

Courtney Bullard:

Welcome to the Law and Higher Ed podcast. I'm your host, Courtney Bullard. An attorney that has been practicing almost two decades in the space of higher education specializing in Title IX compliance. If you want to learn more about myself or my background you can listen all the way back to episode one where I share my journey in my law practice as well as some fun facts and you can also check out my bio on my website, www.icslawyer.com.

It is 2020 which is hard to believe and there is so much on the horizon that ICS is bringing to you to help you in your professional developments. So I wanted to cover that with you quickly before we dive into today's episode. First, Title IX University launched on January 9th.

It is compliance at your fingertips. Digital courses to help you and your proficiency that you can take anytime, anywhere. And its inaugural course is Title IX 101 which covers the evolution of Title IX from its enactment through today. A super important class to ensure that you have all the foundation that you need whether you are an aspiring Title IX professional, a new professional, or a seasoned Title IX professional.

It's also helpful for attorneys who are practicing in this field or who want to begin practicing in this area. You can check out Title IX U through the link that I've provided in the show notes which is titleixu.com. We also have a signature conference, hot topics, and Title IX in March here in beautiful Chattanooga, Tennessee put on by our ICS team.

It will start off with a complimentary lunch and learn for Tennessee Title IX coordinators on that Thursday where we will cover all things specific to Title IX here in Tennessee and there's a lot that has happened in the sixth circuit. So very important information as well as an opportunity to collaborate with your colleagues across the state.

We will then dive into an NPRM intensive which is going to be the pre-conference and then at 6:00 pm that evening open to everyone is a welcome reception. Friday we will kick off with our keynote speaker Dr. Laura McGuire who is a past podcast guest. She is a sexologist and just an overall really neat person with great information to share.

And then we'll dive into different sessions covering all the hot topics that you need to know that are relevant for Title IX coordinators today. So I hope you'll join us. The link for registration is in the show notes as well. Finally, we always try to provide you with monthly complimentary webinars and we have several lined up for you in 2020. Expect also when the NPRM drops that we will of course have a webinar that will be released on that or any other timely matters that come up.

But we have some really great topics. All of those can be found on our events page on our website and there's a link to it in our show notes. So I hope you will join us for some if not all of these and that I'll get to meet you in person in Chattanooga in March.

Jody Shipper:

You know if the messages are received, if I open my phone and get the messages while I'm on campus okay now I have the Clery side, the Title IX piece, we potentially have a threat assessment piece and if we're all even technically correct all by ourselves I'm doing exactly the limited bit I'm supposed to do on Clery and you're doing exactly the limited bit you need to do on Title IX I would argue we're both compliant and failing all at the same time.

Courtney Bullard:

I've really enjoyed getting to know my guest this week, Jody Shipper over the past few months. Jody is a nationally recognized subject matter expert with more than 20 years of experience in Title IX and related

fields. She's known for her insight into best in class programming, policies, and community outreach aimed at addressing sexual misconduct on campus. She lectures extensively at universities and conferences throughout the U.S. on Title IX, VAWA, harassment, and implementation of best and emerging practices.

Jody also co-founded Project IX in 2014. A non-profit focused on Title IX related services to schools with a mission to provide effective solutions or preventing and responding to sexual violence. Prior to becoming the co-founder of Grand River Solutions and Title IX services practice lead, she was a system-wide director for Title IX, VAWA, and Clery and sexual assault and sexual violence compliance for the University of California in 2015.

Prior to that, she served for 11 years as executive director of the office of equity and diversity at the University of Southern California where she also held the post of chief Title IX administrator. In those roles, she provided direct hands-on experience in the fields of Title IX, civil rights, employment law and workplace, and academic investigations.

In this episode, Jody and I discuss her approach to working with colleges and universities and Title IX compliance and the services that she provides through Grand River Solutions as well as the intersection of Clery and Title IX. My conversation with Jody is broken up into two parts or two episodes because we covered so much ground.

We discussed the Clery Act and its overlap with Title IX as well as common Clery mistakes that she sees in working with clients as well as the pitfalls of having silos on campus and how your Clery folks, your threat assessment team, and Title IX should all be working together with a little bit of a deeper dive into relationship violence or dating violence and stalking.

We end with some fun facts about Jody that I think you'll really enjoy hearing. She is a wealth of knowledge. Here is part one. Jody, it is such a treat to have you as a guest. This is another perfect example of meeting somebody that works in the same Title IX space that's a colleague that we kind of see each other online or hear about each other and then I was fortunate enough to come speak at your conference, got to meet you in person and now here we are recording a podcast, so I'm very excited to have you on.

Jody Shipper:

I'm delighted to join you.

Courtney Bullard:

So I wanted to start off as I always do with your journey in Title IX. I know you started, I was reading your bio before we got started today. I know your journey goes back a little way so whatever you're willing to share about how you got to where you are today I think would be great.

Jody Shipper:

Sure. I started off as an outside attorney at a law firm as many people who go to law school do and I started off in employment law. I actually had this funny idea that I would practice restaurant law which is not a thing, let's be clear but I thought it could be a thing because I worked in restaurants all through high school and college and I noticed that they're really a hotbed for all kinds of things that go on.

There's disability issues, ADA issues, no shortage of sexual harassment going on. There's safety issues going on, there's national origin questions, you name it. It felt like a really great microcosm and then you add in late hours, people who get paid extra money to be flirtatious and I'm thinking of bartenders and waitstaff, and what is that and what does that feel like? Are we accidentally suggesting

that you should behave in those manners to make better tips? So I just found that stew really fascinating.

Courtney Bullard:

And let me just say my experience was it's not accidental. I was in the restaurant world for a little while and they absolutely were like, "We're going to make you a cocktail waitress and you need to flirt with people and you could make so much money."

Jody Shipper:

Right?

Courtney Bullard:

There's definitely a culture in the restaurant industry that I talk about with my husband still to this day.

Jody Shipper:

And it's very prevalent in some, not everyone, but some. So I had spent a lot of time as a manager. I became a manager ultimately in a number of restaurants and started then training staff and writing manuals for other restaurants and thought this could be a thing.

Decided to go to law school and focused on employment law for no good reason. It just seemed interesting and sometimes in law school, we fall into something. And litigated a case my first year, I was part of the team. I didn't litigate it, I'm making myself sound grander than I was, but was part of a team that had looked at what is the correlation between at-will employment and an investigation?

Can you do a sloppy investigation and terminate someone and how is that impacted by at-will law in various states? And it was a case in which the employer was accused of having gotten the answer wrong in the investigation even though they'd done a spot-on perfect investigation and could they nonetheless be justified in terminating even though they came to the wrong answer.

And I became fascinated by that and started conducting investigations. Back then, this is so long ago, we didn't call it investigations. We called it go look into something. It was a go look into. And started training other attorneys on how we might do this? And where there perimeters and how could we do it better? And really started doing that work.

At the same time long before I had gone to law school I had been a guardian ad litem in the court system for abused children and had received an extraordinary amount of training on trauma and what it means and how it impacts people. And those two pieces were sort of lurking this investigations pieces in my brain and working in the court system and this training on trauma is lurking in my brain.

I did not set out to put them together, I'm not that clever. But I left law firm world, went to work at a university heading up an investigations unit which ended up becoming a much larger job and it turned out that, that kind of work blended together really beautifully with understanding what it is like to tell your story when you're barely able to access it yourself and how to properly look into something both in a manner that gives comfort to the institution, that it knows what happened and also in a manner that kept up with best practices. Which certainly in the last 20 years have evolved considerably. So that was sort of how I fell into it.

Courtney Bullard:

And so now you are co-founder of Grand River Solutions. Do you mind sharing a little bit about what you all do there?

Jody Shipper:

Sure. So we are a consulting group and I think the best way to think of us is that we can fill any gap that a campus has when it comes to Clery, Title IX or frankly any form of equity work. So if a Title IX coordinator needs some mentoring or coaching to get stronger, if they need someone on-site to really help them think through how to shape an office.

If a school needs an interim Title IX coordinator because there's a transition or someone's on a lengthy leave, investigations, hearings, appeals, and the same thing on the Clery side. If someone wants to outsource part of or even all of their Clery work then we fill in all those gaps. We're not a law firm so, we work closely with law firms, we turn cases over to them depending on where they are if there's legal implications.

But we do all that other work and we also do lots of compliance reviews and then on a just practical level, we do reviews that just help a school think through better how to coordinate workflow. Everyone who works for us has held one or more campus positions. So I think that makes it easy to understand how institutions actually work. So you can sort of make pronouncements about how it ought to go but then we try to translate that into helping people figure out how they're actually going to do the work on a day to day basis.

Courtney Bullard:

And there is such a need for that and I know we cross over in some of that work and I as I already mentioned had the privilege of coming and speaking at your conference and was able to meet your team so I know first hand you've got a great group.

I really enjoyed meeting everybody and hearing what they had to say in the sessions that you guys put on, so on that note I was able to attend some sessions where you spoke and while I already knew or thought that we were kind of like-minded in our approach to Title IX compliance and working with schools that certainly solidified it by me coming and hearing you myself.

So can you share a little bit about that and I think you've already mentioned some of what shaped your approach to compliance when you're working with an institution but is there a mission behind Grand River Solutions or your work in particular and the way that you approach it?

Jody Shipper:

Well, we have a mission of helping schools to do the work whether the equity work, the Title IX work, the Clery work, to do the work better. And to ultimately help communities be safer. Not because we're out there as armed guards standing on campus, I don't mean it that way but for example on the Clery side, if we can help an institution gather data more effectively, look at it more promptly, ensure the data is more accurate and help them save an awful lot of time producing their ASR. This is just one example.

First of all, the time saved that they're not spending at a desk is time someone can be out and about walking around their campus community. It's time they can be out getting to know members of their campus community be more helpful and the same thing if we can help schools gather their data both more effectively and be more accurate and look at it more frequently instead of waiting a year and a half later when you're pulling your ASR together that's not really helping the school get a very real-time view as to what's going on.

So safety, it is a word that gets flung around a lot but I haven't found another good word that fills that gap of helping schools to create community and create better communities and that's very much a part of our mission in this way. You know and speaking of compliance I mean some of this work is very complicated and frankly, we like to try and take the mystery out of it when we can.

But when we think about compliance, people bandy around this phrase of a culture of compliance and that's fine and dandy, that's a nice way to put it that we have a culture that an institution, everyone will comply with all the rules. I always think of that as a baseline. That's a sort of, of course, you have to do that piece.

Courtney Bullard:

Right.

Jody Shipper:

But can we do better? And by better I mean how does that impact the fabric of the way we think about issues, treat each other, look at what's going on in our campus community and ensure that the work that we're doing really goes to the betterment of all and these are all easy things to fling about and say when you're not up to your eyeballs doing the work.

But it does matter in that if I know that my data has to be accurate and that's it and nothing less than that is accepted at a community that's a really important starting point. That sloppy work is not tolerated, not acceptable. But that should just be where we start. Okay, am I using the data? Am I having conversations with people? Am I taking a look at what this means?

So if we have an increase in drug use in the last quarter going on well okay, should I keep that to myself because I'm the keeper of the Clery data? Should I be talking to conduct? Should I be talking to local law enforcement? Should we be talking to people in the community? What's going on? Is there someone on our campus or a group of people who are selling who are within our community?

Is there someone nearby who's selling to our students? Do we need to be having different conversations with our students that suddenly conduct notices that the number of both write-ups and maybe even significant discipline has really steadily gone up recently? We can't just accept the number and say we're compliant, we looked at it, we coded it.

No, we have to say, but what does this mean? How should we be reacting? What do we do with this? You know and sometimes in the short term, you're not sure what to do, okay. Are we going to get together again and monitor trends instead of just accepting, yep I looked at that data, yeah? We went from one meth case last year to eight this year, oops.

That might be compliant but that's really a bare minimum that you noticed it, you dealt with it. How are you taking that data and really taking that serious look at the community and what it means and how it's impacting everyone? And that's just one place where I think solid data is only a starting point.

Courtney Bullard:

And I love that example. Compliance is a word, your right, that's been thrown around and I talk about a culture of compliance especially when I'm talking to athletics departments because it's something that resonates with them because of NCAA regulations and things like that.

And I think of late because of all of the media coverage of course and when we think about compliance and college campuses we think about Title IX and sexual misconduct but it is more than that. And Clery is a huge component of compliance expectations on campuses that in my opinion seems to be overlooked in this scramble to build and develop Title IX offices.

And it is hard work. I mean, some folks have said to me, "Well there's a manual. Just look at the manual." And I'm like, "Well, yes and no."

Jody Shipper:

There is one and I'm sure all of us who do this work sleep with it under our pillows every single night.

Courtney Bullard:

Exactly. But I guess if you don't mind really quickly if we could go backward a minute.

Jody Shipper:

Yeah, sure.

Courtney Bullard:

Just for my listeners who maybe aren't familiar with what the Clery Act even is and a quick what is the Clery Act and how does it dovetail with Title IX? And then I would love to get your view on some common Clery mistakes that you see that you could maybe share that would help our listeners.

Jody Shipper:

Absolutely. So the Clery Act is named after Jeanne Clery, a young woman who was tragically raped and murdered at her school. And the Clery family after this tragedy took their grief and really pulled together a fascinating team to look at what could and should be done to improve college safety and campus safety.

And then also were able to work with legislatures to put forward legislation that was ultimately passed into the law and it includes a number of prongs or a number of steps. One is that you need to keep track of certain data and it's crime-related data. It's a little different from the employee relations side where we have policies or Title IX where we have policies that guide conduct.

This is much more driven by the law and every day when school campus safety offices get their incident reports they need to go through them. They need to make sure they are complete and then code them basically. Was it a burglary? Was it a robbery? Was it an arson? Was it a fondling and label everything. And then put all of that data into a daily incident log so that anyone who is concerned about safety could look at that and find that information.

You also have to gather all of your data at the end of every year into something called an annual security report which includes a lot of statistics and a lot of information about policies. Not just about those Clery crimes but about many other issues relating to safety. Including how different circumstances will be handled. What will be done if there's a missing student? What will be done if there's a fire? Are you annually testing your fire safety equipment?

All of the things that might relate to safety. You then publish that on the theory that someone who wants to go to school at a certain institution or wants to go work there could look it up and see wow, their crimes are going up every year. I don't know that I see them addressing that. Maybe I don't want to go to school there or maybe I don't want to work there.

And then the other part of the Clery Act that is very much tied to what happened to Jeanne Clery are these ongoing disclosures that must occur. This includes emergency notifications that have to be sent out to the community and something called a timely warning. A timely warning is very specific and I think not well understood. You're not just warning about generic bad things that may be going on but specific crimes.

We often call them the Clery crimes that did occur within what's called your Clery Act Geography and I'll get to that in a minute and if the institution has reason to believe that it might

happen again you need to send out a warning and it's called a timely warning meaning it has to be timely. So if you got word of a sexual assault, I found out yesterday but the assault that was reported was from three years ago that might not warrant a timely warning because we have nothing suggesting to us that this is going to happen again.

On the other hand, if I got a report today that there was a sexual assault last night and then I also get another report that five days ago we received this other partial report but it seems to very much match up with this one, there's a lot of data suggesting it's the same person who might be responsible. There might be something about a pattern or an MO that makes us feel like we have someone who is potentially a predator on the loose, we have a scary situation on the loose, we should send out a warning.

This is what did not happen with Jeanne Clery. No warning was sent out so she wasn't told, lock your doors. And if she had been it's quite possible that if she'd been warned she would have locked her door and then this very bad person whom they knew was on the campus wouldn't have gotten into her dorm room.

Speaker 3:

Did you know that ICS has a membership? Are you a Title IX coordinator that feels you can never keep up with the ever-changing Title IX landscape? Or do you need access to tools that can help you stay current and perform your job at the highest level for your institution? Perhaps your campus needs help with training. Put our knowledge to work for you with an ICS membership. Over 15 courses that can be used to train your campus. Unlimited access to all ICS webinars. Compliance aids and tools that are legally current. Discounts on services and information to assist you with Title IX and other regulations such as Clery, FERPA and the ADA are just a few of the benefits of an ICS membership. Whether you are interested in one as an institution or an individual contact ICS today or visit www.icslawyer.com to become a part of the ICS family.

Courtney Bullard:

I know first-hand timely warnings are... I know from being on a campus and working on a campus and advising folks when I was in-house counsel even it can be hard for campuses to make that determination especially when you're dealing with sexual violence or domestic violence where folks know each other and there's that question is this something that warrants notifying the campus so that they can prepare themselves? And we could talk for hours about it but just-

Jody Shipper:

Yes, and they're tricky.

Courtney Bullard:

Yes very tricky.

Jody Shipper:

They are as you said. One of the things that I think is most important is to at least document your rationale. And the other thing that can be confusing where we see a lot of pushback is if you have someone stealing, breaking into rooms or they weren't even locked, going into unlocked rooms or classrooms or into backpacks and stealing laptops and there's been a rash of those, that might get a timely warning and possibly a sexual assault wouldn't depending on the factors.

And I know that can be really confusing to students, it can be really confusing to the parents, it can be really confusing to staff and faculty who work there. It's not that one is worse and one is lesser. It has to meet a number of requirements as you know.

Courtney Bullard:

Yes, it's tricky.

Jody Shipper:

With all the geography and that you believe it's going to happen again. This doesn't mean that a school can't... And this is where we get to this idea of going beyond compliance. If there's something scary going on in your community this doesn't mean that your director or your VP of student affairs or dean of students or whoever it may be in that role can't send out a safety notice to the students or to the community, it's just not a timely warning.

Courtney Bullard:

Absolutely.

Jody Shipper:

So the other piece of timely warnings that can be so interesting and I know that you've gone through this and experienced it is what information do you include? Because you not only warn that it happened you want to go farther than that and add a safety tip on what you can do. Now, with a laptop, okay don't leave it unattended. It just follows naturally. Hey, people be careful, don't leave laptops or valuables unattended.

If there's a sex assault and you issue a spate of suggestions, watch who you're with. Don't go out alone. Don't have drinks it might make you vulnerable. It can sound like your scolding and it can sound as if you are basically blaming the victim who experienced this. So there's a very fine line. Some people find it not so fine but I sometimes find it a fine line of helpful tips that are actually helpful but if you're going to do that I think it's really important to make clear somewhere in that timely warning that no one is responsible for being the victim of a crime. You didn't choose to be the victim of a crime. The person who engaged in that misconduct, they were the one who chose to engage in misconduct.

I think some statements like that should be there. At the same time, if there is a tip like someone followed someone into a dorm because we all have rules, the key swipe or something like that.

Courtney Bullard:

Yes, don't prop the door open.

Jody Shipper:

Don't prop the doors. The door was propped and that's how someone who didn't belong somewhere got in. Okay, then that would be an appropriate tip to remind everyone that please, I know it may feel rude or awkward to say, "I can't let you in until you show ID." And you have to swipe but it's so important that you do.

Courtney Bullard:

Yep. Clery is a tricky space for sure. So along those lines I guess because I know we could talk a lot about what is required under Clery and I mean there's just a lot to it. What are some things that maybe you

could share, some helpful tips for folks listening on some common mistakes you see? And I can tell you from my experience I have clients who didn't have a Clery, a campus security, a Clery compliance officer even really designated and there's kind of this bifurcation between responsibilities and no communication and siloing which we'll talk about in a minute. All the way to folks who really have it down to a science and then everything in between. So anything that is kind of digestible and that they could take back and sort of double-check on now that you could share I think would be really helpful.

Jody Shipper:

Sure. So I think there are a couple areas where people can really think about... Some of them are more easily corrected than others but one is just the annual security report. They're a very straightforward component, they're actually listed in that handbook we referenced earlier and one big mistake is leaving something out. Even if you're taking from last year's template and you think that'll save us double-check always before you say, "Yes we are done."

I've seen people make errors like they forget to include the information about the annual fire testing for example. Just leaving out a section that really should have been in there. It's a very easy area to make a mistake. So one is go back and make sure that you actually have all of the sections you're supposed to have.

Courtney Bullard:

Yeah, check and double-check.

Jody Shipper:

Check and double-check, absolutely. And part of that goes to starting it too late. I mean, you can't start too early. I think getting a group together, I know people in higher ed, we love our committees and the administrators also push back on committees but you need to have a couple people who are working on that annual security report. It doesn't have to be 30 but it's really good that it be a couple people.

One so everyone can check everyone else. Two, so you don't have one person completely burdened and if that person leaves during the year and no one else quite knows where they got to and what's going on these are all kinds of very real problems.

Courtney Bullard:

I cannot put a finer point on that because I see it all the time and you see it really in a lot of areas of compliance. Including the Title IX coordinators but with Clery especially where one person is tasked with doing the ASR and that's it and no one else even knows what it means or what they do or how it works and that's A, unfair to that individual because it is a big task but B, leaves the institution vulnerable because if they leave, which people do leave in higher ed and move on or what have you. That leaves a very big gaping hole.

Jody Shipper:

Yeah. I agree I agree. The other thing is once you've pulled your ASR together you're not done. So you need to publish it. You need to send it out to people in your community and you also need to submit it to the department of education and the publication of it, putting it on your website, sending it out to your community. On the one hand, they're such easy things to do. You should have someone may be in your communication's office, somewhere else who has the email all written, teed up ready to go and

you're going to drop the link into it or drop the PDF into it or whatever it is your going to do and then someone forgets to hit send.

So checklist, checklist, checklist, and as you just said, Courtney, not burdening one person with all of this so that if you and I are working together and we're on a campus Courtney and I say, "Hey next week is Clery week. There's the email, I'm going to send it to you by this date. Are you good to go?" "Yes." And then I'm going to check with you again on Friday. Yes, your good. And then when I talk to you Monday and you say, "I don't think I'm going to be in the rest of this week. I am so ill I'm going to hope I can do it from home but I can't promise." Yeah, make another plan right away.

Courtney Bullard:

Right. Yes. Things happen.

Jody Shipper:

Things happen and often when I talk to schools it is this little stuff that held them up.

Courtney Bullard:

Yes. And when schools get criticized in media, and usually it's not around these things with the Clery Act but the same holds true. Often it's this picture like campuses are really just setting up an environment folks to be unsafe and it's like, well not it's really not that. It's just they're human and they have a lot going on and many job responsibilities oftentimes and things happen. People leave, people get sick, people get cancer. People have to take an extended leave of absence and-

Jody Shipper:

Stuff happens.

Courtney Bullard:

Yes and not every institution has prepared to have that depth to ensure that they can manage if something like that happens. So you guys come in, I come in whatever.

Jody Shipper:

Exactly. We're all in the swinging. The other mistake people make has to do with geography. So the Clery Act has very defined geography and lots of crazy rules about how a school defines its geography. For example, where your school ends the last building isn't the end of your geography. That other 50 feet of lawn is yours as it were for your Clery geography and the sidewalk. And then the street over which you have no control. And guess what, the next sidewalk too.

But if you have nothing to do with the building across the street when someone leaves the sidewalk across the street and they go into the building over there then they're no longer on your Clery geography and for schools that have very defined, you know you have this six acres or this 300 acres or whatever it is. Great, it's pretty easy and once upon a time most schools could look at a map and they could draw a nice big square or something around their campus and that was exactly what it is.

But now, making sure you know your geography is so much more complicated than it sounds. So if you ran out of space and you put one of your departments, maybe you put your advancement team or your payroll people or whatever it may be, you put them downtown you got some office space. Guess what? You expanded your Clery geography and now you have obligations for things that happen maybe not even in that office but in that hallway or the elevator going to your floor.

So these are all things that people have to think about. If you run a program, every year you take a group of students and you spend three weeks over winter break at your state capital and you do that every year or maybe over spring break and the students meet legislatures and they are sitting in sessions and they have a great time and you do this every year. Guess what? That just became part of your Clery geography because it's part of your programming and so on of the other big mistakes people make is knowing your geography which requires that someone talk to your real estate office. To people in student affairs, to people who run programs and figuring out what your geography is. Really common Clery mistake. You'll forget. "Oh that's right we opened a clinic."

Courtney Bullard:

Yeah, absolutely. Those are some great tips and again it's complicated.

Jody Shipper:

It is.

Courtney Bullard:

A complicated space.

Jody Shipper:

Yeah and then just finishing up I think quickly other big top Clery mistakes. Misclassifying a crime that's just someone was sloppy or just inaccurate or they didn't know. When you get to certain things like someone who was referred for a drug violation or referred by say one of the RA's to student conduct for a drug or alcohol violation. We could again spend hours.

Courtney Bullard:

Yes, absolutely.

Jody Shipper:

But when is it a referral that needs to be noted? If they were referred for both drug and alcohol you don't count it as both. So these sorts of things... And then not documenting your rationale on sending or not sending your timely warnings. A lot of this, I think thematically for me these are record keeping and bookkeeping as it were mistakes.

So making sure you know who's going to do what. When I work with a school we make a chart and I make sure everyone whose name maybe should be on that chart is in that meeting. Okay, who is ultimately responsible for the daily reconciling? Who is responsible for crime logs and for reconciling and how often and on a quarterly basis? And who is responsible for gathering the data on where all of these programs have taken place around the country in the last year. And I want everyone's agreement that everyone knows who is ultimately responsible.

Courtney Bullard:

I love that suggestion. Thank you for tuning in to the Law and Higher Ed Podcast. I hope you will continue listening to episodes which are scheduled to be released every other Thursday with a couple of informational episodes sprinkled in or if something happens on the Title IX front which it probably will. Of course, there might be something that is more frequent.

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