TABLE OF CONTENTS

I. INTRODUCTION
   A. Background .............................................................. 3
   B. Objectives and Scope ................................................ 4
   C. Methodology ............................................................. 4

II. COMPLIANCE REVIEW ANALYSIS
   A. Designation of Title IX Coordinator ............................. 7
   B. Adoption of Title IX Grievance Procedures .................... 8
   C. Title IX Policy Dissemination ...................................... 10
   D. Self-Evaluation .......................................................... 11
   E. Admissions, Recruitment/Outreach ................................. 12
   F. Academic Advising/Career Counseling ............................. 16
   G. Academic Environment (Research Participation/
      Classroom Experience) ............................................. 17
   H. Parental/Marital Status (“Family Friendly”) Policies .......... 20
   I. Safety Policies .......................................................... 21
   J. Sexual Harassment Policies ......................................... 22

III. CONCLUSION ................................................................. 25

Cover photo: University of Michigan Undergraduate Research Opportunity Program (UROP) students join other
student winners, NASA astronauts, pilots, and other officials in front of the NASA KC-135A turbojet after their zero
gravity flight in 2004. The UROP team’s research proposal to use iodine with magnesium as a fuel source on Mars,
won them the highly competitive trip to NASA’s Johnson Space Center in Houston to participate in the Reduced
Gravity Student Flight Opportunities Program.
I. INTRODUCTION

NASA conducted a compliance review of the University of Michigan Aerospace Engineering Department to ensure that beneficiaries of NASA grants 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 and regulations to ensure that educational programs the Agency assists financially provide equal opportunities regardless of sex. This policy is based on Title IX of the Education Amendments of 1972, and NASA’s implementing regulations, which prohibit discrimination on the basis of sex in educational programs and activities receiving Federal financial assistance.

A. Background

1. Title IX Regulations and Other Relevant Law

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

2. Government Accountability Office Report on Title IX Compliance Activities Regarding Science, Technology, Engineering and Math (STEM) Fields

NASA’s Title IX compliance program received further impetus from the July 2004 recommendation of the Government Accountability Office (GAO) for Federal agencies to conduct on-site compliance reviews in STEM fields. Beginning in late 2004, NASA participated as a member in an Interagency Task Force to plan Title IX compliance reviews of Federal grant recipients, growing out of recommendations from the GAO report.

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2 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.
3 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)).
4 65 Fed. Reg. 52,865.
5 NASA Authorization Act of 2005 (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.
B. Objectives and Scope

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

- To evaluate the University of Michigan’s (U-M) compliance with NASA Title IX regulations, including: 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; outreach, recruitment, admission and enrollment practices; faculty advising/career counseling; research participation and classroom experiences; and policies relating to parental/marital status, safety and sexual harassment.

- To report on promising practices of the U-M Aerospace Engineering (AE) Department in promoting gender equity and increasing the number of women participating in its 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 review was limited in scope to the AE Department, including both the undergraduate and graduate programs.

C. Methodology

1. Compliance Review Plan

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

- Procedural Compliance Requirements
  - Title IX Coordinator roles and responsibilities
  - Title IX policy/dissemination
  - Title IX grievance procedures
  - Self-evaluation

- Program Administration
  - Outreach, recruitment, admissions and enrollment
  - Faculty advising and career counseling
  - Research participation and 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 two 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. 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.” The report was a valuable tool to better
understand women’s experiences in S&E studies and helped to guide NASA’s assessment of the
AE Department’s promising practices regarding recruitment and advancement of women
students in S&E programs.

For example, the report identified the need to create and institutionalize a sustained commitment
to diversity among university leaders and administrators. 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. 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.

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.\(^{14}\) Another important tool for S&E departments is training to raise awareness among faculty and students on gender issues such as sexual harassment prevention.\(^{15}\)

Finally, the NRC report described issues that “may not be anticipated” influencing the working environment of the laboratory.\(^{16}\) 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.

NASA notes that the University 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” sections below).

3. On-site Compliance Review Activities

NASA conducted two on-site visits to the U-M. During the first visit in August 2006, NASA interviewed the Title IX Coordinator, the Director of Women in Science and Engineering (WISE), the Program Director of the Women in Science and Engineering Residential Program, the Director of ADVANCE (a National Science Foundation funded project), and the Director of Women in Engineering. The latter four individuals are female.

In December 2006, NASA visited the campus to conduct additional interviews. Over four days, the four-person NASA team conducted 26 interviews and held two student-only “town hall” meetings. Among those interviewed during the December on-site were the Associate Dean of the College of Engineering (CoE), the Chair of the AE Department, the current and former chairs and two current members of the AE graduate admissions committee, and the chair and a current member of the undergraduate AE committee. All of these individuals are male. NASA also interviewed two female faculty including an AE professor and a faculty member of another department in the CoE who is an adjunct professor in AE.

Interviews were conducted with five graduate AE students (individually), including four females and one male, and one female undergraduate AE student. The two town hall meetings, advertised on NASA’s behalf by the Title IX Coordinator, were attended by ten graduate students, including one female.

The NASA team also interviewed the Director of the Engineering Advising Center, the Associate Director for the Education of Women, the President of the Academic Women’s Caucus, and re-

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\(^{15}\) Ibid., chap. 4, p. 78

\(^{16}\) Ibid., chap. 2, p. 41.
interviewed the Director of ADVANCE and the Director of WISE. All of these individuals are female.

The review was managed and directed by Miguel Torres, Acting Director, Strategic Planning and Programs Division, NASA. The review team consisted of the following NASA staff: Sharon Wagner, EO Specialist/Title IX Program Manager, David Chambers, EO Specialist/Title VI Program Manager, and Omega Jones, EO Assistant. Consultant staff included: Nan D. Stein, Ed.D., and Stephen Appell, M.A. Shari Feinberg, Senior Attorney, NASA Office of the General Counsel served as the legal advisor on the project.

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

The NASA Title IX regulations state that a recipient must designate a “Title IX Coordinator,” i.e., an official responsible for Title IX coordination and enforcement. The recipient must notify all students and employees of the Title IX Coordinator’s name, office addresses, 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,” (“Title IX Q&A”) provides the basic principles regarding the designation and effective functioning of the Title IX Coordinator within the structure of the recipient institution. 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 the access to information and authority necessary to enforce compliance requirements.

At U-M, the Assistant Provost and Senior Director for Institutional Equity is designated as the University’s Title IX Coordinator. The Office of Institutional Equity (OIE) was formed in 2003 when the Sexual Harassment Policy Office and the Office for a Multicultural Community were combined. The Title IX Coordinator, as head of the OIE, reports to the Senior Vice Provost for Academic Affairs. He also reports to the Associate Vice Provost for Human Resources.

The Senior Director of OIE supervises staff responsible for campus climate, diversity training, mediation, and technical assistance to faculty and staff. The OIE oversees and supports the

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17 Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(a).
18 This document is accessible at [http://www.usdoj.gov/crt/cor/coord/TitleIXQandA.htm](http://www.usdoj.gov/crt/cor/coord/TitleIXQandA.htm).
University’s compliance efforts in the areas of equal opportunity, affirmative action, harassment and discrimination prevention, and compliance with all applicable State and Federal civil rights laws, including Title IX.

Although responsibility for diversity and inclusion is spread among several offices within the University, the OIE is identified by the University in its Non-Discrimination Policy Notice as the primary resource for individuals with discrimination or harassment concerns. In general, complaints against faculty and staff are handled by the OIE and complaints against students are handled by the Office of Student Complaint Resolution or the Rackham Graduate School.

NASA notes with approval that OIE’s efforts are particularly strong regarding the provision of student training and communications efforts regarding civil rights laws (see “Promising Practices,” below). In addition, it appears OIE is appropriately implementing and administering the University’s process pertaining to discrimination complaints filed against university employees, and OIE appears to have the authority necessary to enforce compliance requirements. However, NASA notes several concerns with the University’s policies and procedures regarding discrimination and discriminatory harassment (see discussion on grievance procedures, II.B. below; see also discussion on sexual harassment prevention policies, II.J.)

3. Promising Practices

(a) The Title IX Coordinator informed NASA that the OIE has conducted a significant amount of training related to Title IX. OIE provided training to 4,000 members of the University community in 2005, including training to 1,000 graduate students. He also cited a significant amount of training provided to faculty and students on sexual harassment. He informed NASA that the non-discrimination statement is widely distributed and is on web sites and on all university publications.

(b) During academic year 2006, the University, through the OIE, introduced a new university-wide initiative called Campus Commitment. The Campus Commitment provides clear definitions of discrimination and harassment prohibited by University policy, as well as where and how to report concerns. Information regarding the Campus Commitment can be accessed from the OIE webpage under a heading called, “Discrimination and Harassment.” The Campus Commitment initiative includes a training component and is part of new student orientation.

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

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19 Designation of responsible employee and adoption of grievance procedures, 14 C.F.R. § 1253.135(b).
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,” (Education Manual) provide guidance on some of the basic components of effective grievance procedures. 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.

A review of the University’s web site, as well as the data submitted by the University found no specific Title IX grievance procedures. Rather, the University has a “Standard Practice Guide,” (formal policy) titled, “Grievance Procedures and Dispute Resolution” which covers staff and some faculty. The Standard Practice Guide is general in nature and does not mention Title IX or any other federal or state law.

The OIE has a web site that describes the discrimination and discriminatory harassment resolution process, including informal and formal stages, and has a page called “Filing a Complaint.” This information pertains to complaints of discrimination or discriminatory harassment filed by students, faculty or staff against another University faculty or staff member.

The OIE web site is not, and does not reference, an official procedure manual in the form of a Standard Practice Guide. The information contained on the web site does, however, include detailed procedures on the formal stage of the process. The informal stage is addressed in two paragraphs which provide descriptive information but do not actually lay out the process, or processes, to be followed at the informal stage.

The OIE web site does not provide timeframes for the informal process or the various stages of the formal process. Nor does the web site inform students, faculty and staff that they may file a complaint of discrimination or discriminatory harassment externally with the U.S. Department of Education’s Office of Civil Rights, or another Federal agency providing financial assistance to the University, within a prescribed timeframe. As stated above, the DOJ Q&A recommends that agencies provide this information to beneficiaries.

The OIE web site does not reference the process for a student to file a complaint against another student. This process resides with the Office of Student Conflict Resolution (OSCR). The OSCR web site includes a Statement of Student Rights and Responsibilities. According to the Statement, students have the right to be treated fairly and with dignity regardless of characteristics such as gender. The Statement includes a section titled, “Procedures,” which describes the process to be used in response to behavior inconsistent with the values of the University, as defined in the Statement. The Statement can be viewed as including grievance procedures for students, staff, and faculty who allege gender discrimination by a student, although again, it is not in the form of a University Standard Practice Guide.

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20 This document is accessible through the U.S. Department of Education at http://eric.ed.gov/
2. Recommendations

(a) Ideally, the University should formalize its grievance procedures for students alleging discrimination/harassment by faculty or staff in the form of a Standard Practice Guide, similar to Standard Practice Guide 201.8. At a minimum, the OIE web site needs to be revised to lay out the steps of the process at the informal stage, define the timeframes at the formal stages and a student’s right, under Title IX, to file externally with a Federal agency, whether the U.S. Department of Education Office for Civil Rights or other Federal agencies providing financial assistance to the University, within the prescribed timeframe.

(b) OIE should include on the web page, “Filing a Complaint,” a reference to the OSCR process for students complaining against other students, as OIE has done on its web page titled, “Where to Get Help.” Similarly, the Campus Commitment web page also titled, “Where to Get Help,” should include a more prominent reference to the OSCR and the OSCR process for students alleging discrimination or discriminatory harassment against other students.

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.23

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.24 The U-M Title IX Coordinator informed NASA that he had distributed NASA posters and brochures providing information on Title IX and other civil rights laws to the College of Engineering. However, during the review, NASA did not find the NASA brochures displayed in the building that houses the AE Department.

Also, in support of the Campus Commitment initiative, the University printed 10,000 copies of two posters (5,000 each) for distribution on the campus. Neither poster contains any reference to Title IX or to the Title IX Coordinator. However, both posters have identical text containing the following language:

Creating and sustaining a welcoming climate requires mutual respect for all. And that means discrimination and harassment are not acceptable at the University of Michigan [emphasis in original].

23 Dissemination of policy, 14 C.F.R. § 1253.140.
24 Public dissemination of Title VI information, 28 C.F.R. § 42.405(c).
The posters contain a telephone number to an anonymous help line. The telephone number listed is an OIE number. OIE dedicated one of its lines to be answered, “Campus Commitment.” The posters also contain a web site address, which leads to a page briefly describing the program. The Campus Commitment web site also contains the University’s Non-discrimination Statement, which does reference Title IX of the Education Amendments of 1972.

Despite the Title IX Coordinator’s numerous efforts, the students interviewed by NASA were generally not aware of Title IX or the University grievance procedures, although a number of the students interviewed stated they could find the information on the internet if necessary.

2.  **Recommendation**

The *Campus Commitment* posters, or another communications vehicle, should contain a reference to Title IX and/or the Title IX Coordinator, including the Title IX Coordinator’s name, address, and phone number.

**D. Title IX Self-Evaluation**

1. **Compliance Assessment**

The NASA Title IX regulations required recipient institutions to conduct a Title IX self-evaluation by September 29, 2001.25 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.

The Title IX Coordinator informed NASA that the University no longer maintains the self-evaluation plan, which would have been conducted prior to his tenure. However, NASA considers the AE Department to have conducted a very thorough Title IX self-evaluation through its response to information requests for this compliance review. The University gathered and synthesized significant amounts of data, including statistical data by gender, in the areas of admissions, enrollment, and student retention, as well as extensive information on policies and procedures.

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25 Self-evaluation, 14 C.F.R. § 1253.110(c).
2. **Recommendation**

NASA recommends that the AE Department periodically review admissions, enrollment and retention data such as that collected in response to NASA’s Title IX review, to examine trends and potential deficiencies in women’s participation in the AE program.

**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.\(^{26}\) Consistent with this requirement, NASA examined male and female participation rates at the undergraduate and graduate level in the areas of admissions, acceptances, enrollments, graduate fellowships, research assistantships, and degrees awarded.

   (a) **Undergraduate Students**

   The University has a number of innovative outreach and retention programs designed to increase the number of female science and engineering students, and assist in helping freshman with the challenges often associated with these fields. For example, WISE reaches out to thousands of K-12 students through its programs (see Promising Practices section below). However, NASA notes that neither the University nor the AE Department appear to have mechanisms in place to effectively track the impact of these programs on female enrollment. To address this, the Associate Dean has recently challenged WISE to evaluate the return on investment of its outreach programs.

   In academic year 2005-2006, 16 percent of the 274 undergraduate students in the AE Department were female. The Associate Dean of the College of Engineering told NASA that this percentage is lower than they would like it to be. He believes that 30 percent is needed to achieve a “critical mass.”\(^{27}\) However, he believes the University’s AE Department compares well to the colleges regarded as peer institutions. He added that the AE Department has increased the percentage of female faculty from seven to 14 percent.

   The numbers and percentages of undergraduate females in the Program peaked in academic year 2002-03 at 24 percent (see Table 1 below). In academic year 2005-06, there were 43 female students enrolled in Aerospace, compared to 46 female AE students in 2001-02, despite an increase in overall AE enrollment (plus 59 students). In fact, the percentage of female undergrads in AE in 2005-06 was at its lowest point of the entire five year period. U-M officials theorized on the reason for the 2003 peak and subsequent decline of female students. One faculty member pointed out that these percentages may reflect the normal fluctuations of a small sample. Another faculty member theorized that following the terrorist attacks of September 11,
2001, research funding became more defense-oriented, which generally, in this faculty member’s opinion, may be less appealing to females.

**Table 1. Aerospace Engineering Undergraduate Enrollment by Gender**

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Number of Males</th>
<th>Number of Females</th>
<th>Percentage Male</th>
<th>Percentage Female</th>
<th>Total Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001-2002</td>
<td>170</td>
<td>46</td>
<td>79 %</td>
<td>21 %</td>
<td>215</td>
</tr>
<tr>
<td>2002-2003</td>
<td>197</td>
<td>61</td>
<td>76 %</td>
<td>24 %</td>
<td>259</td>
</tr>
<tr>
<td>2003-2004</td>
<td>188</td>
<td>56</td>
<td>77 %</td>
<td>23 %</td>
<td>244</td>
</tr>
<tr>
<td>2004-2005</td>
<td>202</td>
<td>41</td>
<td>83 %</td>
<td>17 %</td>
<td>243</td>
</tr>
<tr>
<td>2005-2006</td>
<td>230</td>
<td>43</td>
<td>84 %</td>
<td>16 %</td>
<td>274</td>
</tr>
</tbody>
</table>

Source: University of Michigan

Women’s participation in AE appears stronger, to some extent, when examining the percentage of bachelor degrees awarded. During the five academic years reviewed, the percentage of women receiving degrees ranged from a low of 17 percent in 2001-02 to a high of 30 percent the following academic year (see Table 2 below).

**Table 2. Aerospace Undergraduate Bachelor Degrees by Gender**

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Number of Males</th>
<th>Number of Females</th>
<th>Percentage Male</th>
<th>Percentage Female</th>
<th>Total Degrees</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001-2002</td>
<td>49</td>
<td>16</td>
<td>75 %</td>
<td>26 %</td>
<td>65</td>
</tr>
<tr>
<td>2002-2003</td>
<td>76</td>
<td>16</td>
<td>83 %</td>
<td>17 %</td>
<td>92</td>
</tr>
<tr>
<td>2003-2004</td>
<td>64</td>
<td>28</td>
<td>70 %</td>
<td>30 %</td>
<td>92</td>
</tr>
<tr>
<td>2004-2005</td>
<td>84</td>
<td>18</td>
<td>82 %</td>
<td>18 %</td>
<td>102</td>
</tr>
<tr>
<td>2005-2006</td>
<td>69</td>
<td>19</td>
<td>78 %</td>
<td>22 %</td>
<td>88</td>
</tr>
</tbody>
</table>

Source: University of Michigan

Students must first be accepted into the College of Engineering (CoE) in order to major in AE. NASA’s analysis of data supplied by the University showed that even though the application rate of female high school seniors was substantially less than that of males, the admitted rate of females into the CoE was consistently higher than that of male applicants (see Table 3 below). The percentage of admitted students of both genders who actually enrolled was generally similar. Thus, it appears the low number of females in the CoE is primarily a result of the low numbers applying to the College.

As part of its compliance assessment, NASA also examined the distribution of scholarships and fellowships allocated to undergraduates, by gender, in AE. While women averaged fewer dollars per scholarship prior to the 2005-2006 academic year, a higher percentage of women each year received scholarships during the period reviewed. Overall, the data did not indicate compliance issues in the distribution of scholarships and fellowships.
Table 3. College of Engineering Applications, Offers and Enrollment

<table>
<thead>
<tr>
<th>Undergraduate Applications CoE Admit/Yield By Gender</th>
<th>AY 2001-02</th>
<th>AY 2002-03</th>
<th>AY 2003-04</th>
<th>AY 2004-05</th>
<th>AY 2005-06</th>
</tr>
</thead>
<tbody>
<tr>
<td>% Total Applications Female</td>
<td>23%</td>
<td>22%</td>
<td>21%</td>
<td>23%</td>
<td>21%</td>
</tr>
<tr>
<td>% Total Applications Male</td>
<td>77%</td>
<td>78%</td>
<td>79%</td>
<td>77%</td>
<td>79%</td>
</tr>
<tr>
<td>Female Admit Rate (Offers/Apps)</td>
<td>74%</td>
<td>71%</td>
<td>75%</td>
<td>82%</td>
<td>82%</td>
</tr>
<tr>
<td>Male Admit Rates (Offers/Apps)</td>
<td>49%</td>
<td>45%</td>
<td>52%</td>
<td>75%</td>
<td>69%</td>
</tr>
<tr>
<td>Female Yield (Enroll/Offers)</td>
<td>43%</td>
<td>40%</td>
<td>40%</td>
<td>47%</td>
<td>47%</td>
</tr>
<tr>
<td>Male Yield (Enroll/Offers)</td>
<td>47%</td>
<td>42%</td>
<td>38%</td>
<td>45%</td>
<td>45%</td>
</tr>
</tbody>
</table>

Source: University of Michigan

(b) Graduate Students

Between fall of 2001 and fall of 2005, there were a total of 1,323 applications to the graduate AE Program. Overall, 54 percent of the total applicants were offered admission. Of that total, 192 (15 percent) were female and 102 of the female applicants (53 percent) were offered admission. Thus, female admission offers were consistent with the overall admission offers.

There has been a gradual increase in the percentage of women in the graduate program from academic year 2001-02 to 2005-06 (see Table 4 below). During this period, the percentage of women has doubled from five percent to ten percent. Nevertheless, the numbers remain small.

Table 4. Aerospace Graduate Student Enrollment

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Number of Males</th>
<th>Number of Females</th>
<th>Percentage Male</th>
<th>Percentage Female</th>
<th>Total Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001-2002</td>
<td>98</td>
<td>5</td>
<td>95 %</td>
<td>5 %</td>
<td>103</td>
</tr>
<tr>
<td>2002-2003</td>
<td>85</td>
<td>8</td>
<td>82 %</td>
<td>8 %</td>
<td>103</td>
</tr>
<tr>
<td>2003-2004</td>
<td>116</td>
<td>12</td>
<td>91 %</td>
<td>9 %</td>
<td>128</td>
</tr>
<tr>
<td>2004-2005</td>
<td>119</td>
<td>15</td>
<td>89 %</td>
<td>11 %</td>
<td>134</td>
</tr>
<tr>
<td>2005-2006</td>
<td>127</td>
<td>14</td>
<td>90 %</td>
<td>10 %</td>
<td>141</td>
</tr>
</tbody>
</table>

Source: University of Michigan

NASA notes with concern that only one woman received a doctorate degree during the five year period, in 2001-02. NASA was informed, however, that two women were expected to receive their doctorates at the end of the 2006-2007 academic year.

NASA discussed selections for the graduate AE program in interviews with the Chair and several members of the Graduate Admissions Committee. According to interviewees, several criteria are used to initially screen applications, with the most weight given to grade point average (GPA), which must be a minimum of 3.3. The Graduate Record Examination (GRE) scores are reviewed for consistency with GPA. The GPA in math and science is given greater weight, and more consideration is given to the GPA of the students’ junior and senior years. Letters of recommendation are also used as “reality checks” of the GPAs. Ultimately, strong candidates
with research interests that match Departmental interests are selected. The same process was described by all interviewees. NASA found the selection process to be formal and transparent.

The AE Department has several types of financial support to offer applicants, with the most desirable form of aid being a scholarship or fellowship. A second type of financial assistance is the Graduate Student Research Assistantship (GSRA), which is given to students to work on specific research projects. The GSRA enables students to conduct research on a topic of interest to them with a highly regarded professor. Generally, graduate students seek out the professors to determine if they have any GSRAs available. Whether any particular student will be hired is the professor’s decision. Students are assertive in seeking out these positions, and more than one professor told NASA there was no difference between males and females in this regard.

A third type of assistance goes to graduate students hired as Graduate Student Instructors (GSIs). GSIs are involved in teaching undergraduates, which requires more time than that required of GSRAs. This appointment is also less desirable because it does not involve research. Graduate students who begin with GSI funding are usually converted to GSRAs as opportunities arise. NASA found that GSIs are not more likely to be female.

The University did not provide data, by gender, of students receiving the various types of funding. It does not appear that AE has a mechanism for periodically reviewing funding selections to ensure against gender disparities in terms of who is awarded fellowships, GSRAs and GSIs. However, no professor or graduate student reported gender bias in the selection of students for the different types of funding and NASA found no indication of gender bias in the funding process.

2. Recommendations

(a) NASA recommends the Department review data on financial assistance packages on a regular basis to ensure that subtle gender bias does not impact the process.

(b) The University and the AE Department should have mechanisms in place to effectively track the impact of their outreach programs on female enrollment.

3. Promising Practice

In 1980, the University of Michigan established the Women in Science and Engineering Program (WISE), as a cooperative effort between the College of Engineering (CoE) which includes the AE Department and the College of Literature, Science and the Arts. The WISE program aims to increase the number of women pursuing undergraduate and graduate degrees and careers in science, technology, engineering, and mathematics (STEM). WISE also contributes to research and evaluation on issues relating to women in STEM.

WISE conducts numerous outreach and recruitment programs aimed at K-12 students, such as the Sally Ride Science Festival, the Grace Hopper Project, Career Day Workshop speakers, the Southeast Michigan Science Fair, and Introduce a Girl to Engineering Day. WISE also conducts
outreach and recruitment aimed at undergraduate and graduate students, including workshops, lectures, and supplemental instruction.

A noteworthy program designed to encourage women in engineering and science is the WISE Residence Program (WISE RP). WISE RP is an academically supportive living/learning community for women who are interested in academic majors and careers in science, mathematics and/or engineering. WISE RP strives to support the academic pursuits of its students and to build a supportive social community. The community is comprised of approximately 100 first year women, 33 returning students who serve as Peer Mentors and Program Board Members, and four upper-class women who are Resident Advisors. Each first-year student is paired with an upper-class peer mentor and is encouraged to participate in the WISE RP study groups.

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. NASA examined academic advising and career counseling at the undergraduate and graduate levels.

(a) Undergraduate

Undergraduate advisors are randomly assigned by the AE administrative assistant. Students can request another advisor, if they so choose, and these requests are automatically granted. NASA was told that relatively few students avail themselves of this opportunity. No one interviewed was aware of any differences based on gender in those who have requested a different advisor. NASA was informed that student experiences with advising varied. For example, one student indicated that she felt some professors gave the least amount of time possible with their advisees. However, she did not believe this was associated with the gender of the student. On the other hand, the head of the Engineering Advising Center (EAC) was complementary in her observations about the advising provided by the AE Department to their undergraduates.

(b) Graduate

NASA interviewed the AE professor who advises most of the incoming graduate students, averaging between 40 and 50 students per academic year. The number is lower after the first semester when students select their formal advisors. NASA noted that some professors advised more female students than others and inquired as to why this was the case. One explanation offered was that some engineering disciplines attract more women than others. For example, space flight mechanics, which involves planning and operating space missions, draws more interest from females. Another explanation offered was that when the number of women reaches a “critical mass” in a particular research area, more women tend to gravitate toward that area.

28 Counseling and use of appraisal and counseling materials, 14 C.F.R. § 1253.425.
2. Promising Practices

(a) The CoE has established the EAC to “support first-year and undeclared students in their transition from high school to the rigorous academic demands of the CoE. The Center fosters success by assisting students in the development of their academic plans and career goals, as well as their personal decision making.”

(b) Requests for new advisors are granted automatically to undergraduate students, with no questions asked. Although NASA did not hear that the practice was used by students to avoid gender bias, it could operate for that purpose.

G. Academic 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. 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.

(a) Classroom Experiences and Research Participation

NASA found that classroom experiences in the AE Department were generally similar for female and male students. As one AE professor noted, there are women who are at the top of the class and women who are struggling, the same as with the male students. In addition, the AE Department is taking proactive steps to ensure that its courses are designed to appeal to a more diverse student body. For example, several engineering faculty members are involved in designing courses with a service-based component as a way to attract more female students. NASA notes with concern, however, that their work was generally not known by other AE faculty and has had little impact on the overall AE curriculum.

The current AE Chair expressed his desire to create a more supportive climate within the Department for all students. When he began his tenure in 2005, he met with the University’s Director of ADVANCE, a program funded by the National Science Foundation, primarily to examine issues of gender equity and to increase the number of female faculty in science and engineering. Among the issues the ADVANCE Director relayed to NASA about her meeting with the AE Chair was the need to ensure that female students were not isolated in engineering courses, for example, in group work, and that women were not more likely than men to be assigned the role of note-takers. To address this issue, the ADVANCE Director advised the AE Chair that when groups were composed at least two women, if available, should be assigned together. She also suggested that faculty and teaching assistants needed to be alert to the gender

29 Education programs or activities, 14 C.F.R. § 1253.400(a), (b)(7).
30 Enforcement procedures, 14 C.F.R. § 1253.605.
dynamics in the groups and suggested that they might utilize various campus resources for ideas about how to address such issues (see “Promising Practices” below).

One AE professor told NASA that he pays attention to student preferences regarding formation of groups or teams, but ultimately assigns the students. He added that males and females are equally likely to lead teams, and he had not observed any differences in team leadership on the basis of gender. This observation was voiced by other faculty members interviewed. Students also indicated that team leadership tended to be a matter of personality rather than gender.

NASA learned about a recent incident that took place in an aircraft design course in which female students felt that male students on a research team were not “respecting their opinion.” Part of the concern of the female students was that the team leader was not performing effectively. After discussion between faculty and the team on the issues, the female students were satisfied that the problems were resolved.

(b) Overall Academic Environment

During interviews with faculty, staff and students, NASA heard about certain tensions within the AE Department that may be negatively impacting the overall academic environment. Although the information provided was anecdotal in nature, some of what NASA heard raised concerns. For example, a student interviewee informed NASA that a former female doctoral student left the program because of a problem with her research advisor. The student interviewee expressed the opinion that the problem was “definitely” because of the doctoral student’s gender. While this student appeared emphatic in her belief, other students familiar with the departure declined to offer their opinions as to the reasons for why the doctoral student left the program. Nonetheless, NASA’s concern is heightened because U-M data show that only one female student earned a doctoral degree during the five year period being reviewed.

During interviews, NASA learned of personality conflicts that may negatively affect the academic environment in the AE Department. One faculty member with extensive expertise in women’s experiences in science and engineering stated that a major obstacle to gender equity in these fields (not specific to AE) is “toxic personalities.” This faculty member described such personalities as usually being long-time professors who were used to doing things “a certain way,” and who tended to have “stereotypical notions” about women in science and engineering. The faculty member noted that these personalities, when not checked, can cause “self-doubt” and in some cases departure of women from the program.

According to this faculty member, there has been a need for “intervention” with junior faculty of both sexes in various science and engineering departments, including AE, who find it difficult to deal with these “toxic personalities.” NASA notes that behaviors associated with such personalities can contribute to a university science or engineering department having the kind of “chilly climate” described in the NRC report (see I.C.2. above). Further, reports from several students and faculty members indicate that the behavior has had a less-than-desirable impact on

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31 NASA does not mean to imply that the NRC report was referring to the University of Michigan in its discussion of the “chilly climate” phenomenon. The NRC Report did not name the four universities it examined and NASA does not know their identities.
the academic environment for some students and on the professional environment for some faculty members. The AE Department faculty members who described observing or experiencing first-hand such behavior noted that it was “equal opportunity” in nature, and not directed toward individuals based on gender.

However, NASA is concerned about the possible differential impact this type of behavior may have on female students. According to the NRC report referenced above, “[i]f women graduate students are having more negative experiences in graduate school than those faced by men, they may be more inclined to leave.”32 Thus, if female students are, for example, sometimes isolated on teams or believe that their opinions are not being respected, and additionally must deal with difficult personalities within the department, the personality issue may have a greater impact on women than men, who do not also have to deal with these other kinds of negative experiences.

2. Recommendations

(a) The AE Department should take proactive steps to encourage all faculty to integrate modified course designs and teaching styles into their classrooms.

(b) The AE Department should continue its efforts to address climate issues with the Department. For example, the AE Department should utilize the results of the climate survey requested by the Chair in 2005 to make improvements. In addition, the AE Department should continue to work with ADVANCE, WISE, and other University resources to address climate issues.

(b) The AE Department should recommend sexual harassment and gender bias training such as that provided by the University’s Center on Research, Learning and Teaching (CRLT) “Gender in the Classroom” sketch for all faculty (see “Promising Practices” below).

3. Promising Practices

(a) The Undergraduate Research Opportunity Program (UROP) was one of several campus initiatives created in the late 1980s to improve the retention and academic achievement of underrepresented students at the University. The program creates research partnerships between first and second year students and U-M faculty. The Program started with 14 student/faculty partnerships and continues to grow. Today, approximately 900 students and over 600 faculty researchers are engaged in research partnerships. UROP also provides academic support services from peer advising to career planning, and learning skills workshops. NASA notes that female undergraduates are well-represented in the UROP.

(b) The CRLT is dedicated to the support and advancement of learning and teaching at the University of Michigan. It is aimed at faculty and Graduate Student Instructors (GSIs). Staff at the Center work collaboratively with faculty, GSIs, and the academic administration to develop a University culture that values and rewards teaching, respects and supports individual differences among learners, and encourages the creation of learning environments in which diverse students can learn and excel. Overall, CRLT has a staff of 21 employees, plus 15 graduate students. It

32 NRC Report, Chapter 3, p. 54.
receives a budget of up to $1.4 million with funds from individual U-M Schools and Colleges, for a total budget of $2.2 million.

(c) The CRLT, at the request of the CoE, has established a branch to specifically work with engineering students. CRLT has hired two engineers with doctorates to serve as the primary professional staff for the engineering branch.

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. 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.

NASA reviewed the pregnancy leave and child care policies of the University. In CoE, student requests for childbearing/dependent care are handled informally by individual departments. NASA was told by the Title IX Coordinator that because of the informal nature of the requests and the decentralized operation of the College there are no data on the number of graduate engineering students approved for student leaves for pregnancy since the 2001-2002 academic year. However, the Title IX Coordinator stated that he was not aware of any student being removed from an academic program in CoE for failure to progress because of childbearing.

University officials described to NASA concerns pertaining to parental and marital status. For example, one official stated that graduate students generally feel unsupported on issues concerning family. This official believes that family issues are clearly more of a concern for women than men, and stated that this is one of the reasons for the low numbers of women in science and engineering. Similarly, another official cited difficulties for women in balancing family and work and the hardships faced by women who have children while in graduate school.

In response to questions from NASA, several of the female students interviewed shared their views on family-related matters. One AE graduate student told NASA that if the University had affordable child-care service it would help immensely. She said that this was very important for graduate students. This student told NASA that graduate students can take leave of up to six months for pregnancy. Another female AE graduate student said that balancing family and career is an issue for female students since having a child would require taking time off. She said that she did not plan to have any children until she was secure in her position. A female undergraduate in AE told NASA that she intended to work before studying for her doctorate and intended to look for a company that has flexible scheduling and allows part-time work in order to accommodate child-rearing.

33 Marital or parental status, 14 C.F.R. § 1253.530.
The Title IX Coordinator reported a wide variety of family-friendly policies at the University focusing on child and health care needs, that enable faculty and students to balance family, academic, and work life (see “Promising Practices” below). While the University provided extensive information on its family-friendly policies in response to NASA’s information request, U-M was unable to provide complete data on the number of child care tuition scholarships or grants provided. The University was also not able to provide data regarding the number of CoE student requests for childbearing or dependent care leave requests.

2. **Recommendation**

The University should develop a tracking system for requests pertaining to its family-friendly programs to better ensure transparency in the processes associated with these programs.

3. **Promising Practice**

Overall, the University demonstrates a strong commitment to family-friendly policy. For example, there is a need-based Child Care Subsidy program and need-based Child Care Tuition Grant Program. The University offers family housing for students with children, and on-site daycare. The University offers a Work/Life Resource Center that provides services and resources to assist faculty, staff, and students during pregnancy and in obtaining child care and flexible work schedules. The University also has family friendly programs for students including permitting graduate students to take up to one year leave of absence for childbearing and dependent care.

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.

Students interviewed generally regarded the University as a safe place, although they take common sense precautions, such as not walking late at night. An AE female graduate student said that she finds North Campus (where the AE Department is located) to be especially safe. She pointed out that campus buses run until midnight, and there is an after-hours transportation service provided by Ann Arbor that can be called that will take students where they need to go. In general, students agreed that the University is doing more than enough to ensure their physical safety while on campus (see “Promising Practices” section below).

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\(^{34}\) Education programs or activities, 14 C.F.R. § 1253.400(b)(7).
2. Promising Practices

(a) The U-M commitment to safety includes a variety of practices such as: ensuring a sufficient number of campus police, posting safety messages in the dormitories, training resident advisors on safety, and providing night-time escort services. Graduate students having to work into early hours of the morning are provided reserved parking spots or special parking permits to park close by their lab or building. In addition, U-M utilizes swipe cards, surveillance cameras, and lighted paths with emergency phone boxes.

(b) The University’s Department of Public Safety (DPS) publishes a 38-page Campus Safety Handbook. This document provides a quick reference guide on a variety of topics such as medical and counseling services, transportation resources, assault awareness, and workplace violence. DPS has a web page that includes all of this information.

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

The University has sexual harassment policies for students and policies for faculty and staff. The University’s policy for faculty is embodied in a Standard Practice Guide for “All Regular and Temporary Faculty and Staff Members” that prohibits sexual harassment by University employees. The eight-page Guide covers a wide variety of topics including definitions, consensual relationships, procedures, informal and formal investigations, university action, appeal process and reporting requirements. Title IX is mentioned in the policy as one of the sources that prohibits sexual harassment.36

NASA notes, however, that the Standard Practice Guide has not been updated since 1993. The Standard Practice Guide appears to be outdated by referencing an Interim Policy on Discrimination and Discriminatory Conduct by Students in the University Environment,37 originally issued in 1989. The interim policy has been superseded by the Statement of Students Rights and Responsibilities (previously described at II.B.1.). The Guide is also outdated in other respects (see Recommendation 2.a. below).

Policies for students are issued by the Office of Student Conflict Resolution (OSCR). In the OSCR Statement of Student Rights and Responsibilities, sexual harassment is specifically listed as one of several behaviors that “contradict the values of the University community and are subject to action.”38 The University’s Division of Student Affairs (DSA) web site contains a

35 Education programs or activities, 14 C.F.R. § 1253.400(a), (b)(7).
37 Ibid., p.1.
38 The Statement is accessible at: http://www.studentpolicies.dsa.umich.edu/statementstudentrights.htm; see p.2.
The University's Sexual Harassment Policy, which was updated on June 1, 2004, appears to be based on the Standard Practice Guide. However, it also references the outdated interim policy, rather than the Statement of Students Rights and Responsibilities.

According to the University, students also receive a pamphlet at new student orientation titled It's All about Respect, which is part of the University’s educational campaign aimed at preventing sexual harassment. The pamphlet contains guidance on understanding what sexual harassment is, how to prevent and resolve it, intervention strategies, and resources.

It appears the University has a complex system of policies and procedures addressing sexual harassment, due, at least in part, to the bifurcation between policies for students and policies for employees. The complexity of the system may be daunting for an individual student attempting to engage the process. A simple explanation of the various procedures, and the distinctions between them, needs to be effectively communicated (see Recommendation 2.c. below; see also the recommendation at II.B.2.b. above).

The Title IX Coordinator reported that neither of OIE’s predecessor offices had a systematic method for collecting information about sexual harassment complaints. It appears, based on the University’s response to NASA’s information request, that OIE does not maintain this data either. According to the Standard Practice Guide prohibiting sexual harassment by University employees, the “Affirmative Action Office” has the responsibility to “prepare annual statistics reports for the University community.”

The University reported that to the “best of its knowledge,” OIE has received one sexual harassment complaint from the CoE since 2003. It was brought by a female AE graduate student against a professor in another CoE department. OIE determined that even if the allegations were true they would not have constituted sexual harassment.

NASA received statistical data from the OSCR regarding the number of sexual discrimination (including sexual harassment) grievances by undergraduate and graduate engineering students. The OSCR received an average of two sexual discrimination grievances per year from the CoE, during the period reviewed.

NASA talked with several female students about whether they had experienced sex discrimination. An undergraduate AE major reported that she and a female classmate believed that they were sexually harassed by a male classmate. She described how when working with this male classmate on a research team, he would touch their knees, poke her dimple, and stroke the other female student’s hair. She and the other female student approached him and told him to stop. The interviewee also said that she went to the EAC, which told her to document the incidents. The advisor gave her options on how to handle the situation. For example, he advised them to confront the male student in front of the rest of the research group (four males). This worked and the sexual harassment stopped.

Aside from this instance, NASA heard about a generally positive environment. One female AE student reported that in her experience at U-M, relations between males and females have always been respectful and professional. Another female AE student told NASA: “Guys do not make inappropriate comments or [do] anything disrespectful.” Finally, the Director of WISE stated that as an official “complaint receiver” she occasionally hears about “boorish behavior” but that it does not rise to the level of sexual harassment, in her estimation.

2. Recommendations

(a) Standard Practice Guide 201.89 and the DSA document Sexual Harassment Policy need to be updated, since the referenced “Interim Policy” has been superseded by the Statement of Students Rights and Responsibilities. Also, the Standard Practice Guide references the “Affirmative Action Office,” as the office that handles complaints for faculty and staff. This should be replaced with the Office of Institutional Equity in the Standard Practice Guide as it has been in the DSA Sexual Harassment Policy. Additionally, the Guide and the Policy should prominently provide the names and addresses of state and federal agencies where complaints of discrimination or harassment can be filed, as recommended by DOJ’s Q&A guidance document.

(b) OIE should systematically track allegations of sexual harassment and other types of gender discrimination against University employees, in order to document resolution and monitor trends.

(c) OIE should include links on its “Non-Discrimination Policy Notice” web page to the Statement of Students Rights and Responsibilities and the Sexual Harassment Policy for students. It also would be helpful for OIE to provide brief descriptions for each of the policy document links shown.

3. Promising Practices

(a) The OIE has a web page dedicated to sexual harassment issues. There are links on this page to definitions of prevention, intervention, and resolution; an on-line tutorial; how to respond to sexual harassment; and additional resources.

(b) The CRLT has developed 18 short plays, which use professional actors, and are aimed at generating dialogue on gender issues among graduate students and faculty. CRLT has sketches for mentoring, faculty meetings, faculty searches, and the tenure decision-making process. Among the sketches they regularly perform is “Gender in the Classroom,” which treats issues of gender bias that may arise in the classroom setting. Following performance of the sketch, there is a facilitated dialogue with the audience. The Director of CLRT stated that typically, someone in the audience will say something like, “That never happens here,” and one of the female students will respond with something like, “This is my daily life you are seeing here.” Student instructors and faculty report that the sketches have had a very positive impact on their recognition of and ability to deal with gender bias in the classroom. The CoE requires prospective GSIs to attend an orientation before assuming their teaching duties.

41 See http://www.hr.umich.edu/oie/ndpolicy.html
III. 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. Furthermore, NASA finds that the University of Michigan has many promising practices that may serve as models for increasing women’s participation in science and engineering and ensuring equal educational opportunity regardless of gender.

While NASA did not find non-compliance, there are areas of the AE Program NASA believes can be strengthened with regards to equal opportunity. Based on data provided by the University, the number of women in the undergraduate AE Program did not increase during the five year period reviewed by NASA, despite the extent and variety of the University’s efforts. Also, based on anecdotal information provided during some of the interviews, NASA is concerned that certain aspects of the climate within the AE Department may be undermining the University’s progressive efforts. In the interests of assisting the University to enhance equal opportunity in its AE Program, NASA provided a number of recommendations, including several to address climate concerns.