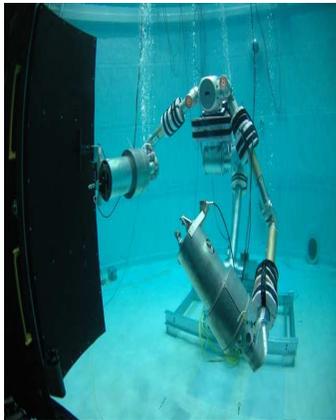




TITLE IX COMPLIANCE REVIEW REPORT



UNIVERSITY OF MARYLAND AEROSPACE ENGINEERING DEPARTMENT

Office of Diversity and Equal Opportunity
April 2007

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I. INTRODUCTION

NASA conducted its compliance review of the University of Maryland Aerospace Engineering Department as part of its effort to ensure that individuals have equal opportunities, without regard to sex, to pursue, participate in, and benefit from academic, extracurricular, research, occupational training, and other educational activities. The review was conducted under NASA's policy to ensure that educational programs the agency assists financially provide equal opportunity regardless of sex.¹ This policy is based on Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex in educational programs and activities receiving federal financial assistance.²

A. Background

1. *Title IX Regulations and Other Relevant Law*

The NASA Title IX regulations provide for periodic reviews of NASA grant recipients.³ NASA issued its Title IX regulations in August 2000 as part of a Common Rule with 23 other Federal Agencies.⁴ The Common Rule established Title IX regulations for each of the agencies, including specific requirements for compliance with Title IX. These requirements included the appointment of a Title IX Coordinator, the issuance and appropriate dissemination of Title IX policy and grievance procedures, and a Title IX self-evaluation. In addition, the NASA Authorization Act of 2005 requires that NASA conduct at least two Title IX compliance reviews annually.⁵

2. *Government Accountability Office Report on Title IX Compliance Activities Regarding STEM Fields*

NASA's Title IX compliance program received further impetus with the July 2004 recommendation of the Government Accountability Office (GAO) to conduct onsite compliance reviews.⁶ Beginning in late 2004, NASA participated as a member in an Interagency Task Force on conducting Title IX compliance reviews of Agency grant recipients, growing out of recommendations from the GAO report.⁷

¹ See 65 Fed. Reg. 52859, Aug. 30, 2000; see also NASA Policy Directive 2081.1, Subject: Nondiscrimination In Federally Assisted and Federally Conducted Programs of NASA - Delegation of Authority.

² 20 U.S.C. §§ 1681-1688, as amended.

³ 14 C.F.R. § 1253.605, Enforcement Procedures, incorporating compliance requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d).

⁴ 65 Fed. Reg. 52865, Aug. 30, 2000.

⁵ 42 U.S.C. § 16798(b).

⁶ 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) (hereafter cited as the 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).

⁷ The Task Force included the other Agencies reviewed by GAO on Title IX compliance: the Departments of Education and Energy and the National Science Foundation. The group was led by the Department of Justice, Civil Rights Division, Coordination and Review Section.

B. Objectives and Scope

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

- To evaluate the University of Maryland Aerospace Engineering Department's compliance with NASA Title IX regulations, specifically regarding the Title IX Coordinator's functioning and responsibilities; Title IX policy and dissemination; Title IX grievance procedures and the effectiveness of their implementation; self-evaluation efforts; admission, enrollment, and retention; recruitment and outreach practices; faculty advising/career counseling, research participation, classroom experiences, and policy relating to parental/marital status ("family friendly" policies), safety and sexual harassment.
- To report on promising practices of the University of Maryland Aerospace Engineering Department in promoting gender equity and increasing the number of women participating in its aerospace engineering program, 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 increase the number of women participating in the University's aerospace engineering program.

The compliance review was limited in scope to the University of Maryland's Aerospace Engineering (AE) Department including both the undergraduate and graduate programs. Furthermore, the compliance review did not cover Subpart E, Discrimination on the Basis of Sex in Employment in Education Programs or Activities Prohibited, of NASA's Title IX regulations at 14 C.F.R. Part 1253.

C. Methodology

1. Compliance Review Plan

The Compliance Review Plan (CRP) identified two main focal points for compliance assessment: procedural compliance requirements and program administration. The main areas of inquiry, and sub-issues within each were:

- Title IX Procedural Compliance Requirements
 - Coordinator
 - Policy/Dissemination
 - Grievance Procedures
 - Self-Evaluation
- Program Administration
 - Admissions, Recruitment, Outreach, and Retention
 - Faculty Advising/Career Counseling
 - Research Participation/Classroom Experience (e.g., laboratory environment, access to lab space/equipment, classroom team assignments)

- Parental/Marital Status (“Family Friendly” Policies)
- Safety Policies
- Sexual Harassment Policies

The CRP also identified the methods by which needed information would be gathered for each of the substantive areas. These methods included three information requests for statistical data, and relevant policies and procedures, and an on-site visit to the University to interview University officials, AE Department administration, faculty and staff; and undergraduate and graduate AE students. The information requests and interview guides focused on specific inquiries needed to determine whether the University was effectively meeting Title IX compliance requirements and whether its outreach efforts and other promising practices were successful in achieving their purposes.

2. *Literature Review*

NASA conducted a review of literature regarding women in science and engineering (S&E) studies, including Title IX policy and enforcement in the S&E context.⁸ NASA relied primarily on a recent report of the National Academy of Sciences, National Research Council entitled, *To Recruit and Advance: Women Students and Faculty in Science and Engineering* (hereafter cited as NRC Report). The NRC Report, issued in November 2006, was based on a comprehensive literature review and site visits to four universities “recognized for successfully advancing and retaining women students, faculty or leaders.”⁹ The report provided a valuable tool for better understanding women’s experiences in S&E studies and helped to guide NASA’s assessment of the AE Dept.’s promising practices regarding recruitment and advancement of women students.¹⁰

For example, the report identified the need for creating and institutionalizing a sustained commitment to diversity among university leaders and administrators.¹¹ 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 website, which can help to show that the program is welcoming and inclusive of women.¹² Another key strategy is extending outreach to potential students at the

⁸ See generally National Academy of Sciences, National Research Council, *To Recruit and Advance: Women Students and Faculty in Science and Engineering* (2006); 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); 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); 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); 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).

⁹ NRC Report, Summary, p.2.

¹⁰ NRC stated that it “sought to move beyond yet another catalogue of challenges facing the advancement of women academic in S&E to provide a document describing actions actually taken by universities to improve the situation for women.” *Ibid.*, Preface, p. vii.

¹¹ *Ibid.*, chap. 1, p.8.

¹² *Ibid.*, chap. 2, p.47.

K-12 and undergraduate levels in the form of summer science and engineering camps, lecture series, career days, and mentoring programs.¹³

The NRC Report indicated that specific retention tools such as curricular modifications and “family friendly” policies may also be of assistance in increasing the numbers of women in S&E 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.¹⁴

The importance of “family friendly” policies is indicated in part by differences in male and female socio-economic factors that may play a role in the attrition of women students. For example, women make up 60 percent of students in the lowest 25 percent income level, 62 percent of students age 40 or older, 62 percent of students with children or dependants, and 69 percent of students who are single parents.¹⁵ All of these characteristics are associated with lower rates of persistence and completion in postsecondary education. Women, in particular, who are often primary caregivers at this stage of their education, are beginning to face the work-family conflict so often described in the context of professional women.¹⁶

Another important tool for S&E departments is training efforts to raise awareness among faculty and students on gender issues such as sexual harassment prevention.¹⁷ There also is a need to raise awareness regarding differences between men’s and women’s experiences in faculty-student interactions. For example, in a study of 3,300 S&E graduate students conducted in 1993-1994, women were less likely than men to report being taken seriously and respected by faculty.¹⁸ The study also found that men were more likely to receive faculty assistance in learning to design research, co-authoring publications, and writing grant proposals. Finally, women were more likely than men to report that their relationship with their advisor was one of “student-faculty” rather than “mentor-mentee” or “colleagues.” Possible strategies for addressing these challenges included providing students with more than one advisor, encouraging students to seek out informal faculty advisors, making it easy for students to switch advisors, and establishing strong mentoring programs.¹⁹

Finally, the NRC report described issues that “may not be anticipated” influencing the working environment of the laboratory.²⁰ For example, personal safety issues may be different for women working alone at night in a lab. One faculty member interviewed by NRC commented

¹³ Ibid.

¹⁴ 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).

¹⁵ Ibid., p. 51 (citing Berkner, L., S. He, and E. F. Cataldi, “Descriptive Summary of 1995–96, Beginning Postsecondary Students: Six Years Later” (NCES 2003–151). National Center for Education Statistics, U.S. Department of Education. (Washington, D.C.: Government Printing Office).

¹⁶ Ibid., chap. 1, p. 27.

¹⁷ Ibid., chap. 4, p. 78.

¹⁸ Ibid., chap. 3, pp. 53-54 (citing Fox, M. F., “Women, science, and academia: Graduate education and careers.” *Gender and Society* 15(5):654–666 (2001)).

¹⁹ Ibid., pp. 57-58, 65.

²⁰ Ibid., chap. 2, p. 41.

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. Similarly, safety issues also are a factor in housing arrangements for women; on-campus housing may be more important for women who may want to limit the distance to and from the lab at odd hours.²¹

NASA notes that the University of Maryland AE Department is engaging in many of the programs and practices identified in the research literature for recruitment and retention of women in S&E fields (see “Promising Practices,” below).

3. *On-site Compliance Review Activities*

NASA conducted an on-site review of the AE Department on November 6-10, 2006. During its visit, NASA conducted interviews with eight members of the AE Department faculty (six men and two women) and six University staff members (four women and two men) associated with either the AE Department, the University’s Office of Human Relations Programs (OHRP), or the Campus Senate Human Relations Committee. This included the AE Department Chair, the AE Graduate and Undergraduate Program Directors, the Women in Engineering (WIE) Program Director, the Director of OHRP (who is the University’s Title IX Coordinator), and select AE Department faculty, including several principal investigators of research projects receiving NASA funding.

NASA also conducted one-on-one interviews with 13 students during the on-site visit, including seven graduate students (four women and three men) and six undergraduate students (three women and three men). In addition, two group meetings with students were held. These were attended by 18 students, including eight graduate students (seven men and one woman), and ten undergraduate students (nine men and one woman).

The review was managed and directed by Miguel Torres, Acting Director, Program Planning and Evaluation Division, Office of Diversity and Equal Opportunity (ODEO), NASA. The review team consisted of the following NASA staff: Sharon Wagner, EO Specialist/Title IX Compliance Program Manager, ODEO, David Chambers, EO Specialist/Title VI Compliance Program Manager, ODEO, and Shari Feinberg, Senior Attorney, Office of the General Counsel, who served as the legal advisor.

II. COMPLIANCE REVIEW ANALYSIS

The compliance review analysis provides an assessment regarding each of the sub-issues within the two focus areas of procedural compliance requirements and program administration. The analysis also includes recommendations and promising practices, as appropriate.

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

1. *Compliance Assessment*

²¹ Ibid.

The NASA Title IX regulations state that a recipient must designate a responsible official for Title IX coordination and enforcement, the “Title IX Coordinator.”²² The recipient must notify all students and employees of the Title IX Coordinator’s name, office address, and telephone number.

For Federal agencies evaluating recipient compliance with this provision, the U.S. Department of Justice (DOJ) technical assistance document “Questions and Answers Regarding Title IX Procedural Requirements,” (hereafter referred to as the “Title IX Q&A”) provides some of the basic principles regarding the designation and effective functioning of the Title IX Coordinator within the structure of the recipient institution.²³ For example, the Title IX Q&A states that effective implementation of the Title IX coordinator’s responsibilities includes providing ongoing training, consultation, technical and information services regarding Title IX requirements, grievance issues and compliance programs; and having access to information and authority necessary to enforce compliance requirements.

The University has designated its Director, OHRP as its Title IX Coordinator. The OHRP has campus-wide responsibilities for matters pertaining to equal opportunity and diversity. The OHRP Director plays an oversight role in compliance functions for which the OHRP has responsibility. These functions are delegated to a Campus Compliance Officer who reports directly to the Title IX Coordinator. The OHRP Director has direct access to the University’s President and Chief of Staff, and communicates regularly with the Office of the President by phone and e-mail.

Overall, it appears the OHRP is appropriately implementing and administering the University’s grievance process (see “Adoption of Grievance Procedures,” II(B), below) and that OHRP has the authority necessary to enforce compliance requirements. NASA notes that OHRP’s efforts are particularly strong regarding the provision of ongoing training, consultation, technical assistance and information services (see “Promising Practices,” below).

2. *Recommendation*

The University should ensure that the course University 100 , which currently contains a diversity component, includes specific information and material regarding the University policy and procedures on Title IX, the law’s coverage, and students’ and employees’ right to file Title IX complaints.

3. *Promising Practices*

(a) OHRP disseminates information regarding Title IX in a number of ways. The OHRP Director prepares annual updates on the work of the OHRP and hosts an annual event updating the campus on its services. The OHRP also disseminates materials using MySpace.com and the course University 100, taken by many freshman, which includes a diversity component.

²² Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(a).

²³ This document is accessible at <http://www.usdoj.gov/crt/cor/coord/TitleIXQandA.htm>.

(b) OHRP conducts, as a joint initiative with the University's Department of Education Policy and Leadership, the Intergroup Dialogue Program. The Intergroup Dialogue is essentially an extended group conversation, bringing together students "to build intra- and cross-group awareness, and knowledge and understanding leading to collective engagement in action for social justice." Each intergroup dialogue focuses on a specific diversity related topic, e.g., gender, religion, sexual orientation. Each dialogue program runs for eight weeks, two hours per week, to discuss the history of tension between groups and work to resolve conflicts.

B. Adoption of Title IX Grievance Procedures

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.²⁴

The regulations do not specify a structure or format for the grievance procedures.

However, for agencies reviewing educational institution grievance procedures, the DOJ Title IX Q&A and the U.S. Department of Education (ED) Office for Civil Rights (OCR) document, "Title IX Grievance Procedures: An Introductory Manual," (hereafter Education Manual) provides guidance on some of the basic components of effective grievance procedures.²⁵ For example, recipient grievance procedures should include both an informal and formal process, and should inform the grievant 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.

The University's student grievance procedures are embodied in the Human Relations Code (Code, first adopted in 1998). The OHRP and Campus Equity Administrators inform prospective grievants of their right to file a grievance and the process for doing so. The University warns complainants, the accused parties, and relevant supervisors and administrators advising them of the prohibition against retaliation for engaging the grievance process. In addition, individuals asked to provide information as part of a grievance investigation are advised of the no retaliation provision prior to giving formal statements.

The procedures are generally consistent with DOJ and ED guidance for ensuring prompt and equitable resolution of complaints alleging actions prohibited by Title IX. Accordingly, NASA finds the University in compliance with this requirement. However, NASA notes that the University's compliance regarding its grievance procedures may be strengthened by revising its procedures to clearly state students' rights to file a complaint with the ED OCR or other Federal agencies providing financial assistance to the University and the applicable time-frames for filing (see "Recommendation," below).

²⁴ Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(b).

²⁵ This document is accessible through the U.S. Department of Education's ERIC database at <http://eric.ed.gov/>.

The University reported that no students in the AE Department have engaged the process set forth in the Code, either at the informal or formal stage during the period for which NASA requested data (past five years). The University also reported that the vast majority of discrimination complaints are resolved at the informal stage.

The University reported that the procedures are disseminated at the beginning of the fall and spring semesters. Generally, however, AE Department students interviewed responded that they were not aware of the procedures but were comfortable with going to somebody in the Department, and if need be, they would “go on-line” to obtain this information.

2. *Recommendation*

NASA has recommended that the University revise its grievance procedures to include specific information on students’ rights to file a complaint with the U.S. Department of Education’s Office for Civil Rights or other Federal agencies providing financial assistance to the University, and the applicable time-frames for filing.

3. *Promising Practice*

The grievance procedures and the University’s Sexual Harassment Procedures are disseminated to students each semester via reference in the University Undergraduate Catalogue and are also posted on the University website.

C. **Title IX Policy Dissemination**

1. *Compliance Assessment*

NASA Title IX regulations 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 it 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.²⁶

In addition, DOJ regulations 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.²⁷

The University takes a variety of specific steps to notify students and other stakeholders that it does not discriminate on the basis of sex in the operation of its education programs and activities. These steps include notifications on applications for admission, employment advertisements and applications, procurement contracts, alumni publications, and sponsored research contracts and grants. The University’s Office of Research Advancement and Administration includes an *Assurance of Compliance* that affirms the University’s compliance with Title IX obligations in all Federal contracts and grant proposals.

²⁶ Dissemination of policy, 14 C.F.R. § 1253.140.

²⁷ Public dissemination of Title VI information, 28 C.F.R. § 42.405(c).

The University equal employment opportunity policy statement is posted in personnel offices and distributed to all new employees at orientation. The notice is prominently posted on bulletin boards throughout campus. In addition, the University's non-discrimination policies are published on the Internet at www.president.umd.edu/policies/. These policies also are disseminated to students via the OHRP and at the beginning of each semester via the University's Undergraduate Catalogue and Schedule of Classes.

The University requires co-operative employers to sign non-discrimination assurances in co-operative employment agreements, thus putting them on notice of their obligations under Title IX.

Overall, NASA found that the University's policy dissemination efforts are consistent with NASA and DOJ regulatory requirements. However, interviews conducted with students indicated that while there was a general familiarity with Title IX as a law pertaining to women and athletics, there was less awareness of Title IX's applicability in the academic context, or that the law was intended to protect equal opportunity for both men and women.

Of 13 faculty and staff interviewed (not including the Title IX Coordinator), nine knew the name or at least the office of the Title IX Coordinator. However, of 13 students interviewed individually, none knew the name or office of the Title IX Coordinator, although many said they knew they could easily look this information up on the web if they ever needed it. Most students reported that if they believed they were being treated differently based on their gender they would bring it to the attention of someone they trusted in the Department. This is important in that it shows students feel comfortable enough to go to a faculty or staff member. While NASA recognizes it is unrealistic to expect that students at a large university know the identity of the Title IX Coordinator, compliance would be strengthened if the University takes steps to better ensure familiarity and awareness of Title IX and the OHRP office.

2. *Recommendation*

The AE Department should disseminate information pertaining to the NASA Title IX review, such as the compliance review report and the type of data provided in response to NASA information requests, to other departments in the School of Engineering and University science departments, to promote greater understanding and awareness among faculty and staff in other science and engineering fields on Title IX.

3. *Promising Practices*

(a) The University has posted the NASA brochure "Nondiscrimination and Equal Opportunity in NASA Assisted Programs: Title VI of the Civil Rights Act of 1964 and Related Laws," which includes specific information on Title IX, in prominent places on University websites, including the AE Department website, and the home page of the OHRP, where it currently appears under a heading called "Hot Topics." The brochure is downloadable in both text and PDF formats.

(b) The AE Department plans to disseminate electronically the NASA brochure to all AE graduate students, many of whom work on NASA-assisted research projects, at the beginning of each academic year to better ensure that program beneficiaries are apprised of Title IX's protections, including the right to file a Title IX complaint with NASA.

D. Self-Evaluation

1. Compliance Assessment

The NASA Title IX regulations required recipient institutions to conduct a Title IX self-evaluation by September 29, 2001.²⁸ This provision was based on a requirement in the ED Title IX regulations, originally issued in 1980. The NASA regulations, issued in August 2000 as part of a Common Rule coordinated by DOJ, incorporated the ED requirement. However, DOJ intended the Common Rule requirement to apply to non-traditional educational institutions, assuming that traditional educational institutions such as universities and colleges had fulfilled ED's self-evaluation requirement.

While the University is not obligated to conduct a Title IX self-evaluation, such evaluations could be very helpful at the departmental level to ensure, for example, that criteria or practices used to select incoming students are not having an adverse impact based on gender. They also provide an opportunity to evaluate trends over time and develop mechanisms for addressing emerging issues.

NASA notes with approval that the University, as a matter of policy, performs on-going evaluations of academic and administrative policies and practices and their effects, by gender, on the faculty, students, and staff. The University Vice-President for Academic Affairs and Provost requires all academic units to provide an annual diversity assessment for faculty, students, and staff (see also "Promising Practices," below).

NASA considers the AE Department to have conducted a very thorough Title IX self-evaluation through its response to information requests for this Title IX compliance review. The University gathered and synthesized significant amounts of data, including statistical data by gender in the areas of admissions, enrollment, and retention, as well as extensive information on policies and procedures. Several AE Department faculty and administrators stated that the data collected in response to NASA's Title IX review have afforded the Department an opportunity to examine the data in a fresh light.

2. Recommendations

(a) The AE Department should disseminate information regarding this Title IX compliance review to key stakeholders within the University community. For example, the AE Department should conduct a briefing on the NASA Title IX compliance review, including relevant observations, recommendations and promising practices identified, for stakeholders such as the AE Advisory Board, the President's Committee on Women's Issues, the Campus Senate, and the OHRP.

²⁸ Self-evaluation, 14 C.F.R. § 1253.110(c).

(b) The AE Department should incorporate Title IX review information into its Diversity Assessment Report, specifically regarding significant actions and future steps.

3. *Promising Practices*

(a) The University conducts a number of periodic evaluations which address Title IX requirements. For example, the University’s Equity Council continually monitors hiring practices through the collection and review of employment search data. With respect to students, a Campus Assessment Working Group analyzes gender issues through surveys of the student population.

(b) The University requires all Colleges and Departments to prepare an annual Diversity Self-Assessment. The most recent version of this document for the College of Engineering and the AE Department provides detailed information on diversity efforts and next steps.

E. Admissions, Recruitment, Outreach, and Retention

1. *Compliance Assessment*

The NASA Title IX regulations state that recipients may not discriminate on the basis of sex in admissions and recruitment.²⁹ Consistent with this requirement, NASA examined male and female participation rates at the undergraduate and graduate levels in the areas of admissions, acceptances, enrollments, and program advancement opportunities (e.g., participation in the AE Department’s Undergraduate Honors Program), graduate fellowships and research assistantships.

(a) Undergraduate Students

The AE Department undergraduate student enrollment for Academic Year (AY) 2006 was 344 students (see Table E-1). Of these, 57 (16.6 percent) were women and 287 (83.4 percent) were men. NASA notes with concern that female enrollment in AE, while higher in AY 2006 than in AY 2004 or AY 2005 (15 percent), is lower than in AY 2003 when 65 female students (19.9 percent) were enrolled. The percentage of female AE students was also higher in AY 2001 (18.9 percent) and AY 2002 (16.9 percent) than in the past three years. Many AE faculty were unaware of the declining numbers of undergraduate women enrolled in the Department and were at a loss to explain the lower numbers.

	Fall 2001	Fall 2002	Fall 2003	Fall 2004	Fall 2005	Fall 2006
Female	49	54	65	53	55	57
Male	209	266	263	300	310	287
Total	258	320	328	353	365	344

Source: UMCP Aerospace Engineering Department

Table E-1. Undergraduate AE Enrollment by Gender, Fall 2001-Fall 2006

²⁹ Admission, 14 C.F.R. § 1253.300; Recruitment, § 1253.310.

Retention rates for the program do not show significant differentials based on gender. In fact, women tend to leave the program at slightly lower rates than men and complete the program at faster rates than the men. For example, data provided by the University show that in cohorts of AE students graduating within six years, 37 percent of women graduated after six years, compared to 31 percent of male students. Overall grade point averages (GPA) of undergraduate women also tended to be slightly higher than men's.

The AE Department began an Undergraduate Honors Program in AY 1998. Each year approximately 20 students are invited to join the program following their freshman year. Participants for the program are selected by an Honors Committee, overseen by the Undergraduate Program/Honors Program Director. The current Honors Committee is gender diverse and the program brochure includes images of both men and women students.

A review of AY 2006 Honors Program enrollment data revealed that of 69 students in the program, 14.5 percent (10) were women and 85.5 percent (59) were males. Alumni of the Honors Program since its inception in AY 1998 total 62, 21 percent of whom are women and 79 percent males. The AY 2006 enrollment figures indicate a decline in the participation of women in the AE Honors Program, which is of concern regarding an objective of continued success in the enrollment of women in AE.

(b) Graduate Students

In AY 2005, there were 168 students enrolled in the AE graduate program, of whom 27 were women (16.1 percent) and 141 (83.9 percent) were men (see Table E-2). In the four previous AYs, the average percentage of female graduate students was 15.4 percent, peaking at 18.4 percent in AY 2004.

		Fall 2001	Fall 2002	Fall 2003	Fall 2004	Fall 2005
Doctoral	Female	6	7	11	13	12
	Male	64	63	58	65	62
	Total	70	70	69	78	74
Masters	Female	8	9	15	17	15
	Male	43	53	60	68	79
	Total	51	62	75	85	94
Total Combined	Female	14	16	26	30	27
	Male	107	116	118	133	141
	Total	121	132	144	163	168

Source: UMCP Aerospace Engineering Department

Table E-2. Graduate AE Enrollment by Gender, Fall 2001-Fall 2005

NASA notes that the enrolled vs. accepted rate is lower for female applicants than for male applicants. For example, in AY 2005, 51.5 percent of female applicants were accepted, but only 41.2 percent of those enrolled. This compares to an acceptance rate of 35.6 percent for the male

applicants, with an enrollment rate of 54.4 percent. In prior years, the gap between the male and female enrollment/acceptance rates was even higher. Only in one of the five years examined (AY 2002), was the enrollment/acceptance rate higher for female applicants than for male applicants.

The AE Department supports several forms of financial assistance packages, including Fellowships, Research Assistantships (RAs), Teaching Assistantships (TAs), and various combinations, such as half-Fellow, half-RA. The AE Department uses informal procedures to select graduate students for RA and TA positions. Generally, faculty members specify the area, e.g., aerodynamics, and the characteristics, e.g., chemistry background, they are looking for and review the departmental applicants who meet their criteria. Once a faculty member has identified potential candidates, he/she may contact them directly and conduct a telephone interview, or request that an RA be proffered. The Graduate Committee Director then formalizes this offer and may add fellowship enhancements based on the academic record of the student.

NASA notes that informal procedures for selecting graduate students for RA and TA positions reduces transparency and may increase subjectivity in the decision-making process. However, NASA found no evidence in the two most recent AYs (the years for which the University was able to provide detailed data), to indicate that one gender was being treated differently or adversely impacted with regards to graduate financial assistance. For example, in AY 2005, 39 percent of female applicants were accepted with funding, as compared to 28 percent of male applicants who were accepted and funded. Similarly in AY 2006, 29 percent of female applicants were accepted and funded, compared with 20 percent of male applicants who were accepted and funded.

Also, women graduate students received slightly higher average amounts of funding than men (\$25,767 for women, \$25,136 for men in AY 2005; \$26,224 for women, \$26,065 for men in AY 2006). Finally, there was no indication that graduate students were being funneled into TAs, rather than the higher status Fellowships or RAs, based on gender.

Overall, NASA found no evidence of differential treatment based on gender with regard to admissions, enrollment, or retention in either the undergraduate or graduate AE programs. Nor did NASA's review indicate that the AE Department has a neutral policy or practice that is unintentionally contributing to the numerical differences between men and women in overall enrollment. In fact, the AE Department appears to be aggressively recruiting and directing outreach in part, toward increasing gender diversity at both the undergraduate and graduate levels (see "Promising Practices," below). Additionally, NASA notes that while the numbers of women in engineering nation-wide show a consistent decline at every level, from high school to doctoral degree, the AE Department statistics show that from undergraduate to graduate programs their numbers of female students remain stable.

2. *Recommendations*

(a) The AE Department should continue its aggressive outreach and recruitment efforts to increase the number of women enrolled in the program (see "Promising Practices, below").

(b) The AE Department should carefully review and analyze data gathered pursuant to this Title IX review, and continue to collect and study such data, especially data pertaining to admissions and enrollment. The AE Department should analyze trends in admission and enrollment rates at both the undergraduate and graduate levels to determine the need for additional efforts. For example, the AE Department should survey accepted graduate students who do not enroll to try and ascertain the reasons for non-enrollment. They should use the data to narrow the gap between the accepted pool and number of female applicants who ultimately enroll.

(c) The AE Department should evaluate whether formalizing its procedures for selecting students for RA and TA positions would enhance transparency in this process.

3. *Promising Practices*

(a) The AE Department established an Aerospace Engineering Advisory Board (the Advisory Board) in 1996. The Advisory Board members are private and public sector professionals who provide advice to the AE Department, bringing together both industry and academic perspectives. The Board advises on AE Department policy, including efforts to sustain the program's commitment to diversity.

(b) The AE Department faculty and staff commitment to gender diversity is evident in a variety of tangible actions and efforts. Each spring, as prospective students are making final decisions on colleges and majors, AE faculty members make personal phone calls to prospective students. The Research Fellow Program provides undergraduate students an opportunity to collaborate on research with faculty members. Women undergraduates may choose to work with women faculty members conducting research in a field in which the student is interested.

(c) The AE Department assists with programs sponsored and conducted by the Women in Engineering (WIE) office, providing faculty (both male and female) to speak with the participants about the aerospace undergraduate curriculum and profession as a whole. The AE Department participates in a number of outreach programs to junior high school and high school students and prospective AE majors. The AE Department is augmenting the Student Ambassadors Program to include graduate students.

(d) The AE Department has committed a significant amount of resources to its recruitment and outreach efforts, including a full-time Recruitment and Outreach Coordinator. The AE Department also utilizes the services of a full-time WIE Program Director who holds a doctorate in industrial and systems engineering. The WIE Director has a full-time staff assistant. With newly dedicated office space and a full-time staff person, the WIE Director describes a concerted, focused effort regarding outreach and recruitment. Both the WIE Director and Recruitment and Outreach Coordinator are fully integrated into decision-making within the Department. For example, the WIE Director reviews College of Engineering publications and provides in-put. Major WIE Activities include:

- Peer Mentoring program.
- Professional engineering mentoring program.

- Summer programs to talk to high school teachers about doing better job of interesting women in math.
- Piloting an academy program that will focus on specific Departments within the College of Engineering.
- Research fellowship and teaching fellowship.
- Measurement of program outcomes and success

(e) The WIE Director is conducting research on program delivery and impact of the Research Internships in Science and Engineering (RISE) First Year Summer Experience (FYSE) Program. RISE FYSE is designed to introduce female students to college life and the S&E academic environment, and to help them develop tools to deal with potential barriers to success in S&E, including “internal” barriers such as lower levels of self-efficacy, confidence, and satisfaction as compared to men. The directors of RISE have secured funding from the National Science Foundation to conduct research investigating factors that influence choice of academic major among first year female students who have not yet committed to S&E fields, with the goal of increasing the pipeline of women interested in pursuing S&E majors.

(f) Statistical data for outreach and summer programs are maintained by the Office of Undergraduate Recruitment and Special Program (URSP). Results of the statistical data are used to assess the effectiveness of the outreach programs with respect the enrollment of women in the School of Engineering. Information includes application rates to the University and the School of Engineering, offers of admission from the School, and the percentage that matriculates to the School. Future expansion of this data is planned to include tracing the retention and graduate rates of these students.

(g) AE Department communications materials such as its Honors Program brochure and its website show gender diversity, highlighting successes of faculty and students, and giving equal visibility to achievements of male and female faculty and students. An excellent example of emphasizing the gender diversity of the program in communications materials is the School of Engineering’s Fall 2004 edition of *E@M*, which featured a cover article, entitled “Opening Doors for Female Engineering Students.” The article describes the School of Engineering’s efforts to raise student interest in engineering at the K-12 level, work in building support networks for women students, and commitment to increasing the number of women on the Engineering faculty.

(h) In the past two years, the College of Engineering has allocated funds to departments based on an algorithm, including characteristics of the current student population. Diversity is one of the criteria for how well each department is doing (along with others, of course, such as GPA and GRE). Funding is “outcome based,” i.e., the incentive is built in and reported on so that Departments receive money based on what they have already accomplished.

F. Academic Advising/Career Counseling

1. Compliance Assessment

The Title IX regulations state that a recipient may not discriminate on the basis of gender with regard to career counseling or guidance.³⁰

The AE Department reported that undergraduate students entering the program are randomly assigned a faculty advisor. At the graduate level, students tend to be advised by the professor who is doing research in their area of interest. There is no formal system for assigning graduate students faculty advisors.

Students interviewed by NASA reported that they were generally satisfied with the academic advising process. This was particularly true among graduate students, who have greater interaction with their advisors than undergraduates.

The faculty members NASA interviewed showed a high level of awareness of the need to create a learning environment in which all students are valued, respected and treated fairly. A number of faculty noted the importance of high-lighting the academic and research accomplishments of men and women equally.

None of the students interviewed indicated that they had ever been treated differently on the basis of gender with regard to academic advising or career counseling. NASA did not find any evidence that students were treated differently or experienced an adverse impact based on gender with regard to academic advising or career counseling.

2. *Promising Practice*

AE Department students interviewed indicated that they often had more than one faculty member from whom they sought advice, in addition to their formally assigned advisor. Furthermore, the AE Dept. does not place any restrictions on students seeking to change advisors.

G. Learning Environment: Research Participation/Classroom Experience

1. *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.³¹ In addition, 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.³²

(a) Research Participation

³⁰ Counseling and use of appraisal and counseling materials, 14 C.F.R. § 1253.425.

³¹ Education programs or activities, 14 C.F.R. § 1253.400(a), (b)(7).

³² Enforcement procedures, 14 C.F.R. § 1253.605.

NASA examined whether students were treated differently or otherwise limited, on the basis of gender, with regard to research participation, including whether there was any indication of sexual harassment by faculty or graduate students in positions of responsibility.

The AE Department reported graduate student participation on several major NASA-funded research projects for AYs 2003-2005. The participation rate of female students on these research projects varied. During the three year period, the “Technology Development for Autonomous Sampling (TDAS)” research project employed 11 women out of 38 research assistants (28.9 percent). The Center for Rotorcraft Education and Research employed eight women out of 60 research assistants (13.3 percent) and the “Third Generation Reusable Launch Vehicle Technology (URETI)” project employed nine women out of 70 (12.9 percent) for AYs 2004-2006.

The participation rate of women in the TDAS research project (28.9 percent) is much higher than the overall participation rate of women in the AE Department graduate program for the same three year period (17.5 percent). NASA notes that the Principal Investigator for the TDAS project stated that when making selections for research assistantships, once he has isolated the best-qualified applicants, he makes every effort to ensure gender diversity in his final selections. All of the students interviewed indicated that they believed research assignments were made on the basis of research interests and unrelated to gender.

Regarding access to laboratory equipment, several female students said that occasionally heavy lifting was required in the lab, and that they sometimes requested the assistance of male students to assist them in moving heavy objects or equipment. It appears that the space suit used for research purposes in the Space Systems Laboratory is designed for a male astronaut. One student stated that “it would be nice” if there were a suit designed for a female astronaut. NASA notes that the Director of the Space Systems Lab stated that at the time the suit was developed, he was the only experienced test subject for research involving the suit. However, the lab is actively seeking funds needed to develop a suit prototype designed for women.

Several male graduate students noted that they benefited greatly from informal mentor-mentee relationships. These students described being taken under the wing of older graduate students doing research in the same area. Female graduate students often cited female faculty members as formal or informal mentors. However, several students cited opposite gender faculty members as the person they would most likely go to with academic or other concerns.

(b) Classroom Experiences

NASA examined whether students were treated differently or otherwise limited in program participation, based on gender, in their classroom experiences.

The University provided data for AYs 2002-2006 showing percentages of participation by gender in each course within the AE undergraduate program. The data showed that women’s participation in the astronautical track courses reached 24 percent, higher than overall rates of program participation for women. Women’s participation in the aeronautical track courses was lower (11 to 13 percent) than their overall enrollment in the undergraduate AE program. Many

students and faculty members stated that, in general, women were simply more interested in astronautics than aeronautics.

Students interviewed reported that they did not notice differences in the way male and female students are treated by faculty members in the class room. Students believed that professors were generally responsive and encouraging of participation regardless of the student's gender.

Regarding classroom team assignments, students agreed that although teams usually included more male than female members, team leadership did not correlate with gender. Students stated that team dynamics were based on individual characteristics and styles, and students of both genders stated that they had observed both men and women take leadership roles on team assignments. Several students voiced the belief that associating characteristics such as "assertive" or "persuasive" with gender, rather than as matters of individual style and background, perpetuates stereotypes.

Faculty members agreed with students that team functioning is fundamentally about individual styles, regardless of the gender composition. Some faculty members stated that they include gender composition as a factor in choosing teams (see "Promising Practices," below). There is a particular concern when there is only one woman on a team, because the woman is sometimes marginalized. However, the predominance of AE classes have at least several women students.

(c) Overall Learning Environment

Students and faculty agreed that the AE Department actively sought to provide the kind of welcoming and inclusive environment conducive to an increasingly diverse student body. The AE Department appears consciously aware of the need to recognize and offer encouragement to male and female students equally in the classroom and laboratory settings. Both faculty and staff recognize the need for education and awareness around diversity issues, including sensitivity to subtle differences in treatment that may impact others in an unintended way.

2. *Recommendations*

(a) The AE Department, in consultation with the WIE Program Director, should include gender-related items in course evaluations to determine if there are any issues relating to gender in the classroom (e.g., "Regarding team projects, in your experience, did gender play a role in the leadership, organization, interaction, or other aspect of the team dynamic?").

(b) The AE Department, in consultation with the WIE Program Director, should periodically review enrollment rates by gender, in course offerings to assess the viability of implementing alternative methods, e.g., curricular modifications, that may assist in boosting female participation in courses with low female enrollment rates.

(c) The AE Department, in consultation with the WIE Program Director, should periodically review participation rates by gender in research projects, e.g., Center for Rotorcraft Education, to examine the reasons for the lower participation rates and assess methods to increase women's participation rates.

(d) The AE Department, in consultation with the WIE Program Director, should formalize exit interviews with all graduating students and include a question pertaining to gender, e.g., “do you feel any program opportunities were limited or unavailable to you because of your gender?”

3. *Promising Practices*

(a) The University Strategic Plan, issued in 2000, describes “Five Initiatives” including ensuring “a university environment that is inclusive as to diversity and fosters a spirit of community among faculty, staff, and students.” This initiative has a number of specific and measurable steps for implementation, e.g., developing coherent and comprehensive strategies to increase the diversity of faculty and staff.

(b) The College of Engineering Five-year Strategic Plan includes among its six Strategic Initiatives, focusing on steps to ensure an environment that promotes diversity and fosters a spirit of collegiality. The initiative includes specific steps such as continuing to strengthen outreach programs aimed at minority and female high school students, and creating more opportunities to celebrate and regard success and excellence of faculty, staff, and students. NASA observed the successful implementation of these steps (see “Recruitment and Outreach, and “Learning Environment” below).

(c) The University has a “Statement on Classroom Climate” published in its “Faculty Handbook of Policies and Resources.” The statement lays out the basic policy: the University values the diversity of its student body and is committed to providing a classroom atmosphere that encourages the equitable participation of all students. The statement also emphasizes the need for classroom instructors to be equitable in opportunities provided for contributing in class, and the need to ensure that the classroom is a “hospitable environment” for everyone, e.g., no joking at the expense of any group.

(d) The University’s Aerospace Engineering (ENAE) 100 class is designed to appeal to a diverse group of students. The course includes numerous presentations from a racially and gender diverse group of individuals, and is a means of providing role models for students interested in pursuing careers in engineering. The course addresses the practical applications or “service orientation” suggested in the research literature as means of appealing to a diverse group of students.

(e) Several faculty members reported that they considered factors such as personal preferences for team partners, range of academic skills, and skills in particular areas, e.g., computer-aided design, when making team assignments. Some AE Department faculty members include gender diversity among the criteria used in making classroom research team assignments, to better ensure that women students do not feel marginalized by being the only female on a given team.

(f) The AE Department's efforts to create a welcoming environment for all students and an understanding of diversity principles include regular "Town Hall Meetings" instituted by the Department Chair. The Chair said that he uses these gatherings in part to publicly honor students who are doing excellent work. At a recent Town Hall Meeting, the students receiving recognition included both full-time and part-time female graduate students. The Town Hall meetings afford opportunities for open dialogue and recognition of students, helping the AE Department to demonstrate its commitment to inclusion and celebrate its diversity.

H. Parental/Marital Status ("Family Friendly" Policies)

1. Compliance Assessment

The NASA Title IX regulations include a detailed provision on matters pertaining to marital and parental status.³³ 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. Regarding pregnancy and related conditions, the regulations state that a recipient may not discriminate against any student, on the basis of the student's pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery, unless the student requests voluntarily to participate in a separate portion of the program or activity of the recipient.

The University Graduate School adopted a "Leave of Absence Policy for Graduate Students for Childbearing, Adoption, Illness, and Dependent Care," effective April 25, 2005. The policy permits graduate student extensions in order to meet degree time requirements. Under the policy, the time taken on an approved leave of absence is not included in the time limitations for degree completion and advancement to candidacy.

Data provided by the University regarding requests for leaves of absence in the past two AYs indicate no requests made by AE students. However, the University provided data for the other departments of the School of Engineering. The data show that seven women students requested and were granted leave for childbearing during this period. Two women and one man requested leave for dependent care. NASA found no indication of differential treatment based on gender pertaining to parental/marital status.

2. Recommendations

(a) Regarding self-evaluation, the AE Department should evaluate the extent to which the University's child care facility (see "Promising Practices," below) played a role in students choosing the University. The AE Department also should periodically evaluate the extent to which the child-care center is used by its students to analyze trends over time, e.g., increase in the number of graduate students making use of the facility.

(b) The University should maintain comprehensive data regarding underlying reasons for extensions requests, to better evaluate the functioning of the Leave of Absence policy and assess the need for changes to the policy.

³³ Marital or parental status, 14 C.F.R. § 1253.530.

3. *Promising Practices*

- (a) The University provides an on-campus child care center with priority access for faculty, staff and students.
- (b) An exceptional “family-friendly” policy of the AE Department is that it provides full health care coverage, including spousal and child coverage, to graduate students receiving fellowships, research assistantships, and teaching assistantships.

I. **Safety Policies**

1. *Compliance Assessment*

As stated, the NASA Title IX regulations provide that a recipient shall not, on the basis of sex, 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.³⁴ 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.

NASA sought to determine whether issues of safety had an impact on program participation. Some female students stated that they would feel safer walking to their car after leaving the lab late at night or early in the morning if there was better lighting in the parking lots. One student suggested that a police car be stationed in every parking lot on campus.

However, NASA did not find any indication that students felt that their participation in the program was limited in any way due to safety concerns. Students stated that the AE Department, including the research labs, is a safe environment.

The concerns expressed by students, both male and female, pertained to campus safety in general and were not attributable to steps the AE Department was failing to take to better ensure the physical safety of program participants. NASA notes that the University addresses issues of campus safety through a variety efforts and initiatives (see “Promising Practices, below).

2. *Recommendation*

The AE Department should work with other University stakeholders, e.g., Campus Police/Security, OHRP, and the President’s Commission on Women’s Issues to continue to address issues around campus safety.

3. *Promising Practices*

³⁴ Education programs or activities, 14 C.F.R. § 1253.400(b)(7).

- (a) The University's Police Auxiliary maintain a roving patrol by vehicle of the University's surface parking lots and five garages as well as those of its golf course and off-campus residence halls.
- (b) The campus has approximately 300 video surveillance cameras positioned in strategic locations around campus, of which the police monitor approximately 181 on a 24 hour/7 day a week basis. The University also has 300 emergency "blue light" telephones positioned around campus for use by the campus community in the event of a safety risk.
- (c) The University operates a regular Shuttle Service to facilitate transport around campus, as well as N.I.T.E. Ride, an on-demand curb-to-curb escort bus service when shuttle buses are no longer in operation. The Department of Public Safety also offers a personal escort service for anyone who feels unsafe when walking across campus at night.
- (d) The University Department of Public Safety (DPS) maintains a website providing extensive information on campus safety and security including crime reports and incident logs, victim recourses and crime alerts. The DPS runs a Threat Assessment Program (TAP) in which trained personnel act as Case Management Officers and assist in assessing threats. Cases may include harassment, stalking, and/or workplace or relationship violence. The DPS provides crime prevention programs to students, faculty and staff on request. These include, among others, timely warning notices regarding crimes which may present a threat to the campus community, Rape Aggression Defense (RAD), and sexual assault awareness.
- (e) OHRP serves on a Sexual Assault Task Force that worked hard to get funding for a full-time coordinator. The Title IX Coordinator serves as an ad hoc representative on this task force. OHRP also is involved in other local police task forces regarding campus safety. The issue of safety is often raised and discussed among students in OHRP's Intergroup Dialogue Project, particularly in the women's discussion groups. OHRP has been involved when near-campus bars promote unsafe events (e.g., "women's lock-down" at one bar). OHRP works with the fraternity leaders regarding safety, and educates bar proprietors.

J. Sexual Harassment Prevention Policies

1. Compliance Assessment

As stated, the NASA Title IX regulations provide that a recipient shall not, on the basis of sex, 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.³⁵

University policy requires all complaints that come to the attention of University administrators that possibly involve sexual harassment must involve notification and consultation with either the Campus Compliance Officer or the Office of Legal Affairs. In some instances, matters brought to the attention of OHRP are referred to the Office of Legal Affairs for investigation and resolution.

³⁵ Education programs or activities, 14 C.F.R. § 1253.400(a), (b)(7).

The University's policy on sexual harassment is consistent with federal guidelines for such policy. The policy emphasizes: the University's commitment to maintaining an academic and work environment free of sexual harassment; that sexual harassment will not be tolerated and is a violation of law and University policy; and that sexual harassment may result in disciplinary action up to and including termination. In addition, the policy states that retaliation for use of the University complaint resolution procedures is strictly prohibited and will result in disciplinary action.

There was a general consensus among students and faculty that interactions between faculty members and student research assistants in the laboratory were appropriate and respectful. None of the students interviewed reported that they had been sexually harassed or had observed sexual harassment occurring in the laboratory. Several students stated that anyone engaging in inappropriate behavior such as offensive remarks based on race or gender would probably be viewed as an oddity.

NASA found no indication of sexual harassment occurring within the AE Department

2. *Recommendations*

- (a) As with the grievance procedures, the sexual harassment policy memorandum should inform students of the right to file a complaint with the U.S. Department of Education Office for Civil Rights, or other Federal agency providing financial assistance to the University.
- (b) The AE Department should ensure that graduate students take at least one training, seminar, or workshop on sexual harassment during their first year in the program.

3. *Promising Practices*

- (a) The University's Sexual Harassment Policy and Procedures are distributed annually in hard copy format to more than 19,500 University employees. The Policy and Procedures are accompanied by a memorandum from the President of the University to all faculty, staff and student employees (including graduate student employees).
- (b) The OHRP provides training through the Sexual Harassment Prevention Program. OHRP provides training to specific campus groups at the request of campus equity officers. OHRP conducts sexual harassment prevention training in dorms and trains all Resident Assistants (RAs) on sexual harassment. The majority of campus units mandate sexual harassment training for their employees on a periodic basis. Sexual harassment training is encouraged, but optional in units reporting to the Vice President of Academic Affairs.

CONCLUSION

Based on a thorough evaluation of the data provided by the University and from on-site interviews and observations, NASA found no evidence of non-compliance with the NASA Title IX regulations. As the Assistant Administrator for Diversity and Equal Opportunity stated in her correspondence to President Mote, NASA finds that the University of Maryland Aerospace Engineering Department is, in many ways, a model program for gender equity, particularly regarding its aggressive outreach and recruitment efforts and its demonstrated leadership commitment to create a welcoming and inclusive environment that values all students. NASA notes with approval the extent and variety of promising practices the University is undertaking in its efforts to increase the participation of women in its Aerospace Engineering Department and to ensure equal educational opportunity regardless of gender.