

TIXEdu

K-12 TITLE IX COORDINATOR TRAINING

MARCH, 2022

PROVIDED BY:
TIX EDUCATION SPECIALISTS

WWW.TIXEDU.COM
503-960-8261

INSTRUCTOR: JACKIE SANDMEYER

Jackie Sandmeyer is the Founder and Principal of TIX Education Specialists. They received their Bachelor of Science from University of Idaho and Juris Doctor at Willamette University of Law. After creating the country's first statewide Title IX training and technical assistance program for colleges and universities, Jackie sought to fill the need for further capacity in training and consultation related to sexual harassment and interpersonal violence nationally. They have worked with colleges and universities, law enforcement,



state agencies, and community based service providers to identify and create some of the nation's leading models in Title IX and student services. From pioneering education based legislation that spread to other states to developing new and emerging school based investigation techniques, Jackie and their team bring this experience and more to TIX and its clients.

Jackie Sandmeyer, JD
founder | principal

Email: jackie@tixedu.com
Phone: 503-709-8848

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Let our team of highly trained and experienced investigators help you stay on top of challenging cases and expanding case loads.

ABOUT: TIX EDUCATION SPECIALISTS

About TIX Education Specialists

TIX Education Specialists sets itself apart from other training and consultation bodies in that it offers guidance and training on not only what is compliant, but what is known to be best practice and trauma-informed. We don't believe that one model fits all. Instead, TIX brings years of expert experience to identify solutions that serve you and your community best.

Our Mission - Bridging Compliance & Best Practice

Successful responses by schools take not only compliant policies and strategies, but must also include techniques rooted in emerging best practice. While many firms solely provide schools with what the law requires, TIX Edu goes a step further by ensuring that schools understand what implementation looks like, and how mandates integrate with institutional missions. Schools are tasked with the safety of students as well as creating and fostering an environment for students to reach their fullest potential. Let TIX Edu assist with the hard work of identifying the path to get there.

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TIX Education Specialists

“Bridging compliance and best practice.”

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MEMBERSHIP

Become a member of TIX Edu's network and receive email alerts, resources, networking opportunities, technical assistance and more.

DAY 1



MARCH 7, 2022



OVERVIEW OF Title IX: Understanding The Purpose

An overview of the tenants of Title IX including the purpose of Title IX, how to navigate guidance and resources provided by the USDOE and OCR. A look at how schools can bridge compliance with Title IX with best practices in serving students and staff and building better processes.

Learning Objectives:

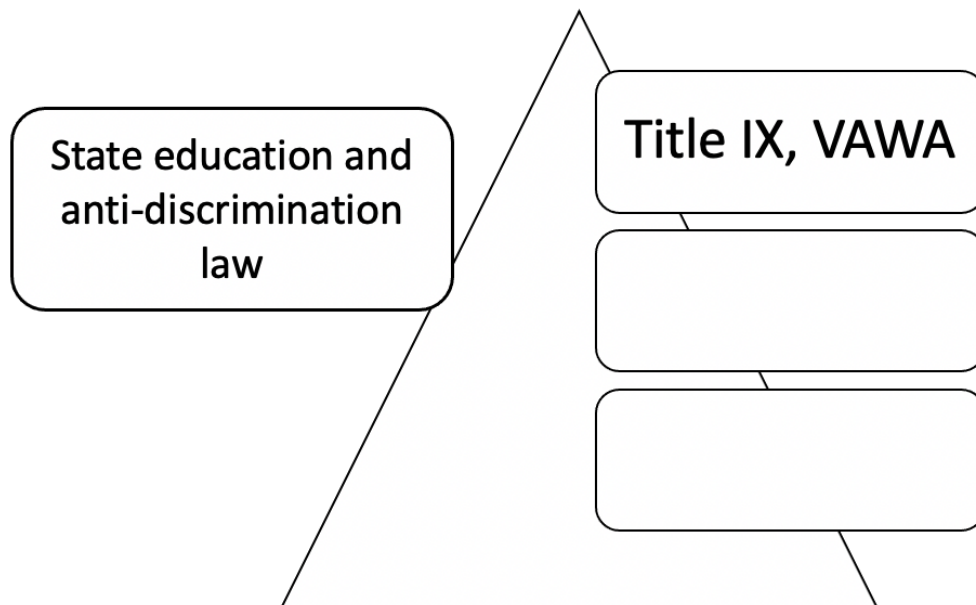
- Develop a clear understanding of requirements of Title IX
- Understand the scope and limitations of Title IX and how that intersects with best practices
- Identify where regulations begin and end and where institutional discretion can guide school's decisions

Title IX encompasses more than just sexual harassment.

Main areas of Title IX **not an exhaustive list:*

- sexual harassment
- retaliation
- athletics
- single sex educational programs and activities
- gender identity and gender expression
- pregnant and parenting students

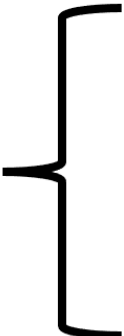
Notes:



Language and Title IX:

Notes:

Sex based
discrimination

- 
1. Sexual harassment
 2. Sexual Assault
 3. Domestic Violence
 4. Dating Violence
 5. Stalking

Who does title IX apply to?

Exemptions:

Office for Civil Rights:

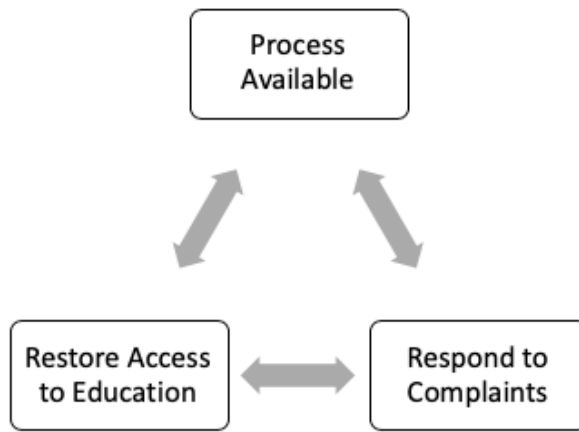
Current Title IX regulations are NOT retroactive in their application.

← **Did conduct occur before
or after August 14, 2020?** →

Notes:

District discretion:





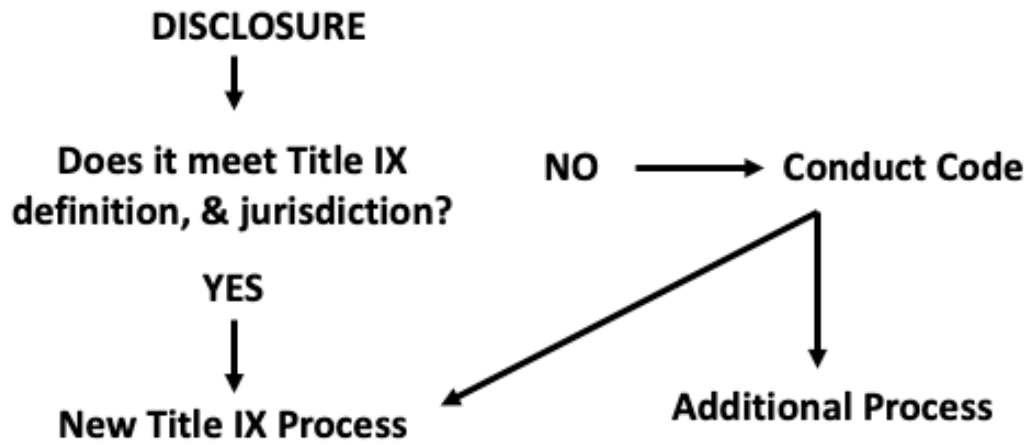
Narrowing of Title IX:

“A recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States to respond promptly in a manner that is not deliberately indifferent, meaning not clearly unreasonable in light of the known circumstances.”

“If the allegations in a formal complaint do NOT meet the definition of sexual harassment, or [jurisdiction], ... the school must dismiss such allegations for purposes of Title IX.... BUT may still address allegations in any manner the school deems appropriate under the school’s own code of conduct.”

1. Does the district want to create policies to respond to “other” types of sexual harassment and sex discrimination?

2. If you capture “other” types of conduct, do you use one process provided by the federal regulations or do you use two?



Basic administrative requirements:

- 1.
- 2.
- 3.

TITLE IX COORDINATOR:

Training Considerations:

NOTICE OF NON-DISCRIMINATION:

“[Institution] does not discriminate on the basis of sex in education programs or activities it operates including admissions and employment...”

Notice of non-discrimination:

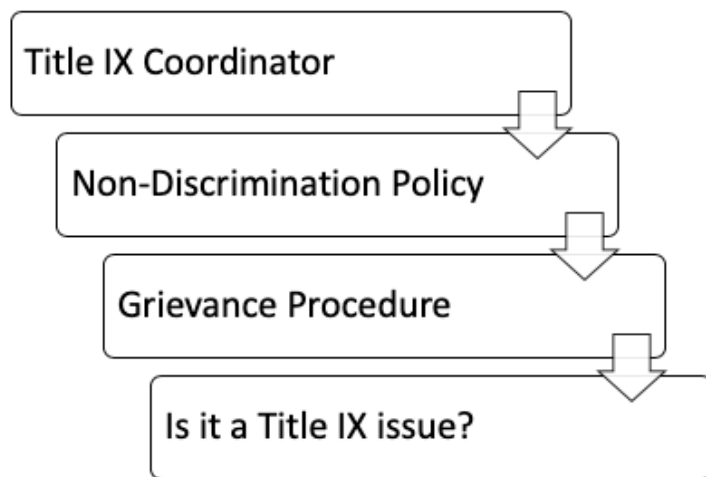
Grievance procedure:

Grievance procedure: **not exhaustive list*

- Definitions
- How to file a complaint
- Contact information of Title IX Coordinator
- Process available
- Prohibition of retaliation
- Evidence standard used
- Scope of sanctions
- Appeals process
- Impartial investigations
- Support measures
- Party notice
- Whether informal process offered
- Presumption that respondent not responsible
- Reasonably prompt timeframes
- Range of remedies
- Whether sanctions for providing false information

All non-Title IX mandated policies must be applied equitably to all parties.

Dissemination:



Notes:



DAY 2



MARCH 8, 2022

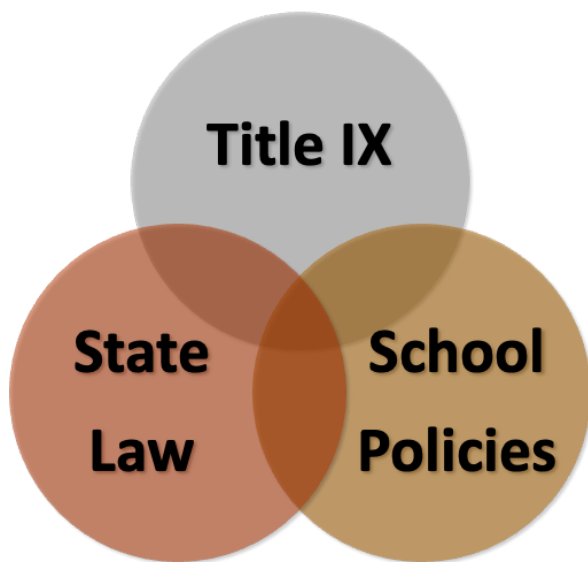


Jurisdiction, Reports and Dismissals

An overview of what types of complaints fall under the scope of Title IX as well as other available types of jurisdiction such as mandated state law and district student code of conduct policies.

Learning Objectives:

- Define types of conduct that constitute sex discrimination under Title IX
- Identify jurisdictional requirements including defining "educational program or activity"
- Understand types of reports including a "formal complaint"
- Execute dismissals when necessary and appropriate



Jurisdiction:

“A recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States to respond promptly in a manner that is not deliberately indifferent, meaning not clearly unreasonable in light of the known circumstances.”

Title IX Jurisdiction Considerations:

1. Type of conduct
2. Educational program or activity
3. Person in the United States

Non-Sexual Harassment:

Sexual Harassment

- 1.
- 2.
- 3.
- 4.
- 5.

Notes:



Sexual Harassment:

1. Sexual harassment
2. "Quid pro quo" harassment
3. Sexual assault

"Quid Pro Quo" Harassment:

"An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct." 34 CFR 106.30(a)(1)

Sexual Harassment:

"Unwelcome conduct that a reasonable person would determine is so severe, pervasive and objectively offensive that it effectively denies person's equal access to education." 34 CFR 106.30(a)(2)

Using a reasonable person standard:

1. severe;
2. pervasive;
3. objectively offensive; AND
4. effective denial

Sexual Harassment:

"Clery Act/VAWA offenses are NOT evaluated for severity, pervasiveness, offensiveness or denial of equal educational access ... because such conduct is sufficiently severe..."

Sexual Assault:

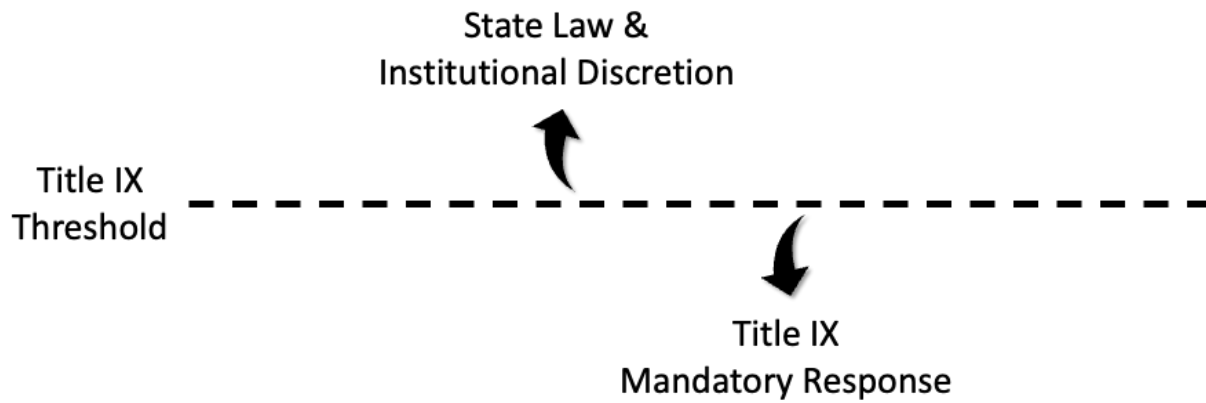
“[M]eans an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the [FBI]”

- | | |
|----------------------------------|-------------------|
| 1. Rape | 4. Fondling |
| 2. Sodomy | 5. Incest |
| 3. Sexual assault with an object | 6. Statutory rape |

“If the allegations in a formal complaint do NOT meet the definition of sexual harassment, or [jurisdiction], ... the school must dismiss such allegations for purposes of Title IX.... BUT may still address allegations in any manner the school deems appropriate under the school’s own code of conduct.”

Federally required minimum:

“OCR does not enforce school codes of conduct but may investigate complaints that a school’s code of conduct treated students differently based on sex, including sexual orientation or gender identity.”



Notes:

"Person in the United States"

"A recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States, must respond promptly in a manner that is not deliberately indifferent." 34 CFR 106.44(a)

"Education program or activity"

1. School exercised substantial control over...

AND

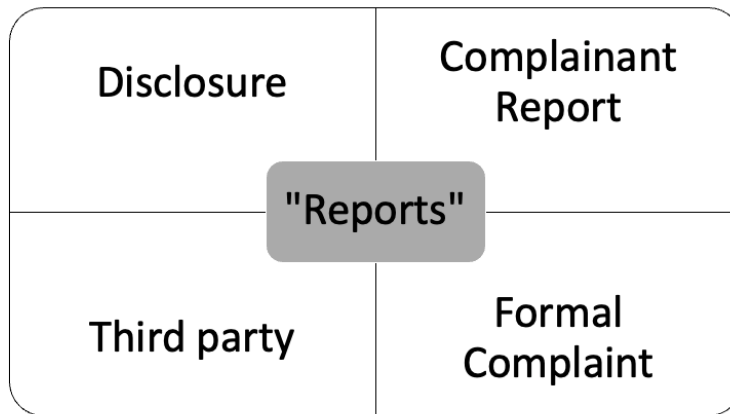
2. School exercised substantial control over....

What if the complaint doesn't fall under Title IX?

“Any person may be a complainant or a respondent, regardless of whether the person is a student, employee, or otherwise affiliated with the [school].”

Notes:

Language matters:



Reports:

Formal Complaint:

"[A] document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegation of sexual harassment." 34 CFR 106.30(a)

Responding to formal complaints:

Dismissals:

Appropriate bases for dismissal:

Dismissal procedure:

Available bases for appeal:

1. procedural irregularity
2. new evidence
3. conflict of interest or bias

"Deliberate indifference"

SEXUAL HARASSMENT:

1. An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity;
or
3. "Sexual assault" as defined in 20 U.S.C. § 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30).

SEXUAL ASSAULT:

"[M]eans an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting [UCR] system of the Federal Bureau of Investigation [FBI]." 20 U.S.C. § 1092(f)(6)(A)(v)

****NOTE:** FBI switch from SRS to NIBRS January, 2021

FBI SEX OFFENSES (NIBRS)

Rape: The carnal knowledge of a person, 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 or physical incapacity.

Sodomy: Oral or anal sexual intercourse with another person, 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 or physical incapacity.

Sexual Assault With An Object: To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, 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 or physical incapacity.

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 or physical incapacity.

FBI SEX OFFENSES (NIBRS) Continued

Incest: Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Nonforcible sexual intercourse with a person who is under the statutory age of consent.

VAWA OFFENSES:

Dating violence 34 U.S.C. § 12291(a)(10)

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant; where the existence of such a relationship shall be determined based on a consideration of the following factors: (1) The length of the relationship (2) The type of relationship (3) The frequency of interaction between the persons involved in the relationship.

VAWA OFFENSES Continued

Domestic Violence 34 U.S.C. § 12291(a)(8)

Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the complainant, by a person with whom the complainant shares a child in common, by a person who is cohabitating with or has cohabitated with the complainant as a spouse or intimate partner, by a person similarly situated to a spouse of the complainant under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth complainant who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Stalking 34 U.S.C. § 12291(a)(30)

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress.



DAY 3-4



MARCH 9-10, 2022

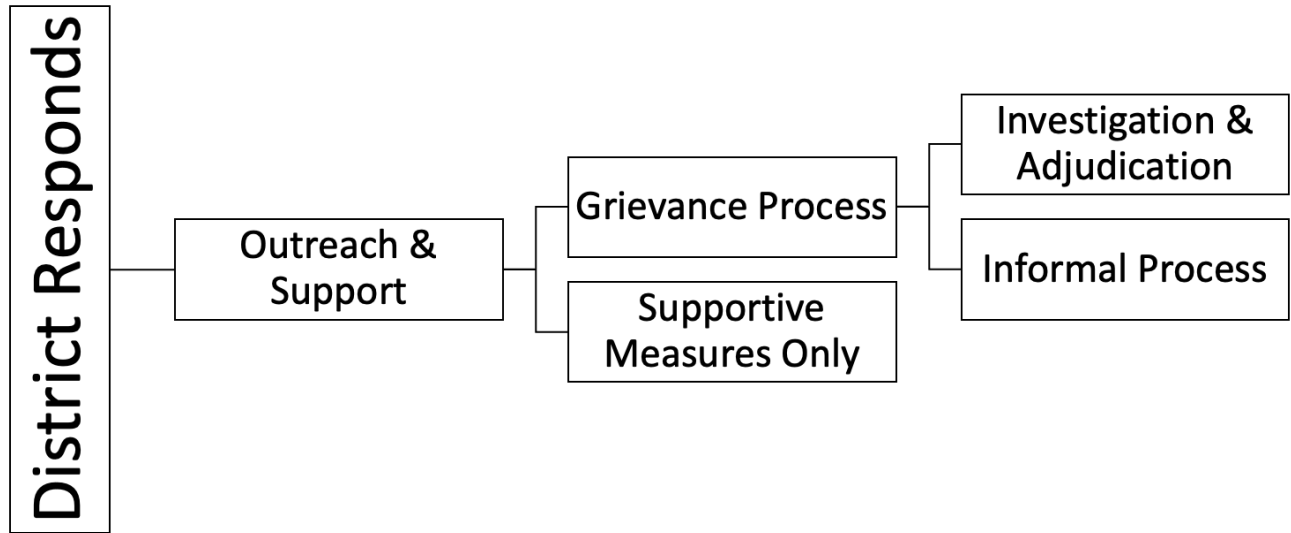


TITLE IX RESPONSE PROCESS: Notice, formal complaint, investigation and determination

A look at the larger Title IX response process starting with determining when a district is on "notice" through to the investigation and decision-maker's ultimate determination.

Learning Objectives:

- understand what stages of Title IX investigation are from formal complaint to factual findings
- identify rights of parties and requirements under Title IX
- look at role of investigator, Title IX Coordinator and decision-maker(s)



Notes:

General guiding principles:

- "written grievance procedure"
- "deliberate indifference"
- Equitable treatment

Respondent considerations:

- no sanctions or punitive actions (exception: emergency removals)
- presumption of not responsible

“presumption does not imply that the alleged harassment did not occur.” “or that the respondent is truthful or a complainant is untruthful.”

Simultaneous investigation by law enforcement:

"Reasonably prompt"

"Not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence."

34 CFR 106.45(b)(5)(iii)

Parents/Guardians:

USDOE Example Policy, July 2021 Questions and Answers:

"Consistent with the applicable laws of the jurisdiction in which the school is located, a student's parent or guardian must be permitted to exercise the rights granted to their child under this school's policy, whether such rights involve requesting supportive measures, filing a formal complaint, or participating in a grievance process. A student's parent or guardian must also be permitted to accompany the student to meetings, interviews, and hearings, if applicable, during a grievance process in order to exercise rights on behalf of the student. The student may have an advisor of choice who is a different person from the parent or guardian."



“A recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States to respond promptly in a manner that is not deliberately indifferent, meaning not clearly unreasonable in light of the known circumstances.” 34 CFR 106.30(a)

Actual knowledge - When is a district on notice?

“[S]chool has a Title IX obligation to provide all students, not just the complainant, with an educational environment that does not discriminate based on sex.”

Initial Response:

“The Title IX Coordinator must promptly contact the complainant to discuss the availability of supportive measures as defined in § 106.30, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.” 34 CFR 106.44(a)

Supportive Measures:

Process counseling:

Formal complaint: "A document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegation of sexual harassment." 34 CFR 106.30(a)

Formal Complaint:

Notice of Allegation:

Informal Resolution Process:

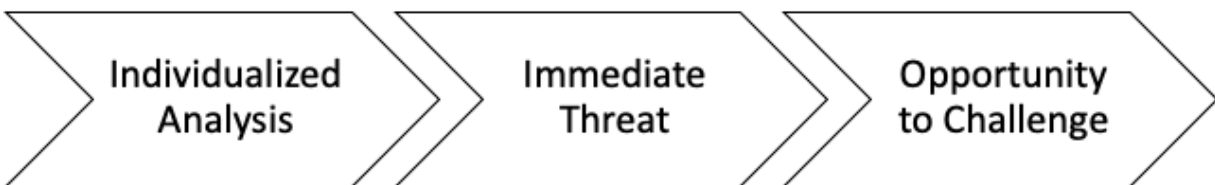
“If the allegations in a formal complaint do NOT meet the definition of sexual harassment, or [jurisdiction], ... the school must dismiss such allegations for purposes of Title IX.... BUT may still address allegations in any manner the school deems appropriate under the school’s own code of conduct.”

Dismissals:

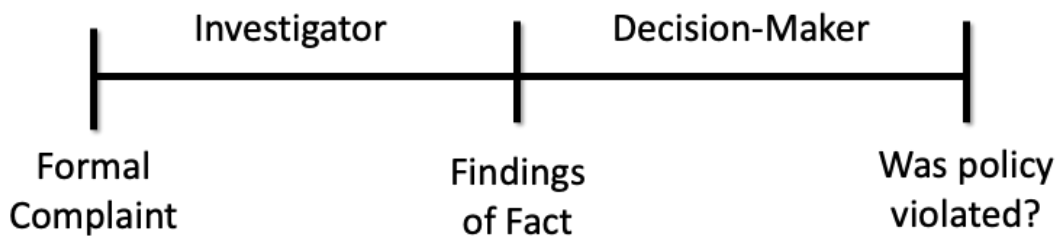
Must dismiss:

May dismiss:

Dismissal procedure:

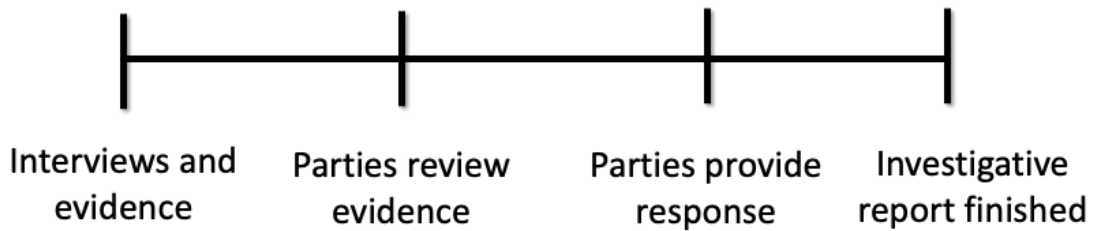


Investigation models:



Advisor of choice:

Notice of investigation:



Evidence:

Advisor of choice:

“[H]owever, the recipient may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties.”
34 CFR 106.45(b)(5)(iv)

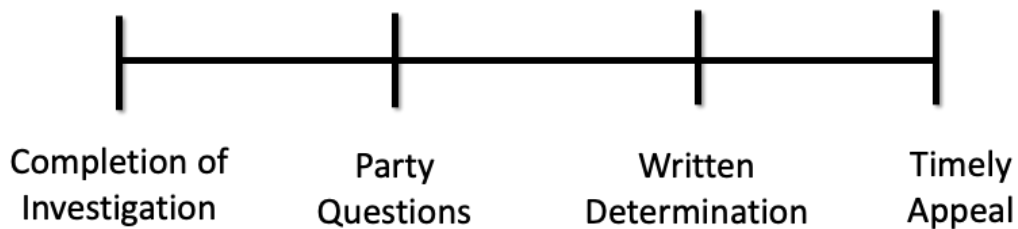
Investigative interviews:

Party review of evidence:

Investigative Report:

"For recipients that are elementary and secondary schools, and other recipients that are not postsecondary institutions, the recipient's grievance process may, but need not, provide for a hearing."
34 CFR 106.45(b)(6)(ii)

Decision-Maker:



"[B]efore reaching a determination regarding responsibility, the decision-maker(s) must afford each party the opportunity to submit written, relevant questions that a party wants asked of any party or witness, provide each party with the answers, and allow for additional, limited follow-up questions from each party."

34 CFR 106.45(b)(6)(ii)

Party Questions:

Considerations:

- Relevancy
- Redundancy
- Inculpatory and exculpatory evidence
- Privileged information
- Sexual predisposition and sexual behavior

Written determination:

Remedies:

Appeals:

DAY 5



MARCH 11, 2022



Title IX Appeals

An overview of types of appeals that may occur during the Title IX response process, and how to appropriately resolve them utilizing the institution's Title IX grievance procedure.

Learning Objectives:

- Identify available bases for a party to appeal and which types of determinations may be appealed.
- Understand how to execute appropriate procedure for resolving appeals.

NOTE:

The following appeal processes outline the requirements under Title described in 34 CFR 106.45(b)(8). Investigations that arise out of jurisdiction created under state law or institutional student conduct policy may have appeals processes that differ.

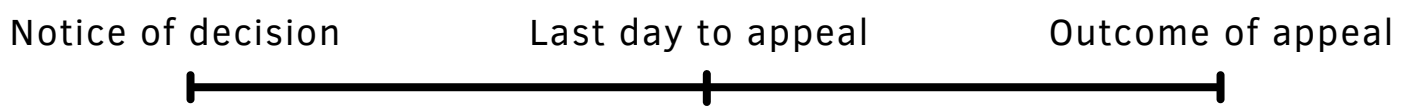
What is the purpose of an appeal?

Written procedure policy:

"A recipient's grievance process must... include the procedures and permissible bases for the complainant and respondent to appeal..."
34 CFR 106.45(b)(1)(viii)

When is a decision "final"?

- 1.
- 2.



What can be appealed?

1. dismissal of formal complaint or allegation within
2. determination of responsibility

Dismissals:

Available bases for appeal:

1. procedural irregularity
2. new evidence
3. conflict of interest or bias



Required bases for appeal to be included in policy.

Additional (optional) bases for appeal:

"A recipient may offer an appeal equally to both parties on additional bases." 34 CFR 106.45(b)(8)(ii)

Procedural Irregularity:

"Procedural irregularity that affected the outcome of the matter."

34 CFR 106.45(b)(8)(i)(A)

New Evidence:

"New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter."

34 CFR 106.45(b)(8)(i)(B)



What is the process for parties to file an appeal?

How must appeals be resolved?

34 CFR 106.45(b)(8)(iii)



"Reasonably prompt time frames:"

Written notification of appeal:

Decision-Maker:

- Did not make the initial decision that is being appealed.
- Is not the Title IX Coordinator.
- Is not the Investigator.
- No conflict of interest or bias.
- Received training.

Parties' opportunity to respond:

Written outcome:

[Bases for
Appeal] + [Appeal
Decision] + [Rationale]

Notes:

APPEALS: 34 CFR 106.45(b)(8)

(i) A recipient must offer both parties an appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

(A) Procedural irregularity that affected the outcome of the matter;

(B) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and

(C) The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

(ii) A recipient may offer an appeal equally to both parties on additional bases.

(iii) As to all appeals, the recipient must:

(A) Notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties;

(B) Ensure that the decision-maker(s) for the appeal is not the same person as the decision-maker(s) that reached the determination regarding responsibility or dismissal, the investigator(s), or the Title IX Coordinator;

APPEALS CONT'D: 34 CFR 106.45(b)(8)

(C) Ensure that the decision-maker(s) for the appeal complies with the standards set forth in paragraph (b)(1)(iii) of this section;

(D) Give both parties a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome;

(E) Issue a written decision describing the result of the appeal and the rationale for the result; and

(F) Provide the written decision simultaneously to both parties.

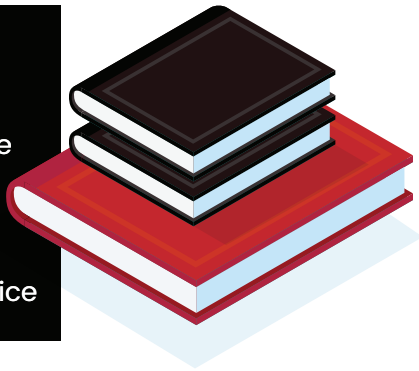
TITLE IX INFORMAL RESOLUTION

A recipient is not required to offer an informal resolution process. A recipient must offer the outlined formal process. A recipient may offer more than one type of informal process. Either party may withdraw before the conclusion of the informal process and resume the formal process. An informal resolution process may not be used in cases of staff misconduct perpetrated on a student.

PROCESSES

May include but are not limited to:

- ▶ Arbitration
- ▶ Mediation
- ▶ Restorative Justice



NOTICE

- Information about any process available.
- Consequences resulting from participating in any process.
- What records will be maintained or could be shared.
- Whether facilitators may be called as a witness in adjudicatory processes.
- If an admission of responsibility would be considered in a formal process.

REQUIREMENTS

- ▶ A formal complaint has been filed.
- ▶ Informal process is entered into voluntarily in writing by both parties.
- ▶ The right to a formal process may not be waived.
- ▶ Reasonably prompt timeframes.
- ▶ Where the complainant or respondent is a minor or legally incompetent person, then the party's parent or legal guardian will receive the required written notice and may act on behalf of individuals exercising Title IX rights or involved in Title IX proceedings.

DISCRETION

- ▶ Confidentiality of informal records.
- ▶ If informal resolution facilitators may be called as witnesses in formal hearing processes.
- ▶ If admission of responsibility within an informal process may be used against a respondent in a formal process.
- ▶ If investigation occurs within an informal process.
- ▶ If and what disciplinary measures that may result from an informal process.
- ▶ If a safety and risk assessment must be performed before entering into an informal resolution process.
- ▶ If parties may directly interact throughout the process.
- ▶ Whether a facilitator can directly question parties.

TRAINING

Individuals facilitating informal resolution must be free from conflicts of interest, bias, and trained to serve impartially.



106.45(B)(9)

NOTE:

Informal processes, in addition to a grievance procedure that provides for an investigation, are one option that schools can make available to resolve complaints but is not mandated.

Language:

"A recipient may not require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to an investigation and adjudication of formal complaints of sexual harassment consistent with this section. Similarly, a recipient may not require the parties to participate in an informal resolution process...."

34 CFR 106.45(b)(9)

Consent to participate:

Confidentiality:

Appropriateness:

“Recipients may not offer informal resolution unless a formal complaint has been filed.”

Informal v. Formal:

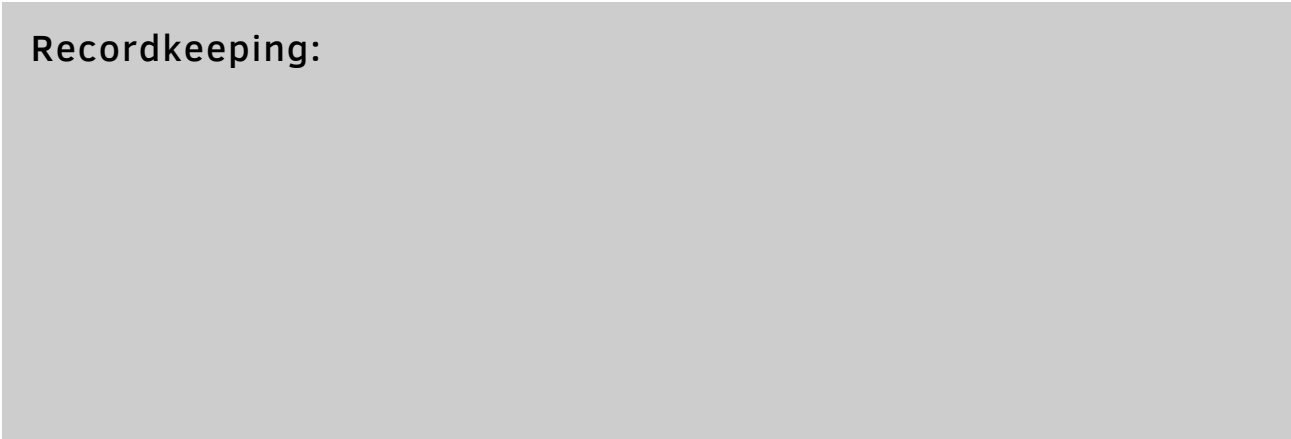
Training and qualification considerations:

“Nothing in §106.45(b)(9) requires an informal resolution process to involve the parties confronting each other or even being present in the same room.”

Conflict considerations:

Outcomes:

Recordkeeping:





NON-SEXUAL HARASSMENT TOPICS OF TITLE IX

A look at other forms of sex-discrimination outside sexual harassment including athletics, pregnant and parenting students, gender identity and single sex education programs and activities.

Learning Objectives:

- Understand scope of reports that may constitute sex discrimination under Title IX
- Identify the tests and facial reviews applied to determining whether a report may constitute sex discrimination
- Overview of appropriate actions and preventative measures a school can take

Areas of Title IX: *Not an exhaustive List

- Sexual harassment
- Retaliation
- Athletics
- Single sex education program or activity
- Gender identity and gender expression
- Pregnant and parenting students

Application of 2020 Regulation Changes:

“While the proposed regulations mainly address sex discrimination in the form of sexual harassment, the Department will also continue to enforce Title IX in non-sexual harassment contexts including athletics and equal access to areas of study such as STEM Fields.”

Response to Non-Sexual Harassment

Discrimination based on sex:

- Different treatment
- Disparate impact
- Sexual Harassment

Different Treatment:

Circumstantial Evidence:

- Did the school representative treat a student differently from a similarly situated student of the opposite sex?
- Did the different treatment occur in the course of the school representative's authorized or assigned duties or responsibilities?
- Can the school articulate a legitimate, non-discriminatory reason for the different treatment?
- If they can articulate such a reason, is it pretext for discrimination?

Disparate Impact:

Disparate Impact:

- Facially neutral policy that has disproportionate impact on class of sex
- Whether substantially legitimate justification - “necessary to meeting a goal that was legitimate, important, and integral to the [recipient's] institutional mission.”
- Whether there are any "equally effective alternative practices" that would result in less adverse impact

"Non-Sexual" Sexual Harassment:

Understanding Language:

- gender expression
- gender identity
- sex
- sexual orientation

Protections that have always existed:

Gender expression & sex-stereotyping:

Bostock v. Clayton County:

- Discrimination based on sexual orientation and/or gender identity inherently involve treating individuals differently because of their sex.
- Discriminate against person for “traits or actions it would not have questions in members of a different sex.”

Current OCR interpretation:

“Title IX prohibits discrimination based on sexual orientation and gender identity.”

Pregnant and Parenting Students:

“[S]chool requires a doctor’s note from all students who have a physical or emotional condition requiring treatment by a doctor.”

Athletics:

1. Accommodation of student interests and abilities
2. Equivalence in athletic benefits and opportunities

“An institution must effectively accommodate the athletic interests and abilities of students of both sexes to the extent necessary to provide equal athletic opportunity” - OCR's 1979 Policy Guidance

Accommodation of student ability and interest:

Three compliance options:

1. Whether participation opportunities for male and female students are proportionate to enrollment.
2. Members of one sex have been and are underrepresented BUT institution can show a history of continuing practice of program expansion.
3. Members of one sex underrepresented and institution can NOT show a history of program expansion BUT can demonstrate that interests and abilities fully and effectively accommodated.

Interest and abilities:

Equivalence in athletic benefits and opportunities

Single Sex Programs and Activities:

General Rule:

A recipient (of federal funds) shall not provide or otherwise carry out any of its education programs or activities separately on the basis of sex or require or refuse participation therein by any of its students on the basis of sex.

Single-sex education programs or activities:

School's "important objective"

- To improve educational achievement of its students, through the school's overall established policy to provide diverse educational opportunities, provided that the single sex nature of the class or activity is substantially related to achieving that objective, or
- To meet the particular, identified educational needs of its students, provided that the single sex nature of the class or activity is substantially related to achieving that objective.

Other factors:

"Substantially Equal"