

Title IX Training

For All Employees



Educational Equity

- Pillar 1 - Student Success
- Pillar 2 - Employee Engagement
- Pillar 3 - Improvement



Adopted from Northern California Relief Training July 2023
Lozano Smith Training Sept 2020
Presented on July 28th, 2023 to BSD Management



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Elementary: 5th grade
Middle School: 8th grade
High School: 10th grade
Departments: Staff to Staff



Case Study Facts

Supervisor

Bella has reported to her assistant principal that a fellow student, Grayson grabbed her in the hallway, tried to kiss her on the mouth, grabbed her buttocks and touched her breasts over her clothing. Bella said there was no one in the hallway at the time that this happened.

co-worker

Break room

Break room

Findings of Fact



- Assume parties have opposed versions of the factual events
- What facts would be compelling to you as decision-maker in reaching a conclusion?
- Could you articulate these reasons in your outcome letter?



- **As to the allegation that _____, I find by a [preponderance of the evidence/clear and convincing standard] that _____.**
 - Address each allegation
 - Reasons why evidence supports the conclusion
 - Address disputed evidence
 - Details any questions raised by parties after reviewing report
- As a result of these determinations of responsibility, disciplinary sanctions will be imposed on Respondent. Specifically,
 - Insert here what discipline will be imposed on Respondent, if any.
- Additionally, remedies designed to restore/preserve equal access to the school's educational program or activity will be provided to Complainant and coordinated by the Title IX Coordinator.
 - *No requirement to specify what those remedies are under Title IX but including will cover UCP requirement.*

The Younger Victims of Sexual Violence in School

Conversations about Title IX tend to focus on college, but cases among K-12 students are abundant and often poorly handled.

- After telling school officials she was raped in the band room, Rachel Bradshaw-Bean was punished. Instead of receiving protection from leaders at her Texas high school, she was kicked out and shipped off to an alternative school—alongside the boy she said attacked her.
- In California, 13-year-old Seth Walsh killed himself after telling classmates he was gay. Walsh faced two years of relentless and escalating harassment after coming out, investigators said, but school officials failed to address the abuse until it was too late. In 2010, he hanged himself.

Note: In both of those cases, the K-12 school districts reached agreements with the U.S. Education Department’s Office for Civil Rights, after federal investigators found local education officials had failed their obligation to protect students from gender-based violence under Title IX, which prohibits sex discrimination in schools. In each case, district leaders promised they’d create new school policies to better protect student safety.



The Younger Victims of Sexual Violence in School

Conversations about Title IX tend to focus on college, but cases among K-12 students are abundant and often poorly handled.

- A Washington, D.C.-based senior attorney at Public Justice, Kimmel has for several years been representing sexual-violence victims, including a young Georgia woman who allegedly also faced retaliation for reporting an attack. Inside a Gwinnett County high school's newsroom, Kimmel said, a male classmate coerced the young woman into performing oral sex. After she reported the purported incident to school officials, she was suspended for engaging in sexual acts on campus. But first, Kimmel contended, educators grilled her client with bone-chilling questions: "What were you wearing?" "Why didn't you scream louder?"

Allegations of Hostile Environment under State Law



- **As to the allegation that _____, I find by a preponderance of the evidence that _____.**
- CA DEFINITION: unwelcome sexual advances, unwanted requests for sexual favors, or other unwanted verbal, visual, or physical conduct of a sexual nature made against in the educational setting, under any of the following conditions:
 - The conduct has the purpose or effect of having a negative impact on the student's academic performance or of creating an intimidating, hostile, or offensive educational environment (*definition abbreviated*)

Allegation of Sexual Harassment – Title IX and State Law Analysis



- **Sexual Harassment under Title IX includes sexual assault (sexual battery, fondling, etc.)**
- Sexual Battery is defined as:
Any person who touches an intimate part of another person while that person is unlawfully restrained by the accused or an accomplice, and if the touching is against the will of the person touched and is for the purpose of sexual arousal, sexual gratification, or sexual abuse, is guilty of sexual battery. *See, California Penal Code § 243.4(a).*

Hostile environment sexual harassment

- Prohibited sexual harassment includes, but is not limited to, unwelcome sexual advances, unwanted requests for sexual favors, or other unwanted verbal, visual, or physical conduct of a sexual nature made against another person of the same or opposite sex in the educational setting, under any of the following conditions:
...
 3. The conduct has the purpose or effect of having a negative impact on the student's academic performance or of creating an intimidating, hostile, or offensive educational environment.



Importance of Title IX in Today's K12 Schools

Overview



- Sexual violence, harassment and assault
- K12 school climate concerns
- Evolution of Title IX Law
- Intersection of federal law, state law, and other binding and non-binding guidance
- Current Title IX regulations
- Important role of Title IX Coordinator and other key Title IX roles on campus
- Practical application

Statistics on Sexual Assault



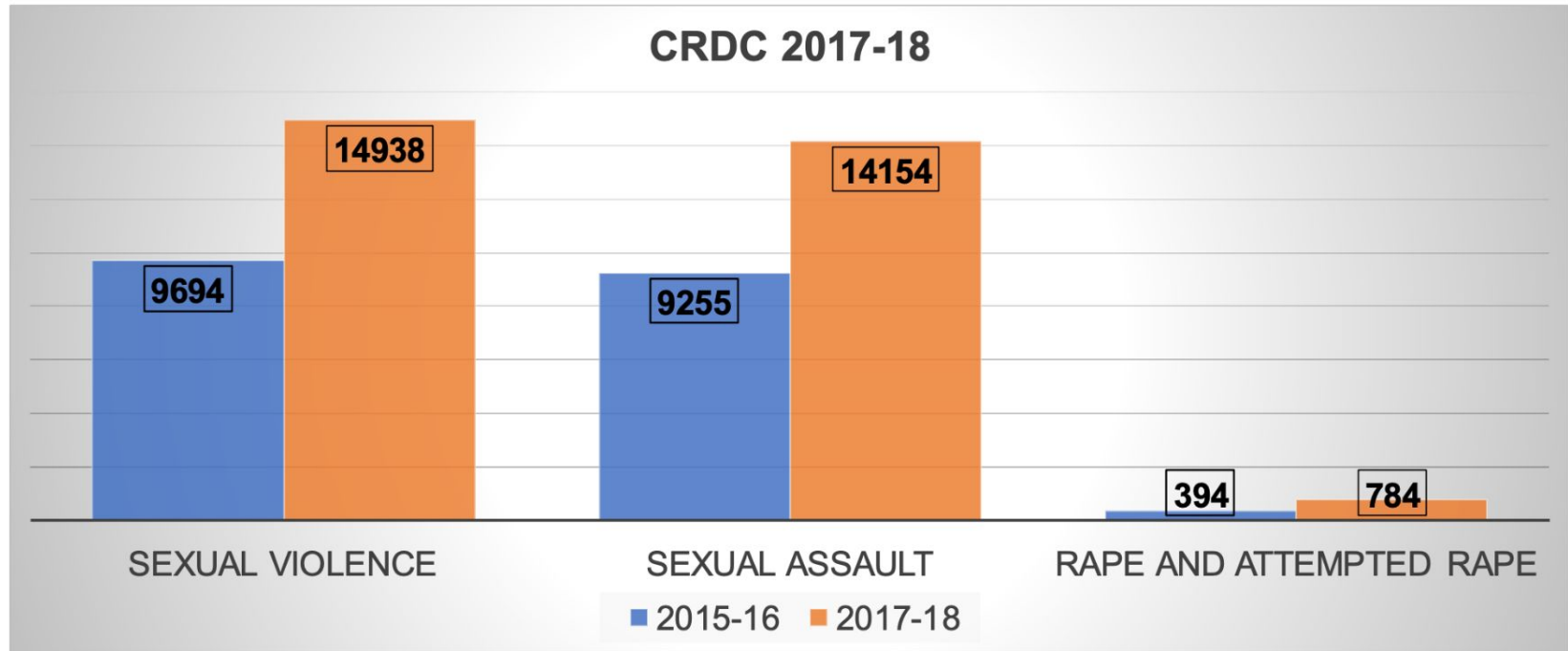
Notice & Wonder

- Somewhere in America, a woman is raped every 2 minutes.
- National surveys of adults suggest that between 9-32% of women and 5-10% of men report that they were victims of sexual abuse and/or assault during their childhood.
- 22% of victims were younger than age 12 when they were first raped, and 32% were between the ages of 12 and 17.
- LGBTQIA+ individuals experience sexual assault at higher rates than CIS-gender students
- Females of color experience sexual assault at higher rates than non-minority students
- The majority of male and female rape victims knew their perpetrator.
- Of surveyed college women, about 90% of rape and sexual assault victims knew their attacker prior to the assault.

Sexual Violence in Public K12 Schools



Notice & Wonder





- Walk-outs
- Instagram postings with accusations of sexual violence and allegations of school inaction
- Rape culture
- Harassment against students accused of wrongdoing
- College outreach to school districts

→ Influenced by COVID, accusations of rape culture, social media postings



Title IX Law and Regulation

Title IX Guidance



- Federal Law
- Regulations
- Other sources of mandatory and recommended guidance
 - State law
 - Case law
 - Advocacy
 - Best Practices

Title IX

"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."

- Title IX of the Education Amendments of 1972

Enforced by the Office for Civil Rights (OCR)



Title IX Law & Regulation Timeline



2011

OCR issues Dear Colleague Letter changing how campuses handle Title IX

2017

Department of Ed withdraws guidance and issues Q&As and starts NPRM process

2014

OCR issues additional guidance in response to outcry from schools

2020

New regulations issued and effective August 2020 amidst COVID

2022

Guidance and new NPRM process announced

Title IX Regulatory Guidance



- Regulations 2001
- Dear Colleague Letters
 - 2011 Dear Colleague Letter: Sexual Violence, Background, Summary and Fast Facts
 - 2014 Questions and Answers on Title IX and Sexual Violence
 - 2015 Dear Colleague Letter on Title IX Coordinators
 - 2016 Dear Colleague Letter on Transgender Students
 - 2017 Questions and Answers on Sexual Misconduct
- Regulations 2020
 - March 8, 2022 - Executive Order on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals
- New regulations will be released in October 2023

Title IX Regulatory Guidance - Report to OCR



- Following a report of sexual harassment to the Office for Civil Rights (OCR)
- OCR initiates an investigation
- OCR may seek an informal resolution
- Negotiated agreement is set forth in a resolution agreement
- OCR may impose fines and penalties against a school if resolution not reached



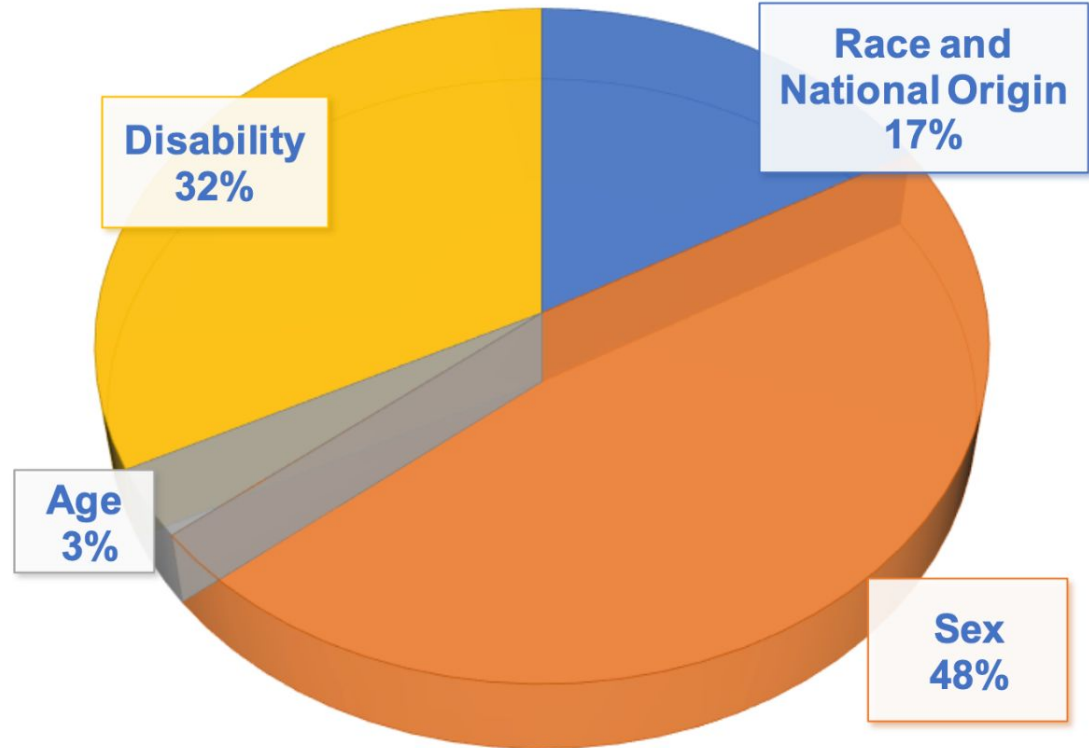
- Title IX protects against student sexual harassment set forth in Supreme Court decisions
 - Gebser v. Lago Vista Independent School District (1998)
 - Davis v. Monroe County Board of Education (1999)
- Litigation has clarified some of OCR's guidance and in some instances, overturned guidance
 - Examples include use of hearings, cross examination, and exclusion of evidence
- State law addressing specific, and, in some instances, controversial topics related to Title IX enforcement
 - Hearings
 - Transgender rights



OCR 2022 Report

Total Reports:
18,804

PERCENTAGE OF COMPLAINTS





- Consider campus needs and culture
- Legal obligations
- Advocacy groups
- Adopting practices
 - Trauma informed practices
 - Incorporate school culture
 - Reflect needs of your campus





Title IX Obligations for K12 School Districts

Title IX Covers



Title IX protects BOTH students and employees of K12 Schools

Sex discrimination

Sexual Harassment

Athletics

Sexual Assault

Pregnant Students

Recruitment/Admissions Programs

What Does Title IX Cover?

1. Education Programs or Activities
2. Sports
3. Employment
4. Equal Access to Facilities
5. Admissions and Recruitment
6. Sexual Harassment*

(34 C.F.R. Part 106)

*New regulations that have the full force and effect of law



What Could Happen if a District Fails to Comply with Title IX?



- Action for monetary damages
- Attorney's fees
- Loss of federal funding
- Resolution agreement with OCR

Why Title IX is Important - Potential Impact of Sexual Harassment on Students and Employees



- Shame, humiliation, stress, anxiety, depression, loss of sleep
- Impaired learning/poor work performance
- Absenteeism/turnover
- Culture of discrimination
- Civil liability (monetary damages, attorney fees)
- Negative media attention and public outcry
- OCR Resolution Agreement
- Loss of federal funds

Examples of “Red Flag” Conduct

- Flirtations or propositions
- Derogatory comments
- Sexual jokes or gestures
- Spreading sexual rumors
- Massaging, grabbing, or touching
- Comments on an employee or student’s body
- Sexual acts without consent or based on coercion
- Non-consensual “sexting”
- Sexploitation



Legal Obligation

Educational institutions must respond in a manner that is not **deliberately indifferent** when it has actual knowledge of sexual harassment occurring in the institution's education program or activity against a person in the United States.



Actual Knowledge of Sexual Harassment



- When sexual harassment or allegations of sexual harassment come to the attention of **ANY EMPLOYEE** of a K-12 district:
 - All employees **MUST** report to the **TITLE IX COORDINATOR**
- Failure to report could lead to an inadequate response
 - Proof of deliberate indifference
 - Legal responsibility for sexual harassment

Note:
**Staff must know who to report
to on campus & departments**

Scope of the Education Program or Activity



For Title IX to apply, the behavior must occur in the school's "education program or activity," further defined as:

locations, events, or circumstances over which the recipient exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and also includes any building owned or controlled by a student organization that is officially recognized by a postsecondary institution.

Off-campus activities covered if one (1) of three (3) requirements are met:

1. the off-campus incident occurs as part of the school's operations;
2. the school exercised substantial control over the respondent and the context of alleged sexual harassment that occurred; or
3. the incident of sexual harassment occurs at an off-campus building owned or controlled by a student organization officially recognized by a college



- A licensed mental health professional at the school can maintain confidentiality.
- All other employees are required to report the matter to the Title IX Coordinator.
 - Title IX Coordinator is responsible for ensuring a proper response.
- Failure to report to the Title IX Coordinator could lead to an inadequate response by the school and could be used to demonstrate deliberate indifference.
- In instances of potential sexual harassment, employees cannot offer to keep the matter confidential and must contact the Title IX Coordinator.

Other Employee Reporting Responsibilities

Mandatory Reporting



Mandatory Reporting

- Report to the appropriate agency when there is a reasonable suspicion that an ***abuse or neglect of a child*** may have occurred
- Child abuse is defined as physical abuse, neglect, sexual abuse and/or emotional maltreatment. This includes the sexual assault, sexual exploitation, and/or sexual abuse of a child; the willful cruelty or unjustifiable punishment of a child; incidents of corporal punishment or injury against a child; abuse in out-of-home care; and the severe and/or general neglect of a child.
- A child is a person under the age of 18.

Title IX Enforcement and Federal Constitutional Protections



Under Title IX, schools may not restrict the rights afforded under:

- First Amendment (Free Speech)
- Fifth Amendment (Protection against Self-Incrimination)
- Fourteenth Amendment (Due Process)

Title IX Prohibits Retaliation



- Prohibition against retaliation for any participant in the Title IX reporting & investigation process
- Requires some level of school action

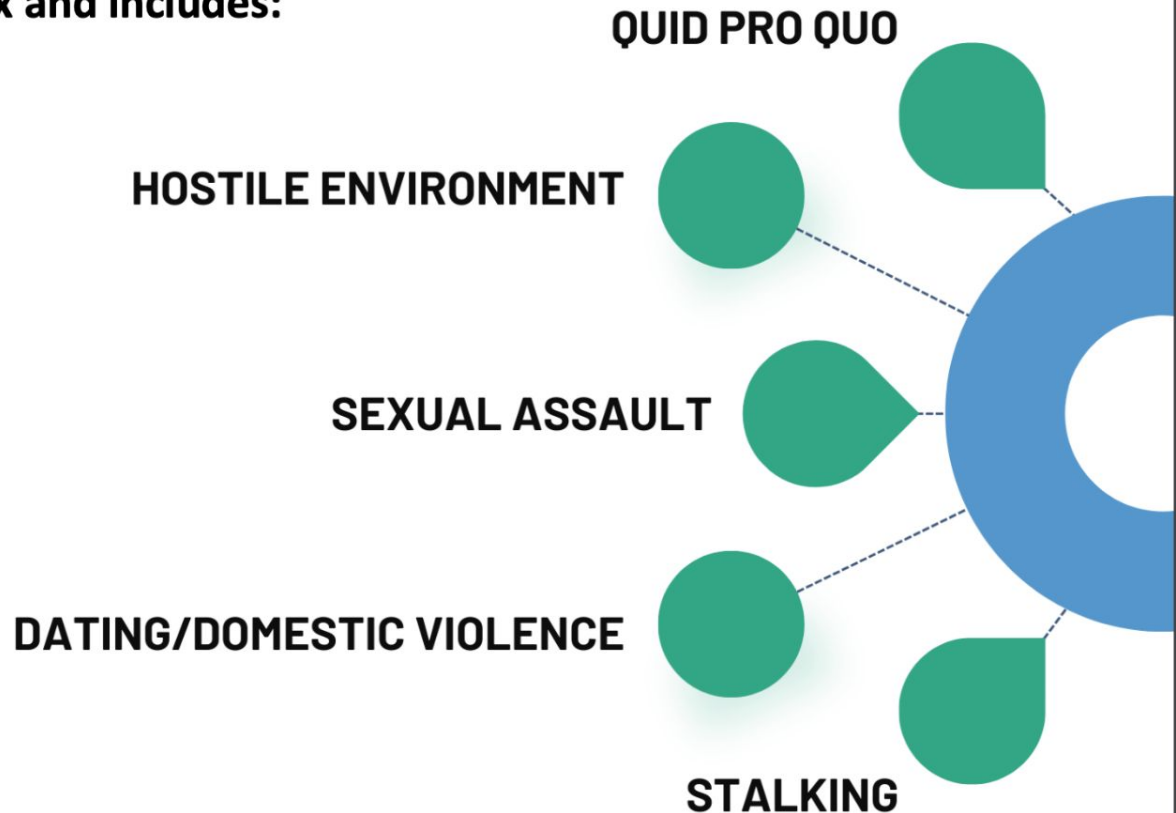


Title IX Sexual Harassment Definitions

Title IX (TIX) Definition of Sexual Harassment



Defined conduct on the basis of sex and includes:





Defines conduct “on the basis of sex” and includes:

- Quid pro quo - An employee of the school conditioning the provision of an aid, benefit, or service of the recipient on an individual’s participation in unwelcome sexual conduct;
- Hostile environment - 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;



The definition includes:

- **Sexual Assault** means any sexual act directed against a Complainant without consent. Sexual Assault includes fondling, incest, rape, sexual assault with an object, sodomy, and statutory rape.
- **Dating violence** means violence committed by a person— (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship. (ii) the type of relationship. (iii) the frequency of interaction between the persons involved in the relationship.



- **Domestic violence** includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim
 - It includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior,
 - By a person who— (A) is a current or former spouse or intimate partner of the victim; (B) is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner; (C) shares a child in common with the victim; or (D) commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.



- **Stalking** means engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
 - fear for his or her safety or the safety of others; or
 - suffer substantial emotional distress.

Note: Look for it on campus & Electronic

State Laws Prohibiting Sexual Harassment



- Aside from obligations under Title IX, K12 schools must also enforce state laws prohibiting sexual harassment
- Definitions of sexual harassment may be different
- In most instances, an incident will be analyzed under both Title IX and state law



Title IX Coordinator Role and Responsibilities

Designate a Title IX Coordinator



- Schools are **required** to designate at least one Title IX Coordinator for the school.
- The Title IX Coordinator is responsible for coordinating the school's effective response to instances of discrimination and harassment on the basis of sex.

Title IX Coordinator

Key Responsibilities



Overall Title IX compliance of programs/activities and report response

Central office for reports of sex discrimination and sexual harassment

Coordinate an effective response

- Respond to report
- Contact complainant
 - Supportive measures
 - Formal complaint process
- Manage the receipt of formal complaint and initiation of Title IX grievance process
- Determine if investigation is necessary in absence of formal complaint

TIX Obligations for TIX Coordinator - Coordinate the School's Response (2020 Regs)



- Receive reports of claims and potential claims
- Provide required notices
- Examine (and/or re-examine) and implement supportive measures
- Determine appropriateness of a potential removal proceeding
- Act as investigator in some instances
- Identify proper decision-maker
- Decide who will manage an appeal, if necessary
- Coordinate investigation, sharing of information between the parties, final outcome letter, and offering of appeal options
- Ensure proper documentation
- Provide training

Title IX Coordinator Responsibilities - Best Practices



- Coordinate the Title IX response on behalf of the school
- Monitor outcomes and identify patterns
- Adoption of Title IX policy and procedure
- Access to relevant data (i.e., participation, budgets)
- Information easily found online and in designated publications
- Permitted to conduct investigations
- Permitted to oversee investigations
- Avoid conflicts of interest, including exclusion from serving as the decision-maker
- Appropriate authority, qualifications, training, and time

Information about the Title IX Coordinator



Contact information for the Title IX Coordinator must be shared far & wide and include at minimum the following information:



Name of Title IX
Coordinator



School address
(with office address)



Phone Number



Email Address

Information about Title IX Coordinator



- Must be shared with:
 - Students
 - Parents
 - Employees
 - Applicants for admission
 - Applicants for employment
 - Unions and/or parties to collective bargaining agreements
- Notify the above individuals of non-discrimination statement of the school
- Information must include notice of grievance procedure
- Information must promptly display contact information on the school's website (if applicable) and in each handbook or catalog made available to those persons

Title IX – Parties and Administrators



Parties

- Complainant – alleged victim/survivor
- Respondent – responds to the allegation(s)

Other Participants

- Fact Witnesses
- Expert Witnesses

Administration of Claims

- Title IX Coordinator
- Title IX Investigator
- Title IX Decision-maker
- Title IX Appeal Officer
- Title IX Advisor
- Title IX Informal Resolution Officer



Title IX Grievance Process Requirements

Overview of Title IX Grievance Process (TIXGP)



- Respond promptly in a manner that is not deliberately indifferent
- Due process and fundamentally fair procedures to adjudicate the allegations
- Upon notification, supportive measures offered
 - Emergency removal
- Offer of formal process (upon signing of Formal Complaint)
 - Complainant files or Title IX Coordinator may file
- Both parties receive notice of the allegations
- Both parties participate in investigation and can inspect information gathered
- Separate decision-maker(s)
- Completed in a prompt time-frame
- Retaliation prohibited - define the retaliation complaint process



Executing the Title IX Grievance Process

TIXGP: Jurisdiction Defined



Occurring in the institution's education program or activity

- includes locations, events, or circumstances over which the school exercised substantial control over both the respondent and the context in which the sexual harassment occurred

Against a person in the United States



Mandatory dismissal

- Would not constitute sexual harassment as defined in regulations
- Did not occur in education program or activity
- Did not occur against a person in the U.S.

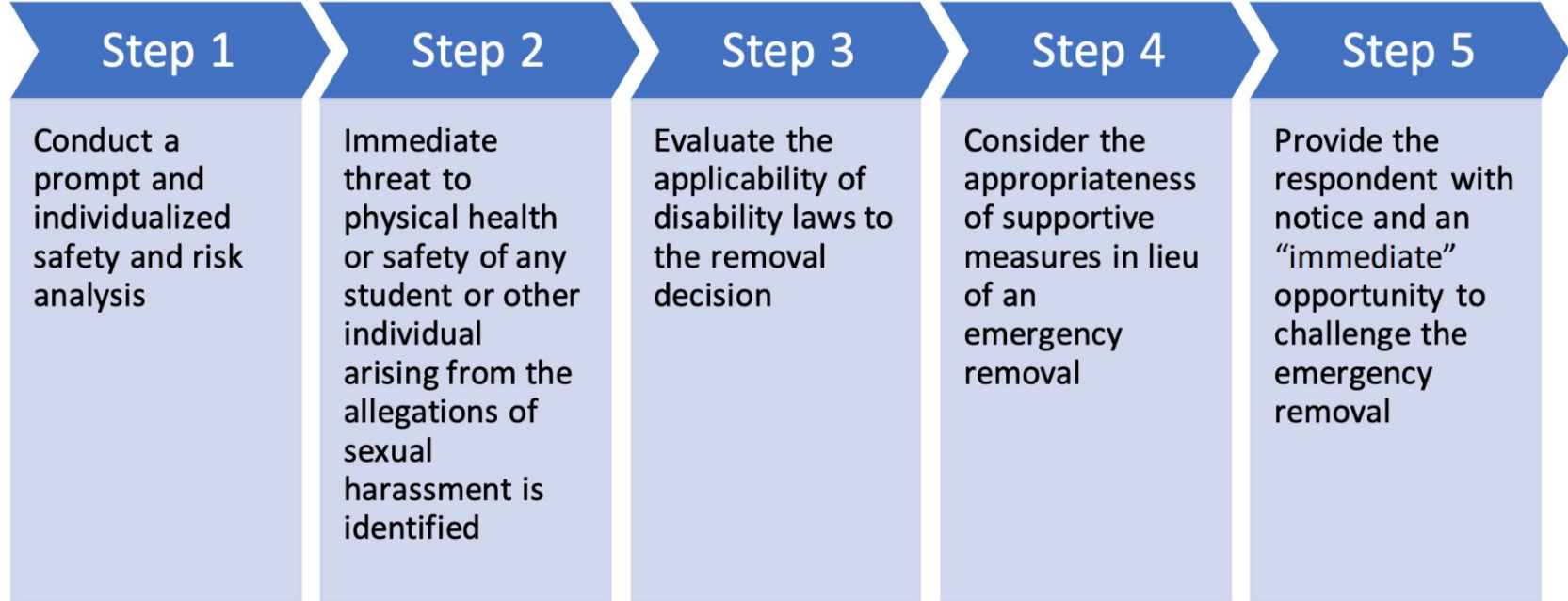
Permissive dismissal

- Complainant notifies Title IX Coordinator in writing that Complainant would like to withdraw formal complaint or allegations
- Respondent is no longer enrolled or employed by school district
- Specific circumstances prevent the school district from gathering evidence sufficient to reach a determination

TIXGP: Emergency Removal Procedure



Note:





Supportive measures are:

- **non-disciplinary, non-punitive** individualized services offered as appropriate, as reasonably available
- without fee or charge to the complainant or the respondent
- are designed to **restore or preserve equal access** to the District's education programs or activities
- without unreasonably burdening either party, including measures
- designed to protect the safety of all parties or the District's educational environment, or deter sexual harassment.

TIXGP: Offer of Formal Process



- Complainant offered formal process
 - Offer should be made to parents of minors
- Investigation process should be explained to complainant and parents
- Complainant must request an investigation
- Wishes of complainant are to be respected

TIXGP: No Formal Complaint Filed



Title IX Coordinator may decide to proceed with an investigation

- evidence of deliberate indifference if investigation not initiated

NOTE: Title IX Coordinator does not become Complainant



TIXGP: Notice of Allegations



- Detailed allegations against respondent
- Supportive measures offered to respondent
- No supportive measure can appear disciplinary or punitive in nature

TIXGP: Separate Investigator and Decision-Makers



- Title IX Coordinator may serve as investigator
- Title IX Coordinator may NOT serve as decision-maker to determine policy violation and discipline, or as the appeal officer
- Hearing panels permitted for K-12s but not required





Title IX Investigator Role and Responsibilities

Investigator Responsibility



- Serve objectively, impartially, without bias
 - Conflicts
 - Stereotypes
- Gather all information related to a claim
- Analyze
 - Relevancy
 - Authenticity
 - Credibility
- Connect to parties and witnesses
- Assist in maintaining legitimacy of the process
- Policy should define the INVESTIGATOR role

TIXGP: Investigation



- Investigator gathers relevant and irrelevant information
- All information must be shared with both parties
- Parties have ability to review investigation report and outcome, provide comments/written questions and provide answers and limited follow-up

TIXGP: Burden of Proof



- Preponderance of the evidence
- Clear and convincing



Title IX Investigator Report and Information Sharing



Before investigation report issued, all evidence shared

Opportunity to question and provide feedback

Draft investigation report issued and shared

Opportunity to question and provide feedback on
investigation report

Final investigation report issued



- Both parties are given the FULL investigation file to review
- Documents shared or document inspection
 - 10 days for parties to respond to the information
- Investigator prepares a draft investigation report and shares it with both parties
 - 10 days for the parties to respond to the investigation report
- Investigator prepares final investigation report and shares it with both parties and the decision-maker



Title IX Decision-Maker Role and Responsibilities in Title IX Grievance Process (TIXGP)



- Decision-maker provides the parties with the opportunity to send questions or comments
 - 10 days to respond
- Decision-maker must determine:
 - Policy violation
 - Discipline (if found in-violation of policy)
- Decision-maker issues an outcome letter to the parties
- In K-12, discipline decisions against students with disabilities may require a manifestation determination
 - A **Manifestation Determination** is a process, required by the Individuals With Disabilities Education Act (IDEA 2004), which is conducted when considering the exclusion of a student with a disability that constitutes a change of placement

Decision-Maker Role



- Review all evidence
- Issues decision relying on relevant, credible evidence
 - Policy violation – using policy definitions
 - Sanction/Discipline, if violation found
- Advises of appeal rights

- Can be more than one decision-maker
- Can never be Title IX Coordinator, Investigator, Appeal Officer

- **REVIEWS ALL EVIDENCE, DECIDES WHAT IS DISPUTE, (RE)EXAMINES THE DISPUTES, AND IN THE CONCLUSION, APPLIES THE STANDARD OF PROOF TO FACTS TO REACH A CONCLUSION ON POLICY VIOLATION AND DISCIPLINE**

Decision-Maker Potential Issues in TIXGP



Initial complaint – Title IX Coordinator

- Report of incident
- Formal complaint process offered
- Supportive measures
- Complaint filed/investigation initiated
- Potential dismissal (**Jurisdiction**, Allegation)
- **Notice of allegations**, includes a presumption of innocence

Investigation – TIX Investigator

- Interviews
- Documents reviewed
- Sharing information with both parties and reviewing feedback
- Completing investigative report
- Gathering feedback from parties on report

Decision-making – TIX Decision-Maker

- **Evaluate the evidence**
- **Determine if follow-up questions required**
- **Issue decision on policy violation and discipline**
- **Avoiding bias, conflict of interest, stereotypes**



Reaching a Conclusion and Issuing Outcome Letter

Decision-Maker Steps



- Receipt of final investigation report
 - *Is it finalized?*
- Outreach to parties to determine if follow-up questions are requested
 - Some discretion about submitting
 - Limited follow-up – facilitated cross-examination
 - Articulate and document decisions restricting this process
- Decision-maker discretion regarding about what follow-up is necessary
 - Decision-maker can ALSO conduct follow-up
- Outreach to parties with follow-up, as designated by decision-maker
- Conclusion and outcome letter

Final Decision Requirements



Under Title IX regulations, decision-maker must issue a written determination regarding responsibility that has to include

- Findings of fact
- Conclusions as to all allegations
- Rationale for reaching the decision
- Sanctions if the respondent is found responsible for policy violations must be included in the written determination
- Right to appeal

Others to consider:

- Allegations and Procedural Steps
- Categories that highlight compliance with state law (UCP)



Title IX

- Findings of fact
- Conclusions as to all allegations
- Rationale for reaching the decision
- Sanctions if the respondent is found responsible for policy violations must be included in the written determination
- Right to appeal

UCP

- Findings of Fact Supporting the Determination
- Conclusions and analysis of each allegations
- Corrective Actions
- Appeal Procedures

Notes: Components that need to be in the Letter



Procedural Review

Procedural irregularity in the Title IX grievance process that materially affected the outcome.

New Information

Newly discovered evidence that was not reasonably available at the time of the determination of responsibility or dismissal that could materially affect the outcome.

Conflict of Interest or Bias

Due to a bias or conflict of interest by the Title IX Coordinator, investigator, or decision-maker that materially affected the outcome.



- **Trained facilitators**
 - Offered after formal complaint is filed
 - Process must be detailed in writing
 - Described to both parties
 - Parties agree in writing
 - Either party may end informal resolution before a formal agreement is accepted
- **Never** available when complainant is student and respondent is employee



Other Title IX Obligations and Considerations

Conflicts of Interest



Relationship
to parties or
witnesses

Professional
conflicts

Personal
conflicts

Actual and
perceived



- Be a neutral – neither pro-Complainant nor pro-Respondent
- Consider all of the evidence as presented
- Maintain open mind regarding potential conclusions



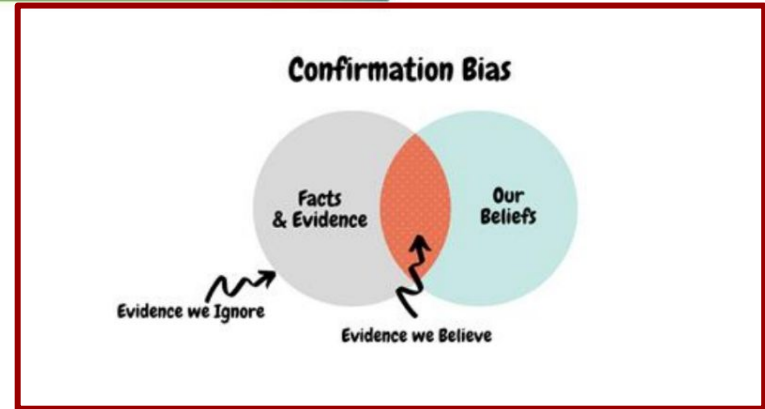
Stereotypes



- “A fixed, over generalized belief about a particular group or class of people.”
(Cardwell, 1996)
- Stereotypes around sexual assault
- Stereotypes around sexual harassment
- Complainant and Respondent



- Conscious/Explicit
 - Discriminatory intent
 - Stated preferences
- Unconscious/Implicit
 - For the most part, most people are unaware of these drivers
 - Developed over a period time and can influence many factors in hearing
 - Short cuts developed by the brain and often play a role in:
 - Immediate response to conflict
 - Often mimics fear responses





- Many Title IX cases involve trauma
- Title IX Coordinators should understand the impact of trauma on:
 - Reaction to trauma
 - Ability to capture memories
 - Recollection of memories
- Expectations around victim/survivor of trauma



Campus Title IX Training Programs



Groups to Consider

Title IX Office

Administrators

Teachers

Classified Staff

Specific Groups: Mental Health Professionals, Special Ed

Students

Volunteers

Conclusion



- The obligations for Title IX compliance in K12 school districts are vast, complicated, and frequently changing.
- An effective and empowered Title IX Coordinator is integral to achieving Title IX compliance for districts.
- A healthy and dynamic Title IX compliance program ensures that all students will continue to have access to their education programs and activities, even in the aftermath of sexual harassment.
- Title IX Coordinators engage in valuable efforts to reach this goal.



Thank You!

www.titleixconsult.com



Administrators & VPs share Title IX potential cases

Dr. Soria stated there were “zero” Title IX cases

Disciplinary action was taken on the ones that
violated Disciplinary CA Ed Code



Title IX

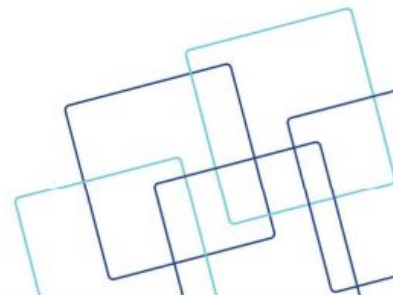
Responding to and Investigating Complaints of Sexual Harassment

What Everyone Needs to Know



Title IX: Responding to and Investigating Complaints of Sexual Harassment

Lozano Smith Webinar
September 10, 2020



Definitions

Complainant

- An individual who is alleged to be the *victim of the conduct* that could constitute sexual harassment

Respondent

- An individual who has been reported to be the *perpetrator of conduct* that could constitute sexual harassment

Formal Complaint

- A document filed by a *complainant* or signed by the *Title IX Coordinator* alleging sexual harassment against a respondent, and requesting that the district investigate the allegation

Actual Knowledge (K-12)

- When *any employee* has notice of sexual harassment or allegations of sexual harassment



Title IX Jurisdiction

Allegations of sexual harassment fall under Title IX when:

- The conduct occurs against a person *in the United States*;
- The conduct occurs in an education program or activity over which the district exercised *substantial control* over both:
 - 1) the *respondent* and
 - 2) the *context* in which the sexual harassment occurs; and
- The complainant was *participating/attempting to participate in* the educational program or activity at the time the complaint was filed.



The Roles and Responsibilities of District Administrators and Employees



Responsibilities of the Title IX Coordinator:

- Provides or coordinates Title IX trainings and preventative measures
- Offers supportive measures to complainant and respondent
- Explains the complaint/grievance process to the complainant
- Receives all complaints and oversees the complaint/grievance or informal resolution process
- May sometimes investigate complaints, but is never the decision-maker
- Determines mandatory and discretionary dismissals
- Evaluates corrective actions
- Addresses patterns or problems

District- Dr. Soria/Dr. Leyva
School Site- VPs
Departments- Leads



Responsibilities of the Investigator:

**District- Dr. Soria/Dr. Leyva
School Site- VPs
Departments- Leads**

- Administers a fair investigation of formal complaints
 - Interviews parties and witnesses
 - Reviews evidence
 - Provides parties the opportunity to inspect, review, and respond to all evidence gathered, and considers their responses
 - Creates an investigative report that summarizes relevant evidence
- Does not make a determination of responsibility
- Must be trained
- Must be impartial, unbiased, and free of any conflicts of interest

Responsibilities of the Decision-Maker:

**District- Dr. Leyva/Dr. Soria
School Site- Principals
Departments- HR**

- Reviews the investigation report, but does not investigate
- Gives parties the opportunity to submit written relevant questions for the other party/witnesses, and asks those questions they deem relevant or provides an explanation as to why a question was deemed irrelevant
- Makes a determination about responsibility
- Prepares the written determination that is issued to each party
- May recommend sanctions and/or corrective actions

Responsibilities of the Informal Resolution Officer:

- Facilitates the informal resolution process
- Trained, unbiased, and without conflict
- May be the **Title IX Coordinator** or another unbiased party
- Verifies a complaint meets the criteria for informal resolution, and that the parties have given voluntary, written consent
- Ensures the parties know their rights, including their right to withdraw at any time prior to a resolution being reached

District- Dr. Soria/Dr. Leyva
School Site- VPs
Departments- Leads

Responsibilities of the Appeals Officer:

**District- Dr. Soria/Dr. Leyva
Departments- HR**

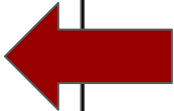
- Evaluates any appeal request made by the complainant or respondent
- Makes a decision on the appeal and issues a written decision to each party that states the decision and rationale
- Must be unbiased and without conflict
- Cannot be the Title IX Coordinator, investigator, or decision-maker



Responsibilities of All Employees:



- All employees must report to the Title IX Coordinator, and/or any additional designated individuals (school site administrators), any known claims of potential sexual harassment.
- All employees should be trained on how to identify potential sexual harassment issues and report them.



Beginning of the school year Staff Meeting Agenda Item: Title IX Reporting & Process


Title IX and Overlapping Obligations




- Contacting Law Enforcement
- Mandated Reporter Duties
 - “Reasonable suspicion” of child abuse or neglect

Criminal Investigation

1. A police investigation does *not* relieve a district of its obligations under Title IX or state laws
2. What if law enforcement is involved?
 - A brief delay is permissible, but it is not good cause to delay sending the written notice of the investigation
 - Criminal reports may be useful for fact gathering
 - Coordinate with local law enforcement



Prevention:
Training, Notice and
Posting Requirements



Prevention

Taking the right proactive measures is just as important as how you respond.



Prevention



- ✓ Adopt appropriate written policy
- ✓ Publish and disseminate the policy
- ✓ Designate a Title IX coordinator
- ✓ Train the Title IX team, staff and students

Title IX Notice/Posting Requirements

- Notice of Title IX rights must be given to all employees, students, and applicants
- Must be posted in a *prominent* location on the district's *website*, and in each *handbook* or catalogue that it makes available to persons entitled to notification
- Training materials must be posted online – 7 years



Title IX Notices Must Include:

- Contact information for the Title IX Coordinator
- A statement that the district does not discriminate on the basis of sex in the education program or activity that it operates, including in employment, and that it is required by Title IX and specifically Section 106.8(b) not to discriminate in such a manner
- That inquiries about the application of Title IX and Section 106(b) may be referred to the Title IX Coordinator, to the Assistant Secretary of Education, or both
- The district's complaint/grievance procedures and process, including:
 - how to report or file a complaint of sex discrimination,
 - how to report or file a complaint of sexual harassment, and
 - how the district will respond



Retaliation Prohibitions

- Retaliation is prohibited against anyone who has attempted to participate in the Title IX process.
- The district cannot use the student conduct process as a way to avoid the Title IX complaint/grievance process.
- Retaliation complaints must be filed under the same complaint/grievance process.
- The district must keep the identities of all involved parties confidential, unless disclosure is required by law or necessary to carry out Title IX proceedings.
- Exercising a First Amendment right is not retaliation.
- Charging an individual with making a false statement in bad faith during a Title IX process is not retaliation.



Burton Title IX SH Policy & Investigation Process

Review Documents in Folder

- Title IX BSD AR/ BP Policies

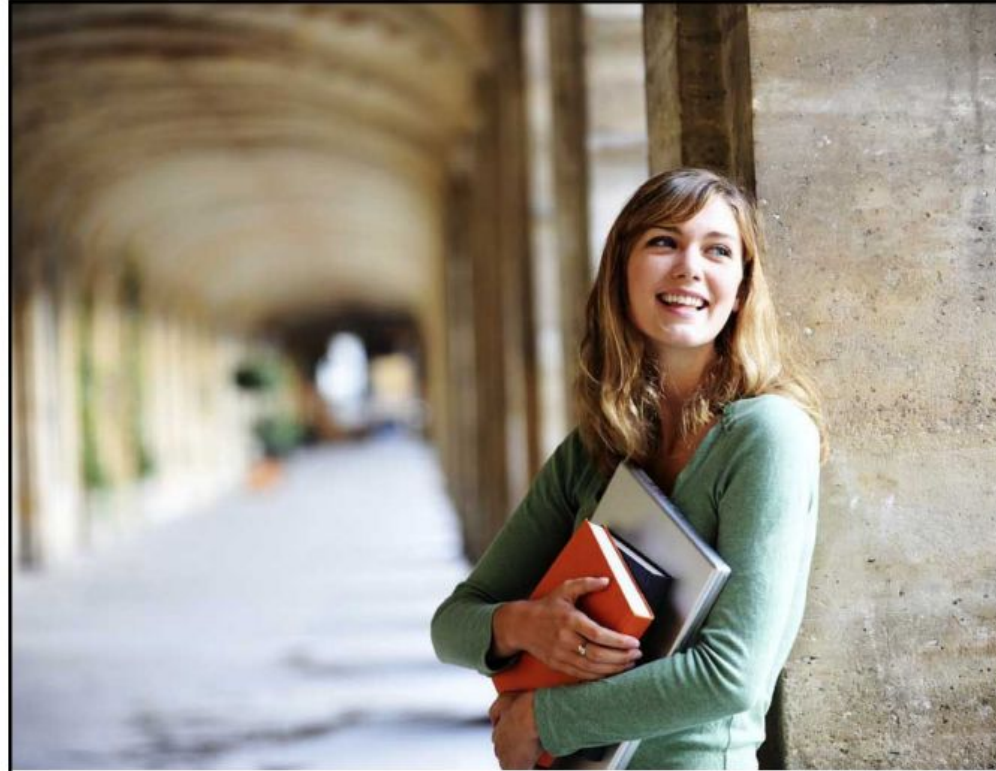
- Sexual Harassment Poster/Flyer **(Must be Posted in all buildings)**
- **Williams Act 23-24** **(Must be Posted in all buildings)**
- **UCP Policy 23-24** **(Must be Posted in all buildings)**

- Title IX Investigation Packet & letter : [Link](#)

[Title IX Google Drive Resources from Training](#)



REACT to Sexual
Misconduct



REACT to Sexual Misconduct

- Recognize
- Evaluate
- Act
- Corrective Measures
- Thoughtful Reflection/Tying Up Loose Ends



REACT
Recognize



REACT

Recognize

Step 1: Identify Potential Title IX Issues



Examples of “Red Flag” Conduct

- Flirtations or propositions
- Derogatory comments
- Sexual jokes or gestures
- Spreading sexual rumors
- Massaging, grabbing, or touching
- Comments on an employee or student’s body
- Sexual acts without consent or based on coercion
- Non-consensual “sexting”
- Sexploitation



Definitions – Sexual Harassment

Sexual Harassment is conduct on the basis of sex that satisfies one or more of the following:

1. An **employee** conditioning the provision of an aid, benefit, or service of the district on the complainant's participation in unwelcome sexual conduct;
2. 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 district's education program or activity; or
3. "**Sexual assault**" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "**dating violence**" as defined in 34 U.S.C. 12291(a)(10), "**domestic violence**" as defined in 34 U.S.C. 12291(a)(8), or "**stalking**" as defined in 34 U.S.C. 12291(a)(30).

Title IX Jurisdiction

Allegations of sexual harassment fall under Title IX when:

- The conduct occurs against a person in the United States;
- The conduct occurs in an education program or activity over which the district exercised substantial control over both:
 - 1) the respondent, and
 - 2) the context in which the sexual harassment occurs; and
- The complainant was participating/attempting to participate in the educational program or activity at the time the complaint was filed.



REACT
Evaluate



REACT

Evaluate

Step 2:
Assess the Nature
of the Complaint



Receiving Complaints (In General)

TYPES OF COMPLAINANTS

- Student
- Parent
- Employee
- Member of Public
- Anonymous Person

TYPES OF COMPLAINTS

- Verbal
- Written
- No Complaint (Rumor or Observation)

Involved Parties May Include...

- Student-on-student
- Employee-on-student
- Employee-on-employee
- Student-on-employee
- Same-sex parties



Receiving a Complaint

Formal v. Informal Complaints

- “Don’t tell anyone, but...”
- “Student X is a bully. He threw me into the lockers today because of my outfit.”
- “My teacher gave me an unfair grade because she hates me.”
- “We were playing tag and he slapped my butt.”

Receiving a Complaint



- Notify the Title IX Coordinator
- Assess whether a CPS report should be filed (continue to reassess)
- Title IX Coordinator should promptly schedule a meeting with the victim



Contact the Victim

- Conduct initial discussion with complainant/victim to better understand the complaint and if it rises to the level of sexual harassment under Title IX
- Discuss options for supportive measures
- Explain options for filing a formal complaint with the district
- Discuss the district's policy that prohibits retaliation

Evaluate the Allegations

Consider:

1. Severity of the allegations
2. Imminent harm
3. Criminal acts
4. Mandated reporting obligations
5. Involved parties (adult and student)
6. Complainant's request for actions

Does the Complaint/Allegation Trigger a Title IX Obligation?

1. Does the alleged conduct, if true, constitute sexual harassment under Title IX?
2. Is there jurisdiction over the conduct?

*If “no” to any of the above, any formal complaint must be dismissed.

1) If the Alleged Conduct is True, Does it Rise to the Level of Sexual Harassment Under Title IX?

1. Any **employee** conditioning the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct;
2. Any unwelcome conduct that a reasonable person would find so ***severe, pervasive, and objectively offensive*** that it denies a person equal education access; OR
3. Any instance of sexual assault, dating violence, domestic violence or stalking (as defined in the Clery Act or Violence Against Women Act)

2) Is there Title IX Jurisdiction Over the Conduct?

1. Education Program or Activity
 - a) Substantial control over the respondent; and
 - b) Substantial control over the context in which the sexual harassment occurred
2. Within the United States
3. At the time of filing a formal complaint, complainant must be participating/attempting to participate in the educational program

Do You Have a “Formal” Title IX Complaint?

- *Formal Complaint:* A document filed by a complainant (who is also the victim or the victim’s parent/guardian) or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the district investigate the allegation.
- If no formal complaint is filed by the complainant, the Title IX Coordinator should assess whether to independently initiate a complaint based on a threat to safety.

What if the Complainant says “Do Nothing”?

- The Title IX Coordinator must inform them of their options
 - Example: supportive measures without filing a formal complaint
- The Title IX Coordinator may sign a formal complaint on the victim's behalf
 - Assess the conduct!
 - If NOT filing a formal complaint would be deliberately indifferent, the Title IX Coordinator has the discretion to sign a formal complaint on the complainant's behalf



Evaluate How to Proceed (Possible Options)

1. Dismissal
2. Informal resolution
3. Formal Complaint/Investigation
4. Supportive Measures
5. Other actions needed immediately




REACT
Act



REACT

Act

Step 3:
Implement
Supportive/Urgent
Measures



Supportive Measures

“Non-disciplinary, non-punitive individualized services offered [...] to the complainant or respondent before and after the filing of a formal complaint or where no formal complaint has been filed.”

- Designed to restore or preserve equal access to the educational program without unreasonably burdening either party
- Should be determined on a case-by-case basis
- Cannot be retaliatory

Supportive Measures

Examples:

- Counseling
- Medical services
- Academic support (e.g., extension of deadlines or other course adjustments)
- No-contact orders
- Increased security
- Changed schedules (e.g., modification of work or class schedule)
- Leaves of absences (employees)
- Emergency removals in compliance with Title IX

Document the implemented supportive measures, but don't stop there!

Emergency Removals (Students)

School districts are prohibited from disciplining a student for alleged sexual harassment until a full Title IX investigation has been completed.

EXCEPTION: An Emergency Removal

- Respondent must be an immediate threat to the physical health or safety of any student or individual;
- The immediate threat must arise from the allegations of sexual harassment; and
- Respondent is provided with notice and an opportunity to challenge the decision immediately after removal.

Administrative Leave (Employees)

There are no restrictions under Title IX for placing an employee accused of sexual harassment on administrative leave.





REACT

Act

Step 4:
Determine Whether Complaint or
Allegations Trigger Title IX Obligations



Mandatory Dismissals

Districts *MUST* dismiss a Title IX complaint, or any allegations therein if:

- The alleged conduct, if true, does not constitute sexual harassment under Title IX; or
- The conduct did not occur in the district's education program or activity; or
- The conduct did not occur against a person in the United States; or
- The complainant was not participating/attempting to participate in the educational program at the time the complaint was filed.

Discretionary Dismissals

Districts *MAY* dismiss a formal complaint, or any allegations therein if:

- A complainant notifies the Title IX Coordinator in writing that they would like to withdraw the formal complaint or any allegations therein;
- The respondent is no longer enrolled or employed by the district; or
- Specific circumstances prevent the district from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

Dismissals (Mandatory and Discretionary)

- The decision to dismiss a *formal* complaint should be made in consultation with the Title IX Coordinator.
- Notice of dismissal must be issued to both parties in writing.
- Parties must be informed of their right to appeal the dismissal on the basis of:
 1. Procedural irregularity;
 2. New evidence that was not reasonably available earlier; or
 3. Involved personnel had a conflict of interest or bias.

Even if You Determine Title IX Is NOT Triggered or the Complaint Should Be Dismissed, Do NOT Stop There!

- *Consider whether the alleged conduct may otherwise violate district policy or employee/student conduct standards*






REACT

Act

Step 5:
Initiate an Investigation into the
Formal Complaint or Engage in the
Informal Resolution Process



Investigation Timelines



- Title IX - “reasonably prompt time frame”
- District policies

Send Written Notice of Investigation

Send “notice” letters to both the complainant and the respondent



Notice of Investigation

1. Identify investigation process, including informal resolution process
2. Identify allegations with sufficient details
3. Include a statement that respondent is presumed not responsible and that a determination is made at the conclusion of the process
4. Explain that they may have an advisor of their choice inspect and review the evidence
5. Identify the district's code of conduct that prohibits knowingly making false statements or submitting false information
6. Do not restrict either party's ability to discuss the allegations under investigation

Informal Resolution


- Informal resolution is a process that does not involve a full investigation and adjudication.
- It can only be offered when:
 - A formal complaint is filed;
 - The school district has sent a written notice about the allegations and the informal resolution process;
 - A written determination has not yet been made; and
- Both parties have provided voluntary, written consent to the process.
- Either party can withdraw from the informal resolution process at any time, and should be notified of this right.
- Informal resolution cannot be used for allegations where an employee is alleged to have sexually harassed a student.



REACT

Act

Step 6: Gather, Review, and Preserve Evidence



Legal Framework

Preponderance of the
Evidence
-or-
Clear and Convincing



Title IX Evidence Requirements

- District has the burden of gathering evidence.
- District cannot access or use a party's medical, psychological or other similar records unless they obtain the party's voluntary, written consent.
- District cannot restrict parties from discussing allegations or gathering and presenting relevant evidence.
- District must provide an opportunity for parties to present fact and expert witnesses and other exculpatory or inculpatory evidence.



Reviewing and Preserving Evidence

Documentation & Evidence

- Emails
- Phone records
- Attendance records
- Travel logs
- Security records
- Computer records/files
- Complaint
- Internet usage and websites visited
- Voicemail messages
- Pictures
- Audio/Video
- Credit Card Receipts
- Observing Locations
- Collective Bargaining Agreement

Weighing and Challenging Evidence



- Authentication
- Relevance
- Credibility



- RELEVANCE – Applying to the matter in question; affording something to the purpose (Black’s Law Dictionary)
- NOT permitted:
 - Sexual history of Complainant (see Rape Shield exception)
 - Privileged communications
 - Medical documentation
- Not repetitive



- In Title IX investigations, the decision-maker has ultimate responsibility for credibility determinations and may explore credibility issues with parties after your investigation report is complete
- However, in the course of an investigation, investigators are gathering important information that may impact credibility determinations, including:
 - Corroboration
 - Feasibility
 - Motivation for truthfulness/untruthfulness
 - Consistency
 - Reviewed/coached testimony

Impact of Trauma



- Many Title IX causes of action involve trauma
- Investigators and decision-makers must understand the impact of trauma on:
 - Reaction to trauma
 - Ability to capture memories
 - Recollection of memories
- Expectations around trauma victim



REACT

Act

Step 7: Conduct Witness Interviews



Witness Interviews

- Start with an outline of questions, but be flexible!
- Use the outline as more of a roadmap for issues you need to touch on with each witness.
- If there are a series of incidents, consider a linear roadmap.
- Keep in mind big picture goals.
- At the end, ask: Is there anything else?
- *If possible, have a 2nd administrator in the room*

Trauma-Informed Approach

- Do NOT Victim-Blame
- Choose a Comfortable Setting That is Not Triggering
- Build Rapport
- Ask Difficult Questions With Care - Explain Why You're Asking the Question
- Allow the Witness to Freely Speak and Then Ask Follow Up Questions

Interview Questions

- “Did you tell anyone about what happened to you?”
- “Tell me how that made you feel.”
- “Did you ever feel like this before?”
- “What was your thought process at that time?”
- “I’m asking you this to try to understand...”

Credibility Determinations

1. Demeanor;
2. Inherent plausibility;
3. Motive to lie;
4. Corroboration, or lack thereof;
5. Past record of conduct;
6. Opportunity and capacity to observe/actual knowledge;
7. Consistent or inconsistent statements;
8. Reputation for veracity or deceit; and
9. Bias.



Confidentiality & Preserving the Integrity of the Investigation

- Confidentiality cannot be promised.
- All evidence will be shared with the complainant/victim and the respondent.
 - Both parties will have an equal opportunity to inspect and review any evidence that is directly related to the allegations.

Lybarger/Spielbauer Warning/Rights



- Fifth Amendment Protection Against Self-Incrimination
- Lybarger/Spielbauer Warning – Public employees may be compelled to answer potentially incriminating questions about their job performance as long as they are not required to waive the constitutional protections.



Fifth Amendment Rights for Students

- School cannot use student's silence during an investigation against them in a disciplinary proceeding as an admission of guilt.
- However, you may inform the student of the impact of withholding their side of the story.



REACT

Act

Step 8: Review of Evidence by the Parties



Review of Evidence By the Parties

- Send the parties any evidence directly related to the allegations raised in the formal complaint
 - Includes evidence the district does not intend to rely on in reaching its decision regarding responsibility
 - Use of a draft investigation report or report of evidence
- Must be done prior to the completion of the investigation report
- Parties should be given at least 10 days to respond to the evidence, which must be considered by the investigator

*The investigator should work with the Title IX Coordinator to securely transmit the evidence to the parties, and to assess whether redactions may be appropriate.





REACT

Act

Step 9: Prepare the Investigation Report



Investigation Report

- The final investigation report should be prepared by the investigator and must summarize relevant evidence.
- Parties must be offered the opportunity to provide a written response to the investigation report.
- Must be sent to the parties at least 10 days before a written determination regarding responsibility is issued by the decision-maker.

Investigation Report (Recommended Content)


- Identify the date the investigation commenced
- Identify the investigator
- Identify interim measures offered to and accepted by the parties
- Summary of the investigation process
- Identify the legal standard of review applied to the review of evidence/applicable policies
- Identify number of/identity of witnesses
- Summary of evidence – documents and witness statements



REACT

Act

Step 10:
Decision-Maker Makes a Determination of
Responsibility for Sexual Harassment



Submission of Written Questions

- The decision-maker must allow parties the opportunity to submit written, relevant questions that they want to ask any other party or witness
- Once the parties are provided with the answers, they are permitted to submit additional, limited follow-up questions from each part
- Decision-maker determines relevancy, or explains why questions were deemed irrelevant
- Complainant's sexual history is irrelevant unless offered to prove someone else committed the conduct or for proof of consent

Written Determination Regarding Responsibility – Issued by the Decision-Maker

- **Identification of the allegations** potentially constituting sexual harassment
- **A description of the procedural steps** taken from formal complaint through the determination of responsibility
- **Findings of Fact** supporting the determination
- **Conclusions** regarding the application of the district's code of conduct to the facts

Written Determination Regarding Responsibility – Issued by the Decision Maker (Cont.)

- **Rationale** for each finding and conclusion, including a **determination of responsibility** for each allegation
- Statement of **potential disciplinary sanctions**
- **Appeal rights**



REACT

Act

Step 11: Appeal Rights



Appeal Rights for Both Parties at the District

Parties may appeal the written determination on the following bases:

1. Procedural irregularity
2. New evidence that was not reasonably available earlier
3. Title IX personnel had a conflict of interest or bias

*Students/employees may also be afforded the right to file a complaint or an appeal with federal and/or state agencies (e.g., OCR, CDE, DFEH, EEOC).



REACT
Corrective
Measures





REACT

*Corrective
Measures*

Step 12: Corrective Actions



Corrective Actions

- Staff/student discipline
- Ensuring no retaliation
- Additional support for involved parties
- Generalized training for staff/students in class, school, or district-wide
- Generalized notification of policies/ rules
- Increased monitoring and check-ins
- Changes to district practice



REACT

Thoughtful Reflection and Tying Up Loose Ends



REACT

*Thoughtful
Reflection*

Recordkeeping Requirements



Recordkeeping – Records Must Be Maintained for 7 Years

Formal Title IX Complaints:

- Any investigation of sexual harassment, including determinations regarding responsibility, recordings or transcripts of involved hearings, disciplinary sanctions imposed on the respondent, and remedies provided to the complainant
- Any appeal and the result therefrom
- Any informal resolution and the result therefrom

Recordkeeping – Records Must Be Maintained for 7 Years

Actual Knowledge But No Formal Title IX Complaint:

- Documentation of all actions, including any supportive measures implemented to demonstrate the response was not deliberately indifferent. Particular detail should be included if supportive measures are not offered to a complainant

Training Materials:

- All training materials for Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process

Thoughtful Reflection

1. Reflect on REACT
 - Staff responses
 - Policies and procedures
 - Evidence of systemic issues
2. Education to prevent future harm
 - Staff trainings
 - Student trainings



Questions

<https://www2.ed.gov/about/offices/list/ocr/docs/ocrshpam.html>



Transgender Equity

Regulation 5145.3
Non-discrimination
Harassment Policy pg 3-5
March 6th 2023

Transgender and Gender-Nonconforming Students

The District prohibits acts of verbal, nonverbal, or physical aggression, intimidation, or hostility that are based on sex, gender identity, or gender expression, or that have the purpose or effect of producing a negative impact on the student's academic performance or of creating an intimidating, hostile, or offensive educational environment. Regardless of whether the acts are sexual in nature. (AR 5145.3) Examples of the types of conduct which are prohibited in the District and which may constitute gender-based harassment include, but are not limited to:

1. Refusing to address a student by a name and the pronouns consistent with their gender identity.
2. Disciplining or disparaging a student or excluding them from participating in activities for behavior or appearance that is consistent with their gender identity or that does not conform to stereotypical notions of masculinity or femininity, as applicable.
3. Blocking a student's entry to the bathroom that corresponds to their gender identity.
4. Taunting a student because they participate in an athletic activity more typically favored by a student of the other sex.
5. Revealing a student's transgender status to individuals who do not have a legitimate need for the information, without the student's consent.
6. Use of gender-specific slurs.
7. Physical assault of a student motivated by hostility toward the student because of the student's gender, gender identity, or gender expression.

QUESTIONS

Title IX Folder Resources

[Title IX Google Drive Resources from Training](#)

Email Dr. Leyva & CC: Dr. Soria when all mandated forms have been updated in all buildings.

by

Monday, August 7th, 2023