


HIGHER EDUCATION



TITLE IX INTRODUCTION AND OVERVIEW

©Institutional Compliance Solutions 2025 All Rights Reserved

1

LESSON ONE

WELCOME




©Institutional Compliance Solutions 2025 All Rights Reserved

2



AGENDA

- Lesson One Welcome
- Lesson Two How We Got Here
- Lesson Three The 2020 Regulations
- Lesson Four Title IX Team and Training Requirements
- Lesson Five Bias/Conflict of Interest
- Lesson Six Sexual Harassment
- Lesson Seven Jurisdiction
- Lesson Eight Grievance Procedures - Basics
- Lesson Nine Important Information
- Lesson Ten Closing Thoughts and Assessment



©Institutional Compliance Solutions 2025 All Rights Reserved

3

ABOUT US

OUR MISSION

To provide the best Care and Support for our clients, Community Partners, employees, contractors, collaborators, vendors, and all others who encounter our company.

GOAL

To assist schools and districts in providing a safe and healthy learning and working environment for students, faculty, and staff.



©Institutional Compliance Solutions 2025 All Rights Reserved

4



5



TRAINING APPROPRIATE FOR:

- ☒ Title IX Coordinators
- ☒ Deputies/Designees
- ☒ Decision-Makers
- ☒ Investigators
- ☒ Informal Resolution Facilitators
- ☒ Appellate Decision-Makers
- ☒ Others involved with Title IX



©Institutional Compliance Solutions 2025 All Rights Reserved

6

THIS COURSE COVERS:

Training for your Title IX Team under the 2020 Regulations



Includes Coordinators, Designees, Investigators, etc.



THIS COURSE DOES NOT COVER:



Training under your policies and procedures



Employee or student training requirements and/or recommendations



©Institutional Compliance Solutions 2025 All Rights Reserved

7

SEE YOU IN LESSON 2!



©Institutional Compliance Solutions 2025 All Rights Reserved

8

LESSON TWO

HOW WE GOT HERE



©Institutional Compliance Solutions 2025 All Rights Reserved

9

WHAT IS 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."



©Institutional Compliance Solutions 2025 All Rights Reserved

10



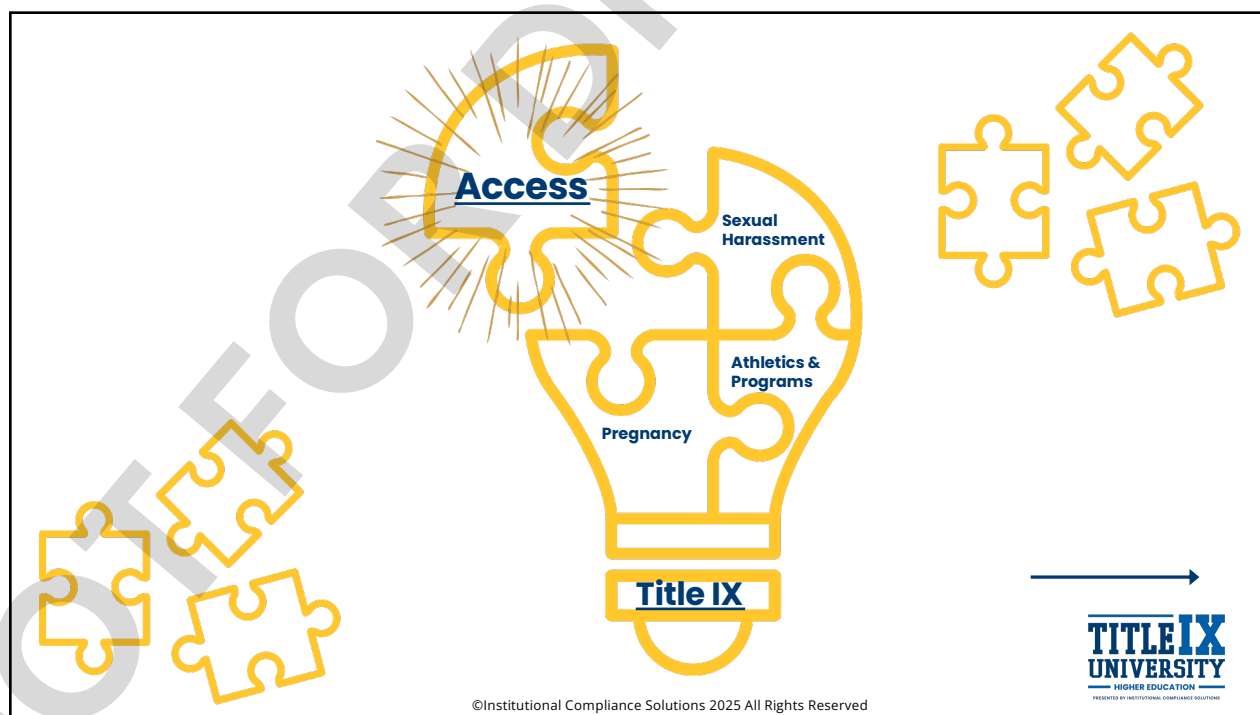
**Enforced by the Department of Education,
Office for Civil Rights.**

**Covers discrimination based on "sex",
gender-equity in athletics, pregnancy.**


TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

11



12



FOCUS:

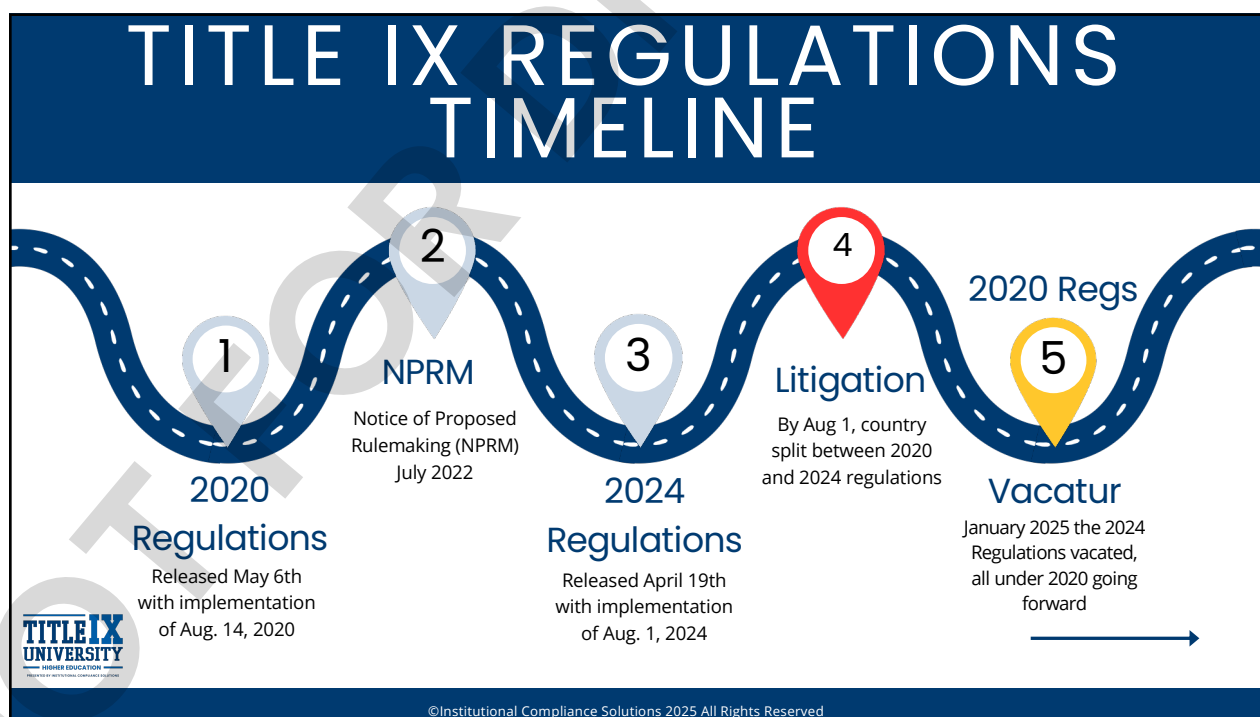
This training focuses on requirements for responding to and addressing Sexual Harassment under the Title IX regulations.

→

TITLE IX UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

13



14

NOTE:

Schools previously under the vacated 2024 regulations - you may have cases where your 2024 policy still applies.



©Institutional Compliance Solutions 2025 All Rights Reserved

15

SEE YOU IN LESSON 3!



©Institutional Compliance Solutions 2025 All Rights Reserved

16

LESSON THREE

THE 2020 REGULATIONS



©Institutional Compliance Solutions 2025 All Rights Reserved



17

BIG PICTURE



©Institutional Compliance Solutions 2025 All Rights Reserved



18

IMPACT AND IMPORTANCE OF 2024 DESPITE THE VACATUR


**Highlight of
Pregnancy
Requirements**


**Preamble -
Explanations**


**Best
Practices**


**Factors for Making
Decisions Even
Under 2020**



©Institutional Compliance Solutions 2025 All Rights Reserved

19

THE LEGALESE OF IT ALL...



01

Unofficial and published versions
of the regulations

02

34 CFR 106

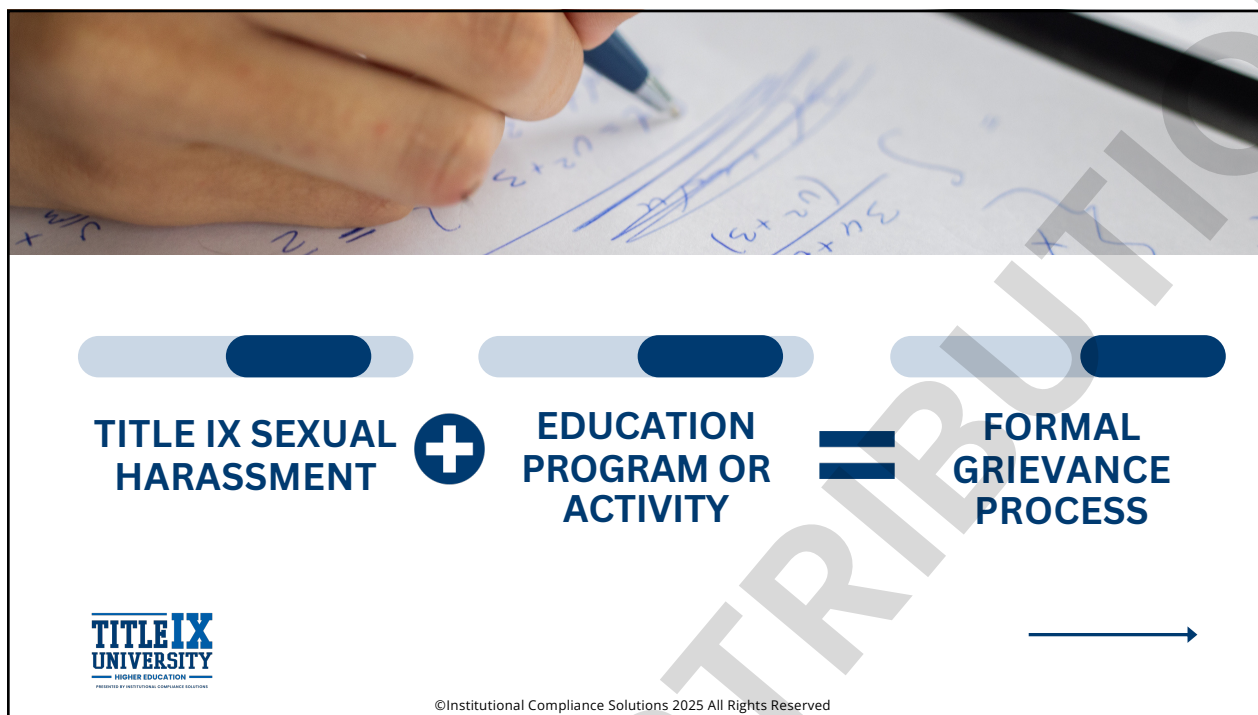
03

Preamble - what is it?



©Institutional Compliance Solutions 2025 All Rights Reserved

20



21



22

LANGUAGE MATTERS



©Institutional Compliance Solutions 2025 All Rights Reserved

23

"PARTIES" IN TITLE IX MATTER

COMPLAINANT

...an individual who is alleged to be the victim of conduct that could constitute sexual harassment.



©Institutional Compliance Solutions 2025 All Rights Reserved

RESPONDENT

...an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.



24




School and/or Coordinator are NOT a PARTY (Complainant) even if the matter is signed by the Title IX Coordinator






©Institutional Compliance Solutions 2025 All Rights Reserved

25

CONDUCT THAT INVOLVES



- 01 Student on student
- 02 Employee on employee
- 03 Student on employee
- 04 Employee on student

©Institutional Compliance Solutions 2025 All Rights Reserved

26



27



28




TITLE IX TEAM



©Institutional Compliance Solutions 2025 All Rights Reserved

29

TITLE IX TEAM




TITLE IX COORDINATOR

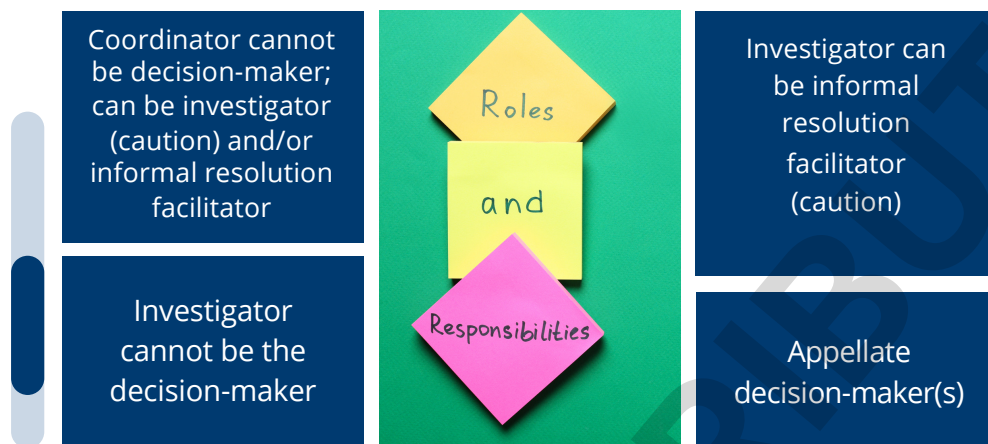
	Investigator(s)
	Decision-Maker(s)
	Appellate Decision-Maker(s)
	Informal Resolution Facilitators?



©Institutional Compliance Solutions 2025 All Rights Reserved

30

ROLE & RESPONSIBILITY OVERLAP



©Institutional Compliance Solutions 2025 All Rights Reserved

31

Others with Title IX Responsibility



OFFICIALS WITH AUTHORITY
(FACULTY/STAFF)



ADVISORS



SUPPORT TEAM



©Institutional Compliance Solutions 2025 All Rights Reserved

32



TRAINING FOR THE TITLE IX TEAM

TITLE IX UNIVERSITY
HIGHER EDUCATION
PROVIDING AN INSTITUTIONAL COMPLIANCE SOLUTION

©Institutional Compliance Solutions 2025 All Rights Reserved

33



TRAINING REQUIREMENTS

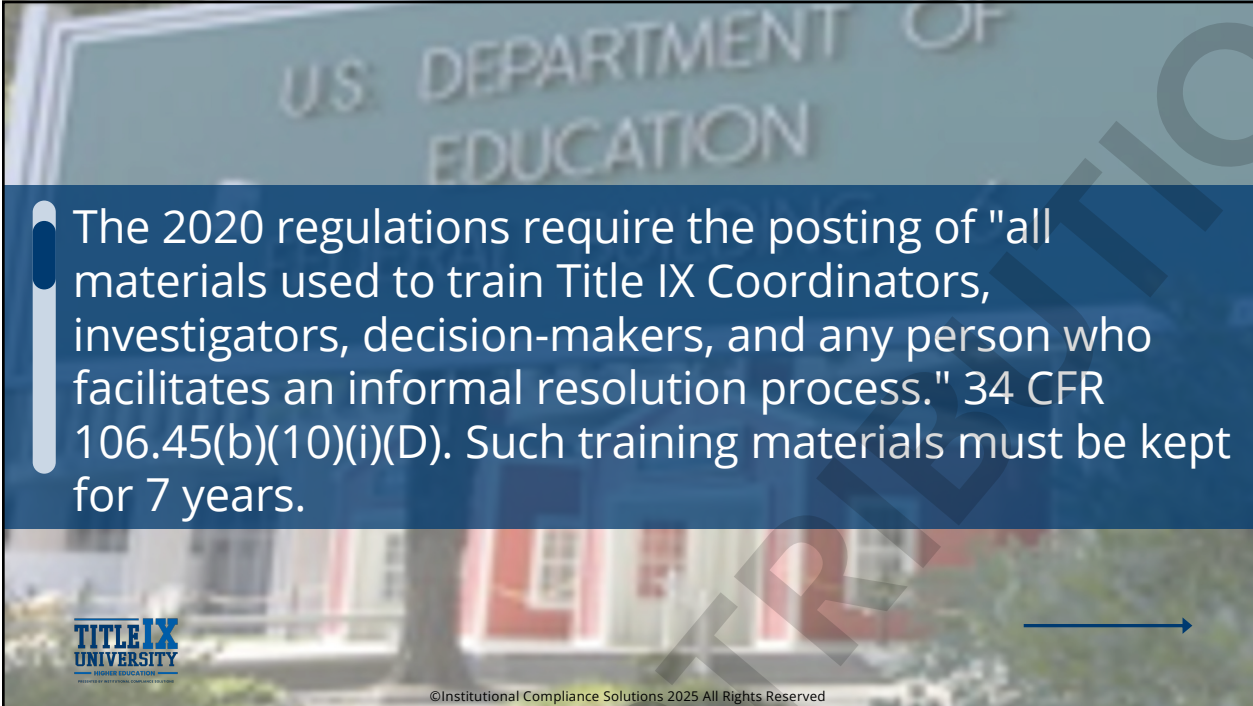
Under the 2020 Title IX regulations, the Title IX team must be trained on:

- Definition of sexual harassment
- Scope of school's program or activity
- How to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable
- How to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias
- Decision-makers and investigators must be trained on issues of relevance
- Decision-makers must be trained on any technology used at a live hearing

TITLE IX UNIVERSITY
HIGHER EDUCATION
PROVIDING AN INSTITUTIONAL COMPLIANCE SOLUTION

©Institutional Compliance Solutions 2025 All Rights Reserved

34




The 2020 regulations require the posting of "all materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process." 34 CFR 106.45(b)(10)(i)(D). Such training materials must be kept for 7 years.

TITLE IX UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

35



NOTE:

The Clery Act requires additional training requirements that apply to individuals who conduct grievance proceedings regarding allegations of sexual assault, dating violence, and stalking.

TITLE IX UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

36



SEE YOU IN LESSON 5!



TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

37

LESSON FIVE

AVOIDING BIAS AND CONFLICT OF INTEREST



TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

38



Title IX team must serve impartially in their role and avoid prejudgment of the facts as issue, conflicts of interest, and bias.

→

TITLEIX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

39



Conflict of interest or bias cannot be for or against complainants or respondents generally or the individual complainant or respondent in a matter.

⊘ Family friend is a witness in a matter.

⊘ Child is a party in a matter.

⊘ You are a witness in a matter.

⊘ Close relationship with a party.

→

TITLEIX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

40

WHY IS THIS IMPORTANT?



- Erodes trust in grievance procedures/creates barriers
- Decreases the ability to ensure a fair and reliable outcome



©Institutional Compliance Solutions 2025 All Rights Reserved

41

WAYS TO MITIGATE BIAS/CONFLICT OF INTEREST



Training that
avoids sex
stereotypes

Continuously
check your bias
throughout a
matter

Equitable
treatment of the
parties



©Institutional Compliance Solutions 2025 All Rights Reserved

42

IN EVERY CASE:



01

Evaluate whether you have a conflict of interest/bias at the outset of a matter.

02

Check biases throughout a matter.

03

Notify the Title IX Coordinator if a bias/conflict of interest arises. (What if you are the Coordinator?)



©Institutional Compliance Solutions 2025 All Rights Reserved

43

SEE YOU IN LESSON 6!



©Institutional Compliance Solutions 2025 All Rights Reserved

44

LESSON SIX

SEXUAL HARASSMENT



©Institutional Compliance Solutions 2025 All Rights Reserved

45



TITLE IX SEXUAL
HARASSMENT



EDUCATION
PROGRAM OR
ACTIVITY

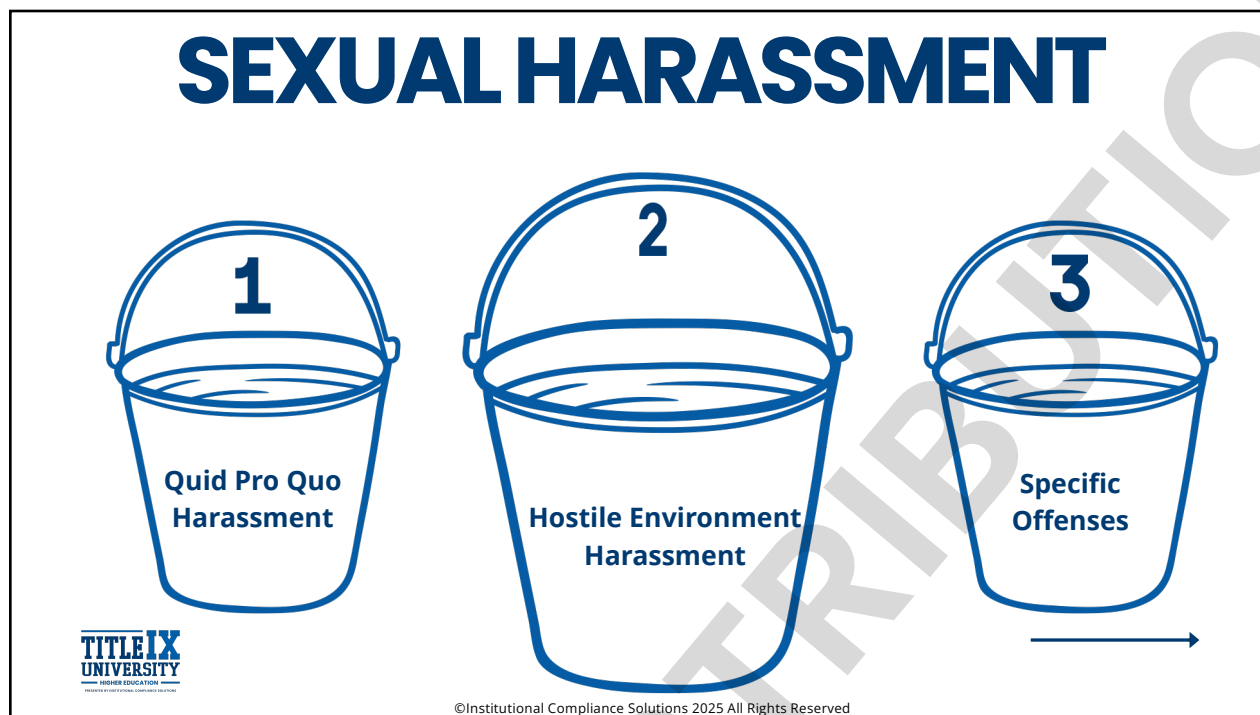


FORMAL
GRIEVANCE
PROCESS

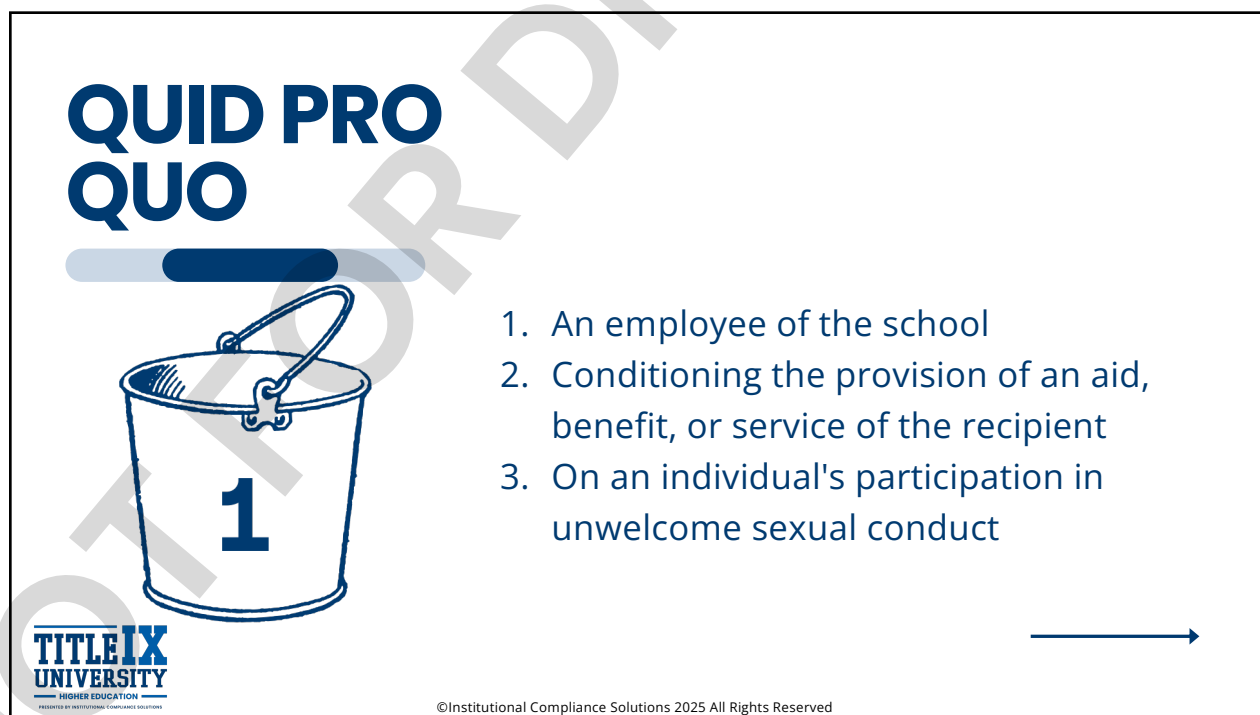


©Institutional Compliance Solutions 2025 All Rights Reserved

46



47



48

BUCKET #1 EXAMPLE



TITLE IX
UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

In a meeting with a junior faculty member, Dr. Smith informs the faculty member that if he engages in sexual activity with her, she will ensure he receives tenure and promotion.



©Institutional Compliance Solutions 2025 All Rights Reserved

49

HOSTILE ENVIRONMENT HARASSMENT



TITLE IX
UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

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

1. Severe - can be non-verbal through sexual assault (touching/fondling)
2. Pervasive - how often and how widespread
3. Objectively Offensive - behavior that would be offensive to a reasonable person under the circumstances



©Institutional Compliance Solutions 2025 All Rights Reserved

50

BUCKET #2 EXAMPLE



Lucy makes comments every day for two weeks about Jenny's body - some in writing and some verbally. Examples:

- "Look at your boobs"
- "Those jeans look great on your butt"
- "I wish I could hit that"
- Makes sexual noises when she sees her

Jenny is uncomfortable and has started skipping classes to avoid her.



©Institutional Compliance Solutions 2025 All Rights Reserved

51

FACT SPECIFIC INQUIRY to help determine hostile environment

**Note- this is derived from the 2024 regulations but is still helpful and appropriate for 2020*



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 location of the conduct and the context in which the conduct occurred

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

Other sexual harassment in the school's education program or activity



©Institutional Compliance Solutions 2025 All Rights Reserved

52

SPECIFIC OFFENSES



TITLE IX
UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

SPECIFIC OFFENSES

1. SEXUAL ASSAULT
 - a. RAPE
 - b. FONDLING
 - c. INCEST
 - d. STATUTORY RAPE
2. DATING VIOLENCE
3. DOMESTIC VIOLENCE
4. STALKING

©Institutional Compliance Solutions 2025 All Rights Reserved

53

SEXUAL ASSAULT

Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

Incest: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

TITLE IX
UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

54



IMPORTANT UPDATE



In June 23, 2025, the FBI issued its annual update to the National Incident-Based Reporting System (NIBRS) User Manual. This update broadens the Title IX definition of "fondling" to "criminal sexual contact". The new definition is:

- The intentional touching of the clothed or unclothed body parts without consent of the victim for the purpose of sexual degradation, sexual gratification, or sexual humiliation.
- The forced touching by the victim of the actor's clothed or unclothed body parts, without consent of the victim, for the purposes of sexual degradation, sexual gratification, or sexual humiliation.
- This includes instances where the victim is incapable of giving consent because of age or incapacity due to temporary or permanent mental or physical impairment or intoxication for the purpose of sexual degradation, sexual gratification, or sexual humiliation.

****Talk with your Coordinator and review your policies and procedures regarding your school's response to this change****



©Institutional Compliance Solutions 2025 All Rights Reserved

55

BUCKET #3 EXAMPLE



- **Rape:** Thomas pulls down James' pants in the locker room and puts a pen in James' rectum.
- **Fondling:** Laura grabs Phil's genitals over his shorts and squeezes while making a sexual comment.
- **Incest:** Ms. Jones has been sleeping with her nephew, a 17-year-old student.
- **Statutory Rape:** Adam, an 18-year-old Freshman, is caught in a sexual act with Dina, a 7th grade camper.



©Institutional Compliance Solutions 2025 All Rights Reserved

56


DATING VIOLENCE:

A CRIME COMMITTED BY A PERSON:

Who is or has been in a social relationship of a romantic or intimate nature with the victim; and

Where the existence of such a relationship shall be determined based on a consideration of the following factors:

- Length of relationship
- Type of relationship
- Frequency of interaction between the persons involved in the relationship




TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

57

BUCKET #3 EXAMPLE



Aria and Blake were in a dating relationship for about 6 months. After they broke up, Aria pushed Blake against the wall in the hallway.

TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

58

DOMESTIC VIOLENCE:

Felony or misdemeanor crimes committed by a person who:



Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction* of the recipient (school), or a person similarly situated to a spouse of the victim;

Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;

Shares a child in common with the victim; OR

Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.



©Institutional Compliance Solutions 2025 All Rights Reserved

59

BUCKET #3 EXAMPLE




Mr. Smith and Ms. Adams live together and are in a romantic relationship. One day Mr. Smith sees Ms. Adams flirting with another professor. Mr. Smith goes into Ms. Adams' classroom yelling and flips her desk.



©Institutional Compliance Solutions 2025 All Rights Reserved

60



STALKING:

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:


- Fear for the person's safety or the safety of others OR
- Suffer substantial emotional distress

TITLE IX UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

61

BUCKET #3 EXAMPLE




Landry leaves notes on Lindsay's car professing his love for her. He sits near her in the student center around lunch every day. Landry also calls her phone at all hours from multiple numbers. Lindsay ignores Landry but feels anxious about what he might do next.

TITLE IX UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

62



CONSENT:

Not defined under regulations — but you need to have one.

The Assistant Secretary will not require a recipient to adopt A PARTICULAR definition of consent.

TITLEIX UNIVERSITY
HIGHER EDUCATION
PROVIDED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

63



SEE YOU IN LESSON 7!

TITLEIX UNIVERSITY
HIGHER EDUCATION
PROVIDED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

64

LESSON SEVEN

JURISDICTION



TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

65

JURISDICTION = THE WHERE

"Education program or activity"



TITLE IX
UNIVERSITY
HIGHER EDUCATION

©Institutional Compliance Solutions 2025 All Rights Reserved

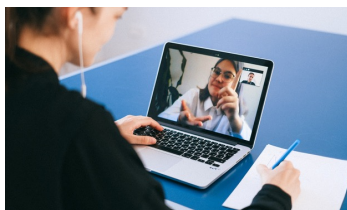
66

Jurisdiction

Education Program or Activity



Locations, events, or circumstances (operations) over which the school or district exercised substantial control over both the respondent AND the context in which the sexual harassment occurs.



Includes online sexual harassment but it must be analyzed to determine if it occurs in education program or activity.



Does not create or apply a geographic test, does not draw a line between "off campus/property" and "on campus/property," & does not create a distinction between sexual harassment occurring in person vs online.



©Institutional Compliance Solutions 2025 All Rights Reserved

67

THE BIG QUESTION



Does the Institution have control?

- Control over the location and/or event.
- Control over the Respondent (employee or student).



©Institutional Compliance Solutions 2025 All Rights Reserved

68

PROGRAM/ACTIVITY



CONTROL OVER RESPONDENT



CONTROL OVER LOCATION /
EVENT



TITLE IX



©Institutional Compliance Solutions 2025 All Rights Reserved

69

FINAL NOTE:

There is no time limit on bringing a report forward.



©Institutional Compliance Solutions 2025 All Rights Reserved

70



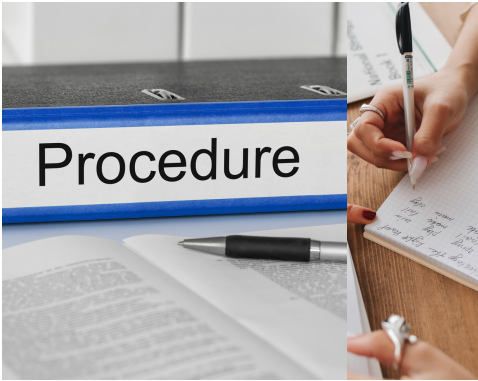
SEE YOU IN LESSON 8!



TITLEIX
UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS


©Institutional Compliance Solutions 2025 All Rights Reserved

71



**LESSON
EIGHT**

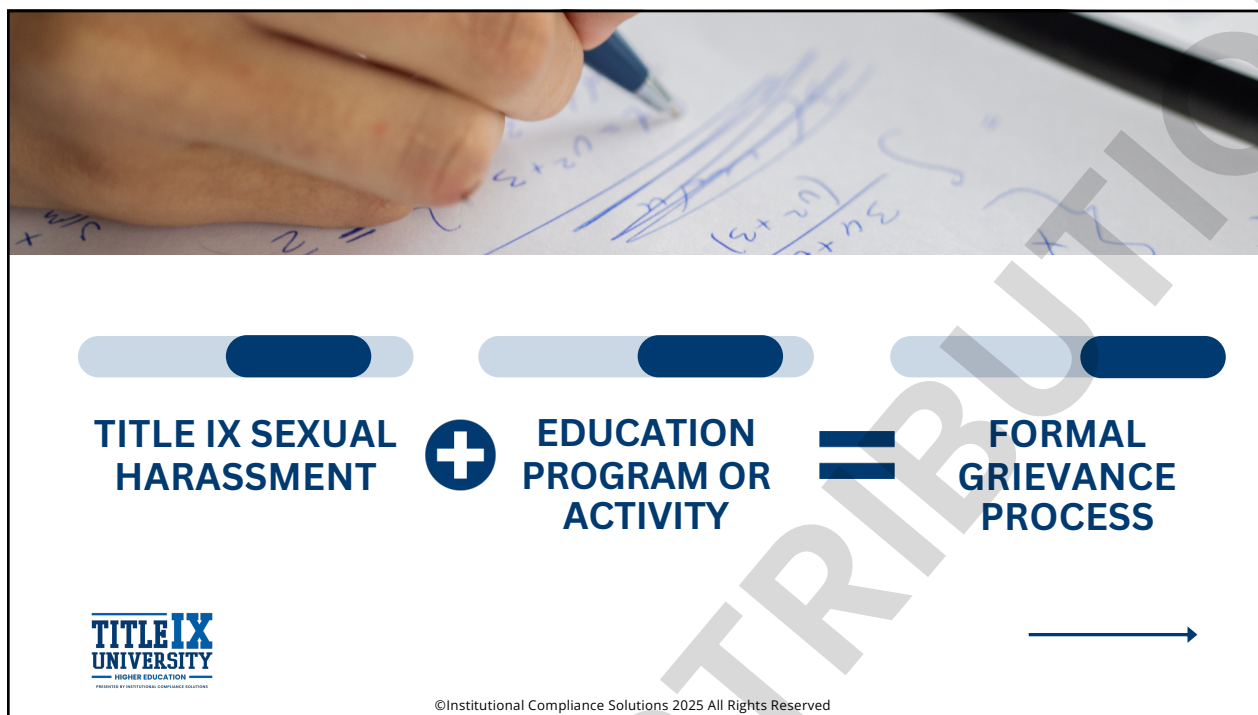
GRIEVANCE PROCEDURES - BASICS



TITLEIX
UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

72



73



74

FORMAL GRIEVANCE PROCEDURE

1 Title IX Coordinator meets with Complainant/Offers Supportive Measures

2 Formal Complaint

3 Notice of Allegations



4 Investigation

5 Determination

6 Appeal?

**Informal Resolution any time after Formal Complaint but before the Determination*



©Institutional Compliance Solutions 2025 All Rights Reserved

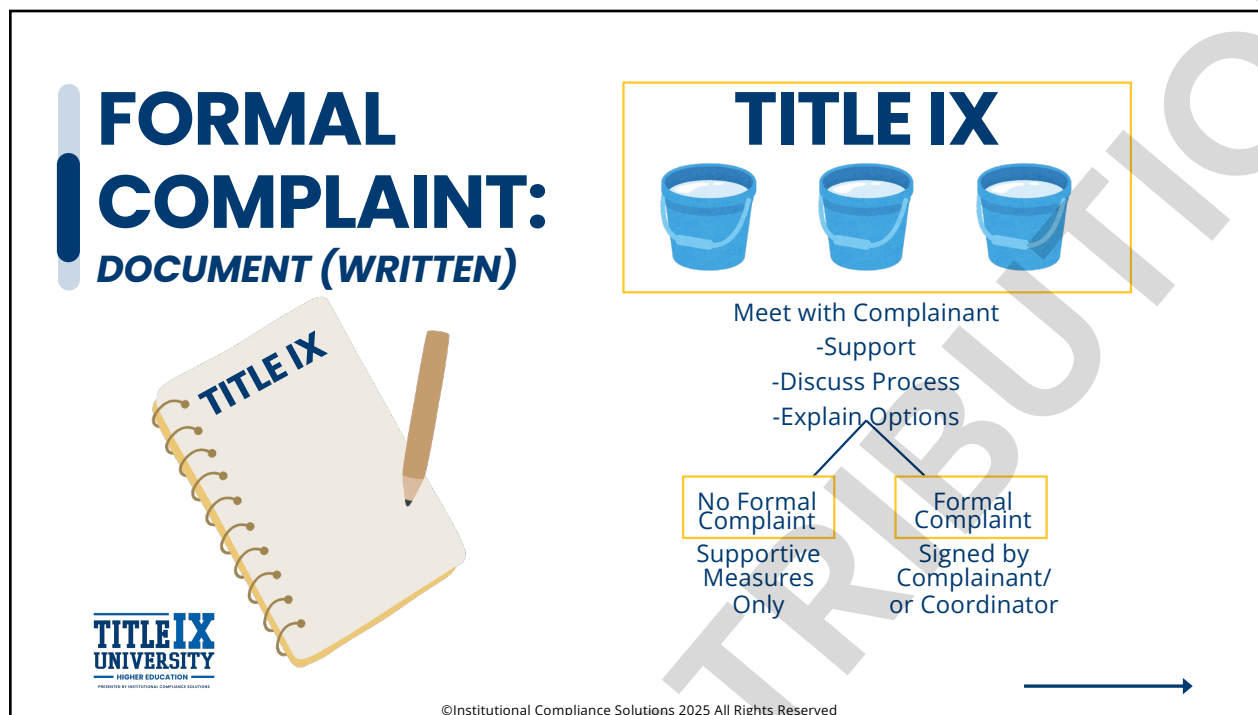
75

FORMAL COMPLAINT

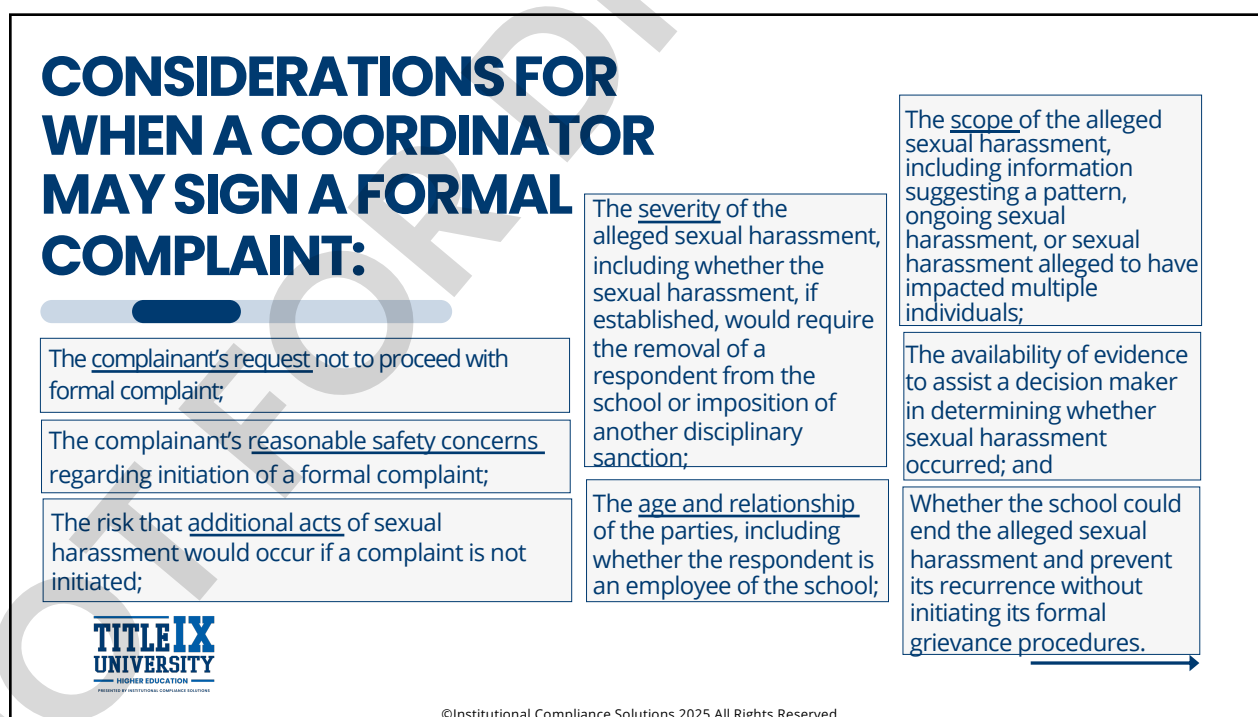


©Institutional Compliance Solutions 2025 All Rights Reserved

76



77



78

CONSOLIDATION OF FORMAL COMPLAINTS

School MAY consolidate Formal Complaints when the allegations of sexual harassment arise out of the same facts or circumstances and:

CONSOLIDATE

- Allegations are related to more than one Respondent
- Allegations are by more than one Complainant against one or more Respondent
- Allegations by one party against the other party (Cross Complaint)



©Institutional Compliance Solutions 2025 All Rights Reserved

79

REMINDER!!!



No Investigation before
or without a Formal
Complaint



©Institutional Compliance Solutions 2025 All Rights Reserved

80

NOTICE OF ALLEGATIONS



©Institutional Compliance Solutions 2025 All Rights Reserved



81

NOTICE OF ALLEGATIONS

WHAT IS INCLUDED:

- Notice of the school's grievance process
- Notice of the allegations of sexual harassment
- Sufficient details
 - Identities of the parties
 - Conduct that occurred
 - Date
 - Location
- Respondent is presumed not responsible
- Determination is made at the end of the grievance process
- Opportunity to have an advisor of choice (may be an attorney)
- Parties will have opportunity to inspect and review evidence
- Code of Conduct provisions related to false statements or false information



©Institutional Compliance Solutions 2025 All Rights Reserved

82

WHO ARE ADVISORS?



Anyone

- Attorney
- Parent
- Witness--- most challenging--- Not prohibited. Not recommended.

What is their purpose?

- Support
- Understanding
- Extra ears
- Should be copied on written correspondence and permitted to attend all meetings
- Potted plant



©Institutional Compliance Solutions 2025 All Rights Reserved

83

INVESTIGATION



©Institutional Compliance Solutions 2025 All Rights Reserved

84



REMINDER!!!

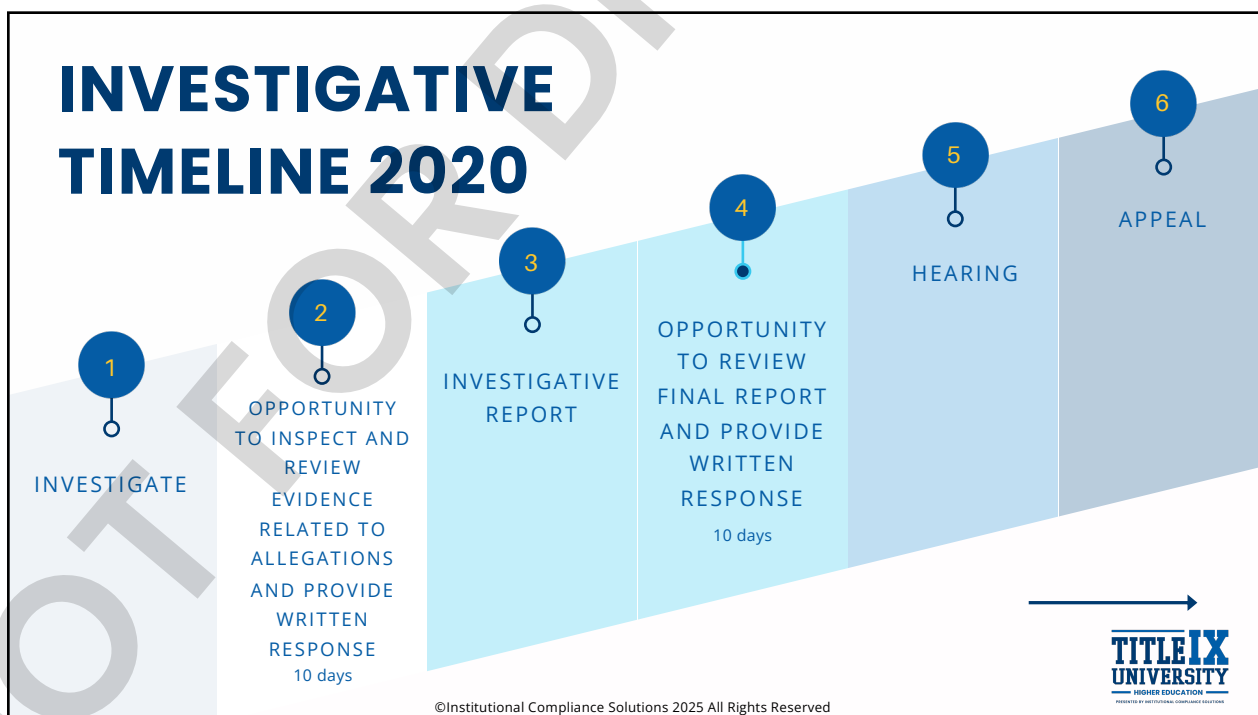
 Investigator cannot be the Decision-Maker

→


TITLEIX
UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

85



86



MUST: Provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is **DIRECTLY RELATED** to the allegations. Including:


- The evidence upon which the school does not intend to rely in reaching a determination
- Inculpatory or exculpatory evidence

SO THAT EACH PARTY CAN MEANINGFULLY RESPOND TO THE EVIDENCE PRIOR TO CONCLUSION OF THE INVESTIGATION.

TITLE IX UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

87



**HOW LONG?
10 DAYS
(BUSINESS OR
CALENDAR)
DEFINE IN POLICY**

TITLE IX UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

88

REPORT:



Organization of Report

- Only include “relevant” evidence
- SUMMARY of information from each party and witness
- DESCRIPTION of physical or digital evidence
- Timeline(s)
- Consistencies/inconsistencies
- At the end of the investigation there is a written investigative report and another 10 day response period for both parties

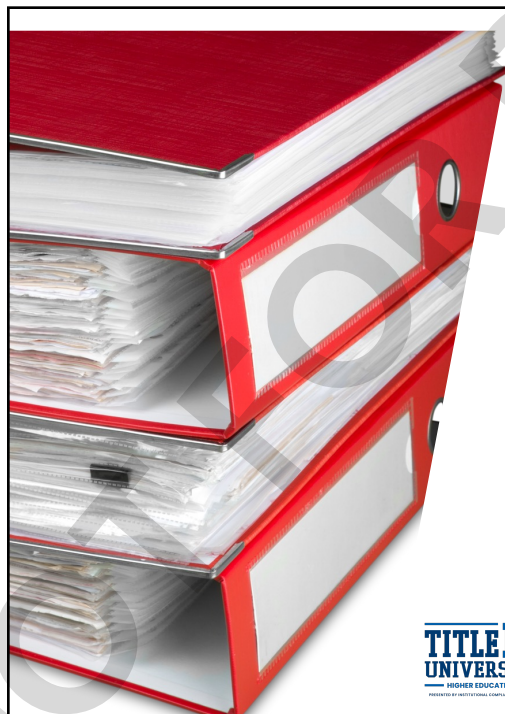


©Institutional Compliance Solutions 2025 All Rights Reserved

89

REVIEW OF REPORT

- Required 10 day review and response period (before determination)
- Consider waiting for response before sending to decision-maker



©Institutional Compliance Solutions 2025 All Rights Reserved

90

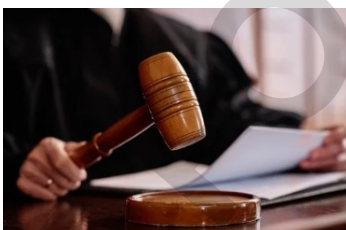
DETERMINATION



©Institutional Compliance Solutions 2025 All Rights Reserved

91

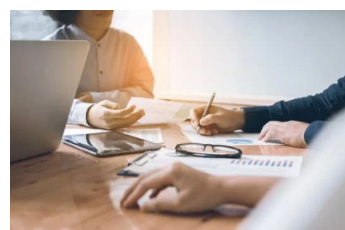
Regulations Require:



Live hearing



Provide advisors to the parties if they do not have one



Advisor-led cross-examination of parties and witnesses

**note: training on any technology used*



©Institutional Compliance Solutions 2025 All Rights Reserved

92

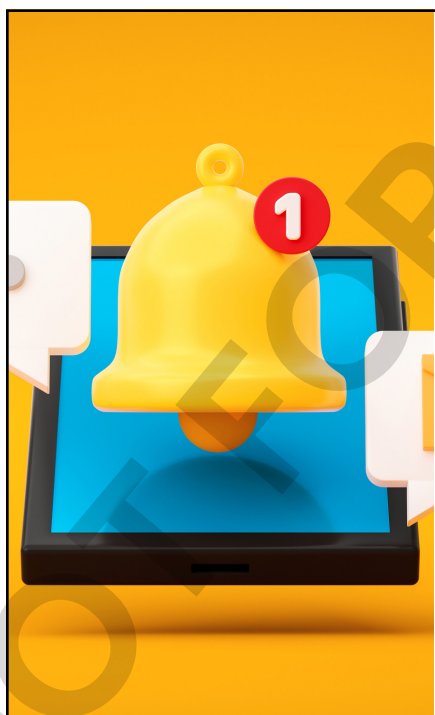
DECISION-MAKER DETERMINATION REGARDING RESPONSIBILITY CHECKLIST:



- Identification of the Allegations
- Description of Procedural Steps Taken
 - Notifications to the Parties
 - Interviews with Parties and Witnesses
 - Site Visits
 - Methods Used to Gather Other Evidence
 - Hearings Held
- Findings of Fact Supporting Determination
- Conclusions Regarding the Application of the Code of Conduct to the Facts
- Result of Each Allegation Including Rationale
 - Determination Regarding Responsibility
 - Disciplinary Sanctions
 - Whether Remedies Designed to Restore or Preserve Equal Access to Education Program or Activity Provided to the Complainant
- Procedures and Permissible Basis for Appeal

©Institutional Compliance Solutions 2025 All Rights Reserved

93



SIMULTANEOUS NOTIFICATION OF OUTCOME TO BOTH PARTIES



©Institutional Compliance Solutions 2025 All Rights Reserved

94



REMINDER!!!

- ✋ Make sure supports are in place when sending notification of determination.
- ✋ Send to BOTH parties and advisors/guardians simultaneously. Include appeal options.

→

TITLE IX UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

95

APPEALS



→

TITLE IX UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

96

APPEALS



Offered to both parties

Can appeal dismissal of Formal Complaint or any allegations therein or determination regarding responsibility

On the following basis:

- Procedural irregularity that affected the outcome of the matter
- New Evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter
- Title IX Coordinator, investigator, or decision-maker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter
- Additional bases if offered equally to both parties

Notify the other party in writing when an appeal is filed

Give both parties a reasonable opportunity to submit a written statement in support of or challenging the outcome

Written decision describing the result and rationale for the result

Provide written decision simultaneously to both parties



©Institutional Compliance Solutions 2025 All Rights Reserved

97

INFORMAL RESOLUTION



©Institutional Compliance Solutions 2025 All Rights Reserved

98

Informal Resolution



- 1 Cannot be offered as a condition of enrollment or continued employment
- 2 Cannot be offered to resolve employee on student allegations
- 3 After a Formal Complaint is filed
Prior to decision regarding responsibility
- 4 Parties cannot be required to participate
- 5 Institution must:
 - Provide written notice disclosing allegations, requirements of the informal resolution process including circumstances under which it preclude the parties from resuming a Formal Complaint arising from the same allegations
 - Allow any party the right to withdraw from the informal resolution process and resume grievance process with respect to Formal Complaint
 - Provide consequences resulting from informal resolution process including records maintained or shared
 - Obtain both parties voluntary, written consent to the informal resolution process

©Institutional Compliance Solutions 2025 All Rights Reserved

99

SEE YOU IN LESSON 9!



©Institutional Compliance Solutions 2025 All Rights Reserved

100

LESSON NINE

IMPORTANT INFORMATION



©Institutional Compliance Solutions 2025 All Rights Reserved

101

SUPPORTIVE MEASURES:

Individualized measures offered, as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

- Restore or preserve that party's access to the recipient's (school's) education program or activity, including measures that are designed to protect the safety of the parties or the recipient's (school's) educational environment; OR
- Provide support during the recipient's (school's) grievance procedures, or during the informal resolution process.



©Institutional Compliance Solutions 2025 All Rights Reserved

102



Disability Services/ Resources & Title IX Overlap



©Institutional Compliance Solutions 2025 All Rights Reserved

103



RECORDKEEPING



- Specific obligations to maintain records for seven years.
- You play an important part in the school complying with this mandate.



©Institutional Compliance Solutions 2025 All Rights Reserved

104



RETALIATION

- Retaliation prohibited in the regulations
- Allegations of retaliation do not have to go through the Formal Grievance Process

TITLE IX UNIVERSITY
HIGHER EDUCATION
PROVIDER OF INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

105



REMINDER:

✎ It is imperative that you are familiar with and follow YOUR policies and procedures.

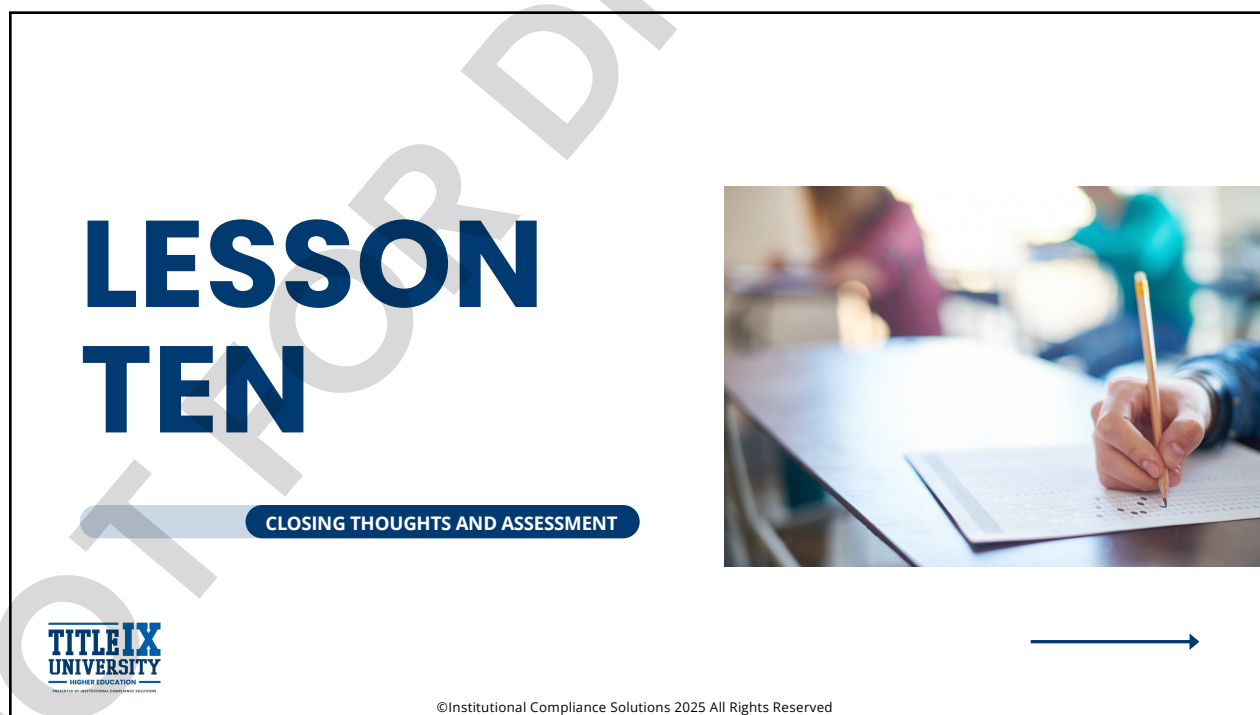
TITLE IX UNIVERSITY
HIGHER EDUCATION
PROVIDER OF INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

106



107



108



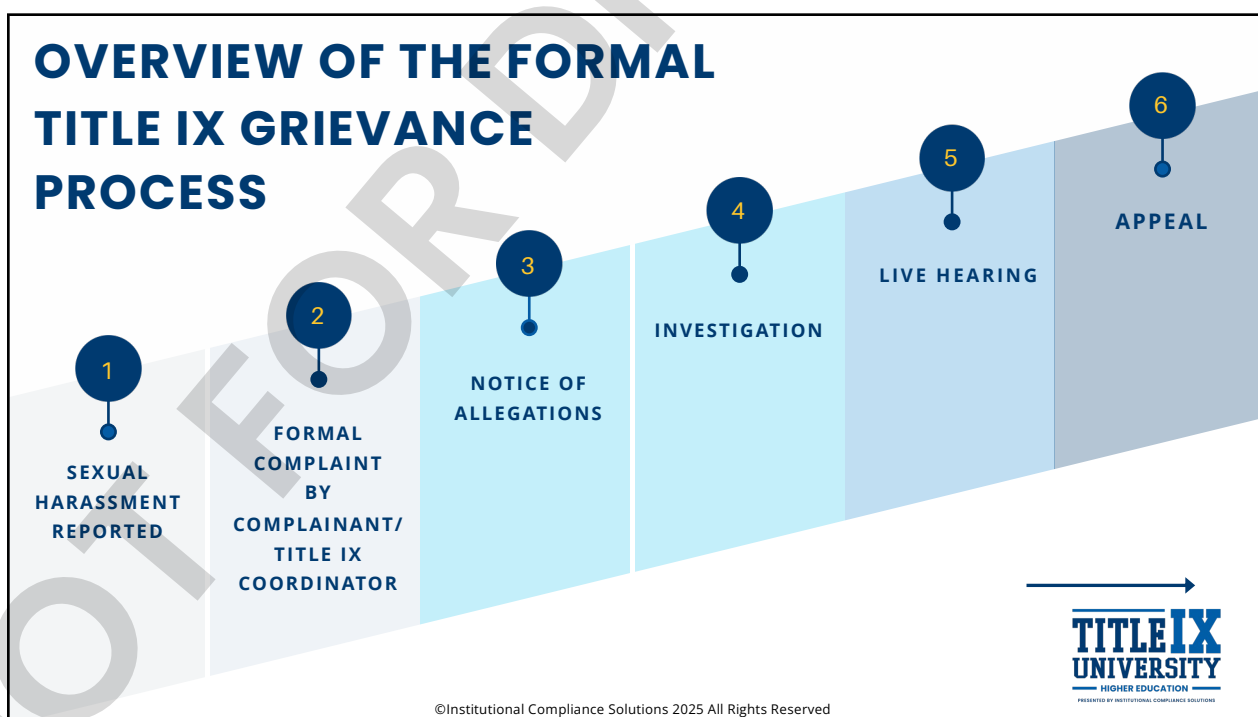
OVERVIEW OF THE PROCESS

→

TITLE IX
UNIVERSITY
— HIGHER EDUCATION —
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

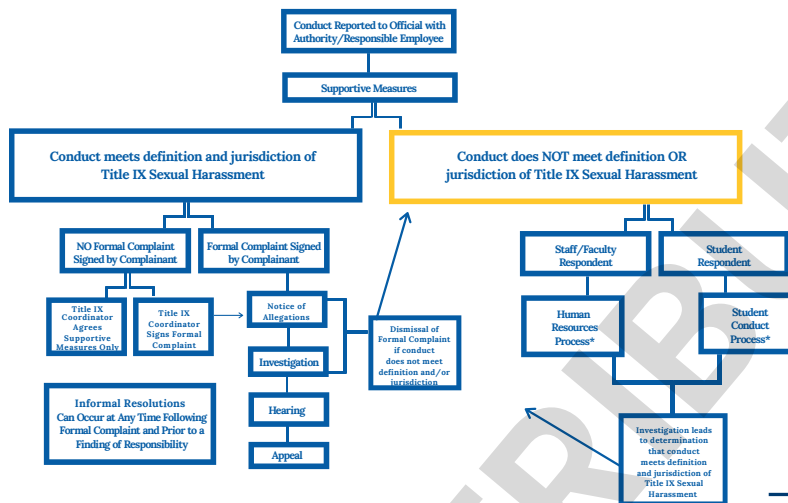
©Institutional Compliance Solutions 2025 All Rights Reserved

109



110

Title IX Process Flow Chart



©Institutional Compliance Solutions 2025 All Rights Reserved



111


TITLE IX COORDINATOR IS YOUR RESOURCE ON QUESTIONS

Need to be trained on YOUR specific policies and procedures.



©Institutional Compliance Solutions 2025 All Rights Reserved

112



**BE SURE YOU
HAVE CLARITY
ON YOUR ROLE
IN COMPLIANCE**

**TITLEIX
UNIVERSITY**
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

113



**WHAT IS
NEXT?**













Your training pathway
for your role.....

**TITLEIX
UNIVERSITY**
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

114

TITLE IX UNIVERSITY FUNDAMENTALS

	Title IX Introduction and Overview		Informal Resolution Facilitator
	Title IX Coordinator		Advisor
	Title IX Investigator		Introduction to the Clery Act
	Title IX Decision-Maker		Understanding Clery Geography
	Intro to Pregnancy and Related Conditions under Title IX		2020 Title IX Regulations Refresher (note: for those previously trained)
	Appellate Decision-Maker		Overview of Title VI

TITLE IX UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS


©Institutional Compliance Solutions 2025 All Rights Reserved

115


TRAINING PATHWAYS

Title IX Coordinator and/or Designee(s)

REQUIRED!



Title IX Introduction and Overview



Title IX Coordinator

Suggested to take all Fundamental Courses!

Intermediate and Advanced courses

→

TITLE IX UNIVERSITY
HIGHER EDUCATION
PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS

©Institutional Compliance Solutions 2025 All Rights Reserved

116

TRAINING PATHWAYS

Title IX Investigator



Title IX Decision-Maker



©Institutional Compliance Solutions 2025 All Rights Reserved

117

TRAINING PATHWAYS

Title IX Informal Resolution Facilitator



Title IX Appellate Decision-Maker



©Institutional Compliance Solutions 2025 All Rights Reserved

118

TRAINING PATHWAYS

Title IX Advisor



©Institutional Compliance Solutions 2025 All Rights Reserved

119

REMINDER!!!

👉 Do not forget your course downloads and other resources within Title IX University

👉 Triage Tool

👉 Survival Kit



©Institutional Compliance Solutions 2025 All Rights Reserved

120

QUESTIONS?

Title IX Coordinator
info@titleixu.com



©Institutional Compliance Solutions 2025 All Rights Reserved

121

CONGRATULATIONS!!



©Institutional Compliance Solutions 2025 All Rights Reserved

122