

# Robbins Schwartz

## K-12 School District Personnel Title IX Decision Maker and Hearing Officer Webinar

November 19, 2020

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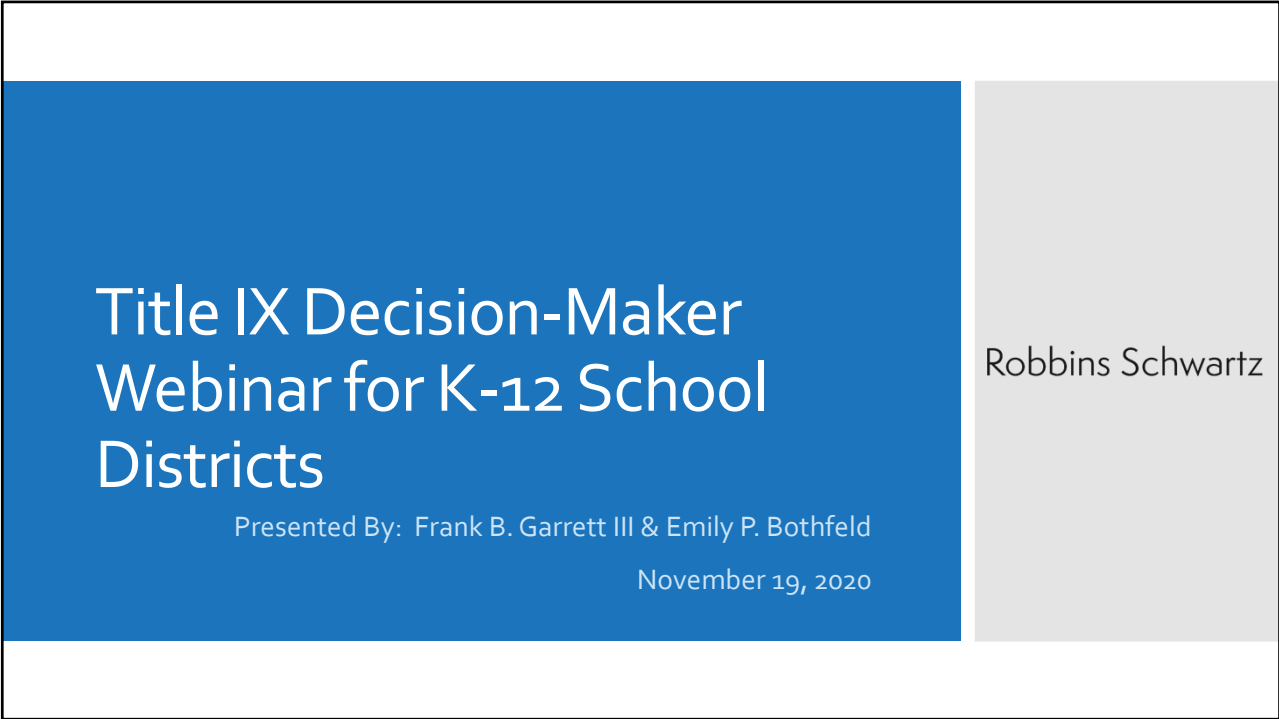
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**Title IX Decision-Maker  
Webinar for K-12 School  
Districts**

Presented By: Frank B. Garrett III & Emily P. Bothfeld

November 19, 2020

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**Overview**

- You have just been appointed to serve as the Decision-Maker for a formal Title IX sexual harassment complaint. Now what?

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Although the information contained herein is considered accurate, it is not, nor should it be construed to be legal advice. If you have an individual problem or incident that involves a topic covered in this document, please seek a legal opinion that is based upon the facts of your particular case.  
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## Decision-Maker's Role Generally

- Review the allegations and supporting evidence.
- Facilitate the written question and answer process equitably and efficiently.



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## Decision-Maker's Role Generally

- Determine responsibility (and sanctions, if appropriate) using preponderance of the evidence standard or clear and convincing evidence standard.
  - Note: PRESS Policy 2:265 uses preponderance standard.
- Issue written determination to both parties simultaneously, with information regarding appeal rights.

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## Overview

1. Check for potential conflicts of interest.
2. Gather investigation materials from Title IX Coordinator or Investigator.
3. Conduct preliminary review of investigation materials.
4. Afford parties an opportunity to submit written questions to be asked of the opposing party and/or witnesses.
5. Determine relevance of submitted questions, then forward to appropriate party and/or witnesses.



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## Overview

6. Provide parties with answers to submitted questions and identify any excluded questions, with rationale for exclusion.
7. Allow for limited follow-up questions.
8. Review investigation materials and additional information from the question-and-answer process.
9. Determine responsibility and, if applicable, associated sanctions and/or remedies.
10. Prepare and issue written determination of responsibility.

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Step 1:  
Check for  
Conflicts of  
Interest

# CONFLICT OF INTEREST



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## Conflicts of Interest

- The Title IX Regulations provide that any individual designated by an institution as a Decision-Maker must not have a conflict of interest.
- Key question: Does the Decision-Maker's prior or existing relationship with or knowledge of a party prevent the Decision-Maker from serving impartially?
- Remember: One of the permissible grounds for appeal is "that the Decision-Maker had a conflict of interest that affected the outcome."
- Identifying and addressing any claims of a conflict prior to making the determination of responsibility may help prevent a later appeal.

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## Conflicts of Interest

- Where you self-identify a conflict of interest, notify the Title IX Coordinator that you will need to recuse yourself.
- Where a party believes you have a conflict of interest, the party must contact the Title IX Coordinator to request a substitution.
- The Title IX Coordinator may request information from you to help him/her evaluate the claim.

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## Conflict of Interest: Hypotheticals

- In each of the following scenarios, what information would be relevant to determining whether you have a conflict of interest?
  - The complaint involves a student complainant and an employee respondent. The employee respondent is your neighbor.
  - The complaint involves two students, one of whom is your childhood best friend's son.
  - You are the Assistant Principal and oversee student discipline. The complaint involves a student whom you have disciplined on several occasions for making inappropriate gestures during class.

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Step 2:  
Gather  
Investigation  
Materials



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Investigation  
Materials

- Relevant materials should include, at a minimum:
  - Formal complaint
  - Notice of Allegations
  - Investigation report
  - Parties' written responses to the investigation report

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## Investigation Materials

- Other relevant materials, if not summarized in investigation report and/or if additional information is needed:
  - Police reports, photographs, video footage, e-mail communications, text messages or other supporting evidence gathered by Investigator
  - The parties' written responses to the evidence
  - Documentation of procedural steps followed during the Investigation
    - \*Note: This information will need to be included in the determination of responsibility letter.

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## Step 3: Preliminary Review



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## Tips for Preliminary Review

- Make a checklist of allegations that need to be proven or disproven.
- This will help you objectively analyze the evidence to avoid bias.

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## Sample Checklist of Allegations

Complainant, a high school student, alleges that Respondent, a teacher, engaged in unwelcome conduct of a sexual nature that a reasonable person would find so severe, pervasive and objectively offensive that it deprived a person equal educational access.

Specific allegations:

Date of Alleged Incident	Complainant's Allegation	Respondent's Response	Other Evidence
8/16/2020	R sent C a private chat message during Zoom class session saying "You look beautiful today. Stay after class?" At the end of class, R verbally asked C to stay in the Zoom session so he could "answer her question about the last quiz." C said she had to go, and signed off with the rest of the class.	R denies messaging C privately and denies ever telling C that she looked beautiful.  R admits he asked C to stay in the Zoom after class so he could answer her question about the quiz.	No copy of private chat message; class was not recorded.  W1 and W2 recall R asking C to stay after class to discuss the last quiz. W1 says C looked "uncomfortable."

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## Tips for Preliminary Review

- Identify any relevant disputed issues of fact between complainant and respondent.
  - Example: On what date did the parties' romantic relationship end?
    - Complainant: October 1, 2020 (prior to alleged sexual assault)
    - Respondent: October 9, 2020 (after alleged sexual assault)

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## Tips for Preliminary Review

- Identify potential follow-up questions for Investigator.
  - Example: Complainant identified three other students who allegedly witnessed Respondent making inappropriate comments of a sexual nature, but the Investigator only interviewed two of those students. Why was the third student not interviewed?

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Step 4:  
Submission of  
Written  
Questions



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Notice of  
Opportunity to  
Submit  
Written  
Questions

- Issue Notice of Opportunity to Submit Written Questions to both parties.
  - If party is a student, letter should be addressed to student's parent/guardian.
- Questions must be submitted to Decision-Maker within five (5) school business days.

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## Written Questions Q&A

- Q: Can a parent/guardian or advisor submit written questions on behalf of a party?



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## Written Questions Q&A

- Q: Can a parent/guardian or advisor submit written questions on behalf of a party?
- A: Yes. Although the right to submit written questions belongs to the party and not to the party's parent/guardian or advisor, a party may elect to have an advisor or parent/guardian prepare the written questions on the party's behalf.
- You should not exclude questions on the basis that the questions appear to have been drafted by someone other than the party.

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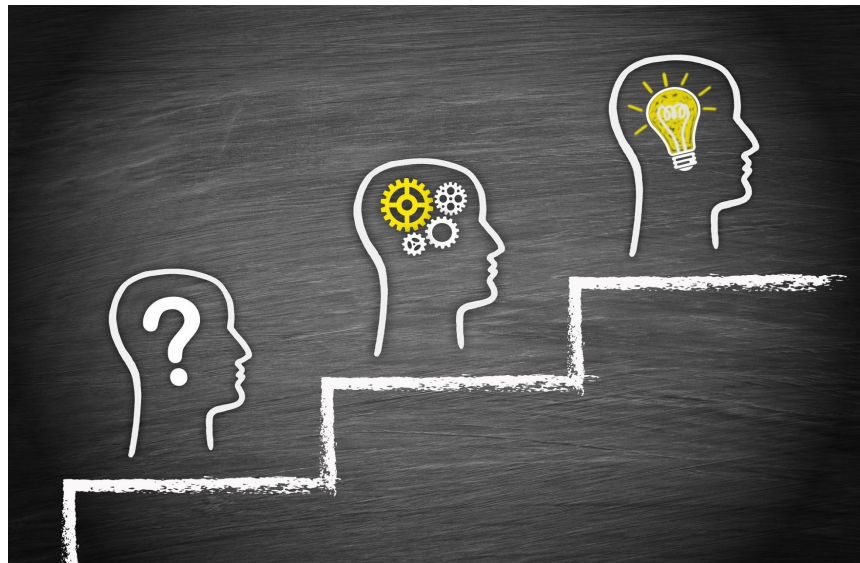
## Written Questions Hypothetical

- You issue the Notice of Opportunity to Submit Written Questions to both parties via U.S. mail and e-mail on Monday, November 9. The deadline to submit written questions is Monday, November 16. On Wednesday, November 18, you go into the office for the first time in three weeks and find a piece of paper in your mailbox containing the Respondent's list of questions. The list is not dated.
  - What should you do?

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## Step 5: Determine Relevance and Forward Relevant Questions



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## Determining Relevance

- Key considerations:
  - Will the question potentially elicit an answer that tends to prove or disprove an allegation?
  - Will the question lead to the discovery of a fact that will inform your decision?

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## Relevance & Rape Shield Protections

- Questions about the complainant's sexual predisposition or prior sexual behavior are not permitted unless:
  - Offered to prove that someone other than the respondent committed the alleged conduct; or
  - Questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

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## Questioning and Relevance Q&A

- Q: May the parties submit written questions to be asked of the Investigator?



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## Questioning and Relevance Q&A

- Q: May the parties submit written questions to be asked of the Investigator?
  - A: Yes, but such questions are subject to the same limitations as other written questions (i.e. they must be relevant).

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## Questioning and Relevance Q&A

- Q: Is the Decision-Maker required to forward written questions to a witness who is not a District student or staff member, such as a law enforcement officer who completed a police report?

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## Questioning and Relevance Q&A



- Q: Is the Decision-Maker required to forward written questions to a witness who is not a District student or staff member, such as a law enforcement officer who completed a police report?
- A: Yes, if the Decision-Maker has the contact information for that witness or is able to obtain the witness' contact information through a reasonable inquiry.

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## Questioning and Relevance Hypotheticals

Which, if any, of the following questions would you exclude? Why?

Complainant's Questions  
for Respondent:

1. Why did you send those photos of me to everyone on the football team?
2. Were you the one who sent the photos of Stacy to the football team?
3. How could you do this to me?

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## Relevance: Hypothetical Questions

Which, if any, of the following questions would you exclude? Why?

Respondent's Questions  
for Complainant:

1. Don't you flirt with Ted all the time?
2. Didn't you and Ted make out under the bleachers at the football game?
3. I heard that it led to more than just kissing, isn't that true?
4. Were you drinking on the night you say I "assaulted" you?

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## Step 6: Issue Notice of Questions Requiring Answers



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## Answering Written Questions

- Forward relevant questions to the party/witness to whom they are directed.
- Allow five (5) school business days for the party/witness to respond.
- After five (5) school business days have passed, issue Notice of Answers to and Exclusion of Submitted Questions to the party who submitted the questions.
  - Attach answers to relevant questions
  - Identify which questions have been excluded and provide rationale for exclusion.

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Answering  
Written  
Questions  
Q&A

- Q: Is the party or witness to whom a question is directed obligated to submit a response?

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Answering  
Written  
Questions  
Q&A

- Q: Is the party or witness to whom a question is directed obligated to submit a response?
  - A: No.



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## Answering Written Questions Q&A

- Q: If the respondent refuses to answer written questions submitted by the complainant, can the decision-maker use the respondent's refusal as a basis to make a finding of responsibility?

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## Answering Written Questions Q&A

- Q: If the respondent refuses to answer written questions submitted by the complainant, can the decision-maker use the respondent's refusal as a basis to make a finding of responsibility?
- A: No. The Decision-Maker should not draw inferences about the determination regarding responsibility based on a party's failure or refusal to answer written questions.

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## Step 7: Allow for Follow-Up Questions



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## Follow-Up Questions

- The Notice of Answers to and Exclusion of Written Questions includes language providing that the party may submit *limited* follow-up questions.
- What does “limited” mean?
  - The regulations do not define the term “limited” and give school districts flexibility to establish reasonable parameters.
  - Duplicative questions and questions that are not relevant or that violate the rape shield protections should be excluded.
  - Follow-up questions should relate to the answers that the party/witness provided during the first round of questioning.

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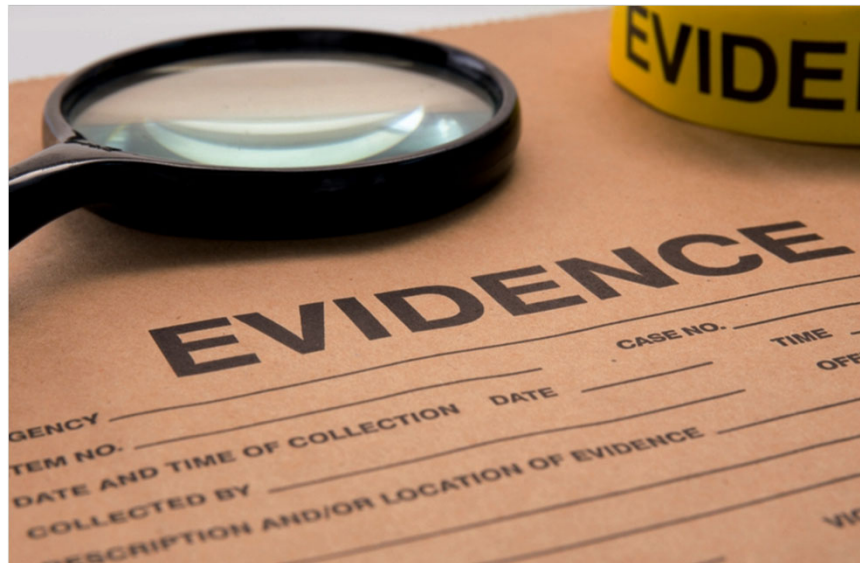
## Follow-Up Questions

- Allow five (5) school business days for parties to submit follow-up questions
- Upon receipt of follow-up questions, review for relevance
- Forward relevant questions to opposing party or witness.
- Wait five (5) school business days for responses.
- Issue Notice of Answers to and Exclusion of Written Questions, with answers attached.
  - Remember to identify any excluded questions, with rationale for exclusion.

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## Step 8: Review Investigatory Materials and Evidence



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## Considering Evidence

- Relevant documents may include, but are not limited to:
  - The formal complaint
  - The initial written notice of the allegations
  - Written statement(s) and responses by the parties and/or witnesses
  - The investigation report
  - Police reports, photographs and/or video footage (if any)
  - Written responses to submitted questions and follow-up questions
  - Prior discipline records
    - Only relevant to issue of appropriate sanction



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## Considering Evidence

- Remember: You may follow up with the Investigator for clarification on any information from the Investigation Report that is unclear.

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Step 9:  
Determine  
Responsibility



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Standard of  
Evidence

- For districts that subscribe to IASB PRESS, Policy 2:265 uses the “preponderance of the evidence” standard.

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## Preponderance of the Evidence Standard

- “More likely than not”
- Whether the facts supporting the allegations have greater weight/strength than the facts presented in denial of the allegations
- If 50/50, no violation.

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## Issues for Determination

- 1) Does the evidence presented establish that the alleged conduct occurred?

### Things to Consider:

Admission or denial by the Respondent	Witness corroboration
Physical evidence (i.e. photographs, video footage)	Prior consistent (or inconsistent) statements by parties and witnesses
Post-incident conduct of the parties	Credibility of parties and witnesses

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## Issues for Determination

### 2) Does the conduct constitute Title IX sexual harassment?

- Title IX sexual harassment includes:
  - Quid pro quo harassment by an employee
  - 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, dating violence, domestic violence or stalking (as defined in Clery Act/VAWA)

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## Issues for Determination

### 3) If the answers to questions 1 and 2 are "yes," what sanctions and/or remedies are appropriate?

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## Determining Appropriate Sanctions and Remedies



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## Determining Appropriate Sanctions

- Goals in determining appropriate sanctions:
  - Educate the respondent on the impact of his/her behavior
  - Prevent future inappropriate behavior by the respondent
  - Deter other individuals from engaging in similar misconduct
  - Maintain a safe school community

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## Determining Appropriate Sanctions

- Aim to strike a balance between consistency and individuality.
- Apply a consistent range of sanctions for a given violation, but consider each case's unique circumstances.



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## Determining Appropriate Sanctions

- Relevant considerations include, but are not limited to:
  - Severity of the misconduct
  - Consequences/impact of the misconduct (both actual and potential)
  - Disciplinary history (or lack thereof)
  - Aggravating or mitigating factors (i.e. respondent's intent/motivation, respondent's willingness to accept responsibility for his/her actions)

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## Determining Appropriate Sanctions: Students

- A combination of administrative sanctions (i.e. warning, probation or suspension) and educational sanctions (i.e. participation in sexual harassment training) is permissible.
- Other possible sanctions include, but are not limited to:
  - Limitations on movement within the school building
  - Limitations on continued participation in extra-curricular activities
  - Ongoing monitoring
- Note: If you are considering suspension or expulsion, ensure compliance with SB 100 (and IDEA for special education students).

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## Determining Appropriate Sanctions: Employees

- Employee sanctions may include a warning, written reprimand, suspension, or recommendation for termination, as well as non-disciplinary sanctions such as training or counseling. 
- It is important to review limitations and requirements under collective bargaining agreements and/or employee policies and procedures.

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## Determining Remedies

- In addition to determining appropriate sanctions, the Decision-Maker must also determine whether any remedies designed to restore or preserve equal access to the District's education program or activity will be afforded to the complainant.

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## Determining Remedies

- Such remedies may include the same "supportive measures" that were afforded to the complainant during the investigation process.
- Unlike supportive measures, however, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the respondent.

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## Determining Remedies

- Examples of potential remedies:
  - Ongoing counseling or mental health supports
  - Academic adjustments or accommodations
  - Modifications to class schedules
  - No-contact directives
  - Other school safety measures



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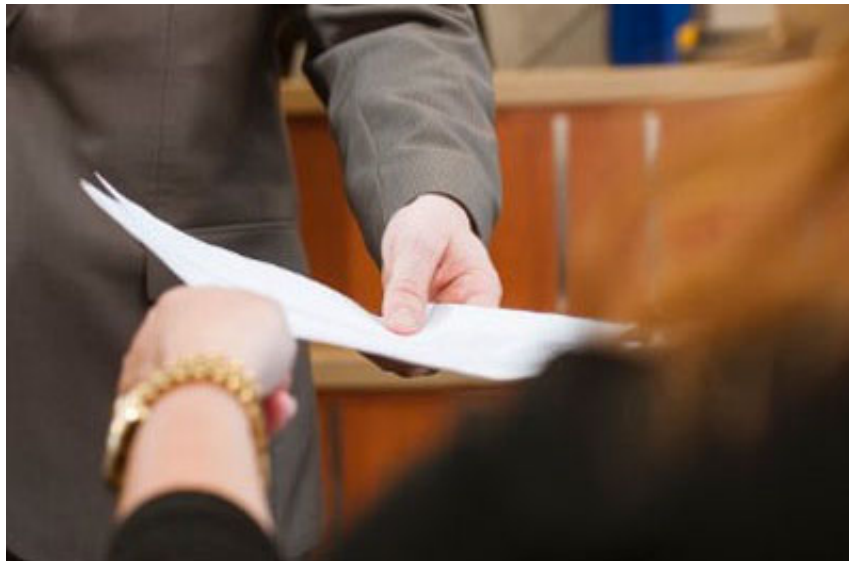
## Implementation of Sanctions and Remedies

- The Title IX Coordinator is responsible for coordinating the effective implementation of any sanctions and/or remedies.
- Be sure to copy Title IX Coordinator on the Written Determination

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## Step 10: Prepare and Issue Written Determination



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## Written Determination

- Must be issued to both parties simultaneously.
- No required timeframe within which determination must be issued, but it should be issued as soon as possible once decision is reached.
- Don't forget to send a copy to the Title IX Coordinator.
- Neither the Title IX regulations nor 2:265-AP<sub>2</sub> contain specific requirements regarding the method of transmission (i.e. via e-mail, U.S. mail, certified mail, etc.).
- As a best practice, issue the letter both electronically and in hard copy.

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## Required Components of Written Determination

- Identification of allegations
  - See initial written notice of allegations and Investigation Report.
- Description of procedural steps taken
  - Should be included in Investigation Report; if not, request information from Title IX Coordinator.

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## Required Components of Written Determination

- Findings of fact supporting determination
  - In most cases, this can be a brief 1-2 paragraph summary.
- Conclusions regarding application of conduct standards
  - General finding of whether the respondent engaged in conduct prohibited by Policy 2:265.

**REQUIRED**

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## Required Components of Written Determination

- Statement & rationale for result of each allegation, including:
  - Determination of responsibility
    - You must conclude whether each specific alleged incident occurred.
    - However, you may consider all alleged incidents as a whole when determining severity, pervasiveness and offensiveness and when determining whether the complainant was deprived equal educational access.
  - Disciplinary sanctions being imposed
    - Disciplinary sanctions must be identified in both the complainant's and respondent's letter.
  - Whether any remedies will be provided to the complainant
    - Need not identify the specific remedies in the respondent's letter, unless such remedies involve the respondent (i.e. a no-contact directive).

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## Required Components of Written Determination

- Procedures and permissible bases for complainant and respondent to appeal
  - Consult 2:265 AP2 for timelines and permissible grounds for appeal.

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Questions?



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Frank B. Garrett III represents school districts, community colleges, local governmental bodies and public and private companies in all aspects of employment law, including complaints and charges of unlawful discrimination, wrongful termination, sexual harassment, civil rights violations, employee discipline and termination. Frank also counsels and provides training to employers in the following areas: ADA and FMLA compliance, avoiding claims of unlawful discrimination and harassment in the workplace: evaluation and discipline of employees, and diversity in the workplace.

Frank represents and defends clients in both state and federal courts, at the trial and appellate levels. He also practices before various administrative agencies such as the Illinois Educational Labor Relations Board, the Illinois Human Rights Commission and the Equal Employment Opportunity Commission. Frank is a regular speaker on employment law topics at both the state and national level.

Frank is approved by the Illinois State Board of Education to provide school board member training. He is an active member of the American Bar Association and Illinois Council of School Attorneys.

### **AWARDS**

Illinois Leading Lawyer, Government and Regulatory-Related  
Illinois Leading Lawyer, Employment and School Law  
Illinois Super Lawyers

### **RECENT PUBLICATIONS**

"Extended Medical Leave Under ADA Soundly Rejected by 7th Circuit,"  
*Chicago Daily Law Bulletin* (2017)

"First Amendment Protections Get Broader for Government Employees,"  
*Chicago Daily Law Bulletin* (2016)

"Big-box Employee's Attempt to 'Scam' Company Undercuts FMLA Claims,"  
*Chicago Daily Law Bulletin* (2015)

Employers Must Rethink Employee 'Look' Policies After High Court Decision,"  
*Chicago Daily Law Bulletin* (2015)



### **PRACTICE AREAS**

Education Law  
Labor & Employment  
Litigation

### **EDUCATION**

J.D., DePaul University  
College of Law

B.A., Oberlin College

### **ADMITTED TO PRACTICE**

Supreme Court of the  
United States

U.S. Court of Appeals for  
the Seventh Circuit

Trial Bar of the U.S.  
District Court for the  
Northern District of Illinois

U.S. District Court for the  
Northern District of Illinois

U.S. District Court for the  
Central District of Illinois

U.S. District Court for the  
Southern District of Illinois

Supreme Court of Illinois

“Using Social Network Screening as Part of the Hiring Process: Employers Should Proceed with Caution,” *Inquiry & Analysis*, National School Boards Association’s Council of School Attorneys (2013)

Contributing author, “Employment Discrimination,” *ILLINOIS SCHOOL LAW*, IICLE (1996, 1999, Supp. 2001, 2005, 2010 and 2012)

#### **RECENT PRESENTATIONS**

*Debunking Some Common Employee FMLA Leave Myths*, IASPA Annual Conference (January 2020)

*Legislative Update: A Review of New Laws Affecting Illinois Community Colleges*, Illinois Council of Community College Presidents Retreat (September 2019)

*Understanding New Changes to the Minimum Wage Law and Other Wage-Related Statutes*, Illinois GFOA Annual Conference (September 2019)

*Navigating the Legal Liability Minefield in the Recruitment, Interview and Selection of Qualified Applicants*, AASPA Personnel Administrator Boot Camp (June 2018)

*The Ever-Changing Landscape Under Title IX*, Joint meeting of Illinois Community College Presidents, Chief Academic Officers and Chief Student Services Officers (January 2017)

*Practical Guidance on Employee Misconduct Investigations and Discipline*, Illinois Association of School Personnel Administrators, Tenth Annual State Conference (January 2017)

#### **ORGANIZATIONS**

American Bar Association,  
Section on Labor and  
Employment

Chicago Bar Association

Cook County Bar  
Association

Illinois Council of School  
Attorneys

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## EMILY P. BOTHFELD

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Emily practices in the area of education law with a focus on student and higher education matters. She counsels school districts and higher education institutions on a variety of issues, including matters related to student discipline, Title IX, free speech, student disability rights, student data privacy and policy development. She has extensive experience representing educational institutions in responding to complaints filed with the U.S. Department of Education's Office for Civil Rights, Illinois State Board of Education, Office of the Illinois Attorney General and Illinois Department of Human Rights. Emily regularly represents school districts and higher education institutions in state and federal court on civil rights and constitutional claims and breach of contract claims.

Prior to joining Robbins Schwartz, Emily represented students with disabilities in special education matters. Emily attended the George Washington University Law School, where she was a member of the George Washington International Law Review and the GW Law Moot Court Board. Prior to attending law school, Emily taught high school mathematics and science in Hangzhou, China.

### RECENT PUBLICATIONS

"Disabled Athlete Can't Support ADA Claims," *Chicago Daily Law Bulletin* (2018)

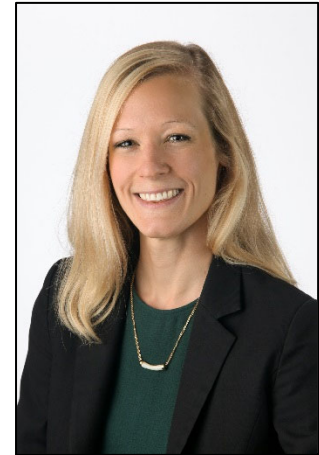
### RECENT PRESENTATIONS

*Legislative Update: A Review of New (and Proposed) Laws Affecting Illinois Community Colleges' Risk Management Practices*, Illinois Community College Chief Financial Officers Fall Conference (October 2019)

*A Student's "Right" to a College Education: Due Process Rights in Academic and Non-Academic Discipline*, Illinois Community College Chief Student Services Officers' Summer Meeting (June 2019)

*Updates and Recent Developments out of the U.S. Department of Education*, Chicago Bar Association Education Law Committee Spring Seminar (March 2019)

*Legal Hot Topics for Nursing Program Administrators and Faculty*, Illinois Organization of Associate Degree Nursing (March 2019)



### PRACTICE AREAS

Education Law  
Special Education  
Student Discipline

### EDUCATION

J.D., *with honors*, George Washington University Law School

B.S., *cum laude*, Vanderbilt University

### ADMITTED TO PRACTICE

U.S. Court of Appeals for the Seventh Circuit

U.S. District Court for the Northern District of Illinois

Supreme Court of Illinois

### ORGANIZATIONS

Chicago Bar Association

Illinois Council of School Attorneys

National Council of School Attorneys