



**New College Florida**

**Title IX Assessment**

**Observations and Recommendations**

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## **INTRODUCTION**

The New College Florida (hereinafter “NCF”) retained TNG to conduct an assessment of the Title IX operations at the university, and to provide recommendations for best practices.<sup>1</sup> The examination of several cases, as well as the review of policies, the Title IX website and other documents, along with the extensive interviews conducted with faculty, students and staff involved with Title IX enabled me to develop an in-depth understanding of the processes involving Title IX at NCF. The observations and recommendations reflected in this report apply to the entire Title IX process and how it intersects with student and employee conduct.

The goal of this assessment is to identify challenges based on my review and to suggest best practice recommendations that may be considered by NCF going forward to improve the campus implementation of Title IX for all individuals involved.

The recommendation in this document reflects current best practices and the regulatory standards established in the 2020 Title IX regulations. There will be new Title IX regulations projected to be published in May 2023 which may necessitate revision of the NCF policy as well as some of the best practices recommendations. This report will be updated at that time.

A part of my charge in conducting this assessment was to provide recommendations for best practice considerations that would support the Title IX operation to continue to serve NCF not only through industry standards and best practices currently in place, but also to recommend additional considerations for best practices to further enhance a system of excellence for the campus.

## **METHODOLOGY**

The TNG assessment protocol provided an understanding of the Title IX process from the point at which a student would make an initial allegation of sex/gender misconduct against a member of the NCF community through the final resolution of the matter. This assessment did not include a review of all recent cases, only a select few that posed significant challenges.

### **I. POLICY REVIEW**

#### **Observations and Recommendations**

There are significant issues with the policy language in Policy 3-4018 Sexual Discrimination/Harassment that make the policy inconsistent with current Title IX regulations and case law. I was unable to provide a red-line review of the policy because it was only available in PDF format, but I created a hand-written editing of the policy with editorial comments handwritten in if the College wishes to use this. Since the new regulations are scheduled to be published in May with final implementation on the campus by August or

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<sup>1</sup> *Best practice recommendations are those recommendations that may be above and beyond what is required by established System policy, state law or federal regulations*

September, I recommend that the College continue to operate under the current policy language until **the Title IX regulations are published and that a new policy should be developed** and published quickly after the publication of the regulations to reflect these new federal requirements.

The Student Code of Conduct has an extensive provision regarding sexual misconduct and confusingly references the Title IX procedures as the resolution source for violations of this section of the Policy. This unnecessary duplication of prohibited conduct is both confusing and unnecessary. Title IX is a non-discrimination law that not only covers discriminatory actions, but also sex-based harassment and all other forms of sexual misconduct. Therefore, all types of prohibited conduct on the basis of sex should be encompassed in the Title IX-based policy. The Title IX-based policy should be applicable to students, faculty and staff at NCF. The Student Code of Conduct and any Human Resources policies should reference sex-based conduct to be addressed under the Title IX-based policy. I am attaching my written edits of the Student Code of Conduct as well. **This document is in serious need of revision and updating.**

Since Title IX is a federal discrimination law that applies to all educational entities that are federal funding recipients, only the institution itself, not individuals, can be held responsible for violating Title IX law. Therefore, the NCF policy should not suggest that an individual is in violation of Title IX, rather an individual may be alleged to violate the NCF policy that reflects the Title IX regulatory standards and Florida state law. I recommend this policy be titled, New College Florida “Policy on Sexual Harassment, Discrimination and Sexual Misconduct”. This policy would encompass all elements required to comply with Title IX and the State of Florida regulations and would encompass all student and employee misconduct on the basis of sex.

## **II. ORGANIZATION**

### **Observations and Recommendations**

The current Title IX operation at NCF is problematic. Comments shared from individuals interviewed included, “Title IX is a mess and has been for years”, “Title IX is broken”, and “Title IX is set up for failure”. I agree that Title IX is in need of a significant re-framing. Currently the office is staffed by a single individual (who has multiple other assigned responsibilities), no support staff and no budget. This is an unacceptable risk for the college.

The Title IX Office has seen multiple staff turnovers and multiple and varying supervisors<sup>2</sup> and supervisory structures over the past decade, leaving the status of the office confusing for the NCF community and resulting in a lack of trust or confidence in the Title IX operation. As a result of the organizational chaos, information provided to the campus has been spotty and

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<sup>2</sup> *The Title IX Coordinator has had three different supervisors in seven months and has been moved from the Compliance Office to Student Affairs.*

often out of date, resulting in individuals not knowing how or where to file a grievance or complaint or where to seek supportive measures.

- \* Some important considerations for the Title IX Coordinator role include:
  - The Title IX Coordinator must have the requisite independence to assure compliance with legal and regulatory mandates for sex/gender equity and other civil rights laws if assigned to this role.
  - The Title IX Coordinator should operate free from conflicts of interest and have a designated independent and trained Deputy Coordinator to serve when their own recusal is necessary.
  - The Title IX Coordinator should have a well-detailed job description that more clearly and specifically outlines the range of responsibilities assigned for this role.
  - While the title of “coordinator” is often inconsistent with the significance of the role that individual performs at an institution, this title has remained a regulatory standard for the individual providing oversight of the functions of the Title IX regulations since 1975. The recent trend in the past five years has been to incorporate Title IX compliance with other civil rights laws for faculty, staff and students under the supervision of the Title IX Coordinator. Therefore, any shift in office name should reflect the broader compliance responsibilities of the individual who oversees that office while maintaining the title of Title IX Coordinator.

The Title IX operation at an institution should be independent of other community specific organizational operations (such as one only focusing on students, or one only focusing on employees) in order to avoid a limited perception of the scope of the office. Title IX applies to all members of the NCF community and thus, should not be viewed as only providing support and accountability to one segment of the community. The placement of the Title IX Office requires a critical analysis of the NCF overall organizational structure in order to determine the most appropriate placement for this function. Additionally, the Department of Education’s Office of Civil Rights encourages the Title IX Officer to either answer to the institutional President or a Senior Vice President and to have a direct or dotted line to the President in order to provide appropriate notice to the President of high profile or significant cases in a timely manner.

As stated previously, the national trend is to have the Title IX function a part of an overall civil rights harassment/discrimination operation that would provide oversight and compliance with all state and federal civil rights laws. This would include Title VI (race, national origin and ethnicity), Title VII (sex, race, color, religion, national origin for employees) and 504/ADA (disability), in addition to Title IX. Combining all civil rights-based operations in a single office creates both consistency and efficiency in addressing all civil rights issues.

To more effectively position the Title IX Office to establish autonomy with the campus community to serve all members of the community without confusion I suggest consideration of the following options.<sup>3</sup> Each of these considerations would provide the Title IX/Compliance Office role of answering to a senior administrative official. However, the Title IX Coordinator should also have a non-supervisory dotted line to the President of the College for purposes of accountability.<sup>4</sup>

The placement of the Title IX Office should establish a clear identity for the office and the role of the Title IX Coordinator as a compliance-based position. The following represents considerations for placement of the Title IX operation, combined with other civil rights compliance-based offices at NCF:

1. Currently the Title IX Office is a part of the Student Affairs Division. There are disadvantages of the Title IX Office being located in the Student Affairs Division in that the Title IX function is a compliance-based office that serves faculty, staff and students, unlike most other student affairs programs and operations that only serve students. The presence of the Title IX Office as a part of other student-based offices and programs suggests an exclusivity of serving students only and tends to inhibit employee complaints. The Title IX operation could benefit from a re-framing of the office with more emphasis on serving the entire NCF community. While some institutions place the Title IX Office in the Student Affairs Division, this placement requires substantial additional marketing, training and re-framing in order to encourage employees to view the Title IX/Compliance operations as relating to them in their role at the College.

2. Placement of the Title IX/Compliance Office could be part of the overall Compliance Office function at NCF which is also a common placement for a civil rights compliance function. There are significant limitations to this placement at NCF however that would need to be considered. **First, NCF's Compliance Office does not address discipline matters or grievances, rather that office serves as the College internal auditor to oversee compliance with financial matters. Additionally, the Director of this Office is only a part-time employee and does not have the knowledge or training required to oversee a grievance-based operation.**

3. Creation of a Civil Rights Compliance Division in the Office of Human Resources that addresses grievances related to all the federal and state civil rights laws that impact both

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<sup>3</sup> A "best practice" is not a singular element, rather a best practice represents moving the delivery of service from the industry standard, and often from current excellent practices to ones that may further enhance the delivery of service to the community.

<sup>4</sup> The Office of Civil Rights strongly suggests a "stand alone" office for the Title IX Coordinator. Ideally, the Title IX Office, as a part of the university's compliance office with all forms of harassment, discrimination and retaliation based on protected status should maintain a high-profile position answering to a senior administrative officer, with a dotted line to the president that would allow the Title IX Coordinator to bypass their direct supervisor on urgent/significant Title IX matters and address them directly to the President.

employees and students (Title IX, Title VI, Title VII, 504/ADA). This would place that Civil Rights Compliance division, including Title IX, under the direct supervision of the Chief Human Resources Officer. This placement would affiliate the Title IX function with a compliance-based operation that serves the entire campus in addressing civil rights complaints. This office would be managed by the Title IX Coordinator under the supervision of the Chief Human Resource Officer. This also would enable the head of the TitleIX/Compliance Office to oversee Title IX as well as other discrimination, harassment and retaliation issues, and provide staffing in that office to address all forms of discrimination and harassment for employees and students.

4. Placement as a part of the Office of Legal Affairs. Affiliation with the Legal Affairs Office would provide appropriate status of this office as representing legal standards related to federal and state laws regarding compliance with harassment and discrimination. **The disadvantage to this placement would be that there would need to be a separation of the Title IX/Compliance functions from the attorney oversight in order to avoid conflicting out legal counsel from representing the College if the legal counsel were to be involved in oversight or decision-making in a case involving a civil rights claim.**

Some additional considerations for the Title IX office include:

- \* The Title IX Coordinator must have significant authority and contact with academic and administrative departments. <sup>5</sup>
- \* All publications related to Title IX, as well as the website and training operation, should incorporate and reflect a focus on discrimination, harassment and retaliation for all protected classes. This will further support the NCF community's understanding of civil rights compliance and the Title IX Office as the source to report all forms of discriminatory conduct.
- \* Visibility and accessibility of the Title IX Office and staff are continuing important best practices. It is important to continue to focus on visibility, autonomy, and the broad mission of the office.
- \* In addition to the Title IX Coordinator's oversight of all harassment and discrimination allegations and Title IX compliance, the Title IX Coordinator would oversee the adjudication process for all civil rights grievances to ensure timeliness of the process.

Staffing considerations for the Title IX/Compliance Office should include:

- \* The Title IX Coordinator, who should also be trained to conduct investigations when needed. However, when this is done, there must be another trained Title IX administrator

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<sup>5</sup> See Appendix A for a list of Title IX Coordinator responsibilities as identified by the Office of Civil Rights and recommended by ATIXA (the Association for Title IX Administrators)

(generally the Title IX Deputy) designated to oversee the process and review and approve the investigation report.

- \* **Appointment of a Deputy Coordinator to conduct thorough, reliable and impartial investigations for Title IX grievances as well as grievances that arise under Title VI, Title VII and 504/ADA and serve as the Title IX Coordinator designee as needed.**
  - The Deputy Coordinator must be well trained in all elements of Title IX .
  - The Deputy Coordinator serving to conduct investigations should be trained on the content necessary to assure the professionalism of the civil rights investigator role.
- \* An administrative assistant to maintain the operational elements of the office.
- \* **Additionally, NCF should designate and provide for a sufficient number of individuals to serve as Hearing Officers/Decision Makers for both original decisions as well as for appeals.**
  - These individuals must be trained regarding College policy and on the skills essential for making determinations regarding policy violations, sanctioning and appeals.
  - The Hearing Officers/Decision Makers should act with independence, impartiality and without conflict of interest.
- \* **Internal appointment of Title IX departmental liaisons in the following areas: Student Affairs, Academic Affairs, Human Resources and Athletics to serve as a part of a Title IX team.** These individuals should serve in this role in addition to their regular positions.
  - The designated liaisons in these critical areas can serve Title IX to represent perspectives from their constituencies as a part of the Title IX team and as an important link to the Title IX program.
  - This broad representation throughout the campus also contributes to expanding the visibility of Title IX.
  - Designated departmental liaisons are generally not compensated for serving in this role unless they also provide additional services such as investigators or serve as a designee in the absence of the Title IX Coordinator, nor should it be a time-consuming obligation requiring additional compensation.
- \* Recruitment and training of individuals within the College to serve as Advisers for parties who are bringing an allegation of a violation and for those individuals accused of violating Title IX or other civil rights policies. Typically, serving as an adviser is incorporated into a faculty member or administrative staff member's job description and would not require additional compensation.

- \* NCF must allocate a sufficient budget to employ a qualified Title IX Coordinator, Deputy Coordinator and support staff.
  - The budget should provide sufficient funding to support office functions and for retaining outside investigators or decision-makers when cases necessitate a third-party involvement for these roles.
  - The budget should include funding sufficient to meet federal, state and local obligations for compliance with NCF policies, Title IX and other civil rights laws as required.
  - The budget should include sufficient funding for all individuals involved with the Title IX resolution process to receive ongoing professional development training on an annual basis as required by VAWA, Sec. 304.
  
- \* The campus law enforcement for NCF is composed of sworn officers<sup>6</sup>. This creates both benefits and challenges. The benefits are that the campus is protected by sworn officers with arrest authority. These individuals, however, are also employed by NCF and serve as employees of the College. The challenge to having sworn law enforcement officers serving as the campus public safety is that there are frequently conflicts with their obligations as sworn officers and their role as a campus employee. The obligation to uphold state law regarding their position as sworn law enforcement will prevail over their College role when there is a conflict. **Therefore, at NCF, the campus law enforcement may not serve as investigators for campus-related misconduct issues that may also have criminal law implications.** In fact, campus law enforcement may be involved in an investigation of a campus-based misconduct such as assault at the same time the college is conducting their own internal administrative investigation of the same matter. The campus law enforcement operation may not share information with the College other than that information consistent with state public records laws, and the College should not share any information with campus law enforcement that is FERPA protected information because information held by sworn law enforcement offices for law enforcement purposes is not protected by FERPA. Thus, the College would be exposing private information of students.
  - \* The College should develop a Memorandum of Understanding with their police force on campus to clearly outline the boundaries of information and how and under what circumstances it should be shared.<sup>7</sup>
  - \* The Campus law enforcement unit should be trained in Clery compliance and should oversee all Clery requirements including providing Timely Warning Notices, Emergency

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<sup>6</sup> Officers sworn by the State of Florida and bound by the laws of the state for law enforcement, as well as subject to state public records laws.

<sup>7</sup> ATIXA has model MOU's available for the College to review to adapt for their needs.



Notifications, Missing Student Notifications, Fire Safety Notifications, availability of Crime Logs, Campus Security Authority training, and publication of the Annual Security Report.

- Clery training for campus law enforcement is essential. The campus law enforcement unit should maintain a webpage of all required Clery information, including links to the prior three years Annual Security Reports.

### **III. TRAINING**

#### **Observations and Recommendations**

**The Title IX operation at NCF has a substantial training deficit for those individuals involved with providing the oversight of Title IX, including for Coordinator, Investigators and Hearing Officers/Decision Makers.** Title IX regulations requires that the Title IX Coordinator and others performing Title IX functions must have adequate training in order to stay up-to-date with legal compliance development and best practice trends. Additionally, VAWA Sec. 304<sup>8</sup>, requires annual training for all employees involved with the Title IX operation, including the Coordinator and Deputy, hearing officers/decision makers, investigators, appeals officers, advisers and, if applicable, departmental liaisons.

#### **Internal Training (for NCF community)**

- \* Title IX regulatory changes, anticipated in May 2023, will necessitate campus-wide training for all new and Title IX affiliated staff to update them on the new regulatory changes. Additionally, there is required training that must be provided internal to the College. While Title IX law requires that all individuals receive sufficient training in order to perform their functions within the Title IX operation, VAWA 304, which is part of the Clery Act has legal requirements for training. These legal requirements include:
  - **Mandatory training for all incoming students and new employees** on topics including, but not limited to: College policies and procedures, mandatory reporting, reporting/notice options, on and off-campus resources, interim actions, remedies, resolution options, the investigation process, and the appeals process as well as addressing dating/domestic violence, sexual assault and stalking (required by VAWA 304).
  - **Annual training offered for all students** that is topically based, interactive and engaging to encourage their confidence in the Title IX Office and increase their knowledge of Title

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<sup>8</sup> Although there is no private right of action under Clery, a violation of any element of the Clery Act, including VAWA 304 could result in Clery a Clery review and resultant fines of \$62,689.00 for each violation of the Act.

IX-based policies and the accompanying procedures, where and how to report.  
(required by VAWA 304)

- Annual training for all individuals involved with any aspect of the Title IX operation, including the Title IX Coordinator, Deputy Coordinators, Investigators, Decision Makers, Appeal Officers and Advisers. (required by VAWA 304)
- **Regular annual training to all appropriate employees on sexual harassment and information regarding their mandatory reporting responsibilities**, including reporting under Title IX, child abuse reporting statutes, and VAWA. (Required by the EEOC)
- Special, targeted training on Title IX policies, reporting and documentation procedures, and appropriate responses for supervisors, chaperones, faculty and other employees involved in non-campus-based programming such as study abroad, internships, externships, field trips, and service trips. (Recommended by Title IX regulations)
- Training to law enforcement, safety, and security officials on topics including, but not limited to: applicable Title IX policies and procedures, reporting procedures, the role of the Title IX Coordinator, and the intersection of criminal and campus investigations and resolution processes. (Recommended by VAWA 304 and Title IX)
- **Training for the College Board, President and Cabinet on essential information regarding Title IX and other civil rights law compliance.** (Recommended by Title IX)

#### **IV. WEBSITE**

##### **Observations and Recommendations**

The NCF website for Title IX provides minimal and adequate information when you can find it. In order to find information about Title IX reporting, policies and resources you must first go to the section for students, then to Safety and Conduct, then to the link to Title IX from that page.

##### **It takes substantial searching to even find the web page with Title IX information on it.**

The Home page for NCF has a list of resources, including how to order textbooks and career information, but there is no Home page link to Title IX. An individual who was sexually assaulted is not likely to go searching through multiple web pages to find where to obtain assistance and/or make a report. The following elements must be considered for inclusion to provide greater transparency and ease of accessing information about the Title IX Office in order to more effectively serve the NCF faculty, staff and students.

- \* There should be a prominent link to the Title IX Office and resources on the Home page for the College.

- \* The web site on the NCF page and the Title IX web page should be factually accurate and easy to navigate.
  - There should be multiple “key-words” that would direct an individual to resources provided by the Title IX Office in addition to “Title IX” as the key word.
  - The College should utilize student focus groups to discuss the Title IX website, access to information on the site, suggestions for key words for ease of access.
  - It’s important to make use of hyper-linked information for resources for ease of access to information.
- \* There must be a link to the most up-to-date policy on the Title IX website. Currently there is not a link to the Policy on the Title IX website.
- \* The Title IX non-discrimination statement must be posted prominently on the Title IX web page.
- \* The Title IX web page should identify the name, location and contact information of the Title IX Coordinator as well as how to make an emergency report after standard business hours.
- \* The Title IX webpage should have a section addressing the need for immediate support and assistance as well as how to make a non-emergency report (there is currently an on-line reporting function which is great).
- \* The Title IX web page should have appropriate information for students, faculty, staff and parents regarding:
  - Where to report and how to address emergencies (utilize hyper-link to resources)
    - Putting in the words “rape” or “sexual assault” in the search bar takes you to articles and organizations in the top 3 items on the link, but not to the Title IX Office.
  - Access to mental health and medical support on and off campus (hyper-link to these resources).
  - Where to make a complaint.
  - The rights of parties.
  - How to make a 3<sup>rd</sup> party report. A 3<sup>rd</sup> party report is any report made by someone who is neither the victim or the accused and could include someone from outside the NCF community.
  - Confidential reporting sources.
  - On-campus and off-campus (local) resources.

- Available supportive measures.

## V. PREVENTION INITIATIVES

### Observations and Recommendations

- \* NCF should allocate sufficient annual funding for primary prevention, awareness programming and educational efforts as required by Title IX regulations, VAWA 304 and other federal, state and local mandates. This also serves as a significant risk management initiative. This function may be a part of the Title IX Office or made available through a Counseling or Wellness services if they provide other forms of wellness training. In either case, the Title IX Coordinator should have substantial knowledge about and involvement in the planning and execution of all prevention efforts related to sex/gender misconduct and discrimination. Recommendations for prevention programming that incorporates risk management goals includes:
  - Programming efforts should include information about the Policy and grievance process as well as consent and healthy relationships; programs, initiatives and strategies for addressing intimate partner violence, sexual assault, sexual harassment, sex/gender discrimination and stalking.
  - Programming should also include safe and positive bystander intervention techniques and options and information on risk reduction.
  - Programming should be culturally relevant and tailored to fit within the cultural beliefs and practices of multiple audiences or the specific targeted group as well as community norms.
  - Programming should be provided through multiple modalities including outside speakers, in-house presenters on specific topics, community gatherings, awareness campaigns, information on social media sites and student organizations.
  - The Title IX Office should host periodic focus group discussions for students and employees on “rights” of parties, supportive measures, how to report, discussion of process, what do students need/want to know.
- \* A Best Practice would be for NCF to provide sufficient funding for victim advocacy services, or coordinate provisions for, or arranges for local access to advocacy services for students and employees. In cases where external services are provided, the College should implement an MOU to clearly articulate the boundaries and expectations of both the advocate and the College.
- \* NCF should consider creating a brochure or prominent link on the website that provides comprehensive information on the non-discrimination policies at the College, procedures, supportive measures and accommodations.

- \* Providing comprehensive prevention programming should be a high priority at NCF and should be supported from the highest levels of the College.
- \* The Title IX Office should represent a “safe space” for reporting and will only achieve this goal by being transparent, welcoming, and visible.

## **VI. TIMELINESS**

### **Observations and Recommendations**

**A common issue gleaned from the multiple interviews is that the process takes too long for resolution**, during which time the parties are further traumatized by the lack of information and length of time. The Title IX Coordinator may alleviate some of the anxiety of the parties through intentional communication to the parties of the current status of the adjudication process, and to engage in ongoing communication with the parties to keep them informed of progress and timing.

- \* A best practice recommendation for ensuring all the steps of the process are followed in a timely way would be to create a Checklist for each of the elements through the process which would be used by the Title IX Coordinator and Investigator to maintain documentation of the progression of a case and documentation of the timing of each step to be entered into Maxient, which would also be beneficial when auditing the process for timeliness to determine where delays may exist.

## APPENDIX A

### BEST PRACTICES RECOMMENDATIONS FOR THE TITLE IX COORDINATOR ROLE

A best practice is for the Title IX Coordinator to have broad responsibility for oversight and accountability of the entire process from the initial report through the final determination of a case. The Title IX Coordinator responsibilities should include:

- \* Oversight of TIX compliance;
- \* Supervision of staff and process;
- \* Oversight of training and education;
- \* Involvement with Policy development (since this is a system provided policy, the campus Title IX Coordinators should provide input and be appropriately trained);
- \* Development and implementation of grievance procedures (again, this is established by the system, but management and implementation of the procedures must be coordinated by the Title IX Coordinator for the campus);
- \* Oversight of the case management process;
- \* Recruitment and training of campus advisors (those who will serve to advise either the Complainant or Respondent)
- \* Provision of appropriate notice to the parties throughout the process, including the finding, the appeal and any actions that follow the Title IX process;
- \* Ensure Complainant is informed of actions throughout the process and ensure that all determinations (findings) include remedial considerations for the Complainant
- \* Maintain accurate and thorough records and notes;
- \* Serve as the key intake officer for notice, allegations, reports and formal complaints;
- \* Conduct the initial assessment of a case to determine if it falls under Title IX or another policy;
- \* Coordinate overlap of various student and employee grievance processes
- \* Ensure promptness and effectiveness of grievance procedures;
- \* Supervise investigations;
- \* Review all investigation reports to ensure they are thorough, reliable and impartial;
- \* Oversee informal resolution procedures
- \* Inform key stakeholders as appropriate through the investigation and adjudication process;
- \* Provide quarterly statistical update to the President (see attached example) update the President in a timely manner on all high profile or significant cases;
- \* Maintain up to date knowledge of federal TIX laws and state laws related to Title IX;
- \* Navigate First Amendment issues involving expression and discrimination
- \* Engage in involvement with campus prevention agenda;

- \* Provide 504/ADA compliance, including appeals of accommodations and grievance related to harassment or discrimination (Note: this is not the disability services role, which should be a separate function under a different administrator)
- \* Ensure compliance with final sanctions and remedies
- \* Serve as the primary contact for government inquiries on Title IX/DHR matters