



Connecticut Association of Boards of Education

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PRESENTS POLICY HIGHLIGHTS

May 17, 2024

Title IX Implementation Game Plan

In a recent webinar titled “Key Things to Know About the New Title IX Regulations,” The Superintendents Association (AASA) presented Holly McIntush, Thompson & Horton and Jackie Gharapour Wernz, Education Civil Rights Solutions to share an overview of the changes in the Title IX Regulations going into effect on August 1st of this year. As districts will continue to receive information on these changes over the next several weeks, I thought the section of this presentation, “Your Game Plan,” would provide districts with a plan to adequately prepare for the policy/regulations changes before them. This is especially important considering the aggressive time line for implementation.

May 2024

- Reevaluate Title IX team personnel
- Draft revised notice of nondiscrimination
- Identify all District policies, procedures, and notices (e.g., websites, handbooks) to update
 - For employees that may include:
 - Title IX
 - Anti-discrimination and harassment
 - Bullying, cyberbullying, dress codes, ethics, grooming, and other specific conduct policies
 - Grievance and appeals
 - Leave and termination
 - Pregnancy and parenting
 - Employee records
 - For students that may include:
 - Title IX
 - Anti-discrimination and harassment
 - Threat assessment
 - Student code of conduct (including bullying, cyberbullying, hazing, dating violence, dress codes)
 - Suspension, expulsion, and alternative placement
 - Grievance and appeals
 - Leave and termination
 - Pregnancy and parenting
 - FERPA/student records

- Identify source(s) for policy, procedures, and notice language. (The CAFE Policy Department is in the process of developing these models.)
- Develop plan for approving policies (consider interim policy approval options – Boards may need to abbreviate their deliberative practices to ensure timely adoption)
- Meet with stakeholders to address decision points regarding Title IX policy, procedures, and notices
- Prepare a training plan, including identifying the provider(s)
- Issue initial communication to the community
- Identify resources for Title IX Coordinators

June 2024

- If drafting your own policies, draft policies, procedures, and notices; if using an outside resource, consider whether to provide input/feedback on decision points
- If drafting your own policy, draft templates/forms
- Update notice of nondiscrimination in handbooks, CBAs, job applications, etc.
- Schedule/secure training for employees
- Provide rule update training for Title IX coordinators, deputy coordinators, and designees
- Prepare communications strategy for students, parents, and employees
- Identify lactation spaces and other available accommodations for pregnant and parenting students

July 2024

- Finalize all policies and procedures and templates/forms
- Provide practical training to Title IX team members on techniques, updated policies, procedures, and new templates/forms
- Publish updated notices of nondiscrimination, including in handbooks and on websites
- Make sure all Title IX personnel training is complete and you have your plan to train all employees
- Confirm record-keeping requirements are aligned
- Consider publishing notices for pregnancy and parenting (e.g., lactation spaces, right to request accommodations)

Hopefully, this timetable will help ensure the next three months, while challenging, are more manageable. The CAFE policy department will continue to provide updates and tools as they become available as we prepare/update relevant model policies, procedures, and notices.

As always, please feel free to contact us if you have questions or need any support.