Title IX Hearings

Thompson Coburn LLP
Title IX Training Series | July 2020

Thompson Coburn LLP

- Full-service law firm with over 380 attorneys.
- Offices in Chicago, Los Angeles, St. Louis, Dallas, and Washington, D.C.
- Higher education practice provides legal counsel, compliance, and training services to colleges and universities.

Higher Education Practice

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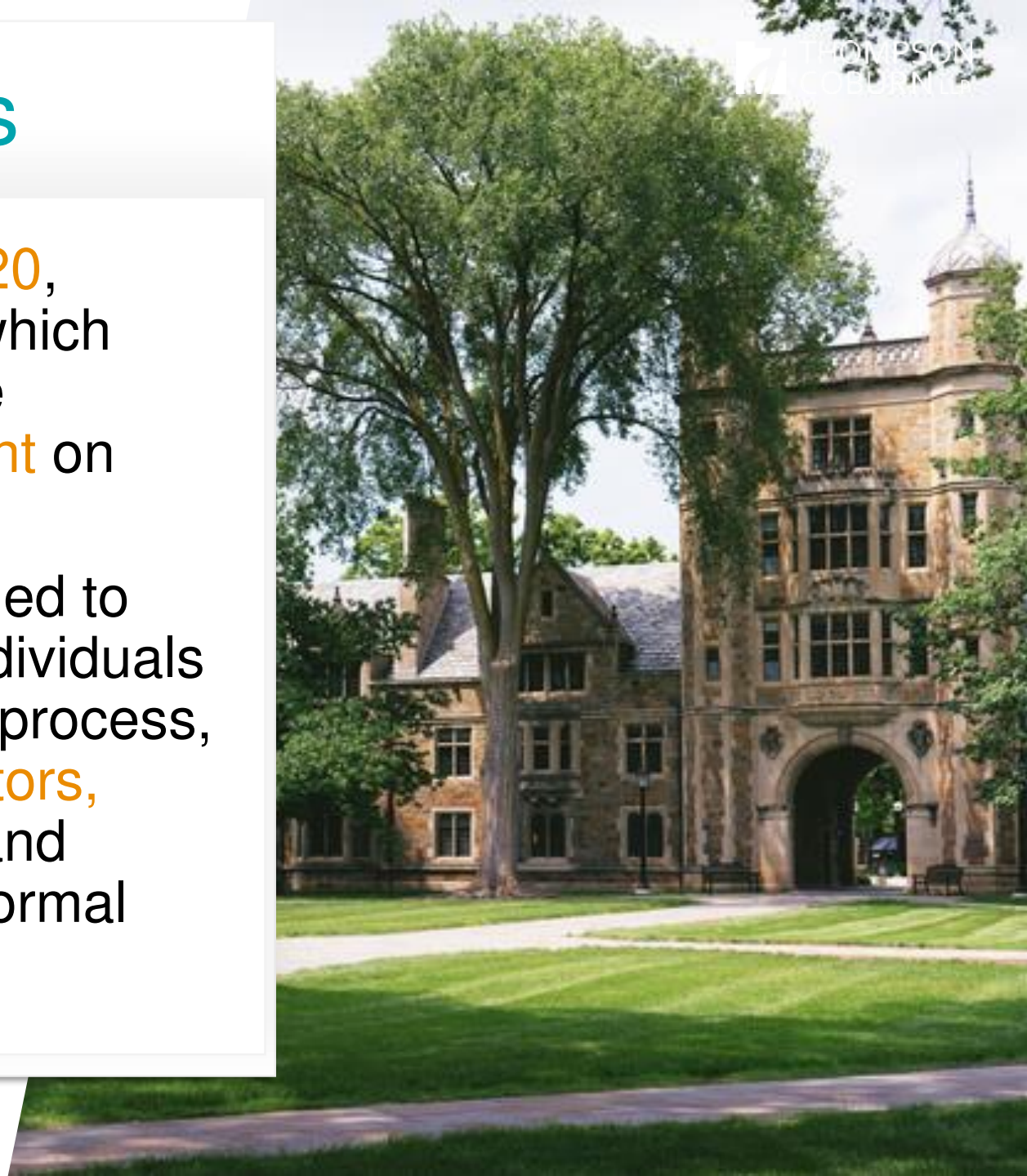
Purpose of Training Series

The Title IX rule effective August 14, 2020, creates a new and specific process by which postsecondary institutions must manage complaints of covered sexual harassment on campus.

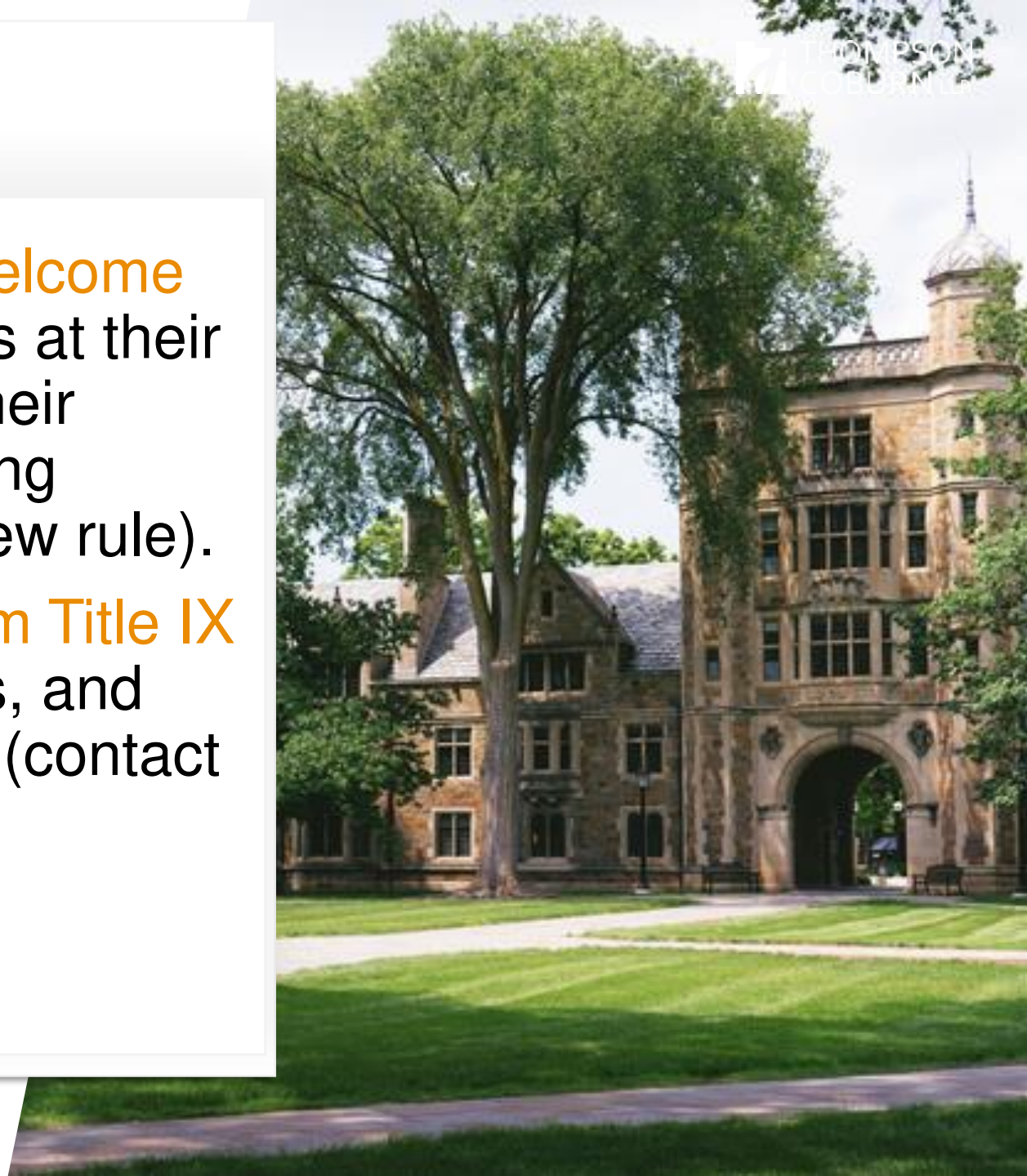
The TC Title IX Training Series is designed to provide foundational training to those individuals who will help to administer this required process, including Title IX coordinators, investigators, adjudicators, advisors, appeal officers, and individuals responsible for managing informal resolutions.



Use of Training Series

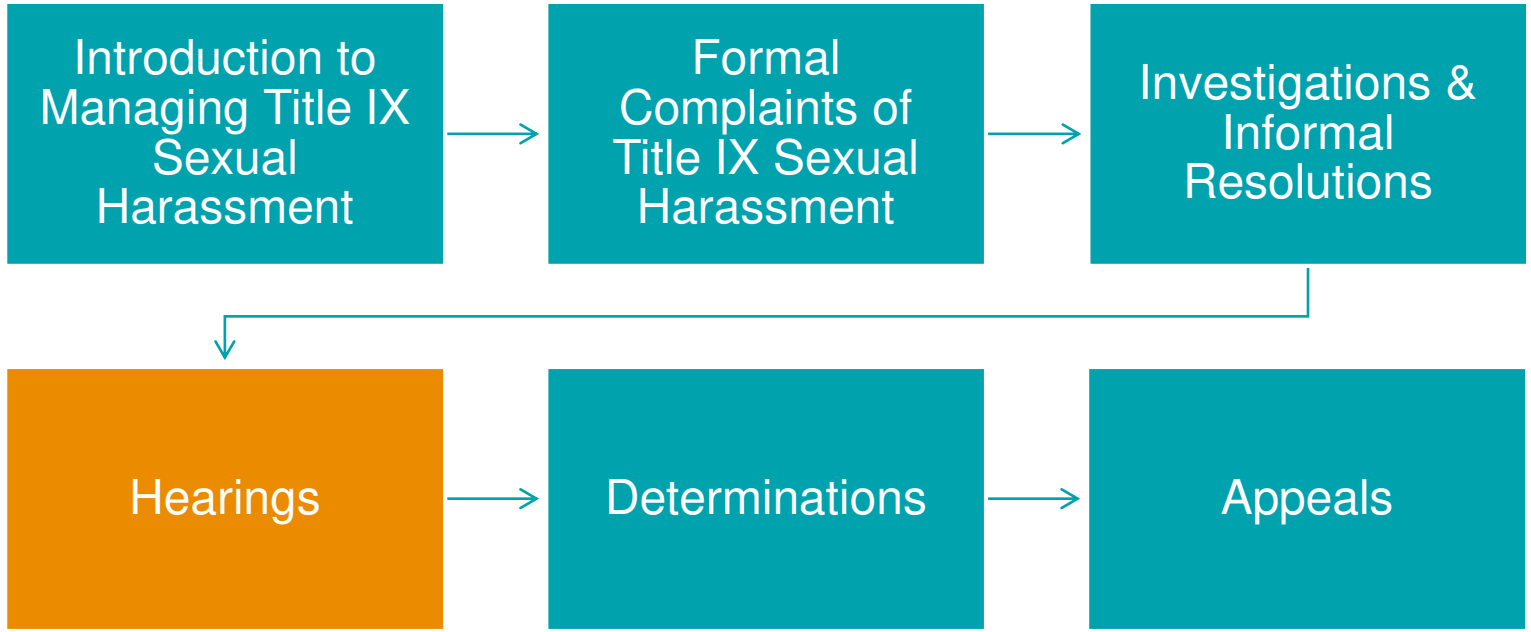
Institutions of higher education are welcome to use this foundational training series at their discretion, and to post the series to their websites as part of their Title IX training materials (a requirement under the new rule).

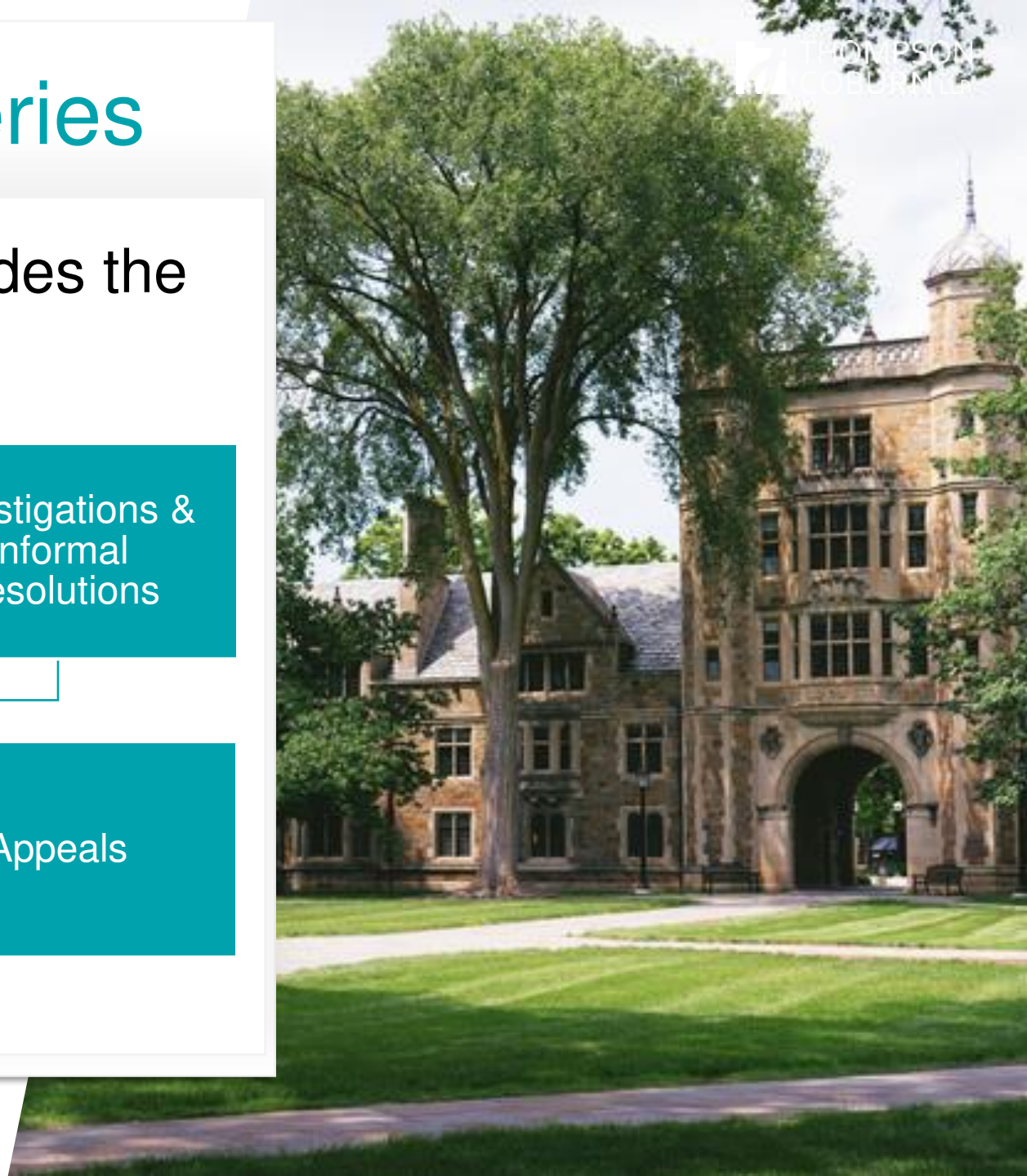
TC also is available to prepare custom Title IX training sessions, hearing simulations, and other assistance with Title IX matters (contact Aaron Lacey or Scott Goldschmidt).



Curriculum for Training Series

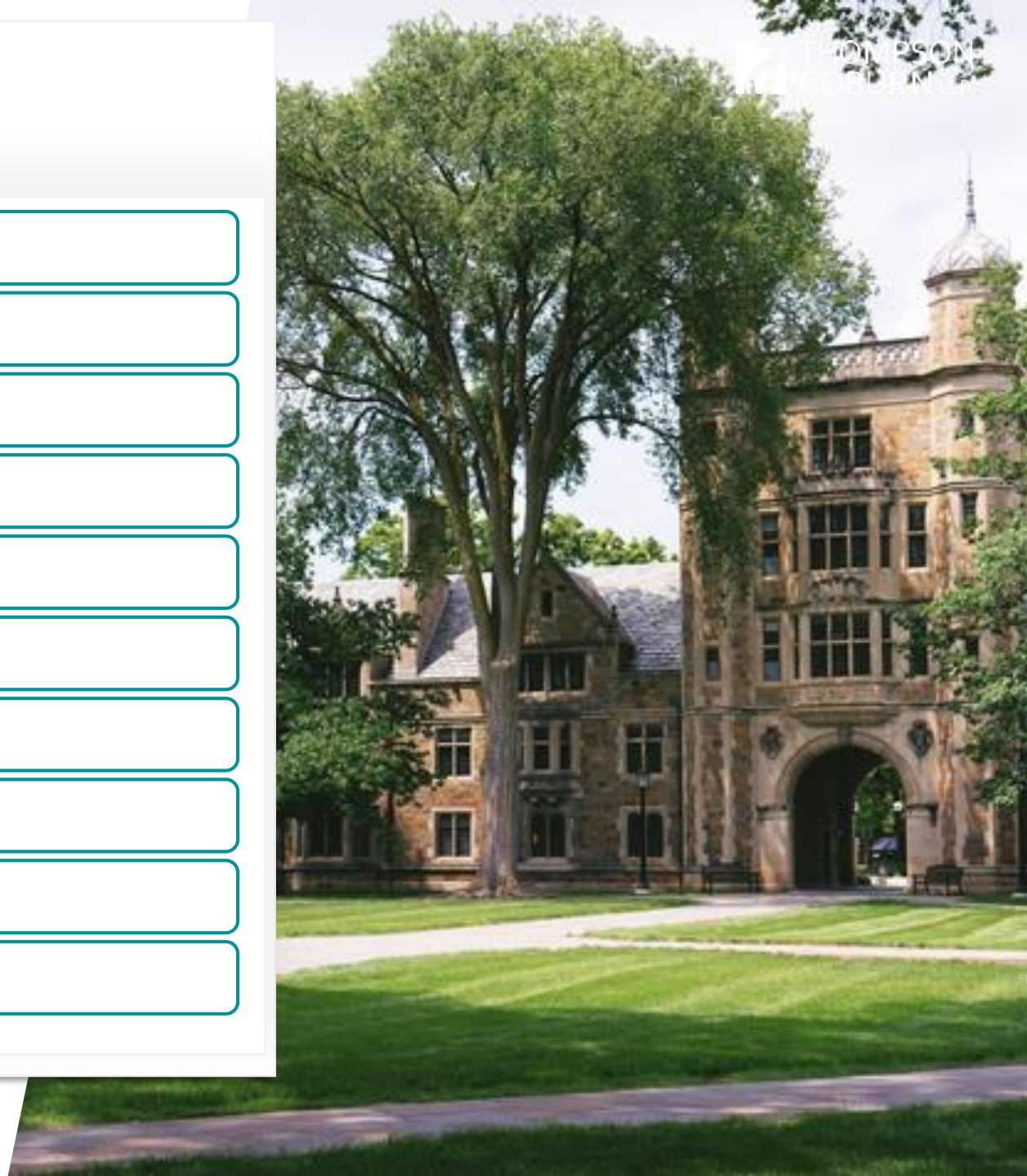
The foundational training series includes the following six sessions:





Syllabus for this Session

- The Formal Complaint Framework
- Key Concepts
- Live Hearings
- Advisors
- Cross-Examination
- Relevance
- Credibility
- Burden of Proof
- Evidence
- Legal Privileges



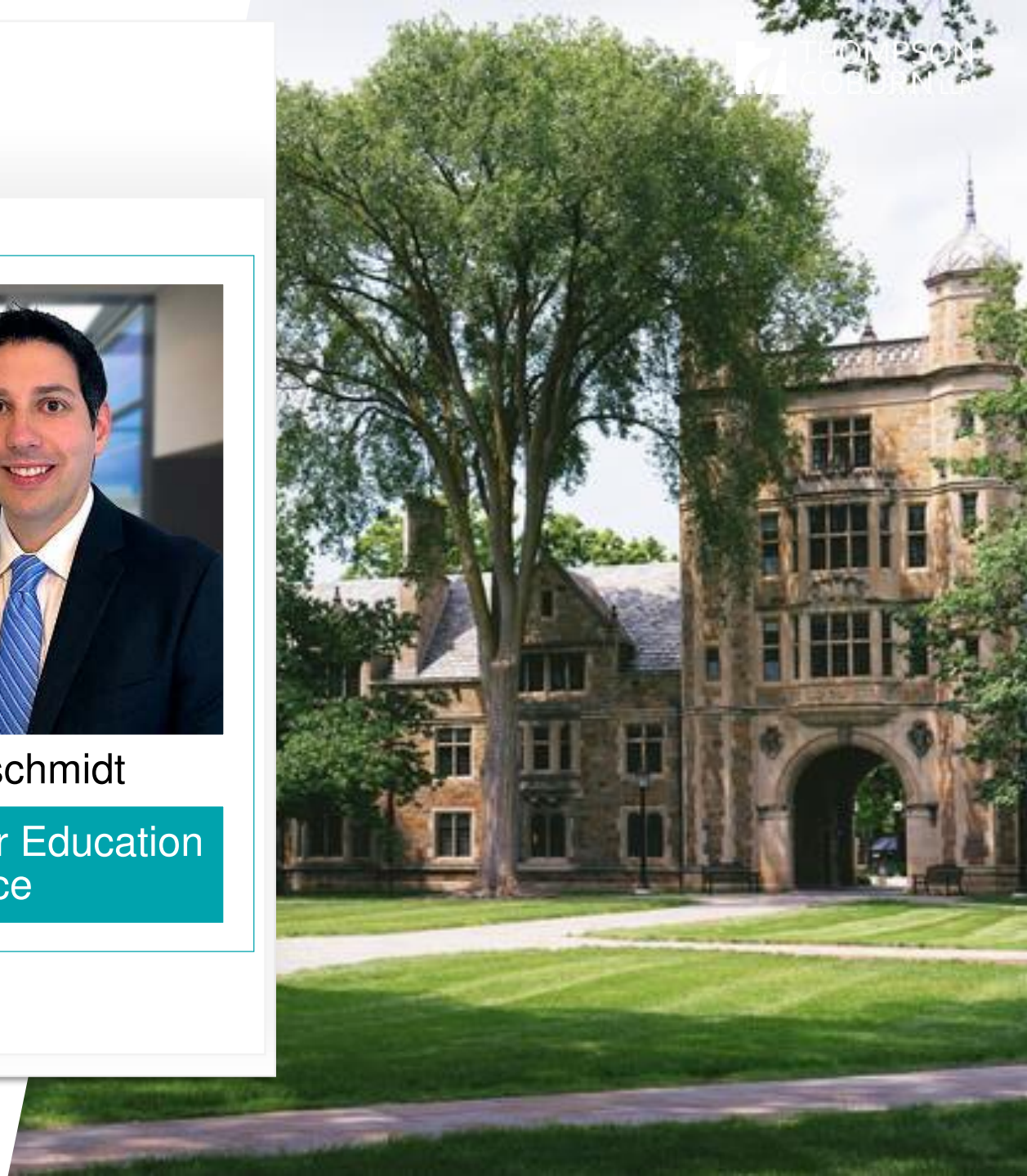
Session Presenters

Ret. Judge Booker Shaw

Partner, Litigation & Appellate Practice

Scott Goldschmidt

Counsel, Higher Education Practice



The Formal Complaint Framework

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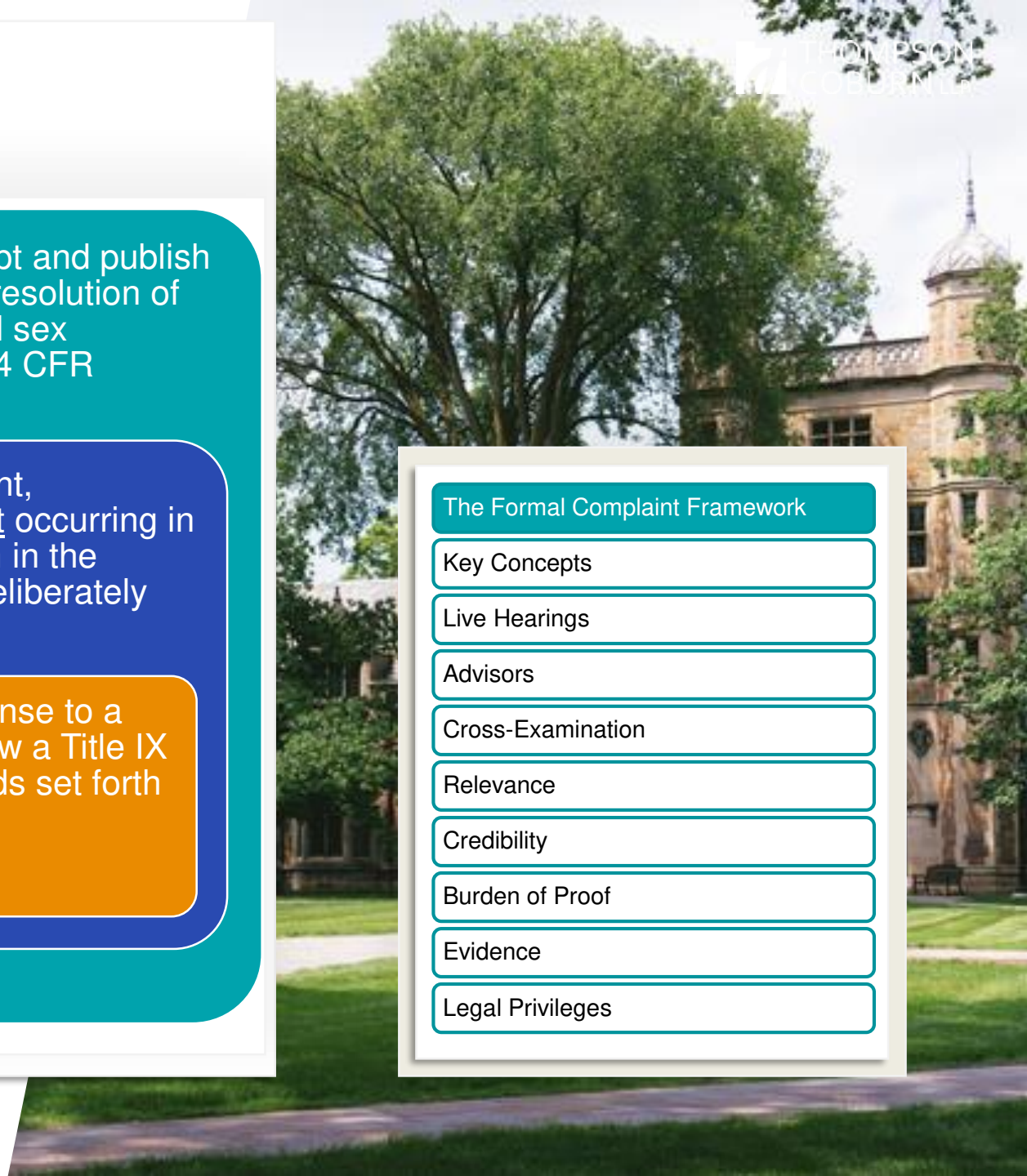
The Big Picture

Discrimination Based on Sex: Institutions are obligated to adopt and publish grievance procedures that provide for the prompt and equitable resolution of student and employee complaints alleging any form of prohibited sex discrimination occurring against a person in the United States. 34 CFR 106.8(c)-(d).

Title IX Sexual Harassment: With or without a formal complaint, institutions with actual knowledge of Title IX sexual harassment occurring in an education program or activity of the school against a person in the United States must respond promptly in a manner that is not deliberately indifferent and complies with 34 CFR 106.44(a).

Formal Complaint of Title IX Sexual Harassment: In response to a formal complaint of sexual harassment, institutions must follow a Title IX formal complaint process that complies with the new standards set forth in 34 CFR 106.45.



The Formal Complaint Framework

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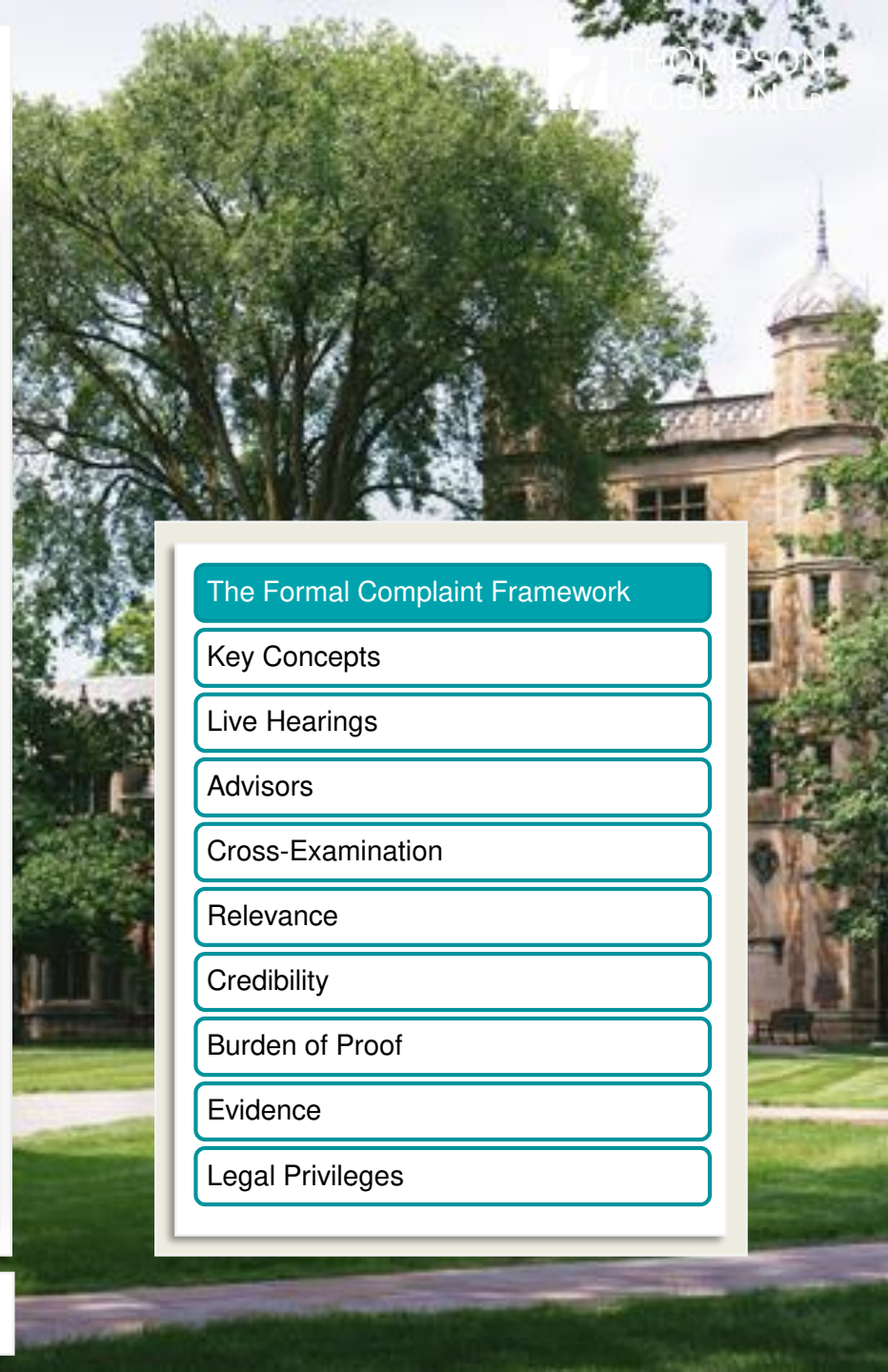
Formal Complaints

A formal complaint of Title IX sexual harassment means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.

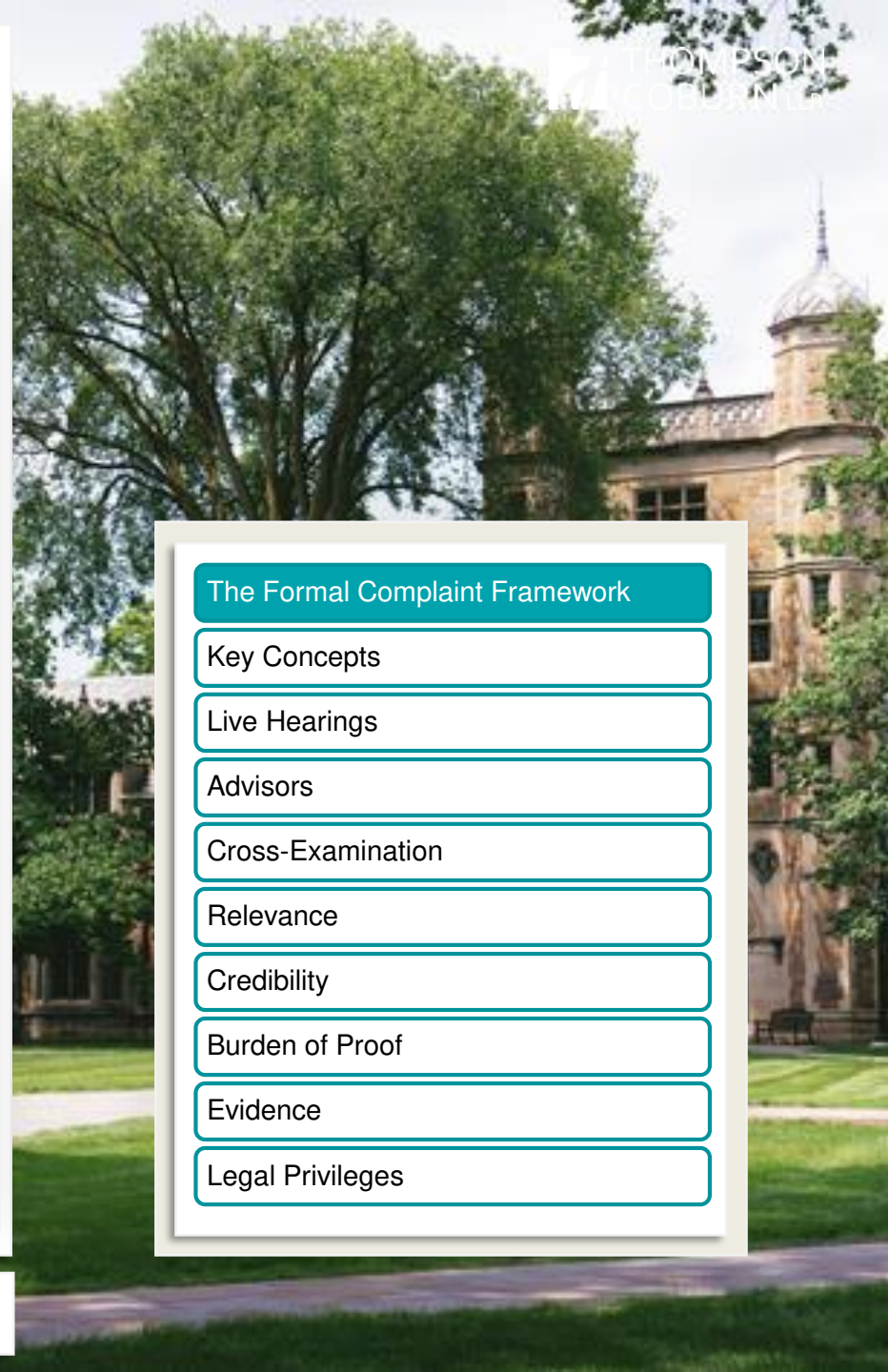
For the purpose of addressing formal complaints of sexual harassment, a school's Title IX complaint process must comply with a wide range of specific requirements set out in the new rule, including specific requirements concerning hearings.



34 CFR 106.30(a)-(b) (August 14, 2020).

Formal Complaint Process

Core Requirements	• Details 10 core requirements of formal complaint process
Complaint Dismissal	• Grounds for dismissal and procedural requirements
Consolidation	• Complaint consolidation in specific circumstances
Notice of Allegations	• Requirements for initial and ongoing notice to parties
Investigations	• 7 required elements of formal investigation
Informal Resolutions	• Permits informal resolution where appropriate
Hearings	• Hearing requirements, including cross-x and advisors
Determinations	• Requirements for adjudicators and determinations
Appeals	• Grounds and procedures for appeals
Recordkeeping	• Record maintenance requirements for specified periods



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34 CFR 106.45(b)(1)-(10) (August 14, 2020).

Key Concepts

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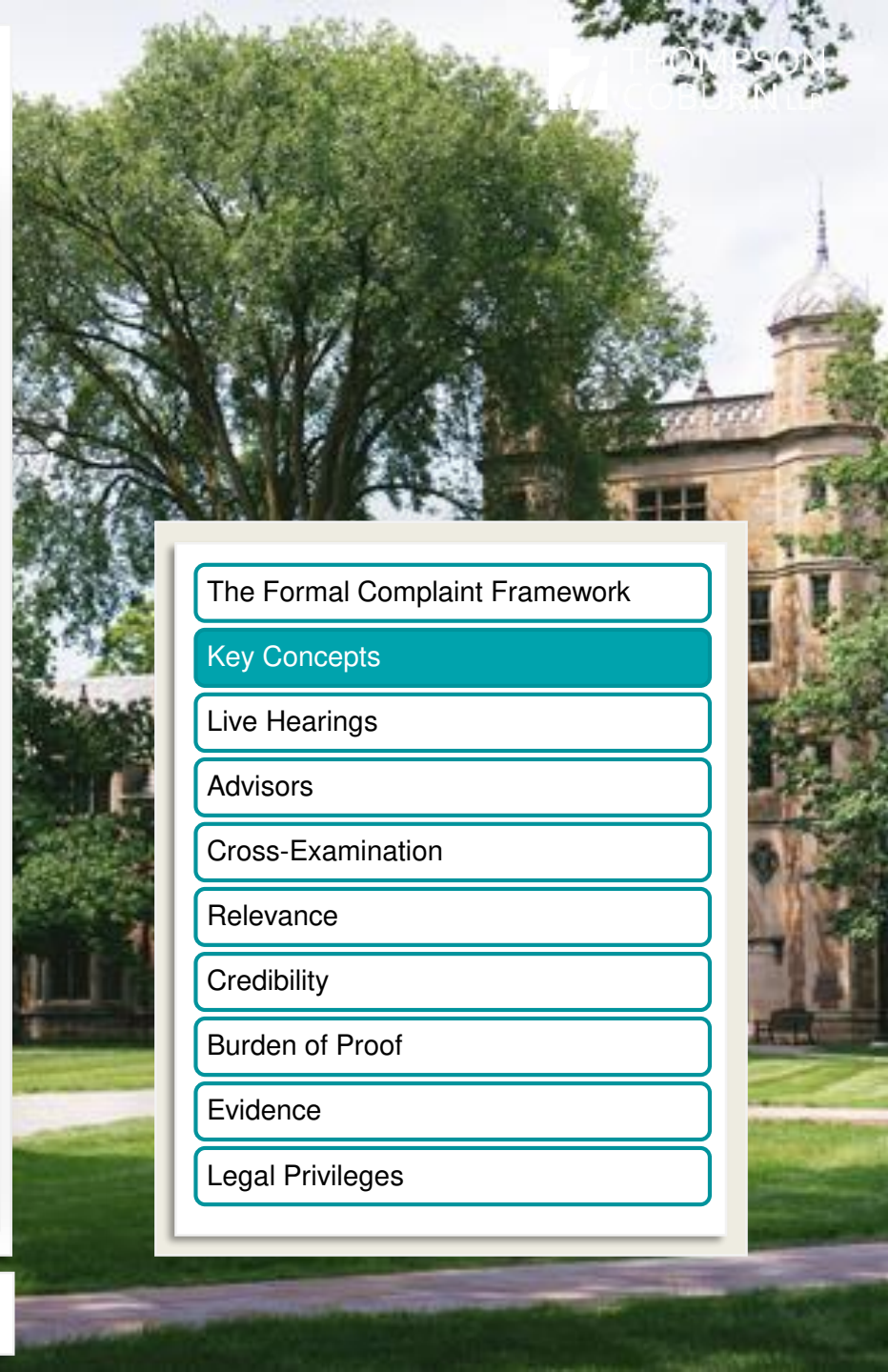
Key Concepts

- Treat complainants and respondents equitably.
- Objectively evaluate all relevant evidence – including both inculpatory and exculpatory evidence – and provide that credibility determinations may not be based on a person's status as a complainant, respondent, or witness.
- Understand the presumption that the respondent is not responsible for the alleged conduct until a determination is made at the end of the grievance process.

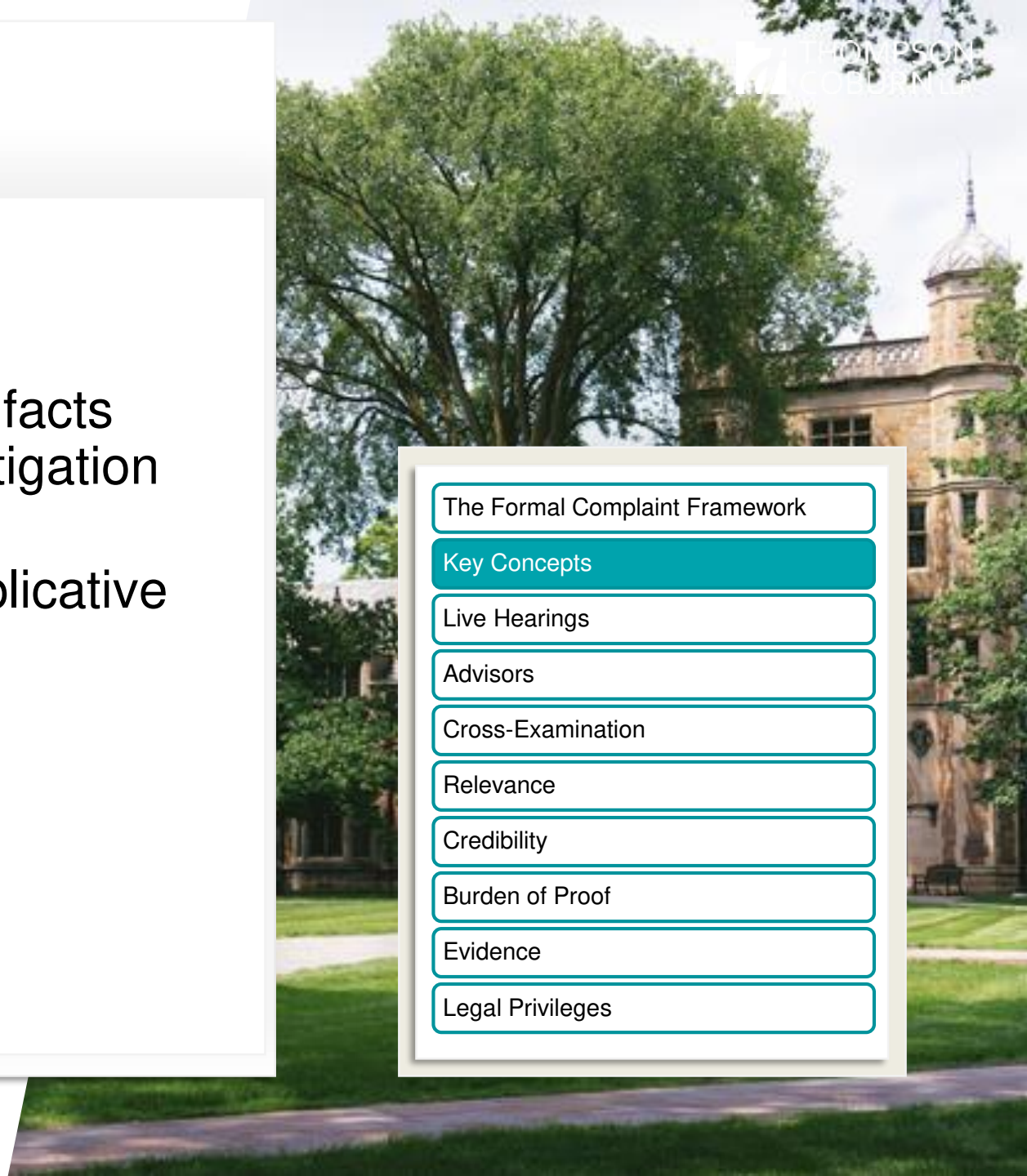


34 CFR 106.45(b) (August 14, 2020).

Key Concepts

What is “relevance” and “relevant evidence”?

- Evidence pertinent to proving whether facts material to the allegations under investigation are more or less likely to be true.
- Repetition of the same question or duplicative evidence may be deemed irrelevant.



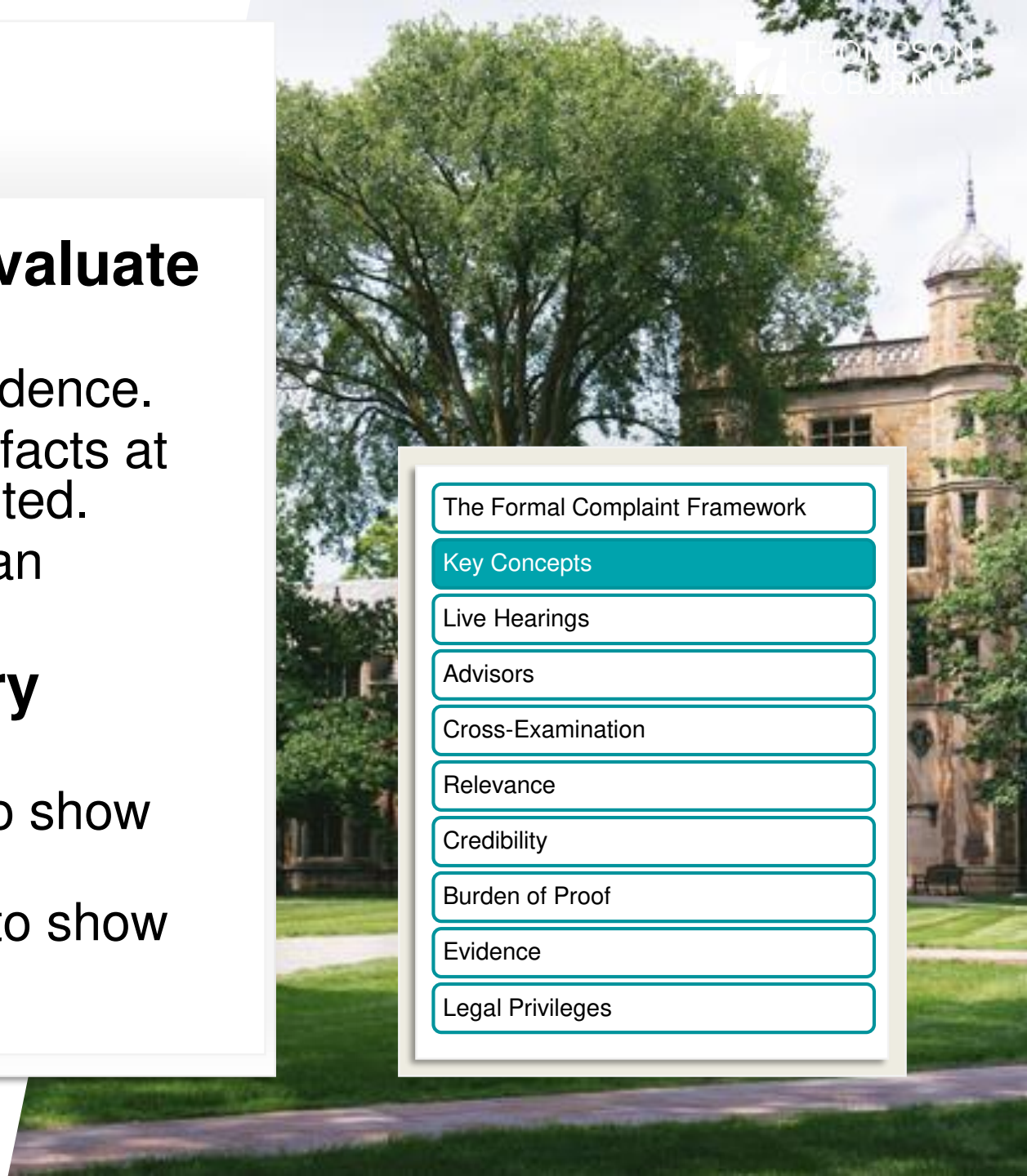
Key Concepts

What does it mean to objectively evaluate relevant evidence?

- Impartial consideration of available evidence.
- No prejudgment of parties, witnesses, facts at issue, or how facts at issue are presented.
- No deference to recommendations of an investigator.

What is inculpatory and exculpatory evidence?

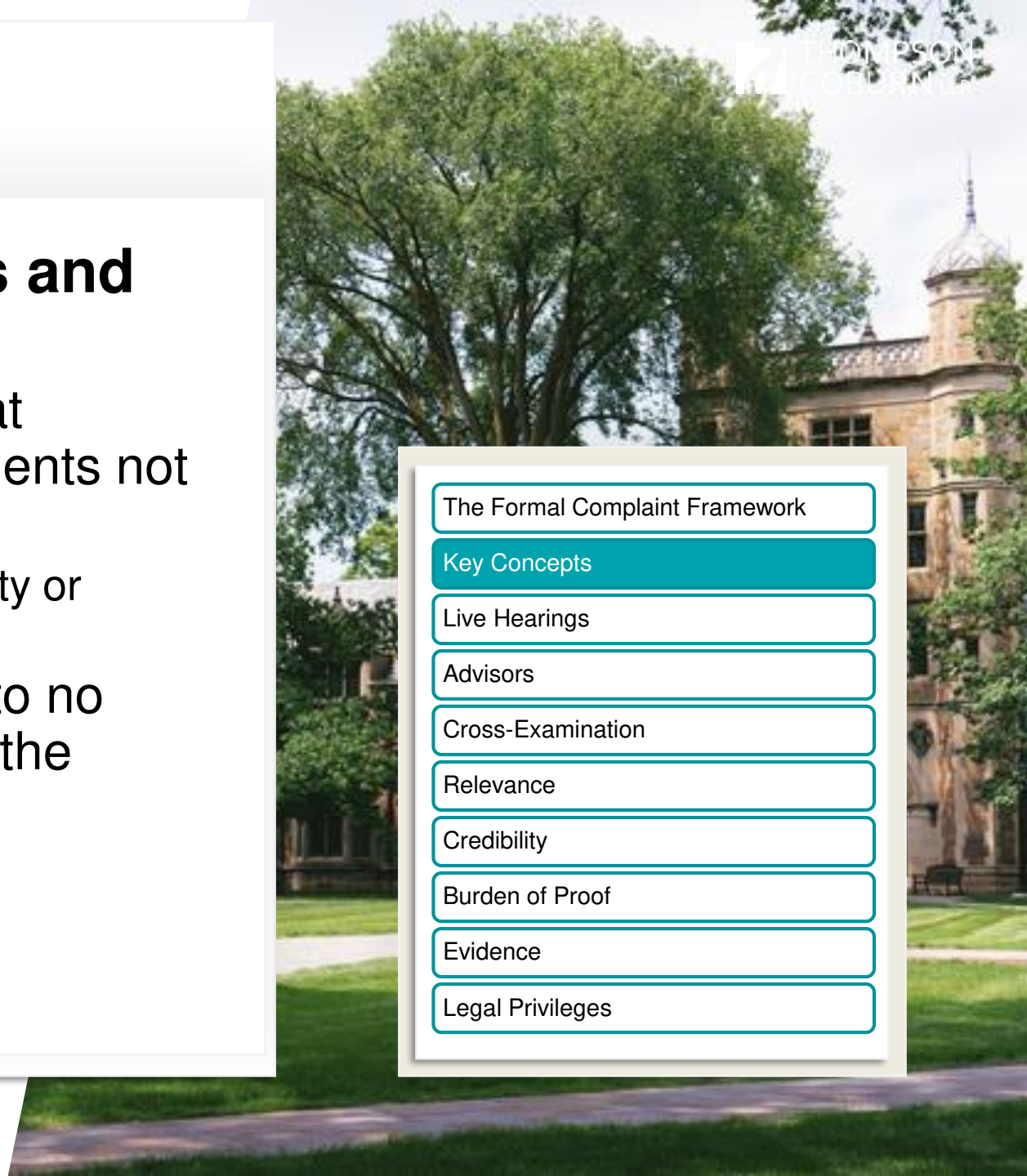
- Inculpatory evidence shows or tends to show respondent's responsibility.
- Exculpatory evidence shows or tends to show the respondent is not responsible.



Key Concepts

What are credibility determinations and why are they significant?

- A determination by adjudicators of what statements to believe and what statements not to believe.
  - Adjudicators may believe everything a party or witness says, part of it, or none or it.
- In some situations, there may be little to no evidence other than the statements of the parties themselves.



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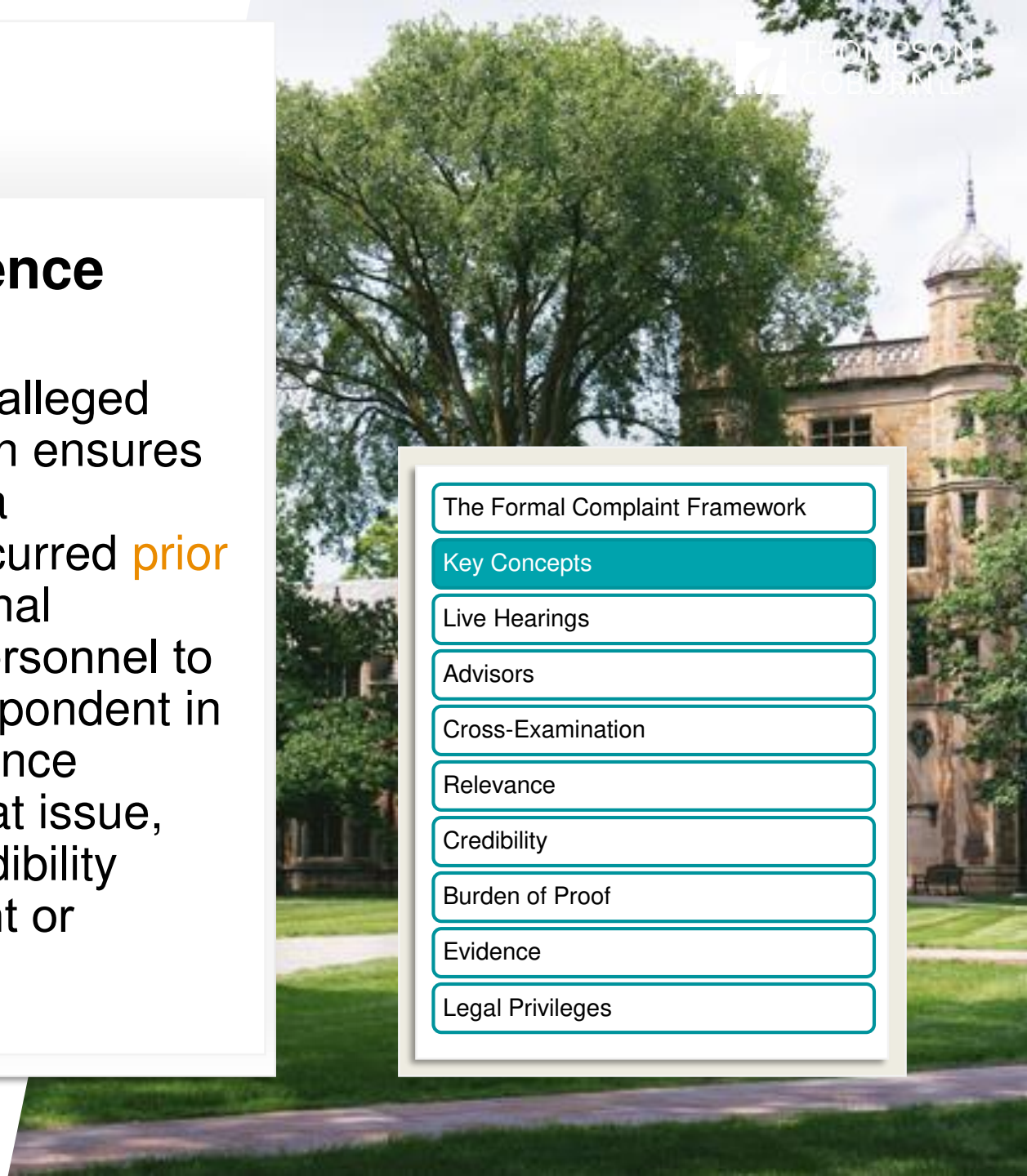
Key Concepts

What does the presumption of innocence mean for the respondent?

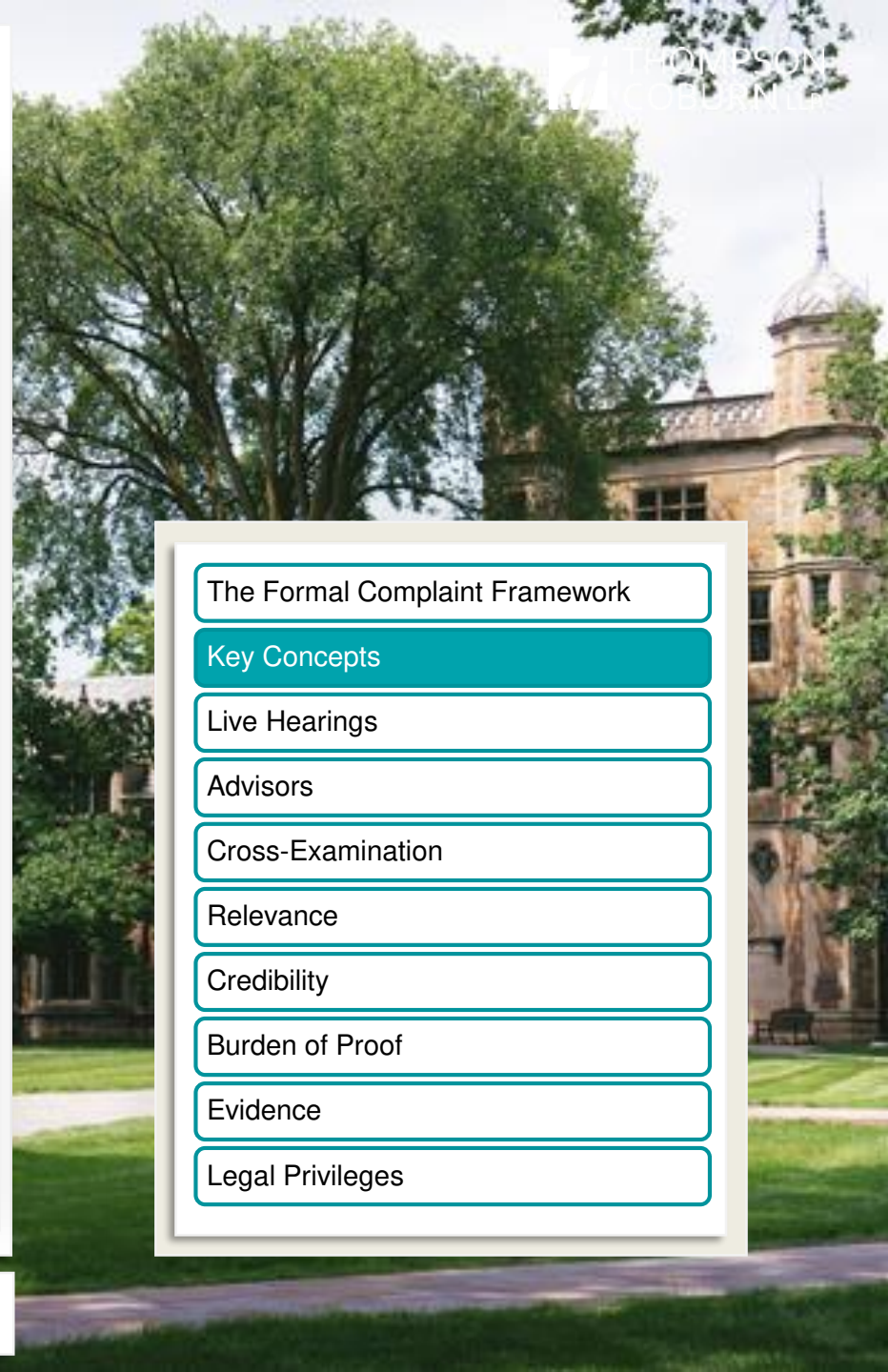
- "The presumption does not imply that the alleged harassment did not occur; the presumption ensures that recipients do not take action against a respondent as though the harassment occurred prior to the allegations being proved, and the final regulations require a recipient's Title IX personnel to interact with both the complainant and respondent in an impartial manner throughout the grievance process without prejudgment of the facts at issue, and without drawing inferences about credibility based on a party's status as a complainant or respondent."



85 Fed. Reg. 30259 (May 19, 2020).

Key Concepts

- Ensure decision-makers do not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.
- Understand the standard of evidence – either the preponderance of the evidence or clear and convincing evidence standard.
- Do not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.



34 CFR 106.45(b) (August 14, 2020).

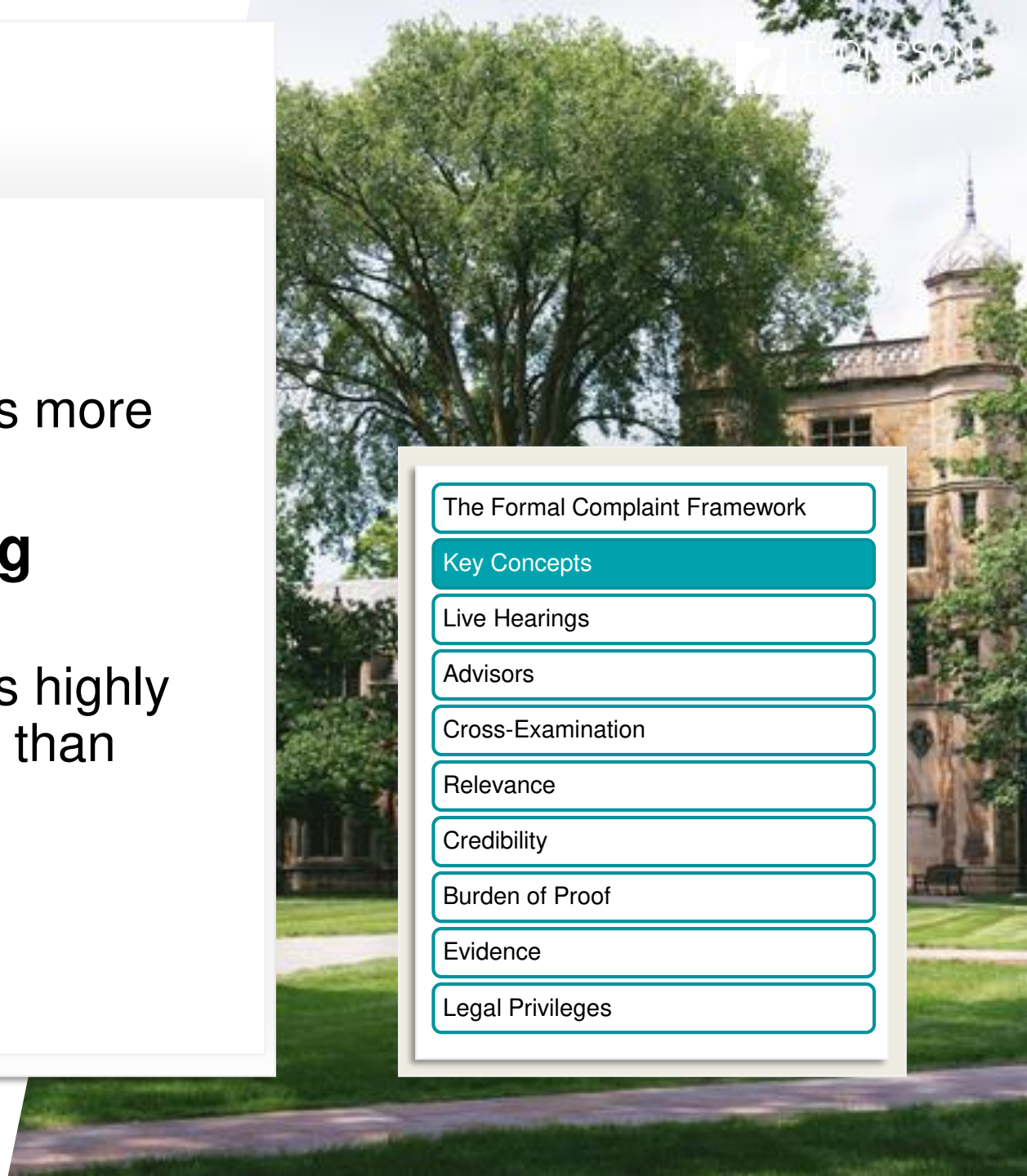
Key Concepts

What is the preponderance of the evidence standard mean?

- Proof that a particular fact or event was more likely than not to have occurred.

What does the clear and convincing standard mean?

- Proof that a particular fact or event was highly and substantially more likely to be true than untrue.



Live Hearings

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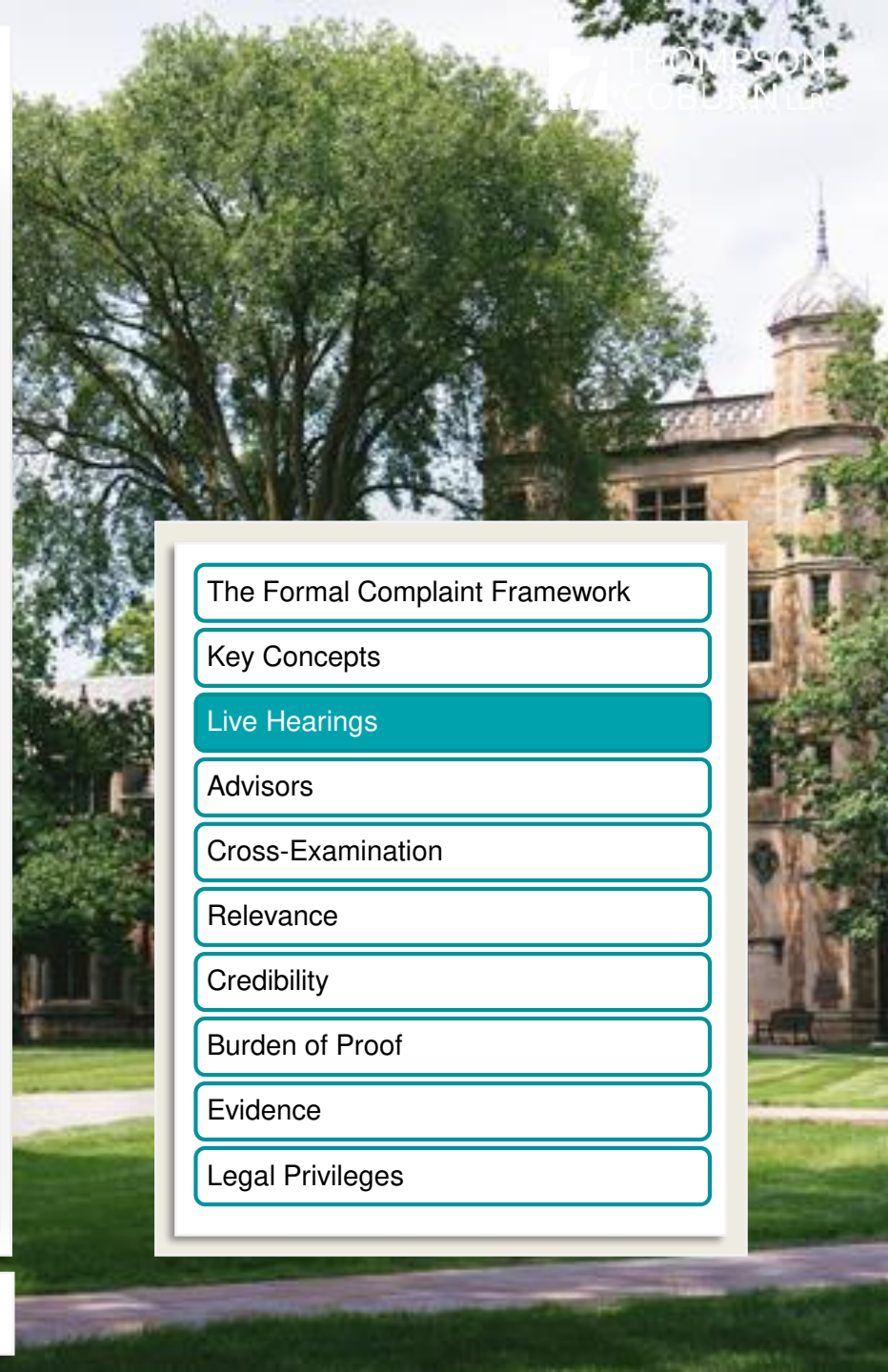
Live Hearings Required

Institutions are required to include a live hearing in their formal complaint process.

- The adjudicator cannot be the same person as the Title IX Coordinator or the investigator.

Absent any request from the parties, live hearings may be conducted either with all parties physically present or with participants appearing virtually, with technology enabling them to see and hear each other.

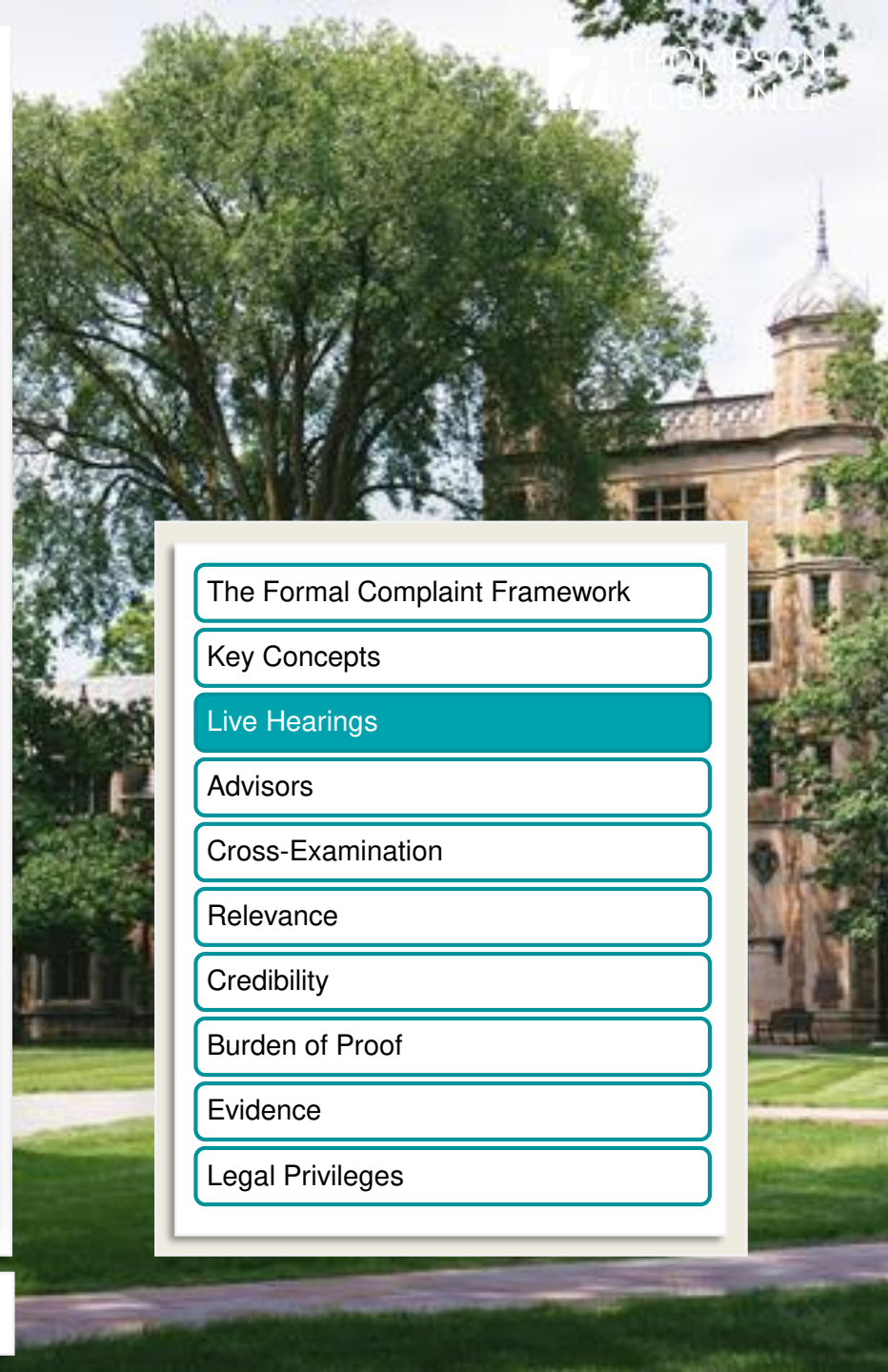


34 CFR 106.45(b)(6) (August 14, 2020).

Keep ‘Em Separated

At the request of either party, schools must provide for the live hearing to occur with the parties located in separate rooms, with technology enabling the adjudicator and parties to simultaneously see and hear the party or the witness answering questions.

Schools must create an audio or audiovisual recording, or transcript, of any live hearing and make it available to the parties for inspection and review.



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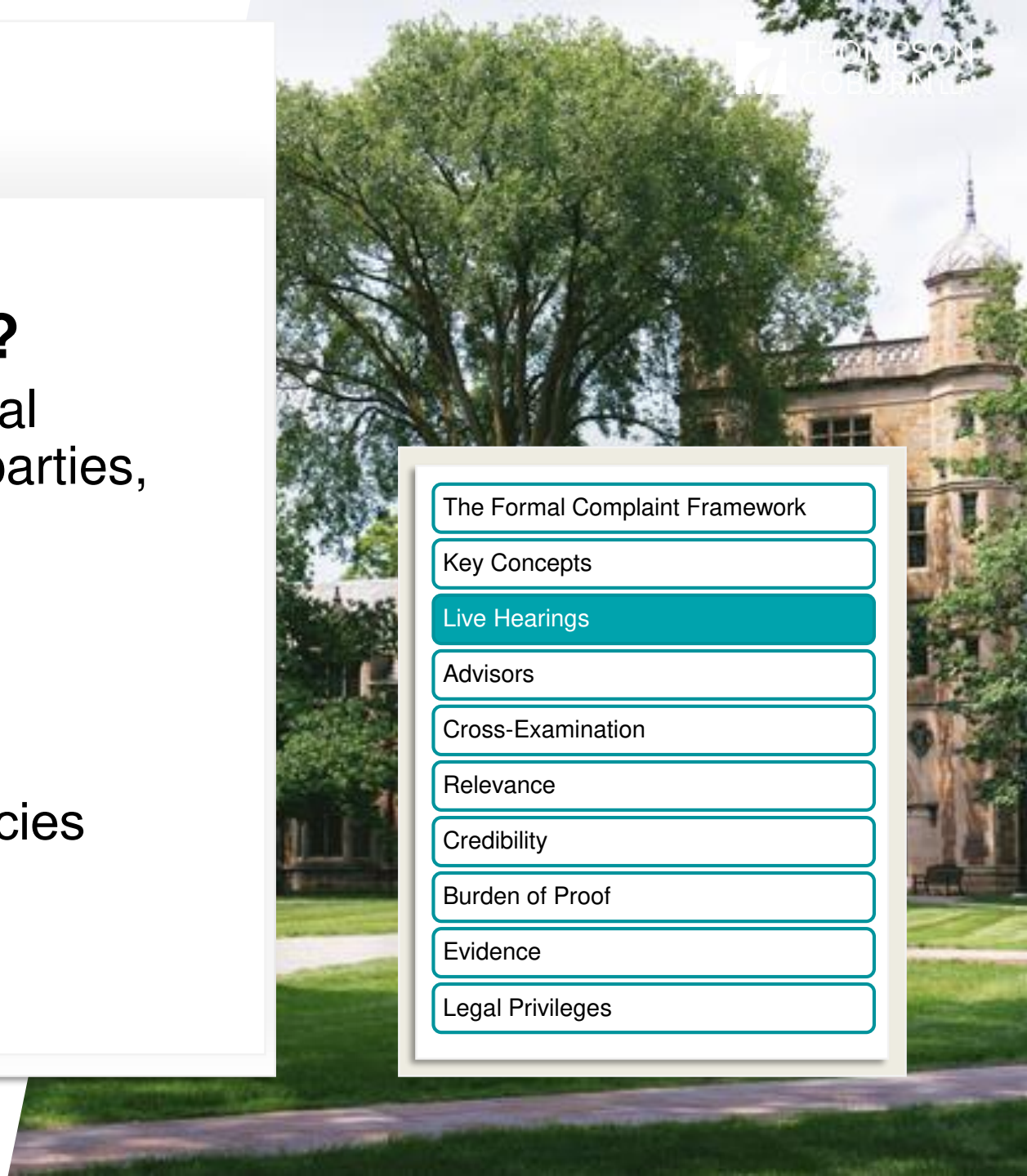
34 CFR 106.45(b)(6) (August 14, 2020).

Rules for Hearings

What rules can institutions adopt regarding the conduct of hearings?

- So long as all rules comply with the final regulations and apply equally to both parties, schools can adopt rules concerning:
  - Rules of decorum.
  - Timing and length of breaks.
  - Prohibition on disturbing the hearings.
  - Prohibition on badgering witnesses.
- Make sure to review your school's policies thoroughly.



Advisors

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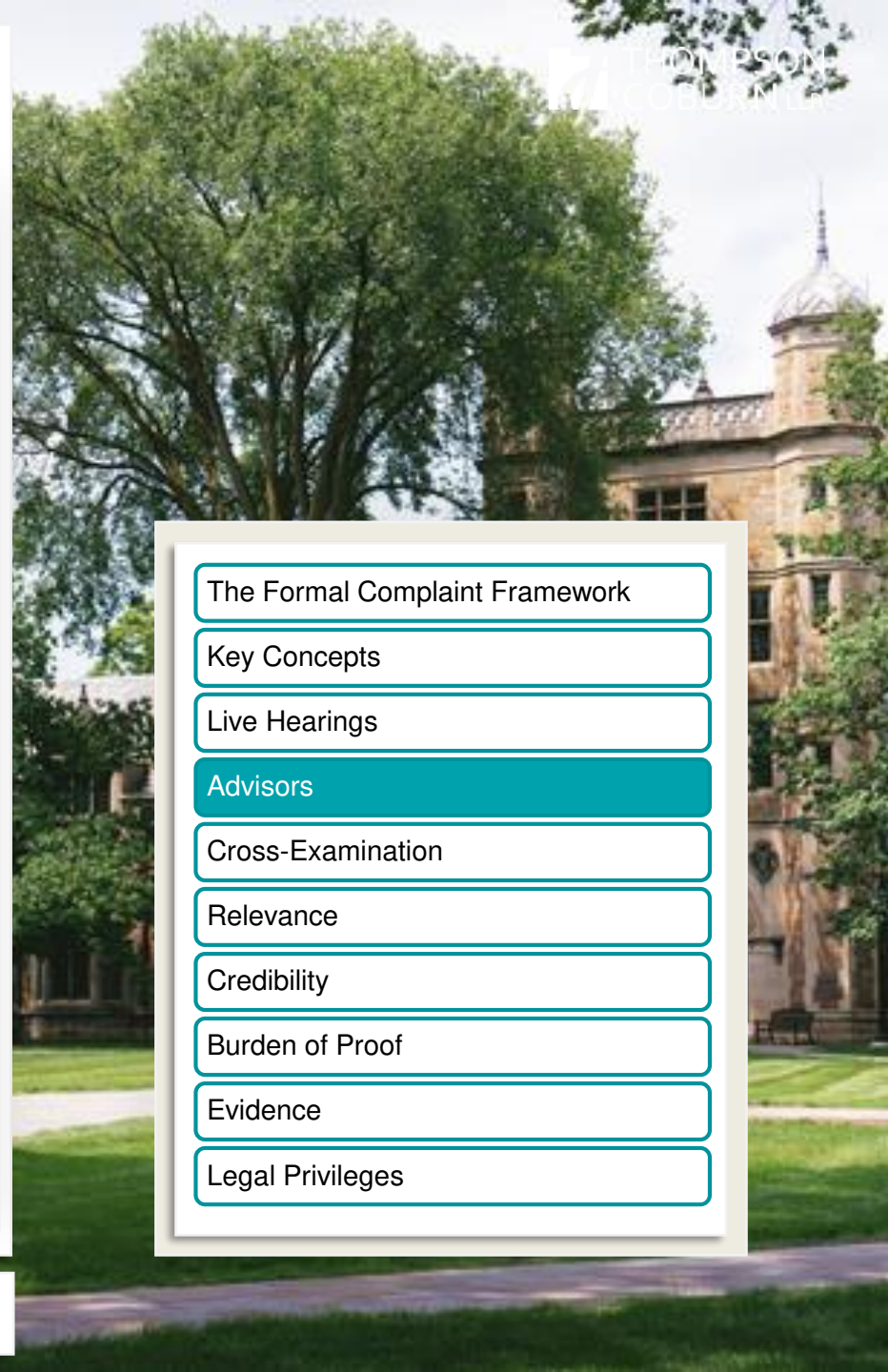
Advisors

- Schools must afford the parties equal opportunity to have an advisor during any aspect of the formal complaint process.
- Advisors may be an attorney.
- Schools may not restrict the choice of advisor or the advisor's presence.
- Schools may restrict advisor participation in the proceedings, as long as the restrictions apply equally.



34 CFR 106.45(b)(5) (August 14, 2020).

Cross-Examination

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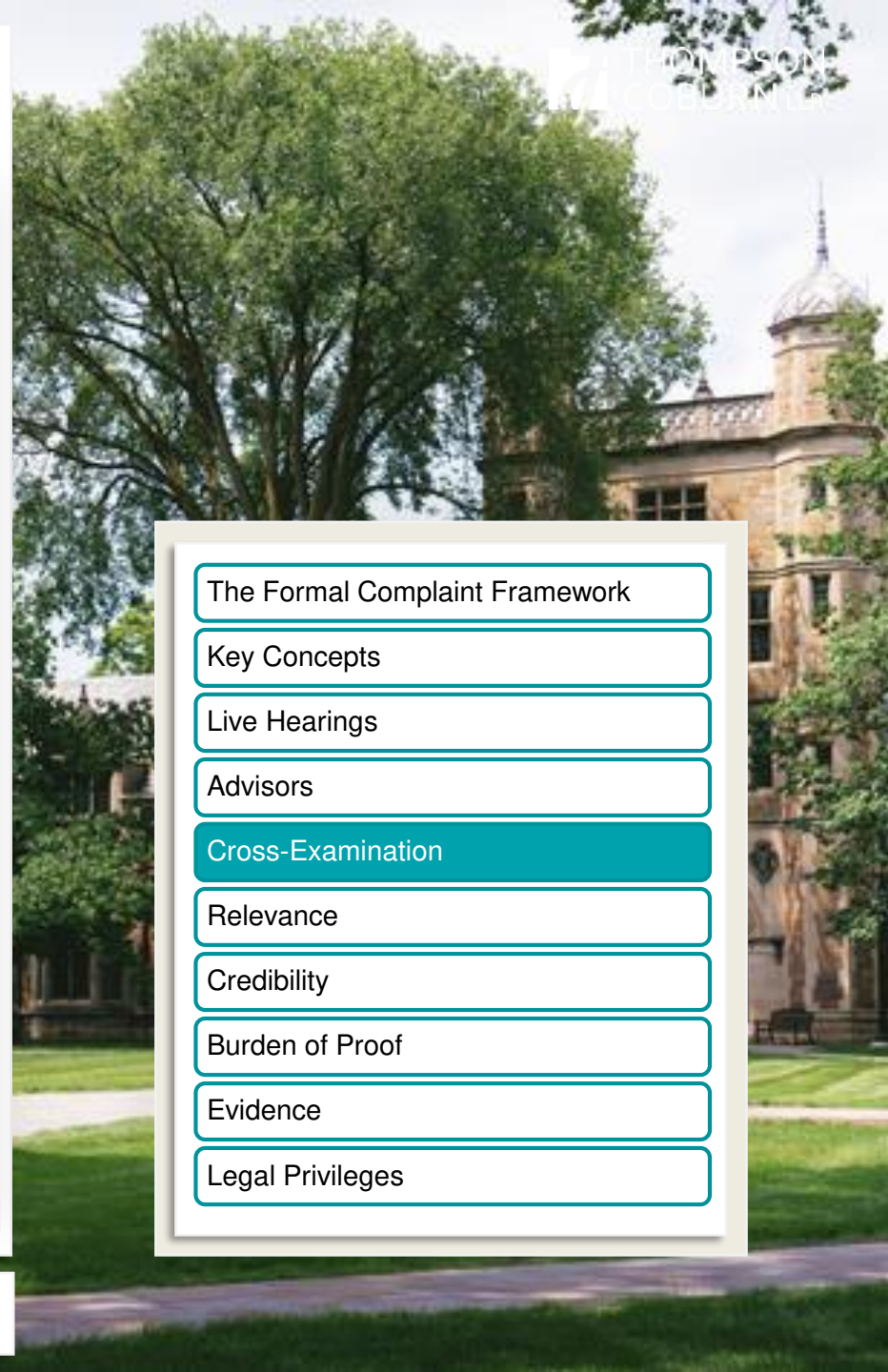
Cross-Examination Required

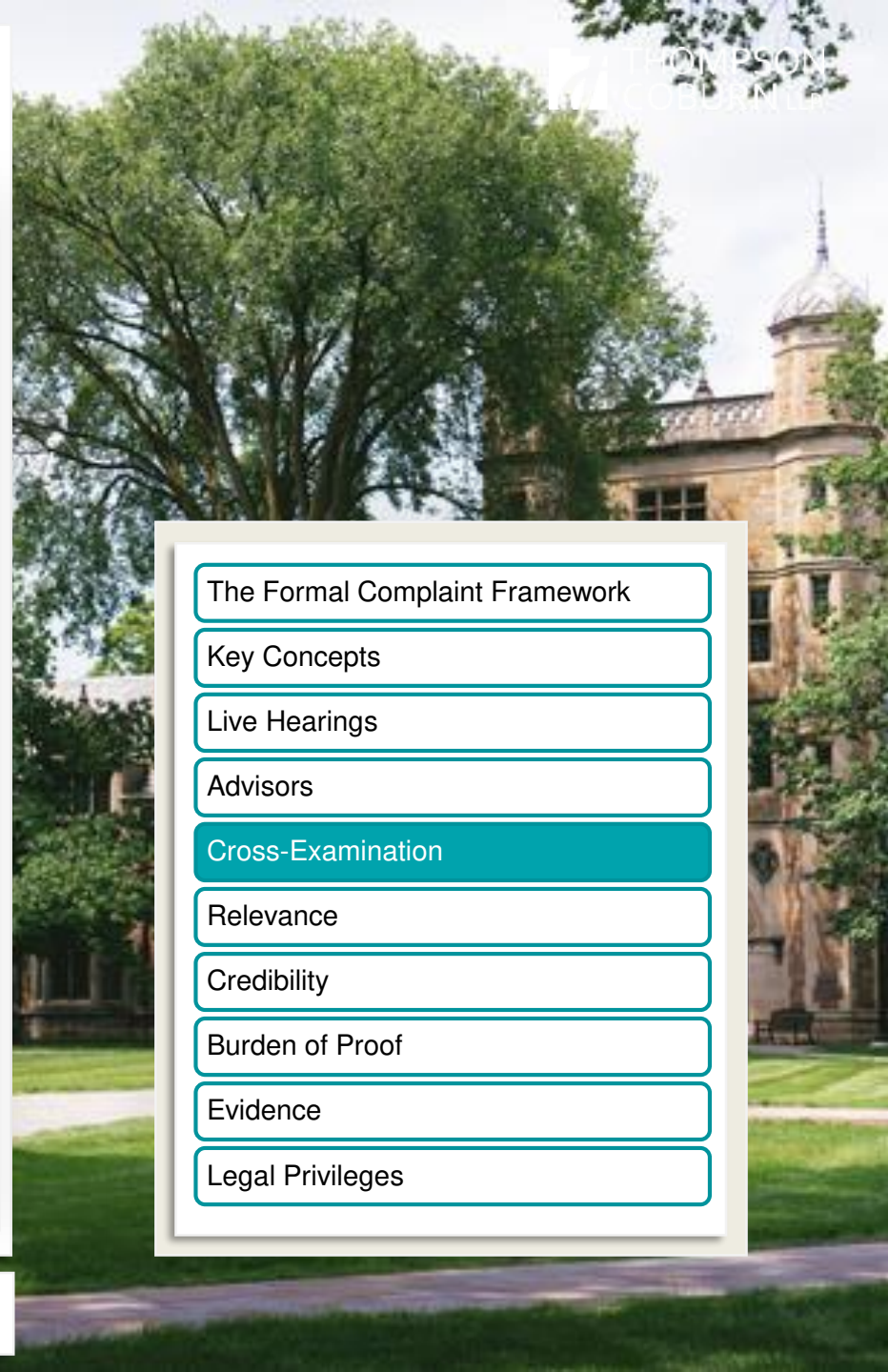
- Adjudicators must permit each party's advisor to cross-examine the other party and any witnesses.
- Cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor and never by a party personally.
- If a party does not have an advisor, the school must provide an advisor of its choice, free of charge, to conduct cross-examination. The advisor may be, but is not required to be, an attorney.



34 CFR 106.45(b)(6) (August 14, 2020).

Why Advisors?

"…the Department does not believe that the benefits of adversarial cross-examination can be achieved when conducted by a person ostensibly designated as a "neutral" official. This is because the function of cross-examination is precisely *not* to be neutral but rather to point out in front of the neutral decision-maker each party's unique perspective about relevant evidence and desire regarding the outcome of the case."



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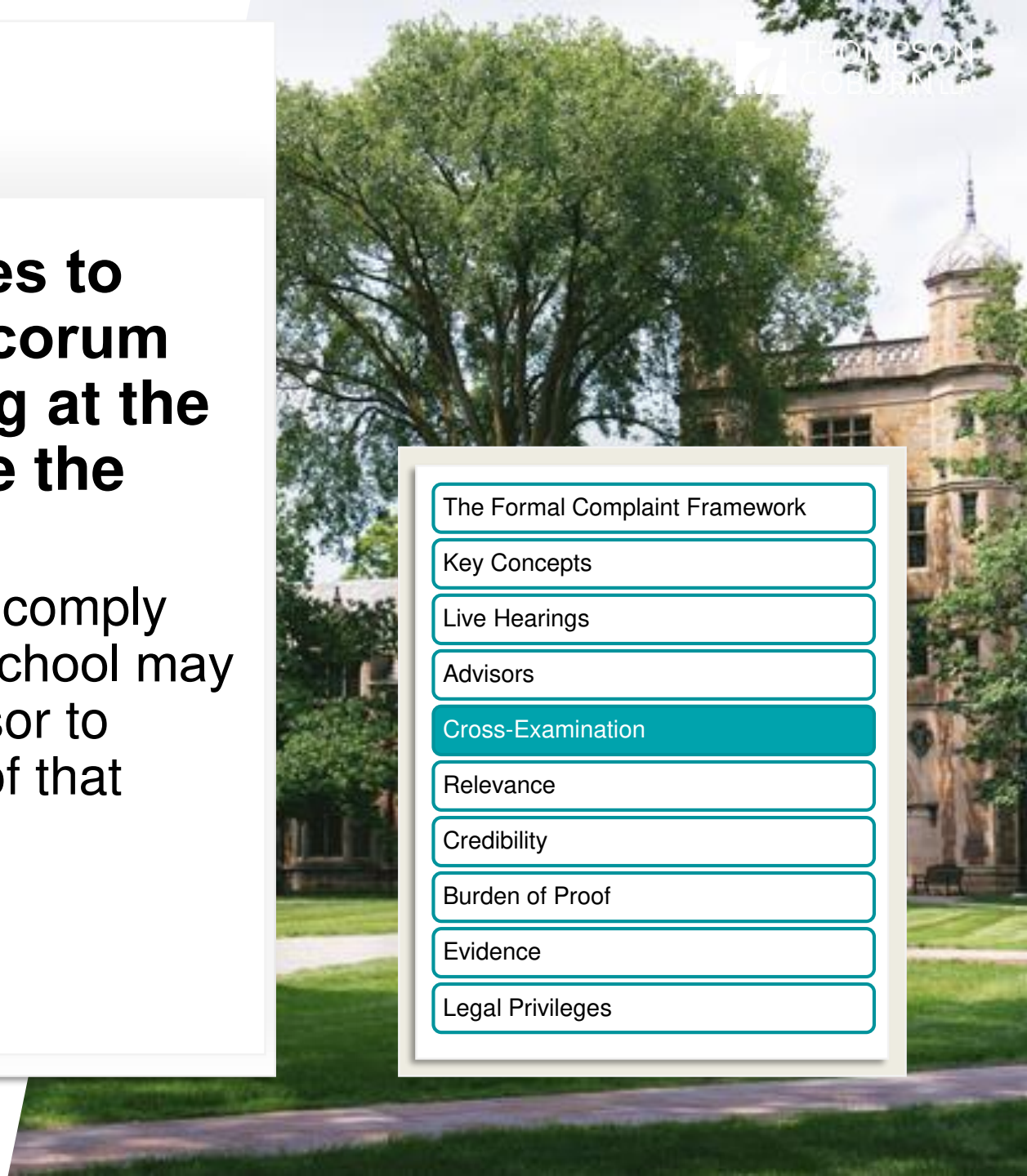
85 Fed. Reg. 30335 (May 19, 2020).

Adversarial Advisors

If a party's advisor of choice refuses to comply with a school's rules of decorum (for example, by insisting on yelling at the other party), can the school require the party to use a different advisor?

- Yes. Similarly, if the advisor refuses to comply with a school's rules of decorum, the school may provide that party with a different advisor to conduct cross-examination on behalf of that party.



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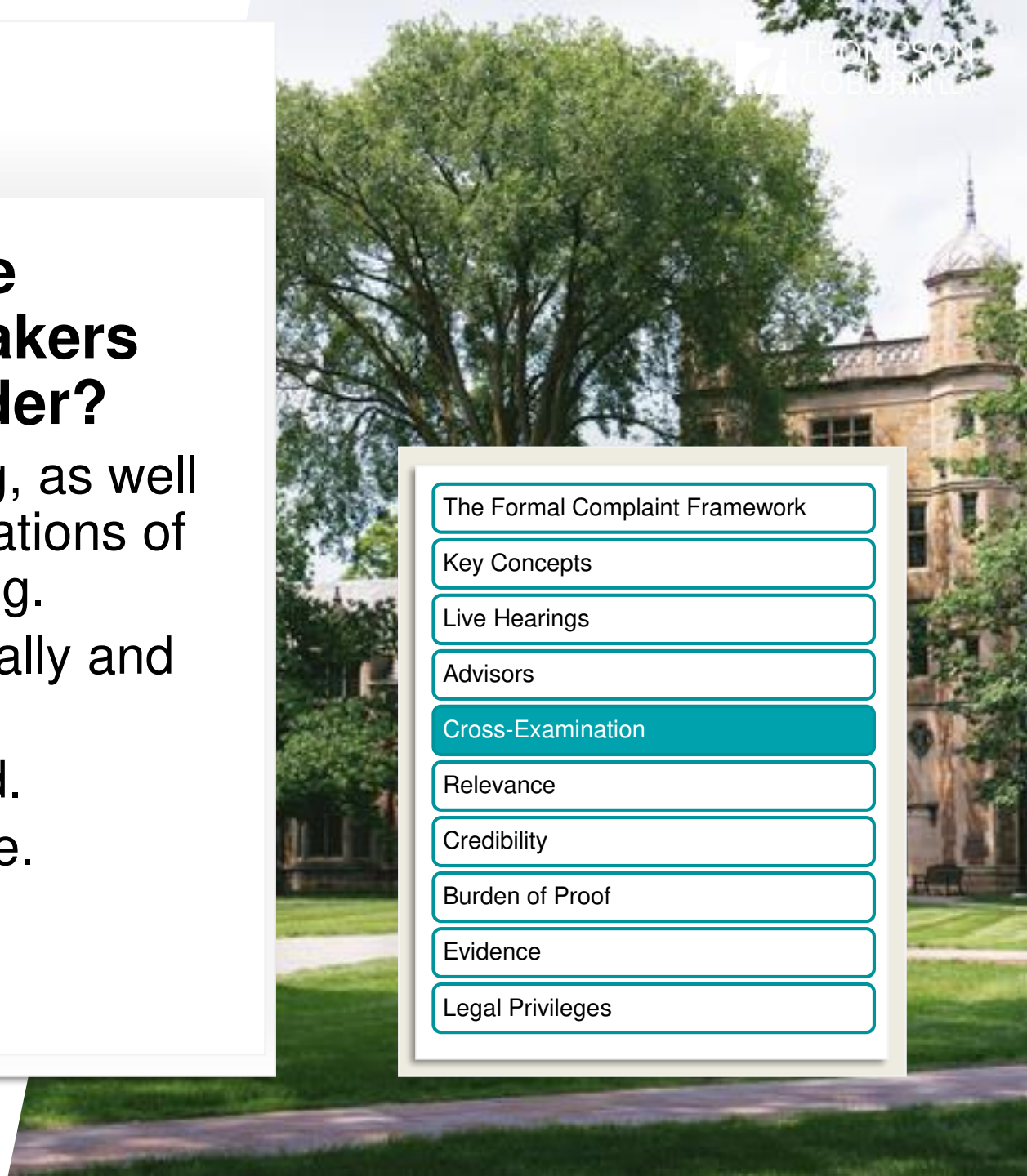
Adversarial Advisors

Assuming one or both advisors are attorneys, how should decision-makers and presiding officers maintain order?

- Clearly explain the order of proceeding, as well as any other requirements and expectations of each party at the outset of each hearing.
- Enforce rules of order or decorum equally and compassionately.
- Take breaks and ask for help if needed.
- Do not be afraid to adjourn or postpone.



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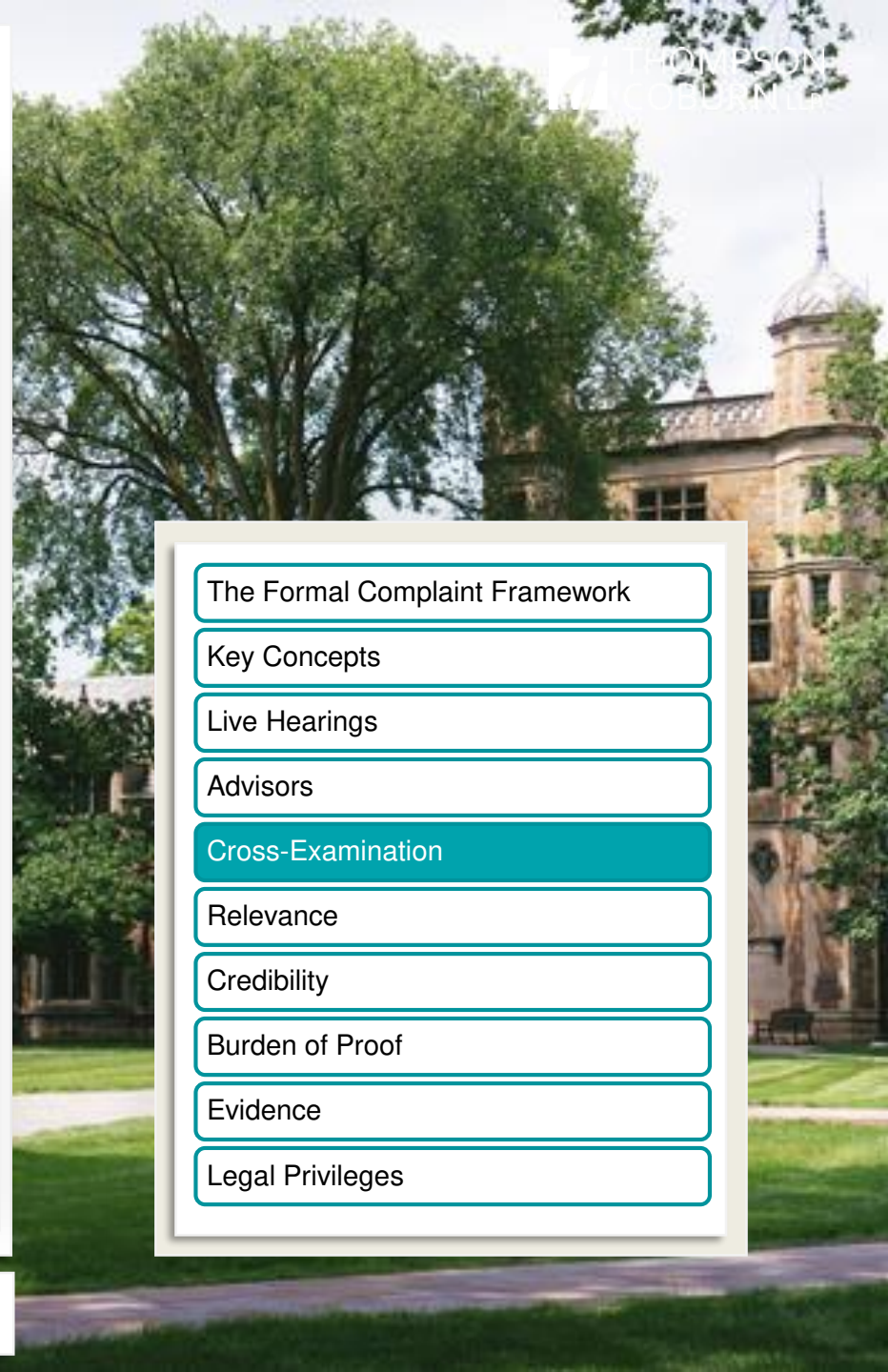
Refusing Cross-Examination

If a party or witness does not submit to cross-examination at the live hearing, the adjudicator must not rely on any statement of that party or witness in reaching a determination regarding responsibility.

- However, the adjudicator cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.



34 CFR 106.45(b)(6) (August 14, 2020).

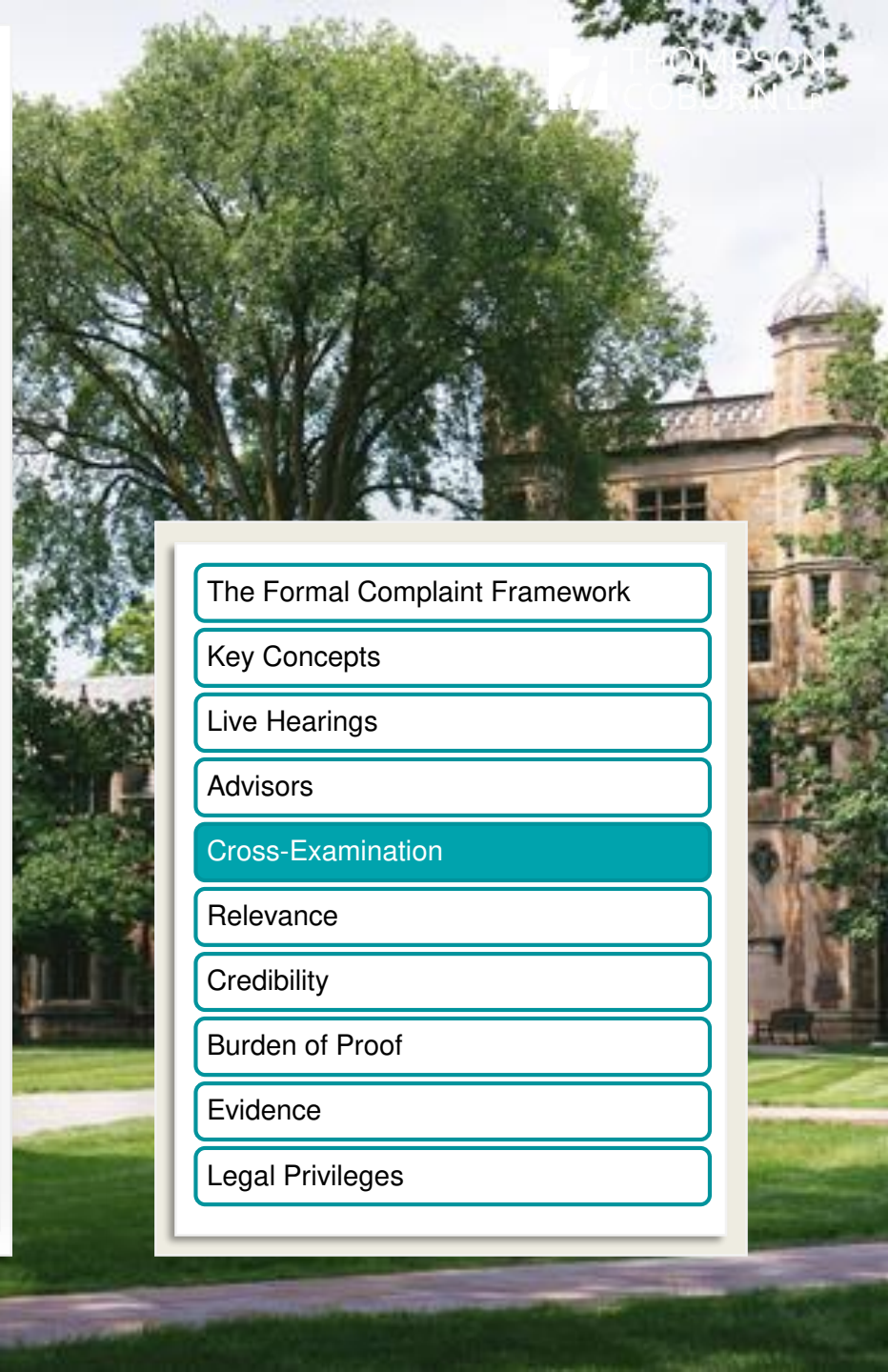
Examining Cross-Examination

What does "submit to cross-examination" mean?

- Answering cross-examination questions that are relevant.

Does the same "exclusion of statement" rule apply to a party or witness's refusal to answer questions posed by the adjudicator?

- No, because questions posed by a neutral fact finder is not cross-examination.
- "If a party or witness refuses to respond to a decision-maker's questions, the decision-maker is not precluded from relying on that party or witness's statements."

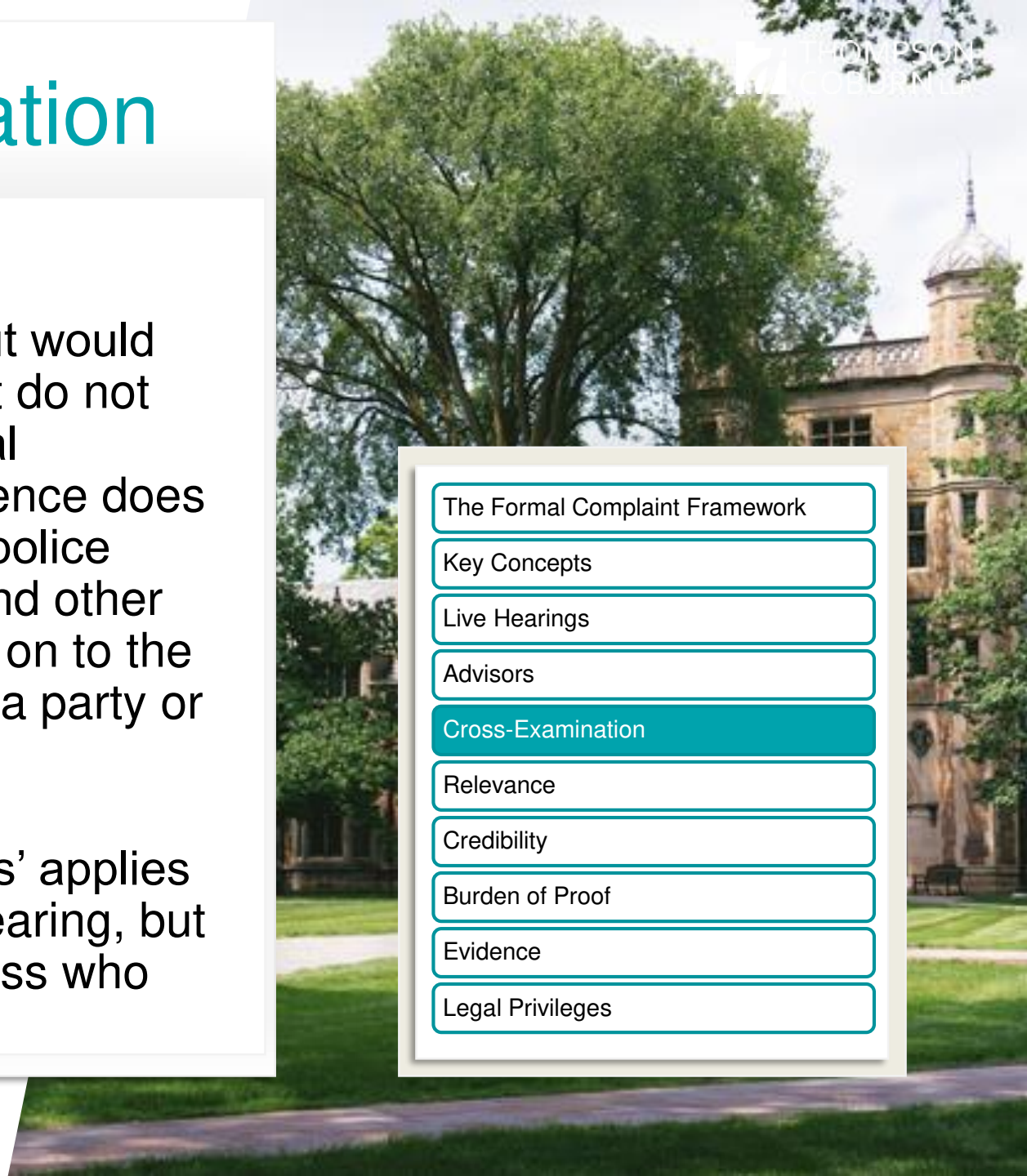


85 Fed. Reg. 30349 (May 19, 2020).

Examining Cross-Examination

What does "statements" mean?

- "'Statements' has its ordinary meaning, but would not include evidence (such as videos) that do not constitute a person's intent to make factual assertions, or to the extent that such evidence does not contain a person's statements. Thus, police reports, SANE reports, medical reports, and other documents and records may not be relied on to the extent that they contain the statements of a party or witness who has not submitted to cross-examination."
- "The prohibition on reliance on 'statements' applies not only to statements made during the hearing, but also to any statement of the party or witness who does not submit to cross-examination."

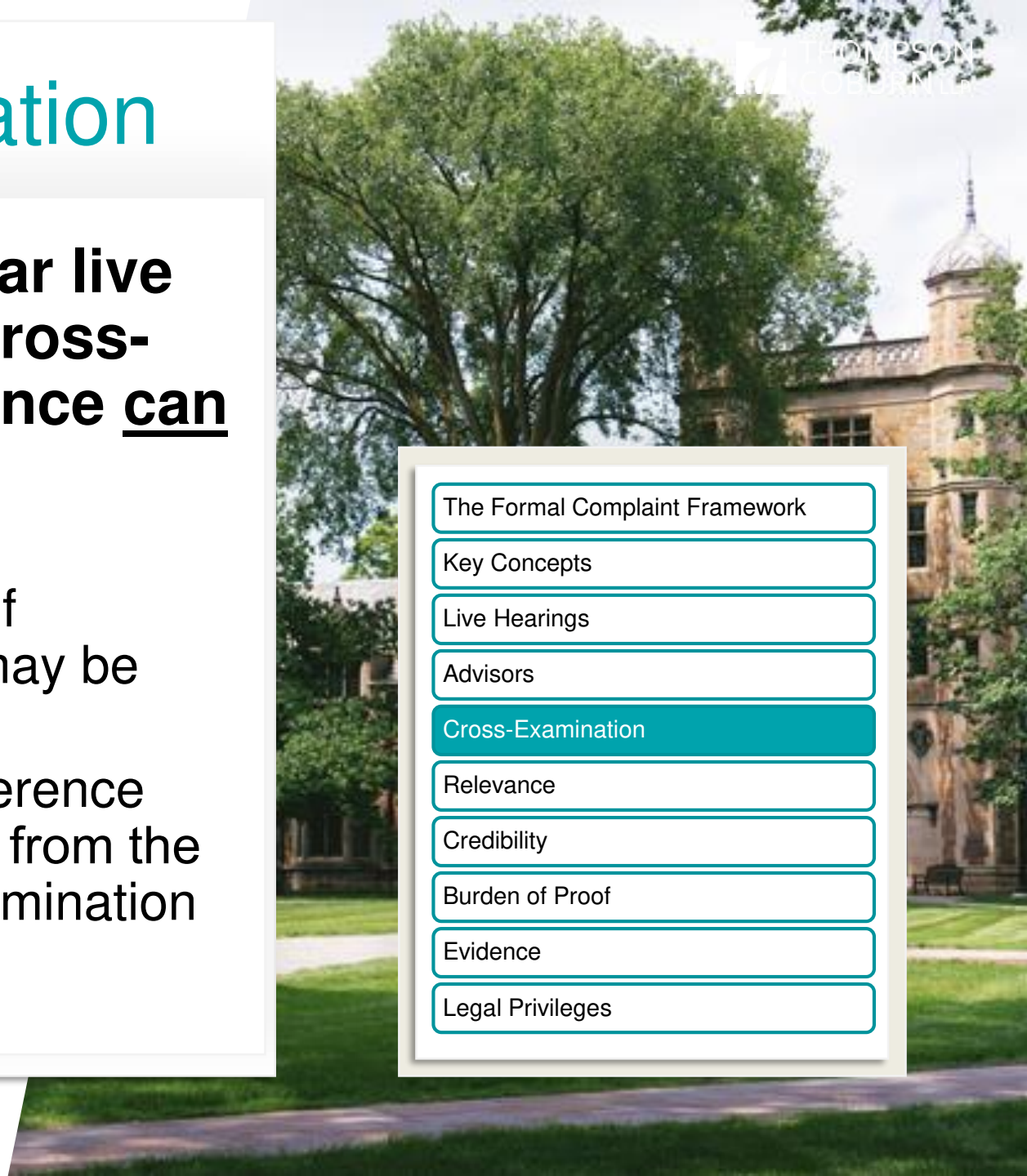


85 Fed. Reg. 30335 (May 19, 2020).

Examining Cross-Examination

If a party or witness does not appear live at a hearing or refuses to answer cross-examination questions, what evidence <u>can</u> be considered?

- "Statements" may not be considered.
- Other evidence that does not consist of statements, such as video evidence, may be used to reach a determination.
- Decision-maker must not draw any inference about the party's or witness's absence from the hearing or refusal to answer cross-examination questions.



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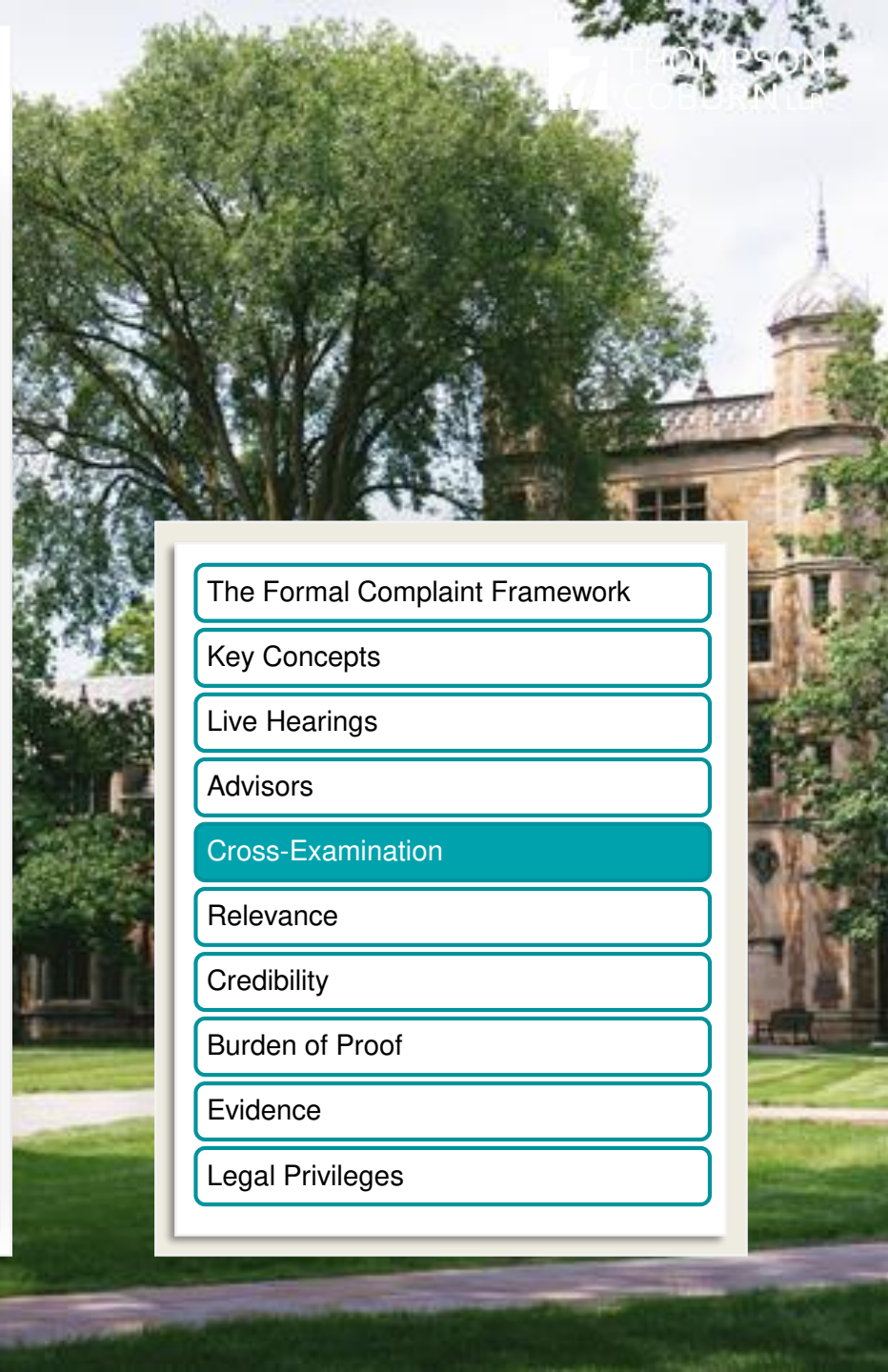
Examining Cross-Examination

Can a decision-maker ask questions of the parties and witnesses?

- Yes.

When is an advisor's cross-examination "on behalf of that party" satisfied?

- "An advisor's cross-examination 'on behalf of that party' is satisfied where the advisor poses questions on a party's behalf, which means that an assigned advisor could relay a party's own questions to the other party or witness, and no particular skill or qualification is needed to perform that role."



85 Fed. Reg. 30340 (May 19, 2020).

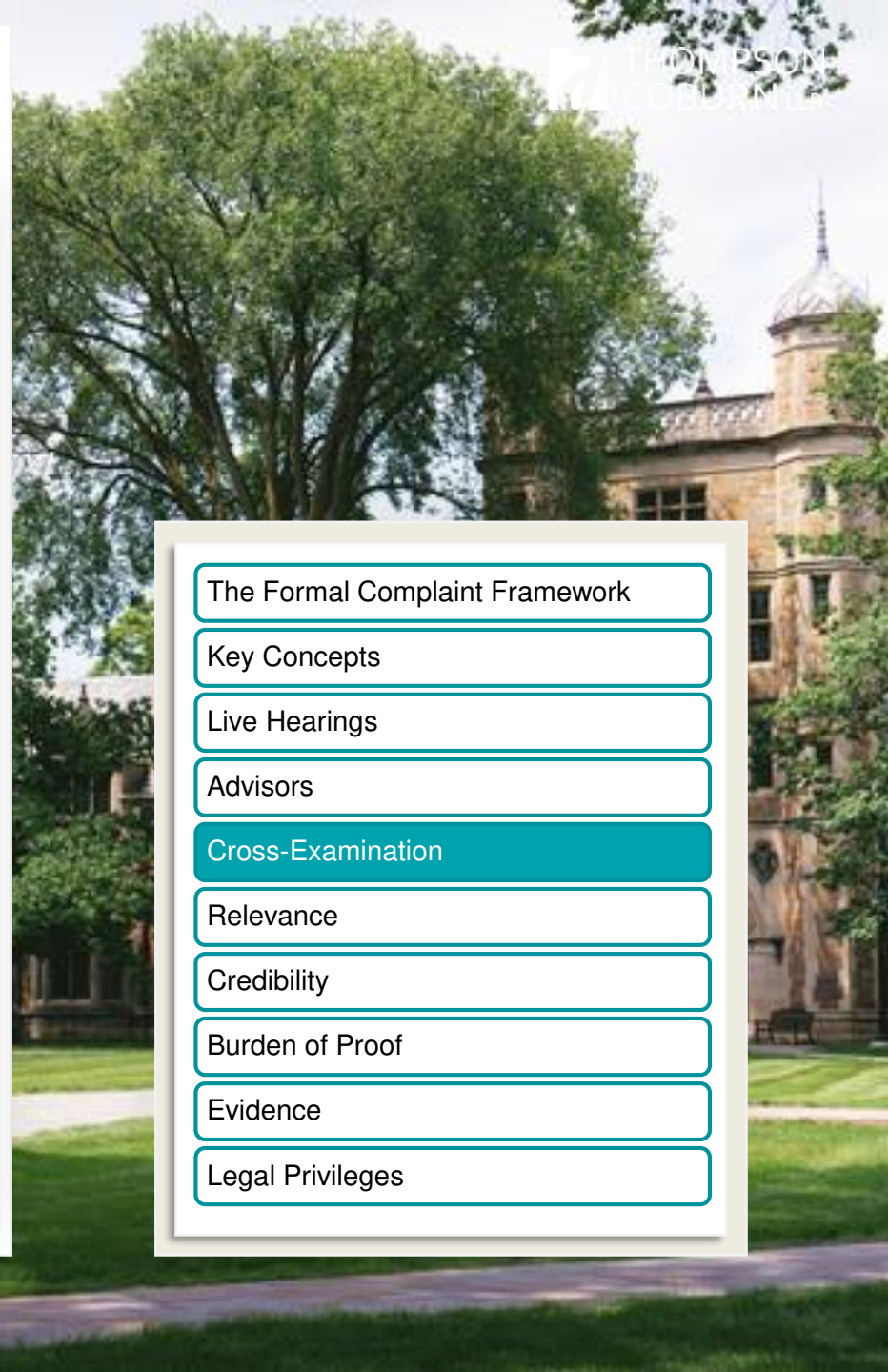
Examining Cross-Examination

Can a party's advisor appear and conduct cross-examination even when the party whom they are advising does not appear?

- Yes.

What happens where a party does not appear but the party's advisor of choice <u>does</u>?

- "…a recipient-provided advisor must still cross-examine the other, appearing party on behalf of the non-appearing party, resulting in consideration of the appearing party's statements but not the non-appearing party's statements (without any inference being drawn based on the non-appearance). Because the statements of the appearing party were tested via cross-examination, a fair, reliable outcome can result in such a situation."



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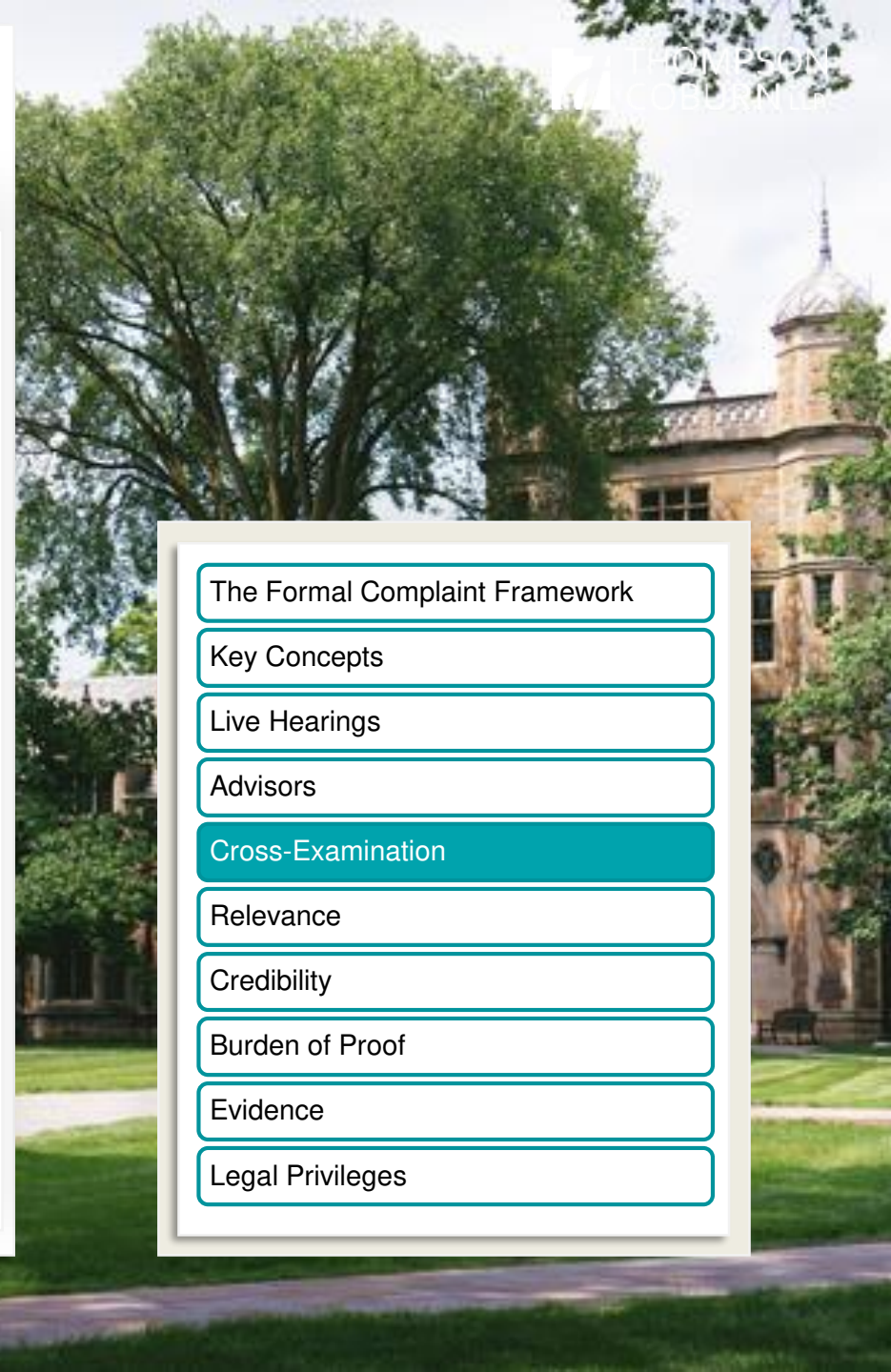
85 Fed. Reg. 30346 (May 19, 2020).

Managing a Live Hearing

If a party does not appear or submit to cross-examination, can the party's family member's or friend's recount the statement of the party?

- No. "Even if the family member or friend did appear and submit to cross-examination, where the family member's or friend's testimony consists of recounting the statement of the party, and where the party does not submit to cross-examination, it would be unfair and potentially lead to an erroneous outcome to rely on statements untested via cross-examination."



- The Formal Complaint Framework
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- **Cross-Examination**
- Relevance
- Credibility
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- Legal Privileges

85 Fed. Reg. 30347 (May 19, 2020).

Relevance

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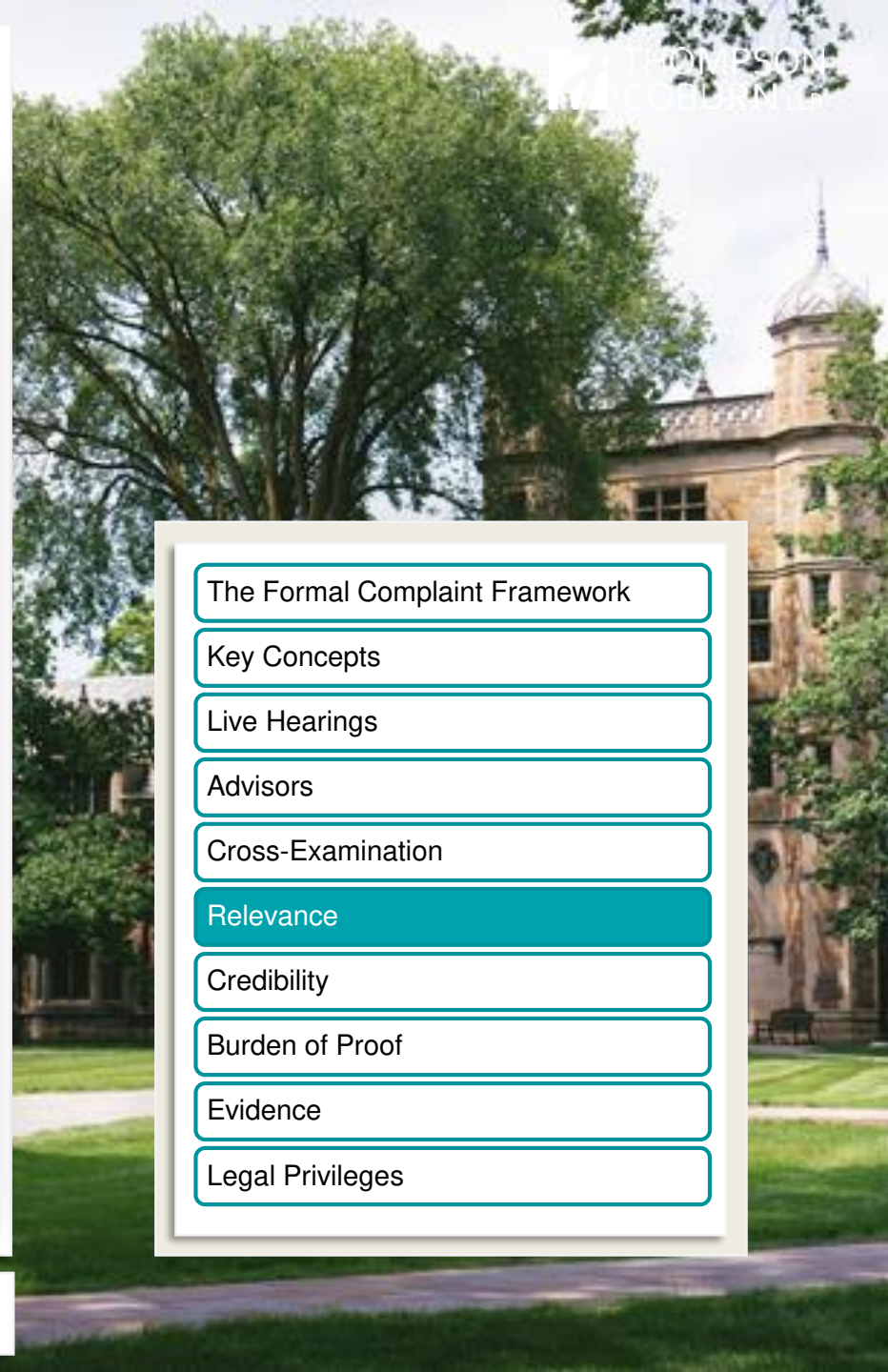
Relevance

Only relevant cross-examination and other questions, including those challenging credibility, may be asked of a party or witness.

Before a party or witness answers a cross-examination or other question, the adjudicator must determine whether the question is relevant, and explain any decision to exclude a question as not relevant.



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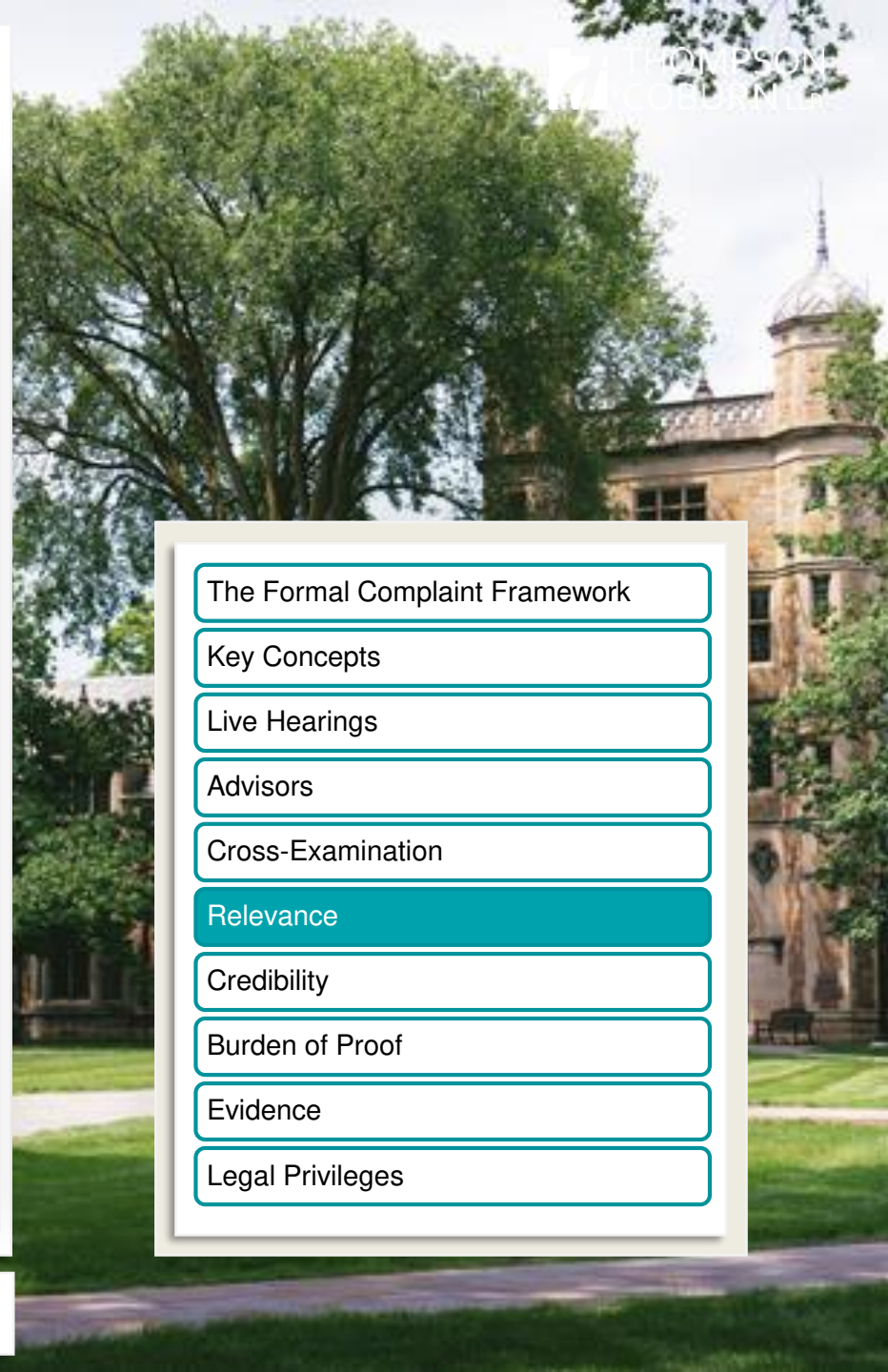
34 CFR 106.45(b)(6) (August 14, 2020).

Relevance

Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence:

- are offered to prove that someone other than the respondent committed the alleged conduct; or
- concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.



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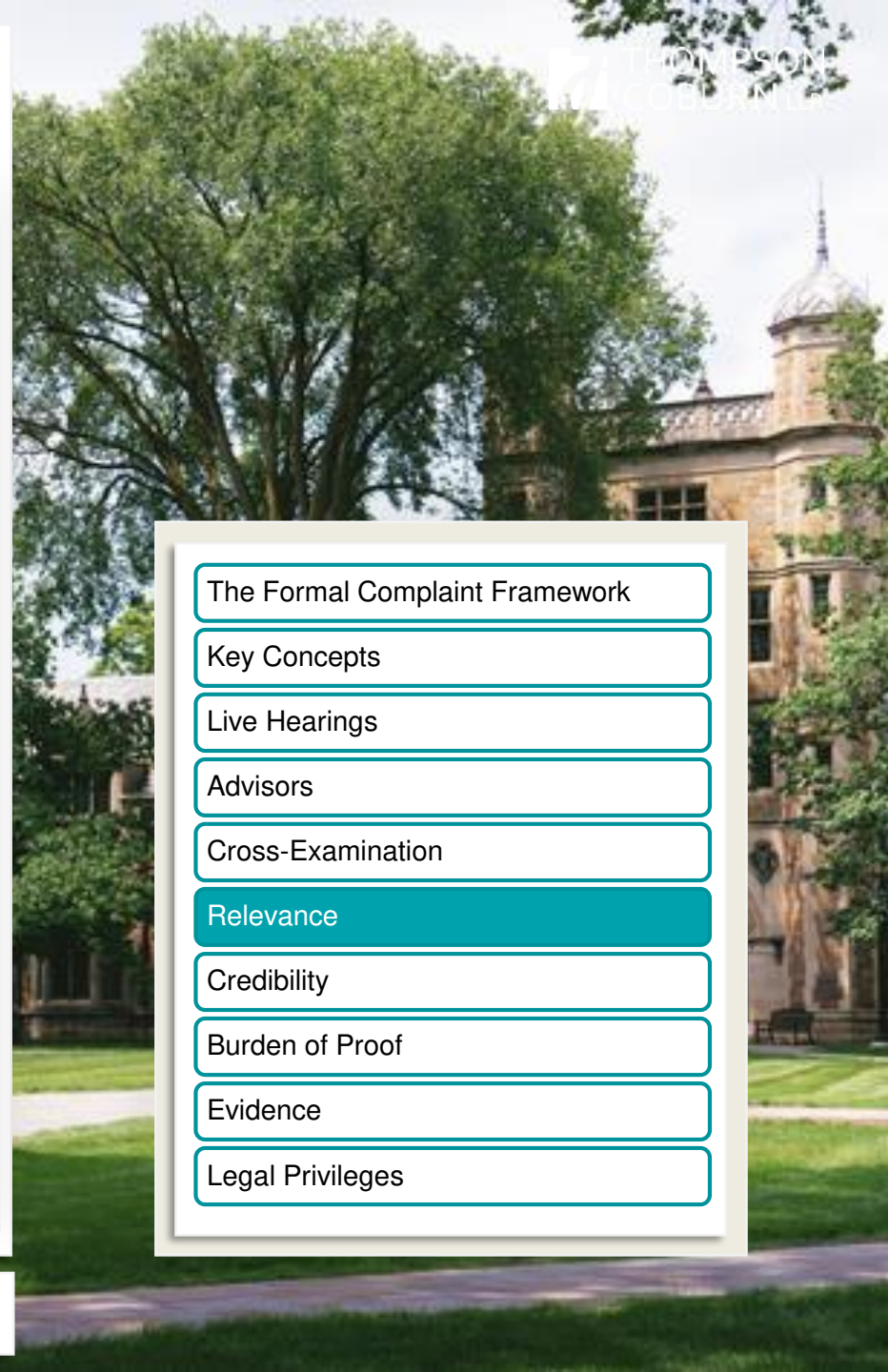
34 CFR 106.45(b)(6) (August 14, 2020).

Relevance

What is required of the decision-maker during a relevance determination?

- Lengthy or complicated explanation not required. "[I]t is sufficient, for example, for a decision-maker to explain that a question is irrelevant because the question calls for prior sexual behavior information without meeting one of the two exceptions, or because the question asks about a detail that is not probative of any material fact concerning the allegations."



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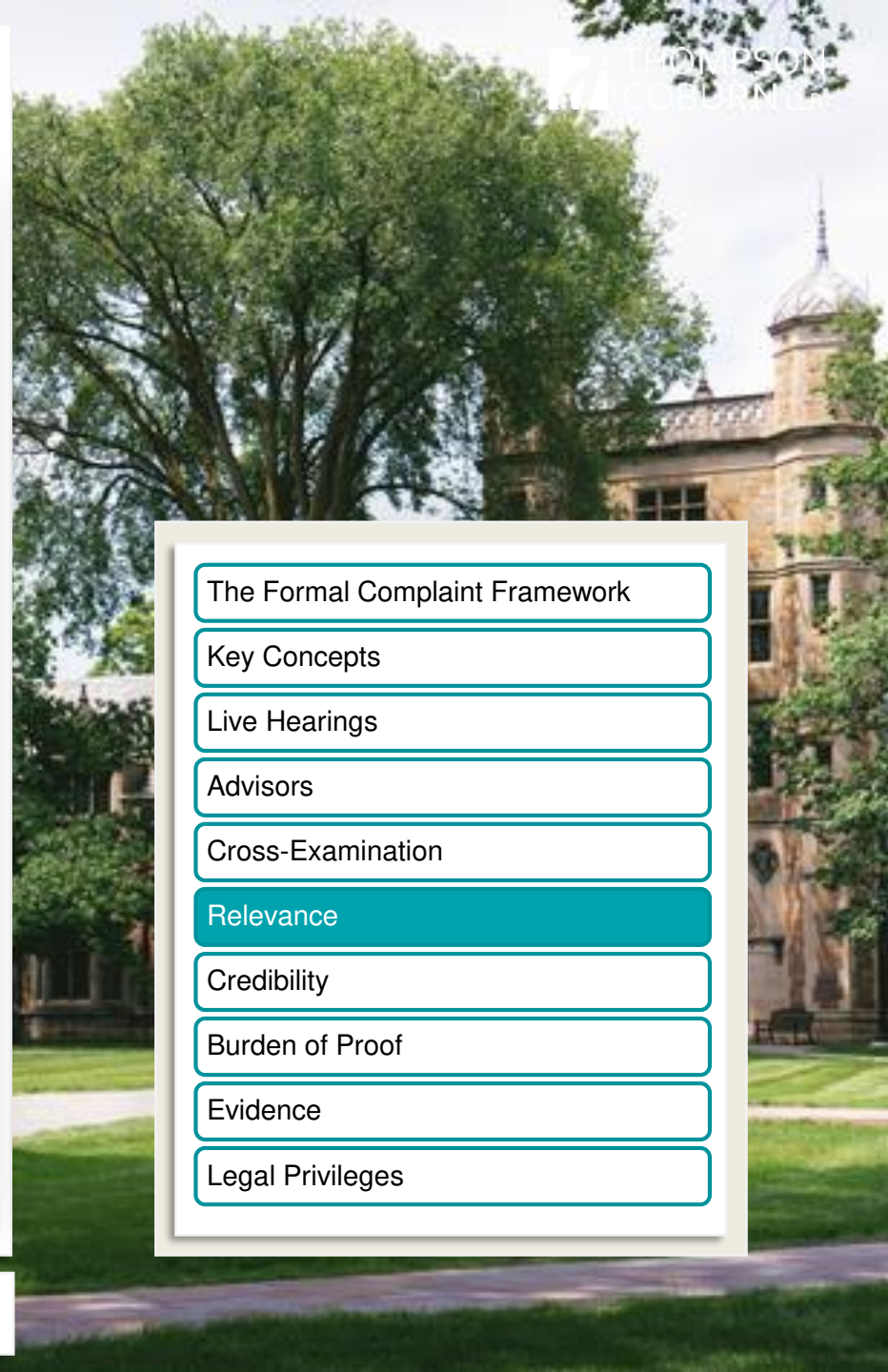
85 Fed. Reg. 30343 (May 19, 2020).

Relevance

Can a school adopt a rule (applied equally to both parties) that does, or does not, give parties or advisors the right to discuss relevance determinations with the decision-maker during the hearing?

- "If a recipient believes that arguments about a relevance determination during a hearing would unnecessarily protract the hearing or become uncomfortable for parties, the recipient may adopt a rule that prevents parties and advisors from challenging the relevance determination (after receiving the decision-maker's explanation) during the hearing."



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85 Fed. Reg. 30343 (May 19, 2020).

Credibility

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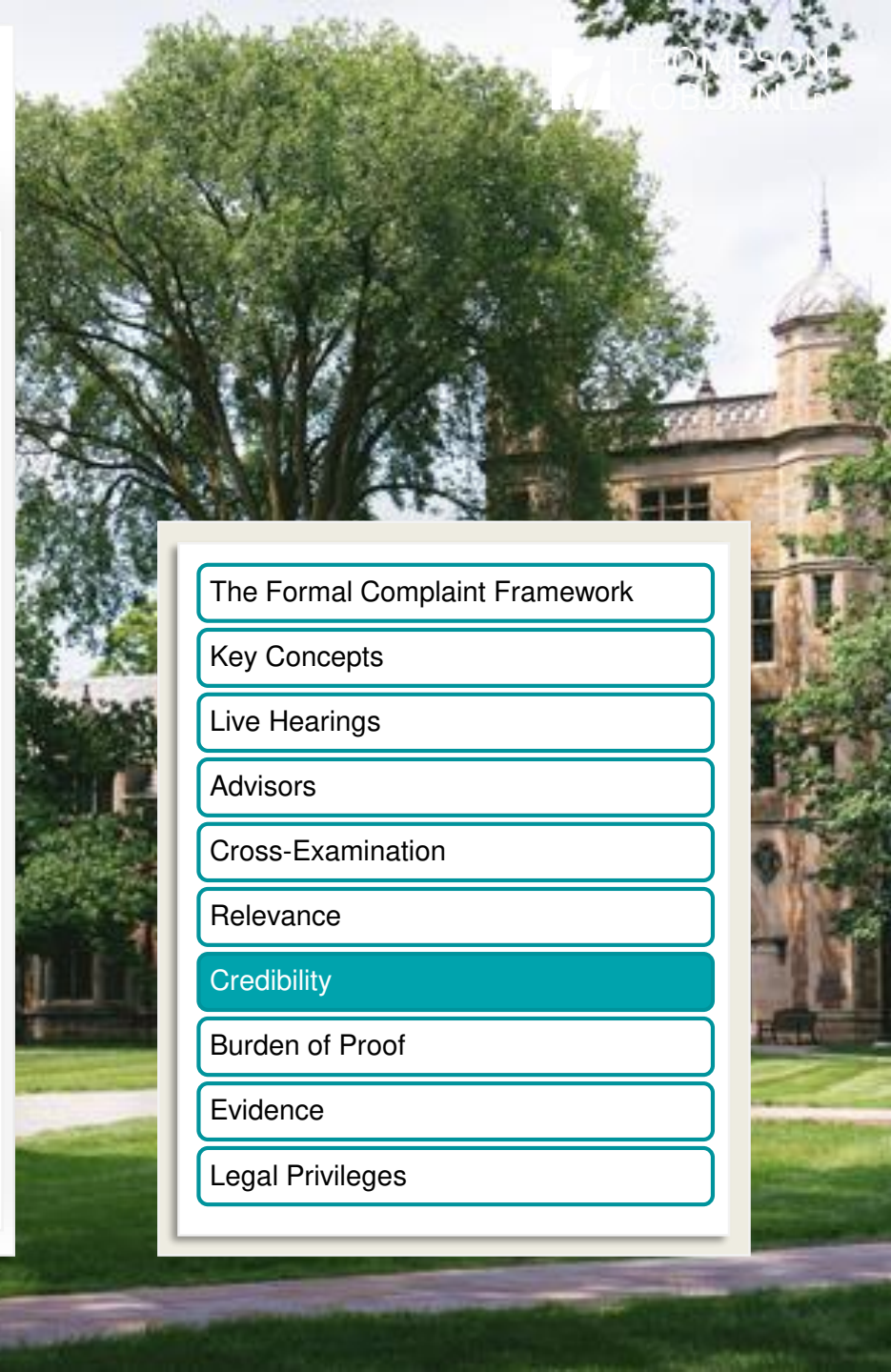
Managing a Live Hearing

Can relevant character evidence or evidence of prior bad acts on cross-examination be excluded?

- No. "…where a cross-examination question or piece of evidence is relevant, but concerns a party's character or prior bad acts, under the final regulations the decision-maker cannot exclude or refuse to consider the relevant evidence, but may proceed to objectively evaluate that relevant evidence by analyzing whether that evidence warrants a high or low level of weight or credibility, so long as the decision maker's evaluation treats both parties equally by not, for instance, automatically assigning higher weight to exculpatory character evidence than to inculpatory character evidence."



85 Fed. Reg. 303337 (May 19, 2020).

Burden of Proof

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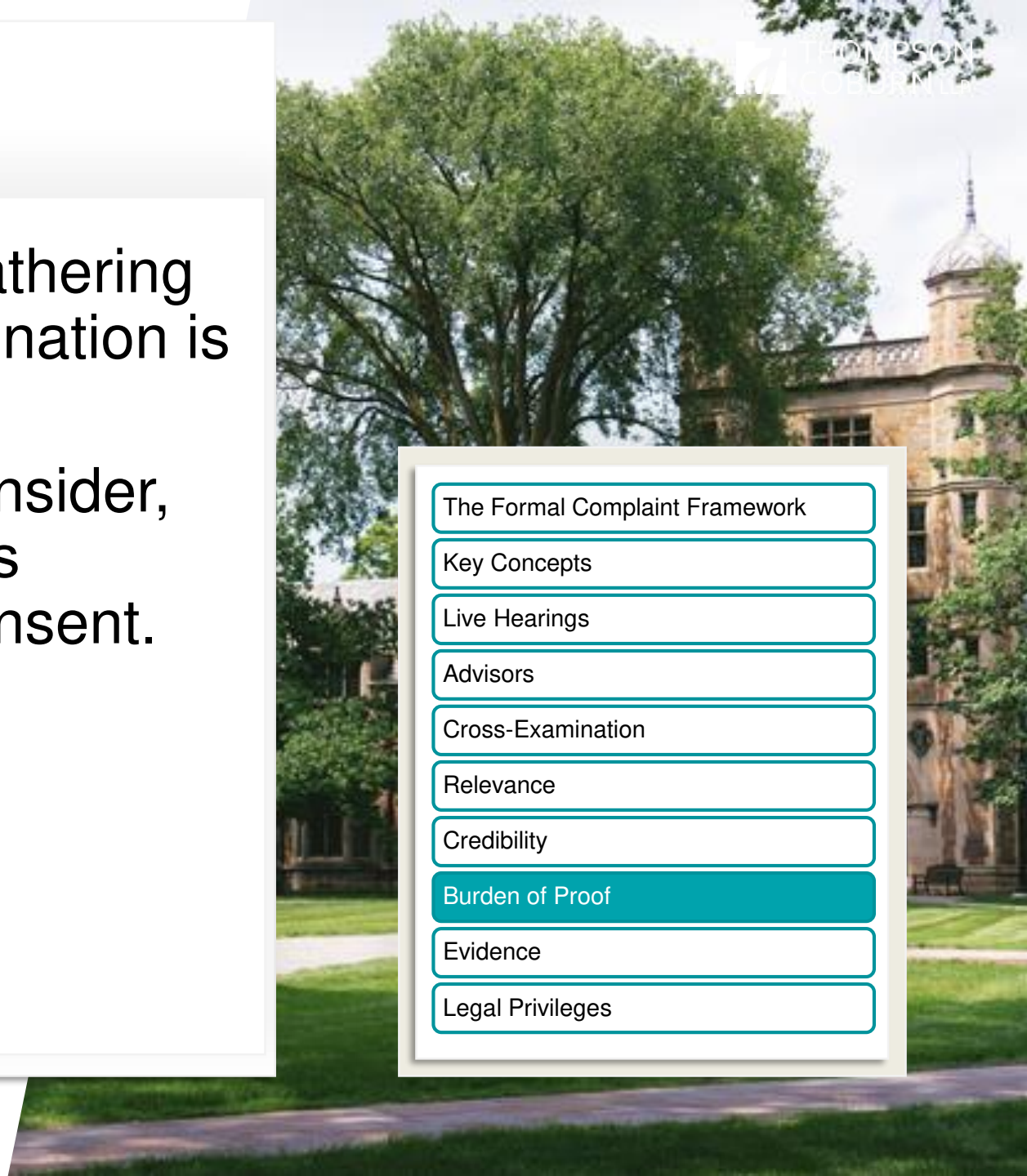
Burden of Proof

The burden of proof and burden of gathering evidence sufficient to reach a determination is on the institution.

- The institution may not access, consider, disclose, or otherwise use a party's medical records without written consent.



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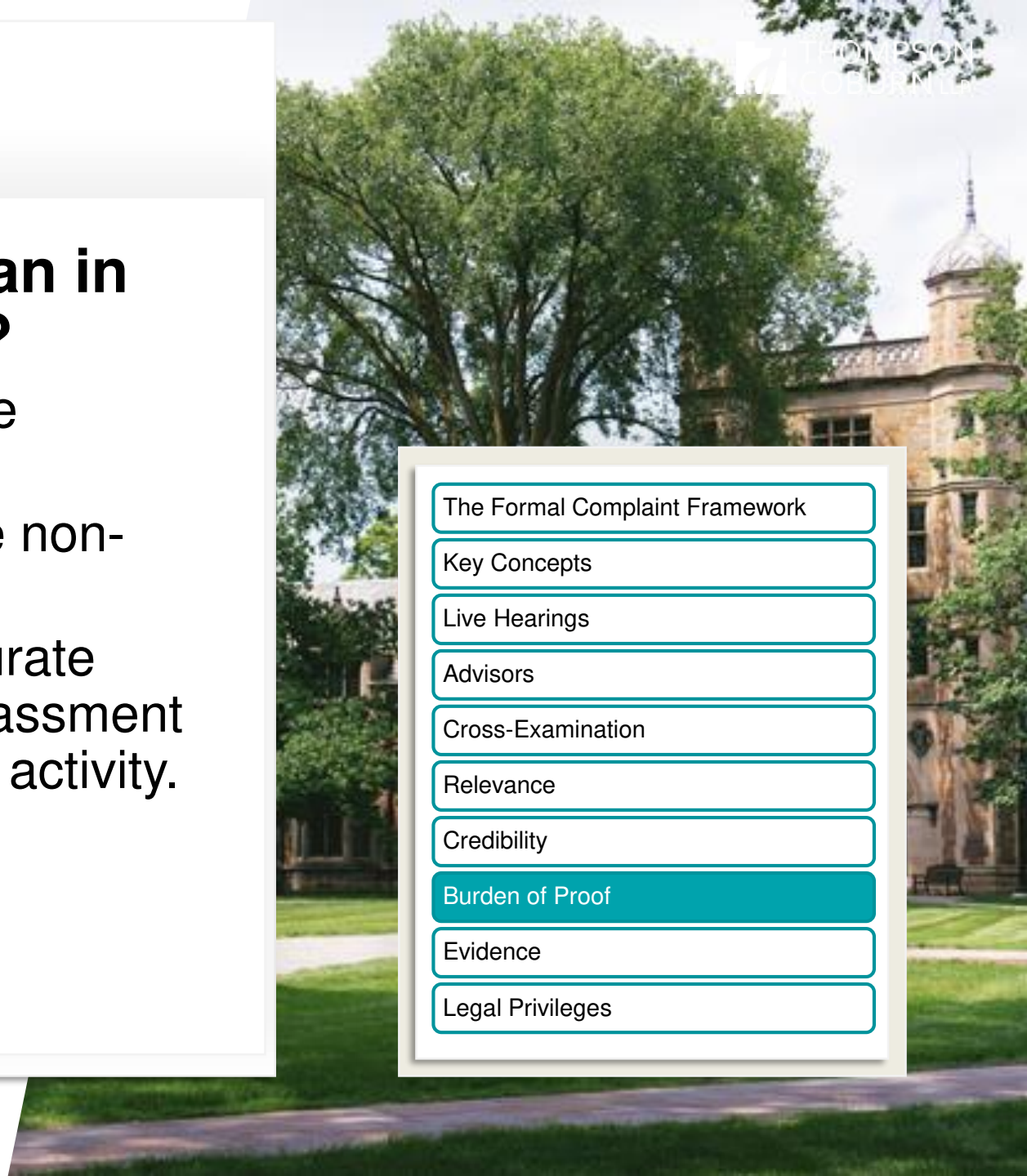
Burden of Proof

What does the burden of proof mean in terms of reaching a determination?

- Complainants are not required to prove responsibility.
- Respondents are not required to prove non-responsibility.
- The institution is required to draw accurate conclusions about whether sexual harassment occurred in an educational program or activity.



Evidence

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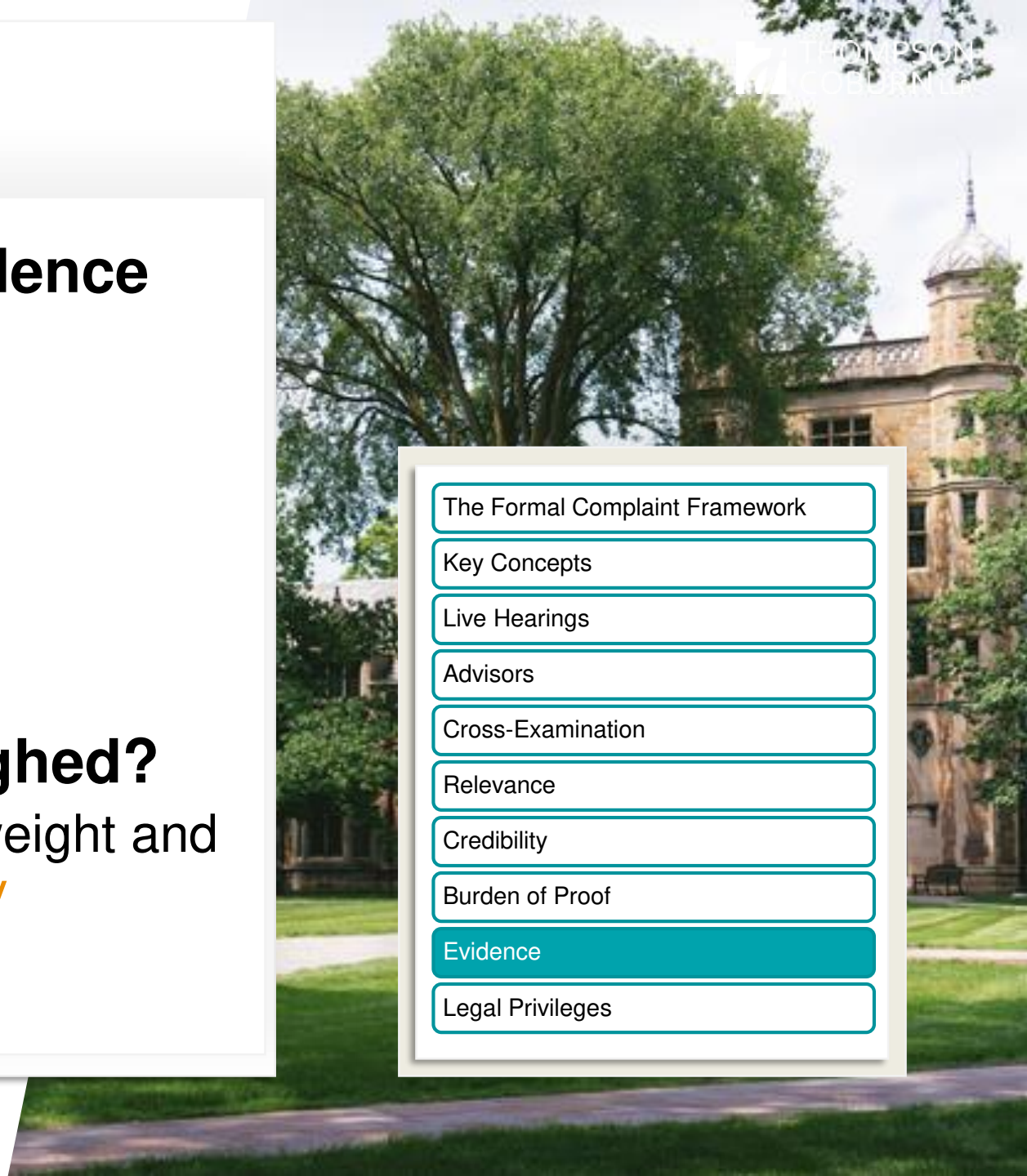
Types of Evidence

What are the different types of evidence that may be presented?

- Direct
- Circumstantial
- Hearsay
- Character Evidence
- Prior Bad Acts

How can relevant evidence be weighed?

- Institutions can have rules regarding weight and credibility. Admissibility is governed by relevance.



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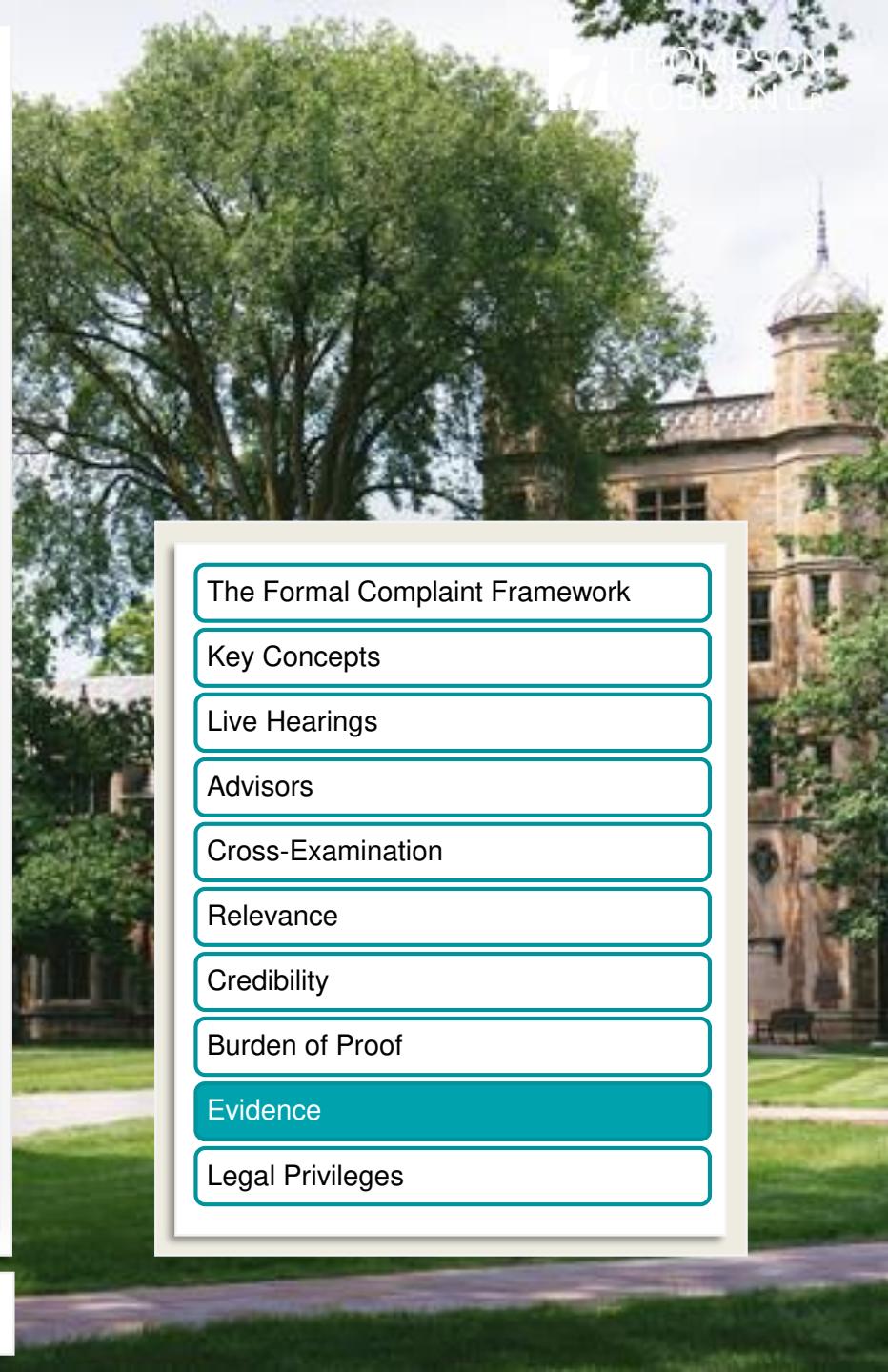
Access to Evidence

Throughout the hearing, institutions must afford both parties equal opportunity to review and inspect any evidence that:

- was obtained as part of investigation; and
- is directly related to the allegations.

This includes evidence upon which the school does not intend to rely in reaching a determination, and inculpatory or exculpatory evidence, whether obtained from a party or other source.



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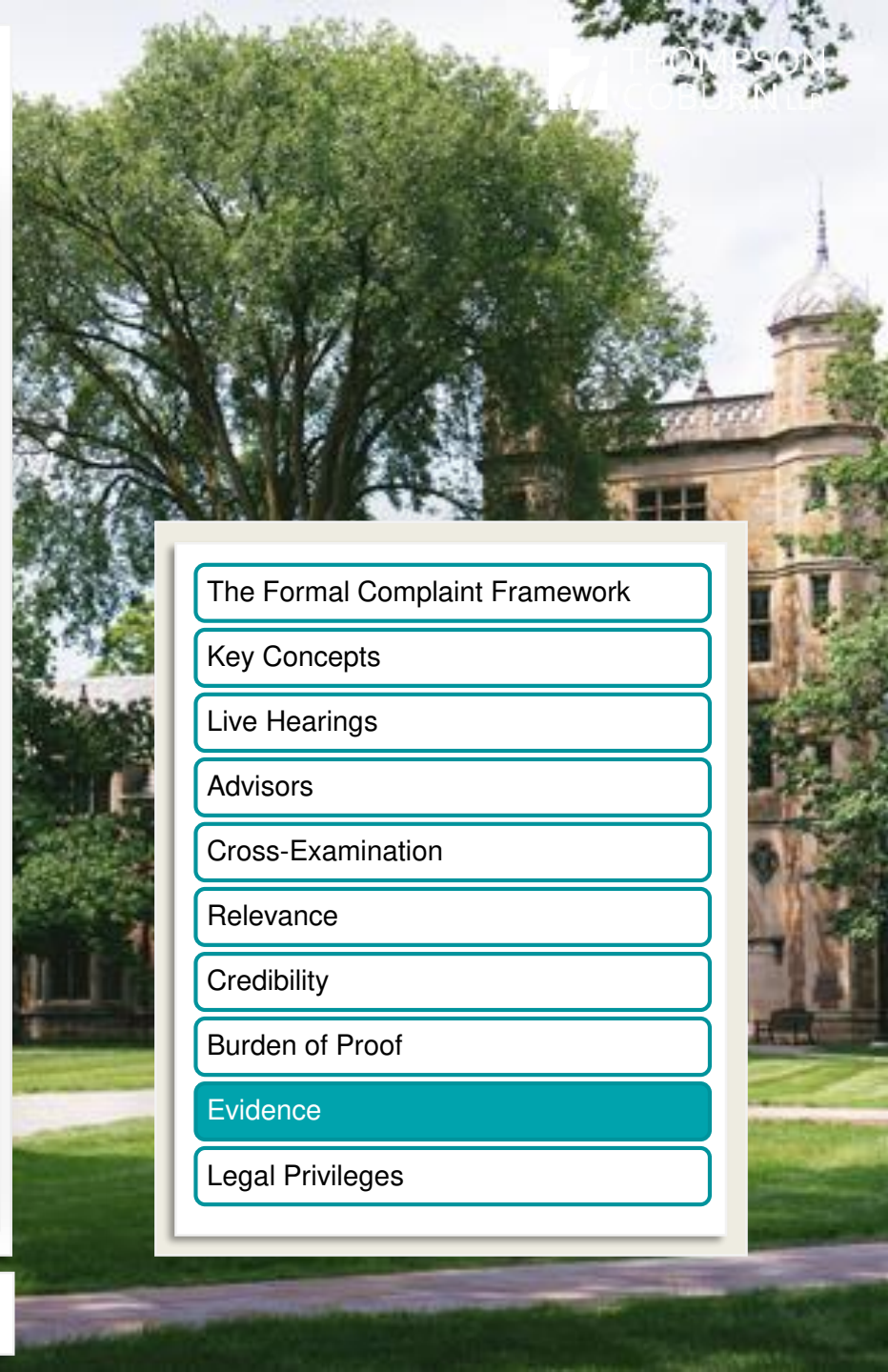
Timing of Access

Generally	Prior to issuing investigative report	10 days prior to hearing or other determination	At and during any hearing
• Must provide access early enough that each party can meaningfully respond to the evidence prior to conclusion of the investigation.	• Must send parties all evidence subject to inspection and review and afford at least 10 days to submit a written response.	• Must send investigative report to parties for review and written response.	• Must make all evidence available to parties' and afford equal opportunity to review, including for purposes of cross-ex.



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34 CFR 106.45(b)(5) (August 14, 2020).

Legal Privileges

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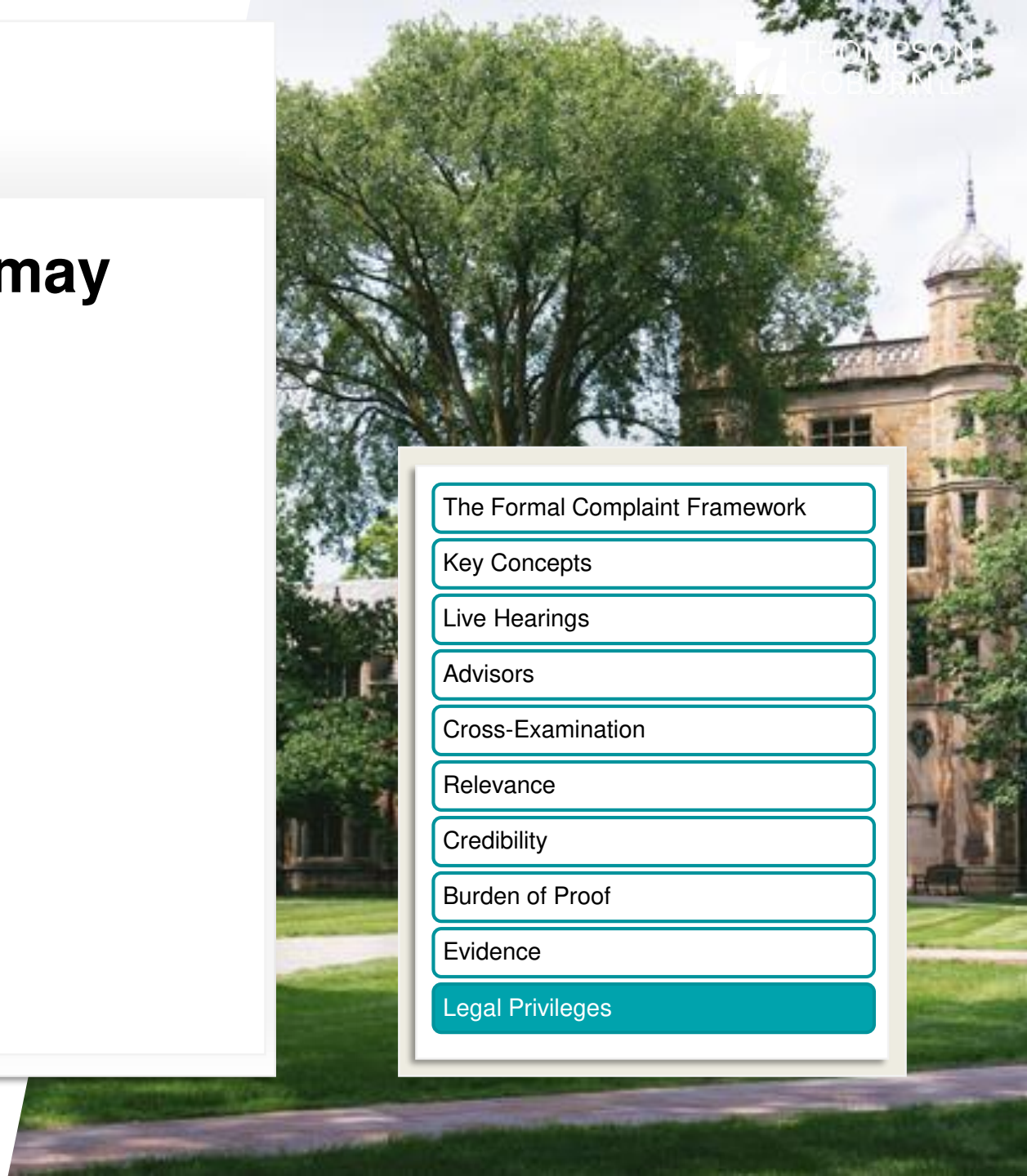
Legal Privileges

What are legal privileges and how may they arise at the hearing?

- Attorney – Client
- Priest – Penitent
- Doctor – Patient
- Spousal



Resources

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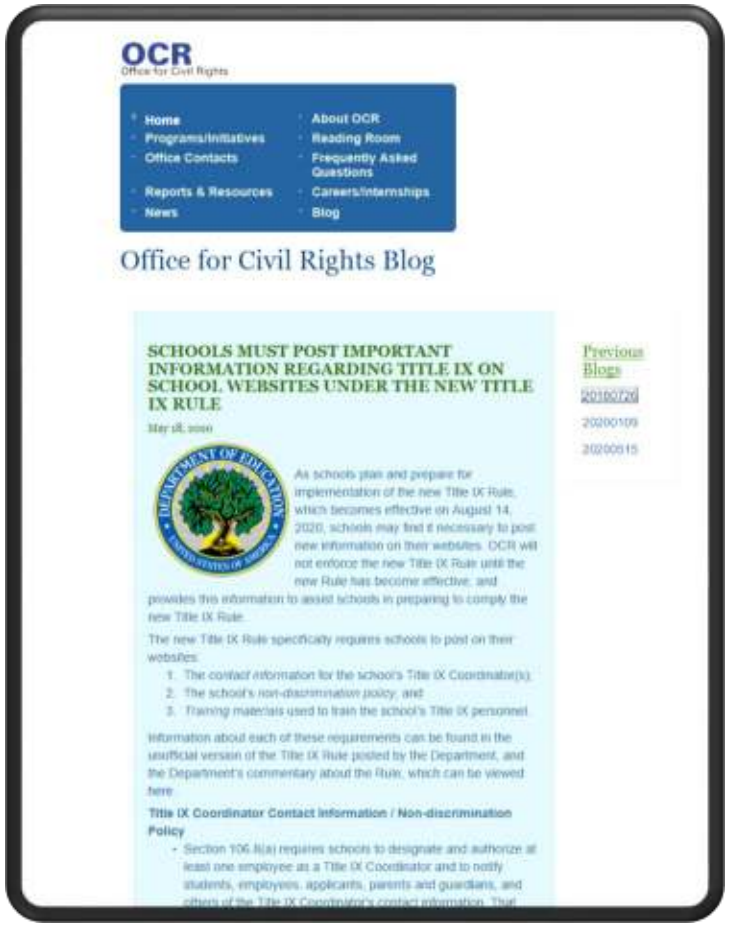
Office of Civil Rights

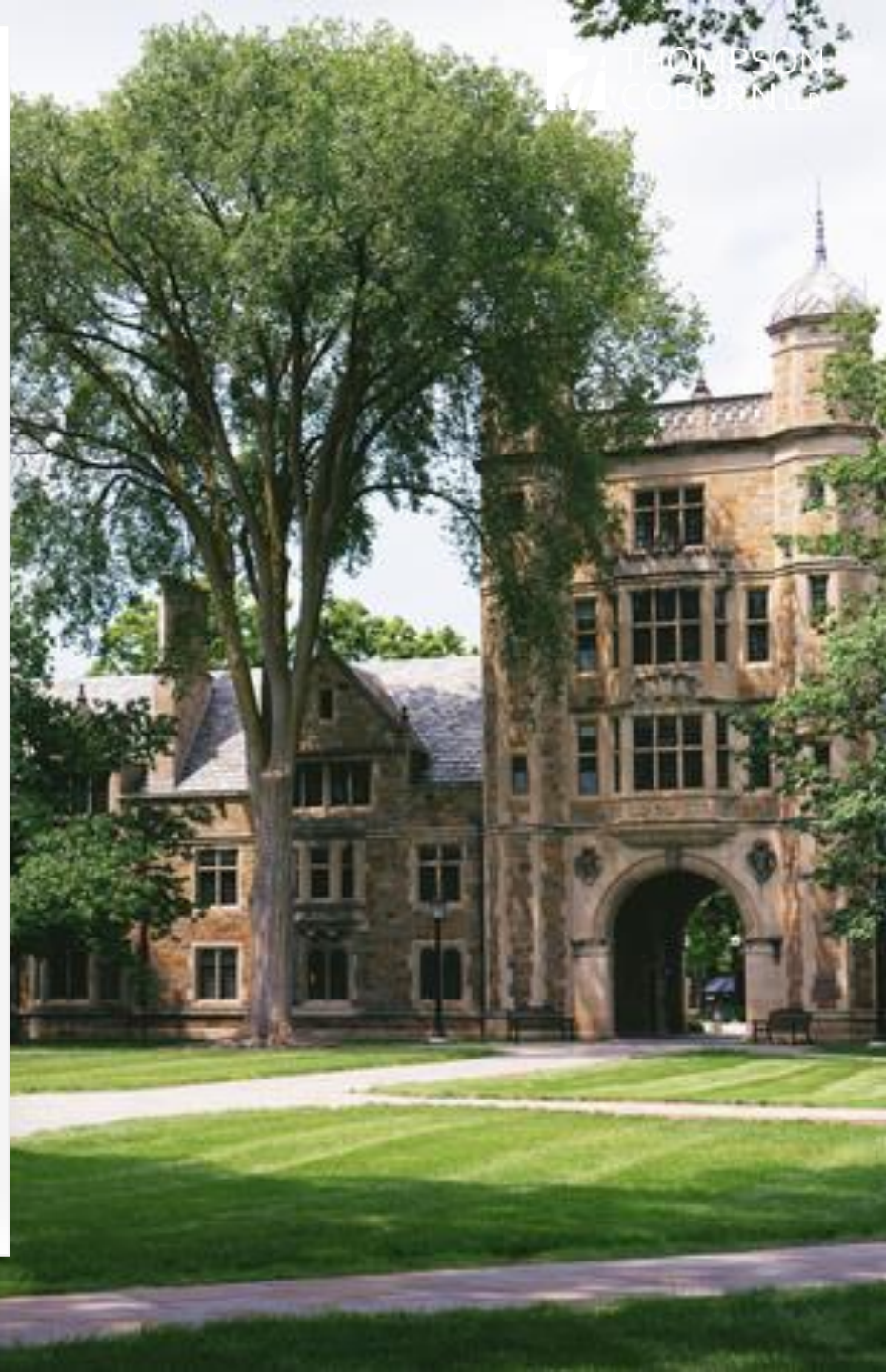
OCR Title IX Blog

- Will include new guidance on a rolling basis.

OCR Email Address

- OPEN@ed.gov
- May be used for submitting inquiries regarding the new Title IX rule.





Title IX Rule Comparison

Title IX Rule Comparison

- Shows the changes the new rule will make to 34 C.F.R. Part 106 as of August 14, 2020.

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Comparison Showing Changes to USED Title IX Rule Effective August 14, 2020

Last Updated: May 20, 2020

On May 19, 2020, the U.S. Department of Education published the official version of its new Title IX regulation in the Federal Register. This new rule constitutes the first significant revision of the Department's Title IX regulations concerning sexual harassment in over 40 years. Among other things, the new rule revises the scope of a school's responsibility for managing incidents of sex discrimination, codifies procedural requirements for the resolution of Title IX complaints, and defines key concepts in the law. The effective date of the new rule is August 14, 2020. Below, we provide a comparison that shows the changes the new rule will make to 34 C.F.R. Part 106 as of August 14, 2020. We have created this document by comparing the existing rule to the changes set forth in the Federal Register, noted above.

Institutions with questions regarding the new Title IX rule are welcome to contact Aaron Lacey at (314) 552-6405 or alacey@thompsoncoburn.com. Aaron Lacey is the leader of Thompson Coburn's Higher Education practice, host of the firm's popular Higher Education Webinar Series, and editorial director of REGucation, the firm's higher education law and policy blog.

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Please note that the purpose of this document is to provide information on a regulatory matter and all content provided is for informational purposes only and should not be considered legal advice. The transmission of information from this document does not establish an attorney-client relationship with the reader. If you desire legal advice for a particular situation, you should consult an attorney.

Subpart A—Introduction

§106.1 Purpose and effective date.

The purpose of this part is to effectuate title IX of the Education Amendments of 1972, as amended by Pub. L. 93-568, 88 Stat. 1855 (except sections 904 and 906 of those Amendments) which is designed to eliminate (with certain exceptions) discrimination on the basis of sex in any education program or activity receiving Federal financial assistance, whether or not such program or activity is offered or sponsored by an educational institution as defined in this part. This part is also intended to effectuate section 844 of the Education Amendments of 1974, Pub. L. 93-380, 88 Stat. 484. The effective date of this part shall be July 21, 1975.

§106.2 Definitions.

As used in this part, the term:

(a) *Title IX* means title IX of the Education Amendments of 1972, Pub. L. 92-318, as amended by section 3 of Pub. L. 93-568, 88 Stat. 1855, except sections 904 and 906 thereof; 20 U.S.C. 1681, 1682, 1683, 1685, 1686.

(b) *Department* means the Department of Education.

(c) *Secretary* means the Secretary of Education.

(d) *Assistant Secretary* means the Assistant Secretary for Civil Rights of the Department.

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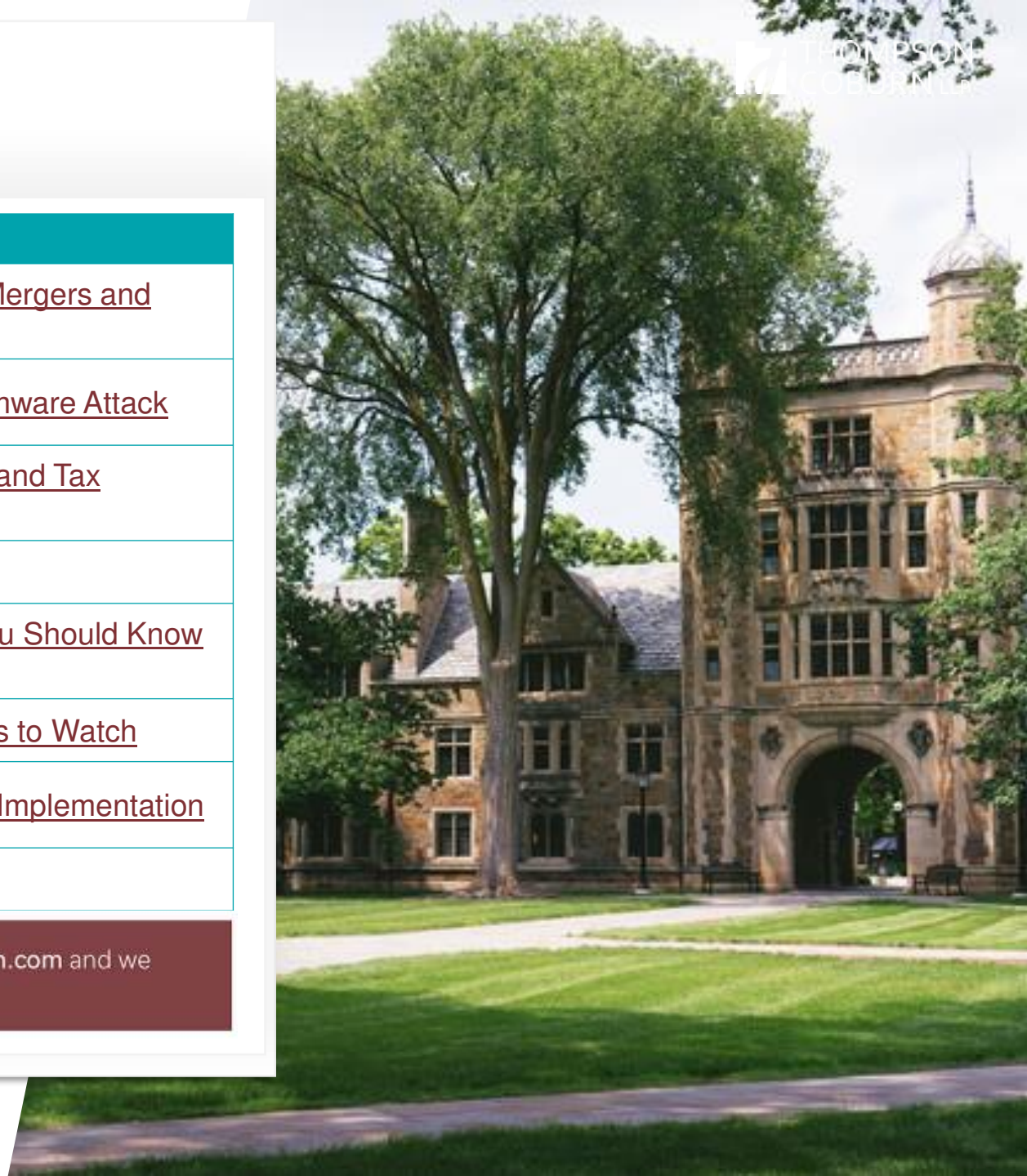
Higher Ed Webinar Series

2019 | 2020 Series Calendar	
August 2019	Examining the ED Approval Process for Higher Ed Mergers and Acquisitions
September 2019	Colleges Held for Ransom: Responding to a Ransomware Attack
October 2019	Merging Institutions of Higher Education: Corporate and Tax Considerations
December 2019	A Year-End Roundup of ED Rulemaking Activity
February 2020	Recent Court Decisions in Student Disputes That You Should Know About
March 2020	Higher Education & Immigration: Five Evolving Areas to Watch
April 2020	The CARES Act for Higher Education: Strategy and Implementation
May 2020	ED's New Title IX Rule: A Detailed Examination

If you would like to register for our webinars, email **srichter@thompsoncoburn.com** and we will send you a link as we open each webinar for registration.



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Webinars on Demand

TCLE(123)

Overview of Loss Limitations; Family Office Partnership; Sale to Spousal Grantor Trust
April 28, 2020 | Register

Better Together? Competition, Price Gouging and Other Antitrust Issues Raised by the COVID-19 Pandemic
April 21, 2020 | Register

The CARES Act for Higher Education: Strategy and Implementation
April 20, 2020 | Register

Law and Order in the Time of COVID-19: Does EPA's Temporary Enforcement Policy Apply to Me?
April 17, 2020

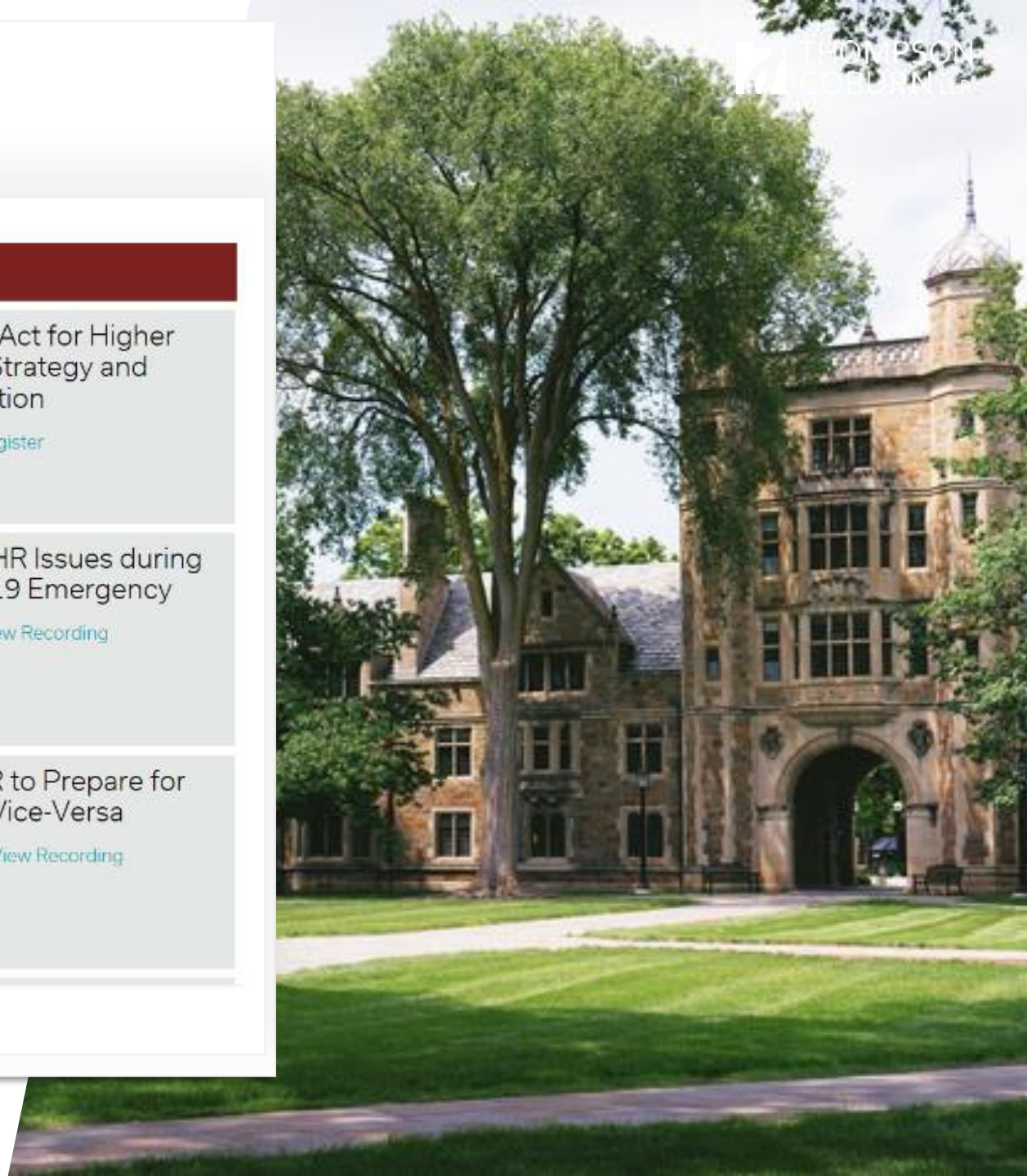
State and Federal Implementation of Industrial Hemp Laws
April 16, 2020 | View Recording

Navigating HR Issues during the COVID-19 Emergency
April 16, 2020 | View Recording

Contingency Planning for Distressed Institutions of Higher Education
April 8, 2020 | View Recording

Higher Education & Immigration: Five Evolving Areas to Watch
March 12, 2020 | View Recording

Using GDPR to Prepare for CCPA, and Vice-Versa
March 11, 2020 | View Recording



REGucation (our blog)

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CONTRIBUTORS

Aaron Lacey

Emily Wang Murphy

The CARES Act: More options for higher education

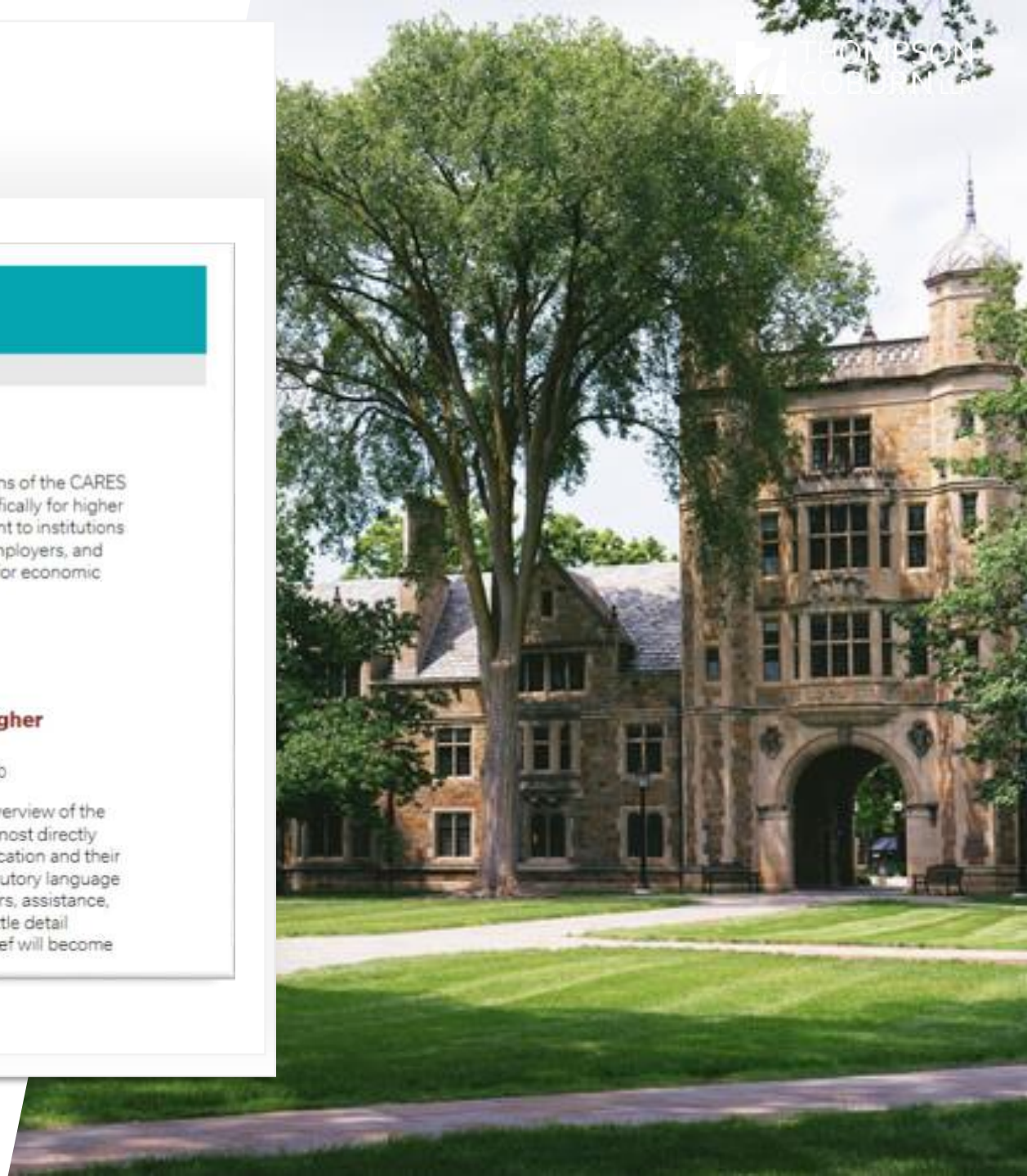
Aaron Lacey · Christopher Murray · Scott Goldschmidt · April 3, 2020

This is a brief overview of provisions of the CARES Act that, while not designed specifically for higher education, are nonetheless relevant to institutions in their roles as businesses and employers, and which may provide opportunities for economic relief. READ MORE

The CARES Act: Summary of provisions impacting higher education institutions and borrowers

Scott Goldschmidt · Aaron Lacey · Christopher Murray · March 27, 2020

In this article, we provide a brief overview of the provisions of the CARES Act that most directly concern institutions of higher education and their borrowers. In some cases, the statutory language contemplates extraordinary waivers, assistance, and accommodations, with very little detail regarding when and how such relief will become



TC Extra Credit

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REGucation ALERT

REGucation

Regulatory & Policy Insights from the Thompson Coburn Higher Education Team

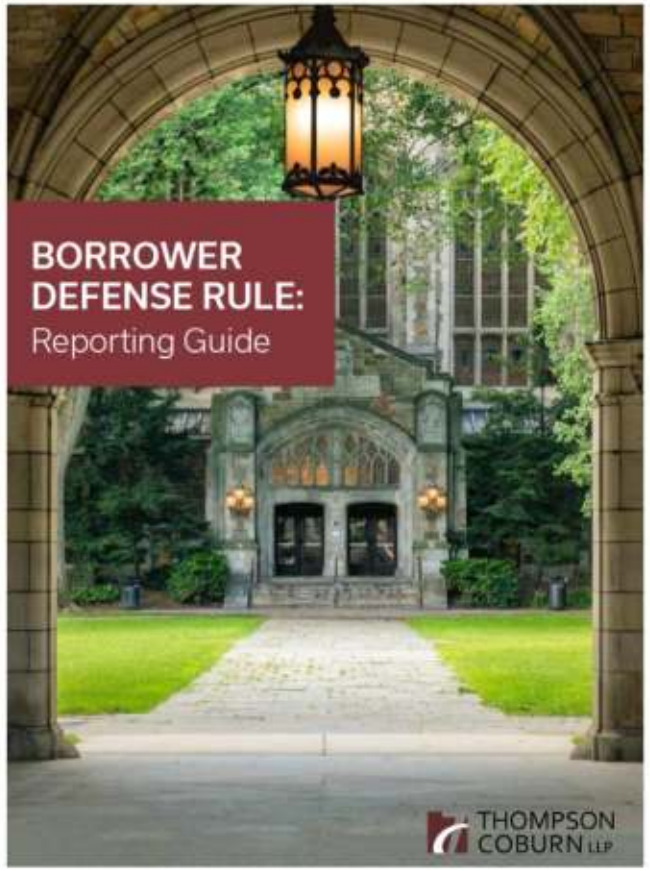
ED issues instructions to Higher Ed to obtain CARES Act funds

Earlier this afternoon, the U.S. Department of Education sent a letter to institutional leaders detailing the process for securing the first round of relief funds under the Coronavirus Aid, Relief, and Economic Security ("CARES") Act. The Department has included a breakdown of the funds each institution will receive under the Higher Education Emergency Relief Fund, as well as a Certificate of Agreement that must completed.

Learn More

Aaron Lacey
314 552 6405 direct
Email | Twitter | LinkedIn

Aaron Lacey is the leader of Thompson Coburn's Higher Education practice, host of the firm's popular Higher Education Webinar Series, and editorial director of REGucation, the firm's higher education law and policy blog.



Presenters

THOMPSON COBURN LLP

Professional Profile

Retired Judge Booker T. Shaw

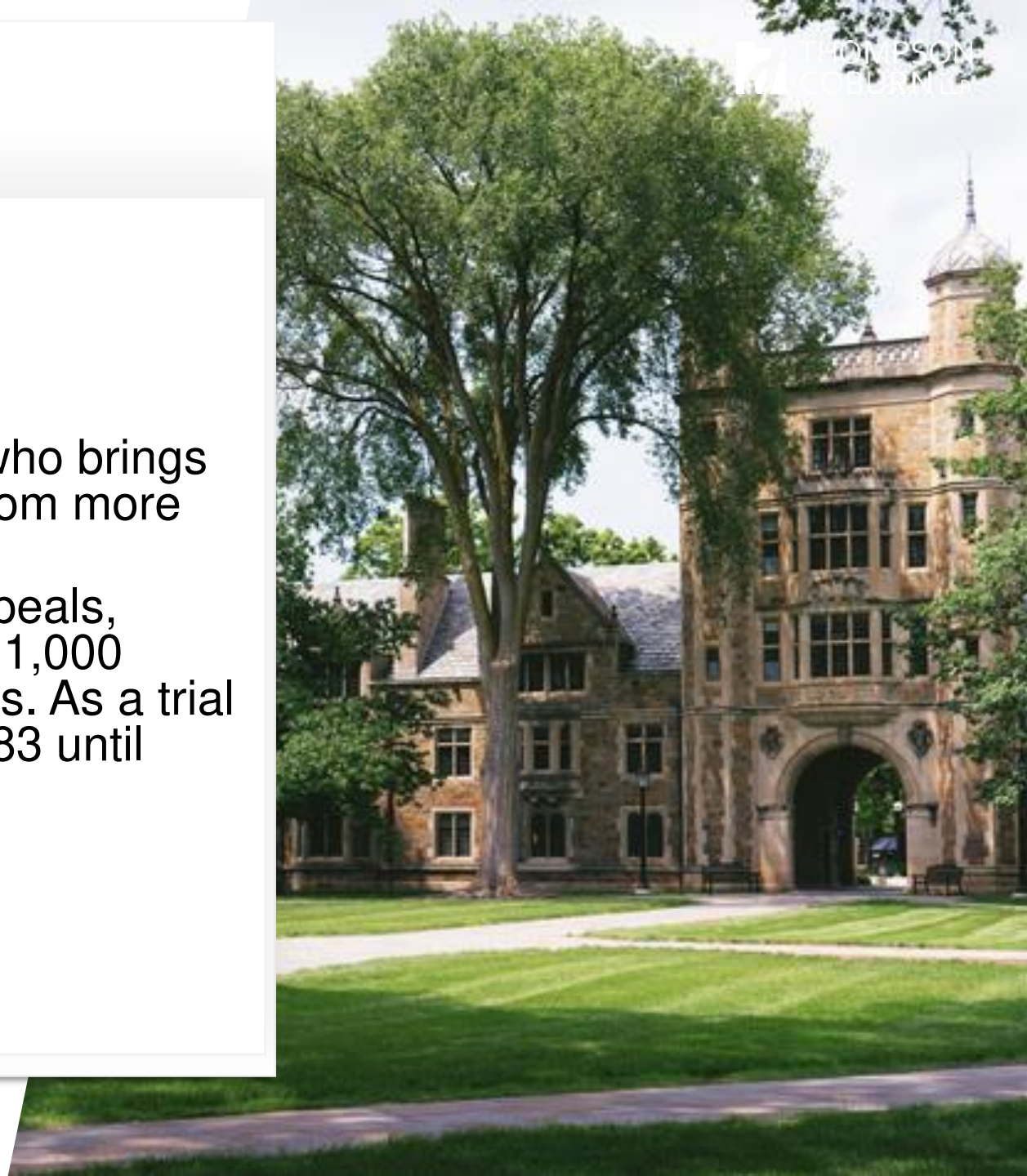
- Partner, Litigation & Appellate Practice

Practice and Experience

- A skilled litigator and appellate advocate who brings valuable insight and perspective gained from more than 25 years on the bench.
- While serving on the Missouri Court of Appeals, Eastern District, participated in more than 1,000 cases and authored 141 appellate opinions. As a trial judge in the 22nd Judicial Circuit, from 1983 until 2002, presided over more than 500 trials.

Contact Information

- bshaw@thompsoncoburn.com | 314-552-6087



Professional Profile

Scott Goldschmidt

- Counsel, Higher Education Practice

Practice and Experience

- Former Deputy General Counsel for Catholic University, brings in-house perspective to legal, regulatory, and compliance issues faced by institutions.
- Routinely assists with matters involving discrimination law, student affairs, contract drafting and review, and policy development.

Contact Information

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Professional Profile

Aaron Lacey

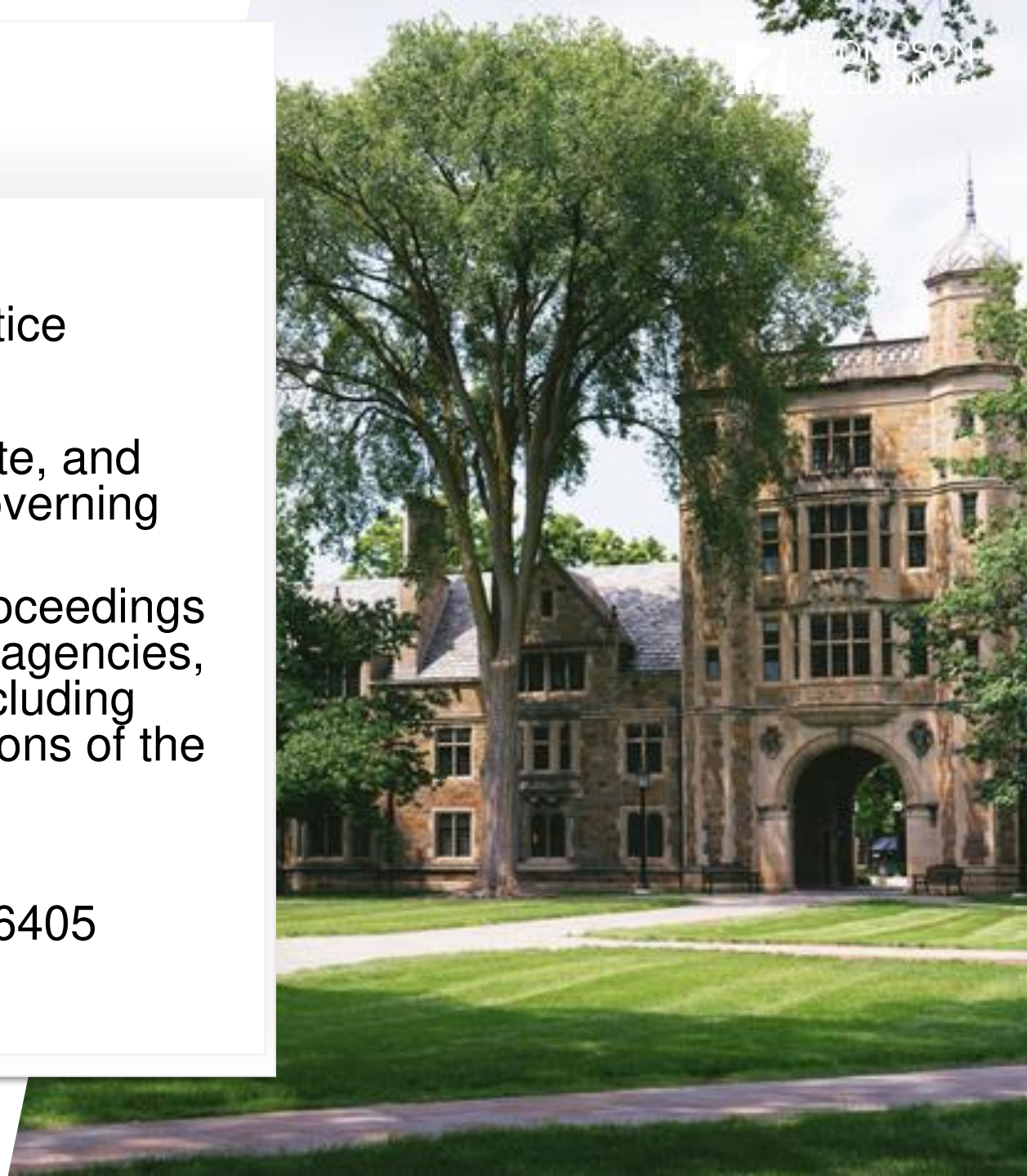
- Partner and Chair, Higher Education Practice

Practice and Experience

- Provide regulatory counsel on federal, state, and accrediting agency laws and standards governing higher education.
- Represent institutions in administrative proceedings before state licensing entities, accrediting agencies, and the U.S. Department of Education, including matters arising from audits and investigations of the Office for Civil Rights.

Contact Information

- alacey@thompsoncoburn.com | 314-552-6405



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