

Title IX Policy Sexual Harassment

Training for Title IX Roles

Your role, your decisions, your documentation — from first report through appeal.

September 2026

2020 Title IX Regulations

SECTION 1

Title IX Overview

In this section, you will:

- Understand what Title IX protects and who it covers
- Identify the four decision-making roles and who holds each
- Apply the standards that bind every role in every case
- Use the policy's defined terms precisely in writing
- Understand the steps involved in a Title IX case

What is Title IX and How It Applies

Title IX prohibits sex discrimination in any education program or activity of the School.

What the law protects

- Equal access to education, free of sex discrimination
- Sexual Harassment is a form of prohibited sex discrimination
- Applies to students and employees alike

Why we are covered

- Applies to any school receiving federal financial assistance
- No exception for trade or technical schools

Where it applies

- School education programs and activities
- On campus and certain off-campus activities
- Where STEG exercises control over the program or activity

Not every allegation of sex discrimination is sexual harassment

Sex discrimination is the broader category. Sexual harassment is one form of sex discrimination. The nature of the allegation determines how the School responds and which process applies.

Definitions That Drive Every Decision

Sexual Harassment means conduct on the basis of sex, against a person in the United States, that is:

Quid pro quo

- An employee of the School conditions an aid, benefit, or service on participation in unwelcome sexual conduct
- One incident is enough

OR

Hostile environment

- Unwelcome conduct a reasonable person finds *severe, pervasive, AND objectively offensive*
- Effectively denies equal access to the program or activity

OR

Specific Offenses

- These each dictate required written notices
- **Sexual Assault** — sexual act without consent
- **Dating Violence** — abuse by a romantic partner
- **Domestic Violence** — abuse within a household
- **Stalking** — repeated conduct causing fear

Practice point: apply these definitions at intake. They determine whether the matter proceeds under Title IX or is dismissed and routed to the Student Code of Conduct or HR review process.

Title IX Roles and Responsibilities

Four decision-making roles, kept separate — with Compliance and HR supporting all of them.

- 1 Title IX Coordinator — Campus Director of Education**
Receives reports, arranges supportive measures, and manages the case file.
- 2 Investigator – Campus President or corporate designee**
Gathers evidence, interviews parties and witnesses, writes the investigative reports.
- 3 Hearing Official — Corporate Education, or designee**
Runs the live hearing and issues the Written Determination.
- 4 Appeals Officer — Senior Vice President of Campus Operations, or designee**
Decides appeals of a determination or dismissal; the decision is final.
- + Officials with Authority**
Assistant Director titles/levels and above. Their knowledge counts as notice to STEG; they must promptly report concerns to the campus Title IX Coordinator rather than investigating.
- + Compliance and HR — support and oversight**
Advises on policy, monitors timelines, training, and recordkeeping.

Investigator, Hearing, and Appeals assignments effective post-Conduit approval. Designees are permissible

Ongoing Obligations for Every Role



Never deliberately indifferent

Respond promptly and in a way that is not clearly unreasonable.



No prejudice, conflict, or bias

No prejudging the facts; training may not rely on sex stereotypes.



Respondents are presumed not responsible

The presumption holds until a determination is issued at the end of the process.



Communicate with both parties simultaneously, where required

Same notices, same evidence, same deadlines, in writing.



Complete required role training and post training materials online

Training materials are published on the School website; records kept seven years.



Monitor and address any report of retaliation

Retaliation is prohibited; report it to the Campus President and Coordinator to address separately.

Vocabulary You Will Use Daily

Use these terms precisely — in emails, notices, and your case file.

Report	Any notice of alleged Sexual Harassment. Anyone may make one, at any time, by any means.
Formal Title IX Complaint	A signed, written document filed by the Complainant or signed by you that starts the grievance process.
Complainant / Respondent	The person alleged to be the victim; the person alleged to have committed the conduct. Respondent is presumed not responsible.
Supportive Measures	Non-disciplinary, non-punitive, no-cost services to restore or preserve equal access.
Remedies	Post-determination measures for the Complainant; unlike supportive measures, they may burden the Respondent.
Officials with Authority	All individuals at Assistant Director level or higher. They must report incidents to the Title IX Coordinator.

The Title IX Process, Start to Finish (1 of 2)

1 Receive and Document the Report

Listen, document the basic facts, avoid investigating, and do not promise confidentiality.

2 Contact the complainant

Explain the Coordinator's role, discuss supportive measures available. Making a report does not equal filing a formal complaint

3 Address safety and supportive measures

Assess immediate safety needs. Put appropriate measures in place regardless of whether a formal complaint is filed.

4 Assess whether the conduct may fall under Title IX

Determine whether the conduct could fall within the Title IX policy and whether STEG has jurisdiction

5 Ask the complainant what they want to do

Options include file a Formal Title IX complaint or resolve informally. Document decision and continue supportive measures

6 Initiate the formal Title IX grievance process

Obtain signed formal complaint. Contact Compliance for guidance.

7 Issue the Notice of Allegations

Notify both parties of the allegations, their rights, the process, and the assigned investigator.

8 Determine whether informal resolution is available

If permitted, appropriate, and both parties voluntarily agree in writing, pause the formal grievance process and proceed with informal resolution. If not, continue to investigation.

9 Conduct the investigation

Interview parties and witnesses, gather relevant evidence, and give both parties an equal opportunity to provide evidence and identify witnesses.

Target: conclude the Formal Resolution Process within 120 days of filing.

The Title IX Process, Start to Finish (2 of 2)

10 Issue the Preliminary Investigative Report
Provide the report to both parties and allow the required review and 10 day response period.

11 Review responses and finalize investigation
The investigator considers party responses, continues investigations if needed.

12 Issue the Final Investigative Report
Provide the completed report to both parties and their advisors at least 10 days before the hearing.

13 Notice and and conduct the hearing
Send written notice of the hearing with time to prepare, confirm advisors and witnesses, and have the Hearing Official conduct the live hearing.

14 Issue the Written Determination
The Hearing Official determines responsibility and sends the written decision to both parties using the preponderance of the evidence standard.

15 Complete the appeal process
Either party has 10 days to appeal on the grounds permitted by policy. With no appeal, the determination becomes final when the appeal period expires.

16 Finalize and implement the outcome
Apply any remedies, sanctions, supportive measures, or other required actions.

17 Close and retain the case
Document the final disposition, confirm required actions are complete, address ongoing retaliation concerns, and retain the record for the required period.

Target: conclude the Formal Resolution Process within 120 days of filing.

SECTION 2

Title IX Coordinator

In this section, you will:

- Learn the step-by step-process in coordinating a Title IX case
- Conduct initial contact and issue required written notification
- Coordinate supportive measures and evaluate emergency removal
- Move a Formal Complaint onto the formal or informal resolution path

Title IX Coordinator – Director of Education

Title IX prohibits sex discrimination in any education program or activity of the School.

Title IX Coordinator Role

- Title IX Coordinator = Director of Education at each campus
- Also serves as Informal Resolution Facilitator
- A designee may act in your place

What you own

- Receiving the Report
- Implementing supportive measures and remedies
- Communicating with the parties
- Overseeing the School's response
- Documenting the process

The standard you are held to: never deliberately indifferent.

Respond promptly and in a way that is not clearly unreasonable in light of the known circumstances — and document why your response met that bar.

Title IX Coordinator Role – Initial Report

1

Receive and document each report.

Document the information received, including the parties involved, alleged conduct, date and location if known, and how the report was received.

2

Identify immediate safety

Identify any immediate safety concerns and determine whether supportive measures or other prompt actions are needed.

3

Contact complainant

Promptly contact the complainant to explain the Title IX Coordinator's role, discuss supportive measures, and arrange an initial meeting.

Provide a copy of the Title IX policy

4

Meet with the Complainant

Understand the conduct being reported, discuss the complainant's needs and desired resolution, explain available options, and explain how to file a formal complaint. Do not investigate credibility at this stage.

Consider the Complainant's wishes, but the decision to initiate the grievance process remains yours when safety requires it (consult Compliance).

Title IX Coordinator Role - Determine the Path

5

Assess Title IX applicability

Determine whether the allegations, if true, fall within the scope of the Title IX Policy and whether the requirements for proceeding under the formal Title IX grievance process are met.

6

Determine appropriate path

Determine whether the matter should proceed under Title IX or be referred to another process, such as Student Code of Conduct, HR, or another nondiscrimination or grievance process. Contact HR and Compliance for support

7

Intake or refer the matter

If a formal complaint is filed by the complainant (*or signed by the Title IX Coordinator), initiate the formal Title IX grievance process. If Title IX does not apply or a formal grievance process is not initiated, route the matter to the appropriate institutional process.

8

Document and communicate next steps

Document the assessment, determination, rationale, supportive measures, and referral or action taken, and communicate the applicable next steps to the complainant.

****Consider the Complainant's wishes, but in exceptional situations, the Coordinator may choose to escalate to a formal complaint regardless.***

Specific Offenses Require Written Notifications

When the Report involves Sexual Assault, Dating Violence, Domestic Violence, or Stalking, you must provide these in writing.

- **Available supportive measures** Written notification of what the School can put in place.
- **Campus and community resources** Counseling, health, mental health, victim advocacy, legal assistance referrals, visa/immigration assistance, financial aid
- **Rights and options** A written list of rights and options for victims of sexual violence, other available victim services.
- **Law enforcement options** Information on involving campus security and local law enforcement — plus your offer to help make contact.
- **Protective orders** Options for obtaining a protective order, where relevant.

Contacting law enforcement is not required. Say so explicitly, and record that you offered assistance.

Coordinating Supportive Measures

Supportive Measures are non-disciplinary, non-punitive, individualized, and free of charge for either party.

Examples (case-by-case)

- Community referrals
- Schedule and academic accommodations
- Mutual no-contact restrictions
- Escorts and increased security
- Limits on extracurricular activities
- Monitoring of areas of campus

How you implement them

- Coordinate with the depts that must deliver them
- Available before, after, or without a Formal Complaint
- Restore access to education without unreasonably burdening the other party
- Keep them confidential unless confidentiality blocks delivery
- Document what was offered, accepted, or declined

If you provide no supportive measures, document why that was not clearly unreasonable.

Anonymous Complainant? Work with them to deliver measures confidentially and reassess whether safety requires you to sign a Formal Complaint.

From Formal Complaint to a Resolution Path

After a formal complaint is filed, the Title IX Coordinator will determine how the case proceeds.

Formal Complaint Filed

- Starts the Title IX grievance process
- Written statement to the Title IX Coordinator by any means
- Must carry the Complainant's (or Title IX Coord) physical or digital signature
- Alleges conduct that could constitute sexual harassment under the Title IX Policy
- You may sign it yourself to avoid deliberate indifference
- Cases may be consolidated if related

Mandatory Dismissal

- Ends the Title IX process
- Conduct does not constitute Sexual Harassment under the policy
- Alleged conduct did not occur in the school's education program or activity
- Alleged conduct did not occur against a person in the US

Discretionary Dismissal

- Complaint withdraws formal complaint in writing
- Respondent is no longer enrolled or employed by school
- Circumstances prevent gathering evidence sufficient to reach a determination

For any dismissal, send written notice to both parties that includes the reason(s), their right to appeal, and a reminder that other formal grievance policies and the code of conduct may still apply

The Informal Resolution Process

An alternative to the formal path — Title IX Coordinator can facilitate it, but both parties must choose it freely.

How you run it

- Facilitated by Title IX Coordinator - offered any time before a determination
- Never available where an employee allegedly harassed a student
- Both parties must give voluntary, informed, written consent
- Written notice must cover allegations, requirements, withdrawal rights, and records kept
- A signed resolution ends the formal path for those allegations
- Target: conclude within 30 days, extendable for good cause

Either party may withdraw their agreement to informal resolution and resume the formal process at any time before signing a resolution.

Notice of Allegations

Title IX Coordinator sends written notice to the known parties before any initial interview with the Investigator.

Notice of Allegations must include

- The grievance process and whether informal resolution is available
- The allegations with known details: identities, conduct, date, location
- That the Respondent is presumed not responsible until the determination
- The right to an advisor of choice, who may be an attorney
- Equal opportunity to inspect and review directly related evidence
- The Code of Conduct provision on knowingly false statements

Investigating new allegations later? Send an updated notice to the known parties.

SECTION 3

Investigator

In this section, you will:

- Conduct a thorough, impartial, and prompt investigation
- Interview parties and witnesses with proper notice and consent
- Manage evidence, relevance, and the investigation file
- Issue the preliminary and final investigative reports on schedule

Investigator Foundations

Who investigates

- The Investigator is the Corporate Director of Education or a trained designee
- Staff or a contracted outside investigator may serve — never the Coordinator or the Hearing Official
- Thorough, impartial, and prompt handling in every case
- No conflict of interest or bias toward Complainants or Respondents

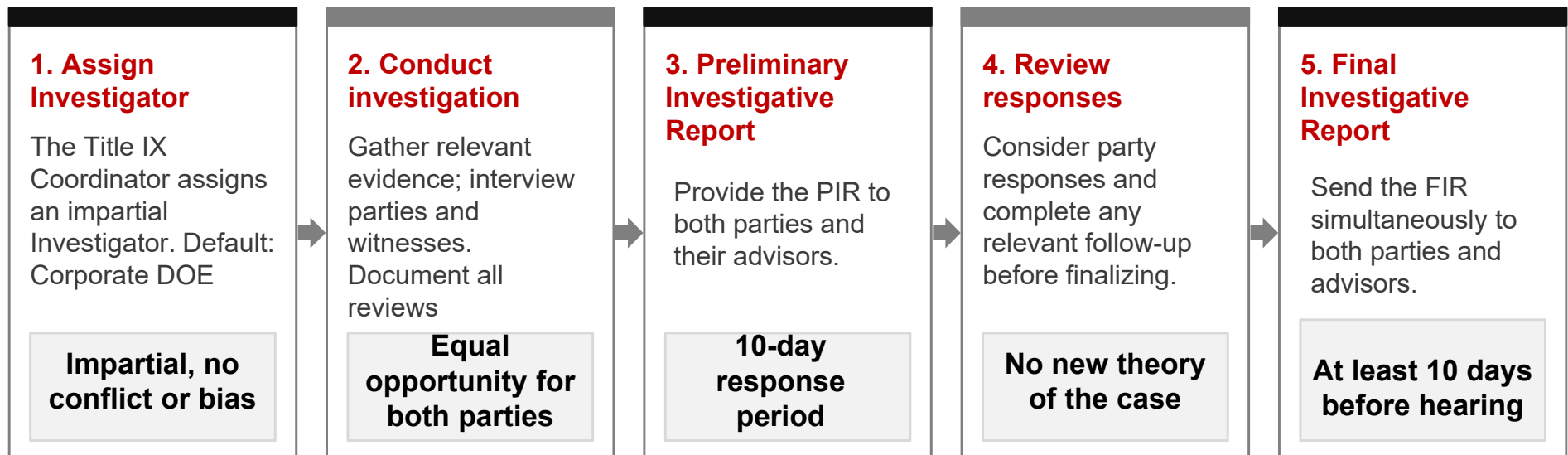
Where the burden sits

- The burden of proof and of gathering evidence rests on the School, never on the parties
- The School gathers evidence sufficient to reach a determination regarding responsibility
- Parties may speak freely about the allegations and gather their own evidence
- The School will not restrict either party from discussing the case

Investigators must be trained on the definition of Sexual Harassment, the scope of the School's education program, the grievance process, relevance, and the Specific Offenses. Training materials must promote impartial investigation and may not rely on sex stereotypes.

The Investigation – an Overview

From assignment of the Investigator to the Final Investigative Report.



The Investigator does not decide responsibility — the completed record goes to the Hearing Official.

Conducting Investigative Interviews

Every interview follows the same notice-and-preparation discipline.

1

Send written notice before every interview or meeting

Give date, time, location, participants, purpose — and time to prepare.

2

Give both parties equal opportunity to present witnesses

Fact and expert witnesses alike, for Complainant and Respondent.

3

Accept inculpatory and exculpatory evidence from any source

Take evidence that cuts both ways, whoever it comes from.

4

Treatment records require voluntary, written consent

Don't review medical, counseling, or psychological records without consent.

5

Communicate with both parties simultaneously, in writing

Coordinator and Investigator update both sides in parallel, in writing.

Managing Evidence and the Investigation File

What you collect, how you weigh it, and how you keep the case moving.

Test for relevance

Gather broadly, then keep only what bears on the allegations and set the rest aside

Never rely on stereotypes

Weigh evidence on the facts alone, not on assumptions about either party

Stay independent of police

Pause only while law enforcement gathers evidence, then resume promptly

1

New Allegations Require an Amended Notice of Allegations

If you uncover conduct outside the original notice, tell the Coordinator to issue an amended Notice before investigating it.

2

Build the Investigation File as You Go

Interview notes, evidence, notices, and party responses belong in one dated file. The School retains it for seven years.

Issuing the Preliminary Investigative Report (PIR)

Before you conclude, both sides see everything directly related to the allegations.

1

Send the directly related evidence to each party

Deliver to the party and their advisor, in electronic format or hard copy.

2

Include evidence the School does not intend to rely on

All of it — inculpatory and exculpatory, from any source.

3

Deliver to both sides simultaneously

Neither party gets an earlier look or a longer window than the other.

4

Give at least 10 days for a written response

The response period runs before the investigation concludes, not after.

5

Do not draw conclusions yet

Evidence first; findings and relevance calls come after responses.

Final Investigative Report (FIR)

The last stage: consider what came back, close any gaps, and write the report.

1

Review and consider every response to the PIR received

When the 10-day window closes, weigh what each party submitted.

2

Conduct follow-up investigation where the responses require it

Re-interview, collect more evidence, or notice new allegations.

3

Write a report that fairly summarizes the relevant evidence

Summarize relevant evidence — not every document, not your verdict.

4

Issue it at least 10 days before the hearing

Sent simultaneously to both parties and their advisors for response.

5

Forward the FIR and Formal Complaint to the Hearing Official

The Hearing Official, never the Investigator, decides responsibility.

SECTION 4

Hearing Official

In this section, you will:

- Prepare and convene a compliant live hearing
- Control the order of questioning and rule on relevance
- Apply the cross-examination and evidence limits correctly
- Issue a Written Determination that meets every content requirement

Hearing Official

The Hearing Process at a Glance

- 1 Final Investigative Report issued at least 10 days before the hearing**
Both parties and their advisors respond in writing before you convene.
- 2 The Coordinator sends written notice of the hearing**
Date, time, location, participants, and purpose, with time to prepare. Assign advisors, where necessary
- 3 Convene the live hearing**
Same room, separate rooms, or virtual — all parties must see and hear live hearing.
- 4 Advisors cross-examine and Hearing Official rules on relevance**
You decide relevance before any answer and explain each exclusion.
- 5 Issue the Written Determination**
Preponderance of the evidence, to both parties simultaneously.

Preparing to Convene the Hearing

The Hearing Official is the Campus President or Vice President — never the Coordinator or Investigator.

Before the hearing

- Confirm the Final Investigative Report was issued at least 10 days in advance
- Confirm the written notice states date, time, location, participants, and purpose
- Confirm each party has an advisor; the School appoints one at no cost if a party has none
- Set the format: same room, separate rooms, or virtual with everyone able to see and hear

Impartiality and preparation

- No conflict of interest or bias for or against Complainants or Respondents
- Complete required training on the grievance process, relevance, and hearing technology
- Never preside over a case you coordinated, investigated, or dismissed
- Review the report and the directly related evidence before the parties arrive

Create an audio or audiovisual recording, or a transcript, and make it available to both parties for inspection and review. The record belongs in the case file, which the School retains for seven years.

Running the Hearing: Order of Questioning

Follow this run of show — advisors ask all cross-examination questions.

Suggested order of questioning

- Open by stating allegations, introducing participants, discuss decorum, and advise it is recording
- Complainant testifies; Respondent's advisor cross-examines
- Respondent testifies; Complainant's advisor cross-examines
- Witnesses testify: Complainant's first, then Respondent's
- Hearing Official may recall anyone, ask its own questions, then close

Cross-examination options

- Advisors ask every question — parties never question each other
- Questions are direct, oral, and in real time
- No advisor? The School appoints one at no cost
- Same room, separate rooms, or virtual — all must see and hear
- Refusal to answer carries no adverse inference

Rule on relevance before every answer, and explain any exclusion — each witness is cross-examined by the other party's advisor.

What “Testifying” Means in a Hearing

A party’s account on the record — not sworn courtroom testimony.

Speaking on the record

- The party gives their account aloud, in real time, while the hearing is recorded or transcribed

Answering questions

- Hearing Official may question first
- Cross-examination by the other party’s advisor

No oath required

- This is an administrative proceeding under School policy, not a deposition

Participation is voluntary

A party or witness may decline to appear or refuse to answer — no inference of policy violation follows.

Cross-Examination and Relevance

You rule on relevance before any question is answered, and you explain every exclusion.

Advisors ask, not parties

- Cross-examination is direct, oral, and in real time, by each party's advisor

Rule first, then answer

- Say whether a question is relevant before it is answered, and explain exclusions

Off limits

- Sexual predisposition and prior sexual behavior, and privileged information

1

Two narrow exceptions on prior sexual behavior

Evidence that someone other than the Respondent did it, or prior incidents with the Respondent offered to prove consent.

2

No inference from absence or refusal to answer

Draw no inference about responsibility from a party's absence or refusal to answer cross-examination.

Issuing the Written Determination

Apply the preponderance of the evidence standard and issue the determination to both parties simultaneously.

What it must contain

- The allegations
- The procedural steps taken from Formal Complaint through determination
- Findings of fact, and conclusions applying School policy to those facts
- The result and rationale for each allegation, plus sanctions and appeal rights

Standard, sanctions, and finality

- Decide by preponderance of the evidence — more likely than not
- Final when the appeal period closes or the appeal decision issues

Issue it to both parties simultaneously, with information on how to appeal. Provide it to the Title IX Coordinator, who oversees implementation of remedies; the file is retained for seven years.

SECTION 5

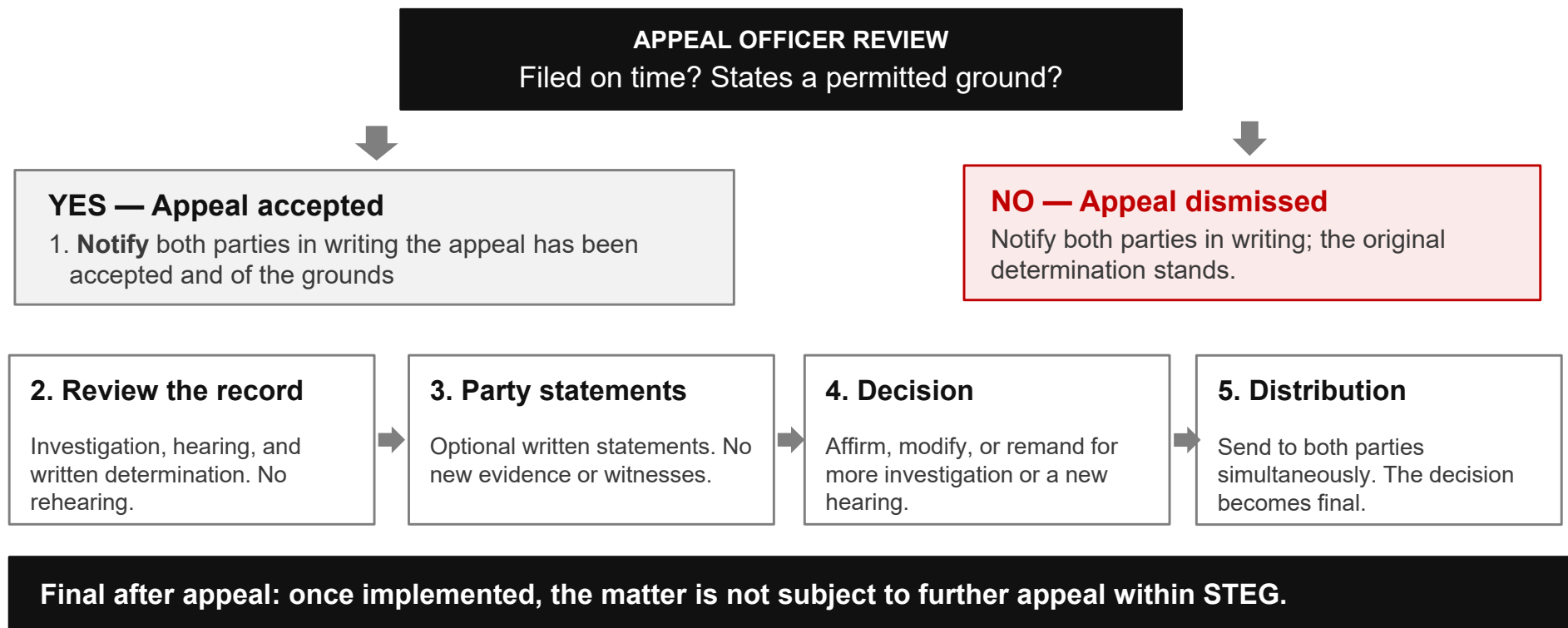
Appeals Officer

In this section, you will:

- Confirm the appeal is timely and rests on a qualifying ground
- Give both parties their written statement opportunity
- Review the record without rehearing the case
- Issue a final written decision to both parties simultaneously

The Appeal Process at a Glance

From the appeal request to a final, non-appealable outcome.



Appeals Officer – **SVP of Campus Operations**

Both parties may appeal a final Written Determination or a case dismissal on three grounds only.

Procedural irregularity

- A process error that affected the outcome of the matter

New evidence

- Not reasonably available at the time, and could affect the outcome

Conflict or bias

- By the Coordinator, Investigator, or Hearing Official — affecting the outcome

Either Party Submits Notice of Appeal within 10 days of Determination, stating the basis

Coordinator notifies the other party in writing; that party has 20 days from receipt to submit a written statement of appeal.

Appeals Officer decides – Affirm, Modify, or Remand decision

Never the Hearing Official, Investigator, dismissing official, or Title IX Coordinator. Review the record; do not rehear the case. Written decision to both parties simultaneously, typically within 10 days of the statement deadline. Final.

Issuing the Appeal Decision

Decide in writing, explain your reasoning, and issue to both parties simultaneously.

What the decision must do

- Address each ground the appealing party raised
- State the result for each ground, with the rationale
- Say whether the ground affected the outcome, and what follows from that
- Issue it in writing to both parties simultaneously

Timing and finality

- Typically within 10 days of the statement deadline
- The decision is final — there is no further level of appeal
- Notify the Coordinator so sanctions and remedies are implemented
- The complete appeal record is retained for seven years

The Appeals Officer is the Senior Vice President of Campus Operations — never the Hearing Official, Investigator, dismissing official, or Title IX Coordinator.

What Good Implementation Looks Like

Take these five habits back to your campus.

- | | | |
|----------|------------------------------------|---|
| 1 | Respond, don't wait | Prompt contact, prompt supportive measures, prompt notice. |
| 2 | Communicate in parallel | Notices and decisions go to both parties simultaneously and in writing. |
| 3 | Stay in your lane | Coordinator, Investigator, Hearing Official, and Appeals Officer are four distinct roles, trained annually. |
| 4 | Protect against retaliation | Report retaliation immediately; it carries sanctions of its own. Protect privacy and only share as necessary |
| 5 | Document for seven years | Investigations, determinations, recordings, appeals, informal resolutions, supportive measures, and training materials. |

Questions on applying this policy to a live matter? Contact the Office of Compliance before you act.

STEG TITLE IX POLICY — ROLE-BASED TRAINING

Thank You

Questions?

Direct questions about the policy or your role to the Title IX Coordinator or the Office of Compliance.

Sources Referenced

Every requirement in this training traces to one of these sources.

STEG Title IX Policy

StrataTech Education Group, Title IX Policy, October 1 2026. Primary source for STEG roles, definitions, procedures, and timelines.

34 C.F.R. § 106.45(b)(1)(iii) — Title IX Personnel Training

Federal requirements for training Title IX Coordinators, Investigators, decision-makers, and informal resolution facilitators, including impartiality, relevance, hearing technology, and investigative reports.

34 C.F.R. § 106.45(b)(10) — Training Materials & Recordkeeping

Requires public availability of Title IX training materials and retention of required Title IX records for seven years.

34 C.F.R. § 668.46(k)(2)(ii) — Clery/VAWA Annual Training

Requires annual training for officials who conduct disciplinary proceedings involving Dating Violence, Domestic Violence, Sexual Assault, or Stalking.

85 Fed. Reg. 30026 (May 19, 2020) — 2020 Title IX Final Rule

U.S. Department of Education final rule establishing the Title IX grievance process and role-based training requirements.

U.S. Department of Education, Office for Civil Rights

Current Title IX regulations, guidance, and resources for educational institutions.

For the slide itself, I would use **this version instead of the existing reference page**. It makes the important distinction between the **Title IX role-training requirements** and the **Clery/VAWA annual-training requirement**, which is especially important given what you're telling the audience during Slide 5.