

#MeToo on Campus

James A. Keller, Esq.
Saul Ewing Arnstein & Lehr, LLP

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#MeToo on Campus

I. The #MeToo Movement

The #MeToo hashtag was originally created by Tarana Burke in an effort to aid underprivileged women of color affected by sexual abuse.¹ The movement really exploded, however, once activist/actress Alyssa Milano became involved. In the wake of prosecutors determining they had sufficient evidence to charge Bill Cosby criminally for past sexual misconduct, as well as the publication by the New York Times and New Yorker Magazine of credible sexual harassment/sexual assault allegations against the powerful producer Harvey Weinstein in 2017, Milano encouraged those who had been sexually assaulted or harassed to use the #MeToo hashtag to demonstrate the prevalence of sexual assault and sexual harassment. More than 500,000 people on Twitter and twelve million people on Facebook used the hashtag in just the first twenty-four hours after Milano's original tweet.²

As a national conversation about sexual assault and sexual harassment began, other women, and some men, came forward to say "#MeToo." According to a New York Times article on October 29th, 2018, at least 201 "powerful men" have lost their jobs/positions in the wake of the #MeToo movement.³ These included Chairman and CEO of Fox News and Fox Television Stations Roger Ailes, Conservative Political Commentator Bill O'Reilly, U.S. Democratic Senator from Minnesota Al Franken, American Television Journalist and Talk Show Host Charlie Rose and American Television News Anchor Matt Lauer.⁴ Most recently, of course, the nation was transfixed by historic sexual abuse allegations made against Supreme Court Nominee (now Justice) Brett Kavanaugh by Christine Blasey-Ford and others.

¹ Najja Parker, "Meet the woman who started the Me Too movement a decade ago", Atlanta Journal Constitution, December 6, 2017.

² Id.; Vin Gurrieri, "#MeToo's 'Post-Harvey' Energy Not Going Away: EEOC Chair," Law360, Oct. 5, 2018, <https://www.law360.com/articles/1089908>.

³ Audrey Carlsen, Maya Salam, Claire Cain Miller, Denise Lu, Ash Nju, Jugal K. Patel, and Zach Wichter, "#MeToo Brought Down 201 Powerful Men. Nearly Half of Their Replacements are Women," The New York Times, October 29, 2018, <https://www.nytimes.com/interactive/2018/10/23/us/metoo-replacements.html>.

⁴ Id.

The public nature of the #MeToo discussion appears to have reactivated trauma for some sexual assault survivors. For example, RAINN (Rape, Abuse & Incest National Network) reported a 338% increase in traffic on their hotline from Thursday, September 28, 2018 (the date of Dr. Blasey-Ford's public testimony regarding the alleged assault) through the following Sunday. Moreover, according to the Chair of the Equal Employment Opportunity Commission (EEOC), there were 12% more claims of sexual harassment in the fiscal year that ended September 30, 2018 than there were in the prior year.⁵ This is the first time this decade that the EEOC has seen any increase at all in such charges.⁶ Employers in general are requesting additional training for employees at all levels on sexual harassment.⁷

II. #MeToo in Education

Schools, both K-12 and institutions of higher education, have been swept in to the #MeToo movement. Cases that had not been reported in the past are coming to light as much as 50 years later.⁸ Cases that had been investigated, but closed, are being reopened for further consideration.⁹

⁵ Vin Gurrieri, FN2, Id.

⁶ Id.

⁷ Id.

⁸ Collin Binkley, “#MeToo Inspires Wave of Old Misconduct Reports to Colleges,” WALB News 10, Oct. 13, 2018, <http://www.walb.com/2018/10/13/metoo-inspires-wave-old-misconduct-reports-colleges/>; see also Justine McDaniel, “‘No Boundaries’ for Teachers Enabled Decades of Sex Abuse at Elite Bucks School, Report Finds”, Philadelphia Inquirer, February 1, 2017, <http://www2.philly.com/philly/news/Grand-jury-Sex-abuse-spans-decades-at-Solebury-School.html> (noting that some allegations from as far back as the 1950s had just been brought to light).

⁹ See, e.g., <https://thetab.com/us/pitt/2018/01/22/we-spoke-to-carol-stabile-about-the-reopened-title-ix-investigation-of-the-communication-department-7581>

And these cases are front page news. In fact, as part of a local television station (WXIA Atlanta)'s reporting on sexual misconduct in the K-12 system, they reported the following list highlighting Title IX complaints and their categorization made in Atlanta-area school districts:¹⁰

District	Student Pop.	# of Schls.	# of Total disciplined Offenses in 2016-2017 School Year	Sexual Offens.	Sexual Harassm.	Sexual Bttry.	Bully.
Gwinn. County	173,246	133	1271	1041	230	1	1
Cobb County	111,751	112	333	240	93	0	114
Dekalb County	101,103	134	322	229	93	0	688
Fulton County	95,460	104	286	121	144	21	279
Clayton County	53367	62	181	57	105	19	222
Jefferson City	3,249	4	11	3	8	0	19

With rising awareness brought on by educational efforts, the #MeToo movement, and the national conversation sparked by the Kavanaugh hearings, we can expect that the number of “historic” incidents of sexual misconduct on campus will only increase in the coming years.¹¹ Indeed, national non-profit organization Stop

¹⁰ Becky Kellog, “Sexual assaults and harassment in your local schools,” Feb. 27, 2018, <https://www.11alive.com/article/news/local/sexual-assaults-and-in-your-local-schools/85-523715258>

¹¹ Matt Fossen, “Feds slow and struggling to keep up with growing list of college sexual assault investigations,” December 20, 2015, <https://www.foxnews.com/politics/feds-slow-and-struggling-to-keep-up-with-growing-list-of-college-sexual-assault-investigations>. (“Public

Sexual Assault in Schools (SSAIS.org) is encouraging victims of sexual harassment and assault in the K-12 world to share their experiences using the hashtag #metook12. . . .

The #MeToo movement is, among other things, bringing to light a variety of behaviors that for decades some considered to be indelibly ingrained in academe, particularly in higher education.¹² For example, there has always been an inherent power differential between faculty and students, which can be exploited by the person holding power (the faculty member) for romantic pursuits. Secluded labs and remote research sites allowed, in some circles, for quiet and “off the grid” harassment.¹³

Even at some private K-12 boarding schools, where teachers might only be a few years older than students, some would argue that in the 1960s and 1970s it was “accepted” that teacher-student relationships would happen from time to time. The #MeToo movement has given confidence that these situations are not ok, are not acceptable, and even if they happened years ago, should be reported.¹⁴

III. Civil Liability And #MeToo Allegations

A. Title IX

Title IX is the dominant legal vehicle for someone making a “#MeToo” allegation against a school, college or university. In a typical Title IX case, a former student alleges that a teacher/administrator/coach’s sexual harassment or assault of him/her constituted sex-based discrimination under Title IX.¹⁵ To adequately plead a Title IX claim in a #MeToo context, a plaintiff must allege the following:

awareness is certainly one factor affecting the increase in the number of OCR sexual violence cases. Due to the news coverage on sexual violence issues . . . it’s possible that students and other members of the public became better informed about resources available to them, which, in turn, may have contributed to the substantial increase in the number of complaints involving sexual violence.”)

¹² Katherine Mangan, “Here’s What Sexual Harassment Looks Like in Higher Education,” November 16, 2017, <https://www.chronicle.com/article/Here-s-What-Sexual/241807>.

¹³ Id.

¹⁴ Katherine Mangan, “Will Fury Over Harvey Weinstein Allegations Change Academe’s Handling of Harassment?” Oct. 13, 2017, <https://www.chronicle.com/article/Will-Fury-Over-Harvey/241453>.

¹⁵ Franklin v. Gwinnett Ct. Pub. Sch., 503 U.S. 60, 75, 112 S. Ct. 1028, 1039 (1992).

- An “appropriate person” at the school had “actual notice” of the misconduct.
- The “appropriate person” and/or other school administrators with knowledge were deliberately indifferent to the misconduct.
- The student was harmed as a result of that deliberate indifference.¹⁶

An “appropriate person”, as defined in the 11th Circuit, is an “official of the school ... who at a minimum has authority to institute corrective measures on the [school’s] behalf.”¹⁷ Whether someone is an “appropriate person” is typically a fact-based inquiry. “Deliberate indifference”, in turn, means that school administrators with knowledge responded in a way that was “clearly unreasonable in light of the known circumstances.”¹⁸ The bar to prove deliberate indifference is a high one, and even someone who can plead actual, historic allegations of sexual assault may have trouble at the pleading stage asserting that an institution was deliberately indifferent.¹⁹

A related, and frequent, challenge that plaintiffs face in a “historic” #MeToo Title IX case is the statute of limitations. Title IX has no statute of limitations, but instead borrows from the forum state’s personal injury statute of limitations. In Georgia, that typically means a two-year statute of limitations.²⁰ However, for allegations of childhood sexual abuse, a plaintiff has until age 23 to file, regardless of when the abuse occurred.²¹ There have been extensive efforts over the past 18 months or so to further extend that statute of limitations of Georgia -- and from July 1, 2015 to July 2, 2017 there was a window of time for individuals to file historic claims of sexual abuse under the now-repealed “Hidden Predator Act”.²² Right now, however, someone claiming

¹⁶ See, e.g., Saphir v. Broward County Pub. Schs., --- Fed. Appx. ---, 2018 WL 3641719 (11th Cir. July 31, 2018).

¹⁷ Id. at *2.

¹⁸ Id. at *3.

¹⁹ See, e.g., Raihan v. George Washington University, 324 F. Supp. 3d 102, 104 (D.C. 2018) (even though Plaintiff asserted compelling facts of historic assault, she failed to adequately plead how any deliberate indifference *by the university* caused that assault).

²⁰ Georgia Code § 9-3-33.

²¹ Georgia Code § 9-3-33.1

²² See, e.g., Ty Tagami, “Georgia Denies Older Survivors of Child Sexual Abuse a Chance to Sue”, The Atlanta Journal-Constitution, March 30, 2018, <https://www.myajc.com/news/state-->

childhood sexual abuse has until age 23 to file their claim, and anyone else has two years to do so.

While these cases can be challenging to plead and prove, and the statute of limitations hurdle is a real one, it does not mean that the case will not be filed – entailing cost, time, and the high likelihood of frequent and unflattering news stories.²³

B. Other Claims²⁴

Other legal claims that are often asserted for #MeToo historic sexual abuse – subject to the same statute of limitations challenges, depending on how long ago the conduct occurred, include:

- Equal Protection violation under Section 1983.²⁵
- Negligence, negligent security, negligent supervision.²⁶
- Negligent hiring, retention, or supervision.²⁷
- Assault and battery/vicarious liability for same.²⁸

[regional-govt--politics/georgia-denies-older-survivors-child-sexual-abuse-chance-sue/UQLEk7OoU985Atu2h6BOwI/](https://www.myajc.com/news/state--regional/former-students-now-allege-sex-abuse-georgia-boarding-school/OmNNVnAoQwM6aaKc8bZDdO/).

²³ See, e.g., Alan Judd, “17 Former Students Now Allege Sexual Abuse”, The Atlanta Journal-Constitution, June 7, 2018, at <https://www.myajc.com/news/state--regional/former-students-now-allege-sex-abuse-georgia-boarding-school/OmNNVnAoQwM6aaKc8bZDdO/>

²⁴ It is always possible, of course, that individual perpetrators could be subject to criminal charges, depending on when claims are brought forward. This white paper focuses on non-criminal risk.

²⁵ Hill v. Cundiff, 797 F.3d 948 (11th Cir. 2015) (asserted, but dismissed).

²⁶ Ross v. Corporation of Mercer University, 506 F. Supp. 2d 1325 (M.D. Ga. 2007) (asserted, not reached by Court as federal claims dismissed and court declined to exercise pendent jurisdiction).

²⁷ Saphir, 2018 WL 3641719 at * 5.

²⁸ Davis v. DeKalb County Sch. Dist., 996 F. Supp. 1498 (N.D. Ga. 1998).

- Intentional infliction of emotional distress.²⁹
- Breach of contract – particularly at college and university level. “We were promised a safe environment, and did not get it.”³⁰
- Fraud – same theory as breach of contract, but we were *induced* to come to this school with promise of a safe environment, and did not get it.³¹
- Fair Business Practices Act³² (misrepresentations in goods and services used for personal purposes) – have not seen this asserted yet in Georgia, but we have seen this asserted in Title IX cases elsewhere.³³

C. What About Sovereign Immunity?

While school districts are protected by sovereign immunity, school principals, teachers, aides, bus drivers and others employed by a school district are entitled to official immunity.³⁴ Under official immunity, if a person employed by a public school district negligently performs or fails to perform a *ministerial* act or function, then he or she may be liable for the injury or damage that resulted. If, however that person negligently performs or fails to perform a *discretionary* act or function, so long as that person does not act with “actual malice” or with “actual intent to cause injury,” that person will not be liable for the injury or damage that resulted. A “ministerial act” is “commonly one that is simple, absolute, and definite, arising under conditions admitted or proved to exist and requiring merely the execution of a specific duty.”³⁵ A “discretionary act” requires “the exercise of personal deliberation and judgment, which in turn entails examining the facts, reaching reasoned conclusions, and acting on them

²⁹ Id.

³⁰ Doe 1 v. Baylor Univ., 240 F. Supp. 3d 646, 666 (W.D. Tex. 2017).

³¹ Twersky v. Yeshiva Univ., 993 F. Supp. 2d 429 (S.D.N.Y. 2014).

³² Georgia Code §10-1-390 et seq.

³³ See, e.g., Doe v. Trustees of the University of Pennsylvania, 270 F. Supp. 3d 799 (E.D. Pa. 2017); see Twersky, *supra*, at 442.

³⁴ See, e.g., Smith v. McDowell, 292 Ga. App. 731, 733 (Ga Ct App 2008) (“Absent malice or intent to injure . . . , public school officials and employees may be held personally liable only for the negligent performance of ministerial acts.”).

³⁵ Murphy v. Bejjani, 282 Ga. 197, 199 (2007).

in a way not specifically directed.”³⁶ In order to be found to be “actual malice” the official must have acted with “the intent to cause the harm suffered” by the student-plaintiff.³⁷

The reason given for official immunity is generally that articulated in the Restatement (Second) of Torts:

The basis of the immunity has been not so much a desire to protect an erring officer as it has been a recognition of the need of preserving independence of action without deterrence or intimidation by the fear of personal liability and vexatious suits. This, together with the manifest unfairness of placing any person in a position in which he is required to exercise his judgment and at the same time is held responsible according to the judgment of others, who may have no experience in the area and may be much less qualified than he to pass judgment in a discerning fashion or who may now be acting largely on the basis of hindsight, has led to a general rule that tort liability should not be imposed for conduct of a type for which the imposition of liability would substantially impair the effective performance of a discretionary function.³⁸

Georgia courts have concluded that when school officials are monitoring, supervising or controlling students, they are performing “discretionary functions,” “even where specific school policies designed to help control and monitor students have been violated.”³⁹

³⁶ Id.

³⁷ Id. at 203.

³⁸ Gilbert v. Richardson, 264 Ga. 744, 750 (1994) (quoting Restatement (Second) of Torts § 895D comment b).

³⁹ Leake v. Murphy, 274 Ga. App. 219, 225 (Ga Ct App 2005) (overruled in limited part on other grounds by Murphy v. Bajjani, 282 Ga. 197, 299 (2007)).

IV. Other Legal Risks to Your Campus For #MeToo Allegations

A. OCR Investigation

Beyond civil litigation, the other predominant legal risk for a #MeToo allegation is that it sparks an investigation from the Office for Civil Rights at the United States Department of Education (“OCR”). As of September 28, 2018, there were forty-two outstanding OCR complaints against K-12 schools in Georgia.⁴⁰ See Appendix I for a list of schools including the type of complaint filed and the date of the complaint.

When OCR conducts an investigation, it typically resolves that investigation with either a resolution agreement or a determination of insufficient evidence. OCR can, however, make determinative findings that an institution allowed a sexually hostile environment in violation of Title IX and, theoretically, is empowered to cut off or reduce federal funding to a school/school district for Title IX violations.⁴¹ While such financial sanctions are very rare and terminating funding really never happens for any non-profit school, the time, risk, and public exposure of a Title IX investigation by OCR can be substantial.

B. Mandated Reporting Obligations

If a #MeToo allegation involves a child and sexual abuse⁴² or sexual exploitation⁴³, Georgia’s Mandated Reporter Law⁴⁴ requires mandatory reporting by

⁴⁰ “Pending Cases Currently Under Investigation at Elementary-Secondary and Post-Secondary Schools as of September 28, 2018 7:30 am Search,” Sept. 28, 2018, <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/open-investigations/tix.html>.

⁴¹ See OCR Case Processing Manual, available at: <https://www2.ed.gov/about/offices/list/ocr/docs/ocrcpm.pdf>

⁴² Georgia’s Mandated Reporter Law provides that “sexual abuse” means a person’s employing, using, persuading, inducing, enticing, or coercing any minor who is not such person’s spouse to engage in any act which involves:

- A. Sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex;
- B. Bestiality;
- C. Masturbation;
- D. Lewd exhibition of the genitals or pubic area of any person;
- E. Flagellation or torture by or upon a person who is nude;
- F. Condition of being fettered, bound, or otherwise physically restrained on the part of a person who is nude;

school teachers, administrators, counselors, visiting teachers, and school psychologists to the Division of Family and Children Services (electronically, and/or 1-855-GACHILD). This means either a direct report, or, in most cases, causing a direct report to be made by a supervisor. Importantly, under the Mandated Reporter Law:

- “Child” means any person under 18 years of age.
- “School” includes everything from pre-K through a college, university, or institution of postsecondary education.
- The standard is whether a mandated reporter has “reasonable cause to believe that suspected child abuse *has occurred*”. This obligation is not phrased with any apparent temporal limitation. Therefore, on the face of the law, if a “mandated reporter” at a school (also defined broadly) becomes aware of a #MeToo allegation of abuse against a child some 30 years ago, they would seem to have an obligation to report it.

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- G. Physical contact in an act of apparent sexual stimulation or gratification with any person’s clothed or unclothed genitals, pubic area, or buttocks or with a female’s clothed or unclothed breasts;
 - H. Defecation or urination for the purpose of sexual stimulation; or
 - I. Penetration of the vagina or rectum by any object except when done as part of a recognized medical procedure.

Sexual abuse shall include consensual sex acts when the sex acts are between minors if any individual is less than 14 years of age; provided, however, that it shall not include consensual sex acts when the sex acts are between a minor and an adult who is not more than four years older than the minor. This provision shall not be deemed or construed to repeal any law concerning the age or capacity to consent.

⁴³ “Sexual exploitation” means conduct by any person who allows, permits, encourages, or requires a child to engage in:

- A. Prostitution, as defined in Code Section 16-6-9; or
- B. Sexually explicit conduct for the purpose of producing any visual or print medium depicting such conduct, as defined in Code Section 16-12-100.

⁴⁴ Georgia Code § 19-7-5.

V. SO ... WHAT IS A SCHOOL TO DO?

A. Have Policies and Procedures In Place

- Craft and publicize comprehensive sexual misconduct policies that have been thoroughly vetted by legal professionals familiar with this area of the law.
- Designate a professional Title IX Coordinator and identify responsible employees.
- Focus on preventative programs, including bystander intervention and definitions of consent.

B. Investigate

- Even if anonymous? **Yes.** Some balancing of credibility/seriousness of complaint is appropriate, but when that anonymous person goes public -- do not want second-guessing.
- How to structure the investigation? Considerations:
 - Who retains the investigator? Your school district/Board? Your general counsel? A legal subcommittee?
 - Internal/external?
 - Is it privileged? Might you waive the privilege? What open records laws apply?
 - What work product do you want? Written report? Oral report?
 - To whom is report going to be delivered?

C. Crisis Management

- Do not get ahead of the investigation.
- Contact insurers right away. Look for historic policies that may provide coverage.
- Consider retaining crisis communications firm. Consider retaining that firm through counsel, to seek to maintain privilege.

- Speak with one voice. Are we assuming responsibility? Investigating? Sorry? Disheartened? The precise word matters.
- Consider whether you want to proactively solicit others who may have similar stories. It carries risk, but is consistent with a bearing of transparency and wanting to do the right thing.

APPENDIX I: Open OCR Complaints Against K-12 Institutions in Georgia

Institution	Type of Discrimination	Open Investigation Date
BARROW COUNTY	Title IX - Sexual Violence	10/11/2017
CHEROKEE COUNTY	Title IX - Retaliation	8/26/2015
CHEROKEE COUNTY	Title IX - Sexual Harassment	8/26/2015
CLAYTON COUNTY	Title IX - Sexual Harassment	5/22/2018
CLAYTON COUNTY	Title IX - Sexual Violence	1/29/2016
COBB COUNTY SCHOOL DISTRICT	Title IX - Athletics	11/8/2017
COBB COUNTY SCHOOL DISTRICT	Title IX - Sexual Violence	12/2/2015
COLUMBIA COUNTY	Title IX - Denial of Benefits	6/15/2016
COLUMBIA COUNTY	Title IX - Others	12/21/2017
DECATUR CITY	Title IX - Retaliation	9/14/2018
DECATUR CITY	Title IX - Sexual Violence	9/14/2018
DEKALB COUNTY	Title IX - Denial of Benefits	12/10/2014
DEKALB COUNTY	Title IX - Denial of Benefits	10/27/2015
DOUGHERTY COUNTY	Title IX - Retaliation	9/6/2018
DOUGHERTY COUNTY	Title IX - Sexual Harassment	9/6/2018
FLOYD COUNTY	Title IX - Sexual Harassment	5/17/2017
FRANKLIN COUNTY	Title IX - Retaliation	3/26/2018
FRANKLIN COUNTY	Title IX - Sexual Harassment	3/26/2018
FULTON COUNTY SCHOOL DISTRICT	Title IX - Athletics	4/18/2013
FULTON COUNTY SCHOOL DISTRICT	Title IX - Dissemination of Policy	7/26/2016
FULTON COUNTY SCHOOL DISTRICT	Title IX - Procedural Requirements	7/26/2016
FULTON COUNTY SCHOOL DISTRICT	Title IX - Sexual Violence	7/26/2016
FULTON COUNTY SCHOOL DISTRICT	Title IX - Sexual Violence	10/18/2017
GAINESVILLE CITY	Title IX - Retaliation	6/25/2018
GLYNN COUNTY	Title IX - Procedural Requirements	3/11/2015
GLYNN COUNTY	Title IX - Retaliation	3/11/2015
GLYNN COUNTY	Title IX - Sexual Harassment	3/11/2015
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Denial of Benefits	2/4/2016
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Discipline	5/3/2017
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Procedural Requirements	8/17/2016

GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Retaliation	9/15/2015
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Sexual Harassment	6/13/2017
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Sexual Violence	3/16/2015
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Sexual Violence	9/15/2015
GWINNETT COUNTY PUBLIC SCHOOLS	Title IX - Sexual Violence	8/17/2016
HALL COUNTY	Title IX - Sexual Violence	1/2/2018
HENRY COUNTY	Title IX - Procedural Requirements	5/5/2016
HENRY COUNTY	Title IX - Retaliation	5/5/2016
HENRY COUNTY	Title IX - Sexual Harassment	5/5/2016
JEFFERSON CITY SCHOOL DISTRICT	Title IX - Procedural Requirements	8/30/2016
JEFFERSON CITY SCHOOL DISTRICT	Title IX - Sexual Violence	8/30/2016
OCONEE COUNTY	Title IX - Athletics	8/25/2015

Appendix II

ATLANTA TECHNICAL COLLEGE	Title IX - Denial of Benefits	6/24/2014
ATLANTA TECHNICAL COLLEGE	Title IX - Others	7/17/2015
ATLANTA TECHNICAL COLLEGE	Title IX - Retaliation	6/24/2014
ATLANTA TECHNICAL COLLEGE	Title IX - Sexual Harassment	6/24/2014
AUGUSTA TECHNICAL COLLEGE	Title IX - Gender Harassment	5/20/2015
CLARK ATLANTA UNIVERSITY	Title IX - Dissemination of Policy	6/3/2015
CLARK ATLANTA UNIVERSITY	Title IX - Procedural Requirements	6/3/2015
CLARK ATLANTA UNIVERSITY	Title IX - Retaliation	12/7/2015
COLLEGE OF COASTAL GEORGIA	Title IX - Retaliation	10/28/2014
COLLEGE OF COASTAL GEORGIA	Title IX - Sexual Harassment	10/28/2014
COLLEGE OF COASTAL GEORGIA	Title IX - Sexual Harassment	2/6/2015
COVENANT COLLEGE	Title IX - Sexual Harassment	11/24/2015
EMORY UNIVERSITY	Title IX - Gender Harassment	6/1/2017
EMORY UNIVERSITY	Title IX - Retaliation	6/1/2017
EMORY UNIVERSITY	Title IX - Sexual Violence	12/13/2013
GEORGIA COLLEGE AND STATE UNIVERSITY	Title IX - Retaliation	8/2/2018
GEORGIA SOUTHERN UNIVERSITY	Title IX - Athletics	9/30/2015
GEORGIA SOUTHERN UNIVERSITY	Title IX - Retaliation	1/19/2018
GEORGIA SOUTHERN UNIVERSITY	Title IX - Sexual Violence	1/19/2018
GEORGIA STATE UNIVERSITY	Title IX - Sexual Harassment	5/26/2015
LIFE UNIVERSITY	Title IX - Gender Harassment	7/26/2017
MERCER UNIVERSITY	Title IX - Others	5/8/2018
MERCER UNIVERSITY	Title IX - Procedural Requirements	8/5/2016
MERCER UNIVERSITY	Title IX - Retaliation	8/5/2016
MERCER UNIVERSITY	Title IX - Sexual Harassment	8/5/2016
MOREHOUSE COLLEGE	Title IX - Sexual Violence	11/19/2015
OGLETHORPE UNIVERSITY	Title IX - Denial of Benefits	10/26/2017
OGLETHORPE UNIVERSITY	Title IX - Sexual Violence	6/23/2015
RIVERTOWN SCHOOL OF BEAUTY	Title IX - Others	6/4/2015
SPELMAN COLLEGE	Title IX - Sexual Violence	11/19/2015