

TITLE IX

Prohibiting Discrimination on the Basis of Sex, Sexual Orientation, and Gender Identity

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Disclaimer

The goal of this presentation is to provide you with general background information on this topic. This is not intended to be a comprehensive review of this subject matter. This presentation does not constitute legal advice, and this presentation does not establish an attorney-client relationship. You should not rely on this presentation to take specific actions. The material in this presentation may quickly become outdated, so please consult with your district's legal counsel to obtain up-to-date information and legal advice relevant to your district's specific situation.

For Reference - Definitions

- **Assigned sex:** A person's status at birth as determined by genetic and anatomical characteristics (chromosomes, hormonal profiles, and internal and external sex organs) used to classify a person as male, female or intersex.
- **Gender:** The set of societal ideas about what it means to be masculine or feminine. Gender is different from assigned sex. It is socially constructed, varies from culture to culture, and changes over time.
- **Gender expression:** The way a person expresses gender, such as clothing, hairstyles, activities or mannerisms.
- **Gender identity:** A person's deeply held sense or psychological knowledge of their own gender, regardless of the sex they were assigned at birth.
- **Gender Non-Conforming:** A broad term referring to people who do not behave in a way that conforms to the traditional expectations of their gender, or whose gender expression does not fit neatly into a category.

For Reference - Definitions

- **Transgender:** This term is used as an umbrella term for individuals whose gender identity and/or expression is different from cultural expectations based on the sex they were assigned at birth. This does not imply sexual orientation.
- **Genderfluid:** This term is used by people whose gender fluctuates from day to day or over time. Their gender expression may also change and fluctuate to reflect this shifting of their gender identity.
- **Non-Binary:** An adjective describing a person who does not identify exclusively as a female or a male. They may identify as both, somewhere in between, or outside the categories of a female and a male.
- **Cis-gender:** A person who identifies with the sex they were assigned at birth.
- **Sexual Orientation:** This term describes a person's sexual or romantic attraction.
- **Sources:** *LGBTQ Definitions for Adults*, Welcoming Schools at <https://www.welcomingschools.org/resources/definitions/definitions-for-adults/>; *Transgender Terminology*, gsafe at <https://www.gsafewi.org/wp-content/uploads/Transgender-Terminology-1.pdf>

Before We Begin

- Today we Address Legal Compliance
 - What are the laws?
 - How are they implemented?
 - Who enforces them?
 - What are your obligations?
- The Bigger Issue is Understanding The Whole Child

The Law

Two Federal Laws

- Equal Protection Clause – 14th Amendment
- Title IX of the Education Amendments Act

Equal Protection Clause of the 14th Amendment to the U.S. Constitution

- *“No state shall...deny to any person within its jurisdiction the equal protection of the laws.”*
- This guarantees equal protection under the law to **all** citizens, and it applies to public schools.
- All students have a federal, constitutional right to equal protection, which means that schools have a duty to protect all students from unlawful harassment on an equal basis.

Title IX of the Education Amendments Act of 1972

- No person in the United States shall, **on the basis of sex**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Enforcing Title IX

- U.S. Department of Education (“DOE”)
- DOE’s Office for Civil Rights (“OCR”)
 - 12 offices in U.S.
 - Jurisdiction of Chicago office includes Wisconsin
- U.S. Department of Justice (“DOJ”)
- Private Individuals

The Title IX Pendulum: 2016

- OBAMA [is this all caps for a reason?] Administration
- DOE issued guidance which required institutions to “treat a student’s gender identity as the student’s sex for purposes of Title IX and its implementing regulations.”
 - <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201605-title-ix-transgender.pdf>
 - *Examples of Policies and Emerging Practices for Supporting Transgender Students*,
<https://www2.ed.gov/about/offices/list/oese/oshs/emergingpractices.pdf>
- Nationwide litigation based on 2016 guidance.

The Title IX Pendulum: 2017

- TRUMP [same question] Administration
- DOE rescinded Obama administration guidance in 2017:
 - These guidance documents take the position that the prohibitions on discrimination “on the basis of sex” in Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 et seq., and its implementing regulations, see, e.g., 34 C.F.R. § 106.33, require access to sex-segregated facilities based on gender identity. These guidance documents do not, however, contain extensive legal analysis or explain how the position is consistent with the express language of Title IX, nor did they undergo any formal public process.

The Title IX Pendulum: 2017

- In 2017, the Seventh Circuit decided an appeal from the U.S. District Court for the Eastern District of Wisconsin.
- Wisconsin sits in the Seventh Circuit
- The *Whitaker* case involved the following topics:
 - restroom use,
 - Title IX, and
 - the Equal Protection Clause
- *Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Education*, 858 F.3d 1034 (7th Cir. 2017).

The Title IX Pendulum: 2017

- Holding: **The district violated Title IX when it enforced a district policy “requir[ing] an individual to use a bathroom that does not conform with his or her gender identity”**
- The policy “punishe[d]” transgender individuals for their “gender non-conformance” and “subject[ed] Ash, as a transgender student, to different rules, sanctions, and treatment than non-transgender students...”
- To interpret the term “sex”, the *Whitaker* court relied on employment law cases discussing the prohibition on sex discrimination under Title VII.

The Title IX Pendulum: 2017

- The court rejected the district's claim that Ash had failed to make use of readily available alternatives and dismissed the district's individual privacy argument as “based upon sheer conjecture and abstraction.”

The Title IX Pendulum: 2017

- The Seventh Circuit affirmed the district court's preliminary injunction and **enjoined the school district from:**
 - **“(1) denying Ash access to the boys’ restroom;**
 - **(2) enforcing any written or unwritten policy against Ash that would prevent him from using the boys’ restroom while on school property or attending school-sponsored events;**
 - **(3) disciplining Ash for using the boys’ restroom while on school property or attending school-sponsored events; and**
 - **(4) monitoring or surveilling Ash’s restroom use in any way.”**

The school district sought review in the U.S. Supreme Court but then settled the case before a decision was reached.

The Title IX Pendulum: 2020

- June 2020, the U.S. Supreme Court decided *Bostock v. Clayton County, Georgia*, 140 S.Ct. 1731 (June 2020).
- “In Title VII, Congress adopted broad language making it illegal for an employer to rely on an employee’s sex when deciding to fire that employee. We do not hesitate to recognize today a necessary consequence of that legislative choice: **An employer who fires an individual merely for being gay or transgender defies the law.**”

The Title IX Pendulum: 2020

- Bostock provided an example of discrimination based on sexual orientation:
 - Consider, for example, an employer with two employees, both of whom are attracted to men. The two individuals are, to the employer's mind, materially identical in all respects, except that one is a man and the other a woman. If the employer fires the male employee for no reason other than the fact he is attracted to men, the employer discriminates against him for traits or actions it tolerates in his female colleague. Put differently, the employer intentionally singles out an employee to fire based in part on the employee's sex, and the affected employee's sex is a but-for cause of his discharge.

The Title IX Pendulum: 2020

- Bostock provided example of how singling out transgender individual is discrimination based on sex:
 - [T]ake an employer who fires a transgender person who was identified as a male at birth but who now identifies as a female. If the employer retains an otherwise identical employee who was identified as female at birth, the employer intentionally penalizes a person identified as male at birth for traits or actions that it tolerates in an employee identified as female at birth. Again, the individual employee's sex plays an unmistakable and impermissible role in the discharge decision.

The Title IX Pendulum: 2021

- January Executive Order:
 - Cites U.S. Supreme Court 2020 decision in *Bostock v. Clayton County, Georgia* which held that Title VII's prohibition on discrimination "because of ... sex" covers discrimination on the basis of gender identity and sexual orientation.
 - Biden administration's policy is to apply the reasoning in *Bostock* to all laws and implementing regulations that prohibit sex discrimination, including Title IX.

The Title IX Pendulum: 2021

- Biden administration takes this position:
 - Sex discrimination under Title IX prohibits discrimination on the basis of gender identity and expression and sexual orientation.

The Title IX Pendulum: 2021

- March Executive Order:
 - Directive to DOE Secretary:
 - Review all existing regulations, orders, guidance documents, policies, and any other similar agency actions (collectively, agency actions) that are or may be inconsistent with the policy.
 - Consider suspending, revising, or rescinding—or publishing for notice and comment proposed rules suspending, revising, or rescinding—those agency actions that are inconsistent with the policy.
 - Consider taking additional enforcement actions...to enforce the policy.

The Title IX Pendulum: 2021

- March Memorandum from U.S. Department of Justice's Civil Rights Division:
 - “[T]he Division has determined that the best reading of Title IX’s prohibition on discrimination ‘on the basis of sex’ is that it includes discrimination on the basis of gender identity and sexual orientation.”

The Title IX Pendulum: 2021

- April DOE Letter to Students, Educators, and other Stakeholders:
 - Outlines Department's plan to implement Executive Order.
 - OCR review of Title IX regulations focusing on sexual harassment. In addition, focus “on ensuring, through the steps set out below, that students who have experienced discrimination based on sexual orientation or gender identity have their legal rights fully met.”
 - *Public hearing*
 - *Forthcoming Q&A on Title IX regulations*
 - *Notice of Proposed Rulemaking*

The Title IX Pendulum: 2021

- Predictions by the National School Board Association:
 - We anticipate major changes in policy, regulation, guidance, and enforcement related to discrimination on the basis of sexual orientation or transgender status.
 - The Order is likely to result in the rescission of the previous administration's rules, regulations, and guidance stating that Title IX does not specifically prohibit discrimination in education programs based on sexual orientation or gender identity.
 - It may prompt regulations and guidance that expressly require schools to allow students to use bathrooms and locker rooms that are consistent with their gender identity, and to play on athletic teams that are consistent with their gender identity.
 - We expect that the Department of Education will change its enforcement position regarding school policies that do not permit transgender students to use the bathrooms and locker rooms consistent with their gender identity.
 - We also expect that, in an attempt to address overlapping discrimination, more agencies will examine sexual harassment complaints alleging discrimination based upon gender identity and sexual orientation to see whether the violation overlaps into some other area of discrimination.

The Title IX Pendulum: 2021

- June 16: U.S. Department of Education (DOE) issued a Notice of Interpretation (Notice) explaining that it will enforce Title IX's prohibition on discrimination on the basis of sex to include: (1) discrimination based on sexual orientation; and (2) discrimination based on gender identity.

The Title IX Pendulum: 2021

- This Notice reaffirms that DOE's Office for Civil Rights (OCR) will again investigate complaints of discrimination based on sexual orientation and gender identity and will address compliance concerns or violations when necessary, a practice that was halted during the past administration.

The Title IX Pendulum: 2021

- OCR stated that it will investigate "allegations of individuals being harassed, disciplined in a discriminatory manner, excluded from, denied equal access to, or subjected to sex stereotyping in academic or extracurricular opportunities and other education programs or activities, denied benefits of such programs or activities or otherwise treated differently because of their sexual orientation or gender identity."

The Title IX Pendulum: 2021

- June 28: U.S. Supreme Court declined to hear *Grimm v. Gloucester* (4th Cir. 2020). Court of appeals' decision stands.
- Fourth Circuit Court of Appeals decided that restroom policies segregating transgender students and denying transgender students accurate transcripts are unconstitutional and violate Title IX.
- The District argued that it had the ability to create sex-segregated restrooms and that the act in and of itself isn't discriminatory.
- The court didn't find the argument persuasive noting that **while the act of creating the sex-segregated restrooms may not have been discriminatory – the school board's notion of what "sex" means was discriminatory.**

Other Federal Courts

- The U.S. Courts of Appeals for the 3rd, 4th, 6th, 7th, and 11th Circuits **have held that under Title IX, transgender students can use sex-segregated facilities at schools based on gender identity.** Courts issuing these rulings have explained that bathroom policies requiring transgender students to use a restroom corresponding to their biological sex, or a separate restroom apart from other students, discriminate against them based on sex.
- *Source Protections for LGBTQ Employees and Students after Bostock v. Clayton County (2020) at : [nsba-protections-for-lgbtq-employees-and-students-guide-2020.pdf](https://www.nsba.org/advocacy/2020/06/15/nsba-protections-for-lgbtq-employees-and-students-guide-2020.pdf)*

State Law

- Wisconsin Statute s. 118.13
- Wisconsin Administrative Code PI 9
- Local ordinances

Wisconsin Statute 118.13

Wisconsin Administrative Code PI 9

- Wisconsin pupil nondiscrimination law, which states that no individual may be denied admission to any public school or be denied participation in, be denied the benefits of or be discriminated against in any curricular, extracurricular, pupil services, recreational or other program or activity because of the individual's:
 - **Sex**
 - Race
 - Religion
 - Ancestry
 - Creed
 - Pregnancy
 - Parental Status
 - Marital Status
 - Physical Disability
 - Mental Disability
 - Emotional Disability
 - Sexual Orientation

Proposed Legislation

- 2021 AB 196/ 2021 SB 322
- Creates exception to nondiscrimination statute 118.13 for transgender female athletes
- Defines “sex” as sex assigned to an individual at birth
- Requires school districts to designate sports teams as female, male, and co-ed
- Prohibits individuals whose sex assigned at birth is male from participating in female sports
- Creates a private cause of action

Wisconsin Statute 118.13

Wisconsin Administrative Code PI 9

- State law does not specifically provide protections for transgender and gender nonconforming students.
- Many school districts in Wisconsin have added gender identity/expression to their local non-discrimination policies.
- Others have not added the terms but cover such items underneath a local interpretation of sex.
- *See also: DPI Safe Schools for Lesbian, Gay, Bisexual, and Transgender Students at: <https://dpi.wi.gov/sspw/safe-schools/lgbt>*

Local Regulations

- Several cities and counties in Wisconsin prohibit discrimination based on gender identity in the workplace and in other programs and activities.
- Some of these include: the cities of Appleton, Madison, Milwaukee, Racine, Janesville, Stevens Point, Cudahy, and the counties of Dane and Milwaukee.

Supporting Students Legal Compliance Issues

Basic Tenets

- Respect individuals
- Take steps to prepare
 - Identify issues
 - Be ready to address parents/students
 - Plan for different scenarios
- Each student has different needs
 - Meet with students and family, if supportive

Student Confidentiality

- A student's transgender status, legal name or sex assigned at birth is confidential information and protected personally identifiable information, and disclosure of that information may violate the school's obligations under the Family Educational Rights and Privacy Act (FERPA) or constitutional privacy protections.
- Disclosure could also expose a student to harassment and abuse from peers, educators and school staff.
- Absent an explicit legal obligation or express permission from the student and family, such information should not be shared with anyone, including other parents and school personnel, and the school and district should implement safeguards to prevent such disclosures.
- *Source: Schools in Transition, A Guide for Supporting Transgender Students in K-12 Schools at <https://www.hrc.org/resources/schools-in-transition-a-guide-for-supporting-transgender-students-in-k-12-s>*

Protecting the Student's Privacy

- Talk to the Student.
 - What information should be shared?
 - How will it be shared?
 - With whom and when will this information be shared?
 - Parents?
 - Teachers? Coaches? Other parents?
 - With peers in the transitioning student's class only?
 - With peers in the student's grade level?
 - With some/all students at school?
 - Once the information is shared, what are parameters or expectations for approaching the student?

Names/Pronouns/Records

- “A person’s name and pronouns are an important part of that individual’s identity. In many ways, they define how someone is perceived and affect how they interact with others. In our everyday lives, we consistently make an effort to use a person’s chosen name and pronoun without even asking whether that is the person’s legal name or gender, let alone requiring proof. It is important to extend those same social courtesies to a transgender student.”
- Student management systems often include a field for preferred name/nickname, preferred pronouns.
- Consider that preferred names and pronouns for a student may be different in class/school than communications with parents.

Names/Pronouns/Records

- Section 786.36, Wis. Stat., provides a method for any citizen—including minors—to petition the circuit court of the county where he/she resides to have his/her name changed. Children younger than 14 may not file a petition on their own behalf.
- Though a statutory name change has the advantage of providing an official record, the general rule of common law in Wisconsin is that all persons, including minors, can adopt whatever name they please.

Names/Pronouns/Records

- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 C.F.R. §§ 99.00 et seq.) is a federal law that protects the privacy of student educational records.
- FERPA gives parents certain rights with respect to their minor children's educational records (transfers to students at 18).
- Under FERPA, students, current or former, have a right to seek to amend their school records if said records are "inaccurate, misleading, or in violation of the student's rights of privacy." (34 C.F.R. § 99.7(a)(2)(ii)).

Names/Pronouns/Records

- The attorney general advises school administrators generally to honor requests from students who have obtained new names (whether pursuant to statute or common law) to make corresponding changes in school records. Nevertheless, because student name changes create administrative burdens and may involve disagreements between parents (or between a student and his/her parents) over a child's name, boards may find it useful to provide guidance for handling name-change requests in district policies or procedures.
- For example, a name change may be recognized through a system that permits records to be located under either the student's original name or his/her new name.

Pronouns

Source: gsafe at: <https://www.gsafewi.org/wp-content/uploads/Pronouns-are-Important.pdf>

A (Short) List of Pronouns

SUBJECT PRONOUN	OBJECT PRONOUN	POSSESSIVE PRONOUNS	REFLEXIVE PRONOUN
_____ is an activist.	I am proud of _____.	That is _____ book. That book is _____.	That person likes _____.
she	her	her/hers	herself
he	him	his	himself
ze*	hir	hir/hirs	hirsself
ze*	zir	zir/zirs	zirsself
e or ey	em	eir/eirs	eirself or emself
per	per	per/pers	Perself
hu	hum	hus/hus	Humself
they**	them	their/theirs	Themselves
vey	vem	veir/veirs	veirself
fae	faer	faer/faers	faerself

Restrooms/Locker Rooms

- *Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Education*, 858 F.3d 1034 (7th Cir. 2017):
- : “The district violated Title IX when it enforced a district policy “requir[ing] an individual to use a bathroom that does not conform with his or her gender identity”
- Court stated that offering gender neutral bathroom isn’t enough.
- Other courts have considered locker rooms much like bathrooms. E.g., *N.H. v. Anoka-Hennepin Sch. Dist. No. 11*, 950 N.W.2d 553 (Minn. Ct. App. 2020)

Restrooms/Locker Rooms

- Consider offering private restrooms and changing areas for any student.
- “A transgender student’s presence in the restroom provides no more of a risk to other students’ privacy rights than the presence of an overly curious student of the same biological sex who decides to sneak glances at his or her classmates performing their bodily functions. Or for that matter, any other student who uses the bathroom at the same time.” *Whitaker* at 29-30.

Overnight Trips

- There is no definitive federal legal authority on the question of room assignments for transgender students.
- Start here: Title IX's prohibition on sex discrimination extends to transgender students.
- Consider: student's comfort level, peers that the student may be comfortable having as a roommate.
- Obama 2016 Guidance:
 - **Housing and Overnight Accommodations.** Title IX allows a school to provide separate housing on the basis of sex. But a school must allow transgender students to access housing consistent with their gender identity and may not require transgender students to stay in single-occupancy accommodations or to disclose personal information when not required of other students. Nothing in Title IX prohibits a school from honoring a student's voluntary request for single occupancy accommodations if it so chooses.

Dress Codes

- In general, courts grant school districts a great degree of latitude in adopting and enforcing dress codes that are based on promoting a safe and educationally focused environment at school. But a transgender student could challenge a dress code that contains gender specific provisions on several legal grounds:
 - 1) violation of free expression rights under the First Amendment or violation of due process and equal protection rights under the Fourteenth Amendment;
 - 2) violation of Title IX's prohibition on discrimination based on gender; and
 - 3) violation of state civil rights laws and constitutional protections.

Gender-specific dress codes are likely to be deemed constitutional only where the school can show that the restricted expression substantially disrupts or interferes with the work of the school or the rights of other students.

- *Source: Transgender Students in School NSBA Updated October 2017*

Parent-Student Relationship

- Determine level of parent support.
- Can you facilitate the communications?
- Are you concerned about the student's safety?

John and Jane Doe 1, et al. v. Madison Metropolitan School District

- MMSD Guidance and Policies adopted in April 2018:
- The District shall ensure that all personally identifiable and medical information relating to transgender, non-binary and gender expansive students shall be kept confidential in accordance with applicable state, local and federal privacy laws. School staff shall not disclose any information to that may reveal a student's gender identity to others, including parents or guardians and other school staff, unless legally required to do so or unless the student has authorized such disclosure.
- Transgender, non-binary and gender-expansive students have the right to discuss and express their gender identity and expression openly and to decide when, with whom and how much to share with private information. If a student chooses to use a different name, to transition at school, or to disclose their gender identity to staff or other students, this does not authorize school staff to disclose a student's personally identifiable or medical information.
- All staff correspondence and communication to families in regard to students shall reflect the name and gender documented on Infinite Campus unless the student has specifically given permission to do otherwise. (This might involve using the student's affirmed name and pronouns in the school setting and their legal name and pronouns with family).
- Students will be called by their affirmed name and pronouns regardless of parent/guardian permission to change their name and gender in MMSD systems.

John and Jane Doe 1, et al. v. Madison Metropolitan School District

- In February 2020, the Wisconsin Institute of Law & Liberty (WILL) filed suit in Dane County Circuit Court against MMUSD, on behalf of a group of fourteen (14) parents, who argued that it violated their right to make decisions about healthcare and religion.

John and Jane Doe 1, et al. v. Madison Metropolitan School District

- September 2020, circuit court entered injunction:
 - Defendant Madison Metropolitan School District is hereby enjoined, pending Plaintiff's appeal, from applying or enforcing any policy, guideline or practice reflected or recommended in its document entitled "Guidance & Policies to Support Transgender, Non-Binary & Gender-Expansive Students" **in any manner that allows or requires District staff to conceal information or to answer untruthfully in response to any question that parents ask about their child at school, including information about the name and pronouns being used to address their children at school. This injunction does not create an affirmative obligation to disclose information if that obligation does not already exist at law and shall not require or allow District staff to disclose any information that they are otherwise prohibited from disclosing to parents by any state or federal law or regulation.**

Athletic Participation

- WIAA Transgender Participation Policy:
 - The WIAA policy permits transgender students who meet certain criteria to participate in athletics. Schools must determine whether a transgender student may play on girls or boys teams based on documentation of certain items.
 - <https://www.wiaawi.org/Portals/0/PDF/Eligibility/WIAAtransgenderpolicy.pdf>

WIAA Criteria

- A written statement from the student affirming the consistent gender identity and expression to which the student self-relates.
- Documentation from individuals such as, but not limited to, parents, friends, and/or teachers, which affirm the actions, attitudes, dress and manner and demonstrate the student's consistent gender identification and expression.
- Written verification from an appropriate health-care professional (physician, psychologist) of the student's consistent gender identification and expression.
- Medical documentation (hormonal therapy, sexual re-assignment surgery, counseling, etc.).

Homecoming, Prom & Other Traditions

- Many school traditions have involved sex-segregated activities.
- Many schools have eliminated “king” and “queen” and instead choose prom and homecoming court unrelated to gender.

Bullying/Harassment

- Discrimination on the basis of a student's gender identity or gender non-conforming status is unlawful and constitutes discrimination.
- Some school district policies prohibit discrimination on the basis of "sex."
- Some policies specifically prohibit discrimination on the basis of transgender status/ gender identity.

Let's Review



Review

- Title IX prohibits discrimination on the basis of “sex.”
- The Department of Justice and Department of Education interpret sex to include gender identity and gender non-conforming status.
- The Seventh Circuit and four other federal court of appeals have held that a school district cannot discriminate on the basis of gender identity under Title IX.

Initial Considerations

- Start with the law.
- Recognize students are different; there is no one size fits all template.
- Consider through the lens of “What are the student’s needs?”
- Consider the student’s age, level of parent involvement, and peer and community support.
- Be able to provide resources to student/parents.

Specific Considerations

- Be able to discuss and plan. The following should drive the discussion:
 - The student's needs - immediately and long term
 - District policies and procedures
 - The age of student and parents' involvement and support
 - Whether the student has peer support
 - How to maintain student confidentiality
 - How to make the district's facilities accessible for the student
 - Possible harassment/retaliation

Be Prepared to Respond

- Why is the school making a big deal of this for one or two students?
- What about my child's needs?
- What about my family's beliefs about this topic?
- How will you prevent a male student/adult from pretending to be transgender and going into the girls locker room?
- You see a student assigned the sex of male at birth entering a female restroom?
- My second grader is too young to hear about this.
- Isn't this a discussion that should take place in later grades with sexuality and reproduction?
- I forbid you to call my student by anything other than his/her assigned name at birth.
- I don't want my child using the male/female restroom or locker room.
- I don't want my child dating/around LGBTQ(IA+) students.

Questions?