



INSTITUTIONAL COMPLIANCE SOLUTIONS

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Institutional Compliance Solutions

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2026 Virtual Civil Rights Compliance Training



About Us



OUR MISSION

To provide the best Care and Support for our clients, Community Partners, employees, contractors, collaborators, vendors, and all others who encounter our company.



GOAL

To assist schools and districts in providing a safe and healthy learning and working environment for students, faculty and staff.





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Agenda

01 The State of Events

02 Refresh of Title VI, VII, & IX

03 Freedom of Speech

04 ADA and Pregnancy Challenges

05 Challenges to Investigations and Report Writing

06 Delivering Decisions

07 Compliance with Compassion

08 Q&A Session

REALITIES:

- ✔ Being asked to do more with less
- ✔ Compliance is ever expanding
- ✔ Expectations of community
- ✔ Increase in reporting
- ✔ Rapid speed of this administration



WHAT IS HAPPENING?!

2025/2026

**Executive
Orders**



Litigation



**Supreme
Court**



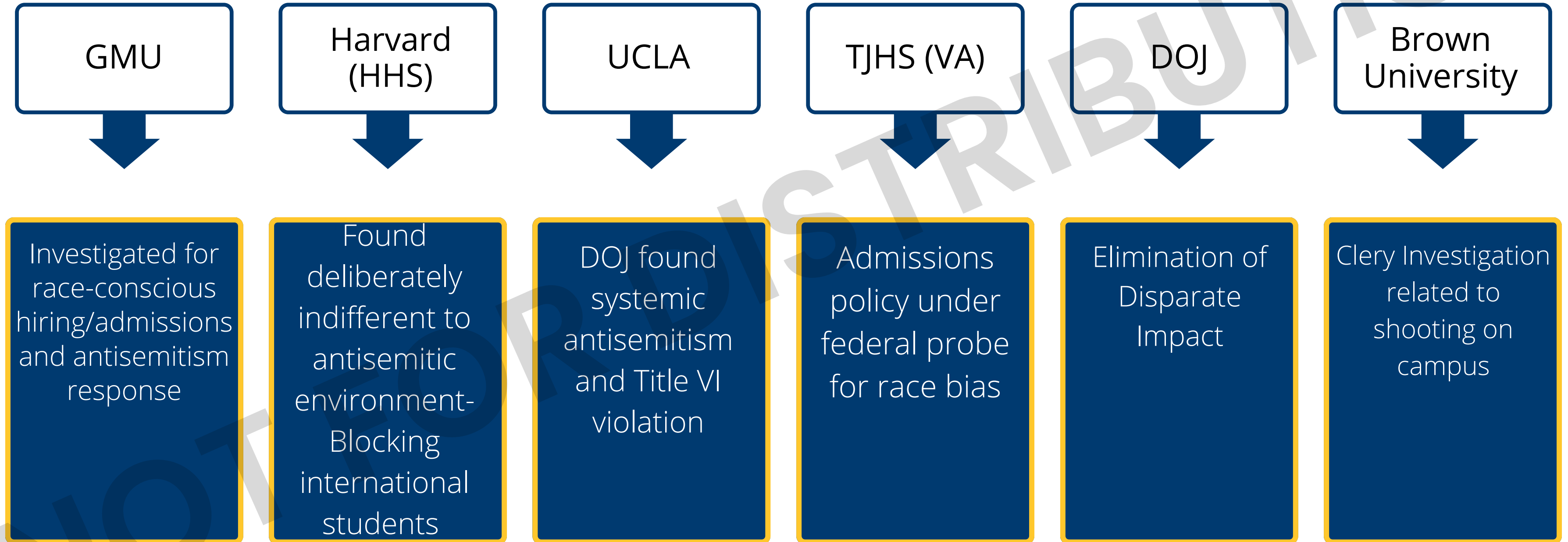
**State
Laws**



**Administrative
Action**



State of Events





COMPLIANCE CUL-DE-SAC

TITLE IX

TITLE VI

ADA



TITLE VII

IDEA/504

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Overview of The Laws



New Message

To ICS Office of Compliance

Subject Complaint

I recently attended an open seminar with Professor Gray on International Conflict. During the talk, Professor Gray sparked discussions that quickly got out of hand and many students were endorsing Hamas and accused Jews of being baby killers. Though Professor Gray didn't make the comments, it was clear that he agreed with this hate speech and allowed it to continue. Due to the severity of these antisemitic comments, I am demanding his removal from the department.

Send



New Message

To ICS District Office

Subject Complaint

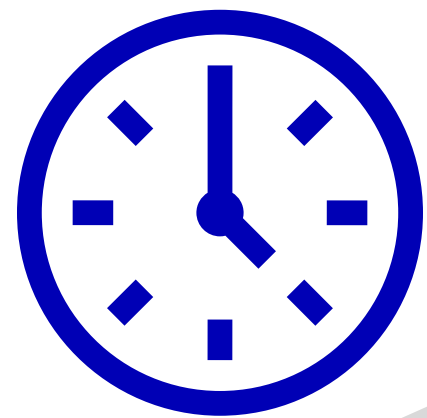
Over the course of this school year, my child has been repeatedly disciplined for alleged “disruptive behavior,” including speaking Spanish with classmates during group activities. I am concerned because I am not aware of similar disciplinary actions being taken against non-Latino students for the same things. My child has felt singled out and uncomfortable participating in class.

Additionally, my child was recently removed from an advanced science class despite meeting all academic eligibility requirements. I was informed that the class might be “too challenging” due to English being my child’s second language. This decision was simply wrong. It was made to hurt my child and keep her from these opportunities.

Send



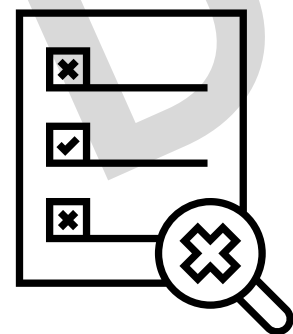
Title VI is Rarely About Intent



Delay



Minimizing Behavior



Inconsistent Responses



**Was this
meant to
Discriminate?**

**What did the
institution do
once it knew – or
should have
known?**

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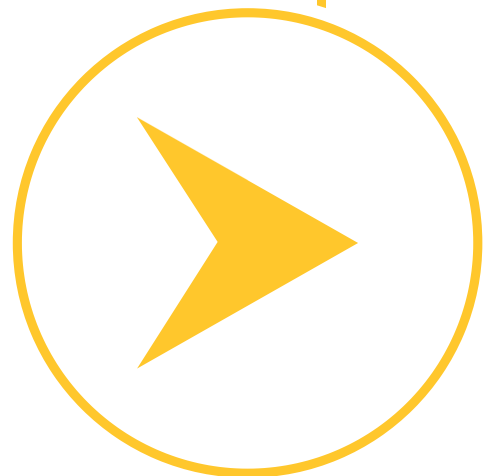
Access



Understanding Discrimination Under Title VI

Title VI of the 1964 Civil Rights Act says,
"No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

42 U.S.C. §2000d



What Activities are Protected Under Title VI?

Programs and activities that receive education funds must operate in a non-discriminatory manner which include:

- Admissions
- Recruitment
- Financial Aid
- Academic Programs
- Counseling and Guidance
- Vocational Education
- Student Treatment and Services

Protected Activities Continued...

Discipline

Student Services

Grading

Recreation

Extracurriculum

Athletics

Housing

Discriminatory Treatment

Harassment/Hostile
Environment



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Harassment creates a hostile environment when the conduct is objectively **offensive and sufficiently severe or pervasive** so as to interfere with or limit an individual's ability to participate in or benefit from a recipient's program.



TITLE VI CASES

OCR determines conduct to create a hostile environment if:

- (1) harassment based on race, color, or national origin existed;
- (2) the recipient had actual or constructive notice of the harassment; and
- (3) the recipient failed to respond adequately to redress the hostile environment.

Brown University Resolution Agreement

Regarding Antisemitism

Facts: The investigation found that the university received around 75 reports of alleged antisemitic, anti-Palestinian, and anti-Muslim harassment against students from October 2023 through late March 2024, including allegations of students pointing at a Jewish classmate's Star of David jewelry and yelling an ethnicity-based insult, a student berating a Palestinian-American roommate about their identity, and students blocking a Jewish classmate from attending a pro-Palestinian rally.

Outcome: OCR concluded that the university did not comply with Title VI by failing to properly investigate whether these and other reported incidents created a hostile environment for students, faculty, or staff under Title VI.

OCR cited to similar agreements reached with Park City, Utah School District and University of Michigan, which included deficiencies in:

1. Record keeping requirements
2. Failing to take timely steps to prevent and address race-based concerns
3. The multiple reports received constituted repeated actual notice of harassment.

Terms of Brown University and University of Michigan OCR Resolution Agreements:

1. Revising policies and procedures to ensure all offices comply with Title VI;
2. Notifying all students, employees, and parents about Title VI prohibitions and protections against discrimination and how to report harassment;
3. Conducting annual training on nondiscrimination and harassment for all students and employees;
4. Consistently maintaining records related to complaints or reports of discrimination under Title VI;
5. Conducting a review of their responses to complaints and taking remedial actions when required;
6. Conducting climate surveys focused on Title VI discrimination for all students and employees; and
7. Analyzing and creating action plans in response to climate surveys focused on Title VI discrimination.

OCR has developed a Shared Ancestry or Ethnic Characteristics website, which can be found here:

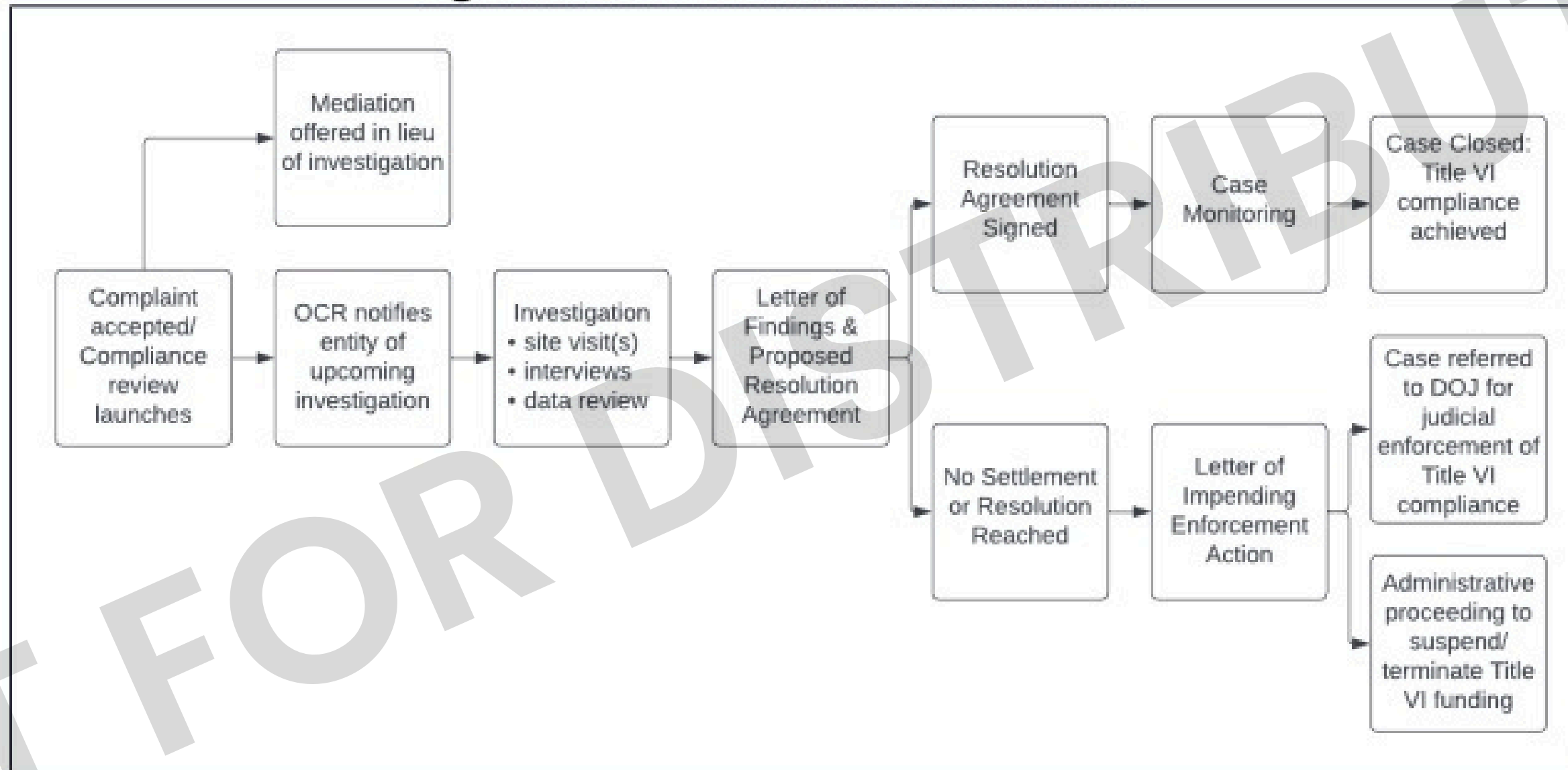


Discrimination Based on Shared Ancestry or Ethnic Characteristics
Find policy guidance, case resolutions, publications, and other resources pertaining to Title VI and discrimination based on shared ancestry or ethnic characteristics.



Figure 1 is a flowchart illustrating the entire OCR enforcement process.

Figure 1. OCR Title VI Enforcement Process



Note: The entity under investigation may request to settle the matter by entering into a Resolution Agreement at any time prior to the conclusion of the investigation.

HYPOTHESIS

Amir, a graduate student of Iranian descent alleges discrimination in his engineering program. He claims that his faculty advisor repeatedly denied approval for required research placements, stating that “students from your background often have difficulty passing federal clearance reviews,” despite the placements not requiring any security clearance. Amir further alleges that other students were approved for comparable placements without delay.



Understanding Title VII

Enforced by EEOC



New Message

To ICS HR

Subject Third Party Complaint form

Dr. Maya Patel, an Assistant Professor who has worked at the college for four years, submits a written complaint to Human Resources alleging multiple workplace concerns. Dr. Patel alleges that her department chair, Dr. Thomas Reed, has treated her differently based on her race, national origin, and sex. Specifically, Maya claims she has experienced the following:

- larger course loads
- negative performance reviews with no specifics
- publications held to higher standards

Send



Title VII Prohibits Employment Discrimination based on:

MENTAL OR PHYSICAL DISABILITY

GENDER IDENTITY

AGE

COLOR

PREGNANCY

SEXUAL ORIENTATION

RELIGION

NATIONAL ORIGIN

SEX

RACE

IMMIGRATION STATUS

VETERAN STATUS



Who is covered by Title VII of the Civil Rights Act?



Private & public sector employers w/15 or more workers

State and local governmental agencies

Employment agencies

Apprenticeship programs

Not Covered: Federal employees or independent contractors. However, federal employees are protected against discrimination by other federal anti-discrimination laws.

What Individuals are Protected from Discrimination Under Title VII?



Applicants



Former Employees



Employees

Title VII Cases:

In July 2026, the U.S. Department of Justice and the EEOC opened formal civil rights investigations into employment practices at the University of California (UC) system, focusing on potential discrimination in hiring, promotion, and other employment decisions based on race and sex, in violation of Title VII.

Kluge v. Brownsburg - Kluge objected on religious grounds to the school's policy requiring teachers to use first names and pronouns for transgender students that reflected the students' gender identity, which he believed conflicted with his sincerely held Christian beliefs. Kluge requested a religious accommodation use that he would address all students by their last names only.

Title VII requires employers to reasonably accommodate an employee's sincerely held religious beliefs unless doing so would impose an undue hardship on the employer's business.

De Minimus v. Substantial Hardship



Understanding Free Speech & Academic Freedom



HYPOTHESIS

A student organization invited a controversial political speaker to campus to discuss immigration policy. During the event, the speaker makes broad, offensive statements about immigrants, causing several students to walk out. Several students filed complaints, stating that the speech was hurtful and made them feel unwelcome on campus.

Separately, during the weeks following the event, a student reports that another student repeatedly approached them outside of class, mocked their accent, told him to “go back where you came from,” and sends multiple derogatory messages through social media despite being asked to stop.



FREE SPEECH OR HARASSMENT

- THE NEED FOR CLEAR POLICIES THAT DISTINGUISH BETWEEN PROTECTED SPEECH AND HARASSMENT.
- CONTEXT AND IMPACT OF PROVOCATIVE SPEECH.
- PROTECTED SPEECH CAN CREATE A HOSTILE ENVIRONMENT IF IT TARGETS INDIVIDUALS BASED ON RACE, ETHNICITY, OR NATIONAL ORIGIN.





Freedom of expression

The fact that harassment may involve conduct that includes speech in a public setting or speech that is also motivated by political or religious beliefs does not relieve a school of its obligation to respond under Title VI- if the harassment creates a hostile environment in school for a student or students.

CAUSES OF LITIGATION IN FREE SPEECH CASES

- FAILING TO RESPOND TO THE IMPACT ON STUDENTS
- TREATING COMPLAINTS AS “POLITICAL DISAGREEMENTS”
- FAILING TO ACT TIMELY



What response is required - even when discipline is not?



Americans with Disabilities Act

*Enforced by the
Department of Justice*

ADA

**AMERICANS WITH
DISABILITIES ACT**



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The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination solely on the basis of disability in employment, public services, and accommodations. The person must otherwise be qualified for the program, service or job.

Discrimination Based on Disability



Section 504

Section 504 of the Rehabilitation Act of 1973 prohibits any school district receiving federal financial assistance from discriminating against disabled children.

Requires Free
Appropriate Public
Education



Title II

Title II of the Americans with Disabilities Act of 1990 expands these protections and prohibits all school districts, whether they receive federal funding or not, from discriminating against disabled children.



Accommodations

The ADA requires the provision of reasonable effective accommodations for eligible faculty, staff, students, and visitors across an institution's programs, activities, and services.

The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity:

Walking

Speaking

Talking

Breathing

Thinking

Hearing



Accommodations

One aim of the ADA was to make educational institutions more accessible.

This aim covers “reasonable accommodations” such as the following:

- Modification of schedules
- Allowing employees to receive written instructions
- Modification of breaks/shifts
- Extra time allotted for breaks/lunch
- Interpreters
- Specialized computer equipment
- Lighting changes
- Extra monitors

INTERACTIVE PROCESS UNDER ADA

REPORT OF A DISABILITY THAT
IMPACTS ABILITY TO PERFORM JOB
OR LIMITS ACCESS TO EDUCATION



MEETING WITH HR OR
ACCESSIBILITY OFFICE TO
CONDUCT INITIAL ASSESSMENT

IS REQUEST REASONABLE?



NEED FOR BRAINSTORMING
ALTERNATIVE ACCOMMODATIONS

IMPLEMENT ACCOMMODATION,
IF REASONABLE



CONTINUE INTERACTIVE PROCESS
UNTIL EXHAUSTED OPTIONS



DOCUMENT!! DOCUMENT!! DOCUMENT!!



CAUSES OF ADA LITIGATION

- **Interactive Process was not documented**
- **The institution stopped too early in the process**
- **Decisions were made *about* the employee instead of *with* the employee**
- **Failure to document**

Recent Case Under the ADA:

Hight v. University of Chicago

- Hight enrolled in the university's medical program and had multiple documented disabilities, including sickle-cell anemia, autoimmune conditions, chronic fatigue, anxiety, major depressive disorder, PTSD, and bipolar disorder.
- During his final year of medical school, he faced disciplinary action and eventual dismissal, in part for alleged unprofessional conduct. Hight asserted that some conduct issues were directly tied to his disability (including side effects of medication).
- He claimed the University failed to appropriately engage in the interactive process and explore accommodations before dismissing him.
- Sued under disability discrimination, failure to accommodate, and breach of contract (Illinois law)



Understanding Title IX

*Enforced by Office for
Civil Rights*

Understanding Discrimination Under Title IX

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”



2020 SEXUAL HARRASMENT



Conduct on the basis of sex that satisfies one or more of the following

- 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;
- 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
- "Sexual Assault," "Dating Violence," "Domestic Violence" or "Stalking" as defined in the Clery Act.



QUID PRO QUO



1. An employee of the school
2. Conditioning the provision of an aid, benefit, or service of the recipient
3. On an individual's participation in unwelcome sexual conduct

HOSTILE ENVIRONMENT HARASSMENT



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

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

SPECIFIC OFFENSES



1. Sexual Assault
 - a. Rape
 - b. Fondling (Criminal Sexual Contact)
 - c. Incest
 - d. Statutory Rape
2. Dating Violence
3. Domestic Violence
4. Stalking

JURISDICTION 2020



Education
Program or
Activity



Locations, events, or circumstances (operations) over which the institution exercised substantial control over both the respondent AND the context in which the sexual harassment occurs.

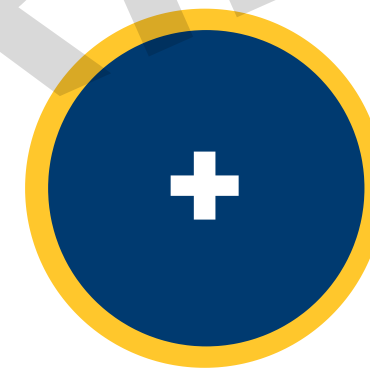


Includes online sexual harassment but it must be analyzed to determine if it occurs in education program or activity.



Does not create or apply a geographic test, does not draw a line between "off campus/property" and "on campus/property," & does not create a distinction between sexual harassment occurring in person vs online.

2020



TITLE IX SEXUAL HARASSMENT

EDUCATION PROGRAM/ACTIVITY

TITLE IX FORMAL GRIEVANCE PROCESS



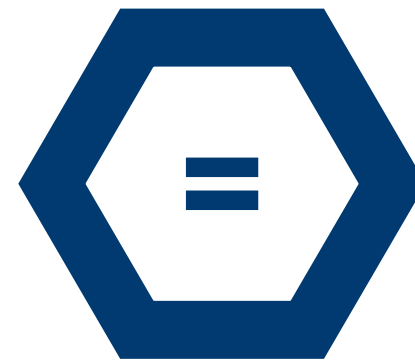
3 BUCKETS



CONTROL OVER RESPONDENT



CONTROL OVER LOCATION / EVENT



TITLE IX

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HYPPO

Ariya, a Freshman at ICS University, filed a complaint after experiencing repeated comments in a residence hall. She alleges that Micah made sexually explicit jokes about women from her India, touched her upper thigh while making moaning sounds, mocked her accent, and stated that “women like you only get admitted because of DEI and sleeping their way through school.” The comments occurred in common areas over several weeks and were reported to a resident advisor, but the student states no corrective action was taken. Ariya is too embarrassed to attend her classes with Micah.

PREGNANCY AND ACCOMMODATIONS



PUMP ACT and PWFA

The PUMP Act expanded workplace protections for lactating employees under the Fair Labor Standards Act (FLSA).

- Requires employers to provide reasonable break time for employees to express breast milk for up to one year after childbirth.
- Employers must provide a private space, other than a bathroom, that is shielded from view and free from intrusion.

The Pregnant Workers Fairness Act requires employers to provide reasonable accommodations for employees affected by pregnancy, childbirth, or related medical conditions, unless doing so would cause undue hardship.

- Applies to employees and applicants, including faculty, staff, and student employees.
- Requires an interactive process similar to the ADA (e.g., modified duties, flexible schedules, temporary reassignment, additional breaks).
- Prohibits forcing employees to take leave if a reasonable accommodation would allow them to continue working.
- Prohibits retaliation for requesting or using pregnancy-related accommodations.
- Common in higher education contexts involving teaching schedules, lab work, clinical placements, and physical job requirements.

Pregnancy Discrimination

Pregnancy + Related Conditions

Title IX Prohibits students and employees from discrimination based on:

- Pregnancy
- False Pregnancy
- Childbirth
- Termination of Pregnancy
- OR recovery therefrom.



REMEMBER

- Must be treated the same as any other temporary disability
- Must be reinstated to the status held when individual began their leave



RECENT UPDATES

- New OCR Resource on Pregnancy Discrimination
- Proposed Rules on Pregnancy Discrimination
- Lingering Questions Post *Bostock*





State Laws!

UNDERSTANDING BIAS



Types of Bias

Affinity Bias

Unconscious bias that causes people to gravitate towards others who appear to be like them



Anchor

Being overly influenced by the first piece of information we receive



Halo

Positive impressions of people, brands, and products in one area positively influence our feelings in another area



Horn

Cognitive bias that causes our negative impression of someone or something in one area to change our impression of them in other areas



Confirmation

Listening to or respecting data that aligns with our viewpoints



Overconfidence

Overly confident in own intelligence, experience or opinions



Let's Get to Work:

- Triage
 - What type of case is this?
 - What are your next steps?
 - Who are the parties?

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Reporting

Madison is a new teacher in the district. You heard from your friend that she is pregnant and asked about taking leave. She meets with HR to ask about taking 6 weeks of leave and also to ask if she can get a sit/stand desk in her room and a stool for her feet due to complications of her pregnancy.

Alicia and Charles are both employees who have been dating. They don't have a reporting relationship to each other but work in the same building. One day, Jamie (the teaching assistant) sent you an email telling you that she saw Alicia slap Charles across the face after he referred to her as a "bitch." She thinks it was nothing since they seem fine now, but wanted to tell someone. You see Charles walking down the hall and ask him if he's ok since you heard about an altercation. Charles laughs and says they were playing around and didn't think anyone saw them.

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Reporting

Jake said Lewis called him a monkey on the bus and asked what part of the jungle his family was from in Africa. Lewis has done this three other times and constantly makes monkey sounds in the gym when he sees Jake.

Cara arrived to her class and found a swastika drawn on her desk. She thinks it may be Lucy doing it because Lucy keeps whispering about how much she hates Jews during class. Cara's parents are outraged and want Lucy suspended immediately.

Kenny has an IEP that allows him to have a paraeducator help him when he gets overwhelmed. Specifically, she is supposed to remove him from the room with a 10-minute break to do breathing exercises and move away from any noises. There is a shortage of teachers at the school, so Kenny's main teacher allows him to leave class when he needs to do so. She also asked Kenny to sit away from the noise to help him not be so overwhelmed.

CONDUCTING INVESTIGATIONS AND THE CHALLENGES

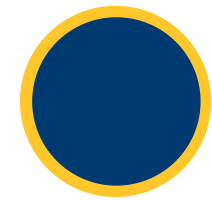




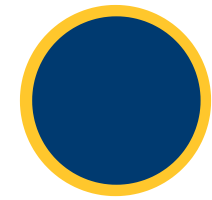
**What is the hardest part
about investigating?**

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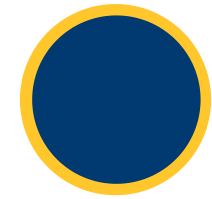
ICS SPECIALIST RESPONSES



Pace of the investigation.



Getting a party up to speed on a complicated policy and federal statutes .



Remaining neutral and not forming opinions in the beginning stages of the investigation.



It's difficult watching the process take a toll on people; it can be stressful for all parties.



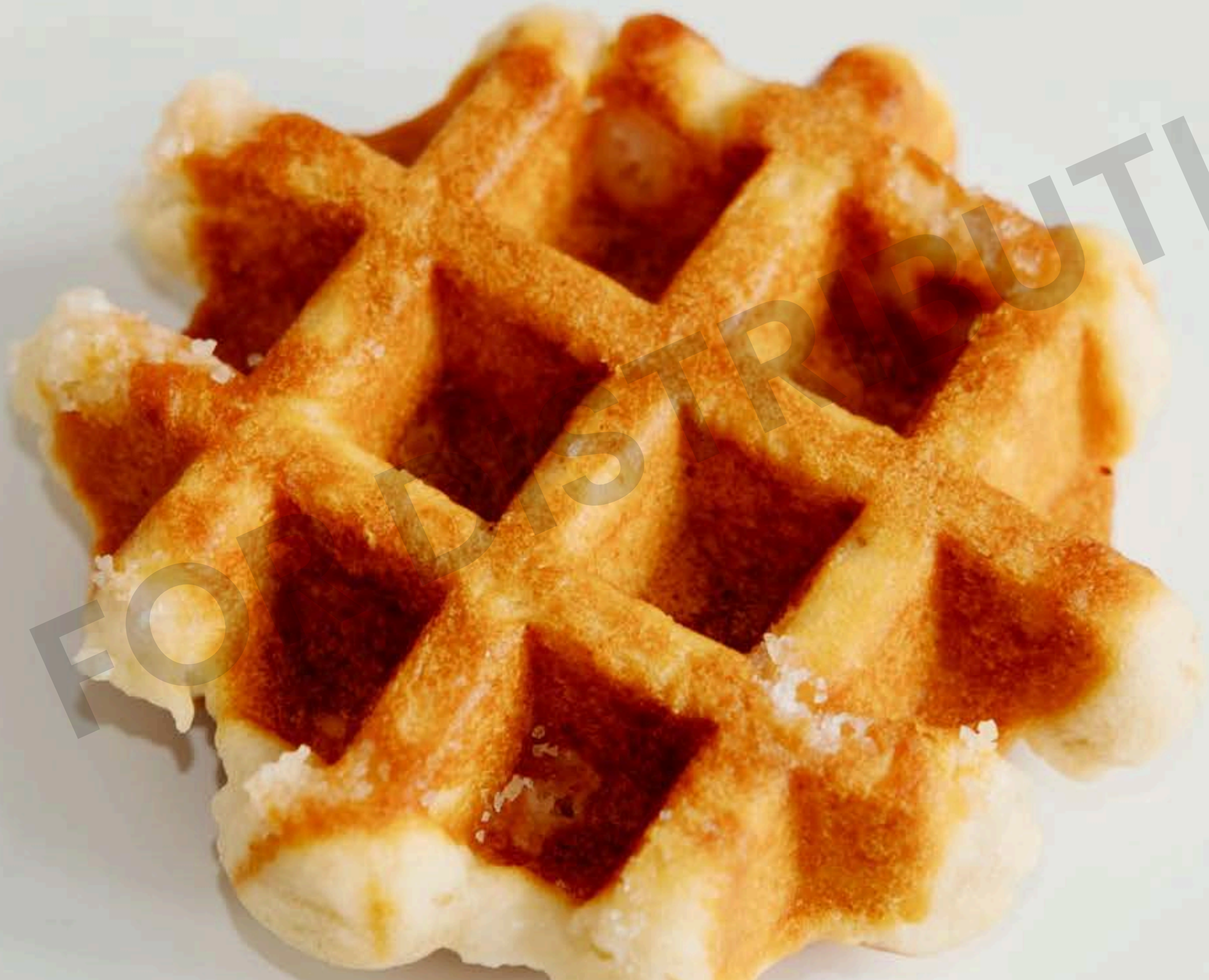
Knowing the right questions to ask and how to clearly disseminate the information collected into a good report.



NOT

ION





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Dr. Maya Patel, an Assistant Professor who has worked at the college for four years, submits a written complaint to Human Resources alleging multiple workplace concerns.

Retaliation (Potential Title VII Issue) - Dr. Patel states that after she informally raised concerns to the Dean about unequal workload distribution by her Department Chair:

- She received her first negative annual performance evaluation.
- She claims the Dean had issues with her from her initial hire due to her relationship with the old Dean.
- Her student surveys have been mediocre, but she believes it was due to her Chair assigning her to the earliest morning classes. She has a medical condition and takes medication that causes her to be groggy for a few hours in the morning.
- Her request for conference travel funding was denied without explanation.
- Dr. Reed allegedly warned her to “be careful about making waves before tenure review.”

Part 1:

Before You Start...

The importance of preparation



TITLE IX
UNIVERSITY

PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

What's Your Elevator Speech?

- Thanks
- Resources
- Response



What are you investigating?

Title IX

Title VI

Title VII

**Code of
Conduct**

Other?

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Internal Handbooks and Expectations



**Student Handbook/
Code of Conduct**



**Faculty Handbook/
Code of Conduct**

- Union Agreement?



**Staff & Employee
Handbook/
Code of Conduct**

**What
information
do you have?**

**Is there anything you
need before you meet with
parties and/or witnesses?**

Developing a Plan



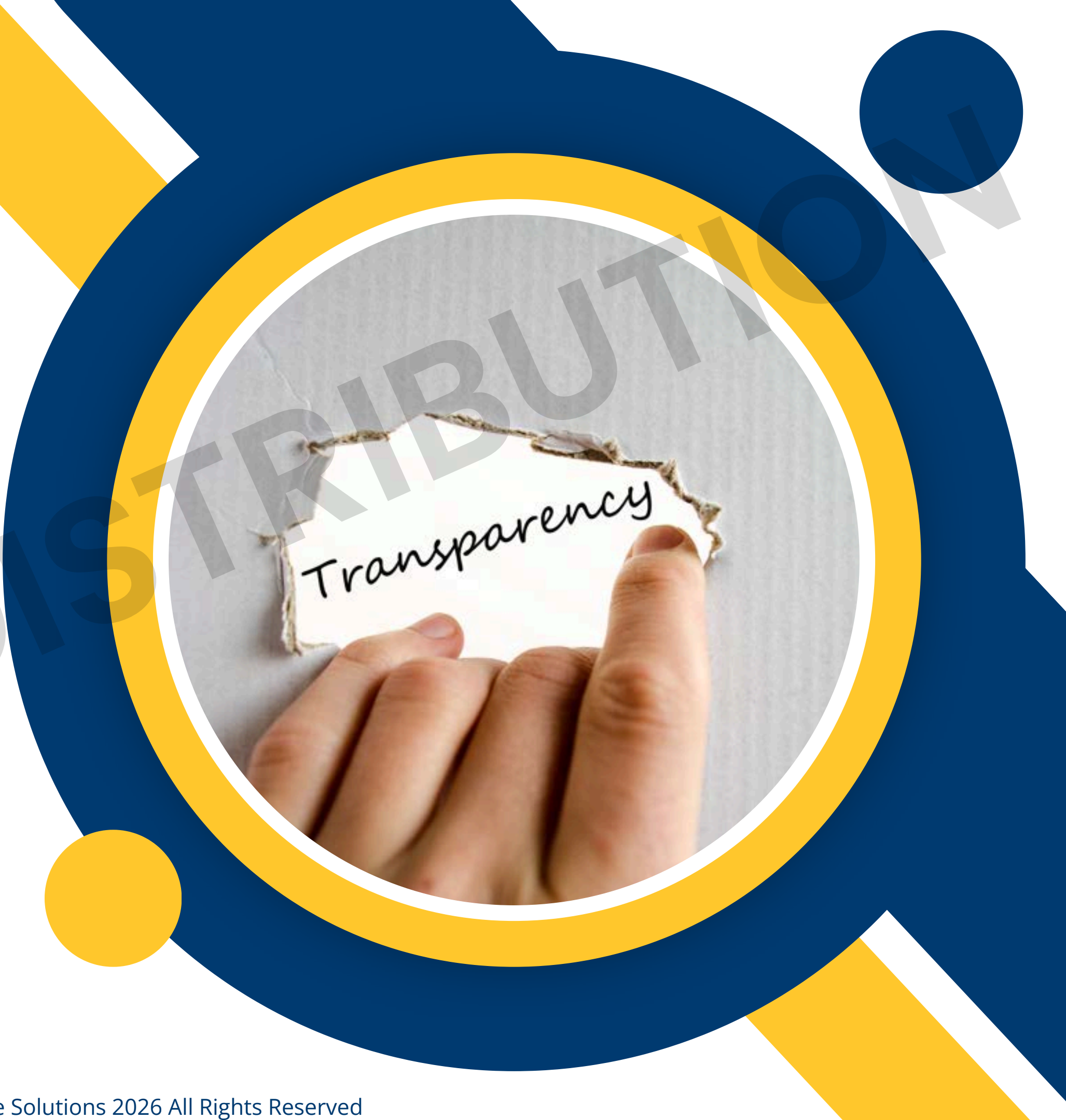
Part 2:

Opening the Meeting...

The importance of transparency



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You Only Get ONE First Impression

Before they “walk in” either in person or virtually,
CHECK YOURSELF

- Start with a clean slate.
- Refresh your mind with names and dates
- Practice neutrality
- Prepare the room

**Remember:
neutrality is a
discipline, not
a character
trait**

**You practice neutrality
by:**

- 1. Checking your facial
reactions**
- 2. Slowing down your
conclusions**
- 3. Letting facts ruin
your favorite theory**

FIGHT, FLIGHT, FREEZE, OR FAWN OR ALL FOUR...

OR SOMETHING COMPLETELY DIFFERENT...





REMINDER: BODY LANGUAGE & FACIAL EXPRESSIONS

- Virtually and in person

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Check Your Biases



Where are your potential biases in the case?



Can you overcome any biases that exist?



Is your mind in a neutral position?

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INTRODUCTION

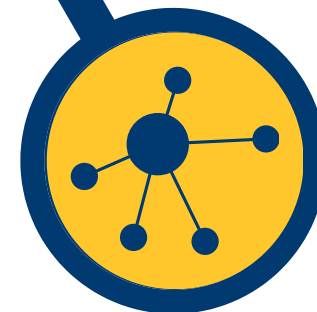
Who are you?



What is your responsibility?



What policy/policies & procedures are you using?



Something to connect you with the party or witness

Part 3:

Asking Questions

The importance of gaining clarity

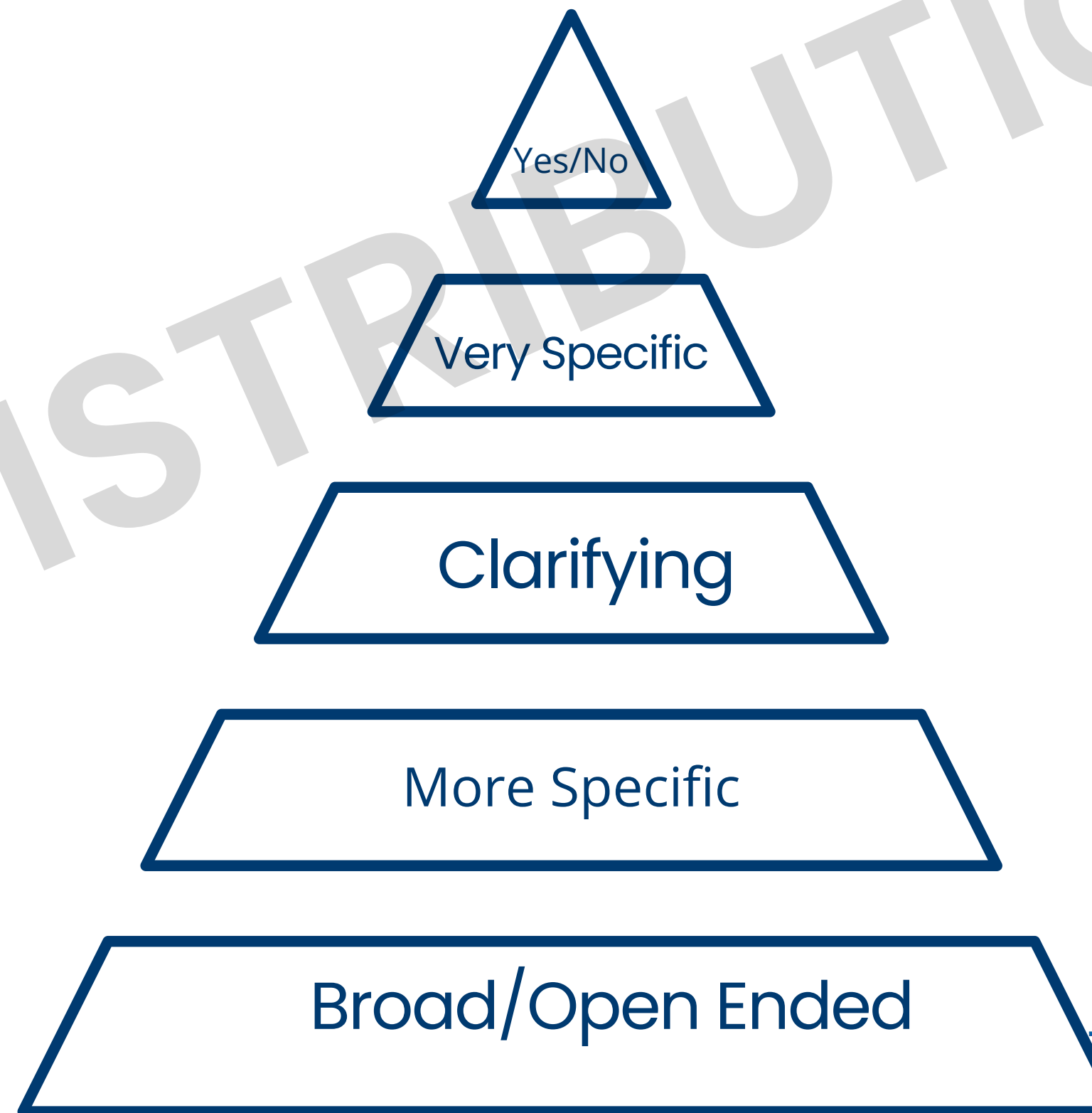
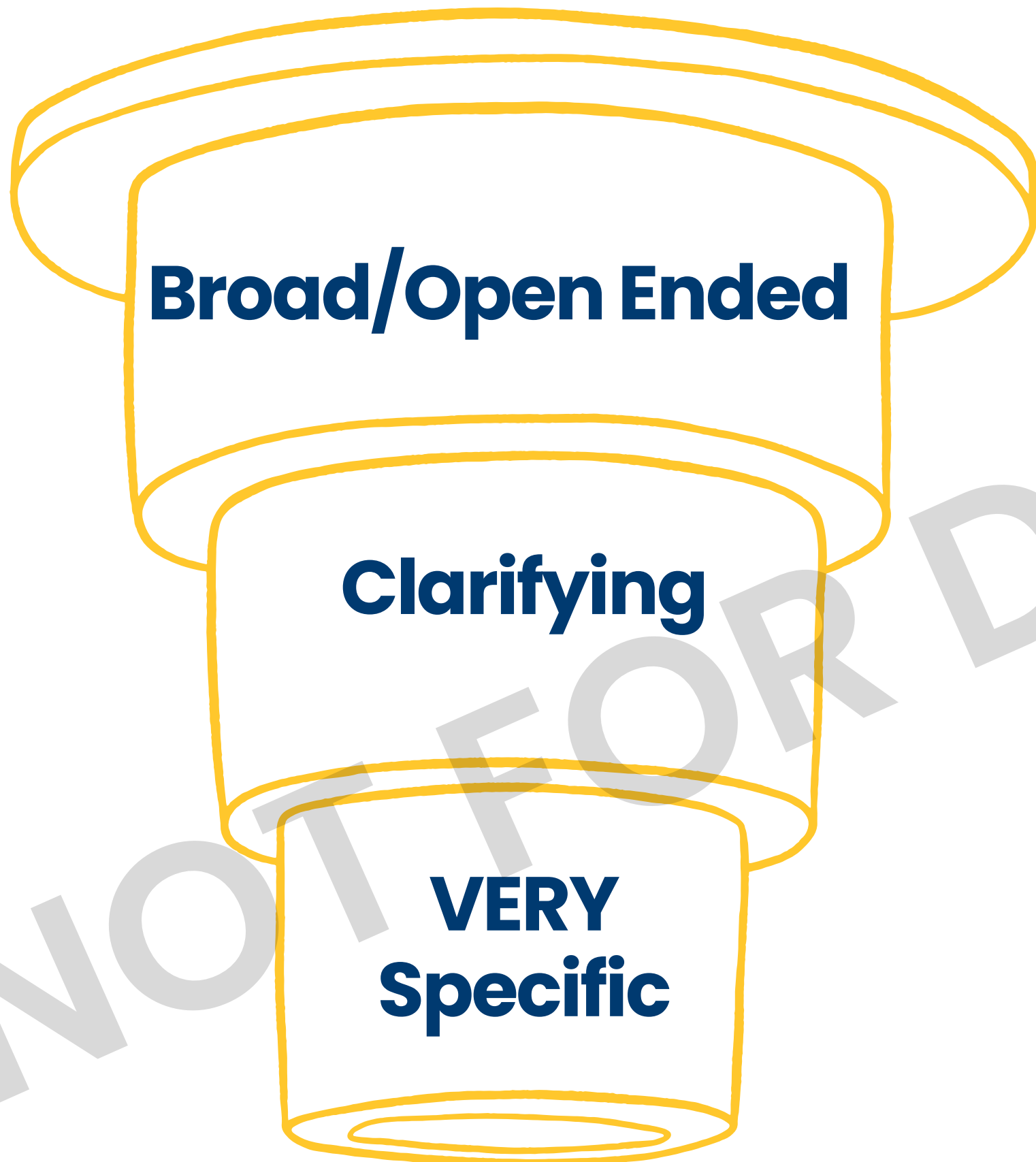
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Funnel Method v. Pyramid Method



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- What happened?
- How do you know about it?
- How did it happen?
- Who did it happen to?
- How do you know these parties?
- Who else was there?
- When did it happen?
- Where did it happen?
- **Why** -- without saying WHY

The **NEED** to know questions

The Formula for Questioning

Kindness

+

Transparency

+

Patience

Note-Taking

- Detailed, but not so much that it slows down the interview
- Decide what is most important
- Extra person in the room?
 - Give notice and explain their role as note-taker
- Note taker vs. dual investigator
- Use quotations if possible
- Ask for a pause or clarification if necessary



Part 4:

Gathering Evidence...

The importance of curiosity

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Types of Evidence

- **Comparator Witnesses**
- **Performance Reviews**
- **Personnel File**
- **Zoom Recordings**
- **Portals for grades**

Social Media



Burden

The burden on you to **ASK** for information. The burden is **NOT** on the party or witness to “offer it.”

 Do you have any phone or texts?

 Was anything shared on social?

 Did you email about this?

 Who does your manager treat differently?



Independent Investigative Actions

Think outside the box



Make the phone call



Find the witness



Visit the location



Google the term



Take the photo



Email Follow Up

Thank you



Any response or information needed from party

What was discussed



Opportunity to clarify

Next steps



Reminder about supportive measures

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- **Clean up notes**
- **Save notes**
- **Save evidence collected**
- **Create to do list**
 - **Witnesses to connect with**
 - **Evidence to collect**
 - **Follow up meetings to schedule**

Documentation

Sustainability Planning

If you were unable to continue with the investigation starting tomorrow, would the person picking up the file know what had been done and what is left to do?

Part 5:

Identifying & Interviewing Witnesses...

The importance of understanding relationships



Challenging Witnesses / Parties

The “Hulk”



The Rabbit Chaser

The “Turtle”



The Big Reveal



The Reluctant Participant

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Who are your witnesses and who identified them?

Witnesses identified by the Complainant



Witnesses identified by the Respondent



Witnesses identified by you



Witnesses identified by other witnesses



MOST IMPORTANT QUESTIONS

- HOW DO YOU KNOW THE COMPLAINANT?
- HOW DO YOU KNOW THE RESPONDENT?
- HOW DO YOU KNOW THE OTHER WITNESSES?

How long?

In what capacity?

Describe your relationship with them.





****CREDIBILITY/CONSISTENCY****

Report Writing...

The importance of your audience



YOUR REPORT SHOULD:

-  **ASSUME THE READER WILL READ IT UNDER PRESSURE AND WITHOUT CONTEXT**
-  **ANTICIPATE QUESTIONS**
-  **EXPLAIN YOUR JUDGMENT CALLS**
-  **MAKE YOUR REASONING CLEAR**

Organization



Easy to Follow, Clear, Concise

Can the reader follow the report and understand who reported/said what?



Roadmap for the Decision-Maker

This report will guide the decision maker, help them ask questions, and provide a roadmap for their process



Includes the Basics

Assume the reader knows NOTHING



Reviewed by Colleague

Trusted counterpart



Consistent but Not Identical

There is room for a little flexibility

Who is your audience?



Judge



Student/Employee

The ART of Summarizing

- What is important?
- What is relevant?
- What is outside the scope?
- What needs to be quoted?

Organization is Key

By party/witness?

By time/chronological?

By event?



Helpful Considerations

- Page numbers
- Footnotes?
- Timeline(s)
 - Investigation
 - Events
- Appendix/Attachments WITH PAGE NUMBERS
 - Table of Contents for appendix/attachments

Delivery of the Report...

The importance of
support



THE DELIVERY OF THE REPORT CAN BE TRAUMATIC



**Witnesses may say things that
are surprising to the parties**



**Changing the trajectory of
individual's lives**

CONSIDERATIONS

- ▶ **WHAT IS THE BEST WAY TO DELIVER THE REPORT**
- ▶ **ARE THERE SUPPORT RESOURCES IMMEDIATELY AVAILABLE**
- ▶ **DO YOU NEED TO PROVIDE A HEADS UP THAT IT IS COMING**
- ▶ **NEXT STEPS**
- ▶ **APPEAL OPTIONS**

WRAP AROUND SUPPORT

1.
INTAKE

2.
INVESTIGATION
&
REPORT

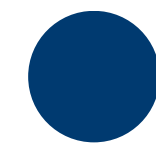
3.
POST
RESOLUTION

4.
FOLLOW UP
&
CHECK IN

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Sustaining Compliance



Trainings

- Quarterly at most
- Use their time wisely
- Establish those relationships for reporting



Communication

- Updates from legal and outside entities
- Shared information internally



Community

- Importance of reporting and transparency
- Build a culture of openness
- Regular evaluation of school climate and practices



What are the “Hot Spots”?

- Specific issue within the district or institution
- Rising number of complaints in certain area
- Review if complaints occur during noticeable times
- Employee issues higher under certain managers

Compliance + Compassion

People who feel dismissed:

- Escalate
- Lawyer up
- Go public

Compassion does not weaken compliance - it strengthens credibility, cooperation, and outcomes.

- Impact > Intent

NEXT STEPS FOR SCHOOLS

- Appoint or confirm Title VI Coordinator
- Review and update nondiscrimination policies and grievance procedures
- Ensure accessible reporting mechanisms
- Audit complaint responses and disciplinary processes
- Train! Train! Train!



Whew!

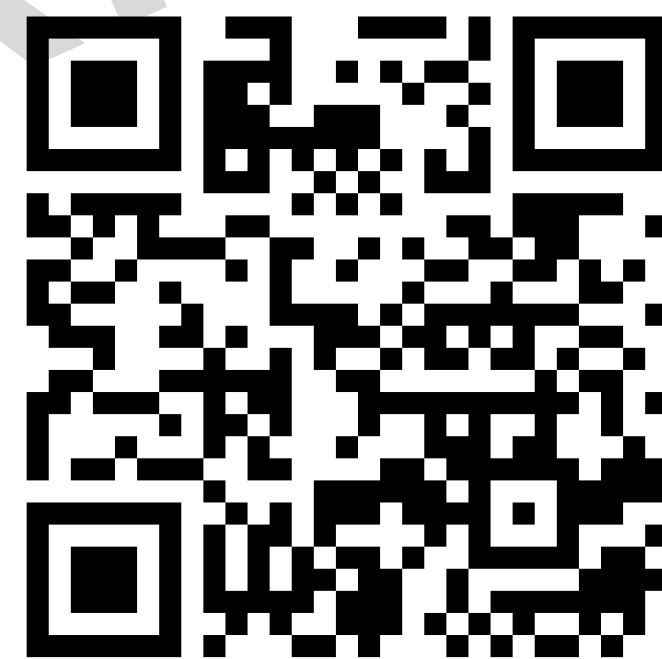
That's a wrap!

**THANK
YOU!**

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Help Us Help You



**Please fill out
the survey.**

