

Title IX Training for Administrators



November 17, 2022

PRESENTED BY:
Anna J. Miller, Senior Counsel



Agenda

- Review Title IX Regulations: Scope and Definitions
- Introduction to Hypothetical & Questions
- Roles of the Title IX Team
- Preliminary Issues
- Title IX Grievance Process
- Retaliation
- Questions



TITLE IX SCOPE AND DEFINITIONS

Federal Law - Title IX:

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.

(Title IX of the Education Amendments of 1972 (20 U.S.C. Section 1681 et seq.) and related regulations (34 C.F.R. Part 106).)

2020 Title IX Regulations

1. Regulations and Guidance

- Effective August 14, 2020, with full force and effect of law **34 CFR Part 106**

2. Overall Intent of Changes

- Strengthen/Clarify Title IX protections for Complainants of sexual misconduct & provide due process protections to Respondents facing accusations of sexual misconduct

3. Scope Under Title IX Regulations

- Amended sexual harassment definitions, clarified jurisdiction, created additional procedures for the investigator, decision-maker & added appeal process

4. K-12 Educational Institutions

- February 2020 OCR Enforcement Initiative to combat sexual assault in K-12 schools

Response to Sexual Harassment

According to **34 CFR § 106.44(a)**: A recipient with **actual knowledge** of sexual harassment in an education program or activity of the recipient against a person in the United States must **respond promptly in a manner that is not deliberately indifferent** (e.g., clearly unreasonable in light of the known circumstances).

Actual Knowledge

- Actual knowledge for **K-12/COE Educational Institutions** occurs when ***any employee*** has notice of sexual harassment or allegations of sexual harassment.
- Best practice to provide annual training to K-12/COE employees about reporting responsibilities to the Title IX Coordinator or other designated Title IX Team Member.

Education Program or Activity

- Per **§ 106.44(a)**: An education program or activity includes locations, events, or circumstances over which the recipient exercised ***substantial control over both the Respondent and the context in which the sexual harassment occurs....***
- At time of filing the formal complaint, the ***Complainant must be participating or attempting to participate*** in recipient's education program or activity.

Sexual Harassment Defined

According to § 106.30, Sexual Harassment means conduct on the ***basis of sex*** under one or more of following:

1. Quid Pro Quo Harassment

- **Employee** conditions the provision of an aid, benefit, or service of the recipient on the Complainant's participation in unwelcome sexual conduct

2. Hostile Environment Sexual Harassment

- Unwelcome conduct determined by a reasonable person to be **so severe, pervasive, and objectively offensive** that it effectively denies Complainant equal access to the recipient's education program or activity

Sexual Harassment Defined, continued

Conduct on the *basis of sex* under one of following:

3. Other Sexual Acts

- **Sexual assault** per 20 U.S.C. 1092(f)(6)(A)(v): Includes Forcible & Nonforcible Sex Offenses
- **Dating violence** per 34 U.S.C. 12291(a)(10)
- **Domestic violence** per 34 U.S.C. 12291(a)(8)
- **Stalking** per 34 U.S.C. 12291(a)(30)

Other Sexual Acts as Sexual Harassment under Title IX

Sexual Assault

–Forcible:

- Any sexual act directed against Complainant, forcibly, against Complainant's will, or without consent, including rape, sodomy, sexual assault with an object, and fondling

–Nonforcible:

- Offenses that do not involve force where the Complainant is incapable of giving consent, including statutory rape and incest

Other Sexual Acts

Dating Violence (34 U.S.C. 12291(a)(10))

- Violence (on the basis of sex) committed by Respondent:
 - who is or has been in a social relationship of a romantic or intimate nature with the Complainant; and
 - where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship
 - (ii) The type of relationship
 - (iii) The frequency of interaction between the persons involved in the relationship

Other Sexual Acts, continued

Domestic Violence (34 U.S.C. 12291(a)(8))

Felony or misdemeanor crimes of violence (on the basis of sex) committed by:

- A current or former spouse or intimate partner of the Complainant
- A person with whom the Complainant shares a child in common
- A person who is cohabitating with or has cohabitated with the Complainant as a spouse or intimate partner
- A person similarly situated to a spouse of the Complainant under the domestic or family violence laws of the jurisdiction receiving grant monies, or
- Any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Other Sexual Acts, continued

Stalking (34 U.S.C. 12291(a)(30))

The term “stalking” means engaging in a course of conduct (on the basis of sex) directed at Complainant that would cause a reasonable person to:

- **Fear** for their safety or the safety of others; or
- Suffer substantial **emotional distress**

Hypothetical

On or about Friday, August 21, 2020, Respondent tutored Complainant on campus in the library immediately after school. Respondent put a hand on Complainant's knee, made comments about sexual acts (e.g., "smashing") and then touched Complainant's groin area. When Complainant moved away, Respondent moved towards Complainant. Complainant immediately left the library.

Complainant's parent reported the matter to the Principal by calling the school office at 7:30 a.m. on Monday, August 24th.

Questions for Principals & Site Administrators

- 1. Who will meet with the Complainant's parent?**
- 2. Who will have initial meeting with Complainant at the school?**
- 3. How do you keep Complainant & Respondent on campus but prevent harassment during investigation?**
- 4. When do you report the matter to law enforcement?**
- 6. How do you handle concurrent law enforcement investigation?**
- 7. How do you handle criminal or civil restraining orders against students or employees on campus?**
- 8. Who recommends student or employee sanctions after the decision?**

ROLES OF THE TITLE IX TEAM

Who's on the Title IX Team?

1. Title IX Coordinator, per § 106.8(a)
2. Investigator(s)
3. Decision-Maker(s)
4. Appeal Officer Decision-Maker(s)
5. Informal Resolution Process Facilitator(s)

All Title IX team members must be trained, impartial, unbiased, and free from conflicts.

Title IX Team: Title IX Coordinator

Title IX Coordinator Duties:



- Coordinates Title IX compliance and training
- Likely conducts intake meeting with Complainant
- Offers supportive measures to Complainant & Respondent
- Explains grievance process, accepts formal complaint & determines mandatory dismissal
- Evaluates emergency removal with team
- Evaluates use of informal resolution process
- Assigns unbiased investigator free from conflicts
- Sends notices (e.g., Notice of Allegations)
- Considers permissive dismissal of complaint

Title IX Team: Title IX Coordinator

Title IX Coordinator duties, continued:

- Reviews investigative reports, written decision & appeal decision but **does not make decision** about responsibility
- Drafts letter of outcome after written decision issued
- *Likely does not* determine sanctions, but if sanctions are applicable, Title IX Coordinator ensures **effective** implementation of remedies for Complainant, sanctions for Respondent, and overall corrective plan
- *May* investigate when needed
- *May* act as facilitator of an informal resolution process
- **Query:** Can a school site have a Deputy Title IX Coordinator?

Title IX Team: Investigator(s)

Investigator Role:



- Trained, knowledgeable, impartial, unbiased & free from general or specific conflicts of interest
- Investigates formal complaint
 - Reviews complaint and Notice of Allegations
 - Gathers, reviews, weighs, and synthesizes evidence
 - Interviews parties and witnesses
 - Assesses relevance and likely weight of the evidence
- Coordinates two review processes & assesses party responses
- Prepares written investigative report & compiles evidence
- Investigator does **not** make a decision about whether Respondent is “responsible” for violation of sexual harassment policy

Title IX Team: Decision-Maker

Decision-Maker Role:



- Reviews Final Investigative Report with “fresh eyes” to see if information is missing or incomplete
- Facilitates relevant written questions and “cross-examination” from parties for parties and witnesses
- Makes conclusions about whether alleged conduct occurred and determines responsibility
- Prepares written determination with findings of fact, policy conclusions, and rationale for the result as to each allegation
- If applicable, recommends sanctions for Respondent and remedies for Complainant
- Provides written determination and appeal rights to the parties and advisors simultaneously

Title IX Team: Appeals Officer


Appeal Officer Role:



- Knowledgeable of both parties' right to appeal based on three grounds for appeal
- If an appeal is filed, the Appeal Officer evaluates the appeal request(s) to determine if within the scope of appeal
- Provides a written Notice of Appeal to both parties
- Reviews both written statements and arguments from the parties
- Renders written decision on appeal and explains rationale for the result
- Provides the written decision to parties at same time

Title IX Team: Informal Resolution Process Facilitator

Informal Resolution Process Facilitator Role:



- Cannot require the parties to participate in informal process or to waive the right to an investigation
- Obtains voluntary written consent of the parties to resolve the matter anytime before a determination of responsibility is made
- Process does not involve full investigation or adjudication but includes a written notice to the parties disclosing the allegations, the requirements of the process, and notice that the parties can withdraw and resume the grievance process
- May consider the use of a trained mediator or trained restorative justice facilitator, if requested and appropriate
- Process cannot be used where an employee is alleged to have sexually harassed a student

PRELIMINARY ISSUES INVOLVING REPORTS OF SEXUAL HARASSMENT

Supportive Measures

1. Requirement to Offer Supportive Measures per § 106.30 & § 106.44

- Must be offered to Complainant as soon as District has notice of possible Title IX issue and to Respondent after complaint filed

2. Avoid Burden on Parties

- Supportive Measures must be non-punitive, non-disciplinary, and not unreasonably burdensome to the other party

3. Individualized

- Supportive Measures must ensure equal educational access, protect safety, and/or deter sexual harassment; notify appropriate employees at school site; document

4. Examples of Supportive Measures

- Counseling, course-related adjustments, modify schedule, extend deadlines, campus escort, increased security and monitoring, and/or mutual restrictions on contact between the parties

Discuss Advisor of Choice

- Under **§ 106.45(b)(5)(iv)**, the Title IX regulations provide the Complainant and Respondent with the same opportunities to have “others present” during any grievance proceeding
 - An advisor may be a parent, family member, attorney, or other person
 - The advisor may be present with the person they are advising for any meeting, interview, or hearing, and for the inspection and review of the evidence obtained as part of the investigation
 - The advisor may assist with a written cross-examination process
 - The institution may establish restrictions on the extent of an advisor’s participation, if restrictions apply equally to both parties

Emergency Removal Option for Students

1. Institution may remove Respondent per § 106.44(c) by undertaking an individualized safety & risk analysis of Respondent:
 - The analysis determines if there is an *immediate threat to the physical health or safety* of any student or other individual arising from the allegations to justify removal
2. Notice to Respondent of Emergency Removal and opportunity to challenge decision immediately following the removal
3. Process **cannot** modify Respondent rights under IDEA, Section 504, or ADA
4. Emergency removal under Title IX is a safety measure; suspension under Educ. Code 48900 et seq is a disciplinary measure
5. Provide education to Respondent while removed

Administrative Leave Option

1. Institution may place a non-student employee Respondent on administrative leave per § 106.44(d) during the pendency of a grievance process that complies with § 106.45
2. This administrative leave option cannot be construed to modify any rights under Section 504 or the Americans with Disabilities Act.

TITLE IX GRIEVANCE PROCESS

Grievance Process

1. Basic Requirements
2. Notice of Allegations
3. Dismissal of Formal Complaint
4. Consolidation
5. Investigation
6. Written Questions By Parties
7. Determination of Responsibility
8. Appeals
9. Informal Resolution
10. Recordkeeping

See 34 CFR § 106.45(b)

Basic Requirements

1. Per § 106.45(b)(1)(i), treat Complainant and Respondent equitably in the grievance process and related to remedies and sanctions, if any
2. Require objective evaluation of all relevant evidence, including inculpatory and exculpatory evidence
3. Cannot make credibility decisions based on a person's status as Complainant, Respondent, or witness
4. Presume that Respondent is not responsible until a determination is made
5. Follow prompt time frames (estimate 45-90 days)
6. State a standard of evidence (preponderance or clear and convincing). Most K-12 entities use preponderance of evidence

Notice of Allegations

- **Notice of allegations with sufficient details to both parties:**
 - Identification of the parties by name
 - Description of alleged conduct constituting sexual harassment and the date and location of alleged incident
 - If additional allegations are discovered, provide written Notice of *Additional Allegations*
- **Notice of the institution's grievance process and informal resolution process**
 - Identification of relevant Board Policies & Administrative Regulations which contain the grievance process and informal resolution process
 - Identification of preponderance of the evidence standard
 - Right to inspect and review evidence

Notice of Allegations, continued

- **Notice of Allegations to Each Party, continued**

- Identification of potential policy violations (not just Title IX)
- Identification of the range of possible disciplinary sanctions and remedies
- Statement that Respondent is presumed not responsible
- Notification that a determination of responsibility will be made at the conclusion of the grievance process
- Notification that each party may have an advisor of choice, who may be an attorney
- Prohibition against parties knowingly making false statements or knowingly submitting false information; advice against tampering with evidence
- Discuss confidentiality and retaliation

Dismissal of Formal Complaint

- **Required Dismissal per § 106.45(b)(3)**
 - Recipient **must** dismiss the formal complaint *if* the conduct alleged:
 - Would not constitute sexual harassment as defined in § 106.30 even if proved
 - Did not occur in the recipient's education program or activity
 - Did not occur against a person in the United States
 - Such dismissal by the Title IX Coordinator does **not** preclude action under another provision of recipient's Code of Conduct, Board Policy/Administrative Regulation, or California law

Dismissal of Formal Complaint, continued

- **Permissive Dismissal per § 106.45(b)(3)**
 - Recipient **may** dismiss the formal complaint or allegations any time during the investigation or hearing *if*:
 - The Complainant notifies the Title IX Coordinator in writing to withdraw the complaint
 - The Respondent is no longer enrolled or employed
 - Special circumstances prevent the recipient from gathering evidence in order to reach a determination
- **All dismissals require written notice & reasons delivered to the parties at the same time**

Consolidation of Formal Complaints

- **A recipient may consolidate formal complaints as to allegations of sexual harassment where the allegations arise out of the same facts or circumstances**
 - Against more than one Respondent;
 - By more than one Complainant against one or more Respondents; or
 - By one party against the other party (cross-claims)

Investigation

1. Presumption

- The institution must presume Respondent is *not responsible* for the alleged conduct

2. Evidence Gathering

- Investigator for the educational institution has the burden to gather sufficient evidence; the burden to gather evidence is not on the Complainant or Respondent
- Investigator cannot gather privileged information without voluntary, written consent (e.g., physician or psychiatrist records, etc.)

3. Written Notice with Time to Prepare

- Provide written notice for all interviews with sufficient time for the party to prepare to participate

Investigation, continued

4. Equal Opportunity for Parties

- To present witnesses, including fact & expert witnesses and other inculpatory and exculpatory evidence
- To have an advisor present for any meeting, interview, or hearing

5. No “Gag” Orders or Directives

- Cannot restrict the ability of the Complainant or Respondent to discuss the allegations under investigation or to gather and present relevant evidence
- Likely can direct parties and witnesses not to tamper with evidence

Investigation, continued

6. Equal Opportunity to Inspect and Review Evidence

- Provide parties with opportunity to meaningfully respond to the evidence *before* the conclusion of the investigation.
- Parties may review evidence that is directly related to the allegations, including evidence which the investigator does *not* intend to rely upon as well as inculpatory and exculpatory evidence regardless of where it was obtained

Investigation, continued

7. Prepare and Share Draft Report of Evidence

- Before completing the Investigative Report, provide a ***Draft Report of Evidence and Attachments*** to both parties and their advisor, if any, via electronic format or a hard copy.
- Provide the parties and advisors, if any, with at least 10 days to review the Draft Report of Evidence and Attachments & submit written responses
- Share any new evidence with the parties and continue the investigation related to new information, if needed
- Consider and incorporate new information and responses in the ***Final Investigative Report***

Investigation, continued

8. Investigator Prepares Final Investigative Report

- Fairly summarize relevant evidence
- Relevant evidence may include credibility assessments

9. Provide Investigative Report to Parties

- At least 10 days prior to a hearing or other time of determination regarding responsibility, send the investigative report to each party and the party's advisor, if any, in an electronic format or a hard copy for their review and written response
- Review written response, revise if needed, and attach written response to the Investigative Report

Written Questions By Parties

Before making a decision, the Decision-Maker will facilitate a process to afford each party the opportunity to submit written, relevant questions:

1. Written Questions (e.g., Written Cross Examination)

- After the investigator has provided the Final Investigative Report to the parties and **before** the Decision-Maker has reached a determination regarding responsibility, the Decision-Maker must afford ***each party the opportunity to submit written relevant questions that a party wants asked of any party or witness***, provide each party with the answers, and allow for additional, limited follow-up questions from each party.

Written Questions By Parties, continued

2. Exclusion of Irrelevant Questions

– General Definition of Irrelevant

- Not important, pertinent, or germane to the matter or issues raised in the investigation

– Prior Sexual Behavior

- Questions and evidence about Complainant's sexual predisposition or prior sexual behavior are *irrelevant*, unless such questions and evidence are offered to prove:
 - Someone other than Respondent committed conduct alleged by Complainant, or
 - Prior sexual behavior with Respondent offered to show consent between the parties

– Decision-Maker must explain why excluded a question to the party posing the question

Determination of Responsibility

1. Decision-Maker Determines Responsibility per § 106.45(b)(7):

- Decision-maker must be trained to rule on relevance of questions and how to assist with rephrasing the questions to be relevant
- Must understand how to apply the “preponderance of the evidence” standard to weigh the evidence
- **Reminder:** The Title IX Coordinator or investigator cannot determine responsibility

2. Written Determination or Decision

- The written determination must include the following:
 - Identification of the allegations potentially constituting sexual harassment under Title IX (or other policies if alleged)
 - A description of the procedural steps taken from receipt of complaint through determination, including notices, interviews, site visits, evidence gathering, etc.

Determination of Responsibility, continued

2. Written Determination or Decision, continued

- Findings of fact supporting the determination
- Conclusions regarding the application of the District's policies to the facts
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility
- If the Decision-Maker finds responsibility, the written decision should include recommendations for disciplinary sanctions for Respondent and the provision of remedies for Complainant designed to restore or preserve equal access to the District's education program
- How to file an appeal and the permissible bases for an appeal

3. Written decision delivered to Complainant & Respondent simultaneously

Appeals

1. Equal Opportunity for Appeal under § 106.45(b)(8)

- Both parties must have opportunity to appeal
 - the determination of responsibility, or
 - the dismissal of a formal complaint or allegations

2. Bases for Appeal

- Procedural irregularity that affected the outcome;
- New evidence that was not reasonably available & could have affected outcome; or
- Conflict of interest or bias generally or specifically by Title IX Coordinator, investigator, and/or decision-maker that affected the outcome

Note: Institution may include other bases for appeal if both parties have equal right to use

Informal Resolution Process

1. Optional Process per § 106.45(b)(9)

- May use informal resolution process on a case-by-case basis after formal complaint is filed

2. Informed, Mutual Consent

- Both parties must give voluntary, informed, and written consent but cannot be required as a condition of enrollment/employment

3. Right to Withdraw from Informal Process

- Either party can withdraw from informal process at any time and resume formal process

4. Not Suitable for Student vs. Employee Matters

- No informal process for allegations that an *employee* harassed a student

Recordkeeping

1. A recipient must maintain records for 7 years, including records of:

– Each sexual harassment investigation, including:

- Determination regarding responsibility
- Audio or audiovisual recording or transcript, if any, for K-12
- Any disciplinary sanctions imposed on Respondent, if applicable
- Any remedies provided to Complainant, if applicable

Recordkeeping, continued

2. A recipient must maintain records for 7 years, including records of:

- Any appeal and the result of the appeal
- Any informal resolution and the result of the informal process
- All materials used to train Title IX Coordinators, investigators, decision-makers, appeal officers, and any person who facilitates an informal resolution process
 - These training materials must be publicly available on the institution's website
 - If no website, training materials must be available upon request for inspection by the public

Recordkeeping, continued

3. For each response required under § 106.44, a recipient must create and maintain records for 7 years, including records of:

- Any actions, including supportive measures, taken in response to a report or formal complaint of sexual harassment
 - If the recipient did not provide supportive measures, it must document why that decision was not clearly unreasonable in light of the known circumstances
- In each instance, recipient must document
 - Why its response was not deliberately indifferent
 - The measures taken which were designed to restore or preserve equal access to the education program or activity

RETALIATION

Retaliation

1. Section 106.71(a) – Retaliation Prohibited

- No recipient or other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in an investigation, proceeding, or hearing.

2. Avoiding the Title IX Process May Be Retaliation

- If the alleged behavior falls under Section 106.30 definitions, a recipient cannot use the student conduct process as a way to avoid the rigorous Title IX grievance procedures; such a decision may constitute retaliation.

3. Retaliation Complaints Filed Under Same Process

- Retaliation complaints must be filed under the Section 106.8 grievance process.

Retaliation, continued

4. Confidentiality Required by Recipient

- Recipient must keep identity of Complainant, Respondent, and witness(es) confidential unless required by law “or as necessary to carry out Title IX proceeding”
- Regulations imply that the improper release of this confidential information could be retaliation

5. First Amendment Rights

- Parties exercising their 1st Amendment rights does not constitute retaliation under Section 106.71(a)

6. False Statement Charge

- Recipient charging an individual with making a false statement in bad faith during Title IX process is **not** retaliation
- A responsibility determination (or no responsibility determination) is not sufficient evidence to conclude there was a bad faith false statement

CHECK FOR UNDERSTANDING

Hypotheticals 1-3

- 1. Student A offers to name Student B the Vice President of the Chess Club if Student B kisses Student A.**
 - Is this sexual harassment under Title IX, State law, Board Policy or something else?
- 2. Student A enters your office and tells you that another student touched Student A's buttocks, which made Student A uncomfortable.**
 - What do you need to know?
 - What should you do?
- 3. Student A enters your office and tells you that a teacher touched Student A's buttocks in the classroom and made a kissing sound, which scared Student A.**
 - What do you need to know?
 - What should you do?

Hypothetical 1 - Discussion

1. Complaint: Student A offers to name Student B the Vice President of the Chess Club if Student B kisses Student A.

– Is this sexual harassment under Title IX?

- This will **not** qualify as “quid pro quo” harassment under Title IX because the condition must be offered by **an employee**.
- However, this **might** be evidence of hostile environment sexual harassment under Title IX and warrants more questions to determine if there was additional sex-based behavior from Student A towards Student B.
- Even if this action does not rise to the level of Title IX’s definition of sexual harassment, this action may be a violation of the institution’s Board Policy/Administrative Regulations prohibiting sexual harassment under California law.
- Talk to Title IX Coordinator about next steps

Hypothetical 2 - Discussion

2. **Student A enters your office and tells you that Student B touched Student A's buttocks, which made Student A uncomfortable.**

– What do you need to know?

- Where did it happen? Is it on campus or in a location where District exercised substantial control over Student B/Respondent and the context in which the sexual harassment occurred?
- Was the conduct based on sex? What's the nature of the touch? On an intimate body part?
- Was the conduct welcome or against Student A's will?

– What should you do?

- Contact Title IX Coordinator as this may be sexual harassment or other sexual acts under Title IX, and likely contact parents
- Offer Supportive Measures with or without a formal complaint
- Work with Title IX Coordinator to determine if this is a Title IX matter, a Uniform Complaint matter, or a student conduct matter
- If a Title IX complaint is filed, District and site determine who investigates and who is decision-maker

Hypothetical 3 - Discussion

3. **Student A enters your office and tells you that a teacher touched Student A's buttocks in the classroom and made a kissing sound, which scared Student A.**

– What do you need to know?

- Gather additional information as soon as possible about whether the teacher's actions were based on sex or of a sexual nature and how it made the student feel

– What should you do?

- Contact Title IX Coordinator as this may be sexual harassment or other sexual acts under Title IX and state laws
- Contact parents
- Consider filing CPS/CWS report or contact local law enforcement
- Work with Title IX Coordinator to initiate intake meeting, an investigation, and complaint process, but it is ok to delay for a reasonable time if law enforcement must gather evidence from parties before you begin District investigation
- Consider Paid Administrative Leave for teacher

Question & Answer
Session

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Thank You

For questions or comments, please contact:

{ Anna J. Miller
(916) 923-1200
AMiller@aalrr.com }

aalrr

Atkinson, Andelson
Loya, Ruud & Romo

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