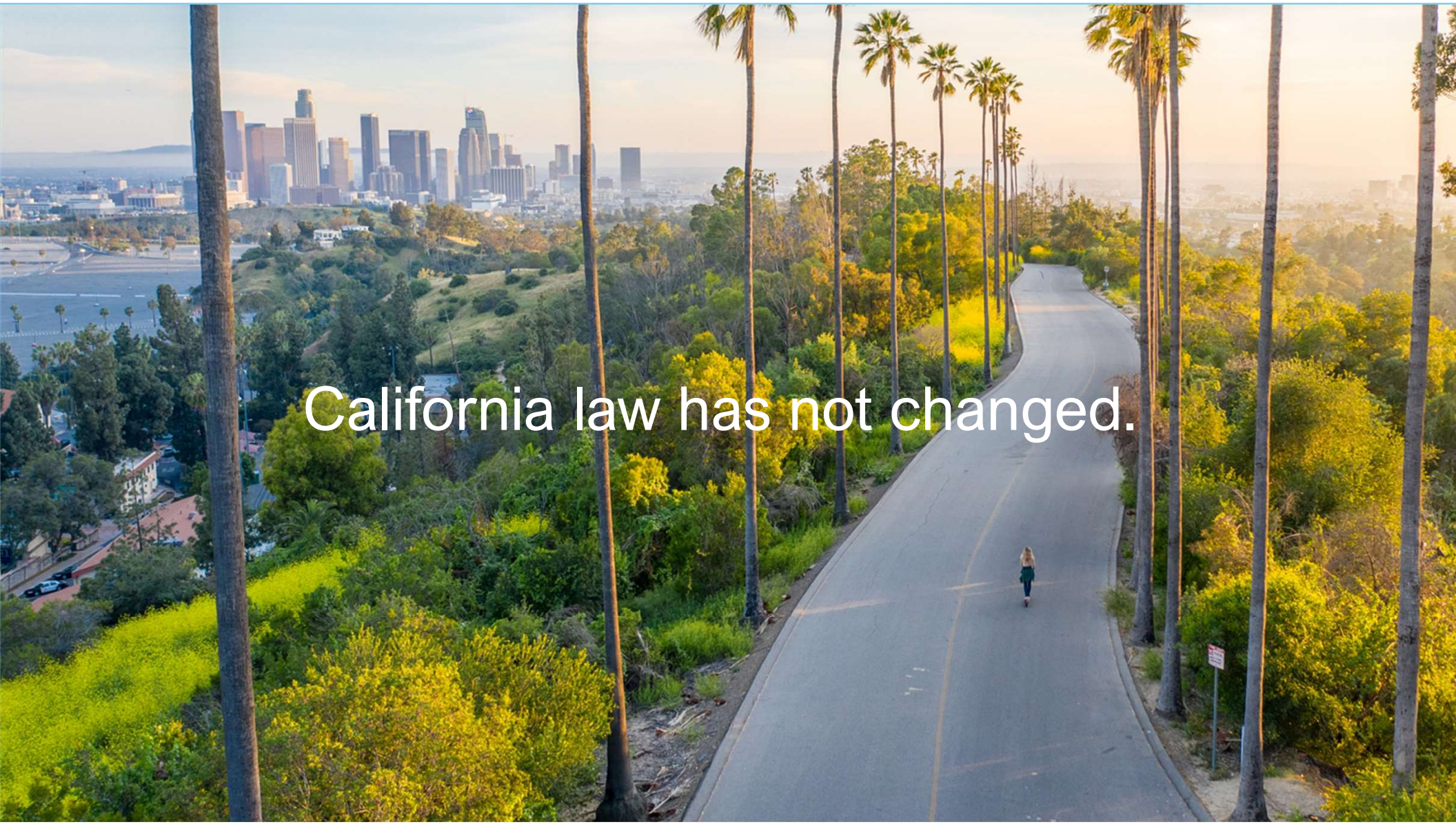
It Depends Which Law Applies

Title IX Sexual Harassment Requires Separate Procedures

TIX Sexual Harassment Only → Title IX Sexual Harassment Complaint Procedures (AR 4119.12/4219.12/4319.12 (Personnel) & AR 5145.71 (Students)

All other sexual harassment → AR 4119.11/4219.11/4319.11 (Personnel) & AR 5145.7 Sexual Harassment

Non-sex based harassment → Other Board policies prohibiting such conduct (e.g., bullying, nondiscrimination)


California law has not changed.

California Law

- Discrimination in any education program or activity is prohibited in California on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic in the definition of hate crimes, including immigration status. (EC 220)
- California's public schools have an **affirmative obligation to combat** racism, sexism, and other forms of bias, and a responsibility to provide equal educational opportunity. (EC 201(b))

What is Title IX Sexual Harassment?

Title IX Sexual Harassment

- Employee quid pro quo
- Hostile environment
- Clery/VAWA “Big 4”

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Title IX Quid Pro Quo

- **Definition:** An employee of the school conditioning an aid, service, or benefit of the school on an individual's participation in unwelcome sexual conduct
- Only an employee (not a volunteer, another student, etc.)
- Severity and harm presumed

Before a test, Noah, a student, arrives early to school. Noah tells Teacher, Noah is nervous about the test. Teacher tells Noah that they hurt their shoulder playing pickle ball this weekend and unless Noah gives them a shoulder massage before the bell rings, Teacher will give Noah a C on the test. Noah thinks Teacher might be trying to be funny. Noah does not give Teacher a massage. Noah gets an A on the test.

Could this be quid pro quo sexual harassment?

Nervous Noah & Teacher - Could this be quid pro quo sexual harassment?

Yes

0%

No

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VAWA “Big Four”

- Sexual Assault

  20 U.S.C. 1092(f)(6)(A)(v)
- Domestic Violence

  34 U.S.C. 12291(a)(8)
- Dating Violence

  34 U.S.C. 12291(a)(10)
- Stalking

  34 U.S.C. 12291(a)(30)

Sexual Assault

- Forcible or nonforcible sex offense under the uniform crime reporting system of the FBI
  - Rape: carnal knowledge without consent
  - Sodomy: oral or anal intercourse without consent
  - Sexual assault with object: use of object to unlawfully penetrate, however slightly, genital or anal opening without consent
  - Fondling: touching of the private body parts of another person for the purpose of sexual gratification without consent
  - Statutory rape
  - Incest

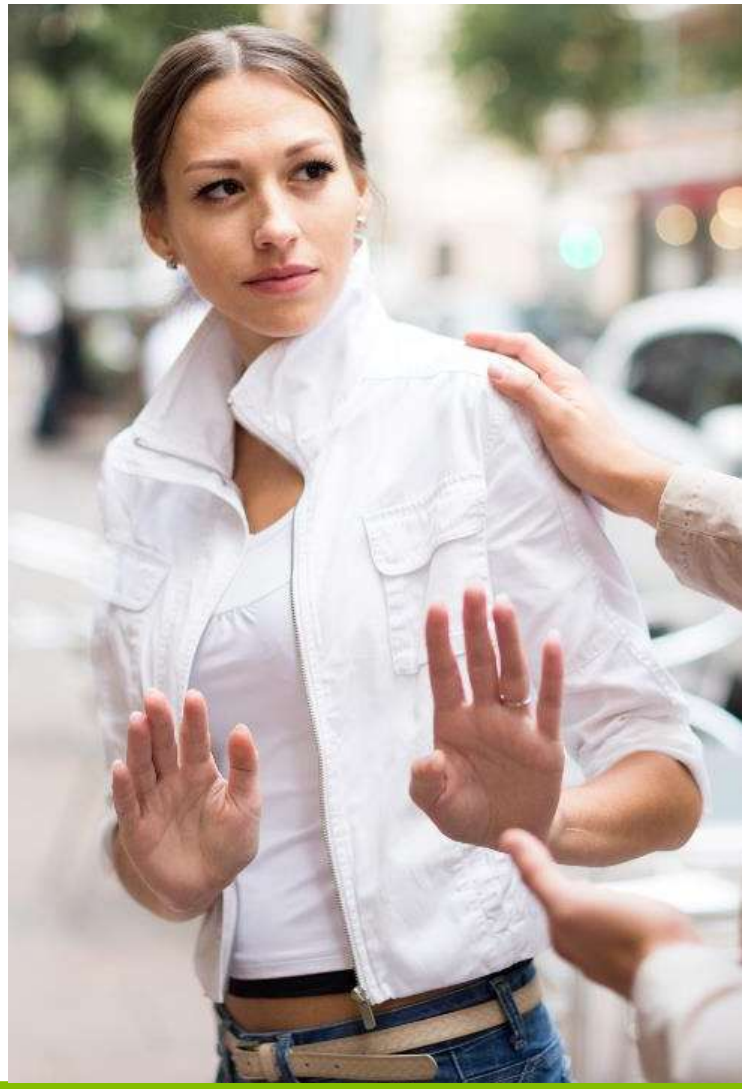
Title IX Hostile Environment

Title IX Hostile Environment

Unwelcome conduct determined by a reasonable person to be **so severe, pervasive, and objectively offensive that it effectively denies a person's equal access to the school's education program or activity**

Unwelcome Conduct

- Consent ≠ Welcome
- Silence ≠ Welcome
- Not requested or invited
- Regarded as undesirable or offensive
- Failure to complain, resist, or object to conduct ≠ welcome
- Acquiescence to the conduct ≠ welcome



What is severe?

Severe

- Extremely serious
- Severely hostile or abusive
- More than juvenile behavior among students
- More than antagonistic, non-consensual, and crass
- Simple acts of teasing and name calling are not enough

What is pervasive?

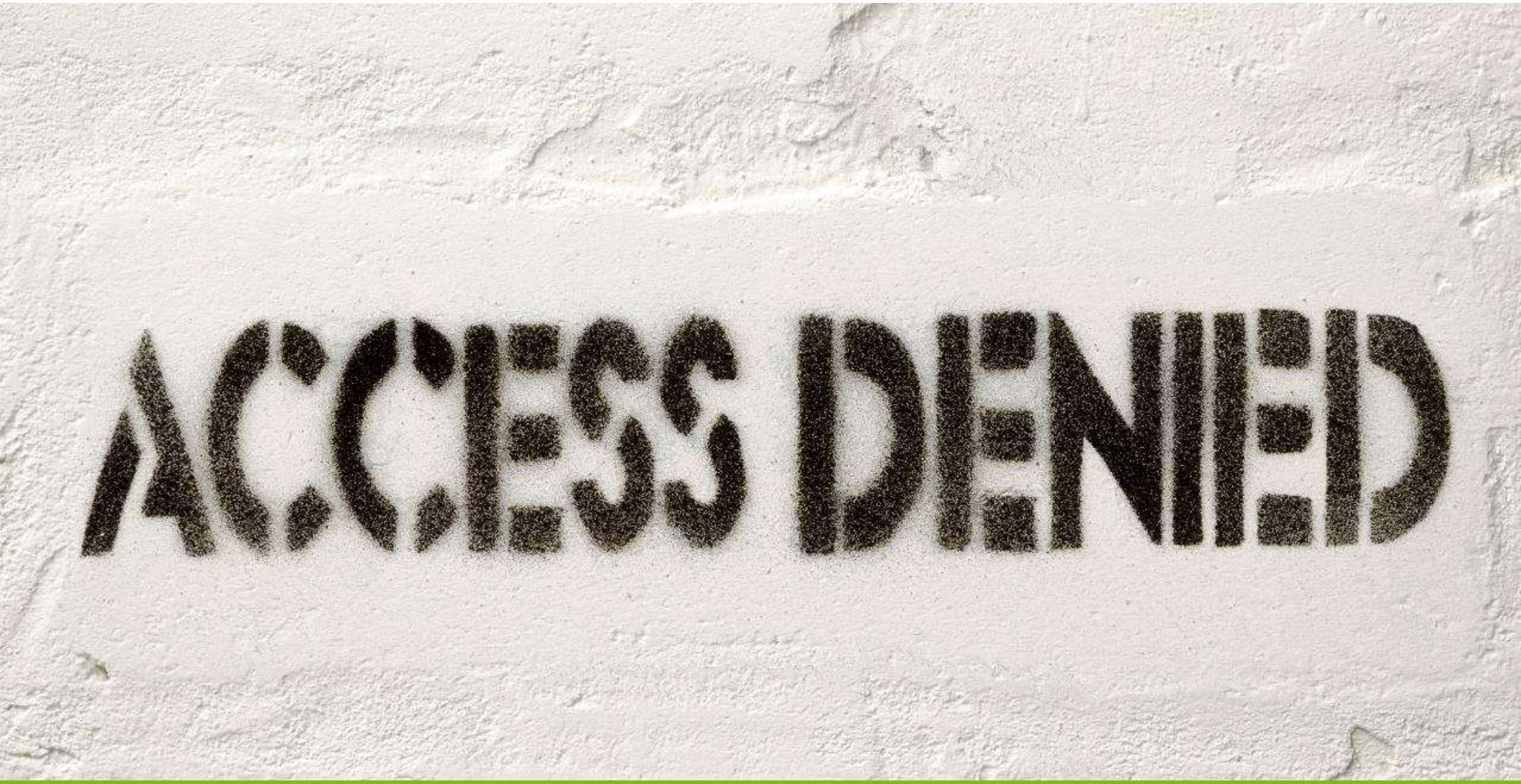
Pervasive

- Systemic, widespread
- Occurring on multiple occasions
- Persistent
- Openly Practiced
- Pattern or practice of harassment
- Sustained and nontrivial

What is objectively offensive?

Objectively Offensive

- Objectively offensive to a reasonable person in complainant's position
- Constellation of surrounding circumstances, expectations, and relationships

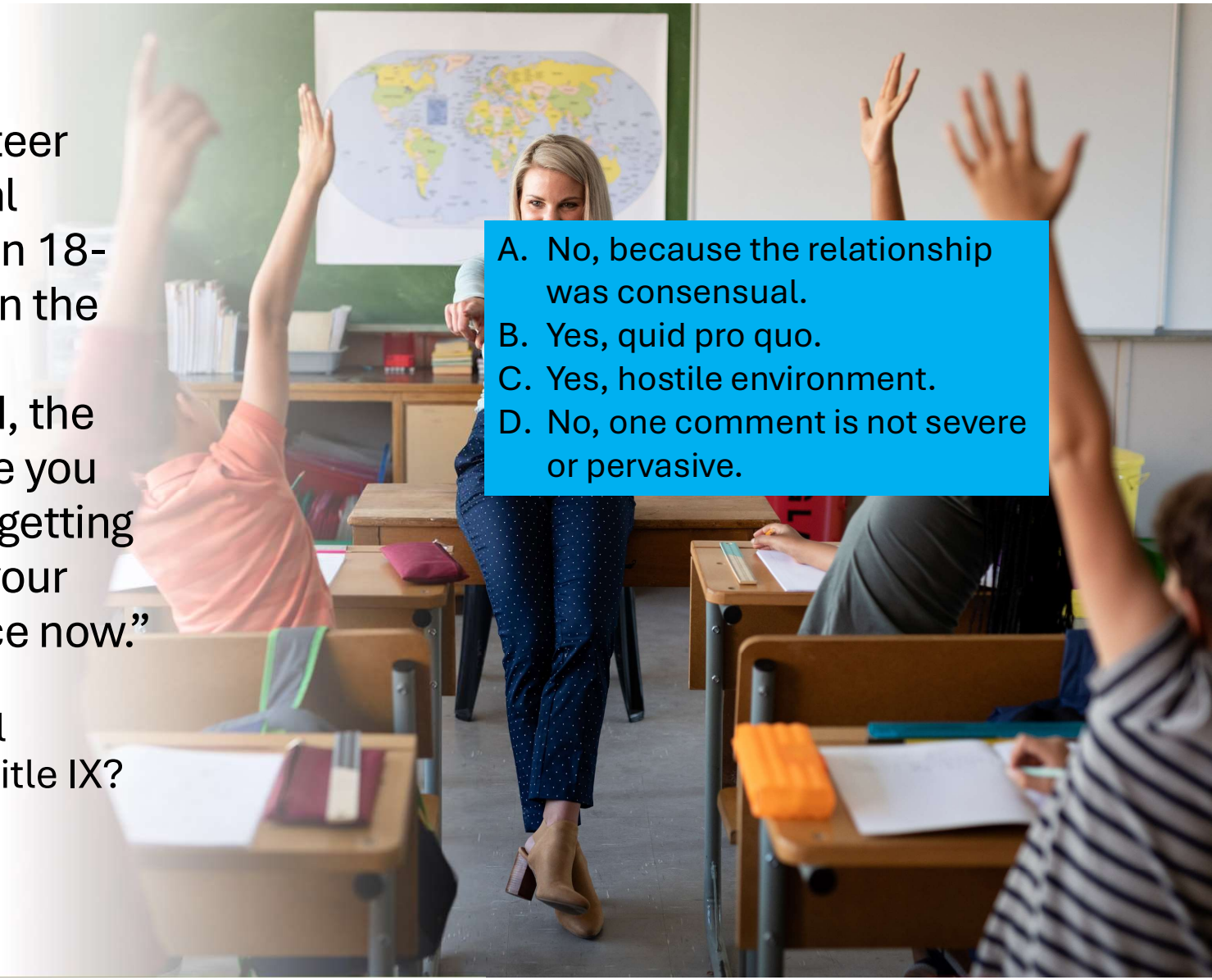

ACCESS DENIED

Denial of Equal Access

- Hostile environment - harm is not presumed
  - Effectively denies a person EQUAL access to the school's education program or activity
  - "So undermines and detracts from the victims' educational experience…"
  - Specific manifestation of trauma not required

19-year-old volunteer coach had a sexual relationship with an 18-year-old student on the team. When the relationship ended, the coach said, “I hope you realize you will be getting playing based on your actual performance now.”

Could this be sexual harassment under Title IX?



A. No, because the relationship was consensual.
B. Yes, quid pro quo.
C. Yes, hostile environment.
D. No, one comment is not severe or pervasive.

19 year-old coach - Could this be sexual harassment under Title IX?

No, the relationship was consensual.

0%

Yes, quid pro quo.

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Yes, hostile environment.

0%

No, one comment is not severe or pervasive.

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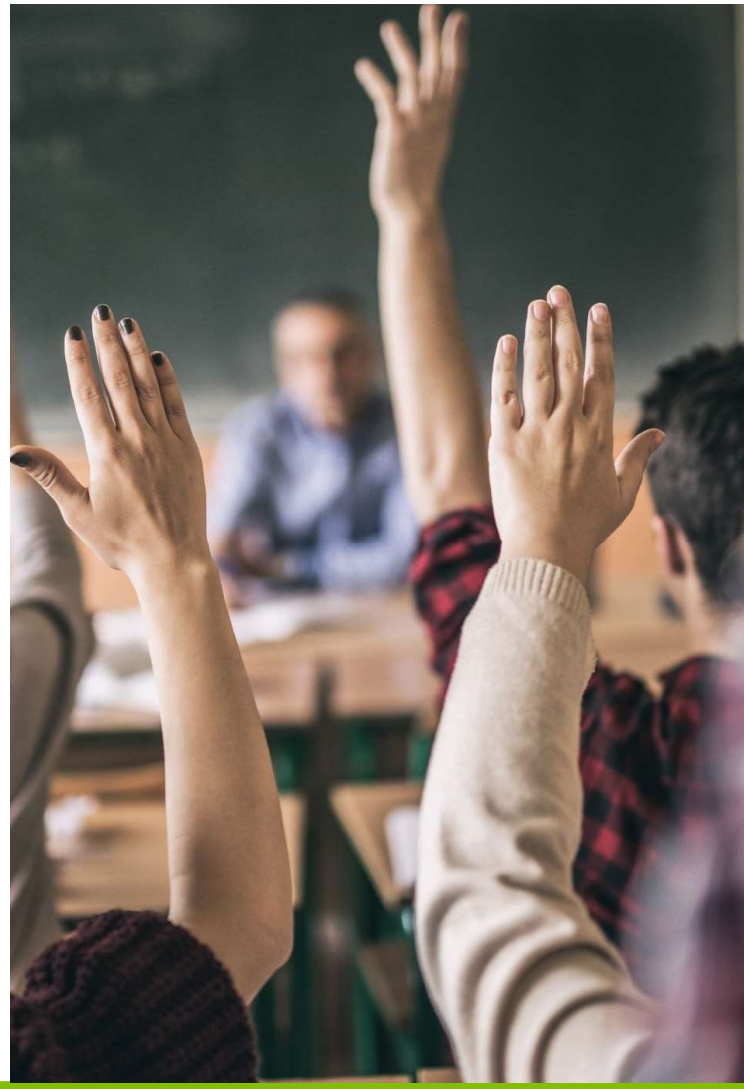
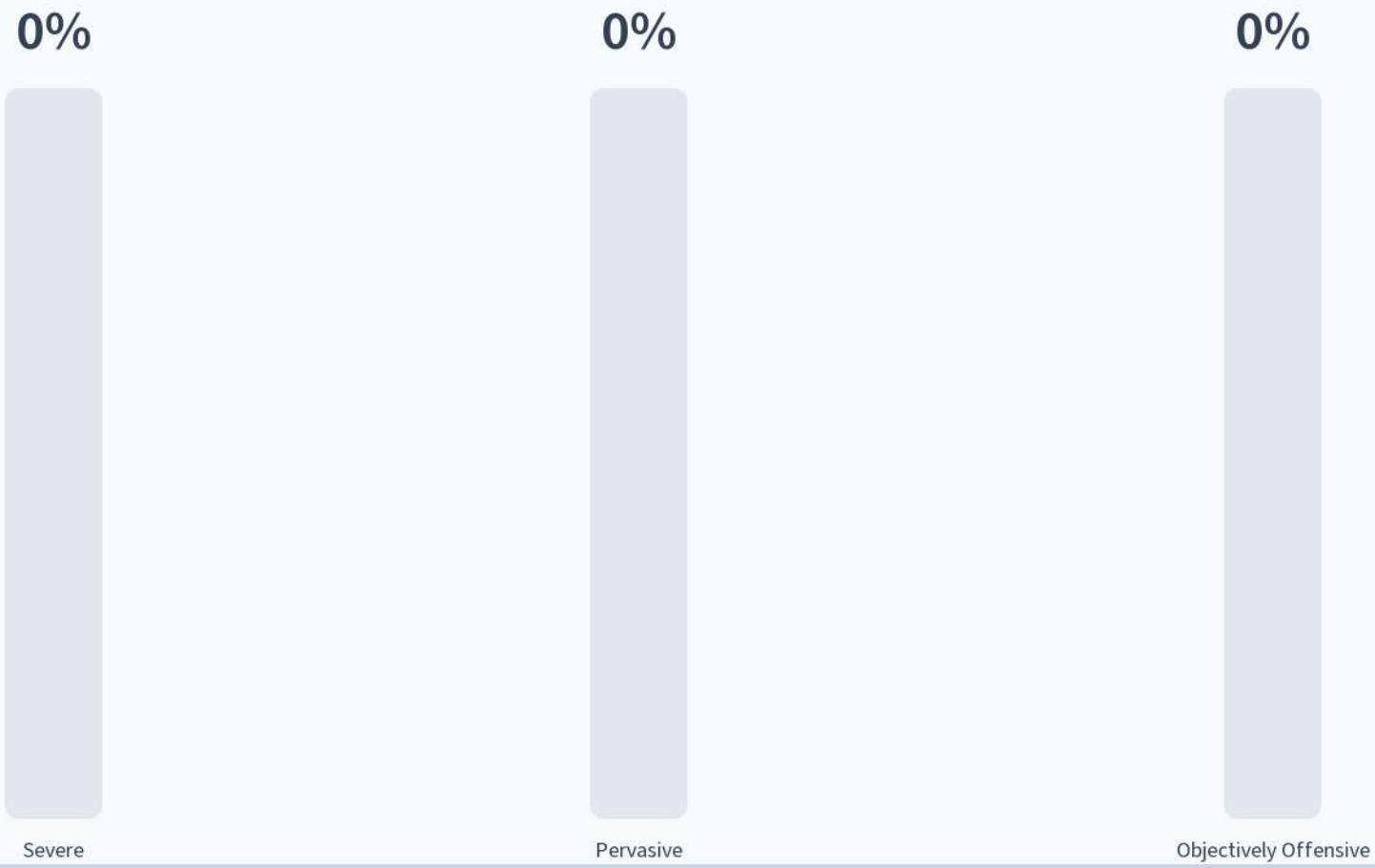
Practical Analysis

Is this so severe, pervasive, and objectively offensive?

Blake asks Ryan out on a date.



Severe, Pervasive & Objectively Offensive?



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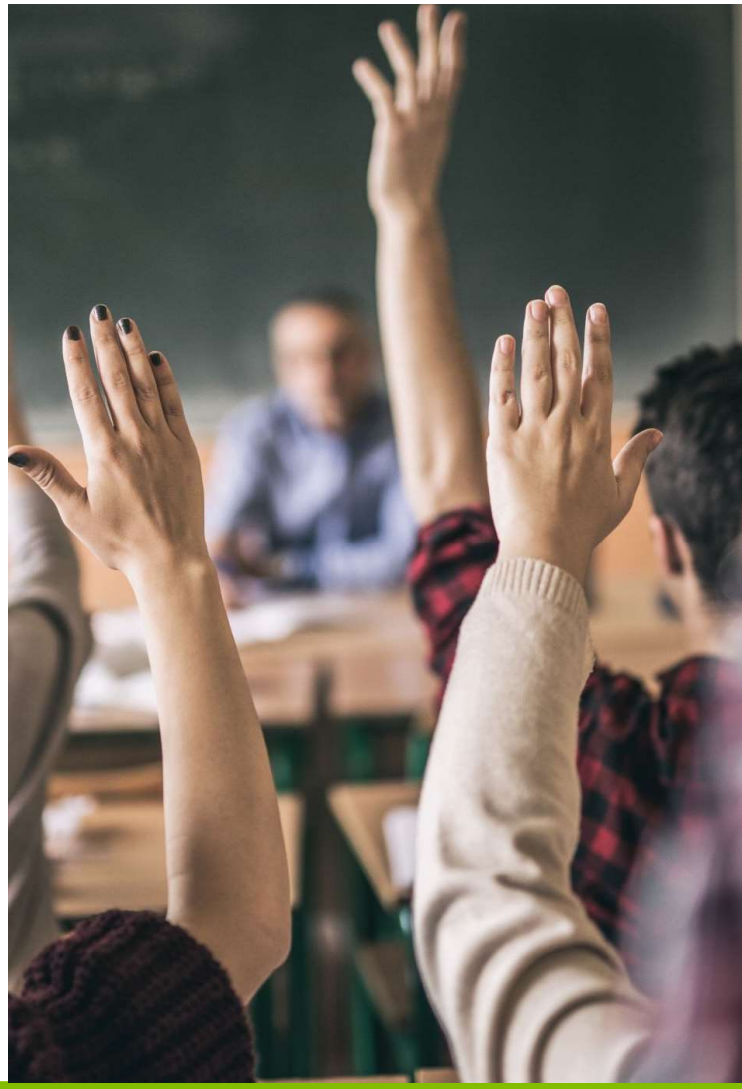
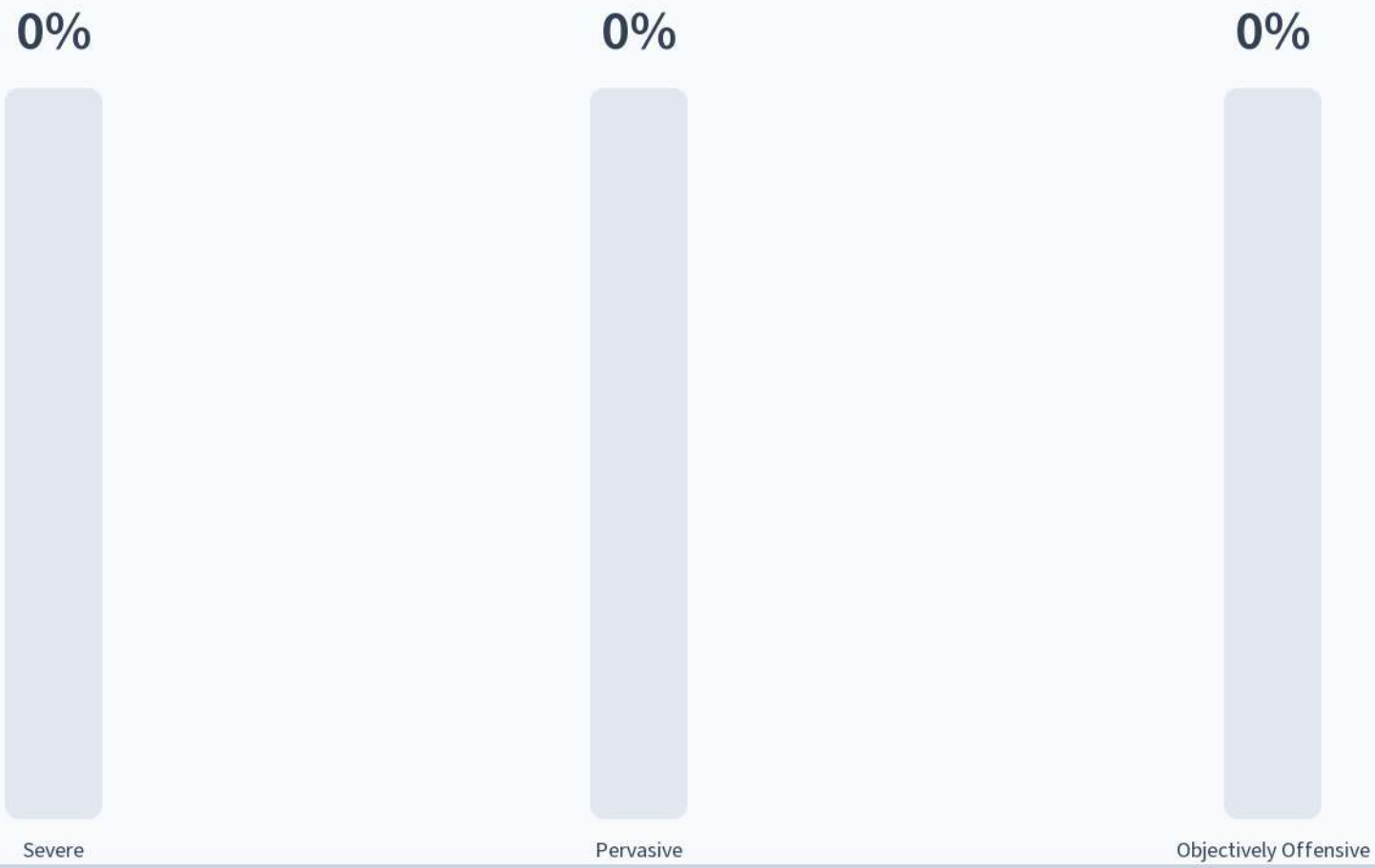
Football players call the only female player on the team “slut” and “run-through” and comment that she is only there for “dick”. One day, after practice, her stuff in her locker is covered in lotion.



Severe, Pervasive & Objectively Offensive?



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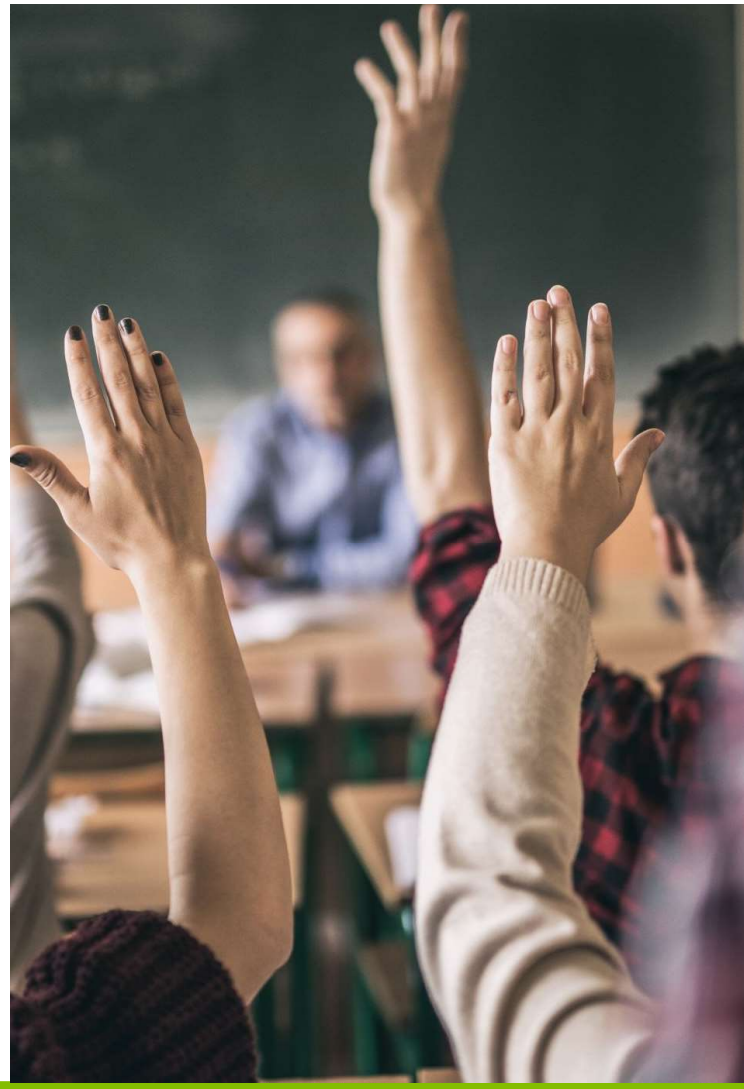
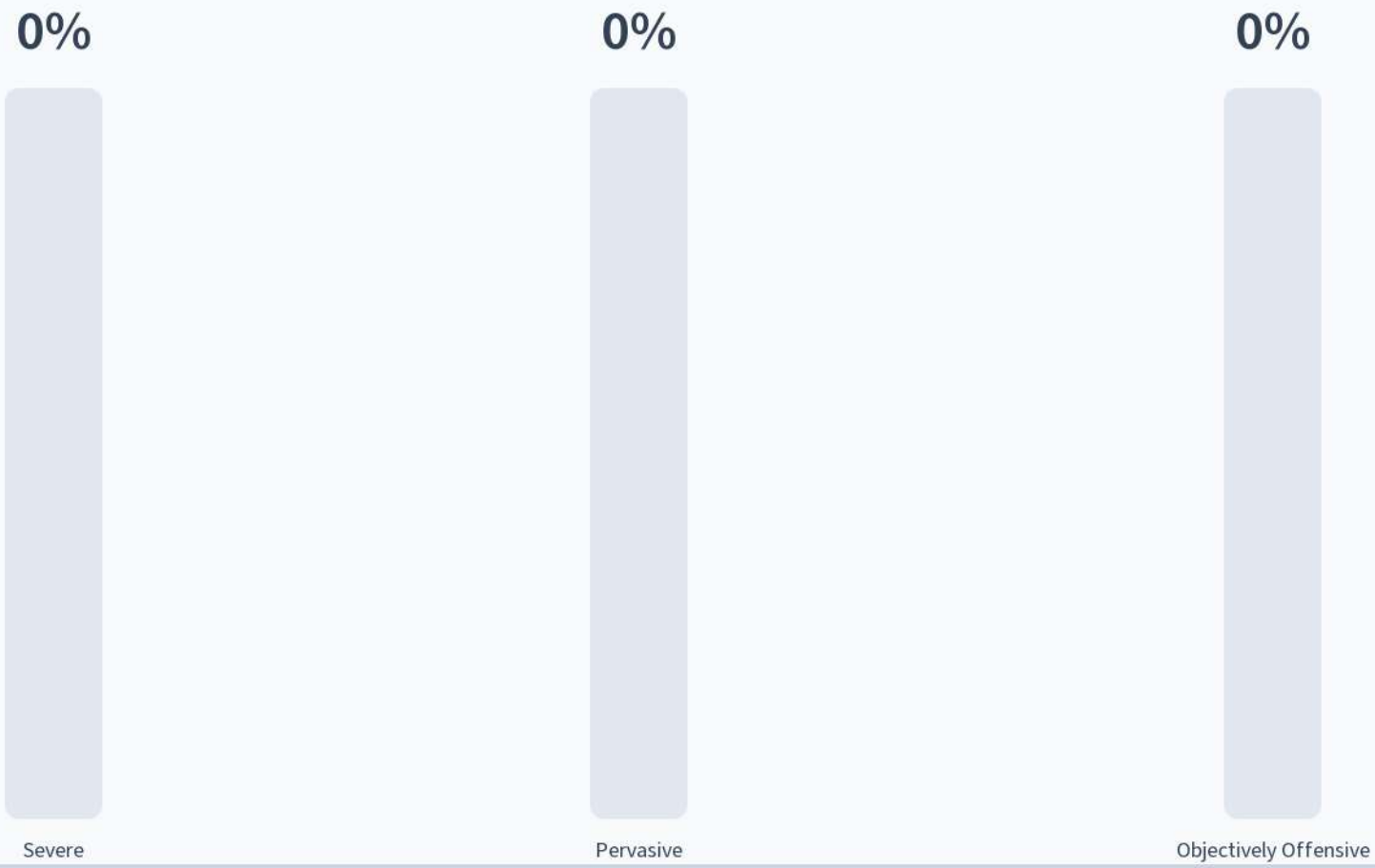
Without permission, a student films a consensual sex act with another student off campus. Student shows the video to other students on campus.



Severe, Pervasive & Objectively Offensive?



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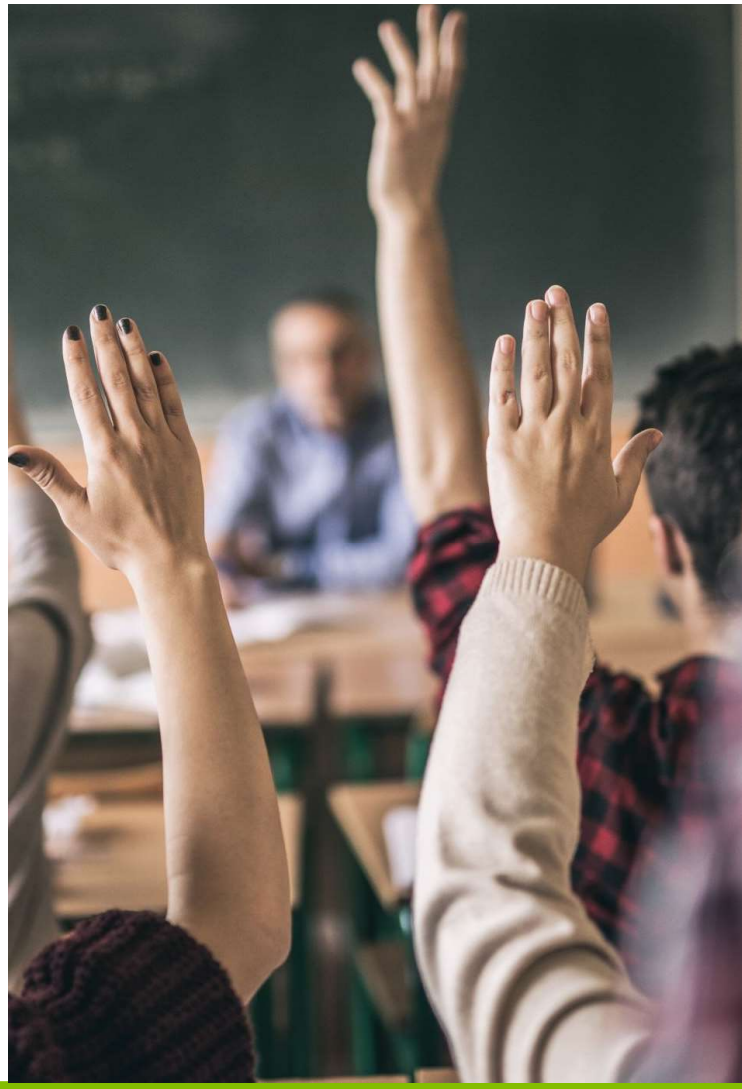
Teacher makes a sexually inappropriate comment to a student in class.



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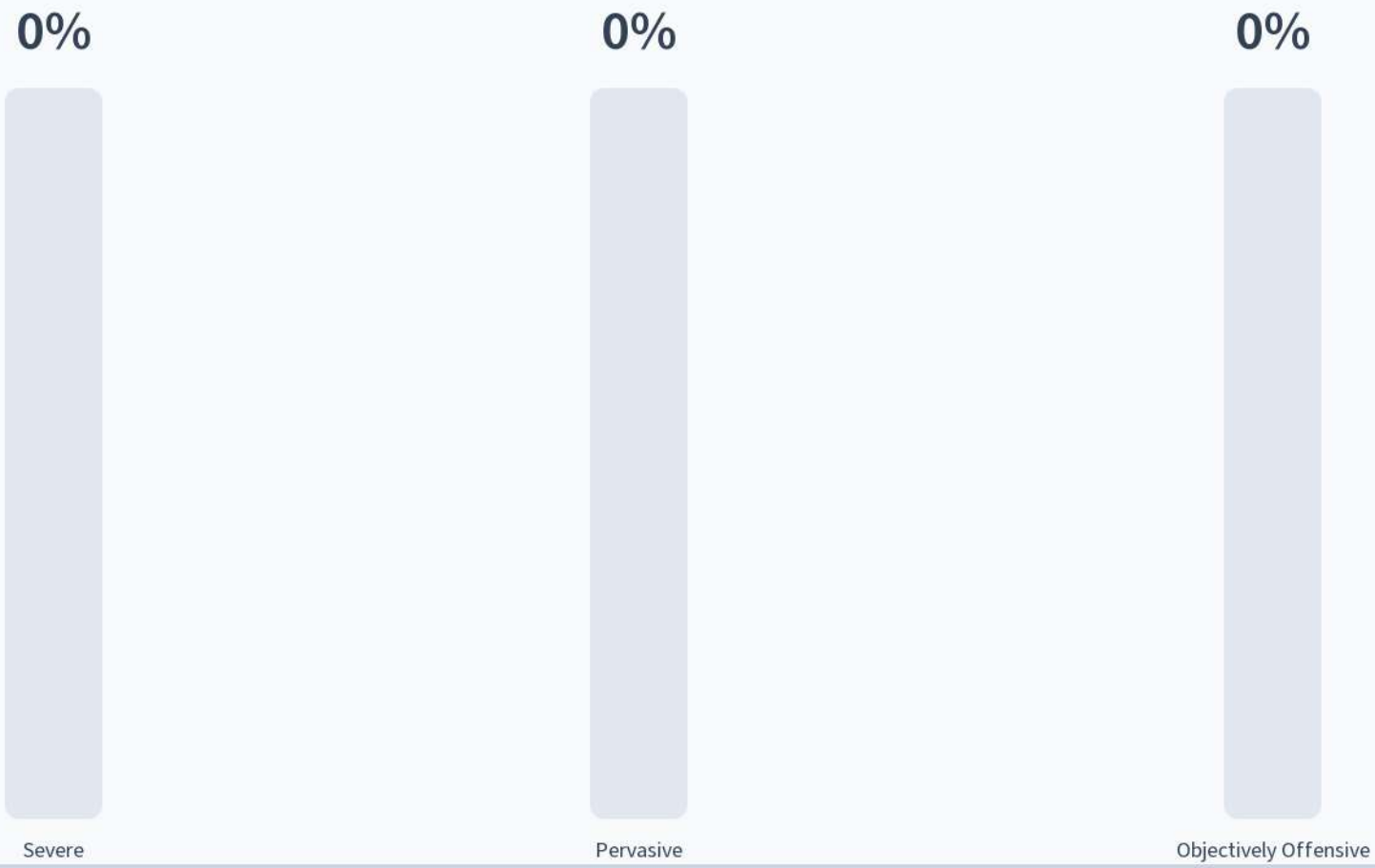

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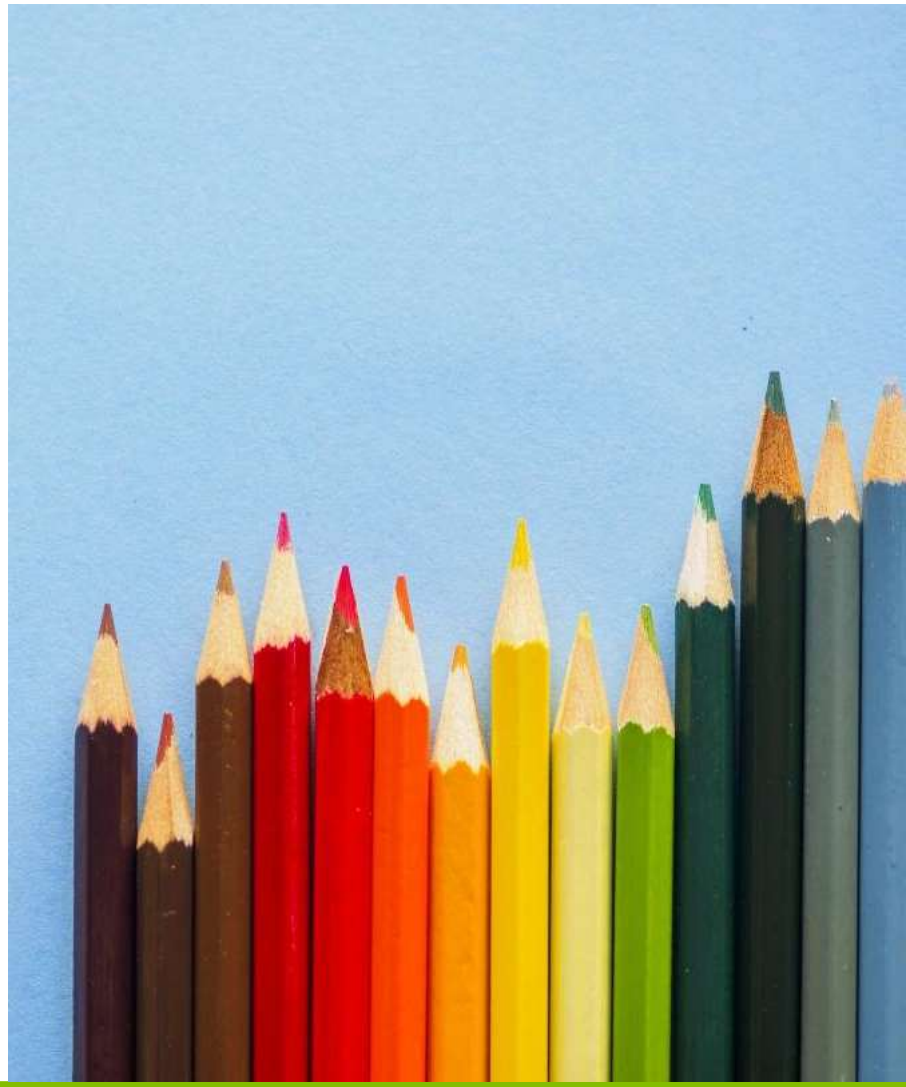
Title IX Sexual Harassment Must Be “In a Program or Activity”



Program or Activity: Any location, event, or circumstance over which the school exhibits substantial control over both the respondent and the “context” in which the harassment occurred

Online & Off Campus

Substantial control over the context?

Schools need only address sex discrimination occurring against a person *in the United States* under Title IX

Responding to Title IX Sexual Harassment

Parts of Title IX Sexual Harassment Process

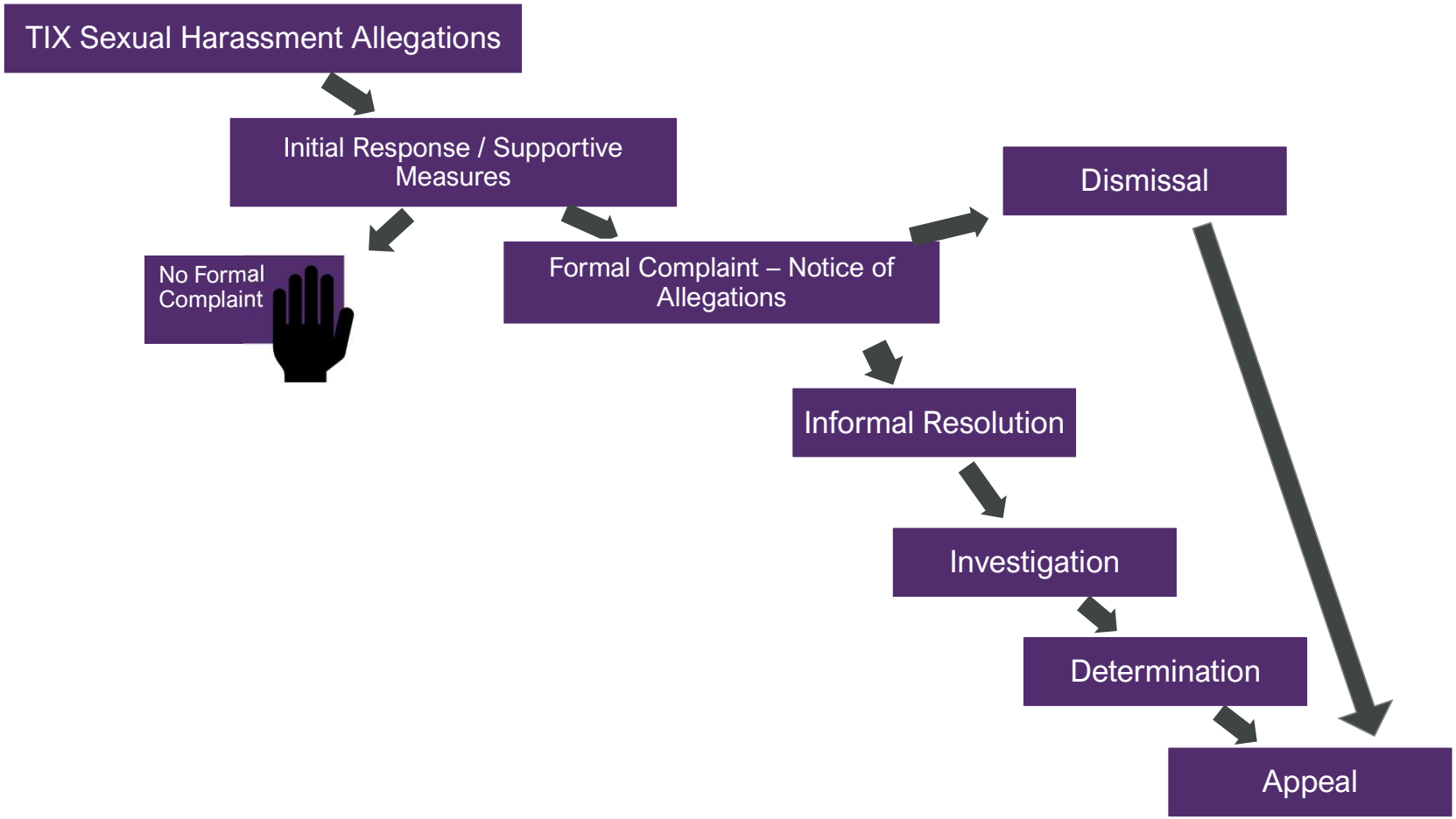
Initial Response/ Supportive Measures

Informal Resolution (Voluntary)

Investigation

Decision

Appeal


TIX Sexual Harassment Allegations
Initial Response / Supportive Measures
No Formal Complaint
Formal Complaint – Notice of Allegations
Dismissal
Informal Resolution
Investigation
Determination
Appeal

Written Notice Required

- Informal resolution notice
- Notice at start of investigation
- Dismissal notice
- Interview notices
- Report
- Notice which proposed questions not asked on cross and why
- Written determination and notice of appeal rights

Written Notice Recommended

- Document information to complainant at initial meeting, including supportive measures requested/provided
- Document that review of evidence provided to both parties
- Document opportunity to ask questions, answers, follow-up questions, etc.

Initial Response/Supportive Measures

Initial Response

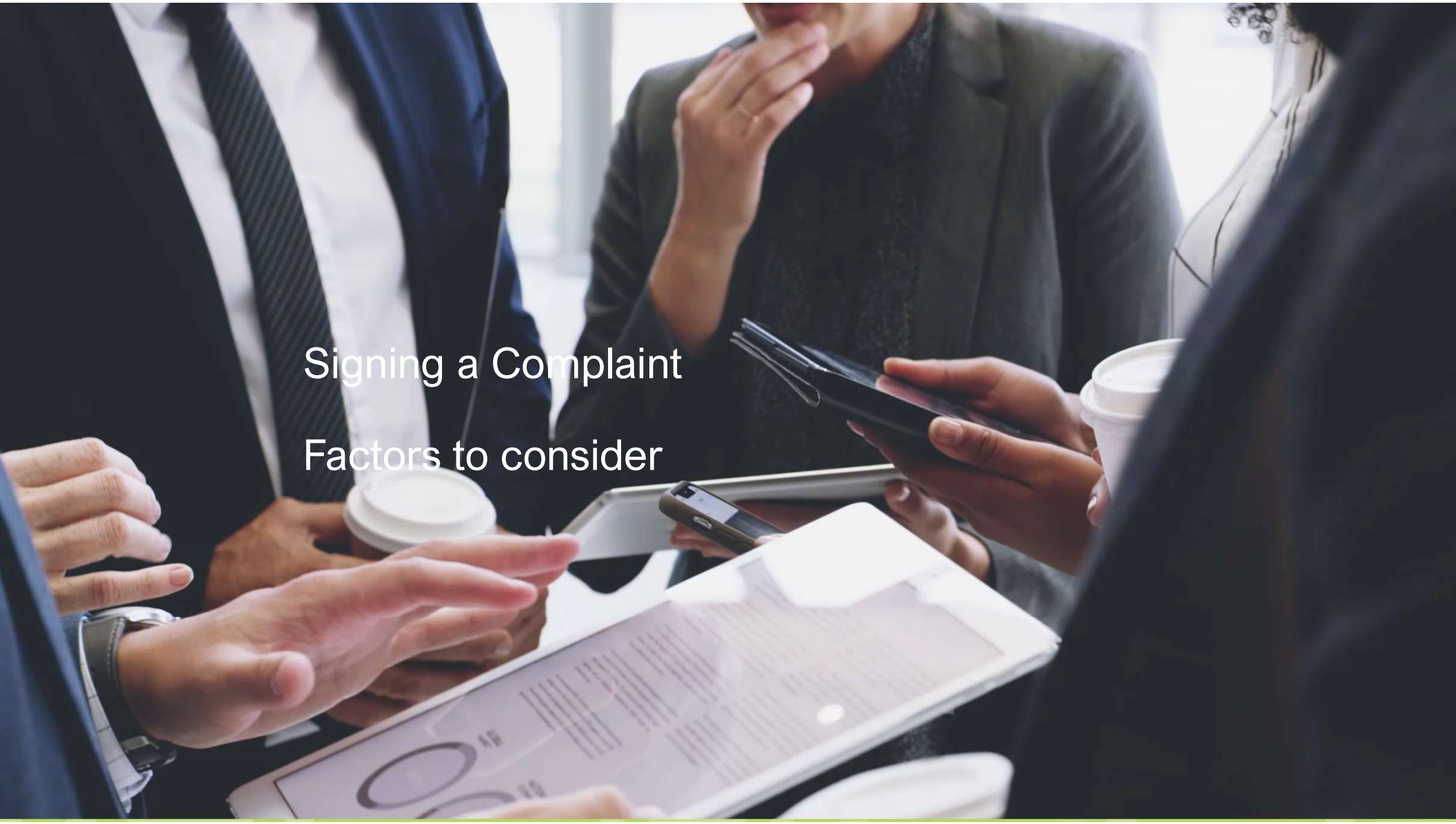
- Title IX Coordinator or designee must promptly, **even if no Formal Complaint is filed**:
- Contact the Title IX Complainant to discuss the availability of “supportive measures”
- Consider the Title IX Complainant’s wishes with respect to supportive measures
- Inform the Title IX Complainant of the availability of supportive measures with or without the filing of a formal complaint
- Explain the process for filing a Formal Complaint

Formal Complaint

- Defined as a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment. 34 C.F.R. § 106.30(a).

Confidentiality

- Not required to maintain anonymity of Complainant after formal complaint is filed
- Both parties must be identified (if identity is known) in written notice of allegations
- Using party initials or withholding Complainant's identity is insufficient



Signing a Complaint

Factors to consider

Supportive Measures

- **Non-punitive**, individualized services, offered as appropriate and without charge to a complainant or a respondent before or after the filling of a formal complaint, or where no complaint has been filed. (34 CFR106.30(a).)
- **Should be designed to restore or preserve equal access to the education program or activity without "unreasonably" burdening the other party**

Examples of Supportive Measures

- Extensions
- Changes in class, work, extracurricular or other activity (regardless of whether there is a comparable alternative)
- Campus escort / increased security & monitoring
- Excused absences
- Testing accommodations
- Parking accommodations
- Referral to and coordination of campus and/or community resources and support
- Training and education
- Contact Restrictions/No Contact Directives
- Counseling or specialized training or support groups

Emergency Removals / Admin Leave

Immediate emergency removal

(34 C.F.R. 106.44(c))

- Conduct an individualized safety and risk analysis to determine if emergency removal is necessary to protect a student or other individual from **immediate threat** to **physical health or safety arising from the allegations of sexual harassment**
- **Notice, opportunity to challenge** provided "immediately" provided the removal
- Consider other laws, e.g., "change in placement" under IDEA

Employee administrative leave

(34 C.F.R. 106.44(c))

- Still permitted consistent with state law, board policy, handbooks and collective bargaining agreements

Dismissals

- **Mandatory if conduct alleged:**
- Not sexual harassment, even if true
- Did not occur in the school's program or activity
- Did not occur in the United states
- **can still address under non-Title IX policy

- **Permissive if:**
- Complainant requests to withdraw in writing
- Respondent's enrollment or employment ends
- Specific circumstances prevent school from gathering evidence sufficient to reach a determination (e.g., passage of time, lack of cooperation by complainant)

Informal Resolution (Voluntary)

Informal Resolution

INFORMAL RESOLUTION IS NOT PERMITTED UNDER THE FOLLOWING CONDITIONS:	INFORMAL RESOLUTION MAY MOVE FORWARD UNDER THE FOLLOWING CONDITIONS:
• Cannot condition enrollment, employment, or any right on waiver of right to investigation and adjudication of formal complaints under grievance procedure • Cannot require use of informal resolution process • Cannot offer informal resolution process until formal complaint is filed • Not available to resolve allegations that employee sexually harassed a student	• Any time prior to reaching a determination, either party may request informal resolution • Requires voluntary, written consent from both parties • Any party has a right to withdraw prior to agreement

Informal Resolution Facilitators

Should we use Title IX Coordinator or investigator(s) or decisionmakers

Written Notice Required

- To both parties
- Allegations
- Requirements of informal resolution process (including circumstances under which the party cannot resume a formal complaint arising from the allegations)
- Resulting consequences of participating (e.g., records)

Investigation

Written Notice of Allegations

- Written notice to known parties “upon receipt of written complaint”
- In sufficient time to allow respondent to prepare a response before any **initial** interview
- Must include:
  - Notice of grievance process, including any informal resolution process
  - Notice of allegations, in sufficient detail to allow respondent to prepare a response (names of known parties, conduct alleged, date and location of conduct, if known)

Written Notice of Allegations

- Must include:
  - Statement that respondent presumed not responsible and that responsibility determined at conclusion of grievance process
  - Notice of parties' rights to have an attorney or non-attorney advisor and to inspect and review evidence
  - Notice of any provision in the code of conduct that prohibits knowingly making false statements or providing false evidence during the grievance process
- Must be supplemented if new allegations opened for investigation

- Who should investigate?
- Can be the Title IX Coordinator… But should it?
- Trained
- Unbiased
  - No actual or perceived conflict of interest
  - Check “institutional interests”
  - Presumption that Respondent is not responsible

Investigation
34 C.F.R. 106.45(b)(5)

- Burden of proof on school
- Certain treatment records cannot be obtained without voluntary, written consent
- No restriction of rights of parties to discuss allegations or gather or present evidence
- Same opportunities for others present during interviews or related proceedings (e.g., attorney or non-attorney advisor)
- Written notice to parties of date, time, participants, purpose, and location of each investigative interview with sufficient time to prepare
- All evidence provided to parties and their advisors with 10 days to respond before report
- Written investigative report “fairly summarizes the relevant evidence” provided to parties and advisors at least 10 days before hearing or other determination of responsibility

Investigation Best Practices

- Coordinate with law enforcement if mutually agreed
- Consult with Title IX Coordinator and/or counsel as needed
  - Open-ended questions followed by more tailored follow up
  - Allow ample time, don’t interrupt or rush
  - Ask for other witnesses, evidence, incidents

Notice to Parties in Interviews

- What to expect about future contact (timing, updates, encourage follow-up to you)
- Written copy of policies/procedures
- Notify of retaliation rights – provide specific examples
- No “Gag” order but can warn of retaliation risks

Gathering Evidence

Gathering evidence

During an investigation complainants are required to provide evidence to support their allegations.

True or false?

During an investigation complainants are required to provide evidence to support their allegations.

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Medical Records

- Notice of allegations should not divulge either party's medical information
- Prohibited from accessing or using medical, psychological, or similar records in grievance process without a party's (or parent's) voluntary, written consent

Opportunity to Review Evidence

- Before the investigatory report is completed, evidence relating to the allegations must be sent to each party and advisor and should include <u>all evidence</u> (including that which the school does not intend to rely upon and exculpatory and inculpatory evidence)
- Parties have 10 days to provide a written response

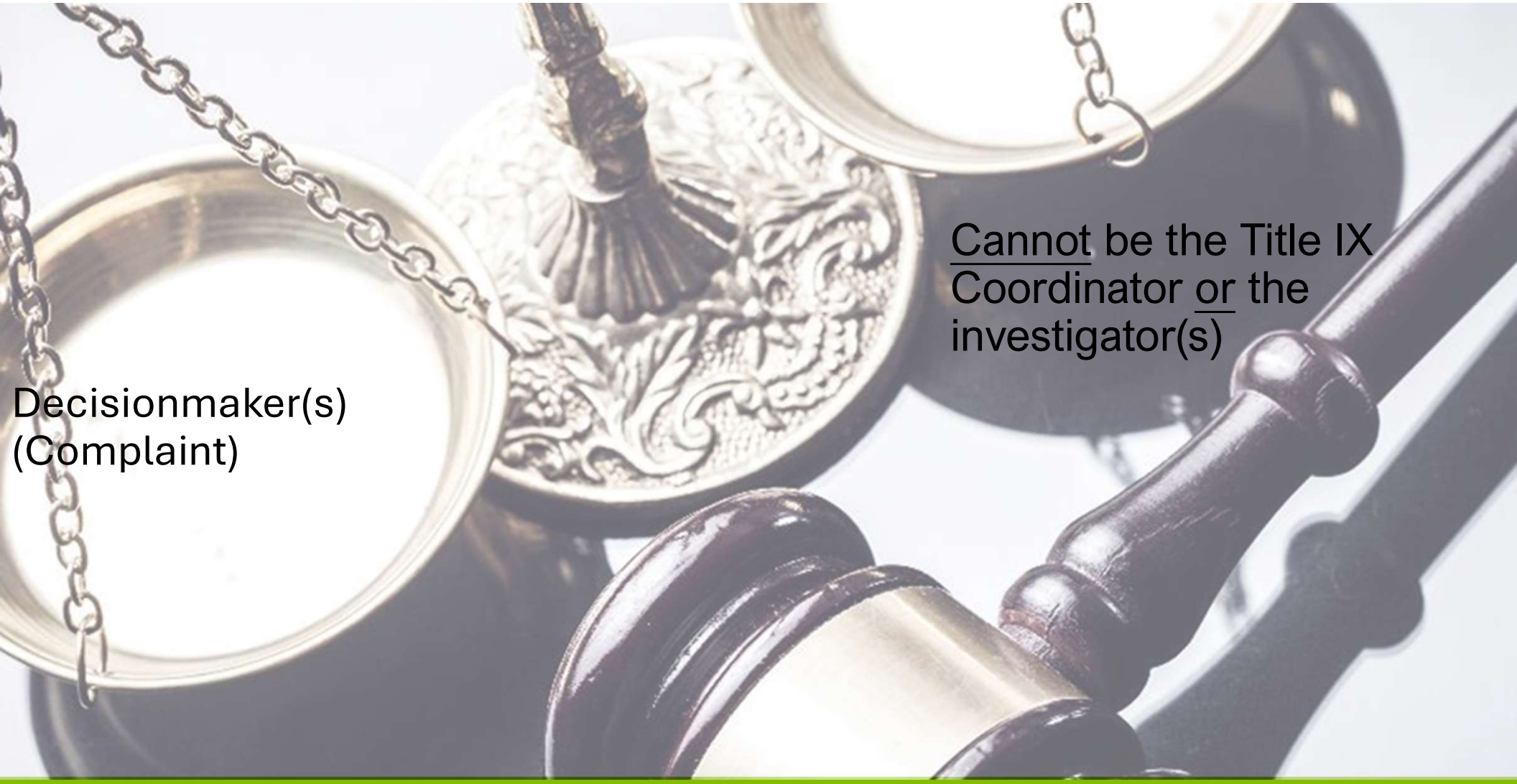
Investigation Report Writing

- Fairly summarizes the relevant evidence
- Provide the report to the parties and their advisors, if any, for their review and written response, at least 10 days before a hearing or determination of responsibility

Investigative Report Should Include

- Applicable policies and procedures
- Timeline of investigation
- Description of allegations
- Unbiased summary of evidence gathered, including interviews
- Facts need for credibility determination(s)

Decision



Decisionmaker(s)
(Complaint)

Cannot be the Title IX Coordinator or the investigator(s)

Determinations of Responsibility 34 C.F.R. 106.45(b)(6)

- Hearings permitted for K-12, with each party allowed to submit written, relevant questions to be asked of another party or witness to the decisionmaker, who will provide each party with the answers and the opportunity for follow-up questions
- Live hearing with live cross by party advisors required for higher ed, **not K-12**

Title IX Relevancy Exclusions

- Complainant's sexual predisposition and sexual behavior
- Treatment records
- Legally privileged information
- Improper inference

Evidence of Complainant's Sexual Predisposition & Behavior Excluded

- Questions and evidence about the complainant's sexual predisposition are excluded as irrelevant.
- Questions and evidence about a complainant's prior sexual behavior are not relevant unless such questions and evidence are offered to (1) prove that someone other than respondent committed the conduct, or (2) if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respondent and are offered to prove consent. 34 C.F.R. § 106.45(b)(6)(i)-(ii).

Rulings on Relevance in Written “Cross”

- Provide reasoning for irrelevance
- Admit and consider all relevant evidence
- Exceptions
  - Sexual behavior (except in limited situations)
  - Legal privilege
  - Treatment records

The Decision

When one party makes an allegation and the other party denies the allegation, there is no way to discern the truth.

True or false?

When one party makes an allegation and the other party denies the allegation, there is no way to discern the truth.

Start the presentation to see live content. For screen share software, share the entire screen. Get help at **pollev.com/app**

Written Determination

Identify	Identify the allegations
Describe	Describe procedural steps taken
Cite	Cite potential policy violations
Summarize	Fairly summarize all relevant evidence
Provide	Provide statement of result, with rationale, for each allegation
Appeal	Appeal procedures

Standard of Proof: Preponderance of the Evidence

Remedies & Sanctions

- Disciplinary action against respondent
- Counseling for respondent/victim
- Changes to services or policies
- Remedies for complainant and others
- Etc.!!

Factors for Evaluating Evidence

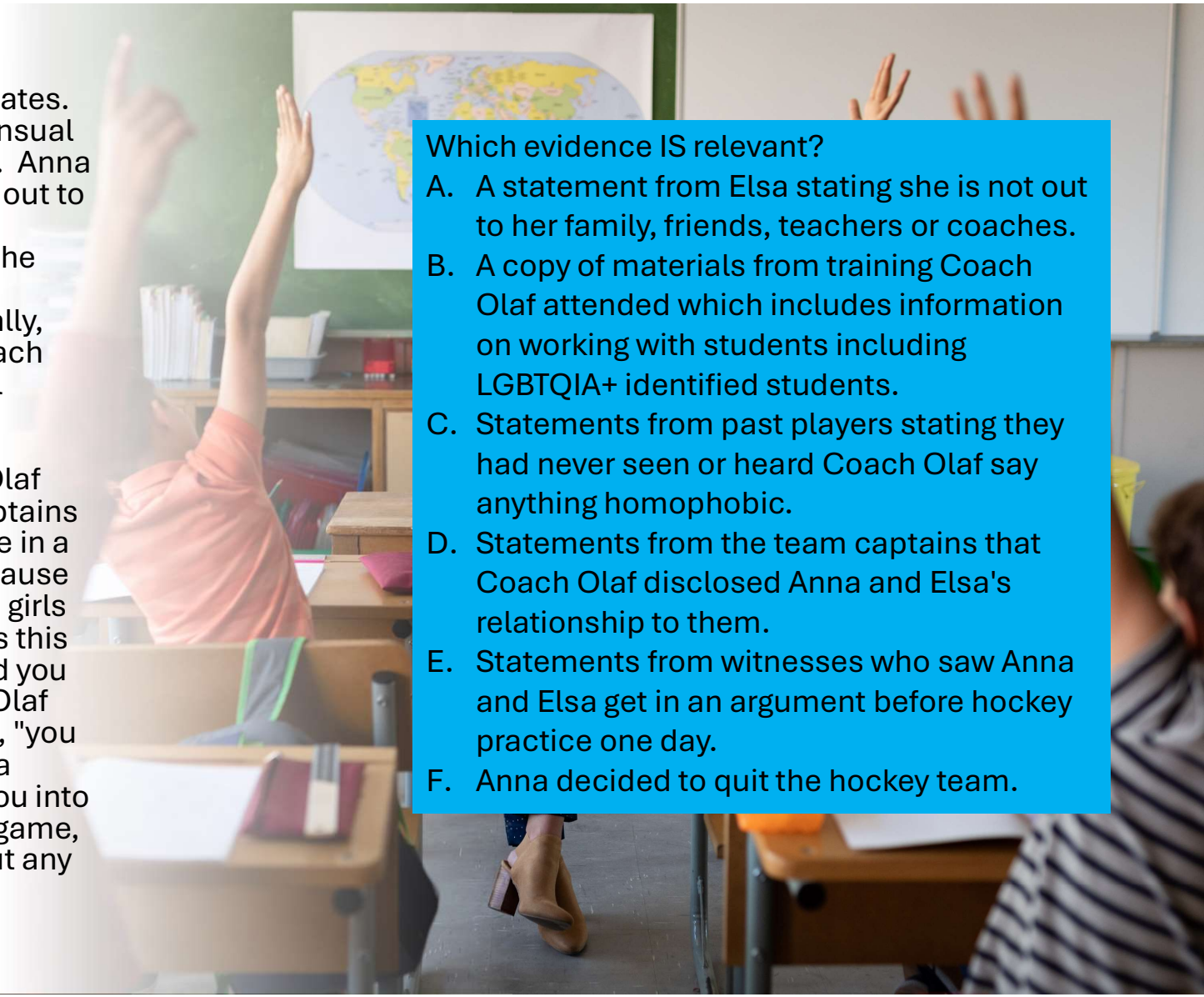
- Weight of Evidence
  - Weight of evidence is the believability or persuasiveness of evidence in probative value, not the quantity or amount of evidence.
  - Evaluate evidence as a whole based on your own judgment.
- Assessing Credibility: The extent to which the decisionmaker can rely on testimony to be accurate and helpful in their understanding of the case.
- Inherent plausibility: Is the testimony believable on its face? Does it make sense?
- Demeanor: Did the person seem to be telling the truth or lying?

Factors for Evaluating Evidence

- Motive to falsify: Did the person have a reason to lie? Is there evidence supporting an alleged motive to lie?
- Corroboration: Is there corroborating evidence or witness testimony? (E.g., witness who observed any of the conduct alleged, witnesses who either party soon after the alleged conduct, or witnesses who discussed with either party around the time the conduct allegedly occurred, or physical evidence)
- Past record: Prior conduct by respondent? History of similar behavior?
- None of the above factors are determinative as to credibility.

Anna and Elsa are hockey teammates. They have been in a secret consensual relationship for about six months. Anna identifies as a lesbian, and she is out to her friends, family, and teammates. Elsa isn't sure how she identifies yet, and she hasn't told anyone other than Anna. Eventually, Anna and Elsa reluctantly tell Coach Olaf that they are in a consensual relationship.

The next day at practice, Coach Olaf meets privately with the team captains and tells them, "Anna and Elsa are in a relationship, and this is going to cause real problems. You know how you girls fight, and the last thing we need is this kind of drama on the team. I need you to keep an eye on them." Coach Olaf also pulls Elsa aside and tells her, "you know, this thing with Anna is just a phase, don't let her manipulate you into thinking you are gay." At the next game, Coach Olaf benches Anna without any reason.



Which evidence IS relevant?

A. A statement from Elsa stating she is not out to her family, friends, teachers or coaches.
B. A copy of materials from training Coach Olaf attended which includes information on working with students including LGBTQIA+ identified students.
C. Statements from past players stating they had never seen or heard Coach Olaf say anything homophobic.
D. Statements from the team captains that Coach Olaf disclosed Anna and Elsa's relationship to them.
E. Statements from witnesses who saw Anna and Elsa get in an argument before hockey practice one day.
F. Anna decided to quit the hockey team.

Which evidence is relevant?

A 0%

B 0%

C 0%

D 0%

E 0%

F 0%

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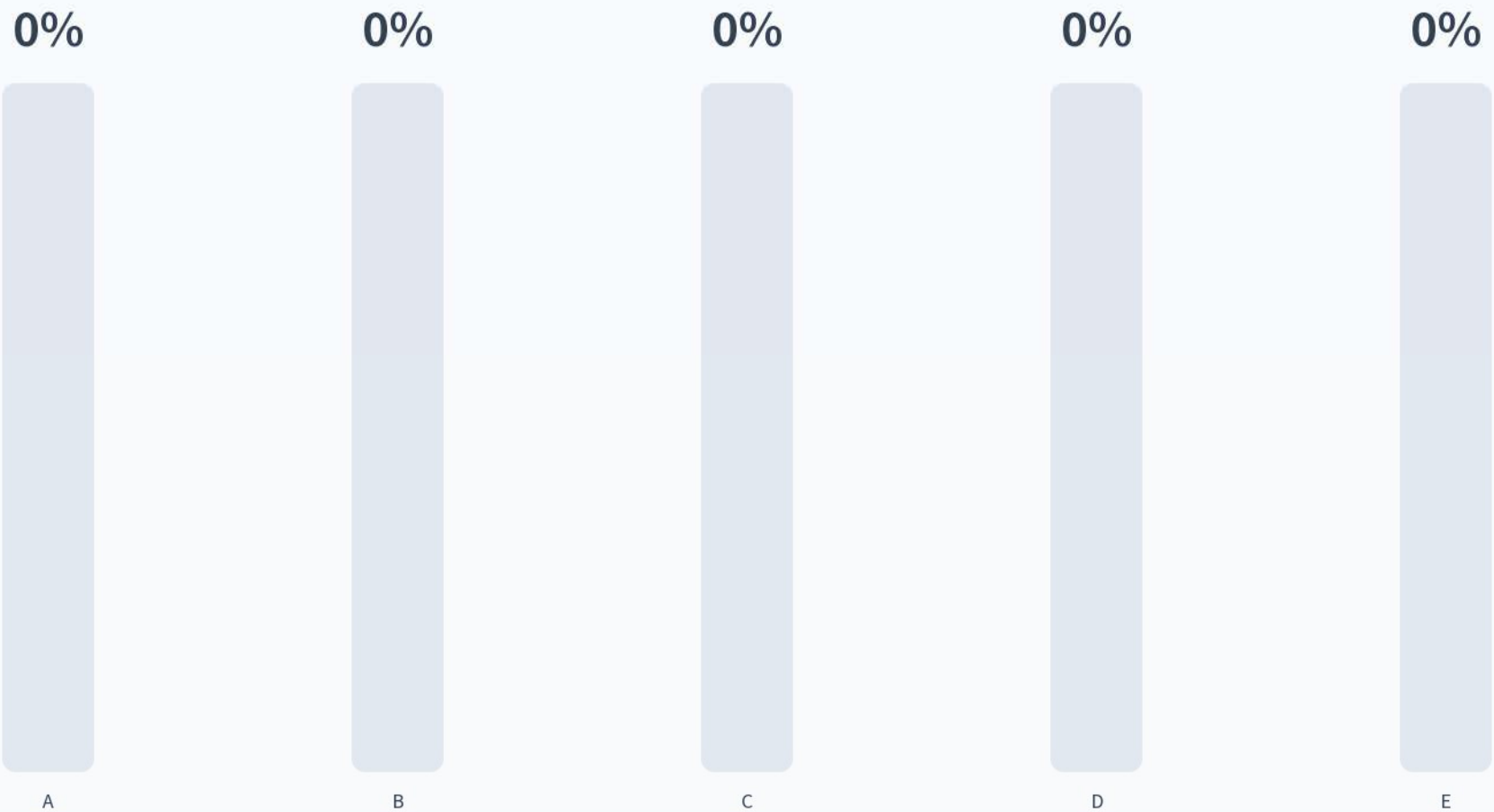
While Shawn and Ari were dating, Shawn took pictures of Ari naked. Ari agreed to Shawn taking the photos after Shawn promised never to show anyone the pictures.

About a week after Ari broke up with Shawn, someone with the email address, Goose2002@woohoo.com, sent a group text to Ari and 28 other students from school which included pictures of Ari taken by Shawn.

Which evidence is relevant?

A. Shawn's iPhone
B. Ari's best friend's statement stating Ari immediately regretted letting Shawn take the photos.
C. A statement from Shawn's friend Bec stating that three weeks before the phots were shared, Ari wore a shirt that said, "free the nipple!"
D. A statement from Shawn's friend Bec that when Ari and Shawn were dating, Ari told Shawn and Bec that Ari "wanted to start an OnlyFans account because it would be hot to have random people see me naked."
E. Emails from Shawn using the same email address.

Which evidence IS relevant?



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Credibility Considerations

- Consistency
- Accuracy
- Memory
- Implausibility
- Inconsistency
- Unreliability
- Ulterior motives
- Opportunity/ability of witness to observe or know things testified
- Interest in outcome
- Bias or prejudice
- Contradictory evidence
- Reasonableness in light of all evidence
- Any other factors that bear on believability

Appeal

Appeal Process

- Available to both parties
- Appeal of dismissal or written determination
- Three bases for appeal
  - Procedural issue
  - New Evidence
  - Bias or Conflict of Interest
- Must affect the outcome

Appeal Process

- Notify parties of appeal in writing
- Apply procedures equally for both parties
- Provide equal opportunity to submit written statement
- Issue written decision to both parties

Appeal Decisionmaker(s)

Cannot be the Title IX Coordinator or the investigator(s) or the decisionmaker (complaint)

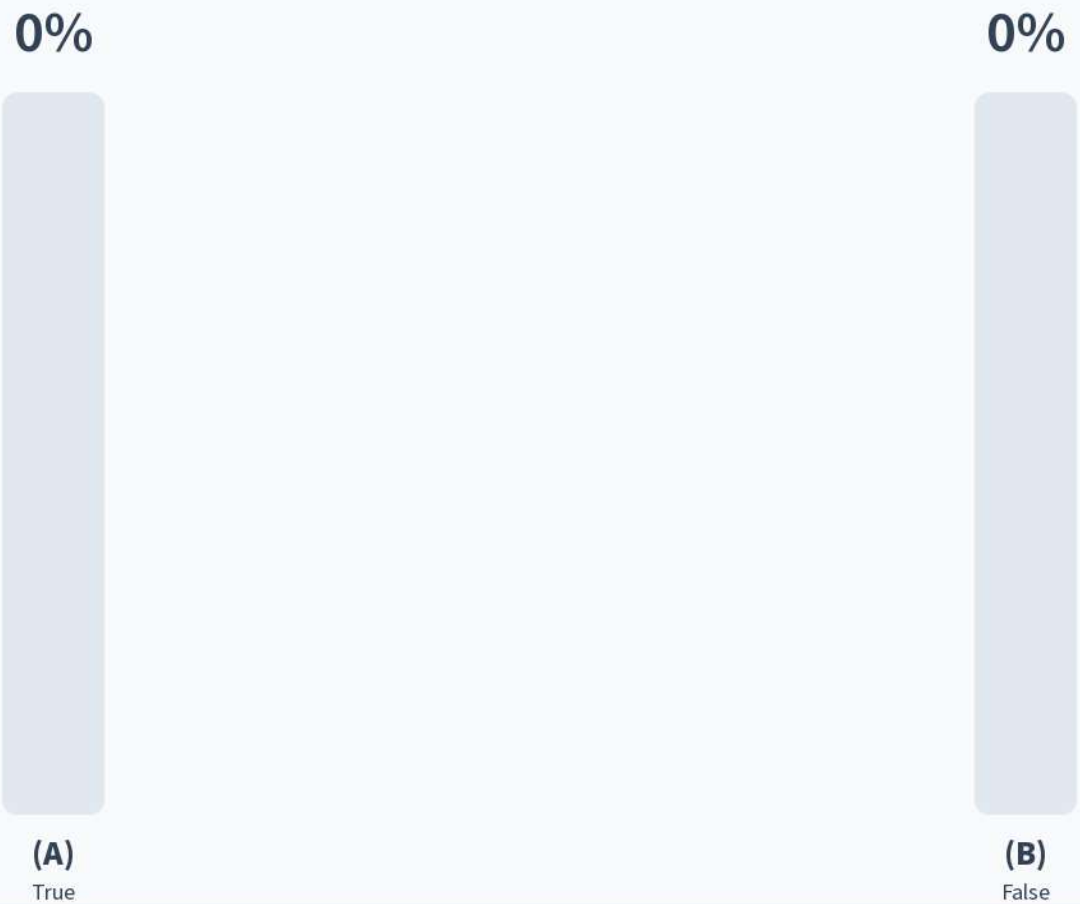
Bias, Conflicts of Interest, and Other Fairness Concerns

Tissues

In preparing for an interview with Complainant, Investigator moves the box of tissues from the bookshelf to the table near where Complainant will be sitting for the interview. Before interviewing witnesses, Investigator moves the tissues back to the bookshelf.

Investigator's actions reflect a lack of impartiality. **True or False?**

Investigator's actions reflect a lack of impartiality. True or false?



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Bias, Conflict of Interest, Prejudgment

The Title IX Coordinator, investigator, decision-maker, or informal resolution facilitator must not have a conflict of interest or bias for or against Complainants or Respondents generally or for or against any individual Complainant or Respondent. And that they must not prejudge any matter before them.

Bias

- Prejudice for or against one person or group
- An affinity or habitual attraction to something
- The property of not being in balance
- A particular point of view from which something is seen or presented

Wordhippo.com

Conflict of Interest & Prejudgment

- A conflict between the private interests and the official responsibilities of a person in a position of trust

Merriam-Webster.com

- Prejudgment is a judgment made before the evidence has been presented

Wordhippo.com

Avoiding Prejudgment

- Keep an open mind throughout the investigation process
- Wait until you have all facts and evidence (there are two or more sides to every story)
- Seek additional facts and/or witnesses – facts are your friends!
- Be particularly cautious about checking your assumptions in situations involving sexual assault, drugs, or alcohol use

Recordkeeping

Recordkeeping

Must maintain the following for 7 years:

- Sexual harassment investigation documents, including:
  - Determination regarding responsibility
  - Recordings or transcripts of live hearing
  - Disciplinary sanctions imposed on Respondent
  - Remedies provided to Complainant
- Appeal and result
- Informal resolution and result
- **Actions taken in response to a report of sexual harassment**
- Actions taken in response to a formal complaint of sexual harassment

Recordkeeping

Responses to formal and informal complaints and actions taken in response should include:

- The basis for the school's conclusion that its response was not deliberately indifferent
- Documentation that it has taken measures designed to restore or preserve equal access to the school's education program or activity
- Supportive measures or if no supportive measures are provided, document the reasons why such a response was not clearly unreasonable in light of the known circumstances

QUESTIONS?

Areas of Service

- Business
- Communications & Media Relations
- Education Technology
- Employment Law
- Facilities & Construction
- Governance & Leadership
- Government Affairs & Public Policy
- Interscholastic Activities
- Investigations
- Labor Relations & Negotiations
- Litigation
- Next Level Client Services
- Real Estate & Property
- Special Education
- Student Rights & Discipline
- Title IX
- Virtual Learning

F3 Law

Business
Communications & Media Relations
Education Technology
Employment Law
Facilities & Construction
Governance & Leadership
Government Affairs & Public Policy
Interscholastic Activities
Investigations

Labor Relations & Negotiations
Litigation
Next Level Client Services
Real Estate & Property
Special Education
Student Rights & Discipline
Title IX
Virtual Learning

Inland Empire
Fresno
Los Angeles
Midwest
Oakland
Sacramento
San Diego

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