

A QUALITATIVE EXAMINATION OF ROLE DEFINITION, ORGANIZATIONAL
POSITIONING, AND JOB QUALIFICATIONS OF TITLE IX COORDINATORS

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Doctor of Education

by:
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The undersigned, appointed by the dean of the Graduate School, have examined the dissertation entitled

A QUALITATIVE EXAMINATION OF ROLE DEFINITION, ORGANIZATIONAL POSITIONING, AND JOB QUALIFICATIONS OF TITLE IX COORDINATORS

presented by Andrea Weber,

a candidate for the degree of doctor of education,

and hereby certify that, in their opinion, it is worthy of acceptance.

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DEDICATION

My husband, Terry Weber who is my rock, soulmate, and the person I love with
all of my heart.

My children, Landon and Peyton Weber who will grow up to know Wednesday
school nights mean so much more.

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ABSTRACT

The purpose of the study was to examine the experiences of Title IX Coordinators at a university or college. The study included three questions pertaining to role definition, organizational positioning, and job qualifications of Title IX Coordinators. The design was a qualitative study with a phenomenological approach. The methods for the study included interviewing twelve Title IX Coordinators across the Midwest, observing two of the twelve Title IX Coordinators, and obtaining artifacts such as job descriptions and organizational charts. The themes reflected within the findings encompass areas such as compliance focused, Office of Civil Rights ambiguity, supervision reporting lines, structural considerations, education, qualifications, skills, and training. Recommendations for practice are offered to both the Office of Civil Rights and universities/colleges.

CHAPTER ONE
INTRODUCTION TO DISSERTATION

Background

When Title IX was passed in 1972, the main focus was on sexual discrimination in educational programs. Title IX originated as a law that grew out of the civil rights and feminist movements stemming back as early as the 1950s (Block, 2012). While attention was originally placed on gender equality for women in regard to education, Title IX quickly changed to become a law concentrating on gender equality in athletics. In 2011, the law shifted dramatically to addressing sexual harassment, sexual misconduct, and sexual assault, more specifically, discrimination based on sex and educational activities. Equally important, the scope has broadened to encompass all genders including transgendered students. While Title IX has a strong focus on sexual assault, sexual misconduct, and sexual harassment as forms of discrimination, the law went further by addressing discrimination based on sex, which would also include pregnancy and parental status (U.S. Department of Education, 2015a).

The Office of Civil Rights (OCR), with the deliverance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), made it clear that all forms of sexual violence constituted a violation because college students have the right to be safe from sexual discrimination in an educational setting or educational activities. Title IX legislation also called for educational programming centered on the overarching theme of sexual violence. The call to action from the Dear Colleague Letter (U.S. Department of Education, 2015b) created a trail of various legislation in regard to Title IX and gender discrimination, namely sexual assault on a college campus (Block, 2012). Each piece of legislation brought new components of what a Title IX violation looked like and how a

campus should respond. Further, Title IX clearly articulated mandates, which if not met, would be punishable by fines (U.S. Department of Education, 2015c).

One imperative mandate was for each higher education institution to have one Title IX Coordinator who would devote his or her time to Title IX complaints and investigations. According to the Dear Colleague Letter (U.S. Department of Education, 2015b), institutions who receive federal financial assistance will “designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title IX” (U.S. Department of Education, 2015b, p. 6). The Dear Colleague Letter (U.S. Department of Education, 2015b) articulated, minimally, the scope of the Title IX Coordinator’s role and how each Coordinator should have adequate training. The Dear Colleague Letter (U.S. Department of Education, 2015b) does not provide any concrete job requirements, educational levels, or position definitions. Higher education institutions are struggling to understand and define this role while at the same time trying to find adequate staff to fill it.

Statement of the Problem

When Title IX was introduced in 1972, the government and higher education entities focused on gender equality in athletics (Block, 2012; Hoffman, 2011). Then, K-12 schools and higher education employed either full-time or part-time faculty or staff members as Title IX Coordinators as a means to establish fair and equal athletic practices, which were taking place on and off the field (Taylor, 2005). When the Dear Colleague letter (U.S. Department of Education, 2015b) was written, Title IX took on an entirely new role (U.S. Department of Education, 2015d). With Title IX's newly revised interpretation, students could face discrimination based on whether or not they had been

sexually assaulted, specifically when the discrimination potentially could impact students' educational rights (U.S. Department of Education, 2015a).

As a result of Title IX's multiple interpretations, the government mandated that a Title IX Coordinator be employed at every higher education institution including private, public, religiously affiliated, and community colleges (U.S. Department of Education, 2015b). The federal government provided no direction regarding the education, responsibilities, and training of this position. As such, a Title IX Coordinator whose focus lies in the protection of a students' educational interest on a college campus, when incidents of sexual misconduct occur, is a relatively new position. This dissertation will examine research in the area of sexual assault and sexual harassment, centering upon the role of the Title IX Coordinator, a government mandated university position as it is defined on a college campus. Additionally, this dissertation will examine the university structure and position qualifications.

Since the Title IX Coordinator has been mandated by the Dear Colleague Letter (U.S. Department of Education, 2015b), little to no information is known about the position outside of it being a directive from the U.S. Department of Education. The problem of practice for higher education professionals is the inability to understand how to work within unclear constraints dictated by the U.S. Department of Education. Title IX Coordinators have been in existence on a college campus originally focusing upon athletic gender equality complaints, but the existence of a Title IX Coordinator position which focuses on sexual violence and pregnancy as discrimination issues is new to college campuses (Hoffman, 2011; June, 2014). With every new position, there is no

standard job description nor direction as to where the position falls within the organizational structure.

Purpose of the Study

The Title IX Coordinator position is a fairly new position on a college campus. There have been Title IX Coordinators whose job responsibilities center upon regulating laws pertaining to athletics (Hoffman, 2011; June 2014). Until recently mandated, there have been no Title IX Coordinators whose sole responsibilities lie in regulating or overseeing sexual misconduct laws. Further, there is little to no historical documentation on when the first Title IX Coordinators, focusing on sexual discrimination, began to have positions on a college campus. Nevertheless, the position can be seen as early as a few decades ago, specifically in regard to working with equality among student athletes (Hoffman, 2011; June, 2014; Taylor, 2005). Recently, the Title IX Coordinator position became more prominent on college campuses when a call to action was made by the government in a response to the increased number of sexual assaults that have been reported. As well as the way colleges and universities were handling the sexual assault complaints students were reporting. At this time, limited research has been completed about the role, job functions, organizational hierarchy, or even the educational experience of this position.

While the government called for the establishment of a Title IX Coordinator at every college and university, there was nothing in the form of established position guidelines, procedures, funding, or support for the Title IX Coordinator or for colleges and universities which must employ one (U.S. Department of Education, 2015b). The government has determined, by law, that every college and university create this position;

however, the position requirements and specific skills needed is left to each college and university to determine what makes a successful Title IX Coordinator. Given such vague guidelines, one could ask the following questions: What education level should this person have which warrants them to be successful? How does this position fit into the overall structure of the university? Furthermore, what is the role of an effective Title IX Coordinator? This study will seek to explore all aspects of the Title IX Coordinator role.

Research Questions

There will be three research questions guiding this study. All research questions will be answered utilizing a qualitative inquiry. The research questions guiding this study are:

- (1) How is the Title IX Coordinator position defined at various institutions? (Role Definition)
- (2) Given its government mandates, how does the Title IX Coordinator position fit into the existing structure of a college or university? (Organizational Positioning)
- (3) What are the qualifications of a Title IX Coordinator (i.e., education, experience, etc.)? (Job Qualifications)

Conceptual Framework

The conceptual framework for this dissertation in practice centers upon the structural frame introduced by Bolman and Deal (2008) while integrating concepts, theories, and principles from organizational structure literature. Bolman and Deal (2008) outlined four frames which a researcher can utilize when examining an organization. The four frames are (a) structural, (b) political, (c) human resource and (d) symbolic. Bolman

and Deal (2008) explain “A frame is a mental model - a set of ideas and assumptions - that you carry in your head to help you understand and negotiate a particular “territory”” (p. 11). When utilized as a guide, these frames can be helpful for the researcher in order to create theories and make assumptions regarding an organization.

The frame which this study will focus on and utilize as a reference is the structural frame (Bolman & Deal, 2008). It is the backbone of an organization and the means to explaining how an organization operates. When thinking about a metaphor for the structural frame, it can be likened to a skeleton. The skeleton, or the structure, serves as a base which explains the inner workings. One of the inner workings of an organization is the structural configuration (Bolman & Deal, 2008). Similarly, Mintzberg (1979/2005) examined the basic parts of an organization and explains how job positions align within the organization. The basic parts of an organization, according to Mintzberg (1979/2005), are “the operating core, the strategic apex, the middle line, the technostructure, and support staff” (p. 223). The Title IX Coordinator has been mandated to each university by law; however, there is no guidance on where the position will fit into the university configuration. The hierarchy and organizational position of the Title IX Coordinator within the university structure has not been mandated but left to the educational institutions' choices.

Bolman and Deal’s (2008) structural frame also considers how an organization is coordinated. An organization can be coordinated either vertically or laterally (Bolman & Deal, 2008, p. 54). Within an organization’s coordination are tenets which speak to the work of employees. The Title IX Coordinator was not defined by the Department of Education; rather educational institutions need to make decisions regarding the position

variables. Conversely, the Department of Education has ultimately granted authority to the Title IX Coordinator outside the university's scope. Authority, whether formal or informal, needs to be established so that a hierarchy can be established as well.

Hierarchy is equally important as it explains to a community the political operations of an organization; hierarchy includes the "systems that allow organizations to hold people accountable for getting assigned work done" (Jaques, 1990/2005, p. 233). Traditionally, organizations, including institutions of higher education, will utilize an organizational chart to depict hierarchy; however, the reality that takes place within an organization is not always encapsulated in such a chart. Mintzberg (1979/ 2005) argued that while an organizational chart is important to study such a chart may provide context and division of work, but the organizational chart may not articulate the informational relationships or inner workings of the organization.

When examining the structural frame within an organization, there is a parallel between authority and power (Bolman & Deal, 2008). While a person in a specific job position has authority due to his or her role, he/she also has power as a person. As Bolman and Deal (2008) reasoned, "Power in organizations is basically the capacity to make things happen" (p. 196). The concept of power can be utilized to assess the definition of a job within the structure of an organization as well as the job qualities (i.e., education, experience). Additionally, where the position is placed within the overall organizational hierarchy said position can be an indication of power as well. The supervision reporting lines could also indicate some level of power. French and Raven (1959/2005) discussed their bases of power which can be attributed to varying factors;

their bases of power can be applied as a theory as to why a person in a certain position has the power he/she does.

Bolman and Deal (2008) discussed basic structural tensions that design an organization. For instance, “differentiation versus integration” (Bolman & Deal, 2008, p. 52). There is a certain division of workload as well as being able to articulate the roles of each position within the organization. These concepts ask the questions related to what type of leader the professional wants to be and what type of leader the professional want to be in the organization? Differentiation versus integration answers the questions of how a position will be established within an organization. In other words, what type of duties will be given to a professional in his/her job and how will the professional work to complete the job those duties (Bolman & Deal, 2008).

Design of the Study

Methodology

This research will be a qualitative study with a phenomenological approach. The phenomenological approach was chosen as it enables the researcher to understand human experiences (Creswell, 2009). Since this study will be examining a job position which deals with human experiences, utilizing a phenomenological approach will also help to understand how this experience translates into a shared experience (Merriam, 2009).

Phenomenological Approach

A phenomenological approach taken in a qualitative study seeks to understand the commonalities of human experiences. Specifically, the researcher is seeking to understand what the participants have in common as they are experiencing a phenomenon (Creswell, 2013). The researcher is attempting to understand the lived experiences of the

participants by directly utilizing the participants as an instrument. The phenomenological approach in qualitative research has roots in philosophy as the approach "...suspends all judgement about what is real" (Creswell, 2013, p. 77). Furthermore, a suspension of judgement is crossed with "this idea...that consciousness is always directed toward an object" (Creswell, 2013, p. 77). Coupled with this philosophical tendency is the scientific methodology. For example, there are elements of natural science which refer to sensations and also human sciences which refer to perception and judgement (Moustakas, 1994).

The ultimate goal in a phenomenological approach is to describe the essence of an experience (Merriam, 2009; Moustakas, 1994). Regardless of a phenomenological approach being about essence, there is still a sense of the concrete world (Moustakas, 1994). The hallmark of a phenomenological study, which aids in illustrating the essence of the study, is the interviews that take place (Moustakas, 1994). Within a philosophical context which is balanced by a science perspective, there is an element of researcher experience. Furthermore, according to Moustakas (1994), "in phenomenological science a relationship always exists between the external perception of natural objects and internal perceptions, memories, and judgements" (p. 47). The researcher brings her own experiences to the study and must recognize this as an assumption. Nevertheless, the researcher should use the research question(s) to guide the study and not utilize assumptions (Moustakas, 1994). After the study has been published, a reader should have a complete understanding and feeling of the experiences of the participants (Merriam, 2009).

Researcher Position

Since qualitative studies involve the researcher, it is important to understand the researcher's position or bias (Merriam, 2009). The researcher admits to having some bias as this study resides in a discipline in which the researcher works. The researcher will be mindful to have self-reflection throughout the study to ensure biases and assumptions are clear (Merriam, 2009). The researcher also acknowledges that in some of the focus groups and interviews she will know the individuals personally; however, the researcher will ensure confidentiality. The researcher will achieve triangulation by conducting interviews, collecting documents which are relevant to the Title IX Coordinator position, and performing observations in order to reach saturation (Merriam, 2009). The researcher acknowledges a certain level of insider status given the interviews will be collected utilizing the membership database via the professional association in which the researcher has membership (Drake & Heath, 2011). As this study will center on a phenomenological approach, the researcher will ensure bracketing of her own experiences. Bracketing is an approach where the researchers set aside their own experiences to understand those of the participants (Creswell, 2009).

Participants and Setting

Interview participants will first be chosen utilizing a convenience sample model (Fink, 2013). Ten Title IX Coordinators will be interviewed for this research study. The ten Title IX Coordinators will be from the Midwest. The Title IX coordinators work at varying institutions which include: (a) public universities, (b) private universities, (c) community colleges, and (d) religiously affiliated colleges. Since the area of the country the researcher will focus on provides access to ten coordinators who work in one state, it

is convenient to use this sampling method. Additionally, when conducting a phenomenological qualitative study, it is recommended to interview between five to 25 participants (Creswell, 2013). The Title IX Coordinators interviewed will have a range of educational experience and work experience. Additionally, the Title IX Coordinators may not have sole job responsibilities in the Title IX area. The Title IX Coordinators will be emailed and called asking for their participation.

Of the ten Title IX Coordinators who will be interviewed, four of them will be observed for no more than four hours within one day. The Title IX Coordinators who will be observed will work at (a) a midsize public university, (b) small private university, (c) a community college, and (d) a religiously affiliated private college. Once again, due to the area of access the researcher has convenience sampling will be utilized.

A semi-structured interview guide (see Appendix A) will be used for all of the interviews and focus groups (Merriam, 2009). An informed consent form (see Appendix B) will be created to inform participants of their risks if they chose to participate in the study. It will also inform the participants of the purpose of the study, time commitment, risks, benefits, and confidentiality (Merriam, 2009). The informed consent form will be utilized for interview and observation participants. A participant identifier table (see Appendix C) will be created to organize data.

Data Collection Tools

This study will explore the experiences of Title IX Coordinators across the United States on a college or university campus. It will be an exploratory approach with a phenomenological design (Creswell, 2009). The researcher seeks to understand the experiences of the Title IX Coordinators as described by the participants (see Table 1).

Human Subjects Protection

The researcher will apply for and obtain human subjects protection through the University of Missouri (MU) Institutional Review Board (IRB). The researcher will defer to MU for their policies and procedures. Furthermore, the researcher will apply for and obtain human subjects protection through the institutions at which data (observations) will be collected. Additionally, the researcher will ensure confidentiality of all participants. Confidentiality will be maintained by only identifying type of institution where the data is collected. Each participant will agree to the informed consent form. Data which will be collected electronically, will be kept on the researcher's computer and is password protected.

Table 1

Data Collection Tools

Setting	Participants	Data Collection Tool
Two-year public college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log
Four-year public college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log
Four-year private college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log
Religiously affiliated college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log

Interviews

Ten Title IX Coordinators will be interviewed utilizing semi-structured interview protocol (Merriam, 2009). A semi-structured interview protocol (see Appendix A) provides a pre-existing set of questions while allowing for flexibility depending on how the interviewee responds. The questions will be open ended to solicit a pattern or theme once the information has been coded (Merriam, 2009). The interviews will provide a broad set of experiences as the Title IX Coordinators represent a public, private, community college, and religiously affiliated institutions in the Midwest. The interviews will take place for 60 to 90 minutes conducted at participants' office locations or via the telephone. Confidentiality will be maintained by only identifying the participants by institution type (see Appendix C).

Artifacts

The researcher will obtain from the interviewed Title IX Coordinators artifacts which are pertinent to the job outcome. Artifacts include, but are not limited to (a) copies of daily calendars and logs, (b) incident reports, (c) investigative reports, and (d) organizational charts over the span of one year. These artifacts will enable the researcher to garner a picture of what responsibilities and experiences the Title IX Coordinator position entails. Organizational charts will be the most recent version on hand. These artifacts will serve as key components within a phenomenological qualitative study as they can offer perspective on trends and insights (Creswell, 2009; Gay, Mills, & Airasian, 2006). All artifacts will be cataloged in an artifact identifier table (see Appendix D).

Job Descriptions

It will be important to acquire various job descriptions from across the United States to compare and contrast education levels, job requirements, and job duties. Job descriptions will be important to this study as they will provide data to answer the research questions. Given that the government has not provided direction in this area, it will be critical to see how each institution differentiates their job descriptions. The job descriptions should be the most current and no older than the past three years.

The researcher will examine the Human Resources Department website for job descriptions of the Title IX Coordinators who will be interviewed. If the researcher is unable to acquire the job descriptions from the website, the researcher will ask each Title IX Coordinator. The researcher will also review job descriptions of Title IX Coordinators who were not interviewed. In addition, the researcher plans to collect and analyze 10 to 20 job descriptions. All job descriptions will be cataloged in a job description identifier table (see Appendix E).

Observations

Given that the researcher has direct access to four different Title IX Coordinators, who live in close proximity to the said researcher, it would be beneficial to conduct observations; according to Merriam (2009), “observation make[s] it possible to record behavior as it is happening” (p. 119). Specifically, the researcher will be using nonparticipant observations which will likely lessen the level of researcher bias (Gay, Mills, & Airsian, 2006). For the purpose of this study, it would be helpful to observe the behavior of the Title IX Coordinators in their daily element to see how a mandated position fits into their respective university structure. Utilizing observations as a data

collection tool will provide an objective viewpoint (Gay, Mills, & Airasian, 2006). An observation protocol guide (see Appendix F) to include (a) setting, (b) conversations, (c) activities, and (d) interactions will be created (Merriam, 2009); it will also include a sketch of the physical location.

Practitioner Field Notes Log

The researcher will utilize a practitioner field notes log (see Appendix G) which will be notes from the researcher (Emerson, Fretz, & Shaw, 2011). The field notes will be reflections and summaries the researcher may glean from conversations, observations, and interpretations throughout data collection. Specifically, the researcher will seek to understand what has been observed and reflected upon through data collection which encapsulate the researcher's personal reactions (Gay, Mills, & Airasian, 2006). Utilizing a practitioner log is essential to capture the essence of the study as the researcher is the main instrument in a qualitative study (Merriam, 2009). Equally important, the practitioner's field notes log will enable the researcher to bracket her experiences as the researcher seeks to understand the participants (Creswell, 2009; Merriam, 2009).

Data Analysis

Open Coding

The researcher will initially start coding the qualitative data by seeing which patterns and themes emerge as a result of a first read (Merriam, 2009). The horizontalization process will be used by the researcher as "laying out all the data for examination and treating the data as having equal weight" (Merriam, 2009, p. 26). As suggested by Emerson, Fretz, and Shaw (2011), the researcher will underline or identify patterns or themes in the margins of the transcribed interviews. These patterns or themes

which are made up of significant statements, words, sentences, or quotes help the researcher understand how participants experience a phenomenon (Creswell, 2013). Also consistent with Merriam (2009), the coding will be as “expansive as you want in identifying any segment of data that *might* be useful” (p. 178). The themes will be moved into “clusters of meaning” (Creswell, 2013, p. 82). At this point, codes of themes or “clusters of meaning” will be identified as a way to move into focused coding (Creswell, 2013, p. 82).

Focused Coding

Once patterns or themes have been identified through open coding, the researcher will essentially focus on those patterns or themes (Emerson, Fretz, & Shaw, 2011). The identified patterns or themes will be utilized to generate what the participants experienced (Creswell, 2013). Furthermore, it will be used to aid the researcher in understanding how the participants understand the phenomenon (Creswell, 2013). A list of codes will be maintained by the researcher, and various codes will be assigned a different color. The researcher will also utilize large pieces of paper (one per pattern or theme) to create a running list of direct quotes, ideas, or concepts taken from interviews. The researcher will create a code memo to gather the emergent patterns and themes; this will also be shared with her advisor to ensure there is no researcher bias (Emerson, Fretz, & Shaw, 2011).

Limitations, Assumptions, and Design Controls

The researcher identified several limitations and assumptions regarding this study. To begin, the researcher assumes some level of bias given her current job. Equally important, the researcher assumes a level of bias given her relationship with some of the

individuals who participate in the both the interviews and focus groups. The researcher will ensure confidentiality with all participants.

The researcher chose convenience sampling for the individual interviews versus purposeful sampling (Merriam, 2009). Convenience sampling was chosen for the individual interviews because of location to the researcher. In person interviews will be conducted in a single state whereas the researcher will collect job descriptions within a nationwide cross section. The researcher admits the convenience of location when it comes to interviews. Conversely, the researcher admits to utilizing the Internet to acquire job descriptions.

Another study limitation is the researcher's ability to acquire accurate information from both the job descriptions and the organizational hierarchies. At times during this study, the researcher will utilize the Internet to acquire either job descriptions or organizational hierarchies. The researcher recognizes that while the Internet may be a quick way to access information, it might not have the most up-to-date information or provide a comprehensive context.

Throughout the course of the interviews, the researcher makes the assumption that participants are providing honest answers to questions. Specifically, there are certain Title IX Coordinators the researcher may know personally and professionally. The researcher will utilize her opening statements in the interviews to set expectations which will deter from dishonest statements. The researcher will also articulate how the study will impact future research in the area of Title IX.

While the federal government has mandated that the Title IX Coordinator position be a stand-alone position, there are still a number of participants who have duties outside

the scope of the Title IX position. The researcher assumes there will be participants who have dual job roles and may be unable to articulate between varying terms within the scope of the Title IX position. Participants who have other roles in addition to their work with Title IX may not be as focused on providing answers which pertain only to Title IX components of the job. This may skew the research question pertaining to experiences.

The researcher acknowledges the limitations associated with the artifacts which will be collected. The artifacts collected will be at the discretion of the Title IX Coordinator who provides them. While the researcher will clearly articulate which artifacts should be collected, the Title IX Coordinator will be responsible for providing the materials. Additionally, the researcher assumes the Title IX Coordinator will want to provide the artifacts.

Finally, the Title IX Coordinator, as a stand-alone position, is new to a number of institutions of higher education. Different than other jobs, the Title IX Coordinator may not currently have education or experience with the full duties related to Title IX. Given the newness of this position, data collected such as job descriptions, organizational job definitions, and organizational hierarchy charts may be limited.

Definitions of Key Terms

Dear Colleague Letter 2011

The Dear Colleague Letter (U.S. Department of Education, 2015b) which the Office of Civil Rights published in April 2011 was the basis for why the Title IX legislation was viewed in a different manner than in its 1972 introduction. The Dear Colleague Letter (U.S. Department of Education, 2015b) examined the role and

responsibility higher education institutions had when following the Title IX stipulations. This letter mandated requirements for all higher education institutions (Block, 2012).

Dear Colleague Letter 2015

This Dear Colleague Letter is the second letter published by the Office of Civil Rights regarding Title IX (U.S. Department of Education, 2016b). This Dear Colleague Letter was a reminder to all K-12 school districts and higher education institutions that there will be a Title IX Coordinator designated at each location. The Dear Colleague Letter described the responsibilities of the Title IX Coordinator, supervision models, and position visibility guidance (U.S. Department of Education, 2016b).

Office of Civil Rights

“The mission of the Office of Civil Rights is to ensure equal access to education and to promote educational excellence throughout the nation through vigorous enforcement of civil rights” (U.S. Department of Education, 2015d, para. 1). The Office of Civil Rights will issues guidance and Dear Colleague Letters as a means to help institutions grasp the required mandates. In addition, they also publish guiding documents to support their mandates (U.S. Department of Education, 2015c).

Sexual Assault

The term sexual assault can be described as “typically a onetime occurrence and is also likely to occur, at least on college campuses, in the context of social situations where cues about sexual assault are camouflaged by the campus culture” (McMahon & Banyard, 2011, p. 3). Sexual assault is a violation of another person without their consent (McMahon, 2008). Sexual assault, or rape, is defined by the state of Missouri law Mo Rev State § 566.030 as

A person commits the offense of rape in the first degree if he or she has sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. (Missouri Revised Statutes, 2016, para. 1)

Sexual Harassment

Sexual harassment is “conduct that is sexual in nature; is unwelcome; and denies or limits a student’s ability to participate in or benefit from a school’s education program” (U.S. Department of Education, 2015e, para.3).

Sexual Misconduct

Sexual misconduct is a term utilized in higher education. The term sexual misconduct is all encompassing of sexual violence, sexual harassment, sexual assault, rape, and unwanted sexual contact. Furthermore, the term sexual misconduct encompasses the behaviors outlined in the 2011 Dear Colleague Letter (Koss, Wilgus, & Williamsen, 2014).

Sexual Violence

Sexual violence can include but is not limited to: (a) dating violence, (b) stalking, (c) sexual assault, (d) rape, (e) sexual misconduct, and (f) sexual harassment. It is a term which can be interchanged in other types of violence that are sexual in nature (Rennison & Addington, 2014).

Title IX

Title IX is part of the 1972 Educational Amendments. Title IX prohibits discrimination based on sex in educational programs, specifically, those higher education institutions which receive federal funding since the clarification of the 2011 Dear

Colleague Letter. Title IX encompasses sex-based discrimination when a student is enrolled at a higher education institution has brought forward a complaint centered upon sexual misconduct (Title IX, 1972).

U. S. Department of Education

The U.S. Department of Education is the branch of the federal government which creates policies and coordinates assistance for those policies in the area of education. The U.S. Department of Education houses the Office of Civil Rights. Both entities believe college students should receive an education which is free of discrimination, including sex based discrimination (U.S. Department of Education, 2015a).

Significance of the Study

Currently, there is a gap in the research on Title IX with respect to how the law has changed to include sexual misconduct related to gender discrimination, and there is a greater gap in research on the role of the Title IX Coordinator. Further, there is limited research conducted on this role which has been published in a peer reviewed journal. A majority of the articles or documentation regarding this new role have been published within professional, field-specific discipline magazines or newsletters. Taylor (2005) has a peer reviewed article on emergence of the role of Title IX Coordinators in athletics and the evolution of that role; however, there is no further documented peer reviewed research. Given the Title IX Coordinator is now a mandated position by the U.S. Department of Education (2015b), it deems warranted that there should be documented research on this important role.

The Association of Student Conduct Administrators (ASCA) and the Association of Title IX Coordinators (ATIXA) are both eagerly wanting information regarding the

Title IX Coordinator position. Each of the aforementioned associations have a peer reviewed journal where this research is aptly suited. The journals are fairly new because the associations have fairly recently been established. This research would also help to promote these associations. The membership of these associations would benefit from the research as the members are still unclear of the job duties and job experiences of the Title IX Coordinator. Essentially, this research will be ground breaking for these associations and subsequent membership.

On any given college campus, the Title IX Coordinator position affects a number of students, faculty, and staff. Of equal importance, every college and university is mandated currently to have the Title IX Coordinator position (U.S. Department of Education, 2015b). At a number of different colleges and universities, the Title IX Coordinator position reports to the President. When a position reports to the President of a university, there is a certain level of power (Bolman & Deal, 2008). This study will help higher education institutions understand the complexities of the Title IX position and how the position can evolve for the future. Currently, colleges and universities are struggling to understand the role of the Title IX Coordinator position, so this study will provide some substantial research which will impact not only the position but also other colleges and universities.

Summary

Since the inception of Title IX in 1972, the goal was to combat discrimination based on gender in educational programs. Title IX was a law built upon the civil rights movement and feminism (Block, 2012). The first interpretations of the law centered upon gender equity in the athletic arena. In 2011, the Office of Civil Rights sent a Dear

Colleague Letter which changed the landscape of Title IX (U.S. Department of Education, 2015b; U.S. Department of Education, 2015d). The Dear Colleague Letter (U.S. Department of Education, 2015b) posited that all forms of sexual violence and sexual harassment would be a violation of a student's Title IX rights when attending an educational institution. As a result of the Dear Colleague Letter (U.S. Department of Education, 2015b), the Office of Civil Rights mandated certain procedures and policies every higher education institution must abide by such as the creation of a Title IX Coordinator (U.S. Department of Education, 2015d). The Title IX Coordinator would be employed by the higher education institution and would be the leading expert on Title IX at that college or university.

The Title IX Coordinator position, while mandated by the Office of Civil Rights, was absent of any direction offered in the Dear Colleague Letter, however; institutions have been left to determine the role of the position, the qualifications, and the organizational structure of said position (U.S. Department of Education, 2015b). Furthermore, limited research has been completed on the role of the Title IX Coordinator, specifically in the prevention of sexual violence and sexual harassment (Hoffman, 2011; June, 2014). This study will be a qualitative analysis with a phenomenological approach (Creswell, 2009). A conceptual framework stemming from Bolman and Deal's (2008) structural frame will be utilized. The researcher will interview ten current Title IX Coordinators from schools in the Midwestern area and also observe four of the ten Title IX Coordinators who will be interviewed. Additionally, artifacts will be collected.

The Title IX Coordinator role, as the leading expert in sexual violence and sexual harassment, is new to higher education institutions (Hoffman, 2011; June, 2014). There

is no precedent for education requirements nor is there a formal structure of the position. Additionally, the Office of Civil Rights has offered no guidance. This study will seek to offer some guidance in an area where a gap exists.

CHAPTER TWO
PRACTITIONER SETTING FOR THE STUDY

Introduction

There are varying levels of control and authoritative power which exists in higher education. Policies and procedures may be created at an institutional, state, or federal level. As higher education evolves, the level of involvement and intrusive nature of the federal government continues to change and become more apparent. The following section is a review of the parts which comprise the policy actors in higher education. Policy actors are those individuals who have a vested interest in certain policies (Fowler, 2008). The policy actors involved in this study include stakeholders such as the Department of Education, state departments, governing boards or trustees, faculty, staff, and students (see Figure 1). In addition, this section contains an organizational and leadership analysis of the federal, state, and local organizations that impact Title IX Coordinators. Finally, the section concludes with implications for research in the practitioner setting.

History of Organizations

Federal

The U.S. Department of Education (DOE) is an agency of the federal government which creates, administers, and enforces policies that are established by Congress. Policies are reflective of the educational initiatives of the United States President. The origins of the DOE can be traced to the Presidency of Andrew Jackson where the department would track information regarding public schools (U.S. Department of Education, 2015f). The department was formally recognized in 1979 when a purpose was declared. Throughout the course of its existence, the mission of the DOE has expanded, but the essence has not changed. The DOE seeks to “serve America's

students-to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access” (U.S. Department of Education, 2015f, para. 10).

The DOE is led by a Secretary of Education who is nominated by the United States Presidents and conferred by the Senate. An additional layer of administrative leadership is the Deputy Secretary. Within the DOE, there are numerous offices which help construct policies, recommendations, and initiatives which are driven by the President’s education priorities.

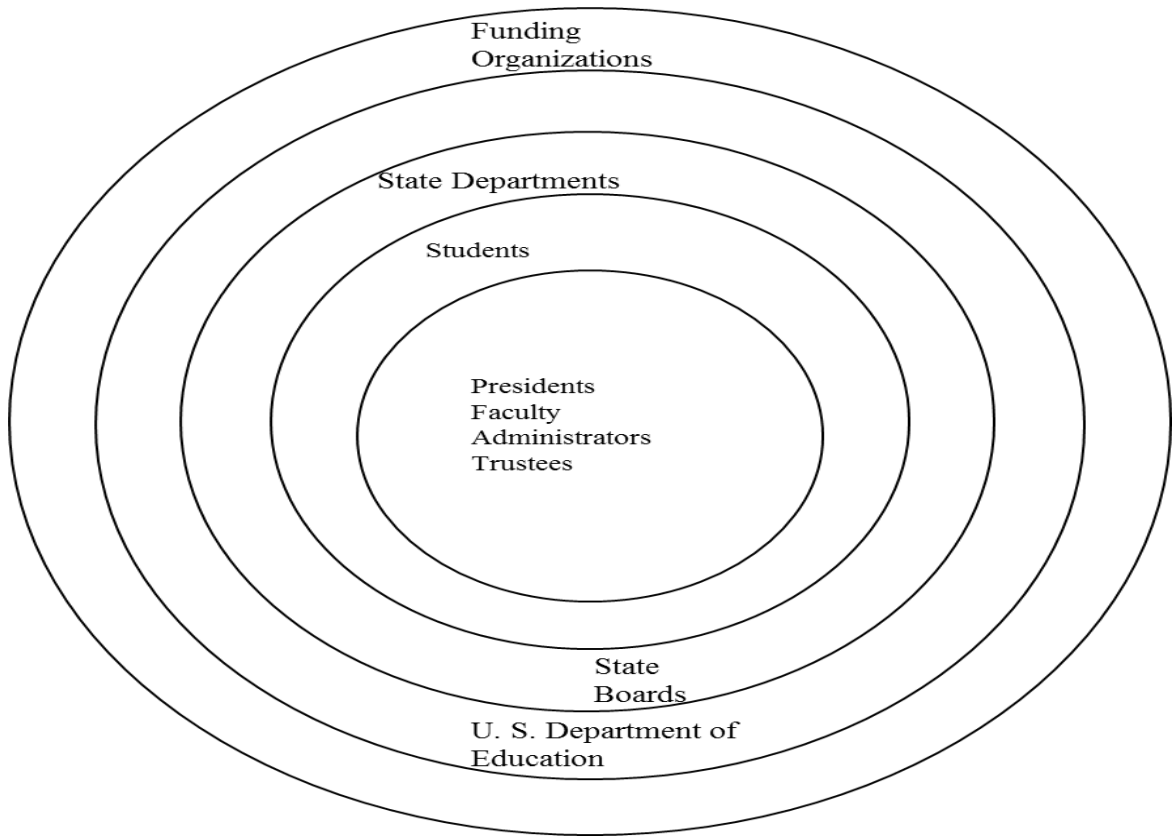


Figure 1. Policy actors within this study. Adapted and modified from *The Law of Higher Education, Student Version* (4th edition) by W. A. Kaplin & B. A. Lee. San Francisco, CA: Jossey-Bass.

In addition to the offices within the DOE, there are nine program areas including but not limited to: (a) Office of Innovation and Improvement, (b) Office of Postsecondary Education, (c) Office of Special Education and Rehabilitation Services, and (d) Office of Federal Student Aid (U.S. Department of Education, 2015g). The DOE also houses educational boards, commissions, and councils which address educational initiatives. The DOE is located in Washington, D.C. and employs a staff of approximately 3,100 employees. In addition to the headquarters in Washington, D.C., the DOE maintains 10 regional office spaces throughout the United States and employs approximately 1,100 additional individuals (U.S. Department of Education, 2015h).

State

In all fifty states, colleges and universities are represented by a broad spectrum of institution type. In any given state, there might be public or private institution, community college, religiously affiliated school, women's college, or historically black college or university. Each college and university has a different funding structure, whether it be private or public. Typically, a college is funded by tuition and/or funding from the state if it is public in nature (Dar & Lee, 2014). Higher education funding has dramatically shifted from the percentage of money the state will provide an institution to more of the burden being placed on the student and/or parents to provide funding (Dar & Lee, 2014). The Title IX mandates on colleges and universities are not being imposed by the state. Neither are the financial burdens being imposed from the state from not cooperating with the mandates (U.S. Department of Education, 2015d).

Local

Increasingly, the federal government has taken on a role which is regulatory in nature in regard to policies which affect colleges and universities (Lake, 2013). On a local level, there are times where higher education institutions may determine it is appropriate to comply with federal regulations and policies regardless of the implications it might have on the college or university (Kaplin & Lee, 2007). Conversely, the federal government has the ability to place constraints and mandates on a higher education institution which makes it incapable of not complying with said regulations. One example of the “power” the federal government has over colleges and universities is the ability to maintain their federal funding. To ensure colleges and universities are complying with federal mandates, policies and procedures must be created locally at each institution which match those given by the federal government.

At some level, every college and university has a layer of ultimate governing authority. For the majority of institutions, this governing authority resides within a board of governors or board of trustees (Gayle, Tewarie, & White, 2003). Boards such as these are commissioned by the state, and membership is typically elected or appointed. The goals of such boards range anywhere from hiring presidents to reviewing budgets to general and nonintrusive oversight of policies and procedures (Gayle, Tewarie, & White, 2003). While the oversight is not intrusive, these boards have the ability to approve such policies and procedures which will be enacted upon by the institution.

When policies are not being placed upon the institution from the federal government, policies and procedures are created, at a basic level, by the faculty, staff, and students of said institution. Changes or creation of policies will be voted on by the

faculty in their faculty senate and by the staff in their staff senate. Similarly, students will vote in their student government associations. All of these bodies are governmental and legislative in nature. Once all three bodies vote on said policies there is movement to an administrative council comprised of executive administrators who, in turn, report to a board of governors or trustees (Gayle, Tewarie, & White, 2003).

Organizational Analysis

The relationship of the U.S. Department of Education and institutions of higher education are separate yet connected. Both operate independent of each other; however, there are times when one organization may impact the other organization. Regardless, the structure of both organizations are similar. For the purpose of this section, the researcher will construct an analysis of the U.S. Department of Education, and colleges and universities. Mintzberg (1979/2005) offered a structural model which can be utilized to analyze the basic parts of an organization. There are five parts which Mintzberg (1979/2005) identified that include: (a) the strategic apex, (b) middle line, (c) operating core, (d) technostructure, and (e) support staff (see Figure 2).

At the organization's foundation is the operating core. This element contains the workers who, at the basic level, perform the work that is related to output (Mintzberg, 1979/2005). At the U.S. Department of Education, the employees in each department who answer questions or provide resources to colleges and universities comprise this role. Conversely, at colleges and universities, the staff who are reporting Title IX incidents to the Title IX Coordinator fit this role. Moving through the organization is the middle line.

The middle line workers are concerned with the flow stemming from the workers above them (Mintzberg, 1979/2005). In the college and university setting, the Title IX Coordinator can be seen in this role. The Title IX Coordinator is working on the initiatives and mandates from the U.S. Department of Education and also college and university leadership. Within the U.S. Department of Education, the workers who oversee a given program area fit this role.

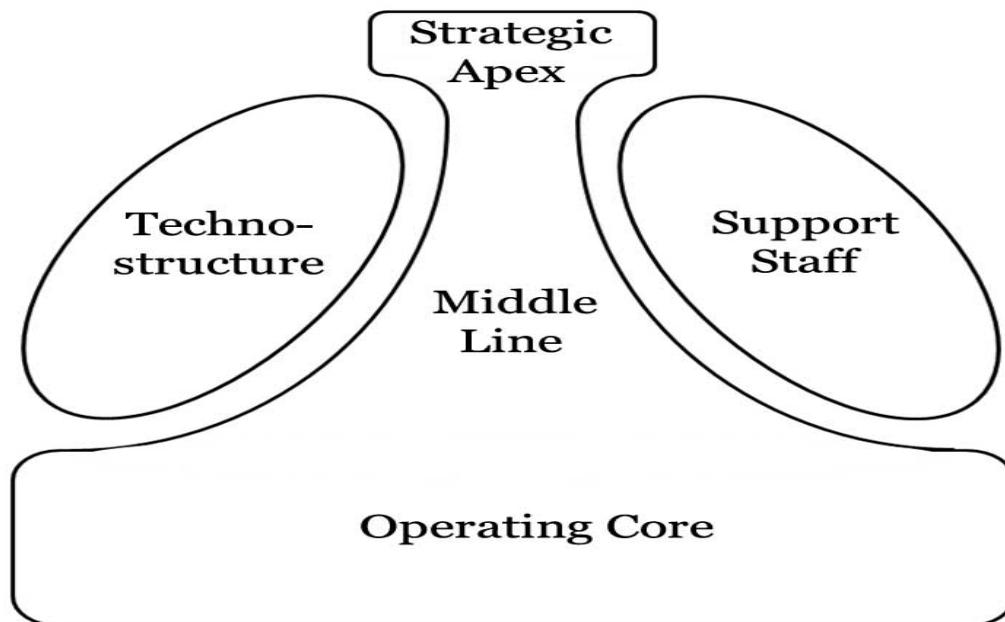


Figure 2. *The five basic part of organizations. Adapted from the “The five basic parts of the organization” by H. Mintzberg (2005) in J. M. Shafritz, J. S. Ott & Y. S. Jang (Eds.), Classics of organizational theory (6th ed., pp. 219-230). Boston, MA: Wadsworth*

At the top of the model is the strategic apex. The strategic apex is the leaders of the organization who are in charge (Mintzberg, 1979/2005). At the U.S. Department of Education, the Secretary of Education is the individual who oversees this organization. University presidents, administrative councils, and governing boards reflect this element

in the college and university setting. On either side of the model are the technostructure and the support staff. These individuals serve and support the workers within the model by carrying out the day-to-day tasks which are associated with the work that needs to get done (Mintzberg 1979/2005).

The organization's composition is important to understand as well as the structural tensions of said organization. Bolman and Deal (2008) offered two structural tensions: vertical coordination and lateral coordination. Vertical coordination is a top down approach where high level workers direct lower level workers on the job necessities. This approach has elements of authority, rules, and control. The U. S. Department of Education can be viewed to have vertical coordination on colleges and universities across the nation. The U.S. Department of Education has mandated certain constraints under Title IX for every college and university by enacting rules, policies, and procedures under Title IX. Specifically, each college and university will have a Title IX Coordinator.

Conversely, colleges and universities reside within lateral coordination, which is less formal and is comprised more of meetings, task forces, and coordinating roles (Bolman & Deal, 2008). Colleges and universities have the ability to share governance when policies and procedures are developed in a cooperating manner. Given the Title IX mandates from the U.S. Department of Education, colleges and universities fit in vertical coordination. Colleges and universities do not have the ability to move outside of the mandates from the U.S. Department of Education without incurring fines and punishments which have yet to be established. Pfeffer and Salancik (1978/2005) posited "The external basis for judging organizational effectiveness makes the concept of

environment important.” (p. 526). There is an external pressure which both the U.S. Department of Education and institutions of higher education are currently facing which would explain the reasons why policies, rules, and mandates are becoming top down in the area of Title IX. The landscape of education has shifted to a consumer model and a customer service model.

A common thread among all of these organizations is the power which each organization holds. Each organization has the ability and power to create policies, procedures, and constraints on other parties. Power can be seen in varying elements throughout an organization. At each level, there is a degree of authority the organization has over the other and a degree of authority each has in respect to decision making. Furthermore, there is a degree of authority each has within their own organization over their constituents. All three organizations have the ability and authority to create policies and procedures which can be placed on their subordinates (Bolman & Deal, 2008). Whether or not they do so, and how they do so, may vary as well.

Individuals with authority power have the ability to make decisions which are required specifically on their subordinates (Bolman & Deal, 2008). Additional measures of authority include the ability to monitor progress and provide feedback on how the progress is being made. The U.S. Department of Education is an example of an entity with authority. It seeks to monitor whether or not an institution has a Title IX Coordinator and will provide punishments by way of monetary fines if progress is not being made (U.S. Department of Education, 2015b). All three of the organizations have positional power and also have coercive power (Bolman & Deal, 2008). From the standpoint of review from the U.S. Department of Education, the positional power it has

over the other organizations in the area of Title IX compliance is enormous. Not only does the U.S. Department of Education have a title which exerts authority but it also has legitimacy. The U.S. Department of Education is a body which has been authorized by the federal government. In regard to coercive power, the U.S. Department of Education has the ability to punish and constrain colleges and universities across the nation if they do not comply with the Title IX mandates (Bolman & Deal, 2008).

Leadership Analysis

Within each organization, there are leaders who have varying leadership styles. Regardless of how one leads or how one wants to lead, there are times where leaders have constraints placed on them. The following section offers an analysis on leadership theories which are present for both the U.S. Department of Education and colleges and universities with respect to Title IX implementation.

In 2011, when the U.S. Department of Education authored and distributed the Dear Colleague Letter (U.S. Department of Education, 2015b), it was a call to colleges and universities that they needed to do more to prevent sexual assaults from occurring on campuses and to ensure the educational experience of students was not altered if they did occur. The U.S. Department of Education saw colleges and universities as lax in their approach to sexual assault prevention and education (U.S. Department of Education, 2015a). The Dear Colleague Letter (U.S. Department of Education, 2015b) took a top down leadership approach from the U.S. Department of Education to colleges and universities. Equally important, the approach was one that would follow with fines, parameters, and constraints placed on colleges and universities by the U.S. Department of Education.

Northouse (2013) described a leadership style entitled Path-Goal Theory. The concept behind the Path-Goal Theory is that as leaders seek to understand what motivates its subordinates. Furthermore, leaders seek to understand what will help subordinates achieve their goals. The U.S. Department of Education has utilized fines and penalties to ensure colleges and universities hire a Title IX Coordinator. This form of motivation may not be the best leadership trait but it is the motivation that means a lot to colleges and universities. Imposing fines and penalties on colleges and universities may impede their livelihood or even existence.

One of the major components of Path-Goal Theory is the behavior which leaders may demonstrate to help subordinates achieve their goals. Northouse (2013) described one behavior as, “A directive leader sets clear standards of performance and makes the rules and regulations clear to subordinates” (p. 139). Leaders are directive over their subordinates. The U.S. Department of Education has been very clear with colleges and universities in regard to their expectations. Colleges and universities must have a Title IX Coordinator, and if there is none, fines and penalties will ensue. Furthermore, the theory contends that once the subordinates have trust in their abilities, the need for directive leadership should diminish. Another behavior of leaders who exhibit this theory is achievement-orientated. Northouse (2013) described this style as “Achievement-orientated leadership is characterized by a leader who challenges subordinates to perform work at the highest level possible” (p. 140). The importance the U.S. Department of Education has placed on Title IX currently is significant, and it can be theorized that the U.S. Department of Education is challenging colleges and universities to perform at a maximum level.

Another leadership style which can describe the U.S. Department of Education and colleges and universities in regard to Title IX implementation is the situational approach (Northouse, 2013). The situational approach is, in essence, the way leaders respond to subordinates based upon the situation. Once again, there are different approaches to how leaders respond. For instance, one approach is directive. Directive behaviors aid subordinates in “accomplishing goals by giving directions, establishing goals and methods of evaluation, setting time lines, defining roles, and showing how the goals are to be achieved” (Northouse, 2013, p. 101). The U.S. Department of Education has outlined their goals by disseminating the Dear Colleague Letter (U.S. Department of Education, 2015b) and subsequent ones which have followed. While the U.S. Department of Education has been deficient in offering clear guidelines on how to achieve the mandates, it has been very clear on which mandates it wants colleges and universities to achieve.

On the other hand, the situational approach is contingent on the developmental level of the subordinate (Northouse, 2013). The subordinate in this case would be colleges and universities. The leader adapts his/her leadership style dependent on the developmental level of the subordinate. In the case of colleges and universities, the U.S. Department of Education needs to take a more directive approach given this situation. The U.S. Department of Education has mandated certain regulations and guidelines within Title IX that colleges and universities are not capable of handling at this time. Once colleges and universities are more comfortable with the directives from the U.S. Department of Education or the U. S. Department of Education offers more guidance, the current directive leadership style can alter the other stages of situational leadership.

Implications for Research in the Practitioner Setting

Title IX has been in existence since the law passed in 1972 (Block, 2012). While Title IX was initially a law which sought to equal the playing field in education, the law expanded to equality in athletics for women due to limited guidance from the federal government (Block, 2012; Hoffman, 2011). In 2011, the U.S. Department of Education (2015b) sent colleges and universities a Dear Colleague Letter which changed the landscape of higher education when they interpreted Title IX to encompass sexual assault, sexual harassment, and sexual misconduct. The U.S. Department of Education has placed mandates on colleges and universities but once again have offered little to no guidance on how to achieve those mandates (Block, 2012; Hoffman, 2011; U.S. Department of Education, 2015b).

Given the current interpretation of Title IX and the impact that interpretation has had on the government, the number of mandates most likely will continue to increase. With that increase, practitioners in the field should continue to research ways in which colleges and universities can make strides to meet the U.S. Department of Education mandates. Congruent with Path-Goal Theory practitioners who can be seen as subordinates, will strive for direction and clarity in tasks (Northouse, 2013). Practitioners need to focus on how the mandates fit their institution and how they can comply with the hollow mandates. Furthermore, Path-Goal Theory posits the concept that as subordinates become more competent in their role and leadership style, the need for directive leadership will lessen (Northouse, 2013). If practitioners continue to research and publish the research on complying with mandates, the competence level will rise, and the directive leadership of the U.S. Department of Education should lessen.

Along with the need to research guidance on the mandates, additional research needs to be done in the area of consequences for colleges and universities which do not fulfill the mandates. Currently, there are numerous bills and laws being brought before the government on how to penalize institutions who do not comply with the U.S. Department of Education's mandates (U.S. Department of Education, 2015i). Colleges and universities maybe at a loss for expectations regarding penalties. Currently, the U.S. Department of Education holds great power over colleges and universities as the penalties are real in nature. As of July 2015, 124 colleges across the nation were being investigated by the Office of Civil Rights for some sort of Title IX violation (Kingkade, 2015). The Office of Civil Rights has voiced their concern for the amount of staff they have versus the number of investigations they are currently conducting. If continued research is shepherded in this direction, the potential for fewer violations might occur.

Summary

The Office of Civil Rights, a direct artery of the U.S. Department of Education directly oversees the administration and enforcement of Title IX. While the Office of Civil Rights oversees Title IX, it has directed every college and university to hire a Title IX Coordinator who will serve as a resource and clearinghouse for Title IX complaints (U.S. Department of Education, 2015b). The structure and leadership of both the U.S. Department of Education, and colleges and universities provides insight into the inner workings of both organizations. Finally, while the research being conducted in this study on experiences of Title IX Coordinators is worthwhile and noteworthy, the research on the experiences of Title IX Coordinators needs to continue. The amount of research and scholarly research, at best, in this area is bleak.

CHAPTER THREE
SCHOLARLY REVIEW FOR THE STUDY

Susie went to a party one night with her good friend Tom. Susie and Tom had known each other since their freshman year and were now entering their junior year. They had always been friends but nothing more. At the party Susie and Tom both drank a lot. After the party, Tom walked Susie back to her residence hall room. Susie asked Tom to come in and started kissing Tom. Both Susie and Tom were drunk and engaged in sexual intercourse. The next morning, Tom left and thought nothing of the encounter. Susie began to feel disturbed about the encounter and questioned what took place between her and Tom. During the next week, Susie started to not pay attention in class and began to withdraw from her friends. Susie began to have a difficult time turning in her homework and did not return any calls from Tom. Susie went to see a counselor so she could speak with someone about what she was feeling.

The vignette above describes the type of information that is being reported to Title IX Coordinators from college aged students across the United States. As a result of the Dear Colleague Letter, the Office of Civil Rights called for each higher education institution to employ a Title IX Coordinator who would serve as a gatekeeper for sexual harassment, sexual assault, and sexual misconduct (U.S. Department of Education, 2015b). Overall, the Title IX Coordinator would be the clearing house for complaints related to discrimination based on sex when it impacts the educational existence of a student on a college campus. This literature review will examine the extant literature surrounding Title IX and the emergence of the Title IX Coordinator's role on a college campus.

History of College Student Discipline

Evidence of student discipline can be traced back to the establishment of colleges and universities. Student discipline has evolved from presidents of universities handling student misconduct to faculty members to deans to present where there are student conduct administrators. The evolution of student misconduct matters can be seen as a parallel to the varying role of higher education in the lives of students.

In the early years of higher education, wealthy men attended universities where there was an expectation to uphold the highest level of Christian morality (Lancaster & Waryold, 2008). Young men, no older than high school students today, who attended higher education institutions sought an education so they could become future religious and civic leaders while maintaining a high level of character (Dannells, 1997). Different than higher education today, the president and faculty were responsible for the moral shaping of students. The belief at this time was "...educators would mold youth to the love of virtue and good order ..." (Bracewell, 1997, p. 45). College students had rigid schedules and strict codes of conduct where not much would pass by the president and faculty (Dannells, 1997).

A common term among higher education professionals, which stemmed from the early stages of colleges and universities is that of *in loco parentis*. This term can be affectionately characterized as "in place of a parent" (Lancaster & Waryold, 2008, p. 9). Essentially, the president and faculty were serving as caretakers in place of the parents of the students who were attending said college. Common during this time were punishments for student misconduct such as flogging, public reprimands, corporal punishments, fines, and loss of privileges (Dannells, 1997).

The landscape of higher education began to diversify with the emergence of admitting female students, dormitories or residence halls, and a variety of non-academic services such as counseling and career centers, social Greek-lettered organizations, and student organizations. Higher education, at this time, saw more of the German influence than that of the previously regarded Oxford and Cambridge influence (Bracewell, 1997; Dannells, 1997). German universities were growing their curriculum to include more

research. As such, discipline saw change as well. A level of democracy and student rebellion materialized (Dannells, 1979). Faculty were completely responsible for all aspects of student supervision to include room inspections and dormitory rounds. During this time, faculty became frustrated with their strict roles and duties as well as students began to question how faculty were treating them. For faculty, who were more akin to research and publication, these aspects of their jobs were disheartening (Dannells, 1997). As faculty pushed back at their responsibilities to oversee student misconduct, university and college presidents created Dean of Men's and Dean of Women's positions.

With the creation of the Dean of Men's and Dean of Women's positions, there became a divide between the role of academics and personal affairs for students. Faculty were able to teach and the newly-created Dean of Men and Dean of Women were able to oversee the development of students (Bracewell, 1997; Dannells, 1997). Not only were the roles of the Dean of Men and the Dean of Women to discipline students but also to serve as individuals who developed students. This shift to student development can be seen within student discipline as well. The Dean of Men and Dean of Women developed on a persona and philosophy, which espoused self-discipline and individualization. Equally important, the philosophy shifted to a culture of counseling within the discipline process versus the need to punish (Bracewell, 1997; Dannells, 1997).

The appearance of the Dean of Men and Dean of Women positions also opened the door for the role of student affairs professionals. According to the foundational writings of student affairs work, the Student Personnel Point of View of 1937, student affairs professionals were characterized as "...officers [who] were appointed first to relieve administrators and faculties of problems of discipline; but their responsibilities

grew with considerable rapidity to include a large number of other duties...” (American College Personnel Association, 2015, p. 2). The role of the Dean of Men and Dean of Women merged into one position, and student conduct administrators arose out of the creation of student affairs professionals. Student conduct professionals, today, are the administrators in charge of adjudicating student misconduct on a college and university campus.

Student Discipline Procedures

Prior to sexual misconduct or sexual violence allegations being categorized under the guise of Title IX, student conduct administrators were adjudicating such violations within the realm of the university’s or college’s student code of conduct. A university’s or college’s code of conduct is a written document that outlines prescribed behavior that each student is expected to maintain during his/her tenure. In addition to the prescribed behavior, codes of conduct articulate a student’s rights, due process, and hearing proceedings (King, 2012).

The Dear Colleague Letter affirmed the stance of Title IX complaints staying under the umbrella of student disciplinary procedures when stating “...a recipient may use student disciplinary procedures or other separate procedures to resolve such complaints” (U.S. Department of Education, 2015b, p. 8). Moreover, the Dear Colleague Letter specified “If the recipient relies on disciplinary procedures for Title IX compliance, the Title IX coordinator should review the recipient’s disciplinary procedures to ensure that the procedures comply with the prompt and equitable requirements of Title IX” (U.S. Department of Education, 2015b, p. 8).

Student discipline on a university or college campus is not comparable to a legal matter in a court but comparable to a student development process (Dannells, 1997; Lancaster & Waryold, 2008). The student discipline system was established as a way to prevent harm and intervene prior to the student's misconduct becoming a disruption to the educational mission (King, 2012). Nevertheless, if a student commits a violation where legal entities would become involved, the student may face both a legal trial in the court system and disciplinary procedures at the respective college or university. The Dear Colleague Letter affirms this notion by clearly articulating "the school's Title IX investigation is different from any law enforcement investigation, and a law enforcement investigation does not relieve the school of its independent Title IX obligation to investigate the conduct" (U.S. Department of Education, 2015b, p. 4). While the student discipline process is one where student development is encouraged as a part of the process, the Title IX process differs. The Title IX process centers on the premise of stopping the conduct of one student who is creating a hostile educational environment for another student (U.S. Department of Education, 2015b).

Procedures that surround students when they violate their university or college code of conduct vary depending on the type of institution, size, mission, and history. Furthermore, the locus of university or college control whether or not the institution is public or private is a factor as well. The Dear Colleague Letter declared certain procedures within the context of a Title IX complaint that the Office of Civil Rights deemed practice, regardless of the type of institution that is handling said complaint (U.S. Department of Education, 2015b). Once again, the stance derived from the Dear Colleague Letter was clear that student discipline procedures may be used to adjudicate

Title IX complaints as long as the process “meet[s] the Title IX requirement of affording a complainant a prompt and equitable resolution” (U.S. Department of Education, 2015b, p.8).

There are four stipulations, according to the Dear Colleague Letter, which must be included within a Title IX complaint for there to be a prompt and equitable resolution to a student grievance. Prior to the release of the Dear Colleague Letter, the aforementioned stipulations were not a part of the student discipline procedures when handling complaints of sexual violence. The stipulations include: (a) notice of grievance procedures, (b) adequate, reliable, and impartial investigations of complaints, (c) designated and reasonably prompt time frames, and (d) notice of outcome (U. S. Department of Education, 2015b, pp. 9-13). The fourth stipulation, notice of outcome, maintains that each party in the complaint (complainant and respondent) will receive notification of the outcome and any appeal rights.

Sexual Assault

Given the close proximity of men and women who interact in multiple social settings on a college campus where access to drugs and alcohol is frequent, sexual assault on a college campus has been happening at an alarming rate as the 2007 Campus Sexual Assault (CSA) study reported that one in five women and one in 16 men are sexually assaulted on a college campus (Krebs, Lindquist, Warner, Fisher, & Martin, 2009). This statistic, which currently is used by the National Sexual Violence Resource Center, comes from the Research Triangle Institute International team who submitted their report in 2007 to the U.S. Department of Justice after conducting research in the area of sexual assault. The research was three fold as the study sought not only to examine the

prevalence of sexual assault on campus but also to educate and provide information on sexual assault and safety (Krebs, Lindquist, Warner, Fisher, & Martin, 2007).

The research related to college and university success and retention point to the importance of the first few weeks in a student's life as being important to his/her success at an institution (Levitz & Noel, 1989). On a college or university campus, men and women will come into contact with each other. College students have frequent access to social outlets which allow them to interact with a number of different people in addition to more contact to alcohol and drugs than a person would have anywhere else (Sinozich & Langton, 2014). In addition to college students having access to elements (i.e. alcohol and drugs) which they would not normally have the ability to obtain, college students are living on their own versus living with their parents; furthermore, there is more avenues for students to have a single bedroom. With that being said, the number of individuals who are sexually assaulted by a person they have a relationship with is more so at a college or university. Acquaintance rape or sexual assault takes place not necessarily when two people are on a date but when two people are in the same place and know each other (Sampson, 2003). In a 2014 survey of college-aged females, the researcher reported "More than 3 in 4 student victims of rape and sexual assault knew the offender" (Sinozich & Langton, 2014, p. 7).

One of the cornerstone stipulations of the Dear Colleague Letter was the right of the victim to an adequate, reliable, and impartial investigations of complaints (U.S. Department of Education, 2015b). A frightening number of sexual assault victims do not report a violation of sexual assault to law enforcement and/or college and university officials. In 2000 the National College Women Sexual Victimization (NCVS) study

reported “In about two-thirds of the rape incidents, however, the victim did tell another person about the incidents” (Fischer, Cullen, & Turner, 2000, p. 23). The other person is a friend or confidant and typically not a college or university official.

While there are several reasons for the Office of Civil Rights to mandate this stipulation, one of the more prevalent reasons is due to the 2002 and 2005 follow-up research by Karjane, Fischer, and Cullen (2002/ 2005) about campus sexual assault. Karjane, Fisher, and Cullen (2002/ 2005) published two studies for practice reports that highlighted the need on a college and university campus to provide reporting which feels safe to the victim. In the 2005 report, Karjane, Fisher, and Cullen state “less than 5 percent of completed and attempted rapes of college students are brought to the attention of campus authorities and/or law enforcement” (2005, p. 3). This number is low due to multiple barriers such as (a) the college or university’s limiting the victim’s choice to make an informed decision, (b) the victim’s unclear understanding of how the assault was a crime, (c) the victim’s low trust in the university official maintaining a level of confidentiality, (d) the victim’s apprehension in wanting to participate in a public adjudication process, (e) the victim’s belief that he/she will not be able to identify the assault as a crime, and (f) the victim’s belief that the assailant will not be held accountable (Karjane, Fisher, & Cullen, 2002).

1967 Commission on Obscenity and Pornography

In 1967, President Johnson organized a commission which focused on obscenity and pornography. When the full commission report was ready to be published in 1970, President Nixon was in office (Lewis, 2008). The commission was tasked with the following “analyse obscenity law and recommend a useful legal definition for obscenity;

explore the nature and volume of traffic in pornographic materials; study the effect of such materials on the public; and recommend legislation to regulate such volume and traffic” (Lewis, 2008, p. 10). In the end, the report was lengthy at 700 pages, and offered an annotated scholarly and complete review of the above-mentioned tasks. The report also provided guidance in the area of sex education as it laid out a ten-point plan. Furthermore, the report also sternly decriminalized pornography as the commission felt it was risky for the government to take a stand on moral values and behavior of individual people (Lewis, 2008).

The most notable observation of the commission centered upon the idea of sexual assault and pornography. At the time, it was believed that there was a connection between those individuals who sexually assaulted another person and being a pornographic consumer (Lewis, 2008). What the commission stated was the opposite. The commission was able to provide studies which rebutted public opinion. When discussing prevention of sex crimes, the commission went further to state “banning pornography was at least irrelevant, at worst counterproductive” (Lewis, 2008, p. 15). The commission was able to cite research that there was no relationship between the amount of pornography one viewed and sexual assault. The commission began the discussion related to the foundation of sexual assault. Additionally, their report pointed to the influence of home and peer behavior as being essential traits (Lewis, 2008).

Title IX

Title IX originated as a law that derived from the civil rights and feminist movements stemming back as early as the 1950s. In 1954, the Supreme Court handed down its decision regarding *Brown v. Board of Education* which banned racial

segregation in public schools. In 1964, the Civil Rights Act, or Title IV, was passed which barred employment discrimination based on race, color, religion, sex, or national origin (Block, 2012). The passage of the Civil Rights Act of 1964 paved the way for Title IX's introduction. The Civil Rights Act of 1964 enforced non-discrimination within fields of employment and not education (Block, 2012; Women's Educational Equity Act [WEEA] Resource Center, 1997).

The concept of Title IX originated in 1969 when Bernice Sandler was employed at the University of Maryland. Sandler's male colleagues saw her as being too assertive, so she was denied the chance to obtain a position which would eventually lead to awarding her tenure (Ware, 2007). Sandler decided to file a complaint, and subsequently created a relationship with the Chair of the Education committee, Representative Green (Ware, 2007). Through this relationship, Sandler and Green worked to create the language which is now Title IX (Ware, 2007; Winchester, 2012). The initial bill concerning Title IX sought to amend Title VI, Title VII, and the Equal Pay Act (Ware, 2007).

The first versions of Title IX proposed to amend not only the Civil Rights Act to protect employees in educational institutions but also further amend the Civil Rights Act to include sex discrimination. After discussing the proposed amendments in the Senate, supporters felt the amendments would weaken the current Civil Rights Act so they created a stand-alone act called Title IX (Ware, 2007), which is encompassed within the Higher Education Acts of 1972 (Block, 2012; Ware, 2007; Women's Educational Equity Act [WEEA] Resource Center, 1997). In the end, Title IX was identical to that of Title VI except it was limited to education (Ware, 2007).

Title IX's preamble reads: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any educational programs or activity receiving federal financial assistance" (Title IX, 1972). As seen by the preamble, Title IX, as an act, is vague which led President Nixon to give interpretation of the act to the Department of Health, Education, and Welfare (DHEW). The language was broad as the act spanned not only employees but also students from kindergarten to graduate school; essentially, the act protected anyone who was enrolled in an educational setting (Hanson, Guilfooy, & Pillai, 2009). In 1975, after the DHEW was able to solidify the interpretation of this act, President Ford signed the Title IX regulations that would ensure equity (Block, 2012; Ware, 2007; Women's Educational Equity Act [WEEA] Resource Center, 1997). The heart of Title IX was not only to allow for more women to be encouraged to have access to educational benefits at an institution of higher education but also to encourage more females to major in areas such as science, health, or mathematics which were male dominated. While Title IX was to be interpreted as a way to allow equal access at educational institutions for women, it quickly turned into an act based on women and their role in athletics (Ware, 2007; Winchester, 2012). Originally there were no regulations on how to enforce gender equality. In 1979, the Department of Health, Education, and Welfare created a three-pronged test which enabled institutions to show they are in compliance with Title IX (Ware, 2007). The three-pronged test is still in effect today, but manipulations have been made throughout its existence. As Title IX evolved, the definition and interpretation evolved as well. Title IX's practical application could be seen in the day-to-day operations of an educational institution. For instance,

access to courses, equivalent facilities, financial assistance, health services, admissions, and educational programs are all examples of the application of Title IX (Hanson et. al., 2009). As lawmakers and practitioners began to fully examine the scope of Title IX, the interpretation was challenged as well in different ways.

Two court cases were fundamental to lawmakers viewing Title IX in a different context than gender equality in sports. The 1992 case of *Franklin v. Gwinnett County Public Schools* held a school could be liable for the sexual misconduct of an employee if the institution was aware of the misconduct (Block, 2012; Ware, 2007). Equally important was the notion that monetary damages would be an acceptable remedy. In 1999, a school district in Monroe County was sued by a student's mother as she believed her daughter was sexually harassed by another student at school. The courts ruled the sexual harassment was severe enough to cause a disruption in the educational experience of this student based on sex discrimination (Chaves, 2000; *Davis v. Monroe County Board of Education, 1999*). The court was able to address the question of whether or not an institution could be held liable for their students given the school knew nothing about the harassment. These cases were crucial to the development of mandatory reporting by school officials. *Davis v. Monroe County Board of Education* (1999) was a pivotal case as it opened the doors for a different interpretation of Title IX (Chaves, 2000; *Davis v. Monroe County Board of Education, 1999*).

Violence Against Women Act (VAWA)

Since the 1960s, enrollment at a college institution was significantly higher for females compared to males; this era also saw the passing of the Equal Pay Act (Hanson et. al., 2009). Noteworthy to the 1970s was the landmark case of *Roe v. Wade 1997*

which stated women had the right to have ownership of their bodies. The 1980s saw the emergence of an awareness regarding sexual misconduct crimes against women, especially on college campuses. The 1980s also saw an emergence of women's empowerment in society (Hanson et al., 2009).

At the time, Title IX was not in the forefront of this movement; however, conversations about sexual misconduct were starting to move toward that viewpoint (Sloan & Fischer, 2011). In the 1980s, two studies were completed that illuminated the heightened awareness of sexual misconduct eventually shed light on the problem for government officials. Both the *Ms. Campus Project on Sexual Assault* and *The Project on the Status and Education of Women* produced concrete data regarding the problem of sexual misconduct issues related to women. Equally important, both studies shone a spotlight on the problems at college campuses across the nation (Hanson et al., 2009; Sloan & Fischer, 2011). One influential lawmaker who took notice was Senator Joseph Biden who would become a leading voice in the Violence Against Women (VAWA) Act (Sloan & Fischer, 2011).

In 1990, Senator Joe Biden introduced legislation that provided support, resources, and funding for violent crimes against women. Biden and his staff conducted a three-year study into violence against women. The proposed legislation was the Violence Against Women Act, and it was incorporated into the Violent Crime Control and Law Enforcement Act of 1994 which was signed by President Clinton (Office of Violence Against Women, 2015a). The Violence Against Women Act (1994) unites victims of sexual crimes and the law with an emphasis on protection of the victims. Equally important, it was a measure of offender accountability. Not only did VAWA

hold offenders accountable, but it also provided financial support which was critical with this type of legislation (Schmidt, 2015). VAWA created the following but not limited to: (a) a rape shield law where a victim's past sexual history cannot be used against him/her, (b) a structure where victims do not have to encounter the cost of services or protection orders, and (c) training for law personnel (Office of Violence Against Women, 2015b).

VAWA was reauthorized in 2000 by President Clinton to include the addition of dating violence and expansion of stalking laws. The reauthorization was significant as well because it allowed law enforcement personnel to obtain arrest grants to cover costs (Office of Violence Against Women, 2015b). VAWA's reauthorization of 2000 went further to offer transitional housing for victims and rewrote numerous federal laws, such as the ability for victims to insist on HIV testing of offenders (Laney, 2011). Finally, in 2005, VAWA was reauthorized once again, and this time included additional resources on violence toward Indian (tribe) women and youth victims (Office of Violence Against Women, 2015). Significantly, this reauthorization also called for collaboration between law enforcement, campus conduct staff, and public and private service providers (Laney, 2011; Whitehouse, 2014). This collaboration would pave the road for the Department of Education's rationale when mandating a Title IX Coordinator at every educational institution. In 2013, President Obama reauthorized VAWA yet again which introduced the Campus SAVE Act and updated the VAWA requirements that changed the landscape of mandatory crime reporting, specifically the Clery Act (Clery Center, 2015a).

Clery Act (Student Right-to-Know and Campus Security Act)

Similar to crime happening in a city, crime happens on a college campus as well. Dating back to the establishment of colleges and universities, campus crime was not

being reported to the general public. Colleges and universities were under the guise that they were handling crime themselves, and there was not a need to report. As more college students and their parents began to question and apply pressure about which crimes were happening on a college campus, it became apparent to administrators that a report needed to be published regarding crime (Griffaton, 1993). The mounting pressure was applied when a student who attended Lehigh University in Bethlehem, PA, was raped and murdered in her room by a community member who walked into the student's room (Sloan III & Fischer, 2011). The parents of this student, Connie and Howard Clery, felt their daughter would have made different choices related to her safety if she knew the current state of crime on Lehigh's campus (Clery Center, 2015b; Sloan & Fischer, 2011).

Originally named the Student Right-to-Know and Campus Security Act of 1990, this law mandated colleges and universities to annually publish their crime statistics to the public (Sloan & Fischer, 2011). The annual mandated crime report is a means to openly share information so that potential and current students, as well as the community, will have a clear picture (Janosik & Gehring, 2003; Sloan & Fischer, 2011). Equally important is how the act mandates colleges and universities to issue timely warnings to students to ensure they can change their behavior when a crime is imminent. The act also required that students be made aware of educational programs and resources offered by their institution related to crime prevention and sexual assault (Gregory & Janosik, 2003). The act was reauthorized in 1998, and renamed to the Clery Act to acknowledge the legacy of Jeanne Clery, the student from Lehigh University and her parents who petitioned for this legislation (Janosik & Gehring, 2003).

Limited information is known regarding the effectiveness of the Clery Act and whether or not safety on a college campus has decreased due to the mandatory reporting (Janosik & Plummer, 2005; Sloan & Fischer, 2011). The reported statistics have been vital to educating policy and lawmakers as they continue to see the importance in reducing the amount of sexual crimes toward women (Janosik & Plummer, 2005). The Clery Act was important to lawmakers as they utilized this report to evaluate the current backdrop of sexual misconduct crimes against women.

Dear Colleague Letter 2011

The Office of Civil Rights (OCR) is the federal entity which upholds and enforces anti-discrimination, including Title IX (Carroll et al., 2013; U.S. Department of Education, 2015d). The Office of Civil Rights (U.S. Department of Education, 2015d) is clear that the mission “is to ensure equal access to education and to promote educational excellence throughout the nation through vigorous enforcement of civil rights” (para. 1). A 2002 Campus Sexual Assault Survey research report was submitted to the U.S. Department of Justice that documented the prevalence of sexual assault on college campuses and the disturbing amount of collegiate women who were victims of sexual assault (Karjane, Fisher, & Cullen, 2002). OCR found this report to be significant in its findings specifically in the areas of sexual assault victims not reporting an assault to the institution and the widespread nature of this crime on college campuses. OCR felt the nature of this crime was diminishing the educational capacity of college students when they had been sexually assaulted (Karjane et al., 2002). OCR also felt sexual violence inhibits a student’s ability to maintain a quality educational experience due to the trauma

of the crime (Block, 2011; Carroll et al., 2013; Karjane et al., 2002; U.S. Department of Education, 2015a).

As a result of the 2002 Campus Sexual Assault Survey, there was a lack of structure and differing policies among colleges and universities that was apparent to OCR. What was also apparent to OCR was the variance in how each college or university adjudicated sexual misconduct violations as well as the varying degrees of consequences for the perpetrator (Block, 2011; Carroll et al., 2013; Karjane et al., 2002; U.S. Department of Education, 2015d). In 2011, OCR released a Dear Colleague Letter which addressed the inconsistencies at each institution and called for a model which they developed as a sound practice in handling sexual misconduct violations on campuses nationwide (U.S. Department of Education, 2015b). Specifically, this call to action by OCR centered upon the institution's responsibilities to govern Title IX and its protection of the student experience in an educational setting. Among the numerous mandates the Dear Colleague Letter (U.S. Department of Education, 2015b) dictated was the determination that every higher education institution must designate a Title IX Coordinator who would serve as an institutional expert in the field of gender discrimination and would lead the institution's efforts in prevention (Block, 2011; Carroll et al., 2013; Koss et al., 2014).

Sexual Assault Reporting on a College Campus

Prior to the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), guidelines for reporting sexual assault or sexual violence was nonexistent. Higher education institutions chose the reporting method and protocol by their own volition. According to a report sponsored by the Association of American Universities (AAU) on

sexual assault and sexual misconduct, reporting on a college campus was the lowest in regards to sexual touching (Cantor et al., 2015). Participants shared their discontent with reporting processes as to why a report was not made; “the dominant reason was it was not considered serious enough” (Cantor et al., 2015, p. xxi). While this report was administered in the spring semester of 2015, after the 2011 Dear Colleague Letter was released, the results showed there was a need for increased reporting.

The U.S. Department of Education’s position on sexual violence taking place at an educational institution is the responsibility of the institution (U.S. Department of Education, 2015b). With that being said, prior to both the 2011 and 2015 Dear Colleague Letters, there was variance in guidelines specific to sexual violence reporting within higher education institutions (U.S. Department of Education, 2015b; U. S. Department of Education, 2016b). Essentially, the U.S. Department of Education noted how inconsistent or nonexistent sexual assault reporting was on college and university campuses. Inside the 2011 Dear Colleague Letter, the Assistant Secretary of the U.S. Department of Education declared three procedural requirements to sexual assault and/or sexual violence. Two of the three requirements pertained to sexual assault and/or sexual violence reporting on a college campus (U.S. Department of Education, 2015b). First, colleges and universities need to publish a notice of nondiscrimination. The notice of nondiscrimination needs to be specific and not general as to not mislead students. Given this type of discrimination is within the guise of Title IX, this declaration states colleges and universities must publish contact information for the Title IX Coordinator and Office of Civil Rights (U.S. Department of Education, 2015b). The published information needs to also be widely advertised among students, faculty, and staff.

Second, colleges and universities need to “adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee sex discrimination complaints” (U.S. Department of Education, 2015b, p. 6). Grievance policies need not be different than current student conduct processes; however, the policies need to be prompt and equitable. In addition, the grievance process should be written in a language that caters to students’ ability to understand and comprehend the process while also be distributed widely on campus (U.S. Department of Education, 2015b).

Consistent with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), the White House published a 2014 report called “*Not Alone*” (White House Task Force to Protect Students from Sexual Assault, 2014). The report reinforced the message sent from the U.S. Department of Education in 2011 by outlining how colleges and universities should be responding to sexual assaults on campus. Students should have the ability to speak with someone confidentially until they are ready to report to university officials who are considered mandatory reporters. Medical professionals, licensed counselors, clergy, and victim advocates are individuals who maintain confidentiality (White House Task Force to Protect Students from Sexual Assault, 2014). Schools need to create a comprehensive sexual misconduct policy and offer trauma informed training for university officials. Finally, colleges and universities need to offer disciplinary systems that are survivor focused and less victim blamed (White House Task Force to Protect Students from Sexual Assault, 2014, p. 3).

Title IX Coordinators

In 1972 when Title IX was passed, the law was written in a vague manner to the point where the President of the United States was unclear on the definition of said law. President Nixon, at the time, decided to move the interpretation of Title IX into the Department of Health, Education, and Welfare (DHEW); (Hanson, Guilfooy, & Pillai, 2009). Title IX hastily became a law centered upon female gender equality within athletics (Ware, 2007; Winchester, 2012). As Title IX became the face of gender equality in athletics, policy makers, K-12 school districts, and higher education institutions began to see how Title IX would change their policies, procedures, and practices. Therefore, policy makers, K-12 school districts, and higher education institutions created the role of a Title IX Coordinator to diminish the legal ramifications they were facing from the introduction of Title IX (Taylor, 2005).

Prior to the Dear Colleague Letter (U.S. Department of Education, 2015b), Title IX “require[d] that at least one employee be designated to coordinate compliance efforts” (Waterson, 1987, p. 4). Furthermore, Title IX Coordinators were employed to “eliminate broader sex bias and stereotyping which have harmful effects on students, employees, and the educational process itself” (Waterson, 1987, p. 4). This definition of the role of a Title IX Coordinator as stated in a manual for New York state schools is broad yet, at the same time, the coordinator’s work primarily centered upon discrimination in athletics. Title IX Coordinators’ work should encompass assurance that there is no discrimination when it comes to all facets of K-12 education or higher education. For instance, Title IX encompasses facilities, course access, student health services, financial aid, student

activities, and housing; to which a Title IX Coordinator would oversee a complaint process if a violation occurs (Baulch, 2004).

In 1975 lawmakers established Title IX regulations which mandated the first existence of a designated responsible employee who will “...coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions...” (U.S. Department of Education, 2016a, sec. 106.8). While the 1975 regulations mandated a designated responsible employee in K-12 school districts and higher education institutions, both entities continued to struggle with creating a Title IX Coordinator position. The struggle to hire, train, and retain a Title IX Coordinator stemmed from a lack of knowledge on the part of K-12 and higher education, regardless of the amount of communication that came from the Office of Civil Rights (Baulch, 2004; Franke, 1997).

The Dear Colleague Letter of 2011 (U.S. Department of Education, 2015b) produced by the Office of Civil Rights not only reinterpreted Title IX in terms of sexual violence but also reinterpreted the role of a Title IX Coordinator. Once again, the Office of Civil Rights mandated a designated responsible employee be established to “...coordinate its efforts to comply with and carry out its responsibilities under Title IX...” (U.S. Department of Education, 2015b, p. 6). This time the communication was loud and clear from the Office of Civil Rights, and higher education institutions took notice. According to the Chronicle of Higher Education, “On a growing number of campuses, what used to be a part-time job or an add-on for a faculty member or staff member is now full time” (June, 2014, para. 3). Institutions of higher education were

rushing to create Title IX Coordinators positions at colleges and universities. The Office of Civil Rights released a 2015 Dear Colleague Letter which reiterated the Assistant Secretary's expectation that colleges and universities designate a Title IX Coordinators whose sole responsibilities lie with compliance of Title IX regulations due to the federal funding an institution was receiving (U.S. Department of Education, 2016b, p. 2).

Summary

Title IX was a law passed in 1972 that was framed within the civil rights and feminist movements. While the law was first a means to protect individuals from being denied educational benefits, it quickly changed its focus to gender equality within athletics (Block, 2012; Hoffman, 2011). With the introduction of the Violence Against Women Act (VAWA) in 1990 and the Clery Act in 1998, lawmakers began to take notice of the sexual violence which was taking place on college campuses (Clery Center, 2015a; Sloan & Fischer, 2011). The Dear Colleague Letter changed the scope and focus of Title IX by defining how sexual assault, sexual misconduct, and sexual harassment fit within the scope of this law (U.S. Department of Education, 2015b).

CHAPTER FOUR
CONTRIBUTION TO PRACTICE

To be Submitted to: University President, University General Counsel, and
University Title IX Coordinator

Role Definition, Organizational Positioning, and Job Qualifications of Title IX Coordinators

Executive Summary

When Title IX was passed in 1972, the main focus was on sexual discrimination in educational programs. In 2011, the law shifted dramatically to addressing sexual harassment, sexual misconduct, and sexual assault, specifically discrimination based on sex and educational activities. The Office of Civil Rights (OCR), with the deliverance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015), made it clear that all forms of sexual violence constituted a violation because college students have the right to be safe from sexual discrimination in an educational setting or within educational activities. One imperative mandate was for each higher education institution to have one Title IX Coordinator who would devote his or her time to Title IX complaints and investigations. Until recently mandated, there have been no Title IX Coordinators whose sole responsibilities are to regulate or oversee sexual misconduct laws.

Research Questions

- How is the Title IX Coordinator position defined at various institutions? (Role Definition)
- Given its government mandates, how does the Title IX Coordinator position fit into the existing structure of a college or university? (Organizational Positioning)
- What are the qualifications of a Title IX Coordinator (i.e., education, experience, etc.)? (Job Qualifications)

Design of Study

- Twelve Title IX Coordinators (four Deputy Title IX Coordinators) were interviewed for this research study. The Title IX Coordinators may not have sole job responsibilities in the Title IX area or may have been the Deputy Title IX Coordinator who works with the Title IX Coordinator. Two of the 12 Title IX Coordinators were observed.
- The researcher obtained artifacts from the interviewed Title IX Coordinators which are pertinent to the job outcome. Artifacts include, but are not limited to (a) copies of daily calendars and logs, (b) incident reports, (c) investigative reports, and (d) organizational charts. The researcher collected and analyzed job descriptions and organizational charts.

Role Definition

- Title IX Coordinators not only value the 2011 Dear Colleague Letter as a hallmark document for their position but also reference it when making decisions, creating policies, and upholding the values of their job (U.S. Department of Education, 2015)
- Title IX Coordinators should demonstrate proficiency in the 2011 Dear Colleague Letter (U.S. Department of Education, 2015)
- Title IX Coordinators want to cooperate and build relationships with the Office of Civil Rights
- Title IX Coordinators should be an advocate for their home institution

Organizational Positioning

- Title IX Coordinators are supervised by the highest leader at the institution – the president - and want to be supervised by this individual
- Title IX Coordinators should be comfortable with limited office and organizational structure

Job Qualifications

- Title IX Coordinators do need a degree higher than the undergraduate degree. A master's degree is required for this work
- Title IX Coordinators who do not hold the juris doctorate degree were successful in this position
- Title IX Coordinators should possess the ability to critically solve problems in a variety of situations
- Title IX Coordinators need the ability to treat each party involved in a Title IX investigation fairly and impartially until the investigation findings are complete
- Title IX Coordinators' gender is irrelevant to the job.

Recommendations

Office of Civil Rights

- The Office of Civil Rights would better serve its population if there were continued guidance documents with more robust information, specific to the Title IX Coordinator position
- The Office of Civil Rights can offer additional support and guidance by providing concrete expectations versus guidance

- The Office of Civil Rights can provide guidance and support by adding to their online resource website
- The Office of Civil Rights should include information specific to the type of degree, skills, and qualifications related to a successful Title IX Coordinator
- The Office of Civil Rights should provide some training if they have expectations on what a Title IX Coordinator should be doing.

Universities/Colleges

- There should be one centralized Title IX Coordinator at each individual college or university
- The Title IX Coordinator position should continue to be supervised by the highest ranking college or university official, which typically is the president

Complete Report

For a complete copy of this report, please contact Andrea Weber at andreaweber@missouristate.edu. This report is a result of a dissertation written by Andrea Weber. The following individuals served on the dissertation committee: Dr. James Sottile, Dr. Cynthia MacGregor, Dr. Denise Baumann, and Dr. Robert Hornberger.

Selected Reference

U.S. Department of Education. (2015). Dear colleague letter. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.html>

Role Definition, Organizational Positioning, and Job Qualifications of Title IX

Coordinators

Practitioner Report

Role Definition, Organizational Positioning, and Job Qualifications of Title IX Coordinators

The purpose of this report is to share information pertaining to a phenomenological study conducted on the role definition, organizational positioning, and job qualifications of Title IX Coordinators. This report provides data pertaining to the three questions posed by the researcher. The findings represent how an institution defines a Title IX Coordinator (role definition), how the Title IX Coordinator fits into the preexisting university or college structure (organizational positioning), and the qualifications of a Title IX Coordinator (job qualifications). In addition to the findings of the three research questions, this report also highlights a profile of a Title IX Coordinator and suggested recommendations of a Title IX Coordinator.

Background

When Title IX was passed in 1972, the main focus was on sexual discrimination in educational programs. Title IX originated as a law that grew out of the civil rights and feminist movements stemming back as early as the 1950s (Block, 2012). While attention was originally placed on gender equality for women in regard to education, Title IX quickly changed to become a law concentrating on gender equality in athletics. In 2011, the law shifted dramatically to addressing sexual harassment, sexual misconduct, and sexual assault more specifically, discrimination based on sex and educational activities. Equally important, the scope has broadened to encompass all genders including transgendered students. While Title IX has a strong focus on sexual assault, sexual misconduct, and sexual harassment as forms of discrimination, the law went further by

addressing discrimination based on sex, which would also include pregnancy and parental status (U.S. Department of Education, 2015a).

The Office of Civil Rights (OCR), with the deliverance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), made it clear that all forms of sexual violence constituted a violation because college students have the right to be safe from sexual discrimination in an educational setting or educational activities. Title IX legislation also called for educational programming centered on the overarching theme of sexual violence. The call to action from the Dear Colleague Letter (U.S. Department of Education, 2015b) created a trail of various legislation in regard to Title IX and gender discrimination, namely sexual assault on a college campus (Block, 2012). Each piece of legislation brought new components of what a Title IX violation looked like and how a campus should respond. Further, Title IX clearly articulated mandates, which if not met, would be punishable by fines (U.S. Department of Education, 2015c).

One imperative mandate was for each higher education institution to have one Title IX Coordinator who would devote his or her time to Title IX complaints and investigations. According to the Dear Colleague Letter (U.S. Department of Education, 2015b), institutions who receive federal financial assistance will “designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title IX” (U.S. Department of Education, 2015b, p. 6). The Dear Colleague Letter (U.S. Department of Education, 2015b) articulated, minimally, the scope of the Title IX Coordinator’s role and how each Coordinator should have adequate training. The Dear Colleague Letter (U.S. Department of Education, 2015b) does not provide any concrete job requirements, educational levels, or position definitions. Higher education

institutions are struggling to understand and define this role while at the same time trying to find adequate staff to fill it.

Statement of the Problem

When Title IX was introduced in 1972, the government and higher education entities focused on gender equality in athletics (Block, 2012; Hoffman, 2011). Then, K-12 schools and higher education employed either full-time or part-time faculty or staff members as Title IX Coordinators as a means to establish fair and equal athletic practices, which were taking place on and off the field (Taylor, 2005). When the Dear Colleague letter (U.S. Department of Education, 2015b) was written, Title IX took on an entirely new role (U.S. Department of Education, 2015d). With Title IX's newly revised interpretation, students could face discrimination based on whether or not they had been sexually assaulted, specifically when the discrimination potentially could impact students' educational rights (U.S. Department of Education, 2015a).

As a result of Title IX's multiple interpretations, the government mandated that a Title IX Coordinator be employed at every higher education institution including private, public, religiously affiliated, and community colleges (U.S. Department of Education, 2015b). The federal government provided no direction regarding the education, responsibilities, and training of this position. As such, a Title IX Coordinator whose focus lies in the protection of a students' educational interest on a college campus, when incidents of sexual misconduct occur, is a relatively new position. This report will examine research in the area of sexual assault and sexual harassment, centering upon the role of the Title IX Coordinator, a government- mandated university position as it is

defined on a college campus. Additionally, this report will examine the university structure and position qualifications.

Since the Title IX Coordinator has been mandated by the Dear Colleague Letter (U.S. Department of Education, 2015b), little to no information is known about the position outside of it being a directive from the U.S. Department of Education. The problem of practice for higher education professionals is the inability to understand how to work within unclear constraints dictated by the U.S. Department of Education. Title IX Coordinators have been in existence on a college campus originally focusing upon athletic gender equality complaints, but the existence of a Title IX Coordinator position which focuses on sexual violence and pregnancy as discrimination issues is new to college campuses (Hoffman, 2011; June, 2014). With every new position, there is no standard job description nor direction as to where the position falls within the organizational structure.

Purpose of the Study

The Title IX Coordinator position is a fairly new position on a college campus. There have been Title IX Coordinators whose job responsibilities center upon regulating laws pertaining to athletics (Hoffman, 2011; June 2014). Until recently mandated, there have been no Title IX Coordinators whose sole responsibilities lie in regulating or overseeing sexual misconduct laws. Further, there is little to no historical documentation on when the first Title IX Coordinators, focusing on sexual discrimination, began to have positions on a college campus. Nevertheless, the position can be seen as early as a few decades ago, specifically in regards to working with equality among student athletes (Hoffman, 2011; June, 2014; Taylor, 2005). Recently, the Title IX Coordinator position

became more prominent on college campuses when a call to action was made by the government in a response to the increase in number of sexual assaults that have been reported. As well as the way colleges and universities were handling the sexual assault complaints students were reporting. At this time, limited research has been completed about the role, job functions, organizational hierarchy, or even the educational experience of this position.

While the government called for the establishment of a Title IX Coordinator at every college and university, there was nothing in the form of established position guidelines, procedures, funding, or support for the Title IX Coordinator or for colleges and universities which must employ one (U.S. Department of Education, 2015b). The government has determined, by law, that every college and university create this position; however, the position requirements and specific skills needed are left to each college and university to determine what makes a successful Title IX Coordinator. Given such vague guidelines, one could ask the following questions: What education level should this person have which warrants them to be successful? How does this position fit into the overall structure of the university? Furthermore, what is the role of an effective Title IX Coordinator? This study sought to explore all aspects of the Title IX Coordinator role.

Research Questions

There were three research questions guiding this study. All research questions were answered utilizing a qualitative inquiry (Merriam, 2009). The research questions guiding this study include:

- (1) How is the Title IX Coordinator position defined at various institutions? (Role Definition)

(2) Given its government mandates, how does the Title IX Coordinator position fit into the existing structure of a college or university? (Organizational Positioning)

(3) What are the qualifications of a Title IX Coordinator (i.e., education, experience, etc.)? (Job Qualifications)

Design of the Study

Participants and Setting

Interview participants were chosen utilizing a convenience sample model (Fink, 2013). Twelve Title IX Coordinators were interviewed for this research study and reside in the Midwest. The Title IX coordinators worked at varying institutions which include (a) public universities, (b) private universities, (c) community colleges, and (d) religiously affiliated colleges. The Title IX Coordinators interviewed have a range of educational experience and work experience. Additionally, some of the Title IX Coordinators did not have sole job responsibilities in the Title IX area or may have been classified as the Deputy Title IX Coordinator. Of the 12 Title IX Coordinators who were interviewed, two of them were observed for no more than four hours within one day.

Data Collection Tools

This study explored the experiences of Title IX Coordinators within the Midwest on a college or university campus. It was an exploratory approach with a phenomenological design (Creswell, 2009). The researcher sought to understand the experiences of the Title IX Coordinators as described by the participants (see Table 1).

Table 1

Data Collection Tools

Setting	Participants	Data Collection Tool
Two-year public college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log
Four-year public college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Observations Practitioner Log
Four-year private college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Practitioner Log
Religiously affiliated college/ university	Title IX Coordinator	Interviews Artifacts Job Descriptions Practitioner Log

Findings

Role Definition

How is the Title IX Coordinator defined at various institutions? When creating a job description for this position, what were the guiding factors for colleges and universities? The role that compliance and the Office of Civil Rights has in the Title IX Coordinator position are equally important in the definition of a Title IX Coordinator.

Compliance Focused. Laws and policies have measures within their structures for a variety of reasons. At times, those measures may be followed or not followed by the people and/or organizations they have been imposed. Compliance, for the purpose of these findings, is defined as to how Title IX Coordinators comply with guidance from the

U.S. Department of Education and/or the Office of Civil Rights. At times, compliance with such measures can come at a cost or penalty by the issuing authority.

In 2011, the Dear Colleague Letter (U.S. Department of Education, 2015b) was issued by the Office of Civil Rights as a way to assist every college and university in complying with Title IX. Every participant interviewed spoke at some level about the Dear Colleague Letter (U.S. Department of Education, 2015b). The impact of this guidance can be seen not only within the participant interviews but also in the qualifications listed on the job descriptions gathered. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) is the leading informative material when it comes to this type of guidance and is referred to as a Title IX guiding document. Twenty of the 30 job descriptions acquired called for a knowledge of Title IX policies and practices, including guiding documents.

The depth of compliance varies depending on the institution. Some colleges and universities see it as guidance and some see it as mandatory for fear of financial penalties. When the first Dear Colleague Letter (U.S. Department of Education, 2015b) was issued, in 2011, most universities and colleges rushed to create internal infrastructures which would comply with the guidance put forth. Title IX Coordinator G illuminates this by stating:

Our college president got the directive that we needed a contact for discrimination or harassment. He took discrimination to be related to disability [and] put my name on the paperwork years and years ago. Then as the Dear Colleague Letter was released in 2011 that became even more important. (lines 8-10)

One Title IX Coordinator interviewed wanted the Office of Civil Rights to know how they are complying with the guidance. For instance:

It's just like we're doing the best that we can and we think that we're complying with all of their guidance. We look at their letters. We appreciate their help and we're really trying to make our campus an inclusive community. (Title IX Coordinator J, lines 238-240)

Another Title IX Coordinator indicated there was a level of care for the implementation process. Guidance from the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) was not necessarily being employed because of a need but because there was a care for students, faculty, and staff. Title IX Coordinator B expressed:

What I would want them to know is that we really do care, we really take sexual misconduct seriously, most folks who I think I run into who do what I do really care, and they really want to help. (Title IX Coordinator B, lines 209-211)

Conversely from Title IX Coordinator B, Title IX Coordinator H reiterated the importance of such guidance however, challenged the reasons why there needed to be compliance, "If colleges and universities had taken ownership and responsibility for having Title IX Coordinators years ago, maybe they would already [have] the structures in place that are necessary to help eliminate discrimination" (lines 155- 157). Title IX Coordinator H continued these opinions by suggesting:

If society or our campus would get to a point where we didn't have gender discrimination, then I think OCR would feel fine about us not having this role but unfortunately, the effects of years of overt sex-based discrimination and then years of covert or unintentional bias and discrimination that's not going to go

away overnight. (lines 164-167)

Similar to Title IX Coordinator G, other participants expressed the rush to comply with Title IX practices at their institution by way of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b). Title IX Coordinator H stated:

A lot of institutions were unaware or didn't have the ability to fund or hadn't focused on it, so I think that after the Dear Colleague Letter and the guidance a number of institutions decided that it was important to have someone more focused on this work. That's part of why the office was created. (Title IX Coordinator H, lines 27-30)

Title IX Coordinator I echoed the same thoughts as the other Title IX Coordinators by saying "I began it at our institution in 2011 so it was right around the time the Dear Colleague Letter came out" (lines 27-28). Another participant who shared how the position was defined at the institution stated:

I think it was when we first got the first Dear Colleague Letter in 2012. Our president then reached out to a lot of us and said who's the Title IX Coordinator and no one could say who it was. (Title IX Coordinator J, lines 8-10)

Office of Civil Rights Ambiguity. As the Office of Civil Rights produced the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), there have been mixed thoughts and reactions to how much guidance was offered. The Office of Civil Rights seeks to serve students who are discriminated toward but to what end? Of the participants spoken to for this study, there were questions as to how much or how little guidance is or should be coming from the Office of Civil Rights. Either way, the Office of Civil Rights does play a role in Title IX and the guidance surrounding this law, which

is the definition utilized within this finding. Furthermore, the Office of Civil Rights does define the Title IX Coordinator position on a college or university campus given the materials they have published surrounding Title IX. Title IX Coordinator A postulated this notion during the interview by articulating “You as the Title IX Coordinator, you technically report to us, as Office of Civil Rights, but we understand that you are also working for this campus, and so it is this sort of huge regulated mess right now” (lines 125-127).

The Title IX Coordinators interviewed understood this guidance in a number of differing ways. For some of the participants, they described how they tried to work with the Office of Civil Rights on compliance. Title IX Coordinator F spoke twice about the guidance from the Office of Civil Rights. First, “That some of their guidance is too grey and really hard for people to navigate without more specific direction” (lines 190-191). This Title IX Coordinator followed up later in the interview by observing:

Most people are trying to comply with the Department of Justice and the Office of Civil Rights but it’s actually not possible to do that 100% of the time because you have to apply guess work. So how do we know if we got it right or not? (lines 202- 205)

Title IX Coordinator H expressed a need for additional help and also worry for other institutions when describing the Office of Civil Rights’ involvement. This participant worried, along with others, that institutions were not thinking through the spirit of Title IX but doing what was needed to be in compliance. According to Title IX Coordinator H:

I would love for that person at OCR to help strategize and build tools, technical

assistance maybe, in conveying that message and getting the word out. Right now, I'm concerned that too many institutions are just going through the motions or checking a box. (lines 219-221)

As the Title IX Coordinators interviewed expressed concern over checking boxes to be in compliance, there were participants who noted the ambiguity of the guidance the Office of Civil Rights is providing. The participants felt a need to comply with the guidance and have solid guidelines in place; however, some felt concern over the lack of direction. Title IX Coordinator A communicated "When I say clarity, I mean, give me some more things that ... we can actually do and that actually make sense" (lines 324-325). Another Title IX Coordinator provided a comparable thought "I wish the OCR would provide more guidance around for examples. I don't need more guidance" (Title IX Coordinator K, lines 321-322). Likewise, a Title IX Coordinator spoke about the potential Office of Civil Right's involvement regarding additional guidance given the lack of clarity encased within the Dear Colleague Letter (U.S. Department of Education, 2015b). Title IX Coordinator L posited:

if they want to be in the business of recommending and mandating things for campuses to do, then they should also mandate some staffing expectations because that is my biggest challenge, that I am expected to be the coordinator of our response effort. I'm also expected to be the primary investigator. I'm also expected to be the primary person who comes up [with] and implements all of our education efforts. It's barely manageable. (Title IX Coordinator L, lines 227-231)

Realistic or unrealistic expectations set forth by the Office of Civil Rights was another defining piece of the Title IX position. Given the ambiguity of the position and the expectations from the Office of Civil Rights, it was challenging for Title IX Coordinators to grasp how the position should be defined at a college or university. While most Title IX Coordinators wanted more clarity about the expectations, a number of the Title IX Coordinators also felt as if the expectations were unreal; for example, “I think the first thing I would want them [Office of Civil Rights to know] is how unrealistic they can be” (Title IX Coordinator G, lines 167-168). Title IX Coordinator D was able to convey one reason being “the language used by OCR and Title IX - there are conflicting terminologies and ambiguity and it is hard for those of us who live with [and] work on a daily basis to make sense of it all” (lines 256-257). Another Title IX Coordinator said there is conflicting information currently available:

On one hand of Title IX, I am expected to just uphold my institutional policies, investigate those, and [hand] out sanctions as appropriate and then Clery comes back out and says nope, you need to understand the law and you need to...and I wish someone could help clear up some of the confusion. (Title IX Coordinator B, lines 232-234 & 236-237)

Another concern which centered upon the Office of Civil Rights role was the notion of a “one size fits all” premise. Each coordinator interviewed commented in some fashion either for or against this premise. There was a resounding sentiment that the Office of Civil Rights not only had a “one size fits all” premise but also that the Office of Civil Rights “painted from the same paintbrush” when it came to guidance. Title IX Coordinator I expressed:

It's meant to have a process; it's meant to prevent institutions from sweeping situations under the rug and from not addressing them, but sometimes the one size fits all approach doesn't work for all institutions of so many different types or so many different sizes and that when we don't have enough flexibility to adopt procedures for how things are going to work on our campus, it sometimes ends up hurting the people, the students, the faculty, the staff that the guidance is meant to protect. (lines 302-305)

Title IX Coordinator D shared the same thoughts as Title IX Coordinator I when reflecting on the involvement of the Office of Civil Rights:

The issues are different. The resources are different. I think that needs to be taken into account when OCR is looking at telling an institution what they need to do. I think that that's a challenge when you have one governing body for the entire country. (lines 271-274)

On the contrary, Title IX Coordinator F disagreed with the opinion that the Office of Civil Rights does "paint[ed] from the same paintbrush." Title IX Coordinator F argued:

I guess I would say that they have to paint from the same paintbrush across all institutions – it's not quite true because they do have exceptions for religious institutions and same sex [institutions] so it's not entirely true – that part doesn't bother me. They have to create standards that would apply to everyone who with exceptions but that isn't my complaint about them. (lines 196-200)

In agreement with Title IX Coordinator F, Title IX Coordinator H felt the same way about the Office of Civil Rights/Department of Education's involvement. Title IX

Coordinator H went further to challenge individuals who might think the guidance is similar no matter what type of institution:

I think there's some really smart people at the Department of Education who have to develop policy guidance for institutions that are very different, but that's no different than any other entity of the fourth branch of the government, right?

Regulators do have to paint with a broad brush. It's important that institutions think about how they can best respond to the changes and requirements that are being implemented. (lines 148-152)

In summary, the Title IX Coordinator position, at a given institution, has been defined by the guidance from the Office of Civil Rights. Two white papers published by the Office of Civil Rights, both the 2011 and 2015 Dear Colleague Letters which provide minimal guidance surrounding how a Title IX Coordinator is defined (U.S. Department of Education, 2015b; U. S. Department of Education, 2016e). While there has been minimal guidance provided by the Office of Civil Rights on this position, colleges and universities continue to desire compliance with the Office of Civil Rights guidance.

Organizational Positioning

The Title IX Coordinator position was mandated from the Office of Civil Rights. When a position is newly created at an institution, who supervises that person? Is the position part of a new office or an existing one? How does a mandated position, from an entity outside of the institution, fit into the already existing structures which are in place? The findings below seek to answer those questions.

Supervision Reporting Lines. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) called for all colleges and universities to employ a Title

IX Coordinator; however, in 2015 the Office of Civil Rights published an additional Dear Colleague Letter (U.S. Department of Education, 2016e) which urged that the Title IX Coordinator should be supervised by senior leadership, such as the university president. Supervision was not defined within the published letter but for the purpose of this research, supervision includes guidance, leadership, mentorship, and support of the employee. It also includes a direct reporting line from the supervisor to the supervisee, as seen in the institutional organizational chart. Supervision is defined as the person who is directly supervising the Title IX Coordinator through a reporting line on the organizational chart.

A bold statement was made by the Office of Civil Rights when it was suggested supervision of the Title IX Coordinator come from the college or university president. Title IX Coordinator F speculated the reason being that complaints “can involve anybody at the university and the point of [being a] direct report to the university president is to remove anything that might be seen as a barrier to fair and accurate investigations” (lines 88-90). Seven of the 12 Title IX Coordinators interviewed directly reported to the president. Title IX Coordinator L commented on the importance of supervision from the president:

I feel like being a direct report to the president of the university does help me to maintain the level of independence that’s important for my function on campus, but it is challenging because I don’t have a lot of direct supervision in the strictest sense. I have to identify what needs to be done and just get it done. (lines 139-142)

Title IX Coordinator I was able to affirm the importance of supervision by the president when stating:

I'm really fortunate because our president believes in what we're doing. He's compliance minded. When we told them that we needed to add certain things to our equal opportunity policy, like gender expression, he gets it. One of the first things he did when he came here was add sexual orientation on there and gender identity, so he is aware of these types of issues and is understanding of these types of things, so I think we get a great deal of support or I think we sometimes could get more support if things that may just be out of our control right now... But as far as being educated and being aware that our area is an important area, we at least have that support. I've heard some nightmare stories from other areas. It's like oh no, I'm so sorry you have to deal with that. We're really blessed.

(lines 206-211;214-216)

In addition to the importance of support from this position, being supervised by the president brings with a sense of importance from the university community when it is a direct report. Title IX Coordinator B voiced:

To place it anywhere else would have been too narrow of a view at the institution. [Due to] the culture of our institution, it won't take be taken seriously if it is not elevated to the right level in our organizational chart. (lines 62-65)

Similar to Title IX Coordinator B's belief, Title IX Coordinator D, who is a Deputy Title IX Coordinator, spoke to the structural reporting line appearances:

I think that in order for us to have the institution see the importance of the work having her report to the president does give some credence to that. I think it also

gives her some clout as far as decision making is concerned, and it also frees her up from conflicts of interest for the most part. (lines 116-119)

For the seven Title IX Coordinators who report to the president, there is also some co-supervision by other senior leadership on campus. The majority of the co-supervision comes from the general or legal counsel at the institution. General or legal counsel who supervise Title IX Coordinators are doing so by the Title IX guidance, and at times, by convenience. When asked about the reporting lines, Title IX Coordinator F admitted:

I mean the reality is that I have more oversight from the legal office than I do from him [the president]... There has actually been a real benefit to being in the legal office because I mentioned in one of my earlier answers there are so many legal issues involved in Title IX, and she is a wealth of information about it (lines 118-119 & 124-127).

Sometimes there is a convenience associated with working with legal counsel as well. When asked about working with legal counsel as opposed to the president, Title IX Coordinator I replied “On a daily basis, definitely our legal counsel because I see him, my office space is in their office space, so I see him on a much more frequent basis” (lines 221-222).

At times, the Title IX Coordinators are supervised by senior leadership outside of the president and general or legal counsel. Five of the 12 Title IX Coordinators interviewed are supervised by a variety of other college and university officials. Of the 30 job descriptions collected, 14 specified a reporting line for the Title IX Coordinator position to someone other than the president (artifacts 1-14). Additionally, 11 organizational charts were collected which included five Title IX Coordinators who

reported to senior leaders who were not the president (artifacts 31-36). While this is different than the guidance from the Dear Colleague Letter (U.S. Department of Education, 2015b), the supervision lines work well for the institutions. Likewise, the Title IX Coordinators who are supervised by someone other than the president, do have access to the president and the available support is present. In response to questions pertaining to supervision lines, Title IX Coordinator H noted how this position does not regularly report to the president but to the executive vice chancellor/ provost. This Title IX Coordinator offered:

I think that's unique to each institution because the Title IX administrator needs to have some level of autonomy especially if they're in a climate where some of the work that needs to get done may be politically unpopular or if their office has any investigative role. (Title IX Coordinator H, lines 135-138)

Structural Considerations. The coordination of Title IX efforts did not traditionally begin with a Title IX office already intact. Dating back to the origins of Title IX, most schools had created Title IX positions, which were housed in athletics, due to believing this was a compliance issue (Waterson, 1987). Then again, there were also schools which would handle these complaints through the student discipline process under harassment (King, 2012). Structure, by definition, is the underpinnings or foundation of an organization. In exploring how the Title IX Coordinator position fits into the existing structure on a college campus given the government mandates, the Title IX Coordinators who were interviewed provided noteworthy examples on the creation of their offices within the existing organizational structure.

The Title IX Coordinators who were interviewed spoke to the origins and history of their office. Three of the Title IX Coordinators interviewed were instrumental in the creation of their offices. Title IX Coordinator K shared the following information:

The position kind of existed on paper but wasn't truly being lived out. I just, really because of my involvement with ASCA [Association of Student Conduct Administrators], I had a lot of knowledge and content expertise around Title IX as well as from my prior positions. I actually did a lot of the Title IX coordination before it was formally a part of my duties. Then our dean of students left for another position...and then [Title IX] officially became part of my job as people realized, wow, you're actually good at this and doing this. It just happened kind of organically over a couple of years. (lines 20-25)

Title IX Coordinator I had a comparable situation to Title IX Coordinator K when this position was created. This participant had been working at the institution in a different office but was the catalyst for movement in the creation of a Title IX area. This Title IX Coordinator explained:

I was actually holding the director of student conduct position at the time, and I had helped with getting that mission together and helping to communicate we definitely need to do this. Then when the position came around I [thought] you know what, I would be really good for that, so I put in for it and was selected. (Title IX Coordinator I lines 15-18)

Title IX Coordinator A was working at the institution when asked to move into the position and noted:

Originally, I was hired to be doing student conduct. So I have been here for

about a year and a half doing student conduct and being a Title IX investigator.

And the institution made a decision they wanted to move forward with a full-time Title IX Coordinator, and so they asked if I would be willing to step into that position. (lines 4-7)

Prior to the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), Title IX violations were being adjudicated through the student discipline process (King, 2012). The evolution of a Title IX office from another office on campus, such as student conduct, is telling. When speaking to the Title IX Coordinators interviewed, they spoke of the origins of their offices as an offspring of the student conduct office. Title IX Coordinator L offered the following feedback:

As the institution was becoming increasingly aware and responding to increasing pressure from OCR to increase its ability and effectiveness in responding to Title IX complaints, specifically there was a lot of shifting around within the way this Institution handles sexual assault complaints. For about a year, or two years, the office of student conduct handled sexual assault matters as kind of an outgrowth of the student conduct structure, but I think there was some recognition that there needed to be some separation, ... the guidance from OCR was that there needed to be some specific and separate process pieces in place. (lines 23-31)

To summarize, the supervision of the Title IX Coordinator, as articulated by the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) was that the institution president would be the direct supervisor. The message behind this direct reporting line was clear and profound – it was important. While Title IX Coordinators

are being supervised by the president at some institutions, they are being supervised, supported, and mentored by other top university administrators as well. The supervision reporting lines are based on the organizational capabilities of the institution. The intersection with legal counsel and the Title IX position are evident as well. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) offered very little guidance on the structure of a Title IX Coordinator position, and institutions were left to figure out the best way to accommodate this position in their current organizational structures.

Job Qualifications

What makes a successful Title IX Coordinator? What type of education should a Title IX Coordinator have or what can of qualities should a Title IX Coordinator possess? The three themes which emerged were education, qualifications/ skills, and training and resources.

Education. Education can be defined in many ways and mean different things to different people however, for the purpose of this study the researcher chose to focus on the level of degree obtained. The researcher acquired 30 current job descriptions from college and university websites. Most college and universities note a preferred and required degree obtained on job announcements. What emerged from the job descriptions found on websites was a broad spectrum of degrees that a college or university required or preferred for the Title IX Coordinator position. Most of the colleges and universities wanted a master's degree as the required level of obtainment. There were a small number of colleges and universities where the obtained allowable degree was a bachelor's degree. When there were instances of colleges and universities

calling for a bachelor’s degree only, there was also an additional requirement of years of experience. In addition to a broad spectrum of degrees preferred or required, colleges and universities would state more than one degree could fulfill said requirement. For instance, one university’s qualifications stated “Master’s degree in related field, such as Public Administration, Human Resources Management or Law preferred” (Artifact 1). The following table illustrates the break-down of degrees with the highest frequency that colleges and universities, given an internet search, are seeking in regard to the Title IX Coordinator position as found in the study’s artifacts.

Table 2

Degree Requirements of Title IX Coordinators

Requirement	Number of Colleges/ Universities
Juris Doctorate	17
Generic - Master’s Degree	16
Higher Education - Master’s Degree	5
Human Resources – Master’s Degree	3
Psychology – Master’s Degree	2
Public Administration – Master’s Degree	2
Social Work – Bachelor’s Degree	1
PhD/ EdD	1

Conversely, of the Title IX Coordinators interviewed, sentiments regarding the type of degree necessary were different, as noted by the participants, than the posted job descriptions. Of the 12 Title IX Coordinators interviewed, one Title IX Coordinator

advocated the Juris Doctorate as being a preferred degree for this position. The participant stated:

I think having a legal background in it is helpful because of the whole terrain of Title IX has become so highly charged it is a huge vulnerability for any institution and it is wise to be thinking of all of our decisions around Title IX through the lens of potential litigation (Title IX Coordinator F, lines 29 – 31).

The other 11 Title IX Coordinators did not disagree that having a law degree would be helpful; however, the opinions centered upon the notion of legal training and comfort with legal components. Title IX Coordinator K felt “I don’t necessarily think you need a JD but you’ve got to have an understanding of case law and applicable laws, et cetera...” (lines 90-91). Similarly, the Title IX Coordinators felt legal knowledge was a skill which could be acquired through training. For instance, Title IX Coordinator L stated:

I don’t think there is anything sacred about having the legal credential. I think there’s a lot of excellent training out there that’s very focused on the compliance piece in higher ed that can be adequately prepare someone who hasn’t had a formal legal education to be very effective in their role. (lines 88-90)

A degree in higher education, college student personnel, or student affairs where college student development is a primary course of study was a reoccurring point when the Title IX Coordinators were asked about educational credentials. Similar to the job descriptions obtained, the interviewed participants felt these degrees would be necessary. Title IX Coordinator K affirmed these sentiments by articulating “I think some experience working with students obviously” (line 96). Title IX Coordinator I shed light

on this topic by speaking to the benefits of having experience with students while also having a law degree. Title IX Coordinator I expressed:

You have to know how to work with them, how to speak with them, how to do the student development side of conduct work and just going to law school I don't think really gives you that. Then by the same token, if you're not educated on the legal background and framework that we're working in you can find yourself in hot water pretty quick. (lines 93-97)

Qualifications/skills. In addition to educational background, most job descriptions also called for qualifications which make a candidate desirable to hire. Qualifications can include experience and skill abilities. Furthermore, experiences and skills can range from computer abilities to certifications from trainings and workshops. Qualifications are defined as qualities which enable an individual the ability to do work.

Table 3

Experiences of Title IX Coordinators

Experience	Number of Colleges/ Universities
Title IX Compliance	20
Investigations	14
Compliant Resolution	8
Legal	7
Student Conduct	6
Student Life	5
Human Resources	5

Likewise, skills are defined as competencies which enable an individual the ability to do work. The Title IX Coordinator job descriptions and participant interviews were congruent in the area of qualifications. After a review of the qualifications desired by colleges and universities in the job descriptions, Table 3 represents reoccurring experiences.

Title IX Compliance and experience working with Title IX laws, policies, and procedures was frequent throughout 20 of the 30 job descriptions obtained. Accordingly, the Title IX Coordinators who were interviewed spoke to these experiences as well. A number of the participants spoke to their experience working with Title IX laws or their experience with the Dear Colleague Letter (U.S. Department of Education, 2015b) as to how they were able to obtain their current positions. Title IX Coordinator K expressed “I also was pretty up-to-date on the Dear Colleague Letter, any of the resolutions that were coming out” (line 35). Title IX Coordinator B echoed the same thoughts as she spoke to the level of Title IX work she does on a daily basis which would lend this position to being familiar with Title IX compliance. “And I can tell you there are a number of day-to-day Title IX [issues] ... I answer a lot of questions and I talk to a lot of folks” (Title IX Coordinator B, lines 42-43). In agreement with statements such as the later, Title IX Coordinator J simply stated “Know your state statutes” (line 89).

Two of the 12 interviewed Title IX Coordinators had the opportunity to create their own job description prior to applying or entering the position. Both Title IX Coordinators spoke of the importance of certain documents, laws, and policies which an individual who was employed in this position should know. When Title IX Coordinator A was creating the job description for the current position, she described what was

helpful in that design. "...the April Dear Colleague Letter was released or Dear Title IX Coordinator had been released which basically outlines what they foresee a Title IX Coordinator's position doing" (Title IX Coordinator A, lines 156-157).

After Title IX compliance, investigation work or knowledge of conducting investigations was a priority for the sample of college and university job descriptions reviewed. Title IX Coordinator K elaborated on this qualification by:

Certainly experience in training and conducting investigations. Everything from how do you help someone feel comfortable enough to open [up] to you, how do you put out questions in a way..., how do you take notes, how do you summarize, all those things. (lines 84-86)

A majority of the Title IX Coordinators who were interviewed liken the work of conducting investigations to a skill they had learned through their experiences with student conduct work. As seen in Table 3, student conduct work was also a highly sought after qualification for this position. Of the 12 Title IX Coordinators interviewed, seven participants had either worked previously in student conduct or had some experience working in student conduct. The connections to the Title IX work they are doing currently was clear and present as to why this would be a qualification; for instance:

I am the person who conducts student discipline ...so you know I am familiar with the investigatory process in student discipline and you know the hearing process and documentation and sanctions and record keeping of all of that. (Title IX Coordinator B, lines 13-16)

Title IX Coordinator J articulated the intersection of student conduct qualities and skills with Title IX work expressed:

I think it's the same that we have with a lot of student conduct. Having due process, being able to hear both sides of the story. There's always two sides... trying to be fair...being rationale. Making good decisions based on the information you have. It's like we have for a lot of the other investigations we do, except the stakes are higher, the experiences are more serious depending on the case. The Title IX violations are all over the board. (lines 215-219)

The role of a Title IX Coordinator can be complex as this individual needs to work with both a student who has been accused of a Title IX violation and a student who is filing a complaint. Regardless of the role of the student, the Title IX Coordinator must treat each student the same. All of the Title IX Coordinators interviewed shared their thoughts on how they work equitably with students.

A reoccurring pattern from all of the Title IX Coordinators interviewed was how equitable they had to be within these sensitive situations to each party. Title IX Coordinator A communicated that a person will "...look at things from an equitable standpoint, from all angles, you know I can't prejudge somebody based on information I am receiving. I have to be able to be caring and compassionate and resourceful for all sides..." (lines 32-34). Title IX Coordinator F spoke about equity in regard to being comfortable; for instance, "Feeling comfortable with people who are accused of this just as you are comfortable with people who might have been victimized by this" (lines 57-58). Title IX Coordinator L shared similar thoughts to Title IX Coordinator A and Title IX Coordinator F and stated:

A high degree of emotional intelligence...is absolutely key, not only in helping to make sense of complicated interpersonal situations, but also to

communicate compassionately with students no matter what their role in the situation. To be able to hear their perspectives, to be compassionate with what they're throwing at you, and trying to figure out constructive ways to manage not only their strong feelings, but also the logistics of their life. (lines 73-38)

Training. While previous education and qualifications/skills are an important piece of the Title IX Coordinator position, the individuals also require training in a variety of areas. Training, for the purpose of this research, is experiences that enhance an individual's ability to do work. Since the release of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), training sessions and resources that are specific to Title IX and Title IX Coordinators have been created by umbrella groups. Two of those groups are the Association of Title IX Administrators (ATIXA) and the National Center for Higher Education Risk Management (NCHERM). Both organizations were spoken of by the Title IX Coordinators interviewed when asked about training and resources. In addition to the two groups mentioned above, the Association for Student Conduct Administrators (ASCA) was also a cited source by the Title IX Coordinators. Three of the 12 Title IX Coordinators interviewed spoke about the training sessions offered by the ATIXA group as a source of knowledge.

Title IX Coordinator B, Title IX Coordinator G, and Deputy Title IX Coordinator D all attended the multi-day Title IX investigator training offered by ATIXA. Title IX Coordinator G stated "Training. I try to attend conferences and trainings as much as economically feasible. Fortunately, my institution is very gracious in funding training opportunities..." (lines 110-111). The other Title IX Coordinators attended training sessions as well but attended through smaller, not as well-known organizations due to the

cost associated with the ATIXA trainings. Deputy Title IX Coordinator J voiced “We’d like to be able to do more. I don’t have an unending travel and professional development [budget], but we again, we try to do as many [as we can]...” (lines 184-186).

In addition to the training offered by the national organizations cited above, some of the Title IX Coordinators shared their experiences with training sessions which take place through webinars or are presented locally. The training the Title IX Coordinators mentioned as pertinent to this position centered on conducting investigations, sexual assault and sexual misconduct education, and victim advocacy. Either way, training was seen as beneficial to be up-to-date within the profession by the Title IX Coordinators interviewed. Title IX Coordinator K justified “I do think that there needs to be some... training...” (line 79).

The Office of Civil Rights has not provided a clear definition on what the qualifications of a Title IX Coordinator are or should be. Furthermore, the Office of Civil Rights has not stated there be any concrete qualifications to hold the Title IX Coordinator position. The data presented suggests colleges and universities are at least requiring a master’s degree as the highest level of college degree obtained. The Office of Civil Rights has not mandated the type of skills or training necessary, either; however, colleges and universities are finding a knowledge of Title IX compliance to be beneficial.

To summarize, this section provided an examination of the findings which were collected concerning the experiences of Title IX Coordinators and answering the three research questions posed. The themes reflected within the findings encompass areas such as compliance focused, Office of Civil Rights ambiguity, supervision reporting lines structural considerations, education, qualifications, skills, and training.

Discussion

This phenomenological study of Title IX Coordinators showcased the experiences of this position when it has been mandated by the Office of Civil Rights and created within a structure that has already been established. The research found evidence of themes which centered upon (a) compliance focused, (b) Office of Civil Rights ambiguity, (c) supervision reporting lines, (d) structural considerations, (e) education, (f) qualifications/skills, and (g) training and resources.

Compliance Focused

In 2011, the Office of Civil Rights issued a Dear Colleague Letter (U.S. Department of Education, 2015b) to every institution of higher education. While most colleges and universities were unsure of what guidance the Office of Civil Rights could provide to them, the Title IX Coordinators interviewed shared how this document shaped the Title IX Coordinator position today. Whether or not there is compliance with the directives of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) currently is not an issue as, at some level, there is compliance with this document. Not only was the impact of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) shared through the interviews but it can also be seen within the job descriptions obtained.

Twenty collected job descriptions articulated a knowledge of Title IX policies and practices as qualifications of a Title IX Coordinator. Those policies and practices can be seen in the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b). In comparison to the collected job descriptions, every Title IX Coordinator interviewed spoke on some level about the 2011 Dear Colleague Letter (U.S. Department of

Education, 2015b). This document, while unsure to college and university administrators on how it is able to distribute mandates from an outside governmental entity, is an essential piece to the composition of what makes a Title IX Coordinator. The Title IX Coordinator position would be incomplete without the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) as a document which provides guidance to comply. This document is the backbone of the Title IX Coordinator position as it provides the overall structure of what the overarching duties should entail, what the person should focus his or her efforts upon, and how the position should be operating. If a Title IX Coordinator is new to his or her position or is unsure of his or her duties, compliance with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) is crucial.

Office of Civil Rights Ambiguity

The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) was published by the Office of Civil Rights which, in turn, is the government entity advocating, creating, and interpreting Title IX. The Title IX Coordinators interviewed expressed a number of thoughts about the involvement of the Office of Civil Rights. Their thoughts ranged from feelings of low level involvement when there was a need for more guidance to unrealistic expectations set by the Office of Civil Rights. Whatever the level of involvement, the Title IX Coordinators were clear about needing more guidance and answers to questions from the Office of Civil Rights. The Office of Civil Rights is directly mandating a position to be on a college or university campus while not providing details on all facets of the Title IX Coordinator position.

Conversely, when the Office of Civil Rights does provide details, there were some Title IX Coordinators who felt the guidance was the same across each and every

institution no matter the type of college or university. Those Title IX Coordinators who shared their sentiments about the Office of Civil Rights maintaining a “one size fits all” premise also expressed challenges with this premise. The challenges surrounding the “one size fits all” notion was encapsulated by a need for the Office of Civil Rights to not dictate blanket guidance to all colleges and universities. Other Title IX Coordinators recognized the “one size fits all” guidance mandated by the Office of Civil Rights but welcomed it and challenged those who might see issue with the process. These Title IX Coordinators saw the blanket guidance across colleges and universities as a way to think critically about their own institutional policies and practices while also remembering that the Office of Civil Rights does allow for exceptions.

Supervision Reporting Lines

One universal statement made by the Office of Civil Rights pertains to supervision of the Title IX Coordinator. The Office of Civil Rights was clear in the 2015 Dear Colleague Letter (U.S. Department of Education, 2016e) that the Title IX Coordinator was to be supervised by the institution’s president. The Office of Civil Rights did not define what supervision would look like; however, the Office of Civil Rights was bold in the philosophy behind this declaration. The Title IX Coordinator, as a stand-alone position reporting to the top administrator on a campus, sent a strong message not only to those individuals who applied for the position but also to members of the campus community. This importance was documented in job descriptions and organizational charts. After a review of current job descriptions and organizational charts collected, 23 Title IX Coordinators were supervised by the college or university president.

The Office of Civil Rights' message was clear that the supervision of the Title IX Coordinator by the president was important. Seven of the Title IX Coordinators who were interviewed shared the importance of directly reporting to the college or university president. These seven Title IX Coordinators articulated the importance lies with the support offered by the president, the independence of the position offered by the president, and the seriousness in the eyes of the community. A direct reporting line to the president also wields a high level of legitimate power (French & Raven, 1959/2005). For instance, when the president dictates who will report directly to him or her, the individuals under the president take note of the legitimacy associated with that stance. This was essential to the participants because the issue of Title IX was so important.

In addition to the Title IX Coordinators reporting to the president, there were Title IX Coordinators who were co-supervised or directly supervised by other senior leaders. In the 2015 Dear Colleague Letter (U.S. Department of Education, 2016e), the Office of Civil Rights speaks to the expectation that the Title IX Coordinator receive support from their institution. The relationship with general or legal counsel was realistic, and at times, out of convenience. In terms of the other reporting lines, the supervision happened because of how well it worked for those institutions. Once again, supervision reporting lines were not a "one size fits all" as mandated by the Office of Civil Rights (U.S. Department of Education, 2016). For the five Title IX Coordinators interviewed who were not directly supervised by the president, there was still support from and access to the president.

Structural Considerations

The concept of a Title IX Coordinator with the issuance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) was vague by the Office of Civil Rights on the definition of this position. The 2011 Dear Colleague Letter stated that each college and university was to “designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title IX” (U.S. Department of Education, 2015b, p. 6). Simply stated, the Office of Civil Rights only mandated a staffing structure of one.

In the early stages of this mandate, there were zero examples of which office the Title IX Coordinator would be housed out of or if there were staff members reporting to the Title IX Coordinator. What was evident was the pressure associated with creating a position when there might not have been currently a position at the institution. There was a rush for institutions to create a position so there could be compliance. For three of the Title IX Coordinators, they were influential in the creation of not only the position but an entire office. The origins of the Title IX Coordinators who participated in this research can also be seen derived from student conduct or discipline practices and offices. Additionally, there are comparable attributes of the Title IX process to the student discipline process which may explain the origination. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) spoke to these origins by illuminating the relationship between the two processes.

Education/Qualifications/Skills/Training

Limited to no mention is made regarding the degree attainment, qualifications, skills, or training for a Title IX Coordinator within the 2011 or 2015 Dear Colleague

Letters (U.S. Department of Education, 2015b; U.S. Department of Education, 2016).

The guidance in these areas is quite vague as dictated by the Office of Civil Rights. It is unclear as to why the Office of Civil Rights has provided limited to no guidance in this area; however, it has provided ambiguity for college and university staff who create the Title IX Coordinator job description for their campus. Prior to the issuance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), sexual violence, assault, and misconduct was being adjudicated out of the student conduct or student discipline offices (King, 2012). This can be seen in the findings as participants spoke to the origins of their current office. Skills which are similar to the work of the student conduct or discipline offices can be seen in Title IX work. Based on the job descriptions obtained through this research, there is no norm regarding education outside of a master's degree preference. The data leans toward a stronger preference for a juris doctorate. With that being said, the Office of Civil Rights has provided zero guidance in the area of education.

In 2015, a follow up Dear Colleague Letter (U.S. Department of Education, 2016) was sent to higher education institutions elaborating on the Title IX Coordinator specifically. Within this letter, the Office of Civil Rights highlighted training. Nonetheless, what was not clear within this letter was what was the appropriate training and who delivers the training (U.S. Department of Education, 2016)? Currently, Title IX Coordinators are receiving training and resources from a multitude of outlets (e.g. online, web-based, in-person, and one-on-one mentoring).

Title IX Coordinator Profile

What defines the Title IX Coordinator? Who supervises the Title IX Coordinator? What educational background, qualifications, and skills makes a successful

Title IX Coordinator? Moreover, what training should the Title IX Coordinator receive? What are the qualities a Title IX Coordinator should possess when applying for this position? What are the characteristics of the Title IX Coordinator?

After an analysis of the data, the Title IX Coordinator is concerned with the guidance offered by the Office of Civil Rights. Furthermore, the Title IX Coordinator wants to comply with said guidance. Title IX Coordinators not only value the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) as a hallmark document for their position but also refer back to it when making decisions, creating policies, and upholding the values of their job. One of the qualifications in a number of the job descriptions acquired in this study were knowledge of Title IX work and knowledge of Title IX compliance. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) is the leading document on Title IX, Title IX compliance, and the Title IX Coordinator. Given that the 2011 Dear Colleague Letter is the leading document, it makes sense that proficiency in this document is a quality a Title IX Coordinator should possess (U.S. Department of Education, 2015b). In addition to the Title IX Coordinator relying on the 2011 Dear Colleague Letter, it also places prominent respect among the Title IX Coordinator to comply with this document (U.S. Department of Education, 2015b).

Besides complying with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b), the Title IX Coordinator wants to cooperate and build relationships with the Office of Civil Rights. Part of the relationship a Title IX Coordinator seeks from the Office of Civil Rights is the ability to move away from checking boxes to getting the job done. A Title IX Coordinator needs to be able to establish and maintain a working

relationship with the Office of Civil Rights. Currently, Title IX Coordinators seek more direction and guidance from the Office of Civil Rights. As there is ambiguity in guidance from the Office of Civil Rights, a Title IX Coordinator will need to work within this ambiguity. The Title IX Coordinator needs take on a leadership role where he or she is comfortable with ambiguity because the Office of Civil Rights will not be offering clearer guidance. Title IX Coordinators hope that the Office of Civil Rights can see each institution for their own differences and not expect a “one size fits all” model. To challenge the notion of “one size fits all,” a Title IX Coordinator needs to be an advocate for his or her home campus. As the landscape for Title IX work on an institution of higher education campus continues to gain momentum, the Title IX Coordinator is an individual who is not afraid to interpret the law for the betterment of their campus while maintaining the spirit of said law.

A Title IX Coordinator is supervised by the highest leader at the institution, the president. Additionally, the Title IX Coordinator wants to be supervised by the president. Accordingly, supervision by the president is essential to ensure a mandate is carried out to its fullest extent when an error in the mandate could be punishable by enormous fines. For the Title IX Coordinator to be successful, the campus community should have buy-in. Supervision by the president enables this success. Additionally, the Title IX Coordinator also has a relationship with general or legal counsel on their respective campus as the legal landscape of Title IX warrants such a relationship. Title IX Coordinators, currently, are leaders, and often times, pioneers in their work. At times, the Title IX Coordinator is creating the structure of his or her office as well as creating and setting policies and

procedures from nothing. For some Title IX Coordinators, this stems from the work they might have done in the area of student discipline or student conduct.

Title IX offices and even the position of Title IX Coordinator is relatively new on a college campus. As such, there might not be as much structure associated with the Title IX office or Title IX Coordinator position as expected. Individuals who obtain a position as a Title IX Coordinator need to have some level of comfort with limited structure. Moreover, an individual in the Title IX Coordinator position needs to have a vision of where the office and position should be headed in the future. A Title IX Coordinator needs to be able to lead with or without a staff.

While the findings of this study do not point directly to a specific degree obtained by a Title IX Coordinator, it is clear the Title IX Coordinator does need a degree higher than an undergraduate degree. It is suggested that a master's degree is required for this work. With master's level work comes a higher degree of critical thinking and problem-solving skills which a Title IX Coordinator needs when trying to discern between fact and perception of the reported incident. An individual with a master's degree typically has a higher order of thinking which helps to delineate between "grey" matters. There were job descriptions acquired which called for a juris doctorate as a preferred degree; however, there are Title IX Coordinators who do not hold that degree who are successful in this position without a juris doctorate degree. Although there are skills and qualities which can be derived from a juris doctorate degree for this position, there are other ways to obtain those skills and qualities such as training and on the job guidance. The priority in degree obtainment for a Title IX Coordinator remains to be the master's degree.

In addition to a master's degree, the Title IX Coordinator should possess certain skills and experiences. One of the skills or experiences the Title IX Coordinator should possess is the ability to critically problem solve situational experiences. A main job duty of the Title IX Coordinator position is to conduct investigations, which may result in a Title IX violation. Once again, the ability to discern between fact, perception, and opinion are critical for the Title IX Coordinator. Likewise, the Title IX Coordinator needs to be able to ask thought-provoking questions which paint a picture since the Title IX Coordinator has not been directly involved in the incident and will finalize the investigation by creating a report for another party. The ability to probe and prod, in a professional manner, are additional skills which a Title IX Coordinator should possess. Conversely, the Title IX Coordinator needs the ability to treat each party involved in a Title IX investigation fairly and impartially until the investigation findings are complete. A Title IX Coordinator should possess the ability to make a conclusion on an investigation and offer a recommendation or finding. Once the investigation finding has been made, the Title IX Coordinator needs to be an advocate for the compliant or victim through the student discipline process.

Similar to creating and maintaining relationships with the Office of Civil Rights, the Title IX Coordinator needs to do the same with university or college faculty and staff members. Likewise, the Title IX Coordinator should build a coalition of university and college faculty and staff. A key element of the work the Title IX Coordinator completes at a university or college is to advocate for the complainant or victim, as well as the respondent, to have as few disruptions to the educational experience. Equally important, as the Title IX Coordinator is able to secure relationships with faculty and staff, the Title

Title IX Coordinator is then able to utilize those individuals in combating sexual violence on a university or college campus. It is through the relationships with faculty and staff that a Title IX Coordinator is able to understand the political nature, underpinnings, and culture of an institution of higher education.

In the same way the Title IX Coordinator should have relationships with faculty and staff members, the Title IX Coordinator should have relationships with the student body as well. Given the data on sexual assaults and sexual misconduct happening on a college or university campus, the typical reporter of Title IX misconduct will most likely be college students. A Title IX Coordinator should have experience working with adult aged students. College students are developmentally at a different level than children. With that being said, the Title IX Coordinator will need to have a presence on campus with students to ensure the students feel comfortable not only in reporting but also participating in the investigation.

Title IX Coordinators are not only expected to investigate complaints related to sexual misconduct and sexual violence, but also expected to provide programming and advice for the campus community. The Title IX Coordinator position is one where an individual needs to be able to multi-task. On a daily basis, as articulated by some of the Title IX Coordinators interviewed, a Title IX Coordinator is speaking to a number of people generally about Title IX. Specifically, the Title IX Coordinator is the sole authority on Title IX at a given institution. As such, a Title IX Coordinator needs to be able to move fluidly throughout the day, managing tasks which might arise unexpectedly. Overall, the work of a Title IX Coordinator is complex, and the individual who obtains a position working as a Title IX Coordinator needs to be able to adapt to the complexity.

Gender may have a role in who is a Title IX Coordinator. Through this study, there was no mention of gender or ethnicity; however, an overwhelming number of Title IX Coordinators are female. There was, and is, a lack of gender diversity within the Title IX Coordinator position. The gender of the individual employed in the Title IX Coordinator position is irrelevant, but what is relevant is the individual's ability to be empathetic and relatable to the complainant while also having the ability to empathetically collect information from the respondent. Also important is the ability of the individual to be competent in the work of the Title IX Coordinator position.

In conclusion, the Title IX Coordinator values the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) as a guiding document, the Title IX Coordinator wants a relationship with the Office of Civil Rights, and the Title IX Coordinator should be supervised by the highest leader at the institution, the President. Furthermore, the Title IX Coordinator needs to have a degree higher than an undergraduate degree and possess specific skills and qualifications including some skills which are related to relationship building.

Recommendations

This research was not meant to be a complete picture of the role of the Title IX Coordinator but to shed light and insight about this new position. The research was also meant to be a closer viewpoint of the experiences of the Title IX Coordinator for the Office of Civil Rights. Given the issuance of the 2011 and 2015 Dear Colleague Letters (U.S. Department of Education, 2015b; U.S. Department of Education, 2016) and the mandates contained within those documents being relatively new, this research was offered as a way to begin a closer examination of the structure, definition, and

qualifications of the Title IX Coordinator. This section will offer recommendations for practice based on the data obtained.

Office of Civil Rights

The data obtained from this research can help inform the Office of Civil Rights on the importance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) and an institutions' desire to comply with said document. Regardless that the Office of Civil Rights is not an entity on each and every college and university across the nation, there is a strong presence for policy and procedures on campus. Further, the research indicates the significance of the 2011 Dear Colleague Letter as an important foundational document for the Title IX Coordinator. The 2011 Dear Colleague Letter was the inaugural position of mandating a Title IX Coordinator and that is significant (U.S. Department of Education, 2015b). Colleges and universities took note of this guidance. College and university presidents read and paid attention to the Dear Colleague Letters. The Office of Civil Rights would better serve its population if there were continued guidance documents with more robust information, specific to the Title IX Coordinator position.

The Office of Civil Rights took the initiative to mandate a position specific to colleges and universities; therefore, the Office of Civil Rights should continue to provide additional resources and support for the Title IX Coordinator position. A lack of clarity pertaining to job requirements occurs when employees are unsure about their roles and purpose within the organization (Bolman & Deal, 2008). The Office of Civil Rights was very clear about the importance of the Title IX Coordinator position, and for that to be maintained, there should be more directives coming from this entity. A number of the

participants were enthusiastic about continued support and guidance from the Office of Civil Rights. The Office of Civil Rights should balance providing support while also eliminating the guesswork of what this office wants from the Title IX Coordinator.

One way the Office of Civil Rights can offer additional support and guidance is to provide concrete expectations versus guidance. When guidance is offered, there are variety of ways things can be accomplished. The 2015 Dear Colleague Letter added to the 2011 Dear Colleague Letter by addressing some unknown questions (U.S. Department of Education, 2015b; U.S. Department of Education, 2016). There are still some unanswered questions by the individuals who are currently serving as Title IX Coordinators on their job duties and expectations. It is unrealistic for the institutions' leadership to decipher some of those expectations. Another way the Office of Civil Rights can provide guidance and support to Title IX Coordinators is to add to their online resource website. Currently, the Office of Civil Right's resource page consists of publications and articles (U.S. Department of Education, 2015c). The Office of Civil Rights should offer some training materials and webinars related to the work of the Title IX Coordinator.

No mandates, by the Office of Civil Rights, were made surrounding the degree obtainment, skills, or qualifications of the Title IX Coordinator in either of the 2011 or 2015 Dear Colleague Letters (U.S. Department of Education 2015b; U.S. Department of Education, 2016). For the Office of Civil Rights to be clear about mandating a position without degree obtainment, skill, or qualification mandates, there seems to be a disconnect. The Office of Civil Rights would better serve its population if future mandates would include information specific to the type of degree, skills, and

qualifications that would make a successful Title IX Coordinator. For instance, Bolman and Deal (2008) pointed to the effectiveness of including rules and policies within the structure tendencies of an organization. Bolman and Deal (2008) posited “rules, policies, standards, and standard operating procedures limit individual discretion and help ensure that behavior is predictable and consistent” (p. 54). For the Office of Civil Rights to provide no guidance to colleges and universities in this area and expect the Title IX Coordinator position to be effective on a campus, there needs to be some consistency in degree obtainment, skills, and qualifications.

The Title IX Coordinator position requires some level of additional guidance pertaining to educational qualifications from the Office of Civil Rights outside of the 2011 and 2015 Dear Colleague Letters (U.S. Department of Education, 2015b; U.S. Department of Education, 2016). The 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) mandates the Title IX Coordinator position but does not offer any guidance in the areas of education, qualifications, or skills. Conversely, the 2015 Dear Colleague Letter (U.S. Department of Education, 2015e) does provide some recommendations as to the kind of training the Title IX Coordinator should receive. This research can offer advice pertaining to these areas based on the recommendations of the participants. The participants who were interviewed did not seek complete guidance from the Office of Civil Rights in respect to education, qualifications, or skills but were clear about what this position should entail. Structural dilemmas are created when little to no guidance is offered by a representative entity (Bolman & Deal, 2008). As evident by the data, there is no standard. Higher education institutions would benefit from

additional guidance specifically related to the educational qualifications (e.g., degree and skill set) of a Title IX Coordinator.

Finally, the Office of Civil Rights does not offer any online or in person training for the Title IX Coordinator, a position this office is mandating for at every institution. Instead, the training is in the hands of other entities. More specifically, the Office of Civil Rights articulates the responsibility of training for the Title IX Coordinator position (U.S. Department of Education, 2016). The Office of Civil Rights needs to provide some training if they have expectations as to what a Title IX Coordinator should be doing. On the other hand, the Office of Civil Rights could also be a voice within the current training that is being offered by not only the Association of Title IX Administrators (ATIXA) but also the National Center for Higher Education Risk Management Group (NCHERM).

Universities/Colleges

Some of the participants who were interviewed also had other job duties in addition to their Title IX Coordinator duties. Per both the 2011 and 2015 Dear Colleague Letters (U.S. Department of Education, 2015b; U.S. Department of Education, 2016), the Office of Civil Rights offers guidance centered upon one individual at the institution who shall serve as the Title IX Coordinator. Furthermore, the Office of Civil Rights did provide guidance regarding the utilization of multiple designees who carry out duties pertaining to Title IX based on institution size (U.S. Department of Education, 2016e). It is the recommendation, based on the data collected, for one centralized Title IX Coordinator at each individual college or university. The role of the Title IX Coordinator is such that is important to warrant one full-time staff member. For those institutions who currently have one individual serving as the Title IX Coordinator with multiple other

responsibilities, it would be worthwhile to follow the Office of Civil Right's guidance in this area.

The 2015 Dear Colleague Letter addressed who should supervise the Title IX Coordinator (U.S. Department of Education, 2016). The rationale for the reporting line is strong indicting a potential conflict of interest should there be another supervisor of the Title IX Coordinator. It is the recommendation of this researcher that the Title IX Coordinator position continue to be supervised by the highest ranking college or university official, which typically is the president. For this position to be consistently seen by students, faculty, staff, and parents, the reporting lines should be clear and direct to the president. By unspoken definition, the president has a level of legitimate power not only within their organization but also within the community (French & Raven, 1959/2005). This legitimate power should be utilized through the supervision reporting line as a means to express the problematic nature of sexual violence on a college or university campus. Every day, on a college or university campus, students, faculty, and staff believe the president has the right to prescribe certain behaviors and set the tone (French & Raven, 1959/2005). To send the message that the Title IX Coordinator is important and the work he or she is doing is important, it is essential for this position to continue reporting directly to the president.

Conclusion

This study on the experiences of Title IX Coordinators found that compliance with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015b) is important to Title IX Coordinators. Involvement from the Office of Civil Rights is valued by Title IX Coordinators, and supervision by the highest ranking official, such as the president,

adds credence to the work of the Title IX Coordinator. The development of a Title IX office stems from the origins of student discipline or conduct work, and there is currently no model which is considered the norm given there is no guidance from the Office of Civil Rights. Furthermore, the researcher found there is not a prescribed educational degree obtained to become a Title IX Coordinator that is preferred. The study's findings showed a variance in qualifications and skills of the Title IX Coordinator. Furthermore, the researcher highlighted the lack of training offered by the Office of Civil Rights for this type of position.

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CHAPTER FIVE
CONTRIBUTION TO SCHOLARSHIP

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Compliance University: Experiences of University and College Title IX Coordinators

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This article explores the experiences of Title IX Coordinators as examined in a qualitative phenomenological approach. The findings represent how an institution defines the Title IX Coordinator position and how this position fits into the current structure of an institution.

Keywords: Title IX Coordinator, Title IX, Dear Colleague Letter 2011

The Title IX Coordinator position is a fairly new position on a college campus. There have been Title IX Coordinators whose job responsibilities center upon regulating laws pertaining to athletics (Hoffman, 2011; June 2014). Nevertheless, the position can be seen as early as a few decades ago, specifically in regard to working with equality among student athletes (Hoffman, 2011; June, 2014; Taylor, 2005). Recently, the Title IX Coordinator position became more prominent on college campuses when a call to action was made by the government in response to the increased in amount of sexual assaults that have been reported as well as the way colleges and universities were handling the sexual assault complaints students were reporting. While the government called for the establishment of a Title IX Coordinator at every college and university, there was nothing in the form of established position guidelines, procedures, funding, or support for the Title IX Coordinator, or for colleges and universities which must employ one (U.S. Department of Education, 2015a).

Conceptual Framework

The conceptual framework for this article centers upon the structural frame introduced by Bolman and Deal (2008) while integrating concepts, theories, and principles from organizational structure literature. Bolman and Deal (2008) outlined four frames which a researcher can utilize when examining an organization. It is the backbone of an organization and the means to explaining how an organization operates. When thinking about a metaphor for the structural frame, it can be likened to a skeleton. The skeleton, or the structure, serves as a base which explains the inner workings.

One of the inner workings of an organization is the structural configuration (Bolman & Deal, 2008). Bolman and Deal's (2008) structural frame also considers how an organization is coordinated. An organization can be coordinated either vertically or laterally (Bolman & Deal, 2008). Within an organization's coordination are tenets which speak to the work of employees. Hierarchy is equally important as it explains to a community the political operations of an organization; hierarchy includes the "systems that allow organizations to hold people accountable for getting assigned work done" (Jaques, 1990/2005, p. 233).

When examining the structural frame within an organization, there is a parallel between authority and power (Bolman & Deal, 2008). Additionally, where the position is placed within the overall organizational hierarchy said position can be an indication of power as well. The supervision reporting lines could also indicate some level of power. French and Raven (1959/2005) discussed their bases of power which can be

attributed to varying factors; their bases of power can be applied as a theory as to why a person in a certain position has the power he or she does.

Literature Review

Susie went to a party one night with her good friend Tom. Susie and Tom had known each other since their freshman year and were now entering their junior year. They had always been friends but nothing more. At the party Susie and Tom both drank a lot. After the party, Tom walked Susie back to her residence hall room. Susie asked Tom to come in and started kissing Tom. Both Susie and Tom were drunk and engaged in sexual intercourse. The next morning, Tom left and thought nothing of the encounter. Susie began to feel disturbed about the encounter and questioned what took place between her and Tom. During the next week, Susie started to not pay attention in class and began to withdraw from her friends. Susie began to have a difficult time turning in her homework and did not return any calls from Tom. Susie went to see a counselor so she could speak with someone about what she was feeling.

The vignette above describes the type of information that is being reported to Title IX Coordinators from college aged students across the United States. As a result of the Dear Colleague Letter (U.S. Department of Education, 2015a), the Office of Civil Rights called for each higher education institution to employ a Title IX Coordinator who would serve as a gatekeeper for sexual harassment, sexual assault, and sexual misconduct. This literature review will examine the extant literature surrounding Title IX and the emergence of the Title IX Coordinator's role on a college campus.

Title IX

Title IX originated as a law derived from the civil rights and feminist movements stemming back as early as the 1950s. In 1954, the Supreme Court handed down its decision regarding *Brown v. Board of Education* which banned racial segregation in public schools. In 1964, the Civil Rights Act, or Title IV, was passed which barred employment discrimination based on race, color, religion, sex, or national origin (Block, 2012). The passage of the Civil Rights Act of 1964 paved the way for Title IX's

introduction. The Civil Rights Act of 1964 enforced non-discrimination within fields of employment and not education (Block, 2012; Women's Educational Equity Act [WEEA] Resource Center, 1997).

The concept of Title IX originated in 1969 when Bernice Sandler was employed at the University of Maryland. Sandler's male colleagues saw her as being too assertive, so she was denied the chance to obtain a position which would eventually lead to awarding her tenure (Ware, 2007). Sandler decided to file a complaint, and subsequently created a relationship with the Chair of the Education committee, Representative Green (Ware, 2007). Through this relationship, Sandler and Green worked to create the language which is now Title IX (Ware, 2007; Winchester, 2012). The initial bill concerning Title IX sought to amend Title VI, Title VII, and the Equal Pay Act (Ware, 2007).

The first versions of Title IX proposed to amend not only the Civil Rights Act to protect employees in educational institutions but also further amend the Civil Rights Act to include sex discrimination. After discussing the proposed amendments in the Senate, supporters felt the amendments would weaken the current Civil Rights Act so they created a stand-alone act called Title IX (Ware, 2007) which is encompassed within the Higher Education Acts of 1972 (Block, 2012; Ware, 2007; Women's Educational Equity Act [WEEA] Resource Center, 1997). In the end, Title IX was identical to that of Title VI except it was limited to education (Ware, 2007).

Title IX's preamble reads: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any educational programs or activity receiving federal financial

assistance” (Title IX, 1972). As seen by the preamble, Title IX, as an act, is vague which led President Nixon to give interpretation of the act to the Department of Health, Education, and Welfare (DHEW). The language was broad as the act spanned not only employees but also students from kindergarten to graduate school; essentially, the act protected anyone who was enrolled in an educational setting (Hanson, Guilfooy, & Pillai, 2009). In 1975, after the DHEW was able to solidify the interpretation of this act, President Ford signed the Title IX regulations that would ensure equity (Block, 2012; Ware, 2007; Women’s Educational Equity Act [WEEA] Resource Center, 1997). The heart of Title IX was not only to allow for more women to be encouraged to have access to educational benefits at an institution of higher education but also to encourage more females to major in areas such as science, health, or mathematics which were male dominated. While Title IX was to be interpreted as a way to allow equal access at educational institutions for women, it quickly turned into an act based on women and their role in athletics (Ware, 2007; Winchester, 2012).

Originally there were no regulations on how to enforce gender equality. In 1979, the Department of Health, Education, and Welfare created a three-pronged test which enable institutions to show they are in compliance with Title IX (Ware, 2007). The three-pronged test is still in effect today, but manipulations have been made throughout its existence. As Title IX evolved, the definition and interpretation evolved as well. Title IX’s practical application could be seen in the day-to-day operations of an educational institution. For instance, access to courses, equivalent facilities, financial assistance, health services, admissions, and educational programs are all examples of the application of Title IX (Hanson et. al., 2009). As lawmakers and practitioners began to fully

examine the scope of Title IX, the interpretation was challenged as well in different ways.

Two court cases were fundamental to lawmakers viewing Title IX in a different context than gender equality in sports. The 1992 case of *Franklin v. Gwinnett County Public Schools* held a school could be liable for the sexual misconduct of an employee if the institution was aware of the misconduct (Block, 2012; Ware, 2007). Equally important was the notion that monetary damages would be an acceptable remedy. In 1999, a school district in Monroe County was sued by a student's mother as she believed her daughter was sexually harassed by another student at school. The courts ruled the sexual harassment was severe enough to cause a disruption in the educational experience of this student based on sex discrimination (Chaves, 2000; *Davis v. Monroe County Board of Education, 1999*). The court was able to address the question of whether or not an institution could be held liable for their students given the school knew about the harassment. These cases were crucial to the development of mandatory reporting by school officials. *Davis v. Monroe County Board of Education* (1999) was a pivotal case as it opened the doors for a different interpretation of Title IX (Chaves, 2000; *Davis v. Monroe County Board of Education, 1999*).

Dear Colleague Letter 2011

The Office of Civil Rights (OCR) is the federal entity which upholds and enforces anti-discrimination, including Title IX (Carroll et al., 2013; U.S. Department of Education, 2015b). The Office of Civil Rights (U.S. Department of Education, 2015b) is clear that the mission "is to ensure equal access to education and to promote educational excellence throughout the nation through vigorous enforcement of civil rights" (para.

1). A 2002 Campus Sexual Assault Survey research report was submitted to the U.S. Department of Justice that documented the prevalence of sexual assault on college campuses and the disturbing amount of collegiate women who were victims of sexual assault (Karjane, Fisher, & Cullen, 2002). OCR found this report to be significant in its findings specifically in the areas of sexual assault victims not reporting an assault to the institution and the widespread nature of this crime on college campuses. OCR felt the nature of this crime was diminishing the educational capacity of college students when they had been sexually assaulted (Karjane et al., 2002). OCR also felt sexual violence inhibits a student's ability to maintain a quality educational experience due to the trauma of the crime (Block, 2011; Carroll et al., 2013; Karjane et al., 2002; U.S. Department of Education, 2015c).

As a result of the 2002 Campus Sexual Assault Survey, there was a lack of structure and differing policies among colleges and universities that became apparent to OCR. What was also apparent to OCR was the variance in how each college or university adjudicated sexual misconduct violations as well as the varying degrees of consequences for the perpetrator (Block, 2012; Carroll et al., 2013; Karjane et al., 2002; U.S. Department of Education, 2015b). In 2011, OCR released a Dear Colleague Letter (U.S. Department of Education, 2015a) which addressed the inconsistencies at each institution and called for a model which they developed as a sound practice in handling sexual misconduct violations on campuses nationwide. Specifically, this call to action by OCR centered upon the institution's responsibilities to govern Title IX and its protection of the student experience in an educational setting. Among the numerous mandates the Dear Colleague Letter (U.S. Department of Education, 2015a) dictated was the

determination that every higher education institution must designate a Title IX Coordinator who would serve as an institutional expert in the field of gender discrimination and would lead the institution's efforts in prevention (Block, 2012; Carroll et al., 2013; Koss, Wilgus, and Williamsen, 2014).

Sexual Assault Reporting on a College Campus

Prior to the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a), guidelines for reporting sexual assault or sexual violence was nonexistent. Higher education institutions chose the reporting method and protocol by their own volition. According to a report sponsored by the Association of American Universities (AAU) on sexual assault and sexual misconduct, reporting on a college campus was the lowest in regards to sexual touching (Cantor et al., 2015). Participants shared their discontent with reporting processes as to why a report was not made; "the dominant reason was it was not considered serious enough" (Cantor et al., 2015, p. xxi). While this report was administered in the spring semester of 2015, after the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) was released, the results showed there was a need for increased reporting.

The U.S. Department of Education's position on sexual violence taking place at an educational institution is the responsibility of the institution (U.S. Department of Education, 2015a). With that being said, prior to both the 2011 and 2015 Dear Colleague Letters (U.S. Department of Education, 2015a; U. S. Department of Education, 2016a), there was variance in guidelines specific to sexual violence reporting within higher education institutions. Essentially, the U.S. Department of Education noted how inconsistent or nonexistent sexual assault reporting was on college and university

campuses. Inside the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a), the Assistant Secretary of the U.S. Department of Education declared three procedural requirements to sexual assault and/or sexual violence. Two of the three requirements pertained to sexual assault and/or sexual violence reporting on a college campus (U.S. Department of Education, 2015a). First, colleges and universities need to publish a notice of nondiscrimination. The notice of nondiscrimination needs to be specific and not general so as to not mislead students. The published information needs to also be widely advertised among students, faculty, and staff.

Second, colleges and universities need to “adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee sex discrimination complaints” (U.S. Department of Education, 2015a, p. 6). Grievance policies need not be different than current student conduct processes; however, the policies need to be prompt and equitable.

Consistent with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a), the White House published a 2014 report called “*Not Alone*” (White House Task Force to Protect Students from Sexual Assault, 2014). The report reinforced the message sent from the U.S. Department of Education in 2011 by outlining how colleges and universities should be responding to sexual assaults on campus. Students should have the ability to speak with someone confidentially until they are ready to report to university officials who are considered mandatory reporters. Medical professionals, licensed counselors, clergy, and victim advocates are individuals who maintain confidentiality (White House Task Force to Protect Students from Sexual Assault, 2014). Schools need to create a comprehensive sexual misconduct policy and offer trauma-informed training

for university officials. Finally, colleges and universities need to offer disciplinary systems that are survivor focused and less victim blamed (White House Task Force to Protect Students from Sexual Assault, 2014).

Title IX Coordinators

In 1972 when Title IX was passed, the law was written in a vague manner to the point where the President of the United States was unclear on the definition of said law. President Nixon decided to move the interpretation of Title IX into the Department of Health, Education, and Welfare (DHEW); (Hanson, Guilfooy, & Pillai, 2009). Title IX hastily became a law centered upon female gender equality within athletics (Ware, 2007; Winchester, 2012).

Prior to the Dear Colleague Letter (U.S. Department of Education, 2015a), Title IX “require[d] that at least one employee be designated to coordinate compliance efforts” (Waterson, 1987, p. 4). Furthermore, Title IX Coordinators were employed to “eliminate broader sex bias and stereotyping which have harmful effects on students, employees, and the educational process itself” (Waterson, 1987, p. 4). This definition of the role of a Title IX Coordinator as stated in a manual for New York state schools is broad yet, at the same time, the coordinator’s work primarily centered upon discrimination in athletics. Title IX Coordinators’ work should encompass assurance that there is no discrimination when it comes to all facets of K-12 education or higher education. For instance, Title IX encompasses facilities, course access, student health services, financial aid, student activities, and housing to which a Title IX Coordinator would oversee a complaint process if a violation occurs (Baulch, 2004).

In 1975, lawmakers, in 1975, established Title IX regulations which mandated the first existence of a designated responsible employee who will “...coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions...” (U.S. Department of Education, 2016b, sec. 106.8). While the 1975 regulations mandated a designated responsible employee in K-12 school districts and higher education institutions, both entities continued to struggle with creating a Title IX Coordinator position. The struggle to hire, train, and retain a Title IX Coordinator stemmed from a lack of knowledge on the part of K-12 and higher education, regardless of the amount of communication that came from the Office of Civil Rights (Baulch, 2004; Franke, 1997).

The Dear Colleague Letter of 2011 (U.S. Department of Education, 2015a) produced by the Office of Civil Rights not only reinterpreted Title IX in terms of sexual violence but also reinterpreted the role of a Title IX Coordinator. Once again, the Office of Civil Rights mandated a designated responsible employee be established to “...coordinate its efforts to comply with and carry out its responsibilities under Title IX...” (U.S. Department of Education, 2015a, p. 6). This time the communication was loud and clear from the Office of Civil Rights, and higher education institutions took notice. According to the Chronicle of Higher Education (June, 2014), “On a growing number of campuses, what used to be a part-time job or an add-on for a faculty member or staff member is now full time” (para. 3). Institutions of higher education were rushing to create Title IX Coordinator positions at colleges and universities. The Office of Civil Rights released a 2015 Dear Colleague Letter (U.S. Department of Education, 2016b)

which reiterated the Assistant Secretary's expectation that colleges and universities designate a Title IX Coordinators whose sole responsibilities lie with compliance of Title IX regulations due to the federal funding an institution was receiving.

Methodology

This research was a qualitative study with a phenomenological approach. The phenomenological approach was chosen as it enables the researcher to understand human experiences (Creswell, 2009). Since this study examined a job position which deals with human experiences, utilizing a phenomenological approach will also help to understand how this experience translates into a shared experience (Merriam, 2009). The research questions guiding this study were:

1. How is the Title IX Coordinator position defined at various institutions? (Role Definition)
2. Given its government mandates, how does the Title IX Coordinator position fit into the existing structure of a college or university? (Organizational Positioning)

Participants and Data Collection Tools

This study explored the experiences of Title IX Coordinators across the Midwest on a college or university campus. Twelve Title IX Coordinators were interviewed utilizing semi-structured interview protocol (Merriam, 2009). The questions were open ended to solicit a pattern or theme once the information had been coded (Merriam, 2009). The interviews provided a broad set of experiences as the twelve Title IX Coordinators represent public and private; community colleges, and religiously affiliated institutions in the Midwest. The interviews were held for 45 to 60 minutes either via phone or in person. All interviews were recorded, with permission, transcribed, and no

identifiable information can be found within the data. Participants were asked questions based on their supervisory lines, job duties, and job philosophy. Two Title IX Coordinators who participated in the study agreed to be observed for no more than four hours. The observations included facilitated presentations by the Title IX Coordinator, staff meetings, and one on one student interactions with the Title IX Coordinator. Observations were conducted utilizing an observation guide which aided in triangulation. The researcher obtained, from the interviewed Title IX Coordinators, artifacts which are pertinent to the job outcome. Artifacts included, but are not limited to (a) copies of daily calendars and logs, (b) incident reports, (c) investigative reports, and (d) organizational charts over the span of one year. These artifacts enabled the researcher to garner a picture of the responsibilities and experiences the Title IX Coordinator position entails. Finally, the researcher acquired various job descriptions from across the United States to compare and contrast job requirements and job duties. Job descriptions were important to this study as they provided data to answer the research questions. Given that the government has not provided direction in this area, it is critical to see how each institution differentiates their job descriptions. The job descriptions were the most current and no older than the past three years.

Data Analysis

Interviews were transcribed verbatim and coded as were the gathered artifacts. The initial qualitative data coding was completed by seeing which patterns and themes emerge as a result of a first read (Merriam, 2009). The horizontalization process was used by the researcher as “laying out all the data for examination and treating the data as having equal weight” (Merriam, 2009, p. 26). Emergent themes and patterns were

underlined and identified in the margins of the transcribed interviews. The themes were moved into “clusters of meaning” (Creswell, 2013, p. 82). Finally, once patterns or themes were identified through open coding, the researcher focused on those patterns or themes (Emerson, Fretz, & Shaw, 2011). The identified patterns or themes were utilized to generate what the participants experienced (Creswell, 2013).

Findings

An overview of the data findings from the phenomenological study conducted on the experiences of Title IX Coordinators are presented. The findings are presented after each vignette, where each vignette signifies a different research question in order (role definition and organizational positioning). Themes which presented themselves during the course of data collection are outlined.

Role Definition

Jane started her new position as the Title IX Coordinator at State University. This was the first time that State University had hired a full-time Title IX Coordinator. Previously, State University had assigned the Title IX duties under another position. State University quickly realized they needed to employ one full-time Title IX Coordinator after receiving a letter from the Office of Civil Rights where a student filed a formal complaint. As Jane was unsure of what her job duties actually entailed, she consulted the 2011 Dear Colleague Letter and the Office of Civil Rights’ website for guidance.

Compliance Focused. Laws and policies have measures within their structures for a variety of reasons. At times, those measures may be followed or not followed by the people and/or organizations they have been placed upon. Compliance, for the purpose of these findings, is defined as to Title IX Coordinators comply with guidance from the U.S. Department of Education and/or the Office of Civil Rights. At times, compliance with such measures can come at a cost or penalty by the issuing authority.

In 2011, the Dear Colleague Letter (U.S. Department of Education, 2015a) was issued by the Office of Civil Rights as a way to assist every college and university in complying with Title IX. Every participant interviewed spoke at some level about the Dear Colleague Letter (U.S. Department of Education, 2015a). The impact of this guidance can be seen not only within the participant interviews but also in the qualifications listed on the job descriptions gathered. The Dear Colleague Letter (U.S. Department of Education, 2015a) is the leading informative material when it comes to this type of guidance and is referred to as a Title IX guiding document. Twenty of the 30 job descriptions acquired called for a knowledge of Title IX policies and practices, including guiding documents.

The depth of compliance varies depending on the institution. Some colleges and universities see it as guidance, and some see it as mandatory for fear of financial penalties. When the first Dear Colleague Letter (U.S. Department of Education, 2015a) was issued, most universities and colleges rushed to create internal infrastructures which would comply with the guidance put forth. Title IX Coordinator G illuminates this by stating:

Our college president got the directive that we needed a contact for discrimination or harassment. He took discrimination to be related to disability [and], put my name on the paperwork years and years ago. Then as the Dear Colleague Letter was released in 2011 that became even more important. (lines 8-10)

One Title IX Coordinator interviewed wanted the Office of Civil Rights to know how they are complying with the guidance. For instance:

It's just like we're doing the best that we can and we think that we're complying

with all of their guidance. We look at their letters. We appreciate their help and we're really trying to make our campus an inclusive community. (Title IX Coordinator J, lines 238-240)

Another Title IX Coordinator indicated there was a level of care for the implementation process. Guidance from the Dear Colleague Letter (U.S. Department of Education, 2015a) was not necessarily being employed because of a need but because there was a care for students, faculty, and staff. Title IX Coordinator B expressed:

What I would want them to know is that we really do care. We really take sexual misconduct seriously, most folks...who do what I do really care, and they really want to help. (Title IX Coordinator B, lines 209-211)

Similar to Title IX Coordinator G, other participants expressed the rush to comply with Title IX practices at their institution by way of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a). Title IX Coordinator H posited:

A lot of institutions were unaware or didn't have the ability to fund or hadn't focused on it, so I think that after the Dear Colleague Letter and the guidance a number of institutions decided that it was important to have someone more focused on this work. That's part of why the office was created. (Title IX Coordinator H, lines 27-30)

Office of Civil Rights Ambiguity. After the Office of Civil Rights produced the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a), there have been mixed thoughts and reactions to how much guidance was offered. The Office of Civil Rights seeks to serve students who experience discrimination but to what end? Of the participants spoken to for this study, there were questions as to how much or how little

guidance is or should be coming from the Office of Civil Rights. Either way, the Office of Civil Rights does play a role in Title IX and the guidance surrounding this law, which is the definition utilized within this finding. Furthermore, the Office of Civil Rights does define the Title IX Coordinator position on a college or university campus, given the materials they have published surrounding Title IX. Title IX Coordinator A postulated this notion during the interview by articulating “You as the Title IX Coordinator, you technically report to us, as Office of Civil Rights, but we understand that you are also working for this campus and so it is this sort of huge regulated mess right now” (lines 125-127).

The Title IX Coordinators interviewed understood this guidance in a number of differing ways. For some of the participants, they described how they tried to work with the Office of Civil Rights on compliance. Title IX Coordinator F spoke twice about the guidance from the Office of Civil Rights. First, “Some of their guidance is too grey and really hard for people to navigate without more specific direction” (lines 190-191). She followed up later in the interview by observing:

Most people are trying to comply with the Department of Justice and the Office of Civil Rights, but it’s actually not possible to do that 100% of the time because you have to apply guess work. So how do we know if we got it right or not? (lines 202-205)

Title IX Coordinator H expressed a need for additional help and also worry for other institutions when describing the Office of Civil Right’s involvement. This participant worried, along with others, that institutions were not thinking through the spirit of Title

IX but doing what was needed to be in compliance. According to Title IX Coordinator H:

I would love for that person at OCR to help strategize and build tools, technical assistance maybe, in conveying that message and getting the word out. Right now, I'm concerned that too many institutions are just going through the motions or checking a box. (lines 219-221)

As the Title IX Coordinators interviewed expressed concern over checking boxes to be in compliance, there were participants who noted the ambiguity of the guidance the Office of Civil Rights is providing. The participants felt a need to comply with the guidance and have solid guidelines in place; however, some felt concern over the lack of direction. Title IX Coordinator A communicated "When I say clarity, I mean give me some more things that...we can actually do and that actually make sense" (lines 324-325). Another Title IX Coordinator provided a comparable thought "... I wish the OCR would provide more guidance around for examples. I don't need more guidance" (Title IX Coordinator K, lines 321-322). Likewise, a Title IX Coordinator spoke to the Office of Civil Right's involvement regarding additional guidance, given the lack of clarity encased within the Dear Colleague Letter (U.S. Department of Education, 2015a). Title IX Coordinator L stated:

If they want to be in the business of recommending and mandating things for campuses to do, then they should also mandate some staffing expectations because that is my biggest challenge, that I am expected to be the coordinator of our response effort. I'm also expected to be the primary investigator. I'm also expected to be the primary person who comes up [with] and implements all of our

education efforts. It's barely manageable. (Title IX Coordinator L, lines 227-231)

Realistic or unrealistic expectations set forth by the Office of Civil Rights was another defining piece of the Title IX position. Given the ambiguity of the position and the expectations from the Office of Civil Rights, it was challenging for Title IX Coordinators to grasp how the position should be defined at a college or university. While most Title IX Coordinators wanted more clarity about the expectations, a number of the Title IX Coordinators also felt as if the expectations were unreal; for example, "I think the first thing I would want them [Office of Civil Rights to know] is how unrealistic they can be" (Title IX Coordinator G, lines 167-168). Title IX Coordinator D was able to convey one reason being "...the language used by OCR and Title IX- there are conflicting terminologies and ambiguity, and it is hard for those of us who live with and work on a daily basis to make sense of it all" (lines 256-257).

In summary, the Title IX Coordinator position, at a given institution, has been defined by the guidance of the Office of Civil Rights. Two white papers published by the Office of Civil Rights, both the 2011 and 2015 Dear Colleague Letters (U.S. Department of Education, 2015a; U. S. Department of Education, 2016a) which provide minimal guidance surrounding how a Title IX Coordinator is defined. While there has been minimal guidance provided by the Office of Civil Rights on this position, colleges and universities continue desire compliance with the Office of Civil Rights guidance.

Organizational Positioning

Public University created their Title IX Coordinator position in 2011 when they received the Dear Colleague Letter from the Office of Civil Rights. The guidance from the Dear Colleague Letter stated the Title IX Coordinator position should be full-time and supervised by the president of the institution. At the time when the position was

created, the Title IX Coordinator reported to the president and was housed in the Office of Student Conduct. Over the course of time, the position has evolved where the Title IX Coordinator has a direct reporting line to the president but receives one on one supervision from another upper- level administrator. It has become an office which is separate from the Office of Student Conduct due to the level of complaints which were received.

The Title IX Coordinator position was mandated from the Office of Civil Rights. When a position is newly created at an institution, who supervises that person? Is the position part of a new office or an existing one? How does a mandated position, from an entity outside of the institution, fit into the already existing structures which are in place? The findings below seek to answer those questions.

Supervision Reporting Lines. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) called for all colleges and universities to employ a Title IX Coordinator; however, in 2015 the Office of Civil Rights published an additional Dear Colleague Letter (U.S. Department of Education, 2016a) which urged that the Title IX Coordinator should be supervised by senior leadership, such as the university president. Supervision was not defined within the published letter, but for the purpose of this research, supervision includes guidance, leadership, mentorship, and support of the employee. It also includes a direct reporting line from the supervisor to the supervisee, as seen in the institutional organizational chart. Supervision is defined as the person is directly supervising the Title IX Coordinator through a reporting line on the organizational chart.

A bold statement was made by the Office of Civil Rights when it was suggested supervision of the Title IX Coordinator come from the college or university president. Title IX Coordinator F speculated the reason being that complaints “can involve anybody at the university and the point of direct report to the university president is to remove

anything that might be seen as a barrier to fair and accurate investigations” (lines 88-90).

Seven of the 12 Title IX Coordinators interviewed directly reported to the president.

Title IX Coordinator L commented on the importance of supervision from the president:

I feel like being a direct report to the president of the university does help me to maintain the level of independence that’s important for my function on campus, but it is challenging because I don’t have a lot of direct supervision in the strictest sense. I have to identify what needs to be done and just get it done. (lines 139-142)

Title IX Coordinator I was able to affirm the importance of supervision by the president when stating:

I’m really fortunate because our president believes in what we’re doing. He’s compliance minded. When we told them that we needed to add certain things to our equal opportunity policy, like gender expression, he gets it. One of the first things he did when he came here was add sexual orientation on there and gender identity, so he is aware of these types of issues and is understanding of these types of things, so I think we get a great deal of support...But as far as being educated and being aware that our area is an important area, we at least have that support. I’ve heard some nightmare stories from other areas. It’s like oh no, I’m so sorry you have to deal with that. We’re really blessed. (lines 206-211;214-216)

In addition to the importance of support from this position, being supervised by the president brings a sense of importance from the university community when it is a direct report. Title IX Coordinator B voiced:

To place it anywhere else would have been too narrow of a view at the

institution. [Due to] the culture of our institution, it won't take be taken seriously if it is not elevated to the right level in our organizational chart. (lines 62-65)

Similar to Title IX Coordinator B's belief, Title IX Coordinator D, who is a Deputy Title IX Coordinator, spoke to the structural reporting line appearances:

I think that in order for us to have the institution see the importance of the work having her report to the president does give some credence to that. I think it also gives her some clout as far as decision making is concerned, and it also frees her up from conflicts of interest for the most part. (lines 116-119)

For the seven Title IX Coordinators who report to the president, there is also some co-supervision by other senior leadership on campus. The majority of the co-supervision comes from the general or legal counsel at the institution. Sometimes there is a convenience associated with working with legal counsel as well. When asked about the reporting lines, Title IX Coordinator F admitted:

I mean the reality is that I have more oversight from the legal office than I do from [the president]...There has actually been a real benefit to being in the legal office there are so many legal issues involved in Title IX, and she is a wealth of information about it (lines 118-119; 124-127).

At times, the Title IX Coordinators are supervised by senior leadership outside of the president and general or legal counsel. Five of the 12 Title IX Coordinators interviewed are supervised by a variety of other college and university officials. Of the 30 job descriptions collected, 14 specified a reporting line for the Title IX Coordinator position to someone other than the president (artifacts 1-14). Additionally, 11 organizational charts were collected which included five Title IX Coordinators who

reported to senior leaders who were not the president (artifacts 31-36). While this is different than the guidance from the Dear Colleague Letter (U.S. Department of Education, 2015b), the supervision lines work well for the institutions. Likewise, the Title IX Coordinators who are supervised by someone other than the president, do have access to the president and the available support is present. In response to questions pertaining to supervision lines, Title IX Coordinator H noted how this position does not regularly report to the president but to the executive vice chancellor/ provost. This Title IX Coordinator offered:

That's unique to each institution because the Title IX administrator needs to have some level of autonomy especially if they're in a climate where some of the work that needs to get done may be politically unpopular or if their office has any investigative role. (Title IX Coordinator H, lines 135-138)

Structural Considerations. The coordination of Title IX efforts did not traditionally begin with a Title IX office already intact. Dating back to the origins of Title IX, most schools had created Title IX positions, which were housed in athletics, due to believing this was a compliance issue (Waterson, 1987). Then again, there were also schools which would handle these complaints through the student discipline process under harassment (King, 2012). Structure, by definition, is the underpinnings or foundation of an organization. In exploring how the Title IX Coordinator position fits into the existing structure on a college campus given the government mandates, the Title IX Coordinators who were interviewed provided noteworthy examples on the creation of their offices within the existing organizational structure.

The Title IX Coordinators who were interviewed spoke to the origins and history of their office. Three of the Title IX Coordinators interviewed were instrumental in the creation of their offices as well. Title IX Coordinator K shared the following information:

The position kind of existed on paper but wasn't truly being lived out. I just, really because of my involvement with ASCA [Association of Student Conduct Administrators], I had a lot of knowledge and content expertise around Title IX as well as from my prior positions. I actually did a lot of the Title IX coordination before it was formally a part of my duties. Then our dean of students left for another position...and then [Title IX] officially became part of my job as people realized, wow, you're actually good at this and doing this. It just happened kind of organically over a couple of years. (lines 20-25)

Title IX Coordinator I had a comparable situation to Title IX Coordinator K when this position was created. This participant had been working at the institution in a different office but was the catalyst for movement in the creation of a Title IX area. This Title IX Coordinator explained:

I was actually holding the director of student conduct position at the time, and I had helped with getting that mission together and helping to communicate we definitely need to do this. Then when the position came around I [thought] know what... I would be really good for that, so I put in for it and was selected for it. (lines 15-18)

Title IX Coordinator A had been working at the institution when asked to move into the position and noted:

Originally, I was hired to be doing student conduct. So I have been here for about a year and a half doing student conduct and being a Title IX investigator.

And the institution made a decision they wanted to move forward with a full time Title IX Coordinator, and so they asked if I would be willing to step into that position. (lines 4-7)

To summarize, the supervision of the Title IX Coordinator, as articulated by the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) was the institution President would be the direct supervisor of the Title IX Coordinator. The message behind this direct reporting line was clear and profound – it was important. While Title IX Coordinators are being supervised by the president at some institutions, they are being supervised, supported, and mentored by other top university administrators as well. The supervision reporting lines are based on the abilities of the institution. The intersection with legal counsel and the Title IX position are evident as well.

Discussion

This phenomenological study of Title IX Coordinators showcases the experiences of this position when it has been mandated by the Office of Civil Rights and created within a structure that has already been established. The research found evidence of themes that were centered upon compliance focus, Office of Civil Rights ambiguity, supervision reporting lines, and structural considerations.

Compliance Focused

In 2011, the Office of Civil Rights issued a Dear Colleague Letter to every institution of higher education (U.S. Department of Education, 2015a). While most colleges and universities were unsure on what grounds the Office of Civil Rights could

provide guidance to them, the Title IX Coordinators interviewed shared how this document shaped the Title IX Coordinator position today. Whether or not there is compliance with the directives of the 2011 Dear Colleague Letter currently is not an issue as, at some level, there is compliance with this document (U.S. Department of Education, 2015a). Not only was the impact of the 2011 Dear Colleague Letter shared through the interviews, but it can also be seen within the job descriptions obtained (U.S. Department of Education, 2015a).

Twenty collected job descriptions articulated a knowledge of Title IX policies and practices as qualifications of a Title IX Coordinator. Those policies and practices can be seen in the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a). In comparison to the collected job descriptions, every Title IX Coordinator interviewed spoke on some level about the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a). This document, while unsure to college and university administrators on how it is able to hand out mandates from an outside governmental entity, is an essential piece to the composition of what makes a Title IX Coordinator. This document is the backbone of the Title IX Coordinator position as it provides the overall structure of what the overarching duties should entail, what the position should focus its efforts upon, and how the position should be operating. If a Title IX Coordinator is new to their position or unsure of their duties, compliance with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) is crucial.

Office of Civil Rights Ambiguity

The 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) was published by the Office of Civil Rights which, in turn, is the government entity

advocating, creating, and interpreting Title IX. The Title IX Coordinators interviewed expressed a number of thoughts about the involvement of the Office of Civil Rights. Their thoughts ranged from feelings of low level involvement where there was a need for more guidance to unrealistic expectations set by the Office of Civil Rights. Whatever the level of involvement the Title IX Coordinators were clear about needing more guidance and answers to questions from the Office of Civil Rights.

Supervision Reporting Lines

One universal statement made by the Office of Civil Rights pertains to supervision of the Title IX Coordinator. The Office of Civil Rights was clear in the 2015 Dear Colleague Letter (U.S. Department of Education, 2016a) that the Title IX Coordinator was to be supervised by the institution president. The Office of Civil Rights did not define what supervision would look like; however, the Office of Civil Rights was bold in the philosophy behind this declaration. The Title IX Coordinator, as a stand-alone position reporting to the top administrator on a campus sent a strong message not only to those individuals who applied for the position but also to members of the campus community. This importance was documented in job descriptions and organizational charts. After a review of current job descriptions and organizational charts collected, 23 Title IX Coordinators were supervised by the college or university president.

The Office of Civil Right's message was clear that the supervision of the Title IX Coordinator by the president was important. The importance laid within the support offered by the president, the independence of the position offered by the president, and the seriousness in the eyes of the community. A direct reporting line to the president also wields a high level of legitimate power (French & Raven, 1959/2005). For instance,

when the president dictates who will report directly to him or her, the individuals under the president takes note of the legitimacy associated with that stance. This was essential to the participants because the issue of Title IX was so important.

In addition to the Title IX Coordinators reporting to the president, there were Title IX Coordinators who were co-supervised or directly supervised by other senior leaders. In the 2015 Dear Colleague Letter (U.S. Department of Education, 2016a), the Office of Civil Rights speaks to the expectation that the Title IX Coordinator receive support from their institution. The relationship with general or legal counsel was realistic, and at times, out of convenience. In terms of the other reporting lines, the supervision happened because of how well it worked for those institutions. Once again, supervision reporting lines were not a “one size fits all” as mandated by the Office of Civil Rights (U.S. Department of Education, 2016a). For the five Title IX Coordinators interviewed who were not directly supervised by the president, there was still support and access of the president.

Structural Considerations

With the issuance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) the concept of a Title IX Coordinator was vague by the Office of Civil Rights on the definition of this position. The 2011 Dear Colleague Letter stated that each college and university was to “designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title IX” (U.S. Department of Education, 2015a). Simply stated, the Office of Civil Rights only mandated a staffing structure of one.

In the early stages of this mandate, there were no examples in which office the Title IX Coordinator would be organized under or whether there was staffing considerations underneath the Title IX Coordinator. What was evident was the pressure associated with creating a position when there might currently be a position at the institution. There was a rush for institutions to create a position so there could be compliance. The origins of the Title IX Coordinators who participated in this research can also be seen derived from student conduct or discipline practices and offices. There are comparable attributes of the Title IX process to the student discipline process which may explain the origination. The 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) spoke to these origins by illuminating the relationship between the two processes.

Limitations

The most significant limitation associated with this research was the recruitment of the participants. The issuance of the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) stirred some anxiety and pressure among colleagues at higher education institutions. With this anxiety and pressure, also came the stigma of compliance. Creswell (2013) reflected about conducting qualitative research in regards to access by stating “Convincing individuals to participate in the study, building trust and credibility at the field site, and getting people from a site to respond are all important access challenges” (p. 171). Due to this perceived stigma, there were a number of participants who were recruited but never responded back. Furthermore, there were participants who initially responded positively to the recruitment request and later

decided to opt out of the study. Ultimately, the individuals who participated did not share any hesitations surrounding the questions asked and participated fully in this study.

Another limitation which presented itself was the timeline associated with the research study. To begin, the recruitment emails to participants was to be distributed earlier than it actually occurred. In addition to obtaining Institutional Review Board (IRB) permission from the home institution, there was confusion centering upon the permissions needed from the other sites as well. While Creswell (2013) pointed out “most qualitative studies are exempt from a lengthy review ...” (p. 152), this study was not. Due to the challenges associated with the IRB process, the research timeline was altered. The academic schedule at an institution of higher education has ebbs and flows of busy time. As a result of the altered timeline, the participants were recruited at a time which was significantly busy for their schedules. There were a number of participants who were contacted but did not respond which the researcher believes has to do with the timeline. As a means to ensure data was collected on this topic, a larger net was cast and Deputy Title IX Coordinators were recruited as well.

In the day and age of the internet, it was not unreasonable for the researcher to obtain artifacts from an institutions’ website to support the findings. Merriam (2009) elaborates on this sentiment by offering “the growing importance of online interaction makes it a natural arena for qualitative research” (p. 162). Another limitation presented in this study was the ability to obtain not only job descriptions and organizational charts but also current job descriptions and organizational charts. A number of colleges and universities did not publish online their job descriptions nor any organizational charts. This limitation was more challenging when attempting to obtain job descriptions.

Conversely, what was helpful in this matter, was the amount of job announcements published for the Title IX Coordinator position through a variety of higher education recruiting websites.

Finally, documents on websites are public knowledge for all who have access to the internet however, documents that are created and maintained within an institution physically are considered private. In the beginning, the researcher planned to obtain artifacts specific to the Title IX Coordinator position which would aid in triangulation of the data. A limitation associated with this objective was the private nature of these documents. There were a number of participants who expressed anxiety and unrest over the document request. These anxieties and feelings were highly considered and the request for privacy was obliged. While the documents were not imperative to the results of the findings, it would have added to the richness of the data.

Conclusion

The study on the experiences of Title IX Coordinators found that compliance with the 2011 Dear Colleague Letter (U.S. Department of Education, 2015a) is important to Title IX Coordinators. Involvement from the Office of Civil Rights is valued by Title IX Coordinators and supervision by the highest ranking official, such as the president, adds credence to the work of the Title IX Coordinator. The development of a Title IX office area stems from origins of student discipline or conduct work, and there is currently no model which is considered the norm given there is no guidance from the Office of Civil Rights.

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CHAPTER SIX
SCHOLARLY PRACTITIONER REFLECTION

Dissertation in Practice Reflection

When I graduated with my master's degree in College Student Personnel in 2005, I did not imagine I would ever return to a university to obtain my doctoral degree. As I fast forward to 2016 and am reflecting on my experiences writing this dissertation, I am proud to be able to say I have come this far. The process of writing, researching, and talking through the dissertation has been beneficial, and one where I can say I have grown as an educational leader and scholar. This piece of the dissertation will be a reflection on my journey through the dissertation as an educational leader and scholar.

How Has the Dissertation Process Influenced You as a Scholar?

Organizational Structures

As a scholar, it would not appear to make sense that one would be thinking about organizational structures when writing a dissertation. Nevertheless, for me, it was quite the opposite. One of the challenges I encountered during my time writing this dissertation was working within the already established parameters of the Institutional Review Board (IRB) not only with the University of Missouri but also those of the other schools from where I was seeking data. One of my favorite pieces I read during Summer one which I refer to often is that of Karl Weick (1976) and his work with loosely coupled systems. Weick (1976) posed a question within his article, "Educational Organizations as Loosely Coupled Systems," which seems fitting for the experiences I had with the IRB process. Weick (1976) asked "How does an organization go about doing what it does and with what consequences for its people, processes, products, and persistence?" (p. 1). As I went round and round with completing the IRB applications and finding out the

applications were not necessary, I began to question what the worth of the process was and whether or not I had the persistence to continue.

What I did find through the IRB process was the ability to learn how to ask more questions, document my conversations, and find patience as the process would resolve itself at some point – there was a way to get through it. I also found the ability to appropriately question those individuals from who I needed the IRB approval from with a manner of scholarly respect. I admit I did have to network at times to see where my application was in the queue, however, all was done for academic benefit.

Another piece of the IRB process which proved to be challenging were the unwritten rules and procedures that accompany research in a modern world. Given that anyone could potentially find who I was interviewing via the Internet, the traditional structures for managing my data which had been taught in our classes were impractical and unethical in the eyes of the IRB office. For instance, creating a mechanism to store data even with randomly assigned identifiers was not plausible for the IRB office (Merriam, 2009). As a scholar, I learned there are practices which are taught in the educational confines of the classroom, and then there are educational practices which are actually utilized in the workplace.

Data Collection

The topic of my dissertation centered upon the experiences of Title IX Coordinators. This position was mandated by the Office of Civil Rights in 2011 which makes it fairly new to most institutions (U.S. Department of Education, 2015b). As I was collecting data, one of the challenges that presented itself was participants' unwillingness to participate in my research. As I reflect on this experience there were a few reasons

why there might be hesitation. First, the timing of when I sent my recruitment emails was during a busy time of year for this position. After my proposal defense, I had drafted a schedule which I thought would work for participant recruitment. When the IRB process became longer than expected, my schedule had to be modified.

Second, the position is new, and I believe the individuals were nervous about disclosing the type of information I was asking for, regardless of the anonymous nature of the study. While my recruitment introduction email did disclose the topics covered in my research, which would not broach on any sensitive subjects, the research was still new to this area. Conversely, the recruitment email did not state the data collected would be anonymous. My initial recruitment efforts yielded a number of individuals who did not return my emails or phone calls. What was difficult with these efforts was having to return to the IRB process to fill out additional amendment forms.

In the beginning of the data collection process, I utilized convenience sampling however, as time passed, I also incorporated snowball or network sampling (Merriam, 2009). Utilizing network sampling was a great way for current participants to help me identify potential participants who might be open in talking about my research. As I think about conducting research in the future, I will be more conscious of how to craft my recruitment email.

Scholarly Culture

Throughout my time in this program, I have come to appreciate the value of culture not only within my own institution but the culture that happens to exist at other institutions and within divisions as well. As I currently work in the student affairs division, immersing myself into the academic side of a variety of institutions has been

beneficial to say the least. Through, the course of completing this dissertation in practice, I have had the pleasure of observing and learning about scholarly culture as well. A quote which has carried me through this program can be credited to Schein (1993/2005) as he stated, “Culture will be most useful as a concept if it helps us better understand the hidden and complex aspects of organizational life” (p. 360). I was not aware of the hidden aspects of the scholarly culture until I started my dissertation. I knew prior to the dissertation that the academic side of colleges and universities was different, but I learned what that really meant through this process. Furthermore, the academic side of a college or university is very complex. I was not aware of the layers within the academic side prior to the dissertation but quickly learned about those complexities as I applied for IRB not only at my home institution but at others as well. Once again, the work of Weick (1976) comes to mind as I think about the layers as system loops. The dissertation in practice helped me understand that there is a scholarly culture, and I feel as if I have a better understanding of how to maneuver through it for the next time.

How Has the Dissertation Process Influenced You as an Educational Leader?

Frames

Bolman and Deal (2008) have been a staple throughout my dissertation as well as in my coursework. Bolman and Deal (2008) was introduced during Summer 1, and I was not aware of the impact it would have on me today. This book is something that I have used at work but also as I navigated the dissertation process. The political frame is not one where I typically like to spend time, however, through the dissertation process, I have found myself more adept at utilizing that frame (Bolman & Deal, 2008). It has been compelling to see how the dissertation committee itself operates under the political

frame. After listening to some of my fellow classmates speak about the composition of their committee and the dynamics of said committee, I am happy to report my committee does not fall under what could be perceived as a political nightmare. With that being said, it has been fascinating to learn about the inner workings of dissertation committees.

A huge component of my reflection of the dissertation in practice continues to center upon the IRB process. As I was applying for a number of different IRB applications, the political frame was in the forefront of what was taking place (Bolman & Deal, 2008). During the application process, certain institutions where I was applying for IRB approval did not care about the fact that the main IRB application (which included their rules and procedures) was coming from the University of Missouri, the state flagship institution which was contrary to what the University of Missouri believed should be happening. I had to respect the IRB process of each institution and not overstep boundaries which might lead to a negative political balance. I also had to be mindful of the political culture which surrounded the work I was doing. The Office of Civil Rights is a government entity that currently carries a lot of political clout. I had to realize the political implications that my study carried for the participants. As additional studies are conducted in this area, I am sure the political effects will decrease.

Leadership Style/Traits

My leadership style has certainly grown from the time I attended orientation until the time I passed my written and oral comprehensive exams. This growth can be further seen in the time which has passed from comprehensive exams until finishing the dissertation. One of my leadership traits which has developed through the course of this dissertation was impacted by Heifetz and Laurie (1997/2011). Heifetz and Laurie

(1997/2011) wrote about six leadership ideas within their adaptive work concept. The one that stands out in my mind is “get on the balcony” (p. 61). Writing a dissertation is essentially like being on a balcony – there is the micro level and the macro level in which you are engaging to achieve the end goal. It was imperative for me to keep both of those ideas within solid reach. There were times where I needed to focus on the trends and patterns while also addressing the bigger issues at hand. When I was too far off of the balcony, I relied on my dissertation advisor to strengthen my confidence that I could complete the process and climb to other balconies. My relationship with my dissertation advisor strengthened my leadership style as he was able to help me put the process in perspective. He helped shape who I am as an educational leader. As I look back, I am confident the scholarly leadership exhibited by my dissertation advisor is one I will keep with me.

Bruffee

My appreciation for Bruffee (1999) has grown during the dissertation process. I wish we had learned about him during Summer one but I am eternally grateful that we learned about him at all. I would not be where I am today without the sentiments of Bruffee. The leadership shown by my cohort peers to rally behind each other stems from the workings of Bruffee. Bruffee (1999) stated “Education initiates us into conversation, and by virtue of that conversation initiates us into thought” (p. 133). This was so important during this time as some of my cohort peers would gather on Wednesday nights to discuss each dissertation and offer encouragement. This dissertation is an individual work but one that also comes at the hand of numerous Wednesday nights of

discussion and brainstorming. The leadership lessons I learned from not only Bruffee but my fellow cohort peers will continue with me even as the dissertation is complete.

Concluding Thoughts

The dissertation in practice has been a thought provoking experience and one I would not change given the opportunity. The challenges I faced through the course of this process are ones which have made me stronger in the areas of being a scholar and an educational leader. Organizational structure, data collection, scholarly culture, frames, leadership style/traits, and Bruffee (1999) are all elements which have contributed to the end product. The dissertation in practice also stretched my thinking and has helped evolve my credibility in the workplace.

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Appendix A

Interview Protocol

Welcome

Good afternoon. My name is _____, and I am a doctoral student in University of Missouri's Educational Leadership and Policy Analysis program. I appreciate you taking the time to share your experiences with me as I conduct my dissertation research.

Overview of Topic

The purpose of my research is to explore the experiences of Title IX Coordinators.

Ground Rules

I invited you to participate in this interview because I am interested in your own unique experiences, and I hope you feel comfortable sharing your point of views. I recognize you have a different perspective and I welcome your view points.

I am recording the session so I can concentrate on your experiences. I will not include any names, and your comments are confidential; information will be viewed by my dissertation advisor, Dr. James Sottile and my dissertation committee.

Opening

- Tell me how long you have been working at XXX (i.e. small private, public, community college, etc.).

Introductory

- What factors influenced you in applying for your current position?
- Describe your typical day to me.

Transition

- When searching for jobs, how did you determine if you were qualified for this position?
- How did you find this job?

Key Questions

- What do you think are the necessary credentials (i.e. education/ experience) for this position?
- How do you stay up-to-date on laws, policies, and procedures?
- What title does your supervisor hold?

- What department/ office/ service do you think your supervisor should be under or a part of?
- How does your job on a daily basis differ from what your job descriptions details what you should be doing?
- What resources are available to you?
- What influences your practice?

Ending Questions

- If you were given the opportunity to speak with a representative from the Office of Civil Rights, what would you want them to know about your job?
- What else would you like to share about your experiences as a Title IX Coordinator?

Thank you for taking the time to meet with me today and for sharing your thoughts.

Appendix B
Title IX Coordinator Interview Consent Form

Researcher Name: Andrea Weber

Project Number:

Project Title: A qualitative examination of the role definition, organizational positioning, and job qualifications of Title IX Coordinators

Please consider this information carefully before deciding whether to participate in this research.

Introduction: You are being asked to participate in a research study. This research is being conducted to understand the experiences of Title IX Coordinators. When you are invited to participate in research, you have the right to be informed about the study procedures so that you can decide whether you want to consent to participation. This form may contain words that you do not know. Please ask the researcher to explain any words or information that you do not understand.

You have the right to know what you will be asked to do so that you can decide whether or not to be in the study. Your participation is voluntary. You do not have to be in the study if you do not want to. You may refuse to be in the study and nothing will happen. If you do not want to continue to be in the study, you may stop at any time without penalty or loss of benefits to which you are otherwise entitled.

Description: I am an EdD student at the University of Missouri – Columbia in the Educational Leadership and Policy Analysis program, and I am interviewing Title IX Coordinators for my dissertation.

Purpose of the research: To understand the experiences of Title IX Coordinators. There will be about 10 people who will take part in the study from higher education institutions in Missouri.

What you will do in this research: If you decide to volunteer, you will be asked to participate in one interview, and you **may** be asked to participate in an observation. You will be asked several questions, some of which will be about your educational and work experiences. With your permission, I will tape record the interview in order to focus on the conversation.

Time required: The interview will take about 1 1/2 hours. If you are asked to participate in the observation, it will take approximately 4 hours. You can stop participating at any time without penalty.

Risks: No risks are anticipated.

Benefit: To advance the qualitative research on Title IX Coordinators' experiences.

Cost: There is no cost to you.

Confidentiality: Your responses to interview questions will be kept confidential. At no time will your actual identity be revealed. Excerpts from the interview may be included in my dissertation or other later publications. Information produced by this study will be stored in the investigator's file and identified by a code number only. The code key connecting your name to specific information about you will be kept in a separate, secure location.

Participation and withdrawal: Your participation in this study is voluntary, and you may refuse to participate or withdraw from the study at any time. You may withdraw by informing the researcher that you no longer wish to participate (no questions will be asked). In addition, you may skip any question during the interview, but continue to participate in the rest of the study. You will also be informed of any new information discovered during the course of this study that might influence your health, welfare, or willingness to be in this study.

To Contact the Researcher: If you have questions or concerns about this research, please contact: Andrea Weber, 417-766-1308, andreaweber@missouristate.edu. You may also contact the faculty member supervising this work: Dr. James Sottile, Associate Dean, College of Education, Missouri State University, 417-836-5326, Jamessottile@missouristate.edu.

Questions or concerns: If you have any questions regarding your rights as a participant in this research and/or concerns about the study, or if you feel under any pressure to enroll or to continue to participate in this study, you may contact the University of Missouri Campus Institutional Review Board (which is a group of people who review the research studies to protect participants' rights) at (573)882-9585 or umcresearchcirb@missouri.edu.

A copy of this Informed Consent form will be given to you before you participate in the research.

Agreement:

The nature and purpose of this research have been sufficiently explained, and I agree to participate in this study. I understand that I am free to withdraw at any time without incurring any penalty. I know that I can remove myself from the study at any time without any problems.

Appendix C

Qualitative Participant Identifier Table

Type	Description	Participant Identifiers
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Appendix D

Qualitative Artifact Data Sources with Assigned Identifiers Table

Identifier	Category	Location	Number
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Appendix E

Job Description Data Sources with Identifiers

Identifier	Location	Description	Number
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Appendix F
Observation Guide

Physical Setting	Participants
Activities and Interactions	Conversations
Subtle Factors	My Behavior

Appendix G

Practitioner Field Notes Log

This log will be electronic and include jottings that will be reflections and summaries the researcher may glean from conversations, observations, and interpretations throughout the study.

VITA

Andrea Weber grew up in Sterling Heights, MI and earned a Bachelor's Degree in Human Resource Development from Oakland University in Rochester Hills, MI. After traveling as a consultant for Alpha Delta Pi sorority for one year and working at Adrian College for two years, she completed her Master's Degree in College Student Personnel from Bowling Green State University in Bowling Green, OH. She graduated from Bowling Green State University in 2005 and then worked at Lehigh University until 2008. In 2008, Andrea began working at Missouri State University as the Assistant Director of Student Engagement for Fraternity and Sorority Life. In 2014, Andrea was promoted to Director of Student Conduct at Missouri State University. Andrea completed her Ed.D in Educational Leadership and Policy Analysis from the University of Missouri-Columbia in 2016. Andrea has been married to Donald Terry Weber, Jr. since 2005 and they have two children, Landon and Peyton together.