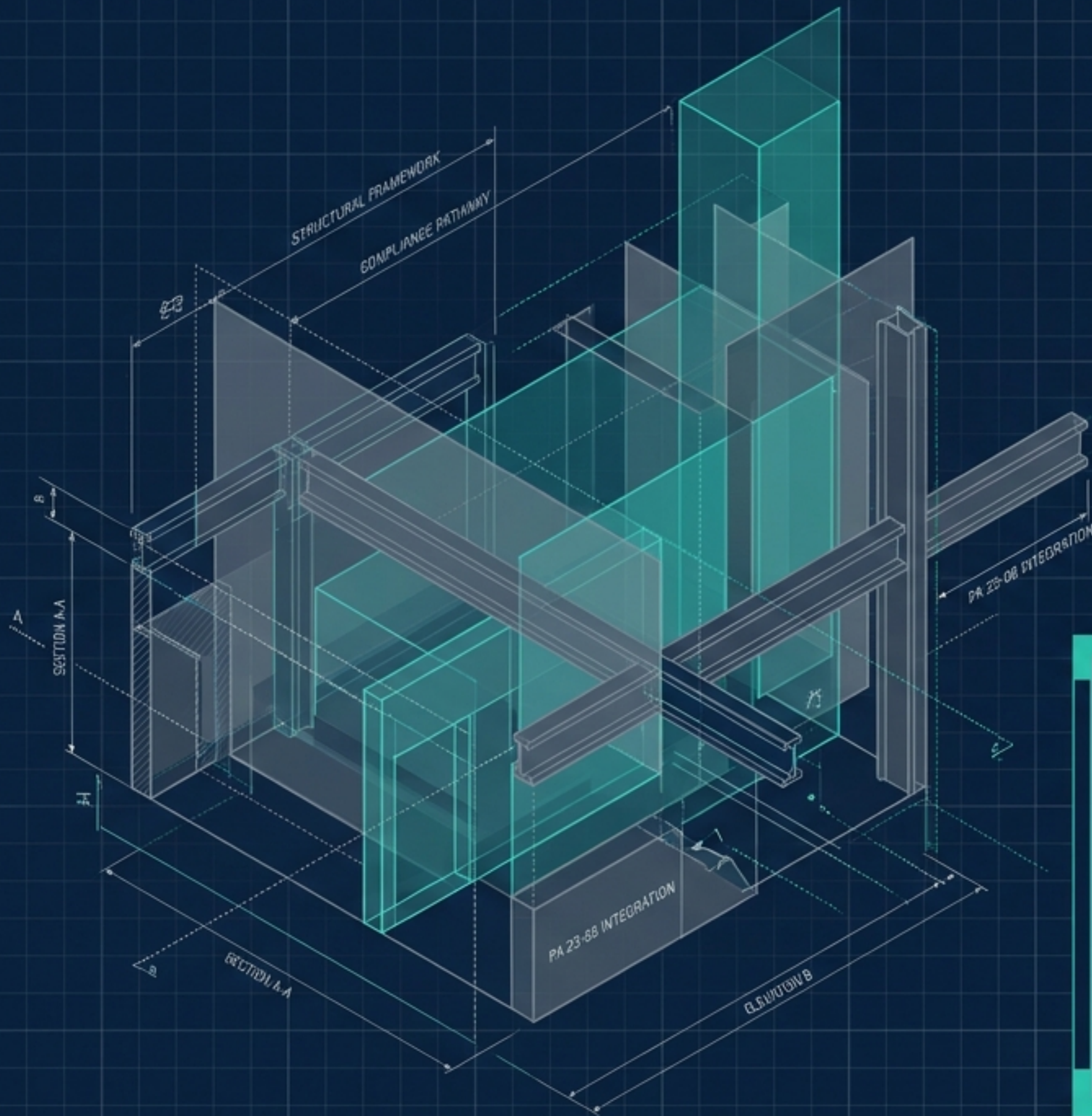




Title IX Compliance in Connecticut

Navigating the 2025 Legal Landscape
and PA 23-66 Mandates.

The Current Compliance Reality

STRUCTURAL
FRAMEWORK

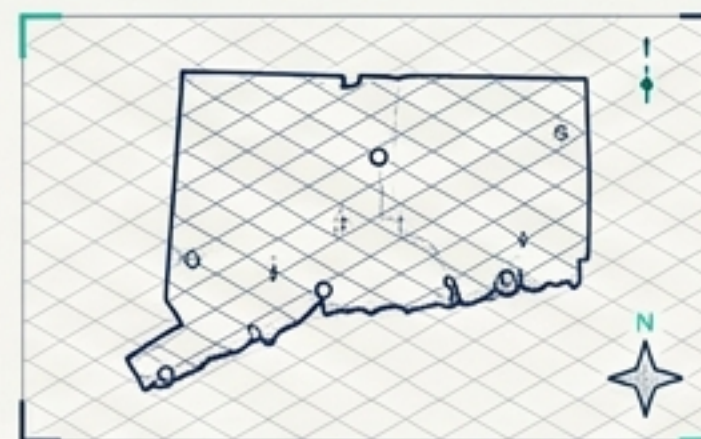


The Federal Reset

Reversion to 2020 Rules

Following a January 2025 nationwide injunction, the 2024 Title IX regulations have been vacated. Districts must immediately operate under the strict 2020 framework.

RESET
PROTOCOL



The State Mandate

PA 23-66 Implementation

Connecticut districts face imminent, mandatory deadlines to adopt the State Department of Education's comprehensive Title IX Compliance Toolkit starting in the 2025–2026 school year.

COMPLIANCE
INTERFACE

STATE-LEVEL
INTEGRATION

The Federal Whiplash and the Return to 2020



Pre-2020

August 1, 2020

August 1, 2024

January 9, 2025

Present

Administrative guidance only; no binding federal regulations.

2020 Regulations take effect. Introduction of detailed grievance processes and "actual knowledge" standards.

2024 Regulations roll out. Broader jurisdiction, fewer investigation requirements.

Federal District Court in KY vacates 2024 rules nationwide. OCR confirms 2024 rules are no longer effective.

Immediate Return to 2020 Regulations.



The Compliance Matrix: 2020 Reinstated



	2020 Regulations (ACTIVE)	2024 Regulations (VACATED)
Grievance Process	Detailed, rigid grievance process with specific, separated administrative roles.	Fewer strict investigation requirements; unified process.
Definition of Harassment	Narrow definition. Must be severe, pervasive, AND objectively offensive.	Broader definition encompassing expanded sex-based harassment.
Trigger for Action	District must have "Actual Knowledge" leading to "Deliberate Indifference" liability.	Broader duty to investigate conduct within programs/activities.

Connecticut Law Expands the Federal Baseline



CT State Law & Climate Laws

Explicitly protects students and employees against discrimination **based on sexual orientation** and **gender identity** and **expression**.

Federal Title VII

Protects employees against sex discrimination, which SCOTUS affirms includes **sexual orientation** and **gender identity**.

Federal Title IX (2020)

Prohibits discrimination on the basis of sex in **federally funded** education programs.

While reinstated 2020 Federal rules are narrower, CT state statutes and Title VII ensure protections for LGBTQ+ students and staff remain fully intact and enforceable.

The Data Driving the Mandate

14%

The percentage of Connecticut residents who report having **childhood sexual abuse**.

44%

The percentage of rape victims who are under the **age of 18**.

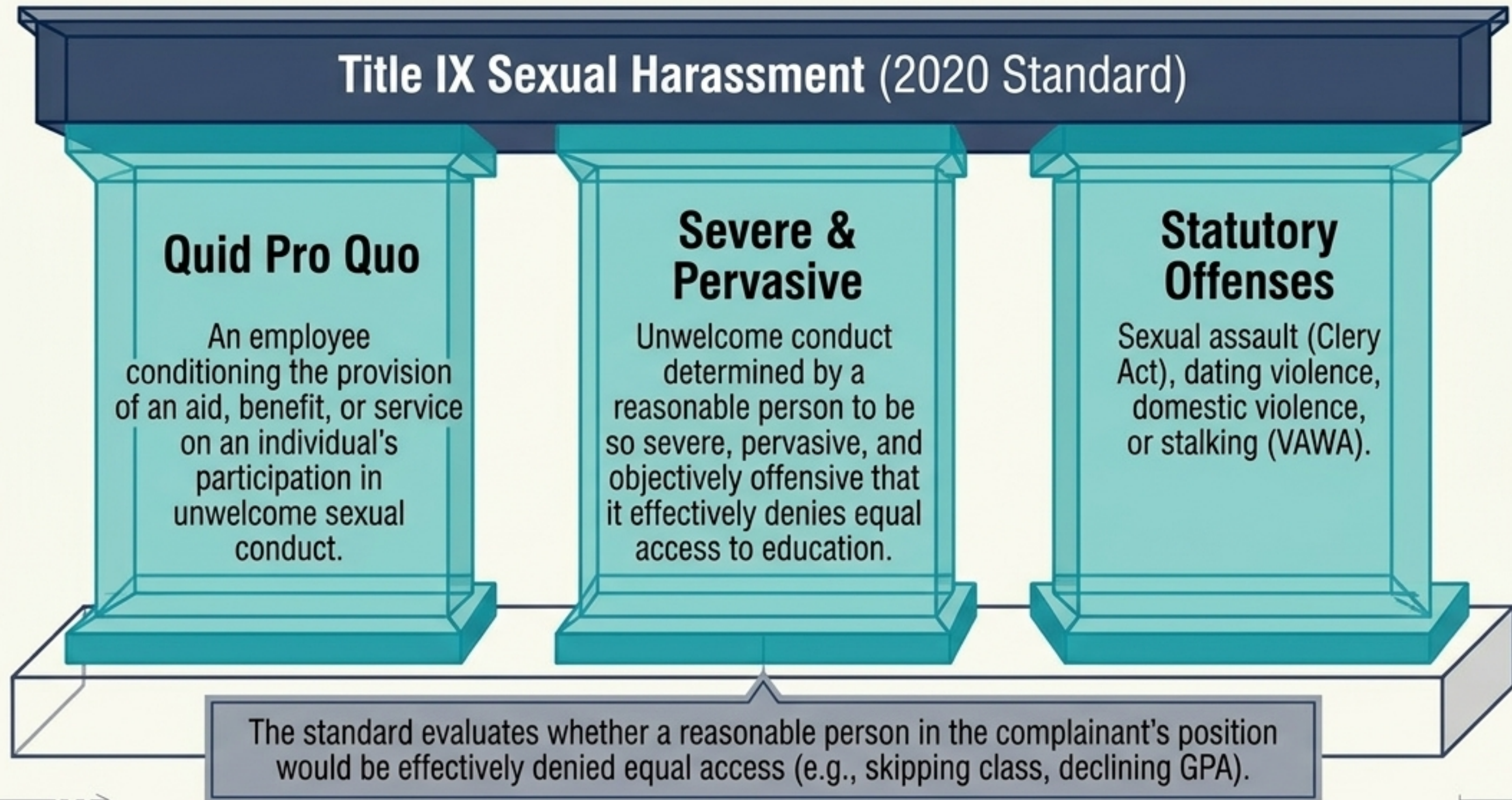
80% / 30%

The staggering rate of **women** (80%) and **men** (30%) with **intellectual disabilities** who

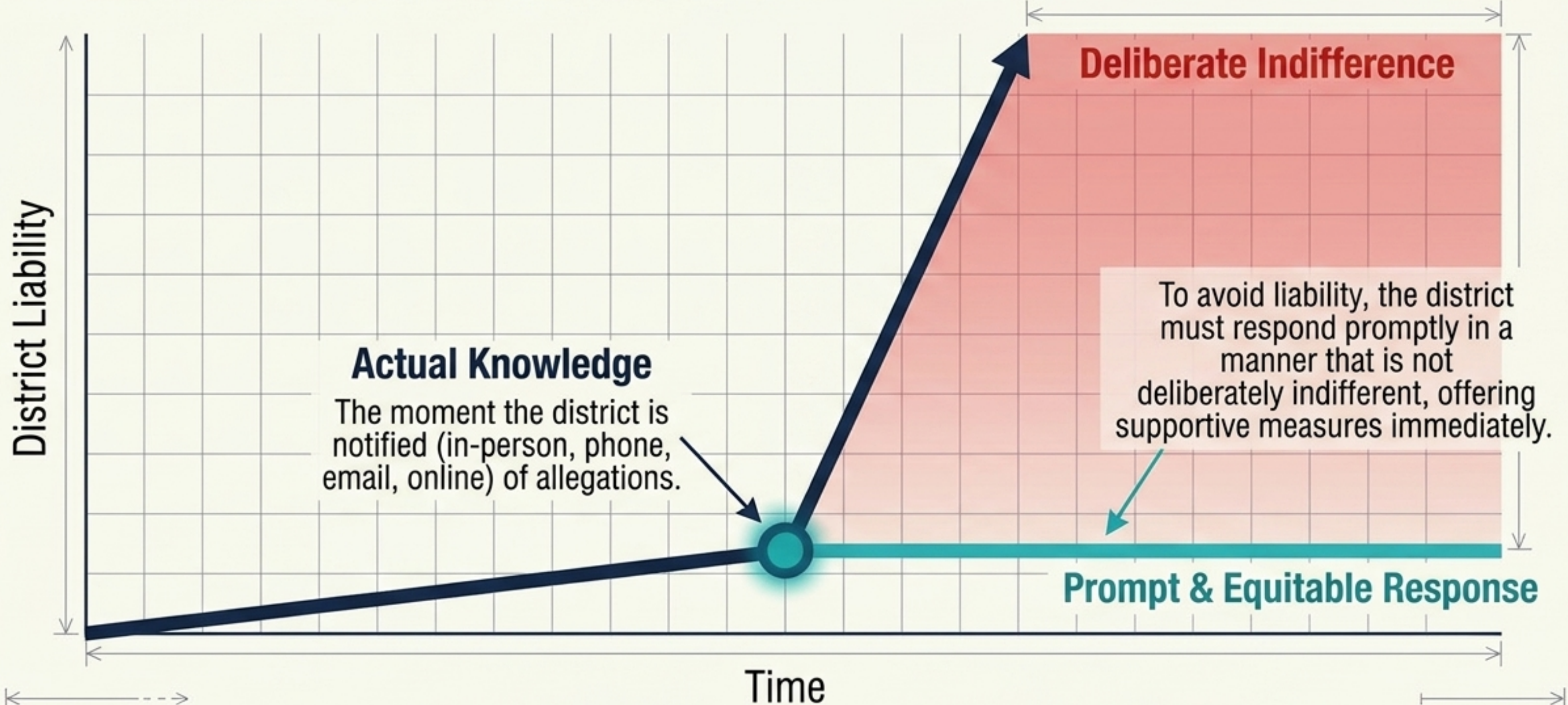
have been sexually assaulted, highlighting the unique risks for vulnerable student populations.

These realities necessitated the comprehensive Connecticut Title IX Toolkit (PA 23-66) to enforce prevention, identification, and rapid response.

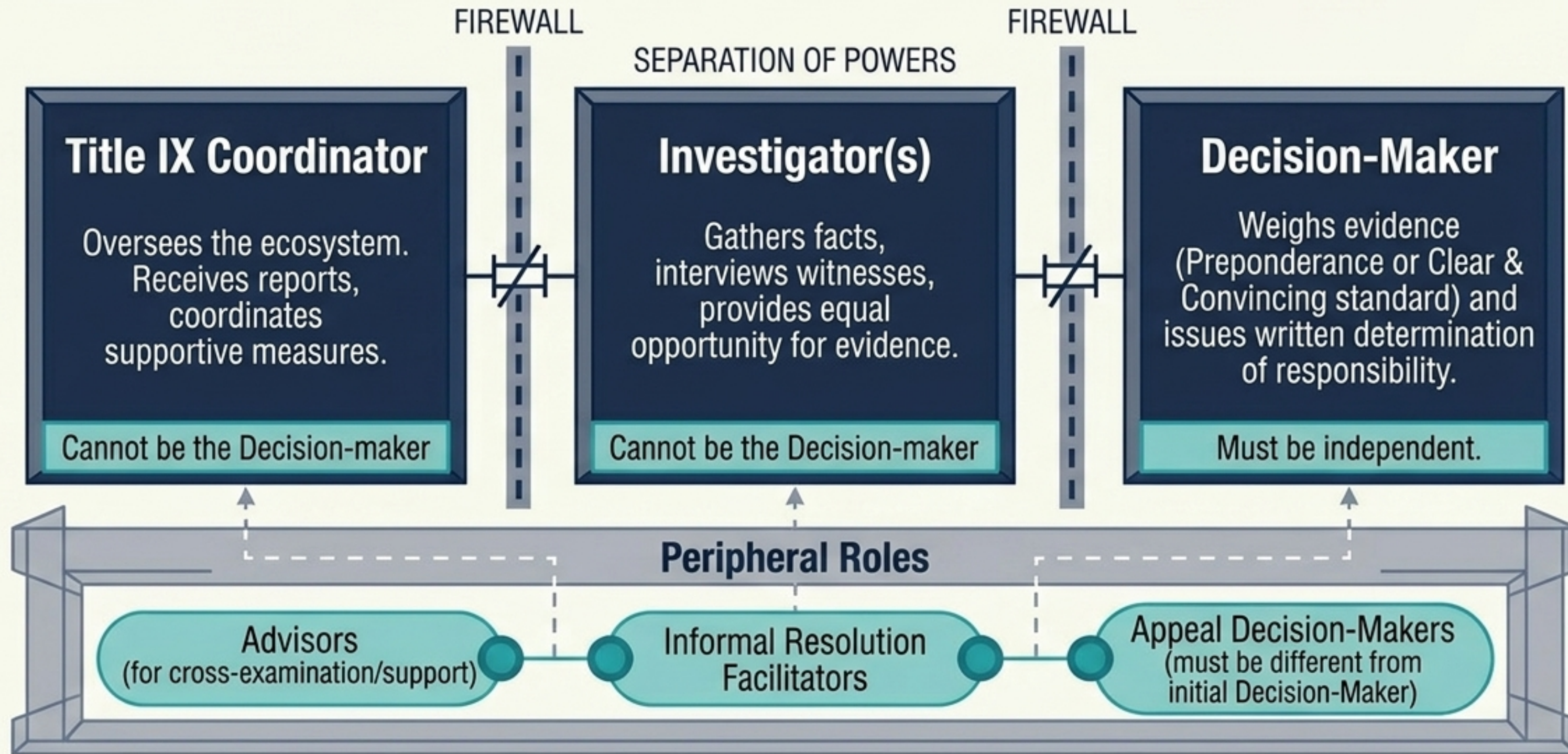
The Three Pillars of Title IX Sexual Harassment



The Trigger: Actual Knowledge & Deliberate Indifference



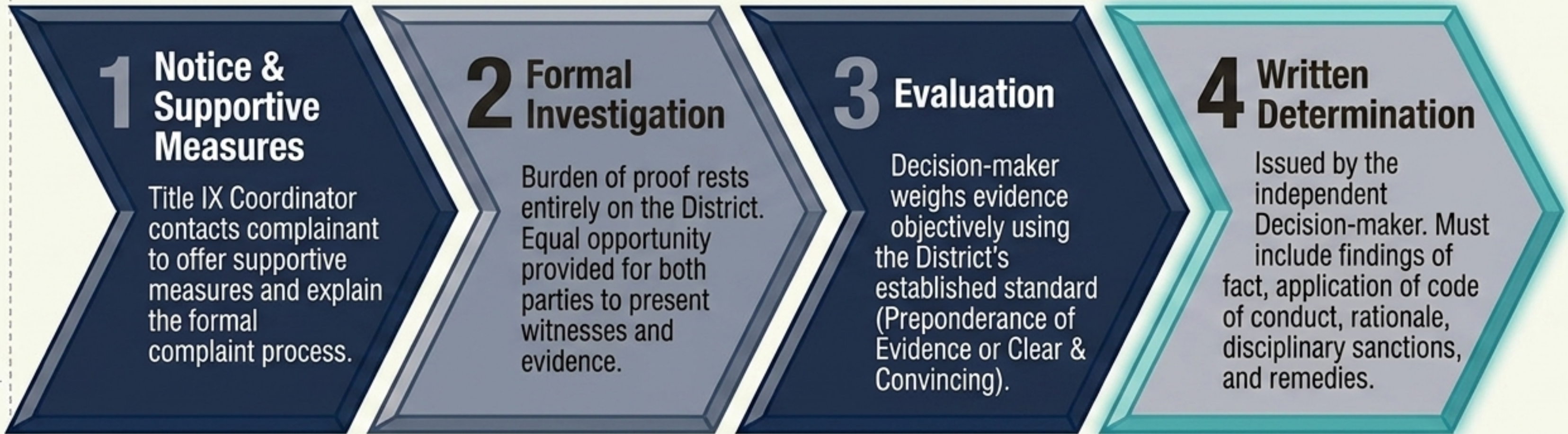
The Anatomy of a Title IX Team



Routing the Complaint: Process vs. Procedure

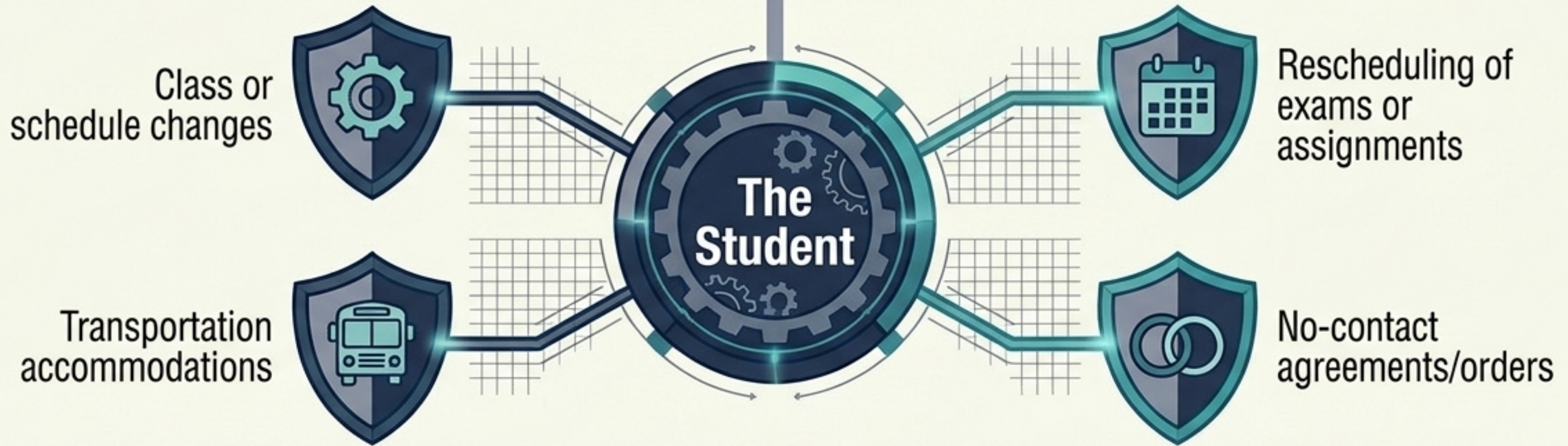


The Grievance Process Timeline



Supportive Measures: Preserving Educational Access

Individualized, free services offered to every complainant designed to restore or preserve equal access to education without punishing the respondent.



The Title IX Coordinator must contact the complainant to discuss these measures even if no formal complaint has been filed.

The Connecticut Mandate: PA 23-66 Timeline



July 2024 (Completed)

CWCSEO Working Group submits the Title IX Compliance Toolkit to the legislative Children's Committee.



October 1, 2024 (Completed)

State Dept. of Education (SDE) distributes the toolkit to local/regional boards and posts it online.



2025–2026 School Year (Action Required)

Mandatory Implementation. All local and regional boards of education must implement the toolkit to prevent, identify, and respond to abuse and discrimination.



2026–2027 School Year (Reporting Required)

Annual Compliance Reporting begins. Districts must submit data to SDE regarding Coordinators, training, policies, and resources used.

The PA 23-66 Toolkit Checklist



Comprehensive Training

-  • Mandatory training for all school employees, administrators, and students.
-  • Must cover prevention of adult sexual misconduct.
-  • Must address unique risks for students with disabilities and LGBTQ+ students.

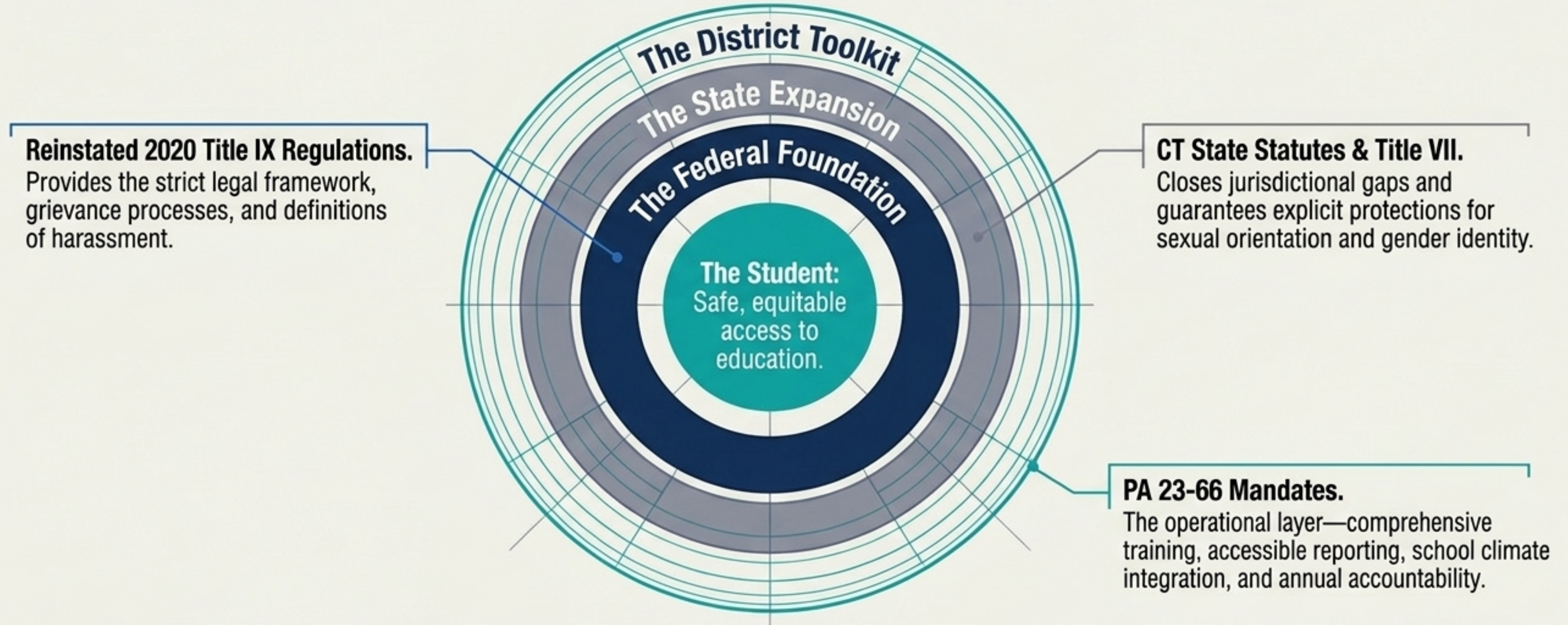
Policies & Procedures

-  • Adopt model anti-discrimination and abuse prevention policies (e.g., CAGE model).
-  • Integrate Connecticut School Climate policies to reduce challenging behaviors.
-  • Establish clear requirements for investigating adult misconduct and safety planning.

Accessibility & Reporting

-  • Publish clear complaint procedures accessible to students, parents, and staff.
-  • Provide information on seeking redress from the CHRO and OCR.
-  • Disseminate data from the CT School Health Survey and school climate assessments.

Building the Ecosystem of Protection



Compliance is no longer just navigating federal whiplash; it is engineering a resilient, unified culture of safety for every Connecticut student.