



Welcome to the 2026 ICUT Title IX Conference

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EDUCATION &
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Title IX & Campus Civil Rights in 2026

Day One — One Case, All the Way Through

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Day One at a glance

1	Framing the current landscape	9:05
2	Beyond Title IX: one framework for all civil rights work	9:30
3	Intake & the first 72 hours — the case begins	10:45
4	Guided peer discussion	11:45
5	Investigations that hold up — the case continues	1:15
6	Hearings, determinations & resolution — the case decided	2:15
7	Responsible use of AI in campus civil-rights work	3:45

OUR METHOD

We follow one hypothetical — Ana & Jordan — through intake, investigation, and hearing. At each stage:

- What the law requires
- The practical judgment calls
- How to do it well

How we'll work today

- One running hypothetical. *Ana Reyes and Jordan Blake — a single Title IX matter we carry from the first report to a final determination.*
- Three questions at every stage. *What does the law require? What are the hard judgment calls? How do we do it well?*
- You do the thinking. *Frequent Questions slides and short discussions — the facts are built to make reasonable people disagree.*
- The skills transfer. *What works for Title IX intake, investigation, and hearings works for Title VI, disability, and employee matters too.*

Ground rule: Speak in hypotheticals. Share the shape of a problem — never identifying details of a real, live matter.

1

FRAMING THE CURRENT LANDSCAPE

The ground has shifted

Broader, more operational, and more interconnected than it was five years ago.

Three shifts that changed the job

Broader

Sex-based conduct is one piece. Race and national origin, disability, age, and employee matters land on the same desks.

More operational

The work is systems and logistics — intake, routing, documentation, records — as much as legal judgment.

More interconnected

One incident rarely fits one silo. Facts cross Title IX, Title VI, disability, employment, and retaliation at once.

The through-line: Risk today comes less from one wrong legal call than from an incoherent process across offices. Ask of every decision: would this look reasonable, and documented, a year from now?

Where the Title IX rules stand right now

2020 Rule

- The 2020 regulations govern today. *Built on Davis and Gebser: actual knowledge + a response that is not deliberately indifferent.*
- The 2024 rule was vacated nationwide. *A federal court vacated it on January 9, 2025; it is not in effect in any jurisdiction.*
- New rulemaking is on the 2026 agenda.
- Confirm your own policy reflects the 2020 rule. *Many institutions reverted after the 2024 rule fell — make sure the reversion is complete.*

Bottom line: Build today's process on the 2020 framework and watch for the next rule.

The 2026 enforcement climate

Title IX rule

2020 rule governs; new rulemaking pending. Respondent due-process suits remain a real risk.

Supreme Court

Watch developments on transgender-athlete participation and on employment law applications.

State legislation

Growing state activity on antisemitism and Title VI nondiscrimination.

Title VI focus

Heightened federal attention to shared-ancestry harassment (incl. antisemitism) and race-conscious programs.

Process & records

Investigations increasingly turn on whether your process and documentation were sound — not just the outcome.

Backlog & scrutiny

A large OCR case backlog means matters can surface long after the events (and perhaps with a new administration).

2

BEYOND TITLE IX

One framework for all civil rights work

Different statutes, one compliance architecture — and the same skills we'll practice today.

The big idea for this session

- Every civil-rights statute shares one compliance spine. *Notice, assessment, interim support, a fair investigation, a reasoned decision, remedies, and no retaliation.*
- The differences are in the dials, not the architecture. *Definitions, covered parties, specific procedures, and timelines vary — the backbone does not.*
- So the Title IX skills you'll practice today transfer. *Scoping, evidence preservation, neutral interviewing, credibility, fair process, and documentation work everywhere.*

Watch for this all day: Every time we do something well on the Ana & Jordan case, ask — where else on my campus does this exact skill apply?

The frameworks that share your desk

Title IX

Sex discrimination in education programs and activities.

Title VI

Race, color, national origin — including shared-ancestry harassment (e.g., antisemitism, Islamophobia).

Section 504 / ADA

Disability discrimination, access, and reasonable modifications — including within your process.

Title VII

Employment discrimination and harassment involving staff and faculty.

Retaliation

Prohibited across every statute — and often the claim that outlives the original one.

First Amendment

At public institutions, speech and academic-freedom limits on how you regulate conduct. Private institutions may adopt First Amendment principles by policy.

One front door: Same intake, different legal engines. Spotting which engine is running is the first skill — and it's the same skill for all of them.

The universal compliance spine

One backbone for every civil-rights matter — master it once. Running through every step: nondiscrimination, no retaliation, and documentation.

1

Policy & training

The foundation for everything that follows — a clear policy and trained people who know their roles.

2

Notice & intake

Someone with authority learns of possible discrimination; you receive, support, and record.

3

Assess & scope

Jurisdiction and which framework(s) apply; is there a hostile environment or adverse action?

4

Interim / supportive measures

Protect access and safety now — independent of any finding.

5

Investigate

Neutral fact-finding; burden on the institution; equal opportunity; objective evaluation.

6

Decide & remedy

A reasoned decision under the right standard; remedies that restore access; appeal.

The transferable skills we'll practice today

Scoping & jurisdiction

Deciding what's in, what's out, and which policy governs.

Trauma-informed intake

A first conversation that supports, informs, and preserves the record.

Evidence preservation

Holds, forensics, chain of custody — before anything disappears.

Neutral interviewing

Open-ended, non-leading fact-finding that holds up.

Disciplined credibility

Articulable factors, not demeanor or status.

Fair process & records

Notice, opportunity to respond, reasoned decisions, clean files.

The payoff: You are not learning six processes. You are learning one — and applying it across every civil-rights matter you touch.

But mind the differences — don't over-generalize

What stays the same

- The compliance spine and the core skills
- Duty to respond to known discrimination
- Supportive/interim measures and no retaliation
- Neutral, documented, reasoned process
- The need for campus collaboration across offices
- Related threshold issues (e.g., potential Clery implications)

What changes by statute

- Definitions and legal standards (e.g., hostile-environment tests)
- Who is covered and who decides
- Specific procedures — Title IX requires a live hearing with advisor cross-examination
- Timelines, notice rules, and appeal rights

Rule of thumb: Borrow the architecture and the skills freely; confirm the specific standard and procedure for the statute in front of you.

Same skills, a shared-ancestry matter

- A Jewish student reports a pattern of harassment tied to national origin — slurs in a group chat, exclusion from a study group, and a defaced dorm door.
- No sexual component, so it is not Title IX — but it is squarely Title VI (shared ancestry).
- **Watch the spine engage: notice → assess (hostile environment?) → supportive measures → neutral investigation → reasoned decision → remedy.**

Discussion: Which offices own this on your campus, and would the intake feel any different than a Title IX report?

Make it concrete for your campus

- 1 Where do civil-rights matters currently fall between offices — and who patches the gap?
- 2 Do Title IX, Title VI, disability, and HR use a common intake and record, or separate ones — and is the path clear to the people who need to report?
- 3 If the same skills work across all of them, what would a single, coherent response system look like?

PAIR & SEARCH

Can a real person actually find your reporting path?

THE SETUP

Fresh eyes on a familiar site. The point of the day is a coherent, findable response system — this tests whether yours actually is, from the outside.

HOW TO RUN IT

- Pair with someone from a different institution.
- On your phone or laptop, go to your partner's public website and try to report — as a scared student would, with no insider knowledge.
- Time it: how many clicks to a name, a form, or a phone number? Is it obvious who's confidential and who must report?
- Now switch. Then each of you names the single fix that would help most.

Timing & format: 10 minutes · pairs across institutions, then report-out

Which engine is running?

THE SETUP

Three quick fact patterns across three statutes. The point lands when tables see the response architecture is the same each time.

HOW TO RUN IT

- Each table gets three short reports — one clearly Title IX, one Title VI, one an employee matter.
- For each: name the framework, the first supportive measure, and who owns it.
- Then identify what is identical across all three.
- Report out the one thing that's the same everywhere.

Timing & format: 6 minutes · tables of 5–6, then report-out

3

INTAKE & THE FIRST 72 HOURS

The case begins

Meet Ana and Jordan. From the first report, what does the law require — and what would you do?

The report

- **Ana Reyes, a sophomore, comes to her RA, Sam, visibly upset.**
- About two weeks ago, Ana says, Jordan Blake — a junior on the club lacrosse team — had sex with her without consent in a bedroom during a party at an off-campus house that several lacrosse players rent.
- Both had been drinking. Ana says she told Jordan to stop.
- Ana and Jordan are in the same organic chemistry lab; Jordan lives in the residence hall next to hers. Ana has skipped lab twice and is anxious about running into him.
- Sam, the RA, is designated in the institution's policy as a reporting (non-confidential) employee.

Discussion: Before any law — what is your very first move, and why?

QUESTIONS

First instincts

1 Who needs to know about this report, and how fast?

2 What do you say to Ana in the first five minutes?

3 What must you NOT do yet?

Did this trigger the institution's duty?

§ 106.30 · § 106.44

- Actual knowledge. *Notice to the Title IX Coordinator or an official with authority to take corrective action triggers the response obligation.*
- The Coordinator must respond promptly. *Contact Ana, discuss supportive measures, explain the process and the option to file a formal complaint.*
- Response must not be deliberately indifferent. *Davis / Gebser: the standard is a response that is not clearly unreasonable in light of known circumstances.*

Practical: The single most common early error is delay. Once a reporting employee knows, the institution knows — move.

Best practice — the first conversation with Ana

- ✓ Lead with care: “Thank you for coming in. I understand this may not be easy.” Explain who you are and your role.
- ✓ Say which hat you wear: confidential vs. reporting — before she shares details.
- ✓ Put her in control: she decides how much to share today; supportive measures are available now, with or without a complaint.
- ✓ Explain options plainly: a report, a formal complaint, informal resolution, or none — her choice.
- ✓ Explain the ban on retaliation and how to report it.
- ✓ Take neutral, factual notes in her words. Do not investigate or test her account.
- ✓ Provide the information in more than one format — spoken and written — so she can revisit it later.
- ✓ Confirm next steps and exactly how to reach you.
- ✓ Follow up afterward in a way that is safe for her.

The respondent's first conversation matters just as much

- Lead with fairness and the presumption of non-responsibility. *“No decisions have been made. This is not a hearing.”*
- Normalize the emotions without taking sides. *Anxiety and defensiveness are common; acknowledge them, stay neutral.*
- Explain the process, advisor rights, and supportive measures. *Respondents get supportive measures too; each party has an advisor.*
- Reinforce the no-retaliation rule and how to reach you. *Set expectations of mutual respect and clear communication.*

Why it matters: Fair treatment of the respondent from minute one is both the right thing and the institution's best defense later.

The jurisdiction question

- The assault allegedly happened at an off-campus house that lacrosse players rent.
- **Key fact: players may live there only with the coach's permission, which can be revoked for behavior — even lateness or bad grades.**
- The team also has player rules layered on top of the student code of conduct.

Discussion: Is this in the institution's “education program or activity”? What facts decide it?

Brown v. Arizona

9th Cir. Sep. 25, 2023 — substantial control over off-campus housing

“The University and football program allowed [the player] and his teammates to live off campus only with the permission of their coaches... permission to live off campus was conditioned on good behavior and could be revoked. The very existence of this off-campus players' residence was therefore subject to the coaches' control.”

- “Substantial control” over the context can exist even off campus — here, through team rules and revocable permission.
- Our hypo is built on these facts: coach-controlled housing plus player rules likely bring it within the program or activity.

Why it matters: Scope is a fact question. Don't reflexively say “off-campus = not ours.” Look for control over the person and the setting.

Supportive measures — now, not later

§ 106.30 · § 106.44

- Individualized, no-fee, non-disciplinary, non-punitive. *Designed to restore or preserve equal access and protect safety; must not unreasonably burden the other party.*
- Available with or without a formal complaint. *They are decoupled from filing — offer them as soon as you have notice.*
- For Ana: *Lab section change, a mutual no-contact directive, housing options, academic flexibility, counseling referral.*
- For Jordan: *Measures are available to the respondent too; they cannot function as discipline before a finding.*

Document it: Record what was offered, accepted, and declined — and revisit as needs change.

The hard judgment calls at intake

- 1 Ana asks you to “keep this between us.” How do you respond?
- 2 A teammate emails you “Ana is lying — here are screenshots.” What do you do with that now?
- 3 Jordan's parent calls demanding to know what's happening. What can you say?

Best practices — intake, in one screen

- ✓ Move fast on safety and supportive measures; they never wait for the jurisdiction question.
- ✓ Say which hat you wear before details are shared; never promise confidentiality you can't keep.
- ✓ Scope carefully — look for control over the person and the setting, even off campus.
- ✓ Explain options without pressure; the choice to file is the complainant's (with the Coordinator's backstop).
- ✓ Document contemporaneously: what was reported, offered, accepted, declined, and decided — with the reasons.
- ✓ Treat the respondent fairly from minute one.

To file, or not to file?

- Ana isn't sure she wants a formal complaint. She wants the anxiety to stop and to feel safe in lab.
- She's worried about retaliation from Jordan's teammates.
- **The Coordinator notes she can provide supportive measures now regardless — and that the Coordinator may sign a formal complaint even if Ana does not.**

Discussion: Would you sign a complaint over Ana's hesitation? What factors drive that call?

5

INVESTIGATIONS THAT HOLD UP

The case continues

Ana filed. Now the record won't cooperate — and the law sets the rules of the road.

What we now know

- Ana files a formal complaint. An investigation opens.
- After the incident, Ana and Jordan exchanged texts — a few look friendly (“had fun,” a meme). There were also Snapchat messages that have since auto-deleted.
- A teammate, Chris, says he saw Ana and Jordan go upstairs together and that Ana “seemed fine.”
- **Jordan says it was consensual and points to the friendly texts. Ana says she sent them out of fear and to keep things normal.**

Discussion: What are the first three things you do now that an investigation is open?

What the law requires of the investigation

§ 106.45

- Burden on the institution. *The school — not the parties — gathers evidence and carries the burden of proof.*
- Objective evaluation of all relevant evidence. *Inculpatory and exculpatory alike; credibility never turns on a party's status.*
- Equal opportunity. *Both parties may identify witnesses and evidence, and inspect and respond to it.*
- Evidence review, then report. *Send the evidence directly related to the allegations; 10 days to respond; investigative report at least 10 days before any hearing.*

Presumption: The respondent is presumed not responsible until a determination is made at the end of the process.

Scope first: the allegation matrix

- State each allegation precisely — who, what, when, where. *Ana's allegation: non-consensual intercourse at the team house on the night in question.*
- Map each policy element to the facts you must find. *For each element (e.g., non-consent), list the evidence that would prove or disprove it.*
- Revisit scope whenever new facts emerge. *If the texts or Snapchats open new issues, update the matrix — don't let it creep silently.*
- Check for conflicts and bias before assignments are final. *Investigator, decision-maker, and appeal officer must be free of conflict and separate from one another.*

Why it matters: A clear scope prevents both mission creep and missed issues — the two ways investigations lose the thread.

The vanishing evidence

- The Snapchat messages auto-delete. The friendly texts live on both phones. Chris posted a story that night that may still exist.
- Every hour, potential evidence is disappearing.

Discussion: What do you do in the next 24 hours to keep the footprints from vanishing?

Best practice — securing digital evidence

- ✓ Request to turn off auto-delete and disappearing-message settings (Snapchat, WhatsApp) for relevant accounts.
- ✓ Try to go as native as possible as opposed to screenshots (timestamps, device IDs). Screenshots are better than nothing.
- ✓ Capture context, not just content: save surrounding threads and profiles to authenticate and defeat “out of context” claims.

Interviewing that holds up

- Open with rapport and rationale. *“Some of these questions are personal; I ask because I want to understand what happened in your words.”*
- Lead with open-ended invitations. *“Tell me what you remember, starting wherever you like.” Open prompts yield more accurate detail than closed drills.*
- Use sensory and peripheral cues; avoid “why.” *“What could you hear?” elicits memory; “why did you...” implies blame.*
- Sequence: context → core event → clarifications → checks. *Verify accuracy by reviewing the summary with the witness.*
- Frame sensitive topics procedurally and neutrally. *Avoid clothing/consent stereotypes unless directly evidence-linked.*

Credibility — done with discipline

- Assess with articulable factors, not demeanor or status. *Consistency, corroboration, plausibility, specificity, and motive — never a person's role as complainant or respondent.*
- Delay is not proof. *Delayed reporting is common and has many causes; explore it neutrally.*
- Intoxication complicates consent and memory. *Address it with facts and timeline, not assumptions about either party.*
- Distinguish core from peripheral inconsistency. *A wobble on a side detail is not a wobble on the central account.*

Document the weighing: Tie each credibility call to specific evidence — “the timestamp contradicts the alibi,” not “she seemed credible.”

Investigation judgment calls

- 1 Chris now says he “doesn't want to get involved.” How do you proceed without a key witness?
- 2 Mid-investigation, Ana's advisor sends you new screenshots. How do you authenticate and incorporate them?
- 3 Jordan's attorney-advisor insists on controlling his interview. What ground rules do you set?

The evidence review and the report

§ 106.45(b)(5)

- Share the evidence directly related to the allegations. *Both parties and advisors get to inspect it — including exculpatory evidence you may not rely on.*
- Give a real chance to respond. *At least 10 days for written responses before the report is finalized.*
- Write a report that fairly summarizes relevant evidence. *Neutral, chronological, evidence-cited; send it at least 10 days before the hearing.*
- Hold findings unless your policy assigns them here.

Best practices — investigation, in one screen

- ✓ Scope precisely and revisit it as facts emerge; map every element to the evidence you need.
- ✓ Preserve digital evidence ASAP.
- ✓ Interview open-ended and neutral; verify summaries with witnesses.
- ✓ Give both parties the evidence and a real chance to respond before you finalize.
- ✓ Write a neutral, evidence-cited report.

6

HEARINGS, DETERMINATIONS & RESOLUTION

The case decided

Ana's matter reaches a hearing. Relevance calls, credibility, a written determination — and a close question.

At the hearing

- The matter proceeds to a live hearing before a trained decision-maker.
- Jordan's advisor wants to cross-examine Ana about (a) the friendly texts, (b) a prior sexual relationship with a different student, and (c) how much she drank.
- Chris — the teammate — declines to attend the hearing at all.
- **The decision-maker must rule on relevance in real time, weigh credibility, and write a determination.**

Discussion: Which of those three cross-examination topics come in — and which don't?

What the law requires at the hearing

§ 106.45(b)(6)

- A live hearing with advisor cross-examination. *Each party's advisor questions the other party and witnesses directly, orally, in real time — never the parties personally.*
- The institution provides an advisor if a party has none. *No party should be left unable to cross-examine.*
- The decision-maker is separate from the investigator. *And rules on the relevance of each question before it is answered.*
- Only relevant, permissible questions proceed. *Relevance is the gate; the decision-maker must explain any exclusion.*

Separation of function: Investigator, decision-maker, and appeal officer are three different people. No one wears two hats.

Ruling on relevance — the questions in Ana's case

Work each proposed question through the gate. Explain each ruling on the record.

1

The friendly texts (a)

Relevant. They bear on consent and credibility and come in — weight is for deliberation, not the gate.

2

Prior sexual behavior (b)

Generally NOT relevant. Questions about a complainant's prior sexual behavior are excluded, subject to two narrow exceptions.

3

How much she drank (c)

Relevant. Intoxication bears on capacity, consent, and memory — it comes in.

The two exceptions (b): Prior sexual behavior comes in only to prove someone else is the source of the conduct, or as specific incidents with the respondent offered to prove consent.

Determinations that hold up

§ 106.45(b)(7)

- Pick a standard and apply it consistently. *Preponderance or clear-and-convincing — and the same standard for all complaints, including those against employees.*
- Show the analysis. *Allegations, procedural steps, findings of fact, and the rationale for each conclusion.*
- Tie facts to findings. *Explain how the evidence supports each conclusion — especially in a close case like Ana's.*
- State remedies, sanctions, and appeal rights. *And the bases and process for appeal.*

The test: A careful reader who disagrees with the result should still see it was reached fairly, by the evidence, and by the stated standard.

Draft the finding — a close call

1 On these facts, what does “preponderance” actually require you to conclude?

2 How do you write the credibility analysis so it survives an appeal — or a lawsuit?

3 What remedies for Ana, and what sanction for Jordan if responsible?

Resolution models & the reality of respondent suits

Informal resolution

- Available after a formal complaint, with both parties' voluntary written consent
- Never for allegations that an employee harassed a student
- Can be faster and less adversarial where appropriate
- Either party may withdraw and resume the formal process

Why fair process protects you

- Doe v. Univ. of Iowa (8th Cir. 2023): summary judgment for the university on a thorough, credibility-based record
- Doe v. Rollins Coll. (11th Cir. 2023); Doe v. Va. Tech (4th Cir. 2023): respondent challenges turn on process
- Khan v. Yale (2nd Cir. 2023): weak procedural safeguards can cost you immunity
- The lesson: documented fairness is the best defense

Bottom line: Whichever way Ana's case comes out, a fair, well-documented process is what makes the outcome defensible.

7

USING AI IN CAMPUS CIVIL RIGHTS WORK

Practical and responsible use of AI

A supplement to your judgment and knowledge — never a replacement.

The status quo

1 Do you currently use AI in any part of your civil-rights compliance work? If so, how?

2 Are any of your investigators using AI as part of their work?

3 Does your institution or department have a policy on AI use?

Distinctions that matter before you type a prompt

Confidentiality first

Never put confidential investigation details into a consumer AI tool.

Enterprise vs. consumer

An approved enterprise account with data controls is not the same as a personal ChatGPT login.

Open vs. closed systems

Know whether your prompts leave your environment or train the model.

Retention & training

Understand what the vendor keeps — and whether your data trains it.

Privilege

AI use can complicate privilege and work-product protection.

Confirm your options

Check what's approved with IT Security before you start.

Did she solve the problem?

- An investigator on your team uses her personal ChatGPT account to summarize a whistleblower's email.
- She's careful — she removes the whistleblower's name first.

Discussion: Has she solved the confidentiality problem?

Four core risks to keep front of mind

Confidentiality

Consumer tools can expose, retain, or train on sensitive data.

Reliability

Outputs can be wrong, biased, or quietly drift from the source.

Hallucinated authority

AI invents citations, cases, and facts that look real.

Need for human judgment

AI can't read the room, weigh credibility, or own the decision.

The chronology that looked right

- Your team's AI-built chronology says the respondent texted the complainant two days before the incident, citing 'Exhibit 47.'
- You open Exhibit 47 — the texts are actually dated after the incident. The AI misread a European date format (3/3 vs. 30/3).
- No one caught it, because the timeline 'looked right.'

Discussion: What process failure allowed this? What would your quality-control step look like? And — harder — how many entries in that chronology do you now trust?

Where AI can help — and where it can't

Chronology building

Extracts dates/events, flags gaps, standardizes format — but only in an approved environment; treat as a draft (it conflates names and misreads 'last Tuesday').

Document review & triage

Prioritizes, keyword-searches, spots patterns — but humans decide relevance and validate.

Interview preparation

Drafts outlines, rehearsal, post-interview summaries — a supplement, not a substitute; beware unapproved 'silent' notetakers.

Report drafting

Cleans a verified draft, builds summaries, checks consistency — but never conclusions, findings, or credibility calls; verify every detail and citation.

Where do you draw the line?

THE SETUP

There's no single right answer — the point is to surface how differently reasonable teams weigh these risks, and what guardrail each would insist on first.

HOW TO RUN IT

- Take the four investigative use cases above.
- As a table, rank them by risk to your organization — highest to lowest.
- Debate where you'd allow AI today, and where you wouldn't.
- Name the one guardrail you'd require before any of them.

Timing & format: 10 minutes · tables, then report-out

Other uses: training & policy

Training & presentations

- First-draft outlines, decks, facilitator guides, speaker notes
- Scenario and hypothetical generation
- Refreshing stale content
- But: verify every legal statement; real, anonymized cases beat generic AI output; keep confidential details out

Policy & procedure drafting

- Benchmark against published guidance and comparators
- Gap analysis and cross-document consistency checks
- Plain-language rewrites
- But: first drafts only — verify all of it

Bottom line: AI is a great tool — a supplement to your work, not a replacement for it.

Building a responsible-use framework

- ✓ Approve — use only vetted, approved tools.
- ✓ Contain — create and maintain matter-based access controls and guardrails.
- ✓ Verify — verify all information; a human checks all AI-assisted work.
- ✓ Ownership — an identified human author maintains ownership of the final product.
- ✓ Inventory the AI your team actually uses; confirm options with IT Security.
- ✓ Pilot one low-risk workflow (e.g., training content); create guidance — don't let perfect stop a start.
- ✓ If any AI is used, add 'AI use and verification' to your investigator checklist.

One case, one set of skills

- The same architecture runs every civil-rights matter — Title IX, Title VI, disability, employee
- Intake: move on safety and support; scope for control; document the reasons
- Investigation: preserve evidence, interview neutrally, weigh credibility on articulable factors
- Hearing: gatekeep relevance, apply one standard, write findings that show their work
- Fair, documented process is both the right thing and your best defense
- Use AI as a supplement, never a replacement — approve, contain, verify, own

KEEP IN TOUCH

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