



Title IX Coordinator Training

Monthly PLC • October 13, 2026

System ownership, role assignment and federal training requirements





The Coordinator owns the system—not every decision

Coordinate compliance

Track training

Receive & evaluate initial reports

Arrange supportive measures

Explain complaint options

Assign trained, impartial personnel

Monitor timelines

Implement remedies

Maintain records

The Coordinator may serve as the investigator, **but may not serve as the decision-maker** in the same formal grievance process.

The role requires access, authority, and independence

1

Access

Give the Coordinator direct access to senior leadership and records.

2

Independence

Avoid conflicting duties that create bias or an appearance of bias.

3

Reachability

The title may be used in public notices, but families must be able to reach a real person promptly.





Title IX Coordinator required training

No specific hours • does not have to be annual

Definition & scope

- The definition of sexual harassment under the 2020 regulations
- The scope of the recipient's education program or activity, including when Title IX applies

The grievance process

- Investigations
- Hearings (postsecondary institutions)
- Appeals
- Informal resolution process
 - not available for complaints against staff

Serving impartially

- Avoid prejudgment of the facts
- Avoid conflicts of interest
- Avoid bias for or against complainants or respondents

Issues of relevance

- How to determine whether evidence or questions are relevant
- Rape shield provisions limiting questions about a complainant's prior sexual behavior or predisposition

In K-12, notice to any employee triggers the response duty

- Notice to any elementary or secondary school employee gives the district “actual knowledge.”
- Protect immediate safety, preserve information, route the report promptly, and do not promise secrecy or conduct a side investigation.
- Your staff needs to know this!



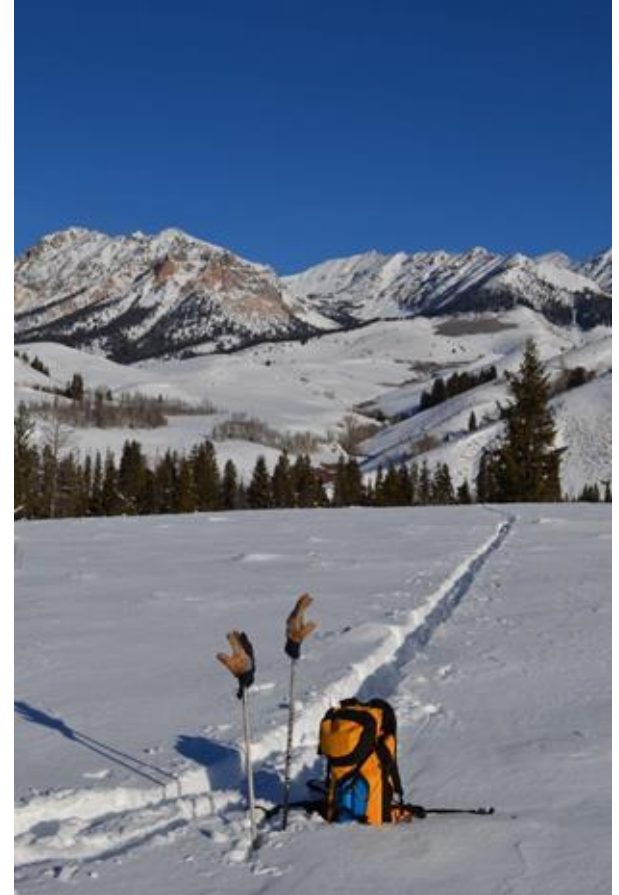
Make the Coordinator easy to find before a crisis

- Publish name or title, office address, email, and phone
- Notify students, parents or guardians, employees, applicants, and unions
- Accept reports in person, by mail, phone, email, or any method that reaches the Coordinator
- Reports may be made at any time — no statute of limitations

What is “Sexual Harassment” under Title IX?

- 1 Quid pro quo harassment
- 2 Unwelcome conduct that a reasonable person would find so **severe, pervasive AND objectively offensive** that it effectively denies equal access
- 3 Sexual assault, dating violence, domestic violence or stalking – as defined by federal law

Threshold questions: definition • U.S. education program or activity • formal complaint • standing



Definitions: sexual assault, dating violence, domestic violence, stalking

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 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 purpose of sexual degradation, sexual gratification, or sexual humiliation.

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 under Idaho law.

- If one person is 16 or older, three year difference max.
- Humans 15 and under cannot legally consent to sex in Idaho.



Read the definitions carefully

Dating violence – prior dating relationship?

Stalking – is it based on sex?

Domestic violence – live together?



The first response must be prompt and supportive

- The Coordinator promptly contacts the complainant, discusses supportive measures, considers the complainant's wishes, explains how to file a formal complaint, and documents the response.
- Explain confidentiality: must you report to law enforcement? Anonymous reporting is not an option in Title IX.
- Supportive measures are available with or without a formal complaint.
- Explain Informal Resolution option
 - must have formal complaint
 - Cannot be used if complaint is student v. staff

Intake is a response workflow, not an interrogation

- 1 Confirm immediate safety
- 2 Listen without pressing for a full account
- 3 Explain privacy limits
- 4 Discuss supportive measures
- 5 Explain the formal complaint option
- 6 Document what was offered and why

Every report triggers outreach—not necessarily an investigation

The Coordinator is the gatekeeper – if it is not Title IX-level harassment, use other tools. Screen jurisdiction and immediate safety concerns without prejudging responsibility.

Regulatory
definition

+

U.S. education
program or activity

+

Required complaint
conditions

= Federal grievance process



If Title IX scope is not met, consider other district policies, safety obligations, disability law, mandatory reporting and supportive action. **A Title IX dismissal is not a directive to ignore the conduct.**



Tools: support, emergency removal and discipline

Supportive measures

Individualized, non-disciplinary, non-punitive and no fee. Preserve equal access, do not unreasonably burden the other party, and adjust as circumstances change.

Emergency removal

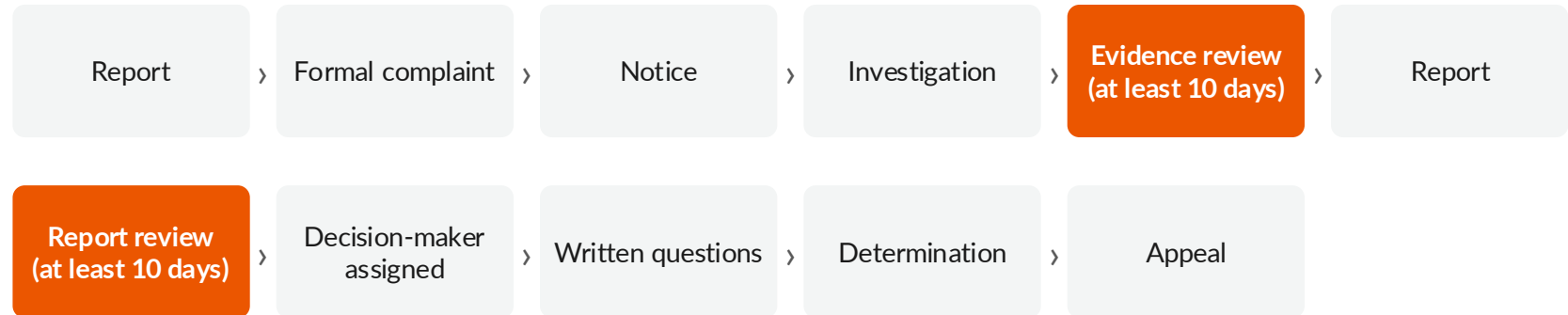
Individualized safety and risk analysis; immediate threat to physical health or safety; notice and immediate opportunity to challenge.

Discipline

Only after the grievance process determines responsibility.

The grievance process... it's SLOW

Two 10-day review periods



The report review must be at least 10 days before the decision or hearing.

Informal resolution may occur at any time prior to a final decision.

Must wait to interview the Respondent until AFTER notice, and a “sufficient” time to prepare.
Manage expectations.



Formal complaints and role assignments

Use authority carefully • separate functions • ensure impartiality

A formal complaint starts the federal grievance process

- A document or electronic submission filed by the complainant—or signed by the Coordinator—requesting an investigation.
- Parents and guardians may exercise rights for minors.
- A Coordinator signature initiates the process but does not make the Coordinator a party or advocate.
 - If signed the Coordinator, the "complainant" is still the alleged victim.

Separate the key functions and check conflicts

Coordinator

System owner and remedy implementation

Investigator

Evidence gathering and report

Decision-maker

Independent responsibility determination

Appeal decision-maker

Not the original decision-maker, dismissal official, investigator or Coordinator

Informal resolution facilitator

Trained, neutral and conflict-free



Role-specific training

- **Investigator:** Relevance needed for a fair summary of relevant evidence.
- **Decision-maker:** Relevance—including sexual-history limits—and live-hearing technology if a hearing is used.
- **Appeal decision-maker:** The same decision-maker training and independence rules.
- **Facilitator:** The informal-resolution process as applicable.
- **Advisors:** No federal training mandate.

All four roles need to be trained on the system in general.

What evidence is barred?

- Complainant's **prior sexual behavior or sexual predisposition**: unless for consent.
- Medical/mental health **treatment records** without written consent.
- **Privileged communications** attorney-client, doctor-patient, clergy
 - NOT School counselor. Mandatory reporting trumps confidentiality.
 - Practice point: school counselors need coaching.



Impartiality — the core duty

34 C.F.R. § 106.45(b)(1)(iii)

No prejudice

Presume the Respondent is not responsible until the process concludes.

No conflicts of interest

No financial, personal, or professional stake in the outcome.

No bias

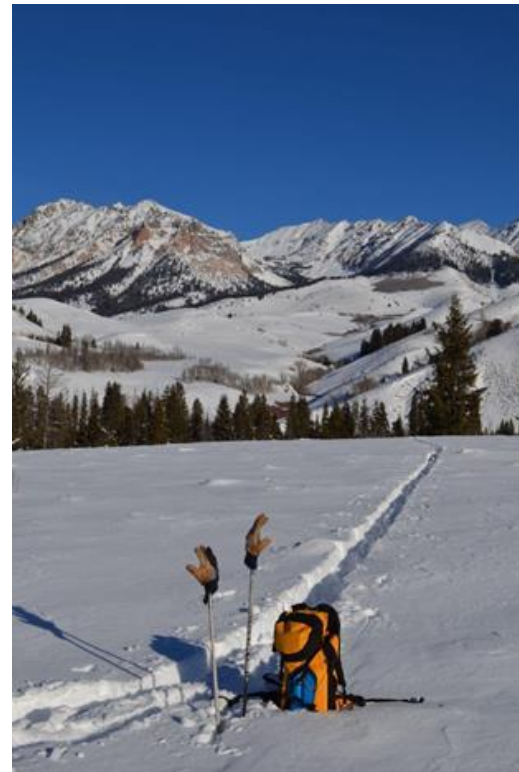
Not for or against complainants or respondents — generally, or in this specific case.

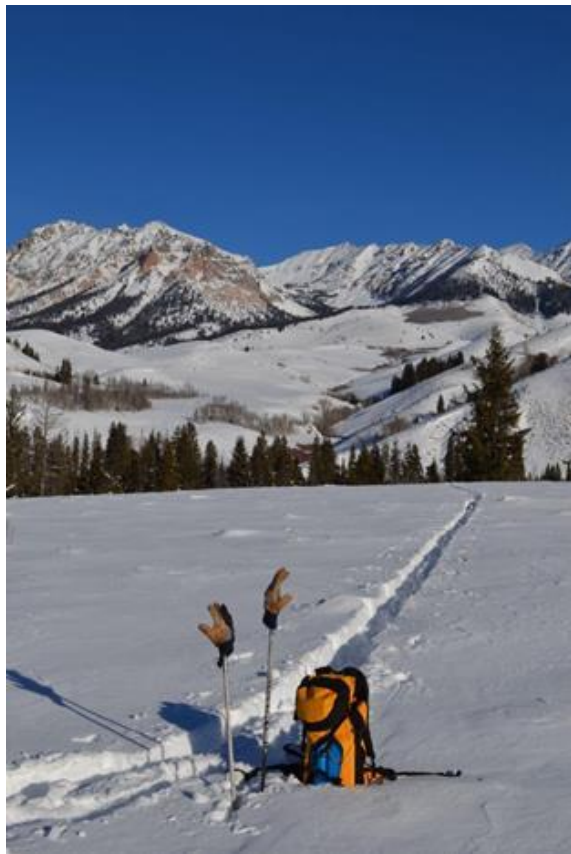
Applies to every role: Coordinator, investigators, decision-makers, facilitators, appeal officers.



Practical tools in the Investigation

- Supportive Measures
 - No Contact Orders
 - Schedule Changes
 - Extracurricular
 - Counseling
 - Academic accommodations
- Track Investigation
 - Start to finish – every point of contact
- Notices
 - Notice of Allegations
 - Notice of Decision Maker
 - Notice of Decision/Finding of Responsibility
 - Notice of Appeal
- Informal resolution
 - Notice of informal resolution
 - Notice of resolution/lack of





Title IX Coordinators must assure records are maintained

7

years

retention for Title IX records

- Investigations, determinations, sanctions, remedies, appeals, and informal resolutions
 - Supportive measures and the basis for the response
 - Training materials for Title IX personnel
-
- Post training materials publicly on the district website.
 - Use a case log to track every contact, deadline, decision, and rationale.



Build a compliance calendar and program map

- ☐ Website notice and Coordinator contact information
- ☐ Grievance procedures and reporting methods
- ☐ Athletics, CTE, pregnancy/parenting and employment checks
- ☐ Annual policy review—not a federally mandated annual training rule
- ☐ Role training, public materials and seven-year records

Snapshot compliance

- Train staff
- Post training materials on the district website
- Avoid sex stereotypes
- Promote impartiality
- Retain training and case records seven years



Questions?

Next PLC: Nov. 10, 2026 — Investigations 101
Second Tuesday of the month • 9 a.m. MST

