

The Art of Facilitating the Informal Resolution of Sexual Harassment Cases

September 29 & 30, 2021

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Meet Your Faculty



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Disclaimer

The information provided in this training does not, and is not intended to, constitute legal advice; instead, all information, content, and materials available during this training are for training and general informational purposes only.

September 29, 2021



1. Informal Resolution Overview
2. Mediation in the Context of Title IX and Pre-Mediation Prep
3. Role of the Mediator & Setting the Environment
4. The Mediation – Critical Steps & Considerations
5. The Mediation – Fundamental Skills
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September 30, 2021



7. The Mediation – Party Proposals & Ethical Considerations
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#1

Informal Resolution Overview



Informal Resolution

Under The 2020 Amendments

Informal resolution is permissible in lieu of the investigatory and/or hearing process. §106.45(b)(9).

- After a formal complaint is filed.
- The parties voluntary agree in writing to resolve the case through informal resolution.



Voluntariness





Informal Resolution

Under The 2020 Amendments (con't)

- The Title IX Coordinator deems informal resolution appropriate.
- Limitation: Informal resolution can never occur when the respondent is an employee, and the complainant is a student.
- Informal resolution processes must have reasonably prompt timeframes.



Informal Resolution

Under The 2020 Amendments (continued)

- Informal resolution can be facilitated any time prior to reaching a determination regarding responsibility.
- A respondent's admission of harm or acceptance of responsibility is not required.
- The parties must receive written notice that discloses certain information that is often included in:
 - The policy
 - Notice of Allegations, and/or
 - Voluntary Consent to Informally Resolve the Formal Complaint



Written Notice

Institution MUST provide written notice to the parties disclosing the:

- Allegations. §106.45(b)(9)(i)
- Discussion about the availability of informal resolution. §106.45(b)(A)

RESOURCE

Sample policy language The Informal Resolution Process



DE CARLO



Written Notice: Requirements

- Requirements of the informal resolution process.
§106.45(b)(2)(i)
 - Voluntary consent; without coercion. §106.45(b)(2)(ii)
 - Can withdrawal any time before resolution agreement reached. §106.45(b)(9)(i)
 - The circumstances that preclude the parties from resuming a formal complaint. §106.45(b)(9)(i)
 - Facilitation by neutral, objective and trained facilitator.
§106.45(b)(1)(iii)



Written Notice: Requirements (con't)

- Consequences from participation in informal process
 - The records that will be maintained or that could be or could not be shared. §106.45(b)(10).
 - Records relating to informal resolutions and the result thereof must be maintained for at least seven (7) years. §106.45(b)(10)
 - The records that could be or could not be shared. §106.45(b)(10).
 - Resolution agreement subject to a subpoena.
 - Resolution agreement maintained as educational record.



Range of Conflict Resolution Strategies

- The types of informal resolution processes available under your policy. §106.45(b)(2)(i).
 - Informal resolution may encompass a broad range of conflict resolution strategies, including but not limited to:
 - Remedies-based resolution
 - Respondent accepts responsibility
 - Mediation
 - Restorative justice
 - Arbitration



Written Notice: Consequences (con't)

- *Recommended additional “consequences” to participation*
 - Whether there is confidentiality within the informal resolution process.
 - Whether facilitator will be called as a witness in the formal grievance process if informal resolution fails.
 - Facilitator’s right to end the mediation for good reason.
 - Title IX Coordinator may reject any agreed-upon resolution if it is unreasonable or inequitable.
 - Right to appeal?



Appeal

Informal resolution agreements may or may not be subject to appeal.

- On the one hand, §106.45(b)(8) states that recipients must offer both parties an appeal from determinations regarding responsibility, or from a recipient's dismissal of a formal complaint or any allegations contained in a formal complaint.
- But, *Preamble* states, "Importantly, the final regulations require recipients to offer both parties an appeals process to help mitigate risks such as procedural irregularity and investigator, decision-maker, or informal resolution facilitator bias." *Preamble*, p.1374 (Federal Register version)

What are the reasons a party would want to challenge a resolution agreement after the fact?

CHAT

RESOURCE

Template

Voluntary Consent to Informally Resolve the Formal Complaint

QUESTIONS?



Facilitator's Role

- The facilitator has no power to render a resolution to the matter – only the parties do.
- The facilitator brings the parties together,
- Encourages and guides meaningful dialogue between the parties, allowing each party to feel that they have been heard,
- Helps uncover the parties' underlying needs and interests, and
- Leads the parties toward an amicable resolution.



Facilitators Free of Bias/Conflict of Interest

Facilitators of informal resolution MUST:

- Facilitate impartially (independent, neutral and objective)
 - No conflicts of interest. §106.45(b)(1)(iii).
 - No bias for or against complainants or respondents generally or an individual Complainant or Respondent. §106.45(b)(1)(iii).
 - Avoid prejudgment of the facts at issue. §106.45(b)(1)(iii)

**Should a Title IX
Coordinator
facilitate informal
resolutions?**

CHAT



Facilitator Training

Facilitators of informal resolution MUST undergo "robust" training.

➤ Training topics include:

- The §106.30 definitions of sexual harassment.
§106.45(b)(1)(iii)



Title IX Sexual Harassment (§106.30)

Sexual Harassment is conduct based on sex that satisfies one or more of the following:

- Quid Pro Quo harassment. An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct.
- Hostile environment harassment. "Unwelcome conduct determined by a reasonable person to be so severe, pervasive, *and* objectively offensive that it effectively denies a person equal access to the school's education program or activity."
- "Sexual assault," "dating violence," "domestic violence," or "stalking" as those terms are defined under the Clery Act and VAWA



OCR Definitions of Sexual Harassment

Office for Civil Rights Blog - 20201007

THE DEFINITION OF SEXUAL HARASSMENT UNDER THE TITLE IX RULE PROVIDES CLARITY TO SCHOOLS

October 7, 2020



The new Title IX Rule went into effect on August 14, 2020. Since that time, the Office for Civil Rights (OCR) has received inquiries regarding the definition of sexual harassment under the Final Rule. All references and citations are to the unofficial version of the Title IX Rule, which is available [here](#). A link to the official version of the Rule published in the Federal Register is [here](#).

Sexual harassment under Section 106.30 of the new Title IX Rule (found in the Code of Federal Regulations at 34 C.F.R. Part 106) means conduct on the basis of sex in an education setting that satisfies one or more of the following:

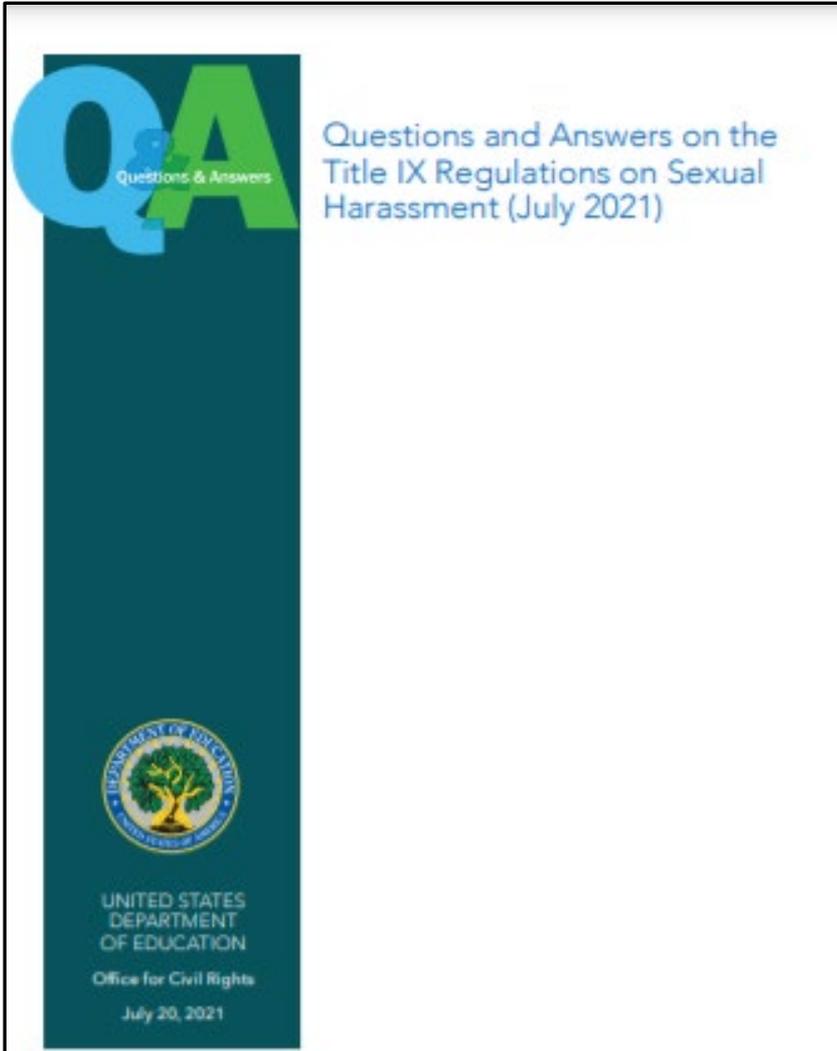
1. An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity; or
3. "Sexual assault" as defined in 20 U.S.C. § 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30).

34 C.F.R. § 106.30(a) (defining "sexual harassment"). The first category of the above definition is commonly referred to as "*quid pro quo*" harassment. The second category incorporates the Supreme Court's standard for actionable sexual harassment in the landmark case of *Davis v. Monroe County Board of Education*, 526 U.S. 629 (1999). And the third category refers to the Clery Act and the Violence Against Women Act to define four terms: "sexual assault," "dating violence," "domestic violence," and "stalking." When conduct on the basis of sex meets one or more of these three categories, the conduct is "sexual harassment" under the new Title IX Rule. As a reminder, in order for sexual harassment to trigger a school's duty to respond under Title IX, the school must have actual knowledge of sexual harassment in the school's education program or activity, against a person in the United States. 34 C.F.R. §

<https://www2.ed.gov/about/offices/list/ocr/blog/20201007.html>



Q&A on Sexual Harassment Definitions



<https://www2.ed.gov/about/offices/list/ocr/docs/202107-qa-titleix.pdf>



Facilitator Training Topics

Training topics (cont.):

- The scope of the institution's program or activity.
§106.45(b)(1)(iii)

Locations, events, or circumstances over which the recipient exercised substantial control over both the respondent and the context in which the sexual harassment occurs.

Also includes any building owned or controlled by a student organization that is officially recognized by a postsecondary institution.



Training Topics (continued)

- How to conduct an informal resolution process. §106.45(b)(1)(iii)
- The §106.45 formal grievance process.
- The Institution's policy against sexual harassment and discrimination (generally).
 - Institution's definitions of "Consent," "Incapacitation," and "Retaliation."

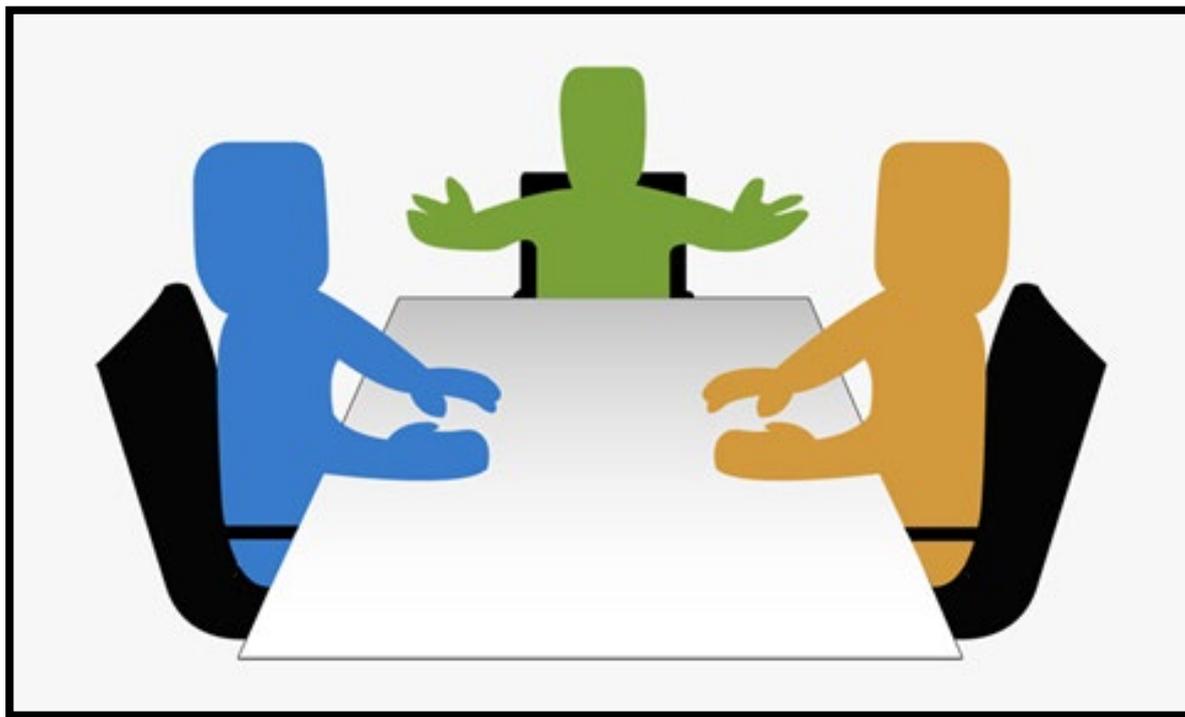
Why should the facilitator know the sexual harassment definitions and the grievance process?

CHAT

QUESTIONS?



Title IX Cases Conducive to Informal Resolution





Limitations

No limitations on the availability of informal resolution except:

- Institutions must not offer or facilitate an informal resolution process to resolve allegations that an employee sexually harassed a student. §106.45(b)(9)(iii)



To informally resolve or not?

Just because you can facilitate informal resolutions in all other Title IX sexual harassment cases doesn't mean you should.

- Amenability for informal resolution should be conducted on a case-by-case basis.
- Title IX Coordinator remains in control over decision to allow informal resolution and when to allow it.



Title IX Cases Generally Conducive to Informal Resolution

Cases *generally* amenable to Informal Resolution:

- Hostile environment sexual harassment cases between employees or between students where little to no power differential.

- Non-sexual harassment cases:
 - Retaliation

 - Sex discrimination (including pregnant and parenting discrimination)



Title IX Cases Generally Conducive to Informal Resolution - EXAMPLES

- Lower-level sexual assault cases.*
- Sexual assault cases resulting from miscommunication.*
- Dating/domestic violence cases where mutual harm is alleged.*
- Stalking potentially connected to a mental health or personality disorder.

*

Sexual/dating/domestic violence cases are the most challenging to informally resolve due to the nature and intimacy of the harm and the power imbalances often associated with these offenses. Accordingly, proceed with caution.



Title IX Cases Generally Not Conducive to Informal Resolution

Cases *generally not* amenable to Informal Resolution:

➤ Alleged offenses involving:

- Physical or threatened violence,
- Predation,
- Intimidation,
- A dangerous pattern of conduct, or
- Where the power differential between the parties, under the circumstances, could exacerbate the harm.³⁷

QUESTIONS?



BREAK

#2

Mediation in the Context of Title IX
and Pre-Mediation Prep



The “Collaborative Process”

Mediation as a “collaborative process”



**What do you see as
the value of informal
resolution for sexual
harassment cases?**

CHAT



Mediation – The participants

Participants within the Informal Resolution Process:

- The Complainant(s)
- The Respondent(s)
- The Facilitator
- Advisors (maybe)



Mediation – The Characteristics

As a reminder:

- Voluntariness
- Informed written consent to participate
- Impartiality of facilitator
- Party control over outcome
- Confidentiality (optional)



Mediation – The Types

- *Facilitative* - conducted by third-party neutral with no authority to propose a solution or opine on issues.
- *Evaluative* - conducted by third-party neutral who may give opinions and propose solutions.
- *Title IX Hybrid* – facilitative with measured evaluation and proposal of solutions.



Pre-Mediation Communication

Contact with the Parties

- Email or call to set up pre-mediation conference
- Pre-mediation conference
 - 5-7 days before mediation
 - Mediator = Complainant
 - Mediator = Respondent
- Memorialize all contact



Pre-Mediation Conference

Do

- Introduce yourself
- Get to know the party
- Explore comfort/discomfort
- Explain role – neutral facilitator
- Explain compromise is often a part of the process
- Discuss freedom to withdrawal from the process

Do

- Explain process
- Explore the goal
- Explain option and role of advisor
- Explain confidentiality
- Invitation to share feelings and thoughts
- Invitation to share substance?



Exploring feelings and thoughts

- Exploring feelings and thoughts...
 - Try to understand the parties' motivation to participate in the informal resolution process.
 - *"How would you feel if we are unable to reach an agreement?"*
 - *"What is the best result for you?"*
 - *"If you couldn't achieve the best result, what will you need to feel comfortable about resolving this complaint?"*



Inviting Substance?

- Discretionary to invite substance regarding the allegations...
 - *“Here are the materials I’ve reviewed before speaking with you...”*
 - *“Is there any additional information you wish to share with me that you believe would be helpful to resolving the formal complaint?”*



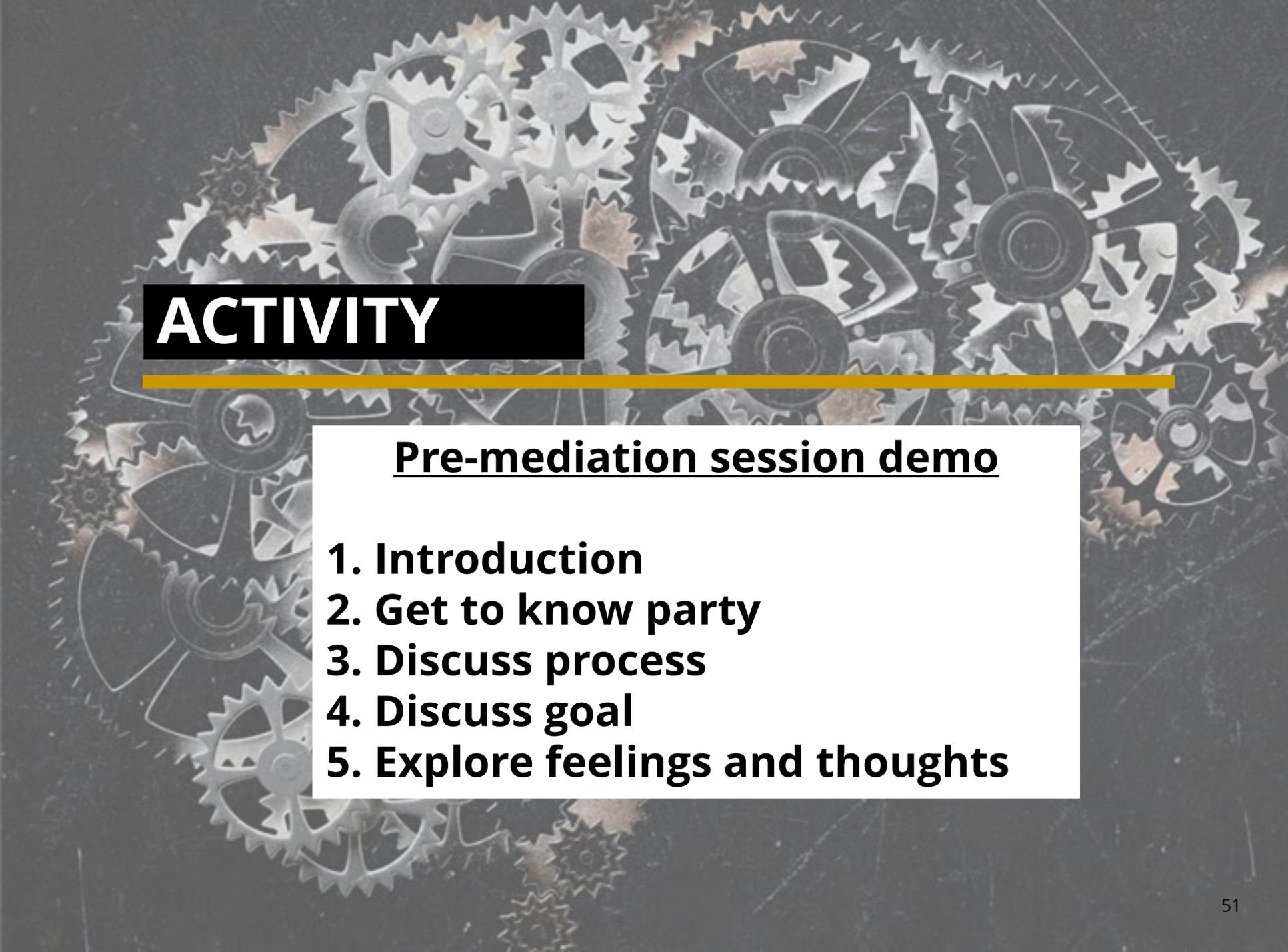
Pre-Mediation Communication with Parties

Don't

- Pre-judge issues
- Predict outcome
- Discuss conversations with other party

Don't

- Sound rigid, managerial, controlling
- Evaluate claims of either party
- Discuss what other party/observers/witnesses say
- Overload



ACTIVITY

Pre-mediation session demo

1. Introduction
2. Get to know party
3. Discuss process
4. Discuss goal
5. Explore feelings and thoughts



Pre-Mediation - Preparation

- Read materials
- Outline strong facts and weak facts for Complainant (weak facts for Complainant are strong facts for Respondent and strong facts for Complainant are weak facts for Respondent)
- Determine how to structure mediation
- If possible, determine expectation of parties
- If facilitator is not the Title IX Coordinator, Title IX Coordinator may have helpful information



Pre-Mediation - Evaluation

- What are the undisputed facts?
- The human element
 - Who, if either, do the facts favor?



Pre-Mediation – Framing the Issues

- What are the issues?
- Determine if there are issues outside of the Complaint and Respondent.
- Do the parties see the issues differently?



Pre-Mediation – Focusing on Objectives

- Where might compromise be achieved?
- What are the respective party objectives?
- What might the ultimate agreement look like?



Pre-Mediation - Strategy

- Who do I talk to first?

- What will I address in the first session with each of the parties?
 - Undisputed facts
 - Non-threatening issues
 - Confirming objective(s) of each party
 - The parties' ideal outcome

- When and how will I address the more sensitive facts?



Creating the environment





Creating the Physical Environment

- The venue
 - Ensures privacy/confidentiality
 - Is not intimidating
 - Comfortably accommodates multiple participants
 - Not a busy place

- The rooms
 - Sufficiently separated from one another
 - Large enough to be comfortable
 - Extra room necessary

- Administrative
 - Computer, copier, etc.



Creating the Virtual Environment

- Structure the start
 - Parties to join at different times
 - Discuss the success of virtual mediation

- Explore:
 - Is anybody with or intending to be with party
 - Need to get comfortable with technology

- The pragmatics
 - Get cell numbers from all participants
 - No recording by anybody
 - Insist on live video
 - Clarity of visual image



Pre-Mediation – Personalizing

- Preparation pre-mediation is essential
 - Anxiety
 - Relief
 - *"I want to go."*

- Alternative results

CHAT

**Mediation preparation:
What are your reactions
and additional
recommendations?**

QUESTIONS?

#3

Role of the Mediator as the
Communicator



Personality & Communication Strengths

Personality Strengths

Tolerant
Thoughtful
Practical
Collaborative
Respectful
Empathetic
Intuitive
Self-Aware
Creative
Non-Judgmental
Open-Minded
Credible

Communication Strengths

Characterize but don't criticize
Clarity
Emotional control
Simplicity trumps complexity
Facts are foundation to persuasion
Eye contact
Relaxed tone
Avoid negative body language
Avoid negative verbal reactions
Avoid negative facial expressions



Facilitator: Communicator and Neutral

- Empathetic listening
- Paraphrase and summarize
 - *"I want to make sure I understand, it is rare for you to drink in excess."*
 - *"You were embarrassed to tell your roommate."*
- Validate
 - *"Not wanting to tell someone else is not unusual. It happens all the time."*



Facilitator: Communicator and Neutral (con't)

- Avoid negativity
 - *"He/She doesn't understand the seriousness of what he/she has done."*

- Participatory empowerment
 - *"What would you like me to tell him/her about how you are feeling?"*
 - *"What do you want me to say to him/her about the fear you continue to have?"*



Facilitator: Evaluator

➤ Subtle opinions

- *"I know you don't want to agree to these restrictions but if we don't reach an agreement, you risk more severe restrictions imposed by others."*
- *"These particular facts may not be helpful to you..."*
- *"I believe he/she is both remorseful and embarrassed."*

**Going into
mediation...**

***What might be
Complainant's
perspective?***

CHAT

**Going into
mediation...**

***What might be
Respondent's
perspective?***

CHAT

QUESTIONS?



BREAK

#4

The Mediation – Critical Steps and Considerations



Avoid Joint Sessions with Parties

- Mediation historical perspective on joint caucus
- Dynamic of parties meeting in joint caucus
- Will it ever be appropriate to bring the parties together in a joint caucus?



Framing Issues

- What you understand the issues to be.
- Probing whether we can achieve an "agreed" outcome.
- Session is not whether complainant can prove her/his allegations.
- Facts are important to an extent.



Establishing Common Grounds

- What are the facts not in dispute?
- What do parties individually hope to accomplish?
- Why is it important to reach an agreement?



Searching for Shared Values

➤ Subtly probe

- Do each hope an agreement can be reached?
- If agreement reached, what if any relationship will exist with the other party?
- Are there underlying interests?



Establishing Credibility

- The mediator
- The process
- The agreement



Maintaining Confidence

- It is a process, not an event.
- Patience is key.
- Report where progress is being made.
- Sharing positive aspects of what you have heard and observed.



Party Advisors

- Advisors:
 - Victim advocates, parents, roommates, friends, school employees, or lawyers

- Role can be restrictive

- A role of support and collaboration

- Aider v. barrier
 - Using an advisor to benefit the process
 - Handling the challenge

- Communication with Advisors outside of parties

QUESTIONS?



BREAK

#5

The Mediation - Fundamental Skills



Fact exploration

- Inviting a narrative to elicit perspective...
 - Encourages party to open-up, vent, and articulate.
 - Allows story to be told.
 - No need for interrogation on the who, what, when, where, why, how, describe, explain, tell...
 - Understand relationship between the parties.
 - Obtain enough facts to assess strengths and weaknesses of the case.



Fact exploration techniques

➤ General exploration questions:

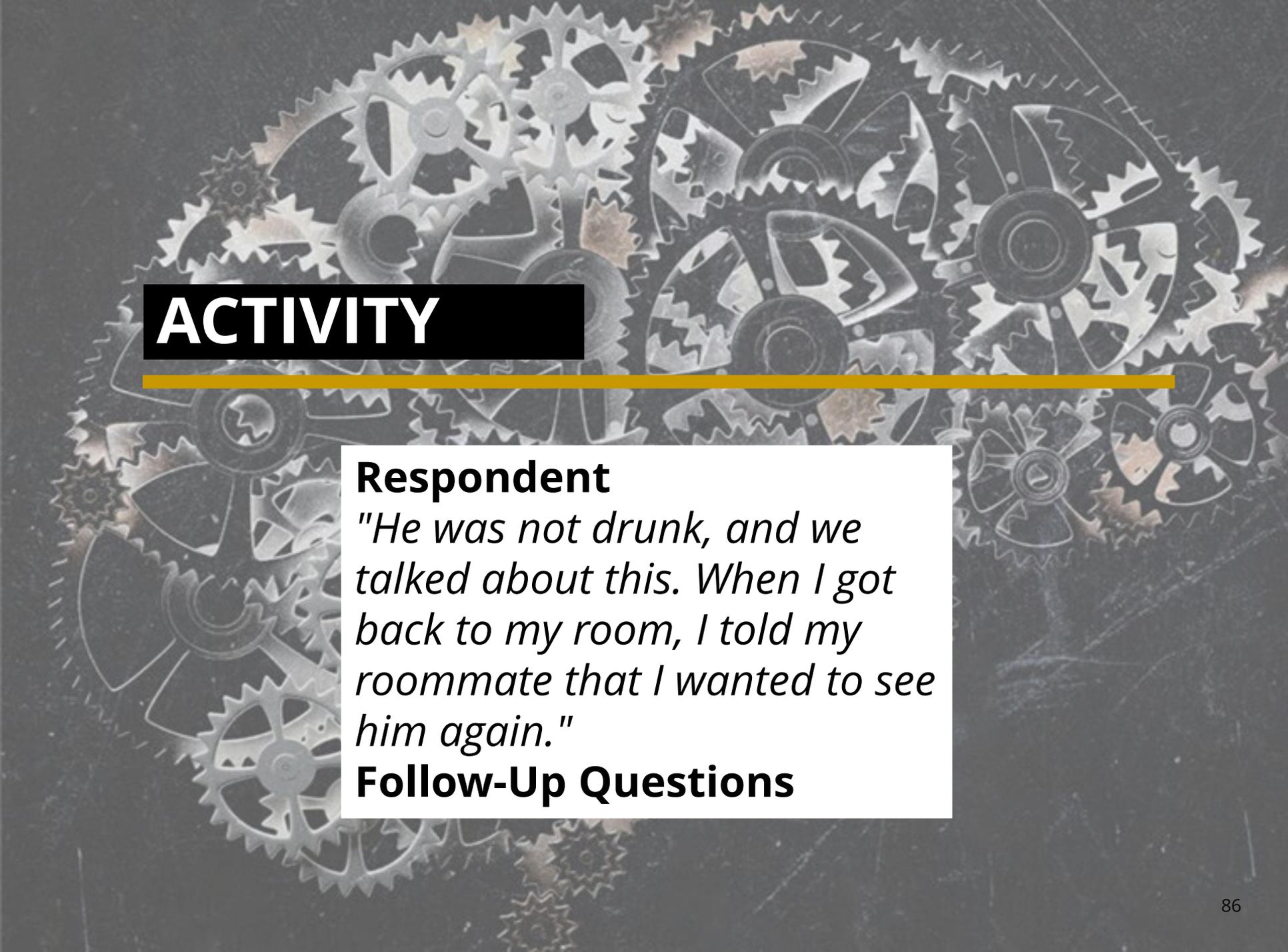
- *“What [more] would you like me to know, if anything, about what happened.”*
- What does each party believe to be the other party’s perspective on what happened.
- Re-inquire about the parties’ motivation to participate in the informal resolution process.



Fact exploration techniques (cont')

➤ Probing questions.

- Asking for additional facts if needed to evaluate case strengths/weaknesses.
- Exploring [re-exploring] feelings and thoughts...
 - *"How would you feel if we are unable to reach an agreement?"*
 - *"What is the best result for you?"*
 - *"If you couldn't achieve the best result, what will you need to feel comfortable about resolving this complaint?"*
- A guide to persuasive discussions with the other party.



ACTIVITY

Respondent

"He was not drunk, and we talked about this. When I got back to my room, I told my roommate that I wanted to see him again."

Follow-Up Questions



Subtle Persuasion techniques

- Moving the parties toward the goal.
 - Party wants to move off campus.
 - *"Do you think it will be more comfortable for you to move off campus?"*

- Suggesting possible outcome.
 - *"I'm not sure they will agree to move off-campus, but you may get them to move to another dorm and give up access to your dorm."*



The Facts

- Addressing factual strengths
- Addressing factual weaknesses
- Addressing contested facts

**When do "the facts"
become critically
important?**

CHAT



Handling Unreasonable Demands

- Won't lead to agreement.
- Won't be able to achieve demand in the next stage.
- Won't be seen as a compromise gesture.
- May be met with an unreasonable response.

QUESTIONS?

#6

Q & A with Faculty

September 30, 2021



7. The Mediation – Party Proposals & Ethical Considerations
8. Preparing the Agreement
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**Any questions about the
content from Day 1?**

CHAT

#7

The Mediation – Party Proposals & Ethical Considerations



Terms for Resolution

- Terms/outcome of the resolution are negotiable.
- May result in party-imposed corrective or punitive measures for a Respondent.
- Terms within resolution agreements may become binding according to their terms (i.e., contractual in nature).
- Outcome should be enforceable by the institution.



Party Proposals

- Hearing the proposal for resolution (i.e., terms)
 - If unreasonable or will be rejected, discuss ways to modify the proposal.
 - Be subtly evaluative.

- Communicating a resolution proposal (i.e., terms)
 - Avoid criticism of the proposal unless asked or unless you believe your opinion will not hinder further discussions.



Techniques for Keeping the Parties Talking

- Bracketing issues
- Mediator's proposal
- Time to consider
- Risks of no agreement
 - Future administrative process
 - Less control over outcome
 - Time considerations
 - Emotional considerations
 - Healing



Ethical Considerations

- Conflicts of interest
- Confidentiality
- Pressuring to reach agreement
- Subsequent disclosure of information
- Appearance of impropriety
- Disclosure of background
- Impartiality
- Mental competency of a party
- Autonomy informed consent
- Honesty
- Role boundaries
- Privileged communications

QUESTIONS?

#8

Preparing the Agreement



Preparing the Resolution Agreement

Resolution Agreements must be in writing signed by both parties (*and Title IX Coordinator*). Acknowledgements:

- The parties enter into the Resolution Agreement freely, voluntarily, and because each party believes entering into the agreement is in their best interest.
- The parties' participation in the mediation was not required, not a product of coercion, nor was it a condition of continued enrollment or employment, or enjoyment of any other right.
- The parties agree to waive right to appeal the resolution agreement (*optional*) and waive formal grievance process.



Preparing the Agreement (con't)

- The agreed-to terms of resolution.
- Consequences for breach of the agreement.
- Facilitator remained neutral, objective, and unbiased.
- Institutional record keeping responsibility.
- Confidentiality for the process and institution, unless otherwise required by law.
- Title IX Coordinator will facilitate the agreed upon outcomes.



Other Possible Terms

- Non-disclosure clause
- Non-disparagement clause



Types of Remedies

Types of remedies may include:

- Complainant or respondent relocate their housing.
- Each party is assigned to a different dining hall, workout facility, area of library.
- Complainant/Respondent withdraws from a class that the parties have together.
- Respondent writes an apology letter to Complainant acknowledging harm caused.
- Indefinite mutual no contact order



Types of Corrective or Punitive Measures

Types of corrective or punitive measures may include :

- Suspension from extra-curricular activities (athletics, student groups, Greek life, etc.)
- Restriction from campus activities (athletics events, programs, concerts, etc.)
- Enter counseling or other educational programming relating to alleged misconduct.
- Temporary withdrawal from the institution
- Permanent withdrawal from the institution

RESOURCE

Template

Resolution Agreement

QUESTIONS?



BREAK

#9

Failure to Reach Agreement



Failure to Reach Agreement

- Explain...
 - The initial inability to reach an agreement does not mean we stop trying.

- Methods of continuing dialogue
 - Date certain to resume
 - Follow-up phone conferences
 - Meeting with each party
 - Time to think
 - Time to consult others

- If efforts to resolve fail, formal complaint returns to the Grievance Process



**Failure to Reach
Agreement
*Other ideas?***

CHAT

#10

Preparing for the Mock Mediation



Fact Pattern

Strategy

**Pre-mediation
conferences
and
Mediation**

CHAT

#11

Mock Mediation Module I: Setting
the Scene & Messaging



ACTIVITY

Pre-Mediation Conferences with the Parties



BREAK



The Mediation

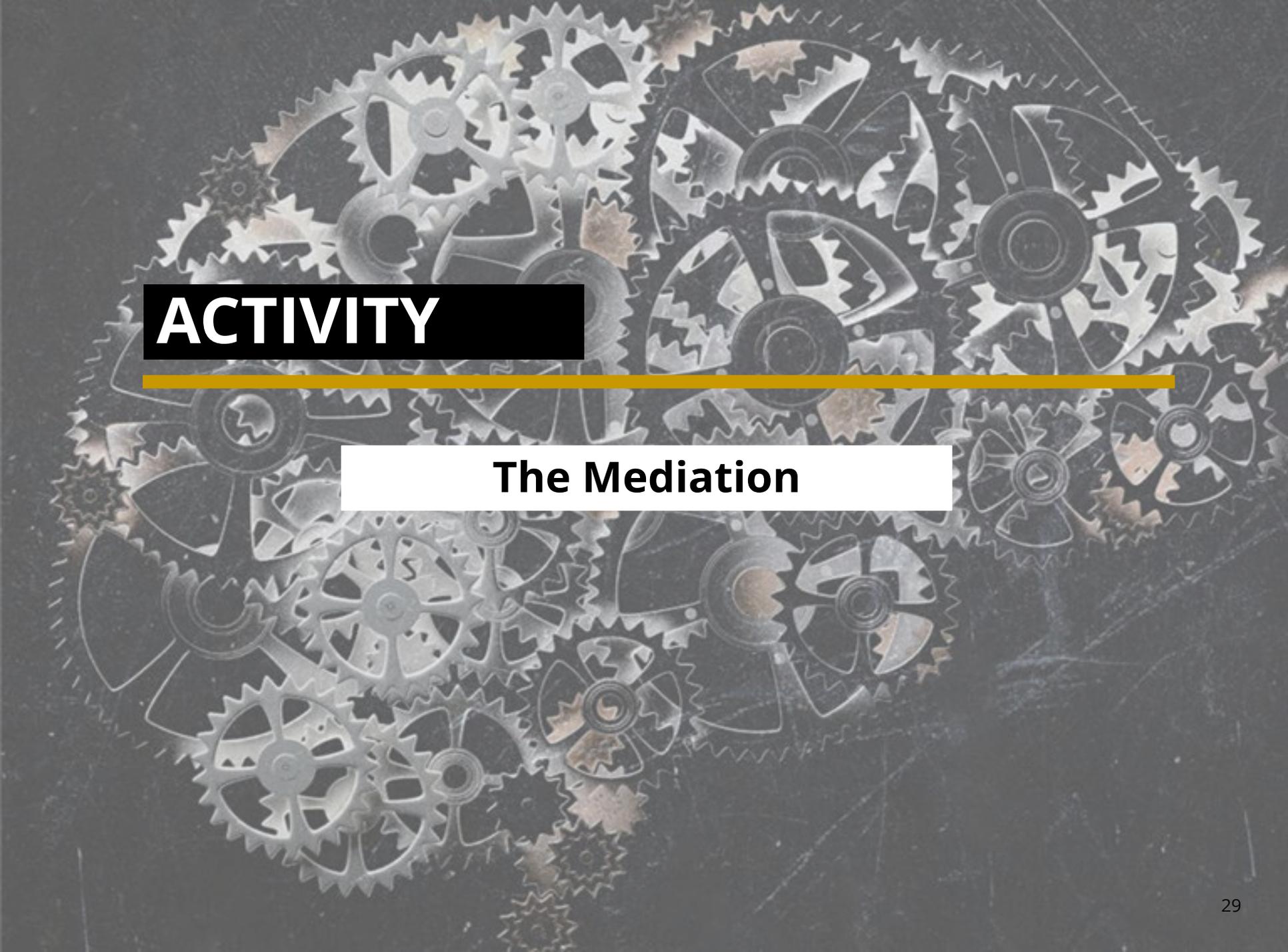
- Pre-mediation conference done.
 - Got to know each party
 - Established credibility
 - Have a good idea of the facts.
 - May suspect or know the parties' desired outcome.

- Ready to mediate.



Beginning the mediation

- Meet with one party.... Then the other
 - Re-establish connection
 - Discuss any outstanding questions from pre-mediation
 - Remind parties of the purpose of the mediation
 - Re-introduce the process and expectations for the mediation.
 - Explore the proposals



ACTIVITY

The Mediation

#12

Mock Mediation Module II: Dealing
with Party Advisors & Saving the
Mediation



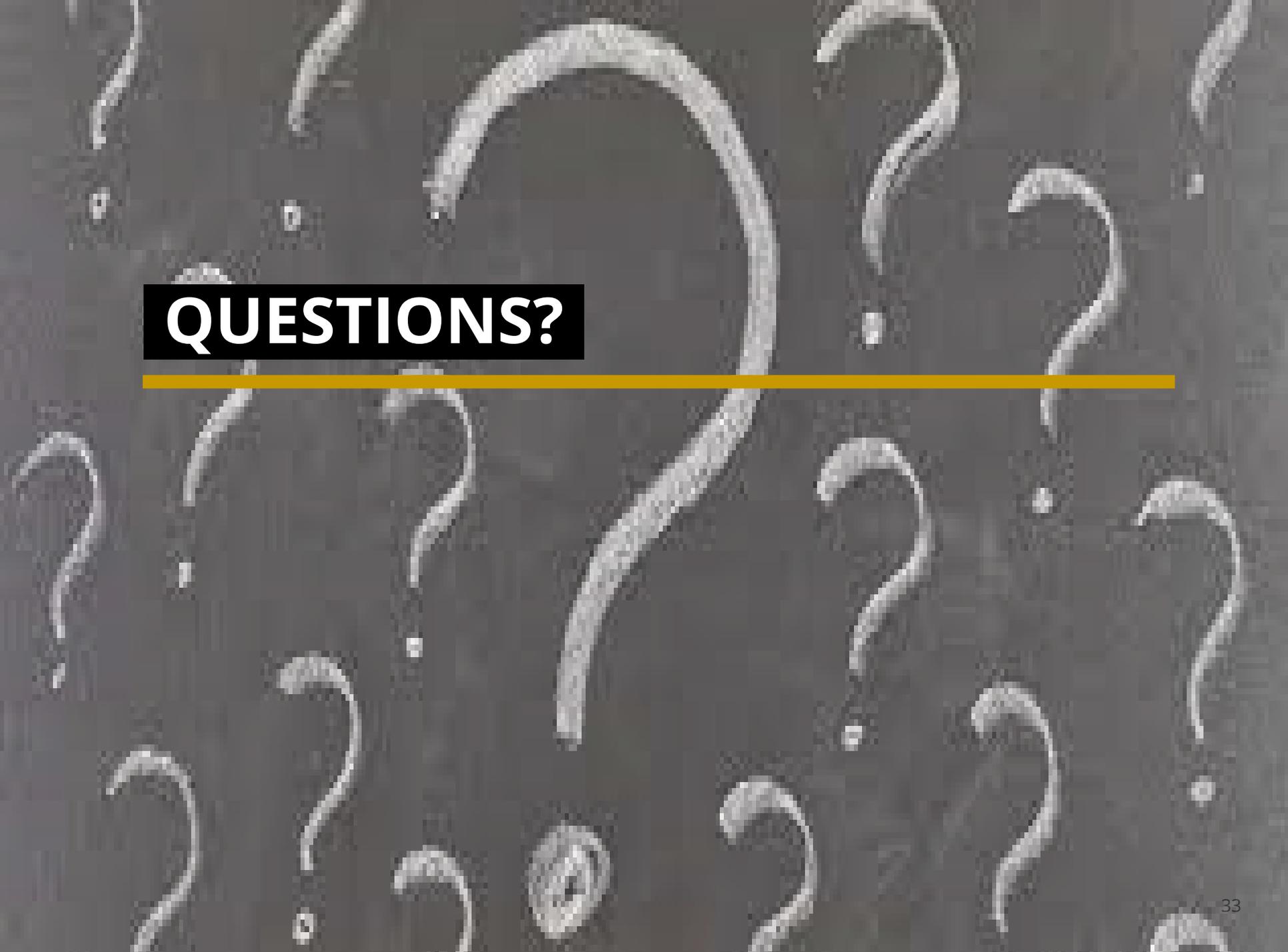
ACTIVITY

Handling Mediation Challenges

1. Party Advisors
2. Dealing with impediments to agreement

#13

Mock Mediation Debrief and
Final Q&A

The background is a dark grey color filled with numerous white question marks of varying sizes and orientations. A solid yellow horizontal line runs across the middle of the page, positioned just below the word 'QUESTIONS?'.

QUESTIONS?

*Thank
you*

