Bridging The Gap Between Law And Practice: 
An Analysis of Title IX Implementation 
in Community Colleges

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Abstract
Few studies examine Title IX implementation at community colleges. Research about the role of governing and coordinating boards in the compliance process is even more limited. To address these gaps in the literature, staff at the South Carolina Technical College System conducted a qualitative study to explore: 1) the needs of community colleges related to the implementation of Title IX; and 2) the role of state-level administrators in assisting community colleges with the implementation process. For the purpose of this study, Title IX implementation refers to the logistical implementation of Title IX guidance and Violence Against Women Act amendments as they relate to drafting institutional procedures for adjudicating claims of sexual misconduct, responding to sex-based discrimination, and providing training and awareness resources. Data collection involved an online, random sample survey of Title IX Coordinators at community colleges in southern states. Additionally, researchers conducted semi-structured interviews with state-level staff at three community college systems in the southeast and analyzed varied print and electronic communication from a purposeful sampling of community colleges. Results support assertions that community colleges have a unique set of training needs under Title IX. Assistance from state-level administrators is critical, though the structure of this assistance varies across each state and institution in the research sample.
**Introduction**

An area of recent concern among community colleges is maintaining compliant status with the U.S. Department of Education’s Office for Civil Rights (OCR), specifically regarding Title IX of the Education Amendments of 1972. Currently, updated Title IX guidance issued by OCR and amendments to the Clery Act through Section 304 of the Violence Against Women Reauthorization Act, are requiring colleges to take an in-depth look at Title IX implementation on their campuses. Because colleges vary in size, location, and governing structure, Title IX implementation materializes contradiagnostically in a number of institutions. Such contradiestinctions are intensified by variances in college resources, interpretations of federal guidance, and the diversity of the student body. According to *The Chronicle of Higher Education’s Title IX Investigation Tracker*, approximately 3 percent of Title IX cases involving alleged sexual violence occurred at community colleges. This figure suggests that community colleges are less frequent sites of Title IX violations; that characteristics of community colleges limit allegations of sexual assault; and/or that community college Title IX violations are for other offenses of sex-based discrimination. Nonetheless, community colleges are still required to comply with these legislative requirements, with increasing pressure from stakeholders to ensure safety and equitable treatment among all members of the college community and to maintain eligibility for federal financial assistance.

This project explores implementation of Title IX legislation in the community college sector. A review of the literature presents well-documented accounts of Title IX administration at four-year institutions. The presence of campus housing, athletic programs, and more social organizations such as fraternities and sororities offers clear rationale for strategic programming related to sexual harassment and sexual violence. Moreover, the number of Title IX cases involving students at four-year institutions verifies the need for said programming. It is paradoxically unfortunate that few higher education-specific examples describe how sexual misconduct prevention and response manifests at community colleges.

The majority of research published in this area focuses on institutions in the California Community College System, the largest system of higher education in the nation. Causby (2016) assessed perceived barriers to Title IX compliance among athletic administrators in California’s two-year college system. Research found that key obstacles to compliance included the absence of clear guidelines and the lack of centralized training and support. In 2004, a study commissioned by the California Department of Education and the California Postsecondary Education Commission reported that the majority of California’s community colleges did not comply with Title IX in terms of participation and coaching within athletics programs (Beam, Faddis, and Ruzicka, 2004). Recommendations included providing more state-level assistance to schools, in addition to the evaluation of hiring practices among athletic coaches. Furthermore, Garcia (1998) studied community colleges in California and New York, and highlighted the need for higher-level support to successfully implement Title IX, especially at small, two-year institutions. Consequently, community college administrators are seeking ways to respond effectively to mandates that seem to be designed for four-year institutions.

A report from the Association for Student Conduct Administration (2015) identified factors that present unique challenges for Title IX implementation at community/technical colleges. Some of the areas identified included open access and open enrollment, diversity of the student body, and lack of primary access to all students. Open access and enrollment present challenges to Title IX implementation as a result of the variety in the student population characteristics and hesitancy “to ask applicants questions about misconduct at previously attended institutions of higher education or about prior criminal activity” (ASCA, 2015). In addition to the risk associated with relative unpredictability of campus use, open access and enrollment also mean that students enter college with various levels of academic preparedness. Such a variety requires the skillful dissemination of Title IX information in an accessible manner, regarding both disability and literacy.

Following this further, the sheer diversity of the community college student body presents unique challenges for Title IX implementation. Community colleges traditionally serve more low-income and first-generation students, as well as non-native English speakers, who “may not be as likely to file complaints, seek legal action, or advocate on their own behalf if they have been victimized” (ASCA, 2015). According to Raue and Lewis, (2011) of the 707,000 reported undergraduate students with disabilities, about half enrolled in public community/technical colleges. In as much as meeting the needs of a diverse student body presents unique challenges...
for community colleges, implementing Title IX is complicated by attention to intersectional identity. Title IX legislation covers sex-based discrimination; however, there are instances where discrimination is intersectional. Diversity with regards to race, gender, and ability present cause to examine the ways in which Title IX interacts with other civil rights legislation, and community colleges are unique sites for examining the probability of those convergences.

The aforementioned challenges are related to the people aspect of Title IX implementation and directly impact Title IX legislation from a logistical perspective. As community colleges are open access and diverse learning environments, accommodating such characteristics results in a lack of primary access to all students. While most community/technical colleges use orientation as an opportunity to disseminate Title IX information, orientation is not always mandatory. Furthermore, activities like First-Year Experience and Welcome Week do not function at community/technical colleges as they do at four-year institutions, mainly because they are not mandatory, community/technical colleges are often commuter campuses, and because most community/technical college students are enrolled part-time. According to the American Association of Community Colleges (2016), 62 percent of the students enrolled in community/technical colleges during the Fall 2014 semester attended classes part-time. Of those part-time students, 41 percent were employed full-time, and 32 percent were employed part-time. Such logistical challenges require Title IX administrators to think creatively about designing, facilitating, advertising, and evaluating Title IX training for students. In 2015, a comprehensive survey assessed Title IX practices at institutions belonging to the Association of Title IX Administrators (Van Brunt, 2015). However, community colleges represented less than a third of the respondents.

On account of the aforementioned challenges, this project explores the logistics of Title IX implementation at community colleges and the role of system-level staff therein. The study was designed to target two-year colleges solely, and to facilitate dialogue about the role of state-level support in Title IX compliance. To this end, the researchers sought to answer the following questions:

1. What do Title IX administrators at community/technical colleges in southern states identify as challenges to Title IX implementation?
2. What training needs are specific to community college administrators and staff in southern states as they relate to Title IX implementation?
3. What is the role of system-level staff and their respective boards at two-year college systems in southern states as it relates to Title IX implementation?

Methodology
A mixed-method research design was used to collect data for this study. Specifically, researchers conducted a three-part analysis, targeting Title IX implementation practices in the Southeast region of the United States.

Participants
All participants in the study were employees at institutions that are accredited by the Southern Association for Colleges and Schools Commission on Colleges (SACSCOC). Due to the increasingly intersecting requirements for compliance with federal legislation and regional accreditation requirements, the researchers chose to use regional accreditation as the control variable among the target population.

As the regional accreditor, SACSCOC also classifies each accredited institution into one of four levels based on the highest degree awarded. Community colleges in the SACSCOC region may be categorized as either Level One (i.e., associate’s degree is highest award) or Level Two (i.e., bachelor’s degree is highest award). An analysis of all SACSCOC-accredited institutions listed on the organization’s website found that the majority of community colleges were accredited as Level One (SACSCOC, 2015). These findings were consistent with the core community college mission to offer an associate’s degree (Cohen and Brawer, 2003). All colleges included in the study were designated as Level One by SACSCOC.

Data Collection
Data was collected from three sites: 1) an online, random sample survey of Title IX Coordinators at community colleges in the SACSCOC region; 2) semi-structured interviews conducted via Skype and conference call with state-level staff at three community college systems in the SACSCOC region; and 3) Title IX print and electronic communication from a purposeful sampling of community colleges. Interviews were transcribed and entered into an enumerated spreadsheet for analysis.

Data Analysis
Researchers used qualitative and quantitative methods for data analysis and triangulation. A demographic analysis of the
Electronic survey respondents provided a general profile for Title IX Coordinators at community colleges in the southern region. Additionally, researchers calculated percentages to create ranking order for the types of training received and the major challenges associated with Title IX compliance.

Qualitative analysis of open-ended survey responses and interview questions, via a priori coding, served as a complement to the quantitative analysis. Codes were generalized into subcategories, including training, funding, personnel, lack of diverse training content, state-level legislation, resources, understaffing, and system-wide buy-in. These subcategories were then used to create the following categories: positive support, gaps, and challenges.

Lastly, a desktop review of print and electronic communication offered context and provided tangible evidence of Title IX implementation and compliance. Resources were examined for content, compliance, and replicability.

Results

General Profile for Community College Title IX Coordinators

The response rate for the online survey was approximately 32 percent, with a total of 72 Title IX Coordinators providing a response. Of the responses received, three were not completed entirely, making a total of 69 responses appropriate for data analysis. A demographic analysis revealed the following highlights:

- The majority (70 percent) of respondents had been in their Title IX Coordinator role for two years or less.
- Two-thirds of the respondents were female.
- Only one respondent had Title IX compliance as the sole area of responsibility.
- More than half of the respondents (54 percent) indicated that they were housed in the student affairs department on their respective campuses.
- Of those remaining, the majority of Title IX Coordinators were housed largely in human resources (23 percent), academic affairs (6 percent), and the presidents’ office (9 percent). A small percentage (4 percent) reported that their institution has a separate office to handle Title IX compliance. There was also a very small number of respondents housed in financial services or the equal employment opportunity office.

Rankings

Figure 1 (see bottom of page) illustrates the main challenges associated with Title IX compliance among the survey respondents. Time, training, and funding were identified as the top barriers to compliance and implementation. Other barriers reported were lack of institutional buy-in to promote equity on campus, and the lack of clear federal guidance.

Figure 1 Survey Responses: Main Challenges to Implementing Title IX

The need for more training was identified as the primary challenge. Additionally, the need for training was frequently referenced in the survey comments. Nevertheless, all respondents indicated receipt of some level of training, either once a year (61 percent) or more than once a year (39 percent). Figure 2 (see top of next page) provides a breakdown of the type of training received by participating Title IX Coordinators. Nearly half reported receiving customized, in-person training from a third-party vendor. Many (25 percent) indicated that their training was provided by someone from their state office.
Table 1: Implementation Challenges: Open-Ended Survey Responses and Semi-Structured Interview Responses

<table>
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<tr>
<th>Understaffing</th>
<th>Lack of Community</th>
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<tr>
<td>– It’s not that easy with our student population, so our biggest challenge with Title IX compliance has been a lack of resources to hire enough staff so the Title IX Coordinator can just be a Title IX Coordinator.</td>
<td>– I feel like a lot of our Title IX Coordinators feel like they are working in isolation and they don’t have the support of the community.</td>
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<tr>
<td>– We’re understaffed at our colleges, so what you have is a lot of Title IX Coordinators that are not just Title IX Coordinators, they’re Title IX Coordinators and HR Directors, or they’re Deans, they’re also the student affairs person, sometimes they’re the Executive Assistant to the Chancellor, you know, so we have a lot of people wearing many hats, and I don’t think they’ve gotten the training that they need, honestly.</td>
<td>– We’re dealing with a lot of the same issues and problems, and if we come together and talk about them more, then we can come up with common solutions.</td>
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<td>– Another problem we have on our campus is that we’re understaffed and that in Title IX investigations you have a Title IX Coordinator who is the judge, the jury, and the investigator, and that’s kind of a conflict of interest sometimes.</td>
<td>– The current Coordinator has too many jobs, so it takes her a while to get everything going.</td>
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<tr>
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Implementation Challenges (Table 1)

Respondents identified several Title IX implementation challenges that align with the Association for Student Conduct Administration (2015) report. In addition to challenges associated with having diverse student bodies, lack of access to resources, and working at open access/enrollment schools, respondents identified understaffing and lack of community as challenges to Title IX implementation in the community/technical college sector.

Understaffing

Understaffing as a challenge to Title IX implementation in community/technical colleges is in direct correlation to the size of the college and severity of the lack of resources. Understaffing was articulated by respondents as “a lack of resources to hire enough staff” and “we’re understaffed at our colleges.” The effects of understaffing were identified as conflicts of interest and insufficient training.
Conflict of Interest

As it related to conflict of interest, respondents stated that understaffing and lack of resources limited opportunities, wherein Title IX Coordinators “can just be a Title IX Coordinator.” Another respondent noted that, “we’re understaffed at our colleges, so what you have is a lot of Title IX Coordinators that are not just Title IX Coordinators, they’re Title IX Coordinators and HR Directors, or they’re Deans, they’re also the student affairs person.” Multiple job duties present situations in which Title IX Coordinators are required to prioritize their responsibilities, often to the neglect of Title IX, until times of crisis. Although equity and compliance may be of concern to community/technical college Title IX administrators, challenges associated with enrollment and completion often take precedence.

So, when crises occur, Title IX Coordinators’ lack of preparedness — albeit explicable — reveal themselves. As one respondent noted, “the current [Title IX] Coordinator has too many jobs, so it takes her a while to get everything going.” Title IX requires that colleges respond to allegations of sexual harassment and sexual violence promptly and equitably. Specifically, the “Dear Colleague Letter” (2011) on addressing sexual harassment/violence stated that Title IX requires “schools...to take immediate and effective steps to end sexual harassment and sexual violence” (p. 2). Admission that “it takes her a while to get things going” opens the door for concerns about the college’s ability to respond promptly and equitably to allegations of sexual misconduct. Furthermore, it suggests that attention to Title IX concerns will leave other areas of professional responsibility neglected. Situations in which Title IX Coordinators are tasked with negotiating conflicts of interest with federal compliance and institutional needs have a great potential to be lose-lose scenarios for both the colleges and students.

In some cases, the conflict of interest is exactly as articulated in OCR’s guidance. According to the “Dear Colleague Letter” (2015) on Title IX Coordinators, “Title IX Coordinators should not have other job responsibilities that may create a conflict of interest, for example, serving as the Title IX Coordinator and a disciplinary hearing board member or general counsel” (p. 7). One respondent is clear that, “we’re understaffed and that in Title IX investigations, you have a Title IX Coordinator who is the judge, the jury, and the investigator, and that’s kind of a conflict of interest sometimes.” A Title IX Coordinator filling all of the aforementioned roles presents concerns regarding equity and therefore, increases the risks of the compliance violations applied to the college.

Insufficient Training

Further complicating the issue of professional conflicts of interest is limited time for professional development related to Title IX. Colleges are required to respond to cases of sexual harassment and sexual violence promptly and equitably. Such a task is potentially ineffective when Title IX Coordinators do not have the proper training. One respondent explained, “We have a lot of people wearing many hats, and I don’t think they’ve gotten the training that they need, honestly.” In this way, understaffing impacts Title IX implementation, as Title IX Coordinators share the responsibility of ensuring their college’s compliance with Title IX’s administrative requirements, assisting with the development of methodologies for surveying school climates, and providing training and technical assistance related to Title IX to all members of the college community.

Such requirements are not only difficult tasks, but they are time-intensive as well. The lack of personnel to complete such tasks is an issue. The lack of training among designated personnel is an even greater issue. The following section addresses specific training needs identified by Title IX Coordinators.

Specific Training Needs (Table 2)

Community/technical college Title IX administrators did not identify training needs unique to community/technical college students. While some community/technical college administrators critiqued Title IX trainings for being four-year specific, these critiques were often a result of facilitators relying on examples specific to four-year colleges. Thus, trainings that address the unique characteristics of community/technical colleges are desirable; however, the training subjects are quite similar. (See next page, top left.)

LGBTQ Awareness

According to the respondents, specific training needs identified related to LGBTQ awareness, risk management, and investigation training. As guidance related to transgender students continues to circulate and the overall landscape of LGBTQ rights movements continue to show up on college campuses, higher education professionals are coming into increasing contact with LGBTQ concerns. These issues are not specific to any type of institution; however,
Table 2: Training Needs: Open-Ended Survey Responses and Semi-Structured Interview Responses

<table>
<thead>
<tr>
<th>Safe Zone (LGBTQ Awareness)</th>
<th>– We will also offer some safety zone training with all of the colleges.</th>
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<tr>
<td>Risk Management</td>
<td>– My role is to make sure all of the colleges have up-to-date training; they know how to work with the cases that they get; and all students are aware what is available to them as far as harassment, equity claims, and where to go with that; and all of their literature; the things they put on their website; [and] remind them and make sure that they have the equity and equal opportunity statement everywhere it needs to be.</td>
</tr>
<tr>
<td>Investigation</td>
<td>– Some of the topics I've been asked about have been investigations [and] Title IX, and I won’t go into the other parts because I know you’re here for Title IX, but I’ve had a lot of questions on how to do an investigation, so we will be doing training on that.</td>
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the diversity of community/technical college student bodies, faculty, and staff may have an impact on LGBTQ awareness. For these reasons, one respondent mentioned plans to “offer some safety zone training.” Such offerings strengthen Title IX implementation on college campuses.

**Risk Management**

In addition to offering of supplemental trainings, Title IX Coordinators are required to assist sub-recipients with the administrative duties of Title IX. As a result, risk management is a major part of Title IX Coordinators’ responsibilities. One respondent noted that at the system level, Title IX Coordinators must work with institutional-level Title IX Coordinators to “make sure all of the colleges have up-to-date training; they know how to work with the cases that they get; and all students are aware what is available to them as far as harassment, equity claims, and where to go with that; and all of their literature; the things they put on their website; [and] remind them and make sure that they have the equity and equal opportunity statement everywhere it needs to be.”

While such measures are mandatory, many Title IX Coordinators require technical assistance with tasks such as drafting equal opportunity statements and devising flows of responsibility, specifically when understaffing is concerned.

**Investigation**

Lastly, respondents identified investigative training as a specific training need. Because responses to Title IX must be prompt and equitable, and because they often involve traumatic experiences for the parties in a complaint, investigating cases in unbiased and effective ways can be difficult. It is certainly a task that requires intensive training and/or experience. One respondent noted having “had a lot of questions on how to do an investigation.” Access to such trainings can be limited by lack of resources and conflicts of interest. However, offering investigative trainings from a system level is one method of risk management related to Title IX sexual misconduct responses, and a way of ensuring that all entities under a sub-recipient have access to the same resources.

**Role of System-Level Staff (Table 3)**

According to the respondents in the study, the role of system-level staff is developing policy and procedure, coordinating professional development opportunities, and providing technical support to colleges in the sub-recipient universe. (See next page, top left.)

**Policy and Procedure**

Respondents most saliently identified the role of system-level leadership as approving policies and procedures related to sexual misconduct. According to one respondent, “policies and procedures go through [the] President’s Council” for approval. Other respondents discussed the development of policies and procedures as a collaborative effort between system-level leadership and system-level staff. One respondent noted, “We work here at the system office to develop [policies and procedures]; we have input from the colleges, and in order for a policy or procedure to be passed, the President’s Council does approve that before it is put into place.”

This collaborative effort is much like the example in which designated representatives partnered to come “up with a common set of definitions and then… work[ed] on requirements for prevention programing.” In this way, system-level oversight by a coordinating or governing body ensures that universal policies and procedure are developed and implemented for compliance and uniformity.

**Professional Development**

System-level staff was identified as being most effective in the role of coordinating professional development
Table 3: Role of System-Level Staff: Open–Ended Survey Responses and Semi-Structured Interview Responses

| Policy and Procedure | – From my understanding, and again I’m new at this role, but I believe the policies and procedures go through our President’s Council, so all of our presidents within our college system. |
| – So the Board of Regents kind of brought someone from each of the four systems together to come up with common definitions: what is stalking, you know, according to the law; how do we identify stalking; what is domestic violence; you know, so we came up with a common set of definitions, and then we worked on requirements for prevention programing. |
| – All of the presidents at the colleges have to approve those policies and procedures, so we work here at the system office to develop those; we have input from the colleges and in order for a policy or procedure to be passed, the President’s Council does approve that before it is put into place. |
| – I’ve written a system-wide campus policy for sexual misconduct, had that passed by our board. |
| – So I am the one that would coordinate all of the training that we have on a system level — all of our webinars, phone conferences, and questions. |
| – I think, just from a system office point of view, yes we provide training, yes we provide, you know, information to them, but my goal is that it’s useful and it’s something that is going to help them get through the day. |
| – I will be doing training, inviting all Title IX Coordinators, HR Directors, and we will go through the system-wide policy on campus sexual misconduct, but also cover how that fits into the larger structure of Title IX. |
| Technical Support | – I’m here to support our colleges and our faculty and staff, so I’m available for questions if they’re not sure about a situation. |
| – I am available for support, just a sounding board if they just want to talk a situation through, but I provide training for all of those topics. |

opportunities for Title IX Coordinators and administrators. One respondent reported coordinating questions, webinars, and phone conferences. Respondents also articulated goals of ensuring that training is useful, and as one said, that “it’s something that is going to help them get through the day.” Such trainings could be of the sort illustrated by another respondent, in which the Coordinator “will go through the system-wide policy on campus sexual misconduct, [and] also cover how that fits into the larger structure of Title IX.” In this way, system-level staff is essential to making connections between federal mandates, system-wide policies, and implementation on the local level.

Technical Support

System-level staff also provides technical support for individual colleges. Unlike professional development, technical support involves targeted, customized training to meet the specific needs of an individual institution. Technical support can take the form of simply answering questions. As one respondent suggested, “I’m available for questions if they’re not sure about a situation.” Support can also take on the form of providing advice or lending a listening, risk-management ear, as noted by another respondent’s remark: “I am available for support, just a sounding board if they just want to talk a situation through, but I provide training for all of those topics.” Technical support is therefore practical and encouraged, especially considering the fact that the role of the Title IX Coordinator is so demanding.

South Carolina Technical College System Model for Title IX Administration

Though other state systems were surveyed as part of the study, the researchers thought it was important to examine the work being done at the community colleges in their home state. The South Carolina Technical College System (SCTCS) is comprised of 16, public, two-year institutions that are located strategically across the state. Figure 3 (see below) represents the model that serves as the SCTCS Title IX policy and training implementation framework.

Figure 3: South Carolina Technical College System’s Title IX Administration Model
In many respects, the SCTCS framework includes several components of other community college systems. Policy development, training, and compliance monitoring are all initiated at the state level. However, the coordinating structure allows each college the autonomy to customize compliance activities to meet the needs of its respective service areas. Because of the differences in size and resources, it may be more difficult for smaller colleges to efficiently manage Title IX compliance. Specifically, limited resources may make it difficult to minimize issues with conflicts of interest during investigative procedures. Each one of the colleges in the SCTCS has at least one Title IX Coordinator. From this group, the SCTCS proposes to form a pool of Title IX Coordinators, Investigators, and Mediators so the system can assist with case management across the state.

Members of this pool will be called upon only in cases where conflicts of interest may exist at an individual college, to fill in gaps during times of attrition, to serve as mentors, and also to act as a resource for new Title IX Coordinators, Investigators, and Mediators. For example, if a student has a legitimate conflict of interest with the college’s Title IX Coordinator, a member of this pool would be asked to assist that college with its Title IX investigation. The process works as follows:

1. An advisory work group works with the System Office to establish the needs of the SCTCS and criteria for participating in the traveling pool.
2. The System Office forms a work group of Title IX Coordinators, Investigators, and Mediators, who meet at least twice a year to discuss Title IX-related issues. Members of this work group are asked to participate in the traveling pool.
3. The System Office takes responsible for coordinating this function between colleges based on the availability of pool members.
4. Once approved, travel expenses are reimbursed by the college making the request.
5. The System Office continuously seeks grant and other funding opportunities to support this process.

A system of this nature presents several distinct advantages, including:

- Trained Coordinators, Investigators, and Mediators are available to assist colleges in times of heightened need;
- Resources are made available for new Coordinators, Investigators, and Mediators; and
- This standing group can meet periodically to discuss Title IX-related issues or changes.

Recommendations and Discussion

The findings of this study offer several practical recommendations for practice. Primarily, an overwhelming need exists to create support networks among community college Title IX Coordinators. The development of such networks at the local, state, and regional levels will foster enhanced communication and information-sharing about issues specific to community colleges. Among electronic survey responses, the need for specific examples of Title IX implementation at community colleges ranked last in regards to the primary challenges for Title IX compliance. However, the open-ended survey responses, as well as interview responses, repeatedly included requests for resources designed for two-year institutions. Case studies, listservs, newsletters, or websites tailored to the management of Title IX at community colleges could provide great benefit to state and local administrators.

Participation in support networks may also promote the leveraging of existing resources to develop systemic solutions for Title IX compliance. The proposed pool of traveling Investigators in South Carolina offers an example of a statewide process that could benefit all institutions, particularly those with limited resources. Furthermore, many third-party training solutions are more economically feasible if purchased as part of a consortium. Several respondents pointed to the development of in-house training materials due to the lack of funding to purchase proprietary resources. Understanding what materials currently exist could substantially decrease duplication of efforts. Participation in support networks provides an opportunity for Title IX staff to discuss their college’s current training structure and type of materials used. This can help colleges more efficiently allocate resources for Title IX programs and presents opportunities for colleges to collaborate if it’s feasible to do so.

While many of the participants’ comments addressed resources for administrators, some noted the importance of creating an open dialogue with students. Respondents spoke of efforts to infuse Title IX training into registration activities, college orientation courses, and other campus activities. Each of these concepts offers opportunities to assess student needs and their overall understanding of Title IX policies. Doing so is especially important among community college students, who are
typically commuters and do not stay on campus for extended periods of time beyond their class schedules.

In addition to student involvement, other stakeholders should also participate in compliance activities. It could be appropriate, for example, to conduct joint training sessions with partnering organizations and departments such as law enforcement and four-year institutions. Based on survey responses, identified areas of training that could be beneficial to community colleges include:

- Conducting sexual misconduct investigations;
- Creating safe spaces for nonresidential students;
- Gender identity and sexual violence;
- Managing student leadership and student organizations;
- Processes for clinical sites, cooperative learning spaces, and other off-campus sites;
- Restorative justice approaches for sexual misconduct cases; and
- Training for continuing education students.

In addition to understanding more about the training needs of community colleges, this study revealed existing resources that do target Title IX administrators at two-year institutions. Areas for future research might include examining the effectiveness of such training systems. Furthermore, the study could be expanded to include community colleges in other regions and those with varying governance structures. Another area of potential interest is partnerships with senior institutions and other stakeholders.

**Conclusion**

Regardless of whether it is a two-year or four-year institution, ensuring safety on campus should be a major priority. This obligation should be people motivated, and not just because it is federally mandated by Title IX and the Clery Act. However, administrators at two-year colleges face some unique challenges implementing and operating Title IX programs. Community colleges are open-access institutions that are composed of diverse categories of students. Many of these are nontraditional students who commute to campus, work full-time jobs, attend classes part-time, and have parental responsibilities. Therefore, keeping students engaged can be a difficult task, to say the least. Conversely, four-year colleges generally have residence halls, and a wide variety of on-campus groups and organizations, which afford them more opportunities for information dissemination.

From an administrative standpoint, some community colleges are located in very rural areas, and depending on the availability of funding, campus resources can be limited and staffing levels low, with minimal training opportunities existing. This limits opportunities for those colleges to engage students on Title IX-related issues. Thus, the role of governmental agencies in supporting community colleges is vital to these colleges’ ability to provide viable Title IX programs. As such, administrators and policy-makers should make concerted efforts to establish resources and networks that support the Title IX efforts of community colleges.

**Endnotes**

1. For the purpose of this study, Title IX implementation refers to the logistical implementation of Title IX guidance and VAWA amendments as it relates to the drafting of institutional Title IX procedures for adjudicating claims of sexual misconduct, responses to sex-based discrimination, and the provision of Title IX training and awareness resources.

**References**


