

Toolkit

# How to Gather Information About a School District's Title IX Policies

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# Introduction

This guide helps students and adult allies gather information about how a school district protects students from sexual harassment. It is intended to raise awareness and empower communities to make change. It's designed for one or more individuals interviewing one Title IX Coordinator.

Title IX Coordinators are a school district's primary resource for identifying sex discrimination, including sexual harassment. They help resolve grievances and train school staff on gender equity. They play a critical role in ensuring schools take proactive steps in complying with Title IX.

Title IX is a federal civil rights law. It prohibits all educational institutions (public and private) that receive federal money (such as from the U.S. Department of Education or the Department of Agriculture) from discriminating against students on the basis of sex. Sexual harassment/assault can be forms of sex discrimination when they limit or prevent a student from participating in and benefiting from a school's educational program.

This guide contains many questions to educate the public about K-12 sexual harassment and the role of the Title IX Coordinator. Move quickly through the questions and, if necessary, schedule a follow up interview. If conducting the interview as an individual, you may want to proceed immediately to "Before the Meeting" below.

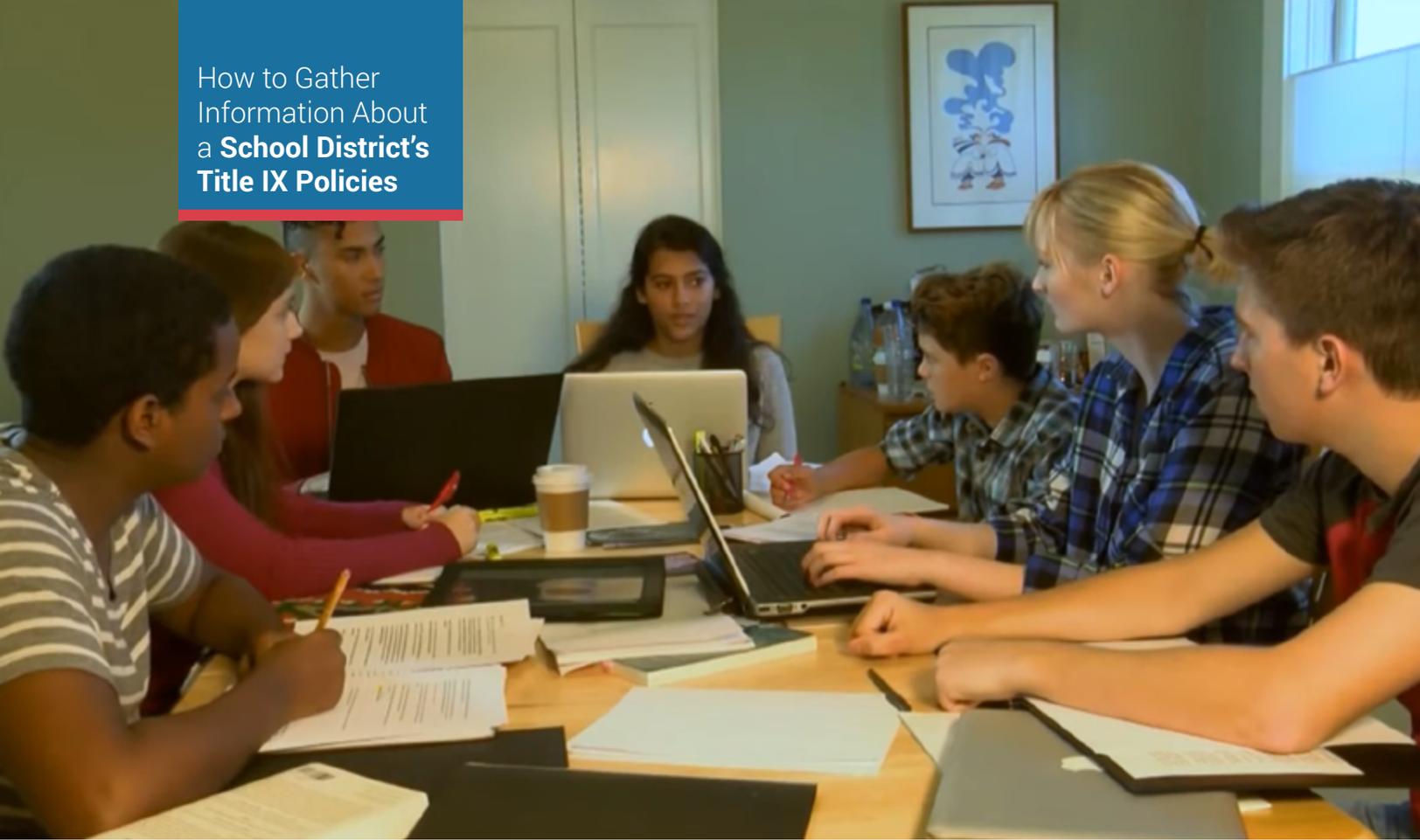


## How to get started

- Email Title IX Coordinator and set appointment time. Use email **template #1** and **template #2**.
- Download and send out **interview questions** to all participants EXCEPT the Title IX Coordinator.
- Send out Zoom invite (if virtual interview) to all participants and again the day before interview. Call Coordinator's office to make certain the interview is proceeding.
- Make certain *everyone* takes notes (on their computers) on the entire meeting using the **interview questions** document and replies alongside each question.
- Collect notes from all participants.

# Identifying participants: The Title IX Coordinator and community allies

- Find out the name of the school district Title IX Coordinator
  - Search the district's website ([list of school districts in the United States](#))
  - If the Title IX Coordinator's contact information does not appear on the website call the district office
  - If there's no Title IX Coordinator or if unknown, call the principal of a school in the district that you wish to investigate
  - Make sure to get the Title IX Coordinator or principal's phone number for a reminder call.
- Note whether the Title IX Coordinator's information was clearly visible on the district's website. Or did it take several steps to find the Coordinator? Note if you couldn't locate the Title IX Coordinator at all. Track the steps you took to identify this person and add this information to your report.
- Try to include students and allies in the district you're investigating by contacting gender equity clubs, GSAs, parent groups, sexual assault response organizations, YWCA or other youth advocacy organizations. By engaging local stakeholders, you'll both educate the community and create allies for change. If you can't identify local allies, include friends from any location so that they can learn about how schools should address sexual harassment. Use email [template #3](#) and [template #4](#) to conduct outreach.



## How to contact the Title IX Coordinator (or Principal)

- Use the email **template #1** (and **template #2** if needed) to invite the district Title IX Coordinator or other administrator you want to interview. Do NOT send that person this questionnaire.
- Schedule a meeting time for 60 minutes. *Send the meeting invitation to all participants promptly.*
- Call the Coordinator's or Principal's office the day before the interview to remind them of the interview and time.

# Before the meeting

- Watch this **short video** explaining why knowledge of Title IX is important.
- Watch this **short video** of a Title IX Coordinator helping a parent whose children have been sexually harassed at school.
- Share this guide as a PDF with all the people conducting the interview but **NOT** with the person being interviewed. It's important that their responses be spontaneous and unrehearsed.
- Make sure that all participants have downloaded the **interview questions** document to take notes on using their computers.
- Review the questions in this guide.
- Prepare any additional questions which may be specific to the school district you're investigating, for example about cases you've heard about in the district.
- Write down the name of the person interviewed, their title, and all other positions they occupy in the district.



## At the meeting

- Ask permission to record (in some locations it is illegal to record someone without their permission). Anyone who does not want to be recorded should turn off their camera.
- Ask the questions in the checklist and move through them fairly rapidly. If the person being interviewed is uncertain about an answer, move on. After answering questions from the list, ask any other questions you may have.
- Announce the question number before asking it so that anyone taking notes can follow and write the response.

# General questions and outreach to school community

- 1 What is your title, and do you hold other positions other than Title IX Coordinator? If so, what other positions do you hold and what are your job titles?
- 2 In your view, which of the following does Title IX include: athletics, pregnant or parenting students, sexual harassment, sexual assault?
- 3 What does the district currently do to promote gender equity in the classroom and in school activities?
- 4 How do you educate students about gender stereotypes, sex discrimination, and sexual harassment?
- 5 How does the district protect students from sexual harassment?
- 6 Does the district take particular steps to protect LGBTQ students?
- 7 How do you school educate staff about handling sexual harassment and/or assault complaints?

## General questions and outreach to school community

- 8 How are you addressing online sexual harassment during virtual classes? What steps are you taking to educate families and protect students from online harassment?
- 9 What outreach regarding sexual harassment, students' rights and schools' responsibilities do you perform for students and parents? Do you regularly provide information on addressing harassment, and if so, how often?
- 10 Do you do any of the following:
  - Hold listening sessions with students
  - Provide students with information in newsletters
  - Talk with the parent-teacher organization
  - Speak with students at assemblies
  - Implement informational campaigns
- 11 Is information on reporting sexual misconduct readily available, and if so, where?
- 12 Does the school conduct climate surveys to learn about students' experience of sexual harassment? If so, how often?

# General questions and outreach to school community

## Reporting

- 13 Does each school have a designated person who takes reports of sexual harassment? Does that person have a special title? How do students know where to find this person?
- 14 Does the school resource officer have a role in taking a complaint?
- 15 When taking a report do you offer the reporting student and the alleged harasser the opportunity to have a parent or advocate present?
- 16 Do you require both the reporting student and the alleged harasser to meet together to “work it out?”
- 17 How do you respond to concerns that the reporting experience was not fair or safe for the harassed student?
- 18 If students are retaliated against after reporting a sexual assault, what should they do?
- 19 If students are sexually harassed repeatedly by teachers or staff, what should they do if their school fails to take action?

# General questions and outreach to school community

## Investigation

- 20 Who conducts the Title IX investigation in your district? Law enforcement? The principal? The legal department?
- 21 Do you wait for law enforcement to complete its investigation before conducting your own investigation?
- 22 What steps do you personally take to oversee a Title IX investigation?
- 23 How do you determine whether sexual harassment falls under the new Title IX Rule?
- 24 If you determine that the harassment or assault doesn't rise to the level that triggers a Title IX investigation, what options do you offer? For example, do you offer alternate complaint procedures, safety plans for the student reporting harassment, etc.? If the student says the harassment is impacting their education, will you make accommodations regardless of whether you believe the harassment is "severe, pervasive, and objectively offensive"?
- 25 Do you give a redacted copy of the investigation report to the reporting student and alleged harasser? (Redacted means personal identifying information removed.)
- 26 How do you decide what supportive measures to offer to reporting students?

# General questions and outreach to school community

## Staff Training

- 27 How often do you train school staff? How do you educate new employees who join the school during the year? How do you know if new staff actually take online training about Title IX?
- 28 How does your district educate staff about handling sexual harassment and/or assault complaints including sexual harassment of LGBTQ and gender- nonconforming students?
- 29 How do you train staff on how to prevent and address retaliation against a student who reports sexual harassment?
- 30 Do you post your Title IX training materials? If not, why not? (This is a requirement of the new Title IX regulations.)

## Data collection

- 31 How do you distinguish sexual harassment from bullying?
- 32 How do you collect data on reported sexual harassment and where do you report it?
- 33 Do you make data on reported sexual harassment publicly available? If so where and how often? Do you report this data to state and federal agencies?
- 34 How do you use data to evaluate the effectiveness of your sexual harassment policies?

# General questions and outreach to school community

## Optional questions

- 1** Which of the following behaviors constitute sexual harassment:
  - Comments about not looking or behaving like a stereotypical boy or girl
  - Sexual gestures and sounds
  - Non-verbal sexual behaviors
  - Verbal harassment related to gender or sexual orientation
- 2** Can sexual harassment and assault between students of the same sex occur in the earliest grades, or do you believe inappropriate touching at a young age is not sexualized?
- 3** Because the new Title IX rule requires that the harassment be “severe, pervasive, and objectively offensive,” before you can conduct a Title IX investigation, how do you determine which behaviors meet this standard for students ranging from kindergarten to high school? For example, being constantly harassed for not looking like a stereotypical boy could meet that standard for some students.
- 4** Because the new Title IX rule excludes off-campus sexual harassment and assault, what would you do if a student is harassed/assaulted off campus and the victim can't attend school with their harasser owing to trauma and a hostile environment that results from the harassment or assault?
- 5** What do you do about sexual assault hazing by sports team members that occurs off campus?
- 6** Students have resorted to Instagram or information posted in the bathroom to expose sexual harassment. Please comment on why students do not feel they can get help from school administrators.

# After the meeting

## Evaluate or debrief if more than one participant

- 1 What challenges did you face in setting up an interview?
- 2 What were your impressions of the interview? What stood out to you?
- 3 What deficits did you find (e.g., lack of comprehensive, understandable, accessible sexual misconduct policy; little or no staff training, person interviewed seemed uncertain or uninformed, etc.)?
- 4 Did the person interviewed speak of students as only boys/girls or use gender inclusive terminology?
- 5 Did you get the impression that the person interviewed gave a public relations presentation to try to demonstrate that the district is doing a good job?
- 6 What suggestions do you have for improving the Title IX Coordinator's role (or the role of the person interviewed)?
- 7 What suggestions do you have for this school community?

# After the meeting

## Write a report and additional activities

- Summarize your findings.
- List questions that could be a part of a follow up email to the district.
- List recommendations for change.
- Outline a possible activism campaign for implementing recommendations.
- Identify allies for change (students, clubs, parents, community organizations).
- Identify school administration/community organizations who could improve the visibility and clarity of school policies.
- Offer to connect allies/other interview participants with SSAIS to create a task force to improve the existing response protocols.
- Ask SSAIS for help if needed. For example, you may want to request information on sexual harassment data but are unsure of how to obtain it.
- Send the thank-you email **template #5** to the person interviewed. Include any questions that you are unclear about, asking for written answers.
- You're welcome to send a video of the interview, checklist, any participants' notes, and report to SSAIS at **info@stopsexualassaultinschools.org**.

# Email Templates

**Email #1: Student requesting interview.** May be adapted to phone call if no response.

Dear [Title IX Coordinator's name, or if unavailable, school principal, or person responsible for taking Title IX complaints],

I am a student in [name of state or in our district] researching how Title IX works in K-12 schools. I would like to schedule a meeting of approximately 60 minutes, either in person or by Zoom. I would like to invite a few others who are also interested in learning more about Title IX.

Could we meet in two or three weeks? I would appreciate it if you could provide a few possible days/times, preferably after school.

I look forward to hearing from you and appreciate your help.

Sincerely,

**Email #1: Adult (not student) requesting interview.**  
May be adapted to phone call if no response.

Dear [Title IX Coordinator's name, or if unavailable, school principal, or person responsible for taking Title IX complaints],

I am researching how Title IX works in K-12 schools. I would like to schedule a meeting of approximately 60 minutes, either in person or by Zoom. I would like to invite a few others who are also interested in learning more about Title IX.

Could we meet in two or three weeks? I would appreciate it if you could provide a few possible days/times, preferably after school.

I look forward to hearing from you and appreciate your help!

Sincerely,

**Email #2: if no response to email #1 within 5 days [for use by student or nonstudent].** May be adapted to phone call if no response.

Dear [name],

I'm following up on my earlier email to schedule a meeting.

As I mentioned, I am researching how Title IX works in K-12 schools. I would like to schedule a meeting of approximately 60 minutes, either in person or by Zoom. I would like to invite a few others who are also interested in learning more about Title IX.

Could we meet in two or three weeks? I would appreciate it if you could provide a few possible days/times, preferably after school.

I look forward to hearing from you and appreciate your help!

Sincerely,

## Email #3: inviting community organizations to participate in the interview

Dear [name of organization or responsible person],

I am requesting your participation in a project to explore gender equity in our local K-12 school districts. I will be conducting interviews with Title IX Coordinators. Community organizations play a crucial role in ensuring students' rights to an education free from sex discrimination. I hope you will join me for an interview of approximately 60 minutes.

Please feel free to share this with members of your organization. I would also appreciate knowing of other individuals or organizations in the region who might be interested in participating.

I am looking forward to hearing from you and appreciate your help!

Sincerely,

## **Email #4: inviting school clubs to participate in the interview. (May need to send more than once to the same group)**

Hello [GSA, gender equity club, etc.],

I'm a student in [state] looking into the ways school districts address gender equity, Title IX, and sexual harassment. I'd like to invite members of your club (and/or interested friends) to participate in a Zoom interview with your district's Title IX Coordinator.

I'd also appreciate it if you could share this invitation with other students, clubs, or community allies who might be interested and have them contact me for more information. Even if they aren't able to participate in our upcoming interview, they can participate in future interviews and help us spread awareness about these issues. I'm creating a network of activists who want to improve the school environment—whether on-site or online—and would like to work with allies in your area.

Let me know if you're interested!

Sincerely,

## Email #5: thank you for participating/more information needed

Dear [name],

Thank you for participating in our interview. After reviewing my notes, I've listed a few more questions that I hope you can answer. Please answer alongside each question:

[Provide a numbered list of questions with a space between each question]

I would greatly appreciate it if you would provide me with the names of school staff, counsellors, clubs, and others who are interested in promoting gender equity in the district.

Many thanks for your help.

Sincerely,

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## Links referenced

**Email template #1:** from student requesting interview

**Email template #1:** from adult (not student) requesting interview

**Email template #2:** if no response to email #1 within 5 days  
[for use by student or nonstudent]

**Email template #3:** inviting community organizations to  
participate in the interview

**Email template #4:** inviting school clubs and peers to participate  
in the interview

**Email template #5:** thank you for participating/more information  
needed

**Interview questions** for notetaking during meeting: download to  
your computer

# Stop Sexual Assault in Schools

- [Stop Sexual Assault in Schools Website](#)
- [SSAIS YouTube](#)
- [Instagram](#)
- Email [info@stopsexualassaultinschools.org](mailto:info@stopsexualassaultinschools.org)

