



WHERE ARE WE NOW?



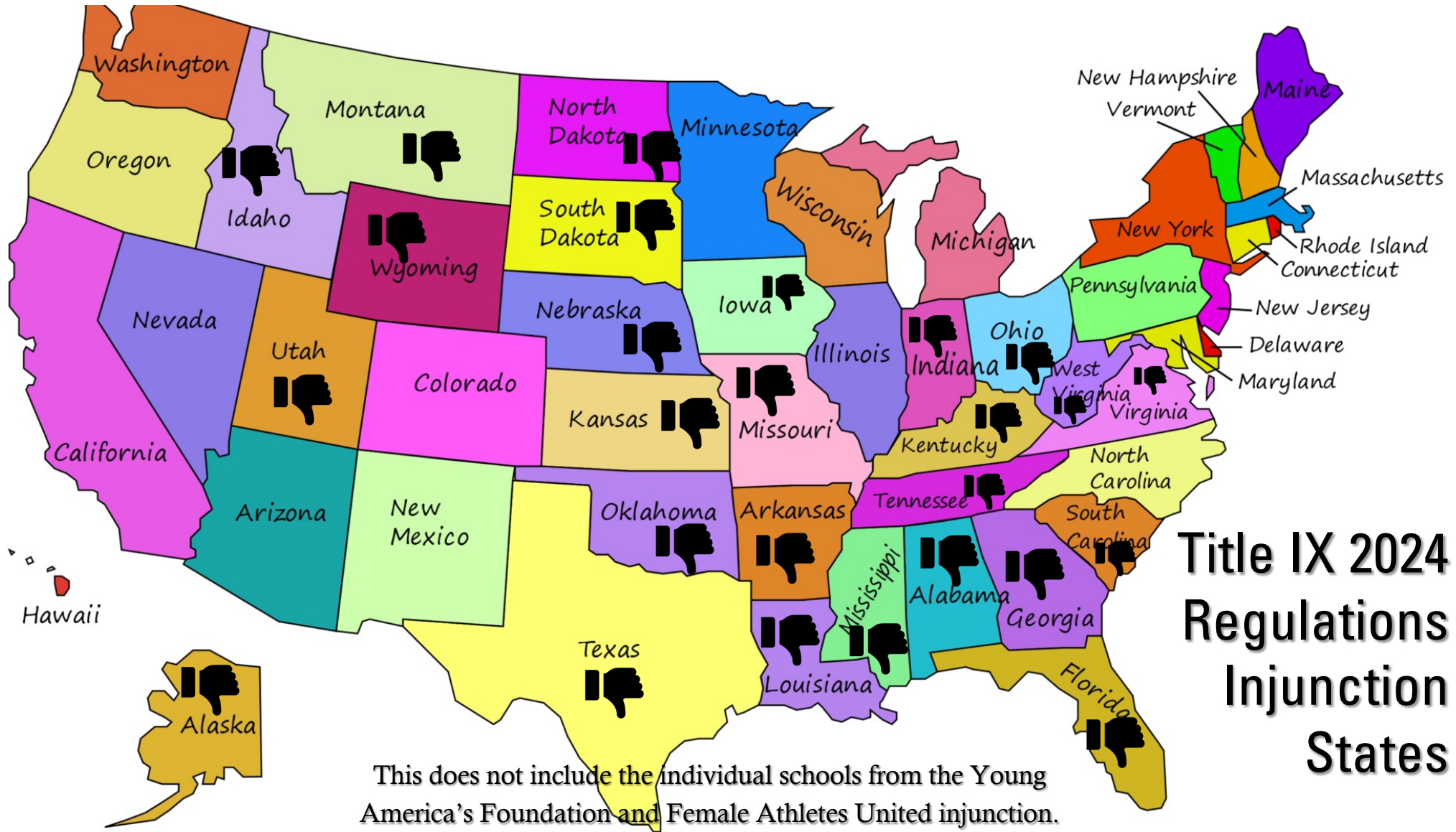
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Title IX 2024 Regulations Injunction States

PROGRESS CHECKLIST



COVERAGE



POLICY

- Implementation date - August 1, 2024
 - Is your policy written?
 - Is it published on your policy page?
 - Is it published on your webpage?
 - Have you checked your links?
 - Are your colleagues using the right policy?
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POLICY - INJUNCTION

- Do you have a statement on your webpage explaining the injunction?
- Is your new policy written and waiting?
- What will you need to do if the injunction is lifted?
- How fast can you implement it?

NOTICE OF NONDISCRIMINATION

- Where are your notices?
 - Website
 - Handbook, catalogs, applications, etc.
- Are you listed?
 - Name or position
 - Correct phone numbers and emails
- Is it clear as to how to make a report or complaint?

TRAINING - ALL EMPLOYEES

- Are you complying with the required training “promptly upon hiring or change of position that alters duties under Title IX and annually thereafter”?
- Have you implemented your all-employee training?
 - Obligation to address sex discrimination
 - Prohibited conduct
 - Duty to report or provide contact info
 - Duty to provide contact information to pregnant students

TRAINING - TITLE IX PERSONNEL

- Have you implemented your Title IX Personnel training?
 - Obligation to address sex discrimination
 - Prohibited conduct
 - Duty to report or provide contact info
 - Duty to provide contact information to pregnant students
 - Institution's responsibilities
 - Grievance procedures
 - How to serve impartially
 - The meaning and application of "relevant"
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RECORDKEEPING

- Have you updated your records retention policy?
- How are these maintained?
- How does someone request to inspect training materials because you no longer have to post?

STUDENTS WITH DISABILITIES?

- Do you have an agreement with your disability services coordinator on making requests?
- What is the process?
- Is this included in your policy or on your website?
- Have you done training with your Title IX personnel on responding to students with disabilities?

OFF-CAMPUS BEHAVIOR

- What analysis are you using to determine if alleged off-campus behavior, including study abroad, is contributing to a sex-based hostile environment?
- Have you shared this with your community?

ADMISSION, RECRUITMENT, & EMPLOYMENT



ADMISSION & RECRUITMENT

- Have you engaged with Admissions?
- Have you reviewed Admissions' policy and procedures?
- How are you ensuring there is no discrimination?

EMPLOYMENT

- Have you engaged with Human Resources, if you're not HR?
- Have you provided them with the appropriate language and documentation about nondiscrimination?
- Who is ensuring compliance?

EDUCATION PROGRAM & ACTIVITIES



PROGRAMS & ACTIVITIES

- Do you have a good understanding of the institution's program and activities?
 - Campuses
 - Internships
 - Student activities
 - Special academic events
-

DE MINIMIS HARM

- ❑ When different treatment or separation on the basis of sex is permitted under Title IX, an institution must not carry out such different treatment or separation in a manner that discriminates on the basis of sex by **subjecting a person to more than de minimis harm.**
 - ❑ What does this mean at your institution?
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FINANCIAL ASSISTANCE

- Do you have an understanding of the exceptions to the rule against single-sex scholarships?
- Who is checking the Athletic scholarships?
- Have you met with Financial Aid, Athletics, and your foundation?



STUDENT CONDUCT

- Who is ensuring that the conduct code does not subject students to different rules or that their application is based on sex?
- Do you or a designee monitor for discrimination in reporting, response, and sanctions?

FACILITIES

- Are you informed when housing is deciding on housing options, differential fees, etc.?
 - Who ensures Athletics has comparable facilities for its men's and women's teams?
-

ATHLETICS

- Who is responsible for the “laundry list” in Athletics?
 - Whether the selection of sports and levels of competition effectively accommodate the interests and abilities of members of both sexes
 - The provision of equipment and supplies
 - Scheduling of games and practice time
 - Travel and per diem allowance
 - Opportunity to receive coaching and academic tutoring
 - Assignment and compensation of coaches and tutors
 - Provision of locker rooms, practice and competitive facilities
 - Provision of medical and training facilities and services
 - Provision of housing and dining facilities and services
 - Publicity
 - What is your role when there is a possible issue?
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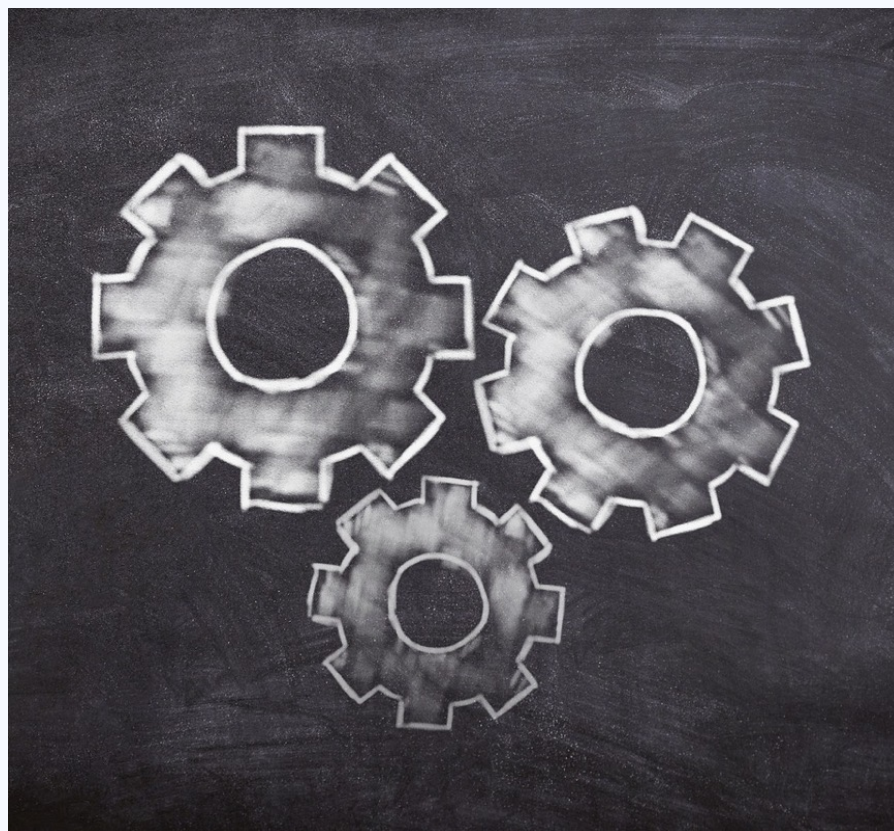
PREGNANCY, FAMILY, OR MARITAL STATUS



PREGNANCY, FAMILY, OR MARITAL STATUS

- How are you ensuring that no policy, practice, or procedure concerning a student's current, potential, or past parental, family, or marital status treats a student differently on the basis of sex?
 - Do you have resource materials?
 - Have you had discussions on lactation spaces?
 - What are your leave policies?
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GRIEVANCE PROCEDURES



REPORTING REQUIREMENTS

- Who needs to report?
- Have you defined who are confidential employees?
- Do you have a process to determine the prominent role when a person is a student and an employee?
- How does reporting work?
- Are there barriers to reporting?



INTAKE

- Do you have a script/checklist for intake meetings?
- Do you have a process for determining when you will proceed without a complainant?
- Have you reviewed your supportive measures?

EMERGENCY REMOVAL

- Have you updated your analysis?
- Who conducts the analysis?
- Who decides the removal?
- What about employees?

INFORMAL RESOLUTION

- When will you offer it?
- What are your options?
- Who is your informal resolution personnel?

INVESTIGATIONS

- Have you changed any part of the investigation process for either procedure (sex discrimination, sex-based harassment involving a student party)?
- Have you updated manuals and training?
- How are you managing evidence review?

DECISION-MAKING

- What option are you using?
- What is the role of the advisor?
- Are you still offering advisors?
- Have you revised your outcome letters?





THANK YOU

