



The Digital Identity Foundation

IMAGE-BASED SEXUAL ABUSE · A TITLE IX FIELD GUIDE

TITLE IX · CONDUCT · RESLIFE · GREEK LIFE

TRAINING USE

CAMPUS FIELD GUIDE · 2026

It Starts in a Dorm Room

In June 2025, deputies searched a dorm room at Northern Illinois University and found more than 20,000 AI-generated images. That is 20,000 images of real students' lives.

When this happened, there was no federal law. There is now.
You can help your students get protection and justice.

What Still Applies — and What Doesn't

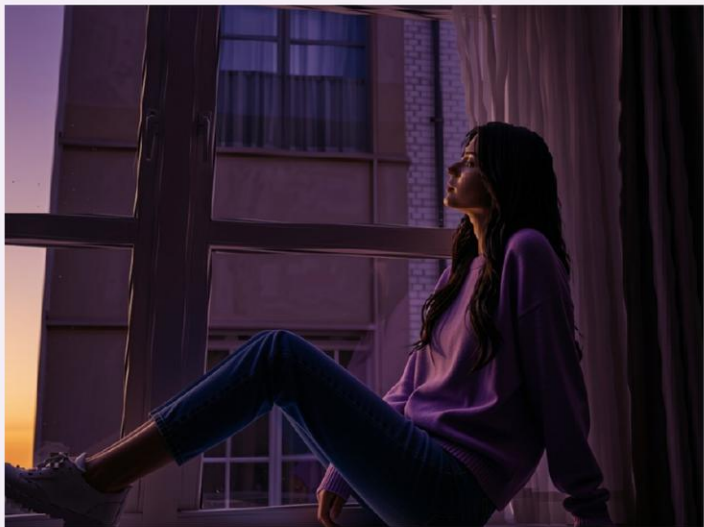
STATUS LEDGER · AS OF 2026

DOCUMENT	INSTRUMENT	STATUS	DATE
2020 Rule	General hostile-environment standard	● IN EFFECT	Pre-2024
2024 Rule	Explicit deepfake hostile-environment language	● VACATED	Jan 9, 2025
OCR AI	"Avoiding Discriminatory Use of AI" guidance	● RESCINDED	Nov 2024
TAKE IT DOWN	Federal criminal penalties + 48-hr platform removal	● PLATFORM-ONLY	May 2025

The 2024 Title IX Final Rule was the first federal regulation to say explicitly that sexually explicit deepfakes can create a hostile environment. A federal judge in the E.D. of Kentucky vacated it nationwide on January 9, 2025.

The November 2024 OCR guidance that found a police referral alone inadequate has been rescinded. It remains online only as a historical document – not as current federal direction a campus can cite.

The TAKE IT DOWN Act is real and enforceable, but it regulates platforms, not schools. There is no compliance deadline for a Title IX office – only a right your students have that your office should know exists.



WHY IT REACHES YOUR OFFICE FIRST

A student rarely arrives with a legal question. She comes to your office desperately seeking help. She needs to get her abuse images down. She needs to know she's safe on your campus.

Image-based sexual abuse lands on campus as a housing problem, a conduct report, a counseling appointment, a 2 a.m. text to an RA. The removal work and the Title IX analysis are two different clocks – and only one of them can wait.

Real Cases Involving U.S. Campuses

5 DOCUMENTED CASES

20,000+

IMAGES DOCUMENTED ACROSS THESE CASES

3,500+

PEOPLE VICTIMIZED ACROSS THESE CASES

CASE ONE · NIU

20,000 IMAGES

Northern Illinois University

A 19-year-old student sold access to a Telegram channel of AI-generated images made from former classmates. 21 felony counts; the tip came from NCMEC, not campus.

• DAILY HERALD · JUNE 2025

CASE TWO · ASU

CHAPTER SUSPENDED

Arizona State University

A fraternity member secretly filmed an intimate encounter and shared it with brothers as a pledging ritual. The chapter was suspended in October 2025.

• THE STATE PRESS · SEPT 2025

CASE THREE · UCF

200+ STUDENTS

University of Central Florida

A fraternity's private archive of intimate photos and videos, shared without consent, reached more than 200 students before a federal lawsuit surfaced it.

• CBS NEWS · 2018

CASE FOUR · KUTZTOWN

SEXTORTION

Kutztown University

A sophomore died by suicide after a sextortion scheme run from Nigeria. Two men were extradited and federally prosecuted. Sextortion moves in hours, not weeks.

• DOJ · USAO E.D. PA. · 2025-26

CASE FIVE · UMICH

3,300+ PEOPLE

University of Michigan

A former assistant football coach faces federal hacking and identity theft charges over private media stolen from 3,300+ people – abuse isn't only student-on-student.

• ONGOING FEDERAL CASE · 2025-26

What To Do Now — By Role

01 Title IX Coordinator

Write down, in plain language, how your office analyzes whether a deepfake or NCII incident meets the hostile-environment standard. Loop in counsel to track the 2024 rule's appeal.

03 Residence Life / RAs

You're frequently the first person a student tells. You don't need to resolve the legal question – know who to route the student to immediately, and that a specialist like DIF can move on image removal same-day.

05 Campus Counsel

This guide is not legal advice and isn't a substitute for your own read of where the 2024 rule litigation stands. Treat it as a plain-language starting point for your institution's policy language.

02 Student Conduct

Know the line between a Title IX matter and a criminal one. A case involving a minor – including an old high school photo – is a CSAM report to law enforcement and NCMEC, and it doesn't wait for your process.

04 Greek Life Advisors

The ASU and UCF cases involved organizations your students already trust. Build image-based abuse explicitly into hazing and conduct education, not as a footnote to broader training.

YOU DON'T HAVE TO BUILD THIS ALONE

You have a role to play, and what matters is this: no student should suffer alone. This is sexual violence — playing out online in the lives of students you walk past every day.

DIF offers free training built around what your office is seeing, plus a free, confidential resource for students that can move on image removal immediately – independent of your internal process.

thedigitalidentityfoundation.org/campuses

OR CONTACT US TO TALK THROUGH WHAT YOUR CAMPUS
IS SEEING



THE DIGITAL IDENTITY FOUNDATION

This guide is educational and is not legal advice. Confirm current federal and state requirements with your institution's counsel.