**Conflict of Interest for Title IX At-A-Glance**

Grinnell College has an obligation to demonstrate and document good governance in order to protect the integrity and credibility of the College and to maintain the trust and confidence of our constituents. All College employees involved in investigating or resolving a report of Prohibited Conduct will receive appropriate training in support of their role. The College maintains a separate Conflict of Interest Policy. The Policy is also intended to address conflicts that arise when a College employee’s personal interests or relationships conflict with the ability of such employee to act in a neutral manner with regard to a complaint against a faculty member, staff member or student.

- Either party may raise a challenge to the designated investigator on the basis of actual bias or conflict of interest. This challenge must be raised, in writing, to the Title IX Coordinator within two (2) business days of receipt of the Notice of Investigation.
- Either party may raise a challenge to the designated adjudicator on the basis of actual bias or conflict of interest. This challenge must be raised, in writing, to the Title IX Coordinator within two (2) business days of receipt of the Notice of Investigation.
- Either party may raise a challenge to the Appeals Officer on the basis of actual bias or conflict of interest. This challenge must be raised, in writing, to the Title IX Coordinator within two (2) business days of receipt of notice of acceptance of the appeal.

The Title IX Coordinator does not investigate, adjudicate, or serve as an appeal officer in cases of sexual misconduct. For more information, see the [Role of the Title IX Coordinator At-A-Glance](#).

*Title IX does not categorically preclude particular employees from serving as Title IX coordinators. However, Title IX coordinators should not have other job responsibilities that may create a conflict of interest. Because some complaints may raise issues as to whether or how well the school has met its Title IX obligations, designating the same employee to serve both as the Title IX coordinator and the general counsel (which could include representing the school in legal claims alleging Title IX violations) poses a serious risk of a conflict of interest. Other employees whose job responsibilities may conflict with a Title IX coordinator’s responsibilities include Directors of Athletics, Deans of Students, and any employee who serves on the judicial/hearing board or to whom an appeal might be made. Designating a full-time Title IX coordinator will minimize the risk of a conflict of interest. – US Department of Education, Office for Civil Rights. 2014* [Questions and Answers on Title IX and Sexual Violence](#)

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