

Courtney Bullard:

Welcome to The Law and Higher Ed podcast.

Courtney Bullard:

I'm your host, Courtney Bullard, a practicing attorney who specializes in compliance with Title IX and related laws and regulations for institutions and school districts. I'm also the owner of Institutional Compliance Solutions and the creator of Title IX university. Check out episode one of this podcast to learn more about me and my company.

Courtney Bullard:

We're kicking off our series called From Policy to Practice. ICS has weekly blog posts and we'll have law and higher ed episodes dedicated to the implementation of the new Title IX regulations.

Courtney Bullard:

We're still learning and the Department of Education is still releasing guidance. But in working with schools even pre-regs, we know that implementation is key to effective Title IX compliance. August 14 has come and gone and we're all catching our breath. Most of you have shiny new Title IX policies and now the real work begins. We hope that our posts and podcast episodes can help you and your team as you work through these months living the regs as one of our guests calls it.

Courtney Bullard:

As always, ICS has services as well as community access to help you in this implementation. Go to [www.icslawyer.com](http://www.icslawyer.com) to learn more about community access as well as any of our services. We would love to work with you.

Courtney Bullard:

In addition to community access and our services, we also have virtual certified Title IX training for Title IX coordinators, investigators, decision makers, appellate decision makers, advisors, and more. Be sure to check all of our options out. We have almost 25 trainings between now and the end of 2020. We've gotten great feedback and we've really had a great time in all of our virtual trainings with our attendees. We hope you will join us virtually for those courses as well.

Elizabeth Canning:

That is what the school needs to know is sometimes we are so dedicated trying to help out that we forget to say, "You know what? I need to ask. I need to be clear." Because administration will respond when they see it in a concrete way. Think about how to present that information based on people hours, resources, cost to advocate for whatever you're looking to advocate for.

Courtney Bullard:

All of my law and higher ed guests have a passion for the work that they do. My guest this episode, Elizabeth Canning, is no exception. She's the owner of Campus and Workplace Solutions. Prior to starting Campus and Workplace Solutions almost a year ago, Elizabeth served as the Associate Vice President of institutional equity and human resources for the Community College of Rhode Island. Prior to that, she was the director of Title IX initiatives and Clery Act Compliance and Title IX coordinator for the College of Holy Cross and the director of equity and compliance services at Johnson and Wales University.

Courtney Bullard:

Her philosophy is similar to ours at ICS. She works with college and universities on Title IX compliance as well as Title VII work with human resources serving as an external investigator and decision maker and also auditing and reviewing policies and procedures and process. She is a lawyer and a practitioner, again, which very much aligns with the work we do here at ICS.

Courtney Bullard:

In our discussion, I really enjoyed because she's so enthusiastic about her work and had some really great insight on living the regs. That's a quote that comes directly from her that I am absolutely stealing. But living the regs since August 14, as institutions grapple with who to put in these key Title IX roles and when and if to utilize external folks for the roles of investigator, decision maker, or even advisor.

Courtney Bullard:

I really hope you enjoy this episode as much as I did.

Courtney Bullard:

Hi, Elizabeth, and welcome to the podcast. I'm so excited that we finally made it through.

Elizabeth Canning:

Yay.

Courtney Bullard:

The big August 14 deadline and we could get schedule to sit down together.

Elizabeth Canning:

I'm so excited to be here, Courtney. This is going to be a lot of fun. So excited.

Courtney Bullard:

Yes, we've already chatted it up before we even started pressing record. I think we could talk for hours.

Elizabeth Canning:

Oh my gosh, we could.

Courtney Bullard:

I know we met previously although neither one of us can fully remember. We don't recall where we met exactly but I know we met before and then we've connected again through social media, LinkedIn, Twitter, all the things and then I had the privilege of having you in one of our trainings, but I don't fully know your entire background and how you got into this work and what you're doing today. Let's start there.

Elizabeth Canning:

Awesome. I'll tell you a little bit my background.

Elizabeth Canning:

In the law field, I actually started as a corporate attorney. I was a commercial real estate attorney and then quickly realized that it wasn't people enough for me and was a public defender representing juveniles for many years in Rhode Island. Really loved that work. Handled a lot of sexual assault cases, dating violence cases. And in 2011, for the Dear Colleague Letter, I should say that time in Title IX history. Was hired at an institution Johnson and Wales University as their first real full time Title IX coordinator to start the program there.

Elizabeth Canning:

I've not looked back from higher ed. I love higher ed. Really being able to work with students and help institutions. I created and established the Title IX and actually, was equity office as well. I was responsible for all forms of discrimination, prevention, training, investigations. And then I moved to another institution Holy Cross where I started that Title IX clery office and set that office up and established that and put procedures in place.

Elizabeth Canning:

And then went to another institution, Community College of Rhode Island, where I went back to their overall forms of discrimination. There's a lot of intersectionality in this work. It's hard to sometimes carve out those pieces. I was head of, again, their equity work at that institution.

Elizabeth Canning:

And then recently decided that I love setting up offices, I love getting into this work, I love putting procedures in place, working on systems. Have been doing this a long enough time that I said, "I'm going to try this on my own and see how I can support other institutions with bringing these legal compliance obligations to life." That's what I love doing. It was fun.

Elizabeth Canning:

I have met you briefly and then I've been following you and listening to your podcast. These are great. So informative. I'm thrilled to be able to be here today and talk with you more about this. Every topic within this is so interesting.

Courtney Bullard:

Like you said, there's a ton of intersectionality as well in this work and other work. It just goes on and on and all the topics we could talk about in our podcast. Tell me, now that you're out on your own, how long have you been doing that and in general, what are you doing?

Elizabeth Canning:

I think I launched, I would say, it's almost a year, December 1. My work involves overall helping institutions with all forms of discrimination. It goes from creating policies and procedures, training, investigations whether it's Title IX, certainly right now is a very active area, of course, with the regs, but other forms as well. I also was the ADA Section 504 coordinator. I also spend time looking at policies and procedures for compliance around working with students and employees with disabilities.

Elizabeth Canning:

And then another piece of my work is consulting. I also do interim Title IX coordinator work, coaching, and consulting. And then also one of the big things, and you and I've talked about this, is how do we bring things to life but also how do you get an institution to get a culture of compliance or think about environment that is equitable and inclusive. I do organizational culture work as well, helping institutions put that in place as well.

Courtney Bullard:

You listen to the podcast. My first podcast was with Michelle Rigler on disability services and I'm actually putting that into practice myself for my business. We have a deaf school that is attending one of our Title IX coordinator trainings and I'm working on getting an ASL interpreter and all that. It's been really interesting. It's always a learning experience. Inclusivity takes so many different forms.

Courtney Bullard:

It's great to know you do that work because while Title IX, of course, is at the forefront at the moment of most people's minds and our listeners, there's still so much going on in other areas with respect to creating a workplace that is culturally inclusive and all that.

Courtney Bullard:

We've got Celeste on our team that does similar type investigation, Title VII and all that. There's a lot happening out there. There's just not enough time or space on the internet to tell people about it. But there is. There's still all of that going on as well if not more so because of COVID and all that that's brought up in the employment context.

Elizabeth Canning:

And especially employment context [inaudible 00:09:19]. It's really important that you have her and that work taking place because... In my prior institution, I was also in charge of HR and what we saw was all those employees are there. You want employees to be happy in their work and successful in their own right.

Elizabeth Canning:

But in the end, their job is to help students. We're all student centered, every institution, and so it's making sure all that's woven throughout everything. The employees are walking. They're happy, they're welcoming, they have the tools to also support the students and to help the students on their path as well.

Elizabeth Canning:

Sometimes, people look at employment and the student separately, but it's really important that people see that it's all woven together.

Courtney Bullard:

You are speaking my language.

Elizabeth Canning:

Yes, love it.

Courtney Bullard:

It's good to know that you work in that area as well. I was LinkedIn stalking you before we started and maybe I caught on to that or maybe it's just too early in the morning. But either way, it's really good to know that you're doing that work too because honestly, there's a lot out there at the moment and a lot of need for external folks which is what we're going to talk about.

Courtney Bullard:

You and I had this I guess it's called DMs. I don't know. I have to go what my teenagers [inaudible 00:10:31] but we had this exchange through messaging on Twitter talking about lots of things. But this is what I love about all the colleagues that I have connected with, everybody is completely willing to help each other out, to bounce ideas off of each other. You came to my training. I'm looking at other folks training. We're all in this together to ensure that the schools out there have the resources that they need and whatever mechanism makes the most sense for them.

Courtney Bullard:

You and I were going back and forth about serving in these external roles post the implementation of the new regulations on August 14. I don't know about you. I know based on our conversations you were working with some institutions on reviewing their policies and procedures for us. I have really been recalibrating since August 14. That was a crazy 90-day push for us as a team here and just now everything's settling and getting back into a little bit more of a routine.

Courtney Bullard:

We have been engaged by several institutions to serve as external decision makers or external investigators or even advisors in this new world we're about... Well, we're not about to be in, we're in it, of implementation of the new regulation. You and I were talking about that and I thought it would be a really great topic for a podcast episode simply because it's something that I don't think is talked about enough, like the who, what, why, and how of hiring externally. That is our plan even though I know we could talk about a thousand other, too.

Courtney Bullard:

Let's start with the new regulations have this requirement for this very robust, prescriptive, formal Title IX grievance process and we're not going to get in the weeds on that, of course, but it also requires identifying different individuals on a campus, administrators to serve in all these roles, Title IX coordinator, investigator, decision maker, appellate decision maker, informal resolution facilitator, and then you must provide advisors in a live hearing.

Courtney Bullard:

As a result, where some of those roles were combined previously for institutions, now they must be separated. A lot of institutions are considering contracting for folks to serve in some of those roles in every single case whereas before it would be pick or choose.

Courtney Bullard:

Let's start with the first question and that is, what are some considerations for institutions and why they might want to adopt that model in all of their cases? And then we can talk about if even they're not

going to contract with external folks for those roles, there still might be situations that arise where there might be a need for external [inaudible 00:13:20]. Let's start there. What are your thoughts?

Elizabeth Canning:

You're right. This is the new frontier, I think, for institutions and for institutions that are already facing some of the financial strains just from enrollment generally but certainly from the impact of COVID. I know a lot of schools are struggling with that.

Elizabeth Canning:

First of all, you have to do it smart and thoughtful. But to bring in someone externally... I think that the main thing is looking at your own staffing capability. I know I've talked with some institutions of taking a really hard look at who do we have on deck, who's in our pool folks. If we were going to use internal people, what would that look like? What skills do they need to have?

Elizabeth Canning:

Because for each role, I think you almost need to look at it like a job description. What does this role require? Because sometimes to save money or to make things work, people will just put people in buckets or put people in roles that they're like, "Ah, they have an interest in this. Let's do this." But you actually have to be successful in it which in this case is also a liability issue. You have to have the skills and abilities to do so.

Elizabeth Canning:

I think schools need to look at, first of all, what does this role require? If you happen to have people who can fill that, great, and to make sure you not only have one person but enough people so that you're not tasking one person to be in that role all the time.

Elizabeth Canning:

The other piece, however, is a lot of institutions are also concerned about the stress this will have on their employees because some employers are concerned about this is heightened regulation every single step is spelled out and that is making some people really uncomfortable and really nervous and stressed about taking on [inaudible 00:15:02] other employment duties these high level... Feels that way, these regulatory obligations. That's why some schools are looking, saying like, "This is beyond what we can put on people." It's just also cleaner to have an external person.

Elizabeth Canning:

Also, given this heightened responsibilities, you're going to have people who work together on opposite sides of the table or just in a role... By the way, that can take a lot of time.

Elizabeth Canning:

You have to think about... Higher ed, we all wear a million hats. You and I both been in higher ed. We know that employees are amazing and are willing to do anything. There's maybe [inaudible 00:15:42] this is a little too far. They have other jobs to do as well. Recognizing it's a time, it's a skillset, and it's a significant responsibility that is almost like another job.

Elizabeth Canning:

I think part of the challenge with this work I've seen and I'm tracing as well is sometimes institutions haven't fully understood the work involved with a compliant program and they haven't thought about the staffing up in a meaningful way. I think that's why I go back to the job description to the level of work because it is a compliance office and it's very real. There're very real consequences, very real obligations that take very real time.

Elizabeth Canning:

I guess even going back to look at how your offices are staffed, look at the work you're going to need, try to work with your coordinators around the estimated hours because that will help you make a decision about how you want to staff and who to put in the role.

Elizabeth Canning:

It's multipronged. It's resources. It's who you have there. It is also what you want to ask of your employees. And then some schools say, "If we're going to keep it internal, how do we, A, train them really well and B, make it worth their while?" This is a whole new job responsibility in a way.

Elizabeth Canning:

I think [inaudible 00:16:57] conflicts. Maybe you have a lot of trained... something about adjudicator, for example, or the advisor role. But maybe for investigator, you have a lot of trained internal folks but you have a lot of people already assigned or people can't do it, or it's a real high level investigation that you don't want to put employee on or there's a conflict.

Elizabeth Canning:

Some schools will have employees trained to handle harassment cases, but not dating violence or sexual assault cases because that just takes another skillset to be able to manage those conversations and what that brings to bear on investigators.

Elizabeth Canning:

Again, you look at employees. Is that a lot to ask of them to also now take on some of these other elements?

Courtney Bullard:

Absolutely. I say all the time folks go into higher education and then, as we say, we've had so many people tell us, "I was voluntold that I was going to be a Title IX investigator or a Title IX decision maker." They were hired to be maybe just a student affairs professional, not just, but a student affairs professional which already has so much that goes with it but never in their wildest dreams that they think they would be investigating rape allegations. That's heavy stuff. It's big stuff.

Courtney Bullard:

Adding that to their job description, I think... I love the idea of what you're saying about looking at job descriptions, staffing, and time. I know you've seen it too, everything from folks who have five different titles and doing this work as an investigator, a decision maker is just yet another hat for them. Not everyone has these huge robust Title IX offices, most don't, where they are deeply or more deeply resourced.

Courtney Bullard:

Even those that have robust offices would say, "We would love more resources," and weighing the whole, "Does it cost more to hire someone full time to do this or to use external folks on a case by case basis as these matters arise?" I love everything that you're touching on.

Courtney Bullard:

And when you talked about incentivizing, is the word I would use, employees to do the work, so many folks have asked us, "Who should we ask to be as an advisor?" And they're like, "We don't have any money to give them. We don't have any stipends to give them." We've said, "In any of these roles, you have some professionals who are looking for additional professional opportunities that will help them later to resume build. Those might be your folks to reach out to."

Courtney Bullard:

But that's a really hard question, because most people I think are like, "I don't want to be an advisor. That sounds terrible." You know what I mean? It's really interesting.

Courtney Bullard:

I have clients who are very small, don't have enough, as I like to say, warm bodies. They don't have administrators to do the work and that's why they're hiring externally when it comes up but also have, as I told you before this, huge university systems who have very sophisticated and deep Title IX offices who are hiring external for all of these matters, who could find the folks on campus to do it, and are choosing not to just to, A, avoid the conflicts of interest arguments just out of the gate and B, for the reasons that you just said, they just don't want to put their employees in that position as the decision maker role is a rough one, I think, under these new regs [inaudible 00:20:20].

Elizabeth Canning:

Yes. Yeah, yeah, yeah. Well, it's interesting, I think you have a mix. I think that the advisor role is a really good one because actually I had institution asked me. They were trying to say, "Do you know of any folks who we could contract with?" I don't find a ton. I know there are schools out there that are resourced and are contracting with external folks and maybe you may know some. But some of the schools I talked to, they're still having internal people. I would say, in that case, you can do a mixture. It doesn't hurt.

Elizabeth Canning:

If you think about the advisor role, the best advisors are the ones who are really informed, the ones who can make it harder for your community members, I think about the impact in community members, are the ones who are not informed. I don't care... Even if you have an advisor who is really in there challenging institution every step of the way, I'm okay with that if they understand the process because that's just their role.

Elizabeth Canning:

Maybe it's because I served in that role, I'm fine with that because we'll just, "Look, this is the process. I'm going to say, 'You have to stay within it, but I get your advocating.'" But they usually do so within the parameters of your policy because they understand it.

Elizabeth Canning:

They're setting your committee members up. They're managing them, ideally better, because the expectations are set. They're clear. If you have someone coming and saying, "This is wrong. It shouldn't be this way." They're bringing criminal law in or something that's even apply, then that damages your community members because there's a mismatch between what reality is and what they've been guided.

Elizabeth Canning:

I guess I'm going back to internal advisors are, I think, again... I would say training is good because then you have someone who understands the process that can help that committee member navigate appropriately and effectively.

Elizabeth Canning:

But I think you have to be very clear about who can be in that role and provide them with training and narrowing the scope of that because I think people are worried about those legal obligations and just being clear, this is the narrow role that our internal advisors can serve so that they don't feel like they're taking on a lot. But yeah, then also, how do you incentivize them and how do we really look at that to be some other way of saying this is new skill development, it's professional development. And frankly, it is.

Elizabeth Canning:

I always tell people, "If you've been trained in this work, it is a tremendous skill." Schools need to think about it from that.

Courtney Bullard:

Absolutely. Talking about advisors just a little bit longer for a minute. We have contracted to serve in any of those roles for a lot of institutions but we've said we can't do them all in one case. We can only do one. As advisors went, we just had our first advisor virtual training. It is interesting. I think on campus folks will do an amazing job at serving as an advisor. Their biggest concerns are, "I'm not a lawyer and everything you're talking about is so legally." We talked about how to ask questions and things like that.

Courtney Bullard:

But I think community members could do a great job. However, they are looking at situations where they're questioning their own colleagues. [inaudible 00:23:13] department potentially, obviously, community members who are students or staff and that is daunting. It's not through cross like we talked about in the training. It's not through cross but there's no direct. It was not through cross. We like to say questioning, but of course, you're trying to get to the bottom of any inconsistencies and things like that.

Courtney Bullard:

But if folks are going to contract to serve as external advisors, just like they're going to contract to serve as external decision makers or investigators, you really need to understand the campus community in general.

Courtney Bullard:

I know that was the third part of what we're going to talk about. But it is different than a court of law. It is different than what lawyers are typically trained to do. I think they will not serve the parties they're working with well if they come in guns ablazing, trying to do it through cross examination and destroy-

Elizabeth Canning:

They should be trained. I love that. I saw that. I love that you're doing advisor training and I'm just going to say, "People, go. Her trainings are great." It's so good because it's really practical and helpful and positive. These are the skills you need because that's what we need. We need the practical skills.

Elizabeth Canning:

Having served as a Title IX coordinator, my concern always is... When you think of that Title IX, what is it about? It's about making sure people are able to fully engage in your institution. When I would see advisors come in who would unfortunately not align... Again, it's different from challenging. Challenging is fine. That's your role. It is when there's a total disconnect between the actual process and what they wanted the process to be.

Elizabeth Canning:

People come in sometimes with such a fight, fight, fight approach, that I would have multiple conversations with one student. They talk with me and they'd feel good about where they were. They would talk to the advisor and then I get the very long multi paragraph advisor written language and then I connect with the student and say, "That's actually incorrect." And then they say, "Oh, I'm so sorry. You've been great." It becomes this tension.

Elizabeth Canning:

Those folks going through the process... It's difficult for everybody and it exacerbates what they're already going through and already their sort of mental health and status. Differentiating Again, I'm all for people pushing and making sure things are happening the right way. Yes, great.

Elizabeth Canning:

It's when again there's that disconnect. Being trained appropriately for the advisor role is really important. By the way, for your success for who you're working with because I've never seen it work. It doesn't help to have someone come in and light fires to light fires. It never actually pans out well because a good process is going to be steady and fair and equitable regardless of who the advisor is.

Elizabeth Canning:

But advisors only can mess things up if they cause their party to either struggle through the process or do things they shouldn't do just to play games.

Courtney Bullard:

I love that light fires just to light fires. That's such a good term because it's what happens. They want to cause noise just to cause noise and it doesn't serve them well. Advisor training, just for my listeners, is not required. We've put some in place and it's just the tip of the iceberg. There's a lot to serving as an advisor and you really have to know the process better than your parties and have a really good understanding of what's going on in this new space. So to not be trained, I would not want to be in that position.

Elizabeth Canning:

Yeah, I really recommend training.

Courtney Bullard:

[crosstalk 00:26:37] going on.

Courtney Bullard:

The roles that we've discussed that folks could be hiring externally that we're mostly saying are as investigator, decision maker, appellate decision maker, advisor, all potential external roles. As institutions are looking to hire external folks in any of those roles, what are some thoughts that you have on what they should be looking for? And do you think it has to be an attorney?

Elizabeth Canning:

No, I don't think it has to be attorney. I think it has to be someone very well trained. By the way, an attorney is well trained, too. Don't hire an attorney, by the way, just because they're an attorney. It has to be someone who... I always go back, like I said, it's my HR background. Knowledge, skills and ability to do the work.

Elizabeth Canning:

I guess, in this new frontier, where you're asking people who are... You will be looking at more external people is you need to find out if they have what you need at your institution. Every institution is going to do this differently. That's why going back to the first way of start looking at this is almost the job description of the role and then how do you make sure that the people you're talking to can fulfill that.

Elizabeth Canning:

I would recommend, honestly, almost doing little interviews with people. Short things. Just getting a sense of who they are and making sure that they actually... Also, I would say training. One thing that I have found is sometimes people will say, "I got this. I'm a lawyer. I know what I'm doing this Title IX world. I've taught it."

Elizabeth Canning:

It's one thing to know what the law is, it's another thing to bring it to life effectively in the compliance system in higher ed and probably any organization. This is just the one I think about. It's someone who has that knowledge of not only what the regulations say, but also how to bring them to life, how to be fair and neutral. If you're going to hire, for example, an external decision maker, do they understand?

Elizabeth Canning:

You and I talked about this. I'm former public defender representing juveniles. I've been in court so I'm fine with advocacy, I'm fine with dealing with this stuff happens in courtroom, back and forth, I get the play of the sequence of events. But conducting a hearing on a college campus, I went to training which was really helpful to say, "I want to make sure I'm thinking about this right way is what should this look like, what are other people saying."

Elizabeth Canning:

This is not the area to wing it. People who are going to be in these roles as external folks should be skilled and have the ability to go in there for you as an institution and do a really good job and be fully informed. That's why I would say having someone who's really trained to adjudicate, trained to investigate, someone who is making sure they are also neutral. I think one of the things that you're

going to look at in the regs and actually under cases is having anyone involved who is expressing bias and that has come up in various cases where they look at folks to determine if they have been posting things or are not able to be neutral.

Elizabeth Canning:

I think you really need to look at their background, their training, and interview to see if they are going to be compatible with your mission and that they can communicate with you because the other piece of this is... Any external person, you need to have a really good communication with and you have to be on the same page. They have to be someone that you can just pick up the phone and feel like you can communicate with easily because there are so many decisions sometimes that need to come up, that need to be made as an investigator.

Elizabeth Canning:

For example, "I'm having a hard time reaching this witness or this party. What do you want to do here?" Because you're looking at the clock. You have now in your policies spelled out all these steps and these time periods. You need to make sure you're working with someone who you're going to be able to communicate to adhere to those.

Elizabeth Canning:

I also would say working with external folks... And your question was whether they're attorneys, no, but they need to communicate well and I think the other piece is I know, as an external person, I want to make sure that I have my checklist of what I want, to make sure I've worked out with this institution. I'm thinking about a school where you have lots... So many people being trained or you having a lot of different internal and external folks.

Elizabeth Canning:

The other thing you need to think about is how do you make sure that the product is somewhat consistent because you're going to want to make sure that throughout your process the information is being looked at and treated somewhat consistently, that your format is consistent so that every report is somewhat consistent, that what you're gathering is somewhat consistent so that your hearing is coming out and it's being processed fairly consistently because all of that has to then be reflected in your notice of outcome.

Elizabeth Canning:

I think you need to think about how do I create my checklists or forms that I want my external people to use so that your product in your end is as consistent and fair as possible.

Speaker 3:

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Speaker 3:

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Speaker 3:

Finally, we partner with institutions and school districts to formulate an implementation strategy for compliance with the new regulations and as always, this service is provided to our community partners at a deeply discounted rate. Contact us today for more information on how we can serve you through this transition.

Courtney Bullard:

Yeah, I love how you summarize all that. I'm going to go back. I love how you say knowledge, skills, and ability to do the work. Again, do not have to be a lawyer. It helps. I think it helps in many respects but it's not the end all be all. There's plenty of really great people out there who could do the work who are not lawyers or former judges. I know a lot of folks are hiring former judges. Still great. I'm not saying they don't have the skills.

Courtney Bullard:

But it's not just the skills and it's not just the knowledge, you also have to have the ability... I love that you said it's not the area to wing it. As you heard me say in the training 100 times, no one has done this before, hearing like this before. It's just true.

Courtney Bullard:

I feel like whoever is hired externally needs to be so intimately familiar with the process as it's required under the regulations and with their policies and with the campus climate. Like you said, compatible with their culture, super important, because, again, just being an attorney is not enough. Being an attorney who understands this space... They don't have to have had worked [inaudible 00:33:52]. But how do you establish that relationship with that external individual as a campus so that you can ensure that they understand your process.

Courtney Bullard:

Universities are still figuring this out. You saw in the live training. This was just like last week where we would ask questions, "What are you guys doing?" And they're like, "We're not sure yet." They have their policies in place but we're just two weeks out from the implementation of the regs and everyone's still getting their ducks in a row, so to speak, on what intimately the process is going to look like for their campus.

Courtney Bullard:

So many folks when we talk to them and they're like, "We've got it figured out. We've got these decision makers, these investigators, these this." I'm like, "Yeah, but who is putting forth the notice of allegation? And then when the investigation's done, where does it go? And then is it the Title IX coordinators assigning it to the decision maker?"

Courtney Bullard:

All the minutiae that comes with these new regs and every step as you said trying to get all that figured out. It doesn't mean it won't be clunky no matter what you do, but at least as we figure all this out and navigate it... But I still think you've got to do that hard work up front and make sure your folks understand, that are external, how that's going to dovetail. I love how you said that.

Courtney Bullard:

And then also, making sure the product is consistent is the other thing that I wrote down because I run into this as external investigators and I'm sure you have, too, where I'm asking, "Do you have a form or template that you work off of for your reports? If so, can I have that to work off of?" Not to say that it can't be modified some. I sometimes think as external folks we got a little bit more leeway to do things differently if we need to.

Courtney Bullard:

But having those checklists, as you said, tons of steps in this process, tons of templates that are needed. We've got, I don't know, 10 already in our community access portal of templates for folks and we're still developing more. There are so many steps and so many nuances to this new process. Having a checklist for your external folks getting them your new policy early before case comes in, I think, and then how do you, like you said, make it all reflected in that notice of outcome at the end of the process is going to be huge.

Elizabeth Canning:

That's right. That is pretty specific. Because for example, you need travel to [inaudible 00:36:14] every step taken. If you have someone coming in who doesn't understand Title IX and that you're required to put in every single step they took and then they give you a report that's not included. You can, first of all, need to make sure that that's in there or have a form. You need to make sure they understand that because then you need to take time to send it back and to finish it.

Elizabeth Canning:

The clearer you are about what you need... The product itself in the sense of very cold term, and I say product because it's actually people's experiences so I want to acknowledge that this is... but what you're putting together for them has to be thorough and accurate and compliant. Make sure it's a better outcome, better product. But also, you're going to save time because if you have to go back and forth with this person, remember, you got that clock ticking and you want to make sure that you're on the same page.

Elizabeth Canning:

This goes to also prepping with [inaudible 00:37:09]. Don't just hire them. You need to do some this work in advance. As you've said, "Here's our policy. Here are the forms we'd like you to use," and put that in place.

Elizabeth Canning:

The other piece, and you raise this, about policy is... I've seen this working with a few schools where the policies are really long and I'm recognizing they may not know what is necessary at each step because again you can summarize all these things but as you said, who's doing what. It's almost like a computer

program where you need to... My daughter is doing coding a couple years ago and I use this as a great example of your process.

Elizabeth Canning:

You can list out what needs to happen but you have to also have this step by step coding of when you come here, who does it, and then where does it go, and who owns it. People need to get in a room or somehow get a big wall and map it out.

Elizabeth Canning:

It's step mapping because what you're going to see is the amount of work. You're going to have work ownership so you don't drop. You cannot. This is, I view, like clear yes of all the specific things you need to do. You don't want to have anything falling through the cracks.

Elizabeth Canning:

Step out. Map out every single step, all the minutiae, so that you know who's doing what and so that there's no gap because I've worked with schools where people aren't sure who does what and that adds to a delay. That's also impacting the experience of your parties.

Courtney Bullard:

Yes. This goes towards even if you don't hire external. I know you work with clients on this. That's what we've been doing in the implementation phase because we are huge on implementation. That's what I just wrote the blog post about. You cannot write your way to compliance, you can't train your way into compliance. There's way more things that have to be done and implementation is key.

Courtney Bullard:

We sit down and have virtual team trainings because we want them to be so confident in who picks up what when, like you said, work ownership and all that coding. That way at least when it hits, they've got a really good foundation. It doesn't mean it'll be perfect and it'll solve all their problems. But they've at least thought through it and done some tabletop exercises of how they need to flow/

Courtney Bullard:

But that's a step that I think especially right now when everyone has so much fatigue from COVID in the start of school and then the regs, everybody went a mile a minute all summer and everyone's catching their breath right now. But we absolutely have clients with cases right now. Of course, some of them haven't on August 14.

Courtney Bullard:

Even though COVID is happening in there, I don't think there's the same volume of cases, things are definitely happening. If you're a campus that has that moment to breathe right now, take it because I know everyone is so frazzled that's on the ground. I just commend them so much. But take this time to start really fine tuning all those steps and who's going to do what and the work ownership. And then if you have external folks that contracted with or you're considering it, it's almost like it's going to take even more work and time because it's adding a different element to your system.

Elizabeth Canning:

But if you had that in place, if you'd brought that to life and you've taken those steps, it can make working with external folks... Finally, as external folk, it's easier for me to work with schools because you have it in place because you want to minimize the number of bumps in your path. Because there are so many ways you can go, just minimize them especially as external roles.

Elizabeth Canning:

If you think about the external roles, they are pretty key roles. You do want to make sure you have minimized any of those bumps for them and that you have a really clear path for that relationship. As an external person, that's really important because that person is going to be preparing work product for you or something that you need to comply with the law.

Elizabeth Canning:

We want to do a good job. We want to make sure we're on the same page and we have the tools for you so that that's going to be huge for facilitating effective relationships with external folks.

Courtney Bullard:

The final thing I want to note, and you touched on earlier when it comes to hiring in these external roles, even if you're a campus that is not hiring externally across the board every time for decision makers or every time for investigation, you have everybody in place internally and that's the route you're going to go on the day to day. There are still situations that arise that, in my mind, necessitate but may necessitate hiring an external investigator, for example, or an external decision maker, even if that's not your plan under the new Title IX world.

Courtney Bullard:

You touched on conflicts of interest, high level folks being accused sometimes. There're just the folks on the ground and internally simply don't have the time to do the work because of their caseload and you need someone externally. Everything we're talking about certainly crucial if you are going to only do external investigators for all your Title IX matters.

Courtney Bullard:

But it's also something you should be thinking about no matter what because I always say you want to have someone in your back pocket or maybe two or three people in your back pocket as an institution that you know you could call on if a situation arises because when they happen, it happens quickly. You need to identify somebody quickly, make sure that they can take the case, and have the time as well.

Courtney Bullard:

If you've never ever, ever talked to any potential external folks, then you're starting from scratch. At least vetting them now and then if you never need them, great, but if you need somebody like a Courtney or Elizabeth, or Betsy, whomever, Scott, all these folks that I know out there doing it, then you've at least had the conversation and you're not starting from ground zero.

Elizabeth Canning:

So important. I would have those conversations and thoroughly, but not just like, "I know somebody." because you really want to make sure you're the right person. I would absolutely have those folks in place, absolutely connect with them. The combination of knowing each step... I have worked with folks

who are nervous that... You have a time period now. Your clock is ticking. You want to have all those pieces in place.

Elizabeth Canning:

I do want to stress please make sure you have people who are trained and understand Title IX. I can't stress that enough. Here's why. I had talked to a colleague who's starting to get into this work. Investigators have to give relevant evidence. The person was talking about, "I'm just going to give them everything. That's for them to decide." An investigation requires relevant evidence.

Elizabeth Canning:

You want to make sure you're working with people who understand what it looks like for you to do this work because if you're just given a ton of stuff and they haven't narrowed it down, that's going to be very confusing for the parties, the hearing officer.

Elizabeth Canning:

Everything leads up to that hearing and if you have people... If it's a ton of information now that the hearing's going to sort through or that they have to wade through, it's an efficiency thing. It is a consistency thing. It is an expectations thing. Making sure that what you're investigating for is consistent what you're going to hear for.

Elizabeth Canning:

The investigators job is to investigate pursuant to the regulations. The hearing officer can conduct a hearing pursuant to the regulations. But there has to be a consistency there around what we mean by relevant and that you're hiring people who understand that because you don't want to unduly burden the hearing process which is going to be tricky enough. You want to get to the hearing where it is you're gathering information. You're sharing evidence in a way that is clean enough that it's not murky at the hearing.

Elizabeth Canning:

Just making sure whoever you hire is certainly trained and I definitely hope to work with schools where they... I would say even working with your external folks and if you are new, to think about working with external folks. Talk with them, know what they need. You don't have to have all the answers, because this is new, but start working with that person saying... You don't want to have them lined up in advance so when you have to press go on something, you already have a clear path, that pattern, those steps you're going to take, you're on the same page already.

Courtney Bullard:

Absolutely. When you talk about training, we do training all day long, all summer, but we're still going to attend training in order to serve in these roles. I think there's so much benefit to that. We know a lot, don't get me wrong, but it never hurts to hear other perspectives and other colleagues.

Courtney Bullard:

I love having folks like you in our training because we have attorneys in our training all the time and they participate and it helps out the folks on the ground here in the training. They learn about what's going

on the ground as well. We're all in this together. I think it's great also to experience different folks' training.

Courtney Bullard:

I know there was a hearing where somebody asked an individual who's there, "What are your qualifications?" And that individual responded, "Oh, I took an online training last night. So I'm qualified." We want to be clear. I know you and I are like minded on this. Taking a training does not make you qualified. But training is a crucial piece. The more training and professional development you can do, the better. We know that can be challenging with resources and things like that. However, you want folks who are trained.

Courtney Bullard:

For us, we are, as a team, training whole cadre of attorneys for one institution but I think that's awesome. I think it's so great that they've thought about that and are trying to streamline and make sure everybody's on the same page.

Courtney Bullard:

Along those lines, I think my last question for you is, who hires these folks? For us, we're engaged by the general counsel's office sometimes. Sometimes, the contract... It's really the relationships with the Title IX coordinator although different folks are signing the contract. I know we've a lot of attorneys that listen to this.

Courtney Bullard:

My opinion, and then I want to hear yours, but our attorneys... We're both practicing attorneys as well. Getting hired as a lawyer, there's a lot to think about that I think sometimes gets lost and one is, who you're hired by? And is it by attorney-client privilege? Or is it attorney-client work product?

Courtney Bullard:

I always go into everything with the thought that everything is discoverable because I'm all about transparency for institutions and if you're going to be doing an investigation, obviously, now we've got all these things where the party see everything.

Courtney Bullard:

But what about those communications you're having as an investigator with the Title IX coordinator or what have you. I go through this a lot with folks and saying, "That's fine if you want to try to put this under the attorney-client umbrella," and especially in your space, that happens a lot. It's different.

Courtney Bullard:

But I think that's something that needs to be established from the front end and manage expectations on the front end. What are your thoughts on all that or your experience?

Elizabeth Canning:

Totally agree. Step one, if that is your goal to have an attorney-client relationship, certainly, you put that in the contract. You have to establish that first in the agreement. That's part of it. You have to understand what it means, too.

Elizabeth Canning:

If you're working with somebody and they periodically put that in there, "It's attorney-client now." It's the invisibility cloak. You can't just put that on and off. You have to be really clear about... First of all, people understanding when it is attached, I think people to be very thoughtful about that. Because even if you put that out there, if it's not genuinely attorney-client, it's not genuinely attorney-client. But some people don't understand what it means.

Elizabeth Canning:

I think I always operate an assumption. [inaudible 00:48:59] people should that it's all discoverable anyway. I think you have to be consistent in the purpose of that relationship. I do ask people, "Say, I'm just doing an audit or something." I'm always very clear like, "What is your end goal with this?"

Elizabeth Canning:

I think sometimes, institutions, making sure we work with them to make sure that's the first conversation we have is, "Let's slow down a little bit." Because sometimes we're called in when there's a lot of heat and people are like, "I got to fix this." The first conversation is, "Let's just make sure we're clear about the purpose here and what's your end goal with whatever I'm going to do. Where do you envision this going?" That served that first conversation.

Elizabeth Canning:

The challenges for some of these investigations is the report goes to people and they're going to see some of these things. It's hard to say.

Courtney Bullard:

You just got to be ready for that. I think it should be that way. That's what I try to tell folks.

Courtney Bullard:

But there are times on the HR side especially where you're doing an investigation, you're not under all the requirements of Title IX and you're doing it at the direction of general counsel because of the potential for litigation. The report might be shared, but not everything and you might be coming out with other recommendations that are not going to be public knowledge. It's definitely appropriate in some situations.

Courtney Bullard:

But I love what you're saying and I totally agree. You really got to establish out at the outset. You can't just decide to flip a switch in the middle and say, "Wait, I need everything to be attorney-client going forward."

Courtney Bullard:

I love what you're saying too and I'm using the word love a lot today. Anyways, what you're saying resonates with me because it's something that really... I don't know that I would have thought about as much in the work I'm doing now had I not served as in house counsel and had that perspective to really think about that all the time and really learning from our colleagues about that because as in house counsel you're thinking about it all the time when you're interfacing with your own client.

Courtney Bullard:

For those who are general counsels listening to this or external attorneys, help them out by thinking through just what you said. What is the purpose of this? How is this report going to be used? Where's it going to go? Are you doing an executive level summary? That's like going to the board of directors or the board of trustees, but everything else is privileged. If you do that, what are the implications of that? Like you said, if it's a hot issue where there's a lot of press surrounding it, which we've had many of those, just being very intentional with the relationship and what it's going to look like and memorializing that, I would say.

Courtney Bullard:

So many things to think about. I'm telling you. This is a whole thing. This is why we're doing the podcast and why you and I got in the conversation and I love talking to other folks who do that like we do because there's so much to think about. I'm not perfect. We all have experiences we've learned from... I always say there's no substitute for experience. We learn a lot from that and then we can share our pros and our cons and our lessons learned so other people don't end up in the same boat.

Elizabeth Canning:

I think that's really important because this work... Again, I always go back to it's so easy just to read the regs and say, "I see what it says," but to live it, it's a whole different thing. It's nice to have a community of folks where we're all talking about this because being engaged and continuing learning about it is really important. Otherwise, there's going to be... The one voice is not good. There's so much ways of thinking about this. [crosstalk 00:52:25].

Courtney Bullard:

This is not a game of got you like, "ICS has all the answers. We're going to give you only these people, some of them and then so and so organization, they only have these answers."

Courtney Bullard:

Like I know with the regs, so many folks on the ground and I hadn't again, another LinkedIn post about this. There's so much information. It's overload. It's amazing. I love that we have so many colleagues in the space doing amazing work and that there's options for institutions. I love that. I feel like that is a great thing.

Courtney Bullard:

But it also can be paralyzing for the folks on the ground because they're getting information from so many places and they're so afraid of missing something. They're trying to contrast and compare it. I had one Title IX coordinator who's like, "I've literally listened to every webinar out there [inaudible 00:53:11] so it's possible." And I'm like, "But you still have all this work you have to do." And she's like, "I know. And I haven't even started because I'm trying to make sure I've hit everything." This is just another area where you really need to be thinking about it.

Courtney Bullard:

I think if you're a Title IX coordinator listening, getting with your general counsel's office, if you have one, to say, "What's our plan if we need the service in the future?" If you're not doing it now, and then for those of you who are hiring external, going ahead and getting all that put in place, I think, is huge. It

doesn't have to be us. We've got lots of good folks to recommend as well. But making sure you have folks who are well trained and have the experience and the knowledge and the ability.

Elizabeth Canning:

One thing I would say to just tie into that. I could talk all day. But the one last thing is... Building on that, one of the things I'm sure you've seen too is sometimes folks in this role... Why people have sometimes been like, "Oh?" They haven't understood how important it is to make sure that Title IX office has what it needs to do its job. Part of the problem, I think, it was in higher ed. We just do everything where it's like, "I got it."

Elizabeth Canning:

Here's what I would recommend anyone doing Title Nine work trying to figure out how do I tell my story to advocate for myself to get the resources I need. I would definitely list out the different stages, what you need, and how long that could take. Best guess. This is a new frontier, I realized that. We don't necessarily know.

Elizabeth Canning:

But I think trying to find a quantifiable way to tell your story about what work it takes to comply because in the end, that is what the school needs to know. Sometimes, we are so dedicated trying to help out that we forget to say, "You know what? I need to ask. I need to be clear," because administration will respond when they see it in a concrete way. Think about how to present that information based on people hours, resources, cost to advocate for whatever you're looking to advocate for. But do, do that. Again, administration likes quantifiable pieces of information.

Courtney Bullard:

Betsy is big on tracking patterns and trends. She's got a whole course on it. We've done all this stuff. But I never thought about it from this. Of course, she's talking about more... Initially, I've learned a lot from her about preventative measures, of course, and prevention, which is something I've talked about with Joe Stuart on a prior podcast.

Courtney Bullard:

But the other benefit of that for Title IX coordinators is that quantifiable going to leadership to say, "This is how many hours investigations are taking. This is how many days cases are taking from start to finish. This is how many hours per person that's taking. This is where we're seeing..."

Courtney Bullard:

Taking, like you said, all that quantifiable information forward to say we need another person or we need to hire externally to fill this gap, or what have you, can have so many benefits. I appreciate you bringing that up because it's really important and I know with, right now, everybody fighting for every last drip of resources that exist with the COVID being such a strain, having that data, especially as we go through this school year under the new regs, is huge.

Courtney Bullard:

Love it. We could talk about a lot of other topics and I know that and I'm sure we will, again, as all my guests, I'm like, "Ooh, I want to have this person back to hone in on this one area." Same with you. But I

want to wrap this up, is there anything else that comes to mind that we haven't touched on that's really burning for you to bring up for our listeners? We touched on most everything.

Elizabeth Canning:

I think we did. I would definitely just wrap it with the best way to work with folks is as concrete as possible. That's why I definitely get a sense of what you need, what that looks, good communication, get your own forms and stuff ready, have your checklists, minimize those bumps and gap. There are so many great people out there who do this work. I would say the more I heard you talk about people who are listening to different webinars or training is also finding ways to then talk to those resources that help you feel good.

Courtney Bullard:

I say that resonate with you. I'm like, "Do what resonates with you and that makes you empowered to do a good job, not makes you feel like you can't do this."

Elizabeth Canning:

Exactly. Really find that. If you don't have a network of Title IX coordinators, for example, or if you don't have those people go to people, I have definitely worked with different Title IX coordinators where I start chatting with them and I realized like, "They're on the island. They need to connect with people." This work is doable. We are all working through it. Find the people who help you get there and are in your pit because I think that's the other challenge to doing this work.

Courtney Bullard:

Lean into that Title IX community and find some folks that you can talk to is huge.

Courtney Bullard:

Let's end with a couple fun facts and I'm going to mix it up a little bit since we are in COVID world and quarantine land in all those good things. What has been your favorite thing that you've done through quarantine? What has been your break from all of this?

Elizabeth Canning:

Learning to work through internet outages. Favorite thing. We have picked up, probably like everybody, board games. We are prolific board game players and I've tackled some board games which I thought were impossible. Now, we've got them down.

Courtney Bullard:

My 10-year-old would love you. She's a gamer. She wants to play any card game, board game. You name it. Loves it.

Elizabeth Canning:

Oh, I got a list. Oh, yeah. Love to know what you all have been playing. It's been great family time too, just to engage and to spend time together and make fun of each other.

Elizabeth Canning:

The other piece is just trying to be outside. I'm lucky I have a little backyard. As you may know, I'm a beekeeper. I have been getting outside. It's been a very good season for bees. A ton of honey. I'll send you some. It is-

Courtney Bullard:

Please just send me some honey. I can't believe I didn't realize you're a beekeeper because this is fascinating me and I just want a whole podcast on it. We got killer bees but then I've hearing about how bees are in danger. I did not realize that if bees no longer existed, the world does not exist. I did not know this and I had to go Google it and then do fact checking if someone told me that. I'm like, "What? That's not true." I'm like, "Oh my gosh, it's true." There's the shortage of honey.

Elizabeth Canning:

The bee's knees. You can help the bees either... They talk about backyard but there's so many other... You get the honeybees which do very specific pollinating for almonds. There's some that only honeybees can do. But then you've got a whole other world of pollinators too, like bumblebees. You got little wee bees. All different ways.

Elizabeth Canning:

I always tell people if you don't want to be beekeeper... That's only one type of the pollinators. Plant great pollinator friendly plants because that help sustain them, that gives them food and helps them survive. Just plant some pollinator friendly plants regardless of bees because they're all essential.

Courtney Bullard:

Two questions I have to ask because I just have to. Sometimes, listening to podcasts, it's just fun to listen to other things besides Title IX. Number one, how in the world did you get into this? And then number two, I need to know what plants are bee friendly plants and then I promise we'll wrap it up for our listeners. I'm fascinated.

Elizabeth Canning:

My dad, it was one of his hobbies and I remember just thinking it was so cool. He would literally pull out a frame of honey and we would just eat it right off the frame. It is hot, yummy honey and the wax. I remember being fascinated by that.

Elizabeth Canning:

And then I would definitely say getting older, I started doing this maybe six, seven years ago being concerned, of course, hearing about the bees and saying, "You know what? I think it's really fascinating." My daughter was five or six at the time. I thought, "This would be really cool for her to see." I love honey. It's just an incredible thing.

Elizabeth Canning:

I got into it myself and I have had terrible... I'm not the best. It's a really good lesson because you can't control bees. You can't tell them to social distance. The bees just do whatever they're going to do. It allows you to say, "I can just sometimes being hands off with the bees is the best thing sometimes getting in there and trying to fix things." But it is very difficult for me to keep a bee season to season. I

don't always have great honey production but for some reason, this season's been crazy good. A whole lot.

Courtney Bullard:

That's so cool. You know that Betsy on my team. Her son is in first grade. They had locked down at their school this week because of a bear on the playground. I've just decided that because of COVID and us not out there driving around destroying the environment all of a sudden, like you said, you've had a great bee season. Bears are on the playground. I don't know what's going on. Nature is happy. They're like okay.

Elizabeth Canning:

Nature is like, "Thank you for not driving your car so much. Thank you."

Courtney Bullard:

Oh, I'm so fascinated about this bee keeping. And then flowers. What are the flowers?

Elizabeth Canning:

The flowers. [inaudible 01:02:15] region. I'm in New England, I'm in Rhode Island. Like Echinacea. They love Echinacea. They love bee balm, especially bumblebees. Lavender is huge. I'm sure there's... Oh, my gosh. Lavender... I have to make a list.

Courtney Bullard:

It's okay if you can't remember them all. I just wanted to see that I could... I'm going to have to go do some looking and make sure as we're doing our fall planting I'm cognizant of it.

Elizabeth Canning:

Crazy one I just saw recently which we're going to plant is something called mountain mint. We were walking by someone's house the other day and it was covered with bees cut in with other pollinators, butterflies, these giant wasps, and bumblebees. And then something called butterfly weed which is orange and they love that. I love butterfly weed.

Courtney Bullard:

I'm fascinated. You know that one of our pictures promoting this podcast will have to be bees because I think that's so cool and so interesting. I'm so glad you shared it because, listen, that's a really good thing to be doing during quarantine. I'm sure that was extremely relaxing.

Elizabeth Canning:

Very. Just stare at my bees.

Courtney Bullard:

Love it. So cool. You're going to have to send me some pictures after this too.

Elizabeth Canning:

I will. [crosstalk 01:03:24]. I'm going to send you videos and you'd be like, "Okay, [crosstalk 01:03:28]."

Courtney Bullard:

I want it all. I'm not even kidding. No, I want it all. I want to show my kids, too.

Courtney Bullard:

I so appreciate the time with you and you have explained some of these things. This is a complex issue, but of course, love learning about the beekeeping [crosstalk 01:03:42].

Elizabeth Canning:

I had so much fun.

Courtney Bullard:

We're going to have to have more conversations. I know, I love it.

Elizabeth Canning:

I look forward to many more. But this is super fun. [crosstalk 01:03:49].

Courtney Bullard:

Say again the name of your business for the listeners.

Elizabeth Canning:

It's Elizabeth H. Canning, Campus and Workplace Solutions.

Courtney Bullard:

We'll make sure it's in the show notes to link to your business and I know we will talk again offline and I will definitely have you on again. [I love your term living the rags. I'm totally stealing it.

Elizabeth Canning:

It's all yours.

Courtney Bullard:

I'm not stealing because I'm telling people I got it from you. But I love that. As we start living the regs, though, and as institutions are living the regs, we're going to have so many more things to talk about. Definitely will want to have you back on and I appreciate you so much. I hope that you have a great holiday weekend.

Elizabeth Canning:

That's right. You too. That's right. It's a holiday weekend.

Courtney Bullard:

Please stay in contact with us through all of our social media sites. We're on LinkedIn. We both have. We have an ICS page but we also have my page as well as one for Betsy Smith, Instagram, Twitter, and Facebook. We have a Facebook page for Title IX coordinators. We'd love to have you join. One also specifically for K12 Title Nine coordinators. You should look for that.

Courtney Bullard:

If you're enjoying this podcast and these episodes, please subscribe, rate, and review. That would be super helpful. Finally, as always, we're here to serve you. If there's anything that you need from us, please do not hesitate to reach out. Stay safe and stay well and we'll see you next episode.

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