

SECTION 1 - IMPLEMENTING INSTITUTIONAL SELF-EVALUATION

Title IX of the 1972 Education Amendments is a federal law designed to prohibit sex discrimination in the admission and treatment of students by education programs and activities receiving federal financial assistance. Sex discrimination in the employment policies and practices of education programs and activities is also prohibited. Intent of the law is to eliminate sex discrimination in the programs, policies and administration of education programs and activities. It reads:

"No person in the United States shall, on 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."

The implementing regulation of Title IX was issued by the Secretary of Health, Education and Welfare in June 1975. The regulation to implement Title IX became effective July 21, 1975; it establishes the criteria to which education institutions or agencies receiving federal funds must adhere in eliminating sex discrimination from their education programs and their employment policies and practices. Provisions of the regulation are organized into four major subject categories:

General requirements for achieving compliance;

Requirements for nondiscrimination in student admissions and recruitment;

Requirements for nondiscrimination in student programs;

Requirements for nondiscrimination in employment.

The provisions which outline general requirements for achieving compliance specify five tasks which must be completed by institutions of higher education and local education agencies receiving federal funds within the first twelve months of the effective date of the regulation. These tasks include:

Notification of policy of nondiscrimination on the basis of sex and compliance with Title IX;

Designation of an employee(s) responsible for coordinating compliance efforts;

Development and implementation of a grievance procedure(s) for handling student and employee complaints alleging violations of Title IX;

Implementation of an institutional self-evaluation to assess institutional or agency policies and practices for compliance with regulation requirements and modify them where necessary to insure compliance;

Submission of assurances of compliance with every application for federal financial assistance.

Title IX Regulation, 86.3, requires that by July 21, 1976, every education institution or agency meeting federal funds must complete a self-evaluation of its compliance of Title IX:

"(c) Self-Evaluation.

Each recipient education institution shall, within one year of the effective date of this Part:

(i) Evaluate, in terms of the requirements of this Part, its current policies and practices and the effects thereof concerning admission of students, treatment of students, and employment of both

academic and non-academic personnel working in connection with the recipients education program or activities;

(ii) Modify any of these policies and practices which do not or may not meet the requirements of this part; and

(iii) Take appropriate remedial steps to eliminate the effects of any discrimination which result or may result from adherence to these policies and practices.

(d) Availability of Self-Evaluation and Related Materials.

Recipients shall maintain on file for at least three years following completion of the evaluation required under paragraph (c) of this section, and shall provide to the Director upon request, a description of any modification made pursuant to subparagraph (c) (iii) and of any remedial steps taken pursuant to subparagraph (c)(iii)."

METHODOLOGY

The process of conducting the self-evaluation and assuring full compliance with Title IX began with a review of all policy statements found in the College handbooks and publications. These policy statements were found to be in compliance and expressive of the fact that the College of William and Mary did not discriminate on the basis of sex. The President of the College designated Wesley C. Wilson, Coordinator for Affirmative Action and Equal Employment Opportunity Programs, as the responsible Title IX Coordinator for all aspects of self-evaluation, coordination and implementation.

At the beginning of the 1975-76 academic year, the President of the College and the Title IX Coordinator held an extensive briefing session for all of the institution's officers, administrators and key supervisory personnel. The purpose of the meeting was to discuss significant developments in the area of affirmative action and equal employment opportunity, the annual report and recommendation of the Affirmative Action Advisory Committee, and the strategy that would be involved in fully implementing the Title IX Regulation.

The Title IX Coordinator developed and published a Title IX Grievance Procedure. Although existing classified employee grievance procedures and faculty and staff grievance procedures were reviewed, it was felt that these did not speak sufficiently to the problems that might be encountered in the total area of Title IX and therefore, it was decided to tailor a grievance

procedure specifically to these needs. The final version of the Grievance Procedure was distributed to all heads of schools, departments, key faculty personnel, key supervisors and all officers of the College and College related agencies. Copies were made available in numbers at various strategic locations throughout the campus, such as the Campus Center, the Office of the Dean of Student Affairs and at the William and Mary Library. In addition to the above distribution sequence the Title IX Grievance Procedure was published in its entirety in the William and Mary News, which is the major College news publication.

In developing plans and procedures for conducting the self-evaluation, it was decided that certain President's advisory committees, already in being, could be used most effectively to provide the necessary expertise and indepth understanding of the various policies and procedures used to govern activities at William and Mary. The committees thus selected and tasked to review, evaluate and recommend changes, where necessary, were the Committee on Admissions Policy, Committee on Student Aid and Placement, Committee on Campus Facilities Policy and Scheduling, the Committee on Athletic Policy. The Title IX Coordinator met first with each committee chairperson to outline the requirements of Title IX and the expectations of the committee. The Coordinator and the chairperson then met with the full committee to further discuss committee actions and strategies. Most committees subdivided the work requirements and areas of evaluation into subcommittee units.

The Committee on Athletic Policy developed a questionnaire, shown in another part of this report, designed to seek information concerning the athletic activities in which most students were interested and/or participated. The questionnaire was also expected to provide information as to whether the interest in participating is in terms of single-sex sports or coed sports. Another questionnaire was designed by the Committee On Student Aid and Placement, with the purpose of evaluating whether the guidance provided to students at time of course selection and general counseling is free of sex bias. This questionnaire was produced, distributed and evaluated by the Title IX Coordinator.

Interim reports were provided to the Title IX Coordinator in January of 1976 who in turn reported the interim results to the President's Advisory Council at its February 1976 meeting. Final reports were received upon completion and at appropriate times to be incorporated into the institutional self-evaluation.

In addition to the investigations and evaluations conducted by the various committees, the Title IX Coordinator met on several occasions with the Educational Athletic Foundation to discuss approaches to dealing with the requirements for compliance in men's and women's intramural and inter-collegiate athletic programs.

Throughout the self-evaluation period, the Coordinator met with interested students, student groups and significant others in order to obtain as broad a perspective of the degree of compliance in existence and the magnitude of changes necessary.