

# Title IX STEM Reviews

## Agency Reviews of Title IX Application

The application of Title IX to the fields of science and engineering is of utmost importance to U.S. innovation and competitiveness, and educational institutions that receive federal dollars should be reviewed for compliance with Title IX. Over the last three years, the federal government has stepped up its efforts to perform Title IX compliance reviews in science and engineering in response to criticisms in a 2004 report published by the U.S. Government Accountability Office. Of the four agencies looked at in the 2004 GAO report on Title IX, Education, Energy, NASA and NSF, only NASA has taken seriously its obligations to enforce Title IX in the STEM disciplines. The Department of Education has done some Title IX reviews in STEM fields, but they were quite shallow under the Bush Administration's leadership. They dealt only with the basics: whether the institution has a Title IX policy and a Title IX compliance officer, is disseminating the policy, etc. Since 2004, NSF has done only one Title IX review and Energy has done three. NASA, on the other hand, has done at least eight (two per year beginning in FY 2006).

- One of the key differences to keep in mind is that NASA has been explicitly ordered by Congress through the NASA Reauthorization Act of 2005 (and funded as well) to do at least two reviews per year.
- However, NASA's Reauthorization in 2008 did not include language to continue the reviews, but also did not discontinue them. Therefore, to date, NASA has continued with their Title IX reviews.
- NASA has set forth a number of strong criteria that it considers during each Title IX review. It looks for promising practices, as well as for areas for improvement. The reports include relevant statistics and thorough discussions of both positive and negative aspects of programs.
- The Department of Energy reviews vary widely in what they cover and how, and also lack important statistical information.
- The NSF review has more statistics; but with only one review, it is really difficult to know what NSF's plans are in terms of its reviews.
- In addition to lack of in-depth information collected over time, none of the federal agencies nor any of the institutions involved in the current Title IX reviews have disseminated the results to date.
- Thus, the effects of these reviews will likely be limited to changes within the institution or even just the specific program itself, and the goals of the reviews may be misunderstood.
- In June 2009, NASA published a document on promising practices, but it has not yet garnered widespread attention. It would be equally welcome to see a document published on recommendations for improvement, so that institutions can see the sorts of conduct (policies, procedures and practices) that inhibit the full and equal participation of women in STEM fields.
- Earlier in the year, NASA also created a web page on their Title IX compliance program, which can be found at: [http://www.hq.nasa.gov/office/codee/compliance\\_program.html](http://www.hq.nasa.gov/office/codee/compliance_program.html)

## Inter-Agency Coordination

In order to improve agency-conducted reviews and subsequent dissemination of review findings, inter-agency coordination is necessary and extremely beneficial. The Department of Justice has convened a working group to coordinate Title IX reviews among various federal agencies. However, because only NASA has really stepped up the reviews in the STEM disciplines, it is not clear how much of an impact this working group has had to date.

SWE had two speakers at the joint working group workshop on Title IX and STEM in July 2008, and it was a positive experience. The working group's plans for 2009-2010 include training for federal employees on conducting Title IX compliance reviews and a second Title IX Symposium. To date, no firm plans have materialized. More coordination is needed between federal agencies, perhaps with NASA providing more information on how it conducts its reviews and what promising practices it has found thus far.