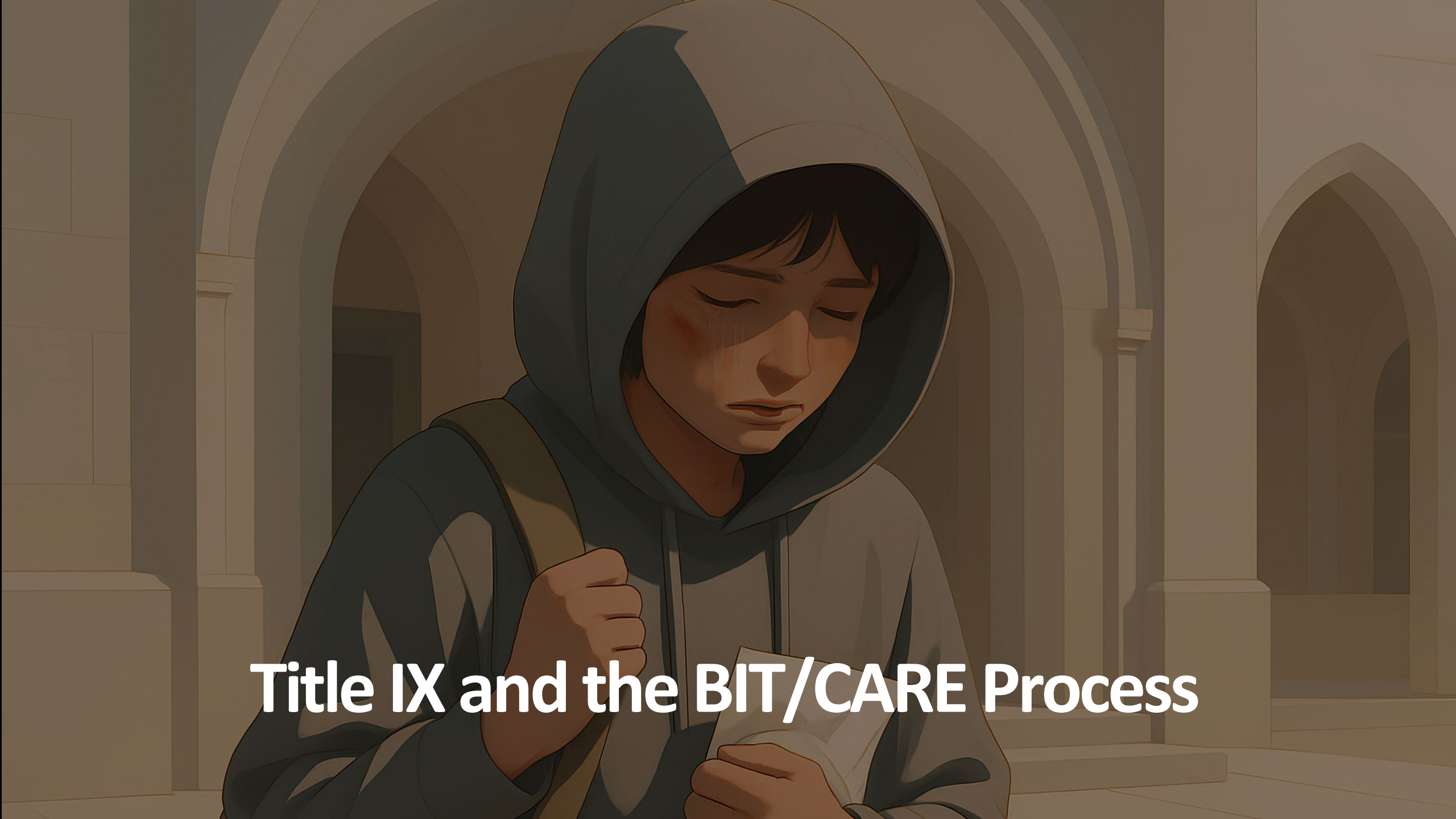
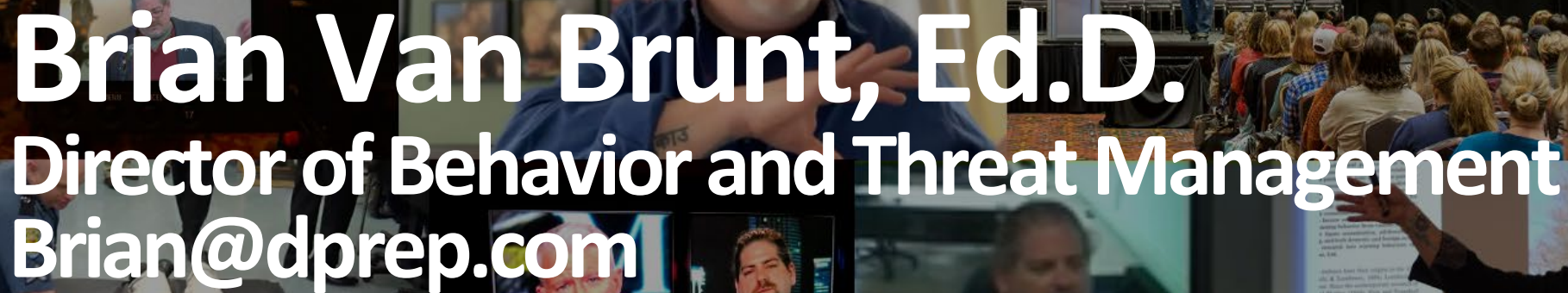


An illustration of a young person with dark hair, wearing a grey hoodie, sitting in a hallway with arched doorways. They have their eyes closed and are crying, with tears visible on their face. They are holding a small, crumpled piece of paper in their hands. The lighting is dim and warm, creating a somber atmosphere.

Title IX and the BIT/CARE Process



Brian Van Brunt, Ed.D.
Director of Behavior and Threat Management
Brian@dprep.com





Chris Taylor, Ph.D.
President, InterACTT
chris@interactt.org
www.christaylorconsulting.net



BIT/CARE FRAMEWORK, THREAT ASSESMENT, AND INTERVIEWING

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Title IX covers sex-based discrimination in an education program or activity, meaning the school must respond when students, staff, or faculty experience discrimination or harassment because of sex.

It includes sexual harassment (including hostile environment and quid pro quo), sexual assault, dating violence, domestic violence, and stalking, as well as discrimination based on pregnancy or related conditions and, under current state laws, often includes discrimination related to gender identity and sexual orientation.



It also prohibits retaliation against anyone for reporting, participating, or supporting someone in a Title IX matter.



Title VI covers discrimination and harassment based on race, color, or national origin in programs and activities that receive federal financial assistance (most colleges).



Schools respond when identity-based conduct becomes severe or pervasive enough to limit a person's ability to participate in or benefit from the College's education environment, including hostile environment and retaliation for reporting or participating in a process.



Title VI can also apply when harassment targets shared ancestry or ethnic characteristics (sometimes overlapping with religious identity when it's being used as a proxy for ancestry or ethnicity) and often includes concerns tied to language access and national-origin-based bias.





The Good



The Bad



The Ugly



The Good

BIT/CARE helps conceptualize larger
services and processes adjacent to
Title IX/VI.

Title IX/VI reports are routed to OIE
for civil-rights assessment.

We work in parallel, not
as investigators.

BIT/CARE can support students
needing interim measures without
waiting for a finding.

When there is imminent risk,
we act first.

Emergency response, safety
measures, and urgent coordination
can happen regardless of whether a
formal complaint is filed.



The Bad

Privacy is important, but FERPA is the general BIT and Title IX/VI standard.

There should not be a “hard wall” between Title IX/VI, BIT, Conduct, and law enforcement.

Title IX should be a core member of the team, even though they will not be involved in every case.

Schools that separate Title IX/VI from their BIT/CARE through team membership pay the price down the line in terms of coordinated services.



The Ugly

BIT/CARE is not a substitute or replacement for the Title IX/VI process.

Do not interview witnesses to establish facts, determine responsibility, or recommend sanctions.

Centralized reporting helps better
triage cases.

Siloed reporting raises the risk of
isolating details that might be useful for
larger support and intervention.



Maya, a first-year student, tells a resident assistant that she was sexually assaulted by Jordan, a sophomore she met at an off-campus party.

Maya says she does not want to file a formal complaint right now, but she is scared because Jordan lives in a nearby residence hall and keeps texting, “We need to talk,” and showing up near her dining hall shift.

Over the next week, Maya misses classes, has panic symptoms, and asks to switch lab sections and move rooms.



**The CARE/BIT team
receives a referral from
Counseling noting
escalating anxiety, sleep
disruption, and fear of
running into Jordan.**

**Residential life staff
receives a call from
Maya's roommates'
mother, concerned
about what happened.**

**The Title IX office
reaches out to offer
supportive measures
and explain reporting
options.**

**Campus Safety shares
Jordan was seen pacing
outside Maya's building
late at night and told a
friend, "If she ruins my
life, I'll make sure she
regrets it."**

**The threat assessment
team begins a parallel,
limited-scope
assessment focused on
safety and potential
escalation.**

A coordinated plan is developed:

- Immediate housing and academic adjustments for Maya,
- no-contact directive,
- safety planning, and
- structured information-sharing between Title IX, CARE/BIT, threat assessment, and Campus Safety.



Amina, a first-year student of Palestinian heritage, reports to the Office for Institutional Equity (OIE) that she has been targeted with repeated anti-Arab slurs and “terrorist” comments in her residence hall and on an anonymous social media account that tags her name and dorm.

The posts include photos taken of her walking to class and a message that says, “We know where you live. You don’t belong here.” Amina says she does not want to file a formal complaint yet, but she wants the posts to stop and she’s scared to be alone on campus.

Over the next two weeks, Amina stops attending a discussion section where a classmate made hostile comments about her ethnicity and has a panic episode during an exam.



Amina also tells a counselor she is sleeping poorly, checking exits constantly, and has started avoiding dining halls.

Campus Safety receives two reports of students harassing Amina at the dining hall, with one having arguments filmed by bystanders.

Her professor reports a sharp drop in participation and missed labs.

She requests academic flexibility and asks Disability Services about temporary accommodations due to anxiety symptoms.

Departmental Involvement

- **OIE/Title VI:** intake, supportive measures, pattern tracking (other reports), options discussion, non-retaliation notice.
- **BIT/CARE:** coordinated care plan, threat/behavioral risk screen, communication hub, so supports are aligned and documented.
- **Campus Safety:** safety planning (escort routes, residence hall checks), evidence preservation guidance, assess “true threat” indicators, liaison with local law enforcement if needed.
- **Academics:** attendance flexibility, exam rescheduling, lab/ section switch, faculty guidance on responding without “investigating.”
- **Accommodations (Disability):** short-term adjustments (reduced-distraction testing, flexibility) and referral pathways if symptoms persist.
- **Counseling:** crisis support, coping plan, stabilization, and ongoing care coordination with consent.

Quick Take-a-Ways

- While Title IV has its own process, don't avoid starting your own just because "they have it." This is particularly important in cases involving threats of violence.
- A no-contact directive is not a set it and forget it prospect. Monitoring this process for fidelity.
- The BIT/CARE team may be able to better identify and address system conflicts that need resolution.
- BIT/CARE and threat can often assist with potential safety assessments.

Bottom Line

Use consistent intake language so reports receive predictable, equitable handling across both offices.

Create two-way referral habits so whichever office hears first promptly loops in the other.

Coordinate fast, time-sensitive response timelines so supportive measures and safety planning move in sync.

Share “need-to-know” case updates so BIT can act effectively without compromising privacy, rights, or confidentiality.

Anticipate role conflicts and create participation thoughtfully, using core teams plus “call-in” Title IX expertise.

Build routine cross-training so Title IX and BIT/CARE understand overlap, roles, handoffs, and shared risk signals.

Treat campus climate as a shared dashboard, using trend reviews to prevent harm and strengthen equity.

BIT supports risk assessment and interventions, but does not investigate or sanction.