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January 29, 2025

Re: Title IX Policy Update

Dear Thrun Policy Service Subscriber:

We know that mid-year Policy updates can be disruptive. While we do our best to avoid them, the reason for the updates is often out of our hands. As you may have heard, on January 9, 2025, a federal court issued an order vacating the 2024 Title IX regulations entirely, declaring them “unlawful.” That means that all schools must follow – and have a policy that complies with – the 2020 Title IX regulations rather than the 2024 regulations. The 2024 regulations required significant policy changes and reverting back to the 2020 regulations unfortunately requires the same. The enclosed revisions to Policies 3115-3115H, 3118, 4101, 4102, 4104, 4105A, 5202, and 5206 (and applicable forms) reflect the court’s ruling and include all required changes. Because the court’s ruling became effective immediately and was issued without advance notice, we recommend promptly making the enclosed revisions.

Pursuant to the 2020 Title IX regulations, schools must have a separate Title IX sexual harassment policy that includes specific requirements. Policy 3118 will again be a stand-alone Title IX policy. This Policy is substantially similar to the Policy that your District had in place before August 1, 2024 if you were a Thrun Policy Subscriber at that time.

All other policies identified above have been revised to, among other things, remove various obligations outlined in the 2024 Title IX regulations that no longer apply and specify that the grievance procedure outlined in Policies 3115-3115H does not apply to allegations of Title IX sexual harassment.

Policy subscribers with questions about these policy changes should contact a [Thrun Title IX attorney](#). If your district requires a refresher on the 2020 Title IX regulations, Thrun is hosting virtual 2020 Title IX Comprehensive Training on February 20, March 19, April 24, and May 28 of 2025. Registration information can be found on our [Events Page](#).

Very truly yours,

THRUN LAW FIRM, P.C.

Policy Update Summary
Thrun Policy Update – January 29, 2025

Board Policy Manual	
Policy / Form	Revision(s) Made
3000 Series	
Policies 3115-3115H	Policies 3115-3115H have been updated to remove various obligations outlined in the 2024 Title IX regulations that no longer apply and specify that the grievance procedure outlined in Policies 3115-3115H does not apply to allegations of Title IX sexual harassment, which is now addressed by Policy 3118. Note that Policy 3115G is now Intentionally Left Blank.
3115-F-2 Sample Notice of Nondiscrimination	This form was removed from the policy service materials. While schools still need nondiscrimination notices, 3115-F-2 met the requirements of the 2024 regulations and contained more information than is now legally required.
3118 Title IX Sexual Harassment	Pursuant to the 2020 Title IX regulations, schools must have a separate Title IX sexual harassment policy that includes specific requirements. Policy 3118 will again be a stand-alone Title IX policy. This Policy is substantially similar to the Policy that your District had in place before August 1, 2024 if you were a Thrun Policy Subscriber at that time.
3118-F-1 Title IX Sexual Harassment Formal Complaint Form	New Title IX formal complaint form that complies with the 2020 regulations.
4000 Series	
4101 Non-Discrimination	Updated to address references to the Title IX policy.
4102 Anti-Harassment	
4104 Employment Complaint Procedure for Allegations Implicating Civil Rights	
4105A Pregnancy Workplace Accommodations for Employees and Applicants	Removed reference to Policy 3115G.
5000 Series	
5202 Unlawful Discrimination Harassment and Retaliation Against Students	Updated to address references to the Title IX policy.
5206 Student Discipline	