

Lees McRae College

Title IX Policies and Procedures Training

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EXPERIENCE.
RESULTS.



Introduction: Training Roadmap

- Title IX Fundamentals
- Lees McRae's Title IX Policies and Procedures
- Title IX Formal Grievance Process and Procedures
 - Evidence and witnesses
 - Conducting hearings
 - Serving impartially

Title IX Fundamentals: 20 U.S.C. § 1681

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.

(June 1972)

Title IX Fundamentals: Regulations and Enforcement

1997 and 2001 – Sexual Harassment
Guidance from Department of Education.

2010 and 2014 – Updated “guidance” on
campus sexual misconduct.

2017 – All guidance prior to 2001 rescinded.

May 2020 – Final regulations published
related to sexual harassment in recipients’
education programs or activities, effective in
August 2020.

But how are these enforced?

Title IX Fundamentals: Who must be trained?

- Individuals with any role in carrying out the College's Title IX policies and procedures, including:
 - Advisors
 - Hearing board members
 - Appellate officers
 - Informal resolution facilitators
 - Title IX Investigators
 - Title IX Coordinators

Title IX Fundamentals: What training is required?

- Training topics must include:
 - Definition of sexual harassment;
 - The scope of the College's education program or activity;
 - How to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, **as applicable**; and
 - How to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

Title IX Fundamentals: What are the College's responsibilities?

- When does an institution violate Title IX with respect to a complaint of sexual harassment?
 - When the institution had actual knowledge;
 - Of actionable sexual harassment; and
 - Its response demonstrated deliberate indifference

Title IX Fundamentals: Sexual Harassment

- Includes three types of misconduct on the basis of sex:
 - *Quid pro quo* harassment by a school's employee
 - Any unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal educational access
 - Any instance of sexual assault (as defined by the Clery Act), dating violence, domestic violence, or stalking (as defined by the Violence Against Women Act)

Title IX Fundamentals: Actual Knowledge

- Who?
 - Title IX Coordinator
 - “Any official with the authority to institute corrective measures on behalf of the recipient”
- What?
 - Receives notification of Title IX sexual harassment OR
 - Allegations of Title IX sexual harassment
- *What if harassment is reported to me?*

Title IX Fundamentals: Scope of program or activity

Locations, events or circumstances...
...over which the school exercised **substantial control** over both the respondent and the context in which the sexual harassment occurred.



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Title IX Fundamentals: Scope of program or activity

- Locations
 - On-campus or any building owned or controlled by a student organization officially recognized by the school
 - If in a College program, applies whether on campus or off campus
 - Does not include conduct outside the U.S., even in a College-sponsored program

Title IX Fundamentals: Scope of program or activity

- Program or activity
 - All college programs
 - Complainant status limited to persons participating or attempting to participate in College's programs at the time a complaint is filed:
 - Includes students who are attending, on leave, or have graduated but have plans to return for another program or degree
 - Would not include a student who has left campus, including where decision to leave prompted by the complained-of conduct
 - Respondents may be anyone

Quiz 1: Title IX Fundamentals

- True or False: As soon as sexual harassment is reported to any employee of the College, the College has an immediate responsibility to begin Title IX procedures.

Quiz 2: Title IX Fundamentals

- Which of the following persons can make a complaint that will be handled through the College's Title IX procedures?
 - A - A student alleging that she was sexually assaulted by another College student while both were studying abroad in Italy.
 - B - A student alleging that she was punched by a classmate on campus after a political argument.
 - C - A prospective student alleging that she was sexually assaulted by another College student while she was visiting campus.
 - D - A former student who transferred from the College to another school after she was allegedly sexually assaulted by another College student.

Lees McRae Title IX Policy

- Available at:
<https://www.lmc.edu/students/title-IX.htm>
- Prohibited actions, definitions, and procedures.
- Formal Grievance Process in separate document.



Home > Students > Non-Discrimination And Title IX

Non-Discrimination and Title IX

Policy of Non-Discrimination

Lees-McRae College prohibits discrimination and harassment on the basis of race, sex, sexual orientation, gender identity, color, age, religion, national and ethnic origin, disability, genetic information, protected veteran status or other individual distinctions in its programs and activities (collectively, "protected status"). This prohibition includes discrimination or harassment based upon the perception of an individual's protected status, even if the perception is mistaken. Relatedly, this Policy prohibits related misconduct, such as sexual assault, relationship violence, and stalking. The College will take

- > Student Accounts
- > Textbook Information
- > Work Study
- > Campus Post Office
- > Non-Discrimination and Title IX
- > Campus Life Student Leaders

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Lees McRae Title IX Policies and Procedures

Policy of Non-Discrimination



Scope of Title IX Policy and Procedures



Affirmative commitment to non-discrimination;
Prohibited activities; and
Procedures used in College's response to reports of prohibited activities: Reporting misconduct, initial response, informal process, and formal grievance process.

Lees McRae Title IX Policy: Sexual Assault

Any sexual act directed against another person, without consent of the Complainant including instances where the Complainant is incapable of giving consent.

- No limitation by sex or gender
- List of included activities: rape, sodomy, sexual assault with an object, fondling, incest, and statutory rape.

Lees McRae Title IX Policy: Sexual Harassment

Unwelcome conduct that is so severe, persistent or pervasive, from the perspective of a reasonable person, that it denies a person's ability to participate in or benefit from the College's education program or activities.

- Can include unwelcome sexual advances, requests for sexual favors, and other verbal, or physical conduct of a sexual nature.
- "Title IX Sexual Harassment" also includes domestic violence, dating violence, and stalking.

Lees McRae Title IX Policy: Consent

The explicit approval and permission to engage in sexual activity demonstrated by clear actions, words, or writings, considered from the perspective of a reasonable person.

- Informed, freely given and mutually understood by all parties involved.
- May not be implied solely from silence, past consent to sexual activities, or consent to some form of sexual activity.
- **Consent can be withdrawn at any time, and once withdrawn, sexual activity must cease.**

Lees McRae Title IX Policy: Consent

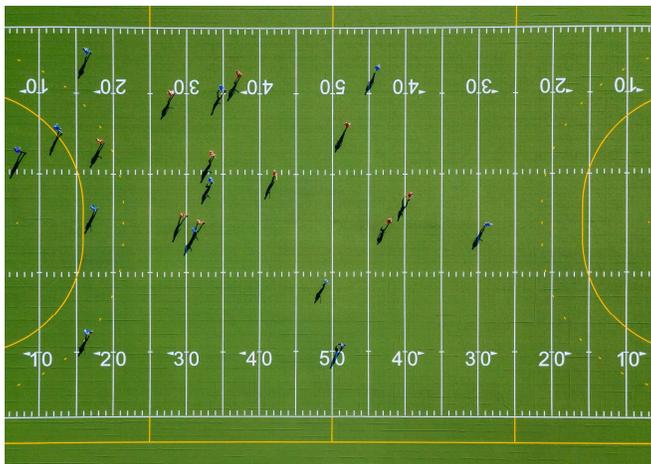
Consent is not possible where:

- Coercion, intimidation, threats, and/or physical force are used;
- Complainant was mentally or physically incapacitated or impaired so that the Complainant could not understand the fact, nature, or extent of the sexual situation;

Consent may not be possible where the Respondent has taken advantage of a position of influence over the Complainant.

Lees McRae Title IX Policy: Standard of Proof

- Preponderance of the evidence!



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Quiz 3: Lees McRae Title IX Policy

Which of the following meets the College's standard for finding that a violation of the Title IX Policy occurred? (multiple correct answers possible)

- A – I have serious doubts about both Complainant's and Respondents' stories, and I don't believe either of them.
- B – I believe the Complainant, but I don't think the investigator gathered enough evidence to show that her side of the story is true.
- C – I believe the Complainant and there is enough evidence to show that it is more likely than not that the Respondent violated the Title IX Policy.
- D – I believe the Complainant and there is enough evidence to clearly and convincingly show that the Respondent violated the Title IX Policy.

Quiz 4: Lees McRae Title IX Policy

True or False: Students who want to engage in sexual activity must each say out loud that they consent before they begin to avoid a violation of the College's Title IX Policy.

Initial Response Procedures

The College's response to learning of allegations of sexual harassment includes:

- Reporting – any staff or faculty who learns of discrimination allegations must, and students are encouraged to, report to the Title IX Coordinator
- Contacting the complainant *confidentially* – the Title IX Coordinator
- Supportive measures – the Title IX Coordinator in cooperation with other College administrators
- ...and explaining the process for filing a formal complaint.

Initial Response: Supportive Measures

Non-disciplinary, non-punitive individualized services, offered:

- Free of charge
- To complainant, respondent, or both
- Regardless of whether formal complaint filed
- For access to programs or activities, safety, and deterring prohibited conduct.

Must not unreasonably burden any party.

Initial Response: Supportive Measures

May include:

- measures to avoid contact between the Complainant and the Respondent;
- changes to academic and extracurricular activities including living, transportation, dining, and working situations; and
- access to resources such as victim advocacy, housing assistance, academic support, counseling, disability services, and health and mental health services, and assistance with reporting a crime to Campus Safety or the Town of Banner Elk Police Department.

Quiz 5: Lees McRae Title IX Policy

True or False: The Title IX Coordinator can put in place supportive measures for the Complainant that inconvenience the Respondent.

Formal Grievance Process: Procedural Roles

- Complainant
- Respondent
- Title IX Coordinator
- Title IX Investigator
- Advisors
- Hearing Committee, including a Chair
- Appeal Officer
- Informal Resolution Coordinator/Facilitator

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Formal Grievance Process: Advisor Requirement

- **The party's choice:**
 - May be, but need not be, an attorney
 - Allowed to bring advisor of choice to all meetings in the Title IX grievance process
 - May be anyone and may have a conflict of interest or bias
 - Given notice of right to choose advisor at beginning of formal process
- **Advisor provided by the College:**
 - Must provide an advisor for the hearing if student does not furnish one themselves or if student's advisor is no longer able to participate
 - Must be competent to participate, but not necessarily same level of competence as other party's advisor

Formal Grievance Process: Stages of Process

- Formal Complaint
- Notice to Complainant and Respondent
- Investigation
- Hearing
- Determination Regarding Responsibility
- Appeal (if applicable)

Filing a Formal Complaint

What is it?

A document filed by a Complainant or signed by the Title IX Coordinator alleging Title IX Sexual Harassment or Retaliation by a Respondent and requesting that the College investigate the alleged conduct.

How can it be filed?

In writing, and may be delivered in person, by email, or by U.S. Mail.

Reviewing a Formal Complaint

Must determine whether the alleged conduct:

- (i) was perpetrated against a person in the United States;
- (ii) took place within the College's education program and activities; and
- (iii) was reported by a Complainant who, at the time of filing or signing the Formal Complaint, was participating or attempting to participate in the College's education program and activities.

Dismissing a Formal Complaint

A formal complaint may be dismissed if:

- Review conditions are not satisfied (or are later determined not to be satisfied);
- Complainant requests in writing to withdraw the Formal Complaint;
- Respondent is no longer enrolled or employed at the College; or
- Specific circumstances prevent the Title IX Investigator from gathering evidence sufficient for the College to reach a determination regarding the Respondent's responsibility for the alleged Title IX Sexual Harassment.

Notice to the parties and right to appeal.

Notice to the Parties

- Before investigation begins, College provides written notice of:
 - Allegations of sexual harassment, including date, location, and identities of parties (if known), in sufficient detail to prepare a response
 - Grievance process and informal resolution process
 - Respondent presumed “not responsible”
 - Right to an advisor of their choice
 - Right to inspect and review evidence

Informal Resolution

- DETOUR from the “Formal Grievance Process”
- Both parties must give voluntary, written, informed consent
 - Not available for faculty-student complaints
 - May opt out at any time before a written agreement reached
 - Only way to impose disciplinary sanctions without a hearing



Investigation

Requirements:

- Thorough and impartial
- Relevant facts and evidence
- Sufficient to reach a determination
- Reasonably prompt timeframe
- Neutral approach with equal opportunity to both parties to participate or not
- Burden of gathering evidence and burden of proof remains on the College, but... **investigation not limited to the Title IX Investigator**

Investigation: Confidentiality

Medical records or other information or documents that are private or protected from disclosure by law

- May be requested
- Can only be obtained by agreement.

Complainant and Respondent's confidentiality obligations.

Investigation: Relevant Evidence

The following evidence or testimony is always considered not relevant (or is per se not relevant):

- Any party's medical, psychological, and similar treatment records without the party's voluntary, written consent.
- Any information protected by a legally recognized privilege without a voluntary waiver.
- Information or evidence regarding the Complainant's sexual predisposition.
- Information or evidence regarding the Complainant's prior sexual behavior, subject to the following exceptions:

Evidence of prior sexual behavior is relevant if offered to prove someone other than the respondent committed the alleged offense; or

Evidence of prior sexual behavior is relevant if it is specifically about the complainant and the respondent and is offered to prove consent.

Investigation: Required Disclosures

All evidence **directly related** to the allegations of the Complaint



Relevant evidence



Investigative Report...

...and parties' supplements to Investigative Report (if any)

Quiz 6: Investigations

Who has the burden to gather enough evidence to demonstrate that the Respondent is responsible or not responsible?

- A. Title IX Investigator, on behalf of the College
- B. Complainant and her advisor
- C. Respondent and his advisor

When is a determination reached through informal resolution final?

Quiz 7: Informal Resolution

When is a determination reached through informal resolution final (and cannot be changed)?

- A. After both parties have met with the facilitator and shook hands on an agreement
- B. After an agreement has been written down and signed by Complainant and Respondent
- C. Ten days after a written agreement has been signed by Complainant and Respondent

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Hearings: Overview

- Requirements
- Order of Hearing
- Materials and Participants
- Relevance and Standard of Proof
- Rules of Decorum and Courtesy

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Hearings: Requirements

- Live presentation of evidence and witnesses
- Simultaneous audio/visual transmission (recorded by College) and may be conducted by videoconference
- Cross-examination of witnesses
- Scheduled by Title IX Coordinator
- 3-person panel without conflicts of interest
- Required before any determination of responsibility

Hearings: Advance Materials

- Investigative Report, with relevant evidence attached
- Supplements from Complainant or Respondent
- List of witnesses

Quiz 8: Hearings

True or False: The Complainant and Respondent must be present in the same physical location for the hearing to take place.

Hearings: Order of Events

- Introduction - by Chair
- Opening Statements - by Complainant and Respondent
- Witness Testimony
 - Statement in Investigative Report
 - Questioning – Members of panel
 - Cross-Examination – ADVISORS ONLY
- Opportunity to address excluded evidence or testimony
- Final Statements – by Complainant and Respondent

Hearings: Introduction

- Introduction of parties and review of witnesses.
- Explanation of the order of hearing
- Planning and requesting breaks
- Rules of decorum and courtesy

Hearings: Opening Statements

- May be made by Complainant and Respondent only, and not their advisors
 - May confer with their advisors if they wish.
 - Optional – Complainant or Respondent may choose not to make a statement.
- Limit of 5 minutes
- Opportunity to “tell their side of the story” and identify important evidence or witnesses

Hearings: Witness Testimony

- Complainant and Respondent will likely be the most important witnesses
- List of available witnesses provided before hearing
 - Will have witness statements to review from Investigative Report
 - CANNOT consider any statement or testimony from a witness who does not attend the hearing and answer all relevant questions from parties on cross-examination
- Witnesses questioned first by members of Hearing Committee

Hearings: Questioning

- Members of the Hearing Committee go first
- Cross-examination by parties' advisors
 - Cross-examination questions may only be asked by advisors.
 - Obligation of College advisor: To ask questions that the Party wants to ask.
 - Clarifying questions may be asked after cross-examination questions.
 - A round of follow-up questions is allowed.
- Each cross-examination question will be approved by the Chair as relevant before it is answered. If not approved, Chair will explain why.

Hearings: Relevant Questions

- **Relevant:**
 - Tends to prove or disprove the allegations of the Formal Complaint or is closely related to the matters under discussion.
 - May include: prejudicial information, prior bad acts of Complainant or Respondent, or character evidence related to Complainant, Respondent, or another witness.
- **Relevant question: A question seeking relevant information or a reasonably related follow-up question.**

Hearings: Relevant Questions

- Questions are not relevant if they seek:
 - Information or evidence regarding the Complainant's sexual predisposition
 - Information or evidence regarding the Complainant's prior sexual behavior, subject to the following exceptions:
 - Offered to prove someone other than the respondent committed the alleged offense; or
 - Specifically about the complainant and the respondent and is offered to prove consent.

Hearings: Relevant Questions

- Questions may not be relevant if they:
 - Are repetitive of questions previously asked
 - Are excessively duplicative of other evidence
 - Do not clearly relate to the allegations of the Formal Complaint

Hearings: Relevant Questions

- Questions may not be relevant if they:
 - Are repetitive of questions previously asked
 - Are excessively duplicative of other evidence
 - Do not clearly relate to the allegations of the Formal Complaint

Quiz 9: Hearings

Which of the following cross-examination questions is definitely NOT relevant?

- A. Is it true that, a month before this incident, you had sex with the boy who lives across the hall from you?
- B. Is it true that, a month before this incident, you had consensual sex with the Respondent?
- C. Is it true that, a month before this incident, you lied to the Respondent about having sex with the boy who lives across the hall from you?

Hearings: Refusal to Answer Questions

- What happens if the Complainant refuses to answer a relevant question from the Respondent's advisor?
 - Cannot consider their testimony or statements, even if statements are provided by other witnesses (hearsay)

Hearings: Refusal to Answer Questions

- What happens if the Respondent refuses to answer a relevant question from the Complainant's advisor?
 - Cannot consider their testimony or statements, even if statements are provided by other witnesses (hearsay)...unless the statement itself is the violation (e.g., sexual harassment)
 - Cannot infer that Respondent is responsible for a violation of Title IX policy based on refusal to answer questions

Hearings: Refusal to Answer Questions

- What happens if a witness refuses to answer a relevant question from the Complainant's or Respondent's advisor?
 - Cannot consider their testimony or statements, even if statements are provided by other witnesses (hearsay)...
 - Cannot infer that Respondent is responsible for a violation of Title IX policy based on a witness's refusal to answer questions

Quiz 10: Hearings

Who may ask questions during a hearing? (multiple answers)

- A. Members of the Hearing Committee
- B. Witnesses
- C. Complainant
- D. Respondent
- E. Advisors
- F. The Title IX Investigator

Hearings: Final Chance to Argue Relevance

- Before final statements, the Complainant and Respondent may address:
 - Any evidence that they were prevented from presenting at the hearing (if submitted too late for supplement to investigative reports)
 - Any cross-examination questions the Chair did not approve

Hearings: Final Statements

- May be made by Complainant and Respondent only, and not their advisors
 - May confer with their advisors if they wish.
 - Optional – Complainant or Respondent may choose not to make a statement.
- Limit of 10 minutes

Hearings: Rules of Decorum

Highlights:

- **Respect and courtesy in words, tone and actions.**
- “While an advisor may be an attorney, no duty of zealous advocacy should be inferred or enforced within this forum.”
- No raised voices or physical threatening of any participant.
- Advisors may only approach others during the hearing if they ask permission first.
- No profanity, personal attacks, or accusations in questioning.
- Chair may stop repetitive questions or evidence.
- Do not misname or misgender any participant.

How are these rules enforced?

Determination Regarding Responsibility

- After the hearing (within 5 days), the Hearing Committee will confer and decide:
 - Whether the Respondent is responsible for violating the College's Title IX Policy as alleged by Complainant, by a preponderance of the evidence
 - If responsible, what sanction should be assigned to Respondent (and remedies to Complainant, if applicable)
 - How to allocate writing the Determination of Responsibility (within 10 business days)

Determination Regarding Responsibility

- **Written determination of responsibility must include:**
 - Identification of allegations potentially constituting violations of College's Title IX Policy (from Formal Complaint and Notice to Parties);
 - Procedural steps taken from receipt of the Formal Complaint through the end of the hearing, including notices, interviews, methods used to gather evidence, and hearings held (from Investigative Report);
 - **Facts** supporting the determination;
 - **Conclusions** regarding why the facts show that the College's Title IX Policy;
 - Statement of and rationale for the result as to each allegation;
 - Description of sanctions (and whether remedies will be provided to Complainant); and
 - Information about the appeal process (from Title IX Grievance Procedures).

Sanctions

If the Respondent is found responsible, the Hearing Committee will assign a sanction proportionate to the severity of the violation, including:

- Disciplinary probation or suspension
- Educational sanctions (for students)
- Written reprimand (faculty or employees)
- Warnings, fines, counseling, community service, mental health or medical assessment, loss of housing privileges
- No-contact order or removal of access to campus
- Dismissal (employees and faculty)
- Removal of privileges (faculty)

Basically, *any* sanction that is listed in the applicable Handbook (student, faculty, employee) and is appropriate

Remedies

If the Respondent is found responsible, the Hearing Committee may assign remedies to the Complainant as appropriate, which may include:

- Supportive measures
- Restitution
- Extension of supportive measures
- Measures burdensome or punitive to Respondent (such as removal from programs or activities)

Quiz 11: Sanctions and Remedies

How are remedies different from supportive measures?

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Appeals

Either Complainant or Respondent may appeal in writing within 10 days of Determination, on basis that:

- There was a procedural irregularity that affected the outcome of the matter,
- There is newly discovered evidence that could affect the outcome of the matter;
- Title IX personnel or a Member of the Hearing Committee had a conflict of interest or bias that affected the outcome of the matter; or
- The sanctions imposed are substantially disproportionate to the severity of the violation.

Non-appealing Party may respond in writing within 10 days.
Written decision issued within 20 business days.

Conflicts of Interest and Bias

Conflict of Interest:

- The person is biased in favor of or against a particular Complainant or Respondent due to prior interactions between them or a previously existing relationship that would prevent the person from impartially serving in their role in the Title IX process.
- May be identified during scheduling or by Complainant or Respondent (after names of Hearing Committee provided).
- Does not apply to advisors.

Conflicts of Interest and Bias

Bias: *What is it?*

- Treating a party differently on the basis of the party's sex or stereotypes about how men or women behave with respect to sexual violence.
- Treating any individual differently on the basis of an individual's protected characteristic, including sex, race, ethnicity, sexual orientation, gender identity, disability or immigration status, financial ability, socioeconomic status, or other characteristic.
- Making any decision based on the characteristics of the parties or witnesses, rather than based on the facts, is **impermissible**

Conflicts of Interest and Bias

Bias: *What is not bias?*

- Outcomes of the grievance procedure.
- Complaint signed by Title IX Coordinator
- Professional / personal experiences or affiliations... not necessarily.

Conflicts of Interest and Bias

Bias: How is it determined?

- On a case-by-case basis, depending on the circumstances
- From perspective of a reasonable person

Conflicts of Interest and Bias

Serving impartially means:

- NOT pre-judging the facts before reviewing the evidence and hearing testimony
- NOT relying on sex stereotypes
- Avoiding conflicts of interest and bias

Title IX: Training

Hosted via Vector Solutions/SafeColleges

Required for all fulltime employees—28 minute virtual course with assessment (effective 3.26.19)

Title IX and Sexual Harassment

Title IX applies to a variety of topics and can be confusing to some. Although most employees don't need to be legal experts, everyone needs to know some basic information about Title IX. This introductory course is designed to provide postsecondary staff members with information about the importance and implications of Title IX and sexual harassment, including sexual assault. Topics covered include the definition of sexual harassment, Title IX's regulations and obligations, and the elements of effective policies.

Authors

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Marybeth Sydor is a consultant to a nationally recognized New York City law firm for higher education Title IX compliance and civil rights matters and an analyst of Title IX federal regulations for higher education institutional policies and procedures. She has been a Title IX advisor for more than six years, representing more than 200 students and faculty during investigations, hearings and appeals.
Full Course, Full Course



Michelle Issadore is the vice president (association management) for The NCHERM Group; the former senior associate executive director for the Association of Title IX Administrators (ATIXA); and the former executive director of the School and College Organization for Prevention Educators (SCOPE). She works with schools, colleges, and community organizations nationwide to assess and improve their strategic prevention efforts, as well as research and understand best practice initiatives. Issadore has a BA in psychology and women's studies from Brandeis University and a MEd in college student affairs from The Pennsylvania State University.

Title IX: Rights and Protections

Hosted via Vector Solutions/SafeColleges

Title IX requires colleges and universities to promptly investigate a formal complaint and take steps to protect students. This course provides students with information about the importance of Title IX and what an institution's obligations are when a formal complaint is filed. Topics include: definition of sexual harassment, Title IX regulations and obligations, and grievance procedures.

Author

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Marybeth Sydor is a consultant to a nationally recognized New York City law firm for higher education Title IX compliance and civil rights matters and an analyst of Title IX federal regulations for higher education institutional policies and procedures. She has been a Title IX advisor for more than six years, representing more than 200 students and faculty during investigations, hearings and appeals.



Megan C. Farrell is an advisor and consultant to educational institution clients with a focus on Title IX compliance. She is also the Title IX coordinator at Palo Alto Unified School District and Notre Dame of Maryland University. She has developed and delivered Title IX compliance training (in person and online) and has audited Title IX practices and policies at universities, colleges and K12 districts. She holds a Bachelors of Arts from Loyola University, a Juris Doctor from Delaware Law School, and a Masters of Business from University of Maryland. She also holds certificates in bias and inclusion from Cornell University; mediation from San Francisco Bar Association; restorative justice from the Center for Restorative Justice; and mentor coaching through the Coach Training Alliance, an International Coach Federation program. She can be reached at megan@titleixconsult.com.