

TITLE IX COORDINATORS

Roles and Responsibilities

IMPORTANT THINGS TO KNOW



Title IX requires all recipients of federal funds (i.e., school districts) to designate at least one Title IX coordinator.



OCR policy requires recipients to give this individual support and authority to do the job.

TITLE IX COORDINATOR

- *Title IX Coordinator*: “Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions which would be prohibited by” Title IX and its implementing regulations. (34 C.F.R. 106.8(a))

APRIL 24, 2015 DEAR COLLEAGUE LETTER

- ***Was not revoked by current administration, so it is still in effect.***
- Emphasizes the requirement to designate a coordinator
- Discusses coordinator's central role in the process
- Explains that the coordinator must have actual authority

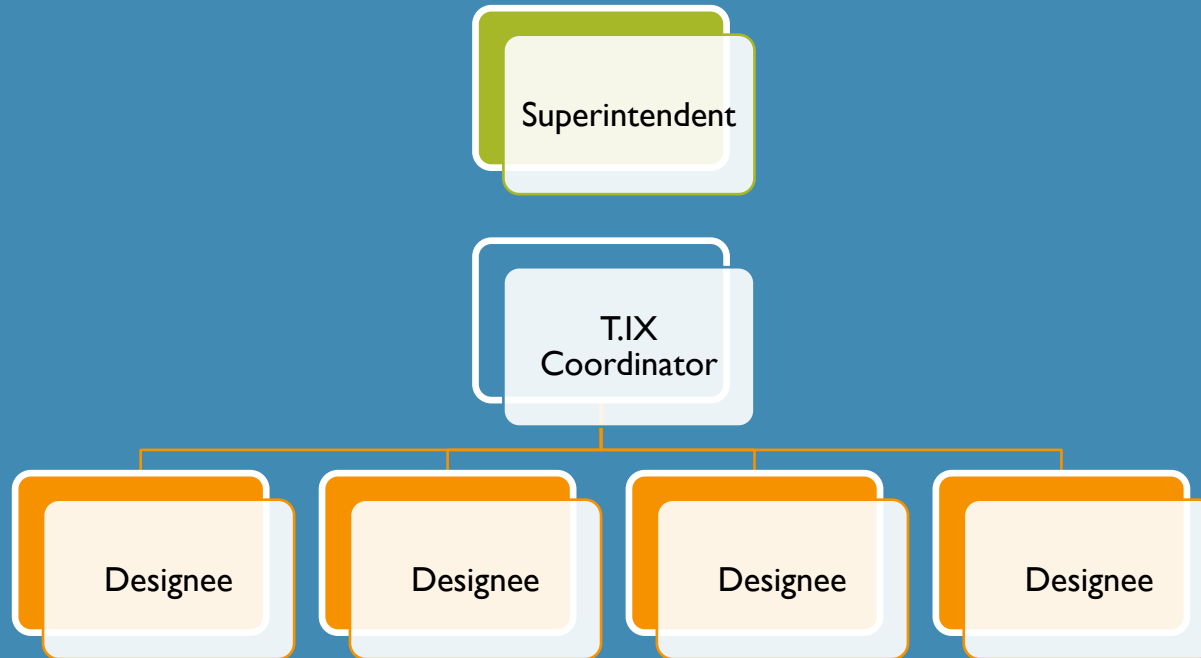
<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201504-title-ix-coordinators.pdf>



APRIL 24,
2015 DCL

- Must have a Title IX coordinator:
Designate at least one (1) employee to coordinate efforts to comply with Title IX
- Districts must provide *appropriate authority and support*
- **Independence**
 - Report to senior leadership

RECOMMENDED ORGANIZATIONAL CHART (FOR TITLE IX INVESTIGATIONS ONLY)



"Designee" should be site principal or assistant principal.



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- Visibility: Must notify students and employees of the name, office address, telephone number and email address of the Title IX coordinator.
- Training: Should be appropriately trained to carry out role.



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- Responsibilities:
 - Primary Responsibility: coordinate the recipient's compliance with Title IX, including the recipient's grievance procedures.
 - Others:
 - Have knowledge of the district's policies and procedures on sex discrimination
 - Be informed of all complaints raising Title IX issues, even if originally filed with another individual or office
 - Coordinate district responses to complaints involving sex discrimination



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- Monitor outcomes
- Identify and address patterns
- May determine outcome or institutional response to complaint



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- Assess effects on campus climate
- Annual climate surveys

BREAKING IT DOWN: WHAT ARE THE SPECIFICS
OF THE ROLE?

KNOW THE LAW & FEDERAL POLICIES

The coordinator must understand the law discussed in the previous section, including case law standards, OCR policies and expectations, etc.



POLICIES, GRIEVANCE PROCEDURES AND OUTREACH

- Ensure that the district has appropriate nondiscrimination and sexual harassment policies and related grievance procedures.
- Ensure that students, staff and the community are aware of the grievance procedures and how to file a complaint:
 - Staff training
 - Student handbooks
 - Website notices



LOCAL LAW ENFORCEMENT

Establish working relationships and procedures with local law enforcement

MOUs with local law enforcement

Understanding of different responsibilities

Working cooperatively

FERPA

DIFFERING ROLES

LAW ENFORCEMENT

Police Investigator

- Trying to establish probable cause for arrest
- Uses a wide lens
- Employs a variety of tactics
- Works for society in the interest of justice

SCHOOL DISTRICT

Administrative Investigator

- Determining violation of civil rights statute using civil standard of evidence (i.e., lower standard than criminal)
- Looks at only the reported case
- Generally straight forward approach
- Works for campus to ensure civil rights law and local policy compliance

TRAINING

- Staff training on sex discrimination and harassment (e.g., what it is, appropriate behaviors, how to recognize)
- Student education on sexual harassment, sexual assault/violence, sexual bullying, etc.
- Training individuals that will investigate reports of Title IX violations



GATEKEEPING

Is this actually a Title IX complaint or simply a violation of school policy?

INVESTIGATIONS

- Ensure investigators understand responsibilities and follow investigatory timelines
- Monitor investigations and provide advice/assistance
- Help with investigation strategy
- Ensure that appropriate interim measures are in place
- Monitor outcomes
- Notice of investigations
- Notice of outcomes
- Recordkeeping

HOLISTIC RESPONSIBILITIES

Monitor	Monitor data to identify and address patterns (specific schools, areas of school, types of harassment, individuals with multiple accusations against them, repeat offenders, etc.)
Climate Surveys	Conduct climate surveys: help the district determine a method to survey the campus climate
Safety Measures	Recommend specific safety measures, such as monitoring or security in problematic areas
Review	Review effectiveness of overall efforts