

Two-Day Title IX Conference Day 1: Advanced Track

Erin Butcher, Melissa Carleton, and Rebecca Joseph
June 17, 2025



Welcome!



- Name
- University
- Job Title
- Role on the Title IX Team
- One thing you remember from childhood that today's incoming first-year students wouldn't understand

Rules for Participation

- Use "for the sake of argument..."
- We have built in breaks, but we know life happens. Step away when you need to.
- Today is a great day for questions. Don't hesitate to ask them.

Agenda for Today

- Federal Update on Title IX
- What Title VI Teaches Us About Hostile Environment Analysis
 - 10:15 – Break
- Conducting Effective Intake Meetings
- Tricky Case Assessment and Combining Cases
 - 12:00 -- Lunch
- When Does a Coordinator Sign a Complaint?
- Emergency Removal and Administrative Leave
 - 2:15 – Break
- Building Your Title IX Team in These Trying Times
- Transgender Topics

Federal Update on Title IX

Title IX Sexual Harassment

- February 4, 2025 DCL
 - Supersedes Jan. 31 Guidance
- OCR will enforce the 2020 Title IX Regulations – NOT the 2024 regs
 - Definition of SH
 - Procedural protections
 - "... no portion of the 2024 Title IX Rule is now in effect in any jurisdiction."

- Cases initiated under the 2024 regs "should be immediately reevaluated to ensure consistency with the requirements of the 2020 Title IX Rule and the preexisting regulations at 34 C.F.R. 106 et seq."
- Things to think about:
 - Which cases need to go to a **hearing** now?
 - Remember the 2020 definition of **retaliation** when considering process
 - Do you need a signed **Formal Complaint**?
 - Do your **Notices of Investigation** require additional detail?
 - **Informal Resolution** – remember the limitation imposed by the 2020 regs
 - **Appeals for supportive measures** – Keep?
 - Remember to post your **training materials** if you stopped

Executive Order - Gender Identity

- "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government," Jan. 20, 2025
 - Declares that gender identity is not on the basis of sex
 - Several lawsuits pending

Executive Order Banning Transgender Athletes from Women's Sports

- Feb 5, 2025 – Executive order interpreting Title IX as prohibiting transgender women from competing in women's sports
- Feb 6 – Investigations into University of Pennsylvania's and San Jose State University's allowing transgender women to compete in collegiate athletics
 - March 19 – White House paused \$175M in federal funding, halting faculty research across seven schools
 - April 28 – DOE announced finding that UPenn violated Title IX by allowing a transgender woman to compete on a women's sports team in 2021 and 2022
- Feb 12 – Investigations into the Minnesota State High School League and California Interscholastic Federation
- Feb 22 – USDA Title IX Investigation of University of Maine system
 - USDA announced a "compliance review" of the institution, asserting that Maine was "openly disregarding" the Executive Order
 - March 12 -
- April 4 – DOE and DOJ announced the formation of a "Special Investigations Team" focused on protecting students, particularly female athletes, from "gender ideology"

Title IX and Bathrooms

- May 8 – Western Carolina University
 - "This investigation comes amid allegations that WCU has openly refused to comply with Title IX and to ensure sex-separated intimate spaces in federal funded institutions of higher education. There are also credible reports that WCU allowed a male to room with a female in a girls' dormitory and that WCU opened an investigation against a female student for asking a male student to leave a female locker room."
- Note:
 - 20 USC 1686 states, "[N]othing contained herein shall be construed to prohibit any educational institution receiving funds under this Act, from maintaining separate living facilities for the different sexes."
 - 34 CFR 106.33 states, "A recipient *may* provide separate toilet, locker room, and shower facilities on the basis of sex, but such facilities provided for students of one sex shall be comparable to such facilities provided for students of the other sex." (amended May 19, 2020)

Department of Ed: Title IX Month (1 of 3)

- Press release from ED, June 2, 2025:
- The U.S. Department of Education (the Department) today announced that it is recognizing June as ‘Title IX Month’ in honor of the fifty-third anniversary of Title IX of the Educational Amendments (1972) being signed into law. June will now be dedicated to commemorating women and celebrating their struggle for, and achievement of, equal educational opportunity.
- Announce two investigations

- Investigation: University of Wyoming
 - "[T]he University allowed a man [read: transgender woman] to join a campus sorority."
 - "A school receiving federal funding that supports, sponsors, or promotes a sorority or fraternity, must meet its obligations under Title IX to protect its students from sex-based harassment and sexual assault, regardless of the sorority or fraternity's policy. A sorority that admits male students is no longer a sorority by definition and thus loses the Title IX statutory exemption for a sorority's single-sex membership practices."

- What is that statutory exemption again?
 - Title IX does not apply to membership practices "of a social fraternity or social sorority which is exempt from taxation under [26 USC 501(a)], the active membership of which consists primarily of students in attendance at an institution of higher education" - 20 U.S.C. 1681(b)(6)(A)
- What is the definition of sorority?
 - There isn't one in the law.

Department of Energy Title IX Regs (1 of 3)

- "Nondiscrimination on the Basis of Sex in Sports Programs Arising Out of Federal Financial Assistance" - 90 Fed. Reg. 20786 (May 16, 2025)
- Issued May 16, 2025, Effective July 15, 2025
- Summary: "This DFR amends existing regulations requiring certain funding recipients that sponsor sports teams for members of one sex to allow members of the opposite sex to try out for the team. Accordingly, these requirements will no longer be a factor when recipients operate sports teams."
- Currently the Energy reg is the same as the Title IX reg... but...

Department of Energy Title IX Regs (2 of 3)

- New language:

Separate teams. Notwithstanding the requirements of paragraph (a) of this section, a recipient may operate or sponsor separate teams for members of each sex where selection for such teams is based upon competitive skill or the activity involved is a contact sport. [and then the regulation ends]

Department of Energy Title IX Regs (3 of 3)

- Eliminated language:

However, where a recipient operates or sponsors a team in a particular sport for members of one sex but operates or sponsors no such team for members of the other sex, and athletic opportunities for members of that sex have previously been limited, members of the excluded sex must be allowed to try out for the team offered unless the sport involved is a contact sport. For the purposes of these Title IX regulations, contact sports include boxing, wrestling, rugby, ice hockey, football, basketball, and other sports the purpose or major activity of which involves bodily contact.

[See 5 CFR 1042.450]

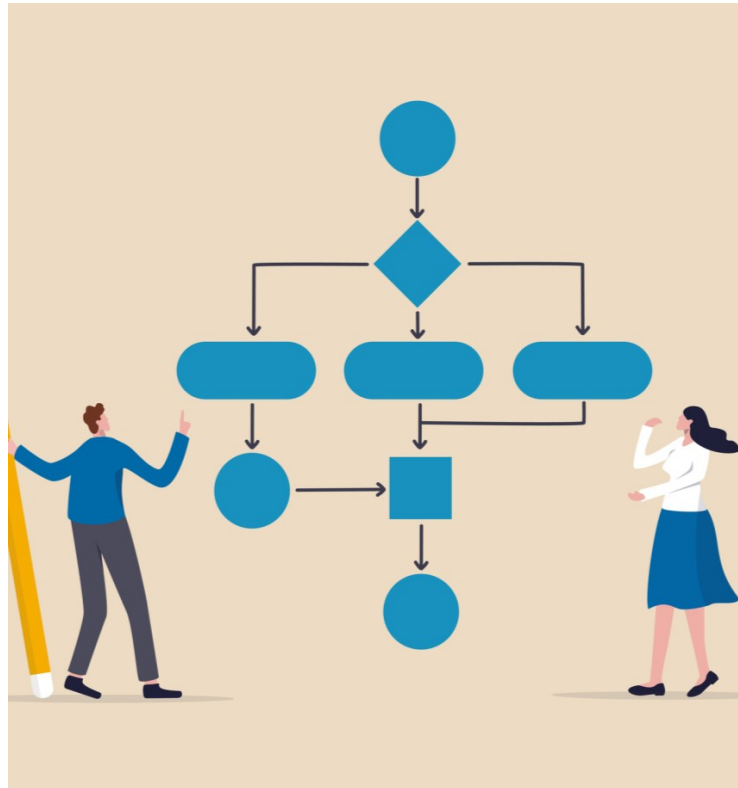
What Title VI Teaches Us About Hostile Environment Analysis

- Title IX adopts and incorporates the procedural provisions applicable to Title VI at 34 CFR 100.6-100.11. (34 CFR 106.81)
- Cumulative hostile environment analysis
 - Repetitive unwelcome conduct toward various complainants by various respondents
 - Repetitive unwelcome conduct toward various complainants by one respondent
- OCR's investigative priorities
 - Gender (Title IX), Antisemitism & Racial Preferences (Title VI)
- Due process considerations
 - Title IX grievance process vs Title VI grievance process

Conducting Effective Intake Meetings

Three Components of Intake

- Supportive Measures, Process, Gathering Necessary Information



Understand the Context

- Our focus today: Trauma-Informed Intake
- Trauma-Informed medical care and mental health support
- Trauma-Informed Education
- Trauma-Informed First Responders
- Trauma-Informed Investigation
- Trauma-Informed Resolutions

Trauma-Informed Basics for Intake Meetings

- Assume all parties and witnesses may be dealing with trauma
 - from this or other incidents
- Meet them where they are
- Help them tell their story as part of the process
- Signs of trauma ≠ policy violation
- No signs of trauma ≠ no policy violation
- If they didn't act the way you might have, that doesn't mean it isn't true.

Title IX Intake Framework

- Institutional response to a report:
 - from this or other incidents
 - Actual knowledge (defined 34 CFR 106.30)
 - "Must respond promptly in a manner that is not deliberately indifferent."
 - Response to actual knowledge must be equitable
 - 34 CFR 106.44(a):
 - The Title IX Coordinator must promptly contact the complainant to discuss:
 - the availability of supportive measures...,
 - consider the complainant's wishes with respect to supportive measures,
 - inform the complainant of the availability of supportive measures with or without the filing of a formal complaint,
 - And explain to the complainant the process for filing a formal complaint.
- Takeaways from the 2020 regulations: **Supportive Measures and Process for Filing a Formal Complaint**

Practical Extensions of this Framework

- Information about the resolution process
 - Necessary for informed decision-making
- Discussion of Title IX Jurisdiction
 - Necessary to discuss the applicable process and potential for Exit Ramps
- Potential discussion of definitions
 - Necessary to discuss the applicable process and potential for Exit Ramps
- Information about the interactions between the parties
 - May be necessary to consider supportive measures

Give and Take

- "I need to provide you with information, and I need you to provide me with information."
- Autonomy whenever possible
 - "Would you like me to talk about the process first? Or would you like to share your concerns with me first? Either is fine, and if you can't decide, I'm happy to help."

Big Picture Concepts

- Give autonomy whenever possible
- Remember the context
 - You are not the decision-maker
 - This is not an investigative interview
 - Give the benefit of the doubt to both parties
- Remember what you know about trauma
 - Memories might be encoded in non-linear ways
 - There may be gaps
 - Self-blame

Why is it important to NOT make assumptions?

- Reporting delays
 - Shame
 - Fear of retaliation
 - Fear of not being believed (Preamble p. 30081)
- Memory lapses
 - A party should not be “unfairly judged due to inability to recount each specific detail of an incident in sequence, whether such inability is due to trauma, the effects of drugs or alcohol, or simple fallibility of human memory” (Preamble, p. 30323)

Structuring Your Intake Meetings

- Use a list of talking points or a checklist, but...
- Be mindful of the human in front of you
- Be flexible and willing to change direction
- Have your policy close by
- Talk about your process
- Talk about **your** definitions (if necessary)

Supportive Measures

- What does your policy say?
- Create a list and use it during every intake
 - Both Complainants and Respondents
 - Put it out there – the person may not realize what they need or what's available to them
- Don't overpromise (ex: housing)
- Must not unreasonably burden the other party
- Confirm the discussion and next steps in a follow-up email after each intake meeting
- If a requested supportive measure is not available, explain the rationale and document the decision



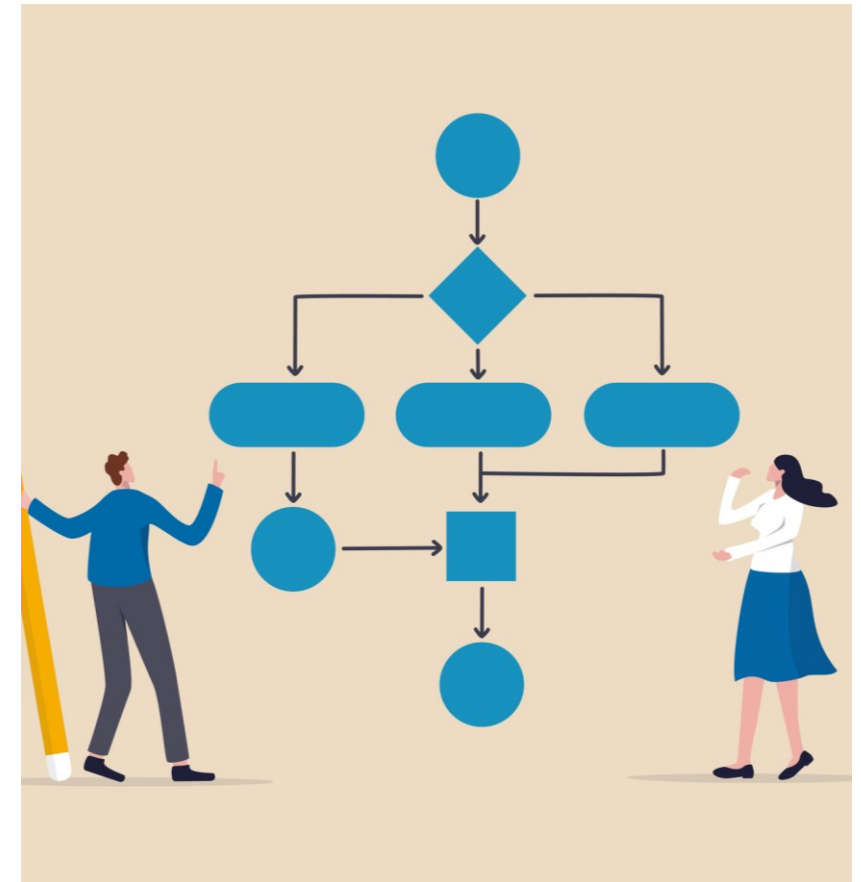
Supportive Measures (2020 Title IX Regs)

34 CFR 106.30(a)

- Non-disciplinary, non-punitive
- Individualized services
- Offered as appropriate, as reasonably available, without fee or charge
- Available before or after the filing of a Formal Complaint
- Available if no Formal Complaint is filed
- "Designed to restore or preserve equal access to the recipient's education program or activity without unreasonably burdening the other party"
 - May include measures designed to protect safety of the parties and the educational environment, or deter sexual harassment

Process Discussion

- What does this look like for you?
 - Review of Policy language
 - Step 1, Step 2, Step 3...
 - Flowchart
- How do you describe the investigation?
- How do you describe the hearing process?
 - Cross-examination
- How do you describe informal resolution?
 - Mutual, informed, written consent
 - Respondent-employees



Process Discussion About Jurisdiction

- What does your Policy say about jurisdiction for Title IX matters?
- Discussion regarding referral/"dismissal"
 - If you know this belongs elsewhere, be transparent
 - If you don't know – you can follow-up later
- Remember: If a Formal Complaint has been filed, the case must be "dismissed"
 - Notice of Dismissal required for both parties
 - Show your work!
 - Make sure the Notice of Dismissal is NOT the first time the person learns of the dismissal

Gathering Necessary Information

- Remember the goal – to determine where this report fits and what might be done about it
- Think of the basic "W" questions – who, what, where, when, why
- Same level of detail needed for an investigative interview?
 - What if you are the TIXC and the investigator?
 - If not, is it better to get fewer details?
 - Remember – meet the person where they are



Gathering Necessary Information (cont.)

- In most cases, you will need to ask for information
 - "And then he did it."
 - "They were toxic."
- What are the required elements in your policy?
 - Understand the definition
 - Break it down



Breaking the Conduct into Elements

1. Review the definition.
2. Break down the definition into elements by making a checklist.
 - Make sure that each element is independent of the others. Don't put multiple elements into one, as it makes the analysis more difficult.
 - Make it clear when there are multiple options for an element. For example, "Must have one of the following..."
3. Re-read the definition. Have you accounted for all of the language in the definition?
4. Are there any **other definitions** that should be included in your element checklist? Examples: consent, incapacitation, etc.

Things that *Aren't* Trauma-Informed

- Multiple meetings to gain additional information
 - It is sometimes necessary – particularly if you are meeting the person where they are
 - But... getting everything you need in one meeting is best
- Shock
- Judgment
- Skepticism
 - "Why are you just now reporting this?"

Tricky Case Assessment and Combining Cases

When Can Cases Be Combined?

- "A recipient may consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances. Where a grievance process involves more than one complainant or more than one respondent, references in this section to the singular 'party,' 'complainant,' or 'respondent' include the plural, as applicable." 106.45(b)(4).

Balancing Act: Factors to Consider

- Is it necessary to consolidate because the failure to do so would result in two different decisions about overlapping facts, possibly leading to conflicting fact-finding?
- Is it more efficient to handle the claims in one case?
- Is it appropriate, or even necessary, for multiple complainants (or multiple respondents) to know about what other complainants/respondents experienced?
- Will the consolidation affect the credibility analysis?
- Will the consolidation be more prejudicial than probative?

Hypo: A Busy Faculty Member

- Professor teaches three classes.
- In Class One, he makes multiple overtly sexual comments to Student A and Student B.
- In Class Two, he makes one overtly sexual comment to Student C, who is friends with Student A.
- In Class Three, he makes one overtly sexual comment to Student D, who comes forward independently and wants to pursue a formal complaint.
- How is this handled? What are the charges?

Pattern Evidence

- Pattern evidence is not defined in every policy, but is often referred to as behavior by respondent that was not directed towards complainant but is substantially similar to what complainant reported.
- Substantially similar conduct may bolster the complainant's credibility.
- If complainant and the other student have talked extensively, it may appear they have coordinated stories, which may cut against their credibility.
- If complainant and the other student have never met and describe similar but unusual circumstances, that can bolster the complainant's credibility.

Pattern Evidence: Respondent's Perspective

- Will respondent be notified of the pattern evidence and, if so, how?
- How will respondent be offered the opportunity to respond?
- Is it pattern evidence or character evidence?
 - Substantially similar isn't just "he was bad to me and you"
 - Substantially similar isn't "he was bad to me, and then he was bad to you in a different way, and so therefore he's bad"
- How can pattern evidence be issued if no findings were made on the supposedly similar behavior?

Hypo: The Thief

- Student A and Student B meet on Tinder and decide to meet up for sex
- Student A is unhappy with the hookup and believes it was nonconsensual
- Student A makes a report to the Title IX Coordinator, but declines to pursue an investigation
- Student A notes that Student B stole a framed photograph from Student A's room
- Student C later reports a negative encounter with Student B and notes that Student B stole a framed photograph from Student C's room
- Student C wishes to move forward
- What next?

Hypo: Team Misconduct

- An assistant coach makes highly sexualized comments to Students 1, 2, 3, and 4
- None of the claims rise to the level of severe, pervasive, and objectively offensive as to any complainant, but may collectively demonstrate such behavior
- All of the students were witnesses to each other's allegations
- Do these cases get combined?
- If so, how do you structure the reports to best protect the confidentiality of the students as to each other's stories?

When Does a Coordinator Sign a Complaint?

Formal Complaints

- Formal Complaint means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegation of sexual harassment. 106.30(a).

Is the Coordinator a Complainant?

- No!
- Definition of complainant – 106.30(a) - "An individual who is alleged to be the victim of conduct that could constitute sexual harassment."
- Clery Act gives the complainant certain rights.

Considerations for Signing

- Does the complainant want the coordinator to sign?
- Will the complainant participate?
- Is there a reason to move forward even if the complainant won't participate?
 - Violence/severity
 - Serious claims against an employee
 - Repetitive nature of claims
 - Availability of other evidence regarding case

Hypo: Timid Tina

- Tina's professor has been sexually harassing her
- The professor teaches a small discussion-based class that is necessary for Tina's graduation
- Tina is terrified of retaliation
- How do we handle Tina?

Hypo: Bold Bill

- Bill has been undergoing sexually-based hazing on his athletic team
- Bill wishes to participate in an investigation against the seniors on the team but is worried about retaliation from other teammates
- Bill does not want to be perceived as having brought the case forward
- How do we handle Bill?

Hypo: IPV

- Zig reported experiencing violence within a dating relationship, including physical assaults and being threatened with a knife
- Zig is concerned that moving forward with a process may become dangerous
- How do we handle Zig?

Hypo: Caught on Camera

- Cam is caught on surveillance footage punching Karma (their significant other) in the face
- Two eyewitnesses report the situation to the Title IX office
- How do we handle this case?

Hypo: Angry Mob

- Ten students come forward with sexual harassment concerns about a custodian in the music building
- Some of the students wish to pursue a formal complaint
- Some of the students wish to participate but do not want to sign a formal complaint
- Some of the students do not wish to participate as complainants
- How do you handle this case?

Emergency Removal and Administrative Leave

Emergency Removals

- Available under 106.44(c)
- Applies only to students
- Must undertake an "individualized safety and risk analysis" and "determine that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal"

Analysis

- Who does your individualized safety and risk analysis?
- How is their decision documented?
- Is there a lesser step that will provide the needed safety for the community?

Hypo: Exuberant Sally

- Sally is pursuing a relationship with Jeff, but Jeff isn't interested
- Sally is following Jeff around, sitting outside his classrooms, and leaving him notes on his door and his car
- One of the notes states, "If I can't have you, no one can"
- Jeff asks for Sally to be removed from campus
- Is emergency removal appropriate?

Hypo: Exuberant Sally 2

- Your office sends Sally and Jeff a mutual no-contact order
- Sally responds to your office and states that she isn't any harm to Jeff and she doesn't think a no-contact order is necessary
- Sally copies Jeff on the email
- Is emergency removal appropriate?

Hypo: Exuberant Sally 3

- Jeff goes to Sally's building and sits in the lobby
- Sally comes to the lobby and sits there to wait for her friend to pick her up
- When Sally leaves the lobby, she tells Jeff, "see, that wasn't so bad, was it?"
- Is emergency removal appropriate?

Hypo: Sexual Assault on a Saturday

- Early on a Sunday morning, Jim reports a sexual assault from the previous night
- Jim reports that the respondent, Jason, was incredibly drunk and likely did not know what he was doing
- Jim and Jason are roommates, and Jim is afraid to go back to his room
- Is emergency removal appropriate?

Emergency Removal Challenges

- When a student is subject to emergency removal, they must be provided with notice and an opportunity to challenge the decision immediately following the removal. 106.
- What does this mean?

Hypo: Kai Wants to Stay

- Kai's partner Kevin accuses Kai of engaging in a violent sexual assault
- This is not the first report against Kai, but it is the first time anyone has wanted to pursue a complaint
- The team removes Kai from campus and allows Kai to finish classes online
- Kai is no longer allowed to stay in the room he paid for, eat the food he paid for, or participate in swimming, where Kai is likely pursuing Olympic eligibility
- Kai wishes to challenge the emergency removal
- If you were Kai, what are your best arguments to stay?
- If you were hearing the case, what else would you want to know?

Administrative Leave

- Recipients may place non-student employee respondents on administrative leave during the pendency of a grievance process that complies with 106.45. 106.44(d).

Hypo: Ray the RA

- Ray the RA is accused of sexually harassing the residents on his floor.
- None of the residents wish to pursue a formal complaint against Ray at this time.
- Can you put Ray on administrative leave?
- If you put Ray on administrative leave, do you have to pay him?
- Can you put Ray on emergency removal?
- What would you do with Ray here?

Hypo: Tentatively Speaking

- Professor Adams has been accused by a student of engaging in sexual assault during office hours in his office.
- The student is not sure whether he wants to pursue a formal complaint.
- Can you put Professor Adams on administrative leave?
- Can you emergency remove Professor Adams?
- What would you do here?

Building Your Title IX Team in These Trying Times

The Magic Formula

- Hire them to do only one thing
- Train them to do that thing
- Pay them a lot to do that one thing

The More Realistic Formula: Identify the Right People

- Watch for individuals with transferrable skills
 - Residence life
 - Human resources
 - Recovering lawyers or social workers
- Watch for individuals who are "systems thinkers" or "process thinkers"
- Watch for individuals who can compartmentalize their emotions
 - Do they have a good plan for self care?
 - Are they able to handle difficult conversations without breaking down?
- Watch for individuals who have a strong desire to do something meaningful

The More Realistic Formula: Choose Roles Appropriately

- Team Roles:
 - Coordinator
 - Investigator
 - Decision-Maker
 - Advisor
 - Informal Resolution Facilitator
- "I want to fight for women"
- "I'm a survivor so I know it's tough"
- "My brother got falsely accused. It's more common than you'd think"
- "No judgment here – I just want to make sure people are supported"

The More Realistic Formula: Balance Your Busy-Ness



- Does this team member realistically have time to assist with one more thing?
- Does this team member have a "busy" time of year when they will be virtually unavailable?
- (Do all our team members have the same "busy" time?)
- Will we have to pay this team member overtime?

The More Realistic Formula: Training Up

- Open up Title IX team training to a larger group of employees to create a pool of team members
- Offer stipends for team member assistance to encourage individuals to step up
- Offer titles to assist in job searches
 - Yeah, this might not help you. But it will help other institutions, and if we all do it, we're slowly building up our collective reserves
- Give opportunities for socialization among team members in conjunction with training

Sharing Personnel?

- What are the barriers to sharing personnel with other institutions for purposes of Title IX investigations?
- What could make such sharing easier to accomplish?

-
- Institutions with more cases may find it cheaper to hire internally
 - Institutions with only a few cases may find it cheaper to outsource
 - If you are only going to outsource part of the process, outsource the hearing officer role

- If so-and-so wins the lottery and bails to Tahiti tomorrow, what is your plan?
- Consider building relationships that can assist down the road
 - Current students
 - Grad students
 - Excellent employees that can't move up in their department
 - Excellent employees that may be bored but might be more engaged if they are involved on your team

Searches

- The best search is the one you don't have to conduct
- Go to conferences and meet people
- Keep a wall of post-it notes

Transgender Topics

Definition of Sex

- *Bostock* – Sex includes transgender status for purposes of Title IX
- Open question – does sex include transgender status for purposes of Title VII?
 - Executive Orders state there are only two sexes
 - Current precedent in the Sixth Circuit appears to support gender identity as a concept and a protected trait, but the case law is getting older

-
- Reminder: Religious institutions are not required to enforce Title IX in a manner that violates the tenets of their faith.
 - If you are a religious institution:
 - What happens if a transgender athlete arrives on your campus to compete?
 - What happens if your students participate in joint programs with other institutions where they are assigned to room with transgender students?
 - How else might you encounter a transgender individual, even if your institution does not otherwise typically enroll or employ them?

Current Enforcement Actions

- Sorority membership
- Overnight trip room assignments with minors
- Transgender athletes

-
- Title IX prohibits discrimination on the basis of sex, except that the prohibition does not apply to membership practices of a social fraternity or social sorority which is exempt from taxation under section 501(a) of title 26, the active membership of which consists primarily of students in attendance at an institution of higher education. 20 U.S.C. 1681(a)(6)

Overnight Stays/Residence Assignments

- A recipient may provide separate housing on the basis of sex. 34 CFR 106.32(b)(1).
- A recipient may provide separate toilet, locker room, and shower facilities on the basis of sex, but such facilities provided for students of one sex shall be comparable to such facilities provided for students of the other sex. 34 CFR 106.33.

- A recipient may operate or sponsor separate teams for members of each sex where selection for such teams is based upon competitive skill or the activity involved is a contact sport.
- However, where a recipient operates or sponsors a team in a particular sport for members of one sex but operates or sponsors no such team for members of the other sex, and athletic opportunities for members of that sex have previously been limited, members of the excluded sex must be allowed to try-out for the team offered unless the sport involved is a contact sport.
- For the purposes of this part, contact sports include boxing, wrestling, rugby, ice hockey, football, basketball and other sports the purpose or major activity of which involves bodily contact. 34 CFR 106.41.

-
- "Keeping Men Out of Women's Sports" - This EO is being challenged by lawsuits in California and New Hampshire

-
- Many cases are addressing what, if anything, an institution may tell a parent about their child's transition.
 - K-12 school districts are finding this question incredibly challenging, and there are cases pending around the country.
 - Parents don't have FERPA rights at the higher education level.
 - When would your institution disclose such information?
 - What exception might it use to disclose such information without consent?
 - When a student transitions, what name should your records reflect?

Thank You

