

Title IX Coordinator Training for Higher Education

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Title IX Coordinator

- “[A]t least one employee to coordinate [the school’s] efforts to comply with its responsibilities under [Title IX].”
- What does this entail?



1

Agenda



- **Part I:** Title IX Coordinator Administrative Duties
- **Part II:** The College’s Response Pre-Investigation
 - Reviewing and Analyzing the Allegations
 - Offering and Coordinating Supportive Measures
 - The Formal Complaint
- **Part III:** Grievance Procedure: Investigation and Beyond
 - Role in the Investigation
 - Coordinating Informal Resolution
 - Role at the Hearing
 - Notice of Appeal
 - Implementing Remedies

2

Although the information contained herein is considered accurate, it is not, nor should it be construed to be legal advice. If you have an individual problem or incident that involves a topic covered in this document, please seek a legal opinion that is based upon the facts of your particular case.

Part I: **Administrative Duties**



Required Postings / Notifications

- Name or title and contact information
 - Published on website, and handbook or catalog
- Respond to inquiries regarding application of Title IX
- Training materials

Monitoring

- Monitor students' participation in athletics and across academic fields to ensure that sex discrimination is not causing any disproportionate enrollment based on sex, or otherwise negatively affecting a student's access to equal educational opportunities
- Survey the school climate and coordinate the collection and analysis of information from that survey
- Promote an educational and employment environment which is free of sex discrimination and gender bias



5

Training and Planning

- Address patterns or systemic problems revealed by Title IX reports or complaints;
- Track Title IX-specific position vacancies to ensure appropriate staffing;
- Ensure that appropriate policies and procedures are in place for working with law enforcement and coordinating services with local victim advocacy organizations and services providers, including rape crisis centers.



6

Training



Provide adequate training to students, faculty, and staff on Title IX issues

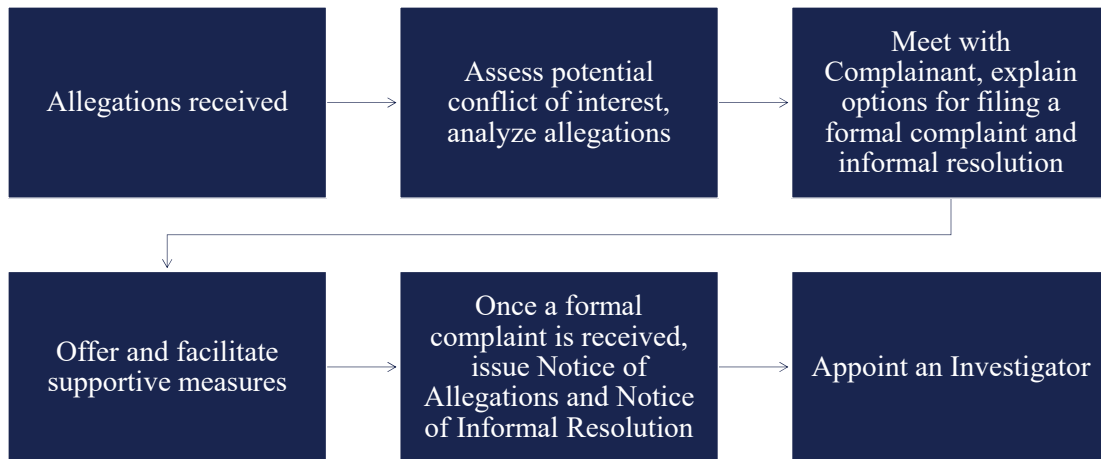


Maintain records of all such training

Title IX Complaints

- Maintain all documents and records related to Title IX responses for 7 years
- Appropriately analyze allegations of sexual harassment
- Conduct and oversee Title IX complaint responses
 - Partner with HR where employee involved
 - Coordinate supportive measures
 - Document outcome and implement remedies

Part II:
The College's Response
Pre-Investigation



Review and Analyze Allegations



Allegations

You are made
aware of
allegations of
sexual harassment.

Now what?

11

Identify Potential Conflict of Interest

- The Title IX regulations require that a Title IX Coordinator “...not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.”



Conflict of interest

12

Potential Conflict of Interest

- **Key question**: Does the Title IX Coordinator's prior or existing relationship with or knowledge of a party prevent the Title IX Coordinator from serving impartially?
- If yes: Recuse yourself
- Remember: A Title IX Coordinator's conflict of interest which affected the outcome is a permissible basis for appeal



13

Gather Information and Review Allegations

- Review the information you have
- Contact the Complainant (person alleged to be the victim) if you need more information
- Review the allegations



14

Analyze Allegations

- Upon reviewing allegations, analyze whether they should be processed under Title IX policy and procedures, or another policy
- **Tip**: Start with jurisdiction
- Analyze whether allegations (if true) would constitute sexual harassment under Title IX

Analyze Allegations: Jurisdiction



Analyze Allegations: Title IX Harassment

If true, do the allegations meet at least one of the
definitions of Title IX sexual harassment?

- 1 Quid Pro Quo Harassment
- 2 Hostile environment
- 3 Specific Acts (Sexual assault, dating violence, domestic violence, or stalking as defined by VAWA/Clery Act)

17

Analyze Allegations: Title IX Harassment

- 1 **Quid Pro Quo Harassment**
“My math professor offered extra credit if I sent him inappropriate sexual pictures of myself.”
- 2 **Hostile environment**
“My classmate frequently made sexual comments and gestures at me, both during and outside of class; I stopped going to class to avoid him.”
- 3 **Specific Acts:**
“The athletic trainer touched me in a sexual manner even though I told her to stop.”

18

Hypothetical

- You receive an email from a Psychology professor detailing a conversation they had with a student. The student, Alex, claimed that another student in the class, Sam, was making inappropriate sexual remarks in a private Zoom chat during a remote class session.
- Sam also allegedly messaged Alex on Instagram after class, and said, “Can’t wait till we are back on campus... I’ll have a seat saved for you, on my lap.”
- Should you process the allegations under Title IX?



19

Hypothetical

- A student, Charlie, comes to you to report that Professor X gave them a hug unexpectedly at an on-campus school sponsored event.
- Should you process the allegation under Title IX?



20

Analyze Allegations

If some or all of the allegations meet the Title IX jurisdiction and harassment threshold:

Schedule initial meeting with the Complainant

Issue [Notice Letter to Complainant of Policies Applicable to Investigation of Allegations of Sexual Harassment](#) for any allegations that do not meet Title IX requirements

If none of the allegations meet the Title IX threshold:

Issue [Notice Letter to Complainant of Policies Applicable to Investigation of Allegations of Sexual Harassment](#)

Follow applicable Policy and Procedures for investigating non-Title IX harassment

21

Formal Complaint



22

Meeting with Complainant

- Schedule a meeting with the Complainant
- Explain the potential courses of action
 - Formal Grievance Procedure
 - Informal Resolution*

**Remember that Informal Resolution is not available in student/staff claims*

Supportive Measures

- Supportive measures
 - Schedule changes, counseling, dorm reassignment, leaves of absence, assignment extensions, etc.
 - **Key**: Non-punitive towards Respondent



Coordinating Supportive Measures

- Contact appropriate personnel
 - Counselor, Registrar, etc.
- Make appropriate arrangements

Hypothetical

- Alex claimed that another student in the class, Sam, was making inappropriate sexual remarks in a private Zoom chat during a remote class session.
- Sam also allegedly messaged Alex on Instagram after class, and said, “Can’t wait till we are back on campus... I’ll have a seat saved for you, on my lap.”
- Do you need to offer supportive measures?
- If so, what types of supportive measures can you offer Alex?

Hypothetical

- A student, Charlie, comes to you to report that Professor X gave them a hug unexpectedly at an on-campus school sponsored event.
- Do you need to offer supportive measures?



27

Hypothetical

- Charlie calls you a week after visiting your office to tell you that Professor X asked for Charlie's cell phone number.
- Although Charlie said no, Professor X still was able to find the number and send Charlie a text asking, "Hey, dinner this weekend?"
- You re-evaluate the allegations and determine that this falls within Title IX jurisdiction.
- Do you need to offer supportive measures? If so, what?



28

Emergency Removals



- Individualized safety and risk analysis determines an immediate threat to the physical health or safety of any student or other individual arising from allegations.
- Applies to student Respondents
- Issue notice prior to removal
- Respondent must be allowed opportunity to challenge removal



29

Administrative Leave

- Applies to employee Respondents
- Administrative leave throughout pendency of a grievance process
- Check applicable CBAs
- **Caution:** Length of leave



30

Signing a Formal Complaint

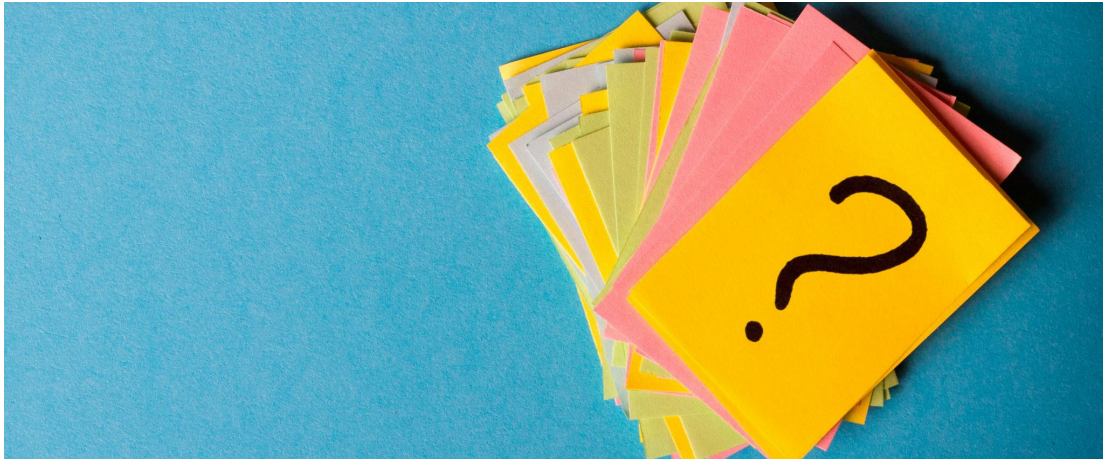
- Once a formal complaint has been signed by Complainant, issue:
 - Notice Letter to Complainant/Respondent of Complaint Allegations
 - Notice Letter Regarding Informal Resolution*
- Both parties should receive notices simultaneously
- *Remember that Informal Resolution is not available in student/staff claims*

No Formal Complaint Signed

- If a Complainant decides against signing a formal complaint, a Title IX Coordinator may sign a formal complaint on their behalf.
- Use caution when making this decision.

Part III:

Grievance Procedure: Investigation and Beyond



33

Role in Investigation



Investigator should be appointed following receipt of a signed Formal Complaint



Provide copies of any relevant documents



Maintain all notices sent by Investigator



Assist Investigator with witness and party contact and information

34

Role in Investigation



Stay apprised of all investigatory notices issued



Assign Advisor if party does not have one



Contact legal counsel if needed

Coordinating Informal Resolution

- Informal resolution is a detour in the formal grievance process
- If parties agree, issue Consent to Participate in Informal Resolution
- Coordinate with Informal Resolution Facilitator, set up date and time for Resolution



Returning to Grievance Process

- If a party withdraws consent, Informal Resolution Facilitator will refer complaint back to you
- At this time, process must be re-routed to wherever it was in the grievance process

Role Pre-Hearing

- Appoint Hearing Officer
- Coordinate schedules of all appropriate Title IX personnel and notify them of Hearing
- Schedule hearing



Role Pre-Hearing

- Send [Notice of Hearing, Final Investigation Report, and Right to File Response](#) to both parties at least 10 days prior to the hearing
- Appoint Advisor(s), if appropriate
- Notify legal counsel of attorney Advisor, if appropriate
- Attend the hearing

Post-Hearing Role

- Make audio or audiovisual recording available to parties for inspection and review upon request
- Facilitate communication between Hearing Officer and Investigation
- Provide any relevant documents



Appeals



Both parties have the right to appeal any determination regarding responsibility, and any dismissal of a formal complaint or allegations



Appeal must be submitted after party's receipt of written determination or dismissal notice

Appeals

- Appeal should be based on one or more of the following grounds:
 - Procedural irregularity occurred
 - New evidence or information exists that could affect the outcome
 - Title IX Coordinator, Investigator, or Hearing Officer had a conflict of interest or bias that affected the outcome of the matter
 - Sanction is disproportionate with the violation

Appeals

- Upon receipt of an appeal request, Title IX Coordinator should promptly forward the appeal request to Appeals Determination Officer.
- Issue [Notice of Appeal](#) to party that did not submit request for appeal.

Implementing Remedies

- Once a determination has been reached, and any timely appeals have been resolved, the Title IX Coordinator is responsible for implementing remedies;
- The Title IX Coordinator is also responsible for coordinating sanctions; include coordinating disciplinary action with the appropriate individuals, initiating the removal process for a club, adjusting class schedules, etc.

Frequently Asked Questions



FAQ



What training do employees need if they don't have a Title IX role?



What information do I need to publish online/in handbooks?



47

Contact Us



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48



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PRACTICE AREAS

Board Governance
Education
Labor & Employment
Litigation

EDUCATION

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ADMITTED TO PRACTICE

U.S. Court of Appeals
for the Seventh Circuit

U.S. District Court for
the Northern District of
Illinois

Supreme Court of
Illinois

Kevin P. Noll's practice focuses in the area of labor and employment law. Kevin counsels school districts, community colleges, libraries, park districts and municipalities with issues involving employee discipline, internal investigations, employee leaves of absences, and alleged discrimination and harassment claims. Kevin also defends clients in litigation and administrative charges in federal and state court, the U.S. Equal Employment Opportunity Commission, the Illinois Department of Human Rights, and the Illinois Department of Labor. In addition to his experience in labor and employment law, Kevin has trained school districts and community colleges pursuant to Title IX of the Education Amendments Act of 1972.

As an attorney, Kevin strives to cut through complexity to provide clients with practical answers and pragmatic solutions.

Beyond his legal work, Kevin's interests include golf and spending quality time with family and friends.

Recognitions

Illinois Emerging Lawyers

Illinois "Rising Star," by Super Lawyers Magazine

Publications

Contributing author, "Employee Discrimination," *Illinois School Law: Personnel and Student Issues*, IICLE (2021, 2024)

"OSHA Pauses Vaccination and Testing ETS Following Legal Challenges," *Employment and Labor Law Flashpoints*, IICLE (2021)

"NLRB Takes New Look at Charter Schools," *Chicago Daily Law Bulletin* (2019)

Presentations

Collective Bargaining/Contract Negotiations: Best Practice Strategies and Trends, ISDLAF+ School Finance Seminar (January 2026)

Federal Reform Initiatives: Updates and Guidance, Illinois Council of Community College Presidents Annual Retreat (October 2025)



ORGANIZATIONS

Chicago Bar Association

Illinois State Bar
Association

LEADERSHIP

Higher Education Team
Leader

Calculating Overtime & FLSA Update, Illinois ASBO Bookkeepers Conference (March 2025)

Addressing Employee Mental Health Conditions, IAPD/IPRA Soaring to New Heights Conference (January 2025)

Hiring Employees in an Age of New Regulations: Salary and other Job Posting Requirements, Application and Interview Do's and Don'ts, Background Screening Parameters, and More, IAPD Legal Symposium (November 2024)

Benefit or Burden: Navigating Ever-Expanding Employee Leave Rules, IAPD Legal Symposium (November 2023)

Managing Employee Leave Rights Under the FMLA, ADA, and Illinois Law, IAPD/IPRA Soaring to New Heights Conference (January 2023)

Best Practices for Responding to Harassment and Discrimination Complaints, IAPD/IPRA Soaring to New Heights Conference (January 2023)





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Education
Employee Benefits
Labor & Employment
Litigation
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Student Rights

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B.A., University of
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ADMITTED TO PRACTICE

Supreme Court of
Illinois

Elizabeth (Liz) J. Becker focuses her practice on labor and employment, education, student rights, and board governance. She advises educational and public-sector employers on workplace investigations, discipline, and campus climate issues, and helps institutions align their policies, contracts, and handbooks with complex federal and state regulations, including Title IX, Title VII, the ADA, and the FMLA.

Before entering private practice, Liz built a career in higher education administration, association governance, and public service. Her roles with the National Panhellenic Conference, the NCAA, and a congressional district office provided her with a strong understanding of governance and compliance, as well as community expectations in educational and nonprofit settings. This experience shapes her practical, relationship-focused approach to client advising and sensitive investigations.

Liz earned her J.D. from Loyola University Chicago School of Law, where she took on leadership roles as Managing Editor of the Loyola University Chicago Law Journal and as a member of the Deans' Advisory Committee. She also holds a master's degree in Postsecondary Administration and Student Affairs from the USC Rossier School of Education and a B.A. in Political Science and History from the University of California, Davis.

Liz is a long-time fraternity/sorority volunteer and serves in leadership roles with Kappa Alpha Theta Fraternity, supporting collegiate chapters on policy, governance, and student leadership development. Outside of work and volunteering, she enjoys walking her dog along the Chicago lakefront and following Formula One racing. Despite living in the Midwest for a decade, this native Californian will never adjust to Chicago winters.

Presentations

Navigating Payroll Laws, Illinois ASBO Bookkeepers Conference (March 2026)



ORGANIZATIONS

Illinois State Bar
Association

Women's Bar Association
of Illinois

LEADERSHIP

Kappa Alpha Theta
Fraternity, Vice President

