



# **It's Really *Still* Not Just About Sports: Title IX Compliance 2023 – 24**

**Training for School Title IX Contacts**

**Mr. Marcus Allen, Assistant Superintendent of Support Services**

**Dr. Cecil Clark – Chief Human Resources Officer**

**Dr. Aronica Gloster, Director of Student Services/Title IX Coordinator**

**July 24, 2023 10AM – 12Noon**

**National Hills Literacy Center**



**Welcome!**  
**Please sign in.**

**Title IX Training for School  
Contacts - July 24, 2023 - 10AM -  
12PM**



**“This is a new year.  
A new beginning.  
And things will  
change.”**  
— Taylor Swift







## OUR VISION AND MISSION

# VISION STATEMENT

The Richmond County School System will provide an equitable education for all students to prepare them for life beyond the classroom.

# MISSION STATEMENT

Building a globally competitive school system that educates the whole child through teaching, learning, collaboration, and innovation.

# Strategy Map: 2020-2025









## Learning Targets

Participants will learn about:

- General history of Title IX legislation
- Definition of sexual harassment
- Scope of school jurisdiction
- Investigation/ Grievance Process
- Avoiding Bias



## Success Criteria



# Success Criteria

Participants will be able to

- Understand the general history of Title IX
- Describe updates to federal Title IX requirements
- Implement Title IX procedures for addressing reports and formal complaints
- Utilize school-wide efforts to prevent Title IX-related cases in RCSS schools





# Title IX Overview and Updates





# Title IX of the Education Amendments Act, 1972

20 U.S.C. § 1681 & 34 C.F.R. Part 106 (1972)



Title IX protects people from discrimination based on sex in education programs or activities that receive Federal financial assistance. Title IX specifically states that:

***"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 educational program or activity receiving Federal financial assistance."***



# Timeline - Title IX of the Education Amendments Act, 1972

## 20 U.S.C. § 1681 & 34 C.F.R. Part 106 (1972)

**1972:**

Title IX signed into law

**1975:**

Regulations first issued by Department of Health, Education and Welfare to address sex discrimination in athletics. Did not address sexual harassment as a form of discrimination.

**1997 – 2017:**

Department of Education addressed the topic through series of guidance documents (“Dear Colleague Letters”)

Important Supreme Court Cases that impact handling of sexual harassment.

**2018:**

The Department published proposed regulations to address the topic.

**2020:**

The new regulations are the first time the Department has addressed sexual harassment as a form of sex discrimination via regulations.

**2022:**

Notice of Proposed Rule-Making (NPRM)

**October 2023:**

Release of new regulations

# NPRM Top 10 Things To Know

- 1 Scope Expanded
- 2 Mandated Training Expanded
- 3 Additional/Modified Definitions
- 4 Complexity of Title IX Coordinator Role
- 5 Sexual Harassment is now Sex Based Harassment
- 6 Less Prescriptive Grievance Process
- 7 Informal Resolution-Initiated w/o "Formal Complaint"
- 8 Retaliation Protections
- 9 Discrimination Based on Pregnancy
- 10 Expands Recordkeeping



# Typical Title IX – Related Concerns



## Discrimination

Program Equity  
Recruitment, Admissions and Access  
Pregnancy  
Athletics  
Employment, Recruitment & Hiring  
Extra-curricular activities  
Access to Course Offerings  
Salaries and Benefits  
Financial Assistance  
Facilities  
Funding  
Sex, Gender, Gender Identity

## Sexual Harassment

Stalking  
Domestic Violence  
Dating Violence  
Sexual Assault  
Sexual Violence  
Sexual Exploitation  
Sexual Intimidation  
Sexual Misconduct  
Bullying and Cyberbullying  
Retaliation

# RCBOE Related Policies

Policy	General Information	Related Legislation	District Actions
<b>GAAA - Nondiscrimination Policy Equal Opportunity Employment</b>	<ul style="list-style-type: none"><li>• No Discrimination on the basis of sex (including gender identity) age, race, disability religion or national origin</li><li>• Applies to education programs and activities</li><li>• Applies to admissions to facilities operated by the Board</li><li>• Applies to employment practices</li></ul>	<ul style="list-style-type: none"><li>• Title IX</li><li>• Title VI and VII of the Civil Rights Acts of 1964 and 1999</li><li>• Section 504</li><li>• Age Discrimination in Employment Act</li><li>• Equal Pay Act</li><li>• Americans with Disability Act.</li></ul>	<ul style="list-style-type: none"><li>• Superintendent will<ul style="list-style-type: none"><li>• Coordinate efforts to comply</li><li>• Keep records</li><li>• Investigate complaints</li><li>• Administer a grievance procedure for employees &amp; students</li></ul></li><li>• Provide for publication of policy to all students, parents, employees, employment agencies and professional associations</li></ul>





Policy	General Information	District Actions
<b>GAEB – Sexual Harassment of Employees</b>	<ul style="list-style-type: none"><li>• Prohibits harassment of students or employees by students or employees based on race, color, sex, national origin, religion, age, or disability (protected classes)</li><li>• Harassment can include – conduct or speech entailing unwelcome sexual advances, requests for sexual favors, taunts, threats, vulgar comments, physical contact that creates hostile environment – and others acts</li><li>• Report to principal or appropriate coordinator designated by policy</li><li>• No retaliation for reporting</li><li>• If it is abuse, it should be reported to proper authorities (DFACS)</li></ul>	<ul style="list-style-type: none"><li>• <b>ALL</b> employees must promptly report</li><li>• Supervisors must tell of this policy</li><li>• Principals must put in handbooks and verbally that harassment is forbidden</li><li>• Violations will be investigated</li><li>• Appropriate discipline actions as well as rehabilitative actions taken and outlined</li><li>• Possible Discipline<ol style="list-style-type: none"><li>1. Conference;</li><li>2. Letter of Direction;</li><li>3. Reassignment;</li><li>4. Letter of Reprimand;</li><li>5. Suspension; or</li><li>6. Termination.</li><li>7. Report to Professional</li></ol></li><li>• Due process will be afforded to all effected employees.</li></ul>

# Board Policy GAEB: Sexual Harassment of Employees

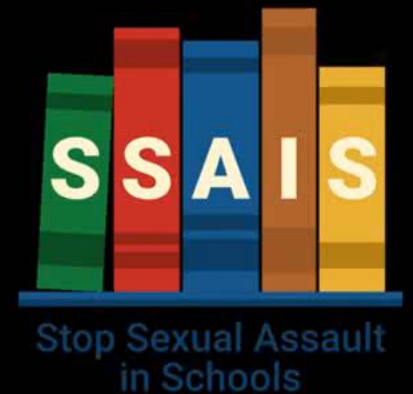
## – Supportive Measures & Consequences



1. Student counseling;
2. Family counseling;
3. Specialized training;
4. Referral to outside agencies;
5. Detention;
6. In-School and Out-of-School Suspension, including Long-Term Suspension;
7. Class or School Transfer;
8. Revocation of Out of Zone School Assignments or Exceptions;
9. Expulsion.



Sexual Harassment is Happening  
at ***My*** School?!

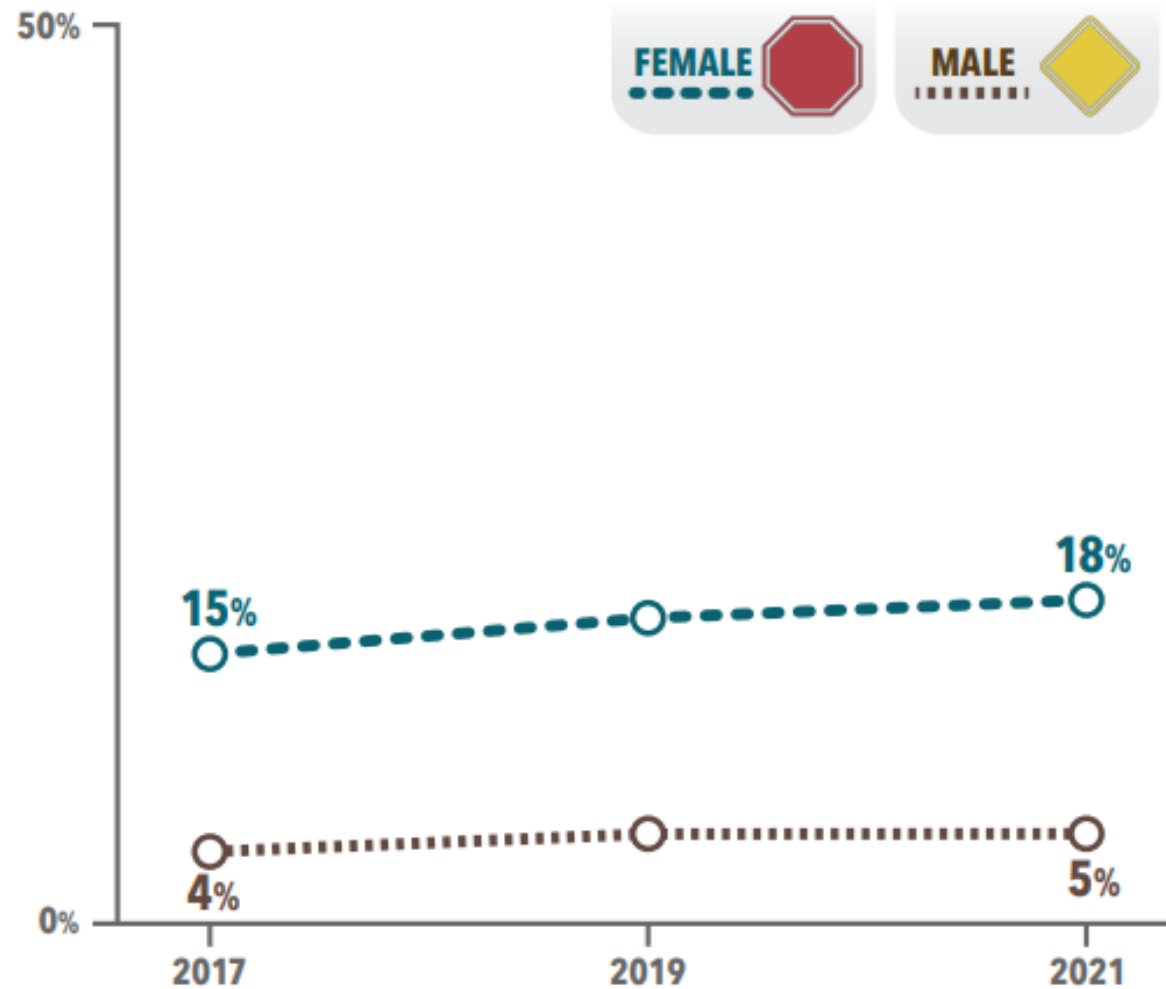


## Trends in the Percentage of High School Students Who

## Experienced **Sexual Violence by Anyone** during the Past Year, United States, YRBS, 2017-2021

### 4-Year Trend Description by Sex

The percentage of female students who experienced sexual violence by anyone increased from 2017 to 2021. The percentage of male students who experienced sexual violence by anyone did not change.



**Source:**  
CDC, Youth  
Risk  
Behavior  
Survey -  
2023



# Effects on Individuals

A word cloud of various psychological and behavioral effects on individuals. The words are arranged in a non-uniform, overlapping manner. The colors of the words include blue, green, and dark green. The sizes of the words vary, with 'PTSD' and 'DEPRESSION' being the largest. The words are: Stress, Anger, Poor performance in school, Distraction, Mistrust, Fear, Lost Opportunities, ANXIETY, Drop-out, Acting out, Absenteeism, PTSD, Suicide, and DEPRESSION.

Stress

Anger

Poor performance in school

Distraction

**Mistrust**

Fear

Lost Opportunities

ANXIETY

Drop-out

Acting out

Absenteeism

**PTSD**

Suicide

DEPRESSION

# Effects on Teams

Decreased focus

Lost productivity

Withdrawal

*Neglect*

Malingering

Absenteeism

**Turnover**

*Lack of trust in leadership*





# Why Title IX is Important

## Potential Impact of Sexual Misconduct



### Individual Impact

- Shame
- Humiliation
- Stress
- Anxiety
- Depression
- Loss of sleep
- Impaired learning/poor work performance
- Absenteeism/turnover

### School/System Impact

- Culture of discrimination
- Civil liability (monetary damages, attorney fees)
- Negative media attention and public outcry
- OCR Resolution Agreement
- Loss of federal funds

# Office for Civil Rights (OCR) and Title IX



- Office for Civil Rights (OCR) The U.S. Department of Education's Office for Civil Rights (OCR) enforces, among other statutes, Title IX.
- New Department regulations became effective on August 14, 2020. These changes required us to amend the RCSS procedures for responding to complaints of sexual harassment and sexual violence.
- Evidence of “**deliberate indifference**” is what can get schools and systems into serious trouble.





- OCR standard indicates that upon receipt of notice, **school/district must take immediate and appropriate steps** to investigate what occurred and take prompt and effective action to **end** the harassment, **remedy** the effects, and **prevent** the recurrence.
- OCR administratively enforces Title IX by:
  - Conducting investigations from complaints filed with the U.S. Dept. of Education.
  - Engaging in voluntary compliance investigations.

# Title IX of the Education Amendments Act, 1972

## 2020 Legislation



### Important Notes

- Goal of 2020 Legislation: Predictable, Consistent and Reliable means of securing non-discrimination
- Robust protections for all of those involved in Title IX cases
- Creates framework for how schools must respond to complaints
  - Grievance process – fair and transparent
  - School can't be discriminatory in responses (must apply to all regardless of sex)
  - Maintenance of records for 7 years
- Transparency of Training: Title IX training materials must be available for the public to review.



# School Requirements – Title IX



- **Annual Training/Awareness**

- Employees
- Students
- Parents (*make information available*)

- **Poster**

- Display in visible places
- Updated with school-specific TIX Coordinator information

- **Handbook Statement**

- Include statement on non-discrimination and Title IX

- **Personnel**

- Designated School Title IX Contact
- Will maintain all files related to Title IX cases

- **Website**

- [RCSS Title IX Website](#)
- School sites – link to RCSS Site

- **Reporting Requirements:**

Report to the System's Title IX Coordinator, as well as any additional designated individuals (school site administrators and school Title IX Coordinator), any known claims of potential sexual harassment.



# Roles



- **System Title IX Coordinator:**

- ☐ ensures fidelity and compliance
- ☐ facilitates investigation process
- ☐ arrange for appeals process
- ☐ ensures training
- ☐ Maintain records

- **School Title IX Contact (School-level):**

- ☐ Ensures training of employees and students on Title IX
- ☐ Receives reports and complaints
- ☐ First point of contact
- ☐ Implements supportive measures and decisions
- ☐ Keeps records pertaining to Title IX complaints

- **Title IX Investigator (System-level):**

- ☐ Investigates alleged misconduct
- ☐ Can be the Title IX Contact/Coordinator

- **Decision-Maker & Appellate Decision-Maker (System-level):**

- ☐ Makes a decision based on the Title IX Investigator's investigative report
- ☐ Cannot be the Title IX Contact/ Coordinator or Title IX Investigator

- **Informal Resolution Facilitator:**

- ☐ Must be trained
- ☐ Facilitates process between complainant and respondent
- ☐ Can be School Title IX Coordinator
- ☐ Cannot be Investigator or Decision-Maker



# School Title IX Contact – Role & School Contact Responsibilities



## Training

- Ensure training of school employees
- Ensure notifications are visible to students, parents and employees

## Supportive Measures

- Facilitate the provision of Safety/Supportive Measures for both the complainant and the respondent.

## Formal Complaints

- Process formal complaints and send them to the Investigator

## Manage

- Manage the case file including all forms, letters, evidence provided, and other documents.

## Secure

- Ensure that the case file is maintained in secured storage in administration for a period of seven years

## Collaborate & Communicate

- Collaborate and communicate with other essential personnel in the duties of this role.

# RCSS Title IX Personnel

**Dr. Kenneth Bradshaw,  
Superintendent**

**Title IX System Coordinator**  
Dr. Aronica Gloster, Student Services

**Complaints Against Employees**  
Dr. Cecil Clark,  
Chief HR Officer

**Complaints Against Students**  
Dr. Aronica Gloster,  
Student Services

**Athletics Complaints**  
Mr. Scott McClintock, Athletics

**System Investigators**  
Mrs. Kourtney Bell  
Mr. Gregg Riddle  
Officer Henry Jackson

**Decision-Maker**  
Mr. Horace Dunson,  
Deputy Superintendent

**Appellate Decision-Maker**  
Dr. Kenneth Bradshaw,  
Superintendent



# RCSS Title IX Terms



- **Complainant** – means an individual who is alleged to be the victim of conduct that could constitute sexual harassment, or on whose behalf the Title IX Coordinator has filed a formal complaint.
- **Respondent** – means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment
- **Advisor** -- a friend, a family member, an attorney, a neighbor, or other individual of the party's choosing who may support complainant or respondent. Can review documents, attend meetings but not actively participate in interviews.
- **Actual Knowledge (notice)** -- means notice of sexual harassment or allegations of sexual harassment to a recipient's Title IX Coordinator or any k-12 school employee
- **Deliberate Indifference** – response is unreasonable given what is known

# Important Information and Training Deadlines



- ☐ **July 24, 2023** – Training for School-level Title IX Contacts
  
- ☐ **August 31, 2023** - Deadline for presenting face-to-face Title IX training for all local school staff about reporting responsibilities (*Employees hired after the start of the year must be trained, also*)
  - ☐ *Verification must be submitted to District Coordinator by **September 8***
  
- ☐ **Mid-August** - Update on RCSS Title IX and Discipline Process
  
- ☐ **September 19, 2023** - Informal Resolution Training for Title IX Contacts



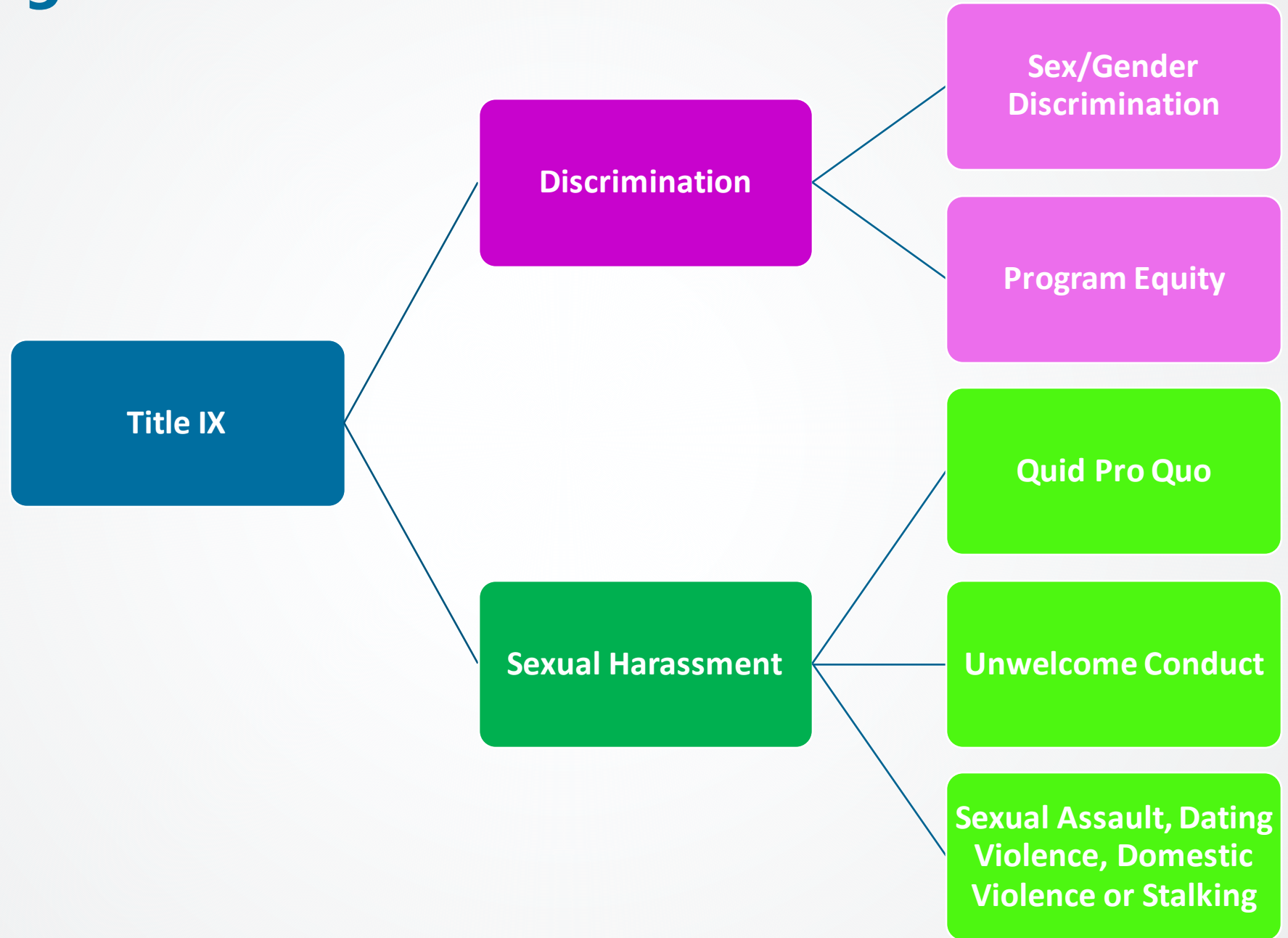


## Defining and Identifying Sexual Harassment





# Title IX Categories





# Sexual Harassment

Sexual harassment means conduct on the basis of sex that satisfies one or more of the following:

*All of these types of sexual harassment jeopardize the equal access to education that Title IX is designed to protect*

## Quid Pro Quo

An employee of the School System conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;

## Unwelcome Conduct

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 System's education programs or activities

## The Big 4 (Clery Act)

- **“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).

# Quid Pro Quo

- “Quid pro quo” means “something for something”
- Applies only employee to student
- Sexual demands are made the condition of educational benefits or access to educational opportunities regarding the individual
- Not evaluated for severity, offensiveness, pervasiveness, or denial of equal educational access – existence is enough





# Severe, Pervasive, AND Objectively Offensive



**UNWELCOME  
CONDUCT**



**SEVERE, PERVASIVE, AND  
OBJECTIVELY OFFENSIVE**

- Severe- can be non verbal through sexual assault (touching/fondling)
- Pervasive- how often and how widespread
- Objectively Offensive- behavior that would be offensive to a reasonable person under the circumstances



**DENIES  
EQUAL ACCESS**

# Unwelcome Conduct – Circumstances to Consider

## **Totality of the circumstances to consider:**

- frequency (persistence or pervasiveness); how often & how widespread,
- nature
- severity of the conduct.
  - Whether the conduct was physically threatening.
  - Whether the conduct was humiliating.
  - The relationship between the alleged harasser and the subject or subjects of the harassment.
  - The age of the alleged harasser and the subject or subjects of the harassment.
  - The size of the school, location of the incident(s), and context in which conduct occurred.
  - Curiosity or gratification?





# What is “Severe?”

- Something more than just juvenile behavior among students
- Something more than behavior that is even antagonistic, non-consensual, and crass
- Simple acts of teasing and name calling are not enough, even when based on sex

# What is “Pervasive”?

- Systemic, widespread
- Multiple incidents—usually one incident is likely not enough
- Spreading of information through social media in a one-time incident could qualify



# What is “Objectively Offensive”?

- Consider surrounding circumstances, expectations and relationships
- Is the act offensive based on the perspective of a reasonable person in the Complainant’s position?

# Unwelcome Conduct – Circumstances to Consider



## Sample indicators of a student experiencing unwelcome conduct :

- skipping class to avoid a harasser,
- a decline in a student's grade point average, or having difficulty concentrating in class
- a third grader who starts bed-wetting or crying at night due to sexual harassment,
- high school football player who quits the team but carries on with other school activities following sexual harassment.

## **A complainant does not need to have “already suffered loss of education before being able to report sexual harassment**

- *Complainants do not need to have “dropped out of school, failed a class, had a panic attack, or otherwise reached a ‘breaking point’”*
- School officials turning away a complainant by deciding the complainant was “not traumatized enough” would be impermissible = deliberate indifference!



# Sexual Assault/ Dating Violence – “The Big 4”

(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).

- Based on Clery Act and Violence Against Women Act – higher education
- Includes rape, sodomy, forcible fondling, stalking



## Sexual Assault

- An offense that meets the definition of rape, fondling, incest or statutory rape as used in the FBI's Crime Reporting system.
- A sex offense is any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent

## Dating Violence

- Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.
- The existence of such a relationship shall be based upon the reporting party's statement with consideration of several factors: (i) The length of the relationship, (ii) The type of relationship, (iii) The frequency of interaction between the persons involved in the relationship
- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.



## Types of Sexual Assault

### **RAPE:**

The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

### **FONDLING:**

The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

### **INCEST:**

Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

### **STATUTORY RAPE:**

Intercourse with a person under the age of consent(16) and not his or her spouse,

### **SODOMY:**

A person commits the offense of sodomy when he or she performs or submits to any sexual act involving the sex organs of one person and the mouth or anus of another.



## Domestic Violence

- A felony or misdemeanor crime of violence committed by:
  - a current or former spouse or intimate partner of the victim by a person with whom the victim shares a child in common;
  - a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
  - a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
  - any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.



## Stalking

- Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (1) Fear for the person's safety or the safety of others; or (2) Suffer substantial emotional distress.
- means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.



# Title IX Jurisdiction – Where Did it Occur?



Schools must respond when sexual harassment occurs within the scope of a school's "education program or activity" **and** in the US.

- This should be a consideration in the initial interview with complainant and also if the formal complaint is filed.
- Includes locations, events, or circumstances over which the school exercises substantial control over both the respondent and the context in which the sexual harassment occurred, whether such programs or activities occur on-campus or off-campus.
- Examples:
  - At school
  - Extracurricular activities
  - Field trips
  - School bus
  - Distance education
  - School Gyms
- A formal complaint filed for an allegation outside of the Title IX jurisdiction must be dismissed
- • A school may address sexual harassment affecting its students or employees that falls **outside** Title IX's jurisdiction in any manner the school chooses, including providing supportive measures and/or pursuing discipline



# Warning Signs in Students

## Behavior indicators in students might include:

- Inappropriate sexual behavior or knowledge, particularly in younger children
- Late arrivals to class or excessive absences
- Changes in personality
- Increased time with one adult
- Referring to a teacher as a “friend”
- Difficulty paying attention
- Unexplained disciplinary or academic issues
- Depression or anxiety
- Self-injury (cutting, burning)
- Drug and alcohol abuse





# Warning Signs in Employees



## Behaviors of adults who engage in sexual misconduct might include:

- Spending more time with children than other adults
- Close personal relationships with students
- Singling students out for special attention or privileges
- Time alone with students
- Time in private spaces with students
- Flirtatious behavior with students
- Off-color remarks in class
- Being too permissive with students and allowing misbehavior
- Engaging in peer-like behavior with students
- Giving gifts to students
- Oversharing personal information with students
- Touching, tickling, hugging, kissing, wrestling and/or holding students
- Exchanging personal notes, texts, e-mails, or other communications with students

# School Responsibilities for Responding to Sexual Harassment



For K-12 schools, once any school/district employee has **actual knowledge** of sexual harassment/sexual misconduct, the school must:

- ☐ Take immediate and appropriate steps to investigate what occurred – The obligation to investigate is absolute, even if just an Initial Assessment is completed
- ☐ Take prompt and effective action to:
  - ☐ **Investigate** the allegation
  - ☐ **Stop** the harassment
  - ☐ **Prevent** the recurrence
  - ☐ **Remedy** the effects

***These responsibilities must be met regardless to whether the Complainant makes a formal complaint or asks the school to take action.***



# Check Your Understanding -- Poll





## Is this severe, pervasive and objectively offensive?

- A single unwelcome hug by another student
- A teacher making repeated sexually suggestive and harassing comments to her students
- A student being subject to repeated harassing comments and one incident of having another student expose their genitals close to her.
- One instance of being called a gay slur by another student.
- A student taking a picture of another's body parts and AirDropping it to the 9<sup>th</sup> grade class.





## Scenario 1

- Sherry informs you that Richard asked her if she wanted to see something and Sherry told him "sure". Sherry stated that Richard went to the bathroom and came back and showed her his phone. Sherry stated, "it was a picture of his Peter and I told him that is disgusting". Sherry then stated that Richard said to her "come to the bathroom and suck me off". Sherry says replied, "No! You're nasty!"
- You call Richard to the office and speak to him about the incident. He admits to the showing her a picture of his private area but he stated that it was because she wanted to see it. He also admits to asking Sherry to "suck him" but he stated, "I was talking about away from school."
- Does this meet the definition of Sexual Harassment?





## Scenario 2

- One of your 6<sup>th</sup> grade students states that Jeff licked his lips and blew a kiss at him when he went to the bathroom. He also reports that Jeff tried to get into a bathroom stall to see another student. He also reports that the Jeff stood at a bar at lunch and started to go up and down on it while looking at him. This is the first time this has occurred.
- Does this meet the definition of Sexual Harassment?
- Why/why not/need more info?





## Scenario 3

- **Sam is a Junior at ICS High School. Ms. Smith observes that Sam has been spending a lot of time with his math teacher, Ms. Brown, outside of classroom time. Ms. Smith often observes Sam in Ms. Brown's classroom before the start of school, during lunch period, and also after school. Ms. Smith has heard rumors that Sam and Ms. Brown are in a relationship. Ms. Smith reports the information to the Title IX Coordinator. The Title IX Coordinator talks to Sam who says Ms. Brown is a family friend and there is nothing inappropriate going on. The Title IX Coordinator talks to Sam's friend, Alex, who says Sam and Ms. Brown have kissed according to Sam**
- **Should the Title IX Coordinator file a Formal Complaint?**
- **Is this sexual harassment?**





## Scenario 4

- Campbell reports to the Title IX Coordinator that her boyfriend, Ben, is threatening to kill her through text messages if she breaks up with him. She says that he has been abusive to her before by slapping her and locking her in his car until she agreed to stay with him one time when they went to dinner at Olive Garden. Campbell does not want to file a Formal Complaint but wants you to change him out of the English class that they are in together. She wants Ben kicked out of school but does not want him to know that it was because of her allegations.
- Does this meet the definition of Sexual Harassment? Why or why not?
- Can you move Ben as a supportive measure?
- If Campbell does not want to file a Formal Complaint, but her mother files one on her behalf, investigate?





## Scenario 5

- Tyler works maintenance at the school. He alleges that Charlotte, a kindergarten teacher, keeps hitting on him. He files a Formal Complaint that states that Charlotte has asked him on a date three times. Each time Tyler has turned her down and said he is not interested. Charlotte also routinely makes comments to him about how he is hot and has a “nice butt. ”



## Scenario 6:

- Max is dual enrolled at ABC High School and DEF College. He files a Formal Complaint with your school district alleging that he was sexually assaulted by a DEF College student one after an event on campus. Title IX Coordinator does a follow up with Max, who states that the incident occurred at a house party off campus.

Does this meet the Title IX definition?





**BREAK  
TIME !!**





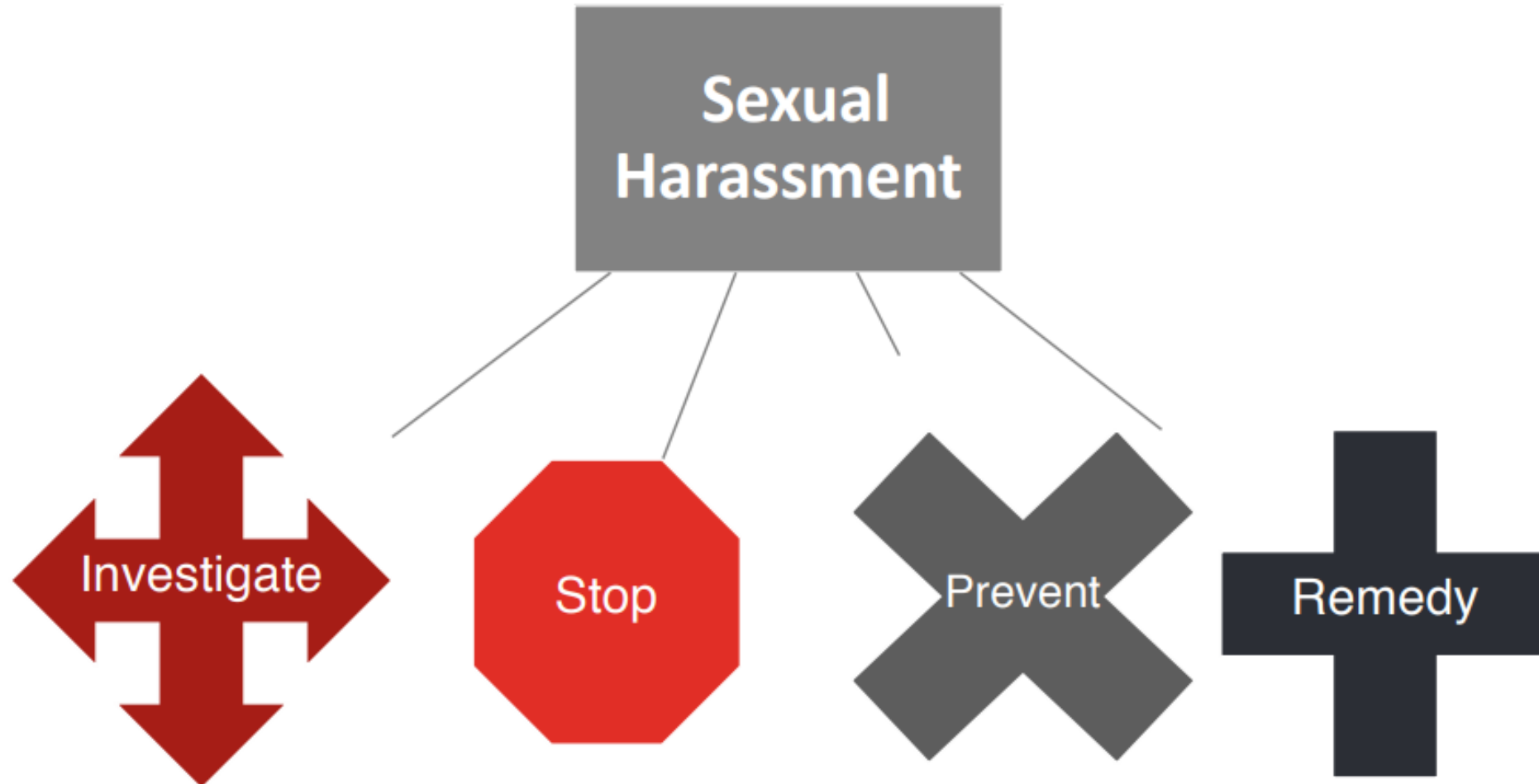


# School Response to Allegations & Grievance Procedures





# School Responsibilities for Responding to Sexual Harassment



# Actual Knowledge (Notice)



## What is Actual knowledge (notice)? When do you have it? Who can receive it?

- Actual notice occurs when an individual notifies the Title IX coordinator or other **responsible employee**. A responsible employee:
  - Has the authority to take action to redress the harassment; or
  - Has the duty to report harassment or other types of misconduct to appropriate officials; or is
  - Someone a student could reasonably believe has this authority or responsibility;
- Individual complains to school police or security official.
- Staff member witnesses harassment
- Rumors, gossip, social media, etc. *can* be notice
- **This means that ALL EMPLOYEES are responsible and must report any allegations of sexual harassment. Not doing so is being “deliberately indifferent.”**

## Once actual notice exists, the duty to investigate is absolute.

- ☐ Small “i” preliminary inquiry.
- ☐ Big “I” comprehensive investigation (Formal Complaint.)



# Actual Knowledge (Notice): “Reports”



- Distinguish between a “**report**” and a “**formal complaint**”
- **Report Sources:**
  - Student
  - Parent/guardian can make report/complaint for student
  - Employee
  - Member of the public
  - Anonymous person
- **Types of Report:**
  - Verbal
  - Written
  - Rumor or observation
- Students must be warned about the consequences of providing false information, but not in a manner designed to discourage honest reports.

# “Report” – vs- “Formal Complaint”



- **Formal Complaint**

- ☐ Requires completion of Formal Complaint Document or electronic submission (email, online form)
- ☐ Filed and signed by Complainant or signed by TIX Coordinator
- ☐ TIXC does not become a party to the complaint
- ☐ Alleges Sexual Harassment
- ☐ Requests an investigation
- ☐ Complainant must be participating or attempting to participate in the Recipient's (School System) education program or activity at the time of filing
- ☐ Initiates mandatory grievance process (investigation and hearing)

**Formal Complaint** can initiate lengthy process.

## **Supportive Measures**

Upon receiving a “report” (either from the would-be Complainant or a third party), School Title IX Coordinators must meet with the complainant and parents (if minor) to put **supportive measures** in place.

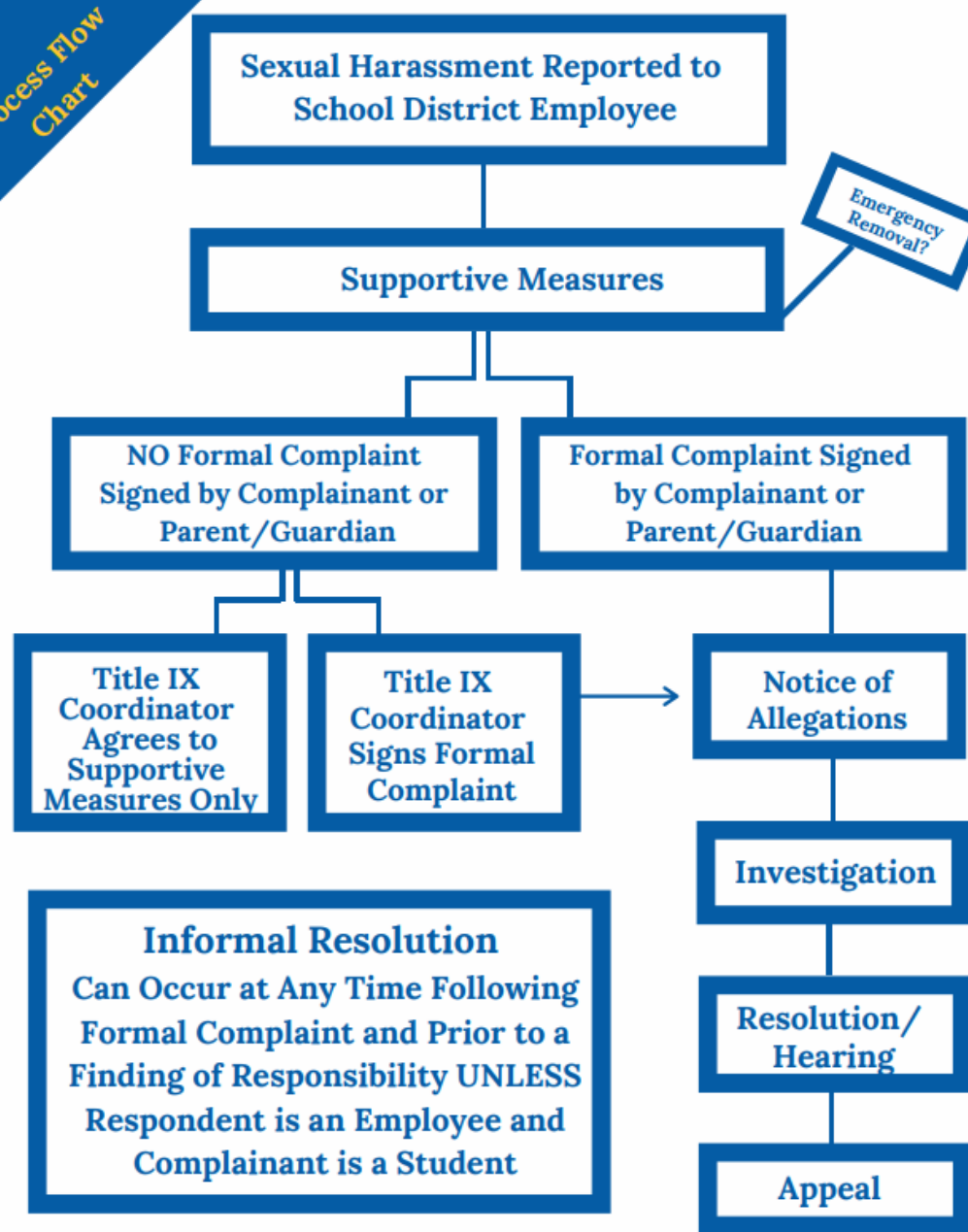
May also be provided to respondent *(if deemed necessary)*



# Actual Knowledge (Notice) Summary



- **Actual knowledge (notice)** triggers the obligation to offer supportive measures, explain grievance process
- **Formal complaint** triggers the obligation to investigate
- Parent/guardian has “right” to make report or complaint for students in K-12.





# Provide Supportive Measures

- Provided to all parties throughout the process (reports and/or formal complaint):
  - ☐ Provided promptly to complainant and also to respondent (as appropriate)
  - ☐ Non-disciplinary, non-punitive
  - ☐ Individualized
  - ☐ Restore or preserve equal access
  - ☐ Without unreasonably burdening other party
  - ☐ Protect safety of parties or environment, or deter sexual harassment
  - ☐ Document the supportive measures
  - ☐ Confidential (*as much as possible*)
- If supportive measures not provided, document why not (*template provided*)



***\*Schools don't have to provide consequences, but must provide supportive measures.***

# Common Supportive Measures



- Referral to counseling, medical and/or other health services
- Referral to the Employee Assistance Program
- Altering work arrangements for employees
- Moving lockers, parking spaces
- Allowing one to come early/late
- Safety planning
- Providing school safety escorts
- Transportation accommodations
- Change of pick-up location
- Implementing contact limitations (no contact orders) between the parties; mutual restrictions on contact between the parties
- Academic support, extensions of deadlines, or other modifications of work or class schedule
- Trespass or Be on the Lookout (BOLO) orders
- Increased security and monitoring of certain areas of school
- Other similar measures
- **TRACK MEASURES (*Ideally each semester*) – *when, what offered, accepted, when re-evaluated/updated***





## Title IX Intake Form

(To be used during initial conversation about allegation)

Purpose: to gather information; initial inquiry

1. Date: \_\_\_\_\_
2. Name of Complainant: \_\_\_\_\_
3. Name of Respondent: \_\_\_\_\_
4. Date of Incident: \_\_\_\_\_ Time of Incident: \_\_\_\_\_
5. Location: \_\_\_\_\_
6. Allegation of Sexual Harassment:

7. Is there an allegation of abuse? Report to DFACS within 24 hours
8. Offer **Supportive Measures**. List the measures provided below: (ex. Counseling, extension on assignments, class change, buddy, etc.) These measures should be agreeable to the Complainant. The Respondent cannot be punished, although emergency removal can be used if there is immediate threat of safety.

9. Discuss Title IX and non-discrimination.

*"No person in the United State shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance."*

3 Types: 1. Quid Pro Quo, 2. Unwelcoming Conduct, 3. Sexual assault, domestic violence, dating violence & stalking

RCSS policies GAEB Equal Opportunity Employment and GAA Sexual Harassment of Employees address discrimination and harassment.

10. If the allegation seems to meet the definition of sexual harassment, determine if this complaint meets Title IX jurisdiction by evaluating these questions:
  - a. Did the alleged incident occur within the scope of a school's "education program or activity?"
  - b. Did the alleged incident occur in the US?
  - c. Is the Respondent still in the school system?
  - d. If the answer to all questions is "yes," the alleged incident falls within RCSS jurisdiction.
11. If the allegation doesn't meet the Title IX sexual harassment definition or is not within RCSS jurisdiction, consider whether the issue should be pursued under another Code of Conduct statute or other rule. Refer to the appropriate party.
12. Contact the District Title IX Coordinator to discuss the allegation and determine next steps.

### After Consultation with District Title IX Coordinator

13. If the allegation seems to meet Title IX jurisdiction, explain to the Complainant the right to pursue a Formal Complaint.
  - a. Formal Complaint process includes:
    - i. Filing of a written formal complaint
    - ii. an investigation into the allegation
    - iii. including interviewing of witnesses
    - iv. determination of responsibility by a decision-maker
    - v. can take about 30 - 45 days to get to resolution
14. If the Complainant wants to file a Formal Complaint, also explain the option for Informal Resolution.
  - a. Informal Resolution is a process that
    - i. Requires filing a formal complaint
    - ii. Is usually shorter than the full investigation and adjudication process
    - iii. Must be agreed upon by both parties
    - iv. Provides an opportunity to informally resolve issues or concerns involving harassment
    - v. Does not cancel the ability of a person to resume the adjudication process, as long as it's decided prior to signing an agreement at the end of the Informal Resolution process
    - vi. Cannot be used when an employee is involved in the allegation
    - vii. There are different types – mediation, facilitated dialogue, etc.
  - b. Go through the Informal Resolution Packet. Have the Complainant initial and sign that they understand of the process.
15. Ask the Complainant if they want to pursue the formal investigation and adjudication process, informal resolution or neither. Indicate the person's choice on the Title IX Intake Verification Form and below.

16. Indicate the choice of the Complainant:

\_\_\_\_\_ No complaint (provide supportive measures and note that the individual doesn't want to proceed. Have them sign.)

\_\_\_\_\_ Formal Investigation and Adjudication

\_\_\_\_\_ Informal Resolution

17. Notify principal and System Title IX Coordinator of the outcome of the initial inquiry.

18. Next Steps:

Printed Name of Title IX Contact Completing this Form: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



**Title IX Intake Verification Form**

*(To be used during initial conversation about allegation)*

1. Date: \_\_\_\_\_

2. Name of Complainant: \_\_\_\_\_

3. Name of Respondent: \_\_\_\_\_

My signature below verifies that I have met with the School Title IX Coordinator and discussed the following:

\_\_\_\_\_ The allegation of sexual harassment

\_\_\_\_\_ Supportive measures

\_\_\_\_\_ Rights provided by Title IX

\_\_\_\_\_ Jurisdiction of Title IX

\_\_\_\_\_ Formal Complaint Process

\_\_\_\_\_ Informal Resolution option

\_\_\_\_\_  
Signature of Complainant or Respondent

**Formal Complaint Procedure Decision:**

My signature below verifies my decision regarding the Formal Complaint process (continue or discontinue.)

\_\_\_\_\_ I wish to continue the Title IX Formal Complaint Process.

\_\_\_\_\_ I wish to continue the Title IX Formal Complaint process, but through Informal Resolution.

\_\_\_\_\_ I do not wish to continue the Title IX Formal Complaint process. I understand that if my concern meets the definitions and jurisdiction of Title IX, no discipline can be applied unless a Formal Complaint is filed.

\_\_\_\_\_  
Signature of Complainant



# Formal Complaint & Investigation Steps



1. Receive Notice/Complaint

2. TIXC coordinator conducts initial assessment and jurisdiction determination. *(meet with complainant)*



3. Complainant decides whether or not to file formal complaint.  
TIXC decides whether to investigate based on initial assessment  
*a. TIXC also offers informal resolution option*

4. Notice of Investigation to Parties/Notice of Formal Allegation  
("Charge")

# FORMAL TITLE IX GRIEVANCE PROCESS FOR INVESTIGATORS





# Emergency Removal



The regulations provide that a respondent may be removed on an emergency basis (prior to adjudication) “provided that the [institution] undertakes **an individualized safety and risk analysis**, determines that an **immediate threat to the physical health or safety** of any student or other individual arising from the allegations of sexual harassment justifies removal, and **provides the respondent with notice and an opportunity to challenge the decision** immediately following removal.” (§ 106.44(c))

## Notes on Emergency Removal

- Applies to students
- Don’t call it a “suspension” = discipline
- Due to risk and safety concerns; immediate threat to health or safety (i.e. dating/domestic violence)
- Do it carefully, although may seem punitive
- Provide DUE process to allow opportunity to challenge removal
- Emergency removals are not going to be appropriate in all circumstances → fact specific inquiry
- Do not act based on generalized or hypothetical scenarios; judge on a case-by-case basis
- Employees – can be put on administrative leave(not ER)



# TITLE IX DISCRIMINATION COMPLAINT FORM

**PURPOSE:** Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681) prohibits discrimination based on the sex of students and employees of educational institutions which receive federal financial assistance. This form should only be used for complaints alleging discrimination prohibited by Title IX (including sexual harassment and sexual violence). When the form has been completed and signed by you, and then received and noted by the Richmond County School System, you will be provided with a copy of this form as well as complete information about the Title IX complaint process. If you require emergency assistance, please contact the appropriate school administrator.

**INSTRUCTIONS:** Individuals alleging Title IX discrimination and requesting review are requested to complete this form and submit it to the School Administrator (e.g., Principal, Assistant Principal) or Title IX Coordinator as soon as possible after the occurrence of the alleged discrimination. You do not need to answer every question to submit the form. Reports can be submitted anonymously, with the understanding that anonymity increases the difficulty of pursuing investigation. If you have any questions, please contact your school Title IX Coordinator, administrator, or System Title IX Coordinator, Dr. Aronica Gloster, at (706)826-1000 x 5501 or [gloster@boc-richmond.k12.ga.us](mailto:gloster@boc-richmond.k12.ga.us).

I am filing this complaint as a (check one): ☐ Student (or on behalf of a student) ☐ Employee ☐ Anonymously

Name of Complainant: \_\_\_\_\_ Name of Student: \_\_\_\_\_

School: \_\_\_\_\_ Grade: \_\_\_\_\_

Home Address: \_\_\_\_\_ City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email (Parent/Guardian if under 18): \_\_\_\_\_

1. Nature of Complaint: Please describe the action(s) you believe may be sex discrimination, including complaints of sexual harassment or sexual violence, in violation of Title IX and identify with reasonable particularity any person(s) you believe may be responsible. Please attach additional sheets, if necessary:


2. List the name of the person or persons you believe committed the offense against you and how you have contact with them (e.g., teacher, peer/student, supervisor, co-worker):

Name	How You Have Contact with Them

3. When did the above described actions occur? \_\_\_\_\_

SUBJECT TO BOARD MODIFICATION

4. Where did the above described actions occur? \_\_\_\_\_

5. Are there any witnesses to this matter? (Please circle) Yes No  
If yes, please identify the witnesses and how you have contact with them:

Name of Witness	How You Have Contact with Them

6. Have you spoken to or notified any administrator(s) or other staff member(s) about this matter? (Please circle) Yes No

If yes, please identify:

Person to Whom You Have Spoken	Date of Contact	Method of Contact (verbal, email, etc.)

7. Statement of Relief Sought by Complainant: What would you like to happen as a result of your complaint?


**Certification:** Please read the statement below, sign and date your complaint.

I certify that to the best of my knowledge, the foregoing information is true and correct.

Printed Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Submit completed form to a school administrator or the School Title IX Coordinator. Completed forms may also be submitted directly to the System Title IX Coordinator.

## Verification of Receipt of Complaint

(To be completed by administrator and/or Title IX Coordinators)

Date Received by Administrator: \_\_\_\_\_ Signature: \_\_\_\_\_ Title: \_\_\_\_\_  
 Date Received by School Title IX Coordinator: \_\_\_\_\_ Signature: \_\_\_\_\_  
 Date Received by System Title IX Coordinator: \_\_\_\_\_ Signature: \_\_\_\_\_  
 Date Received by Deputy Title IX Coordinator: \_\_\_\_\_ Signature: \_\_\_\_\_

SUBJECT TO BOARD MODIFICATION



# Formal Complaint



- Completed by complainant or the TIXC
- Copy submitted to the System TIXC
- Discuss the opportunity for Informal Resolution
- If Informal Resolution not agreed upon by both parties  
(Complainant and Respondent) – must pursue formal  
investigation

# Formal Complaint - Dismissal



- **MUST** dismiss when the conduct does not meet the jurisdictional requirements:
  1. If the allegations would not constitute sexual harassment even if proven (still must investigate; contact complainant and seek more information)
  2. If the sexual misconduct did not occur in institution's program/activity
  3. If the sexual misconduct did not occur against a person in the United States (respondent doesn't need to be in the United States)
- **MAY** dismiss:
  1. If complainant requests to withdraw their complaint
  2. If respondent is no longer enrolled or employed
  3. When specific circumstances prevent gathering evidence sufficient to reach a determination



# Formal Complaint - Dismissal

- If a complaint is dismissed:
  - Parties must receive simultaneous written notice of dismissal with reason(s) – *(template provided)*
  - Parties must have opportunity to appeal dismissal
  - Dismissal does not preclude other institutional action



# Grievance Process -- Informal Resolution



- Considered a worthy practice, when voluntary.
- A formal complaint must be filed
- Allowed at any time prior to a final determination at discretion of TIXC
- Voluntary, written consent of the parties and their parent/guardian
- Cannot be used when allegations are that an employee harassed a student
- Must still stop, prevent, remedy, and document response



# Grievance Process – Informal Resolution

- Examples of Informal Resolution

- Mediation
- Restorative Justice Practices
  - – Circles
  - – Conferences
  - – Hearings



- Can be done at the school level with the School Title IX Coordinator.
  - ***Coordinator must be trained***
- Training for Informal Resolution will be provided – September, 2023

# Grievance Process – Investigations

## Small “i” and Big “I”

- Once actual notice exists, the duty to investigate is absolute.
- Small “i” preliminary inquiry when talking with complainant during initial conversation
- **Comprehensive investigation (Big “I”) will be conducted by System Investigators**
  - Upon receipt of a formal, written, signed complaint.
  - Required if complainant doesn’t want to pursue Informal Resolution.

- **Components of Big “I” Comprehensive Investigation**

- Witness interviews (from both parties)
- Evidence gathering
- Advisors can support
- Not allowed to access physician, psychologist, etc. without consent
- Written notice of investigation requirements
  - date, time, location of interviews
  - with ample time
  - Must be provided to both complainant and respondent
- Investigation Report must be provided to both parties.
- Parties must be provided meaningful opportunity (10 days) to respond to preliminary investigation report. (10 days )
- Parties must receive final investigation report 10 days prior to decision-making.



*\*Note: During investigations, schools cannot implement “gag orders” to keep parties from discussing the matter.*



# Grievance Process - Decision-Making

- Investigator will notify Decision Maker (Mr. Dunson) of evidence/ provide investigative report
- Decision Maker will objectively evaluate and draw conclusions
  - Independent, free of bias, conflict of interest
  - Will be trained
- Burden of Proof
  - School has burden of proof to show met by a preponderance of the evidence
  - Greater than 50% chance claim is true



# Grievance Process - Decision-Making

- Written decision report will be provided in a report
  - Identifies the school policy violated
  - Provides a description of the procedural steps taken by the school on the way to getting to that point;
  - Includes a findings of fact section;
  - Includes a section that draws conclusions after applying the facts to the portion of the school's policy that applies;
  - Includes statement and rationale for the ultimate determination of responsibility;
  - Includes any disciplinary action the school will impose, and whether the school will provide remedies to the complainant;
  - Includes a statement and rationale for any remedies for the complainant, addressing how those remedies will restore or preserve equal access;
  - Includes a statement that the parties have right to appeal the initial determination regarding responsibility, permissible bases for appeal and procedures.



*\*School Title IX Coordinator is responsible for ensuring remedies in the decision are implemented.*



# Grievance Process –Decision & Appeal

- Appeal bases: (must impact the hearing)
  - procedural irregularity
  - new evidence
  - conflict of interest or bias
  - erroneous relevancy determinations
  - Must be equitable to both parties
- Can't appeal because of not liking the decision!
- Notice must be given to both parties when appeal filed
- Decision-maker for the appeal ≠ initial decision-maker on the formal complaint, the investigator, or the Title IX Coordinator
- Both parties must have a chance to submit a written statement and must both receive the issuing written decision



# Grievance Process – Retaliation



- To avoid retaliation concerns, regulations require institutions to keep the identity of parties and witnesses confidential (exceptions: FERPA, state law, or hearing concerns)
- Retaliation complaints may be made through grievance process
- May not retaliate because participation or refusal to participate in an investigation, proceeding, or hearing
- RCSS Code of Conduct and Board Policy prohibit retaliation



# Conflict of Interest & Bias

- Watch for **conflicts of interest** or **bias** throughout the process
  - A conflict of interest occurs when personal or private interests may compromise one's judgment, decisions, or actions
  - A bias is a tendency, inclination, or prejudice toward/against someone
    - Often based on stereotypes, rather than actual knowledge of an individual or a particular circumstance
    - Frequently based on a person's gender, race, or sexual orientation
  - Pre-judgement
  - Relationships/Friendships
- **Self-Reflect. Consult. Remove yourself from the process and reach out for assistance.**



[RCSS Title IX Complaint Process Flowchart](#)

[RCSS Complaint Procedure – Narrative](#)

[RCSS Title IX District Site](#)

[Title IX Shared Folder for Schools](#)





# Recordkeeping, Special Considerations, Prevention & Resources





# Recordkeeping & Forms

## Record keeping

- All Title IX records should be maintained locally for 7 years
  - ☐ All statements
  - ☐ Evidence
  - ☐ Communication
  - ☐ Logs
  - ☐ Decisions
  - ☐ Reports
  - ☐ Informal Resolution
  - ☐ Appeals
  - ☐ Everything related to an allegation
  - ☐ All Title IX training materials



- Copies of documents will also be maintained at Board Office.



# Title IX Forms



Located in OneDrive Folder: [Title IX Shared Folder for Schools](#)

## Alphabetical List of Forms

	Form	Purpose
1	Advisor/ Designee Form	Identification and permission for Advisor
2	Allegation Notice (Written Notice of Title IX Allegation)	Provided to Complainant and Respondent to notify of allegation of sexual harassment
3	Appeal Determination Letter	Explains outcome of appeal process
4	Appeal Process Acknowledgement	Acknowledges request for appeal of decision
5	Complaint Form	Initiate Formal Complaint Process
6	Consent to Informal Resolution	Used for Complainant and Respondent to indicate their agreement to participate in Informal Resolution
7	Cover Letter for Investigation Report	Accompanies Investigation Report; Cover sheet
8	Decision Appeal Form	Used to request an appeal of decision
9	Decision Form	Documents outcome of investigation process
10	Dismissal Form	To be used to explain why a complaint was dismissed
11	Dismissal of Complaint Notice	Notifies parties of a complaint dismissal
12	Documentation of District Response	Summary of School and District response to allegation
13	Informal Resolution Outcome Template	Used to document outcome of Informal Resolution
14	Intake Form	Used during initial conversation to gather basic information; Use when a report of sexual harassment is made
15	Intake Verification Form - Complainant/Respondent	Complainant/Respondent sign showing they have had an initial meeting with School Title IX Coordinator to discuss rights, allegation, supportive measures, informal resolution, etc.

# Title IX Forms



## Title IX Procedural Checklist



Date/Response/ Information	Action	Form
	Date Report/Complaint of allegations received.	
	Name/Title of person who received Report/Complaint.	
	Date Report/Complaint received by Title IX coordinator.	
	Does conduct, if proven, constitute sexual harassment? (see Policy GAEB)	Title IX Intake Forms
	Does conduct, if proven, lead to a reasonable belief that a child has been or may be abused or neglected? If so, contact DFACS and/or law enforcement within 24 hours of forming that belief.	Title IX Intake Forms
	Date of communication with Complainant to discuss supportive measures and advise about formal complaint procedure.	Title IX Intake Forms, Title IX Procedures; Advisor Designation
	Date and description of supportive measures for Complainant (if any).	Title IX Intake Form, Title IX Procedures; Advisor Designation
	Date of communication with Respondent to discuss supportive	Title IX Intake Form, Title



# Discipline Process & Title IX



- Discipline process and Title IX process may have to parallel one another
  - Process isn't "clean cut"
  - **Will need to consult with System Title IX Coordinator and Board Attorney's Office. Call System Title IX Coordinator if suspected sexual harassment.**
  - Considering Emergency Removal or Suspension? **Consult with System Title IX Coordinator and Board Attorney before taking action.**
- Complainants must be made aware of right to file Title IX Formal Complaint
  - If DAP is not Title IX Coordinator, DAP must notify Title IX Coordinator
  - Advise parents and students that Title IX Formal Complaint Process may take up to 60 days

# Discipline Process & Title IX



- In initial informal interviews, consider whether or not allegation meets definition and jurisdiction of Title IX sexual harassment.
- **If a Formal Complaint is filed:**
  - Be careful not to re-traumatize students
  - Statements collected during Title IX process can possibly be reviewed and updated in Tribunal process to prevent continual re-hashing of details
- A student could be found responsible through the Title IX Grievance Process and through the Tribunal process.



# Special Situations & Considerations



- A. **DFACS reports** – continue to make immediate reports; must be made within 24 hours
  - Intentional contact with another's private area
  - Intentional nudity/exposure of private area to another person
  - Alleged misconduct is unique to student's age and suggests abuse
  
- B. **Criminal Behavior** – must still be reported to school safety and law enforcement
  - Notify Principal,
  - Notify SRO
  - Notify DFACS, as appropriate
  - Meet with parents to ensure safety measures
  - Document findings
  - **Must conduct a parallel Title IX investigation – under consultation with Board Attorney**

# Special Situations & Considerations



C. Digital/ Online Students

D. Transgender Students – may have complaints under Title IX;

- compassion,
- Empathy
- due process

E. Confidentiality

F. Students with 504s or IEPs



# Students with 504 Plans or IEPs

## IEP/504

- How will you know?
- Flag in system?

## Possible Result

- If true, result in change in placement?
- Doesn't mean don't investigate

## Supportive Measures

- Change plan?
- Notification
- Re-evaluation of plan

## Emergency Removal

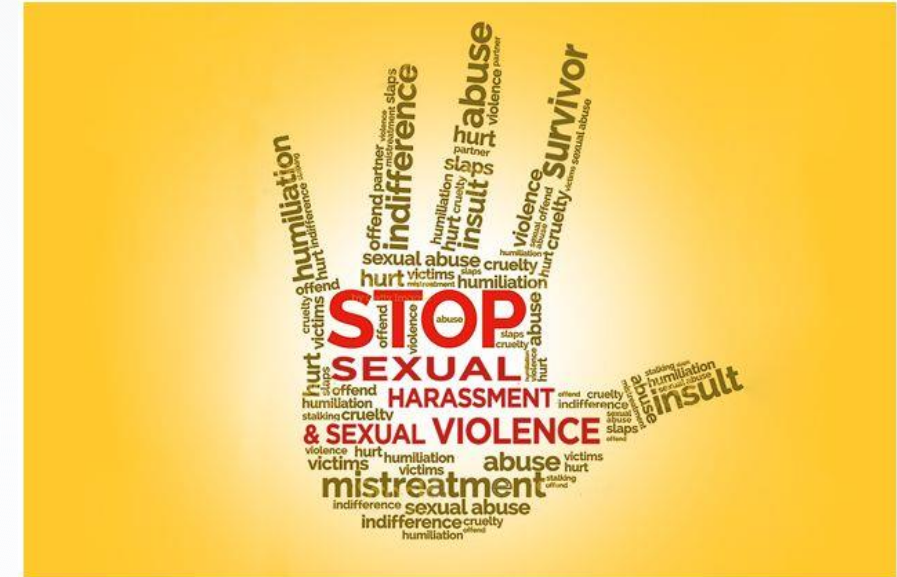
- Change plan?
- Notification
- Re-evaluation of plan

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- Prevention Efforts

- Positive School Climate
  - Teach SEL curriculum/ Implement TAA
  - Foster culture of support and acceptance
  - Supports positive relationships
  - Encourages respect
  - Prohibit bullying
- Sex Abuse Prevention and Awareness Training
- Annual meetings at the beginning of the year with employees
- GCN training (ethics)
- Posters
- Information to parents





# Next Steps



1. Review the RCSS policies and procedures for Sexual Harassment
2. Review this training
3. Link school's website to RCSS Title IX Website
4. Train school staff and students regarding Title IX – can be coupled with bullying procedures
5. Ensure staff has completed ethics training - GCN
6. Ensure posters are displayed in visible places
7. Designate a place for keeping Title IX Records
8. Contact System Title IX Coordinator regarding when made aware of any Title IX Allegations

# RCBOE Resources



RCBOE Title IX Website:

<https://www.rcboe.org/Page/62245>

**System Contact:**

Dr. Aronica Gloster

Director, Student Services & Title IX  
Coordinator

[glostar@boe.Richmond.k12.ga.us](mailto:glostar@boe.Richmond.k12.ga.us)

(706)826-1000 x 5501

Richmond County School System Non-Discrimination Policy  
[Non-Discrimination Policy](#)

Richmond County School System Bullying Policy  
[Bullying Policy](#)

Georgia Department of Education - Equity  
<https://www.gadoe.org/External-Affairs-and-Policy/Policy/Pages/Equity.aspx>

US Department of Education  
Office of Civil Rights - Title IX and Sex Discrimination  
[https://www2.ed.gov/about/offices/list/ocr/docs/tix\\_dis.html](https://www2.ed.gov/about/offices/list/ocr/docs/tix_dis.html)

US Department of Education  
Office of Civil Rights - Athletics  
[https://www2.ed.gov/about/offices/list/ocr/docs/tix\\_dis.html](https://www2.ed.gov/about/offices/list/ocr/docs/tix_dis.html)

US Department of Education  
Title IX Site  
<https://sites.ed.gov/titleix/>





Please  
complete the  
evaluation

# Evaluation Survey - Title IX Training for School Contacts - July 24, 2023

