

TENNESSEE INDEPENDENT
COLLEGES AND UNIVERSITIES

UNDERSTANDING AND
IMPLEMENTING
TITLE IX REGULATIONS



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TICUA

IN PARTNERSHIP WITH THE PEABODY
COLLEGE AT VANDERBILT UNIVERSITY

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FOREWORD

We, Janessa Dunn and Jessica Forinash, completed this study in partial fulfillment of the requirements for the doctor of education degree from the Peabody College of Education and Human Development at Vanderbilt University in Nashville, TN.

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EXECUTIVE SUMMARY

The Tennessee Independent Colleges and Universities Association (TICUA) is a 34-member organization designed to collaborate and compile resources to advocate for its member institutions. All members are private, not-for-profit institutions that offer a variety of postsecondary degree offerings (e.g., bachelor's, master's, doctoral, certificate). In 2021, TICUA members institutions enrolled 27 percent, or 78,024 students, attending a postsecondary institution in the state of Tennessee. Of those who studied at TICUA members institutions, approximately 55,000 students were full-time or part-time undergraduate students.

In partnership with TICUA, Janessa Dunn and Jessica Forinash have prepared the following, for consideration by Dr. Claude Pressnell, President of the Tennessee Independent Colleges and Universities Association:

- A historical perspective of Title IX in the 20th and 21st Centuries.
- An exploratory study to understand the implications of recent Title IX amendments on TICUA Member Institutions.

KEY RESEARCH QUESTIONS

1. What do TICUA institutions know about Title IX's history?
2. Do TICUA institutions understand recent changes to Title IX's provisions?
3. Do TICUA institutions feel they are equipped to implement Title IX's most recent provisions?

KEY FINDINGS

- At least 75% of respondents feel that faculty, staff, and students have at least a "moderate understanding" of Title IX's founding purpose.
- Contrarily, 50% of respondents feel that faculty and staff have "little understanding" of the 2020 amendments to Title IX. Slightly more than 50% feel that students have "little understanding" of the 2020 amendments.
- The majority of TICUA member institutions feel they are equipped to implement provisions to Title IX. Of those that said they don't feel equipped, funding, training, and additional human resources were the most salient needs.

FIVE RECOMMENDATIONS FOR INSTITUTIONAL PRACTICE

- *PROVIDE FREE OR DISCOUNTED TITLE IX TRAINING OPPORTUNITIES FOR TITLE IX COORDINATORS.*
- *INCREASE ACCESS TO AN ON-CALL ATTORNEY via TICUA PARTNERSHIP.*
- *CONSIDER SOCIAL MEDIA AS A TITLE IX TRAINING TOOL FOR FACULTY, STAFF, AND STUDENTS.*
- *INCREASE ADMINISTRATIVE SUPPORT TO TITLE IX COORDINATORS.*
- *PROVIDE ADDITIONAL TRAINING SUPPORT TO MINORITY-SERVING INSTITUTIONS.*

INTRODUCTION

Established by the Education Amendments of 1972, Title IX is an important statute of legislation that was enacted to protect individuals when discrimination and harassment on the basis of sex was prevalent in American society. Title IX states that “no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance” (Department of Education, 2021; *Education Amendments Act of 1972, 20 U.S.C. §1681 et seq*). Its broad implications imply that all individuals involved in a U.S. college or university should be aware of its purpose, their personal rights established by the statute, and the role they play in making sure the institution is compliant. Although simple in its phrasing, upholding policies in alignment with Title IX is a hefty task. Title IX has affected higher education institutions in many ways since its inception, and it is imperative to highlight key historical movements to understand its impact.

Followed by a historical background of Title IX amendments, an exploratory study will be described to understand the implications of Title IX amendments for Tennessee Independent Colleges and Universities Association (TICUA) members—particularly for Title IX coordinators. Descriptive findings will be analyzed through the lens of four dimensions: the institution’s size, religious affiliation, minority-serving status, and setting. We define *size* within three realms: less than 2,000 undergraduate students, 2000<4,000 undergraduate students, and >4,000 undergraduate students (Dunn & Forinash, 2021). We also delineate an institution’s *minority-serving status* in alignment with the Office of Diversity, Inclusion and Civil Rights’ definition for minority-serving institutions (e.g., Historically Black Colleges and Universities, Hispanic Serving Institutions, Tribal Colleges and Universities, and Asian American and Pacific Islander Serving Institutions) (U.S. Department of the Interior, 2022). Furthermore, we define *setting* using the College Board’s Big Future definitions of rural, suburban, and urban settings (College Board, 2022). Finally, we define *religiously affiliated* institutions as institutions who are affiliated with a known denomination as observed in the College Board’s BigFuture college search tool (College Board, 2022).

We will conclude our descriptive findings with key takeaways and recommendations that can be adopted by TICUA member institutions as well as the TICUA staff to support Title IX coordinators in their important work.

A HISTORICAL PERSPECTIVE EDUCATIONAL AMENDMENTS OF 1972

On June 23, 1972, Title IX was enacted as a component of a general education bill, the Education Amendments of 1972, to “prohibit discrimination on the basis of sex in all education programs and activities that received federal funds” (Buchanan, 2012; *Education Amendments Act of 1972, 20 U.S.C. §1681 et seq.*). Title IX ensured the protection of women in educational settings. Even though the statute is quite clear and concise in prose, its implications are often convoluted. For example, Title IX does not specifically require female athletes to receive the same facilities or equipment as male athletes; but it does ensure that the facilities and equipment are not *substantially different* (Buchanan, 2012). The term “substantially different” has the potential for multiple interpretations at higher education institutions. Furthermore, Title IX’s scope stretches beyond college athletics. It covers areas that span from equitable access to educational programs to how institutions respond to acts of sexual assault on their campuses (Galemore, 2004; U.S. Department of Education, 2011). We have made an arduous attempt to capture Title IX’s scope while paying close attention to the swift changes in amendments during presidential changes in power.

EDUCATIONAL EQUITY FOR WOMEN IN ACADEMIA

During the 1960’s and 1970’s, the women’s civil rights movement highlighted issues concerning how women were treated in educational settings in the United States (Galemore, 2004, pg. 3). This period of enlightenment prompted the United States Congress to hold hearings to further understand discriminatory barriers that women faced in higher education. Testimonies from these hearings highlighted barriers to public and private universities including the exclusion of admitting women to undergraduate programs, holding higher standards for women for admission consideration, and upholding quotas to control the number of women and men admitted to academic programs (Galemore, 2004, pg. 3). Women also experienced discriminatory behavior if they were married. Some academic

programs, such as nursing, chose not to offer admissions to married women and often denied financial aid opportunities to women as well (Galemore, 2004, pg. 3). Furthermore, women were also excluded from joining honor societies (Galemore, 2004, pg. 4).

The Department of Education and Office for Civil Rights highlight three pieces of legislation that directly address the educational equity for women: the Women's Educational Equity Act of 1974, Title IV of the Civil Rights Act of 1964, and the 1976 amendments to the Vocational Education Act of 1963 (U.S. Department of Education, 1997). The Women's Educational Equity Act of 1974 "[provided] for federal financial and technical support to local efforts to remove barriers for females" through areas such as research and training (U.S. Department of Education, 1997, p. 4). Although an increase in women achieving degrees in math and science occurred in the late 20th Century (U.S. Department of Education, 1997), simply increasing the number of degrees achieved by women was only one step toward equity.

Researcher Iram Valentine believes that "if a young female has been conditioned to believe that mathematics is inappropriate for her, simply placing her in a math classroom with boys will not solve the problem...it may actually accelerate the process of alienation. Sameness of opportunity has not resulted in equity for women" (Valentine, 1997, p. 5). It is important to note here that the experience of women in predominantly male spaces was just as important as achieving the outcome (college degree) at the turn of the 21st Century. Furthermore, the Office for Civil Rights did not completely overlook the need for equity in education settings.

Title IV of the Civil Rights Act of 1964 added a layer of accountability and resource support to educational institutions on the regional and state level to support compliance with the nondiscrimination mandate in school (U.S. Department of Education, 1997). Before the turn of the 20th Century, an examination of women in American society was observed by the Department of Education and Office of Civil Rights. In 1971, only "18 percent of young women and 26 percent of young men had completed four or more years of college" (U.S. Department of Education, 1997, p. 3). By 1994, "27 percent of both men and women had earned a bachelor's degree" (U.S. Department of Education, 1997, p. 3). By 1997,

women made up the majority master's degree holders in U.S. colleges and universities (U.S. Department of Education, 1997). Progress for women, in terms of degree completion, began to take shape.

Furthermore, the 1976 amendments to the Vocational Education Act of 1963 doubled-down on the term "discrimination," by eliminating mistreatment "sex bias, stereotyping, and discrimination in vocational education" (U.S. Department of Education, 1997, p. 4). Although funding decreased the barriers to educational opportunities, it only supported partial access. In the late 20th Century, research suggested "that female students in coeducational classrooms received less opportunity to participate and less feedback from teachers than their male counterparts" (Grossman, 1998; Riordan, 1990; Sadker & Sadker, 1995, as cited in Madigan, 2009, p. 11). These suggestions imply that women needed to advocate for themselves more than men in educational settings.

EDUCATIONAL EQUITY FOR WOMEN IN ATHLETICS

Discriminatory behavior on the basis of sex also extended to collegiate athletics. These exclusionary behaviors included women being barred from coaching sports teams and actively underfunding women's sports programs (Galemore, 2004, pg. 4). In 1974, the first national study to describe the inequities that women faced in college athletics was conducted by Margaret Dunkle, sponsored by the Project on the Status and Education and Women (Sandler, 2007; Dunkle, 1974). Examples of discriminatory practices impacted the financial and physical wellbeing of women athletes and coaches. Dunkle found that several coaches for women's teams were unpaid volunteers while coaches for men's sports were typically salaried (Dunkle, 1974; Sandler, 2007). Furthermore, female athletes typically paid for their own treatment for medical injuries induced by athletic play although male athletes were provided with insurance and/or support from health services at their college or university (Dunkle, 1974; Sandler, 2007).

To mitigate these differences, the NCAA and Football Coaches Association drafted three options for the Office for Civil Rights at the Department of Health, Education and Welfare to consider (Sandler, 2007). These three options were in the form of a test to promote equity on the basis of sex in collegiate

sports [extracted from Title IX and Intercollegiate Athletics, 44 Fed. Reg. 71, 413 (Dec. 11, 1979); as cited in Sandler, 2007]:

- *“The abilities and interests of the discriminated group are accommodated OR*
- *The institutions has a continuing pattern of increasing the athletic opportunities of the discriminated against group OR*
- *The number of opportunities for participation for each gender in sports is roughly proportional to that of the percentage of each group in the school’s population.”*

It can be anecdotally inferred that many colleges and universities adopted the third option. Sandler argues that because the number of women participating in postsecondary education and collegiate athletics were small, this option posed minimal to no threat for institutions to dramatically change their approach (Sandler, 2007). Although this assumption by the NCAA and Football Coaches Association may have been plausible during the early 1970s, trends in the 1980s and 1990s were dramatically different. Between 1971 and 1997, women participating in intercollegiate sports quadrupled to 100,000 participants (U.S. Department of Education, 1997). Furthermore, 37 percent of all college student athletes in 1995 were women as compared to 15 percent in 1972 (U.S. Department of Education, 1997). This combination of many legislative actions supported more women in intercollegiate athletics in an unprecedented way.

CIVIL RIGHTS RESTORATION ACT

On January 28, 1988, the Civil Rights Restoration Act of 1987 was enacted to make a necessary and progressive amendment to Title IX. The Civil Rights Restoration Act of 1987 provided clarity to discriminatory behavior, prohibiting discrimination on the basis of sex throughout the entire college or university if any component of the institution receives federal funding (Lieberwitz, et al., pg. 73). Despite a presidential veto attempt, the Civil Rights Restoration Act was passed by Congress, verifying that every higher education institution that accepted federal funds had to comply with Title IX

requirements. Subsequent lawsuits in the 1980's and 1990's helped to define Title IX and the expectations that the government had for college campus enforcement. On February 26, 1992, the court's decision in *Franklin v. Gwinnett County* (1992, 503 U.S.C. §60) declared that monetary awards were allowed against institutions that were intentionally discriminating (Galemore, pg. 3).

1997 GUIDANCE FROM U.S. DEPARTMENT OF EDUCATION

In 1997, the Office for Civil Rights released "Sexual Harassment Guidance: Harassment of Students by School Employees, Other Students, or Third Parties," designed to explain sexual harassment in more detail for education institutions (Anderson & Osborne, 2008; U.S. Department of Education, 1997). It also required educational institutions to adopt grievance procedures if a student sends a complaint about alleged sex discrimination, which also includes sexual harassment (Anderson & Osborne, 2008; U.S. Department of Education, 1997). The 1997 guidance also outlined definitions for *quid pro quo* and *hostile environment sexual harassment*, which made education institutions always liable for *quid pro quo* harassment and as well as the responsible party if an employee with authority aids in harassment (Anderson & Osborne, 2008; U.S. Department of Education, 1997). Furthermore, it provided clarity for ramifications for sexual harassment between peers (Anderson & Osborne, 2008; U.S. Department of Education, 1997). Soon after this guidance was released, it was swiftly put to the test in the k-12 sector.

The Supreme Court's decision in *Gebser v. Lago Vista Independent School District* (524 U.S.C. §274, 1998) confirmed that a student could seek monetary damages for an employee's sexual harassment if a school official has authority to act and deliberately chose not to do so (Anderson & Osborne, 2008). One year later, peer-to-peer sexual harassment was observed. In *Davis v. Monroe County Board of Education* (526 U.S.C. §629, 1999), the Supreme Court "held that the student has an implied right of action under Title IX when the sexual harassment is so severe, pervasive, and objectively offensive that it effectively bars the victim's access to an educational opportunity or benefit" (Anderson & Osborne, 2008, p. 150; 526 U.S.C. §653, 1999). It is interesting to note here that these protections extend from the k-12 sector into higher education as well.

TITLE IX IMPLICATIONS IN THE 21ST CENTURY

In the 21st Century, defining Title IX policies via lawsuits have diminished in scope. Instead, the Department of Education frequently assess and update regulatory practices as the primary mechanism for how Title IX should be defined and enforced.

PRESIDENT GEORGE W. BUSH: “DEAR COLLEAGUE” LETTER

In 2005, during the President George W. Bush’s second presidential term, the Department of Education gave additional clarification for the three-prong test to determine if discrimination existed between men and women in educational settings (Buchanan, 2012). This “Dear Colleague” letter specifically presented clarification for the third prong: “the school is fully and effectively accommodating the interests and abilities of the underrepresented sex” (U.S. Department of Education, 2005, p. iii). The clarification was in the form of a model survey that could be used “to measure student interest in participating in intercollegiate varsity athletics” (U.S. Department of Education, 2005, p. iii). Unfortunately, this clarification lacked the accountability needed to uphold equity for women. To remain compliant after a survey was administered to students, if the institution felt that the responses were not significant, they were not required to act upon those responses (Buchanan, 2016; U.S. Department of Education, 2005).

While it is unclear if the term “significant” means statistically significant (e.g., $p\text{-value} < 0.05$) or significant for the institutions (e.g., mission, values), its interpretation by educational institutions promoted a deficit in accountability towards potential discriminatory behavior. The 2005 “Dear Colleague” letter was rescinded by President Obama’s administration in 2010 and replaced by another “Dear Colleague” letter (Buchanan, 2012; James, 2010; U.S. Department of Education, 2010) to mitigate this ambiguity.

PRESIDENT BARACK OBAMA: “DEAR COLLEAGUE” LETTER

On April 20, 2010, the Office for Civil Rights and U.S. Department of Education provided more clarity to the three-prong test used to uphold the Intercollegiate Athletics Policy in U.S. educational institutions (U.S. Department of Education, 2010). The new guidance required the Office for Civil Rights “to consider whether an institution is effectively accommodating the athletic interest and abilities of students of both sexes” (U.S. Department of Education, 2010, p. 1). This distinction was a critical change to how institutions interpreted survey data from students. The Office for Civil Rights became the responsible body for ensuring institutional compliance with the three-prong test, not the institutions themselves.

Furthermore, on April 4, 2011, a “Dear Colleague” letter from the Office of Civil Rights highly encouraged institutions to end harassment, prevent harassment, and eliminate a hostile environment on their campuses (Brookings, 2020; U.S. Department of Education, 2011). This letter, which is also deemed “The Dear Colleague Letter” in the higher education sector, “[explained] that the requirements of Title IX pertaining to sexual harassment also cover sexual violence, and lays out the specific Title IX requirements applicable to sexual violence” (U.S. Department of Education, 2011, p. 1). The letter also defined *sexual violence* as “physical sexual acts perpetrated against a person’s will or where a person is incapable of giving consent due to the victim’s use of drugs or alcohol” (Department of Education, 2011, p. 1).

As one may imagine, specific definitions from the Department of Education as it relates to sexual violence was a new concept that was not previously articulated with such depth, startling many in the higher education field. In fact, the Department of Education designed this letter to supplement the 2001 guidance on sexual violence presented by the Bush administration (U.S. Department of Education, 2001; U.S. Department of Education, 2011), which primarily focused on *sexual harassment*. Delineating sexual violence and sexual harassment increased the ways in which institutions needed to respond to such acts.

Higher education institutions were particularly confused by some of the language in “The Dear Colleague Letter,” however. First, they sought clarification on its purpose. Many colleges felt that

the Office for Civil Rights were not clear about the recommendations that should be cemented in practice and those that should be simply considered (New, 2016). Furthermore, they were not sure if there were legal ramifications for not adhering to a recommendation that *must* be enforced rather than *should* be enforced (New, 2016). These inquiries from institutions had merit, but they were challenged by advocates of victims of sexual assault who felt that colleges' focus on adhering to new policies were driven by a desire to divert institutional responsibility for campus sexual assault rather than fear of making a mistake (New, 2016).

Furthermore, human resources to support the necessary procedures outlined in the "Letter" were sparse. In 2015, a survey conducted by ATIXA, the Association of Title IX Administrators, confirmed that only 10 percent of those surveyed had no other major job responsibilities (Brown, 2015). It can be implied that Title IX coordinators were taking on "other duties as assigned" for a crucial role at their institutions. During the next presidential administration, both the "Dear Colleague Letter" and the Office of Civil Rights' "Questions and Answers on Title IX and Sexual Violence" guidance were withdrawn (Brookings, 2020).

PRESIDENT DONALD J. TRUMP: RESCINDING "THE DEAR COLLEAGUE LETTER"

To replace guidelines outlined in the "Dear Colleague" letter, a new set of regulations were established on May 6, 2020. These regulations were encompassed in a two-thousand-page document that indicated the procedures institutions needed to follow by law (Brown, 2020). Some guidelines spawned controversy at colleges and universities, and the most controversial elements were the inclusion of live hearings and cross-examination of witnesses (Brookings, 2020). Many of these provisions were challenged in court, and the cross-examination requirement was struck down on July 28, 2021 (Redden, 2021).

THE TITLE IX COORDINATOR ROLE

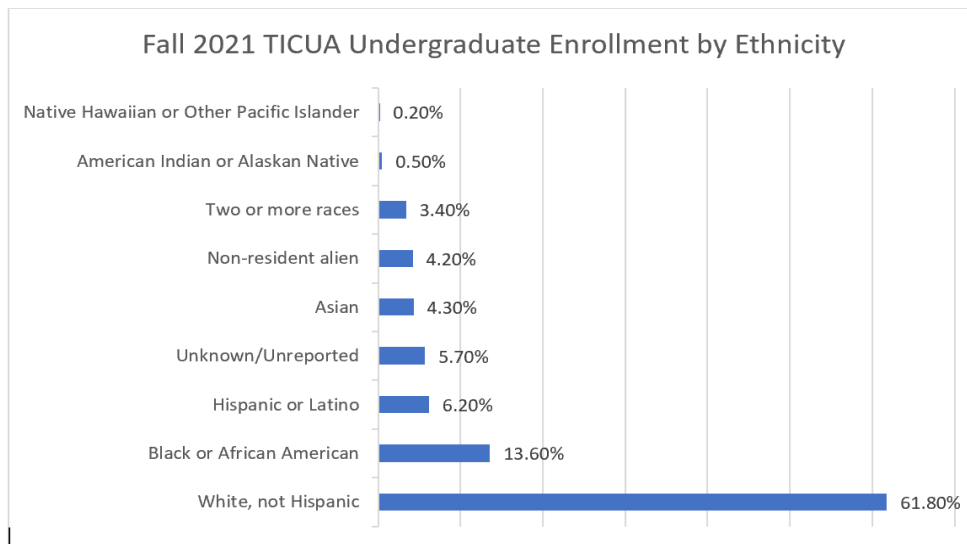
On college and university campuses, Title IX compliance is an important issue that requires educating faculty, staff, administrators, and students. Although Title IX has existed for several decades, recent changes to administration on the federal level have prompted colleges and universities to respond to juxtaposing philosophies of its policies with little resources to adapt to these policies expediently. In fact, the Department of Education has announced new rules will be released in May 2022 to replace the 2020 regulations (Redden, 2021). It is important to study these shifts in rules and regulations to understand the impact they may have on Title IX coordinators and their daily work on college campuses.

As a response to the 2011 “Dear College” Letter, Title IX coordinators at small and large colleges in the U.S. have increasingly recognized a need to transition the Title IX coordinator role from a part-time role to a full-time role (June, 2014). Unfortunately, not all institutions are able to make this change immediately or at all. Many institutions have arduously searched for professionals who have the ability to interpret federal regulations and are aware or have experience with receiving and responding to sexual violence complaints (June, 2014). Title IX coordinators who have a law background may feel the need to refine their role as they work with students, faculty, and staff on a daily basis (June, 2014). Contrarily, those with extensive experience in higher education administration may feel inadequate to interpret new regulations on their own (June, 2014).

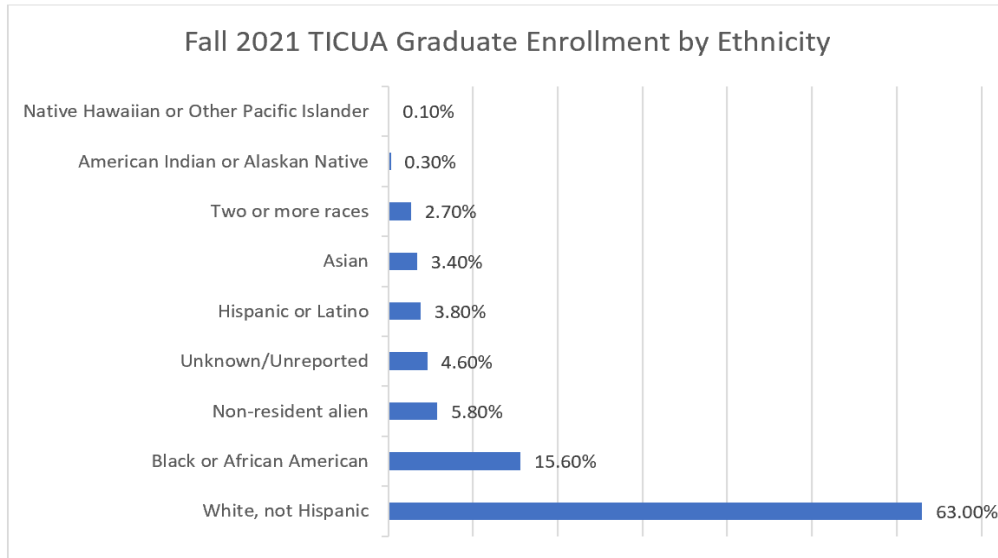
In pursuit of studying these shifts in Title IX policies, private colleges and universities in Tennessee who are members of the Tennessee Independent Colleges and Universities Association (TICUA) have collaborated to compile resources and advocacy for their institutions. TICUA’s mission is to engage Tennessee’s private colleges and universities to work collaboratively in areas of public policy, cost containment, and professional development to better serve the state and its citizens (“About TICUA,” n.d.). TICUA has a vested interest in making sure that its member organizations are aware of Title IX and its place on their campuses.

OVERVIEW OF TICUA

TICUA is composed of 34 accredited, private, non-profit member institutions in the state of Tennessee (see Appendix A for the full membership list). Member institutions offer a variety of degree programs ranging from associates degrees to doctoral degrees. Collectively, TICUA institutions enrolled 27 percent (over 78,000 students) enrolled in higher education in Tennessee in Fall 2021 (TICUA, 2021, pg. 7). Forty-nine percent of students attending TICUA member institutions were Tennessee residents, representing every county in Tennessee (TICUA, 2021, pg. 7). Fifty-one percent were domestic, out-of-state residents or international residents (TICUA, 2021, pg. 7). Undergraduate enrollment at TICUA institutions reached 54,639 for both full-time and part-time students, while graduate enrollment was 23,385, also including full-time and part-time students (TICUA, 2021, pg. 10).

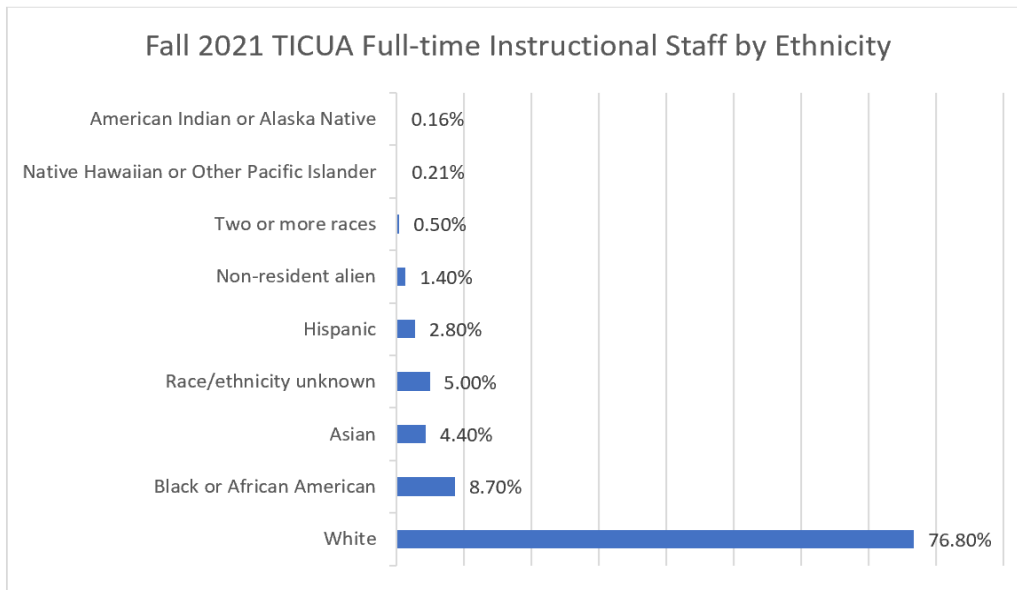


Source: TICUA Fall 2021 Characteristics



Source: TICUA Fall 2021 Characteristics

Of the approximately 21,400 personnel employed by TICUA member institutions in Fall 2019, approximately 8,200 of those employees were instructional staff (TICUA, 2021, pg. 24). Over half (52 percent) of the instructional staff identified as male and the remaining percentage (48 percent) identified as female (TICUA, 2021, pg. 25). Fifty-nine percent of the instructional staff were full time, while forty-one percent were part time (TICUA, 2021, pg. 26).



Source: TICUA Fall 2021 Characteristics

Definition of the Issue and Project Questions

TICUA is seeking a historical understanding of Title IX legislation, with a focus on key developments since 2000. They also seek to understand the impact of White House administration changes and their impact on college and university regulatory implementation of Title IX. TICUA is interested in understanding how these changes affect member colleges and universities, with a primary focus on:

- Understanding Title IX.
- Implementing the scope of Title IX regulation practices among students, faculty, administration, and staff for sexual misconduct and discrimination.
- Evaluating direct and indirect implementation costs.

- Assessing member institutions' ability to clearly communicate and implement Title IX rules and regulations.
- Understanding the varying burdens of implementing Title IX based on the campus' individual characteristics
- Documenting common themes among member institutions.

We seek to appraise the extent to which TICUA member institutions understand Title IX regulatory practices and how they perceive their ability to implement them on their campuses equitably among key stakeholders--students, faculty, administration, and staff. As a result of this evaluation, member institutions will have guidance to which they can refer as they educate administrators (i.e., Title IX coordinators and Human Resource personnel), faculty (i.e., full-time and adjunct lecturers), staff (i.e., residence life coordinators and academic advisors), and students (i.e., resident assistants and student-athletes), to maintain compliance with Title IX provisions. Title IX regulatory practices are complex and ever-changing, and all member institutions are encouraged to equip their communities with the necessary knowledge to adhere to these practices. We anticipate that this new or enhanced knowledge base will benefit students as they pursue their education in a Title IX compliant environment.

Due to perpetual changes of Title IX regulatory practices by the U.S. Department of Education (Anderson, 2020), we anticipate that TICUA member institutions will have varied levels of understanding for how to implement regulatory Title IX practices at their institutions. In addition, we also anticipate varied access to resources as they implement changes and educate campus stakeholders.

METHODOLOGY

We chose to pursue a mixed methods approach to execute the appraisal of TICUA Title IX Coordinators. We used qualitative data analysis to understand perceived understanding of Title IX, approaches to training, and the access to necessary resources at TICUA institutions. We began with a qualitative interview approach to seek understanding of the aforementioned issues. The interview protocol (see Appendix B) was developed to guide the interviews. Claude Pressnell, President of TICUA, provided the email addresses of five Title IX Coordinators who represented a diversity of TICUA institutions, and we reached out to them to encourage their participation. The qualitative interviews were thirty-minute virtual Zoom interviews, arranged at the convenience of the Title IX Coordinators. After sending email reminders, we completed two interviews with Title IX Coordinators at TICUA member institutions.

QUALITATIVE DATA COLLECTION

As we analyze the information gleaned from these informational interviews, themes emerge that better help us to understand Title IX Coordinators, their roles at TICUA institutions, and the expectations placed upon them with ever-changing Title IX regulations. The first theme to emerge is the issue of funding and the amount of money that it takes to stay on top of Title IX regulations. Several professional organizations provide Title IX training, but they can vary in cost, limiting access to institutions that can afford to pay for the expensive training. Additionally, changes in regulations can lead to additional funding required to implement these changes on TICUA campuses to assure compliance. In addition to standard training, new regulations require additional training to be sure that all stakeholders understand implemented changes. The informational interviews indicate that there are some issues in disseminating information to campus stakeholders related to the COVID-19 pandemic, so we also want to be sure we explore how the pandemic may or may not influence their approach to training.

Another theme to emerge is the need for additional access to resources beyond monetary sources. Because Title IX regulations are expansive and sometimes difficult to navigate, those who understand its policies and how they were written become excellent resources for Title IX Coordinators. Some TICUA institutions have easier access to an attorney, as they have one on staff or their Title IX Coordinator is an attorney. Other TICUA institutions must pay for access to an outside attorney, which limits their access as they are only utilized in extreme or necessary situations. One of the interviewees mentions that other Title IX Coordinators are a valuable resource as they navigate a difficult case or seek advice on how to appropriately handle a situation. Another interviewee requires additional staff to implement changes. Finally, due to the changes invoked by the 2020 Title IX amendments, live hearings and cross examinations expose the need for additional volunteers or staff members to fill necessary roles at U.S. institutions.

These findings from the informational interviews prompted us to adapt our quantitative survey to better align with the expressed needs of Title IX coordinators. This reassessment was very helpful, as the initial questions developed for the quantitative survey would not have covered the issues brought up in the informational interviews, such as the need for an attorney during special cases and the accessibility and types of training for Title IX coordinators, staff, and faculty. We are pleased with these changes and feel that we created an improved survey to disseminate to the broader audience of Title IX Coordinators at TICUA member institutions. We believe that beginning with a qualitative questionnaire (informational interviews) allows us to capture hidden variables that affect an institution's ability to implement Title IX provisions.

QUANTITATIVE DATA COLLECTION

The qualitative interviews allowed us to understand the different facets of the Title IX coordinator position and any concerns they have about instituting Title IX provisions on their respective campuses. These findings allowed us to inform and update our quantitative survey (Appendix C). The survey was then sent to 28 TICUA Title IX coordinators by email, from the President of TICUA, Claude Pressnell.

We reduced our sample size from the total 34 TICUA members institutions to 28 member institutions by removing six institutions based on a variety of factors. We chose TICUA member institutions that have the primary focus of educating undergraduate students in a residential setting. For this reason, we excluded TICUA member institutions that offer graduate-only and certificate-only academic programs and institutions that are non-residential. We also excluded Vanderbilt University, the only Research I University serving undergraduate students in TICUA as Dr. Pressnell indicated that Vanderbilt is regularly an outlier in TICUA research. After Dr. Pressnell sent the initial email to the 28 member institutions who met the sample criteria, two additional email reminders were sent to encourage survey completion.

There are three overarching questions that we seek to answer in our quantitative data analysis.

1. What do TICUA institutions know about Title IX's founding purpose?
2. Do TICUA institutions understand recent changes to Title IX provisions?
3. Do TICUA institutions feel they are equipped to implement Title IX's most recent provisions?

We anticipate observing the following findings in our descriptive data analysis:

1. There will be varied levels of understanding by faculty, staff, and students about the founding purpose of Title IX at TICUA member institutions.
2. Students, faculty, staff, and administrators at TICUA member institutions have varied levels of understanding regarding the most recent changes to Title IX.
3. We will observe varied levels of "preparedness" to implement any changes that are enacted with regards to Title IX provisions among member institutions.

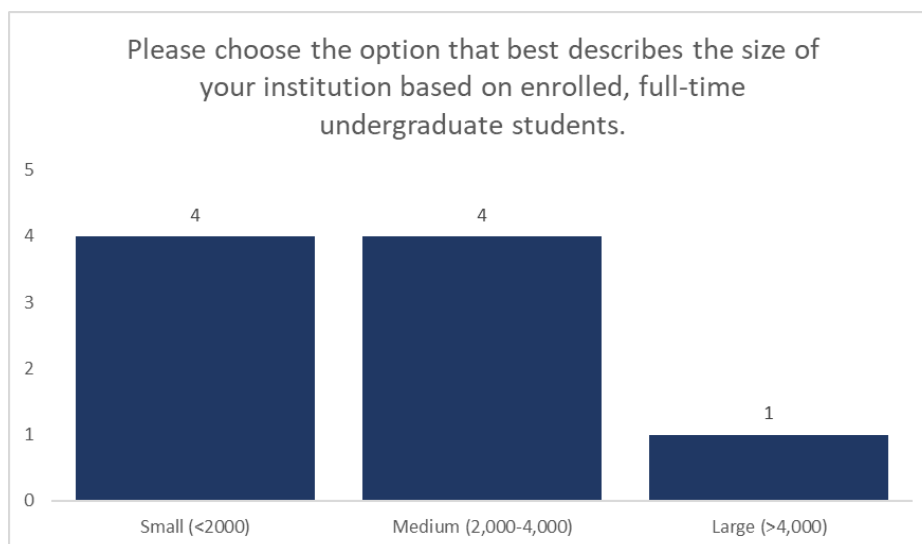
FINDINGS

A total of 13 Title IX coordinators responded to the electronic survey. Nine respondents consistently responded to the survey questions. The descriptive statistics of respondents are referenced below, followed by the initial findings from their responses. The full survey can be accessed in Appendix C.

We chose to analyze our findings within four dimensions: institution size, religious affiliation, institution setting, and its minority-serving status. We chose to utilize these dimensions to identify the variety of institutions represented in our survey with specificity while maintaining the confidentiality of the Title IX coordinators who chose to share their perspectives. Because the sample size is incredibly small, maintaining confidentiality in our data collection to every extent possible was our priority. Even with these precautions in place, four Title IX coordinators did not share their institution size, religious affiliation, setting, nor minority-serving status.

Size

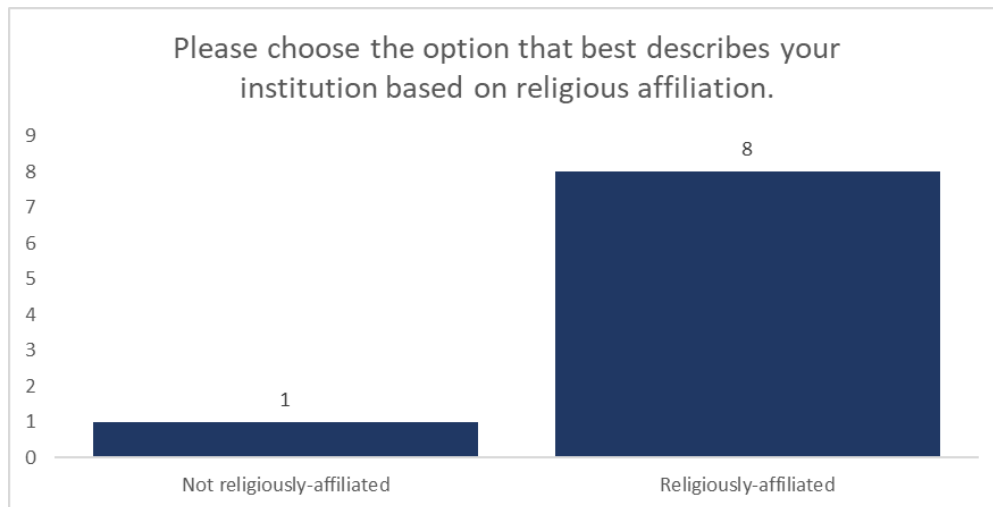
Figure 1. Size of institutions where Title IX coordinators are employed.



Four respondents are employed at small institutions (Table 1). Four respondents are employed at medium-sized institutions. One Title IX coordinators represented a large institution. Four respondents did not share their institution's size.

Religious Affiliation

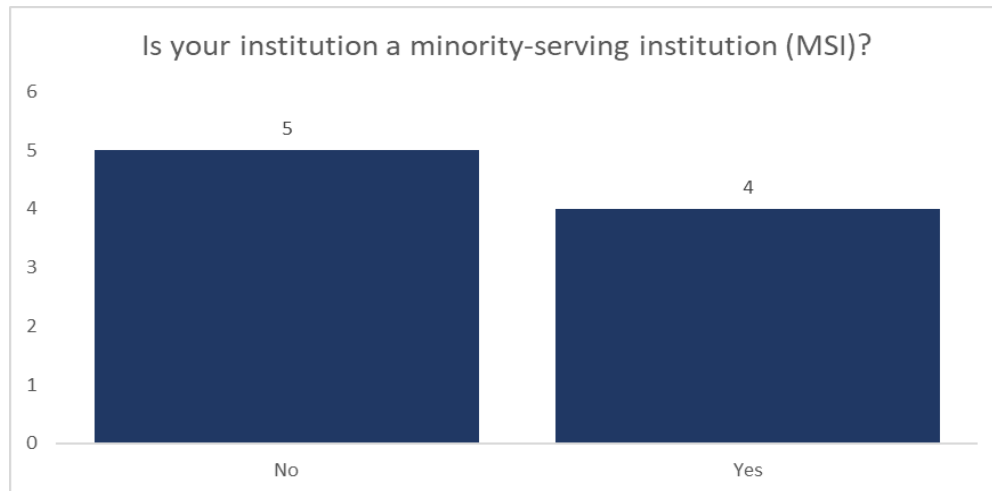
Figure 2. Religious affiliation of institutions where Title IX coordinators are employed.



It was also important to determine the religious affiliation of TICUA member institutions represented in our sample to ensure that such institutions are included, as 85% of the 28 institutions eligible for this survey are religiously affiliated. We found that most of the survey respondents work at religiously affiliated institutions (Table 2).

Minority-Serving Status

Figure 3. Minority-serving status of institutions where Title IX coordinators are employed.



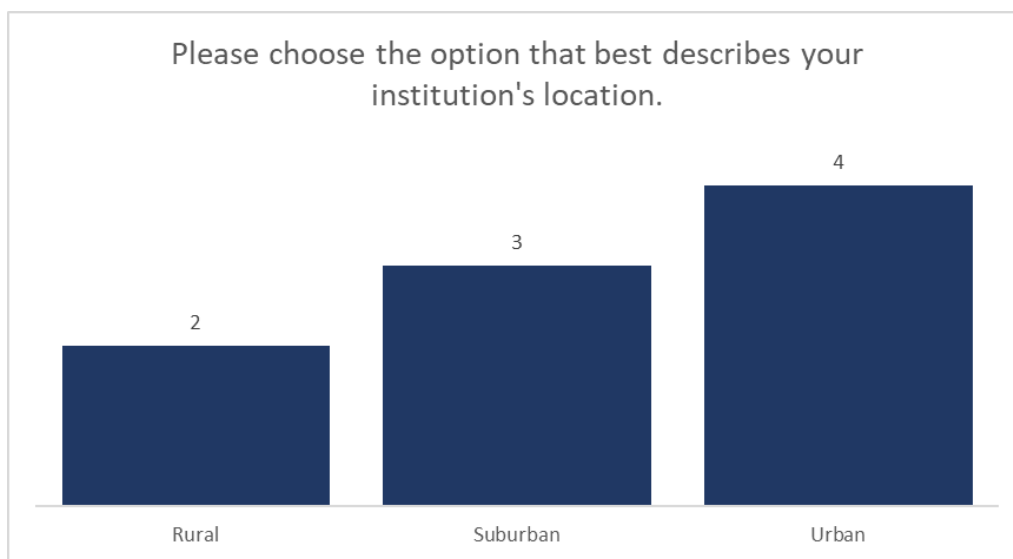
Slightly less than half of the respondents are employed at minority-serving institutions as compared to non-minority serving institutions (Table 3). We define a minority-serving institution as one of the following: Historically Black College and University (HBCU), Hispanic-Serving Institution (HSI), Tribal College and University (TCU), or Asian American and Pacific Islander Serving Institution (AAPISI), as prescribed by the Office of Civil Rights (U.S. Department of the Interior, 2022). Of the 28 TICUA member institutions eligible for this survey, approximately 17% are minority-serving institutions. We were very pleased to see representation of minority-serving institutions in our sample.

Location

Because of the geographic landscape of Tennessee, we also desired to capture the setting of the Title IX coordinators' institutions (Table 4). Due to the small sample size, we chose broad attributes to identify the institution's setting: rural, suburban, and urban. We refrained from using the specific city and region in Tennessee (i.e., Central Tennessee, Southeast Tennessee, etc.) to maintain confidentiality. Two respondents are employed at institutions located in a rural setting. Three are employed at institutions in

a suburban setting. Finally, four Title IX coordinators are employed at institutions in an urban setting. We were pleased to see this distribution represented in our findings.

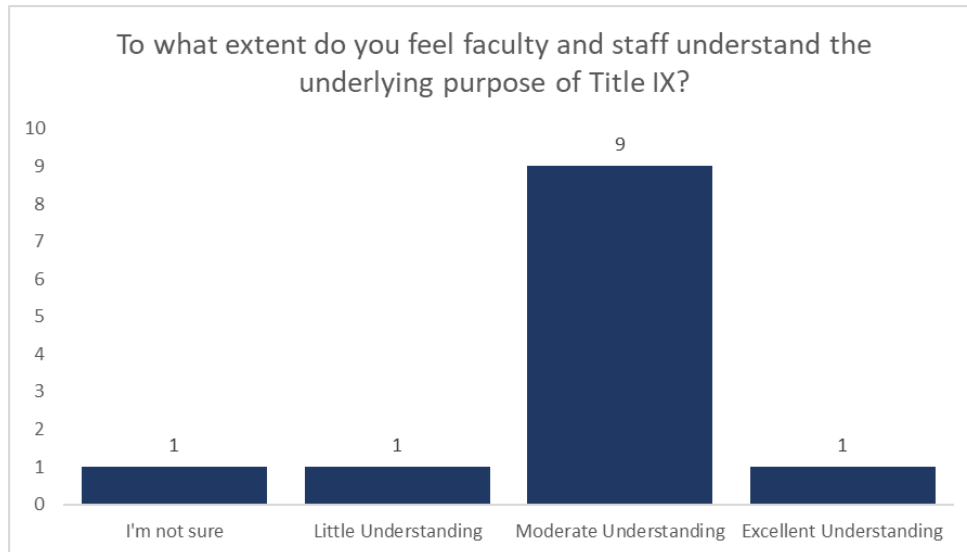
Figure 4. Location of institution where Title IX coordinators are employed.



UNDERSTANDING TITLE IX

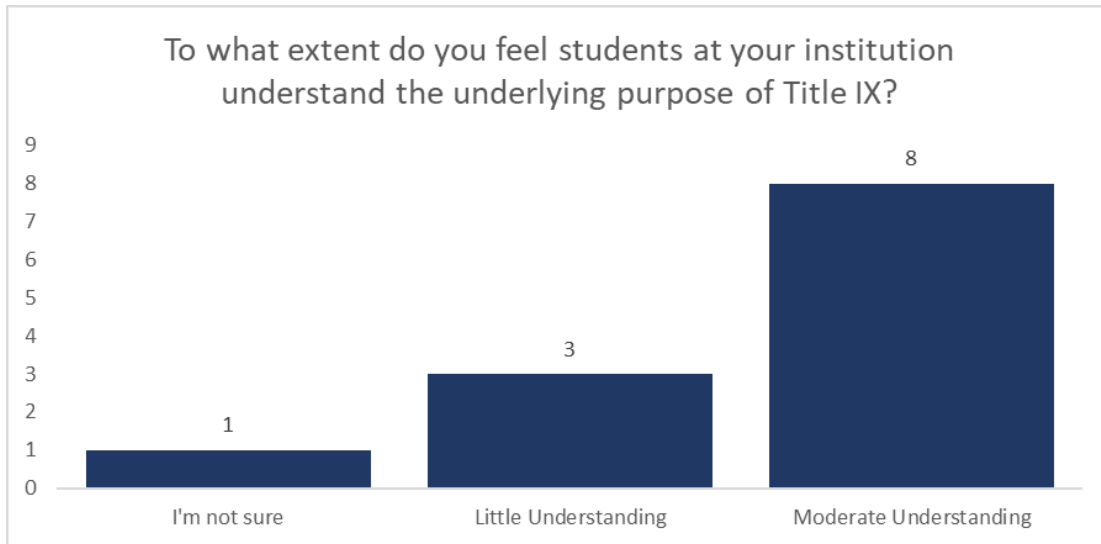
Our first survey question asks, “To what extent do you feel faculty and staff understand the underlying purpose of Title IX?” A total of 12 Title IX coordinators responded, as referenced in Table 1. The vast majority, approximately 75% of respondents (n=9), feel that faculty and staff have a “moderate understanding” of the purpose of Title IX. None of the respondents feel that faculty and staff have “no understanding” of the purpose of Title IX. “No understanding” was omitted from Figure 5 because no respondents chose this option.

Figure 5. The extent to which faculty and staff understand the underlying purpose of Title IX (n =12).



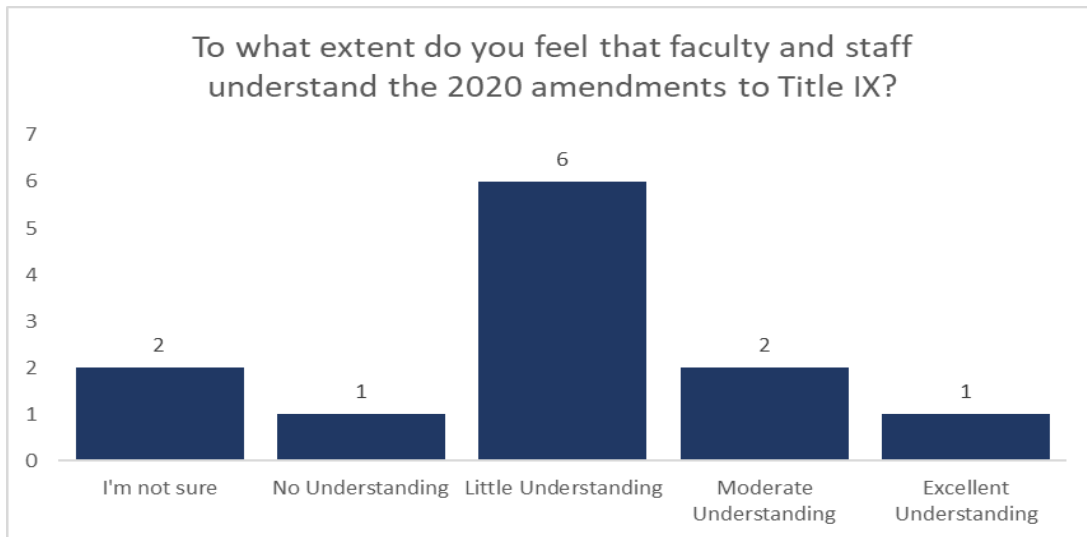
When asked about the extent to which they feel students at their institutions understand the purpose of Title IX, approximately 67% (n=8) of Title IX coordinators feel that students have a “moderate understanding” of Title IX (Figure 6). None of the respondents feel their students have neither “no understanding” or an “excellent understanding” about the purpose of Title IX. “No understanding” and “excellent understanding” were omitted from Figure 6 because no respondents chose these options.

Figure 6. The extent to which Title IX coordinators feel students understand the founding purpose of Title IX (n=12).



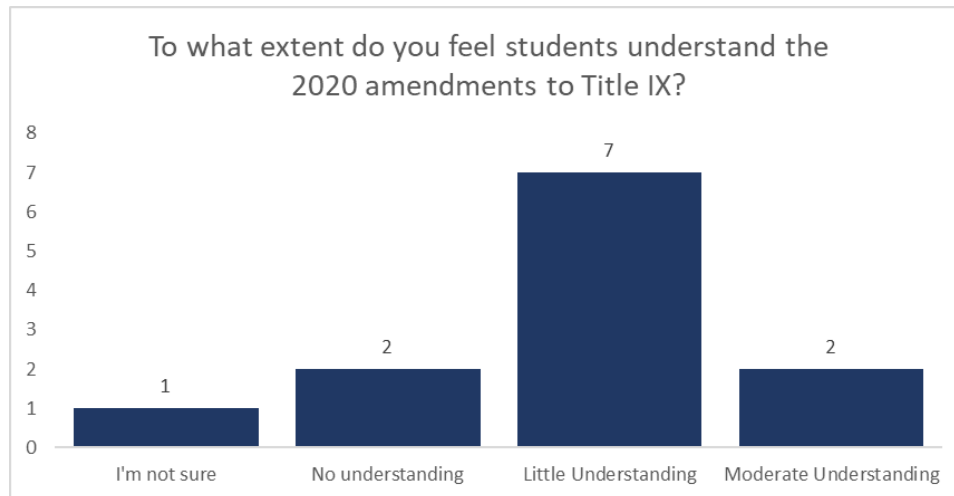
When Title IX coordinators were asked to what extent do they feel that faculty and staff understand the 2020 amendments to Title IX, various levels of understanding were observed (Figure 7). Over half of respondents (58%) feel that faculty and staff have “little” or “no” understanding about the 2020 amendments to Title IX.

Figure 7. The extent Title IX coordinators feel faculty and staff understand 2020 Title IX amendments (n=12).



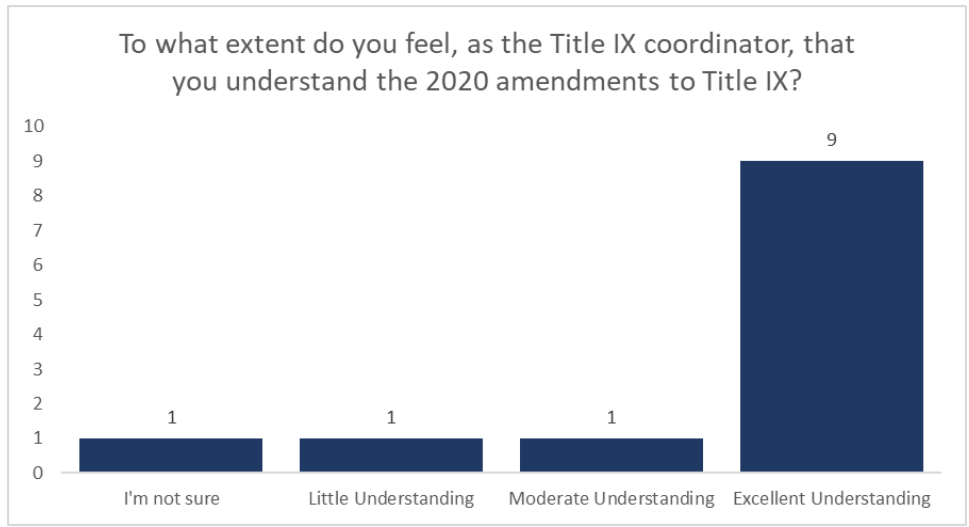
When Title IX coordinators were asked about the extent to which they feel students understand the 2020 amendments to Title IX (Figure 8), 75% (n=9) of respondents shared that they feel students have “little understanding” or “no understanding” about the recent amendments (Figure 8). None of the respondents feel that students have an “excellent understanding” of the 2020 amendments to Title IX. “Excellent understanding” was omitted from Figure 8 because no respondents chose this option.

Figure 8. The extent to which Title IX coordinators feel that students understand the 2020 amendments to Title IX (n=12).



When Title IX coordinators were asked the extent to which they personally understand the 2020 amendments to Title IX, the vast majority, 75%, (n=9) responded that they have an “excellent understanding” of the 2020 amendments (Figure 9). Although unsurprising, we were pleased that most of the Title IX coordinators feel they have an excellent understanding of Title IX amendments. However, we are aware that one Title IX coordinator has little understanding. We omitted “no understanding” from Figure 9 because no respondents chose this option.

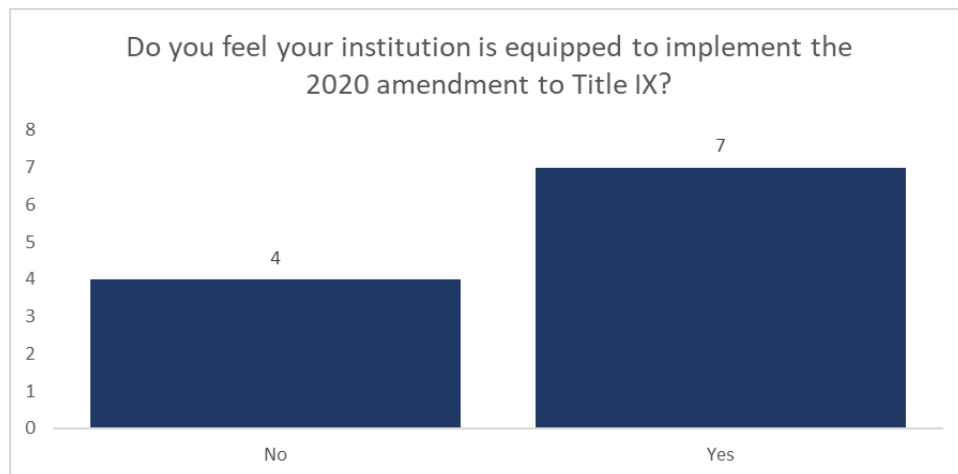
Figure 9. The extent to which Title IX coordinators feel they personally understand the 2020 amendments to Title IX (n=12).



TITLE IX IMPLEMENTATION

Seven of the eleven respondents feel that their institutions are equipped to implement the 2020 amendments to Title IX (Figure 10).

Figure 10. The extent to which Title IX coordinators feel their institution is equipped to implement 2020 amendments to Title IX (n=11).



Among the four respondents who feel that their institutions are not equipped to implement the 2020 amendments to Title IX, three of these four respondents shared additional resources that they need to implement the amendments (Figure 11). Two respondents need additional paid staff. Two respondents feel that more funding for training is needed. Two respondents feel that they need more practical guidance from the U.S. Department of Education. One respondent needs more volunteers. And one respondent added a description to the “other” category, outlining a need to hire a consultant to assist with policy revision.

Figure 11. Additional resources needed by Title IX coordinators to implement 2020 amendments (n=3).

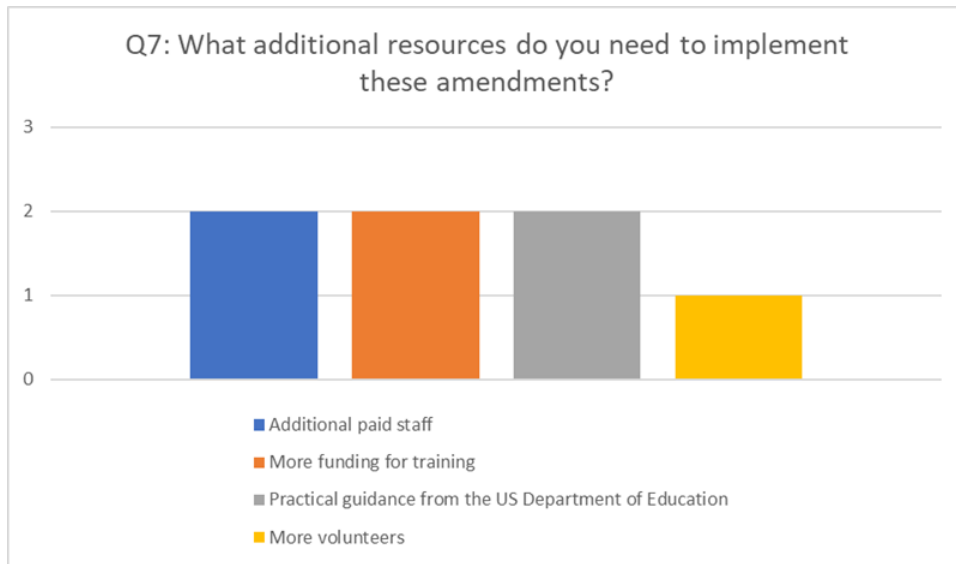
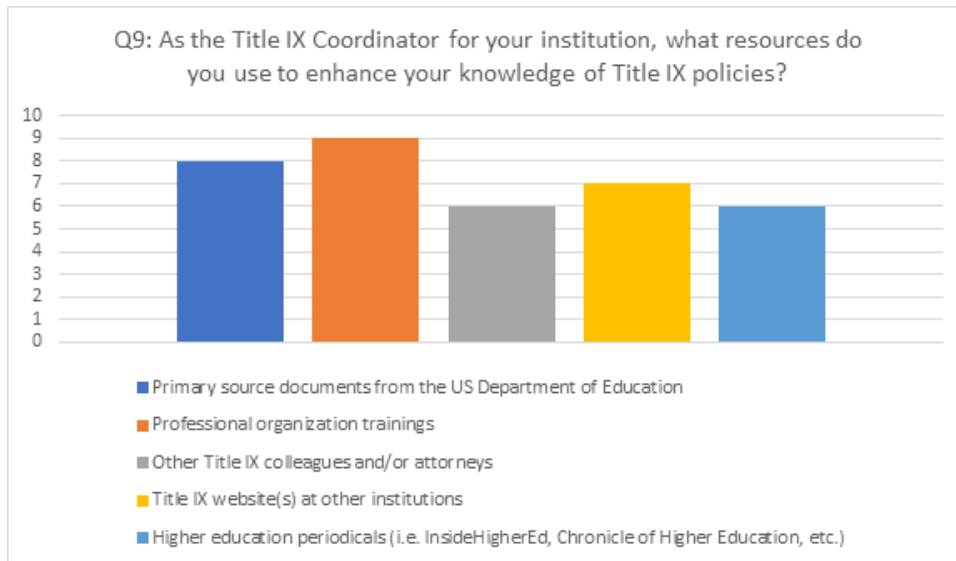


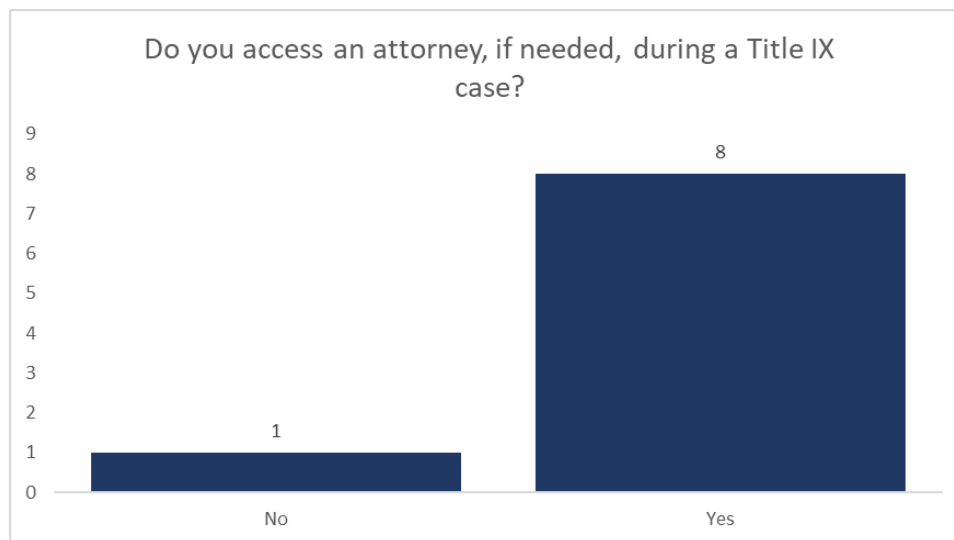
Figure 12. Sources from where Title IX coordinators enhance their knowledge about Title IX policies (n=9).



It was also important to acknowledge from where Title IX coordinators acquire their knowledge about Title IX policies. Approximately 89% (n=8) of respondents use primary source documents from the U.S. Department of Education. All the respondents (n=9) use trainings developed by professional organizations. Approximately 67% (n=6) of respondents to this question use other Title IX colleagues and/or attorneys as a resource. Approximately 78% (n=7) of respondents use Title IX website(s) at other institutions as a resource. Moreover, approximately 67% of respondents (n=6) use higher education periodicals (i.e., Inside Higher Ed, Chronicle of Higher Education, etc.) to enhance their knowledge.

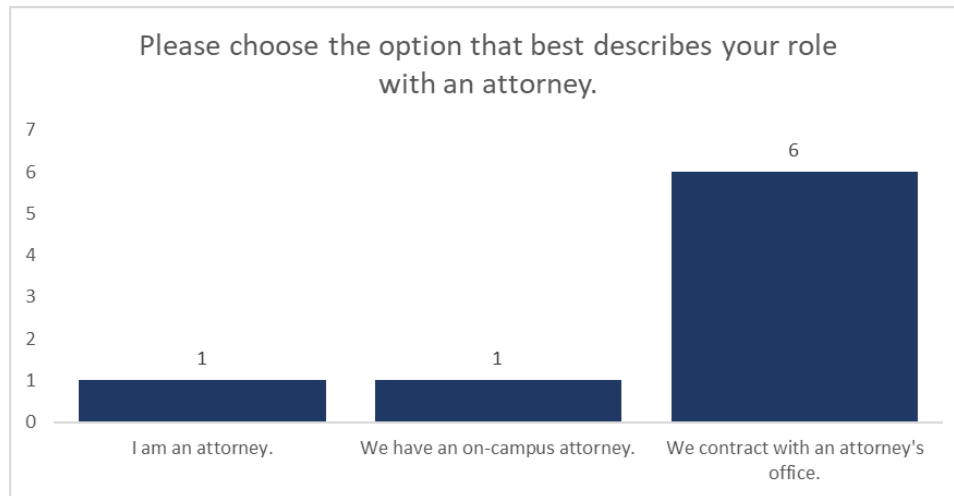
Furthermore, we desired to know if Title IX coordinators seek an attorney, if needed, during a Title IX case. We found that the vast majority of Title IX coordinators (n=8) access an attorney.

Figure 13. Title IX coordinator's access to an attorney (n=9).



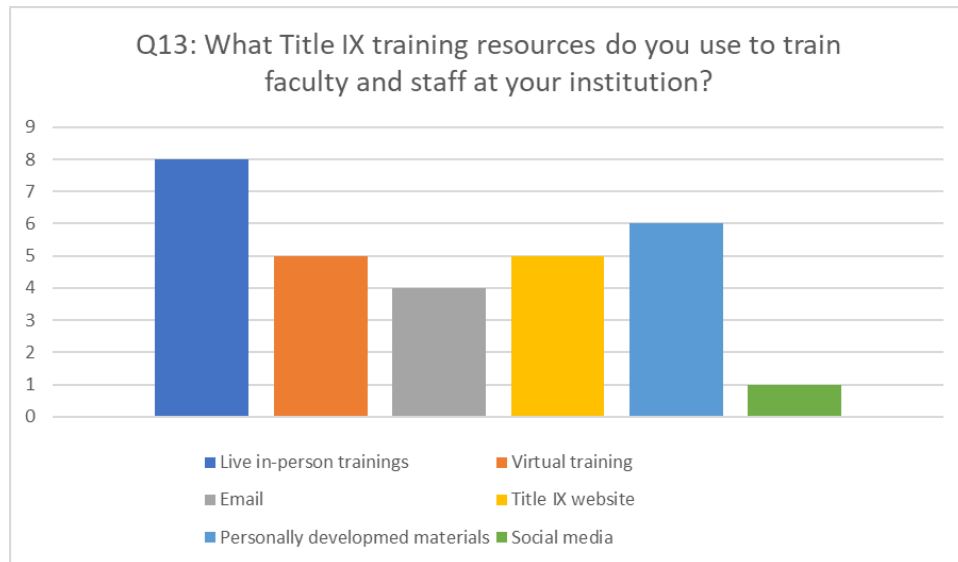
Of the respondents that access an attorney during a Title IX case, if needed, the majority (75%, n=6) contract with an attorney's office (Figure 14).

Figure 14. Title IX coordinator's relationship with an attorney (n=8).



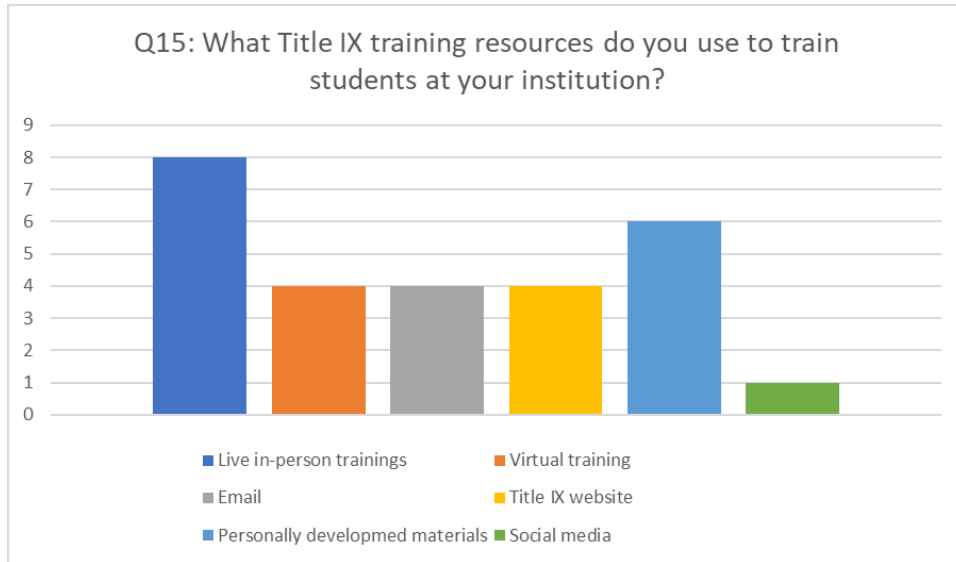
We were also curious about how Title IX coordinators train faculty and staff at their institutions about Title IX policies (Figure 15). Of the nine Title IX coordinators who responded to “what Title IX training resources do you use to train faculty and staff at your institution,” approximately 89% (n=8) of respondents use live, in-person training to train faculty and staff. Approximately 56% of respondents (n=5) use virtual trainings to train faculty and staff. Approximately 44% of respondents (n=4) use email. 75% of respondents use personally developed materials to train faculty and staff. One respondent uses social media to train faculty and staff.

Figure 15. Resources used to train faculty and staff (n=9).



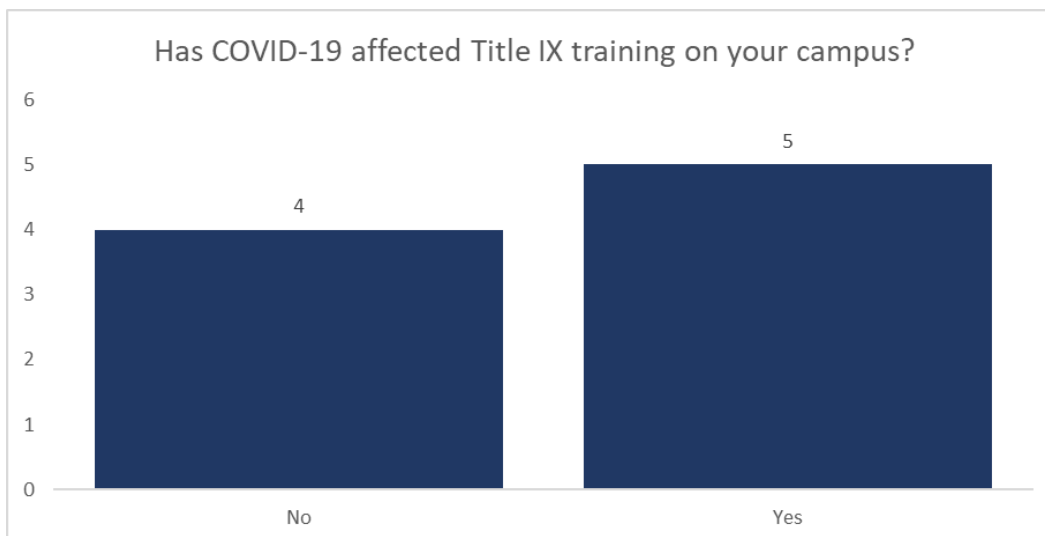
We also observed similar responses for how Title IX coordinators train students at their institutions about Title IX policies (Figure 16). Of the 9 Title IX coordinators who responded to, “what Title IX training resources do you use to train students at your institution,” approximately 89% (n=8) of respondents use live, in-person training to train students. Approximately 44% of respondents (n=4) use virtual trainings to train students. Approximately 44% of respondents (n=4) use email. Similar to the responses about faculty and staff resources, 75% (n=6) of respondents also use personally developed materials to train students as well. One respondent uses social media to train students.

Figure 16. Resources used to train students (n=9).



When Title IX coordinators were asked, “Has COVID-19 affected Title IX training on your campus,” respondents were divided in their responses (Figure 17). Approximately 44% (n=5) of Title IX coordinators reported that COVID-19 has affected their Title IX training.

Figure 17. COVID-19 effects on Title IX training (n=9).

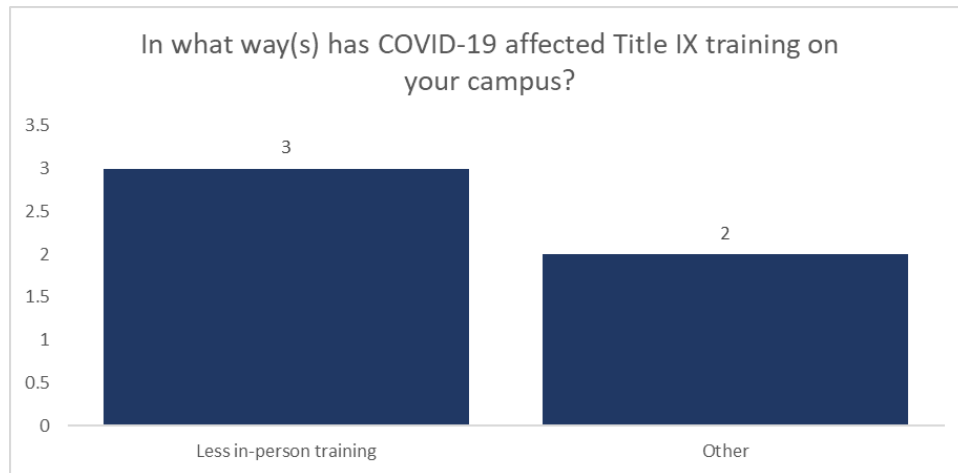


Title IX coordinators employed at minority serving institutions (n=4) unanimously reported that COVID-19 has affected Title IX training on their campuses. The majority of Title IX coordinators not employed at a minority serving institutions (n=4) felt that COVID-19 has not affected Title IX training on their campuses. One Title IX coordinator employed at a non-minority serving institution felt that COVID-19 has affected Title IX training.

Furthermore, Title IX coordinators employed at institutions in urban settings (n=4) unanimously reported that COVID-19 has affected Title IX training on their campuses. Title IX coordinators employed at institutions in suburban settings (n=3) reported that COVID-19 has not affected Title IX training. Title IX coordinators employed at institutions in rural settings (n=3) were split in their responses—one respondent reported COVID-19 affected Title IX training and the other respondent reported no effect.

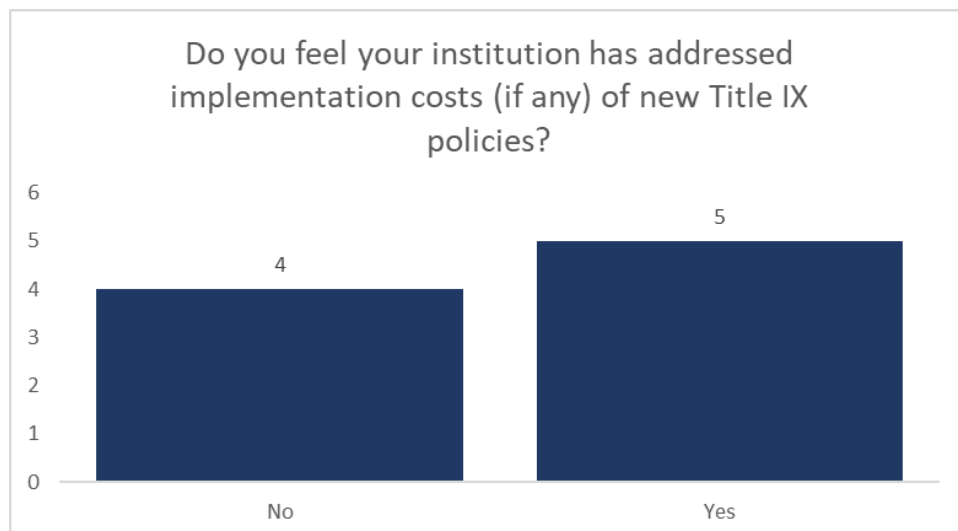
To better understand the effects of COVID-19 on Title IX trainings, we asked respondents who answered “yes” to “has COVID-19 affected Title IX training on your campus,” about the effects on Title IX training. It is important to note that there was a system error during data collection that prevented the first two respondents from being able to mark “all that apply” in their responses. The data tool was updated as soon as the error was noticed. For this reason, the data is skewed towards a single choice the two respondents made. With the error in mind, of the five respondents whose Title IX training(s) were affected by COVID-19, three respondents reported less in-person training. One respondent who chose “other” noted that training has taken a backseat because faculty and students are more focused on virtual learning.

Figure 18. COVID-19 effects on Title IX training (n=5).



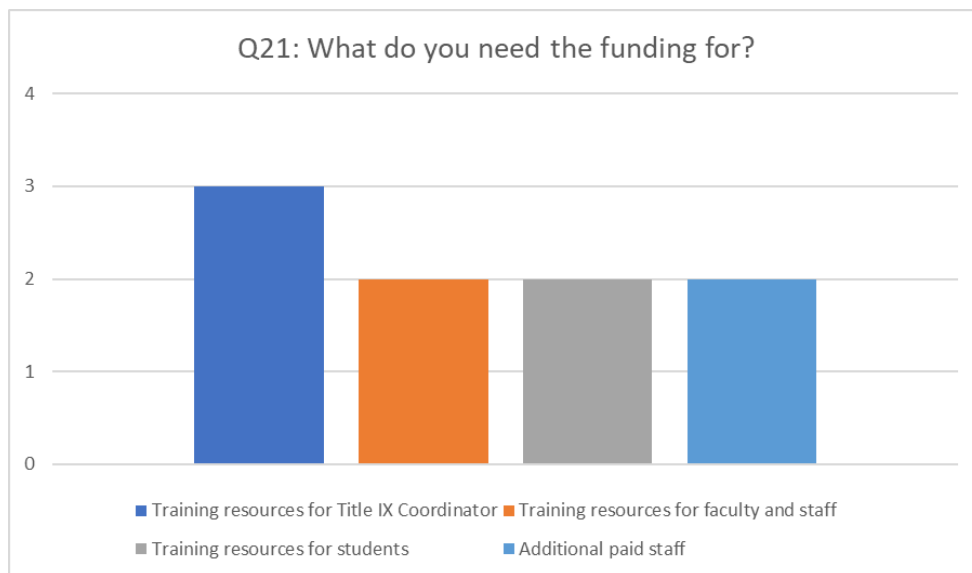
To delve more deeply into resource allocation at individual institutions, we asked respondents about their institution's response to implementation costs (Figure 19). Approximately 55% (n=5) of respondents feel that their institution has addressed implementation costs for new Title IX policies. The remaining 44% (n=4) of respondents feel that their institution has not addressed implementation costs at their institution.

Figure 19. Institution's response to implementation costs for new Title IX policies (n=9).



To better understand the additional resources needed by Title IX coordinators who answered “no” to “do you feel your campus has addressed implementation costs (if any) of new Title IX policies,” we asked them to share the resources that they need (Figure 20).

Figure 20. Resources needed by Title IX coordinators (n=4).



Of the four Title IX coordinators who responded that they needed funding, three of them noted that training resources for Title IX coordinators is needed. In addition, two respondents had a need for training resources for faculty and staff, training resources for students, and additional paid staff. Respondents were also presented with an option to share more specific needs by choosing the “other” option with an open text field. The “other” submissions included a need for training for all the roles required for Title IX and a need for outside hearing officers/investigators. One Title IX coordinator also noted that “[they] need a budget...we have never had a Title IX budget which severely limits any training, outreach, or prevention efforts.”

Figure 21. Additional institutional responsibilities concurrently held by Title IX coordinators (n=9)



It was important to understand the roles that the Title IX coordinators have in addition to their Title IX responsibilities. Eight respondents (75%) have multiple roles in addition to their Title IX coordinator role. Only one respondent has no other role in addition to their Title IX coordinator role. This respondent works at a large, religiously affiliated institution in an urban setting. We were surprised by the diversity of the institutional roles represented, especially marketing and alumni. These results clearly indicate that the Title IX Coordinator role is not considered a full-time position at some TICUA institutions. This data aligns with most recent survey conducted by the Association of Title IX Administrators that indicated that 71% of respondents indicate that their institution's Title IX coordinator has additional roles beyond Title IX coordination (2021).

Figure 22. Prior Institutional roles held by Title IX coordinators.



We then asked the Title IX coordinators what their role was prior to becoming the Title IX coordinator. The list is similar to the previous question, but we are surprised to see that three respondents reported that the Title IX coordinator role was added to their current institutional responsibilities.

DISCUSSION

WHAT DO TICUA INSTITUTIONS KNOW ABOUT TITLE IX'S FOUNDING PURPOSE?

It was not surprising to see that TICUA Title IX coordinators rated faculty and staff knowledge of Title IX higher than that of students. Nevertheless, both groups overwhelmingly fell into the “moderate understanding” category, which was encouraging to see. However, it is in the best interest of TICUA institutions to know the purpose of Title IX to ensure its efficacy on college campuses. An investment in educating students, specifically, about its founding purpose will be necessary. The Chronicle of Higher Education’s Survey on Sexual-Misconduct Prevention and Response (2020) indicated that 85% of respondent institutions were offering mandatory student training and 68% were conducting workshops with student groups. It is encouraging to see that student training is being completed at many institutions, but it would be wise to incorporate some element of Title IX history into those trainings so that students better understand why it is important.

DO TICUA INSTITUTIONS UNDERSTAND RECENT CHANGES TO TITLE IX PROVISIONS?

The 2020 Title IX amendments marked the first time in Title IX’s history when educational institution’s responsibility to respond to sexual assault and harassment allegations were defined in federal regulations, which have the force of law (Brown, 2020.) Prior to 2020, the U.S. Department of Education issued guidelines (e.g., “Dear Colleague” letters) for Title IX that were not legally binding, causing confusion among university administrators about its enforcement (Brown, 2020; New, 2016). In our appraisal of TICUA institutions, we observed varied levels of understanding about the recent changes to Title IX.

Most Title IX coordinators felt that faculty and staff have little to no understanding of the 2020 amendments to Title IX (Figure 7). Title IX coordinators also felt that students have little to no

understanding of the recent amendments (Figure 8). These observations are in contrast with the Title IX coordinators' knowledge of the amendments, as most coordinators have an excellent understanding of the amendments (Figure 9). Although we expect to see a higher level of understanding from Title IX coordinators, it is concerning that faculty, staff, and students may not have the foundational understanding of policies for which they are expected to adhere.

The gap of understanding observed for faculty, staff, and students can be explained by the chronological context when which the 2020 amendments were distributed. These amendments were distributed during the COVID-19 pandemic with very little lead time provided for implementation. In fact, colleges had fewer than 100 days to comply with the 2,000 pages of regulations (Brown, 2020). Considering this shortened timeline for implementation alongside the administrative adjustments spawned by the COVID-19 pandemic, one might start to understand why there is a gap in understanding for faculty, staff, and students, as in the case for TICUA member institutions. It is possible that university administrators are overloaded with responsibilities.

DO TICUA INSTITUTIONS FEEL THEY ARE EQUIPPED TO IMPLEMENT TITLE IX'S MOST RECENT PROVISIONS?

Although nine respondents have an excellent understanding of 2020 amendments to Title IX, only seven respondents (64%) feel that their institution is equipped to implement the 2020 amendments. Even among those who have an excellent understanding of the 2020 amendments, Title IX coordinators desire more resources to implement the changes. These resources include additional paid staff, more funding for training, more volunteers, and access to a consultant to ensure their institution is following the provisions. In fact, 44% (n=4) of respondents noted that their institution has not addressed the funding necessary to implement the recent provisions.

These observations among Title IX coordinators are aligned with the most recent survey completed by the Association for Title IX Administrators (2021), which indicated that only 57% of

respondents have a budget associated with their Title IX office/compliance efforts. 72% of respondents indicated that they have \$30,000 or less (including no budget) to work with in their Title IX offices (Association of Title IX Administrators, 2021). If resources for Title IX are limited, then it makes sense why some of the respondents would feel that they aren't as equipped as they could be to implement the regulations.

RECOMMENDATIONS FOR INSTITUTIONAL PRACTICE

I. PROVIDE DISCOUNTED (OR FREE) TITLE IX COORDINATOR TRAINING.

It is apparent that Title IX coordinators feel that training is very important as they navigate changes in regulations over the years. One solution TICUA can adopt to support Title IX coordinators is to provide training opportunities for free or a discounted rate. In fact, Title IX training provided by TICUA would not only support coordinator knowledge, but it would also connect them to each other, creating resources and connections across TICUA member institutions. This training can be hosted on a virtual platform or hosted in-person, depending on the needs of the Title IX coordinators. We believe partnering with ATIXA (Association of Title IX Administrators) to potentially negotiate access to online Title IX training at a lower cost may be a cost-friendly option. Currently, a one-year individual registration costs \$599, a one-year institutional membership costs \$2,499, and a super membership (three higher education registrations and six k-12 school/district registrations) costs \$4,999 (ATIXA, 2022). We believe it can be helpful to explore and negotiate a super membership for 34 members institutions for TICUA.

II. INCREASE ACCESS TO AN ON-CALL ATTORNEY VIA TICUA PARTNERSHIP.

Next, most of the respondents indicated that they contract with an attorney if legal advice is needed. TICUA may want to investigate the possibility of attorney access as a group, sharing

knowledgeable attorneys and perhaps reducing the cost if negotiating a group rate. Distributing the costs of billable hours for Title IX coordinators would benefit the TICUA institutions by reducing costs and removing a barrier to helpful information (June, 2014).

III. CONSIDER SOCIAL MEDIA AS A TOOL TO TRAIN STUDENTS, FACULTY, AND STAFF.

One Title IX coordinator utilized social media as a tool to educate people at their institution. It would be wise to investigate how social media is utilized by this respondent and the approach could be shared with other TICUA Title IX coordinators as an additional, low-cost educational approach. In 2010, the U.S. Department of Education released its National Technology Plan “to create engaging, relevant, and personalized learning experiences for all learners that mirror students’ daily lives and the reality of their futures” (U.S. Department of Education, 2010, p. 4, as cited in Delello, McWhorter, and Camp). Although the majority of respondents did not mention a specific use of social media, we believe establishing a regular, in-person or digital brainstorm meeting supported by TICUA will be helpful for Title IX coordinators to refresh and define the communication methods through which Title IX regulations are shared.

IV. INCREASE ADMINISTRATIVE SUPPORT TO TITLE IX COORDINATORS.

The list of additional institutional responsibilities that Title IX coordinators have on top of their very important Title IX work is an indication that most TICUA institutions do not see Title IX coordination as a full-time position. We know that Title IX coordinators on a national scale are experiencing institutional constraints to elevate the Title IX role to full-time status (June, 2014). This observation was also evident in our appraisal of Title IX coordinators employed at TICUA member institutions (see *Figure 21* and *Figure 22*). The more advocacy that TICUA can provide for Title IX coordinators on the national level (e.g., National Association of Independent Colleges and Universities),

the more external support TICUA Title IX coordinators can generate to advocate for more administration support on their campuses. Ultimately, we hope this level of advocacy from TICUA will help senior administrators at TICUA member institutions understand the local and national need for Title IX administrative support. Providing this type of support (e.g., additional paid staff, volunteers) to Title IX coordinators has the potential to alleviate administrative pressure points and to encourage more focused time on their important work to support faculty, staff, and students in a Title IX compliant environment.

V. PROVIDE ADDITIONAL ADMINISTRATIVE SUPPORT TO MINORITY-SERVING INSTITUTIONS.

TICUA would be well advised to provide additional support to minority serving institutions (MSIs) in their educational efforts to adhere to new Title IX amendments. On a national scale, Historically Black Colleges and Universities (HBCUs) have faced increased pressure beyond the Title IX landscape since the 2020 Amendments were released (Guy & Sheftall & Jackson, 2021). In addition to aligning university policy with new Title IX requirements, HBCUs have been inundated by the national response about racial profiling and violence by law enforcement as well as the enduring effects of the COVID-19 pandemic (Gavazzi, 2020). HBCUs also serve students who have been disproportionately affected by the COVID-19 pandemic and the racial climate in America (Guy-Sheftall & Jackson, 2021).

Furthermore, in February 2022, HBCUs around the U.S. have received numerous bomb threats and vandalization on their campuses (DeBerry, 2022). Shortly thereafter, Vice President Kamala Harris and the U.S. Department of Education announced their collective commitment to support HBCUs via grant funds under the Project School Emergency Response to Violence program as it relates to campus learning disruption (U.S. Department of Education, 2022). We believe TICUA can serve as a central hub of information to connect HBCUs (and all MSIs) to additional funding or grants opportunities aimed to support training for students, faculty, and staff.

LIMITATIONS

There are some limitations that warrant discussion in our study. These limitations temper our discussion, conclusions, and recommendations. First, the small sample size is important to note. Out of 28 individuals in our sample, we received nine completed surveys and three additional partially completed surveys. Therefore, we cannot generalize our findings to the population of Title IX coordinators at TICUA member institutions that serve undergraduate students.

It is also important to note that the informational interviews conducted to inform our electronic survey were not randomly selected from the pool of 28 Title IX coordinators. They were Title IX coordinators who were willing to be interviewed and came from a group of five coordinators that were pre-selected by the President of TICUA, Dr. Claude Pressnell. It is possible that other coordinators might have discussed different issues and informed our survey in different ways.

Lastly, we were limited in the amount of current research that exists regarding Title IX. Although many Title IX legal cases have been written about and reported on, there are very few studies that focus on Title IX coordinators and their approach to handling changing Title IX regulations. This lack of research limited our study and how we understand the results we received.

FURTHER RESEARCH

Further research centered on Title IX coordinators and their institutional experiences is necessary. Very little research centered on the Title IX coordinator role exists and we believe elevating and understanding their experiences is inextricably tied to how students, faculty, and staff respond to new Title IX regulations. Oftentimes, peer-reviewed research, court cases, and higher education periodicals focus on the content of Title IX policies and policy malpractice by students, faculty, and staff. Although these experiences are important, they do not focus on how coordinators are supported to adapt to regulation changes implemented by the U.S. Department of Education.

Because the sample size of this study was too small to provide conclusive results, it is wise to consider surveying Title IX coordinators at a larger level via partnerships with national organizations such as the National Association of Independent Colleges and Universities (NAICU). We anticipate that NAICU, the national affiliate of TICUA, can provide access to a broader base of Title IX coordinators at independent institutions. We hope this partnership will increase the number of respondents, improving the chances to produce results with statistical significance.

We believe the four dimensions of analysis—institution size, setting, minority-serving status, and religious affiliation—can be used as guide in this larger study. Ultimately, we desire to understand if the differences in responses are statistically significant and why those differences exist. For example, from the Title IX coordinator’s perspective, students at minority-serving institutions have little-to-no understanding of the 2020 amendments. Students at non-minority serving institutions reported in the little-to-moderate range of understanding. For future research, it will be important to explore if this difference is observed between minority-serving and non-minority-serving institutions beyond the TICUA network.

We also feel that it would be important to explore the difference in understanding the 2020 amendments for religiously affiliated institutions and non-religiously affiliated institutions (Table 18). Edwards, Sessarego, and Schmidt note that small, religious institutions may be in most need of technical

assistance and/or additional resources regarding Title IX knowledge (2019). Understanding the reason why this difference exists for religious institutions within the TICUA network (and other NAICU affiliates) presents another opportunity for future research.

Lastly, it will be important to include public university Title IX coordinators as well, to understand if there are differences between public and private universities and their approaches to education and adjustments in regulations. We believe affiliates of NAICU, such as TICUA, should consider partnership with state-level higher education commissions and/or boards to collaborate in this research.

CLOSING THOUGHTS

Title IX regulations are constantly changing, requiring Title IX coordinators to adapt and adjust their practices and adequately train faculty, staff, and students to adhere to those requirements. In fact, we expect new adaptations very soon, as it has been announced that new guidelines will be introduced in May 2022. More can be done to support Title IX coordinators as they try to adapt to changes in regulations and keep their campuses compliant. Evaluating these needs on an annual basis is necessary.

REFERENCES

- About TICUA*. (n.d.) TICUA: Tennessee Independent Colleges and Universities Association. Retrieved June 28, 2021, from <https://ticua.org/page/about>
- Anderson, G. (2020, May 7). *U.S. publishes new regulations on campus sexual assault*. Inside Higher Ed. <https://www.insidehighered.com/news/2020/05/07/education-department-releases-final-title-ix-regulations>.
- Anderson, P., & Osborne, B. (2008). historical review of title ix litigation. *Journal of Legal Aspects of Sport*, 18(1), 127-168.
- Association of Title IX Administrators. (2021). *2021 State of the field survey summary*. <https://cdn.atixa.org/site-media/atixa/wp-content/uploads/2021/12/16135903/2021-Survey-Summary.pdf>
- Association of Title IX Coordinators (2021). Why join ATIXA? <https://www.atixa.org/member-services/>
- Brown, S. (2020, August 13). *Colleges had 3 months to overhaul sexual misconduct polices. Now they're scrambling*. <https://www.chronicle.com/article/colleges-had-three-months-to-overhaul-sexual-misconduct-policies-now-theyre-scrambling>
- Brown, S. (2015, July 9). *Many Title IX coordinators are new to the job and juggling many duties*. The Chronicle of Higher Education. <https://www.chronicle.com/article/many-title-ix-coordinators-are-new-to-the-job-and-juggling-many-duties/>
- Buchanan, M. (2012). Title ix turns 40: brief history and look forward. *Texas Review of Entertainment & Sports Law*, 14(1), 91-94.

Chronicle of Higher Education. (2020). *Sexual-misconduct prevention and response: Where do institutions stand in 2020?* https://connect.chronicle.com/rs/931-EKA-218/images/WestPoint_091520_survey.pdf

College Board (2022). Campus setting: Rural, suburban, urban. BigFuture.

<https://bigfuture.collegeboard.org/plan-for-college/college-basics/types-of-colleges/campus-setting-rural-suburban-urban>

Davis v. Monroe County Board of Education, [97-843] 526 U.S. 629 (1999)

DeBerry, J. (2022, February 5). *HBCU bomb threats are the latest racist response to Black success.*

MSNBC. <https://www.msnbc.com/opinion/hbcu-bomb-threats-are-latest-racist-response-black-success-n1288687>

Delello, J.A., McWhorter, R.R., & Camp, K.M. (2015). Using social media as a tool for learning: A multi-disciplinary study. *International Journal on E-Learning* https://www.utt Tyler.edu/soules-college-of-business/files/camp_regents/using-social-media-as-a-tool-for-learning.pdf

Dunkle, M. (1974). *What constitutes equality for women in sport? Federal law puts women in the running.* Association of American Colleges, Project on the Status of Education of Women. Washington D.C.

Education Amendments Act of 1972, 20 U.S.C. §1681 et seq

Edwards, K. M., Sessarego, S. N., & Schmidt, M. H. (2019). The kids are alright (mostly): An empirical examination of Title IX knowledge in institutions of higher education. *Psychology of violence*, 9(4), 431.

Franklin v. Gwinnett County Public Schools, 503 U.S. 60 (1992)

- Galemore, G.L. (2004, March 4). Title IX and Sex Discrimination in Education: An Overview, report, Washington D.C. University of North Texas Library: UNT Libraries Government Documents Department. <https://digital.library.unt.edu/ark:/67531/metadc855767/>.
- Gavazzi, S.M. (2020, June 8). *George Floyd's Death and COVID-19 Put Black Universities in the Spotlight*. Forbes. <https://www.forbes.com/sites/stephengavazzi/2020/06/08/george-floyds-death-and-covid-19-put-black-universities-in-the-spotlight/?sh=379097c45927>
- Gebser v. Lago Vista Independent School District*, [96-1866] 106 F.3d 1223 (1998).
- Grossman, H. (1998). *Achieving educational equality: Assuring all students an equal opportunity in school*. Springfield: Charles C. Thomas Publisher, Ltd.
- Guy-Sheftall, B. & Jackson, K.M. (2021, Spring). *Challenges and Possibilities at HBCUs after the COVID-19 Pandemic*. American Association of University Professors. <https://www.aaup.org/article/challenges-and-possibilities-hbcus-after-covid-19-pandemic#.YnMF1drMJD8>
- James, K. (2010, April 20). *Obama returns Title IX gender law to pre-Bush standard*. NPR. https://www.npr.org/sections/thetwo-way/2010/04/obama_returns_title_ix_gender.html
- June, A.W. (2014, October 31). *Overseeing sex-assault cases is not a full-time job*. Chronicle of Higher Education. <https://www.chronicle.com/article/overseeing-sex-assault-cases-is-now-a-full-time-job/>
- Lieberwitz, R. L., Jaleel, R., Kelleher, T., Scott, J. W., Young, D., Reichman, H., Sisson Runyan, A., & Levy, A. (2016). The history, uses, and abuses of Title IX. *Academe*, 102(4), 69-99.
- Madigan, J.C. (2009). The education of girls and women in the United States: A historical perspective. *Advances in Gender and Education*, 1, 11-13.

- Melnick, R. (2020, June 11). Analyzing *the Department of Education's final Title IX rules on misconduct*. Brookings. <https://www.brookings.edu/research/analyzing-the-department-of-educations-final-title-ix-rules-on-sexual-misconduct/>
- New, J. (2016, February 25). *Must vs. Should*. Inside Higher Ed. <https://www.insidehighered.com/news/2016/02/25/colleges-frustrated-lack-clarification-title-ix-guidance>
- Redden, E. (2021, July 31). *Judge Strikes Down Provision of Title IX Rule*. Inside Higher Education. <https://www.insidehighered.com/quicktakes/2021/07/30/judge-strikes-down-provision-title-ix-rule>
- Riordan, C. (1990). *Girls and boys in school: Together or separate?* New York: Teachers College Press.
- Sadker, M., & Sadker, D. (1995). *Failing at Fairness: How our schools cheat girls*. New York: Touchstone.
- Sandler, B. (2007). Title IX: How we got it and what difference it made. *Cleveland State Law Review*, 55(4), 473-490.
- Tennessee Independent Colleges and Universities Association. (2021, December). *TICUA Fall 2021 Characteristics: The Fact Book on Tennessee's Independent Colleges and Universities*. https://cdn.ymaws.com/ticua.org/resource/resmgr/attachments/characteristics_fall_2021.pdf
- Tennessee Independent Colleges and Universities Association (2021). *2021 Case Statement: Private Colleges Serving Tennessee*. https://cdn.ymaws.com/ticua.org/resource/resmgr/attachments/ticua-case-statement-21-web_.pdf
- U.S. Department of Education (2022, March 16). *U.S. Department of Education announces action to support HBCU response to bomb threats*. <https://www.ed.gov/news/press-releases/us-department-education-announces-action-support-hbcu-response-bomb-threats>

U.S. Department of Education. (2021, May 5). *Title IX and sex discrimination*.

https://www2.ed.gov/about/offices/list/ocr/docs/tix_dis.html

U.S. Department of Education (2011, April 4). [Dear colleague: from Assistant Secretary for Civil

Rights, Russlyn Ali]. <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>

U.S. Department of Education (2010, April 20). [Dear colleague letter from Russlynn Ali, Assistant Secretary Office for Civil Rights]. [https://www2.ed.gov/about/offices/list/ocr/letters/colleague-](https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100420.pdf)

[20100420.pdf](https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100420.pdf)

U.S. Department of Education (2010). *Transforming American Education: Learning Powered by Technology*. National Education Technology Plan, 2010. US Department Of Education.

U.S. Department of Education (2005). *Additional clarification of intercollegiate athletics policy: three-part test—part three*. Office for Civil Rights.

<https://www2.ed.gov/about/offices/list/ocr/letters/200503017-additional-clarification-three-part-test.pdf>

U.S. Department of Education (1997). *Sexual Harassment Guidance: Harassment of Students*

by School Employees, Other Students, or Third Parties, 4000-01-P(1997). Office for Civil Rights. <http://www.ed.gov/about/offices/list/ocr/docs/sexharOO.html>.

U.S. Department of Education (1997). *Title IX: 25 years of progress*. Office for Civil Rights. p. 3-28.

U.S. Department of the Interior (2022). *Minority Serving Institutions Program*. Office of Civil Rights. [https://www.doi.gov/pmb/eeo/doi-minority-serving-institutions-](https://www.doi.gov/pmb/eeo/doi-minority-serving-institutions-program#:~:text=MSIs%20are%20institutions%20of%20higher,whereas%20others%20serve%20urban%20neighborhoods)

[program#:~:text=MSIs%20are%20institutions%20of%20higher,whereas%20others%20serve%20urban%20neighborhoods](https://www.doi.gov/pmb/eeo/doi-minority-serving-institutions-program#:~:text=MSIs%20are%20institutions%20of%20higher,whereas%20others%20serve%20urban%20neighborhoods).

Valentine, I. (1997). *Title IX: A brief history*. *Women's Educational Equity Act Publishing Center Digest*.

APPENDICES

Appendix A: TICUA Member Institutions

SIZE

Small (<2,000 students)	Medium (2,000-4,000 students)	Large (4,000< students)
<p>American Baptist College</p> <p>Aquinas College</p> <p>Baptist Health Sciences University</p> <p>Bryan College</p> <p>Christian Brothers University</p> <p>Fisk University</p> <p>Johnson University</p> <p>King University</p> <p>Lane College</p> <p>Lee University</p> <p>Maryville College</p> <p>Meharry Medical College</p> <p>Middle TN School of Anesthesia</p> <p>Milligan University</p> <p>Rhodes College</p> <p>Sewanee: The University of the South</p> <p>Southern College of Optometry</p> <p>Tennessee Wesleyan University</p> <p>Tusculum University</p> <p>Welch College</p> <p>William R. Moore College of Technology</p> <p>Williamson College</p>	<p>Bethel University</p> <p>Carson-Newman University</p> <p>Cumberland University</p> <p>Freed-Hardeman University</p> <p>Southern Adventist University</p> <p>Trevecca Nazarene University</p> <p>Union University</p>	<p>Belmont University</p> <p>LeMoyne-Owen College</p> <p>Lincoln Memorial University</p> <p>Lipscomb University</p> <p>Vanderbilt University</p>

Source: TICUA (2021), 2021 Case Statement: Private Colleges Serving Tennessee

Institutions omitted from the study are highlighted in red.

RELIGIOUS AFFILIATION

Religiously Affiliated

American Baptist College
 Aquinas College
 Baptist Health Sciences University
 Belmont University
 Bethel University
 Bryan College*
 Carson-Newman University
 Christian Brothers University
 Freed-Hardeman University
 Johnson University
 King University
 Lane College
 LeMoyne-Owen College
 Lee University
 Lipscomb University
 Maryville College
 Milligan University
 Rhodes College
 Sewanee: The University of the South
 Southern Adventist University
 Tennessee Wesleyan University
 Trevecca Nazarene University
 Tusculum University
 Union University
 Welch College

Not Religiously Affiliated

Cumberland University
 Fisk University
Meharry Medical College
 Lincoln Memorial University
 Southern College of Optometry
Williamson College
Middle TN School of Anesthesia
William R. Moore College of Technology
Vanderbilt University

As defined by the College Board's BigFuture definition, 2022 | <https://bigfuture.collegeboard.org/plan-for-college/college-basics/types-of-colleges/campus-setting-rural-suburban-urban>

Institutions omitted from the study are highlighted in red.

*denotes nondenominational

MINORITY-SERVING STATUS

Minority-Serving Status

American Baptist College
 Fisk University
 Lane College
 LeMoyne-Owen College
 Meharry Medical College
 Southern Adventist University

Not Minority Serving

Aquinas College
 Baptist Health Sciences University
 Belmont University
 Bethel University
 Bryan College
 Carson-Newman University
 Christian Brothers University
 Cumberland University
 Freed-Hardeman University
 Johnson University
 King University
 Lee University
 LeMoyne-Owen College
 Lincoln Memorial University
 Lipscomb University
 Maryville College
 Middle TN School of Anesthesia
 Milligan University
 Rhodes College
 Sewanee: The University of the South
 Southern College of Optometry
 Tennessee Wesleyan University
 Trevecca Nazarene University
 Tusculum University
 Union University
 Welch College
 Vanderbilt University
 William R. Moore College of Technology
 Williamson College

As defined by the Office for Civil Rights, Department of Education, 2022 | <https://www.doi.gov/pmb/eo/doi-minority-serving-institutions-program>

Institutions omitted from the study are highlighted in red.

SETTING

Rural

Bethel University
 Bryan College
 Carson-Newman University
 Freed-Hardeman University
 Johnson University
 Maryville College
 Middle TN School of Anesthesia
 Sewanee: The University of the South
 Southern Adventist University
 Tennessee Wesleyan University

Suburban

Aquinas College
 Cumberland University
 King University
 Lee University
 Milligan University
 Tusculum University
 Union University
 Welch College
 Williamson College

Urban

American Baptist College
 Baptist Health Sciences University
 Belmont University
 Christian Brothers University
 Fisk University
 Lane College
 LeMoyne-Owen College
 Lincoln Memorial University
 Lipscomb University
 Meharry Medical College
 Rhodes College
 Southern College of Optometry
 Trevecca Nazarene University
 William R. Moore College of
 Technology
 Vanderbilt University

As defined by the College Board's BigFuture definition, 2022 | <https://bigfuture.collegeboard.org/plan-for-college/college-basics/types-of-colleges/campus-setting-rural-suburban-urban>

Institutions omitted from the study are highlighted in red.

Appendix B: Informational Interview Protocol

Introduction of Project to Participants (Script)

This interview is one of several interviews we are conducting as a part of an exploratory study about how TICUA member institutions understand Title IX's history and the impact of recent regulation policies from the U.S. Department of Education on their campuses. TICUA has been uniquely successful in voicing concerns on behalf of TICUA member institutions to best support the needs of staff, faculty, and students. We hope your experiences and insight will help us understand how universities have been approaching recent changes to Title IX policies.

Opening Question:

Walk me through the moment when you became aware that new Title IX provisions, as they relate to sexual misconduct and discrimination, are to be implemented on your campus?

Question 1: *What are your biggest challenges with Title IX implementation?*

Question 2: *If changes need to be made, is additional funding necessary? If so, where does the funding come from? How do you request funding?*

Question 3: *How do you communicate changes to Title IX to your community?*

- *Students?*
- *Faculty?*
- *Staff?*

i.e. Is the communication method different for each group?

Question 4: *Are there additional resources that you wish you had available to you to implement new Title IX policies? If yes, please elaborate.*

Closing Question (If Necessary)

As we near the end of the interview...

- *Is there anything else you'd like to share about that we haven't touched on yet?*

Thank you for taking time from your busy day to meet with me. Janessa/Jessica and I are extremely grateful for your transparency and honesty as you shared your professional and personal journey with us. Please know that your responses will remain confidential and we will use pseudonyms for you and for the University. Are there any last questions I can answer for you?

Appendix C: Electronic Survey Questions

What do TICUA institutions know about Title IX's founding purpose?

1. To what extent do you feel faculty and staff understand the underlying purpose of Title IX's? (rate 1-5: 1=I'm not sure, 2=no understanding, 3=little understanding, 4=moderate understanding, 5=excellent understanding)
2. To what extent do you feel students at your institutions understand the underlying purpose of Title IX? (rate 1-5: 1=I'm not sure, 2=no understanding, 3=little understanding, 4=moderate understanding, 5=excellent understanding)

Do TICUA institutions understand recent changes to Title IX's provisions?

3. To what extent do you feel that faculty and staff understand the 2020 amendments to Title IX? (rate 1-5: 1=I'm not sure, 2=no understanding, 3=little understanding, 4=moderate understanding, 5=excellent understanding)
4. To what extent do you feel students understand the 2020 amendments to Title IX? (rate 1-5: 1=I'm not sure, 2=no understanding, 3=little understanding, 4=moderate understanding, 5=excellent understanding)
5. To what extent do you feel, as the Title IX coordinator, that you understand the 2020 amendments to Title IX? (rate 1-5: 1=I'm not sure, 2=no understanding, 3=little understanding, 4=moderate understanding, 5=excellent understanding)

Do TICUA institutions feel they are equipped to implement Title IX's most recent provisions?

6. Do you feel your institution is equipped to implement the 2020 amendments to Title IX? (yes=1/no=0)
7. (If no) What additional resources do you need to implement these amendments?
 - a. More volunteers
 - b. Additional paid staff
 - c. More funding for training
 - d. Practical guidance from U.S. Department of Education
 - e. Other _____
8. As the Title IX Coordinator for your institution, what resources do you use to enhance your knowledge of Title IX policies? (choose all that apply)
 - a. Primary Source Documents from the U.S. Department of Education
 - b. Professional organization trainings
 - c. Other Title IX colleagues and/or attorneys
 - d. Title IX website(s) at other institutions
 - e. Higher education periodicals (i.e. InsideHigherEd, Chronicle of Higher Education, etc.)
 - f. Other _____
9. Do you access an attorney, if needed, during a Title IX case? (yes/no)
10. (If yes) Please choose the option that best describes your role with an attorney.
 - a. I am an attorney
 - b. We have an on campus attorney
 - c. We contract with an attorney office
 - d. Other _____
11. What Title IX training resources do you use to train faculty and staff at your institution? (choose all that apply)
 - a. Live in person trainings
 - b. Virtual trainings
 - c. Email

- d. Title IX website
 - e. Personally developed materials
 - f. Social media
 - g. Other _____
12. What Title IX training resources do you use to train students at your institution? (choose all that apply)
- a. Live in person trainings
 - b. Virtual trainings
 - c. Email
 - d. Title IX website
 - e. Personally developed materials
 - f. Social media
 - g. Other _____
13. Has COVID-19 affected Title IX training on your campus? (yes=1/no=0)
14. (If yes) In what way(s) has/have COVID-19 affected Title IX training on your campus? (choose all that apply)
- a. More in-person training
 - b. Less in-person training
 - c. More virtual training
 - d. Less virtual training
 - e. Other _____
 - f. If you would like to elaborate, please share _____.
15. Do you feel your institution has addressed implementation costs (if any) of new Title IX policies. (yes/no)
16. (If no) What do you need the funding for? (choose all that apply)
- a. Training resources for Title IX coordinator
 - b. Training resources for faculty and staff
 - c. Training resources for students
 - d. Additional paid staff
 - e. Other _____

Demographic

Type of Institution

17. Please choose the option that best describes the **size** of your institution based on enrolled full-time, undergraduate students.
- a. Small (<2,000)
 - b. Medium (2,000-4,000)
 - c. Large (>4,000)
 - d. I prefer not to respond.
18. Please choose the option that best describes your institution based on **religious affiliation**.
- a. Religiously-affiliated.
 - b. Not religiously-affiliated.
 - c. I prefer not to respond.
19. Please choose the option that best describes your institution's **location** ([more information](#)).
- a. Rural
 - b. Suburban
 - c. Urban
 - d. I prefer not to respond.
20. Is your institution a minority-serving institution ([MSI](#))?

- a. Yes
- b. No
- c. I prefer not to respond.

Title IX Coordinator Background

21. Briefly describe the role you held prior to becoming the Title IX coordinator at your institution?
22. Do you hold institutional responsibilities beyond your role as a Title IX coordinator? (yes/no)
23. (If yes), Please briefly describe your other institutional responsibility/responsibilities.

Appendix D: Survey Response Legend for Quantitative Analysis

Independent Variables

Small (<2000) = 1
Medium (2000-4000) = 2
Large (>4000) = 3

Religiously-affiliated = 1
Not religiously affiliated = 0

Minority-serving yes = 1
Minority-serving no = 0

Rural = 1
Suburban = 2
Urban = 3

Dependent Variables

Excellent Understanding = 5
Moderate Understanding = 4
Little Understanding = 3
No Understanding = 2
I'm not sure = 1

No = 0
Yes = 1

I am an attorney = 1
We have an on-campus attorney = 2
We contract with an attorney office = 3

Training resources for Title IX Coordinator = 1
Training resources for faculty and staff = 2
Training resources for students = 3
Additional paid staff = 4
Other = 5

More in-person training = 1
Less in-person training = 2
More virtual training = 3
Less virtual training = 4
Other (briefly describe) = 5

Appendix E: Timeline of Key Title IX Amendments

