



Texas A&M University Title IX Compliance Report



Department of Atmospheric Sciences

Office of Diversity and Equal Opportunity

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I. INTRODUCTION

NASA conducted a compliance review of the Texas A&M University (Texas A&M or the University) Department of Atmospheric Sciences (ATMO, the Department, or the program), to ensure that beneficiaries of NASA grants have equal opportunity, without regard to sex, to pursue, participate in and benefit from academic research, career development opportunities, extracurricular and other educational activities. The review was conducted under Title IX of the Education Amendments of 1972, and NASA's implementing regulations and policy, which prohibit discrimination on the basis of sex in educational programs and activities receiving Federal financial assistance.¹

A. Background

NASA Title IX regulations provide for periodic review of NASA grant recipients.² These regulations became effective in November 2000. NASA's Title IX compliance program received further impetus with the July 2004 report of the Government Accountability Office (GAO), which recommended that Federal agencies conduct onsite compliance reviews.³ In addition, NASA's 2005 authorizing legislation requires the Agency to conduct at least two Title IX compliance reviews annually.⁴ NASA has been involved in many Title IX related compliance activities since the regulations were issued in 2000, conducting a number of limited-scope "desk-audit" as well as onsite reviews of grant recipients.

B. Objectives and Scope

NASA sought to achieve the following key objectives in conducting this review:

Objective 1

Evaluation of Texas A&M's compliance with NASA Title IX regulations, specifically to:

- Assess the Title IX Coordinator's role and functioning; confirm the existence of Title IX policy and procedures and the quality of their dissemination; evaluate Title IX grievance procedures and the effectiveness of their implementation; and review Title IX self-evaluation efforts, specifically regarding the Texas A&M program under review; and
- Evaluate the ATMO program's provision of equal opportunity regardless of gender in the following areas of program administration: student and faculty recruitment, outreach, admissions, enrollment, retention, academic advising, research participation, classroom and lab experiences, student experiences relating to parental/marital status ("family friendly" policies and practices), physical safety of the program environment.

¹ Title IX of the Education Amendments, as amended (20 U.S.C. §§ 1681-1688); Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, 14 C.F.R. Part 1253; NASA Policy Directive 2081.1A, Subject: Nondiscrimination in Federally Assisted and Federally Conducted Programs of NASA - Delegation of Authority.

² See 65 Fed. Reg. 52,859 (Aug. 30, 2000). Enforcement Procedures, 14 C.F.R. § 1253.605 (incorporating compliance requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d)).

³ Government Accountability Office, *Gender Issues: Women's Participation in the Sciences Has Increased, but Agencies Need to Do More to Ensure Compliance with Title IX* (July 2004) (July 2004 GAO Report). Included in the Report's recommendations was that "the Administrator of NASA continue to implement its compliance review program to ensure that compliance reviews of grantees are periodically conducted." (p. 28).

⁴ See NASA Authorization Act of 2005, 42 U.S.C. § 16798(b), reenacted as 51 USC § 40909 (2011). Note that NASA's most recent authorizing legislation does not include this provision; however, as the original provision had no sunset clause, we continue to seek to meet the 2005 requirement.

Objective 2

Identification of promising practices of Texas A&M University and the Atmospheric Sciences program designed to promote gender equity, specifically to:

- Describe efforts consistent with the recommendations and focus of the July 2004 GAO report; and to
- Determine the extent to which promising practices are actually helping to create greater gender equity and diversity in the program, for both students and faculty.

C. Methodology

1. Pre-onsite Review Activities

NASA developed a Title IX compliance review plan (CRP) to identify relevant regulatory requirements, potential issues and specific inquiries needed to conduct a thorough compliance assessment of its grantees. The CRP was developed in consultation with the U.S. Department of Justice (DOJ), Civil Rights Division, and the U.S. Department of Education (ED) Office for Civil Rights (OCR), the lead agencies on Title IX investigations. The CRP identified two focal points for compliance assessment: 1) Title IX procedural compliance requirements; and 2) program administration, that is, policies, procedures, and practices affecting the academic environment (see “Objectives,” above). The CRP also identified the methods by which needed information would be gathered from recipients, including: information requests for statistical data and relevant policies and procedures, and an on-site visit to interview university officials, program faculty, and students. In addition, NASA developed a Title IX literature review to better understand national concerns regarding gender in science, technology, engineering, and mathematics (STEM) fields as well as strategies recipients should undertake to address such concerns, including stronger Title IX compliance efforts in the STEM context. (See Appendix A: Title IX Summary Literature Review).

NASA, through its NASA Shared Services Center (NSSC), a professional survey administration organization, partnered with Texas A&M in deploying an online survey or Title IX Compliance Review Data Collection. The purposes of the survey were to: 1) gain a greater understanding of gender dynamics in the Texas A&M academic environment in support of the compliance review analysis and assessment; and 2) provide Texas A&M’s administration with an additional tool for assessing the gender dynamics of their academic environment, as part of their efforts to better ensure equal opportunities regardless of gender. Thus, focal points of the survey were program climate, gender discrimination/harassment, and campus safety, including sexual assault and sexual violence. NSSC deployed the survey via email to Texas A&M students during the period February 10 to February 28, 2014. The survey was sent to all Texas A&M ATMO students. The response rate was 34%, with 51 completed surveys and 12 incomplete surveys submitted. Key results of the survey are discussed in NASA’s Compliance Review Analysis (see Section II below). A complete report of the survey is also provided as Appendix B.

2. On-site Compliance Review Activities

The NASA compliance team conducted an on-site review of the Texas A&M ATMO Department on January 28-30, 2014. During its visit, the compliance team conducted one-on-one interviews with Dr. Kate C. Miller, Texas A&M’s Dean, College of Geosciences; Sarah Bednarz, Associate Dean, Academic Affairs; Dr. Doug Wells, Dean of Graduate Education;

Dr. Benedic, Dean of Faculties; Dr. Sonia Garcia, Director of Recruitment; Dr. Joni Baker, the A&M System Director for the Office of Equal Opportunity and Diversity, and Charley Clark, the Associate Vice President for University Risk and Compliance and Texas A&M College Station Campus Title IX Coordinator. The team also interviewed 14 ATMO faculty members (11 male and three female), as well as other faculty, including Dr. Sonia Garcia, Director of Recruitment and Dr. Sherry Yenello, ADVANCE program lead. NASA spoke with 17 ATMO students: 10 graduates (four female; six male) and seven undergraduates (four females, three males). In addition to the one-on-one interviews, NASA reached a larger number of ATMO students with our Title IX survey, the results of which are discussed in our compliance analysis below.

II. COMPLIANCE REVIEW ANALYSIS

The compliance review analysis provides an assessment of issues within the two focus areas of procedural compliance requirements and methods of program administration. Regulatory requirements and findings of fact are set forth as part of the compliance assessment under each main topic. The associated recommendations are intended to strengthen existing compliance activities. Promising practices associated with each of the compliance areas are also reported.

[Note: Where Texas A&M has informed NASA of its efforts to address a given recommendation prior to the issuance of the final compliance report, or where it has offered commentary on a recommendation, NASA has made the update or commentary a part of the final report (see Texas A&M “Updates”, below).]

A. Designation of Responsible Official for Title IX Coordination and Enforcement

I. Compliance Assessment

The NASA Title IX regulations state that a recipient must designate an official responsible for Title IX coordination and enforcement, i.e., a “Title IX Coordinator.”⁵ The recipient must notify all students and employees of the Title IX Coordinator’s name, office address, and telephone number.

a. Title IX Coordinator and Contact Information Dissemination

NASA’s compliance assessment focused first on the Title IX regulatory requirement to disseminate contact information for the Title IX coordinator(s). Dr. Joni Baker, the A&M System Director for Equal Opportunity and Diversity, oversees the Title IX compliance and outreach activities of the 13 universities and seven state agencies in the A&M System, in addition to other federal and state civil rights laws. The Title IX coordinator for the flagship campus at College Station (the subject of NASA’s review) is Charley Clark, Associate Vice President for University Risk and Compliance.

Regarding Title IX’s requirement to disseminate contact information, Texas A&M University has a Title IX web page that provides contact information for the Title IX Coordinator and the three Deputy Coordinators for Faculty, Students, and Staff, respectively. Consistent with OCR guidance on providing notice of nondiscrimination, this information is also provided as part of Texas A&M’s Notice of Nondiscrimination and Abuse, which is also accessible from the University Risk and Compliance webpage. A small but important point: the lead Title IX’s

⁵ Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(a).

Coordinator's telephone number, while provided in the Notice, does not appear on the webpage (see Recommendations for this section, below).

During onsite interviews, the compliance team sought to determine the extent to which ATMO students, faculty and staff were aware of the Title IX Coordinator, her office and the purpose of her office. The compliance team found that students and faculty interviewed were familiar with at least the offices, that is, EO and Diversity and University Risk and Compliance, if not the names of the Title IX Coordinators. This in and of itself is unusual, given that students and faculty on large campuses are rarely familiar with the institution's Title IX compliance officials. Texas A&M is to be commended for its efforts to ensure appropriate dissemination of Title IX compliance official contact information within the ATMO Department.

b. Effective Title IX Coordination: Oversight of the Grievance Process, Authority/Access to Senior Leadership, and Training Efforts

While the NASA Title IX regulations do not provide further specificity regarding the role and effective functioning of the Title IX Coordinator's role, the U.S. Department of Justice (DOJ), which has oversight responsibility for all Federal Title IX compliance and enforcement activities, has provided additional considerations for Federal agencies evaluating recipient compliance with the Title IX Coordinator regulatory provision.⁶ These additional considerations appear in DOJ's document, "Questions and Answers Regarding Title IX Procedural Requirements" (Title IX Q&A).⁷ In addition, effective Title IX coordination is one of a number of key Title IX requirements addressed in OCR's April 2014 guidance, "Questions and Answers on Title IX and Sexual Violence" (April 2014 Q&A).⁸ As its title indicates, this most recent guidance clarifies and expounds on Title IX requirements in the context of addressing sexual violence, but it contains valuable guidance for compliance with a host of Title IX requirements.

Title IX Coordination Compliance. In addition to the contact information dissemination requirement, for purposes of this review, NASA focused on the following key aspects of Title IX coordination:

- Effective functioning, including skills and competencies, regarding the administration and implementation of Texas A&M's Title IX grievance process;
- The authority and access of the Title IX Coordinator to university senior leadership needed to effectively perform roles and responsibilities; and
- Appropriate training of faculty, staff, and students.

The Texas A&M College Station Title IX Coordinator is responsible for all complaints of harassment or discrimination brought by employees, staff or students who make claims in the context of their employment or education. This includes investigation of such claims. Texas A&M's main campus has three Deputy Title IX Coordinators (one each from Student Affairs, Dean of Faculties, and Human Resources) who oversee complaints against students, faculty, and

⁶ See Executive Order 12250, 3 C.F.R., 1980 Comp. 298. Section I-203 of the Executive Order states that "[t]he Attorney General shall develop standards and procedures for taking enforcement actions and for conducting investigations and compliance reviews."

⁷ This document is accessible at <http://www.justice.gov/crt/about/cor/coord/TitleIXQandA.php>.

⁸ This document is accessible at <http://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf>.

staff and visitors, respectively.⁹ Consistent with OCR guidance, the lead coordinator has ultimate oversight responsibility.

The Deputy Title IX Coordinator for Student Affairs is formally the Assistant Vice President, Student Affairs. NASA notes in this regard that OCR's April 2014 Q&A states that employees whose job responsibilities may conflict with a Title IX coordinator's responsibilities include Directors of Athletics, Deans of Students, and any employee who serves on the judicial/hearing board or to whom an appeal might be made. Texas A&M informs NASA that none of the Deputy Coordinators have job responsibilities that conflict with their Title IX responsibilities. They do not serve on any judicial/hearing boards and are not in a chain of authority through which appeals may be made. Nonetheless, because the Deputy Title IX Coordinator handling student matters is in a reporting chain to the Dean of Students, NASA cautions Texas A&M on the need to give consideration to reducing the potential for conflict of interest or appearance of conflict of interest. However, it should be noted that, given the overall structure, we do not view this as a significant compliance issue.

Regarding other core aspects of effective functioning of Title IX coordination, including appropriate skills and competencies, OCR's April 2014 Q&A states that: "A Title IX coordinator's core responsibilities include overseeing the school's response to Title IX reports and complaints and identifying and addressing any patterns or systemic problems revealed by such reports and complaints. This means that the Title IX coordinator must have knowledge of the requirements of Title IX, of the school's own policies and procedures on sex discrimination, and of all complaints raising Title IX issues throughout the school."¹⁰

NASA conducted onsite interviews with the Texas A&M College Station Title IX Coordinator and Deputy Coordinators for Student Affairs and for Faculties. Texas A&M also provided extensive responsive information, including resumes and professional association membership, as well as recent Title IX and related training received by compliance officials. According to the University, those with Title IX coordination roles have participated in a wide range of training on Title IX provided by professional organizations such as the National Association of College and University Attorneys and the Association of Title IX Administrators. Based on Texas A&M's responsive information and our onsite interviews, NASA finds that these officials possess knowledge of the requirements of Title IX as called for in DOJ and OCR guidance. This includes knowledge of the school's own policies and procedures, and of complaints raising Title IX issues throughout the school. We note, however, that a key staffer of the Deputy Coordinator for Human Resources/Administration, the Director for Policy and Practices Review, whom the NASA team met with, is departing Texas A&M College Station to serve at another Texas A&M campus abroad. It is important that his replacement possess appropriate Title IX knowledge and skills (see Recommendations for this section, below).

Regarding access to top leadership, the Title IX Coordinator reports directly to the Vice President for Finance and Administration. However, the Title IX Coordinator informed NASA that he has direct access to the President and has for many years. He stated that he met with Texas A&M's Interim President on the day after the Interim President began his duties and that

⁹ Texas A&M also has Title IX Campus *Coordinators* for Texas A&M University at Galveston, Texas A&M University at Qatar, the Texas A&M Health Science Center, and the Texas A&M School of Law. These individuals represent Texas A&M University campuses on the Title IX Stakeholder Committee to enhance communications. There is also a compliance representative from athletics on the Title IX Stakeholder Committee.

¹⁰ OCR April 2014 Q&A, p. 10.

the move from direct reporting to reporting to the VP for Finance and Administration has done nothing to decrease his actual access to the President. Moreover, as the head of University Risk and Compliance, he has identified Title IX as a high-risk arena, designating it a “red” on scale of red, yellow and green. This is due in part to Texas A&M’s awareness of the issue of sexual violence on campus as a national concern right now, and one that every educational institution must do its part to address.

The compliance team also examined the training efforts that the campus’s Title IX Coordinator and Deputy Coordinators undertake on a regular basis, since training is a critical part of the tasks and responsibilities of Title IX coordination efforts.¹¹ The university reported that all Texas A&M employees (including graduate assistants, student workers, and postdocs) are required to complete approved training on employment discrimination and sexual harassment – “Creating a Discrimination-Free Workplace” - within 30 days of hire and biennially thereafter. All ATMO faculty, staff and students are current with the required training. Texas A&M also has a non-mandatory on-line training course entitled “Sexual Harassment: What Supervisors Need to Know.” A third on-line training course, entitled “Effective Hiring Practices,” addresses methods to avoid discrimination in hiring decisions. In addition, Texas A&M’s Office of Employee and Organizational Development, which works in collaboration with the university’s Title IX Coordinator and the various Deputy Coordinators, provides a wide array of diversity and EO related training throughout the year. Titles include “Fostering Respect in a Diverse Workplace,” “Sexual Harassment Prevention Strategies,” and “Preventing Workplace Violence – Identifying and Intervening with Concerning Behaviors,” among numerous others. NASA notes with approval that Texas A&M trains thousands of university employees annually. Training efforts appear well coordinated across the three separate arenas under which complaints can arise – faculty, students and staff. Also, as a result of the mandatory nature of the basic on-line training, all members of the campus community have been exposed to this critical information. However, we are concerned with the very low numbers for non-mandatory sexual harassment prevention courses, which presumably provide a more in-depth, advanced, or specialized exploration of the issues, for example, the supervisor’s role or specific prevention strategies. Here, according to the university’s response to NASA’s information request, participations rates are generally in the single digits or zero for faculty and students in recent years (see Recommendations, below).

2. Recommendations

a. Title IX Coordinator: Contact Information Compliance. Texas A&M should provide the telephone number of the lead Title IX Coordinator for the College Station Campus on the University’s Risk and Compliance Title IX page, along with his email address, and the telephone numbers and email addresses of the Deputy Coordinators.

Texas A&M Update: This has been implemented. See <http://titleix.tamu.edu>.

b. Expanded Communications Efforts as Needed. To the extent that it has not already done so, Texas A&M should replicate its ATMO Title IX information dissemination campaign across its numerous campuses. The University may also wish to consider forwarding an email to all students at

¹¹ See Title IX Q&A, “Designation of Title IX Coordinator – What factors should a recipient consider in designating a Title IX Coordinator?”

the beginning of each academic year or semester communicating the Title IX Coordinator's contact information and role. In addition, the University should communicate general information about reporting and the process employed by the HR office to address such matters (to the extent that it does not already do so in the case of the latter). Additionally, the University may wish to consider the use of social media, such as Facebook and Twitter, texting, optimization for hand-held devices, or other non-traditional methods to fully disseminate the Title IX Coordinators' contact information and roles among faculty, staff, and students.

Texas A&M Update: Texas A&M is expanding its Title IX information dissemination campaign. Following are some examples.

- The Title IX Coordinator disseminated Texas A&M's Notice of Nondiscrimination and Abuse biannually during fiscal year 2013-2014 to all enrolled students, faculty and staff on the main campus. The Texas A&M notice includes general information and was shared with branch campuses and other locations so that it could be tailored for campus specific contact information and resources and distributed to their campus community. An updated notice is planned for early fall of fiscal year 2014-2015 that will incorporate a link to the Texas A&M Title IX Website for additional information.
- A video to provide prevention and awareness information has been developed at the system level for all system members. This video can be accessed through Texas A&M's Title IX website, and information about its availability will be disseminated in various ways.
- The Dean of Student Life distributes an email to students annually related to Title IX. The email sent in September 2014 includes information on dating violence, domestic violence, and stalking.
- As part of Student Affairs' "You Are Not Alone: Raising Awareness and Reducing Sexual Assault in Aggieland" marketing campaign, an infographic image was emailed to all students addressing national and campus statistics, reporting information, bystander interventions, reporting options, and resources. Posters containing the image will also be distributed across campus. Student Affairs has shared informational materials with other Texas A&M locations.
- In addition to the notice of non-discrimination, the Dean of Faculties provides additional information on Title IX to all faculty by email at the beginning of each semester. Fliers are included in folders provided to faculty and department heads during 'New Faculty' and 'New Academic Leaders' orientations. Orientations also include a short presentation by the Dean of Faculties and the Dean of Student Life providing information about Title IX.
- Human Resources added victim resources and contact information to the instructor-led classroom training for Fostering Respect in a Diverse Workplace, Preventing Sexual Harassment-Employee Overview, and Preventing Sexual Harassment Supervisory Overview. HR also has developed a resource document that will be made available in the above mentioned training, the HR website, and in New Employee Orientation/onboarding efforts.
- ATMO - The Assistant Dean for Graduate Affairs and Diversity will craft and distribute a college-wide email at the beginning of each academic year, starting Fall 2014, addressing all compliance, policy and procedural issues relevant to Title IX within Texas A&M Geosciences. The e-mail will include an overview of College philosophy and policy, with relevant links to all University-wide policy, procedure and reporting resources.
- Texas A&M will continue to expand its Title IX outreach, and communication campaigns and will explore using social media and other nontraditional methods in its future marketing campaign. For example, the Title IX Coordinator is exploring opportunities with the University's Marketing and Communications Department to enhance Title IX visibility.

c. New Deputy Title IX Coordinator. Texas A&M should inform NASA of the name and contact information of its new coordinator.

Texas A&M Update: Ms. Janelle Ramirez, Interim Associate Vice President for Human Resources and Administration Services, has been serving as the current Deputy Title IX Coordinator for Human Resources since January 2014.

d. Enhancing Training Efforts to Increase Voluntary Training Participation. While Texas A&M provides mandatory training on maintaining a harassment and discrimination free environment, the University should undertake additional efforts to increase participation rates in its voluntary sexual harassment and diversity and inclusion training courses, especially among its faculty and graduate assistant population, where participation rates appear to be unusually low. Emphasis should be placed on targeted training in this area, for example, ensuring that faculty and staff with supervisory roles participate in the voluntary training offered on the supervisor’s role in sexual harassment prevention. It is also important to hear from faculty, staff, and students in ATMO and other STEM programs about their needs for training, that is, what they believe is important to hear about, based on their own concerns and experiences. In this regard, NASA recommends that the Title IX Coordinators conduct focus groups with ATMO and other STEM faculty, staff and students, to better understand their training needs. In addition, the results of the NASA Title IX Survey, attached as Appendix A and discussed in more detail in Section II.E., below, should be closely analyzed to assess areas of training need. Finally, Texas A&M may wish to consider Toolsforchangeinstem.org, designed specifically to assist Title IX compliance officials in the STEM context.

Texas A&M Update:

- The A&M system online training course entitled: Sexual Harassment, What Supervisors Need to Know, has not been updated in several years. In view of recent federal guidance on sexual harassment and sexual violence, the system intends a comprehensive review and updating of this training course before promoting it widely across the system, including at Texas A&M.
- Texas A&M’s Title IX Coordinator and Deputy Coordinators will continue to collaboratively engage campus-wide stakeholders, e.g., ATMO and other STEM departments, the Office of Graduate and Professional Studies, ADVANCE, the Women’s Resource Center, and Employee and Organizational Development. The stakeholders will identify and assess available training, provide feedback, and analyze relevant surveys to determine training needs, target training initiatives, and encourage attendance, including faculty and graduate students.

3. Promising Practice

Well-Articulated Organizational Scheme Underpinning Title IX Efforts. Texas A&M employs a Director, Office of Equal Opportunity and Diversity (OEOD) at the A&M System level whose role is to coordinate the Title IX efforts of the University’s multi-campus structure. Essentially, the Director, OEOD, oversees the work of the Title IX Coordinator and Deputy Title IX Coordinators at each campus, a “Coordinator of Coordinators,” so to speak. As such, the Director, OEOD has responsibility for ensuring each campus is performing its Title IX responsibilities optimally. This pyramid structure enables Texas A&M to ensure uniformity and quality control in Title IX compliance efforts across its multi-campus structure, and to better facilitate cross-pollination of best practices. NASA found that with a well-articulated organizational structure underpinning its Title efforts, Texas A&M is exceptionally efficient and generally proactive in meeting its Title IX obligations. From a practical standpoint, Texas A&M greatly increases the likelihood that students will be aware of the University’s Title IX Coordinators because the role is not limited to a single individual.

B. Adoption of Grievance Procedures and Policy Dissemination

1. Compliance Assessment

The NASA Title IX regulations require that recipient educational institutions adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee

complaints alleging any action that would be prohibited by Title IX.¹² NASA's Title IX regulations also require grant recipients to take specific and continuing steps to notify students, employees, applicants for admission and employment, and unions or professional organizations having collective bargaining or professional agreements with the recipient, that the recipient does not discriminate based on gender in the educational programs or activities that it operates, and that it is required by Title IX not to discriminate in such a manner.¹³

a. Grievance Procedures

NASA's compliance assessment seeks to ensure that Texas A&M has developed and is implementing procedures that afford a grievant "prompt and equitable" resolution of student and employee complaints alleging any action that would be prohibited by the Title IX regulations.¹⁴ As the regulations do not provide any further specificity regarding the procedures, NASA looked to key guidance documents from DOJ and ED OCR.¹⁵ These guidance documents provide additional considerations on the basic components of effective, i.e., prompt and equitable, grievance procedures in the discrimination and harassment contexts.¹⁶

Grievance Procedures Compliance. In evaluating whether a school's grievance procedures are prompt and equitable, and thus satisfy the Title IX requirement, NASA looks to applicable DOJ and OCR guidance to determine whether the procedures provide for:

1. Notice of the right to file a discrimination complaint with an appropriate Federal agency, either simultaneously with the filing of an internal grievance or after the unsatisfactory resolution of a grievance.¹⁷
2. Notice to students, parents of elementary and secondary students, and employees of the procedure, including where complaints may be filed;
3. Application of the procedure to complaints alleging harassment carried out by employees, other students, or third parties;
4. Provisions for adequate, reliable, and impartial investigation of complaints, including the opportunity to present witnesses and other evidence;
5. Designated and reasonably prompt timeframes for the major stages of the complaint process;
6. Written notice to the complainant and alleged perpetrator of the outcome of the complaint;¹⁸
7. An assurance that the school will take steps to prevent recurrence of any harassment and to correct its discriminatory effects on the complainant and others, if appropriate;¹⁹
8. Where appeals are part of procedures, they must be accorded equally between the parties;²⁰
9. Appropriate dissemination, including efforts to ensure ease of access and understanding.²¹

¹² Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(b).

¹³ Dissemination of policy, 14 C.F.R. § 1253.140.

¹⁴ 14 C.F.R. § 1253.135(b).

¹⁵ These include the following: 1) DOJ Title IX Q&A and OCR's 2) Revised Sexual Harassment Guidance, 3) April 2011 "Dear Colleague" letter (DCL) on sexual violence, and 4) April 2014 Q&A.

¹⁶ The DOJ Title IX Q&A states that recipient grievance procedures are a mechanism used to determine whether a particular act, policy, or practice of a recipient complies with Title IX regulations. See DOJ, Title IX Q&A, "Grievance Procedures."

¹⁷ DOJ, Title IX Q&A, "Grievance Procedures."

¹⁸ April 2014 Q&A, p. 12.

¹⁹ See OCR Revised Sexual Harassment Guidance, § IX. Prompt and Equitable Grievance Procedures (citations omitted); see also, April 2014 Q&A, p. 12.

²⁰ April 2011 DCL, p. 12.

²¹ Importantly, OCR states that "[a] grievance procedure . . . cannot be prompt or equitable unless students know it exists, how it works, and how to file a complaint. Thus, the procedures should be written in language appropriate to

NASA also looks to the following, regarding which OCR has stated “a school’s Title IX grievance procedures should also explicitly include in writing:”²²

1. A statement of the school’s jurisdiction over Title IX complaints;
2. Adequate definitions of sexual harassment (which includes sexual violence) and an explanation as to when such conduct creates a hostile environment;
3. Reporting policies and protocols, including provisions for confidential reporting;
4. Identification of the employee or employees responsible for evaluating requests for confidentiality;
5. Notice that Title IX prohibits retaliation;
6. Notice of a student’s right to file a criminal complaint and a Title IX complaint simultaneously;
7. Notice of available interim measures that may be taken to protect the student in the educational setting;
8. The evidentiary standard that must be used (preponderance of the evidence) (*i.e.*, more likely than not that sexual violence occurred) in resolving a complaint;²³
9. Notice of potential remedies for students;
10. Notice of potential sanctions against perpetrators; and
11. Sources of counseling, advocacy, and support.

Regarding the above considerations, NASA has concerns with Texas A&M’s procedures insofar as: 1) ease of access and understanding, 2) explicit reference to use of the preponderance of the evidence standard, 3) right to file directly with a federal agency, 4) right to file a criminal complaint, and 5) notice of available interim measures that may be taken to protect the student in the educational setting. These are discussed in more detail below. As a general matter, the university should consult all of the cited DOJ and OCR guidance documents closely in ensuring that its procedures comply with Title IX requirements (see Recommendations, below).

(i) Ease of Access and Understanding

Texas A&M’s procedures for receiving and processing civil rights complaints are embodied in a number of different documents based on the role of the individual against whom the complaint is being raised, that is, whether the individual is a faculty member, a staff member or a student. A basic university rule on civil rights compliance designates the appropriate contacts for each scenario and has embedded links to the various procedures to be used.²⁴ Notwithstanding that

the age of the school’s students, easily understood, and widely disseminated.” Revised Sexual Harassment Guidance, § IX. Prompt and Equitable Grievance Procedures.

²² April 2014 Q&A, p. 13.

²³ April 2011 DCL, p. 11, stating: “[I]n order for a school’s grievance procedures to be consistent with Title IX standards, the school must use a preponderance of the evidence standard (*i.e.*, it is more likely than not that sexual harassment or violence occurred). The “clear and convincing” standard (*i.e.*, it is highly probable or reasonably certain that the sexual harassment or violence occurred), currently used by some schools, is a higher standard of proof. Grievance procedures that use this higher standard are inconsistent with the standard of proof established for violations of the civil rights laws, and are thus not equitable under Title IX. Therefore, preponderance of the evidence is the appropriate standard for investigating allegations of sexual harassment or violence.” April 2011 Dear Colleague letter, § Prompt and Equitable Requirements, (B) Adequate, Reliable, and Impartial Investigation of Complaints; see also April 2014, Q&A, p. 13.

²⁴ University rule 08.01.01.M1, Civil Rights Compliance, <http://rules-saps.tamu.edu/PDFs/08.01.01.M1.pdf>, approved Feb. 29, 2012.

the simplest and most accessible complaint procedures would be “all in one,” NASA recognizes the logic behind separate sets of procedures, for example, one for faculty respondents and one for students, as a means of handling discrimination and harassment complaints. We recognize too that all-in-one procedures may not be feasible, given the differing set of rules and regulations controlling for faculty behavior versus students’.

However, even allowing for the need for separate sets of procedures depending on whom the complaint is being brought against, Texas A&M has an unusually complex set of separate rules and regulations, each describing aspects of the process but not the process in its entirety. For example, the regulation (08.01.01) explains the roles and responsibilities of various actors in the process, e.g., Director, Equal Opportunity and Diversity, the University rule (08.01.01.M1) explains to which offices individuals should go to raise complaints, and the standard administrative procedure for complaints against faculty (08.01.01.M1.02) provides the process for investigation and resolution of such complaints, but it does not include key information such as definition of terms and procedures for appeal. OCR guidance is clear that recipients’ grievance procedures do not meet the “prompt and equitable” regulatory standard “unless students know [the procedure] exists, how it works, and how to file a complaint. Thus, the procedures should be . . . easily understood, and widely disseminated.” While the various Texas A&M policy and procedural documents follow a logical progression, from regulatory statement, to rule, to sets of procedures for complaints against faculty, staff or students, the documents cannot be said to be “easily understood.” This is due in part due to the diffuseness of the information, conveyed in numerous separate documents. It is also because there does not seem to be a simple recitation of the basic policy and process, including definitions, designated officials for reporting, process elements and timeframes. *At a minimum, Texas A&M should provide comprehensive policy and procedural information in easy-to-understand and easily accessible format (see Recommendations, below).*

(ii) Other Compliance Concerns

Texas A&M complaint procedures also do not conform to compliance requirements in several other important respects, mentioned above, including: 1) they do not expressly state that a preponderance of the evidence is the standard of proof used in Title IX cases; and 2) they do not expressly notify faculty, students, and staff of the right to file a complaint directly with OCR or another federal funding agency, e.g., NASA, and have it processed at the federal level. As OCR guidance advises explicit reference in the procedures, these issues must be addressed promptly (see Recommendations, below).

A final note on Texas A&M’s Title IX grievance procedures: In terms of actual complaints filed in the ATMO Department for the period of this review, Texas A&M reports that there were no sex discrimination or sexual harassment grievances or formal complaints against faculty, staff, and/or students by undergraduate or graduate ATMO majors in the period from academic year 2008-09 to the present, the period of NASA’s review. Lack of complaints does not necessarily translate into lack of concerns among students. Nonetheless, NASA’s observations of the ATMO program environment, based on our onsite review, and analysis of student responses to our Title IX survey, do not suggest the presence of concerns that are not being addressed.

b. Policy Dissemination

Relevant ED OCR and DOJ guidance also informed NASA's assessment of Texas A&M compliance with the regulatory provision requiring dissemination of Title IX policy and procedures.²⁵

Policy Dissemination Compliance. OCR's guidance emphasizes the need for recipient institutions to have "well-publicized" grievance procedures.²⁶ In addition, OCR states, "without a disseminated [sexual harassment] policy and procedure, a student does not know either of the school's policy against and obligation to address this form of discrimination, or how to report harassment so that it can be remedied."²⁷ Importantly, OCR stated in its Revised Sexual Harassment Guidance (2001):

Distributing the procedures to administrators, or including them in the school's administrative or policy manual, *may not by itself be an effective way of providing notice, as these publications are usually not widely circulated to and understood by all members of the school community.* Many schools ensure adequate notice to students by having copies of the procedures available at various locations throughout the school or campus; publishing the procedures as a separate document; including a summary of the procedures in major publications issued by the school, such as handbooks and catalogs for students, parents of elementary and secondary students, faculty, and staff; and identifying individuals who can explain how the procedures work.²⁸

More recently, in its April 2011 Dear Colleague letter on Title IX and sexual violence, OCR has advised grant recipients that their "grievance procedures be prominently posted on school Web sites; sent electronically to all members of the school community; available at various locations throughout the school or campus; and summarized in or attached to major publications issued by the school, such as handbooks, codes of conduct, and catalogs for students, parents of elementary and secondary students, faculty, and staff."²⁹ DOJ regulations also make Federal funding agencies and recipient institutions responsible for disseminating information materials, e.g., handbooks, manuals, pamphlets, to ensure program beneficiaries are aware of their rights pursuant to EO law.³⁰

The Texas A&M Title IX Coordinator reports that Title IX related policies and procedures are disseminated via multiple means, including print and online. In addition to providing contact information for the Title IX Coordinator and Deputy Coordinators, the University's Title IX website, mentioned above, contains links to the different sets of complaint procedures applicable based on who the complaint was filed against, e.g., student, faculty member. As the Texas A&M Title IX Coordinator is formally the Associate Vice President for University Risk and Compliance, the Title IX webpage is located within the Compliance section of the site. This is logical, although someone looking for information on, say sexual harassment, would first have to know that this relates to "compliance" with the law, specifically, Title IX.

²⁵ See, e.g., U.S. Department of Justice Civil Rights Division, *Title IX Legal Manual* (Jan. 11, 2001), § V.E., p. 111 (accessible at <http://www.usdoj.gov/crt/cor/coord/ixlegal.htm>); OCR Revised Sexual Harassment Guidance.

²⁶ See OCR Revised Sexual Harassment Guidance, Preamble, "Enduring Principles from the 1997 Guidance."

²⁷ *Ibid.*, § V(D), "The Role of Grievance Procedures."

²⁸ *Ibid.*, § IX. Prompt and Equitable Grievance Procedures (emphasis added).

²⁹ April 2011 Dear Colleague letter, § Prompt and Equitable Requirements, (A) Notice of the grievance procedures.

³⁰ Public dissemination of Title VI information, 28 C.F.R. § 42.405(c).

A Google search for the term “sexual harassment” within the Texas A&M website first takes one to the Student Code on Sexual Harassment. Many other pages come up before one comes across the detailed information on Title IX coordination and procedures provided on the Title IX and Texas A&M page at <https://urc.tamu.edu/compliance/SitePages/Title%20IX.aspx>. A similar result obtains with an intra website search for the term “sex discrimination.” While NASA finds that Texas A&M offers an accessible means of providing notice to the academic community, we also advise further consideration on making Title IX policies and procedures more readily accessible to someone not familiar with technical terms such as “compliance” or “Title IX” itself, but instead looking for “sexual harassment” or “sex discrimination” (see Recommendations section, below).

In addition to its Title IX website, Texas A&M is engaging in other means of Title IX information dissemination. For example, the University is doing an outstanding job of communicating information about the existence of Title IX as a tool to address sex discrimination and sexual harassment (see Promising Practices, below). To the extent that it is not already doing so, Texas A&M should make sure this messaging is reaching the entire College Station campus, as well as branch campuses and other Texas A&M locations.” (see Recommendations section below).

2. Recommendations

a. Grievance Procedures Compliance. To ensure compliance with relevant OCR and DOJ Title IX guidance, Texas A&M should:

- i. Review all relevant guidance, e.g., OCR’s April 2011 DCL, April 2014 Q&A, to carefully and thoroughly assess and ensure compliance with the requirement to provide for prompt and equitable resolution of student and employee complaints of sex discrimination, including sexual harassment and sexual violence.
- ii. Regarding those elements to be expressly provided in the procedures (see the April 2014 Q&A, p. 13), Texas A&M should immediately revise its procedures to conform with OCR guidance.

Texas A&M Update: Texas A&M appreciates NASA’s reference to OCR’s April 2014 Questions and Answers, although it notes that this guidance document was not available at the time of the University’s NASA’s Title IX compliance review. However, in order to comply with the new guidance, reviews and updates of system regulations and Texas A&M’s rules and standard administrative procedures are in progress. Student Rules have already been updated to contain items listed on the April 2014 Q&A. Currently, the preponderance of the evidence standard is specified in Student Rule 26, “Student Conduct Proceedings”(http://student-rules.tamu.edu/rule26).

b. Policy Dissemination.

- i. Texas A&M should look to search engine optimization (SEO) or other means that might help make it easier for someone looking for terms such as “sexual harassment” or “discrimination” to find out about the university’s policies and procedures for addressing these matters.

Texas A&M Update: Texas A&M’s Notice of Nondiscrimination references Title IX related policies, regulations, rules, procedures, and student rules. The notice can be directly accessed from the Texas A&M homepage under “Equal Opportunity”. Also, the notice is the third item listed when a Google search is performed using “sexual harassment” and the second item using the search phrase “sexual discrimination.” To optimize easy access to important Title IX information, Texas A&M has expanded its existing search engine metadata tags. Texas A&M is also considering changing its homepage identifying link for Equal Opportunity to “Equal Opportunity/Title IX” to enhance Title IX visibility.

ii. Texas A&M University should further refine its “Report It” page at <https://urc.tamu.edu/compliance/SitePages/Title%20IX%20FAQ.aspx> to provide a single statement of its procedures that is easily accessible and written in easy-to-understand, plain English but also comprehensive as to compliance guidelines. Both the “Report It” page, written in a Q&A format, or the university’s Notice of Nondiscrimination and Abuse page, or both, may be refined to provide the additional information needed, that is, clear but concise information on the actual process, including specific timeframes for process elements, as well as simple but direct statements addressing all of the considerations stated in OCR’s April 2014 Q&A (pp. 12-13).

Texas A&M Update: Texas A&M’s Title IX “Report It” page will be expanded to clarify processes, and a link will be added on the Notice of Non-discrimination to the Title IX Website and its “Report It” page.

iii. Texas A&M may wish to employ a “Feedback” or “Tell Us What You Think” tab about its Title IX pages, to learn whether visitors found the site easy to find, easy to understand, and easy to use.

Texas A&M Update: Texas A&M expanded its statement on the Title IX website page to state: “Tell us what you think. If you have questions or would like to provide feedback, please contact us at TitleIX.Coordinator@tamu.edu.”

3. Promising Practices

Information Dissemination. Texas A&M is doing an excellent job of communicating information on Title IX within the ATMO program environment. At the time of NASA’s visit, “Know Your Title IX” posters were everywhere in the ATMO Department program environment, from message boards to stall doors in both the men’s and women’s rest rooms. The ubiquitous nature of this messaging shows a strong effort on the part of the University, particularly its Title IX compliance officials, to “get the word out” and NASA commends the university for its actions in this regard. Such efforts can truly help those protected by the law to learn more about the rights it affords, and use that information should the need arise.

C. Self-Evaluation

1. Compliance Assessment

The NASA Title IX regulations required recipient institutions to conduct a Title IX Self-Evaluation regarding admissions and treatment of students by September 29, 2001, and to keep the Self-Evaluation on file for three years.³¹ While Texas A&M is not obligated to conduct a further Title IX Self-Evaluation, such evaluations are very helpful to ensure, for example, that selection criteria and academic practices do not adversely impact students on the basis of gender. They also provide an opportunity to evaluate trends over time and to develop mechanisms for proactively addressing emerging issues. Texas A&M’s response to the NASA information data request under the instant review constitutes a solid beginning to a Title IX self-evaluation in the key area of admissions and enrollments of students.³²

³¹ Self-evaluation, 14 C.F.R. § 1253.110(c).

³² 14 C.F.R. § 1253.110(c).

Texas A&M informed NASA that a draft self-evaluation has been developed and is undergoing review at various levels of the university. This draft self-evaluation, “Title IX Self-Evaluation Report-Phase I” (Phase I)³³ was conducted by the College Station Title IX Coordinator’s office, the Office of Risk and Compliance. Phase I focuses on Texas A&M’s policies, procedures and practices, and speaks to Title IX compliance in general terms although not with reference to specific requirements (see Recommendation, below). According to the College Station Title IX Coordinator, Title IX is a high priority for the University. The Phase I report cited several efforts in furtherance of this priority, including the establishment of Texas A&M’s ADVANCE Center, which uses National Science Foundation ADVANCE grants to improve the representation of women faculty in STEM fields. The report also details several “opportunities for improvement,” including the planned expansion of NASA’s analysis to other departments and colleges across campus as well as the need for analyses of underrepresentation of female students and faculty in the ATMO Department. (Note: These statistics are analyzed in Section D, below.)

2. Recommendation

Finalization of Institution-wide Title IX Self-Evaluation. Texas A&M University should finalize and implement all phases of its institution-wide Title IX Self-Evaluation. The self-evaluation should focus on the extent to which Texas A&M’s policies, procedures and practices comport with Title IX compliance requirements, specifically with regard to three broad areas: admission of students, treatment of students, and employment of both academic and non-academic personnel.³⁴ Within each area, the evaluation should focus on specific components of that area as reflected in the Title IX regulations. For example, with regard to student treatment, there should be analysis and compliance assessment on such components as access to course offerings, appraisal and counseling materials, housing, financial assistance (including employment assistance), health and insurance benefits and services, marital and parental status, among other components of student treatment.³⁵ See NASA, “A Guide for Conducting Title IX Self-Evaluations in STEM.”³⁶

Texas A&M Update: University Risk and Compliance performed an initial Title IX self-evaluation to obtain baseline information. The report indicates that Texas A&M has institutional policies, procedures, and practices to support Title IX compliance, and it provides direction to further strengthen compliance. The Title IX self-evaluation did not include the April 2014 Department of Education “Questions and Answers” since much of the evaluation work was completed prior to April 2014. Texas A&M will continue to evaluate the Q&As and made modifications as needed. The self-evaluation action plan addresses future collaborative efforts, coordinated through the Title IX Coordinator and Deputy Coordinators, to expand self-evaluation processes across the University, focusing on STEM and other areas of high interest. NASA’s tools and survey, which address the admission of students, the treatment of students, and the employment of both academic and non-academic personnel, will be made available to Texas A&M colleges and departments as part of the expanded self-evaluation process. Self-evaluation is an on-going process to identify trends over time and make modifications as appropriate.

³³ In Phase I, Texas A&M states that “Due to Title IX’s broad span of coverage and complexity, the self-evaluation process will be conducted in phases.”

³⁴ 14 C.F.R. §1253.110(c)(1).

³⁵ 14 C.F.R. §§ 1253.400-455.

³⁶ The Guide was published and disseminated to NASA grant recipients in June 2012. It will also be posted on the NASA Web site at: <http://odeo.hq.nasa.gov/>.

3. Promising Practice

Self-Evaluation Efforts to Date. Texas A&M's Title IX self-evaluation efforts, including its Phase I Report and the data collected in NASA's Title IX survey, as well as the statistical data on the Atmospheric Sciences program gathered for NASA by Texas A&M and analyzed below, provide an excellent start to Texas A&M's Title IX self-evaluation efforts in the academic context.

D. Recruitment, Admissions, Enrollment, Degrees Earned, and Faculty Recruitment³⁷

I. Compliance Assessment

The NASA Title IX regulations state that recipients may not discriminate on the basis of sex in admissions and recruitment.³⁸ Consistent with this requirement, NASA reviewed the Atmospheric Sciences Department's student recruitment and admissions practices, as well as data on student departures and degrees earned. For graduate students, NASA also examined financial assistance awarded to students and success on the comprehensive and qualifying exams. The review was based on five academic years: 2008-09 through 2012-13.

a. Outreach and Recruitment

With respect to graduate recruitment NASA found that the ATMO Department and the College of Geosciences actively recruit prospective graduate students. Some recruitment is done informally at geosciences conferences, symposiums and colloquia. However, most of the recruitment is targeted toward admitted applicants who have not yet made a decision to attend the University. Faculty and students informed NASA that the key recruitment activity is to invite admitted students to spend a weekend at Texas A&M, giving the College and the Department an opportunity to meet with perspective students. In 2011, the University created a new position within the College for the recruitment and retention of underserved graduate students: the Assistant Dean for Diversity and Graduate Student Recruitment and Development (the Assistant Dean), currently held by Dr. Eric Riggs.

With respect to undergraduate students, NASA found that a more programmatic approach is deployed to spark the interest of high school students in attending the University in the geosciences, particularly minority, female and first-generation students. To that end, the College has a Director of Undergraduate Recruitment and Retention, a position that according to the current Director was created in the last decade. The current Director, Dr. Sonia Garcia, has held the position since 2008. According to her bio on the College's website, the role of the Director is to "(lead) the effort in recruiting and retaining women, minority, and first-generation students, a segment largely underrepresented in the geosciences."³⁹ NASA found that this programmatic approach includes a number of events and programs throughout the year to expose potential recruits to the University and the College, such as [Aggieland Saturday](#) (a campus-wide open house for prospective high school and transfer students and their parents to explore the university), [IGeo](#) (a three day program in the fall to introduce under-represented

³⁷ All data in this section pertaining to Texas A&M students was provided by the University in response to NASA's information request.

³⁸ Admission, 14 C.F.R. §1225.300; Recruitment § 1253.310.

³⁹ College's iGeo website.

high school juniors and seniors to the geosciences, where on average, 62 percent of the participants in this program are women),⁴⁰ and [GeoX](#) (a week-long summer event that introduces high school juniors and seniors to geosciences where on average, 66 percent of the participants in this program are women).⁴¹ The Director stated that iGeo and GeoX were started in 2010, and are supported in part by corporate sponsorship.⁴² In addition, the Department's Web site includes pictures of gender diversity, showing both male and female faculty and students, and several pages highlighting the work of faculty and students.

b. Graduate Admissions

(i) Admissions Process

Graduate student recruitment is highly competitive in the Atmospheric Sciences. Thus, Texas A&M's recruitment and admission process is designed to maximize the number of both applicants and students who accept offers. Activities to maximize the number of applicants to the graduate program include the following:

- The main recruiting event is the annual meeting of the American Meteorological Society. ATMO has a booth during the entire meeting with graduate students or a professor present throughout the event. Students showing genuine interest in the University also are invited to the banquet given by the Department at the meeting.
- ATMO sends a poster with information about its program to the directors of undergraduate programs nationwide in which it expects to find potential applicants to its graduate program. The mailing list includes several hundred programs in meteorology, physics, applied mathematics, and engineering.
- Faculty members visiting other universities (e.g., to give an invited talk) are encouraged to meet with undergraduate students at the host universities. Faculty members also are encouraged to visit traditionally minority-serving colleges to recruit students.

The Department admits applicants to its graduate program only if it can provide full financial support (stipend, tuition remission, and fees) to them. Most students are supported by external grants as Research Assistants. Thus, faculty members who are Principle Investigators (PIs) on research projects play a key role in the selection of students for admission. When the Graduate Committee meets to review the applications, the packages of those students who were nominated for admission by the PIs who can offer research assistantships on their research projects are reviewed first. The review is based on the full application package, which includes a student essay, reference letters, transcripts, and GRE scores. The main goal of the committee is to determine whether the applicant has a realistic chance to be a successful graduate student in the program. Decisions are made by a simple majority vote. The Graduate Committee also identifies the strongest applicants not nominated for Research Assistantships and identifies potential faculty advisors for these students. If an advisor shows interest in an applicant, but does not expect to have external funding to support the student in the first year, the Committee considers offering a Teaching Assistant position to the student. Decisions on these positions also are made by a simple majority vote of the Committee. Once the admission decisions are made, offer letters are sent out to the selected applicants inviting those residing in the United States to visit the department. ATMO covers the travel expenses of all students who accept the invitation. Prospective students have one-on-one meetings with faculty members and

⁴⁰ University response to Information Request I.A.I. d. (recruitment)

⁴¹ Ibid.

⁴² iGeo is sponsored by Marathon Oil, while GeoX is sponsored by British Petroleum (BP).

several activities with graduate students. The female prospective students also meet as a group with each female member of the faculty. Students who accept the invitation to visit and show a genuine interest in joining the program are considered for supplemental scholarships from the Office of Graduate Studies, which are used to enhance the diversity of the student population.⁴³ Once a student accepts the department's offer, he/she is officially admitted to the program.

(ii) Graduate Admissions, Enrollment, Departures and Financial Aid

With regard to graduate student enrollment, between 2008 and 2013), women accounted for 26 percent of all graduate students in ATMO – slightly less than female participation nationwide.⁴⁴ (See Table I.) Female representation in ATMO is higher than in other University programs, such as Aerospace Engineering and Physics, though lower than in others, such as Geography, Oceanography, and Chemical Engineering. For example, in 2012, women represented roughly 50 percent or more of the Master's students in Geography, Oceanography, and Chemical Engineering, but were 5 percent or less of the Master's students in Aerospace Engineering and Physics. Comparatively, in 2012, 19 percent of Ph.D. students in the University's engineering programs and 43 percent of Ph.D. students in the Geosciences were women. As overall enrollment in the Department's Master's degree program increased from 19 to 24 students between 2008 and 2012, women also increased their presence from 16 percent to 29 percent of Master's degree students. The percentage of female Ph.D. students remained relatively constant over the 5-year period. On average, males have accounted for almost three-quarters of graduate students enrolled in the Department. (See Table I).

Table I. Graduate Student Enrollment, by Sex and Year

Academic Year	Master's Degree Students				Ph.D. Students				All Graduate Students			
	Female		Male		Female		Male		Female		Male	
	Number	Percent	No.	%	No.	%	No.	%	No.	%	No.	%
2008-09	3	16%	16	84%	9	27%	24	73%	12	23%	40	77%
2009-10	5	26%	14	74%	10	29%	25	71%	15	28%	39	72%
2010-11	8	31%	18	69%	8	25%	24	75%	16	28%	42	72%
2011-12	6	27%	16	73%	8	22%	28	78%	14	24%	44	76%
2012-13	7	29%	17	71%	9	26%	26	74%	16	27%	43	73%
Total	29	26%	81	74%	44	26%	127	74%	73	26%	208	74%

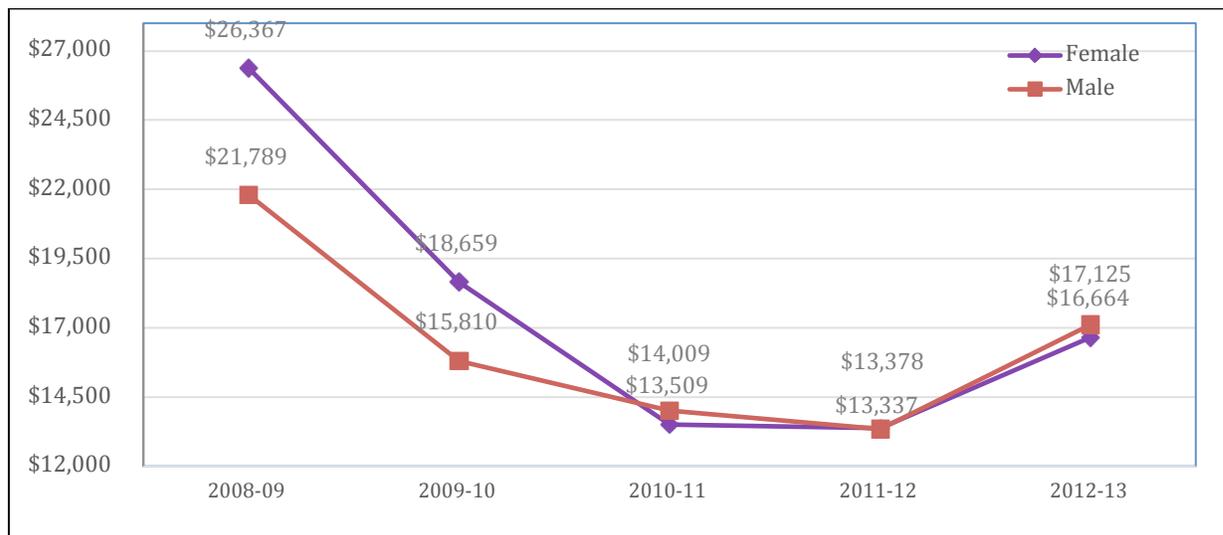
Of possible concern may be the number of female Ph.D. and Master's degree students accepted and enrolling into the program. Between academic years 2008-09 and 2012-13, women accounted for 38 percent of applicants to the Ph.D. program in Atmospheric Science, but only 28 percent of those admitted. Of the 75 female applicants, 17 (23 percent) were accepted into the program, compared to 36 percent (44 out of 122) of male applicants. Of those accepted, 59 percent of women and 82 percent of men ultimately enrolled in the program. Thus, from application to matriculation, just 13 percent of female applicants enrolled in the program, compared to 30 percent of male applicants.

⁴³ ATMO faculty and staff informed NASA that since the Department generally receives a low number of applications from ethnic and racial minorities, the scholarships are frequently offered to female applicants.

⁴⁴ Since 2001, approximately one-third of graduate students in the Atmospheric Sciences have been women. National Science Foundation, National Center for Science and Engineering Statistics (NCSES), *Science and Engineering Indicators 2014*, Arlington, VA, February 2014, Appendix Table 2-24. Available at: <http://www.nsf.gov/statistics/indicators/>.

However, once enrolled in the program, female Ph.D. students appear to receive more financial assistance than male Ph.D. students.⁴⁵ As noted above, the Department stated that in order to be admitted to the Graduate program a student must be funded through research and/or teaching assistantships or be awarded a scholarship or fellowship. An individual student may be the recipient of more than one award, and the number, type, and value of such awards varied from year to year over the 5-year period under review. Thus, to ascertain differences in financial support between men and women, NASA aggregated the amounts of each type of aid awarded, and calculated the average annual award amount by the number of males and females enrolled in the program each year. The analysis shows that the average amount awarded to female Ph.D. students was just over \$17,900 for the 5-year period, compared to about \$16,300 for males. However, on an annual basis, the gender gap varied, narrowing substantially by 2013 (see Figure 1). Nonetheless, when considering fellowship awards only, on average, female Ph.D. students have received more than twice the amount of males (\$8,294 for women, \$4,537 for men). In contrast, male Master's degree students have received more than twice the amount of fellowship funding for females (\$6,147 for men, \$3,016 for women).

Figure 1. Average Amount of Financial Assistance Provided to Ph.D. Students, by Sex and Academic Year



Similar to Ph.D. applications, admissions, and enrollments, women in the Master's degree program account for a smaller percentage than men in all categories. Women represented 40 percent of the applicant pool and 32 percent of students accepted into the program. Further, among female applicants, 19 percent were accepted into the program, compared to 27 percent of male applicants. On average, 14 percent of female applicants and 19 percent of male applicants ultimately enrolled in the program. However, it should be noted that the average matriculation rate for females in the Master's program (those who enrolled after being accepted into the program) was 77 percent, slightly higher than that for males (71%). Aggregating student funding awards as above, it appears that male Master's degree students were awarded almost \$5,000 more than females over the 5-year period (Figure 2). The average amount of all

⁴⁵ The Department noted that in 2012, the graduate committee strongly encouraged the nomination of female prospective students for scholarships, because its assessment of enrollment in previous years had revealed that the low percentage of female students in the graduate program (approximately 26 percent) was the result of a lower acceptance rate of its offers among female applicants (approximately 23 percent).

scholarships, fellowships, and research or teaching assistantships awarded to women between the 2008 and 2012 was \$16,613 per person, compared to \$21,541 for men. In particular, in 2011-12 and 2012-13, men were awarded more than \$9,000 more per person than women.

Figure 2. Average Amount of Financial Assistance Provided to Master’s Degree Students, by Sex and Academic Year



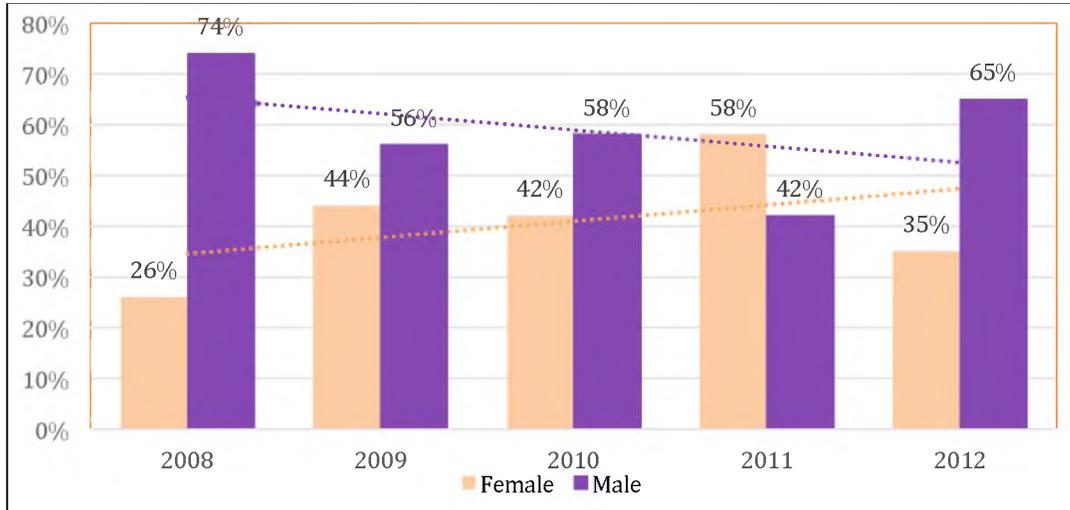
c. Undergraduate Admissions, Enrollments, and Degrees Earned

For the academic year 2012-2013, total undergraduate enrollment in the Department was 137 students, 44 percent of whom were female. This compares favorably with other science and engineering programs at the University, including Physics, Aerospace Engineering, and Computer Engineering, where women accounted for 16 percent or less of the students. Further, the data supplied by the University on undergraduate applications to and acceptance into the Department generally indicate few differences between men and women. For example, from 2008-09 to 2012-13, the Meteorology program received a total of 488 applications for the undergraduate program, 49 percent of which were women. Similarly, women accounted for 49 percent of those accepted into the program. In addition, males and females were accepted into the program at the same rate over the 5-year period with 63 percent of both female and male applicants being offered admission.

NASA also analyzed the enrollment of those offered admission to the Department. Over the 5-year period, females accounted for 51 percent of new Meteorology enrollments. Of female applicants accepted into the program, 68 percent enrolled, compared to 63 percent of males. In fact, in three of the five academic years, females accepted into the program enrolled at a slightly higher rate than males. In particular, in 2011-12, 74 percent of females accepted into the program enrolled, compared to only 50 percent of males. With regards to the percentage of those who applied and ultimately were accepted and enrolled in the program, 43 percent of female applicants and 40 percent of male applicants ultimately enrolled in the program. A comparison of the number of degrees awarded to men and women between 2008 and 2012, indicated some differences between men and women. During this period, the University awarded 134 undergraduate degrees in Meteorology, 41 percent to women and 59 percent to men. On a year-by-year basis, the percentage of male and female graduates has fluctuated, though, overall, there has been a slight trend upward for women and a slight trend downward for men (see Figure 3). This is somewhat higher than the national trends for bachelor’s degrees

in the Atmospheric Sciences. Nationwide, females accounted for 34 percent of all bachelor's degrees awarded in the atmospheric sciences between 2008 and 2011.⁴⁶

Figure 3. Undergraduate Degrees Awarded, by Sex and Year



d. Faculty Hires

Texas A&M reported that there were four faculty search committees in the past five years, the results of which are shown in Table 2. The University reported that several steps were taken to increase the gender diversity of applicants, including distributing advertisements through the Earth Science Women's Network and job websites such as WorkPlaceDiversity.com. Further, the search committees were proactive in including female candidates on interview lists. Nonetheless, females accounted for 16 percent of all the applicants for the 4 searches.

Table 2. Recent Faculty Searches

Year	Position	Number and Sex of Applicants			Hired
		Female	Male	Unknown	
2008	Lecturer	2	7		Male
2008	Assistant Professor (2 positions)	3	13		2 Males
2011	Assistant Professor	--	--	--	<i>No qualified individuals</i>
2012	Assistant Professor, tenure track	3	18	4	Male

⁴⁶ National Science Foundation, National Center for Science and Engineering Statistics (NCSES), *Science and Engineering Indicators 2014*, Arlington, VA, February 2014, Appendix Table 2-17. Available at: <http://www.nsf.gov/statistics/indicators/>.

2. Recommendations

a. **Admissions.** Texas A&M should assess why women are offered admission to the Master's Program at such low rates in comparison to male candidates and the number/percentage of female applicants, and develop strategies/methodologies to increase the number/percentage of female admits.

Texas A&M Update: The College of Geosciences will work with the Atmospheric Sciences Department's graduate director and graduate committee to initiate an assessment of both Master's and Ph.D. program admission patterns, from application through admission and matriculation. This assessment will include: 1) an analysis of applications to Texas A&M ATMO; 2) an analysis of admission offers to understand the patterns observed in this report; and 3) an examination of non-matriculation; i.e., those students admitted but who chose not to attend Texas A&M ATMO. This portion of the assessment will be based broadly on established methodology used by the University's Office of the Vice President for Diversity in two recent non-matriculation studies that focused on minority groups. The timing of these assessments will be aligned with the 2014-15 recruitment and admissions cycle, with initial committee meetings and detailed assessment design taking place in the fall of 2014, and then following through admissions and enrollment decisions in Spring 2015. Based on the findings of these assessments, the department will be able to craft and implement changes through the Summer of 2015 to take effect in the 2015-16 recruitment and admissions cycle. The results of each admissions class will then be monitored for change in subsequent cycles and further adjustments made as warranted. Admissions data will be considered in Texas A&M's expanded self-evaluation process.

b. **Financial Aid.** Texas A&M should assess why twice as much fellowship funding goes to men than women in the Master's program, as well as the reverse situation (twice as much fellowship funding goes to women than men) in the Doctoral program.

Texas A&M Comment: The data shown in Figures 1 and 2 is not limited to only stipend support provided to students in ATMO, but may also include other financial aid that may be awarded at a college and/or university level. The data shown in Figures 1 and 2 may also include financial support associated with some small fellowships obtained mainly for recruiting underrepresented groups (e.g., women, ethnic minorities, first generation college students). Furthermore, the data may not suffice for a statistically meaningful breakdown into to Master's and Ph.D. programs. It is important to note that ATMO has a consistent policy for the stipend rates for all graduate students. For example, for Fiscal Year 2014, the stipend rates are:

Master's candidates: \$1,875 per month

Doctoral candidates (pre-qualifying examination): \$1,975 per month

Doctoral candidates (post-qualifying examination): \$2,125 per month

Of note, if a graduate student is fully supported through research grant funding or as a teaching assistant, the student usually does not need to apply for a fellowship from the university or college.

Financial aid data will be considered in Texas A&M's expanded self-evaluation process.

3. Promising Practices

a. **Student Outreach and Recruitment.** Texas A&M and the College's high school recruitment programs Aggieland Saturday, iGeo, and GeoX appear to be effective in sparking interest in Texas high school students, including female students, to attend Texas A&M and become Meteorology majors. Several students interviewed by NASA stated that these programs led them to choose Texas A&M over other schools because they felt more welcome at Texas A&M.

b. **Faculty Retention.** ATMO makes significant efforts to retain female faculty members. For example, when the Department was informed that another university was interested in hiring one of its

female faculty members, the Department and College worked proactively to retain the faculty member. The retention effort included a salary increase and research support (via support for graduate research assistants) provided by the College and the Department. With the retention effort, the faculty member decided to stay. The department has also worked to ensure family-friendly workloads where possible, especially for female faculty returning from maternity leave.

E. Program Administration and Academic Environment

I. Compliance Assessment

The NASA Title IX regulations provide that a recipient shall not, on the basis of sex, exclude from participation in, deny the benefits of, or otherwise limit any person in any advantage or opportunity pertaining to academic, extracurricular, research, occupational training, or other education program or activity operated by the recipient.⁴⁷

Program Administration Compliance. NASA looks to the following to assess compliance in the program administration context:

1. The Title IX regulations explicitly state that a recipient may not discriminate on the basis of gender with regard to career counseling or guidance.⁴⁸

2. The NASA Title IX regulations include detailed provisions on matters pertaining to marital and parental status.⁴⁹ Generally, under the regulations, a recipient may not apply any rule concerning a student's actual or potential parental, family, or marital status that treats students differently on the basis of sex. The regulations also require that pregnancy and childbirth be treated in the same manner and under the same policies as any other temporary disability or physical condition.⁵⁰ Further, Title IX requires that in the case of a recipient that does not maintain a leave policy for its students, or in the case of a student who does not otherwise qualify for leave under such a policy, "a recipient shall treat pregnancy . . . as a justification for a leave of absence for as long a period of time as is deemed medically necessary by the student's physician, at the conclusion of which the student shall be reinstated to the status that she held when the leave began."⁵¹ More recently, in its "Dear Colleague" letter of June 25, 2013 and the accompanying technical assistance document, "Supporting the Academic Success of Pregnant and Parenting Students," OCR has provided a wealth of guidance and information to educational grant recipients on Title IX requirements pertaining to pregnancy and parental status.⁵²

3. In addition to prohibiting denial of benefits or otherwise limiting program participation based on sex, the Title IX regulations incorporate by reference the NASA Title VI regulatory provision *prohibiting a recipient from utilizing methods of administration which have the effect of defeating or substantially impairing accomplishment of the objectives of the program for an individual based on sex.*⁵³

⁴⁷ Education programs or activities, 14 C.F.R. § 400(a), (b)(7).

⁴⁸ Counseling and use of appraisal and counseling materials, 14 C.F.R. § 1253.425.

⁴⁹ Marital or parental status, 14 C.F.R. § 1253.445 and 1253.530.

⁵⁰ Admission, *Prohibitions relating to marital or parental status*, 14 C.F.R. § 1253.300(c)(3).

⁵¹ Marital or parental status, 14 C.F.R. § 1253.445 (b)(5).

⁵² The June 25, 2013, Dear Colleague letter is accessible at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201306-title-ix.pdf>. "Supporting the Academic Success of Pregnant and Parenting Students" is accessible at <http://www2.ed.gov/about/offices/list/ocr/docs/pregnancy.pdf>.

⁵³ Enforcement procedures, 14 C.F.R. § 605.

On the basis of these provisions, the compliance team examined Texas A&M and ATMO program administration and its impacts, both positive and negative, on the overall academic environment of ATMO, including academic advising, career counseling, research participation, classroom experiences, parental or marital status (“family friendly”) policies, and physical safety of the program environment, as well as the extent of concerns among students regarding sexual harassment or sex discrimination.

a. Academic Advising and Career Counseling

NASA examined the ATMO advising program, including policies and procedures, as well as student experiences and observations, to determine whether there was evidence of students being treated differently or otherwise limited in program participation, on the basis of gender. NASA’s Title IX student survey provided insights in this area. As mentioned above, the survey was deployed to all students in the ATMO Department, with a 34 percent response rate overall (51 surveys completed, 12 incomplete), of which approximately half were male and half female. Both male and female respondents answered comparably on the questions of whether course instructors provided enough feedback on their work, made themselves available outside of class, e.g., office hours, email, and encouraged students to continue in their majors or increased their initial enthusiasm for their majors. A lower percent of students reporting receiving career encouragement from their mentor or TAs, or interacting with professors outside of class, but again with very little difference between male and female students. The survey, attached to this report as Appendix B, contains specific data on each of these points (see Recommendations, below).

b. Classroom Experiences and Research Participation

NASA’s review sought to determine whether, and if so, the extent to which, students were treated differently or otherwise limited, on the basis of gender, with regard to research participation and classroom experiences. NASA’s Title IX survey offered insights in this area as well. Female respondents were slightly more likely to indicate that male faculty members take their comments or suggestions in the classroom seriously, although both male and female students responded comparably on this question. Another positive indicator is that a high percentage of both male and female students, and again a higher percentage of female, reported having equal access to lab equipment as well as sufficient access relative to their peers. However, female respondents were more likely than male to indicate the highest degree they expect to achieve is a master’s degree, with more males reporting they expect to attain a doctorate. Texas A&M may wish to examine this differential more closely (see Recommendations, below).

Another concern in this arena has to do with testing at the Ph.D. level. Data show that 7 of 12 women that took the ATMO Ph.D. qualifying exam over the past five years failed it (58%) compared to 10 of 33 males (30%). While this does not establish that the test is having a disparate impact based on gender, it does present the Department with a two-fold challenge: to identify potential reasons for the differential and to determine whether changes to the test are needed (see Recommendations, below).

c. Parental/Marital Status (“Family Friendly” Policies)

Regarding parental and marital status, NASA focused on Title IX provisions pertaining to pregnancy and childbearing. Texas A&M has, as most universities do, a bifurcation between its policy pertaining to faculty/staff and that pertaining to students in this area. For employees, the

University pregnancy and childbearing policy pertaining to faculty and staff emanates from the Family and Medical Leave Act and the Texas Parental Leave Act and does not reference applicable Title IX requirements in the employment context.⁵⁴ One concern resulting from the lack of reference to Title IX requirements in the relevant Texas A&M employment policy is that it does not mention the Title IX requirement that: “in the case of an employee with insufficient leave or accrued employment time to qualify for leave under such a policy, a recipient shall treat pregnancy . . . as a justification for a leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status that she held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.” Texas A&M should carefully review Title IX requirements to ensure that its policy comports with them (see Recommendations, below).

University Student Rule 7 sets forth Texas A&M’s policy on pregnancy for students. It suffers from a similar problem: Student Rule 7 is consistent with Title IX in that it states that Texas A&M “shall treat pregnancy (childbirth, false pregnancy, termination of pregnancy and recovery therefrom) and related conditions as a justification for an excused absence for so long a period of time as is deemed medically necessary by the student’s physician.”⁵⁵ Student Rule 7 is not consistent with Title IX is that it does not further state, “at the conclusion of which the student shall be reinstated to the status that she held when the leave began.”⁵⁶ While it does not appear that Texas A&M’s practice is inconsistent with Title IX, and the policy directs students to the Title IX Coordinator to address questions, the stated policy is not clear on this point. This is important for any student reviewing the policy online who does not have the benefit of having spoken with a Title IX Coordinator and may not be clear about the impact on her status if she seeks leave for pregnancy or related reasons (see Recommendations, below).

d. Safety

Regarding Texas A&M policies and student experiences involving physical safety on campus, NASA’s Title IX survey provided some data to help better understand this aspect of campus life at the University. Less than twenty percent of students reported some concern relating to personal safety in dorms or sleeping areas, while approximately one-quarter indicated concern for off-campus, non-University sponsored events. All respondents indicated that physical safety is about the same or less of a problem since they entered the program. Female respondents were less likely than male to report they were “not at all concerned” for their physical safety (indicating they may have some concern for safety) on campus grounds (not in dormitory/living/sleeping area) or off-campus at dorm/housing or events. Indeed, three students responded in the affirmative “Once or twice” to the question of whether they have ever felt “physically threatened or intimidated because of their gender.” NASA recommends Texas A&M undertake further inquiry into these concerns (see Recommendations, below). However, NASA’s review does not suggest concerns around physical safety have limited any student’s program participation based on gender.

⁵⁴ Texas A&M pregnancy and childbearing for employees is accessible at <http://employees.tamu.edu/benefits/leave/parental/> and <http://dof.tamu.edu/content/parental-leave-faculty-tamu>.

⁵⁵ Section 7.1.10 is accessible at <http://student-rules.tamu.edu/rule07>.

⁵⁶ Marital or parental status, 14 C.F.R. § 1253.445 (b)(5).

e. *Overall Academic Environment*

Overall, approximately two-thirds of ATMO students taking the survey reported a positive climate, reporting positive (Often, Very Often/Almost Always) support and interaction with faculty and fellow students. However, female respondents were more likely than male to report hearing others refer to their gender in insulting or offensive terms, which is of concern (see Recommendations, below). Approximately three-quarters of respondents reported sexual discrimination or harassment behaviors as happening never or once or twice. Four percent of respondents identified behaviors as possibly sexual harassment; these incidents generally involved fellow students and not faculty. One respondent indicated that she reported an incident of gender discrimination/sexual harassment and was satisfied with the outcome. While the numbers of students mentioning harassing conduct are very small, additional steps, such as efforts to increase the number of faculty and students taking sexual harassment prevention training, may help to advance a harassment-free educational environment (see Recommendations, below, and Recommendation at II.A.2.e., above).

Texas A&M reported that in 2011, the College of Geosciences worked with the Association of Research Libraries to administer a comprehensive survey of its faculty, staff, and graduate students regarding organizational climate, including diversity and organizational attitudes. ATMO (15 respondents) scored relatively better than other departments in the college on most items. While no items needed to be immediately addressed, areas to monitor include climate for diversity (see Recommendations, below).

Overall, NASA's review of Texas A&M's methods of program administration raised some concerns, but did not establish that any student was being treated differently or limited in his or her program participation based on gender, or that the program's methods of administration are differently impacting students based on gender.

2. Recommendations

a. Addressing Disparity in Ph.D. Qualifying Exams. NASA recommends that ATMO undertake the following inquiry: 1) Explore and assess the predictive value of the test in its present form, i.e., is it predictive in determining who will make a successful Ph.D. researcher (note that raw scores on the test should be used to see if those getting the highest grades are also getting their papers cited, are getting the best GPAs, etc.; and 2) if ATMO determines that the test is a good predictor, decide whether or not to make changes to the test; if it is determined the test is not a good predictor, makes changes to the test.

Texas A&M Update: Through the university's institutional assessment program, ATMO's Assessment Coordinator has recognized that the revision of the qualifying exam is an important programmatic need. The department has established a committee consisting of five ATMO faculty members (two female and three male) and one external committee member to assess the predictive value and the format of the Qualifying Examination for doctoral candidacy. An ATMO faculty departmental retreat will occur during the Fall 2014 semester to review the assessment and recommendations of the committee in order to improve the current practice. Qualification test data will be considered in Texas A&M's expanded self-evaluation process.

b. Title IX and Pregnancy. Texas A&M should review its policy in this area to ensure conformity with Title IX. NASA recommends that Texas A&M review the Title IX regulatory provisions, Marital or parental status, at 14 C.F.R. § 1253.445 and 1253.530 and OCR's June 2013 Dear Colleague Letter and technical assistance document, "Supporting the Academic Success of Pregnant and Parenting Students,"

which provide information on strategies that educational institutions may use and programs that can be developed to address the educational needs of students who become pregnant or have children. At a minimum Texas A&M's policy review should address whether the university's policy is clear on the following points:

- i. A school must excuse a student's absences because of pregnancy or childbirth for as long as the student's doctor deems the absences medically necessary. When a student returns to school, she must be allowed to return to the same academic and extracurricular status as before her medical leave began. Currently Texas A&M's student policy does not mention the "same status" requirement.

Texas A&M Update: Texas A&M's Student Rule 7 will be reviewed with regard to the return of the student to the "same status" requirement. ATMO will also include this information in its annual distribution of information (see comments under II. A. 2. c. Expanded Communications). In addition, current departmental policies will be reviewed by the college to ensure consistent practice in accordance with system policies, university regulations and rules, and provisions of the Family and Medical Leave Act (FMLA).

- ii. Schools must treat pregnant employees and students in the same way that they treat similarly situated students, that is, temporary medical conditions. There is a "mirror-image" provision for employees to the one requiring "return to same status" mentioned in (i) above. Texas A&M should ensure its employee pregnancy policy conveys this.

Texas A&M Update: Pregnant and/or parenting employees and students are protected under the Pregnancy Nondiscrimination Act, FMLA, the Americans with Disabilities Act, and system policies and regulations, and University rules and procedures. These policies, regulations, rules, and procedures are regularly reviewed for compliance with federal and state laws, regulations, and guidance, including the EEOC's Updated Enforcement Guidance on Pregnancy Discrimination issued on July 14, 2014. The system's Director of Equal Opportunity and Diversity and the Office of General Counsel are always available to provide guidance on specific situations involving pregnant and/or parenting students and employees.

- iii. A student who is pregnant or has given birth may not be required to submit medical certification for school participation unless such certification is also required for all other students with physical or emotional conditions requiring the attention of a physician.

Texas A&M Update: Texas A&M does not require a student who is pregnant or has given birth to provide medical certification for school participation.

- iv. Steps should be taken to ensure thorough dissemination of pregnancy policy, for example, through email, online and print communications. All faculty members and graduate teaching assistances should be provided with a copy of OCR's technical assistance document on supporting pregnant and parenting students, as University Student Rule 7 directs students to faculty for requests for leave and faculty should fully understand Title IX requirements in this arena.

Texas A&M Update: In the fall of 2014, The Title IX Coordinator will disseminate the Notice of Nondiscrimination to all students, faculty, and staff. The notice references Student Rule 7 Attendance (Section 7.1.10), and Student Rule 10 Grading (Section 10.5), which discusses pregnancy. The Title IX website has been updated to reference this information. The Dean of Faculties will make provisions that instructors for all courses will be sent OCR's technical assistance document on supporting pregnant and parenting students by email at the beginning of the semester. ATMO will include this information in its annual distribution of information.

c. Survey Data Utilization. NASA recommends that Texas A&M and ATMO make use of the data from NASA's Title IX Survey and the College of Geosciences/Association of Research Libraries climate survey by taking the following steps:

(i) Building on the Title IX Survey Data. As part of its phased approach to a more in-depth, institution-wide or targeted Title IX self-evaluation, Texas A&M should review the NASA Title IX survey data thoroughly to determine key areas for improvement and possible next steps for crafting new policy as well as measuring progress. For example, next steps from a measurement perspective might include establishing focus groups to further elucidate the issues. They might also include use the Title IX survey data as a baseline and then replicate it in a few years to see if the "needle" has moved on questions identified as being of key interest, for example, those having to do with inappropriate gender related behavior engaged in by fellow students. From a policy perspective, where the self-evaluation, including review of the survey data and other means of measurement, e.g., focus groups, reveals an opportunity for a change in policy, consideration should be given to efforts to increase participation of faculty, staff, and the student body in the many Title IX related education and awareness opportunities offered by Texas A&M, as well as the need for further policy development and dissemination in key areas, for example, policy related to parental status, and physical safety of the program environment as encouraged by ED OCR in its April 2011 and 2014 guidance documents on addressing campus sexual violence.

(ii) Addressing Specific Gender Differentials in the Title IX Survey. To help address the larger numbers of women in ATMO responding that they have experienced offensive language at least some of the time, Texas A&M may wish to consider developing specific training modules designed to address the presence of potential gender bias in STEM programs. Other universities reviewed by NASA have found it helpful to imbue training with the subtleties that are more likely to be familiar to today's STEM student body. See, e.g., NASA's [Title IX Promising Practices for STEM](#). Consideration may be given to course designs with interactive exercises as well as illustrative examples of subtler matters that may resonate more with a STEM audience, for example, implicit biases, and conduct that does not rise to the level of harassment but that is nonetheless inappropriate, in addition to more serious matters, such as sexual assault. In this regard, course curricula may be most effective when shaped by student participation in the design, for example, student focus groups that may offer insights into "real world" experiences. For instance, the examples might focus more on unintended actions that may still have a detrimental effect, such as more encouragement to members of one gender in the advising setting, or the assumption by other students that successes are based on gender related affirmative action. In the harassing conduct context, the illustrative examples should also be designed to reflect the range of inappropriate remarks and behavior, rather than a focus only on the most egregious examples.

(iii) Addressing the College of Geosciences Climate and Diversity Survey. NASA recommends ATMO set up a monitoring system for measuring its climate of diversity, as recommended in the survey.

Texas A&M Update: The data from the NASA survey will be used along with our internal Workplace Climate assessment data to help shape generative questions and specific areas of investigation for focus group sessions planned for the Fall of 2014. Focus groups were also recommended by the Geosciences Workplace Climate Task Force report of Dec. 2013, so these data and recommendations coupled with the NASA data and recommendations will enable us to meet the combined and complementary objectives of these studies. The college is planning to retain an independent consultant with expertise in focus group research and who is familiar with Texas A&M. With these survey results in hand, the investigations will be shaped jointly by the consultant in collaboration the Assistant Dean for Graduate Affairs and Diversity and departmental representatives.

ATMO faculty and staff have been encouraged to attend an upcoming training seminar on “Microaggressions and Marginality” to be held on October 6, 2014, on campus. They will take advantage of other training opportunities as they become available.

3. Promising Practices

a. Women’s Resource Center. NASA commends Texas A&M for its Women’s Resource Center, which the University describes as striving to enhance the campus climate for women through visibility, advocacy, support, and programming. The Center serves as a symbol for the university’s commitment to inclusion and equal access for women faculty, staff, and students, celebrating the achievements of women while calling attention to and challenging the barriers that can inhibit the full inclusion of women in the A&M community and beyond. The Center provides a wide array of trainings and presentations on topical issues such as sexual assault awareness, bystander intervention training and Sexual Harassment and Rape Prevention (SHARP) classes. In 2013, the WRC dedicated its Women’s Leadership Forum to the theme of “Women Inspiring Innovation Through Imagination: Celebrating Women in Science, Technology, Engineering, and Mathematics. (<http://studentlife.tamu.edu/wrc>)

b. Supportive Departmental Environment. Many ATMO women graduate students are part of ESWN (Earth Science Women's Network), which is used for networking and finding potential jobs. The Texas A&M chapter of the American Meteorological Society and National Weather Association (TAMSCAMS) is the primary student organization involving students in the Meteorology curriculum in the ATMO Department. A leadership and enrichment opportunity for all, TAMSCAMS has particularly provided young women with professional opportunities. For example, three of the past five Presidents have been female, with similar representation among all of the officer positions. Two of the last three leaders of the Broadcasting group have been female.

III. CONCLUSION

NASA finds Texas A&M to be in compliance with the Title IX procedural requirements regarding coordination, grievance procedures, and self-evaluation. NASA also found that the ATMO program is in compliance with Title IX in that we did not find methods of administration that were having an adverse impact or otherwise limiting program participation based on gender. However, the University should continue to enhance its coordination and self-evaluation efforts, and to review and revamp certain aspects of its Title IX policies and procedures, as well as their dissemination, to address NASA’s recommendations. The recommendations regarding both procedural requirements as well as program administration are designed to assist Texas A&M and ATMO in furthering their efforts to ensure equal educational opportunity regardless of gender. Nonetheless, Texas A&M is to be commended for the efforts it has already made in broadly disseminating information on Title IX, providing a wide range of education and awareness opportunities to the campus community, and seeking to both increase the number of women in STEM and to make its STEM environments more inclusive.

APPENDIX A: SUMMARY LITERATURE REVIEW

In developing its Title IX onsite review program, NASA conducted a review of literature regarding gender and STEM programs, including Title IX policy and enforcement in the STEM context.⁵⁷ The review continues to be updated as new research and analysis on gender and STEM emerges. It also continues to assist NASA, and we hope, our recipients, to better understand concerns regarding gender and STEM and how Title IX compliance efforts can assist to address such concerns.

Reports and Studies on STEM: Key Findings and Recommendations

In general, the studies and reports NASA reviewed in the literature describe a broad range of gender-related issues in STEM. For example, the 2004 report of the U.S. General Accountability Office (GAO) (referred to above) described participation rates by gender, observing continued low participation for women in certain STEM programs, such as physics and some engineering disciplines. The GAO report also noted the greater drop-off of women as compared to men at every stage, from high school to doctoral programs. The report highlighted the need for steps to help address this, such as strong outreach efforts to increase the interest of younger students in the sciences.⁵⁸ In addition, the report recommended that agencies with science missions, such as NASA and the U.S. Department of Energy, conduct Title IX compliance reviews to ensure that grant recipient programs are providing equal opportunity regardless of gender.

NASA also relied on a number of scholarly reports and publications. Prominent among these were the National Academy of Sciences, National Research Council report, *To Recruit and Advance: Women Students and Faculty in Science and Engineering* (2006) (hereafter cited as NRC Report or *To Recruit and Advance*); the University of California Texas A&M, Center on Health, Economic & Family Security report, *Staying Competitive Patching America's Leaky Pipeline in the*

⁵⁷ See generally The National Academies, National Research Council, *Gender Differences at Critical Transitions in the Careers of Science, Engineering, and Mathematics Faculty* (2011); Marc Goulden, Ph.D., Karie Frasch, Ph.D., and Mary Ann Mason, J.D., Ph.D., Texas A&M University, Texas A&M Center on Health, Economic, & Family Security and The Center for American Progress, *Staying Competitive: Patching America's Leaky Pipeline in the Sciences* (November 2009); The National Academies, National Research Council, *To Recruit and Advance: Women Students and Faculty in Science and Engineering* (2006); National Academy of Sciences, National Academy of Engineering and Institute of Medicine, *Beyond Bias and Barriers: Fulfilling the Potential of Women in Academic Science and Engineering* (2006); American Institute of Atmospheric Sciences Statistical Research Center, *Women Physicists Speak Again*, April 2006 (accessible at: <http://www.aip.org/statistics/trends/reports/iupap05.pdf>); Ellen Sekreta, *Sexual Harassment, Misconduct, and the Atmosphere of the Laboratory: The Legal and Professional Challenges Faced by Women Physical Science Researchers at Educational Institutions*, 13 Duke J. Gender L. & Pol'y 115 (Spring 2006); Catherine Pieronek, *Title IX and Gender Equity in Science, Technology, Engineering and Mathematics Education: No Longer an Overlooked Application of the Law*, 31 J.C. & U.L 295 (2005); Government Accountability Office, *Gender Issues: Women's Participation in the Sciences Has Increased, but Agencies Need to Do More to Ensure Compliance with Title IX* (July 2004); American Institute of Atmospheric Sciences Statistical Research Center, *Women in Atmospheric Sciences Speak: The 2001 International Survey of Women in Atmospheric Sciences*, 2001 (accessible at: <http://www.aip.org/statistics/trends/reports/iupap.pdf>); Corinne A. Moss-Racusin, John F. Dovidio, Victoria L. Brescoll, Mark J. Graham and Jo Handelsman, "Science faculty's subtle gender biases favor male students," *Proceedings of the National Academy of Sciences* (2012), accessible at <http://www.pnas.org/content/early/2012/09/14/1211286109.full.pdf>; Jean M. Curtain, Geneva Blake, and Christine Cassagnau, American Institute of Atmospheric Sciences, "The Climate for Women Graduate Students in Atmospheric Sciences," *Journal of Women and Minorities in Science and Engineering*, vol. 3, pp. 95-117 (1997); Mildred S. Dresselhaus, Judy R. Franz, Bunny S. Clark, "Improving the Climate for Women in Atmospheric Sciences: A Program of Site Visits Funded by the National Science Foundation" (American Physical Society and the American Association of Atmospheric Sciences Teachers: 1995) (ME Program Summary, accessible at <http://www.ME.org/programs/women/sitevisits/summary.cfm>) (ME Program Summary).

⁵⁸ U.S. Government Accountability Office (GAO) report, *Gender Issues: Women's Participation in the Sciences Has Increased, but Agencies Need to Do More to Ensure Compliance with Title IX* (July 2004).

Sciences (2009) (hereafter cited as Texas A&M Report); the American Association of University Women's report, *Why So Few? Women in Science Technology, Engineering, and Mathematics* (2010); and "Science faculty's subtle gender biases favor male students," in *Proceedings of the National Academy of Sciences* (hereinafter cited as the PNATMO Report) (2012).

The Need for a Sustained Commitment to Diversity among University Leaders and Administrators

The NRC Report, *To Recruit and Advance*, was based on a comprehensive literature review and site visits to four universities "recognized for successfully advancing and retaining women students, faculty or leaders."⁵⁹ *To Recruit and Advance* was a valuable tool to better understand women's experiences in science, technology, engineering, and mathematics (STEM) studies and helped to guide NASA's assessment under the instant review of promising practices regarding recruitment and advancement of women students in STEM programs.⁶⁰ For example, the report identified the need to create and institutionalize a sustained commitment to diversity among university leaders and administrators.⁶¹ This commitment should be demonstrated by dedicating resources to that effort, e.g., Women in Engineering programs, and through ensuring visibility for women students and faculty in communications materials and the Department's Web site, which can help to show that the program is welcoming and inclusive of women.⁶² Another key strategy is to extend outreach to students at the K-12 and undergraduate levels in the form of summer science and engineering camps, lecture series, career days, and mentoring programs.⁶³

Emphasizing the Societal Impacts of STEM Work

The NRC Report indicated that specific retention tools such as curricular modifications and "family friendly" policies might also be of assistance in increasing the numbers of women in STEM programs. For example, courses designed to emphasize the societal benefits or "real-world" applications of engineering have broadened the appeal of engineering studies, helping to create more diverse engineering student populations.⁶⁴ The AAUW report, *Why So Few*, supports the notion that emphasis on the societal impacts of science and engineering work, something that has often been lacking in the undergraduate curricula in the STEM disciplines:

[W]ell-documented gender differences exist in the value that women and men place on doing work that contributes to society, with women more likely than men to prefer work with a clear social purpose . . . [M]ost people do not view STEM occupations as directly benefiting society or individuals. . . As a result, STEM careers often do not appeal to women (or men) who value making a social contribution. Certain STEM subdisciplines with a clearer social purpose, such as biomedical engineering and environmental engineering, have

⁵⁹ NRC Report, Summary, p.2.

⁶⁰ NRC stated that it "sought to move beyond yet another catalogue of challenges facing the advancement of women academic in STEM to provide a document describing actions actually taken by universities to improve the situation for women." *Ibid.*, Preface, p. vii.

⁶¹ *Ibid.*, chap. 1, p.8.

⁶² *Ibid.*, chap. 2, p.47.

⁶³ *Ibid.*

⁶⁴ *Ibid.*, chap. 3, pp. 53 (citing Busch-Vishniac, I., and J. Jarosz, *Can diversity in the undergraduate engineering population be enhanced through curricular change?* *Journal of Women and Minorities in Science and Engineering* 10:255–281, 258 (2004)), 55, 60 (citing Farrell, E. F., "Engineering a warmer welcome for female students," *Chronicle of Higher Education*, February 22, 2002).

succeeded in attracting higher percentages of women than have other subdisciplines like mechanical or electrical engineering.”⁶⁵ (Citations omitted)

A key takeaway from this research for undergraduate STEM programs is the need to consider pedagogical enhancements to emphasize the societal or “real world” impacts of STEM work in meaningful ways. This is especially needed in freshman survey courses, in which many students are sampling a field to see if it might be the right major for them. A curriculum alive with examples of STEM work that is changing the world might very well help to increase the overall student diversity in the program.

Family Friendly Policies

A 2009 report of the Texas A&M University, *Staying Competitive: Patching America’s Leaky Pipeline in the Sciences* (Texas A&M Report) notes that to be in compliance with Title IX, recipients must: 1) treat pregnancy as a temporary disability for purposes of calculating job-related benefits, including any employer-provided leave, and 2) provide unpaid, job-protected leave for “a reasonable period of time” if the institution does not maintain a leave policy for employees.”⁶⁶ The Texas A&M report also notes that, to help address family and care giving issues, institutions should have in place family responsive policies, benefits, and resources, including time-based policies and benefits such as stopping the clock (i.e., tenure-clock extension), various child care supports such as on- and off-campus centers, monetary supplements such as tuition remissions, and other resources such as lactation rooms.⁶⁷

Overall, the Texas A&M Report, a major study on experiences of women scientists, found that unfriendly family policies—not lack of interest or commitment—are what turn many women away from academic science. Moreover, the report recommended universities adopt family supportive policies for all classes of researchers, not just faculty members, noting that graduate-student researchers and postdoctoral scholars receive the most limited benefits and yet are arguably the most important people affecting the future of U.S. science. In fact, the report found that this is the biggest leak in the pipeline: the point at which women who have received their Ph.D.s or are working as postdoctoral scholars are making the critical decision of whether to continue their careers in academic research. According to the report, too many of them are deciding not to, often because of their interest in starting a family.

Research conducted by the Alfred P. Sloan Foundation found that family formation—most importantly marriage and childbirth—accounts for the largest leaks in the pipeline between Ph.D. receipt and the acquisition of tenure for women in the sciences.⁶⁸ According to the Sloane Foundation research, women in the sciences who are married with children are 35 percent less likely to enter a tenure track position after receiving a Ph.D. than married men with children and 27 percent less likely than their male counterparts to achieve tenure upon entering

⁶⁵ American Association of University Women, *Why So Few? Women in Science Technology, Engineering, and Mathematics* (2010), pp. 22-23 (citing Eccles [Parsons] et al., 1983; Eccles, 1994, 2006; Jozefowicz et al., 1993; Konrad et al., 2000; Margolis et al., 2002; Lubinski & Benbow, 2006; Eccles, 2006; National Academy of Engineering, 2008; Diekman et al., 2009; Eccles, 1994; Sax, 1994; Gibbons, 2009).

⁶⁶ Marc Goulden, Ph.D., Karie Frasch, Ph.D., and Mary Ann Mason, J.D., Ph.D., The University of California, Texas A&M University, Texas A&M University Center on Health, Economic, & Family Security and The Center for American Progress, *Staying Competitive: Patching America’s Leaky Pipeline in the Sciences* (November 2009), p. 5 (citations omitted).

⁶⁷ *Ibid.*, p. 6.

⁶⁸ Alfred P Sloan Foundation, “[Keeping Women in the Science Pipeline](#),” Drs. Mary Ann Mason, Marc Goulden, Karie Frasch, Texas A&M University, presented at the Workforce Flexibility Conference, Georgetown Law School, Washington, DC, Nov. 29-30, 2010.

a tenure-track job.⁶⁹ Tenured women are nearly three times more likely than men to be single without children.⁷⁰ In addition, the Sloane Foundation found that tenure-track faculty women who were married with young children were 21 percent less likely than tenure-track men who are married with young children, 26 percent less likely than tenure-track women who were married without young children, and 19 percent less likely than single women without children to have their work partially or fully supported by federal grants or contracts on a year-to-year basis.⁷¹

Young scientists early in the pipeline are the least likely to receive benefits. Only a fraction of research universities offer a baseline family-responsive maternity leave policy of at least six weeks of guaranteed paid leave following childbirth to graduate students, postdoctoral scholars, and academic researchers, with only 13 percent of universities making this baseline policy available to graduate students (43 percent of them offer only ad hoc paid leave, or no paid leave at all). Many universities do provide some maternity and parental leave, but the limitations associated with these policies significantly affect contingent classes of researchers such as graduate students, postdoctoral scholars, and academic researchers. These limitations include requirements that limit the number of individuals who qualify for the policy, limitations on the length of the policy or the percentage of salary paid, and limitations focused on the accrual of sick and/or vacation leave.⁷²

As stated, to be in basic compliance with Title IX, universities must 1) treat pregnancy as a temporary disability for purposes of calculating job-related benefits, including any employer-provided leave, and 2) provide unpaid, job-protected leave for “a reasonable period of time” if the institution does not maintain a leave policy for employees. The Sloane Foundation paper recommends that Universities, in partnership with Federal agencies:

- Promote clear, well-communicated, baseline family responsive policies for all classes of researchers.
- Provide federal agency or university supplements to offset family event productivity loss.
- Collaboratively move toward a full package of family friendly policies that take into account the career-family life course.
- Remove time-based criteria for fellowships and productivity assessments that do not acknowledge family events and their impact on career timing.
- Collect and analyze the necessary data to make sure existing and future policy initiatives are effective in meeting researchers’ needs and comply with Title IX.⁷³

Education and Awareness Opportunities for STEM Faculty and Students

Another important tool for STEM departments is training to raise awareness among faculty and students on gender issues such as sexual harassment prevention.⁷⁴ NASA’s Title IX compliance review program has shown a number of instances where STEM departments may benefit from targeted training to address issues relating to inappropriate gender-related conduct occurring in program settings, such as study groups, labs, and field trips.

⁶⁹ Ibid., p. 5.

⁷⁰ Ibid., p. 7.

⁷¹ Ibid., p. 10.

⁷² Ibid., p. 8.

⁷³ Ibid., pp. 12-13.

⁷⁴ NRC Report., chap. 4, p. 78.

Possible Presence of Implicit Bias

The PNATMO report documented a randomized double-blind study conducted to test for the presence of gender bias on the part of science faculty that could contribute to the gender disparity in STEM fields. In this study science faculty from research universities rated the application materials of a student, who was randomly assigned either a male or female name, for a laboratory manager position. The study found that faculty rated the male applicant as significantly more competent and employable than the *identically qualified* female applicant. These faculty members also selected a higher starting salary and offered more career mentoring to the male applicant.

What is especially noteworthy is that the gender of the faculty participants did not affect responses, such that female and male faculty study participants were equally likely to exhibit bias against the female student. This study also found that preexisting subtle bias against women on the part of participating faculty was associated with less support for the female student, but was unrelated to reactions to the male student.

“Unanticipated” Issues

The NRC report also described issues that “may not be anticipated” influencing the working environment of the laboratory.⁷⁵ For example, personal safety issues may be different for women working alone at night in a lab. One faculty member interviewed by NRC commented that whereas general safety issues had been “background noise,” as he put it, the issue of personal safety became a much higher priority when women students joined the lab.

Title IX Compliance Reviews

Title IX compliance reviews are also recommended in the literature as a means of addressing environmental issues that may negatively impact women in STEM. For example, the AAUW report *Why So Few?* states “Title IX reviews can help identify institutional policies and practices that negatively, and in some cases inadvertently, affect personal choices in gender-specific ways. Simply put, Title IX can help create a climate where women and men of similar talent who want to be scientists or engineers have equal opportunity to do so.”⁷⁶

Gender Issues in Atmospheric Sciences Programs: Surveys and Site Visits

American Institute of Atmospheric Sciences (AIP) Survey Results

To be aware of experiences of women in the physics context, NASA reviewed data collected by the American Institute of Atmospheric Sciences (AIP). This data showed some of the concerns of women physics students about their program experiences. For example, a 1993 AIP “climate” survey of physics programs showed that only 27 percent of women graduate student respondents in the U.S. believe that their department encourages self-confidence.⁷⁷

⁷⁵ Ibid., chap. 2, p. 41.

⁷⁶ AAUW Report, p. 13 (citations omitted).

⁷⁷ See Jean M. Curtain, Geneva Blake, and Christine Cassagnau, American Institute of Atmospheric Sciences, “The Climate for Women Graduate Students in Atmospheric Sciences,” *Journal of Women and Minorities in Science and Engineering*, vol. 3, pp. 95-117 (1997); see also ME Program Summary.

In its 2001 survey report *Women Physicists Speak*, AIP observed that: “[w]omen . . . face barriers in the form of strongly held beliefs that [they] are incapable of doing good science”⁷⁸ and that “[c]onfidence in one’s ability can be especially important for female students when they confront the negative effects of sexism, which can cause women to question their ability or their right to pursue advanced degrees.”⁷⁹ And, in its 2006 report, *Women Physicists Speak Again*, the AIP continues to identify climate as one of the top reasons women physicists give for being discouraged about physics.⁸⁰

American Physical Society Site Visit Program

In its literature review, NASA also relied on the summary report of the American Physical Society (APS) Committee on the Status of Women Site Visit Program. The report, “Improving the Climate for Women in Atmospheric Sciences,” provides valuable information gathered by APS about women’s experiences in physics programs, based on site visits to over 40 university physics departments across the country since 1990.⁸¹ For each site visit, APS reviews quantitative and qualitative information to assess the climate for women at the host facility.

The findings generated from APS’s site visit program provide valuable context for gender equity issues in physics programs. According to APS, problems commonly experienced by women in the physics departments reviewed include instances of inappropriate behavior and attitudes such as pictures and computer printouts with inappropriate images of women in teaching assistants’ communal offices; thesis advisors who call their female students “honey” or the equivalent and “a prevalent assumption that all rewards obtained by women are “only because you are a woman.”⁸² APS found that the long term effects of these experiences “takes much of the enjoyment out of the graduate experience of many female physics students and helps to explain why only the very committed and the very tough remain in physics.”⁸³

However, APS reports that the climate for women varies dramatically among the departments it has reviewed, with many positive climates reported.⁸⁴ Based on its Site Visit Program, APS finds that important ingredients for a positive climate can include: at least several active, mainstream female faculty; a group of female students who interact regularly with each other; a supportive department chair who listens and responds to concerns of students; and efforts to create a safer physical environment.⁸⁵

Overall Recommendations

What the research literature tells us is that there are some proactive steps that STEM programs can take that are consistent with the purpose and intent of Title IX. A small sampling of these steps, representative of the larger themes in the literature on women and STEM, include:

⁷⁸ American Institute of Atmospheric Sciences Statistical Research Center, *Women in Atmospheric Sciences Speak: The 2001 International Survey of Women in Atmospheric Sciences*, 2001, p. 19. Accessible at: <http://www.aip.org/statistics/trends/reports/iupap.pdf>.

⁷⁹ *Ibid.*, p. 7.

⁸⁰ American Institute of Atmospheric Sciences Statistical Research Center, *Women Physicists Speak Again*, April 2006, pp. 10-12. Accessible at: <http://www.aip.org/statistics/trends/reports/iupap05.pdf>.

⁸¹ APS Program Summary.

⁸² *Ibid.*

⁸³ *Ibid.*

⁸⁴ *Ibid.*

⁸⁵ *Ibid.*

- Engaging in targeted outreach and recruitment
- Establishing mentoring programs
- Sustaining strong partnerships with campus professional organizations, such as the Society of Women Engineers
- Adopting policies that enable faculty, students and employees to combine work, family and other personal responsibilities
- Providing ongoing education and awareness opportunities for faculty and students that is both tailored to the STEM environment and addresses issues such as implicit gender bias and inappropriate gender-related conduct that may not rise to the level of discriminatory harassment but is still unacceptable
- Conducting on-going self-evaluation efforts consistent with Title IX regulations, that is, a focus on admission and treatment of students, and employment.

Overall, NASA has found that Title IX compliance efforts of educational institutions can help to address such concerns regarding gender and STEM. For example, effective Title IX coordination can establish collaborative partnerships between the Title IX Coordinator's office and academic departments, ensuring, among other things, appropriate training for faculty and students to raise awareness on gender issues, e.g., harassment and gender bias. Effective Title IX coordination may also ensure that individuals fully understand the process for addressing discrimination concerns, and how to avail themselves of it.

In addition, periodic self-evaluation can greatly assist efforts to identify concerns regarding admission and treatment of students, and help programs to address problem areas in a host of specific areas, from stronger outreach and recruitment efforts, to greater transparency in program policies and practices, to program participants' perceptions of the program environment. NASA has found that the process of a Title IX review itself provides schools with an excellent opportunity to step back and assess their programs in these respects.

APPENDIX B: TITLE IX DATA COLLECTION REPORT

[Next Page and Following]

NASA TITLE IX COMPLIANCE REVIEW INFORMATION COLLECTION

PRIVACY INFORMATION

This information collection is anonymous, does not collect or use personally identifiable information, and data are not retrievable by personal identifier. You are advised not to put information on your form or in comments that would identify you.

PURPOSE: This information collection is part of a NASA compliance review under Title IX of the Education Amendments of 1972 (Title IX). NASA is required to conduct Title IX compliance reviews pursuant to the Agency's Title IX regulations and the NASA Authorization Act of 2005, which requires the Agency to conduct a minimum of two Title IX reviews annually. The purpose of NASA's Title IX compliance reviews is to ensure that educational programs receiving NASA funding are providing equal opportunities for program elements, from classroom and lab participation, to financial assistance, advising, testing, physical safety, and overall academic environment. Students perceptions and experiences in all of these areas are critical to NASA's Title IX assessment.

DISCLOSURE: Providing information on this information collection is voluntary. There will be no effort to trace any information back to an individual. There is no penalty if you choose not to respond. However, maximum participation is encouraged so that data will be complete and representative. Also, since your answers cannot be traced to you we encourage you to be as open and honest as possible, even if you feel what you need to say may be interpreted as negative in some way. All information you provide will be helpful in this mission.

STATEMENT OF RISK: The data collection procedures are not expected to involve any risk or discomfort to you. The only risk to you is accidental or unintentional disclosure of any identifying data you provide. However, NASA has a number of policies and procedures to ensure that data are kept anonymous and protected. If you have any questions about this information collection, please contact: <Ms. Joni Baker, Title IX Coordinator>

INSTRUCTIONS: Please click on "Next" to continue. Choosing the "Save" button will save your responses should you need to revisit the survey at a later time to finish, but the "Save" button will not submit your survey responses. To submit your final survey responses, at the end of the survey choose the "Finish" button - you will not be able to return to the survey or change any responses after you select the "Finish" button. Once the survey is submitted, you will be directed to the Official NASA Website.

SURVEY ADMINISTRATION

SURVEY ADMINISTRATION:	NSSC, using Inquiste v9
ANNOUNCEMENT:	February 10, 2014
INVITATION:	February 12th (188 A&M Students)
REMINDERS:	February 18th & 24th
SURVEY CLOSES:	February 28th
RESPONSE RATE:	34% (51 surveys submitted, 12 surveys incomplete)

SURVEY CONTENT

REPORT CONTENT:	* 33 Survey Questions: Scale Ratings, Multiple Choice, and Comment
	Q1-6 Program Climate
	Q7-18 Gender Discrimination/Harassment
	Q19-24 Campus Safety
	Q25-33 General Background Questions

* COMMENTS

SURVEY IN A NUTSHELL

- * Overall, approximately two-thirds of students taking the survey reported a positive climate at A&M, reporting positive (Often, Very Often/Almost Always) support and interaction with faculty and fellow students. A lower percent of students reported receiving career encouragement from their mentor or TAs, or interacting with professors outside of class .

Female respondents were more likely than male to indicate the highest degree they expect to achieve is a master's degree, while males reported doctorate; Female respondents were also more likely to indicate that their comments or suggestions are taken seriously by male faculty members.

- * Overall, approximately three-quarters or more of respondents reported sexual discrimination or harassment behaviors as happening never or once or twice and only four percent of respondents identified behaviors as possibly sexual harassment. Incidents involved fellow students and few (n=3) involved faculty. Approximately half of respondents indicated they were comfortable reporting or acting on incidents of discrimination or harassment, and over half indicated they would report such an incident to a faculty member. One respondent indicated that they reported an incident of gender discrimination/sexual harassment and they were satisfied with the outcome.

Female respondents were less likely than male to report never hearing others refer to their gender in insulting or offensive terms; and less likely to report gender discrimination or sexual harassment.

- * Five percent or less of students indicated experiencing any of the uninvited behaviors queried in the survey, indicated the behaviors were by other students, and only one felt in danger of physical harm or sexual assault. Less than twenty percent of students reported some extent of concern for personal safety in dorms or sleeping areas, while approximately one-quarter indicated concern for off-campus, non-University sponsored events. All respondents indicated that physical safety is about the same or less of a problem since they entered the program.

Female respondents were less likely than male to report they were "not at all concerned" for their physical safety (indicating they may have some concern for safety) on campus grounds (not in dormitory/living/ sleeping area) or off-campus ground at dorms/housing or events.

- * Demographic data was reported by the 51 respondents who submitted completed surveys. Most of these respondents identified as White, not Hispanic or Latino, not married, less than 29 years of age, and over half were female.
 - * There were few comments on isolated incidents of offensive comments or behavior on or off campus; respondents did comment on general safety living in the Houston area, areas where individuals are drinking, evenings/late night near bar areas, or evenings late/night walking on campus alone.
-

SUMMARY SURVEY RESPONSES

(Percents are calculated from total of those surveyed (N=63; Demographics based on those responding N=51; Gender comparison percents are from those that responded to that question). Percents may not always add to 100% due to non-response to a particular question. Note: asterisk by gender table indicates statistically significant difference (Z-test) at $p < .05$

PROGRAM CLIMATE

1. For the following items, please select the choice that best reflects how often you have experienced the following activities or experiences associated with this program.

a. I work cooperatively with other students on course assignments.

			MALE		FEMALE	
{Choose one}						
38%	(n=24)	Very Often/Almost Always	50%	10	43%	13
27%	(n=17)	Often	30%	6	37%	11
13%	(n=8)	Occasionally	20%	4	13%	4
03%	(n=2)	Never	00%	0	07%	2

b. There is a level of competition among students in this class that makes me uncomfortable.

			MALE		FEMALE	
{Choose one}						
03%	(n=2)	Very Often/Almost Always	05%	1	03%	1
06%	(n=4)	Often	10%	2	07%	2
29%	(n=18)	Occasionally	20%	4	43%	13
43%	(n=27)	Never	65%	13	47%	14

c. I am encouraged to show how a particular course concept can be applied to an actual problem or situation.

			MALE		FEMALE	
{Choose one}						
19%	(n=12)	Very Often/Almost Always	10%	2	34%	10
40%	(n=25)	Often	60%	12	45%	13
19%	(n=12)	Occasionally	30%	6	17%	5
02%	(n=1)	Never	00%	0	03%	1

d. I discuss ideas with my classmates (either individuals or in a group).

			MALE		FEMALE	
{Choose one}						
32%	(n=20)	Very Often/Almost Always	40%	8	37%	11
32%	(n=20)	Often	45%	9	37%	11
16%	(n=10)	Occasionally	15%	3	23%	7
02%	(n=1)	Never	00%	0	03%	1

e. Instructors give me enough feedback on my work.

			MALE		FEMALE	
{Choose one}						
19%	(n=12)	Very Often/Almost Always	15%	3	30%	9
40%	(n=25)	Often	50%	10	47%	14
21%	(n=13)	Occasionally	35%	7	20%	6
02%	(n=1)	Never	00%	0	03%	1

1. For the following items, please select the choice that best reflects how often you have experienced the following activities or experiences associated with this program. (cont.)

f. Instructors treat all students with respect.

{Choose one}

41%	(n=26)	Very Often/Almost Always
32%	(n=20)	Often
08%	(n=5)	Occasionally
00%	(n=0)	Never

MALE		FEMALE	
40%	8	60%	18
55%	11	30%	9
05%	1	10%	3
00%	0	00%	0

g. Instructors treat female students in the same way as male students.

{Choose one}

57%	(n=36)	Very Often/Almost Always
21%	(n=13)	Often
03%	(n=2)	Occasionally
00%	(n=0)	Never

MALE		FEMALE	
70%	14	73%	22
30%	6	20%	6
00%	0	07%	2
00%	0	00%	0

h. I feel comfortable asking the instructors questions in their classes.

{Choose one}

35%	(n=22)	Very Often/Almost Always
32%	(n=20)	Often
08%	(n=5)	Occasionally
05%	(n=3)	Never

MALE		FEMALE	
60%	12	34%	10
25%	5	48%	14
10%	2	10%	3
05%	1	07%	2

i. I interact with instructors outside of class (e.g., office hours, email or discussion boards).

{Choose one}

16%	(n=10)	Very Often/Almost Always
30%	(n=19)	Often
29%	(n=18)	Occasionally
06%	(n=4)	Never

MALE		FEMALE	
15%	3	23%	7
40%	8	37%	11
35%	7	33%	10
10%	2	07%	2

j. I interact with other students in my program outside of class.

{Choose one}

30%	(n=19)	Very Often/Almost Always
33%	(n=21)	Often
14%	(n=9)	Occasionally
03%	(n=2)	Never

MALE		FEMALE	
25%	5	47%	14
55%	11	33%	10
15%	3	17%	5
05%	1	03%	1

k. Lab instructors treat female students in the same way as male students.

{Choose one}

65%	(n=41)	Very Often/Almost Always
13%	(n=8)	Often
00%	(n=0)	Occasionally
02%	(n=1)	Never

MALE		FEMALE	
75%	15	90%	26
25%	5	07%	2
00%	0	00%	0
00%	0	03%	1

1. For the following items, please select the choice that best reflects how often you have experienced the following activities or experiences associated with this program. (cont.)

l. I have sufficient access to lab equipment relative to other students in the lab.

{Choose one}

65% (n=41) Very Often/Almost Always
 13% (n=8) Often
 02% (n=1) Occasionally
 00% (n=0) Never

MALE		FEMALE	
80%	16	86%	25
15%	3	14%	4
05%	1	00%	0
00%	0	00%	0

m. Male and female students have equal access to lab equipment.

{Choose one}

73% (n=46) Very Often/Almost Always
 06% (n=4) Often
 00% (n=0) Occasionally
 00% (n=0) Never

MALE		FEMALE	
90%	18	97%	28
10%	2	03%	1
00%	0	00%	0
00%	0	00%	0

n. Lab responsibilities are shared equally among lab group members.

{Choose one}

59% (n=37) Very Often/Almost Always
 19% (n=12) Often
 00% (n=0) Occasionally
 02% (n=1) Never

MALE		FEMALE	
75%	15	76%	22
25%	5	21%	6
00%	0	00%	0
00%	0	03%	1

2. How frequently have each of the following persons encouraged you to continue in your major or increased your initial enthusiasm for your major?

a. Professors in my program

{Choose one}

35% (n=22) Very Often/Almost Always
 27% (n=17) Often
 14% (n=9) Occasionally
 03% (n=2) Never

MALE		FEMALE	
35%	7	50%	15
40%	8	30%	9
25%	5	13%	4
00%	0	07%	2

b. My fellow students

{Choose one}

32% (n=20) Very Often/Almost Always
 30% (n=19) Often
 17% (n=11) Occasionally
 00% (n=0) Never

MALE		FEMALE	
35%	7	43%	13
30%	6	43%	13
35%	7	13%	4
00%	0	00%	0

2. How frequently have each of the following persons encouraged you to continue in your major or increased your initial enthusiasm for your major? (cont.)

c. My teaching assistants (TAs)

{Choose one}

11%	(n=7)	Very Often/Almost Always
27%	(n=17)	Often
30%	(n=19)	Occasionally
11%	(n=7)	Never

MALE		FEMALE	
20%	4	10%	3
25%	5	40%	12
35%	7	40%	12
20%	4	10%	3

d. Members of my family

{Choose one}

48%	(n=30)	Very Often/Almost Always
21%	(n=13)	Often
10%	(n=6)	Occasionally
02%	(n=1)	Never

MALE		FEMALE	
60%	12	60%	18
15%	3	33%	10
20%	4	07%	2
05%	1	00%	0

e. A mentor (student or professional) assigned to me

{Choose one}

22%	(n=14)	Very Often/Almost Always
21%	(n=13)	Often
14%	(n=9)	Occasionally
19%	(n=12)	Never

MALE		FEMALE	
30%	6	29%	8
15%	3	36%	10
15%	3	21%	6
40%	8	14%	4

f. An informal mentor, not assigned to me

{Choose one}

30%	(n=19)	Very Often/Almost Always
17%	(n=11)	Often
21%	(n=13)	Occasionally
10%	(n=6)	Never

MALE		FEMALE	
26%	5	47%	14
11%	2	30%	9
42%	8	17%	5
21%	4	07%	2

g. Other

{Choose one}

22%	(n=14)	Very Often/Almost Always
14%	(n=9)	Often
16%	(n=10)	Occasionally
14%	(n=9)	Never

MALE		FEMALE	
31%	5	35%	9
13%	2	27%	7
31%	5	19%	5
25%	4	19%	5

3. For the following items, please select the choice that best indicates the extent (if any) to which you may have changed in any of the areas as a result of being in this program:

a. My confidence that this major was the right choice for me has...

{Choose one}

- 19% (n=12) Increased Greatly
- 30% (n=19) Increased Somewhat
- 16% (n=10) Not Changed
- 11% (n=7) Decreased Somewhat
- 03% (n=2) Decreased Greatly

MALE		FEMALE	
20%	4	27%	8
45%	9	33%	10
15%	3	23%	7
15%	3	13%	4
05%	1	03%	1

b. The likelihood I will continue in this program has...

{Choose one}

- 29% (n=18) Increased Greatly
- 19% (n=12) Increased Somewhat
- 22% (n=14) Not Changed
- 05% (n=3) Decreased Somewhat
- 05% (n=3) Decreased Greatly

MALE		FEMALE	
30%	6	40%	12
25%	5	23%	7
35%	7	23%	7
05%	1	07%	2
05%	1	07%	2

4. What is the highest degree you expect to earn in your lifetime?

{Choose one}

- 11% (n=7) Bachelor's
- 25% (n=16) Master's
- 41% (n=26) Doctorate

MALE		FEMALE	
15%	3	14%	4
15%	3	45%	13
70%	14	41%	12

5. For each category of individuals (e.g. students, instructors) choose the number from the scale that best represents the quality of your relationships with those persons at your campus.

5 = Friendly, available - I have a sense of belonging

1 = Unfriendly, unavailable - I have sense of not belonging.

a. Male students in my department

{Choose one}

- 38% (n=24) 5
- 35% (n=22) 4
- 03% (n=2) 3
- 03% (n=2) 2
- 02% (n=1) 1

MALE		FEMALE	
38%	8	53%	16
52%	11	37%	11
05%	1	03%	1
00%	0	07%	2
05%	1	00%	0

b. Female students in my department

{Choose one}

- 37% (n=23) 5
- 37% (n=23) 4
- 03% (n=2) 3
- 02% (n=1) 2
- 03% (n=2) 1

MALE		FEMALE	
38%	8	50%	15
52%	11	40%	12
05%	1	03%	1
00%	0	03%	1
05%	1	03%	1

5. For each category of individuals (e.g. students, instructors) choose the number from the scale that best represents the quality of your relationships with those persons at your campus. (cont.)

c. Male faculty in my department

{Choose one}

- 30% (n=19) 5
- 32% (n=20) 4
- 14% (n=9) 3
- 03% (n=2) 2
- 02% (n=1) 1

MALE		FEMALE	
33%	7	40%	12
43%	9	37%	11
19%	4	17%	5
05%	1	03%	1
00%	0	03%	1

d. Female faculty in my department

{Choose one}

- 33% (n=21) 5
- 33% (n=21) 4
- 13% (n=8) 3
- 02% (n=1) 2
- 00% (n=0) 1

MALE		FEMALE	
33%	7	47%	14
57%	12	30%	9
10%	2	20%	6
00%	0	03%	1
00%	0	00%	0

6. In your department, to what extent do you feel that your suggestions or comments in the classroom are taken seriously by:

a. Male Faculty Members

{Choose one}

- 44% (n=28) Often
- 22% (n=14) Sometimes
- 00% (n=0) Once or Twice
- 05% (n=3) Never

MALE		FEMALE	
38%	8	67%	20
43%	9	17%	5
00%	0	00%	0
05%	1	07%	2

b. Female Faculty Members

{Choose one}

- 41% (n=26) Often
- 24% (n=15) Sometimes
- 02% (n=1) Once or Twice
- 03% (n=2) Never

MALE		FEMALE	
38%	8	60%	18
43%	9	20%	6
05%	1	00%	0
00%	0	07%	2

c. Male Student Peers

{Choose one}

- 41% (n=26) Often
- 19% (n=12) Sometimes
- 06% (n=4) Once or Twice
- 02% (n=1) Never

MALE		FEMALE	
38%	8	60%	18
33%	7	17%	5
00%	0	13%	4
05%	1	00%	0

6. In your department, to what extent do you feel that your suggestions or comments in the classroom are taken seriously by: (cont.)

d. Female Student Peers

{Choose one}

43% (n=27) Often
 17% (n=11) Sometimes
 08% (n=5) Once or Twice
 00% (n=0) Never

MALE		FEMALE	
38%	8	63%	19
33%	7	13%	4
05%	1	13%	4
00%	0	00%	0

GENDER DISCRIMINATION/HARASSMENT

In this question you are asked about sex/gender related talk and/or behavior that was unwanted, uninvited, and in which you did not participate willingly.

7. How often while in your current program have you been in situations involving individuals in your Academic program, where one or more of these individuals (of either gender)... Mark one answer in each row.

a. Repeatedly told sexual stories or jokes that were offensive to you?

{Choose one}

63% (n=40) Never
 14% (n=9) Once or twice
 02% (n=1) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
90%	18	73%	22
10%	2	23%	7
00%	0	03%	1
00%	0	00%	0
00%	0	00%	0

b. Referred to people of your gender in insulting or offensive terms? (e.g., demeaning, not suited for type of work, etc.)

{Choose one}

62% (n=39) Never
 13% (n=8) Once or twice
 03% (n=2) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
95%	19	69%	20 *
05%	1	24%	7
00%	0	07%	2
00%	0	00%	0
00%	0	00%	0

c. Treated you "differently" because of your gender (e.g., mistreated, slighted, excluded, condescending, or ignored you)?

{Choose one}

70% (n=44) Never
 06% (n=4) Once or twice
 02% (n=1) Sometimes
 02% (n=1) Often
 00% (n=0) Very often

MALE		FEMALE	
95%	19	83%	25
05%	1	10%	3
00%	0	03%	1
00%	0	03%	1
00%	0	00%	0

7. How often while in your current program have you been in situations involving individuals in your Academic program, where one or more of these individuals (of either gender)... (cont.)

d. Made offensive or inappropriate remarks about your appearance, body, or sexual activities?

{Choose one}

75% (n=47) Never
 05% (n=3) Once or twice
 00% (n=0) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
100%	20	90%	27
00%	0	10%	3
00%	0	00%	0
00%	0	00%	0
00%	0	00%	0

e. Made gestures or used body language of a sexual nature that embarrassed or offended you?

{Choose one}

75% (n=47) Never
 05% (n=3) Once or twice
 00% (n=0) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
100%	20	90%	27
00%	0	10%	3
00%	0	00%	0
00%	0	00%	0
00%	0	00%	0

f. Physically threatened or intimidated you because of your gender?

{Choose one}

75% (n=47) Never
 05% (n=3) Once or twice
 00% (n=0) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
100%	20	90%	27
00%	0	10%	3
00%	0	00%	0
00%	0	00%	0
00%	0	00%	0

g. Made unwanted attempts to establish a romantic sexual relationship with you despite your efforts to discourage it?

{Choose one}

75% (n=47) Never
 02% (n=1) Once or twice
 03% (n=2) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
100%	20	90%	27
00%	0	03%	1
00%	0	07%	2
00%	0	00%	0
00%	0	00%	0

h. Made you feel threatened with some sort of retaliation for not being sexually cooperative?

{Choose one}

76% (n=48) Never
 02% (n=1) Once or twice
 02% (n=1) Sometimes
 00% (n=0) Often
 00% (n=0) Very often

MALE		FEMALE	
100%	20	93%	28
00%	0	03%	1
00%	0	03%	1
00%	0	00%	0
00%	0	00%	0

7. How often while in your current program have you been in situations involving individuals in your Academic program, where one or more of these individuals (of either gender)... Mark one answer in each row. (cont.)

i. Touched you in a way that made you feel uncomfortable?

			MALE		FEMALE	
{Choose one}						
76%	(n=48)	Never	100%	20	93%	28
02%	(n=0)	Once or twice	00%	0	00%	0
00%	(n=1)	Sometimes	00%	0	03%	1
00%	(n=0)	Often	00%	0	00%	0
00%	(n=0)	Very often	00%	0	00%	0

j. Intentionally cornered you or leaned over you in a sexual way?

			MALE		FEMALE	
{Choose one}						
76%	(n=48)	Never	100%	20	93%	28
03%	(n=2)	Once or twice	00%	0	07%	2
00%	(n=0)	Sometimes	00%	0	00%	0
00%	(n=0)	Often	00%	0	00%	0
00%	(n=0)	Very often	00%	0	00%	0

k. Implied better academic opportunity or better treatment if you were sexually cooperative?

			MALE		FEMALE	
{Choose one}						
78%	(n=49)	Never	100%	20	97%	29
02%	(n=1)	Once or twice	00%	0	03%	1
00%	(n=0)	Sometimes	00%	0	00%	0
00%	(n=0)	Often	00%	0	00%	0
00%	(n=0)	Very often	00%	0	00%	0

l. Attempted to have sex with you without your consent or against your will?

			MALE		FEMALE	
{Choose one}						
78%	(n=49)	Never	100%	20	97%	29
02%	(n=1)	Once or twice	00%	0	03%	1
00%	(n=0)	Sometimes	00%	0	00%	0
00%	(n=0)	Often	00%	0	00%	0
00%	(n=0)	Very often	00%	0	00%	0

m. Other unwanted gender-related behavior?

			MALE		FEMALE	
{Choose one}						
78%	(n=49)	Never	100%	20	97%	29
02%	(n=1)	Once or twice	00%	0	03%	1
00%	(n=0)	Sometimes	00%	0	00%	0
00%	(n=0)	Often	00%	0	00%	0
00%	(n=0)	Very often	00%	0	00%	0

Please identify and explain "Other unwanted gender-related behavior".

[SEE COMMENTS]

8. How many of the behaviors listed in the previous question, that you marked as happening to you, do you consider to have been sexual harassment?

{Choose one}

- 56% (n=35) Does not apply, I
- 00% (n=0) Some were sexual harassment
- 05% (n=3) Some were sexual harassment, some were not sexual harassment
- 21% (n=13) None were sexual harassment

MALE		FEMALE	
86%	18	57%	17
00%	0	00%	0
00%	0	10%	3
14%	3	33%	10

9. Which of the following individuals were involved in the behaviors you reported experiencing?

{Choose one}

- 05% (n=3) Some involved faculty members
- 14% (n=9) Some involved fellow
- 00% (n=0) Some involved campus staff
- 06% (n=4) Choose not to reply
- 03% (n=2) Other <please specify>

MALE		FEMALE	
00%	0	10%	3
10%	2	23%	7
00%	0	00%	0
00%	0	13%	4
05%	1	03%	1

10. To what extent would you feel comfortable ...

a. Reporting gender discrimination?

{Choose one}

- 17% (n=11) Very large extent
- 24% (n=15) Large extent
- 22% (n=14) Moderate extent
- 11% (n=7) Small extent
- 02% (n=1) Not at all

MALE		FEMALE	
38%	8	11%	3
24%	5	37%	10
14%	3	41%	11
24%	5	07%	2
00%	0	04%	1

b. Reporting sexual harassment?

{Choose one}

- 29% (n=18) Very large extent
- 27% (n=17) Large extent
- 10% (n=6) Moderate extent
- 10% (n=6) Small extent
- 02% (n=1) Not at all

MALE		FEMALE	
52%	11	26%	7
19%	4	48%	13
10%	2	15%	4
19%	4	07%	2
00%	0	04%	1

c. Stepping in to stop a situation of gender discrimination?

{Choose one}

- 19% (n=12) Very large extent
- 19% (n=12) Large extent
- 27% (n=17) Moderate extent
- 10% (n=6) Small extent
- 02% (n=1) Not at all

MALE		FEMALE	
33%	7	19%	5
24%	5	26%	7
24%	5	44%	12
19%	4	07%	2
00%	0	04%	1

10. To what extent would you feel comfortable. (cont.)

d. Stepping in to stop a situation of sexual harassment?

{Choose one}

25%	(n=16)	Very large extent
24%	(n=15)	Large extent
14%	(n=9)	Moderate extent
13%	(n=8)	Small extent
00%	(n=0)	Not at all

MALE		FEMALE	
43%	9	26%	7
24%	5	37%	10
19%	4	19%	5
14%	3	19%	5
00%	0	00%	0

e. Pointing out to someone that they have "crossed the line" with gender-related comments behavior.

{Choose one}

29%	(n=18)	Very large extent
16%	(n=10)	Large extent
16%	(n=10)	Moderate extent
14%	(n=9)	Small extent
02%	(n=1)	Not at all

MALE		FEMALE	
52%	11	26%	7
14%	3	26%	7
19%	4	22%	6
14%	3	22%	6
00%	0	04%	1

11. If you experienced/witnessed gender discrimination/sexual harassment in your program, how would you react?

{Choose one}

06%	(n=4)	I would not interfere with or report the situation
32%	(n=20)	I would directly confront the individual
22%	(n=14)	I would wait and confront the
46%	(n=29)	I would report the behavior to a responsible official
05%	(n=3)	Other

MALE		FEMALE	
10%	2	07%	2
52%	11	30%	9
24%	5	30%	9
67%	14	50%	15
05%	1	07%	2

12. If you decided to report a gender discrimination/sexual harassment incident, who would you report the incident to?

{Choose all that apply}

57%	(n=36)	Faculty member
30%	(n=19)	Campus Security
22%	(n=14)	Campus Staff
08%	(n=5)	Teacher Assistant (TA)
27%	(n=17)	Student Affairs
33%	(n=21)	EO Office (Title IX Coordinator, Discrimination Complaints Mgr., etc.)
11%	(n=7)	Ombudsman (University Mediator,
02%	(n=1)	Other <please specify>

MALE		FEMALE	
67%	14	73%	22
33%	7	40%	12
38%	8	20%	6
10%	2	10%	3
52%	11	20%	6
57%	12	30%	9
14%	3	13%	4
05%	1	00%	0

13. Have you reported any incidents of gender discrimination/sexual harassment while attending

{Choose one}

02%	(n=1)	Yes
79%	(n=50)	No <Skip to Q17>

MALE		FEMALE	
00%	0	03%	1
100%	21	97%	29

14. Who did you report the incident to? {Choose all that apply}

- 100% (n=1) Faculty member
- 00% (n=0) Campus Security
- 00% (n=0) Campus Staff
- 00% (n=0) Teacher Assistant (TA)
- 00% (n=0) Student Affairs
- 00% (n=0) EO Office (Title IX Coordinator, Discrimination Complaints Mgr., etc.)
- 00% (n=0) Ombudsman (University Mediator,
- 00% (n=0) Other <please specify>

15. How satisfied were you with the outcome of your report? {Choose one}

- 00% (n=0) Very Satisfied
- 100% (n=1) Satisfied
- 00% (n=0) Neither satisfied nor dissatisfied
- 00% (n=0) Dissatisfied
- 00% (n=0) Very dissatisfied

16. Please provide any comments on your reporting process and outcome.

[SEE COMMENTS]

17. What are your reasons for not reporting an incident of gender discrimination or sexual harassment?

{Choose all that apply}

		MALE		FEMALE	
68%	(n=43)	100%	21	73%	22
10%	(n=6)	05%	1	17%	5
06%	(n=4)	05%	1	10%	3
08%	(n=5)	10%	2	10%	3
06%	(n=4)	00%	0	13%	4
03%	(n=2)	00%	0	07%	2
00%	(n=0)	00%	0	00%	0
03%	(n=2)	00%	0	07%	2
02%	(n=1)	00%	0	03%	1
02%	(n=1)	00%	0	03%	1
05%	(n=3)	05%	1	07%	2
05%	(n=3)	05%	1	07%	2
02%	(n=1)	00%	0	03%	1
00%	(n=0)	00%	0	00%	0
00%	(n=0)	00%	0	00%	0
05%	(n=3)	00%	0	10%	3
03%	(n=2)	00%	0	07%	2

18. In your opinion, has sexual harassment become more or less of a problem in your program

{Choose one}

- 32% (n=20) Less of a problem
- 44% (n=28) About the same
- 00% (n=0) More of a problem

MALE		FEMALE	
35%	7	46%	13
65%	13	54%	15
00%	0	00%	0

CAMPUS SAFETY

19. Since you started this program, has someone in your program, including students, staff, or faculty, engaged in the following unwanted and uninvited behaviors?

a. Followed or spied on you in public areas (e.g., in the library or while off Academy grounds)

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 02% (n=1) Yes, but I did not feel in danger of physical harm or sexual assault
- 79% (n=50) No

MALE		FEMALE	
00%	0	00%	0
00%	0	03%	1
100%	21	97%	29

b. Spied on you in private areas (e.g., watched you while you were changing clothes or showering)

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 00% (n=0) Yes, but I did not feel in danger of physical harm or sexual assault
- 81% (n=51) No

MALE		FEMALE	
00%	0	00%	0
00%	0	00%	0
100%	21	100%	30

c. Showed up at places where you were even though he/she had no reason

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 02% (n=1) Yes, but I did not feel in danger of physical harm or sexual assault
- 79% (n=50) No

MALE		FEMALE	
00%	0	00%	0
00%	0	03%	1
100%	21	97%	29

d. Left unwanted items for you to find (e.g., gifts or other items)

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 00% (n=0) Yes, but I did not feel in danger of physical harm or sexual assault
- 81% (n=51) No

MALE		FEMALE	
00%	0	00%	0
00%	0	00%	0
100%	21	100%	30

CAMPUS SAFETY (cont.)

e. Stood outside or hung around your dorm room or classroom even though he/she had no reason to be there

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 03% (n=2) Yes, but I did not feel in danger of physical harm or sexual assault
- 00% (n=0) No

MALE		FEMALE	
00%	0	00%	0
00%	0	07%	2
100%	21	93%	28

f. Vandalized or tampered with your belongings

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 00% (n=0) Yes, but I did not feel in danger of physical harm or sexual assault
- 81% (n=51) No

MALE		FEMALE	
00%	0	00%	0
00%	0	00%	0
100%	21	100%	30

g. Took personal items that belonged to you

{Choose one}

- 00% (n=0) Yes, and I felt in danger of physical harm or sexual assault
- 05% (n=3) Yes, but I did not feel in danger of physical harm or sexual assault
- 76% (n=48) No

MALE		FEMALE	
00%	0	00%	0
05%	1	07%	2
95%	20	93%	28

h. Took your picture or videotaped you without your consent

{Choose one}

- 02% (n=1) Yes, and I felt in danger of physical harm or sexual assault
- 00% (n=0) Yes, but I did not feel in danger of physical harm or sexual assault
- 78% (n=49) No

MALE		FEMALE	
00%	0	03%	1
00%	0	00%	0
100%	21	97%	28

i. Sent you unsolicited personal messages (e.g., e-mails, instant messages, sexting, notes, or letters)

{Choose one}

- 02% (n=1) Yes, and I felt in danger of physical harm or sexual assault
- 06% (n=4) Yes, but I did not feel in danger of physical harm or sexual assault
- 73% (n=46) No

MALE		FEMALE	
00%	0	03%	1
05%	1	10%	3
95%	20	87%	26

CAMPUS SAFETY (cont.)

j. Posted on Facebook, Twitter, and/or other social media

{Choose one}

02%	(n=1)	Yes, and I felt in danger of physical harm or sexual assault
05%	(n=3)	Yes, but I did not feel in danger of physical harm or sexual assault
73%	(n=46)	No

MALE		FEMALE	
00%	0	03%	1
00%	0	10%	3
100%	21	86%	25

k. Made unsolicited personal phone calls to you

{Choose one}

02%	(n=1)	Yes, and I felt in danger of physical harm or sexual assault
00%	(n=0)	Yes, but I did not feel in danger of physical harm or sexual assault
79%	(n=50)	No

MALE		FEMALE	
00%	0	03%	1
00%	0	00%	0
100%	21	97%	29

l. Other

{Choose one}

00%	(n=0)	Yes, and I felt in danger of physical harm or sexual assault
00%	(n=0)	Yes, but I did not feel in danger of physical harm or sexual assault
71%	(n=45)	No

MALE		FEMALE	
00%	0	03%	1
00%	0	00%	0
100%	18	100%	27

Please identify and explain "Other".

20. Which of the following individuals were involved in the behaviors you reported?

{Choose one}

70%	(n=44)	Does not apply, I marked "No" for all
00%	(n=0)	Some involved faculty members.
08%	(n=5)	Some involved fellow students in my program.
00%	(n=0)	Some involved campus staff.

MALE		FEMALE	
90%	19	83%	25
00%	0	00%	0
05%	1	13%	4
00%	0	00%	0

21. To what extent are you concerned about your physical safety in the following locations?

a. On campus grounds, in dormitory/living and sleeping area

{Choose one}

02%	(n=1)	Very large extent
02%	(n=1)	Large extent
03%	(n=2)	Moderate extent
13%	(n=8)	Small extent
35%	(n=22)	Not at all

MALE		FEMALE	
00%	0	03%	1
05%	1	00%	0
00%	0	07%	2
05%	1	23%	7
48%	10	40%	12

21. To what extent are you concerned about your physical safety in the following locations? (cont.)

b. On campus grounds, not in dormitory/living and sleeping area

{Choose one}

- 02% (n=1) Very large extent
- 02% (n=1) Large extent
- 06% (n=4) Moderate extent
- 25% (n=16) Small extent
- 43% (n=27) Not at all

MALE		FEMALE	
00%	0	03%	1
05%	1	00%	0
00%	0	13%	4
05%	1	50%	15 *
86%	18	30%	9 *

c. Off campus grounds, at off-campus dormitory/housing/living location

{Choose one}

- 03% (n=2) Very large extent
- 03% (n=2) Large extent
- 10% (n=6) Moderate extent
- 17% (n=11) Small extent
- 44% (n=28) Not at all

MALE		FEMALE	
00%	0	07%	2
05%	1	03%	1
00%	0	20%	6 *
14%	3	27%	8
76%	16	40%	12 *

d. Off campus grounds, at a University-sponsored event

{Choose one}

- 02% (n=1) Very large extent
- 02% (n=1) Large extent
- 05% (n=3) Moderate extent
- 13% (n=8) Small extent
- 52% (n=33) Not at all

MALE		FEMALE	
00%	0	03%	1
05%	1	00%	0
00%	0	10%	3
00%	0	27%	8 *
81%	17	53%	16 *

e. Off campus grounds, not at a University-sponsored event

{Choose one}

- 03% (n=2) Very large extent
- 08% (n=5) Large extent
- 10% (n=6) Moderate extent
- 19% (n=12) Small extent
- 40% (n=25) Not at all

MALE		FEMALE	
00%	0	07%	2
05%	1	13%	4
05%	1	17%	5
19%	4	27%	8
67%	14	37%	11 *

22. In your opinion, has physical safety become more or less of a problem on campus since you entered this program?

{Choose one}

- 21% (n=13) a. Less of a problem
- 60% (n=38) b. About the same
- 00% (n=0) c. More of a problem

MALE		FEMALE	
29%	6	23%	7
71%	15	77%	23
00%	0	00%	0

23. Please provide further detail on any situation or location on or near campus grounds where you [SEE COMMENTS]

24. Please share any further comments you may have on your social or academic experiences [SEE COMMENTS]

GENERAL BACKGROUND

The following section asks questions on demographic information such as marital status, gender,

25. What is your current marital status?

{Choose one}

10%	(n=5)	Married and living with spouse
02%	(n=1)	Married and not living with spouse
00%	(n=0)	Legally separated
00%	(n=0)	Divorced
00%	(n=0)	Widowed
18%	(n=9)	Not married-living with significant other
71%	(n=36)	Not married

GENERAL BACKGROUND (cont.)

26. Do you have any children under the age of 18?

{Choose all that apply}

100%	(n=51)	No
00%	(n=0)	Yes

27. Have you ever requested family leave?

{Choose one}

00%	(n=0)	Yes, and it was granted.
00%	(n=0)	Yes, and it was not granted.
00%	(n=0)	No, I did not make a request for family leave even though I needed to.
100%	(n=51)	No, I never made a request and have

If you requested family leave and it was not granted, or did not feel comfortable applying for family leave when you actually needed it, please provide further detail:

28. Gender:

{Choose one}

41%	(n=21)	Male
59%	(n=30)	Female

29. Age: <enter actual age>

{Enter text answer}

08%	(n=4)	<20
65%	(n=33)	20-24
22%	(n=11)	25-29
02%	(n=1)	30-34
03%	(n=2)	35+

30. Ethnicity:

{Choose one}

08%	(n=4)	Hispanic, Latino, Spanish Origin
92%	(n=47)	Not Hispanic, Latino, Spanish Origin

31. Race: <select all that apply>

{Choose all that apply}

78%	(n=40)	White
04%	(n=2)	Black/African American
14%	(n=7)	Asian
00%	(n=0)	Native HI/Pacific Islander
00%	(n=0)	American Indian/Alaska Native
02%	(n=1)	Other <please specify> (=Hispanic)

GENERAL BACKGROUND (cont.)

32. Current Status:

{Choose one}

47%	(n=24)	Undergraduate
27%	(n=14)	Graduate - Master's
22%	(n=11)	Graduate - Doctoral
02%	(n=1)	Research Fellow
02%	(n=1)	Other <please specify> (=Post Baccalaureate)

33. Academic Major:

{Enter text answer}

49%	(n=25)	Atmospheric Science
47%	(n=24)	Meteorology

34. Survey Completion Status (38% Response Rate):

19%	(n=12)	In progress
81%	(n=51)	Completed

NASA Title IX External Compliance Survey: COMMENTS

7. How often while in your current program have you been in situations involving individuals in

- 1 Spoke of other female students inappropriately

9. Which of the following individuals were involved in the behaviors you reported

- 1 Another student not in my program, but the situation occurred on campus

11. If you experienced/witnessed gender discrimination/sexual harassment in your program,

- 1 a combination of B and D depending on how well I knew the individual(s)
I would talk to the victim to see how they perceived the situation and offer my view and
- 2 help with reporting or changing things.
- 3 Would first seek advise from advisor or staff

12. If you decided to report a gender discrimination/sexual harassment incident, who would

- 1 Dean of Student Life, Dean of Faculties

16. Please provide any comments on your reporting process and outcome

- I wasn't sure how to take a comment that was directed to me from a male faculty member. I thought the comment was ironically hilarious, but my fellow students thought
- 1 it was offensive. So, I talked to my advisor about the situation, since she knows the male faculty member better than I do. I was satisfied with the comments and suggestions she provided, and I decided to not dwell on the matter any further.

17. What are your reasons for not reporting an incident of gender discrimination or sexual

- 1 I didn't know the offender so I didn't think the police would be able to find him to do anything
- 2 I didn't want to step in and be involved with someone else's problem unless they wanted me to.

19. Please identify and explain "Other".

- 1 Comment on "g" - This was about 10 years ago when the building was less secured than now.

23. Please provide further detail on any situation or location on or near campus grounds where

- A few weeks ago, the weather conditions resulted in icy roads that caused several
- 1 accidents for students/staff that were driving to campus. I believe morning classes should have been delayed until roads were safe to travel on.
 - 2 Anywhere people are drinking
 - 3 evenings/ late night near bar areas
 - 4 I am always slightly concerned because I lived in the Houston area and you always have to watch what you're doing to be safe.
 - 5 I feel safe anywhere on campus at any time of day.

- 6 I'm just slightly paranoid because of stories I have heard of things happening on campus.
- 7 The distance from dorms to the REC center is far away. At times in the evening, I am more concerned for my safety and walk cautiously to my room.
- 8 Walking on campus alone at night
We receive the occasional emailed police report or Code Maroon (the university emergency contact system) when some dangerous event happens, so we are aware that
- 9 dangerous situations can occur in the area. However, I have yet to experience a situation where I felt concerned for my physical safety.

24. Please share any further comments you may have on your social or academic experiences

- 1 Basically, I haven't faced any gender discrimination, sexual harassment, or physical safety since I attended this program.
General comment: I am a researcher, not a student, so some responses may seem
- 2 inconsistent, and I left the first several pages blank because the questions apply only to students.
- 3 I have never been discriminated against or sexually harassed, nor have I witnessed anyone else in those circumstances.