



STETSON LAW

47th National Conference on Higher
Education Law & Policy

Civil Rights Bootcamp: Building a Core Foundation for Title VI, IX, and Equity Compliance in the Edupocalypse Era

Jody Shipper & Emma Hempel

GRAND RIVER | SOLUTIONS

MEET YOUR FACILITATORS



Jody Shipper

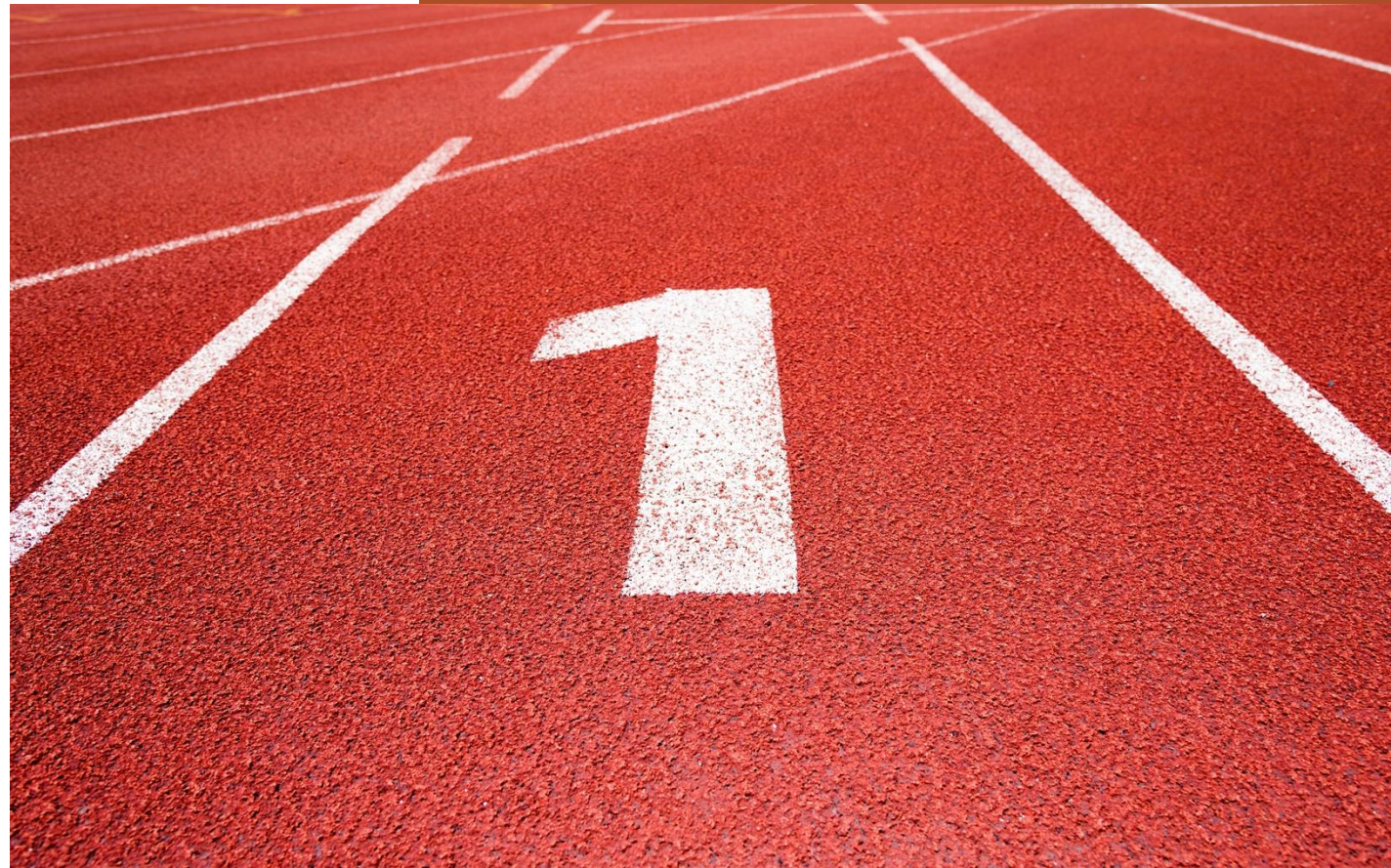
Jody Shipper, J.D., serves as a Co-Founder and Managing Director of Grand River Solutions. A nationally-recognized subject-matter expert with more than 25 years of experience in Title IX and related fields, she is known for her insight into best-in-class programming, policies, and community outreach aimed at addressing sexual misconduct on campus. She lectures extensively at universities and conferences throughout the U.S. on Title IX, VAWA, harassment, and implementation of best and emerging practices.



Emma Hempel

Emma Hempel is the Regional Account Manager for the Northeast at Grand River Solutions. She comes to this role after being an essential part of the Director and Coordinator Services Team for nearly four years. She is frequently sought after as a trainer and has trained thousands of individuals across the country on Title VI, Title IX, and other equity topics. With over 15 years of experience in higher education, Emma has served as Title IX and EEO Coordinator for both large and small public and private institutions across the country.

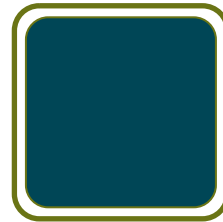
PART 1



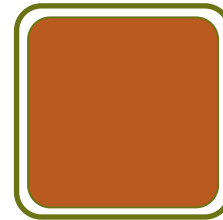
AGENDA Part 1.



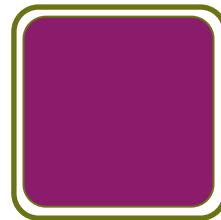
Title VI, Title VII, Title IX
Scope and Practice



Addressing Complaints
& Concerns



Policy & Framework



Scenarios & Questions

TITLE VI, TITLE VII, AND TITLE IX

And why it matters

Federally Protected Classes & the Basics of Titles VI, VII, & IX and More



FEDERALLY PROTECTED CLASSES

These groups or identities are protected from discrimination and harassment, under a combination of statutes

- Sex*
- Pregnancy
- Race
- Color
- Religion
- National Origin (ancestry & ethnicity)
- Disability
- Genetic Information
- Military Status
- Age (over & under 40)

TITLE VI

- Prohibits discrimination in federally funded programs
- Applies to student and employees as either respondents or complainants

Prohibits discrimination based on:

- Race
- Color
- National Origin

Covers students who or are perceived to:

- Share ancestry or ethnic characteristics
- Have citizenship or residency in a country with a dominant religion or distinct religious identity (2023 OCR DCL)

TITLE VII

Title VII covers:

- Discrimination in the workplace
- Employee v. Employee claims
- Employee complainants targeted by third-parties

Discrimination based on:

- Race
- Color
- National Origin
- Sex
- Religion

Exception for religious educational institutions in hiring & exempts certain religious employees from the

HOSTILE ENVIRONMENT HARASSMENT: TITLES VI & VII

Hostile environment under Title VI:

- Severe, pervasive **or** persistent
- Interferes with or limits participation or benefit from services, activities or privileges
- Determined by a reasonable person

Hostile environment under Title VII:

- Severe **or** pervasive
- Creates an objectively intimidating, abusive or offensive work environment
- Determined by a reasonable person in the employee's position

TITLE IX

Title IX covers:

- Sex discrimination in federally funded education programs and activities
- Employees & students & others participating in an education program or activity as either complainants or respondents

Title IX's regulations are:

- Specific to sexual harassment which occurs within an educational program or activity
 - Hostile environment
 - Quid pro quo
- Include sexual violence as a form of sexual harassment
 - sexual assault
 - domestic violence
 - dating violence
 - stalking

We will focus on the definition of hostile environment under Title IX which differs from hostile environment under Titles VI & VII.

TITLE IX

If at least **one** allegation may meet a definition of Title IX sexual harassment, it's best to **use your Title IX-compliant procedure** to address **all** the allegations.

Title IX supersedes Title VII:

- Unlike Title VII, Title IX is specific to educational institutions.
- Title IX requires a higher level of due process.

Some policy structuring options:

- One policy for conduct prohibited by Title IX; or
- One policy for all sexual misconduct (Title VII & Title IX), and separate policy for other forms of harassment and discrimination; or
- One policy for all, but with separate processes

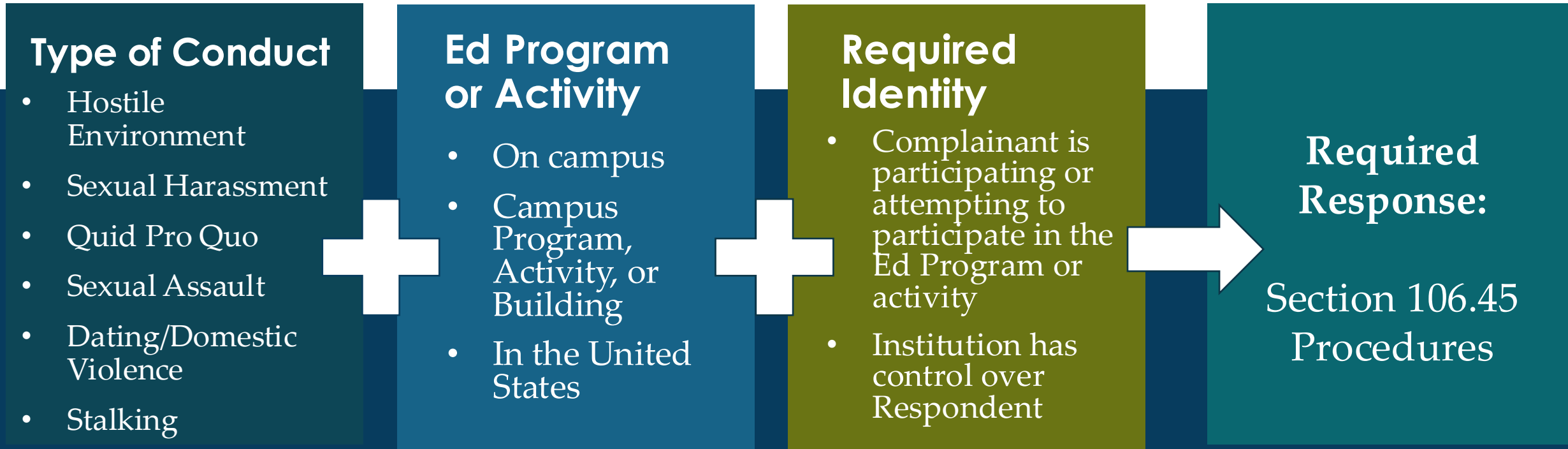
HOSTILE ENVIRONMENT HARASSMENT: TITLE IX

Hostile environment under Title IX:

- Unwelcome conduct based on sex
- Severe, pervasive **and** objectively offensive
- Denies equal access to the institution's education program or activity
- Determined by a reasonable person

Best practice: Consider resolving sexual harassment hostile environment complaints under your Title IX-compliant procedure using two definitions of hostile environment.

TITLE IX APPLICATION (POST-MAY 2020)



FORMAL COMPLAINT & NOTICE REQUIREMENTS UNDER TITLE IX



FORMAL COMPLAINT FILED

By Complainant

**By the Title IX
Coordinator**

FACTORS TO CONSIDER WHEN DETERMINING WHETHER TO FILE A FORMAL COMPLAINT



Allegations of
Violence



Threats

Use of
Weapons



Serial
Predation



A FORMAL COMPLAINT MUST INCLUDE:

The Complainant's digital or physical signature, or an indication that the Complainant is the person filing the Formal Complaint;

An allegation of Prohibited Conduct as defined under this Policy. This may include: Where the incident(s) occurred; what incident(s) occurred; when the incident(s) occurred;

Identity of Respondent, if known;

A request for [a](#) resolution or investigation.

Requiring a Formal Complaint in a Title VI or Title VII case would conflict with those statutes. You would likely need to investigate with, or without, a Formal Complaint.

What will you use instead?

PRO TIP

DISMISSING TITLE IX COMPLAINTS

Mandatory

- Not sexual harassment
- Did not occur in program or activity
- Not against person in the U.S.

Discretionary

- Complainant withdraws complaint
- Respondent no longer enrolled/employed
- School unable to collect sufficient info

KEY DIFFERENCES

01

NOTICE

- Actual notice?
- Formal Complaint?
- Knew or should have known
- Required reporting/referrals

02

PROCESS

- Advisors
- Evidence Review
- Notice letters
- Emergency removals
- Appeals

03

HEARINGS

- Do you need a hearing?
- Hearing advisors?
- What type of questioning?

A PAUSE FOR POLICY

Assessments of reports & allegations are based on institutional policy. Always follow your policy.

Your policy may go beyond statutory requirements.



THE GENERAL "RULE" FOR PUBLIC INSTITUTIONS

- Some Circuit Courts have concluded “some” form of questioning among the parties is a due process minimum, such as by questions posed to parties and witnesses through a hearing panel.
- Ninth Circuit: No hearing needed
- Many say indirect questioning is satisfactory, adversarial questioning is not necessary

OF COURSE, THERE ARE “THOSE” CIRCUITS

- *Doe v. Baum*, 903 F.3d 575, 581 (6th Cir. 2018): due process at public institutions would require some form of live cross-examination in “credibility” cases
- *University of the Sciences* (3rd Circuit): “fair process” at private university would require “the modest procedural protections of a live, meaningful, and adversarial hearing and the chance to test witnesses’ credibility through some method of cross-examination”
- 9th Circuit: requiring private universities to conduct the hearing envisioned by the court of appeals was contrary to fair procedure caselaw.

ENSURING YOUR POLICY ADDRESSES THE ELEMENTS OF EACH STATUTE

VI

Definitions

May need to investigate without a respondent

No formal complaint

You design process

Use best of Title IX, not all of it

VII

Definitions

Must investigate if supervisor is involved

No formal complaint

You design process unless it overlaps with Title IX

Use the best of Title IX, not all of it

IX

Follow the Regs

Emphasis on process

ADDITIONAL PRO TIPS

Resources: Beware using your victim advocates for Title VI, Title VII cases

Data management is the same for all: If it's not documented, you didn't handle it

Notice letters, whether required are not, are always a best practice. Just ask the local courts . . .

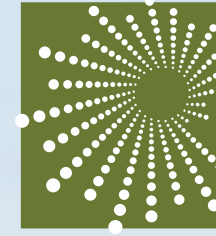
Sharing the full written report: Your needs and goals may differ

Transparency in process should be a key part of every equity policy and process

Hearings . . . Let's talk about it

A mobile app.

It's up to you what you do with it. .



CASE
TRACKER



PART 2



SESSION 2

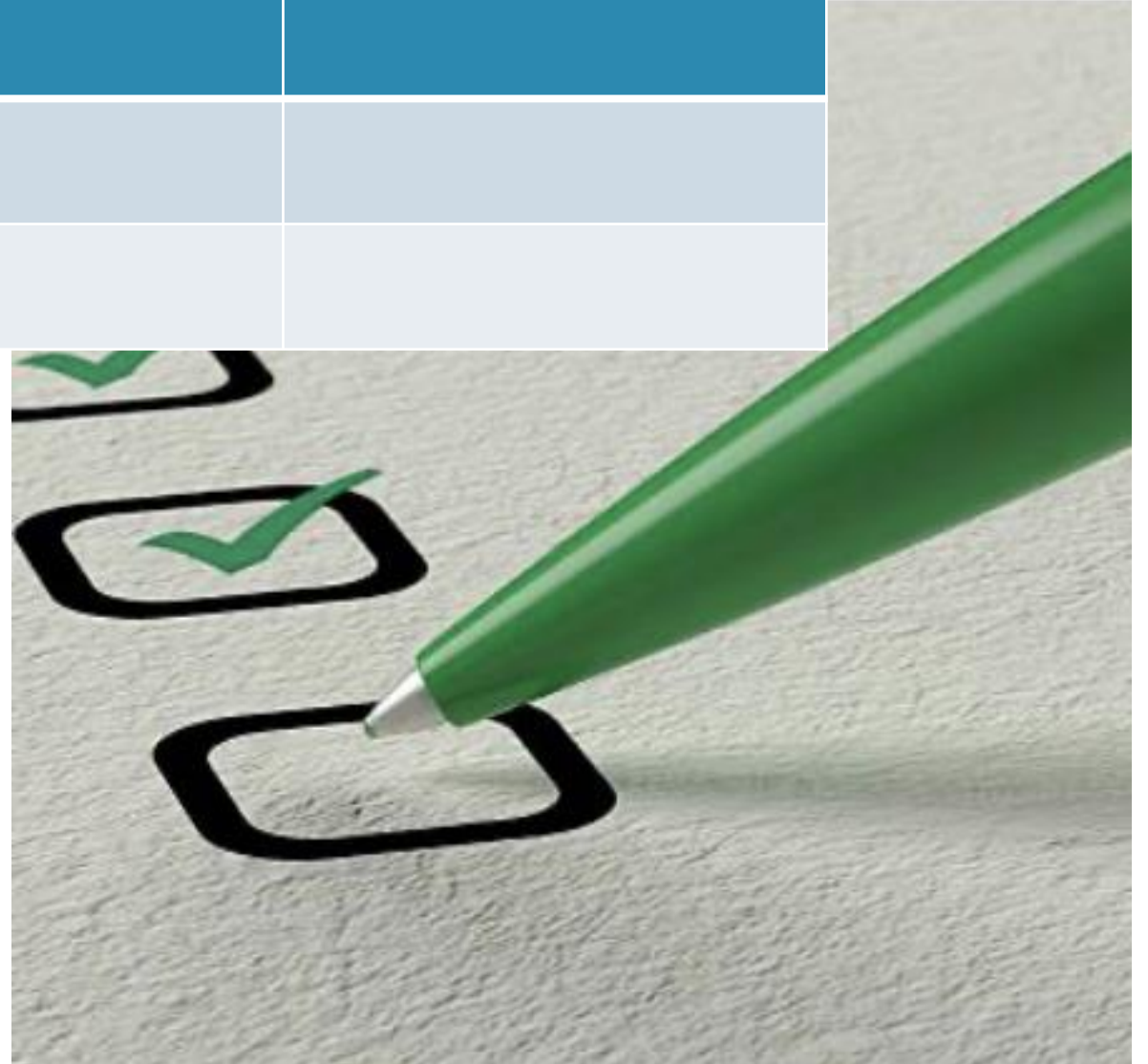
- ✓ How to set offices up for success.
- ✓ How offices can be structured
- ✓ Best practices in aligning office structures with your policies and processes
- ✓ How to identify and work with campus stakeholders
- ✓ Gathering and sharing data (who can see what data)

STRUCTURING YOUR TITLE VI/VII/IX OFFICE(S)

Some thoughts about structures

WHAT IS REQUIRED

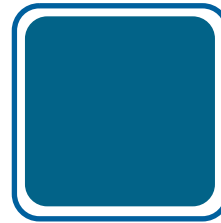
- One (1) Title VI Coordinator, or more, no limit
- There is no such constraint on the number of equity directors/coordinators
- There is no guidance requiring a Title VI Coordinator, but guidance documents and resolution agreements suggest this is a best practice



STRUCTURE, SOME OPTIONS



All in one place
Efficiencies, development of skills



Title IX stands alone
“Narrow IX,” or all sex-based cases?



Each with its own office
Inefficiencies and risks



A little here, a little there
We have thoughts

PLACEMENT: WHERE SHOULD THE OFFICE(S) REPORT



STRUCTURING THE WORK WITHIN THE OFFICE



Who does what work?
“Everything bagel” style, or
“Swim Lane” style

POLICY AND OFFICE STRUCTURE: HOW ONE IMPACTS THE OTHER



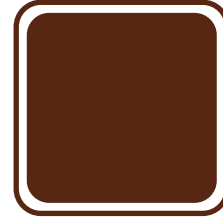
DATA SHARING BETWEEN OFFICES

- ✓ Your policy should have explicit information
- ✓ Files go with the transfer
- ✓ No, there's not a FERPA problem
- ✓ Handling intersectional cases
- ✓ Handling parallel cases

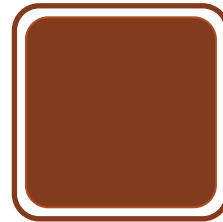
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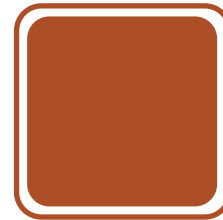
AGENDA PART 3



Outreach and Intake



Report Resolution



Case Studies



Questions

INITIAL OUTREACH

Outreach

- How and When to Conduct Initial Outreach
- Elements of Initial Outreach
- Follow-up Frequency
- Document Management

HOW ARE YOU CONDUCTING OUTREACH?



CONDUCTING OUTREACH: BEST PRACTICES



- Identifying Complainant/Party
- Electronic/Email vs Phone Call
- Safety Concerns
- Utilize Case Management Systems (where possible)
- Communication Styles and Outreach Content

ELEMENTS IN INITIAL OUTREACH

- Introduction of name/role/scope of your work/office
- Context for the outreach (why you are reaching out)
- Right to make a report
 - *To institution*
 - *To police*
 - *No report at all*
- Confidential/non-confidential resources
- On campus resources, community resources
- Invitation to meet
- Support Person
- Policy link
- VAWA Resources, if applicable

PRO TIP

- Tailor outreach communications to the likely policy
- Tailor resources as appropriate
- Templates help avoid errors

FOLLOWING UP

- How many follow-up outreaches do you conduct?
- Is there ever a time where you do more or less?
- How frequently do you conduct outreach?
- What do the follow-up attempts look like?



PREPARING FOR THE INTAKE

Preparation Before The Meeting

PREPARING FOR THE INTAKE MEETING

- Familiarize yourself with names/parties
- Identify areas where you need additional information or clarity
 - What else do you need to know to connect conduct to policy?
- Review relevant policies
 - Will the Coordinator/Director need to move forward to investigate?
- Protective measures (admin leave, emergency removal, timely warning)
- Relevant supportive measures

ACTIVITY 1: INCIDENT REPORT

What follow-up questions would you want to ask during your initial intake? What context would be important to know?

I, Brittany Christina, Professor in the English Department, was approached by my student, Sammy Ward, who stated that they were sexually assaulted by Dylan Cripe. Sammy was extremely upset, and it was very difficult to understand as they were talking through their sobs. They stated that they and Dylan were at a party when they began to have an argument and decided to go outside to figure it out. Sammy said that Dylan then assaulted Sammy and shouted a slur when they went outside and no one else was around to witness the event.

Goals of an initial intake meeting



GOALS OF THE INTAKE MEETING

- Review supportive measures and pathways for resolution
- Gather enough information to connect conduct to policy
- Discuss the options for resolution or retention of the complaint
- Are there others similarly impacted (Title VI)
- Be forthcoming about responsibility to move complaint forward (if applicable)
- Safety? Threat assessment referrals? Clery? HR? Student support?



**How does an
investigative
interview differ
from an initial
intake meeting?**



ESTABLISHING RAPPORT



THINK, PAIR, SHARE:

- How can you establish rapport?
- What are some things that you should **not** say to build rapport?
- What are environmental elements/choices that are important for this meeting?

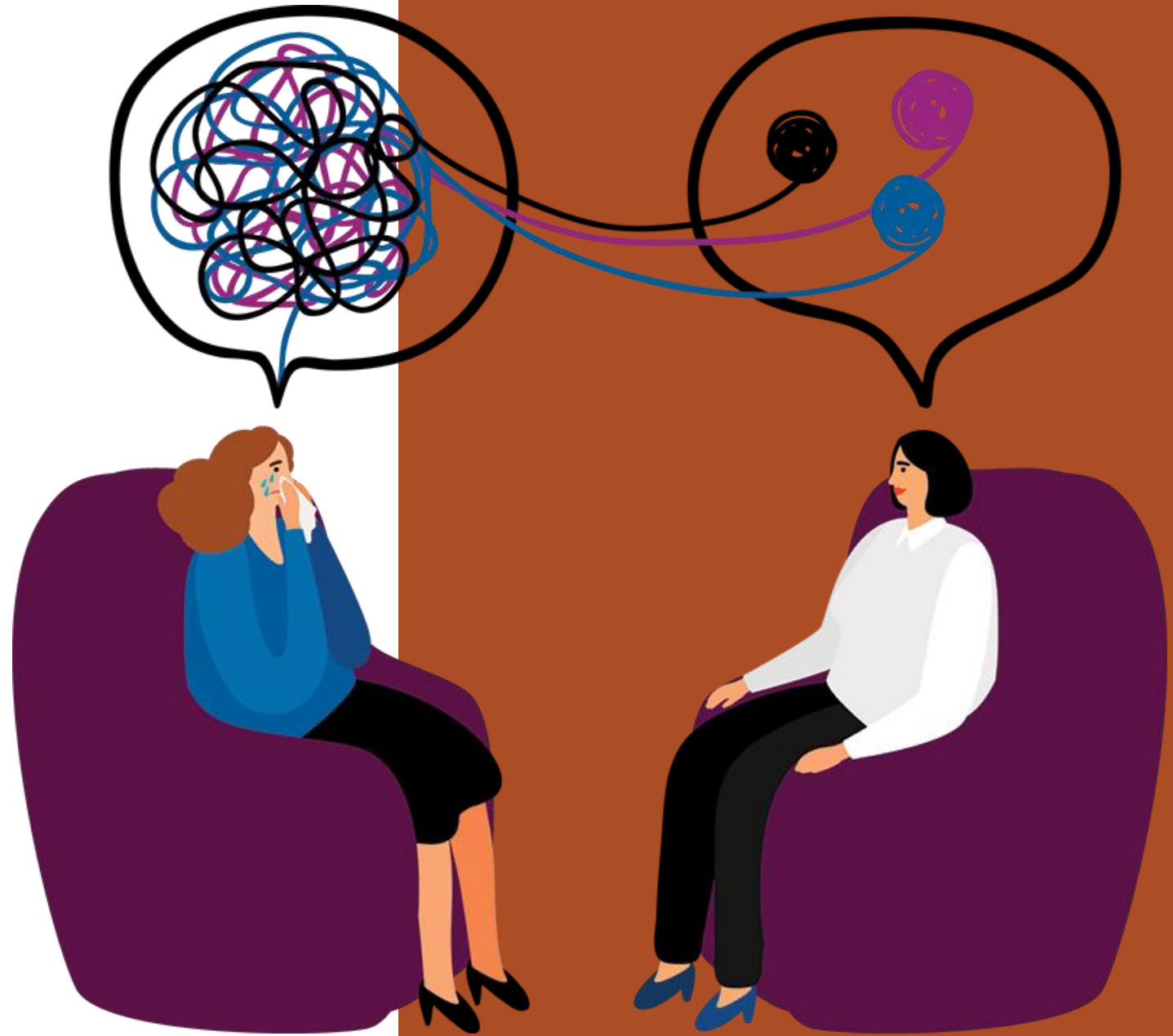


ESTABLISHING RAPPORT: VERBAL COMMUNICATION

- Verbal communication tips
 - Ice-breaker questions/conversation
 - What to say and not to say
 - Tone of voice
 - Restate the purpose of the meeting/scope of the meeting
- Ask open ended questions
 - Help me understand...
 - Can you tell me more about...
- Be comfortable with silence



**WHAT ARE THE
HARD QUESTIONS
FOR YOU TO ASK?**



HOW TO ASK THE HARD QUESTIONS

- Lay a foundation
 - Explain why you are asking
- Be deliberate and mindful
 - “Can you tell me more about....”
 - “Help me understand what you meant when you said...”
 - “Are you able to tell me more about...”
 - “Tell me more about how this has impacted you...”



DISCRIMINATION V. UNPROFESSIONAL BEHAVIOR:

How to assess reports so that they are handled under the correct policy and process

YOU RECEIVE A REPORT

- ✓ Is this for your office?
- ✓ If so, which policy?
- ✓ Should you transfer this to HR/Student Conduct?
- ✓ Is this just something a dean or chair can handle?
- ✓ Is this just a classroom management problem?

STEP 1: IS THIS AN EQUITY CASE?

As reported, is there a potential causal connection between the conduct & the complainant's protected class?

Did the conduct occur because of a protected class?

Pro-tip:

Does it matter if this is about complainant's protected class, or if it is about someone's protected class?

Check recent Title VI guidance for the answer.

IDENTIFYING A CAUSAL CONNECTION

Assessment
≠
Finding



If everything reported is true, is there a link between the alleged conduct and a protected class?

Gather more
facts



“Please share some examples of what was said.”
“Can you help me understand the context of the comments.”

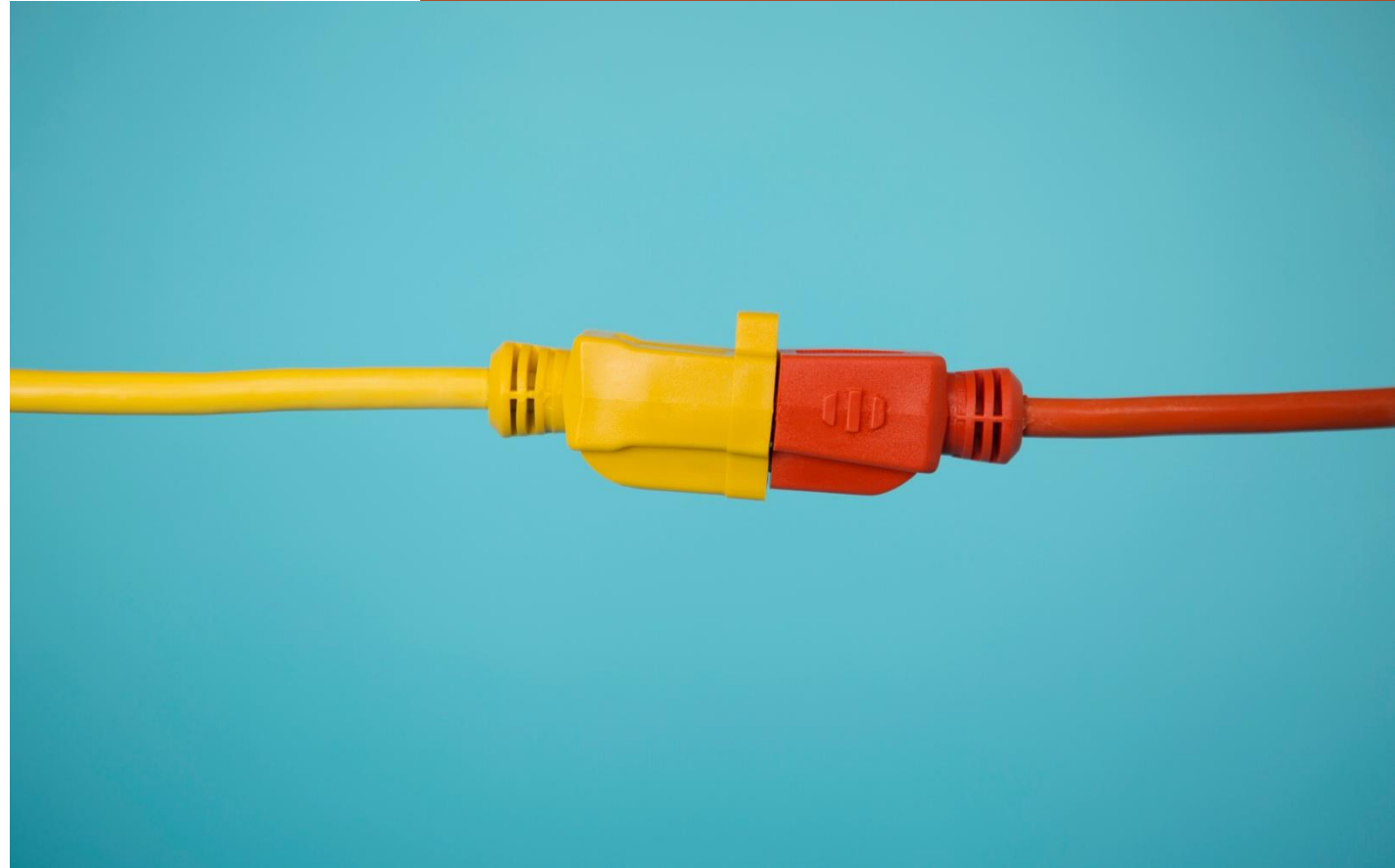
WHAT IF YOU CANNOT GET MORE INFORMATION?

- Written report from unknown complainant
- Reluctant complainant

Pro-Tip

- Determine whether you have enough information as is
- Document your efforts to learn more

**SCENARIO-BASED
PRACTICE:
Identifying a
causal connection**



SCENARIO: *Miranda & Jared*

CAUSAL CONNECTIONS

A chairperson has been complaining to faculty and leadership that a male Asian professor is teaching the course *Black Women's History*.

According to the chairperson, the professor does not have the same connection to the material nor grasp of it that a Black woman would.

ASSESSING FOR CAUSAL CONNECTION: Miranda & Jared

If everything Miranda said is true, is Jared's behavior connected to Miranda being a woman?

Be mindful of assumptions & speculation.

Policies address behaviors, not beliefs.

Best practice necessitates follow up with the Complainant.

Ultimately, there is no causal connection.

This is likely to be a report of unprofessional conduct.

Refer to HR and/or appropriate leadership.

SCENARIO: LEON & THE PROFESSORS

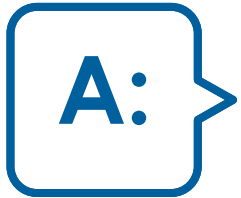
CAUSAL CONNECTIONS

An academic advisor has repeatedly encouraged a pregnant student not to enroll in more classes until after their baby is about a year old because “pregnant students and young mothers are unlikely to be successful in higher education.”

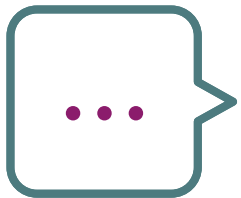
ASSESSING FOR CAUSAL CONNECTION: LEON & THE PROFESSORS



If everything Leon said is true, is the behavior of the professors connected to a protected class?



Yes, because as reported, the “jokes” negatively depict people due to their national origin.



Moving to the next criteria ...

**SCENARIO-BASED
PRACTICE:
Hostile environment
criteria**



ASSESSMENT FRAMEWORK PART 2: HOSTILE ENVIRONMENT CRITERIA

As reported, is the conduct:

- sufficiently severe or pervasive or persistent
- so as to interfere with or limit participation in or benefit from services, activities or privileges?
- as determined by a reasonable person



ASSESSMENT FRAMEWORK: HOSTILE ENVIRONMENT

- Who is a **reasonable person**?
 - Someone in the same protected class as the complainant.
 - Historical and/or cultural context informs severity and impact.
- How do you perform a **neutral assessment regardless** of whether you share the complainant's protected characteristics?
 - Use open-ended questions focused on understanding – *“What does the comment mean to you?”* and/or *“What most concerns you?”*
 - Search online for comments, phrases or other references that are unfamiliar to you.



EXPLORING HOSTILE ENVIRONMENT CRITERIA: LEON & THE PROFESSORS

We've determined a likely causal connection between the professors' "jokes" and national origin.

As reported, is the behavior severe?

SEVERE OR PERVASIVE/PERSISTENT?



**Power
differential &
other context**



History



Duration

REMEMBER ...

Assessment
≠
Finding



If after a causal link has been established, and if a sound argument can be made that alleged conduct may be severe or pervasive, it's best to investigate.

Consider your
resources &
culture



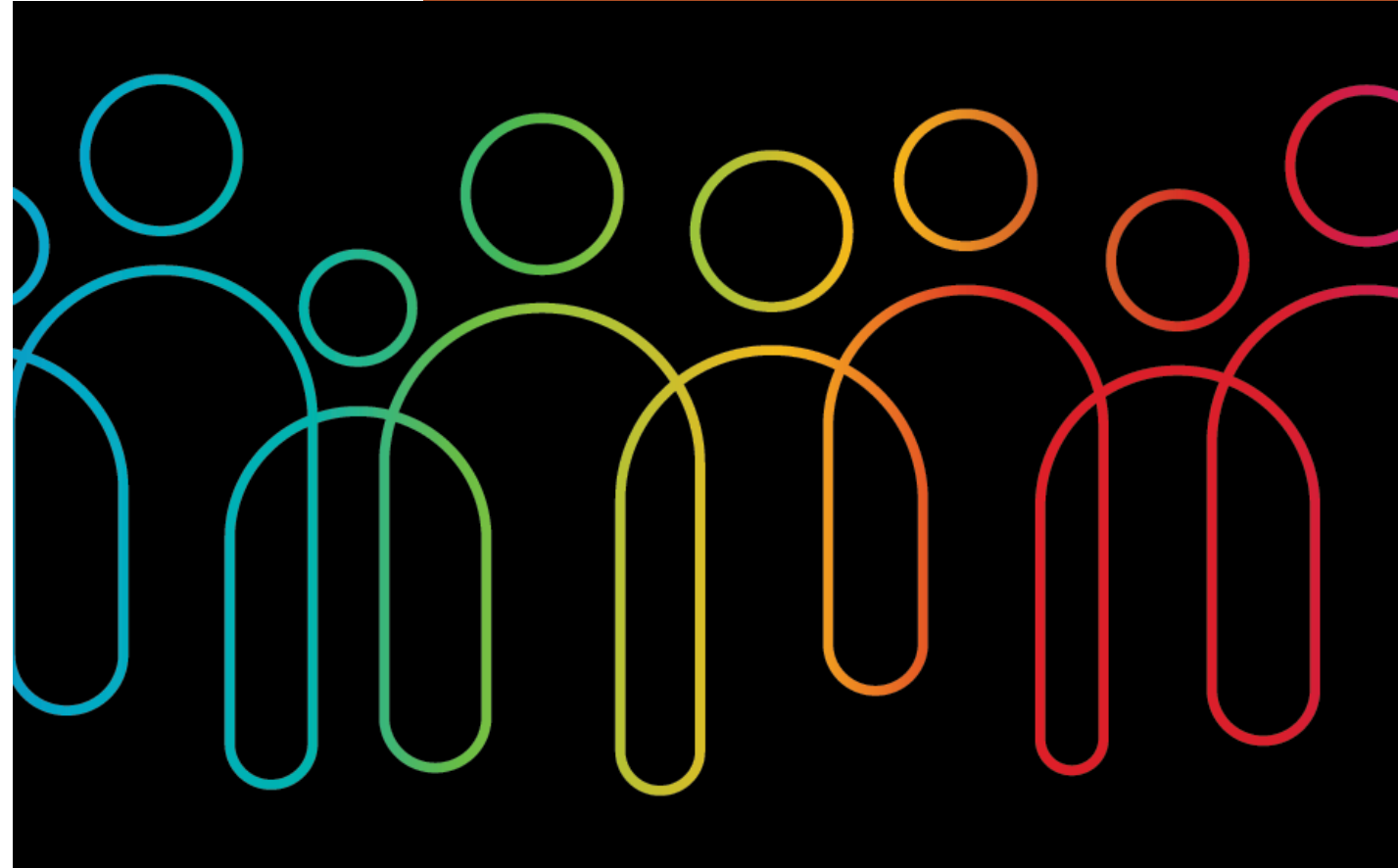
Consider the best way to address this complaint for your institutional environment.

DON'T FORGET

Pro-Tip

- Jurisdiction over context/geography
- Jurisdiction over parties
- Read the policies!

GUIDANCE FOR INITIAL RETALIATION ASSESSMENTS



RETALIATION CLAIMS

Fairly similar across related civil rights regulations

- Technically, can also be a form of additional sex-based harassment
- However, is generally **addressed separately** from the merits of the original complaint of unlawful discrimination
- Must not retaliate against someone for engaging in a **protected activity**.
 - Making a complaint of unlawful discrimination
 - Participating in a resolution process or lawsuit opposing discrimination

Elements:

1. Protected activity
2. Materially adverse action
3. Causal connection

Required process: Prompt and equitable

CAUSAL CONNECTION

- Did the complainant participate in a protected activity?
- When did the protected activity occur?
- Is it possible that the accused person would have known about the protected activity?

- Was it “because of”?
- Is there a neutral policy or process at play? For example, was everyone in a particular department laid off?

RETALIATION UNDER TITLE IX

Retaliation under Title IX includes:

- Trying to avoid giving an accused person their rights & privileges under Title IX
- by addressing non-sexual harassment allegations separately from sexual harassment allegations
- when both types of allegations were part of the same incident(s).

RETALIATION UNDER TITLE IX: AN EXAMPLE



WHEN ASSESSING RETALIATION

- Is it retaliatory, or just mean?
- Getting mad is not necessarily retaliation

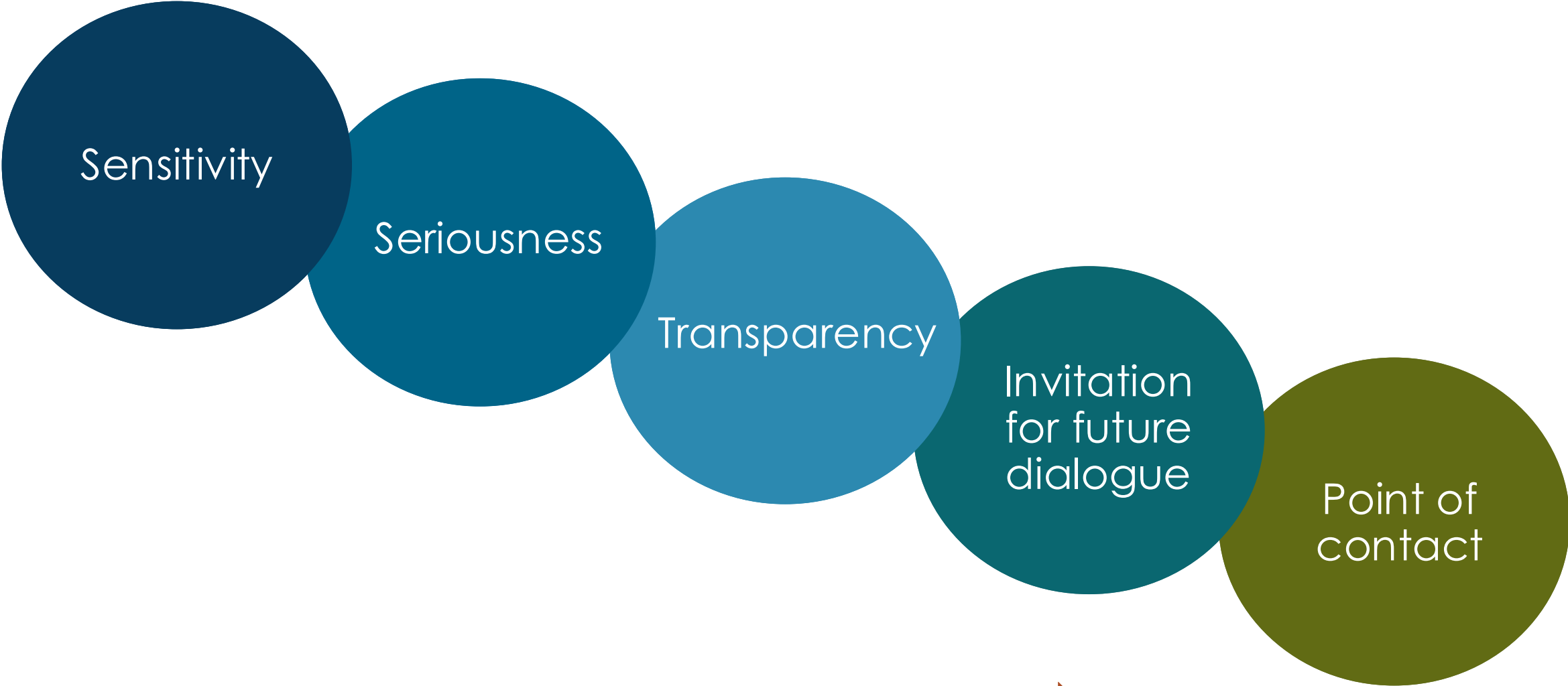
Conversation



**UNPROFESSIONAL
BUT NOT
UNLAWFUL: What
next?**



WHEN YOU NEED TO REFER



IN CONCLUSION ...

These matters can be complex!

Identify if there is a causal connection.

Does it have the potential to meet criteria for a hostile environment?

Use the reasonable person standard to determine if conduct creates a an objectively intimidating, abusive or offensive work environment.



REPORT RESOLUTION

Support-Based Only,
Informal/Alternative, or Formal

HOW TO PROCEED TO RESOLVE?

**Support-
Based Only**

**Alternative/
Informal**

**Formal/
Investigation/
Hearing**

SUPPORT-BASED RESOLUTIONS

- Supportive Measures
- Targeted Education
- Educational Conversations
- **How does this change under Title VI, VII, IX?**



FORMAL COMPLAINT RESOLUTION

Informal Resolution

- Formal Complaint required
- Parties must agree
- Can withdraw from process
- Alternate Resolution/Mediation
- No appeal

Formal Resolution

- Investigation and Adjudication process in compliance with Section 106.45

**CAN PROCEED
UNDER OTHER
POLICY**



DISMISSING OTHER (NON TITLE IX) COMPLAINTS

- What does your policy say?
- This is an area where it makes sense to borrow heavily from Title IX



NOTICE OF ALLEGATION REQUIREMENTS (1)

- Notice of the allegations, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview.
- Sufficient details include:
 - the identities of the parties involved in the incident, if known,
 - the conduct allegedly constituting sexual harassment under §106.30,
 - and the date and location of the alleged incident, if known.
- The written notice must include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process.

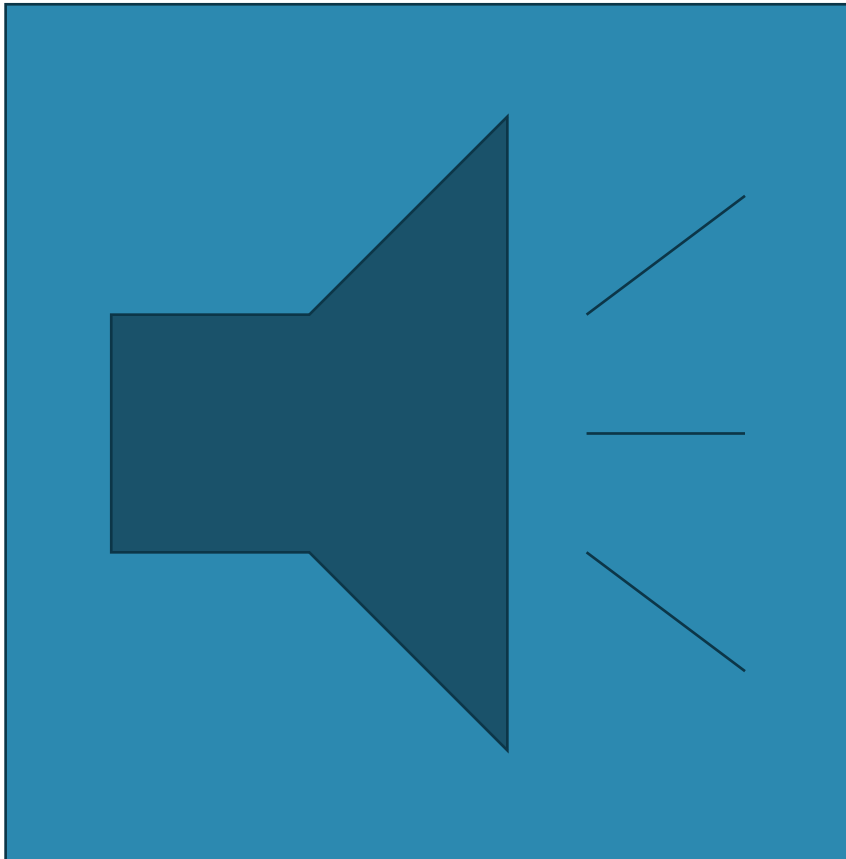
NOTICE OF ALLEGATION REQUIREMENTS (2)

- The written notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, under paragraph (b)(5)(iv) of this section, and may inspect and review evidence under paragraph (b)(5)(vi) of this section.
- The written notice must inform the parties of any provision in the recipient's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process

NOTICE LETTERS IN NON TITLE IX CASES

**What will you borrow
from Title IX?**

NOTIFYING THE RESPONDENT



FIRST- SAFETY

Make sure support is available

Written notification meetings and sufficient time to prepare

Don't send on a Friday

Don't send at 5pm

Notification method

Consider impact of notification on Respondent

ADVISOR OF CHOICE, TITLE IX AND VAWA

The advisor
can be
anyone,
including an
attorney

Institutions
cannot place
restrictions on
who can
serve

No training
required

Institution must
provide advisor
for the purposes
of
questioning only

ALTERNATIVE RESOLUTIONS



ALTERNATIVE RESOLUTION REQUIREMENTS

- Formal Complaint must be filed
- Participation in an alternative resolution must be voluntary
- Must occur prior to resolution via a formal process
- Parties must be permitted to withdraw and seek formal resolution
- Voluntary, written consent to the alternative resolution must be obtained
- Facilitators of alternative resolution must be trained



Informal/alternative resolution is prohibited to resolve allegations that an employee sexually harassed a student.



ALTERNATIVE RESOLUTION TITLE VI CASES

Beware some common concerns:

1. Conduct with wide impact, you may not be able to get all impacted persons to agree to alternative resolution. If others later appear, Respondent likely believes (reasonably) case is fully resolved.
2. When the conduct is driven by outside individuals, not part of your community.

FORMAL RESOLUTION



PROCEDURAL REQUIREMENTS FOR INVESTIGATIONS UNDER TITLE IX

Notice to BOTH parties

Equal Opportunity to
Present Evidence

An advisor of choice

Written notification of
meetings, etc., and
sufficient time to prepare

Opportunity to review all
directly related evidence,
and 10 days to submit a
written response to the
evidence prior to
completion of the report

Report summarizing
relevant evidence and 10-
day review of report prior
to hearing

DIRECTOR/COORDINATOR'S ROLE

In the Investigation

- If Title IX, the Coordinator is permitted to conduct the investigation, though this is not favored
- If conducting the investigation, do so in accordance with the applicable institutional policy
- If not conducting the investigation, should serve as a support to the investigators
- Should serve as a resource to the parties



PROCEDURAL REQUIREMENTS FOR TITLE IX HEARINGS

Must be live, but can be conducted remotely

No Compelling participation

Standard of proof used may be preponderance of the evidence or clear and convincing; standard must be the same for student and employee matters

Cross examination must be permitted and must be conducted by advisor of choice or provided by the institution

Decision maker determines relevancy of questions and evidence offered

Written decision must be issued that includes finding and sanction

TITLE IX COORDINATOR'S ROLE

In the Adjudication

- Title IX Coordinator may not serve as the decision maker
- May serve to support the decision maker(s)
- May participate in the hearing to provide logistical support to decision makers
- Responsible for effective implementation of remedies imposed

TITLE VI COORDINATOR'S ROLE / EO DIRECTOR'S ROLE

In the Adjudication

- May serve as decision maker
- May serve to support the decision maker(s)
- May participate in a hearing to provide logistical support to decision makers
- May be responsible for effective implementation of remedies imposed
- May conduct sanctioning

DON'T FREEZE



Why Appeals
Are a Good Thing

IF TITLE IX

“Institutions must offer both parties an appeal from a determination regarding responsibility, and from a recipient’s dismissal of a formal complaint or any allegations therein.”

If not Title IX, it’s a best practice: Error correction.

DIRECTOR/COORDINATOR'S ROLE

In the Appeal



- If Title IX, the Coordinator may not serve as an appellate reviewer
- May serve to support the appellate reviewer/panel
- May impose or coordinate sanctions, where appropriate.
- May be responsible for effective implementation of remedies imposed



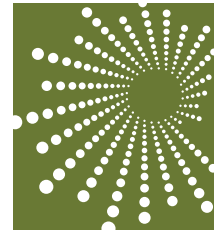
LaNell Shirley Investigation, Hearing, & Appeal Services

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interim or long-term

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