

Title IX REACT Checklist

Title IX Compliance	Prepare to REACT ✓ Update employee/student sexual harassment policies ✓ Post and/or disseminate required notices and materials ✓ Train Title IX Coordinator, Investigators, Decision-Makers, Informal Resolution Officers
Recognize	Identify Potential Allegations of Sexual Harassment ✓ Sexual Harassment under Title IX 1. Quid pro quo by an employee 2. Unwelcome conduct that is severe, pervasive, and objectively offensive 3. Sexual assault, dating violence, domestic violence, or stalking Notify Title IX Coordinator ✓ Assess mandated reporter duties
Evaluate	Assess the Nature of the Complaint ✓ Does the complaint/allegation trigger a Title IX obligation? 1. Does the alleged conduct constitute sexual harassment under Title IX? 2. Is there jurisdiction over the conduct? ✓ Do you have a formal complaint signed by a victim or the Title IX Coordinator?
Act	Implement Supportive Measures Determine Whether the Complaint/Allegations Trigger a Mandatory/Discretionary Dismissal Initiate an Investigation into the Formal Complaint or Engage in the Informal Resolution Process ✓ Send written Notice of Investigation to Complainant and Respondent ✓ Consider/Offer Informal Resolution, as appropriate Gather, Review, and Preserve Evidence Conduct Witness Interviews Review of Evidence by the Parties ✓ Send the parties any evidence directly related to allegations in the complaint ✓ Parties should be given 10 days to respond to evidence Prepare the Investigation Report ✓ Send the parties the Investigation Report at least 10 days before a determination of responsibility is made and allow them the opportunity to respond ✓ Allow the parties the opportunity to submit written, relevant questions Decision-Maker Makes a Determination of Responsibility for Sexual Harassment Afford the Parties the Right to Appeal the Determination of Responsibility
Corrective Measures	Take Actions in Response to Sexual Harassment That Are Reasonably Calculated to Stop Harassment and Prevent Recurrence of Harassment
Thoughtful Reflection/Recording	Reflect on REACT Recordkeeping Requirements ✓ Post and keep training materials and resources for seven years ✓ Retain records of response to complaints/allegations, as required