



California State University San Marcos
Title IX Assessment
Observations and Recommendations
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INTRODUCTION

The California State University San Marcos (hereinafter “CSUSM”) campus retained TNG to conduct an assessment of the Title IX operations at the university, and to provide recommendations for best practices.¹ Specific cases provided by the University to be reviewed were those in which a student initiated an allegation of sex/gender misconduct against a faculty or staff employee. The cases reviewed for this report were not evaluated individually for compliance but were provided for review to enable the reviewer to understand the complexity of these types of cases in which other University and System offices, in addition to the Title IX Office, engage in decision-making at various points in the process. The examination of these cases, as well as the review of policies and other documents provided for my overall assessment, along with the extensive interviews conducted enabled me to develop an in-depth understanding of the process involving Title IX allegations and to develop feedback on the Title IX operation at CSUSM. Thus, the observations and recommendations reflected in this report apply to the entire Title IX process, not only those reviewed cases involving students and employees.

The goal of this assessment is to identify and suggest best practice recommendations that may be considered by the University going forward to improve the CSUSM campus implementation of Title IX for all individuals involved, consistent with the California State System (hereinafter “System”) policy entitled “CSU Policy Prohibiting Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking and Retaliation” (hereinafter “Non-discrimination Policy” or “policy”) and the accompanying procedures.² Additionally, this assessment incorporates the accompanying Discrimination, Harassment and Retaliation function that operates in conjunction with the Title IX Office at CSUSM, and applies to all other forms of protected status discrimination. It’s important to note that although the cases reviewed as a part of this assessment occurred prior to the implementation of the federal 2020 Title IX regulations. The recommendation in this document reflects current best practices and the regulatory standards established in the 2020 Title IX regulations as well as current California legal requirements for Title IX compliance, relevant case law and System policy.

Multiple individuals that were interviewed were complimentary about the Title IX Office and how thorough, and straight-forward the Title IX staff is, and I received several comments regarding the Title IX office manner of operating a program with a high level of integrity. I was impressed with the universal opinion expressed from those individuals interviewed of the compassion and caring that exists both within the Title IX Office and the university toward individuals reporting an allegation to the Title IX Office. While some individuals expressed

¹ *Best practice recommendations are those recommendations that may be above and beyond what is required by established System policy, state law or federal regulations*

² *The System-wide policy cited is the applicable policy for CSUSM.*

concerns regarding a specific case, or certain elements of the process, overall, there is generally a very favorable impression of the staff of the Title IX Office.

My review of the Title IX and Discrimination, Harassment and Retaliation operation (hereinafter “Title IX/DHR”) at CSUSM demonstrated that the Title IX/DHR function meets the compliance requirements (aka “industry standards”) as established by federal law, state law and System policies in all areas and exceeds them in many areas. However, like any program, there are areas where moving from System and industry standards of compliance to best practice can substantially improve the impact of the overall Title IX and DHR implementation and effectiveness. A part of my charge in conducting this assessment was to provide recommendations for best practice considerations that would support the Title IX and DHR operation to continue to serve CSUSM not only through implementation of System and industry standards and best practices currently in place, but also to recommend additional considerations for best practices to further enhance a system of excellence for the campus.

METHODOLOGY

The TNG assessment protocol provided an understanding of the Title IX process from the point at which a student would make an initial allegation of sex/gender misconduct against an employee through the final resolution of the matter. This assessment did not include a review of all student cases. The select case review was intended to provide insight into student: employee cases only in order to understand the complexity of the process involving student allegations more fully when made against a faculty or staff member. In order to understand the process from the many important stakeholder viewpoints, this assessment included in-depth interviews with twenty-four individuals that included current students, former students, faculty members, academic leadership, university administrators, current and former employees of Title IX related programs, advocates, and complainants.

This assessment consisted of a review of the following internal documents for the purpose of further understanding the full process and the policies in place that impact the effect or the outcome of many elements of the process.

- * CSUSM’s Sexual Harassment Task Force report (June 2022) ;
<https://www.csusm.edu/president/initiatives/harassment/index.html>
 - * <https://www.csusm.edu/president/initiatives/harassment/documents/harassment-taskforce-report.pdf>.
- * CSUSM’s Title IX Webpage and associated links <https://www.csusm.edu/title9/index.html>
 - * <https://www.csusm.edu/title9/policy/index.html>
 - * <https://www.csusm.edu/title9/policy/annualreports.html>
- * CSU System-wide Non-Discrimination Policy and Procedures:
<https://calstate.policystat.com/policy/10926024/latest/>

- * Rights and Options for Victims of Sexual Misconduct, Dating and Domestic Violence and Stalking
- * Notice of Non-Discrimination
- * Myths and Facts about Sexual Violence
- * Campus Title IX Coordinators Role and Responsibilities
- * Complaint Form
- * CSU System EO 1095 Systemwide Sex Discrimination, Sexual Harassment, Sexual Misconduct, Dating and domestic Violence, and Stalking Policy (6/23/15)³
<https://calstate.policystat.com/policy/10926024/latest/>
- * CSU System EO 1096 Policy and Procedures; Discrimination, Harassment, Retaliation, Sexual Misconduct, Dating and Domestic Violence and Stalking against Employees and Third Parties (8/24/21)
- * CSU System EO 1097 Systemwide Policy Prohibiting Discrimination, Harassment and Retaliation, Sexual Misconduct, Dating & Domestic Violence and Stalking Against Students and Procedures for Addressing (8/24/21)
- * CSUSM Title IX organization charts
- * Multiple letter templates from the CSUSM Title IX Office
- * California Faculty Association Collective Bargaining Agreement, Articles 17, 18, 19
<https://www.calstate.edu/csu-system/faculty-staff/labor-and-employee-relations/Pages/unit3-cfa.aspx>.
- * Review of redacted, relevant documents of confidential investigations conducted in three student:faculty complaints related to sex/gender misconduct⁴

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: ORGANIZATION

Observations: Currently the Title IX Office is a part of the Student Affairs Division at CSUSM. This organizational placement has many advantages based on the scope of important resources that are also part of the Student Affairs Division and the ease of access for these resources. For example, these important resources include the counseling center, access to victim advocates, connectivity to access and training opportunities for residence life, student organizations, and student government. While these resources would be available to the Title IX/DHR office wherever it is located organizationally, the connectivity of the Title IX/DHR office within the Student Affairs Division provides for a closer connection to those resources. The disadvantage of the Title IX/DHR Office being located in the Student Affairs Division is that the

³ The System adopted new policies and procedures on 1/2022

⁴ The purpose of review of the three student:faculty cases was to provide insight into the complexity of Title IX cases involving different factions of the community.

Title IX/DHR function is a compliance-based office that serves faculty, staff and students, unlike most other student affairs programs and operations in that Division that only serve students.

The current Title IX/DHR Office performs an important role for CSUSM and provides a welcoming and caring environment. However, the presence of the office as a part of other student-based offices and programs suggests an exclusivity of serving students only. Although the staff are well trained and dedicated to providing a high level of service to all constituents, the Title IX/DHR operation could benefit from a re-framing of the office with more emphasis on serving the entire CSUSM community while remaining in the Student Affairs Division.⁵

Best Practice Recommendations:

To more effectively position the Title IX Office to establish autonomy with the campus community to serve all members of the community without confusion I suggest consideration of the following.⁶

- * A best practice consideration would be for the Title IX/DHR operation to establish a clear identity for the office and the role of the Title IX Coordinator. This would require separation from other student affairs related job functions and role identifications for the Title IX Coordinator.
- * The Title IX Office should not include multiple student affairs-based operations, rather only oversight over other compliance based institutional harassment and discrimination policies and procedures. Additionally, the office title should appropriately reflect the scope of compliance oversight in addition to Title IX. For example, a typical office title may be “Office of Equity and Compliance and Title IX”, or “DHR and Title IX”. The office would be managed by the Title IX Coordinator as their only responsibility. This would enable the head of that office to oversee Title IX as well as other Discrimination, Harassment and Retaliation issues, and provide staffing in that office to address all forms of discrimination and harassment.
- * The first Title IX regulations, published in 1975, required each educational institution receiving federal funding to appoint a “Title IX Coordinator”. While the title of “coordinator” is often inconsistent with the significance of the role the individual performs, this title has remained a regulatory requirement for the individual providing oversight of the functions of the Title IX regulations since that time. The recent trend in the past five years has been to incorporate compliance with other civil rights laws for

⁵ For example, the Title IX website link for faculty and staff reflects requirements and resources as mandatory reporters but does not contain information that the Title IX Office is also a source of support for faculty and staff who wish to report discrimination or abuse as well.

⁶ A “best practice” is not a singular element, rather a best practice represents moving the delivery of service from the industry standard, and often from current excellent practices to ones that may further enhance the delivery of service to the community.

faculty, staff and students under the supervision of the Title IX Coordinator. Therefore, any shift in office name should reflect the broader compliance responsibilities of the individual who oversees that office while maintaining the title of Title IX Coordinator.⁷

- * There is no legal requirement for a specific reporting structure for the Title IX Office, although System policy requires the Title IX Coordinator report to a Vice President or higher but providing oversight for all discrimination-based policies for faculty, staff and students provides clarity to the community about the university official who is responsible for accepting all discrimination-based complaints and providing the appropriate resources and supportive measures. The Title IX Coordinator, with responsibility for DHR, should not also have primary oversight for other significant student-affairs based offices such as disability services and the counseling center. Providing administrative oversight of other student affairs functions, not only creates a tremendous workload, but also may pose a potential perception of a conflict of interest and create confusion regarding the mission of the office.
- * The Office of Civil Rights strongly suggests a “stand alone” office for the Title IX Coordinator.⁸ Ideally the Title IX Office, as a part of the university’s compliance with all forms of harassment, discrimination and retaliation based on protected status (the DHR function at CSUSM), should maintain a high-profile position answering to a senior administrative officer, with a dotted line to the president that would allow the Title IX Coordinator to bypass their direct supervisor on urgent/significant Title IX matters and address them directly to the President.
- * While the placement of the Title IX Office along with DHR functions is generally not ideally placed in student affairs since it is an office that serves the broader campus population not just students, many institutions do have this organizational placement. Given the organizational structure at CSUSM, placement of this office under the Vice President of Student Affairs, as is currently done, would be a workable arrangement, especially considering the many support services that exist within the Student Affairs Division that make providing supportive measures more efficient. Indeed, System policy allows for the Title IX/DHR operation to be housed within whatever division the CSUSM president deems

⁷ Many institutions utilize titles such as “Associate Vice President and Title IX Coordinator” or “Director of Equity and Compliance and Title IX Coordinator”, for example, to acknowledge the important role of the individual performing the compliance oversight while still maintaining the Title IX Coordinator title.

⁸ U.S. Dept of Education, Office of Civil Rights, April 24, 2015, Dear Colleague Letter from Assistant Secretary for Civil Rights Catherine E. Lhamon to school districts, colleges, and universities reminding them of their obligation to designate a Title IX coordinator. The Dear Colleague Letter is accompanied by a letter to Title IX coordinators that provides them with more information about their role and a Title IX resource guide that includes an overview of Title IX’s requirements with respect to several key issues.

appropriate, so long as the Title IX Coordinator reports to a Vice President or higher, as it currently done.

- * The Title IX operation within the Student Affairs Division will require additional outreach to CSUSM employees to ensure their comfort level reporting discrimination and harassment issues to the Title IX Office and assurance they will also receive appropriate supportive measures.⁹ Maintaining a stand-alone office, separate from other typical student affairs functions will be helpful in this placement. A best practice for the Title IX Coordinator is to have significant authority and contact with academic and administrative departments.¹⁰
- * A best practice recommendation would be to incorporate and reflect a focus on discrimination, harassment and retaliation for all protected classes as well as Title IX on the website as well as in published materials and in training operations. This will support campus' understanding of the Equity and Compliance and Title IX Office as the source to report all forms of discriminatory conduct.
- * Visibility and accessibility of the Title IX Office and staff are continuing important best practices. While the Title IX Coordinator and staff currently attend campus functions, conduct information sessions and provide information brochures to faculty, staff and students, it is important to continue to focus on visibility, autonomy, and the broad mission of the office.
- * A best practice recommendation for staffing and organization of a Title IX Office that also includes adjudication of other allegations of harassment, discrimination and retaliation of faculty, staff or students based on protected class should include:
 - * The Title IX Coordinator as a full-time role to oversee all harassment and discrimination allegations and Title IX compliance (see above for role details for the Title IX Coordinator). The Title IX Coordinator may also conduct investigations, however when this is done, there must be another trained designee to oversee the process and review the investigation report.
 - * A Case Manager to shepherd through the adjudication process for all harassment and discrimination cases, including Title IX cases; maintain contact with the parties; address issues as they arise; ensure timeliness; report status of cases to the Title IX Coordinator on a weekly basis (more frequently as issues arise). Case Managers must

⁹ This is one reason for a more distinct compliance-based office title

¹⁰ See Appendix A for a list of Title IX Coordinator responsibilities as identified by the Office of Civil Rights and recommended by ATIXA (the Association for Title IX Administrators)

be well trained in all elements of Title IX and may also serve to conduct investigations as needed.

- * At least one full-time trained investigator, whose sole responsibility is to conduct thorough, reliable and impartial investigations of Title IX and other discrimination, harassment and retaliation cases involving protected class.
- * An administrative assistant to maintain the operational elements of the office.
- * The Title IX Coordinator should consider developing an agreement with the Counseling Center to provide victim advocates from the Counseling Center to not only accompany Complainants to initial meetings with Complainants as they currently do, but also to work with the Complainant through the entire process if the Complainant desires.
- * A best practice recommendation would be to appoint departmental liaisons in the areas of Student Affairs, Academic Affairs, Human Resources and Athletics to serve as a part of the Title IX team. These individuals should serve in this role in addition to their regular positions. The designated liaisons in these critical areas can serve the Title IX/DHR to represent perspectives from their constituencies as a part of the Title IX team and as an important link to the Title IX program. This broad representation throughout the campus also contributes to expanding the visibility of Title IX. Designated departmental liaisons are generally not compensated for serving in this role unless they also provide additional services such as investigators or serve as a designee in the absence of the Title IX Coordinator, nor should it be a time-consuming obligation.

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: COMMUNICATION

Observations: While the Title IX Office does a good job of initial outreach and communication with the parties involved with a case, there are challenges with continuing up to date communication with the parties throughout the entire process, particularly once a case leaves the operational elements of the Title IX Office. The current procedures regarding student: employee matters following a finding by the Title IX Investigator, or in the future, a decision by a hearing officer or panel, involve an appeal opportunity to the System Chancellor's Office; sanctioning functions (if appropriate) through Academic Affairs; further sanction review through a *Skelly* process; and finally, involvement with the Faculty Collective Bargaining Agreement. The Title IX Coordinator does not have operational oversight of processes outside of the Title IX Office, but the law of Title IX and VAWA 304 requires the Title IX Coordinator (or designee) to provide ongoing communication with the parties throughout the process and appropriate notice of all decisions.

Best Practice Considerations for Communication Includes:

- * The initial outreach letter to a Complainant following a 3rd party report of a potential violation of Title IX or other allegation of harassment, discrimination or retaliation should be welcoming but brief and should either reference a subsequent communication that contains all the required notice elements from the Title IX regulations, or it should provide a link or attachments with these details in the original letter. Currently the initial outreach to an identified Complainant is the equivalent of three pages. Long letters (e-mails) are daunting, and students are more likely to respond to a personalized but brief outreach than to a long, detailed initial communication.
- * A best practice recommendation would be for the Title IX Office to develop a response letter to be sent to all 3rd party reporters, including mandatory reporters, when the Title IX office connects with the referred student or when the Title IX office reaches out to the referred student. This letter should reinforce to the mandatory reporter that the adjudication process is a confidential one and therefore additional information will not be shared by the Title IX office but explain (briefly) the steps of the process.
- * Title IX regulations and System policy require notice to the Complainant and Respondent of each action taken and each decision point in the entire process. A best practice recommendation is to implement a process to ensure this communication is provided simultaneously to each party and identify who will be the point-person to deliver decision information (generally this is the responsibility of the Title IX Coordinator).¹¹
- * The Title IX Office must maintain ongoing communication throughout the process with the Complainant and Respondent to ensure the parties are fully informed of the status of the proceedings. The university should consider developing a “communication protocol” with each individual who makes a complaint to clearly identify the degree of communication they desire with the Title IX Office (generally the Case Manager). This should include the desired frequency of communication to the individual by the Title IX Office and the method of communication (text, e-mail, call).
- * The exception would be if the individual desires to initiate the communication with the office on a regular basis rather than have the office initiate the contact. In this case the

¹¹ *Title IX regulations require notice to the parties of all final determinations; this includes all appeals and settlements.*

preferred method and timing of communication with each party should be documented with a specifically identified contact source number and name.

- * The Title IX Office must establish a method for how they will communicate decisions with each party. Parties should not be blindsided by opening an e-mail to learn about a finding or other information that may be upsetting or create anxiety, nor should they be fearful of opening their mail. Therefore, the Title IX Office should reach out to each party, using the party's preferred method of contact, and schedule an in-person meeting or zoom meeting to discuss critical decision points in the process, or alternatively notify the parties the time that a decision letter will be posted to their e-mail.

The CSUSM Title IX Web Site Represents a Best Practice

- * The CSUSM Title IX web site is outstanding and is one of the best I have reviewed in the country . The website has been created in such a way that it clearly leads someone through the process of telling them what they need to know when they need to know it rather than overwhelming them with information that may or may not address their current question or need.
- * CSUSM is to be commended for having a link to the Title IX page on the front page of the university's web site. This is a significant resource link and demonstrates the importance of this issue to those individuals who go to the university main page.
- * CSUSM recently added a personal message from the University President, Ellen Neufeldt. This message is delivered in an open and heartfelt way and is likely to have a very positive impact on the community. This best practice is one that other college and university Presidents should consider following. The support of Title IX from the highest administrative officer in the institution sends a powerful message.
<https://www.csusm.edu/title9/review-reform/index.html>.
- * Access to the Title IX web page can be enhanced by developing an expanded "key words" list that would direct an individual searching for information to the correct section of the web site.
- * The web site will need to more clearly identify that the services of the Office are for faculty, staff and students and identify ways in which the Office supports employees in addition to addressing employee's roles as mandatory reporters.

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: SUPPORTIVE MEASURES

Observations: At CSUSM, from an individual's first meeting with the Title IX Office they are provided individually designed supportive measures.¹² However, supportive measures must be modified and documented throughout the entire investigation and adjudication process to meet the needs of the parties most effectively. The Title IX Office uses Maxient data base and has recently implemented a process of documenting modifications and additions to supportive measures throughout the process for both parties.¹³

Best Practice Considerations for Supportive Measures Includes:¹⁴

- * A best practice recommendation is to ensure supportive measures are made available to anyone making a report, even if that individual is not making a formal complaint, and prior to an initial assessment to determine if the allegation falls under the Title IX rubric.
- * A best practice recommendation would be to create detailed documentation in the data base of the supportive measures provided to the party. This would include who implemented the support, the date the supportive measures were provided and any additional relevant details. This documentation demonstrates that the university did not engage in a deliberately indifferent response
- * The university should consider ensuring that supportive measures follow the parties through the process. When a case is moved from one administrative step to the next, the subsequent administrator of the next step of the process must be provided information about current supportive measures in place and inquire of the party if the current support measures remain effective or need to be modified. If additional measures or modification of supportive measures is required, that information must be shared with the Title IX Coordinator or designee¹⁵ to oversee the modification or implementation of new

¹² Supportive measures are non-disciplinary, non-punitive individualized services offered to either party as appropriate and as reasonably available without fee or charge before or after filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the recipient's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the recipient's educational environment, or deter sexual harassment.

¹³ Examples of supportive measure may include counseling support, medical assistance or referral, no-contact directives, academic intervention and support, safety-based support, interim action based on a violence risk assessment, are essential components of the Title IX process

¹⁴ Providing supportive measures to both the Complainant and the Respondent as appropriate.

¹⁵ This is the first reference to "or designee". One should assume when reading the recommendations for actions to be taken by the Title IX Coordinator throughout this document that these actions may be taken by an individual designated by the Title IX Coordinator to act on their behalf, i.e., a "designee"

supportive measures. This recommendation for modification or implementation of new supportive measures must be documented when recommended and when implemented.

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: TIMELINESS

Observations: A common issue gleaned from the multiple interviews is that the process takes too long for resolution, during which time the parties are further traumatized by the lack of information and length of time. While timing is a significant issue, the majority of the timing challenges are out of the control of the Title IX Coordinator. The Title IX Coordinator may alleviate some of the anxiety of the parties through intentional communication to the parties of the current status of the adjudication process, and to engage in ongoing communication with the parties to keep them informed of progress and timing.

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: DOCUMENTATION

Observations: There are multiple steps of the adjudication process involving Title IX cases, occurring within the Title IX Office and with other offices, both within CSUSM as well as the Chancellor's Office. The decision made at each of these steps must be documented and must be a comprehensive part of a student or employee's file. The Title IX Office is currently utilizing the Maxient data base for documentation and this must include all actions and decisions (and documentation of such) for each step of the process, even those that are conducted outside the Title IX Office. There is currently not a system for comprehensive documentation for each case.

Best Practice Considerations for Documentation Includes:

- * A best practice recommendation would be for the Title IX Coordinator to receive documentation of all decisions made in the Title IX process that occur external to the Title IX Office and enter that into the Maxient database.
- * The OCR guidance stresses the importance of recognizing pattern-based conduct (when a person's prior behavior may be used as an indicator of a current allegation based upon substantially similar elements of the prior conduct). A best practice is to maintain documentation of cases in sufficient in detail to assess if a reported conduct is substantially similar to prior conduct reported about an individual. Cumulative conduct may suggest predatory behavior and may be an indicator of future behavior and thus may be considered more serious than an isolated incident or singular incident.

RECOMMENDATIONS FOR BEST PRACTICE CONSIDERATIONS: CLARITY OF PROCESS

Observations: The grievance process related to a Title IX claim is complex and can be confusing to individuals who do not practice this work daily. Individuals interviewed expressed frustration with the complexity of the process and general lack of knowledge of the Title IX

Office and operation, which may impact referrals by mandatory reporters or reports by Complainants.

Best Practice Considerations for Clarity of Process Includes:

- * The Title IX Office maintains a robust amount of published information, including flow charts of the process, and maintains an outstanding web site, it is important to note that the Office does not control the complexity of the process, nor the complex implementation of it by the System. Therefore, a best practice would be to develop targeted strategies to inform and assist others outside the Title IX process administration to understand the process more fully by focusing on providing essential information to individuals who need specific information (such as mandatory reporters). This could include targeted mailings describing the process and including the flow charts and contact information.
- * A best practice recommendation for ensuring all the steps of the process are followed in a timely way would be to create a Checklist for each of the elements through the process which would be used by the Title IX Coordinator or Case Manager to maintain documentation of the progression of a case and documentation of the timing of each step to be entered into Maxient, which would also be beneficial when auditing the process for timeliness to determine where delays may exist.

APPENDIX A

BEST PRACTICES RECOMMENDATIONS FOR THE TITLE IX COORDINATOR ROLE

A best practice is for the Title IX Coordinator to have broad responsibility for oversight and accountability of the entire process from the initial report through the final determination of a case. The Title IX Coordinator responsibilities should include:¹⁶

- * Oversight of TIX compliance;
- * Supervision of staff and process;
- * Oversight of training and education;
- * Involvement with Policy development (since this is a system provided policy, the campus Title IX Coordinators should provide input and be appropriately trained);
- * Development and implementation of grievance procedures (again, this is established by the system, but management and implementation of the procedures must be coordinated by the Title IX Coordinator for the campus);
- * Oversight of the case management process;
- * Recruitment and training of campus advisors (those who will serve to advise either the Complainant or Respondent)
- * Provision of appropriate notice to the parties throughout the process, including the finding, the appeal and any CBA actions that follow the Title IX process;
- * Ensure Complainant is informed of actions throughout the process and ensure that all determinations (findings) include remedial considerations for the Complainant
- * Maintain accurate and thorough records and notes;
- * Serve as the key intake officer for notice, allegations, reports and formal complaints;
- * Conduct the initial assessment of a case to determine if it falls under Title IX or another policy;
- * Coordinate overlap of various student and employee grievance processes
- * Ensure promptness and effectiveness of grievance procedures;
- * Supervise investigations;
- * Review all investigation reports to ensure they are thorough, reliable and impartial;
- * Oversee informal resolution procedures
- * Inform key stakeholders as appropriate through the investigation and adjudication process;
- * Provide quarterly statistical update to the President (see attached example) update the President in a timely manner on all high profile or significant cases;

¹⁶ *The current Title IX Coordinator is currently performing many of these functions. This list is intended to represent a comprehensive identification of the broad scope of functions for which the Title IX Coordinator would have responsibility.*

- * Maintain up to date knowledge of federal TIX laws and state laws related to Title IX;
- * Navigate First Amendment issues involving expression and discrimination
- * Engage in involvement with campus prevention agenda;
- * Provide 504/ADA compliance, including appeals of accommodations and grievance related to harassment or discrimination (Note: this is not the disability services role, which should be a separate function under a different administrator)
- * Ensure compliance with final sanctions and remedies
- * Serve as the primary contact for government inquiries on Title IX/DHR matters