







KEY ELEMENTS OF TITLE IX

Table A-1. Key Elements of Title IX Guidance with Regard to Preventing School Employee Sexual Misconduct

Elements of Title IX Guidance	Description	References
 POLICIES AND PROCEDURES	Develop a clear school employee sexual misconduct policy that includes 1) discussion of grooming behaviors, 2) clear guidance on appropriate and inappropriate behaviors, 3) description of grievance procedures, 4) designation of a Title IX coordinator, and 5) notice of nondiscrimination.	A pp. 16–18 B pp. 4,14,19–21 C pp. 6–9 D pp. 9–13
 PREVENTION	Take proactive measures to prevent sexual harassment and violence, such as developing preventive education programs, hosting orientation programs, and distributing rules and resources.	B pp. 19 C pp. 14–15 D pp. 38–41
 TRAINING	Provide trainings to school employees, students, and parents regarding what school employee sexual misconduct is and ensure everyone understands what types of conduct are prohibited and how to respond when problems arise.	B pp. 13, 21 D pp. 4–5, 16, 38–42
 REPORTING	Ensure that all employees know their reporting obligations and how to respond to reports of school employee sexual misconduct. Establish procedures to protect the identity of the complainant and victim. Develop procedures to comply with state and local mandatory reporting requirements.	A pp. 15 B pp. 13–14 C pp. 13 D pp. 4,14–19, 38
 INVESTIGATIONS	Designate an experienced, trained individual to conduct investigations. Conduct investigations promptly and coordinate efforts with criminal investigations. Consider entering into an MOU with law enforcement or victim service providers. Notify all parties in writing of the outcome of a complaint.	A pp. 9–12 B pp. 13–19 C pp. 9–14 D pp. 24–28
 RESPONSE	Take immediate and effective corrective action to end the harassment and prevent any further harassment, including 1) providing victim services, 2) training and retraining employees, 3) developing materials on sexual violence, 4) conducting prevention programs with students, 5) issuing updated policy statements, 6) conducting a climate check, and 7) developing a protocol for working with law enforcement.	A pp. 13–14 B pp. 10,15–17,42–43 C pp. 15–19 D pp. 4, 20, 34–37, 42

A- *Sexual Harassment: It's Not Academic*, US DOE, Office of Civil Rights, 2008

B- *Revised Sexual Harassment Guidance: Harassment of Students by School Employees, Other Students or Third Parties*, US DOE, Office of Civil Rights, 2001

C- *Dear Colleague Letter: Sexual Violence*, US DOE Office for Civil Rights, 2011

D- *Questions and Answers on Title IX and Sexual Violence*, US DOE, Office of Civil Rights, 2014