

[ETR](#) – a national non-profit organization committed to improving health outcomes and advancing health equity for youth, families, and communities – founded its [K12T9 Initiative](#) in 2014. ETR’s K12T9 Initiative work focuses on helping K12 districts and schools to enhance their efforts to prevent and address sexual and gender-based harassment and sexual assault.

ETR helps districts build **infrastructure**, implement science-based best **practices**, and reach and maintain **compliance** with Title IX, the federal law that prohibits discrimination based on sex in all educational programs that receive federal funding.



In this research brief, ETR explores a key element of K12 Title IX Program effectiveness – the extent to which Districts provide legally-required information about Title IX personnel, policies, and procedures to their school community.

Introduction

One of the fundamental characteristics of districts that are effective in preventing and addressing sexual and gender-based harassment and sexual assault is that they ensure that key information about their K12 Title IX program is readily available to students, families, and staff. Making this information to the school community represents a critical point of accessibility for students, families, and staff to report any allegations, access support services, and trigger investigation and remediation processes. Generally speaking, districts that make their Title IX program information easy to find on their website make it easier for school community members to understand and access their district’s resources and procedures when incidents occur. Conversely, districts that do not make their Title IX program information readily available on their website can present significant barriers to reporting and compliance.

Title IX regulations mandate that K-12 districts and schools that receive federal funding must provide certain basic information about their Title IX resources and procedures to their school community. At minimum, districts are required to provide:

1. contact information for the district’s “Title IX Coordinator” (i.e., the person at the district who is primarily responsible for investigating and responding to allegations of sexual and gender-based harassment and sexual assault in compliance with Title IX);
2. a “nondiscrimination statement” that reflects the district’s policy or policies; and
3. the district’s “grievance procedures” (i.e., the steps districts use that “provide for the prompt and equitable resolution of student and employee complaints).”

Specifically, the Title IX regulations require that K-12 districts “prominently display” the “name or title, office address, electronic mail address, and telephone number of the employee or employees designated as the Title IX Coordinator” on its website (i.e., if the district maintains a website) and in “each handbook or catalog provided to prospective and current students, their parents/guardians, employees, and any affiliated unions.” For the nondiscrimination statement, the relevant policy, and the grievance procedure, the regulations require K12 districts to similarly “notify” those same persons and “publish” the information.

Methods

To begin to assess if K-12 districts are complying with this basic element of Title IX law, ETR conducted an analysis of 100 randomly selected regular public school district websites from the 19,406 districts downloaded from the US Department of Education. Since we wanted to explore whether the overall size of a district’s student population had any effect on the availability of Title IX information, we stratified the districts into ten equal groups based on their reported student enrollment data and the randomly selected ten districts from each group. Ultimately, districts from 33 states were represented in the final random sample with student population size ranging from 123 to 34,121. Selected districts were located in cities (n=8), towns (n=25), suburbs (n=27), and rural communities (n=40).

All analyses were conducted in March of 2021 using a standardized approach to search and scan websites for the following Title IX information: (a) the Title IX Coordinator’s contact information, (b) a nondiscrimination statement, (c) relevant policy, and (d) grievance procedure using a consistent search protocol and rating scheme (Table 1).

Table 1: Search Protocol & Rating Scheme

Search Steps	Resulting Rating
a) If search function found on district’s website, entered “Title IX”, “Title IX Coordinator”, and/or “sexual harassment” until non-null results page (i.e., information or documents ¹) was provided by site.	If any of these search terms yielded a results page with relevant information/documents on the first search results page, then rated as “Very Easy to Find (Two-Click Standard)”
b) If no results provided by site from step (a), or if website search function not found, scanned banner menus for “Title IX; “Title IX Coordinator, and/or “sexual harassment” until information/document found.	If any of these scanned terms yielded a results page with relevant information/documents, then rated as “Easy to Find”
c) If (a) and (b) yielded no information or documents, scanned home page for nondiscrimination statement (i.e., fine print at bottom of site).	If a nondiscrimination statement was found on home page, and the statement included the name and contact information for a Title IX Coordinator (aka Compliance Officer), then rated the T9 Coordinator variable as “Neither Easy no Difficult to Find” . Note that statement included links to T9 information or documents.
d) If (a), (b) and (c) yielded no information or documents, used banner menu to visually search for “code of conduct”, “notifications” (aka “required notifications”), “student handbook”, and/or “parent handbook”.	If information or document found, and a search of that document yielded relevant information, then rated as “Difficult to Find” .
e) If (a), (b), (c), and (d) yielded no information or documents, used banner menu to visually search for “board policies”, “district policies”.	If information or document found, and a search of that document yielded relevant information, then rated as “Very Difficult to Find” .
f) If no information or documents found after steps (a) through (e), then stopped scan.	Rated as “Not Found”
¹ Information or documents defined as either (i) a webpage that provided relevant information, or (ii) a link to a document that contained relevant information.	

Findings

1. When searching for Title IX Coordinator contact information, we found that just 28 of the 100 districts were in compliance with the “prominent display” requirement of the law (i.e., Title IX Coordinator’s contact information was “very easy to find” on 21 sites and “easy to find” on another 7) (Table 2).

Title IX Coordinator contact information of any type was found on 56 of the 100 district websites. To put it another way, we could not find any contact information for a Title IX Coordinator on 44 of the 100 district websites we reviewed. In the 56 district websites where any Title IX Coordinator information was found, 86% included the name of the coordinator, 98% included the coordinator’s job title, 87% included the coordinator’s email address, and 93% included the coordinator’s telephone number.

Table 2: Availability of Title IX Coordinator Information

Very Easy to Find (Two Click Standard)	21%
Easy to Find	7%
Neither Easy nor Difficult to Find	7%
Difficult to Find	14%
Very Difficult to Find	7%
Not Found	44%

We also found that the size of a district’s student population was associated with availability of the information – larger districts tended to make their Title IX Coordinator’s contact information more available than smaller districts. That is, student population size was positively associated with the accessibility of Title IX Coordinator information ($T_b = .242, p = .001$).

2. A statement of nondiscrimination based on sex was found on 59 of the 100 district websites (Table 3) and was “easy to find” or “very easy to find” on 31 of the 100 sampled sites.

Table 3: Availability of Non-Discrimination Statement

Very Easy to Find (Two Click Standard)	23%
Easy to Find	8%
Neither Easy nor Difficult to Find	6%
Difficult to Find	15%
Very Difficult to Find	7%
Not Found	41%

3. Relevant policy was found on 53 of the 100 district websites (Table 4). Relevant policies were “easy to find” or “very easy to find” on just 19 of the 100 district websites.

Table 4. Availability of Relevant Policy

Very Easy to Find (Two Click Standard)	11%
Easy to Find	9%
Neither Easy nor Difficult to Find	9%
Difficult to Find	18%
Very Difficult to Find	7%
Not Found	47%

4. Title IX grievance procedures were found on 50 of the 100 district websites (Table 5). While not a regulatory requirement, we also found that just 14 of the 100 districts provided access to their grievance form on their website or in their grievance procedure documentation.

Table 5: Availability of Grievance Procedures

Very Easy to Find (Two Click Standard)	11%
Easy to Find	9%
Neither Easy nor Difficult to Find	6%
Difficult to Find	16%
Very Difficult to Find	8%
Not Found	50%

Conclusion & Discussion

Title IX regulations require that K-12 school districts “prominently display” contact information for their designated Title IX coordinator on their website. In our random sample of 100 districts, just 28% of districts were found to comply with this provision of the law.

On these sites, search terms included “Title IX Coordinator”, “Title IX”, and/or “sexual harassment”, which usually resulted in the provision of a link that took us to a page or document with the contact information. It is unclear if students and/or their parents/guardians would use the same search terms while seeking information related to reporting an incident of harassment or assault. In other cases where information was less accessible, we had to first find relevant policy and/or procedure documents and then scan those for the Title IX Coordinator’s contact information embedded in those documents.

It is important to note that the analyses were conducted by an adult professional with significant experience working in the K-12 Title IX space. It is likely that students, parents/guardians, and employees would have a more difficult time finding the information.

The results of this exploratory study underscore that there is much work to be done to make basic information available to students, their families, and the school community. We must provide immediate pathways for students, families, and staff to access Title IX staff and resources in K12. We know that survivors of sexual and/or gender-based harassment and sexual assault can be reluctant

to report it – for fear they will not be believed, for fear of the consequences of reporting, and for a general lack of understanding about what exactly would happen if they do report their situation. If a student who has been sexually assaulted by another student or a staff member goes on their district’s website and they can’t find any information quickly they may simply give up, exasperated and further traumatized.

Some may point out that students, parents/guardians, and/or staff can easily call someone at their district and ask for the Title IX Coordinator. But that pathway may have significant consequences for the caller in terms of their confidentiality and exposure to other school staff that may or may not know how to appropriately respond to this type of inquiry. We believe that most would agree that a private and direct path to the Title IX Coordinator is an ideal standard, especially when that coordinator is well-trained and experienced.

It is also critical to point out that our pilot study focused on the *availability* of information; however, additional analysis should be conducted to examine the *accessibility* of Title IX information. For example, only a handful of districts in this sample provided descriptive information about their policy and grievance procedure that would likely be understandable by students, their families, and perhaps even employees. In most cases, information was made available in English only. Policies and procedures, also, are often written by lawyers – and while this is understandable and needed given the complexity of these legal and regulatory issues, the resulting language may be difficult for students and families to effectively interpret, and districts rarely add supplementary information to help explain processes to their stakeholders.

We recommend that districts make their Title IX Coordinator’s contact information available on their website within two clicks. That is, a person should be able to search their district’s website using common search terms and be immediately linked to a webpage that contains the essential information. In our sample, it should be noted, 81 of the 100 reviewed websites included site search functionality on their home page. But, all too often, searching for “Title IX” or “Sexual Harassment” or “Sexual Assault” yielded zero results.

Districts should also take steps to make Title IX information accessible to all members of their school community using plain language and accessible design (e.g., flowcharts, graphics, FAQs) and provide the information in languages other than English.

As an educational community, we must do better and focus on promoting the availability and accessibility of basic Title IX Information for our students, families, and staff.

ETR offers consulting services, science-based products, and downloadable resources to K12 districts and schools seeking to improve or enhance their Title IX Programs. For more information about ETR’s approach and offerings, please visit www.etr.org/K12T9.