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TITLE IX COMPLIANCE REVIEW

PRINCETON UNIVERSITY

Graduate Physics Department

Fiscal Year 2010

TITLE IX COMPLIANCE REVIEW REPORT

The Graduate Physics Department Princeton University

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TITLE IX COMPLIANCE REVIEW REPORT

The Graduate Physics Department Princeton University

I. Introduction

The Office of Civil Rights and Diversity (OCRD), United States Department of Energy (DOE or the Department), conducted a Title IX compliance review of the Graduate Physics Department at Princeton University (Princeton or the University) pursuant to Title IX of the Education Amendments of 1972 (Title IX), as amended, 20 U.S.C. Section 1681, *et seq.*, and the Department's implementing regulations, Section 10 C.F.R. 1042. This report is based on a review of records and other data provided by the University, information obtained from the University's website, and information obtained by an OCRD review team during an on-campus site visit in April 2010. During the onsite visit, the review team held interviews with graduate students and faculty of the Graduate Physics Department, the Vice Provost for the Office of Institutional Equity and Diversity, and other University administrative officials.

A. Objective

The objective of the review was two-fold: (1) to determine whether students, regardless of their gender, had equal access to opportunities and benefits offered by the Graduate Physics Department; and (2) to identify and report on promising practices for promoting gender equity.

B. Scope

The review involved an evaluation of the University's Title IX policies, procedures and practices, including the University's grievance process, as well as the role of the Title IX Coordinator in implementing and enforcing Title IX requirements. The Department also evaluated and analyzed the following programs and practices of the University, as they relate to the Graduate Physics Department: (a) recruitment and outreach; (b) admission and retention; (c) financial assistance; and (d) campus safety. In addition, the Department evaluated the academic environment, pending sexual harassment complaints, and sexual harassment training offered to students, faculty, and staff.

C. Background

DOE is the primary funding agency for basic research and development in Physics. Many of the graduate physics departments in the country's colleges and universities are recipients of DOE funding. Thousands of graduate and post-doctoral students, faculty, and principal investigators at these educational institutions are beneficiaries of Federal funding.

Title IX and DOE implementing regulations (10 C.F.R. Part 1042) prohibit discrimination on the basis of sex in any educational program or activity that receives Federal financial assistance. These laws require that the Department conduct reviews of recipient institutions to ensure that they are in compliance with the prohibition against sex discrimination.

In July 2004, the Government Accountability Office (GAO) issued a report to Congress¹ which reviewed the compliance activities of the four Federal science agencies (the Department of Energy, the Department of Education, the National Science Foundation, and the National Aeronautics and Space Administration). The GAO found that the science agencies had taken significant steps to ensure that the institutions to which they provide financial assistance are in compliance with Title IX. However, the GAO also found that women were not fully represented in those institutions.

The GAO recommended that DOE and other agencies conduct post-award monitoring of its recipients of Federal financial assistance to ensure that sex discrimination is not a factor preventing women from pursuing science degrees.

Further impetus for conducting post-award compliance reviews was provided by the passage of the America COMPETES Act, Pub. Law No. 110-69, 121 Stat. 573 (2007). The Act directs the Secretary of Energy to report to Congress on DOE's actions to implement the GAO recommendations, and to conduct, at a minimum, two compliance reviews of institutions that receive financial assistance every year.

II. The Graduate Physics Program

Princeton's Graduate Physics Department is within the Joseph Henry Laboratories on the main campus. The Graduate Physics Program is essentially a research program that leads to a Ph.D. degree. Students in the program must satisfactorily conduct research and prepare and present a thesis in a specialized area of study. Equal emphasis is placed on theoretical and experimental studies, including theoretical and experimental particle physics, gravity and cosmology, nuclear and atomic physics, mathematical physics, condensed matter physics, and biophysics. Students are expected to join research groups as early as their first year in the program.

The Ph.D. program is a five-year program. However, students continue for an additional two years to complete their dissertation if they maintain satisfactory progress in their research and if recommended by the Department.

¹ GAO Report Number 04-0639, entitled *Gender Issues: Women's Participation in the Sciences Has Increased but Agencies Need to Do More to Ensure Compliance with Title IX*.

A. Student Population

There were 103 full-time students enrolled in the Graduate Physics Program at the beginning of the 2009-2010 academic year. Part-time students are not accepted into the program. Only 12 (12%) of the 103 students were females.

Thirty-four graduate students and two post-doctoral students were interviewed during the onsite visit. This number represents thirty-four per cent of the total enrollments for academic year 2009-2010.

All twelve female students (ten graduate and two postdoctoral) were interviewed. Twenty-two male students (twenty graduate) were interviewed. Table 1, below, shows the number and percentage of full-time students, by gender, enrolled in the Graduate Physics Program from academic years 2005-2006 through 2009-2010. Princeton does not enroll part-time students.

Table 1: Graduate Physics Student Enrollment

Academic Year	Total Enrolled	Male	% Male	Female	% Female
2005-2006	91	78	86	13	14
2006-2007	106	90	85	16	15
2007-2008	106	93	88	13	12
2008-2009	111	99	89	12	11
2009-2010	103	91	88	12	12

B. Faculty and Administrators

There were forty-one faculty members in the Graduate Physics Department during the 2009-2010 academic year, as follows: twenty-five professors, four associate professors, twelve assistant professors. Thirty-eight, or 93%, of the faculty members were males. Of the three female faculty members, two were full professors and one was an assistant professor.

Eight faculty members, including the three females, were interviewed. The review team also interviewed the following eleven administrators: the Vice Provost for Institutional Equity and Diversity, the Dean of the Graduate School, the Dean of Faculty, the Chair of the Physics Department, the Dean for Research, the Director for Equal Opportunity, two Associate Deans for Academic Affairs, the Associate Dean for Student Life-Graduate, the Chair of Admissions, and the Chief for Public Safety.

The review team had an introductory meeting with the President of the University, at the beginning of the review. The team also met with the President during the exit meeting to

share comments and insight. University legal counsel was present at both the introductory and the exit meeting.

C. Recruitment and Outreach Programs

1. Office of Academic Affairs and Diversity

The Office of Academic Affairs and Diversity (OAAD) is primarily responsible for recruiting and retaining students from underrepresented population groups, which include women, in the University's science and engineering departments. The office is staffed by an Associate Dean of Academic Affairs and Diversity, a Program Coordinator, and diversity fellows who are current graduate students working on diversity issues.

The Associate Dean works with the various academic departments, including the Physics Department, to develop and implement effective strategies for recruiting and retaining underrepresented students. The Associate Dean also directs the Princeton Summer Research Program, and has responsibility for hiring and training graduate student mentors, selecting students for participation in the program, and recruiting faculty mentors.

2. Recruitment and Outreach Activities

The GAO Report and statistical studies support the finding that women are underrepresented in the graduate physics departments at universities.² Therefore, the review inquired into whether or not there is specific outreach to women. At the same time, the review looked for evidence of any disparities in the treatment of students by gender in the recruitment and outreach policies and practices of the University.

There is no specific outreach program directed at recruiting students of a specific gender to the Graduate Physics Program at Princeton. Rather, outreach activities are directed to all students. They include the Princeton Summer Undergraduate Research Experience Program and the Preview Day- Graduate Admissions Program for Prospective Students. The University also sponsors open houses which are aimed at exposing prospective students to graduate student life. Since 2008, there have been various other activities aimed at specifically engaging underrepresented groups, including prospective female students.

The following are examples of outreach events that have been sponsored by the University:

March 2008: Graduate Women in the Sciences (GWISE) hosted a conference for current and prospective women in the sciences. Admissions information was provided to prospective students.

² The American Institute of Electrical Engineering Statistical Research Center reported in 2005 that women earned only 18% of doctorate degrees in Physics.

April 2008: Princeton hosted a dinner for current and prospective graduate women of color to discuss issues related to women in the academy. Faculty and staff attended.

June 2008: Princeton participated in the National Women's Studies Association Conference. At that event, the University provided contact information and information on admissions and the various graduate programs.

September 2008: The University participated in the Graduate Women of Color Caucus Planning Meeting and Retreat to discuss issues pertaining to women.

March 2009: A delegation of NASA Women in the Sciences from South Dakota visited Princeton's Graduate School and participated in an application information session, a campus tour and departmental visits.

May 2009: Graduate Women of Color Symposium in partnership with the OAAD hosted a symposium on women of color in the academy.

November 2009: Representatives for the Graduate School participated in the Twentieth Annual California Forums for Diversity in Graduate Education. They provided prospective students with information about the University's graduate programs and admissions policies and practices, and contact information for the University.

Other outreach events include a visit to Vassar College (September 2008); a visit to Bennett College for Women (November 2008); a meeting of Sister Circle with prospective graduate women of color (November 2008); open houses sponsored by OAAD (September 2008 and October 2008); attendance at the Annual Graduate and Professional School Fair in Washington, D. C. (September 2008).

a. Princeton Summer Undergraduate Research Experience Program

The Princeton Summer Undergraduate Research Experience Program (PSURE) is a summer program in which undergraduate students perform independent research and prepare for admission to the doctoral program. The purpose of the program is to motivate and prepare undergraduate students who have been selected to participate in the PSURE program to make competitive applications to research doctoral programs. The program is open to all qualified applicants. Underrepresented groups are encouraged to apply. Faculty members and graduate students serve as mentors. The student works with a Princeton faculty member as a research assistant in a laboratory or edits and writes research papers. Participation in the program is a full-time commitment of 40 hours per week. At the conclusion of the program, students are expected to present a paper and make an oral presentation.

b. Preview Day-Graduate Admissions Program for Prospective Students

This activity brings together students from all over the country to gain first-hand experience of campus life at Princeton.

c. Feedback from Student Interviews

Most of the students who were interviewed had no awareness of any outreach activity of the Physics Department. Only two students were vaguely aware of any outreach activity. Some students recalled that faculty members visited high schools to discuss their research. Most of the students said that they attended the University's open house events. None of the students said they were recruited by the University. Rather, they said they were attracted to the University because of its reputation for having an outstanding graduate physics program.

Finding

We find no evidence of discrimination in the outreach and recruitment practices of the University. Therefore, the University is in compliance with Title IX and DOE implementing regulations with respect to its outreach and recruitment practices.

Recommendation

While we find no evidence of a Title IX violation with respect to the University's outreach practices, we note that the Graduate Physics Department has not been participating in outreach efforts in any meaningful way inasmuch as most of the students who were interviewed could not recall any outreach effort that was extended to them by the Department. We, therefore, recommend that the University evaluate the effectiveness of its current outreach programs.

D. Admissions

1. Policy on Admission to the Graduate School

Generally, all students who are offered admission to the Graduate School's doctoral programs must complete their undergraduate study in a subject closely related to the Ph.D. program for which they are applying. A prospective graduate student must also have a strong academic record. A master's degree is not a prerequisite for admissions into a doctoral program. All students enter as first year students. If the student has a master's degree that course work may count toward the pre-general or general requirements of the doctoral program. A student who already has a doctoral degree in the same or a closely related field for which the student seeks admission will not be admitted into that program.

2. Diversity Policy on Admissions

The Graduate School believes that advanced research, scholarship and teaching are strongest when informed by the diversity of viewpoints, backgrounds and experiences of its students. For this reason, the Graduate School recruits students from diverse backgrounds and strives to create an environment that is friendly to all races, to both men

and women, and to individuals of diverse sexual orientations. The Graduate School encourages departments to consider these extra dimensions while considering the overall academic strength of the individual applicant, in order to achieve diversity in their graduate student body. Diversity is recognized as having many dimensions such as nationality, ethnicity, race, gender, socio-economic background, life experiences, and intellectual achievements and promise. It is the policy of the Graduate School, in accordance with Princeton's express institutional goals, to focus efforts on the recruitment, admission, and retention of those underrepresented in the physical and mathematical sciences and in engineering, including women.

The Associate Dean for Academic Affairs and Diversity is responsible for reviewing applicant files to identify promising candidates and to bring them to the attention of the various departments. The Associate Dean also serves as an advocate for diversity, as the stated goal of the OAAD is to facilitate the enrollment, retention and graduation of a qualified and diverse student body.

All applicants are ranked on the basis of academic merit. In addition, the Diversity Office will send each department a list of students who demonstrate intellectual promise and academic ability, and who have self-identified as a member of an underrepresented group, and encourage the departmental admissions committee to give the applicant's file a thorough review.

3. Physics Department Graduate Student Admissions Process and Requirements

a. Admissions Process

All applications to the graduate schools, including the Graduate Physics Department, must be submitted electronically. Application requirements include the completion of an online application form, submission of letters of recommendation, a statement of academic purpose, and the results of the General and Advanced Physics Test (GRE). In addition, applicants are required to select either experiment or theory sub-plans. Personal interviews are not required. The application deadline for admission to the Graduate Physics Program is the 15th day of December preceding the academic year of intended attendance.

The Admission Committee is comprised of eight faculty members. They meet, before the winter break, with the department's administrators to discuss objectives and procedures. Applications are divided alphabetically. A team of two faculty members reads each application. After the first reading, applicants are ranked by the two-member team. A final discussion is held with all committee members to finalize the admit list. The Admissions Committee Chair then submits the list to the Dean of the Graduate School in February. It is the Graduate School that determines the number of students to be admitted. After that decision is made, offers of admission are sent to accepted.

The Admissions Committee considers GRE scores, although there is no minimum score for offering admission. However, documents submitted by the University pursuant to DOE’s Data Request states that students who are admitted score highly on the GRE Physics exam, and that research experience is highly valued, and of special interest to the Admissions Committee. For experimentalists, lab experience is considered important, and applicants are encouraged to discuss this in their application. Computer skills are considered a valuable asset as well. The Physics Department also assesses an applicant’s “promise” as a research scientist. Information is also gathered to assess the applicant’s interest in, and potential for, advanced research in physics.

Faculty members, and past and present committee members, stated that admissions decisions are greatly influenced by letters of recommendation. In this regard, they said that a strong letter of recommendation from an academic who is familiar with a student’s work carries the greatest weight in the decision to offer admission.

The Admissions Committee Chair stated that the department receives approximately 500 applications each year, but that offers of admission were made to only approximately 50 applicants. In explaining how the selection process works, the Chair said that applications are divided among the members of the Admission Committee who select approximately 100 for consideration. All 100 applications are then read by each member of the Committee. The Chair noted that all female and minority applications are read and given a thorough review.

4. Statistics on Admissions

Graduate Physics Department Admissions Data

The admission data in the tables is extracted from information provided by the University pursuant to DOE’s Data Request:

Table 2A: Admissions Data
Academic Year 2005-2006

	Men	Women	Total
Number of Applicants	340	64	404
Number Offered Admission	42	9	51
Number Accepted	12	1	13

Table 2B: Admissions Data
Academic Year 2006-2007

	Men	Women	Total
Number of Applicants	370	69	439
Number Offered Admission	47	12	59
Number Accepted	20	4	24

Table 2C: Admissions Data
Academic Year 2007-2008

	Men	Women	Total
Number of Applicants	384	58	442
Number Offered Admission	40	11	51
Number Accepted	20	1	21

Table 2D: Admissions Data
Academic Year 2008-2009

	Men	Women	Total
Number of Applicants	358	60	418
Number Offered Admission	48	8	56
Number Accepted	24	3	27

**Table 2E: Admissions Data
Academic Year 2009-2010**

	Men	Women	Total
Number of Applicants	351	61	412
Number Offered Admission	35	9	44
Number Accepted	10	3	13

Since 2005, the acceptance rate for female students has ranged from two percentage points to nine percentage points higher than the acceptance rate of males, except for academic year 2007-2008, when the percentage rate (13%) was the same for both males and females. In academic year 2007-2008, the percentage rate of acceptance for females was nine % higher than for males. For each of the academic years, 2005-2006 through 2009-2010, males represented 82%, 80%, 78%, 86%, and 80%, respectively, of the applicants who were offered admission. This disparity is due to the fact that there were significantly larger numbers of male applicants than female applicants in each of the five academic periods.

Faculty and administrators who were interviewed were asked how they account for the low number of females in the Graduate Physics Program. Some shared their observations. One faculty member stated that Princeton was competing for the same small pool of female applicants as other universities. Another expressed the view that physics research creates an environment that may be unappealing to females. This faculty member observed that the study of physics is isolating and lacking in social interactions. Several interviewees attributed the cause of the low numbers to social and cultural factors that contribute to “leakage” at the undergraduate level.

Finding

Although the University ensured that all applications from female and minority applicants were reviewed, we do not find this to be evidence of disparate treatment. Rather, we find that the policy is consistent with the University’s goal of including diversity as an important criterion in its admissions decisions. In making this finding, we note that the academic strength of each applicant weighted heavily in the selection process, and was a determining factor in the Admissions Committee’s decisions.

While the number of female applicants who have been admitted over the years has been quite small in comparison to the number of males who gained admission, there is no evidence that this resulted from disparate treatment. This phenomenon is clearly attributable to the low number of female applicants. None of the students, male or female, felt they were subjected to disparate treatment or discrimination in the admissions process. We, therefore, find that the University is in compliance with Title IX and DOE implementing regulations with regard to the admissions process.

E. Reenrollment, Readmission, and Drop-out

The Associate Dean of OAAD has responsibility for a number of retention efforts which include working with faculty to retain students. Special efforts are also made to recruit and retain a diverse student body. These efforts are coordinating through the Office of the Vice President of Student Life. During the reenrollment process, described below, the Associate Dean reviews the academic progress of students, discusses any problems with the Directors of Graduate Studies and with advisors, and makes recommendations for the reenrollment of students. The Associate Dean also provides counseling to individual students throughout the school year.

1. Reenrollment

Reenrollment is an annual process by which the Graduate School evaluates the academic progress of degree candidates. Every year, each student must make formal application through their departments for reenrollment. Students that have satisfied their academic requirements and demonstrated their ability to continue with their graduate work are offered reenrollment. Satisfactory progress includes completing course work and performing effectively in any assistantships or research positions.

2. Leave of Absence and Readmission

The University has implemented a leave of absence policy that is applicable to all of the Graduate Schools. Thus, there is no separate leave of absence policy for the Graduate Physics Department.

Leave may be granted up to one year for personal reasons to students in good standing, on the recommendation of the departmental director of graduate studies. The student must withdraw from the graduate program, and may not enroll in any other academic program. Upon request, the leave may be extended an additional year. If the student does not return after a two year-period of absence, the student is terminated from the program, and must formally apply for reenrollment. The student's reenrollment is decided by factors such as the student's professional suitability. A written request for reenrollment must be made by the student.

The Graduate School may place students on leave of absence if the circumstances warrant doing so. Such circumstances may include student behavior that threatens harm

to themselves or others, disruptions to the learning environment, or evidence of criminal behavior. However, the University will first attempt to persuade the student to take a voluntary leave of absence.

3. Drop-out Rate

Since 2005, a total of thirteen students, ten men and three women, have left the Graduate Physics Program. More males have dropped out of the program than females over the years, as would be expected, because of their larger number of students in the program.

Table 3 below, shows the number of students, by gender and academic year, who did not complete the Ph.D. program.

Table 3: Drop-out Data

Academic Year	Men	Women	Total
2005-2006	3	1	4
2006-2007	3	0	3
2007-2008	1	2	3
2008-2009	3	0	3

Finding

The reenrollment, readmission, and leave of absence policies of the University are facially neutral. There is no evidence of any disparities in their application to either males or females. We, therefore, find the University to be in compliance with Title IX and DOE implementing regulations.

Promising Practice

The University's reenrollment process is implemented evenly across the board. The process allows for early identification of academic deficiencies, and an opportunity to address any causes that may lead to the student's withdrawal. This may be a likely factor in the high retention rate of graduate physics students. The Department considers this a promising practice which could also be adopted by other educational institutions.

F. Financial Assistance, Incentives, and Awards

The University responded affirmatively when asked whether financial incentives were given as a means of attracting students to the Graduate Physics Program. Graduate students are provided financial support for the period of their study. All first year doctoral candidates are offered a stipend or fellowship. In academic year 2009-2010, financial support included payment of the full tuition (\$36,610 plus \$1,270 to cover the cost of a health plan fee) and a \$22,000 stipend. After the first year, it is customary for

students to be supported by teaching or research assistantships. Five of the financial incentive programs available to students in the Graduate Physics Program are described below:

Centennial Fellowships: Centennial fellowships are offered in amounts that are greater than the ordinary first year fellowships offered to students in Science, Engineering and Mathematics graduate programs.

The Joseph Henry Prizes: These awards are made in the amount of \$3000 and are offered to highly ranked students, and/or specially targeted students such as experimentalists, and American women (because they are highly underrepresented in physics doctoral programs).

The President's Fellowships: These stipends provide an extra allowance of \$3000 to students from traditionally underrepresented groups who are admitted into the doctoral program.

Summer Support: This is a guarantee of financial support offered to experimentalists.

In addition to the above-listed types of financial assistance, a prize is awarded to those students who win competitive national fellowships and then utilize them at Princeton.

Prospective and entering graduate students are also encouraged to apply for external fellowships which may be offered by the National Science Foundation, the National Aeronautics and Space Administration and the Fannie and John Hertz Foundation. Other prizes include honorific fellowships. These are offered during the final year of graduate school.

Factors considered in making financial awards include the student's ranking (described as an indication of academic merit), whether the student is an experimentalists or a theorist³ and, in the case of the President's Fellowship award, whether the student is from a traditionally underrepresented group in physics doctoral programs, such as being a woman or a racial minority.

The amount of the fellowships and prizes are set by the Graduate School. Summer support for experimentalists is set by the Office of Research and Project Administration in consultation with the Graduate Physics Department and the Graduate School.

For academic years 2005 to 2006 through the academic year 2009 to 2010 all applicants who were offered admission were also offered some amount of financial support. A majority of graduate students were offered multiple forms of financial support such as fellowships, prizes, summer support, and external grants. The data indicates that since 2005, fifteen students have been awarded the President's Fellowship. Two awardees

³ Because of Princeton's reputation for having a strong "theory" program, it has been more difficult for the institution to attract experimentalists.

were males and thirteen were females. In academic year 2009-2010, no student received the President's Fellowship award.

None of the students who were interviewed said they believed they were subjected to disparate treatment or discrimination in the award of financial assistance, or that they had knowledge of anyone who was the victim of disparate treatment or discrimination in relation to such assistance.

1. Teaching and Research Assignments

Students in the Graduate Physics Program are supported by teaching and research assistantships throughout their enrollment. Students are encouraged to join a research group in their first year. However, they are not assigned to research groups or a faculty member. Similarly, students are not assigned a research topic. It is incumbent on students to select their areas of interest and to initiate contact with a faculty who leads the research group in their particular area of interest. A faculty member may decline to serve as an advisor to a student. Once the student selects an area of interest, the student joins a research group and is then supported by research assistantship. Because research continues year round, summer support is also provided. Generally, teaching assistantships are offered only to second year students.

Students who are theorists are not placed in research groups. However, they must also initiate contact with a faculty member and work under the guidance of that faculty member in an area of discipline related to the faculty member's research interests. Theorists are required to prepare a series of papers, and ultimately a thesis on the results of their work. Because resources are greatly limited for theorists, many of them receive support through teaching and research assistantships.

Table 4 below, shows the total number of research and teaching assistantships, by gender and in percentage, awarded from academic year 2005-2006 to academic year 2009-2010.

Table 4. Teaching and Research Assistantships

Academic Year	2005-2006		2006-2007		2007-2008		2008-2009		2009-2010	
	TA	RA	TA	RA	TA	RA	TA	RA	TA	RA
Male	38	56	34	50	29	74	33	75	37	71
<i>Percentage</i>	88	87	83	86	81	87	85	90	90	88
Female	5	8	7	8	7	11	6	8	4	10
<i>Percentage</i>	12	13	17	14	19	13	15	10	10	12
Total	43	64	41	58	36	85	39	83	41	81

Students were asked to describe the process for joining specific research groups. They all indicated that they selected the group that matched their particular interest. None of the

students expressed any concerns regarding disparities in treatment with respect to the award of teaching and research assistantships.

Finding

We do not find any disparities in the manner in which financial assistance is awarded, or in how assignments are made to teaching and research assistantships. However, we note that in academic years 2005-2006, 2006-2007, 2008-2008, and 2008-2009, preference was given to female students in awarding the President's Fellowship. We note, because these awards were discontinued in the 2009 to 2010 academic year, we will not make any finding as to whether there was a Title IX violation. Nevertheless, the University is cautioned that any future award of financial assistance should be made without regard to the awardees' gender in order to avoid a Title IX violation.

Promising Practice

The generous financial support offered to graduate students frees the students from the financial burdens associated with being fulltime students, and allows the students to devote more time and effort to their academic pursuits. Many of the students who were interviewed expressed their appreciation for the support they receive from the University. This level of support contributes to attracting and retaining students who would not otherwise be able to pursue advance degrees.

G. Degree Requirements

As noted earlier, Princeton offers only a Ph.D. degree in its Graduate Physics Program. In pursuit of such a degree, students are encouraged to engage in research as soon as they enter the program. There are pre-thesis requirements, including core curriculum requirements (referred to as "the Advanced Part"). These requirements comprise "the General Examination". A student's status as a Ph.D. candidate will be revoked if the student does not successfully satisfy these requirements. In addition to pre-thesis requirements, a student must also engage in a pre-thesis project. Finally, the graduate student is required to prepare and present a thesis in the student's particular area of interest.

1. General Examination or Pre-thesis

Pre-thesis requirements include a Preliminary Examination and an Experimental Requirement, and the Advanced Part. These requirements, which are discussed below, must be completed by the end of the student's second year of study.

- a.** The Preliminary Examination comprises separate written exams in mechanics, electricity and magnetism, quantum mechanics, thermodynamics, and statistical mechanics. The exams are given in January or May of the student's first year.

- b. The Experimental Requirement comprises an experimental project and an oral examination. The experimental project is expected to be completed by May of the first year. The oral exam should be completed by October of the second year. The experimental project may be 100 hours of work done with an experimental group, laboratory work, or independent work with experimental faculty. A write-up of the student's work is also a requirement, as well as an oral presentation.
- c. **Core curriculum or Advanced Part of the General Examination.**

Students are required to pass at least three courses out of a set of core course requirements on topics in General Relativity, Condensed Matter, Atomic, High Energy, and Nuclear Physics by the end of their second year.

2. Pre-thesis Project

The Pre-thesis project is described as a research project in the student's area of interest. It consists of a written report and an oral defense before a pre-thesis committee. Students are expected to begin work on the project during their second year. The pre-thesis defense must be completed during the third year. An evaluation of the project by the pre-thesis advisor is a factor in the reenrollment process.

3. The Thesis

Students are expected to begin their thesis research by the beginning of their third year. The final public oral examination is the final requirement for the Ph.D. degree.

When the thesis is written and ready to be defended the student must place the thesis on the web for all department members to read for a period of two weeks. The Graduate Administrator must be informed that the thesis is in proper format. The student will be required to schedule the date and time of the final public oral examination and the committee members will be selected. Other requirements include: (1) obtaining the Thesis Advisor's approval form; (2) completing the Degree Application Form; (3) making a request to hold the final public oral examination; (4) preparing (a) a Reader's Report, (b) the Dissertation Report Form, and (c) an abstract and title page.

The Thesis Committee consists of a minimum of three faculty members having at least the rank of Assistant Professor, an experimentalist (if the student is a theorist), a theorist (if the student is an experimentalist), and a member who is not a physicist. No student failed to meet the requirements for advancement toward their degree for any academic year since 2005 to 2006 academic year.

Finding

We do not find any evidence of disparate treatment or discrimination in the administration of the degree requirements. Accordingly, it is our finding that the

University is in compliance with Title IX and DOE implementing regulations with respect to its degree requirement policies and practices.

III. The Environment/Climate

A. Gender Bias

None of the students who were interviewed believed that their sex had any effect on their academic experience at Princeton. Nor did the students believe that their gender was a barrier to the pursuit of their degrees or research goals. No gender-related issues in the classroom or research groups were reported.

B. Campus Safety

The reviewers questioned students and faculty on issues related to campus safety, in order to determine whether the protection provided to students was biased in favor of a particular gender. All the students said that they felt no threat to their personal safety while they are on campus. This sentiment was also voiced by the faculty. Both faculty and students said they believed that the University had made every effort to ensure that the campus provided a safe and secure environment for all members of the University community. The reviewers were given a “safety tour” and did not observe any situation or condition that would create a safety concern.

Finding

We find that that the campus is relatively safe for everyone, and that the University has taken adequate measures to ensure campus safety. Accordingly, we find that the actions taken by the University to ensure the safety of the campus and its environment are in full compliance with Title IX and DOE implementing regulations. The University is applauded for its efforts.

IV. Title IX Grievance and Complaint Policies, Processes and Procedures- Designation of Responsible Employee and Adoption of Grievance Procedures

Educational institutions that receive Federal financial assistance are required under Title IX to develop and implement nondiscriminatory policies and procedures, and to appoint an individual to coordinate and implement Title IX functions. DOE implementing regulation, 10 CFR 1042.140 (b), requires that recipients adopt and publish grievance procedures that provide for the prompt and equitable resolution of student and employee complaints of sex discrimination. It is recommended by the Department of Justice (DOJ) that the procedures provide for both formal and informal processes. Complainants should be advised of their right to file a discrimination complaint with the appropriate Federal agency if there is no satisfactory resolution of the complaint.⁴

⁴ See *Title IX Legal Manual*, U. S. Department of Justice, Civil Rights Division (Jan.11, 2001).

A. Statutory Requirements

DOE regulation 10 CFR Section 1042.13(a) provides that each recipient should designate at least one employee to coordinate its efforts for complying with and carrying out its Title IX responsibilities. A recipient education institution is also required to notify all its students and employees of the name, office address, and telephone number of the designated employee.

B. Designated Title IX Coordinator and Responsible Office

The Office of the Vice Provost for Institutional Equity and Diversity is responsible for coordinating the University's Title IX program. The Vice Provost is the designated responsible official.

The Vice Provost's Office coordinates the intake of complaints of sex discrimination and sexual harassment and is also responsible for developing and instituting the University's anti-harassment policy and related procedures, and the training of investigators and harassment resolution facilitators.

Pursuant to DOE's data request, the university provided a copy of the position description for the Vice Provost for Institutional Equity and Diversity, and for the Director for Equal Opportunity Programs. It states that the Vice Provost is responsible for implementing and developing programs designed to increase diversity and tolerance throughout the University and for overseeing the University's implementation of equal opportunity and affirmative action. The Vice Provost is also responsible for ensuring compliance with Federal nondiscrimination regulations and for implementing policies on nondiscriminatory treatment of members of the University community. Other specific responsibilities include: serving as liaison and co-collaborator with the Office of Human Resources and the Sexual Harassment and Assault Resources and Education Office (SHARE); facilitating the review and enhancement of institutional equity issues across the institution, involving internal and external constituents, facilities, teaching, research, and extracurricular activities; and overseeing investigations into complaints of harassment and discrimination.

The Director for Equal Opportunity Programs reports directly to the Vice Provost for Institutional Equity and Diversity. The Director has primary responsibility for central intake of anti harassment complaint. Other duties include: providing oversight of procedures for responding to and resolving complaints of alleged discrimination and unfair treatment; facilitating harassment resolutions; providing EEO and harassment training; assuring EEO and Affirmative Action compliance; and recommending and monitoring nondiscrimination and Title IX policy revisions.

C. Notification

Title IX provides that students must be notified of the identity and contact information of the Title IX Coordinator. Notification should be disseminated in print and by other forms of written communication. Electronic communication is also acceptable, as it is now widely used and is a highly effective medium for the dissemination of information.

The primary avenue of notification of the right to file a Title IX discrimination complaint or sexual harassment complaint is the University's handbook entitled *Rights, Rules, and Responsibilities*. According to the University, the handbook is intended to provide a concise reference to the policies that are applicable and of interest to all members of the university community. The handbook is published annually and is distributed and made available to students, faculty and staff through print and online. The office of the Graduate School distributes the handbook to all first-year graduate students. If there is a substantive change, the revised handbook is distributed to all enrolled graduate students. The handbook is also distributed annually to the faculty, including visiting faculty, and to university staff and office heads. There is no separate notification process for graduate physics students.

The handbook states that the University expects all members of the university community, as well as its visitors, to be treated equally based on merit in all aspects related to its educational programs and activities, and in all aspects related to employment. The handbook addresses discrimination, harassment (including sexual harassment and sexual assault), and grievance procedures. It also addresses the student disciplinary process. Procedures for resolving complaints and grievances related to issues of harassment or discrimination are also included in the handbook. The Vice Provost for Institutional Equity and Diversity is identified as the University official to whom students may address their complaints.

1. Flyers and Posters

The University publishes a variety of material and notices regarding its nondiscrimination and anti-sexual harassment policies. These materials are also posted online. They include: an *Equal Opportunity Policy and Nondiscrimination Statement*, *Sex on a Saturday Night* playbill, e-mail notification to new employees regarding "Preventing Sexual Harassment" on-line training, a training screen shot, slides for the new hire and new manager orientation, and a document entitled *Legal Aspects of Supervision*, a staff handbook, and a publication entitled *Rights, Rules, and Responsibilities*.

2. Orientation

All incoming graduate students receive information on discrimination and harassment during orientation. Students are also required to participate in a mandatory program to raise awareness on sexual assault. The program is sponsored by SHARE and the Residential Education Program, and is entitled "Sex on a Saturday Night." It takes the form of a skit which is performed by students, and is intended to address the issue of

sexual assault. Following the skit there is a discussion that is facilitated by the residential colleges.

3. Other publications

The University's nondiscrimination policy and contact information for the Title IX Coordinator also appears in the *Graduate School Announcement Handbook*. This information is also contained in two other handbooks - one entitled *Diversity Matters-The Graduate School at Princeton University*, and the other entitled *Working at Princeton*.

Despite the fact that the University has complied with the requirement to designate someone to be responsible for coordinating its Title IX program, and to notify students, faculty and employees of their Title IX rights and obligations, no student or faculty member who was interviewed could identify the Title IX Coordinator or was familiar with the procedures for filing a complaint under Title IX.

Finding

We find that the University is in compliance with the notification requirements of notification under Title IX and DOE implementing regulations. Although in compliance, the University's notification processes and practices are not effective, inasmuch as the majority of the students and faculty who were interviewed were unaware of the identity of the Title IX Coordinator, or how to file a complaint. OCRD informed the University and the Vice Provost for Institutional Equity and Diversity of our preliminary observation and finding in this regard. As a result of this meeting, and later discussions with the Vice Provost, the University has instituted changes to its notification and dissemination processes. Specifically, the University has more prominently identified the Title IX Coordinator on the web pages of the Office of the Provost for Institutional Equity and Diversity, the Office of Institutional Equity and Diversity, and the Office of the Graduate School.

The University has informed the Department that a letter from the Title IX Coordinator will be sent every September to all undergraduate and graduate students, by electronic mail, informing students of the name and contact information of the Title IX Coordinator. Students will also be provided a web link to the University's discrimination and harassment policies and procedures. Students will be able to access on that web site the form for filing a Title IX complaint and information about resources and processes for resolving and filing complaints. Additionally, the University intends to develop informational materials regarding nondiscrimination and harassment policies, procedures and processes for inclusion in new student orientation packets, as well as for posting in various locations around the campus.

Recommendation

The Department recommends that the University monitor its methods for dissemination of the notification to students, faculty, and the University community at large to uncover

deficiencies, and to ensure the effectiveness of its newly instituted processes of notification and publication of the University's Title IX complaint process.

D. Complaint Process, Procedures – Anti-Harassment Policy and Grievance Procedures

The Office of the Provost has oversight of complaints of discrimination and is notified of all complaints. Complaints are received, reviewed, and processed via three primary avenues: the Office of the Dean of Faculty, if the complaint is against a faculty member; the Office of Human Resources, if the complaint is against a staff member; and through the undergraduate or graduate student disciplinary process, if the complaint is against another student. It is the responsibility of the deans, chairs, department heads, program directors, and managers to promptly notify the Deans of Faculty and Students, and the Human Resources Office when they receive a report, witness, or otherwise learn of complaints of harassment.

Academic departments do not have separate processes for receiving and processing Title IX complaints. All departments utilize the University's central process. Ordinarily, student complaints of discrimination and harassment are addressed by the Associate Dean of the Graduate School, or in the case of the faculty, by the Office of the Dean of faculty. Both student and faculty complaints are addressed in collaboration with either the Director of Equal Opportunity Programs or the Vice Provost for Institutional Equity and Diversity. If a graduate student brings a Title IX concern to the Physics Chair or the Director of Graduate Studies, the matter will be referred to the Dean of the Graduate School or the Dean of Faculty. Faculty members take their concerns to the Department Chair or to the Associate Dean of Faculty.

Procedures and processes for filing complaints of harassment on the basis of race, creed, color, sex, gender identity, age, national origin, ancestry religion, physical or mental disability, veteran's status, marital or domestic partnership status, or sexual orientation, or other classification protected by applicable law are set out in the University's handbook entitled *Anti-Harassment Policy and Grievance Procedures*, which was published in November 2007. The procedures make no reference to claims of Title IX sex discrimination.

1. Informal Resolution

The University utilizes both formal and informal procedures for processing complaints. These procedures are described in the *Rights, Rules, and Responsibilities* handbook. A student who wishes to file an informal complaint is encouraged to consult with either the Dean of the Undergraduate School, the Dean of the Graduate School, the Dean of the Faculty, the SHARE Counselor, the Director for Equal Opportunity Programs, or the University Ombudsperson. If a complaint cannot be resolved informally, the student is referred to the formal grievance process.

SHARE, the University Health Services Counseling Center, the Ombuds Office, Carebridge (an employee assistance service provider), and the Office of Religious Life provide confidential counselors to students and employees. These entities are not authorized to take any action on behalf of the University, nor are they allowed to maintain formal records of confidential communications. Students may also speak with their department chair, department head, mentor, director of student life, associate or assistant dean. After consulting with the counselor, if the student decides to make a formal complaint, the counselor will refer the student to the appropriate University administrator.

a. Harassment Resolution Facilitator

Whenever a harassment complaint is filed, the Director for Equal Opportunity Programs is notified. However, the University also provides harassment resolution facilitators. These individuals are authorized to receive, investigate and process complaints of sexual harassment and discrimination. These facilitators receive complaints either directly or in the course of a grievance or through the appeal process. Students may meet with Harassment Resolution Facilitators who will engage in fact-finding and attempt to resolve the issues. Facilitators are available to assist undergraduate and graduate students, members of the faculty and employees. Students are informed that they may also contact the Vice Provost for Institutional Equity or the Director for Equal Opportunity Programs.

b. Sexual Harassment/Assault Advising, Resources, and Education Services (SHARE)

SHARE operates through the University Health Services and is a resource for addressing sexual harassment or sexual assault complaints. The SHARE program provides a confidential place for discussing concerns, and for obtaining information, advice, and assistance with initiating formal complaints. The service publishes literature that defines sexual harassment and provides information about the informal and formal processes for addressing the sexual harassment issues. Designated individuals are:

c. Counselors

Counselors are designated by the University to ensure prompt responses to complaints of sexual harassment. They also are required to answer questions, provide guidance, discuss options, mediate informal complaint resolutions, and refer individuals to appropriate resources. Unlike confidential counselors, designated individuals have the responsibility to take prompt and appropriate action to resolve complaints.

d. Confidential Counselors

Confidential Counselors provide the individual with the highest level of confidentiality. They do not disclose information to anyone without the express permission of the person seeking help.

e. Ombuds Office

The Ombuds Office is not a representative of the University. It is a neutral, confidential, independent, and informal resource for all members of the University community. It provides voluntary mediation services, and facilitation and consultation services. The office also provides referral information for those seeking to use the grievance process.

2. Formal Complaint Procedures

If a matter involving alleged harassment or discrimination is not resolved informally, a formal written complaint may be filed with the Dean of the Undergraduate School or the Dean of the Graduate School. These administrators may refer the case to the Disciplinary Committee, to the Dean of Faculty, to the Vice President for Human Resources (if the complaint involves a staff person), or to the Director for Equal Opportunity Programs. Complaints against a student by another student of sexual harassment, discrimination, or sexual assault are investigated and resolved through the student disciplinary process.

The procedures require that a written complaint must identify the parties involved, describe the harassing behavior, including when and where it occurred, and identify any witnesses by name or description. Retaliation against an individual who has filed a complaint is prohibited.

At the time of the onsite visit, the University was not using complaint forms for the filing of Title IX discrimination or harassment complaints. “Optional Forms” provided by the SHARE Office and the LGBT Center were used for filing anonymous complaints. DOE has since recommended that the University develop standard forms for use in filing complaints.

A fact finding inquiry, or investigation, is conducted by the office that has responsibility for the accused. Following an investigation, the investigator prepares a written report which includes a summary of interviews with witnesses and any written statement of witnesses. The report also includes an explanation of the scope of the investigation and whether any allegations in the complaint were substantiated. The report and witness interviews are submitted to the Dean of Faculty or Vice President for Human Resources, and the Provost’s Office.

The Dean or Vice President may accept the report, or return it for further investigation. Findings are summarized and provided to the complainant, as well as to the accused. Findings are not appealable. However, parties are given ten days to respond, in writing, to the findings. In the case of a finding of inappropriate and unprofessional behavior (behavior that rises to the level of a violation), the accused may be disciplined, monitored, coached, or otherwise dealt with, as appropriate.

Corrective action will be taken to remedy the effects of the harassment if it is determined that the accused faculty member or employee violated applicable law. The violator may

be ordered to counseling, training, disciplined by written warning; or subjected to financial penalty, suspension, demotion, or termination. The violator may file an appeal of the proposed disciplinary action.

3. Student Disciplinary Process

The student disciplinary process entails filing a written complaint against the alleged offending student and notification by the complainant to the assistant or associate dean responsible for disciplinary matters within the Office of the Dean of Undergraduate Students. If the complaint is of a nature such that the student could be expelled, then in the judgment of the dean, all parties and witnesses must prepare written statements of the account of the event in question. If appropriate, the matter will then be referred to a subcommittee on discipline. The subcommittee will conduct fact-finding, which may include statements and interviews. Written findings and recommendations are then prepared and issued.

Separate procedures are applicable to graduate students. Complaints of harassment or discrimination are investigated and resolved through the student disciplinary process administered by the Office of the Dean of the Graduate School. If a complainant files a written complaint against another student, the complaining student must notify the assistant or associate dean responsible for disciplinary matter in the Office of the Dean of the Graduate School. The alleged violator will be notified and provided a statement of the charge and procedures governing the investigation. The student may submit a written response. If expulsion is not a likely outcome, then the dean will investigate, issue findings and take remedial action. If the charges could lead to expulsion, the dean will request written statements from all parties and witnesses, and refer the matter to the Dean of the Graduate School who will refer the matter to a subcommittee on discipline. The subcommittee will conduct fact finding, issue findings, and make recommendations on penalties, if any, to the Dean of the Graduate School.

Both graduate and undergraduate students may appeal decisions through the Judicial Committee of the Council of the Princeton University Community (CPUC).

4. Sexual Harassment Complaint Procedures

The procedures for filing complaints of sexual harassment are the same as those for filing a formal complaint, outlined above. The University facilitates access to its complaint processes by providing multiple points of contact for students, faculty and staff. The primary points of contact are: (1) the Office of the Dean of Faculty (if the complaint is against a faculty member); (2) the Office of Human Resources (if the complaint is against a staff person); (3) the undergraduate or graduate student disciplinary process (if the complaint is against another student). Students may also consult with a confidential counselor, under the SHARE Program. These counselors include the Chaplain in the Office of Religious Life, the Ombuds Officer, Carebridge, and University Health Services Counselors.

Confidential counselors are not authorized to take action on behalf of the University but, instead, may refer or direct the individual to the appropriate university official for pursuing informal or formal resolution.

a. Sexual Assault

Complaints of sexual assault are handled formally and are reported to the Associate Dean of the Graduate School or the Office of the Dean of the Undergraduate school. They are then addressed by the student disciplinary process. In addition, students may file a complaint with the Department of Public Safety. Students may also seek support from the SHARE Office and, of course, the matter may be pursued through the criminal justice system.

5. Complaints

No gender based complaint, sexual harassment complaint or complaint alleging sexual assault originated in the Graduate Physics Department from academic year 2005-2006 to academic year 2009-2010. During this period there were 66 allegations of sexual harassment, 15 allegations of sex discrimination and nine allegations of sexual assault throughout the entire University. There were no pending or unresolved investigations or complaints.

Finding

Title IX requires that recipients adopt and publish grievance procedures that provide for the prompt and equitable resolution of student complaints of discrimination. Accordingly, a recipient will be in violation if it does not have such procedures and policies in place. However, the regulations do not prescribe specific procedures. As noted above, the University's complaint procedures do not state that they are also applicable to sex discrimination complaints, although this is the intent of the University.

Title IX does not require the University to adopt procedures that provide separate grievance procedures for sexual harassment, harassment, and sex discrimination. However, if the procedures do not clearly inform students that they are applicable to complaints of discrimination, then the procedures will not be considered effective. We therefore, recommended that the University revise the procedures so that they plainly state that they are applicable to Title IX complaints. The University should also consider renaming the procedures to reflect their application.⁵ Similarly, the University has revised its procedures to provide for a recommended time period of 45 working days from the date of the receipt of a complaint to resolve the complaint.⁶

⁵ We note that the University has since amended its procedures to explicitly state that the procedures are applicable to complaints of discrimination.

⁶ At the time of the onsite visit, the grievance procedures did not provide for a time limit for resolution of complaints.

New language has been added to the procedures, which reads:

While the length of the process will depend on a variety of factors, including the nature and scope of the allegations, the number of parties and witnesses, and the availability of parties and witnesses, an effort will be made to conclude the process within 45 working days of receipt of the complaint.

Additionally, the following language has been added:

“Students are also afforded certain protections under federal and state laws, and may elect to file a harassment or discrimination complaint with a federal or state agency authorized to investigate such claims. The appropriate agency will depend on the nature of the complaint and status of the parties involved. One such agency is the United States Department of Education, Office for Civil Rights.”

The primary vehicle for publication of the University’s grievance and complaint procedures is the handbook entitled *Rights, Rules and Responsibilities*. This publication has been revised to reflect the recent changes and is available online. The hardcopy of the publication will reflect the changes when it is released.

The online locations of the complaint procedures and nondiscrimination and anti-harassment policies have been modified for easier access. They can be found at the following sites: Office of the Provost Web Page, Institutional Equity and Diversity Web Page; Institutional Equity and Diversity at Princeton Web Page; Office of Human Resources Home Page; Office of the Dean of the Faculty Web Page; Office of the Dean of the Faculty Professional Web Page; Office of the Graduate School Student Life Web Page; and the Office of the Dean of Undergraduate Students Community Standards Web Page. In addition, the web pages of the Office of the Provost, the Office of Institutional Equity and Diversity, and the Office of Graduate School Student Life have been revised and updated to prominently identify the Title IX Coordinator.

Pursuant to discussions held with the University regarding our preliminary findings and recommendations, the University has developed an online standard complaint form for filing complaints of discrimination and harassment. These forms are made available online and in the Office of the Vice Provost, the Office of the Dean of Faculty, the Office of the Dean of the Undergraduate School, and the Office of the Dean of the Graduate School.

V. Nondiscrimination and Sexual Harassment Policies

A. Nondiscrimination Statement/Notification of Nondiscrimination Policies

Title 10, Code of Federal Regulations, Section 1042.140 (a), requires that recipients of subvention provided by DOE implement specific and continuing steps to notify all interested parties that they do not discriminate on the basis of sex in the educational programs and activities that they operate, and that this is also a Title IX requirement. The

notification must be published in newspapers and magazines, and by memorandum and other written communications, such as bulletins, catalogs and applications, and recruitment materials.

The University's nondiscrimination statement is published on line at: <http://www.princeton.edu/pub/rrr/eop/>. The *Rights, Rules, Responsibilities* guidebook and *The Graduate School Announcement* bulletin (2006 Edition) also contain the statement. The statement reads:

In compliance with Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and other federal, state, and local laws, Princeton University does not discriminate on the basis of age, race, color, sex, sexual orientation, gender identity, religion, national or ethnic origin, disability, or status as a disabled or Vietnam-era veteran in any phase of its employment process, in any phase of its admission or financial aid programs, or other aspects of its educational programs or activities. The vice provost for institutional equity and diversity is the individual designated by the University to coordinate its efforts to comply with Title IX, Section 504 and other equal opportunity and affirmative action regulations and laws. Questions or concerns regarding Title IX, Section 504 or other aspects of Princeton's equal opportunity or affirmative action programs should be directed to the Office of the Provost for Institutional Equity and Diversity, Princeton University, 205 Nassau Hall, Princeton, NJ 08544 or (609) 258-6110.

The Office of the Vice Provost and the Office of the Director for Equal Opportunity Programs are primarily responsible for reviewing and updating the anti-discrimination and anti-harassment policies and procedures. The Nondiscrimination Statement and Equal Opportunity statement were last updated in January 2010, and the anti-harassment policy statement and procedures were last updated in September 2008. *Rights, Rules and Responsibilities* was updated in June 2009. The procedures for faculty were updated in June 2009, and more recently in March 2010. Complaint procedures were updated in September 2008.

The University reports that the Office of the Provost, in conjunction with the Office of Human Resources and the Office of the General Counsel, is reviewing the various state and Federal notices, including Title IX notices. Following the review, the notices will be posted at various locations on the campus.

B. Sexual Harassment Policy

The University has developed and implemented an anti-harassment policy that covers all forms of unlawful harassment, including sexual harassment. The online publication may be found at www.princeton.edu/anti-harass . Additionally, the university publishes *Respect for Others* at www.princeton.edu/pub/rrr/part1.

In 2007, the University developed and implemented a new anti-harassment policy that covers all forms of harassment, including sexual harassment. According to the

University, these policies and procedures significantly expanded the prior policy. They serve as the University's primary policy relating to filing, receiving, investigating and processing complaints of harassment and discrimination. The online publication is found at www.princeton.edu/anti-harass policy. Other sites where the policy can be found are:

<http://www.princeton.edu/diversity/resolving/harassment/>
<http://gradschool.princeton.edu/studentlife/health/>
<http://www.princeton.edu/uhs/student-services/share/>
<http://www.princeton.edu/lgbt/index.htm>

The policy on Sexual Harassment is specifically set forth and reads, in part:

Every member of the University community should be aware that the University is strongly opposed to sexual harassment and assault and that such behavior is prohibited both by federal and state law and by University policy. It is the intention of the University to take whatever action may be needed to prevent, correct, and if necessary, discipline behavior that violates this policy.

The University has recently established a working group to review policies and procedures for adjudicating undergraduate sexual assault complaints. The findings and recommendations will also impact graduate students, faculty and staff.

C. Training

New staff and faculty are required to complete sexual harassment training. The training focuses on sexual harassment, and resources and procedures for addressing complaints. Online training is accessible at <http://princeton.edu/antiharass>. Onsite training is available to departments upon request. Staff and faculty are notified of this training requirement within the first week of their hire. They are given a handbook which addresses resources and sexual harassment reporting requirements.

The University's anti-harassment policy and procedures is distributed to new managers during their orientation. Orientation includes a discussion of gender discrimination. Managers also receive information regarding anti-harassment through a course entitled, "Aspects of Supervision." This course is mandatory for those seeking a manager's certification.

The majority of students and faculty who were interviewed could not recall receiving any anti-harassment training. A few faculty members had vague recollections of some type of online harassment training. The University indicated in its data request response that it is planning a refresher course for the 2010-2011 academic year on preventing sexual harassment. It also plans to explore a vehicle for providing student awareness campus-wide to address harassment, assault and discrimination. The University has plans to include a photograph of the Title IX coordinator through this medium.

Finding

The Department finds that the University has developed nondiscrimination and sexual harassment policies that are in compliance with Title IX requirements. Sexual harassment training for faculty is also provided. Despite these efforts, at the time of the onsite visit, members of the University community were not fully aware of their rights and responsibilities under Title IX. Accordingly, the University is encouraged to take steps for ensuring that its Title IX programs and activities are effective. The University should also proceed with plans to provide refresher awareness training for faculty and students.

VI. Family Focused Initiatives

The University has instituted a number of family-friendly policies who are positively perceived by many graduate students and faculty that were interviewed. These policies help students and faculty balance academic demands and personal responsibilities, and are likely to contribute to the retention of students, male and female alike.

1. Childbirth Accommodation and Adoption Policy

This policy helps to accommodate the family needs of graduate students. Twelve weeks of paid maternity leave is provided. A student who is on maternity leave is relieved of her teaching and other academic obligations. In addition, doctoral students who are primary caregivers are given an extension of academic deadlines, and provided an additional term of financial support to complete their studies. The benefit is automatic, and also applies to a student who adopts a child.

2. Student Child Care Assistance Program

This program provides taxable grants for child care (pre-kindergarten) to eligible graduate students, and may be used to pay for a variety of child care arrangements, including in-home care. The maximum grant is \$5,000, for one child, and \$10,000 for two or more children. Income limitations for eligibility apply.

3. Work Options Backup Care

Graduate students are provided backup care for up to three dependents (adults, elders, or children) at a reduced cost of \$4 per hour for in-home care, or \$2 per hour for center-based care.

4. Dependent Care Travel Fund

Graduate students who are pursuing research may receive funds to pay the costs of dependent care while they attend academic conferences or similar events. This program meets the career development needs of students for presenting their research.

5. Carebridge

Students are provided counseling assistance for personal matters related to stress, depression, substance abuse, finances, and primary relationships

6. Lotsa Helping Hands

This is a confidential web-based tool that offers students guidance on family responsibilities.

7. Mortgage Program

In partnership with Countrywide Home Loans, students are offered home mortgages at a reduced cost.

Promising Practices

As a part of the compliance review process, the Department seeks to identify and acknowledge any promising practices which could be adopted by other educational institutions. In this regard, the review team identified several noteworthy policies.

The University implements a reenrollment process that provides for the early identification of academic deficiencies for all graduate students. This process provides students and the University the opportunity to address any problems that might lead to the student's failure and subsequent withdrawal or removal from the graduate program.

Another promising practice is the University's financial aid policy under which financial support is provide to graduate students. All graduate students are given a generous stipend in addition to free tuition. These benefits greatly reduce the financial burden associated with being a fulltime student. Additionally, generous financial assistance can contribute to attracting students to the school and retaining them in their program of graduate study.

The University's family friendly programs are viewed favorably by students and faculty. They contribute to helping student and faculty balance academic demands with their home and family obligations. In particular, the child care assistance and backup child care programs are low cost, thereby providing financial relief, as well as convenience to students and faculty who utilize the program.

VII. Conclusion

The Department finds that the Graduate Physics Department at Princeton University is in compliance with Title IX and DOE implementing regulations. The review uncovered no evidence of discrimination in the implementation of the University's recruitment, admissions, retention, and financial assistance policies, procedures, or processes. The

Department also finds that the University has complied with the grievance and notification requirements of Title IX and DOE implementing regulations.

The number of female students who are admitted and enrolled in the Graduate Physics Program is small in relation to the number of males in program. This is not surprising, given the low number of female applicants. Although, we find no evidence of discrimination in the admissions policies and practices, or in the outreach and recruitment practices of the University, we recommend that the University evaluate the effectiveness of its current outreach and recruitment programs as they relate to the Graduate Physics Department and the institutional goals of the University to attract underrepresented groups to its programs.

Although the Department finds the University to be in compliance with the notification requirements of Title IX and DOE implementing regulations, at the time of the onsite visit, the notice was not effectively being communicated to the University community. A majority of the students and faculty who were interviewed were unaware of the identity of the Title IX Coordinator and had no idea as to how to file a complaint. This observation was shared with the administrators during the closing session of the onsite visit. Following the onsite review, the Vice Provost for Institutional Equity and Diversity was made aware of this finding. As a result of these discussions with University staff, the University revised and instituted changes to its notification and publication processes and methods of dissemination. The Department recommends that the University monitor these processes to ensure their continued effectiveness, and to make improvements when necessary.

The Department finds that the University's nondiscrimination and sexual harassment policies are in compliance with Title IX requirements. Although sexual harassment training is provided to the faculty, the University is encouraged to proceed with plans for providing refresher training to the faculty and awareness training to students.

The University has amended its grievance procedures to include a time frame for resolving complaints. The University has also revised the procedures so that they now plainly state that they are applicable to complaints of discrimination. Consistent with the Department's recommendations, the University has renamed the procedures so as to reflect these revisions.

The Department also recommended that the University develop standard complaint forms for filing complaints of discrimination and harassment, and that the forms be made available on-line and in the Offices of the Vice Provost, the Office of the Dean of Faculty, the Office of the Dean of the Undergraduate School, and the Office of the Dean of the Graduate School. As with the Department's notification recommendation, the University immediately created a standard complaint form. The Department commends the University for its promptness in implementing the Department's recommendations, and also for the assurance it has given that it will continue to monitor and assess the effectiveness of its Title IX policies and practices.