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RECORDKEEPING UNDER TITLE IX

October 2026



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ABOUT US

OUR MISSION

To provide the best Care and Support for our clients, Community Partners, employees, contractors, collaborators, vendors, and all others who encounter our company.

GOAL

To assist schools and districts in providing a safe and healthy learning and working environment for students, faculty, and staff.



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BEFORE WE GET STARTED...

- Not legal advice
- Materials
- Questions
- Breaks
- Posting link
- No recording

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IF A SCHOOL DIDN'T DOCUMENT ITS REPONSE, IT MAY STRUGGLE TO DEMONSTRATE COMPLIANCE.

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WHY DOCUMENTATION MATTERS

Memphis-Shelby County Schools: Of 88 student-to-student incidents OCR selected for review, the district could only produce 22 files. Most of those were missing witness statements, investigative outcomes, or any indication an investigation occurred at all. For other cases, all OCR could find was data pulled from a discipline-tracking system — not actual case files.

Paterson, NJ: OCR found incomplete files and inconsistencies across reports, with staff relying on notes from their phones or saved emails instead of a complete case file. OCR specifically said case files need to show who filed the report, a description of the incident, witness and party interview statements, outcomes, and notice of any disciplinary measures.

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CONTINUED . . .

Alpine School District: OCR flagged not just incomplete records, but also inconsistencies across records related to sexual assault cases, compounded by a Title IX Coordinator who was barely involved in the district's response to 92 reported sexual assaults.

Val Verde USD: The district failed to provide written notice of outcomes to parties and their parents, failed to offer or document interim/supportive measures, and gave procedural rights (like evidence review and timeline-extension notices) to complainants but not respondents — undue process that shows up clearly in the paper trail.

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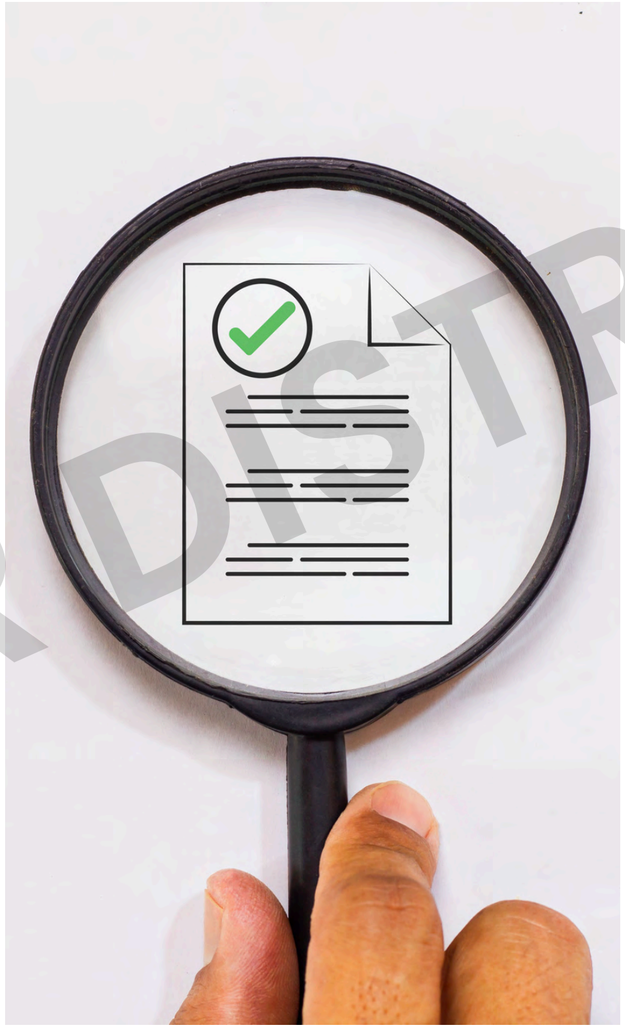
THE ENFORCEMENT LANDSCAPE: DOCUMENTATION MATTERS MORE THAN EVER

Directed Investigations

OCR is initiating more investigations without an individual complaint, including thorough reviews of institutional data and reported practices

OCR and DOJ Coordination

Recent interagency agreements and enforcement initiatives underscore the potential for coordinated federal scrutiny



Records Tell the Story

Agencies may examine complaint files, investigative records, supportive measures, etc.

Beyond Individual Complaints

Documentation can reveal patterns, inconsistent practices, or systematic compliance concerns

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CORE PRINCIPLE



- If it is important enough to influence a decision, it should be documented.
- If it does not support a decision, compliance requirement, or investigative finding, consider whether it belongs in the file.

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DOCUMENTATION RISK AREAS

Under-Documentation	Over-Documentation

• No record of supportive measures offered
• Missing witness outreach
• Missing rationale for emergency removal
• No explanation of investigative decisions
• Risk:
  ◦ Inability to defend decisions
  ◦ Due process concerns
  ◦ OCR findings
  ◦ Litigation exposure
	• Recording rumors
	• Including irrelevant sexual history
	• Including irrelevant medical information
	• Recording personal opinions
	• Risk:
	  ◦ FERPA violations
	  ◦ Privacy concerns
	  ◦ Credibility issues
	  ◦ Discovery problems during litigation

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DOCUMENTATION GOLDEN RULES

- Document:
  - Facts
  - Actions taken
  - Dates
  - Times
  - Evidence reviewed
  - Decisions made
  - Rationale for decisions
- Do Not Document:
  - Speculation
  - Assumptions
  - Character judgments
  - Gossip
  - Unverified opinions
  - Irrelevant personal information



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DOCUMENTATION FRAMEWORK:

1. Intake
2. Supportive Measures
3. Initial Evaluation
4. Evidence Collection
5. Interviews
6. Findings
7. Resolution
8. Case Closure



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INTAKE, TRIAGE, & SUPPORTIVE MEASURES



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LET'S PRACTICE . . . INTAKE



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CLOSER LOOK: INTAKE

- Who reported?
- When was it reported?
- When did it happen?
- Where did it happen?
- What happened? Who was there?
- Even if you don’t have the information, document that you don’t have the information.
- Jurisdiction analysis - why school has or does not have
- Referral decisions
- Any urgent safety issues

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THINGS TO AVOID:

- Assumptions
- Character Judgments
- Speculation

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LET'S PRACTICE . . . SUPPORTIVE MEASURES



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CLOSER LOOK: DOCUMENTING SUPPORTIVE MEASURES

Institutions must document:

- The supportive measures offered - what, when, to whom
- What was accepted and effective dates
- What was refused and reason for refusal
- If none provided, why not
- Even if a Complainant declines measures, document the offer
- Follow-up communication

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EMERGENCY REMOVAL DOCUMENTATION MUST INCLUDE:

- Risk Analysis
  - Specific behaviors
  - Threat assessment factors
  - Safety concerns
- Justification
  - Why removal is necessary
  - Why lesser interventions were insufficient
- Appeal Documentation
  - Appeal request
  - Review process
  - Outcome

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CLOSER LOOK: INITIAL EVALUATION

- Records reviewed
  - Guardian
  - Aspen
  - Prior complaints
  - Discipline history (if relevant and permitted)

- Consider
  - Bias or conflict of interest concerns
  - Not creating character evidence

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WHERE ARE WE?

1. Report Made
2. Intake
3. Supportive Measures Offered
4. Emergency Removal? Safety Concerns?
5. Initial Evaluation
6. Case Assigned or Referred Out



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LET'S PRACTICE . . . FORMAL COMPLAINT



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FORMAL COMPLAINT

Does the Complaint identify the following:

- Who
- What
- When
- Where



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NOTICE OF ALLEGATIONS (NOA)

- Does the NOA need to specifically identify the allegation as "Title IX"?
- Can the NOA include other violations?
- Review:
  - Current regulations
  - Notice requirements



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REVISED NOTICE OF ALLEGATIONS

What should be included:

- New information received
- Date discovered
- Date amended
- Notice sent



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INVESTIGATION DOCUMENTATION AND INTERVIEW RECORDS



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WHAT'S IN YOUR INVESTIGATION FILE?



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CLOSER LOOK:

- What must be in the investigation file?
  - Evidence gathered
  - Interview summaries
  - Evidence review access confirmation
  - Notice of allegations
  - Written determination
  - Rationale for each finding

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WHAT'S NOT IN YOUR INVESTIGATION FILE?

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REPRESENTATION DOCUMENTATION

When attorneys, advisors, or union representatives are involved:

Document:

- Representation status
- Date notified
- Communications
- Participation

Do not document:

- Personal impressions

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INTERVIEW DOCUMENTATION

Capture:

- Relevant facts
- Dates, participants, location
- Clarifications
- Material observations
- Avoid:
  - Editorial comments
  - Personal impressions



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INVESTIGATIVE CONSULTS WITH THIRD PARTIES

- Special focus on:
  - Developmental considerations
  - Age-appropriate behavior analysis
  - Referral decisions
  - Supportive measures
- Document:
  - Questions asked
  - Observations relevant to assessment
  - Consultations with leadership
- Avoid:
  - Diagnosing behavior
  - Speculating about trauma



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CREDIBILITY DOCUMENTATION

- Inconsistencies
- Corroboration
- Reliability factors
- Do Not Document:
  - Personal opinions
  - Assumptions



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DOCUMENTING CREDIBILITY

Acceptable:

- "The Complainant's statement was corroborated by video footage and by Witness Smith, who was present in the cafeteria."

Not Acceptable:

- "The witness appeared honest."

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THIS OR THAT?

Litigation Considerations



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Jordan seemed defensive during the entire investigation. He was not able to look the investigator in the eye and seemed nervous while discussing the incident.

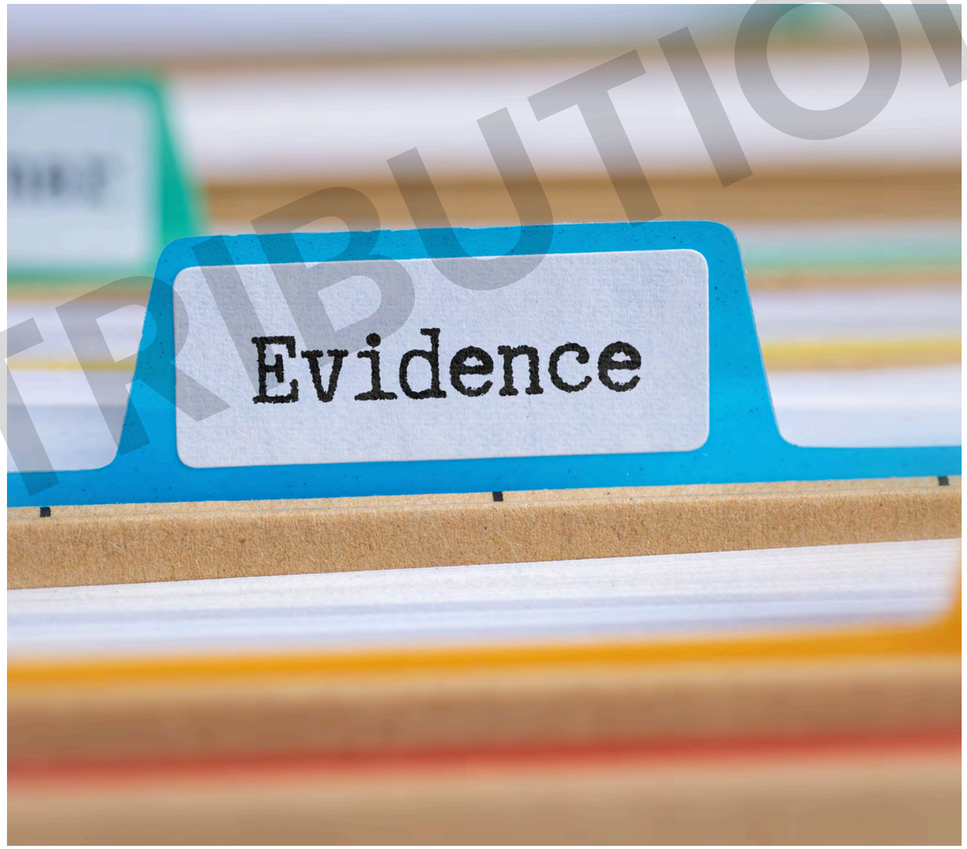
Maya was emotional and not able to fully answer the questions until she composed herself. She paused the interview to collect herself and take some medication for anxiety.



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EVIDENCE MANAGEMENT AND SENSITIVE INFORMATION



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EVIDENCE TRACKING MUST DOCUMENT:

- Source
- Date received
- Relevance
- Storage location

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EVIDENCE SHARING

- Document:
  - What was shared
  - With whom
  - Why
  - Date
- Pay special attention to:
  - Dating violence cases
  - Safety-related disclosures



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LET'S PRACTICE . . .
EVIDENCE LOG



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SENSITIVE INFORMATION

- FERPA
- Disability
- Pregnancy
- Medical information
- Prior allegations

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DO NOT document



Sexual History Rules

- To prove someone other than the respondent is responsible?
- To show pattern of behavior?
- To prove consent?



Only document when legally relevant and permitted

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SEXUAL ORIENTATION AND GENDER IDENTITY CONSIDERATIONS

Document only when necessary to:

- Explain allegations
- Explain bias motivation
- Explain Title IX relevance
- Never include information that could unnecessarily "out" a student



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IEP AND 504 INFORMATION IS IT RELEVANT?

Relevant examples:

- Communication accommodations
- Interview accommodations
- Decision-making capacity concerns
- Not relevant:
  - Entire educational history

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THE OVERSHARING WITNESS:

- Medical information
- Counseling information
- Social media screenshots
- Do you: keep/redact/remove



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REDACTION PRINCIPLES



Remove:

- Irrelevant student identifiers
- Medical information
- Third-party information
- Protected educational information not needed

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COMMON INVESTIGATION DOCUMENTATION PITFALLS:

1. Keeping everything
2. Keeping too little
3. Personal email storage
4. Gaps in information
5. Duplicate files



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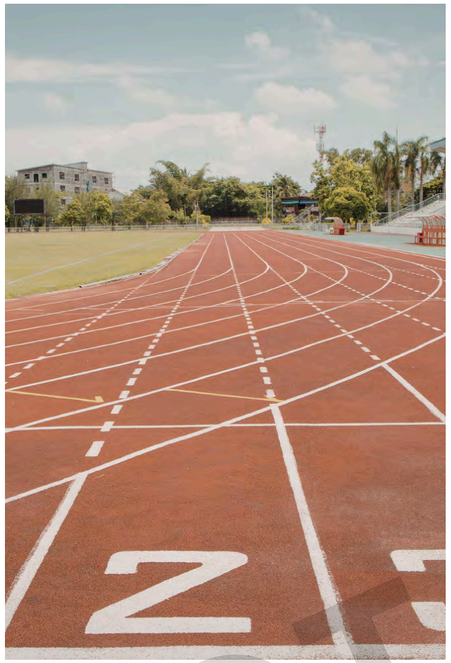
CLOSER LOOK: INFORMAL RESOLUTION DOCUMENTATION

- Must document:
  - Confirmation of voluntary participation
  - Written consent of both parties
  - Terms of resolution

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WHAT ABOUT NON-SEXUAL HARASSMENT COMPLAINTS?



- Title IX includes pregnancy discrimination, athletics, and equity issues.
- While 2020 regs focus on sexual harassment procedures, broader civil rights documentation still matters
  - Athletic equity reviews
  - Gender equity assessments
  - Pregnancy accommodation requests

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RECORDKEEPING 101



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WHAT THE REGULATIONS ACTUALLY REQUIRE

RETENTION REQUIREMENT

"A recipient must maintain for a period of seven years records of—
(i) Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required under paragraph (b)(6)(i) of this section, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to the recipient's education program or activity;
(ii) Any appeal and the result therefrom;
(iii) Any informal resolution and the result therefrom; and
(iv) All materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process."

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WHAT THE REGULATIONS ACTUALLY REQUIRE

SUPPORTIVE MEASURES DOCUMENTATION REQUIREMENT

Also within § 106.45(b)(10):
"For each response required under paragraph (b)(1) of this section, a recipient must create, and maintain for a period of seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment."

And further:
"If a recipient does not provide a complainant with supportive measures, then the recipient must document the reasons why such a response was not clearly unreasonable in light of the known circumstances."

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WHAT THE REGULATIONS ACTUALLY REQUIRE

WITHIN THE SAME SUBSECTION:

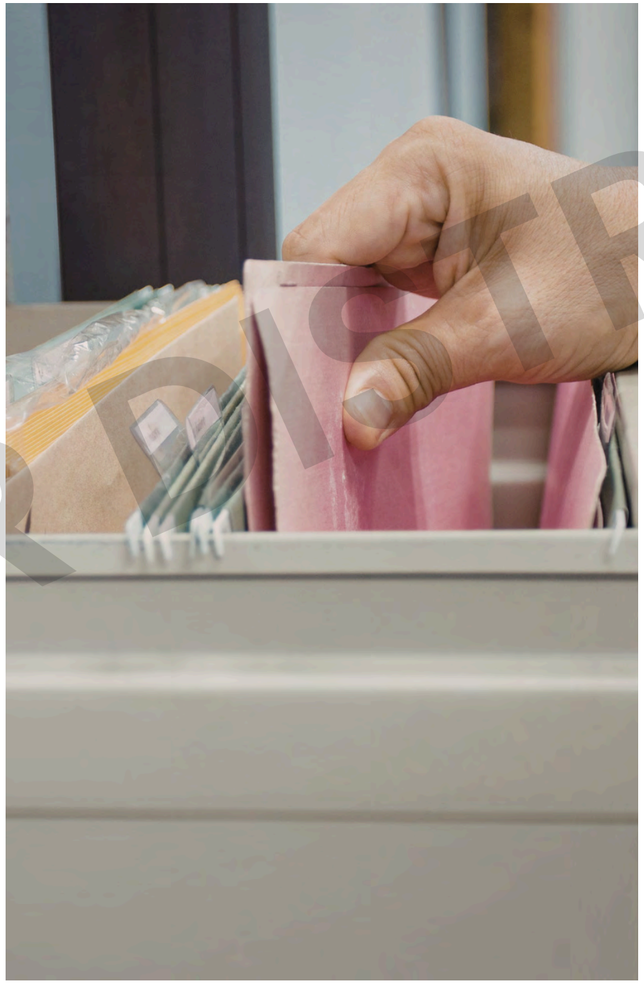
"A recipient must make these training materials publicly available on its website, or if the recipient does not maintain a website, available upon request for inspection by members of the public."

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SCHOOLS MUST MAINTAIN RECORDS FOR 7 YEARS OF:

1. All materials used to train Title IX personnel
2. Investigation files
3. Determination letters
4. Appeal records



5. Informal resolution documentation
6. Training materials
7. Records of supportive measures

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TRAINING MATERIALS

- Training Materials Must Be Public. Schools Must:
  - Maintain training materials
  - Post them publicly on website
  - Retain for 7 years

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COMMON RECORDKEEPING MISTAKES

- Where Schools Get in Trouble:
  - Not documenting supportive measure offers and revisit of those offers
  - Missing rationales in determinations
  - Overwriting digital files
  - Failing to retain and post training materials
  - Inconsistent file naming systems
  - Storing documentation in personal email accounts

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BEST PRACTICES FOR DEFENSIBLE DOCUMENTATION



- Suggestions for Building a Defensible Record
  - Standardized templates
  - Centralized secure storage
  - Version control practices
  - Document retention calendar
  - Annual internal audit
  - Litigation hold procedures

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DON’T FORGET

- State laws may require longer retention.
- Litigation holds override the 7-year rule.

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ROOSEVELT HIGH SCHOOL

OSP CASE FILE

Case Number: OSP-2026-0147

Investigator: Sarah Jones

Date Opened: October 6, 2025

Allegation: Dating Violence / Sexual Harassment

Complainant: Maya R.

Respondent: Jordan T.

Status: Open Investigation

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SECTION 1
INTAKE SUMMARY



Date Report Received: October 6, 2025
Reporting Party: School Counselor
Summary: Counselor reported that Maya disclosed concerns involving former boyfriend Jordan.
Maya reported that Jordan grabbed both of her wrists in a hallway near the gym during lunch on October 3.
Maya stated she told Jordan to let go several times.
Jordan released her after another student approached.
Maya reported feeling scared.
Counselor advised Maya has missed classes and requested assistance.

Additional Information:

- ***Jordan has reportedly been struggling emotionally due to his parents' divorce.***
- ***Jordan has attended counseling sessions for stress.***
- ***Maya's mother reportedly believes Jordan has always been controlling.***
- ***Jordan has a reputation for being possessive in relationships.***

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SECTION 2
JURISDICTION ANALYSIS



- **The allegations appear to involve dating violence occurring between two students.**
- **Potential Title IX jurisdiction exists.**
- **Case assigned for investigation.**

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SECTION 3
SUPPORTIVE MEASURES



Supportive Measures Offered:

✓ Counseling support

✓ Lunch accommodation

✓ Schedule review

No-contact directive discussed.

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SECTION 4
CONTACT LOG



10/6
Phone call to Maya's mother.
Outcome:
Discussed case.

10/7
Email sent.
Outcome:
No response.

10/9
Phone call to Witness A.
Outcome:
Completed interview.

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SECTION 5
EVIDENCE LOG



Item 1
Source: Maya's mother
Description: Screenshots
Date Received: 10/8
Relevance: Messages between students
Storage: Electronic file

Item 2
Source: Witness A
Description: Witness statement
Date Received: 10/9
Storage: Case file

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SECTION 6
COMPLAINANT INTERVIEW SUMMARY



Date: 10/10

Maya reported:
Jordan has been following her around school.
Jordan watches her social media.
Jordan touched her breasts on the bus.
Jordan once put his hand under her skirt during a field trip.
Jordan has always been obsessive and controlling.
Maya appeared truthful and emotionally affected.

Investigator Notes:
Maya cried several times.

I found her highly credible.

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SECTION 7
RESPONDENT INTERVIEW SUMMARY



Date: 10/11
Jordan denied all allegations.
Jordan stated Maya was angry because he ended the relationship.

Jordan reported:
"Everyone knows Maya exaggerates."
Jordan advised he has been struggling because of his parents' divorce.

Jordan stated:
"I never touched her sexually."

Investigator Notes:
Jordan seemed defensive.
Jordan avoided eye contact.

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SECTION 8
WITNESS A



Witness stated:
"I saw Jordan holding Maya's wrists."

Witness further stated:
"Jordan is weird."
"He used to sell drugs."
"He is not a good guy."

Witness stated Maya appeared scared.

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SECTION 9
WITNESS B



Witness stated: Jordan stood very close to Maya.

Witness observed Maya crying afterward.

Witness stated: Last year Jordan called Maya a "crazy bitch."

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SECTION 10
WITNESS C



Witness stated:

Everybody knows Jordan gets jealous.

He follows Maya around.

He tracks her location.

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SECTION 11
FINDINGS



The evidence shows Jordan likely engaged in dating violence.
Maya appeared truthful.
Jordan appeared deceptive.

Witnesses generally supported Maya's version of events.

Finding: Responsible

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SECTION 12
CASE CLOSURE



Date Closed: November 15

Supportive Measures: Provided to Complainant

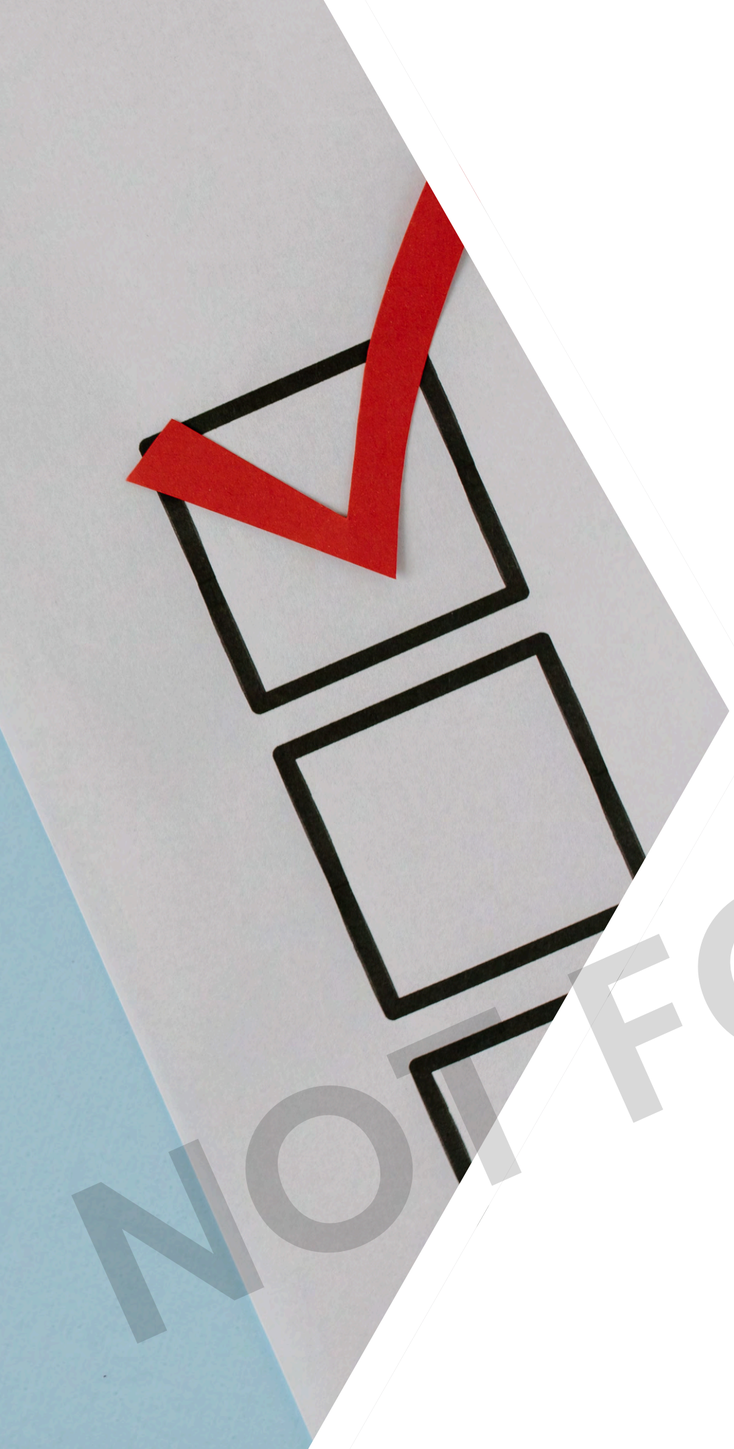
Notifications: Sent to parents

Appeal Rights: Provided

Further Documentation: None

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5-STEP IMPLEMENTATION PLAN

1. Audit current files
2. Identify documentation gaps
3. Standardize templates
4. Train personnel
5. Calendar retention deadlines

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DOCUMENTATION PROTECTS EVERYONE



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QUESTIONS?

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