

2019

The Effect of Training and Institutional Support on Title IX Coordinators' Responses to Sexual Violence on College Campuses

Mercedes M. Pino

Follow this and additional works at: https://nsuworks.nova.edu/fse_etd



Part of the [Educational Administration and Supervision Commons](#), and the [Higher Education Commons](#)

Share Feedback About This Item

This Dissertation is brought to you by the Abraham S. Fischler College of Education at NSUWorks. It has been accepted for inclusion in Theses and Dissertations by an authorized administrator of NSUWorks. For more information, please contact nsuworks@nova.edu.

The Effect of Training and Institutional Support on Title IX Coordinators' Responses
to Sexual Violence on College Campuses

by
Mercedes M. Pino

An Applied Dissertation Submitted to the
Abraham S. Fischler College of Education
in Partial Fulfillment of the Requirements
for the Degree of Doctor of Education

Nova Southeastern University
2019

Approval Page

This applied dissertation was submitted by Mercedes M. Pino under the direction of the persons listed below. It was submitted to the Abraham S. Fischler College of Education and approved in partial fulfillment of the requirements for the degree of Doctor of Education at Nova Southeastern University.

David Weintraub, EdD
Committee Chair

Cathern Wildey, EdD
Committee Member

Kimberly Durham, PsyD
Dean

Statement of Original Work

I declare the following:

I have read the Code of Student Conduct and Academic Responsibility as described in the *Student Handbook* of Nova Southeastern University. This applied dissertation represents my original work, except where I have acknowledged the ideas, words, or material of other authors.

Where another author's ideas have been presented in this applied dissertation, I have acknowledged the author's ideas by citing them in the required style.

Where another author's words have been presented in this applied dissertation, I have acknowledged the author's words by using appropriate quotation devices and citations in the required style.

I have obtained permission from the author or publisher—in accordance with the required guidelines—to include any copyrighted material (e.g., tables, figures, survey instruments, large portions of text) in this applied dissertation manuscript.

Mercedes M. Pino

Name

January 25, 2019

Date

“It's easy to feel helpless - like you can't fight the tide. But remember: small actions can have a huge impact, and one person like you can inspire others to action.” –
Celeste Ng

I want to start by thanking God. I am blessed to be covered by His never-ending, amazing grace.

I want to thank my parents, Juan and Marianela Pino. They left Cuba over 50 years ago and started from scratch in a foreign land. My parents wanted to live in a country where they were free to pursue opportunities that were no longer available to them at home. They put their all into building a decent home for me and my siblings. I am beyond grateful for the sacrifices they made, as well as for their support and love.

I thank all the grandparents, aunts, uncles, and godparents that always believed in me. They shared their stories and love. They proved that it does indeed take a village.

I want to thank my nieces (Kenyeta Pino, Deja Pino, and Demi Pino), whom I adore. Their love and laughter inspire me.

To my best friends, Kimberly White and Erica Edwards-O'Neal. Thank you both for always giving me a place to vent and be distracted.

To Dr. Richard Louis. Thank you for the guidance and support throughout this process. You served as a pace car and motivated me when I couldn't muster it up on my own. You made countless hours in the library tolerable.

To my chair, Dr. David Weintraub. Thank you for your patience and guidance. To my committee member, Dr. Cathern Wildey, thank you for your assistance and feedback. To Dr. Jennifer Reeves, thank you for making numbers kind of make sense. I would still be staring at SPSS cofounded if not for your help.

Thank you to all of the Title IX Coordinators that took the time out to help me develop this study, as well as those that took the time out to respond.

And last but not least, to all of the women, near and far, that have been impacted by sexual violence...you are heard. Thank you for your bravery.

Abstract

The Effect of Training and Institutional Support on Title IX Coordinators' Responses to Sexual Violence on College Campuses. Mercedes M. Pino, 2019: Applied Dissertation, Nova Southeastern University, Abraham S. Fischler College of Education. Keywords: Title IX, Title IX Coordinators, Dear Colleague Letter, Department of Education, Office for Civil Rights, Clery Act, VAWA, sexual assault, sexual violence, sexual harassment, training, institutional support

One out of five women in college are victims of sexual assault. The uptick in cases being brought before the US Department of Education for the mishandling of sexual assault cases on college campuses raises a question about the adequacy of the training and support being received by Title IX Coordinators. This study was designed to determine whether Title IX Coordinators are receiving adequate support and sufficient training necessary to adhere to the federal mandates regarding sexual assault on campus, as well as how the Title IX Coordinators' years of experience relate to the challenges they face.

Using SurveyMonkey, a survey instrument developed by the researcher was sent to Title IX Coordinators at Division I colleges and universities. Utilizing open-ended and Likert-scaled questions, the researcher looked at the adequacy of the support being received by Title IX Coordinators, the sufficiency of the training being received by Title IX Coordinators, the specific challenges faced by Title IX Coordinators, and how the perception of those challenges changed based on the years of experience of the Title IX Coordinators. The researcher obtained responses from 83 participants. The results indicated that the Title IX coordinators' perceptions were that they were receiving adequate support and sufficient training. The perceptions of their challenges decreased with the number of years spent in the role. The results also showed there is a need for increased training directly from federal agencies. Further study is recommended on the impact of changes in policies with the new administration.

Table of Contents

	Page
Chapter 1: Introduction	1
Statement of the Problem.....	1
The Topic and Research Problem.....	4
Background and Justification.....	6
Deficiencies in the Evidence.....	7
Audience	8
Definition of Terms.....	8
Purpose of the Study	10
Chapter 2: Literature Review	11
Overview.....	11
Theoretical Framework.....	14
Evolution of Federal Regulations	15
Guidance From the Dear Colleague Letters.....	20
The Clery Act.....	22
Violence Against Women Act	25
Implications for College and University Administrators.....	28
Existing Institutional Responses	31
Research Questions	38
Chapter 3: Methodology	39
Introduction.....	39
Participants.....	39
Instruments.....	40
Procedures.....	44
Limitations	47
Chapter 4: Results	48
Introduction.....	48
Demographic Characteristics	48
Data Analysis	49
Summary	61
Chapter 5: Discussion	63
Introduction.....	63
Summary and Interpretation of Findings	64
Implications of Findings	68
Limitations of the Study.....	72
Future Research Directions	73
References.....	75

Appendix
Title IX Coordinator – Training & Support Survey86

Tables

- 1 Survey Respondent Demographic Information49
- 2 Percentage of Funding for Non-University Training Programs52
- 3 Correlation Analysis Results60
- 4 Results of Survey Questions Related to Title IX Coordinator Concerns71

Figures

- 1 Number of Government-Sponsored Training Programs Attended53
- 2 Relationship Between Years of Experience and Challenges Faced61

Chapter 1: Introduction

Statement of the Problem

Whether as a victim, accused, or innocent bystander, sexual assault is becoming a common part of the college experience. One out of five women in college are victims of sexual assault (White House, 2014). The problem studied, as it relates to campus administration, was the way sexual assault cases are being handled on college campuses. The uptick in cases being brought before the US Department of Education for the mishandling of sexual assault cases on college campuses raises a question about the adequacy of the training and support being received by Title IX Coordinators. Having a strong understanding of the existing regulations, is a key component of that training.

There are currently three federal regulations that address campus safety in general and sexual assault in particular – the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act), the Campus Sexual Violence Elimination Act (Campus SaVE), and Title IX of the Educational Amendments (Title IX). Title IX addresses the matter of discrimination based on gender. Sexual assault and sexual harassment are the severest forms of sexual discrimination (Wilson, 2015). The responsibility of colleges and universities in investigating allegations of sexual violence under Title IX is clarified in three documents issued by the United States Department of Education’s Office for Civil Rights (OCR), the 2011 Dear Colleague Letter (DCL), 2014’s *Questions and Answers on Title IX and Sexual Violence*, and the 2015 Dear Colleague Letter (2015 DCL).

In the document addressing questions raised by Title IX and sexual violence, the OCR clarified the obligation of colleges and universities, stating that a school “must take

immediate and appropriate steps” when it knows or “reasonably” should be aware of sexual violence incidents (United States Department of Education, Office for Civil Rights, 2011b, p. 15). However, the guidance does not address the issue of underreporting. Although sexual assault is a serious crime impacting many college and university women, it often goes unreported. Studies show that only 12% of sexual assaults are reported (The White House, 2014).

The other document issued by the Office for Civil Rights, and often cited in the literature, is the DCL. The DCL details the requirement for all institutions receiving federal financial aid funds to have a Title IX Coordinator. According to the DCL, Title IX Coordinators have the authority to coordinate institutional compliance with Title IX. Coordinators are tasked with ensuring that senior school officials are informed of Title IX incidents (United States Department of Education, Office for Civil Rights, 2011a). The DCL also requires that Title IX Coordinators receive “adequate” training. However, the only guideline given for the content of the training is that it should allow for an understanding of what constitutes sexual violence and the respective institutions’ grievance procedures (United States Department of Education, Office for Civil Rights, 2011a). Adequate training is a theme continued in the 2015 DCL, in which the OCR stated that “some of the most egregious” Title IX violations stem from a lack of training and authority (United States Department of Education, Office for Civil Rights, 2015, p. 1). The 2015 DCL also notes the importance of institutional support for Title IX Coordinators to be effective in coordinating Title IX compliance for their college or university (United States Department of Education, Office for Civil Rights, 2015).

Significant strides have been made by legislators; however, there is still much to be done by colleges and universities to promote and disseminate effective sexual assault policies and procedures. There is increased responsibility to maneuver the existing legislation and create policies that are clear, that direct students to the appropriate resources, and that are fair to both the victim and the accused (Safko, 2016). According to Safko, cases where higher education institutions have impinged upon the rights of the accused and denied them a fair proceeding has increased. Higher education institutions must consider the chilling effect of policies that are impartial and favor one party over the other. Along similar lines, colleges and universities should consider creating safe harbor for students that may have been engaged in activities that violate institutional policies, such as underage drinking, while the Title IX violation occurred. Fear of repercussion for their own behavior may deter victims from reporting incidents of sexual violence (Dunn, 2014).

Additionally, colleges and universities must ensure their policies do not conflict with existing campus policies or with federal regulations such as Title IX (Dunn, 2014; Rammell, 2014). Conflicting policies only serve to confuse students and discourage reporting. Effective policies and procedures clearly make students aware of what constitutes sexual violence and how to identify the hallmarks of non-consensual sexual encounters. Definitions listed under individual campus policies should incorporate those under existing federal regulations (Dunn, 2014). Those definitions and policies must then be disseminated campus wide to ensure awareness amongst all students.

The Topic and Research Problem

In 2015, the Association of American Universities surveyed over 150,000 college students from 27 universities across the country. The survey found that nearly 25% of female college students responded that they experienced some form of sexual contact without their consent (Wallace, 2015).

Sexual assault is, however, not just a matter of concern for victims and higher education administrators tasked with responding to the allegations; it has risen to the level of national crisis, receiving unprecedented attention at the federal level. In 2014, President Barack Obama created a task force to address the issue. In his speech launching the “It’s on Us” initiative he stated, “It is on all of us to reject the quiet tolerance of sexual assault and to refuse to accept what’s unacceptable” (The White House, 2014). Although the call for action was made, questions remain as to how higher education administrators should address the issue of sexual assault on campus.

According to Dungy and Gordon (n.d.), student affairs administrators have historically been called on to ensure existing regulations are implemented and carried out. Higher education administrators are expected to create policies and procedures that assist in preventing sexual assault or, at a minimum, create an environment that fosters the trust necessary to report cases of sexual assault when they occur. However, student affairs administrators are struggling under the pressure of trying to meet the government’s standards with regards to getting approval for their efforts (Wilson, 2015, para. 10). The extent of the struggle is evidenced by the number of cases that are being filed with the United States Department of Education against colleges and universities for mishandling sexual assault accusations.

One of the problems administrators face is the low percentage of victims reporting sexual assaults. James and Lee (2015) researched whether students' perceptions of authority figures influence their decision to report sexual victimization. Their research suggested several reasons why students do not report sexual assault, including fear of being blamed or fear of retaliation. Studies show that 0% to 5.3% of student survivors report incidents of sexual assault using university reporting procedures (Holland & Cortina, 2017; Lindquist et al., 2013). Victims have demonstrated a preference for disclosing to informal support providers (i.e. friends) rather than formal support providers (i.e. university programs) (Fisher, Daigle, & Cullen, 2010). There is an assumption by survivors that they will be no better off for filing a report with the administration (Cantalupo, 2011). This leads to questions of how sexual assault allegations are investigated.

The efforts to help students dealing with sexual assault go beyond the creation of effective policies and procedures by higher education administrators. College and university leaders that are unwilling to fairly and consistently implement their policies are already paying the price in the court system. The University of Colorado Boulder had to pay \$2.85 million to two plaintiffs that alleged the university had evidence of sexual violence but failed to act upon the information. In addition to the judgment, 13 university officials, including the president and football coach, lost their jobs. At Eastern Michigan University, the university had to pay \$350,000 for each of 13 separate violations of the Clery Act in a case involving the rape and murder of a student. In addition, the university settled with the family for \$2.5 million and terminated the president, vice president for student affairs, and the director of public safety (Cantalupo, 2011).

These figures reflect that the implications can be costly for leaders that choose not to act. According to Napolitano (2014), president of the University of California and former United States Secretary of Homeland Security, the decision for presidents is clear. Napolitano stated that the following objectives for university officials: “combat sexual violence; navigate the legal and regulatory challenges inherent to doing so; and, more broadly, foster a culture of respect, inclusion, and civility” (p. 389).

Background and Justification

According to Cantalupo (2011), news stories and reports are filled with stories of “survivors” that are no better off for reporting incidents of sexual violence to university officials. There is a belief that students reporting to university officials are worse off than those that engage the criminal justice system (Cantalupo, 2011). The regulations are imposing expectations upon Title IX Administrators to carry out quasi-judicial investigations. According to Gala and Gross-Schaefer (2016), administrators are being asked to adjudicate cases that have historically proven to be difficult for the criminal justice system. According to Peter F. Lake, chair and director of the Center for Excellence in Higher Education Law and Policy at Stetson University’s College of Law, there is a perception that the requirements “keep getting bigger and broader and more challenging all the time” (Mangan, 2016, para. 9). This seems to support the need for more training and the development and implementation of more effective policies and procedures.

Despite guidance in the DCL, the number of investigations conducted by the U.S. Department of Education continues to increase. As of July 2017, there were 339 cases of potentially mishandled sexual assault allegations being investigated by the Department of

Education. Of these cases, 117 stemmed from Division I colleges and universities (The Chronicle of Higher Education, 2017). According to Rammell (2014), a growing number of cases stem from incidents of sexual violence involving male college athletes. Rammell found that while male athletes only comprise 3.3% of the college population, they account for 19% of the perpetrators of sexual assault. Due to the high number of cases stemming from college athletics, this study focused on Division I colleges and universities.

Deficiencies in the Evidence

With nearly 25% of college women reporting that they have been sexually assaulted on a college campus, administrators are faced with a major concern. Although the Office for Civil Rights has provided a general framework for colleges and universities to follow during investigations of sexual assault on campuses, the resolution agreements released by the Office of Civil Rights in response to investigations show that finding a seamless investigative process is a moving target. In their article, Moorman and Osborne (2016) highlighted the April 2011 Department of Education's Dear Colleague letter as a useful instrument in laying out the obligations of colleges and universities in investigating allegations of sexual assault. However, the authors point out that incidents of sexual assault on campuses have continued to increase at a disturbing rate since the letter was issued.

Although higher education institutions have revised their policies and procedures to be compliant with federal regulations, the problem persists. Moorman and Osborne (2016) specifically pointed out that although courts are not legally bound by the guidelines issued by the Office for Civil Rights, they serve as "authoritative guidance" as

to the U.S. Department of Education's meaning under Title IX (p. 557). While the guidance may allow colleges and universities to implement unique ways to implement school sexual assault policies, there is a very specific set of practices that every school must have in place: "(1) every school must have and distribute a policy against sex discrimination; (2) every school must have a Title IX Coordinator; and (3) every school must have and make known procedures for students to file complaints" (Moorman & Osborne, 2016, p. 561).

The literature focuses exhaustively on the obligations of colleges and universities and the need for more effective policies; however, there has been little research on the adequacy and sufficiency of the training and support Title IX Coordinators receive. Due to the complexities involved in carrying out the regulations, there appears to be a need to better understand examine the training being provided.

Audience

With a more in-depth examination, Title IX Coordinators, along with senior college administration, may be able to create and institute effective policies and procedures which can help reduce sexual assault on campuses and benefit students, especially sexual assault survivors, the tools they need to not be re-victimized by their colleges or universities.

Definition of Terms

The following are definitions of terms used throughout this study. The definitions are given to provide in depth understanding for the reader.

Campus Sexual Violence Elimination Act (Campus SaVE). This act amended the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The act

requires higher education institutions to provide training to students, faculty, and staff relating to the prevention of rape, domestic violence, sexual assault, and stalking (CampusClarity, 2013).

Dear Colleague Letter (DCL). Letter issued by the Office of Civil Rights of the Department of Education to provide guidance and practical examples to carry out the requirements of Title IX relating to sexual violence (United States Department of Education, 2011).

Division I. The National Collegiate Athletic Association has three divisions for college athletic programs. Division I schools generally have the largest student bodies and athletic budgets. There are approximately 350 Division I schools (NCAA, 2017).

Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act). Requires all colleges and universities that receive federal aid to report annual crime statistics and campus security information. Colleges and universities are required to: Publish and Annual Security Report, have a public crime log, disclose crime statistics for occurrences on campus, issue timely warnings for crimes that pose a serious or ongoing threat to students and employees, create emergency responses, and enact policies and procedures (Duncan, 2014).

Sexual Assault. Occurs when physical, sexual activity is engaged in without the consent of the other person or when the other person is unable to consent to the activity. (University of California, n.d.).

Sexual Harassment. Sexual harassment is conduct that: 1) is sexual in nature; 2) is unwelcome; and 3) denies or limits a student's ability to participate in or benefit from a school's education program. (United States Department of Education, 2008).

Sexual Violence. Physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent due to the victim's use of drugs or alcohol or disability. Sexual violence includes rape, sexual assault, sexual battery, and sexual coercion (Aronowitz, 2014).

Title IX. "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance" (Title IX of the Education Amendments of 1972).

Title IX Coordinator. Coordinators are responsible for coordinating school efforts to comply with and carry out its *Title IX* responsibilities. Every school must have a Title IX Coordinator. Coordinators must have adequate training and must be able to explain the school's grievance procedure (United States Department of Education, 2008).

Purpose of the Study

The purpose of this quantitative study was twofold: to determine (a) whether Title IX Coordinators at Division I colleges and universities are receiving adequate support and sufficient training necessary to adhere to the federal mandates regarding sexual assault on campus, and (b) how the Title IX Coordinator's years of experience relate to the challenges they face in their current role. A deeper examination of the training being received by Title IX Coordinators and the challenges they face when they do not receive the appropriate support may help in the implementation of processes that reduce the number of incidents of sexual assault on college and university campuses, which could foster a safer environment for students.

Chapter 2: Literature Review

Overview

The purpose of this study was to determine whether Title IX Coordinators at Division I colleges and universities are receiving adequate support and sufficient training necessary to adhere to the federal mandates regarding sexual assault on campus, and to examine how Title IX Coordinator' years of experience relate to the challenges they face in their current role. Without expanded training, higher education administrators remain with questions regarding what constitutes a fair process or effective policies and procedures on the matter, or how those policies should be disseminated to students. The literature largely reflects concerns about these questions, as well as concerns with the way colleges and universities are generally addressing the issue of sexual assault.

Nationwide concerns regarding sexual assault first came to prominence more than 30 years ago (Stewart, 2016). At the time, there were reports that sexual assault cases were going unreported and being poorly handled. Since then, there have been attempts to downplay the extent of the crisis and blame it on media exaggeration. According to Stewart, a theory exists that campus sexual assault is not actually a crisis, but instead it is what social scientists call moral panic. However, as far back as 1990, then-Senator Joe Biden completed research on what would become the Violence Against Women Act (VAWA) and attempted to dispel this theory. Biden stated, "We are helpless to change the course of this violence unless, and until, we achieve a national consensus that it deserves our profound public outrage" (White House Council on Women and Girls, 2014, p.34).

The campus sexual assault crisis started receiving more attention in 2014, when President Obama's administration tagged it as a critical issue. In addition to reauthorizing VAWA in 2013, President Obama tasked his administration with finding ways to make colleges and universities safer through the White House Task Force to Protect Students from Sexual Assault (White House Task Force). The White House Task Force was asked to (a) provide colleges and universities with best practices for preventing and responding to sexual assault on campus, (b) build on the federal government's responses, (c) increase public awareness of the issue, and (d) increase accountability for colleges and universities (White House Council on Women and Girls, 2014). The need for the White House Task Force seems justified, with studies showing that sexual assault is increasing on campuses at an alarming rate.

Sexual assault is prevalent on college campuses, with 19% of female college students reporting that they have been a victim of non-consensual sexual contact during their college experience (Duncan, 2014). According to Moorman and Osborne (2016), statistics from 2014 show that college and university campuses in the United States reported 2,831 incidents of domestic violence, 3,191 incidents of dating violence, and 4,462 incidents of rape. The problem is not isolated to women, 8% of college-aged men have reported being a victim of rape or of an attempted rape (Potter et al., 2016). This issue has widespread implications that extend beyond the victims to the rest of the campus community to create a hostile learning environment (Jones, 2014; United States Department of Education, Office for Civil Rights, 2011a).

The matter is further complicated because an overwhelming majority of incidents are not reported to the administration (National Sexual Violence Resource Center, 2015;

James & Lee, 2015). More than 90% of sexual assaults are unreported and 42 % of victims never tell anyone at all (Cantalupo, 2012; Duncan, 2014). The reasons most frequently given are fear of retaliation or lack of confidence in the existing processes and procedures (Cantalupo, 2011). This lack of confidence is reflected in the increasing number of Title IX complaints being filed against colleges and universities for inadequately processing complaints of sexual assault (Jones, 2014). Concerns from students are also reflected in the call from students to have clear and concise policies on campuses to address sexual assault (Potter et al., 2016).

In addition to the lack of confidence, the research shows that Title IX Coordinators are frustrated by the expectations being imposed upon them by the investigation guidelines. The frustration stems from a lack of training to conduct the judicial process (Jones, 2014). Training is an essential part of effectively fulfilling the role of Title IX Coordinator. According to the United States Department of Justice, Office of Violence Against Women (2016), the subtleties associated with sexual violence are typically not part of a person's academic training; however, there is a need for anyone dealing with victims, even professionals with extensive experience, to receive ongoing training. Even the most concerned administrator is often unprepared or has only received minimal training to deal with students who are dealing with the effects of trauma (Franklin, Taylor, & Beytagh, 2017).

In addition to a perceived lack of training, judicial cases can be demanding on investigators in terms of the amount of time consumed and the personal toll taken on administrators (Jones, 2014). A staff person interviewed by Jones referred to the time

spent working on a sexual assault case as one of the darkest times in her life. This illustrates the need for support for Title IX Coordinators.

Theoretical Framework

The Health Belief Model was originally developed by the Public Health Service between 1950 and 1960 by Godfrey Hochbaum and Irwin Rosenstock. The model was further developed by Rosenstock in 1974. The theory was primarily used to study the preventive and health risk behavior of individuals (Downing-Matibag & Geisinger, 2009; Lin, Simoni, & Zemon, 2005; Rosenstock, 1974; Rosenstock, Strecher, & Becker, 1988). The Health Belief Model indicates that health-related decisions or avoidance actions are taken based on the belief that they are: (a) personally vulnerable, (b) that dealing with the disease would have at least a moderate impact on some aspect of their life, and (c) that action on their part would be beneficial in reducing the severity of the condition and that acting would not come at a cost to them (Rosenstock, 1974). Bandura's social cognitive theory has contributed to the Health Belief Model by introducing the concept of self-efficacy into the model (Rosenstock et al., 1988). Self-efficacy allows researchers to better understand a person's belief in their own capability to perform (Bandura, 1977).

As was previously discussed, one of the obstacles to fully addressing sexual assault on college campuses is the lack of reporting. There are several factors that impact a student's desire to seek help (Eisenberg, Hunt, & Speer, 2012). According to Eisenberg et al., the Health Belief Model would help explain students' individual approaches to their perceived need and desire to seek help. Health Belief model also gives administrators insight into how those perceptions can be modified by adjusting the campus environment (Kim, Ahn, & No, 2012). Understanding these components provides

administrators the knowledge needed to create comprehensive policies and procedures that address not only the desire to seek help, but students' perception of their own possibility of being victims of sexual assault. Awareness gained using the Health Belief Model to understand student perceptions can serve as a guideline for the training received by higher education administrators.

Evolution of Federal Regulations

There are three federal laws that regulate how institutions address campus security generally and sexual assault specifically. Title IX, and the pursuant “Dear Colleague” letters issued by the United States Department of Education in 2011 and 2015, provide guidance regarding how colleges and universities handle allegations of gender discrimination. The Clery Act requires colleges and universities to report crime and campus security information in a timely manner. The Violence Against Women Act, and one of its amendments (Campus SaVE), focuses on increasing accountability for matters of campus violence (Duncan, 2014).

Title IX of the Education Amendments Act of 1972. The scope of Title IX regulations has evolved since 1972, when President Nixon signed it into law. Modeled after the Civil Rights Act of 1964, Congress passed Title IX with the intention of creating a general mandate addressing the issue of gender discrimination. Section (a) of Title IX of the Education Amendments of 1972 reads, “No person in the United States shall, on the basis of sex, ...be subjected to discrimination under any education program or activity receiving federal financial assistance.” Originally, the legislation focused on institutional “program[s] or activit[ies]”. The reach of the legislation was expanded in 1988, through the Civil Rights Restoration Act, which broadened “program or activity” to include all

college or university operations (Anderson, 2012, p. 343). Additionally, the scope of the legislation goes beyond student athletes and protects all students regardless of physical ability, national origin or legal status, sexual orientation, or gender identity (United States Department of Education, Office for Civil Rights, 2014a).

Early legislative history of Title IX is void of references to campus sexual violence. Sexual harassment was not considered a form of gender discrimination until 1979, when Catharine Mackinnon wrote a revolutionary book making the claim for a connection (Henrick, 2013). During the following decade, the United States Department of Education's Office for Civil Rights (OCR) would promulgate guidance expanding Title IX to prohibit sexual harassment.

During the 1980s, the reach of the legislation was expanded to include sexual violence. A series of court cases, involving students suing their colleges for mishandling harassment and assault complaints, led to legal reforms recognizing sexual harassment as a form of gender discrimination (Wilson, 2015). Later, in 2003, a Yale University student – Kathryn Kelly – sued Yale for allegedly mishandling her accusation of sexual assault. In the lawsuit, *Kelly vs. Yale University*, the judge held, “There is no question that a rape...constitutes severe and objectively offensive sexual harassment” (Kingkade, 2014, para. 10). Following the lawsuit, the case law explicitly included sexual assault as the worst possible form of sexual harassment.

However, the OCR did not issue its first guidance on how Title IX applies to sexual harassment until 1997 when it published *Sexual Harassment Guidance* (Anderson, 2012). The guide explained that sexual harassment was in fact a form of gender discrimination covered under Title IX (Anderson, 2012). In addition to defining the

parameters for sexual harassment, Title IX establishes the obligations of institutions to conduct a “prompt, thorough, and impartial” investigation into allegations of Title IX violations (Henrick, 2013, p. 52). Institutions of higher education are prohibited from retaliating against individuals that bring forth complaints. Colleges and universities are also required to do their part to stop harassment, implement prevention plans, and assist in providing remedies for the impact on the student(s) (Duncan, 2014).

Case law and the right to relief under Title IX. The implementation of Title IX has largely been established through case law. The first significant case for students seeking remedy for Title IX violations was the establishment of an individual’s right to sue an educational institution. This right was established in *Cannon v. University of Chicago*. In *Cannon* (1979), the Court determined, in pertinent part, that, although Title IX does not explicitly state the right to sue, the legislative intent was to “benefit . . . persons discriminated against”. The Court further held that a right to sue existed if the person bringing forth the suit fell under the protected class (in this case women) and the suit addressed the purpose and intent of the legislation (Cannon, 1979).

As written, the only financial remedy available through Title IX is the termination of federal funds provided to an institution covered under the legislation (Anderson, 2012). The ability to sue for monetary damages was established in *Franklin v. Gwinnett County Public Schools*, where the Court held that because a federal right existed there was a presumptive right to appropriate remedies, including monetary remedy (Franklin, 1992).

Having established the right to sue and the potential for financial liability, in *Gebser v. Lago Vista Independent School District* the Court established the standard

required for successful litigation. The Supreme Court of the United States found that students wishing to bring a lawsuit must meet two criteria. The Court set the following criteria: 1) the student must show that a school official, with the ability to “institute corrective measures”, knew the harassing behavior occurred; and 2) the student must show that the institution failed to act in an appropriate manner (Gebser, 1998). The Court upheld its findings in *Davis v. Monroe County Board of Education*, adding that students have the right to civil action against an institution when the actions of an institution or another student are egregious enough to impinge upon the private right to education established in Title IX (Davis, 1999; Block, 2012).

Another form of remedy available to students is through an administrative process with the authoritative federal agency, the OCR. The administrative process requires a lesser standard than civil actions. In the OCR process, the requirement is that the institution “knew or should have known” about the occurrence of sexual harassment. Institutions found out of compliance in these cases are, typically, asked to voluntarily resolve the matter (Duncan, 2014). Disciplinary actions from the OCR may also include the termination of federal funds to any institution found to be in violation of the statute (Henrick, 2013).

The cost of noncompliance. The expectation of higher education institutions has been well established in the case law and literature; however, a series of highly-publicized cases alleging mishandling of accusations show there is still a need for guidance. Cantalupo (2012) analyzed prominent cases involving Title IX violations. One of the cases was *Simpson v. University of Colorado*, in which two college women were gang raped during a program held despite the university having prior knowledge of

sexual violence. The case resulted in the university hiring a Title IX specialist, firing the President and 12 other university officials, and paying \$2.85 million to the plaintiffs (Cantalupo, 2012; Rammell, 2014). In another case, against Arizona State University, a student was raped by a student athlete that was readmitted after a coach intervened, despite the student athlete having previously been expelled for misconduct that included sexual harassment. The university settled for \$850,000 (Cantalupo, 2012).

While it is impossible to completely avoid liability, implementing comprehensive policies and procedures will help in avoiding litigation and potentially change the culture surrounding sexual violence on campus (Rammell, 2014). However, the efforts to help students dealing with sexual assault must go beyond the creation of effective policies and procedures. In their article, Streng and Kamimura (2015) pointed out that despite new legislation to promote effective resolution of sexual assault allegations most incidents of sexual assault remain vastly underreported. The rationale students gave for not reporting was generally a fear of coming forward, primarily due to a lack of awareness and fear of re-victimization.

The implications of ineffectively supporting students dealing with sexual assault goes beyond legal consequences, it can impinge upon a student's education. According to Streng and Kamimura (2015), research shows that survivors of sexual assault are more apt to drop out and report psychological disorders, which prevents them from benefitting from a proper learning environment. If the purpose of higher education institutions is to create a safe learning environment that provides care for and shows respect for individuals, as is stated in Eastern Michigan University's core values, then institutions are failing their students (Franklin et al., 2017). Accordingly, it seems colleges and

universities need to conduct extensive self-assessment and consider existing guidance in examining the effectiveness of their sexual assault policies for the benefit of student safety and wellbeing.

Guidance From the Dear Colleague Letters

The United States Department of Education, Office for Civil Rights (OCR), issued Title IX guidance to colleges and universities in the form of the 2011 “Dear Colleague” letter (DCL). The DCL was drafted to assist institutions in meeting the obligations of Title IX, by explaining the pertinent Title IX requirements related to sexual harassment and sexual violence. The DCL defines the types of sexual harassment and assault covered by Title IX. It also includes guidance related to efforts that can be undertaken by colleges and universities to proactively promote awareness and prevent violence (United States Department of Education, Office for Civil Rights, 2011a).

The DCL clearly states that under Title IX a school that “knows or reasonably should know” of existing sexual harassment is required to take “immediate action to eliminate” the situation (United States Department of Education, Office for Civil Rights, 2011a, p. 4). The obligation to investigate exists even when the assault occurred off campus. The DCL also clarifies that law enforcement investigations do not relieve administrators of their requirement to conduct an independent investigation. While the DCL requires proper investigation, it does not require colleges and universities to adopt a policy specifically geared toward the prohibition of sexual harassment or sexual violence. However, if a school chooses not to adopt a specific sexual misconduct policy, they must ensure that their general policy is not so vague as to violate Title IX (United States Department of Education, Office for Civil Rights, 2011a).

The DCL includes an acknowledgement that the detailed requirements outlined in Title IX necessitate training for all parties involved in the complaint or investigation process. The DCL suggests that training would allow administrators, students, and staff to have a better understanding of what constitutes sexual violence, how to identify the warning signs, and how to appropriately respond. Specifically, the DCL notes the importance of training for Title IX Coordinators. According to the DCL, it is important that Title IX Coordinators have “adequate training” to understand how to fully enforce their college or university’s grievance procedures and ensure the institution complies with Title IX and other applicable federal regulations (United States Department of Education, Office for Civil Rights, 2011a). The importance of training was confirmed in the OCR’s 2015 “Dear Colleague” letter (2015 DCL).

The 2015 DCL served as a reminder to colleges and universities that they must designate at least one employee to serve in the Title IX Coordinator role. It also emphasized the importance of providing training and support for the Title IX Coordinators. The 2015 DCL reiterated that all previous guidance, including the 2011 DCL, remained in effect. Mostly, the 2015 DCL focused on the designation of a Title IX Coordinator and their responsibilities and authority (United States Department of Education, Office for Civil Rights, 2015).

Role of Title IX Coordinators. Both the 2011 and 2015 DCLs address the requirement of designating “at least one employee” to oversee compliance, the Title IX Coordinator (United States Department of Education, Office for Civil Rights, 2011a; United States Department of Education, Office for Civil Rights, 2015). Title IX Coordinators are charged with coordinating their institution’s compliance with Title IX

and implementing a grievance procedure for assisting students in resolving their Title IX complaints. Title IX Coordinators must have appropriate access and authority to review and investigate all complaints arising out of Title IX matters. Additionally, Title IX Coordinators are responsible for examining outcomes and maintaining an awareness of patterns and how they impact the campus climate (United States Department of Education, Office for Civil Rights, 2015). The responsibility for implementing campus policies and procedures related to Title IX falls on the Title IX Coordinator, as well as ensuring the rights of students are not violated.

Rights of students. To assist students in understanding their rights and the obligations of their colleges and universities, the OCR has issued a document entitled *Know Your Rights: Title IX Requires Your School to Address Sexual Violence*. The document provides the text for Title IX and details the obligations higher education institutions are required to follow, such as responding “promptly and effectively”, providing protection during the investigation process, providing “confidential support services”, conducting an “adequate reliable, and impartial investigation”, and employing the steps necessary to remediate the hostile environment (United States Department of Education, Office for Civil Rights, 2014a).

The Clery Act

A noteworthy change in campus security came in 1990, stemming from an incident in Bethlehem, Pennsylvania. In 1986, Jeanne Clery, a freshman at LeHigh University, was beaten, raped, tortured, sodomized, and strangled (Beyette, 1989). Clery’s killer was a 20-year-old sophomore, Joseph Henry, who gained access to the dormitory through doors that had been left propped open. Clery’s parents accused the

university of having a “rapidly escalating crime rate” (Beyette, 1989). The Clerys ultimately filed a \$25-million lawsuit against the university, which was later settled. In addition to the settlement, in 1987, they started a non-profit organization speaking out in support of increased security measures on college campuses. Today, the organization is known as the Clery Center for Security on Campus. Although Henry was convicted and sentenced to death, the Clerys wanted to ensure no other parents suffered a similar fate. Ultimately, they took their crusade to Congress. The result of their fight was the Congressional approval of the 1990 Crime Awareness and Campus Security Act. In 1991, it was renamed and became the Jeanne Clery Act (Clery Center, n.d.).

Although sexual violence is addressed in the Clery Act, it is not the primary purpose. The legislative intent for the Clery Act is to promote transparency surrounding crimes on campus, which enables prospective students and parents to make more informed decisions (Cantalupo, 2012). At its core the Clery Act, which can be found in subsection (f) of chapter 20 in the United States Code Service, makes it a requirement for all higher education institutions that receive federal funds to disclose campus security information and report annual crime statistics (Duncan, 2014). Failure to comply with the requirements set forth in the Clery Act may result in the imposition of fines by the Department of Education (Cantalupo, 2012).

The Clery Act calls for the collection of crime statistics on campus. The reports should be made public by employing the following three methods: 1) a daily crime log, 2) by issuing timely warnings of threats to the campus, and 3) inclusion of statistics in an annual report (Dunn, 2014). The annual report should detail the policies and procedures for campus community members to report crimes and other emergencies that occur on

campus. The report should include the security personnel available on campus, how campus security works with local enforcement agencies, the policies used to encourage community members to accurately report crimes to the appropriate authorities, and statistics concerning a specific list of criminal offenses occurring within the specified two-year period (Clery Center, n.d.).

Beyond reporting, colleges and universities are also responsible for creating awareness on campus regarding sexual assault under a 1992 amendment known as the Campus Sexual Assault Victim's Bill of Rights (Cantalupo, 2012; Dunn, 2014).

Institutions are required to create programs designed towards promoting prevention and raising awareness of domestic violence, dating violence, sexual assault, and stalking.

Students must be informed as to how they can report, the sanctions that can be imposed, and how they can access support services (Dunn, 2014). The Clery Act also specifies provisions for the victims of the above-mentioned crimes to protect their rights, privacy, and avoid retaliation and further victimization of students reporting sexual crimes (Cantalupo, 2012).

The cost of noncompliance. As with Title IX, students have the right to file complaints against colleges and universities for violations of the Clery Act. According to Cantalupo (2012), public records show the three highest fines for Clery Act violations have ranged from \$27,500-\$350,000. Mount St. Clare College has the dubious distinction of being the first school to be fined for Clery Act violations. In 2000, the school was fined \$25,000 for two rape incidents that although reported to the police went unreported in the campus statistics because the accused were never charged (Cantalupo, 2012).

The second-largest fine for noncompliance came in 2001 at Salem International University in the amount of \$200,000. The university in this case failed to report five sex offenses. Salem International also failed to provide support services on a consistent basis, discouraged students from reporting crimes, and were accused of retaliating against those students that did report (Cantalupo, 2012).

The highest fine was levied against Eastern Michigan University in the amount of \$350,000 for 13 violations of the Clery Act. The fine came in 2006 after the rape and murder of Laura Dickinson. Dickinson was murdered in her dormitory room by another student. Initial reports regarding the involvement of another student were misleading. It was not until two months later that the family was informed of the arrest of the perpetrator. The Department of Education in this case found that Eastern Michigan failed to issue a timely warning, but instead issued misleading statements, misreported statistics, and did not maintain adequate policies to ensure the safety of the campus (Franklin, Taylor, Beytagh, 2017). The case resulted in the termination of the President, Vice President for Student Affairs, and the Director of Public Safety. Eastern Michigan ultimately paid an estimated \$3.8 million in fines, settlement, legal fees, and severance packages (Cantalupo 2012; Franklin et al., 2017).

Violence Against Women Act

Introduced by then-Senator Joe Biden in 1990, the Violence Against Women Act (VAWA) was signed into law by President Bill Clinton in 1994. It was originally part of a broader crime bill, the Violent Crime Control and Law Enforcement Act of 1994. According to Sacco (2015), the policy was proposed to fulfill two goals: 1) improve the investigative and prosecutorial process; and 2) assist governments, institutions, groups,

and individuals intended to change societal attitudes regarding violence against women. To that end, VAWA included the following provisions: The Federal Rape Shield law, enhanced legal and financial support, and community violence prevention programs (Beggs & Walker, 2013). Regarding restitution for victims, VAWA also established civil remedies allowing victims to seek civil penalties from the alleged perpetrators. Additionally, through the grant programs, VAWA assists with the needs of domestic violence, sexual assault, and dating violence victims (Sacco, 2015).

In the 20 years since its original passage, VAWA has been reauthorized three times. The 2000 reauthorization modified VAWA to include, among other things, the inclusion of victims of dating violence. In 2005, VAWA was reauthorized to augment penalties for repeat stalking offenders (Sacco, 2015). It was not until 2013, that VAWA was expanded to include sexual violence on college campuses. The amendments included protection for student victims, as well as a requirement for higher education institutions to record and report incidents in more detail (Beggs & Walker, 2013). The amendments also instituted new guidelines for universities that required colleges and universities to develop programs aimed at preventing domestic violence, sexual assault, stalking, and dating violence (Sacco, 2015). Specifically, Section 304 of the VAWA Reauthorization imposed new requirements on higher education institutions under a provision entitled the Campus Sexual Violence Elimination Act (Campus SaVE).

The Campus Sexual Violence Elimination Act. The Campus SaVE Act, which was signed into law by President Obama in 2013, served as an amendment to the Clery Act – requiring higher education institutions to tackle sexual violence on campus; however, it should be noted, nothing in this act relieves colleges and universities from

their obligations under Title IX (United States Department of Education, Office of Civil Rights, 2014b). Campus SaVE expanded the reporting requirements to include crime statistics on dating violence, domestic violence, stalking, as well as sexual assault. Sexual assault was changed to reflect the more comprehensive FBI definition of sex offenses (Dunn, 2014). The amendment also requires colleges and universities to include their prevention policies in their annual report. The education programs must be provided to new employees and incoming students (American Council on Education, 2014; Dunn, 2014).

Beyond prevention and reporting, the amendments provide requirements regarding the investigation and disciplinary hearings process. Campus SaVE requires higher education institutions to provide victims with written information on their rights. These rights include the right to confidentiality, resources – such as counseling services, legal assistance, and medical care – available on and off campus, and available accommodations (Duncan, 2014; Dunn, 2014). Victims must also be informed regarding disciplinary policies and possible sanctions and outcomes. Under Campus SaVE, victims may also request changes that allow them to avoid a hostile environment. In addition to rights for the victim, the amendments address rights of the accused, such as the right to a prompt, fair, and impartial hearing. Both the victim and the accused also have the right to have others present at the hearing for support (American Council on Education, 2014; Duncan, 2014).

While Campus SaVE has expanded existing laws, it was not fully embraced when it was signed into law. Concerns surrounding the law were related to the required standard of evidence or, more specifically, to the lack of a requirement. Campus SaVE

requires colleges and universities to include the standard of evidence in their disciplinary policies; however, it is silent as to which standard of evidence should be used. Unlike the 2011 Dear Colleague Letter, which stated that the standard used must be preponderance of evidence. Critics of the law argued that colleges and universities were implementing harsher standards of evidence which required a higher burden of proof. The lack of guidance from Campus SaVE in this matter also created a greater burden for campus administrators in creating fair disciplinary procedures (American Council on Education, 2014; Duncan, 2014). The expansion in legislations has only created a greater need for college and university administrators to determine the best way to comply with all the laws and obligations discussed in this study.

Implications for College and University Administrators

The depths of the campus sexual assault problem became clear when the Office for Civil Rights (OCR) started publishing the names of higher education institutions being sued for mishandling allegations of sexual assault. Ricketts (2015) noted that in May 2014 OCR published a list that set the spotlight on 55 colleges and universities that were not in compliance with Title IX based on their mishandling of allegations of sexual assault. According to the *Chronicle of Higher Education* (2017), as of November 2017, that number had risen to 351. Ricketts expressed concern for the impact such sustained pressure for action on colleges and universities will have on campus policies. The conversations regarding the mishandling of several high-profile cases, has led many to question the role colleges and universities play in creating an atmosphere that condones sexual assault.

One of the recommendations of the White House Task Force was for college and university administrators to conduct campus climate surveys. The recommendation came from a sentiment expressed by Vice President Joe Biden 20 years earlier when he was a senator writing VAWA, “no problem can be solved unless we name it and know the extent of it” (White House Task Force to Protect Students from Sexual Assault, 2014, p. 7). In its report, the White House Task Force provided resources for higher education institutions to develop and conduct campus climate surveys. The surveys would allow campus administrators to have a better sense of the scope of sexual assault issues on campus and determine students’ level of awareness and their attitudes, which would in turn allow administrators to develop more effective and informed solutions and safer environment.

Along the lines of understanding the role campus environments play, Stotzer and MacCartney (2016) specifically studied campus-related factors that may be creating an environment that is more prone to incidents of sexual assault. Another study, conducted by Streng and Kamimura (2015), reviewed the policies of 10 public universities. In their research, Stotzer and MacCartney found that there are substantial problems in how, if at all, sexual assault cases are reported, as well as with the ensuing investigation. Their study looked at 524 colleges and university campuses to analyze the institutional factors that impacted the number of sexual assaults on campus. They recommended that administrators focus on how institutional, structural, and/or cultural factors make sexual assaults more likely. The Streng and Kamimura (2015) study found that three of the universities did not have explicit sexual assault policies. The remaining higher education institutions had policies that varied in depth and scope. Streng and Kamimura

recommended that comprehensive policy revisions were needed, as well as more research on how policies affect student attitudes toward policies aimed at preventing sexual assault.

Lessons from other higher education issues. Historically, there have been other issues that have gained the same level of attention as that of sexual assault on college campuses. One of those issues was the rise in deaths involving drunk driving in the 1980s. Potter (2016) recommends that colleges and universities attempting to reduce sexual assault on campus look to the drunk driving movement for guidance. The article lays out the similarities and differences between the two movements. Potter points out that the two movements are different in that sexual assault on campus is largely focused on an adult population, whereas the drunk driving movement focused largely on adolescents. Another difference pointed out is that unlike drunk driving, sexual assault, for the most part, occurs in private – as such it can be harder to gather evidence and prosecute. The most significant difference noted by Potter is the element of victim shaming. Victims of drunk driving are not blamed or asked to justify their actions to excuse the behavior of the accused. One of the keys pointed out by Potter is changing mindsets, which would allow the focus of sympathy to be shifted. How colleges and universities address the issue of sexual assault on campus sets the tone for how victims are viewed and treated by others.

Elimination of the rape culture on campus. The research shows that there is much work to be done in creating a supportive environment for students, one that goes beyond the creation of effective policies and procedures. One of the recommendations is to create an environment that does not tolerate the so-called “rape culture.” Young (2015)

wrote on the ability of colleges and universities to eliminate rape culture amongst college students and society in general. First discussed in the 1970s, rape culture is the culturally constructed myth that emboldens males to commit sexual violence against women without fear of repercussion (Aronowitz, 2014).

Young's article brought to light a situation at the University of Wisconsin – Madison where the editor-in-chief published an opinion letter, even though she herself found it “reprehensible.” In the letter, entitled “‘Rape Culture’ Does Not Exist,” the student, David Hookstead, argued that rape does not happen because culture allows it; instead he proposed that rape happens because there are bad people in the world. Young (2015) argued that rape is a consequence of extreme notions of sexual roles in society – an ideology that is perpetuated in the media. She goes on to recommend that college campuses are in the best position to “correct” social attitudes of students.

Existing Institutional Responses

The institutional response of colleges and universities has a significant impact on the persistence of sexual violence on campus. The number of complaints with the Office for Civil Rights against colleges and universities is continually increasing. Hartmann (2015) suggested there should be concern regarding the decrease in students reporting sexual assault, while the number of complaints increases. Hartmann also pondered the possibility that existing response procedures are unrealistic and should be reviewed. Other researchers place the blame directly on administrators and not on the policies. According to Cantalupo (2012) administrators are the “(in)capable guardians”, with the implication being that administrators are currently failing in their responsibility to protect students or solve the problem. The perception is that higher education institutions remain

purposefully oblivious to incidents of sexual violence on campus and then create policies that make it harder for victims to report acts of sexual assault. The belief, whether warranted or not, has created a lack of confidence in the administration to effectively handle allegations of sexual assault (Cantalupo, 2012).

The lack of confidence is reflected in the low reporting rates across colleges and universities. The lack of reporting perpetuates a cycle of violence, since victims and perpetrators feel there will not be consequences to the violence. The appropriate response would be for colleges and universities to create policies that encourage reporting, enforce accountability, and provide resources for students (Cantalupo, 2012). However, Cantalupo, discourages colleges and universities from imitating the criminal justice system. Instead, administrators should create supportive environments that respect the rights of students (Block, 2012).

Barriers to student reporting. The creation of services, unfortunately, does not ensure that students in need will use them. According to Sinozich and Langton (2014), college students (80%) are less likely to report sexual assault than nonstudents (67%). There are many barriers that keep students from using available sources or reporting incidents of sexual assault. According to Walsh, Banyard, Moynihan, Ward, and Cohn (2010), a barrier to reporting can be any factor that deters students from telling someone else about the assault or its effects. Allen, Ridgeway, and Swan (2015) referred to three specific considerations for students that may serve as barriers: (a) understanding that there is in fact a problem, (b) deciding that they want or need help, and (c) determining which services and resources are available for support. Another significant consideration are the circumstances surrounding the incident.

According to Wolitzky-Taylor et al. (2011), nearly 85% of the cases involving the sexual assault of college women are committed by a non-stranger. In addition, underage drinking is very common in college and is also known to be a risk factor for cases of assault. These factors decrease the possibility of victims reporting, which contrasts with a victim that has been assaulted by a stranger or a victim that may have sustained visible injuries (Wolitzky-Taylor et al., 2011). Cases involving force were more likely to report the crime or use victims' services than those where the victim was somehow incapacitated (Sabina & Ho, 2014).

In their study, Holland and Cortina (2017) found that out of 284 women that experienced some form of sexual assault only 16 disclosed the event to campus support – of the 16 only five filed a formal report with the Title IX office. Respondents expressed concerns with accessibility of services (including confidentiality), acceptability (e.g. minimizing behaviors, judgement, and negative consequences), and usefulness of services. Others felt that having used their informal support system there was no longer a need to involve the university. To avoid negative reactions and potential embarrassment, it is more common for victims of sexual assault to confide in informal support providers (e.g. friends, family, etc.) than to report to the police or campus administrators (Holland & Cortina, 2017).

Negative effect on completion rates. The United States Supreme Court, in *Brown v. Board of Education*, made it clear that an education “is a right which must be made available to all on equal terms” (Brown, 1954, para. 2). The courts have long held that victimization can restrict or deny student access to an education (Bolger, 2016). The trauma experienced by victims can limit student ability to learn due to a variety of

physical and psychological complications. Victims of sexual violence can suffer from post-traumatic stress disorder, depression, eating disorders, anxiety, an increased likelihood for substance abuse, and higher suicide rates (Bolger, 2016; Chang et al., 2015; Hartmann, 2015; Mengo & Black, 2015; Potter et al., 2016).

Research shows that sexual violence not only impacts the student physically, it also interferes with their right to an education. By extension, failure by a college or university to provide appropriate support, training, and/or prevention programs for students also restricts students' rights to an education. According to Bolger (2016), students that have been victimized will attempt to avoid their assailants on campus by skipping classes, avoiding community areas, transferring, or even dropping out of college. Even if victims decide to continue their education, their grades invariably suffer (Bolger, 2016).

Mengo and Black (2015) conducted a study examining the impact of physical and sexual victimization on the academic performance of students. Their sample included 74 students that reported their GPA before and after an incident of violence. The study found that there was a statistically significant decline in the students' GPAs from before to after experiencing sexual violence. While 12.1% of students experienced a decline after physical or verbal victimization, 34.1% of sexual violence victims experienced a decline in their GPA. In a similar study, Jordan, Combs, and Smith (2014) found that students that experienced sexual violence during their first semester were more likely to have a lower GPA than those that had not experienced trauma. According to Jordan et al. the correlation was even more significant when the student was a victim of rape specifically. Beyond impacting the student, the lower GPAs becomes an issue for universities since

this can lead to retention issues (Mengo & Black, 2015). These studies show the need for college and universities to create a safe and supportive environment for all students, especially those that have been victimized (Mengo & Black, 2015).

Conveying policies and procedures to students. While there is still debate as to the balance needed in creating effective policies and procedures, there seems to be consensus that colleges and universities need to do a better job of training students and disseminating prevention information to them. To assist with this, the White House Task Force provided a checklist to aid administrators in creating “accessible, user-friendly” policies (White House Task Force to Protect Students from Sexual Assault, 2014). Richards (2016) replicated a 2002 study of a nationally representative group of higher education institutions conducted by Karjane, Fisher, and Cullen. Richards used the 2013 National Center for Education Statistics Integrated Postsecondary Education Data System’s (IPEDS) data for their study to find United States higher education institutions that were Title IV participants. The final sample of the study consisted of 842 higher education institutions, made up of a cross section of institutions. Richards found that while a clear majority of institutions had specific policies regarding sexual violence, only three percent required students to confirm that they read and understood the existing policy. The study also found that only 60% of the institutions included the policy in their student handbook.

Potter et al. (2016) discussed the need for implementing clear and concise policies, while providing adequate training to students. There is not a uniform method for conveying information to students across colleges and universities. In researching the issue, Potter et al. (2016) found a lack of literature on effective ways to disseminate

sexual harassment and sexual assault policies to students. The research they found discussed the effectiveness of delivering policies related to tobacco and alcohol use. Seeing a gap in the research, Potter et al. conducted a study on prevention programs that can be applied to teaching students about the options available to reduce or prevent sexual misconduct. As part of the study they evaluated seven campuses across the country, including public, private, historically black, and Hispanic-serving universities. They ultimately found that additional work is needed in training students to be more involved in helping their peers.

In addition to providing prevention training, colleges and universities should consider the ease of finding the appropriate policies and procedures on their websites. Lund and Thomas (2015) focused on the information colleges and universities share on their websites with regards to sexual assault on campuses. According to the Department of Education's 2011 "Dear Colleague" letter, higher education institutions are required, under Title IX, to investigate allegations of sexual harassment and sexual violence on campus between students and faculty. The DCL also recommends that higher education institutions provide prevention information; however, higher education institutions are given leeway in the information they disseminate to students. The information required by the Department of Education includes posting policies and procedures regarding making complaints. Lund and Thomas found this basic information to be inadequate and suggested that schools supplement the information provided. For their study, Lund and Thomas examined 103 college and university websites. They found that most higher education institutions did not provide adequate information. Lund and Thomas

recommend that higher education institutions include information relating to consent and the physical and psychological effects of sexual assault.

Schwartz, McMahon, and Broadnax (2015) also focused on the information provided to students on college and university websites. They specifically looked at whether colleges and universities are effectively conveying information relating sexual assault in a way that is accessible to students. While higher education institutions are recommended to place the information on their websites, there is currently no system in place to evaluate how effectively this is being done. Schwartz et al. cited a study completed in Ohio that found 66% of the higher education institutions had sexual assault policies listed on their websites; however, they failed to provide any additional information to help students find resources or prevent sexual assault on campus. They, however, felt that research was needed to conclude if this was indicative of practices in other states. As a result, Schwartz et al. conducted a review of websites for colleges and universities in New Jersey. Their sample consisted of 28 college and university websites. They found that the information provided varied widely and that sexual assault was not being effectively addressed on many of the websites.

The White House Task Force report also noted that one of the best prevention strategies for college and university campuses is implementing a bystander prevention program. The White House Task Force suggested that teaching men to help those in danger and encouraging them to speak out against sexual violence is a critical prevention strategy. To start the conversation, the White House Task Force released a Public Service Announcement starring President Obama, Vice President Biden, and a variety of celebrities. They also provided colleges and universities with a fact sheet providing

guidance on bystander prevention programs (White House Task Force to Protect Students from Sexual Assault, 2014).

Research Questions

The review of the literature highlighted the complexities involved in complying with the various regulations geared at resolving the issue of sexual assault on college and university campuses. It also highlighted a general need for training and support for Title IX Coordinators, who are tasked with ensuring compliance with the obligations faced by higher education institutions. However, the literature was not specific with regards to the type of training and support needed by Title IX Coordinators or how the gap in the two impacts the challenges they face. The intent in conducting this study was to fill the gap in literature by answering the following research questions:

Research Question 1. How adequate is the support Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

Research Question 2. How sufficient is the training Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

Research Question 3. What are the specific challenges Title IX Coordinators at Division I colleges and universities face in order to adhere to the federal mandates regarding sexual assault on campus?

Research Question 4. How do Title IX Coordinators' years of experience relate to the challenges they face in their current role?

Chapter 3: Methodology

Introduction

This quantitative study was intended to measure the adequacy and sufficiency of the training and support Title IX Coordinators receive from their higher education institutions, as well as the challenges they face in their roles. The researcher also looked at the practices of higher education institutions in providing training and training opportunities for their Title IX Coordinators.

Quantitative research allows the researcher to collect data related to a specific problem and explain why it is occurring (Creswell, 2015). Quantitative research utilizes statistics to analyze data collected using an instrument (Creswell, 2015). This study collected data using a cross-sectional survey design. The cross-sectional survey design was intended to collect data related to the attitudes, beliefs, or practices at one specific point in time versus an extended period (Creswell, 2015). Specifically, this study disseminated a survey to gauge participants' attitudes at one point in time.

Participants

The population in this study were the 347 individual Title IX Coordinators of all Division I colleges and universities in the U.S. To gain a more comprehensive understanding of the support, training, and challenges faced by Title IX Coordinators, the survey instrument was sent out to all 347 coordinators.

According to Creswell (2015), in quantitative research, an important factor in reducing sampling error is to use as large a sample as possible from the population. A method that allows a researcher to reduce the possibility of sampling errors is census sampling. According to Cantwell (2008), a census provides researchers with the

opportunity to set all elements in a group and measure the characteristics of those elements. Accordingly, the study utilized census sampling. By using this survey method, the researcher was allowed to study all the possible respondents in the target population. Additionally, census survey limits sampling errors which are characteristic of sample surveys (Cantwell, 2008).

A mailing list, consisting of emails for the Title IX Coordinators at the 347 Division I colleges and universities, was created by the researcher. The emails were gathered directly from the websites of the 347 higher education institutions. The survey was distributed to the potential participants via the program SurveyMonkey. The participation email included the link for the survey. The participation letter informed participants of their rights and responsibilities, as well as those of the researcher to protect their confidentiality. The participation letter served as the method by which participants provided informed consent to participate in the study.

Instruments

Without an existing survey addressing the research questions in this study, the researcher developed an original survey. Potential surveys that this researcher found were either not compatible or did not specifically address the training of Title IX Coordinators in following federal regulations and creating effective policies and procedures. The two most relevant ones this researcher found came from an article on the education and training of psychologists regarding treating sexuality (Miller & Byers, 2009) and a dissertation aimed at understanding the investigation process of Title IX Coordinators (Peters, 2016).

This original survey instrument consisted of 37 questions and was divided into three sections: Section 1: support, Section 2: training, and Section 3: challenges. Twenty-five of the questions were closed-ended and based on a Likert-scale measurement tool. At the end of each of the sections there were open-ended questions asking the respondent to elaborate upon their support and training needs, as well as their overall challenges. The remaining questions asked the respondents to quantify the amount and type of training they received over the course of the last 12 months.

The first section of the survey instrument, Questions 1 – 9, focused on the first research question, the adequacy of the support being received. The support section was made up of eight Likert-scale questions. The available four possible response values ranged from *strongly agree* (1) to *strongly disagree* (4). The scale purposely omitted the neutral option. The support section was closed with an open-ended question to allow participants to provide additional comments.

The second section focused on the sufficiency of the training being received. The section regarding training, Questions 10 – 25, had seven questions related to the various possible training topics Title IX Coordinators received over the course of the last 12 months, as well as an estimated total for the overall hours of training received during that period. The training section also asked participants seven questions intended to have them reflect on the training they received using the same Likert scale in the support section. The section closed with an open-ended question to allow participants to provide comments on additional training they would like to receive.

The third, and final, section focused on challenges faced in the role of Title IX Coordinator. The challenges section, Questions 26-37, combined concerns that might

arise due to a lack of support and training and asked the participants to respond to nine Likert-scale questions. The questions were aimed at determining the perceived gaps in training and support. The survey ended with three open-ended questions intended to give the participants the opportunity to provide additional comments on the challenges faced, how training might assist in minimizing those challenges, and any overall comments they had about their role as a Title IX Coordinator. The open-ended questions also provided the researcher with a better understanding of the challenges faced that interfere with the creation and enforcement of effective policies and procedures that are not related to training or support. The information from this section was also used to answer the fourth research question, which examined the relationship between the years of experience a Title IX Coordinator has and the challenges they face.

Formative and summative committees were used to examine the validity and reliability of the survey. To solicit members to serve on the formative committee, the researcher reached out to Title IX Coordinators from a broad spectrum of Florida colleges and universities. I received confirmations from four Title IX Coordinators. The members were from a large, private research university in Florida; a small, private university in Florida; a private university with campuses in multiple states, including Florida; and a large, state college in Florida. As for the summative committee, the researcher's dissertation chair agreed to serve. Two of the other members of the summative committee were members of the Institutional Review Board at the researcher's place of employment, a small, private university. The fourth, and final, member of the committee was a professor from a large, private research university in Florida.

Feedback from the formative and summative committees. The formative committee provided initial feedback regarding the questions drafted by the researcher. The feedback focused mostly on clarifying the language in the original questions. The most significant feedback provided at this level was the addition of a question related to an overall number of hours of training received. One of the committee members addressed that they are unfamiliar with any training at the federal level and suggested the question be removed; however, it is important in the study to confirm whether this training exists.

The updated survey then went to the summative committee for review. The feedback provided further clarification, as well as a recommendation to include an “other” option for gender choices, to not be exclusionary. The most significant feedback received from the summative committees led to inclusion of a specific section addressing challenges in a subset of the questions. This feedback was beneficial in providing clarity not only to the survey, but to the direction of the research. These changes were again submitted to the formative committee without need for further revision.

Pilot study. For the pilot study, the researcher sent the instrument and a request for feedback to 25 Title IX Coordinators at Division II colleges and universities. Five participants responded to the request to take the survey and provide feedback. The participants found it took approximately 10 minutes to complete the 37 questions in the instrument. The feedback showed that the instructions were clear and easy to understand, the questions were not hard to understand, and the choices were mutually exclusive. Participants expressed there was no difficulty in responding to any of the questions, the

questions were presented in a logical order, and that their privacy was protected. There were, however, concerns expressed.

The first concern was regarding a response validation issue. One of the questions asks respondents to breakdown the percentages for the types of training they have received in the last 12 months. One of the options was other and asked respondents to write in the type of training and the percentage it accounted for. The validation was set to only accept numerical inputs. Based on the feedback, the validation has been adjusted and is now able to accept alphanumeric responses.

The other two concerns related to the structure of the questions. The first suggestion was to remove the “*neither agree nor disagree*” option for the Likert Scale. The feedback was that the neutral option allowed respondents to “hide.” The other suggestion was that the instrument should include questions regarding specific kinds of training. Edwards (2015) recommended areas that would enhance the level of training Title IX Coordinators receive. The areas of training discussed in the research by Edwards were added to the instrument. The above process resulted in the final version of the survey, which can be found in the Appendix.

Procedures

Data collection procedures. Data for this study was collected using a web-based questionnaire, sent to the participants via SurveyMonkey. The survey invitation was sent to the Title IX Coordinators at Division I colleges and universities upon IRB approval. A web-based survey was chosen as the most effective method to (a) allow for quick immediate delivery to the participants, (b) save money on postage, (c) avoid delays from mail delivery errors, and (d) make follow up options faster. Despite the benefits of

sending a web-based survey, the researcher was aware that is easy to ignore or delete an email. There was also the possibility of the e-mail being lost in filters set by the recipient or their organization. In this instance, the benefits outweighed the possible disadvantages.

The entire data collection process was completed during a 6-week period. Based on that timeline, the survey link was sent again to participants 2 weeks after the initial request. A final reminder was sent 2 weeks after the reminder. This reminder was intended to remind participants of the deadline, which was 2 weeks after the reminder. On average the participants completed the survey in under 8 minutes.

Data analysis procedures. The survey that was sent to all possible participants consisted of three sections, in addition to a brief demographics section, which corresponded with the research questions. The data was collected using SurveyMonkey. The data for all four research questions was analyzed using the summary information from SurveyMonkey. The data from the open-ended questions was also explored for common themes to provide additional information on the support, training and challenges faced by Title IX Coordinators.

Once collected, the data was organized and prepared in accordance with Creswell's (2015) steps for analyzing quantitative data. The first step was to create a codebook. According to Creswell (2015), a codebook allows researchers the ability to list the scores that will be assigned to certain questions. For example, for the Likert-styled questions, responses were assigned a value where *Strongly Agree* was equal to 1 and *Strongly Disagree* was equal to 4. The second step was importing the data into IBM's Statistical Package for the Social Sciences (SPSS).

The coded data for the first three research questions was analyzed using

descriptive statistics. By running descriptive statistics, the researcher was able to examine the mean, median, frequencies, and standard deviation, allowing for a summarization of the trends or tendencies in the data (Creswell, 2015).

The fourth research question was analyzed using inferential statistics, specifically the researcher used a correlation analysis. By using a Spearman's rho analysis, the researcher studied whether a relationship existed between two variables and determined the strength of that relationship (Huck, 2012). The Spearman's rho analysis focused on the degree of relationship between years of experience and challenges faced by Title IX Coordinators. The null hypothesis stated there is no relationship between the years of experience and the challenges faced by Title IX Coordinators. The alternate hypothesis stated there is an indirect relationship between the two variables. The data used to test this hypothesis was gathered from the question in the demographics section asking respondents to select their years of experience from a drop-down menu, as well as the questions from the challenges section. The identified challenges were looked at to determine whether a significant relationship existed between the two variables.

Role of the researcher. The researcher works as the director of student services of a graduate program at a small, private university. The university was pending accreditation at the time of the study and as such was not required to have a Title IX Coordinator. However, the researcher is responsible for counseling students in crisis. Additionally, the researcher has prior experience working misdemeanor domestic violence, including assault and battery resulting from intimate relationships, as an assistant state attorney. As such, the researcher had acquired the appropriate experience and background required to properly conduct this study. It should be noted the researcher

did not hold the position of Title IX Coordinator and had no ties to a Division I college or university that would allow for the coercion of participants or lead to researcher bias.

Limitations

Despite every effort to fully cover the training and support issues that Title IX Coordinators face, the researcher acknowledged that limitations exist in the topics addressed in the survey created. One limitation was direct knowledge of the day-to-day practices of Title IX Coordinators. While the researcher worked in higher education, specifically student services, hands-on experience in Title IX and related regulations was limited. Additionally, based on the response to requests sent out for the pilot study, the researcher anticipated that a low response rate would be an issue in this study. Though an effort was made to limit this issue by sending the survey to over 300 potential participants, a concern still existed that the response rate would be below 35%.

An additional limitation stemmed from the collection of e-mail addresses for the survey distribution. Using the list of Division I schools listed on the NCAA website, the researcher accessed each individual college and university Title IX website to compile the e-mail list. Some of the colleges and universities did not have accessible information or did not provide a contact e-mail address. This reduced the number of surveys that could be sent out.

Chapter 4: Results

Introduction

The purpose of this study was to measure the adequacy and sufficiency of the training and support Title IX Coordinators receive from their higher education institutions, as well as the challenges they face in their roles. The researcher specifically surveyed Title IX Coordinators at Division I colleges and universities. The study was based on the following four research questions:

1. How adequate is the support Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

2. How sufficient is the training Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

3. What are the specific challenges Title IX Coordinators at Division I colleges and universities face in order to adhere to the federal mandates regarding sexual assault on campus?

4. How do Title IX Coordinators' years of experience relate to the challenges they face in their current role? These research questions were addressed in a 37-item instrument that was sent out to Title IX Coordinators at Division I colleges and universities.

Demographic Characteristics

The survey was sent to 339 of the 347 Title IX Coordinators at Division I colleges and universities, eight of the higher education institutions in the original population did not have an email address listed on their website. Of the 339, there were 83 respondents,

for a response rate of 24.48%. The 83 respondents consisted of 21 males (25.3%) and 62 females (74.7%). The highest educational level attained by the respondents were as follows: Two received a bachelor's degree (2.4%), 29 received a master's degree (34.9%), and 52 received a doctoral degree (62.7%). The years of experience for the respondents spanned from less than 1 year to 21 years of experience. The participant demographics are summarized in Table 1.

Table 1

Survey Respondent Demographic Information

Background/Demographic Item	n	%	
Gender			
	Male	21	25.3
	Female	62	74.7
Education Level			
	Bachelor's Degree	2	2.4
	Master's Degree	29	34.9
	Doctoral Degree	52	62.7

Data Analysis

The study consisted of four research questions. Research Questions 1 – 3 were analyzed using descriptive statistics. The descriptive statistics allowed the researcher to examine the mean, median, and frequencies. Research Question 4 was analyzed using a Spearman's rho analysis. The correlational analysis allowed the researcher to examine the degree of relationship between years of experience and challenges faced by Title IX Coordinators. The SPSS software used to obtain the descriptive statistics and Spearman rank correlation analysis was version 25.0.

Research Question 1. The first research question focused on the adequacy of

support received by Title IX Coordinators from their institutions. This section consisted of nine Likert scale questions and one open-ended question. The breakdown of the nine survey questions are outlined below.

The first question asked respondents if they had the adequate overall support in the form of resources from their institutions. The majority of the respondents (63.9%) *agreed* or *strongly agreed* that they have adequate support, while 20 respondents (24.1%) *disagreed*. The second question asked respondents to rate if the technology they had was adequate to accommodate the demands of the office. Thirty-seven respondents (44.6%) *agreed*, while another 20 respondents (24.1%) *strongly agreed*. When asked if their office was fully staffed in the third question, 47 respondents (56.7%) either *disagreed* or *strongly disagreed*.

Question 4 asked respondents to rate if they felt fully supported by other administrators (e.g., deans). Sixty-seven respondents either *agreed* or *strongly agreed* that they felt supported (80.7%). The next question asked the Title IX Coordinators if they felt senior-level administration fully understood their role. Thirty respondents (36.1%) stated that they felt senior-level administration understood, while 28 respondents (33.7%) felt they did not understand. Fourteen respondents (16.9%) *strongly agreed* that they felt their role was understood by the administration. In Question 6, participants were asked if they felt fully supported by the senior-level administration. Sixty-four respondents (77.1%) felt fully supported by the senior-level administration.

Question 7 of the instrument asked the Title IX Coordinators if they had been given “appropriate authority” – as defined by the DCL – by the senior-level administration to effectively carry out their roles. Twenty-nine respondents (34.9%)

agreed that they had been given “appropriate authority” by senior-level administration, while 28 respondents (33.7%) *strongly agreed*.

The last Likert scale question, 8, asked the coordinators if they felt faculty fully supported their role. The majority of the respondents (68.6%) either *agreed* (51 respondents) or *strongly agreed* (six respondents) that the faculty fully supported them in their roles. The last question in the section was open-ended.

Overall, the respondents felt that they were adequately supported by their institutions. The median response for Research Question 1 on the Likert scale was *agreed*. Despite feeling supported, the respondents stated areas where the institutions could provide further support as part of the open-ended question. The recurring themes presented by the respondents were a request for more overall funding, additional staff to assist with investigations, increased case management technology, strategic communication to establish “appropriate authority” and understanding, and better salaries.

Research Question 2. The second research question focused on the sufficiency of training received by Title IX Coordinators from their institutions. This section consisted of eight Likert-scaled questions, eight questions related to the amounts of specific-types of training received, and one open-ended question. The breakdown of responses for those 17 questions are detailed below.

The first question in this section, Question 10, asked respondents to state the percentage of funding provided by their institutions for all off-campus training, including webinars. Fifty-nine respondents (71.1%) indicated that 100% of their off-campus training was covered by their institution, while seven participants (8.4%) responded that

they received less than 50%. The complete level of funding received is broken down in

Table 2

Percentage of Funding for Non-University Training Programs

Level of Funding	n	%
0%	4	4.8
1%-24%	2	2.4
25%-49%	1	1.2
50%-74%	2	2.4
75%-99%	4	4.8
100%	59	71.1

N=83

Question 11 asked respondents for an estimate on the hours of training they have received in their role. The range for this question was 0 – 51 or more. Twenty-six respondents (31.3%) indicated that they received 51 or more hours of training on their role, 8 respondents (9.6%) received 20 hours, and 6 respondents (7.2%) received 40 hours of training. The remainder of the responses were selected by 5 respondents or less.

Questions 12 – 16 asked respondents how they had received training within the last 12 months. This group of questions addressed how many trainings were off-campus, government-sponsored, external training webinars, and internal training webinars. A total of 41 respondents (49.4%) attended 2 or 3 off-campus training programs. The highest number of programs attended was nine, one respondent (1.2%) selected this option. The lowest number of off-campus programs attended was zero, with three respondents (3.6%) having selected this option.

For the government-sponsored training programs, 37 respondents (44.6%) attended zero and 23 respondents (27.7%) attended one. The highest number of

government-sponsored training programs attended was four, which was selected by one respondent (1.2%). Figure 1 illustrates the responses received related to government-sponsored training.

When asked about university-sponsored training programs, the majority of respondents (61.5 %) indicated that they attended between zero and two. Thirteen respondents (15.7%) attended zero, 23 respondents (27.7%) attended one, and 15 respondents (18.1%) attended two. Two respondents (2.4%) selected the 11 or more option.

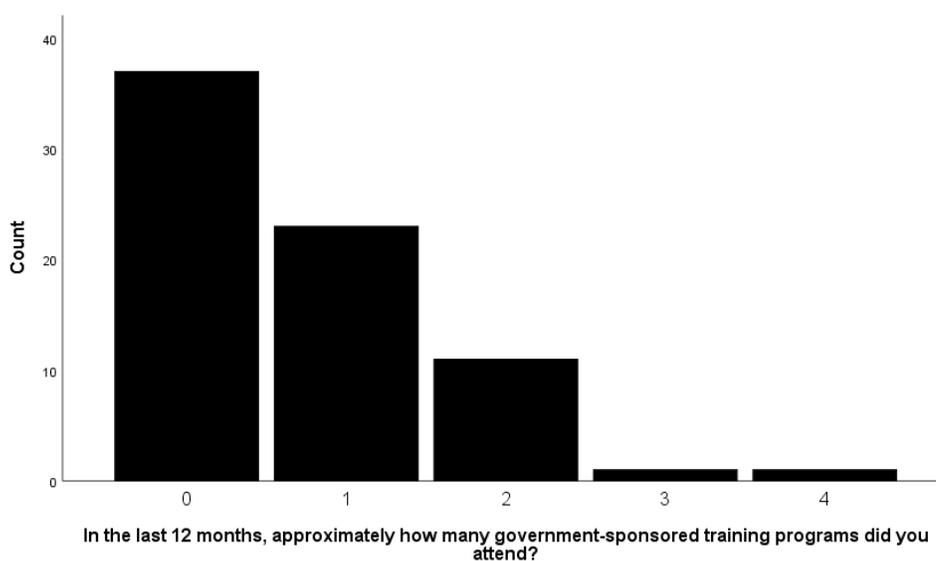


Figure 1. Number of government-sponsored training programs attended.

As it relates to webinars, 16 respondents (19.3%) indicated that they attended two external webinars in the last 12 months. Eleven respondents (13.3%) attended one external webinar, 14 respondents (16.9%) attended three external webinars, and 10 respondents (12%) attended five external webinars. Four respondents (4.8%) selected the 11 or more external webinars attended option, while three respondents (3.6%) attended zero external webinars. When asked about the number of internal webinars attended, 47 respondents (56.6%) indicated that they attended zero in the last 12 months. Eleven

respondents (13.3%) attended one internal webinar and seven respondents (8.4%) attended one internal webinar. The highest number of internal webinars attended was five, with one respondent (1.2%) selecting this option.

The next block of questions related to the sufficiency of the training received by the participating Title IX Coordinators. This set of questions were based on a Likert scale. Question 17 asked participants to reflect on the sufficiency of training received as it related to the proper standard of review. Forty-four respondents (53%) *strongly agreed*, 25 respondents (30.1%) *agreed*, and three respondents (3.6%) *disagreed* that they received sufficient training in this area. No respondents selected *strongly disagree* as an option.

Question 18 addressed the sufficiency of training on what constitutes consent. Two respondents (2.4%) *disagreed*, 23 respondents (27.7%) *agreed*, and 47 respondents (56.6%) *strongly agreed*. No respondents selected *strongly disagree*. In question 19, respondents were asked about the training received related to the role drugs and alcohol play in the ability to consent. One respondent (1.2%) *strongly disagreed*, four respondents (4.8%) *disagreed*, 26 respondents (31.3%) *agreed*, and 41 respondents (49.4%) *strongly agreed*.

Respondents were asked about the sufficiency of training on interviewing victims of sexual violence in question 20. One respondent (1.2%) *strongly disagreed*, four respondents (4.8%) *disagreed*, 31 respondents (37.3%) *agreed*, and 36 respondents (43.4%) *strongly agreed* that they received sufficient training on interviewing victims of sexual violence. Question 21 addressed training related to what constitutes sexual violence. Three respondents (3.6%) *disagreed* and 22 respondents (26.5%) *agreed*. The

majority of respondents, 46 respondents (55.4%), *strongly agreed* that they received sufficient training in this area.

The next question, 22, asked respondents about the sufficiency of training on how to conduct investigations. Forty-one respondents (49.4%) *strongly agreed* that they received sufficient training in how to conduct investigations, 26 respondents (31.3%) *agreed*, three respondents (3.6%) *disagreed*, and two respondents (2.4%) *strongly disagreed* that they received sufficient training. For question 23, respondents were asked if they received sufficient training on the effects of trauma. One respondent (1.2%) *strongly disagreed*, six respondents (7.2%) *disagreed*, 29 respondents (34.9%) *agreed*, and 36 respondents (43.4%) *strongly agreed* that they received sufficient training on the effects of trauma. Question 24 was the last question in the section related to the sufficiency of training. In this section, respondents were asked if they received sufficient cultural awareness training to understand the impact of sexual violence on students from diverse backgrounds. One respondent (1.2%) *strongly disagreed*, 14 respondents (16.9%) *disagreed*, 36 respondents (43.4%) *agreed*, and 21 respondents (25.3%) *strongly agreed* that they received sufficient training in the area of cultural awareness.

Question 25 asked respondents to fill in the approximate percentage of training received from specific sources within the last 12 months. The following options were provided to respondents: Self-study, from their institutions, from private sources, from local/state agencies, or from federal agencies. Respondents were also given the option of other. The mean response for those receiving training through self-study was 30.39%. For respondents receiving training from their institution, the mean response was 14.88%. The mean response for training from private sources was 42.60%. Training from local/state

agencies accounted for a mean response of 13.33%. The mean response for those receiving training from federal agencies was 5.98%. The “other” option accounted for a mean response of 11.96%. Some of the listed responses included, but were not limited to, legal training, training from a local rape crisis center, and training through a doctoral program.

The final question for Research Question 2 was an open-ended question asking respondents to provide additional training opportunities to help them be more successful as Title IX Coordinator. The requested training opportunities included case management, train-the-trainer, training sponsored directly by the U.S. Department of Education’s Office of Civil Rights, training with the administration so they can better understand the role of the Title IX Coordinators, understanding Title IX issues faced by international students, evidence coordination, cultural awareness training, more training with local law enforcement, and properly conducting investigations and drafting related reports.

Research Question 3. The third research question focused on determining the challenges faced by respondents in their role as Title IX Coordinators. This section consisted of 10 Likert-scaled questions and three open-ended questions. The results from this section are detailed below.

The first question in this section, 27, asked respondents if they felt they had not received sufficient training in the first three months of serving as Title IX Coordinator. The majority of the respondents either *disagreed* or *strongly disagreed* that they had not received sufficient training in the first 3 months of holding their position. Twenty-four respondents (28.9%) *strongly disagreed* and 35 respondents (42.2%) *disagreed* that they received insufficient training. Ten respondents (12%) *agreed* and two respondents (2.4%)

strongly agreed that they had not received sufficient training.

Question 28 asked respondents if they felt they were not receiving on-going training from their institutions necessary to be able to create effective sexual harassment/sexual assault policies and procedures. Thirteen respondents (15.7%) *agreed* and two respondents (2.4%) *strongly agreed* that they were not receiving needed on-going training. The majority of respondents (67.5%) either *disagreed* (39.8%) or *strongly disagreed* (27.7%) with the statement that they were not receiving on-going training.

The next question, 29, stated that one of the challenges faced was that they needed additional training on existing federal regulations related to sexual assault on campus. Thirty-two respondents (38.6%) *disagreed* and 17 respondents (20.5%) *strongly disagreed* with the statement. Eighteen respondents (21.7%) *agreed* and 4 respondents (4.8%) *strongly agreed* with the statement related to needing additional training on federal regulations.

Question 30 asked respondents if one of the challenges they faced in their role is when new regulations and updates come out that impact their roles as Title IX Coordinator, they do not receive adequate training. Two respondents (2.4%) *strongly agreed* and 20 respondents (24.1%) *agreed* they do not receive adequate training when new regulations come out. Thirty-one respondents (37.3%) *disagreed* and 18 respondents (21.7%) *strongly disagreed* with the statement that they do not receive adequate training on new regulations.

The next question asked Title IX Coordinators whether they have sufficient time on the job to keep up with changes in federal policies and regulations. The responses were nearly evenly split on whether they *agreed* or *disagreed*. Twenty-six respondents

(31.3%) *disagreed* and nine respondents (10.8%) *strongly disagreed* that they do not have sufficient time to keep with changes in policies and regulations. Ten respondents (12%) *strongly agreed* and 26 respondents (31.3%) *agreed* that they do not have sufficient time to keep up with changes in federal regulations and policies.

Question 32 asked respondents if one of the challenges they face in their role is that the existing regulations are not specific. Twenty-seven respondents (32.5%) *disagreed* and four respondents (4.8%) *strongly disagreed* with the statement that federal regulations are not specific. Twenty-nine respondents (34.9%) *agreed* and 11 respondents (13.3%) *strongly agreed* that the regulations are not specific.

The following question asked Title IX Coordinators if the existing regulations are unclear. Thirty-six respondents (43.4%) *agreed* and eight respondents (9.6%) *strongly agreed* that existing regulations are unclear. Twenty-two respondents (26.5%) *disagreed* and four respondents (4.8%) *strongly disagreed* with the statement that existing federal regulations are not clear.

Question 35 asked respondents if they felt that one of the challenges faced in their role is that they do not receive sufficient training on how to conduct investigations. Twenty-six respondents (31.3%) *strongly disagreed* and 38 respondents (45.8%) *disagreed* that with the statement that they do not receive sufficient training on conducting investigations. Five respondents (6%) *agreed* and two respondents (2.4%) *strongly agreed* that they do not receive sufficient training on how to conduct investigations.

The last Likert-scaled question, number 36, asked respondents if one of the challenges they face in their role is that they do not receive adequate support from their

university in ensuring new policies and procedures are disseminated campus wide. Six respondents (7.2%) *strongly agreed* and 20 respondents (24.1%) *agreed* that they do not receive adequate support in disseminating new policies and procedures on campus. Twenty-seven respondents (32.5%) *disagreed* and 18 respondents (21.7%) *strongly disagreed* with the statement that they did not receive adequate support.

The median response for the Likert-scale questions was that the respondents disagreed with statements that they were not receiving adequate training or support. The remaining three questions were open-ended. The first question asked respondents to describe any of the challenges they face in their role. Three of the recurring challenges were budget concerns, staffing issues, and the emotionally taxing nature of the job. Question 38 asked the Title IX Coordinators to describe how the challenges they face might be improved by receiving additional training and support. The responses to this question varied; however, one response seemed to encapsulate most of the responses. One respondent stated, “Additional support would allow for other duties to be handled more efficiently. Training would allow me the opportunity to stay abreast of all the changes and meet the requirement that additional training must be done each year. It would also allow for better tracking of training completions for employees of the university.”

The last question asked respondents to share any additional comments or concerns they had regarding their role as Title IX Coordinator. The following is a representative sample of the responses received from the respondents. One Title IX Coordinator stated, “Lack of support and resources has made my work so challenging and given the sensitivity of the job and the many areas of exposure, I have tendered my resignation.

Training and support is (sic) paramount for success as a Title IX officer.” Another respondent stated, “This is the most demanding and challenging position I’ve had in my 14 years on campus.” Yet another respondent stated, “Getting easier as the years progress, but alos (sic) more cases and more time spent on each case with so many different issues.”

Research Question 4. The fourth and final research question looked at the relationship between Title IX Coordinators’ years of experience and the challenges faced in their current role. The data for this question came from the demographic question asking respondents to select the number of years they have served in the role of Title IX Coordinator and the responses from Research Question 3. The results of the Spearman’s rho analysis are summarized in Table 3.

Table 3

Correlation Analysis Results

Spearman’s rho Analysis		Years of Experience	Challenges (RQ3)
Years of Experience			
	Correlation Coefficient	1.000	-.243*
	Sig. (2-tailed)		.042
	N	83	71
Challenges (RQ3)			
	Correlation Coefficient	-.243	1.000
	Sig. (2-tailed)	.042	.042
	N	71	71

Note. Correlation is significant at the 0.05 level (2-tailed).

The null hypothesis for this question stated there is no relationship between the years of experience and the challenges faced by Title IX Coordinators. The alternate hypothesis stated there is an indirect relationship between the two variables. The hypothesis was tested through the computation of a Spearman’s rho correlation between

years of experience and challenges faced. The computation resulted in a p value that was less than .05, as such the relationship between the two variables was determined to be statistically significant. Having found the correlation to be statistically significant ($r_s = -.243$, $p = .042$), the null hypothesis was rejected.

Spearman's rank order correlation analysis indicated that a statistically significant relationship existed between the two variables, years of experience of respondents ($M = 4.35$, $SD = 4.42$) and the perceived challenges they face in their role as Title IX Coordinator ($M = 2.20$, $SD = .92$). The data, which are illustrated in Figure 2, showed that a negative correlation existed, $r_s = -.243$, wherein the perception of challenges by the Title IX Coordinators decreased as the number of years in the role increased.

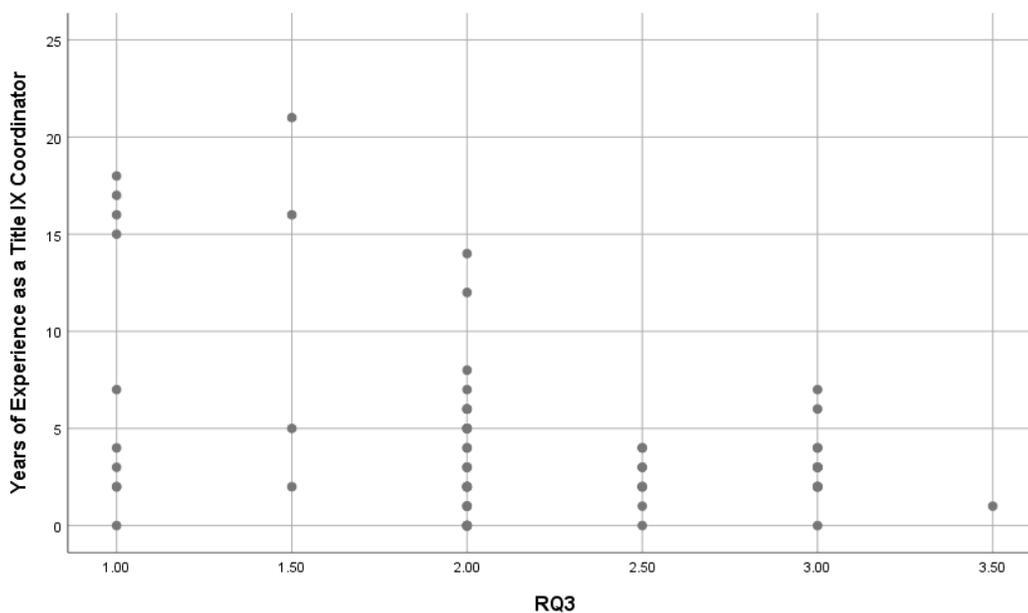


Figure 2. Relationship between years of experience and challenges faced.

Summary

The data for this study were collected from Title IX Coordinators via Survey Monkey. Research Questions 1 – 3 used descriptive statistics to determine the adequacy and sufficiency of the training and support received by the Title IX Coordinators,

specifically at Division I colleges and universities. For Research Question 1, relating to the adequacy of the support received by Title IX Coordinators, the respondents *agreed* that they felt adequately supported by their institutions. The exceptions based on the responses were in the areas of funding and office staffing.

As for Research Question 2, which dealt with the sufficiency of the training, overall the respondents *agreed* that they have received sufficient training to carry out their roles. Open-ended responses indicated that 71.1% of respondents are fully funded by their institutions to attend off-campus trainings. The data also showed that 44.6% of respondents have not attended government-sponsored training and 27.7% of respondents have attended one government-sponsored training in the last 12 months. The specific requests for additional training included programs by the U.S. Department of Education's Office of Civil Rights, training on properly conducting investigations, and additional training with local law enforcement.

The data collected for Research Question 3 showed that respondents overall do not feel that the adequacy of support and sufficiency of training received is not a challenge to them in carrying out their roles. Respondents did indicate that time, the clarity and specificity of regulations, budget concerns, staffing issues, and the emotionally taxing nature of the job are challenges they face in their roles.

Research Question 4 examined the perception of those challenges in relation to the number of years the respondent had served as Title IX Coordinator using Spearman's rho analysis. The analysis showed that there was statistically significant relationship between the perception of challenges and the number of years in the role, with the perception decreasing as the number of years increased.

Chapter 5: Discussion

Introduction

The purpose of the study was twofold: to determine (a) whether Title IX Coordinators at Division I colleges and universities are receiving adequate support and sufficient training necessary to adhere to the federal mandates regarding sexual assault on campus, and (b) how the Title IX Coordinator' years of experience relate to the challenges they face in their current role. A study conducted by Wallace (2015) surveyed more than 150,000 college students and found that nearly 25% of female college students reported experiencing some form of non-consensual sexual contact. Higher education institutions are responsible for taking "immediate and appropriate steps" when it is made aware or should "reasonably" be aware that sexual violence has occurred on campus (United States Department of Education, Office for Civil Rights, 2011b, p. 15).

This responsibility comes from the three federal regulations that govern campus safety on college campuses. Title IX specifically regulates the matter of gender discrimination, which in its most severe form includes sexual assault and sexual harassment. The authority given to colleges and universities in overseeing the investigative process is clarified by the United States Department of Education's Office for Civil Rights in the three following documents: the 2011 Dear Colleague Letter (DCL), 2014's *Questions and Answers on Title IX and Sexual Violence*, and the 2015 Dear Colleague Letter (2015 DCL).

The DCL lays out the requirements for all institutions receiving federal funds to have a Title IX Coordinator. The Coordinators are charged with coordinating their respective institutions' compliance with Title IX and ensuring that senior administration

is informed when an incident occurs that violates Title IX (United States Department of Education, Office for Civil Rights, 2011a). While Title IX Coordinators are responsible for compliance, institutions owe the Coordinators a duty to support them, provide them with “appropriate authority”, and ensure they are receiving “adequate” training (United States Department of Education, Office for Civil Rights, 2011a; United States Department of Education, Office for Civil Rights, 2015, p. 1).

Summary and Interpretation of Findings

The data for this study were collected from Title IX Coordinators via Survey Monkey. Of the 339 possible participants, there were 83 respondents. The responses for the following research questions were addressed in this study.

1. How adequate is the support Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

2. How sufficient is the training Title IX Coordinators at Division I colleges and universities receive in order to adhere to the federal mandates regarding sexual assault on campus?

3. What are the specific challenges Title IX Coordinators at Division I colleges and universities face in order to adhere to the federal mandates regarding sexual assault on campus?

4. How do Title IX Coordinators’ years of experience relate to the challenges they face in their current role? These research questions were addressed in a 37-item instrument that was sent out to Title IX Coordinators at Division I colleges and universities.

Research Questions 1 – 3 were analyzed using descriptive statistics, while Research Question 4 was analyzed using a Spearman’s rho analysis.

Research Question 1. Research Question 1 addressed a series of ways by which institutions could provide support to Title IX Coordinators. Respondents were asked their perceptions on the adequacy of that support. According to Jones (2014), the amount of time and stress related to handling sexual violence cases can be very demanding. This highlights the need for support for Title IX Coordinators as they carry out their roles. In addition, the 2015 DCL emphasized the importance of providing support for Title IX Coordinators. Part of this support is ensuring they have appropriate access and authority to handle all Title IX matters (United States Department of Education, Office for Civil Rights, 2015).

Overall, the results for RQ1 showed that respondents *agreed* that they felt adequately supported by their institutions. However, the research implied that there was a lack of support for Title IX Coordinators, in regard to the demands on their time and the importance of institutional support (Jones, 2014; United States Department of Education, Office for Civil Rights, 2011a, 2015). The results of this study support that concept, with 56.7% of respondents indicating that their offices were understaffed. In addition, Although the DCL notes the importance of Title IX Coordinators being given “appropriate authority”, in the open-ended questions, one respondent expressed frustration, stating, “All of the challenges I face stem from a lack of institutional support, at the very top levels...People have made decisions about my work without consulting me, and have reversed decisions I made by going above me to our university counsel.” Another respondent also expressed the importance of authority, stating the following:

I need to have the authority and autonomy to conduct investigations and make recommendations for action, especially in cases where employees must be disciplined or in some way encouraged to change their approach. Additionally, I need access to senior-level leaders to engage in conversations about issues on campus, as well as make necessary changes to address harassment more effectively.

It should be noted that on the Likert scale, the majority of respondents either *agreed* or *strongly agreed* that they felt they had been given “appropriate authority” as defined by the DCL. Some of the other areas respondents felt could use improvement included, but were not limited to, funding, office staffing, increased authority and autonomy, and better communication with/from senior administration.

Research Question 2. Research Question 2 dealt with the sufficiency of the training being received by the Title IX Coordinators. The United States Department of Justice, Office of Violence Against Women (2016) reported that even professionals with extensive experience often do not have training in sexual violence investigations or dealing with victims. Dealing with the effects of trauma is also an area where administrators often receive minimal training (Franklin, Taylor, & Beytagh, 2017). Perhaps for this reason, the DCL emphasizes the importance of Title IX Coordinators receiving “adequate training” (United States Department of Education, Office for Civil Rights, 2011a).

The respondents, generally, *agreed* that they have received sufficient training to carry out their roles. The majority of respondents (62.5%) have received more than 20 hours of training in the last 12 months. A limited number of respondents have attended

training by either local/state agencies (13.33%) or federal agencies (5.98%). According to Wilson (2015), higher education administrators are facing overwhelming pressure at trying to meet the standards established by the government. Yet, despite regulations being created and enforced at the federal-government level, when specifically asked about the number of government-sponsored training attended over the course of the last 12 months, the majority of the Title IX Coordinators surveyed responded that they have attended zero government-sponsored training or only one over the course of the last 12 months. One respondent stated, “I believe the federal government, through the regional OCR offices should hold training for regional campus TIX administrators on their expectations and guidance.”

For this open-ended question, respondents requested additional training programs by the U.S. Department of Education’s Office of Civil Rights, training on properly conducting investigations, additional training with local law enforcement, training on working with senior administration, training on diversity issues, and training for properly conducting interviews during trauma situations.

Research Questions 3 and 4. The data collected for Research Question 3 addressed respondents’ perceptions related to the challenges they face in their roles. According to Gala and Gross-Schaefer (2016), administrators [in the form of Title IX Coordinators] are being tasked with assuming responsibilities that historically belonged to the criminal justice system. The challenges arise because the requirements continue getting “bigger and broader” (Mangan, 2016, para. 9). Despite the research, the results indicated that respondents overall do not perceive adequacy of support and sufficiency of training as a challenge to them in their ability to carry out their roles.

In line with the research, however, one respondent stated, “The biggest challenge is when new regulations and guidelines come from the department of education, there is little insight on how to apply those regulations.” Another respondent stated, “The biggest challenges don't come from the people involved in our cases; they come from above and the lack of support I receive. It is the reason that people transition out of this work...”

More generally, in the open-ended questions, respondents stated that time, the clarity and specificity of regulations, budget concerns, staffing issues, the emotionally taxing nature of the job are challenges they face, the ability to juggle global campus concerns with individual concerns, and the ability to work cohesively with other administrative departments.

Research Question 4 examined the perception of the challenges from Research Question 3 in relation to the number of years the respondent had served as Title IX Coordinator using Spearman’s rho analysis. Of the 83 respondents, 9 have served in the role for more than 7 years. The majority of the respondents have been in the role less than 5 years. The data collected showed that a statistically significant relationship existed between the perception of challenges and the number of years the Title IX Coordinator has served in the role. The perception of challenges decreased the longer the respondent served as Title IX Coordinator.

Implications of Findings

The results of this study deviated from the researcher’s expectations based on the research, in that the majority of respondents indicated they felt they were receiving adequate support in their roles, as well as adequate training needed to carry out those roles. However, more in line with the research, there were three areas in which the

participating Title IX Coordinators expressed concerns: office staffing, lack of specificity in federal regulations, and lack of clarity in the federal regulations. These survey results are summarized in Table 4. Further research shows that these are growing areas of concern in how sexual assault is addressed on college and university campus, particularly in light of recent administration changes.

Lack of funding. The first issue, related to office staffing, is primarily a funding concern. The change in this area has to come from senior administration fully understanding the extent of the sexual assault crisis in general, but more specifically on their campuses. According to Yung (2016), a survey of college presidents found that only 32% of the 647 respondents believed that sexual assault was widespread across colleges and universities in the United States. From that same survey, just 6% of the surveyed college presidents believed that the issue of sexual assault was “prevalent” on their campus (Yung, 2016). This shows that even for the senior administrators that believe the problem exists at a national level, they do not fully accept that it is a problem that is occurring at their institution.

This same distortion of reality resulted in only 4% of the college presidents to think that improvement was needed in the way were handling sexual assault on their campuses, instead believing they were “‘doing a good job’ in protecting women” (Yung, 2016, p. 892). It is the belief of the researcher that until senior administration accepts that a problem exists, on both the macro and micro levels, there will never be substantial improvement in the way sexual assault is handled on college and university campuses. One respondent from this study summed it best when asked what additional support they would like to receive from their higher education intuition, stating, “A budget that will

actually help us bring in innovative prevention and education strategies. We need more money to pull off the requirements of Title IX in this area.”

Lack of clarity and specificity. The other concern raised in the results of this study related to the clarity and specificity of existing federal regulations, or the lack thereof. Although this study sought to gain perspective from the 347 Title IX Coordinators at Division I colleges and universities, there are 25,000 professionals tasked with coordinating compliance at secondary and post-secondary schools (Association of Title IX Administrators, n.d.). For the respondents of this survey and their peers one of the challenges in their roles is balancing the day-to-day responsibilities of the position with understanding the guidance being received from the courts, the Department of Education, and Congress – which all seem to speak different languages (Grimmett et al., 2015).

According to Pappas (2016), the most perplexing part of a Title IX Coordinator’s job stems from the ambiguity of what constitutes compliance. Pappas attributes the inconsistent application of existing regulations to this lack of clarity and specificity.

Mann (2018) asserts that another problem with the regulations is that they are a moving target, the requirements of which shift from administration to administration. Yung (2016) discusses the concept of a code that would be enforced universally at all higher education institutions, thereby ensuring the clarity and specificity needed to ensure compliance. After reviewing the results of this study, instead of more regulations, the researcher recommends universal training.

Table 4

Results of Survey Questions Related to Title IX Coordinator Concerns

Survey Questions		n	%
My Office is fully staffed to accommodate the demands of the office.	Strongly Disagree	12	14.5
	Disagree	35	42.2
	Agree	19	22.9
	Strongly Agree	10	12.0
	Missing	7	8.4
One of the challenges I face in my role is that the existing federal regulations are not specific.	Strongly Disagree	4	4.8
	Disagree	27	32.5
	Agree	29	34.9
	Strongly Agree	11	13.3
	Missing	12	14.5
One of the challenges I face in my role is that existing federal regulations are not clear.	Strongly Disagree	4	4.8
	Disagree	22	26.5
	Agree	36	43.4
	Strongly Agree	8	9.6
	Missing	13	15.7

The federal government created the three regulations intended to govern the manner in which campuses handle sexual assault; however, this study found that 30 respondents (36.1%) attended zero trainings from federal agencies. It should be noted that only 46 respondents answered this question. This means that the majority of respondents have not received any training from those that can most clearly clarify the regulations. A

qualitative study conducted by Moylan (2016) found that campus-based victim advocates wanted “government and regulating bodies to be more involved in sharing best practices with campuses” (p. 1129). The researcher believes that the implementation of mandatory training sessions by the appropriate federal agencies would assist in clarifying the regulations and likely lead to more consistent implementation across colleges and universities. The ideal is that through consistent implementation students will be encouraged to report occurrences of sexual assault on campus at higher rates, thus creating a better understanding of the actual landscape of sexual violence on campus. With this knowledge in hand, Title IX Coordinators and senior administration could work together to make informed prevention plans.

Limitations of the Study

For this study, the researcher created an original instrument to be sent out to the Title IX Coordinators. Despite having Title IX Coordinators assist in piloting the survey, one of the limitations of this study was the ability of the researcher to fully cover all the training and support issues that Title IX Coordinators face. This limitation is the result of the researcher’s lack of direct knowledge of the day-to-day practices of Title IX Coordinators. While the researcher worked in higher education, specifically student services, hands-on experience in Title IX and related regulations was limited.

The second limitation was based on access to potential respondents. Based on the response to the pilot study, the researcher expected a low response rate. This concern was increased because the potential participants were reduced from the approximately 350 Division I colleges and universities listed on the NCAA website to the 339 institutions for which the researcher was able to collect contact information. Some of the colleges and

universities did not have accessible information or did not provide a direct contact e-mail address, instead using contact forms that did not allow attachments. Additionally, data for this study was collected during the summer months. Apparently, this is a downtime for Title IX Coordinators. Many of the emails sent out bounced back with out of office of emails or with emails that informed the researcher that the contact was no longer with the institution. Despite several attempts to reach out to the respondents, all these issues resulted in a response rate under 25%.

Future Research Directions

The results of this study showed that the majority of respondents felt the support they are currently receiving from their institutions is adequate, as evidenced in the responses to the Likert scale questions. The open-ended questions revealed that there is a need for improved technology. One respondent requested “additional technology -- tablet computers for note taking during interviews.” Another respondent indicated a need for “[t]echnology for tracking and disposition separate from the generalized technology used by the institution.” Based on these and other open-ended responses, future study is recommended to review the effectiveness of and uses for existing technology being used by Title IX Coordinators. This study should include a cost-benefit analysis.

Additionally, Mann (2018) pointed out how requirements for compliance change as the administration in the Executive Branch changes. This is evidenced by the current changes in policy that has been proposed by current Education Secretary Betsy DeVos. The new Department of Education rules would narrow the definition of sexual assault to mean “unwelcome conduct on the basis of sex that is so severe, pervasive and objectively offensive that it denies a person access to the school's education program or activity,”

which is in opposition to the Obama administration's efforts to broaden the definition to "unwelcome conduct of a sexual nature" (Tatum, 2018, para. 5). The policy, which was proposed in November 2018 and is currently in the 60-day period of public comment, would also require schools to have a presumption of innocence throughout the process, as well as allow the right to cross-examination of the victim (Tatum, 2018). When asked to share any additional comments/concerns regarding their role as Title IX Coordinator, one of the respondents of this study stated, "Despite the chaos at the federal level, it is important for campuses to stay consistent with the initiatives from the Obama administration." Based on this concern, and in light of the proposed changes, the researcher recommends further study on the percentage of student reports of sexual violence during the Obama Administration as compared to the current administration. Particularly, in the climate of #MeToo and TIMES UP, it would be interesting to see if the movements to raise awareness and encourage victims to break their silence at the national level have made it to the college and university level.

References

- Allen, C.T., Ridgeway, R., & Swan, S.C. (2015). College students' beliefs regarding help seeking for male and female sexual assault survivors: Even less support for male survivors. *Journal of Aggression, Maltreatment, and Trauma*, 24(1), 102 – 115.
- American Council on Education. (2014). New requirements imposed by the Violence Against Women Reauthorization Act. Retrieved from <http://www.acenet.edu/news-room/Documents/VAWA-Summary.pdf>
- Anderson, P.M. (2012). Title IX at forty: An introduction and historical review of forty legal developments that gender equity law. *Marquette Sports Law Review*, 22(2), 325 – 393.
- Aronowitz, T. (2014). College health's response to "Not Alone". *Journal of American College Health*, 62(6), 357 – 359.
- Association of Title IX Administrators. (n.d.). About ATIXA. Retrieved from <https://atixa.org/about/>.
- Bandura, A. (1977). Self-efficacy: Toward a unifying theory of behavioral change. *Psychological Review*, 84(2), 191 – 215.
- Beggs, A. & Walker, I. (2013). Policy brief: Domestic violence and the Violence Against Women Act. *Edgar Dyer Institute for Leadership & Public Policy*, 1 – 4.
Retrieved from <https://www.coastal.edu/media/academics/collegeofhumanities/ilpp/policybriefs/Domestic%20Violence%20and%20VAWA.pdf>
- Beyette, B. (1989, August 10). Campus crime crusade: Howard and Connie Clery lost their daughter to a crazed thief; now they're angry and fighting back. *Los Angeles*

Times. Retrieved from http://articles.latimes.com/1989-08-10/news/vw-301_1_campus-crime-statistics

Block, J.A. (2012). “Prompt and equitable” explained: How to craft a Title IX compliant sexual harassment policy and why it matters. *College Student Affairs Journal*, 30(2), 61 – 71.

Bolger, D. (2016). Gender violence costs: Schools’ financial obligations under Title IX. *The Yale Law Journal*, 125, 2106 – 2130.

Brown v. Board of Education of Topeka. (1954). 347 U.S. 483. Retrieved from <https://www.oyez.org/cases/1940-1955/347us483>

CampusClarity. (2013). *Campus Save Act*. Retrieved from <http://campussaveact.org/>

Cannon v. University of Chicago. (1979). 441 U.S. 677. (1979). Retrieved from <https://supreme.justia.com/cases/federal/us/441/677/case.html>

Cantalupo, N. C. (2011). Burying our heads in the sand: Lack of knowledge, knowledge avoidance, and the persistent problem of campus peer sexual violence. *Loyola University Chicago Law Journal*, 43, 205 – 266.

Cantalupo, N.C. (2012). “Decriminalizing” campus institutional responses to peer sexual violence. *Journal of College and University Law*, 38(3), 481 – 524.

Cantwell, P. J. (2008). In *Encyclopedia of Survey Research Methods*. (Vol. 1, pp. 90 – 93). Retrieved from <http://dx.doi.org/10.4135/9781412963947.n61>

Chang, E.C., Yu, T., Jilani, Z., Fowler, E.E., Yu, E.A., & Lin, J. (2015). Hope under assault: Understanding the impact of sexual assault on the relation between hope and suicidal risk in college students. *Journal of Social and Clinical Psychology*, 34(3), 221 – 238.

- Clery Center for Security on Campus. (n.d.) *Our history*. Retrieved from <http://clerycenter.org/our-history>
- Creswell, J. (2015). *Educational Research: Planning, conducting, and evaluating quantitative and qualitative research* (5th ed.). Upper Saddle River, NJ: Pearson.
- Davis v. Monroe County Board of Education. 526 U.S. 629. (1999). Retrieve from <https://www.oyez.org/cases/1998/97-843>.
- Downing-Matibag, T. M. & Geisinger, B. (2009). Hooking up and sexual risk taking among college students: A health belief model perspective. *Qualitative Health Research, 19*(9), 1196 – 1209.
- Duncan, S.H. (2014). The devil is in the details: Will the Campus SaVE Act provide more or less protection to victims of campus assaults? *Journal of College and University Law, 40*(30), 443 – 466.
- Dungy, G. & Gordon, S. (n.d.). The development of student affairs. In J. H. Schuh, S. R. Jones, S. R. Harper, & Associates (Eds.), *Student services: A handbook for the profession* (5th ed.) (pp.61 – 79). San Francisco, CA: Jossey-Bass.
- Dunn, L. L. (2014). Addressing sexual violence in higher education: Ensuring compliance with the Clery Act, Title IX, and VAWA. *The Georgetown Journal of Gender and the Law, 15*, 563 – 584.
- Edwards, S. (2015). The case in favor of OCR's tougher Title IX policies: Pushing back against the pushback. *Duke Journal of Gender Law & Policy, 23*(1), 121 – 144.
- Eisenberg, D., Hunt, J., & Speer, N. (2012). Help seeking for mental health on college campuses: Review of evidence and next steps for research and practice. *Harvard Review of Psychiatry, 20*(4), 222 – 232.

- Fisher, B.S., Daigle, L.E., & Cullen, F.T. (2010). *Unsafe in the ivory tower: The sexual victimization of college women*. Thousand Oaks, CA: Sage.
- Franklin, T.J., Taylor, D.C., & Beytagh, A. (2017). Addressing conflicts of interest in the context of campus sexual violence. *Brigham Young University Education & Law Journal, 1*, 1 – 57.
- Franklin v. Gwinnett County Public Schools. (1992). 503 U.S. 60. Retrieved from <https://www.oyez.org/cases/1991/90-918>
- Gala, S. & Gross-Schaefer, A. (2016). Sexual assault: The crisis that blindsided higher education. *International Journal of Social Science Studies, 4*(8), 23 – 41.
- Gebser v. Lago Vista Independent School District. (1998). 524 U.S. 274. Retrieved from <https://www.oyez.org/cases/1997/96-1866>.
- Grimmett, J., Lewis, W.S., Schuster, S.K., Sokolow, B.A., Swinton, D.C., & Van Brunt, B. (2015). *The challenge of Title IX responses to campus relationship and intimate partner violence* [White paper]. Retrieved from <https://atixa.org/wordpress/wp-content/uploads/2012/01/Challenge-of-TIX-with-Author-Photos.pdf>
- Hartmann, A. (2015). Reworking sexual assault response on university campuses: Creating a rights-based empowerment model to minimize institutional liability. *Washington University Journal of Law & Policy, 48*(1), 287 – 320.
- Henrick, S. (2013). A hostile environment for student defendants: Title IX and sexual assault on college campuses. *Northern Kentucky Law Review, 40*(1), 49 – 92.

- Holland, K.J. & Cortina, L.M. (2017). "It happens to girls all the time": Examining sexual assault survivors' reasons for not using campus supports. *American Journal of Community Psychology*, 59(1 – 2), 50 – 64.
- Huck, S. W. (2012). *Reading statistics and research* (6th ed.). Boston: Pearson Education Inc.
- James, V.J. & Lee, D.R. (2015). Through the looking glass: Exploring how college students' perceptions of the police influence sexual assault victimization reporting. *Journal of Interpersonal Violence*, 30(14), 2447 – 2469.
- Jones, D.L. (2014). Collateral damage related to rape and interpersonal violence in higher education. *Journal of College Student Psychotherapy*, 28(3), 174 – 176.
- Jordan, C.E., Combs, J.L., Smith, G.T. (2014). An exploration of sexual victimization and academic performance among college women. *Trauma, Violence, & Abuse*, 15(3), 191 – 200.
- Kim, H., Ahn, J., & No, J. (2012). Applying the Health Belief Model to college students' health behavior. *Nutrition Research and Practice*, 6(6), 551 – 558.
- Kingkade, T. (2014). How a Title IX harassment case at Yale in 1980 set the stage for today's sexual assault activism. *The Huffington Post*. Retrieved from http://www.huffingtonpost.com/2014/06/10/title-ix-yale-catherine-mackinnon_n_5462140.html
- Lin, P., Simoni, J.M., & Zemon, V. (2005). The health belief model, sexual behaviors, and HIV risk among Taiwanese immigrants. *AIDS Education and Prevention*, 17(5), 469 – 483.

- Lindquist, C.H., Barrick, K., Krebs, C., Crosby, C.M., Lockard, A.J., & Sanders-Phillips, K. (2013). The context and consequences of sexual assault among undergraduate women at historically black colleges and universities (HBCUs). *Journal of Interpersonal Violence, 28*(12), 2437 – 2461.
- Lund, E. M. & Thomas, K. B. (2015). Necessary but not sufficient: Sexual assault information on college and university websites. *Psychology of Women Quarterly, 39*(4), 530 – 538.
- Mangan, K. (February 19, 2016). 7 common requirements in resolving federal sex-assault inquiries. *The Chronicle of Higher Education, 62*(23), A12 – A13.
- Mann, N.M. (2018). Taming Title IX tensions. *University of Pennsylvania Journal of Constitutional Law, 20*(3), 631 – 676.
- Mengo, C. & Black, B.M. (2015). Violence victimization on a college campus: Impact on GPA and school dropout. *Journal of College Student Retention: Research, Theory, & Practice, 18*(2), 234 – 248.
- Miller, S. A., & Byers, E. S. (2009). Psychologists continuing education and training in sexuality. *Journal of Sex & Marital Therapy, 35*, 206 – 219.
- Moorman, A.M. & Osborne, B. (2016). Are institutions of higher education failing to protect students? An analysis of Title IX’s sexual violence protections and college athletics. *Marquette Sports Law Review, 26*(2), 545 – 582.
- Moylan, C.A. (2017). “I fear I’m a checkbox”: College and university victim advocates’ perspectives of campus rape reforms. *Violence Against Women, 23*(9), 1122 - 1139.

- Napolitano, J. (2014). Only yes means yes: An essay on university policies regarding sexual violence and sexual assault. *Yale Law & Policy Review*, 33(2), 387 – 402.
- National Sexual Violence Resource Center. (2015). Statistics about sexual violence. Retrieved from http://www.nsvrc.org/sites/default/files/publications_nsvrc_factsheet_media-packet_statistics-about-sexual-violence_0.pdf
- NCAA. (2017). *NCAA Division I*. Retrieved from <http://www.ncaa.org/about?division=d1>
- Pappas, B.A. (2016). Title IX Coordinators and inconsistent compliance with the laws governing campus sexual misconduct. *Tulsa Law Review*, 52(1), 121 – 165.
- Peters, T. M. (2016). *The phenomenology of investigating campus sexual violence* (Doctoral dissertation). Retrieved from ProQuest. (AAT 10141368)
- Potter, S. J., Edwards, K.M., Banyard, V.L., Stapleton, J.G., Demers, J.M., & Moynihan, M.M. (2016). Conveying campus sexual misconduct policy information to college and university students: Results from a 7-campus study. *Journal of American College Health*, 64(6), 438 – 447.
- Rammell, N. (2014). Title IX and the Dear Colleague Letter: An ounce of prevention is worth a pound of cure. *Brigham Young University Education and Law Journal*, 2014(1), 135 – 149.
- Richards, T.N. (2016). An updated review of institutions of higher education's responses to sexual assault: Results from a nationally representative sample. *Journal of Interpersonal Violence*, 1 – 30. <https://doi.org/10.1177/0886260516658757>
- Ricketts, G.M. (2015). The tyranny of allegations. *Academic Questions*, 28(1), 32 – 39.

- Rosenstock, I.M. (1974). Historical origins of the health belief model. *Health Education Monographs*, 2(4), 328 – 335.
- Rosenstock, I.M., Strecher, V.J., & Becker, M.H. (1988). Social learning theory and the health belief model. *Health Education Quarterly*, 15(2), 175 – 183.
- Sabina, C. & Ho, L.Y. (2014). Campus and college victim responses to sexual assault and dating violence: Disclosure, service utilization, and service provision. *Trauma, Violence, and Abuse*, 15(3), 201 – 226.
- Sacco, L. N. (2015). *The Violence Against Women Act: Overview, legislation, and federal funding* (CRS Report No. R42499). Retrieved from Congressional Research Service website: <https://fas.org/sgp/crs/misc/R42499.pdf>
- Safko, E. D. (2016). Are campus sexual assault tribunals fair? The need for judicial review and additional due process protections in light of new case law. *Fordham Law Review*, 84(5), 2289 – 2333.
- Schwartz, R., McMahon, S., & Broadnax, J. (2015). A review of sexual assault information on college web sites. *Health & Social Work*, 40(4), 275 – 282.
- Sinozich, S. & Langton, L. (2014). *Rape and sexual assault victimization among college-age females, 1995 – 2013*. Retrieved from the Bureau of Justice Statistics website: <https://www.bjs.gov/content/pub/pdf/rsavcaf9513.pdf>
- Stewart, M. (2016). The campus “rape crisis” as moral panic. *Academic Questions*, 29(2), 177 – 187.
- Stotzer, R. L. & MacCartney, D. (2016). The role of institutional factors on on-campus reported rape prevalence. *Journal of Interpersonal Violence*, 31(16), 2687 – 2707.

- Streng, T.K. & Kamimura, A. (2015). Sexual assault prevention and reporting on college campuses in the US: A review of policies and recommendations. *Journal of Education and Practice*, 6(3), 65 – 71.
- Tatum, S. (2018). *Education dept. unveils new protections for those accused of sexual misconduct on campuses*. Retrieved from <https://www.cnn.com/2018/11/16/politics/education-department-betsy-devos-sexual-misconduct/index.html>
- The Chronicle of Higher Education. (2017). Title IX: Tracking sexual assault investigations. Retrieved from <http://projects.chronicle.com/titleix/>.
- The White House. (2014). *President Obama speaks at the launch of the “It’s On Us” campaign* [video file]. Retrieved from <https://www.youtube.com/watch?v=VWzicOS0PqI>
- Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681.
- United States Department of Education, Office for Civil Rights. (2011a). *Dear colleague letter*. Retrieved from <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.html>
- United States Department of Education, Office for Civil Rights. (2011b). *Questions and answers on Title IX and sexual violence*. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf>
- United States Department of Education, Office for Civil Rights. (2014a). *Know your rights: Title IX requires your school to address sexual violence*. Retrieved from <https://www2.ed.gov/about/offices/list/ocr/docs/know-rights-201404-title-ix.pdf>

United States Department of Education, Office for Civil Rights. (2014b). *Questions and Answers on the Title IX and sexual violence*. Retrieved from

<https://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf>

United States Department of Education, Office for Civil Rights. (2015). *Dear colleague letter*. Retrieved from

<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201504-title-ix-coordinators.pdf>

United States Department of Justice, Office on Violence Against Women. (2016). *Twenty years of the Violence Against Women Act: Dispatches from the field*. Retrieved

from <https://www.justice.gov/ovw/file/866576/download>

University of California. (n.d.) *Sexual violence prevention and responses*. Retrieved from

<http://sexualviolence.universityofcalifornia.edu/faq/index.html>.

Wallace, K. (2015). *23% of women report sexual assault in college, study finds*.

Retrieved from <http://www.cnn.com/2015/09/22/health/campus-sexual-assault-new-large-survey/index.html>

Walsh, W.A., Banyard, V.L., Moynihan, M.M., Ward, S., & Cohn, E.S. (2010).

Disclosure and service use on a college campus after an unwanted sexual experience. *Journal of Trauma & Dissociation*, 11(2), 102 – 115.

White House Council on Women and Girls. (2014). Rape and sexual assault: A renewed

call to action. Retrieved from https://www.knowyourix.org/wp-content/uploads/2017/01/sexual_assault_report_1-21-14.pdf

- White House Task Force to Protect Students from Sexual Assault. (2014). *Not alone: The first report of the White House Task force to protect students from sexual assault*. Retrieved from <https://www.justice.gov/ovw/page/file/905942/download>
- Wilson, R. (August 11, 2015). Colleges under investigation for sexual assault wonder what getting it right looks like. *The Chronicle of Higher Education*. Retrieved from <http://chronicle.com.ezproxylocal.library.nova.edu/article/Colleges-Under-Investigation/232205>
- Wolitzky-Taylor, K.B., Resnick, H.S., Amstadter, A.B., McCauley, J.L., Ruggiero, K.J., & Kilpatrick, D.G. (2011). Reporting rape in a national sample of college women. *Journal of American College Health, 59*(7), 582 – 587.
- Young, C. (2015). The unsayable. *Academic Questions, 28*(1), 40 – 47.
- Yung, C.R. (2016). Is relying on Title IX a mistake? *The University of Kansas Law Review, 64*(4), 891 – 913,

Appendix
Title IX Coordinator – Training & Support Survey

Survey Respondent Demographic Information

Directions: Please tell me a little about your background.

Gender

Male _____

Female _____

Other (please specify) _____

Educational Level (Check the highest level attained)

High School or GED _____

Career or Technical Education _____

Some college credits completed _____

Associates Degree _____

Bachelors Degree _____

Masters degree _____

Educational Specialist (Ed.S.) _____

Doctoral Degree (e.g. Ph. D/Ed. D/J.D./M.D.) _____

Years of Experience as a Title IX Coordinator

(drop down list) Less than 1 year – 21 or more years

Support

Directions: Thinking about the support (resources, assistance, technology, etc.) you receive in your role as Title IX Coordinator, please indicate your level of agreement by selecting the response which best describes your attitude.

1. I receive adequate support (i.e. resources, technology, staff, etc.) from my institution to create effective sexual harassment/sexual assault policies and procedures.
 - Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree

2. My office has adequate technology to accommodate the demands of the office.
 - Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree

3. My office is fully staffed to accommodate the demands of the office.
 - Strongly Disagree

- Disagree
 - Agree
 - Strongly Agree
4. I feel other administrators (e.g. deans) fully support me in my role.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
5. I feel senior-level administrators (president, vice presidents, provosts, etc.) fully **understand** my role.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
6. I feel senior-level administrators (president, vice presidents, provosts, etc.) fully **support** me in my role.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
7. I have been given “appropriate authority” by senior-level administration to effectively carry out my role.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
8. I feel the faculty fully support me in my role.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
9. What additional support would you like to receive from your higher education institution?

Training

Directions: Thinking about the training you received, please select the response which best describes the amount and type of training you have received.

10. For the non-university sponsored training programs (off campus and webinar), approximately what percentage of funding did your university provide for you to attend?

- A. 0%
- B. 1% – 24%
- C. 25% – 49%
- D. 50%-74%
- E. 75%-99%
- F. 100%

11. How many estimated hours of training have you received relevant to your Title IX Coordinator role?

(drop down list) 0 – 51 or more

12. In the last 12 months, approximately how many off-campus training programs have you attended?

(drop down list) 0 – 11 or more

13. In the last 12 months, approximately how many government-sponsored training programs did you attend?

(drop down list) 0 – 11 or more

14. In the last 12 months, approximately how many university-sponsored training programs have you attended?

(drop down list) 0 – 11 or more

15. In the last 12 months, approximately how many external training webinars have you attended?

(drop down list) 0 – 11 or more

16. In the last 12 months, approximately how many internal training webinars have you attended?

(drop down list) 0 – 11 or more

17. I have received sufficient training on the proper standard of review.

- Strongly Disagree

- Disagree
- Agree
- Strongly Agree

18. I have received sufficient training on what constitutes consent.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

19. I have received sufficient training on the role drugs and alcohol play in the ability to consent.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

20. I have received sufficient training on interviewing victims of sexual violence.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

21. I have received sufficient training on what constitutes sexual violence.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

22. I have received sufficient training on the effects of trauma.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

23. I have received sufficient cultural awareness training to understand the impact of sexual violence on students from diverse backgrounds.

- Strongly Disagree
- Disagree

- Agree
- Strongly Agree

24. Please fill in the approximate percentage of training you have received from each of the following within the last 12 months (the amount should total 100%):

- _____ from my institution
- _____ from private sources (consultants, training firms, etc.)
- _____ from local/state agencies (e.g. law enforcement)
- _____ from federal agencies
- _____ Self-study
- _____ Other (please specify type and amount)

25. What additional training opportunities would you like to be available to help you be more successful as a Title IX Coordinator?

Challenges

Directions: Thinking about the challenges you face as a Title IX Coordinator, please indicate your level of agreement by selecting the response which best describes your attitude.

26. One of the challenges I face as Title IX Coordinator is that I did not receive sufficient training in the first three months of my position to assist me in understanding the federal regulations that I must follow.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

27. One of the challenges I face in my role is that I do not receive on-going training from my institution to create effective sexual harassment/sexual assault policies and procedures.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

28. One of the challenges I face in my role is that I need additional training on existing federal regulations related to sexual assault on campus, such as Title IX, Clery Act, etc.

- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
29. One of the challenges I face in my role is that when new regulations and updates come out that impact my role, I do not receive adequate training.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
30. One of the challenges I face in my role is that I do not have sufficient time on the job to keep up with changes in federal policies and regulations.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
31. One of the challenges I face in my role is that the existing federal regulations are not specific.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
32. One of the challenges I face in my role is that the existing federal regulations are not clear.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree
33. One of the challenges I face in my role is that I do not receive sufficient training on how to conduct investigations.
- Strongly Disagree
 - Disagree
 - Agree
 - Strongly Agree

34. One of the challenges I face in my role is that I do not receive sufficient support from the university in ensuring new policies and procedures are disseminated campus wide.

- Strongly Disagree
- Disagree
- Agree
- Strongly Agree

35. Please describe any other challenges you face in your role.

36. Please describe how the challenges you face might be improved by receiving additional training and support.

37. Please share any additional comments/concerns regarding your role as the Title IX Coordinator.