

# K12 TITLE IX INVESTIGATOR TRAINING





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11/13/24 Title IX Investigator Training

11/20/24 Title IX Decisionmaker/Appeal Officer Training



# Overview of Title IX Investigator Training

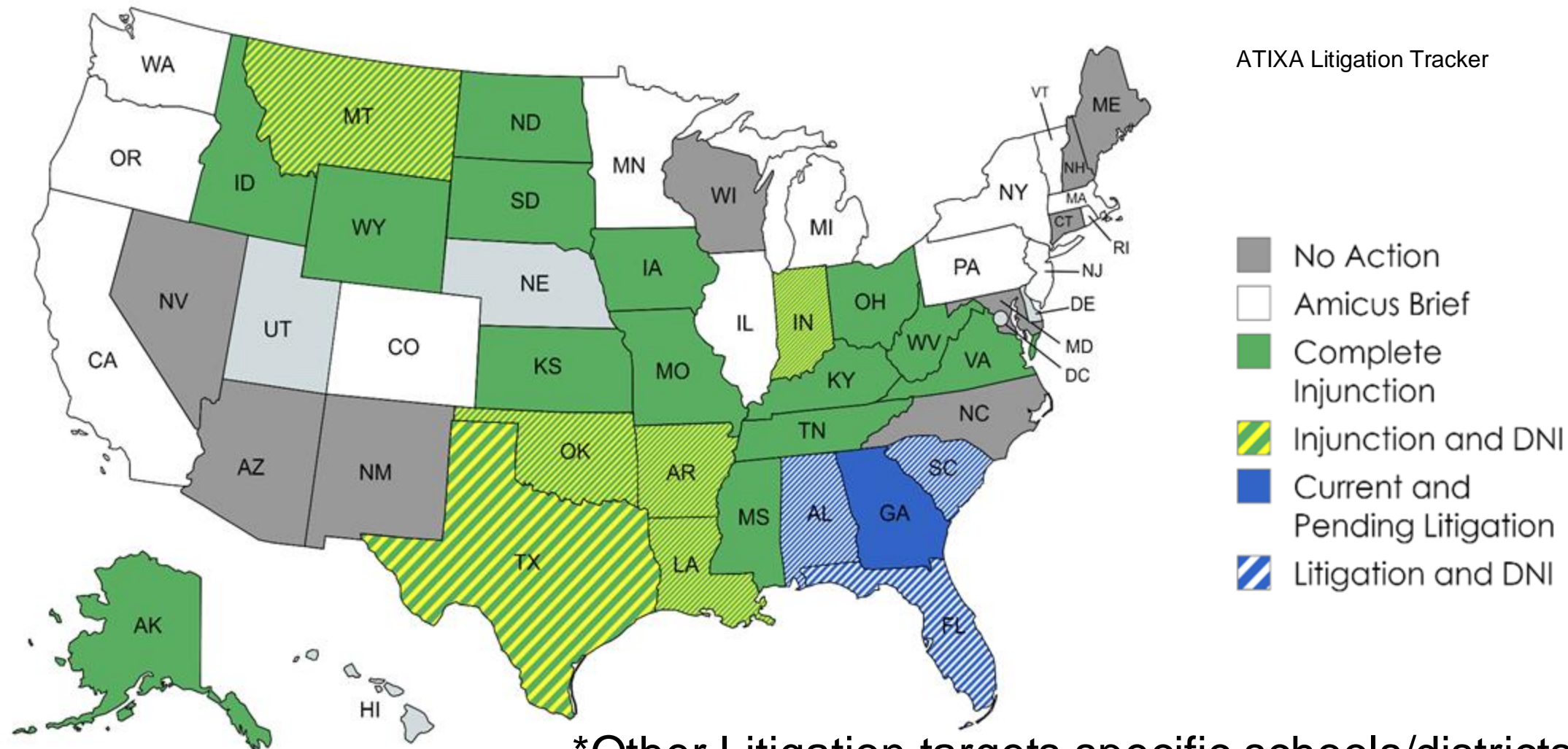


- Title IX – Law and Regulations
- Title IX – Covered Acts and Definitions
- Title IX Grievance Procedure – Title IX Investigator Lens
- Title IX Investigator Other Considerations



# Preliminary Issues

# Litigation Limiting Enforcement of 2024 Regulations



\*Other Litigation targets specific schools/districts



- 2024 election results will return Trump to office in January 2025
- Prior Trump administration authored the 2020 Title IX Regulations that were superseded by the 2024 regulations
- Expected return to the 2020 regulations
- Unclear when or how this will be done



# Legal Framework of Title IX

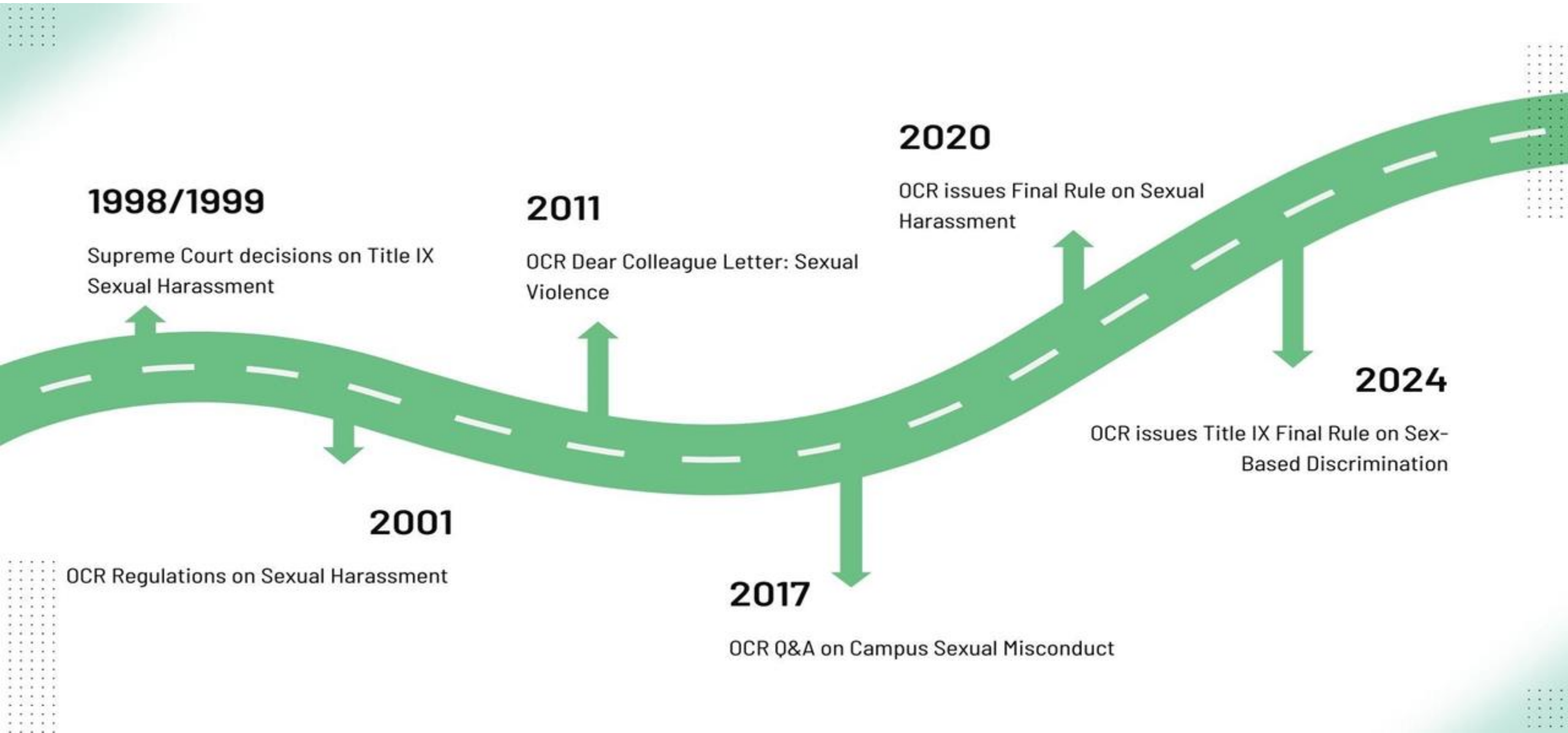




“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”

- Federal law passed in 1972
- Enforced through the Department of Education, Office for Civil Rights (OCR)

# Title IX Regulations Timeline



**1998/1999**

Supreme Court decisions on Title IX Sexual Harassment

**2011**

OCR Dear Colleague Letter: Sexual Violence

**2020**

OCR issues Final Rule on Sexual Harassment

**2001**

OCR Regulations on Sexual Harassment

**2017**

OCR Q&A on Campus Sexual Misconduct

**2024**

OCR issues Title IX Final Rule on Sex-Based Discrimination



# K12 School Districts' Obligation to Prevent Sex Discrimination



## **Parties**

- Complainant – alleged victim/survivor
- Respondent – responds to the allegation(s)

## **Other Participants**

- Fact Witnesses
- Expert Witnesses

## **Administration of Claims**

- Title IX Coordinator
- Title IX Investigator
- Title IX Decision-Maker
- Title IX Appeal Officer
- Title IX Advisor
- Title IX Informal Resolution Officer

# 2024 Regulations Preliminary Definitions



## Complainant

- 1) student or employee who has been subject to conduct that could be sex-based discrimination; under Title IX
- 2) **person other than a student or employee** who is alleged to have been subject to sex-based discrimination and who was participating in the school's education program or activity at the time of the alleged discrimination.

## Respondent

person who is alleged to have violated the school's prohibition on sex discrimination.

## Complaint

an **oral or written request** to school that can objectively be understood as a request for the school to investigate and make a determination about alleged sex-based discrimination.

## Parents/Guardians

permitted to make decisions for minor students related to filing a complaint, accompanying students to interview/hearings/meetings, investigation process, and accessing records.

- Advisors – Parents/guardians can serve in this capacity; policy will define if others can act as advisors to parties in Title IX matter.



## 2020 Regulations Legal Obligation

Educational institutions must respond in a manner that is not **deliberately indifferent** when it has actual knowledge of sexual harassment occurring in the institution's education program or activity against a person in the United States.



## 2024 LEGAL OBLIGATION

K12 school districts have an obligation to take **prompt and effective action** to end any sex discrimination in their educational programs or activities, to **prevent** its recurrence, and to **remedy** its effects.

# 2020 Regulations – Actual Knowledge of Sexual Harassment



- When sexual harassment or allegations of sexual harassment come to the attention of **ANY EMPLOYEE** of a K-12 district:
  - All employees **MUST** report to the **TITLE IX COORDINATOR**
- Failure to report could lead to an inadequate response
  - Proof of deliberate indifference
  - Legal responsibility for sexual harassment





## 2024 Regulations - NOTICE and REQUIRED RESPONSE

In relation to sex discrimination and/or sex-based harassment, the school must **respond to information about conduct that reasonably may constitute sex discrimination**, including sexual violence and other forms of sex-based harassment.

# Reporting Obligations of K12 Employees



## Non-Confidential Employees

All employees, except Confidential Employees, have an obligation to report to Title IX Coordinator upon notice about conduct that reasonably may constitute sex discrimination under Title IX.

## Confidential Employees

Designated as Confidential  
**Mental Health Prog**

No Duty to Report

**must share with potential Complainants:**

- 1) they are confidential and not required to report to Title IX Coordinator;
- 2) how to contact Title IX Coordinator;
- 3) how to file a complaint;
- 4) Title IX Coordinator may be able to provide supportive measures, initiate an informal resolution, and/or start an investigation.

# 2024 Regulations – Pregnancy and Related Conditions



**Purpose:** To prevent sex discrimination and ensure equal access to its education program or activity.

**Response:** To take steps to provide **reasonable modifications** for students, reasonable break time for lactation, and lactation space for students and employees.

**Documentation:** Prohibited from requiring documentation from students to obtain reasonable modifications unless documentation is necessary and reasonable.

Upon notification of pregnancy from student, employee must provide student with Title IX Coordinator contact information when they receive notice from student of pregnancy or related condition.



For Title IX to apply, the behavior must occur in the school’s “education program or activity,” further defined as:

*locations, events, or circumstances over which the recipient exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and also includes any building owned or controlled by a student organization that is officially recognized by a postsecondary institution.*

Off-campus activities covered if one (1) of three (3) requirements are met:

1. the off-campus incident occurs as part of the school’s operations;
2. the school exercised substantial control over the respondent and the context of alleged sexual harassment that occurred; or
3. the incident of sexual harassment occurs at an off-campus building owned or controlled by a student organization officially recognized by a college

# 2024 Regulations - Jurisdiction



Conduct that occurs under a District's education program or activity in the United States and includes conduct that is subject to the District's disciplinary authority.

## Includes

- Conduct that occurs in a building owned or controlled by a student organization that is officially recognized by the school.
- Conduct that is subject to the school's disciplinary authority.

## Expansion of Jurisdiction

- ① Sex-based hostile environment allegations even if some of the alleged conduct took place outside the District's education program or activity and/or outside of the United States.
- ② Definition of Complainant also includes a party who is no longer participating in or attempting to participate in the District's education program or activity.

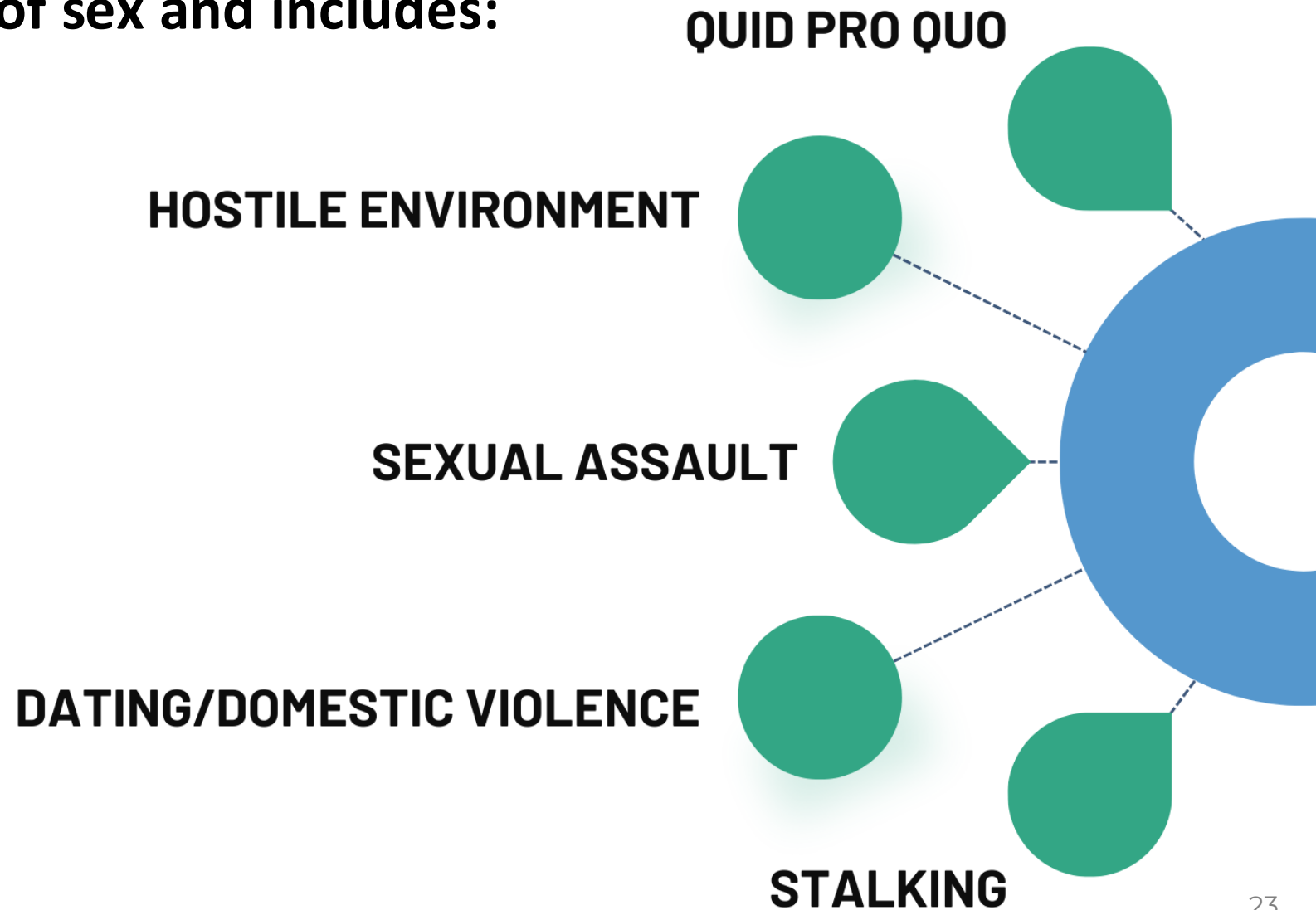


# Title IX Definitions

# 2020 Regulations: Title IX Definition of Sexual Harassment



**Defined conduct on the basis of sex and includes:**



# 2024 Regulations:

## Sex Discrimination and Sex-Based Harassment



K12 school districts have an obligation to take prompt and effective action to end any sex discrimination in their educational programs or activities, to prevent its recurrence, and to remedy its effects. This includes:

- **Sex Discrimination:**

- Sex Stereotypes

- Sex Characteristics

- Sexual Orientation

- Gender Identity

- Pregnancy & Related Conditions

- **Sex-Based Harassment:**

- Quid Pro Quo

- Hostile Environment

- Sexual Assault

- Dating/Domestic Violence

- Stalking



# Sex Discrimination Definition (2024)



- When an individual is treated differently based on sex, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity and is treated differently based on sex in:
  - Education programs
  - Activities
- Discrimination based on sex in a program:
  - Systematic, due to policy or practice
  - Programmatic discrimination adversely affects persons as a group
  - Programmatic discrimination is usually attributed to the district not to an individual respondent

# Sex-Based Harassment Definition (2020 and 2024)



Sex-based harassment is a form of sex discrimination and refers to sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

- Quid pro quo
- Hostile Environment
- Specific Offenses: sexual assault, dating/domestic violence and stalking

# ● Quid Pro Quo Harassment

“An employee, agent, or other person authorized by the school to provide an aid, benefit, or service under the school’s education program or activity explicitly or impliedly conditioning the provision of such an aid, benefit, or service on a person’s participation in unwelcome sexual conduct.”

- \* Contemplates the possibility that a student could be found responsible for quid pro quo harassment under certain circumstances.



# Hostile Environment Harassment

“Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person’s ability to participate in or benefit from the school’s education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

- The degree to which the conduct affected the complainant’s ability to access the school’s education program or activity;
- The type, frequency, and duration of the conduct;
- The parties’ ages, roles within the school’s education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
- The location of the conduct and the context in which the conduct occurred; and
- Other sex-based harassment in the school’s education program or activity.”

# Specific Offenses: Sexual Assault, Dating/Domestic Violence and Stalking

**Sexual assault** meaning an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the FBI.

## **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.

## **Non-Forcible:**

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



# Dating/Domestic Violence

**Dating violence** meaning violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship;
  - The type of relationship; and
  - The frequency of interaction between the persons involved in the relationship.

**Domestic violence** meaning felony or misdemeanor crimes committed by a person who:

- (1) Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the school, or a person similarly situated to a spouse of the victim;
- (2) Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- (3) Shares a child in common with the victim; or
- (4) Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.



# Stalking

Stalking meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

(1) Fear for the person's safety or the safety of others; or

(2) Suffer substantial emotional distress.



# Pregnancy and Related Conditions

Pregnant students (or person who has a legal right to act on behalf of the student) must be promptly informed of the Title IX Coordinator's contact information and informed that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to the school's education program or activity.  
Reasonable modifications must be permitted.  
"Related conditions" are expansive.



# Complying with Pregnancy Provisions



## Students

- Must NOT discriminate against any student on the basis of the student's current, potential, or past pregnancy or related conditions
- Provide information about school's obligations
- Provide reasonable "modifications"
- Voluntary access to separate and comparable program/activity
- Voluntary leave of absence
- Lactation space
- Comparable to other medical conditions

## Employees

- MUST treat pregnancy or related conditions as any other temporary medical conditions for ALL job-related purposes
  - Leave
  - Disability
  - Other Benefits
- Lactation spaces
- Pre-employment questions



Retaliation meaning intimidation, threats, coercion, or discrimination against any person by the school, a student, or an employee or other person authorized by the school to provide aid, benefit, or service under the school's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

- New regulations explicitly include a prohibition against **peer retaliation**
- Schools can require employees to participate in investigations as witness – does not constitute retaliation
- Schools may NOT require students to participate in investigation for either student parties and/or witnesses
- Retaliation allegations follow the Title IX Grievance Procedures

# Important Terms Not Defined by Regulations



- Consent
- Peer Retaliation  
Example provided



# Grievance Procedure/Required Response – Title IX Investigator Lens 2020 and 2024 Regulations



- Policy will define expectations for the Investigator
- Seek clarity about role
  - Investigator OR Investigator-Decisionmaker – ONLY 2024
  - Investigator CANNOT be Decision-maker - 2020
  - Information that will be shared – 2024
    - Full file OR list of evidence
    - Managed by TIXC or Investigator
- Gather relevant evidence
- Create and maintain the investigation record
- Develop and revisit your investigation strategy
- Collect the investigatory information into the proper format
  - Report OR something else?



# Notice of Complaint of Discrimination

**2020:** Educational institutions must respond in a manner that is not when it has actual knowledge of sexual harassment occurring in the institution's education program or activity against a person in the United States

**2024:** K12 school districts have an obligation to take **prompt and effective action** to **end** any sex discrimination in their educational programs or activities, to **prevent** its recurrence, and to **remedy** its effects.

# 2020 Stages of Grievance Procedure



1

Notification of Incident to Title IX Coordinator

2

Offer of Formal Process

3

Investigation

4

Determination

Supportive Measures  
Jurisdiction  
Dismissals-Mandatory/Permissive  
Removal  
Formal complaint filed and  
investigation requested

Notice to Respondent  
Interviews/Review of  
Documents, Digital Records  
Investigation File Shared – 10  
day review  
Report Shared – 10 day review

Assignment and outreach - 10  
days to respond  
Determination:  
-Policy Violation, Discipline  
Outcome Notification

5

Appeal

\*Strict timelines around reviews; total time to complete investigation is not given

# 2024 Stages of Grievance Procedure



1

Notification of Incident to Title IX Coordinator

2

Initial Evaluation

Supportive Measures  
Jurisdiction  
Dismissal  
Removal  
Discussion of informal  
resolution with Complainant

3

Investigation

Notice to Respondent  
Interviews/Review of  
Documents, Digital Records  
Review of Investigation File by  
Parties  
Report (optional)

4

Determination

Questions/Cross Examination  
Credibility Assessment  
Determination:  
-Policy Violation, Discipline  
-Remedies  
Outcome Notification

5

Appeal

\*No set timelines; “reasonably prompt” standard





- Allegations of sex-based harassment could also be criminal behavior in the district's jurisdiction
- Employees of school district have "Mandatory Reporting" obligations with regard to reporting criminal behavior involving students
- A criminal investigation is separate and apart from the district's Title IX investigation
- If a Title IX investigation is triggered, then the district needs to conduct its own investigation of the facts to determine if the school's policies have been violated

# Rights of Parties to Investigation



Treat parties equitably

Provide notice of allegations  
(writing not required)

Objective evaluation of  
evidence, including relevance

Provide appropriate  
supportive measures

Have parent (or advisor)  
attend meetings, interviews,  
etc.

Receive written outcome

Title IX Administrators with no  
conflicts of interest or bias

Ability to provide and respond  
to evidence

Completed in a reasonably  
prompt timeframe and  
explain delays in procedure

Presumption of non-  
responsibility for Respondent

Review evidence/receive  
description of evidence with  
ability to inspect

Offer of appeal (if offered in  
other proceedings)

Ability to not participate in  
the Title IX grievance process

Take steps to protect  
confidentiality of parties and  
witnesses

Prohibit retaliation



Where to Begin?

Policy Review!

-expectations and timelines

Notice of Allegations

# Notice of Allegations



The Notice to the Parties must include:

Description of the incident(s) giving rise to the complaint

Parties' names

Allegations

Dates

Location

The applicable grievance procedures and informal resolution process

Notice that the parties will receive equal opportunity to access relevant and “not otherwise impermissible” evidence or an accurate description of the evidence

The Notice of Allegations must be updated if additional allegations of sex discrimination by Respondent toward the Complainant arise

Additional items the Notice of Allegations may include:

- Other potential policy violations (not just Title IX)
- Identification of the range of possible disciplinary sanctions and remedies (should be in policy)
- Statement that Respondent is presumed not responsible (previously required)
- Notification that a determination of responsibility will be made at the conclusion of the grievance process
- Notification that each party may have a parent or advisor (depends on policy)

# Notice of Allegations – 2024-Specific



## Written

- Provided to Respondent prior to an interview
- Writing should go to both parties
- May include non-Title IX potential violations

## Not in Writing

- Regulations do not require that the Notice of Allegations be put in writing
- Title IX Coordinator should provide scope to Investigator

The Notice of Allegations (whether in writing or not) must be revised if additional matters are uncovered and become part of the investigation.

➤ Title IX Coordinator responsibility



- Advisor Role at K12 Districts – DISTINCTIONS
  - Advisor required under 2020 regulations
  - Advisor permitted under 2024 regulations
- Parents – 2020 versus 2024 regulations
- 2024 regulations articulate parent rights:
  1. Invited to/accompany student to all meetings, interviews, and hearings
  2. Make decisions on behalf of the student
  3. Review of all relevant evidence or receive a description of evidence
  4. Receive outcome



1. Provide all documentation – Policies and Notice of Allegations
2. Offer to have a pre-interview meeting to discuss the process
3. Include information in your introduction that addresses potential questions
4. Remain calm, cool, and collected
5. Remind the advisor of the rules and advise that the next violation will end the interview
6. Consider allowing the advisor to participate in some fashion before the conclusion of the interview

# Supportive Measures - 2024



**PURPOSE:** Restore or preserve that party's access to the school's education program or activity, including measures that are designed to protect the safety of the parties or the school's educational environment.

During the investigation process, the Investigator may learn important information about how the parties are coping with the investigation and/or interactions between parties.

As Investigator, you do not need to solve these challenges, but you can advise the Title IX Coordinator so the school/district can ensure equal access to its programs and activities.



# Parties with Special Education Services - 2024



- Pro-active, mandatory requirement to consult with Special Education Department when a party is receiving special education services and a Title IX matter has arisen
- Potential modifications to the grievance process may be necessary to accommodate
- Title IX Coordinator should manage this outreach, but if it has not taken place, the Investigator should request guidance



## **Possible Modifications to Process**

- Conducting interviews
- Summarizing process
- Sharing information
- Manifestation determinations

## **Other Considerations**

- Tendency to keep matters within the Special Education department
- Advisors from Special Education
- Addressing confidentiality concerns



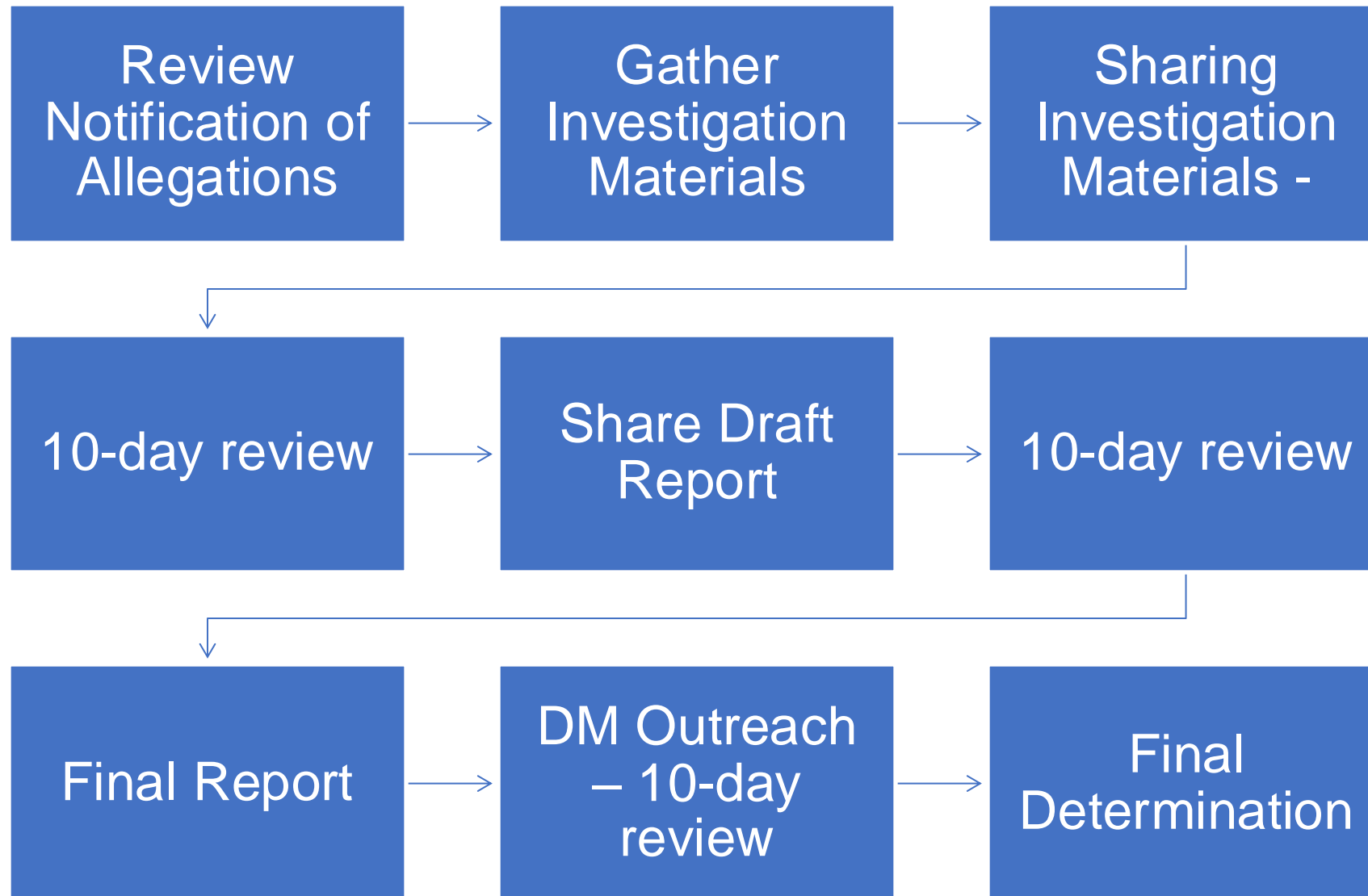
- Parties may select the informal process at any time
- If the process is not successful, parties return to investigation process
- Informal resolution can (re)start at anytime before final resolution of the matter
- Under 2024 regulations, investigator's access to any information obtained in the informal process will most likely be limited (policy should define if any access is permitted)
- Tread carefully in these areas during interviews



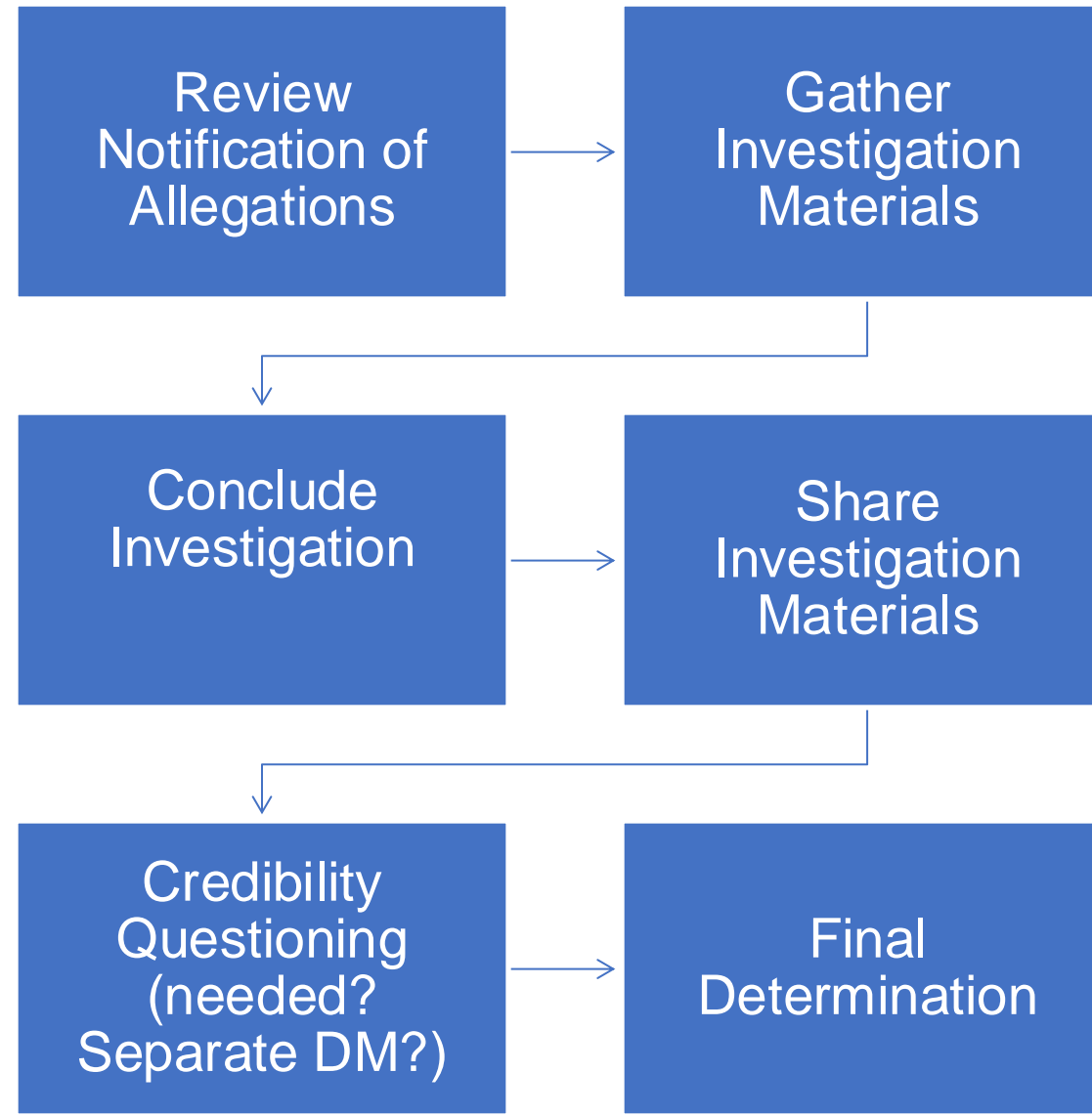
Responsibility to pro-actively seek out information to reach a reasoned conclusion

- Gather documents
  - Determine if video is available and secure it
  - Emails, messages, pictures, etc.
  - Interviews
  - Character
- **No evidence should potentially violate Child Pornography laws**

# Investigation Flow Chart for Investigator – 2020 Regs



# Investigation Flow Chart for Investigator – 2024 Regs



# Investigation Basic Elements



- ✓ Request information from the parties
- ✓ Determine if campus has relevant information
- ✓ Exclude any information that may have been gathered but runs afoul of Title IX required process
- ✓ Interviews
- ✓ Investigator follow-up interviews
- ✓ Investigation conclusion
- ✓ Sharing of investigation file
- ✓ Decisionmaker steps



# Gathering Evidence





- What is in dispute?
- What is the investigation timeline?
- What barriers to gathering information might exist?
- Can a timeline of events be created based on information known now?
- How many interviews will need to be conducted?
- Any special circumstances?
  
- Keeping the investigation timeline contemporaneously

# Preponderance of the Evidence



- More likely than not
- 50% + ?
- Same as standard in civil lawsuits
- Lower than the standard in criminal lawsuits

# Interviews – Central to Investigation Process



- Strategy as to which interviews take place when
- Flexibility to scheduling concerns
- In-person or Zoom interviews
- Location of interviews
- Preparation
  - Introduction
  - Questions prepared
  - Additional and follow-up – RESPONSIVE, FLEXIBLE
  - Identify other potential witnesses
  - Any other information?
- Participation by student parties and student witnesses cannot be compelled – could be deemed retaliation
  - Employees can be compelled

# Interview Questions



- Party or witness must answer directly
  - Start broad, get more narrow
  - Avoid being repetitive
  - Look for gaps in the information provided
  - Ask for definitions of terms – “hooking-up”
  - Focus in on what you need to know
- 
- Reflect on policy and what a decisionmaker will need to reach a conclusion



- Notes and Summary
- Transcript
- Either will have to be produced and reviewed



- Relevant versus irrelevant – 2024 Regulations call “impermissible”
- Burden of proof
- Specifically excluded under Regulations



- o Relevant means related to the allegations of sex discrimination under investigation as part of these grievance procedures
- o Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decisionmaker in determining whether the alleged sex discrimination occurred

# Specifically Excluded Under Regulations



- Evidence protected under privilege
  - Medical professionals (doctors, therapists)
- Rape shield protection
  - Prior sexual conduct not relevant, except
    - Prove that someone other than Respondent committed the act
    - Prior sexual conduct with Respondent, if offered to prove consent to the act
- 2024 NEW – Evidence related to Complainant’s sexual interests is never relevant
  - NOTE – Impermissible, even when offered by Complainant





- Hearsay
- Documents (paper, digital) no longer exist
- No one has admitted the behavior
- Not “convinced” this happened
- Credibility and honesty
  - Investigator or Decisionmaker assessment
- Expert testimony
  - Policy will advise whether experts are permitted
  - Expert testimony will require unique preparation
    - Qualifications, Expected Testimony, Reliance/Challenges



## 2020 Regulations

- Separate decision-maker (no discretion)
- 10-day wait period for parties to submit to named decision-maker
- Extent of follow-up is at discretion of decision-maker

## 2024 Regulations

- Procedure must allow for a credibility assessment of parties and witnesses
  - Even when Investigator and Decisionmaker are the same person
  - Policies may refer to “Questioning” phase
  - Allow for this to be done in writing or in-person
  - Follow-up may be required
- ❖ Decisionmaker role explored in NCR Training 11/20

# Avoid Bias and Conflict of Interest - 2020 and 2024



Impartiality

Address conflicts of interest  
as soon as they arise

Equitable process

Not favor Complainant  
or Respondent

Initial communications  
about participants in  
the process

Bias could occur  
throughout the  
process and needs to  
remain checked



- Sharing of the investigation file
  - 10-day review
- Draft report
  - 10-day review
- Final report sent to Decision-maker
  - 10 days to respond
- Outcome letters



- Sharing of investigation information
  - Full investigation file
  - List of investigation file and access upon request
  - Practical advice and tips?
- Investigation Report
  - Draft or Final?



- Report – 2020 versus 2024
- Suggestions to include:
  - Introduction
  - Allegations
  - Jurisdiction
  - Timeline for investigation
  - Policy provisions
  - Summary of documents
  - Summary of testimony
  - Credibility assessment
  - Conclusion – may include Recommended Conclusion as to Policy Violation



- Decision about policy violation
- Rationale for decision
- Discipline
  - Scope of discipline should be covered in policy
- Consider including other state-specific requirements



The institution's policy may not allow “discipline of a party, witness, or others participating in a school's grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the school's determination whether sex discrimination occurred.”





# Other TIX Investigator Responsibilities



Prohibit schools from disclosing personally identifiable information that they obtain through compliance with Title IX.

## Exceptions

- prior written consent of party
- information disclosed to parent of a minor



- A school must take reasonable steps to prevent and address the parties' and their advisors' unauthorized disclosure of information and evidence obtained solely through the grievance procedures.
- Exception: May share evidence gathered in investigation with parties and parents.
- Parties may not share the school's "work product" that may be disclosed during the resolution process.

# Trauma-Informed Approach – Not required under 2020 or 2024 regs



- Location of the interview
- Impact of trauma on memory
- Non-judgmental
- Acknowledge that some content might be awkward or uncomfortable
- Breaks and conclusion

# Document Checklist – What MUST be in File at a minimum!



## 2020 Regulations

- Outreach to offer formal process
- Formal complaint
- Notice of Allegations
- Investigation file
- Draft and Final Report
- Decision-Maker Outcome Letter
  - Communications throughout the outreach

## 2024 Regulations

- Notice of Allegations (writing for K12 not required)
- Investigation file
- Decisionmaker outcome letter
  - Communications throughout the process



## “Show Your Work”

- ✓ School responded promptly and effectively
- ✓ Investigation File
- ✓ Outreach to request interviews, documents, digital records, videos AND responses
- ✓ Dates of interviews, meetings, etc.
- ✓ Outreach to parties regarding delays
- ✓ Responses to questions about process
- ✓ Summary of investigation information
- ✓ Investigation file
- ✓ Responses from parties to investigation file
- ✓ Additional steps in investigation (if taken) after file review
- ✓ Outcome Letter



Coming Soon:  
Investigation Handbook Forms  
NCR Access for Members  
Both 2020 and 2024 Regulations

Join Us!



Title IX Consult, LLC Newsletter

First of each month

Title IX Thursdays

First Thursday of each month 12:30PM Pacific Time

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