

## **Title IX on State Education Agency (SEA) Websites<sup>1</sup>**

### **Who are Title IX Coordinators and What do they do?**

Title IX is our federal law that says, "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). The 1975 Title IX Regulations state that recipients of federal financial assistance should "designate at least one employee to coordinate its efforts to comply with and carry out Title IX responsibilities," therefore State Education Agency (SEA) coordinators can be key to the effective implementation of Title IX.

Although SEA Title IX coordinators are just one piece of this extensive network of individuals responsible for implementing Title IX, they can provide crucial leadership for other Title IX gender equity coordinators in their state. As part of their overall equity responsibilities many states have encouraged their Title IX coordinators to build networks and train and assist Title IX coordinators at the district, local school and postsecondary education levels. For more information on Title IX coordinators see [www.feminist.org/education](http://www.feminist.org/education) and especially Baulch, 2004, [www.feminist.org/education/TitleIX\\_Coordinators.pdf](http://www.feminist.org/education/TitleIX_Coordinators.pdf).

### **Why and How was this Research Conducted?**

As a 2005 spring intern working for the Education Equity program at the Feminist Majority Foundation (FMF), I followed up on a 2004 survey and previous efforts to identify all SEA Title IX coordinators as a resource for the Title IX Action Network and website<sup>2</sup>. I also did a systematic analysis of what the SEA websites contained related to Title IX.

While my project was in the end successful, it took the entire duration of my internship and much detective work to accomplish what should have been a simple task of building on and updating the previous partial list of SEA coordinators.<sup>3</sup>

Unfortunately in completing the SEA coordinators list, I found that a phone call did not always get an answer. Although not envisioned in the Title IX Regulations issued in 1975, this publicly required information should now be easily accessible to the general public on SEA websites. The Title IX Regulations do state that "The recipient shall notify all its students and employees of the name, office address and telephone number of the employee or employees" designated as being responsible for coordination and compliance with Title IX. Recipients are also required to

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<sup>1</sup> This paper was written by Jessica Walker, a 2005 summer intern at the Feminist Majority Foundation, with input and refinement by Dr. Sue Klein, Education Equity Director, Feminist Majority Foundation.

<sup>2</sup> [www.feminist.org/education](http://www.feminist.org/education)

<sup>3</sup> As of March 2005 the list was missing Title IX Coordinator information for 14 states and had out of date information for many other states.

<sup>5</sup> Search terms were: *Title IX Coordinator(s)*, *Title IX*, *Equity Coordinators*, *Gender equity*, *Sex equity*, *Section 504*, *Section 504 Coordinators*. (*More 504 information might have been found if terms such as handicap and disabilities were also used.*)

adopt and publish grievance procedures to provide for prompt and equitable resolutions of Title IX complaints.

Since it makes so much sense to provide this required public information on Title IX coordinators and policies on the websites of all recipient organizations, the Feminist Majority Education Equity Program decided that this should be an important initial goal of the Title IX Action Network. Thus, I volunteered to analyze how well states were using their websites to help their constituents learn about Title IX and find their Title IX coordinators.

In doing this analysis I decided to compare the results with similarly required coordinators who protect rights of individuals with handicapping conditions. The regulations for Section 504 of the Rehabilitation Act of 1973 require 504 coordinators in organizations that receive federal financial assistance. The responsibilities and contact information requirements for these coordinators are very similar to the Title IX coordinator requirements. The website search I conducted in May 2005 was of all U.S. state education agency websites as well as the website for the District of Columbia. Search terms were based on the most common language for Title IX coordinators and Title IX-related information as well as Section 504-related information<sup>5</sup>.

I found some Title IX coordinators listed on state education agency (SEA) websites, but other states did not make this information easily accessible. Only after countless phone calls to OCR Regional Offices<sup>6</sup>, Equity Assistance Centers, likely offices in the SEA's, emails to coordinators, exhaustive searches of other materials on SEA websites and other equity resources (such as old newsletters), and long periods of waiting for people to return my calls and emails was the list completed.<sup>7</sup>

## **Results of the Search of SEA Websites**

### **A Year's Progress**

This 2005 report relied solely on searches conducted on SEA websites, whereas the 2004 report by Feminist Majority Foundation summer intern Christina Baulch<sup>8</sup> relied on survey responses from 20 State Title IX Coordinators about their SEA websites. Information compiled by June 2005 about access to Title IX information and coordinator databases is strikingly similar to the data collected in an April 2004 survey of State Title IX coordinators by the Title IX Action Network. This indicates little progress in one year's time in providing information on Title IX on SEA websites. The 2004 surveys went to State Superintendents of Schools in all SEAs, with follow-ups to specific individuals in the SEAS who might know about the Title IX Coordinators, but only 20 surveys were received by the end of the summer 2004.

In the 2004 survey when asked if any information about Title IX was posted on their agency's website, 12 of the 20 respondents said yes and one responded that it was in development. All listed the state education website as to where the public could access this information. During

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<sup>6</sup> I was informed that OCR does not compile that type of information.

<sup>7</sup> After Jessica Walker left, CT Title IX Coordinator William Howe helped FMF Summer 2005 intern, Karissa Stotts update some of the ever changing Coordinator information using many state vocational equity Methods of Administration coordinator contacts.

<sup>8</sup> [http://www.feminist.org/education/TitleIX\\_Coordinators.pdf](http://www.feminist.org/education/TitleIX_Coordinators.pdf)

our May 2005 search, we found some of this information to be very limited, but some states are setting what should be the standard in providing extensive information on Title IX and Title IX coordinators. We will highlight how they serve as models after summarizing our results for all the states.

### **State TIX Coordinator Contact Information on Websites**

Only 16 states have State Title IX Coordinators clearly posted on their websites<sup>12</sup>. In many instances these names are posted in equal opportunity or nondiscrimination policy statements on the website. Other states post this information in sections of their website devoted to Title IX or gender equity or it is accessible through a search of the staff directory. Only 12 states have 504 handicapped coordinator information posted<sup>13</sup>.

The National Alliance for Partnerships in Equity (NAPE) lists state equity contacts for career and technical education at [http://www.napequity.org/nape\\_directory.htm](http://www.napequity.org/nape_directory.htm). Some of these individuals also serve as Title IX coordinators. Some states also list other equity contacts such as Civil Rights Act Title VI coordinators or diversity or equity officers. However, only Title IX and Section 504 have specific federal regulatory provisions for coordinators. Some individuals are assigned more than one of these coordinator roles. In one of its guidance documents, the U.S. Dept. of Justice suggests that it would be fine for the same person to have Section 504 and Title IX coordinator responsibilities.

### **General TIX Information on Websites**

General information about Title IX on all state education agency websites was difficult to access during the recent search. Only 20 states have Title IX-related content on their websites<sup>14</sup>, but the information provided by most states is not substantial. Many of these states only mention Title IX in nondiscrimination or equal opportunity statements<sup>15</sup>, while others link to federal sources such as the posted Title IX regulations and some also include this along with information about their own state gender equity laws. Twenty-three states have easily accessible information about Section 504 on their websites<sup>16</sup>.

### **Databases of TIX and Equity Coordinators**

When asked if they maintain an electronic database of TIX coordinators in their state during the 2004 survey, six responded with a yes, 10 said no and two stated that a list was in development. Only one gave a website from which the public could access this information, the rest were kept in personal use by Title IX state coordinator or maintained by an education consultant.

During the May 2005 review of state websites, only three states provided lists of Title IX and other equity coordinators<sup>17</sup>. However, during this investigation of SEA search engines for Title

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<sup>12</sup> AZ, CT, DC, FL, GA, IL, KS, KY, ME, MI, NV, NC, WA, UT, WV, WY

<sup>13</sup> FL, GA, HI, KS, LA, ME, MS, NE, OH, RI, UT, WY

<sup>14</sup> AK, AZ, CA, CT, DC, FL, GA, IL, KY, MA, ME, MI, MT, NV, NJ, NY, NC, TX, WA, WI

<sup>15</sup> Statements of nondiscrimination are required in signed agreements to receive federal funds.

<sup>16</sup> AK, DE, FL, GA, HI, KY, LA, MA, ME, MI, MN, MS, MT, NE, NY, ND, OR, TN, TX, UT, VT, WI

<sup>17</sup> INSERT HERE.

IX and related information, forms were found showing that many states are collecting this information from districts and LEA's as part of annual equity compliance reports<sup>18</sup>. Some states are collecting contact information for equity coordinators as a way for districts to comply with state and federal laws prohibiting discrimination, such as Title IX or with the Methods of Administration (MOA) procedures required for the Office for Civil Rights vocational education compliance activities including in some cases on-site compliance reviews. Additionally, some state Title IX coordinators keep these lists for internal use to communicate with the other Title IX coordinators in their state. Some are considering providing this information to the public.

These forms are great examples of a simple way for states to incorporate collecting this information into other necessary procedures. The next step would be to compile and provide this information to the general public, either by creating a searchable database like Florida or simply making a .pdf file of the information like Georgia.

### **State Websites that serve as models for providing Title IX Coordinator Information**

A few states are providing easily accessible information about Title IX, Title IX state coordinators, and important related information on gender equity and civil rights.

Florida, for example, has a searchable directory of equity coordinators in both school districts and community colleges along with general information about Title IX on the Office of Equity and Access webpage<sup>19</sup>.

Georgia has a pdf file of equity coordinators for local school systems, including coordinators for Title IX, 504, Title VI and ADA<sup>20</sup>.

Connecticut has both a district and category directory of Title IX gender equity coordinators along with information about the history, status and future roles and responsibilities of these coordinators and Title IX<sup>21</sup>. The Connecticut directory even includes coordinators for the technical high schools.

These state websites are models for other states seeking to develop sections of their websites devoted to Title IX and/or equity coordinators.

### **Another Year to Come**

This analysis has identified several states with model websites, whose lead others could and should easily follow. Judging from the number of states already collecting Title IX and other equity coordinator information, it should be easy for SEA websites to make this information

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<sup>18</sup> [http://arkedu.state.ar.us/dirmemos/static/fy0102/attachments/EQUITY\\_COMPLIANCE\\_REPORT.doc](http://arkedu.state.ar.us/dirmemos/static/fy0102/attachments/EQUITY_COMPLIANCE_REPORT.doc)  
<http://education.state.mn.us/Ed0019907/index.do>  
<http://education.state.mn.us/content/078209.pdf>  
<http://www.k12.wa.us/Equity/pubdocs/B061-04%20Atch2%20Contact%20Update%20Sheet%2004-05.doc>  
<http://www.education.ky.gov/KDE/Instructional+Resources/Closing+the+Gap/Equity/Achievement+Gap/Equity+Analysis+Performance+Descriptions+Instrument+.htm>

<sup>19</sup> <http://www.firn.edu/doe/eeop/directory/index.html>

<sup>20</sup> <http://www.doe.k12.ga.us/documents/doe/legalservices/equitycoordinators.pdf>

<sup>21</sup> [http://www.state.ct.us/sde/Equity/TitleIX/TitleIX\\_coordinators.htm](http://www.state.ct.us/sde/Equity/TitleIX/TitleIX_coordinators.htm)

available. Not only would this make important information accessible to the general public and to those who need it most, it could build on an already existing network of Title IX and equity coordinators.

Please share these suggestions with the Title IX Coordinators in your state and let the Feminist Majority Foundation know if there are changes in this list:

[http://www.feminist.org/education/NetworkCoordinators\\_state.asp#mi](http://www.feminist.org/education/NetworkCoordinators_state.asp#mi)

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