



TITLE IX COMPLIANCE REVIEW REPORT

University of Southern California
Ming Hsieh Department of Electrical Engineering



Office of Civil Rights
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I. Introduction

The Office of Civil Rights (OCR) of the United States Department of Energy (DOE or the Department), conducted a Title IX compliance review of the University of Southern California's Viterbi School of Engineering, Ming Hsieh Department of Electrical Engineering graduate programs for the academic years 2006-2007 through 2010-2011. OCR conducted the compliance review pursuant to Title IX of the Education Amendments of 1972 (Title IX), as amended, 20 U.S.C. Section 1681, *et seq.*, and DOE's implementing regulations at 10 C.F.R. Parts 1040 and 1042. This report of findings is based on a review of records and other data provided by the University, information obtained from the University's website, and information obtained through interviews of students, faculty, and administrators of the Ming Hsieh Department of Electrical Engineering graduate programs, the Director of the Office of Equity and Diversity, and other University administrative officials.

A. Background

DOE supports a diverse portfolio of research at colleges, universities, and research institutions across the United States, providing funding to more than 300 such institutions every year. The funding provided by DOE for research at universities and colleges supports thousands of principal investigators, graduate students, and post-doctoral researchers. DOE provided over \$28 million in financial assistance to the University of Southern California's Viterbi School of Engineering, Ming Hsieh Department of Electrical Engineering graduate programs during the period under review.

The Title IX statute and DOE's corresponding Title IX implementing regulations prohibit recipients of federal financial assistance, such as universities and colleges, from discriminating on the basis of sex in any of their educational programs or activities. 20 U.S.C. § 1681(a); 10 C.F.R. § 1042.100. In addition, DOE's regulations at 10 C.F.R. Parts 1040 and 1042, require the Department to periodically conduct compliance reviews of recipients of DOE financial assistance to ensure compliance with the nondiscrimination requirements of Title IX. *See* 10 C.F.R. §§ 1042.605, 1040.101(a).

In July 2004, the Government Accountability Office (GAO) issued a report (GAO-04-639) entitled, "GENDER ISSUES: Women's Participation in the Sciences has increased, but Agencies Need to do more to Ensure Compliance with Title IX." The purpose of the report was two-fold: (1) to report on the status of women in the sciences; and (2) to evaluate the Title IX compliance activities of the four federal science agencies—the

Department of Energy, Department of Education, National Aeronautics and Space Administration, and National Science Foundation. With respect to the status of women in the sciences, the GAO reported that the participation of women in the sciences at the undergraduate and graduate levels had increased over the past 30 years; however, the GAO reported that “[w]omen continue to major in the sciences and earn degrees in the sciences to a lesser extent than men.” The GAO also noted that some studies suggest that sex discrimination may still affect women’s choices and professional progress in the sciences. With respect to the Title IX compliance activities of the four federal science agencies, the GAO found that the agencies had taken steps, through conducting complaint investigations and the provision related to technical assistance, to ensure that the institutions to which they provide financial assistance are in compliance with Title IX. However, the GAO noted that “[g]iven the general lack of knowledge and familiarity with the reach of Title IX and the disincentives for filing complaints against superiors,” the agencies needed to do more to judge whether sex discrimination exists in the sciences. To that end, the GAO made recommendations specific to each of the four federal science agencies. With respect to the Department, the GAO recommended that the Secretary of Energy ensure that compliance reviews of grantees are periodically conducted.

Additional statutory authority requiring the DOE to conduct compliance reviews is found in the America COMPETES Act, Pub. L. No. 110-69, § 5010, 121 Stat. 572, 620 (2007), first enacted in 2007 and then re-authorized in 2011. The Act states that the Department should: (1) implement the recommendations contained in the GAO report; and (2) conduct at least two Title IX compliance reviews annually of recipients of DOE financial assistance.

The Department uses neutral criteria in selecting institutions to review in accordance with Title IX. DOE began conducting Title IX reviews in 2005 and at that time decided that they would be conducted on a rotating regional basis each year with the specific graduate discipline varying each year as well. For FY 2011, the ‘Southern Region’, which includes southern California was next in line for review. The University of Southern California was selected because it had received the highest level of funding in that region for the field of electrical engineering which was that year’s chosen graduate study discipline.

B. Objective

The objective of the Title IX compliance review at USC was four-fold: (1) to determine whether male and female applicants and students had equal access to the opportunities and benefits offered by the Ming Hsieh Department of Electrical Engineering’s graduate programs; (2) to determine whether the University was in compliance with the requirements of Title IX and DOE Title IX implementing regulations; (3) to identify and report on any promising practices instituted by the University for promoting equity among male and female students and applicants; and 4) to identify and report on any areas of concerns and recommendations for improvement to promote equity between male and female student applicants.

DOE Title IX implementing regulations prohibit recipients of financial assistance from discriminating on the basis of sex in the recruitment of students. 10 C.F.R. § 1042.310. To determine whether the EE Department was in compliance with this provision, the OCR reviewed the recruitment and outreach activities of the EE Department. The University's outreach and recruitment efforts were overwhelmingly not aimed specifically at recruiting female students. Rather, their efforts were gender neutral and included standard techniques utilized by most schools which included utilizing websites, social media, and attending recruitment fairs at other universities to reach undergraduate students. While the University did expend some efforts to recruit "underrepresented" students all indications are that "underrepresented" students were targeted based on their ethnicity, not gender.

The University informed DOE that outreach and recruitment events have increased significantly since 2006, with the creation of the Office of Master's and Professional Programs (MAPP) and the Office of Doctoral Programs (ODP). According to the University, three full-time staff members in the MAPP office are responsible for outreach and recruitment of master's students. Outreach and recruitment efforts consist of the following:

- Attendance at college fairs in the U.S.
- Visits to companies participating in the Viterbi School Distance Education Network (DEN) whose technical staff earn Master's degrees via DEN
- Mailings to prospective students using names purchased from the Educational Testing Service
- Web presence

In addition, the University informed DOE of the following outreach and recruiting efforts for 2010-2011:

1. Special Events

- a. **REACH program inaugurated in October 2010.** Twenty-seven underrepresented prospective Ph.D. applicants visited USC for a three-day doctoral review program. Students met with current students and discussed research opportunities with faculty. According to the University, 15 of the 27 attendees applied for doctoral admission for fall 2011.
- b. **Master's Preview Days.** In November 2010, over 200 prospective Master's students visited the USC campus, met with faculty and current students, learned about academic programs and research opportunities, and experienced USC first-hand.

- c. From January-April 2010, one faculty member became a visiting scientist at a Historically Black College/University to develop and involve undergraduate students in research projects. The purpose was to interest the students in graduate study.
- d. On April 26, 2010, nine Viterbi School faculty and one staff member participated in the first ever “Crenshaw to College Day” event at Crenshaw High School, organized by the Los Angeles Urban League, where 30-minute mini-lectures were given by faculty to high-school freshman introducing them to engineering and the importance of pursuing post-secondary education. The University explained that the pipeline to graduate education begins in the freshman year of college.
- e. On September 28, 2010, the University held a Viterbi School Graduate Studies outreach event at the University of Puerto Rico at Mayaguez, a Hispanic-serving institution (HSI) that produces the largest number of engineering bachelor’s degrees awarded to Hispanic-American students by any university in the nation. The event was attended by approximately 70 underrepresented minority (Puerto Rican) students, about 30% of whom are women (according to the University).
- f. On November 11, 2010, the University held a Viterbi School Graduate Studies outreach event at Johnson C. Smith University. The event was attended by over 20 underrepresented minority (African-American) students, at least a third of whom were female.

2. Special Programs

- a. Summer internships are awarded for junior level undergraduate students to work with faculty and doctoral students in the University’s laboratories to experience advanced research activity. The eight-week program pays a \$5,500 stipend and offers supplemental activities. According to the University, it makes extra efforts to recruit applications from underrepresented students into this program through contacts with Centers for Diversity at other campuses. After an internship, the faculty often recommends a student participant for admission to the Ph.D. program.
- b. The Viterbi Integrated Master of Science Program (VIP) partners with U.S. colleges of engineering, and allows high-achieving undergraduates to complete a general Master of Science in Electrical Engineering with up to a six unit reduction of the total 27 units required.

- c. In 2010, the Viterbi School took the first steps toward formal partnerships with two minority-serving institutions (MSIs) to place students into its graduate programs.

3. Remote Students

The Viterbi School offers more than 30 Master's programs to over 1,000 remote students via its Distance Education Network (DEN). Most students are employed at high-tech companies. DEN staff reach out to prospective students through:

- a. Online and in-person information sessions held in key markets such as Los Angeles/Orange County, Houston, Chicago, and Seattle;
- b. Online marketing and social media such as WebEx sessions, Facebook, Twitter, and LinkedIn;
- c. Industry Conferences, such as Space & Missile Defense, Construction Management Association, INCOSE (the International Council on Systems Engineering) SPE (the Society of Petroleum Engineers) conferences, the Space Symposium, and the Radiological Society of North America; and
- d. Attending education fairs at corporations such as Boeing, Baxter, Pratt & Whitney, Raytheon, (the Viterbi School attended over 20 education fairs in 2009-2010).

4. Viterbi K-12 Outreach Center

Although not listed in its response to DOE's request for information regarding outreach efforts, DOE noticed on VSOE's website that the school has a K-12 and Community Outreach Center. The mission of the Outreach Center is to provide a comprehensive approach to engineering education in K-12 and community settings that engage the public in participating in Science, Technology, Engineering, and Mathematics (STEM) education through diverse community activities.

5. Promising Practices in Recruitment Efforts

The VSOE and Ming Hsieh Department of Electrical Engineering have developed and implemented extensive recruiting and outreach activities and events. Similar to other universities, most of the outreach and recruiting efforts have been aimed at undergraduate students. However,

we find the VSOE and the Ming Hsieh Department of Electrical Engineering outreach and recruitment efforts have been more extensive than most of the other universities reviewed by OCR thus far.

OCR particularly commends three of the University's efforts to attract male and female students to its graduate EE programs. The first commendation is for the University's use of the DEN program, which permits students to obtain a graduate degree through online courses. We find that this encourages both male and female students to obtain a graduate engineering degree who may not have otherwise pursued such a degree, because a potential student did not want to leave a job, move a family or be away from family, move from a particular geographical location, or a myriad of other reasons. The second commendation goes to the University for beginning to visit students at the high school level to encourage both male and female participation in engineering. The third commendation goes to the University for its K-12 and Community Outreach Center and activities. OCR considers such efforts to attract both male and female students to its graduate EE programs as promising practices that could be used as a model for other universities to follow.

Findings and Recommendations

Although the University participates in a variety of outreach and recruiting events and activities, most of the students interviewed stated that they were not specifically recruited by the University, and that they were attracted to the University because of the University's reputation, areas of research, or professors. A few students stated that they had participated in at least one recruitment/outreach activity sponsored by the University/EE Department, or that the University paid for the student's travel expenses to visit the school. The majority of recruiting efforts seem to not have a specific focus on recruiting "underrepresented" students and outside of supporting the DEN Conference, it would seem as if the University aims to reach potential female students through general outreach and recruiting and not through efforts targeted to women.

There is reason to believe that the University may allow greater female participation in graduate education through its Distance Education Network which makes graduate education available to students remotely. Many females have familial obligations that could preclude them from full-time, on campus enrollment in a graduate program. Therefore, the Department commends the University on promoting this flexibility in their graduate programs.

The review revealed no evidence of discrimination on the basis of sex insofar as the VSOE and Ming Hsieh Department of Electrical Engineering's recruitment and outreach activities are concerned.

The OCR recommends that the University continue its efforts to encourage high school students' interests in science, technology, engineering, and math but also encourages the University to consider engaging middle school girls in STEM activities as this is a crucial age where girls can either lose interest in STEM or have their interest in it reinforced which will make it much more likely that they pursue it in high school and college.

The OCR encourages the University to increase its outreach and recruitment efforts to women in particular, possibly by greater involvement in women-focused organizations.

B. Admissions

Application to the EE graduate programs are made online. The University explained that there is no single criterion or formula used to determine admission at the Master's level where candidates are evaluated primarily on preparation for their program of interest. Prior educational history, especially proven success in previous academic endeavors and in prerequisite coursework relevant to their intended major degree field, is given primary consideration. The University's Graduate Admissions page on its website stated that in order to be considered for any graduate program, a student must have a minimum undergraduate grade point average of 3.0 on a 4.0 scale and combined Quantitative and Verbal GRE scores of no less than 1,000. It also states that each department sets its own standards, which tend to be more competitive. However, the University did not state, nor did DOE find on the University's website, whether a threshold GRE score must be obtained to be considered for admission to one of its 11 EE graduate programs. Letters of recommendation, statement of purpose, and CV are optional for most VSOE M.S. programs.

According to the University, Ph.D. admissions are highly competitive and the University aims at having Ph.D. students fully funded and engaged in research while in the program. Thus, only students who meet certain criteria and have strong support from at least one faculty member are admitted. This means that highly qualified students might not be admitted if a good match does not exist between a student's area of interest and that of faculty who are actively recruiting that year.

1. Ranking Applicants and Numerical Limitations on the Admission of Applicants to Graduate Electrical Engineering Programs

The University states that at the Master's level, applicants to the EE Department are not ranked in the admission process, and that applicants to the Ph.D. programs are ranked only for the purpose of nominating students for fellowships.

The University also states that it does not have a numerical limitation on the admission of applicants to its M.S. programs, but does consider access to the scheduled courses, classroom facilities, and overall target enrollment based on its budget. Ph.D. admission

limits are imposed by faculty. According to the VSOE Dean, on average, the school strives to admit and graduate about one Ph.D. student per faculty per year.

2. Admissions Statistics

Below is a summary of the total applications, admissions, and enrollment by gender for the entire five-year period under review. These numbers are totaled across all 11 graduate degree programs of which 2 are Doctorates. Of particular interest to DOE, was whether there was a disparity in the ratio of male and female student applicants and male and female applicants who were admitted.

Academic Year	Applications		Admissions		Enrollment	
	Male	Female	Male	Female	Male	Female
2006-07	1733	370	810	168	369	71
2007-08	1846	386	829	196	381	71
2008-09	1787	350	865	170	373	78
2009-10	1965	413	883	177	400	81
2010-11	2363	607	837	222	368	85

Although the review showed no evidence of disparate treatment in the admission's process, an examination of the data showed several instances in which one sex was admitted at a significantly* higher rate than the other sex. For instance, the admission statistics for an M.S. in Computer Engineering show that in three of the five years reviewed, the difference in the percentage of male and female applicants who were admitted was over 10%. For AY 2006-2007, 89 males applied for admission, and 61 (69%) of the males who applied were admitted. For the same AY, 26 females applied for admission, and 13 (50%) were admitted. Thus, the male admission rate was 19% higher than the female admission rate for AY 2006-2007. For AY 2007-2008, the male admission rate was 14% higher than the female admission rate. In addition, for AY 2009-2010, the male admission rate was 11% higher than the female admission rate. A review of the annual admission rates shows that males were not always admitted at a higher rate than female applicants. For instance, the admission statistics for a Ph.D. in Computer Engineering show that in AY 2010-2011, the female admission rate was 17% higher than the male admission rate.

The data also shows that there were two graduate programs, the V.I.P. in Electrical Engineering and Engineer in Electrical Engineering, which had a low number of both male and female applicants. However, in two of the AYs, male applicants were admitted, but no female applicants were admitted. For AY 2010-2011 in the V.I.P. in Electrical Engineering program, one male and two females applied. The male candidate was admitted (100%), but neither female candidate was admitted (0%). For AY 2007-2008 in

* 10 percent or more.

the Engineer in Electrical Engineering program, seven males and three females applied. Two male candidates were admitted (29%), but no female candidates were admitted (0%). Conversely, there are no AYs in which both sexes applied, but only female applicants were admitted.

To obtain a broader picture of whether there was a disparity in the ratio of male and female students who applied and were admitted to one of the University's 11 graduate EE programs, DOE analyzed the admission statistics of the entire five-year period covered in the review. DOE notes that over the five-year period reviewed, three of the University's graduate EE programs admitted one sex at a significantly higher rate than the other. Similar to that noted above, male admission rates to the V.I.P. in Electrical Engineering and Engineer in Electrical Engineering were 100% higher than female admission rates over the five-year period reviewed. The male admission rate to the M.S. in Electrical Engineering was 18% higher than the female admission rate over the five-year period reviewed.

3. Student Evaluation of the Admissions Process

A majority of the students who were interviewed described the admissions process as a "standard process." It involves completing an application form and submitting test scores, a letter of interest or a statement of purpose, and letters of recommendation. Most of the students who were interviewed said they did not believe anything in their admission experience was unfair. Although they recognized that there was a significantly larger number of male students in the University's EE graduate programs, they did not believe that the admission's processes were discriminatory on the basis of a student's sex.

Findings and Recommendations

Although the review showed no evidence of disparate treatment in the admission's process, an examination of the data showed several instances in which one sex was admitted at a significantly higher rate than the other sex. When analyzed on an annual level, the admissions statistics show that there are some years and some graduate EE programs in which one sex was admitted at significantly higher rates than the other sex. This does not necessarily mean that one sex was treated more favorably than the other, nor does it necessarily mean that one sex suffered a disparate impact. However, when evaluating the entire five-year period covered in the review, there were three graduate EE programs in which males were admitted at significantly higher rates than females. This suggests that part of the admission policies, procedures, and/or selection criteria may have a disparate impact on females.

DOE recommends that the University conduct an internal review of the admissions processes for its graduate EE programs which have significantly higher admission rates for one sex over the other to determine whether parts of the admission policies, procedures, and/or selection criteria are more favorable to one sex than the other. Additionally, a comparison of the University's admission data to national admission

statistics related to gender would be a worthwhile effort to see if the disparity is in-line with national trends possibly related to female preparation for graduate study in electrical engineering or if it's specific to USC.

C. Degree Completion and Retention

DOE Title IX implementing regulations state that “no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic...or other education program or activity operated by a recipient” of financial assistance. 10 C.F.R. § 1042.400. The Department evaluated USC Department’s leave of absence and re-enrollment policies to determine whether they comply with this general provision of nondiscrimination on the basis of sex.

The University has a number of leave, re-entry, and extension petition processes that are under the purview of the Graduate School. Such requests include requests for a leave of absence, application for readmission, requests for childbirth and adoption accommodation, and requests for an extension of time to complete a graduate degree. In some instances, the EE Department may grant a request without Graduate School approval.

1. Time Limit for Degree Completion and Extensions

The University’s time limit for degree completion is measured from the semester in which the first course is applied to the degree. A Master’s degree candidate is expected to complete his/her degree within five years. However, an academic department may grant an extension of up to one year at a time for a maximum of two years. A Doctoral degree candidate is expected to complete his/her degree within eight years. However, if a student earned an applicable Master’s degree within five years prior to admission to the Doctoral program, the time limit for completing the Doctoral degree is six years from the date of admission to the doctoral program. With regard to a Ph.D. degree, an academic department may grant an extension of up to two semesters at a time for a maximum of four semesters. In unusual cases, a student’s committee and the Department Chair may petition the Graduate School for further extensions.

The University stated that the average time taken by students to earn the Ph.D. degree in the Department of EE in the 2006-2010 time period was 6.00 years for male students and 6.27 years for female students. The average time taken by students to earn the Master’s degree in the Department of EE in the 2006-2010 time period was 2.00 years for both male and female students.

2. Leave of Absence

University policy allows for students to petition for a leave of absence (LOA). Departments are permitted to grant LOAs without Graduate School approval for one semester at a time and for up to four semesters total for domestic students. International

students must receive OIS (Office of International Services) approval for each semester, in addition to the department's approval. Graduate School approval is required if a student requests more than four semesters of leave.

3. Childbirth & Adoption Accommodations

The University has a Childbirth & Adoption Accommodation Program for eligible Ph.D. students who become pregnant, become a parent, or who will be the primary caregiver of their newborn child, or an adopted child. Under the program, a Ph.D. student who meets the following criteria is eligible for a one-semester parental leave:

- The student is pregnant or is the primary caregiver of her or his infant child or adopted infant child.
- The student has completed at least one semester in her or his Ph.D. program and is in good academic standing.
- The student was admitted with an offer letter for a 4 or 5-year "package" consisting of support through any combination of teaching assistantship, research assistantship, and fellowship.

Parental leave may be taken by a Ph.D. student during the semester in which the student's child is born or adopted, or during the semester immediately following. Parental leave does not constitute a break in the student's enrollment.

A student on approved parental leave receives the base graduate assistantship stipend from the Graduate School for one semester. However, the individual schools are expected to top off the base stipend to the level of the stipend stipulated in the student's offer letter and to pay for the student's USC student health insurance coverage and student health center fee.

4. Application for Readmission

A student who wishes to return to the same graduate degree program in the VSOE after being absent from the University without an approved LOA, must formally request readmission through the Department Chair. According to the Application for Readmission, if a student's cumulative graduate GPA is below 3.0, or if readmission is sought after more than two years of unapproved absence, the Application for Readmission must be approved by the Graduate School. Students seeking readmission after an absence of more than 10 years may be required to re-apply to the University.

Over the five-year period under review, 70 applicants applied for readmission to EE graduate programs. According to the University, all of the applicants were granted readmission.

5. Retention Statistics

According to the University's records, for the five-year period under review, the attrition rate of males in the Ph.D. programs was approximately 22%, and the attrition rate of females in the Ph.D. programs was approximately 12%. The University did not have a system in place to track and/or identify the attrition rates of male and female Master's degree students, but planned to update its student records systems so that students who dropped out could be systemically identified.

Findings and Recommendations

DOE finds no evidence of gender disparity insofar as it concerns VSOE's and the Ming Hsieh Department of Electrical Engineering's policies and procedures related to the time limit imposed for degree completion, requests for an extension of time to complete a graduate degree, requests for leaves of absence, and requests and approval of readmission. Additionally, DOE commends USC on its policy to allow a full semester off pursuant to the Childbirth and Adoption Accommodation Program. Therefore the Department finds that the leave of absence/reenrollment policy outlined above complies with the nondiscrimination requirements of Title IX and DOE Title IX implementing regulations.

OCR notes that although there is a statistical difference in time to Ph.D. degree completion between males and females, 6.0 years and 6.27 years respectively, this is a minimal difference and not significant enough to warrant concern.

One area of concern for DOE relates to the University's Childbirth & Adoption Accommodation Program. Overall, we commend the University for having a program that allows new parents in Ph.D. programs to maintain continuous enrollment and the ability to maintain their stipend and access to healthcare while on parental leave. However, we are concerned about the disproportionate adverse impact that the facially neutral eligibility criteria may have on females. If a female applies to a Ph.D. program, is admitted, finds out she is due to have a child during her first semester of enrollment, and wants to take leave, then she would not be eligible for the Childbirth Accommodation because she did not complete at least one semester. Presumably, she could begin the semester and request a LOA, however, it appears that she would lose her stipend. If a female in this scenario wanted to delay her enrollment until after childbirth, there is no guarantee that she could do so. Per the Graduate School's FAQs, USC does not defer offers of admission. A student may "update" their application to be considered for a future term that begins within one year (two semesters) of the original application, but they are not guaranteed admission to a future term.

Even though this policy is facially neutral, it may have a disproportionate adverse impact upon females because females typically take time off of work and school to heal from childbirth and bond with a new baby. While males may take time off of school and work

to bond with a new baby, it does not occur at the same frequency as females, and females are typically a newborn's primary caregiver.

DOE recommends that the University review its policies related to its Childbirth & Adoption Accommodation Program (and its admission deferment policies as they relate to pregnancy, childbirth, and adoption) to see if there is a way to alleviate the adverse impact those policies may have on females.

D. Financial Assistance

DOE Title IX implementing regulations state in providing assistance to any of its students, a recipient shall not, on the basis of sex, provide different amounts or types of such assistance, limit eligibility for such assistance, apply different criteria, or otherwise discriminate. 10 C.F.R. § 1042.430. The OCR evaluated the different types of financial assistance made available by the USC Department to its students, including financial recruitment incentives, to determine compliance with this provision.

Financial assistance is available to graduate students through a variety of means. The most common means are discussed below.

1. Recruitment Incentives

The Department of EE offers financial aid packages discussed below as a means of recruiting prospective students for its graduate programs. In addition, admitted students are invited to visit the department for recruitment and/or conversion events, and some students receive a reimbursement toward their travel expenses. The school provides a \$5,000 additional award to students who have received prestigious national fellowships, to selected domestic and under-represented students in engineering. Application fee waivers (value \$85) have also been offered to Master's students who attend recruitment events such as the annual "Preview Day" held each November.

Students are offered recruitment incentives at the time of admission. The University has one financial award specifically directed toward the recruitment of women into the Viterbi School of Engineering called the Women in Science and Engineering (WISE) Top-off Award. Top-off Fellowship funds are available to facilitate the recruitment of outstanding Doctoral students to USC. The funds provide four incoming Ph.D. students to Viterbi School of Engineering with a WISE Fellowship to supplement their financial support packages. Each WISE Fellowship will carry a stipend of \$5,000 in the first year and may be renewed for a second year pending satisfactory progress verified by the faculty advisor.

There are also a number of non-gender related incentive awards given each year which are based on a ranked nomination list from the departments. Factors considered when determining recruitment incentives include:

- Undergraduate and graduate GPA (the University did not state whether a minimum GPA was required);
- Previous schools attended;
- GRE scores, especially quantitative (the University did not state whether a minimum GRE score was required, or if there was a minimum score required for the quantitative portion of the GRE);
- Letters of recommendation (3 minimum);
- The applicant's area of research interest compared to the interests of electrical engineering faculty;
- The statement of purpose by the applicant, especially previous research experience;
- Previous research publications (if any), quality of conference and/or journal papers;
- Funds available;
- Commitments to continuing students; and
- Size of faculty research groups and ability to support new students.

2. Merit Awards to Incoming Master's Students

A number of financial awards are available to admitted Master's students in the form of fellowships, research awards, scholarships, and travel stipends. Such awards include:

a. Fellowships

The University offers full and partial fellowships to "outstanding" incoming Master's students. Some of the fellowships are offered in partnership with a private company. The fellowships do not specify the criteria for regarding a student as "outstanding." However, one of the fellowships, the Dean's Master's Fellowship, requires that a student satisfy specific GPA and/or GRE requirements to be eligible.

b. Scholarships

The University informed OCR of merit-based scholarships awarded to "outstanding" applicants of any full-time engineering Master's program interested in conducting research at the Biomimetic MicroElectronic Systems Engineering Research Center. Scholarships are awarded to incoming Master's students demonstrating "academic excellence" and "strong promise" in the field of research.

The University did not specify the criteria for regarding an applicant as "outstanding," or for having "academic excellence," or "strong promise."

c. Travel Stipends

The University provides travel stipends for “well-qualified” students to visit the campus and/or attend recruitment events. Students are required to apply for a travel stipend. The University did not specify the criteria for regarding applicant to be considered “well-qualified.” During the entire review period there were 48 travel stipends awarded to prospective students of which 40 were given to males and 8 to females. Females received 20% of the travel stipends which is slightly higher than the female admission rate of approximately 17% during the review period.

Depending on the award, the EE department may nominate applicants to the MAPP Office or the MAPP Office may identify worthy candidates. According to the University, selections are made by the MAPP Office based on academic GPA, GRE scores, schools previously attended, personal statement, and previous research experience and performance.

3. Merit Awards to Incoming Ph.D. Students

According to the University, financial aid is awarded on a competitive basis for each fall semester, and all Ph.D. applicants are eligible for consideration. Such awards include fellowships awarded by the University, the VSOE, the EE department, a partnership with a private entity, “top-off” awards, scholarships, teaching assistantships, research assistantships, and travel stipends. Faculty in the department review the applications and select applicants they would like the department to nominate for University and School fellowships and the associate chair working with a faculty committee ranks them in order of merit, taking into consideration the needs of all of the departments’ research areas and groups. There is no separate fellowship application. A faculty committee appointed by the Vice Provost for Graduate Programs reviews the nominees for University awards and recommends its selections to the Vice Provost for her final decision. Viterbi School award recipients are selected by a panel of Viterbi deans from the ranked lists submitted by the departments.

The University explained that applicants to the M.S. program are not ranked, and that Ph.D. applicants are ranked only for the purpose of nominating students for fellowships. According to the University, the main reason for ranking is that all fellowship nominations require ranked lists of candidates. Each research group in the department ranks its candidates based on academic records, research experience, area of interest, and needs within the research group.

Findings and Recommendations

Incoming M.S. and Ph.D. students may be offered a variety of incentive awards in order to encourage a student to accept admission to a graduate EE program. The University provided general information, but did not provide specific criteria considered for each award, the nomination process, or how students were ranked when determining whether an incentive award would be offered. Also, we do not know the number of male and females considered for each award. Without this information, it is difficult to evaluate whether discrimination on the basis of sex occurred, insofar as recruitment incentive awards go.

All students receiving the same award receive the same benefits. This means that the tuition and/or health benefits and/or stipend paid to the student receiving the Annenberg Fellowship, for example, is the same for all Annenberg Fellowship recipients.

The review revealed no evidence of discrimination on the basis of sex insofar as the VSOE and Ming Hsieh Department of Electrical Engineering's recruitment and outreach events and activities are concerned. More information is needed regarding incentive awards before an evaluation can be made.

The Department should look closely at the ranking results provided by faculty for consideration of awards. Perhaps the Department already reviews these rankings for gender bias in assignment of higher rankings but OCR was unable to verify this as information was not submitted for review.

4. Achievement Awards for Continuing Students

a. Fellowships

As discussed and evaluated in the Recruitment Incentive section above, a wide range of graduate student fellowships are awarded by the University each year to "outstanding" applicants. There are also many outside organizations that provide full or partial fellowships for graduate students at USC.

b. Teaching and Research Assistantships

Financial aid in terms of teaching and research assistantships are typically only available to Ph.D. students. The University and those interviewed as part of the review, stated that in order to obtain a Research Assistantship (RA), the student usually initiates contact with a faculty member involved in a particular research project to indicate his or her interest. If the faculty member has an RA position available, then he or she typically reviews the student's academic performance to determine if there would be a good match. None of

the subjects interviewed felt that a student's gender played a role in the selection of a research assistantship.

Students interested in Teaching Assistantships (TA) apply online each semester. Instructors for each class review the applications and recommend a student whom he/she feels is qualified. Afterward, the Associate Chair, in coordination with faculty and student affairs staff, assign TAs for each class. Factors considered are the student's progress in the Ph.D. program, recommendations made by instructors, and the student's prior performance as TAs. Students who have received fellowships and are making good progress in the Ph.D. program are guaranteed some form of assistantship from the Department in years 3 and 4.

Masters students who have entered an M.S. EE program without financial aid, can apply for positions as teaching assistants, graders, and/or research assistants. These positions, however, are highly competitive and typically awarded to Ph.D. students.

c. Achievement Awards

Although perhaps not technically considered financial aid, students have an opportunity to receive a variety of achievement awards. A review of each award's criterion, application, nomination, and evaluation process showed no evidence of gender disparity. Below is a summary of the awards given during the five year period under review.

	2006-2007		2007-2008		2008-2009		2009-2010		2010-2011	
AWARD	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Annenberg Fellowship	0	0	9	2	16	4	27	4	30	9
Annenberg Fellowship + WISE	0	0	0	0	0	1	0	0	0	0
Chevron Ph.D.	0	0	0	0	1	0	1	0	1	0
Provost's Fellowship	0	0	20	6	23	4	14	4	19	7
Tuition only Award	0	0	0	0	1	0	0	0	0	0
Summer Internship Stipends	16	3	13	1	21	1	13	1	0	0
Top-off to NSF Research Fellowship	2	0	0	0	0	1	0	0	0	0
Top-off+Supplemental Award to Minority	0	0	0	0	0	0	0	0	2	1
Top-off to 50% Assistantship	0	0	0	0	0	0	0	0	3	0
Travel Reimb. for campus visit	0	0	9	1	13	1	6	18	Not available	Not available
Viterbi Dean's Ph.D. Merit Fellowships	0	0	6	1	10	5	8	5	8	6
WISE Award	0	0	0	1	0	3	0	1	0	1

Findings and Recommendations

DOE found no evidence suggesting gender-disparity in the award of most types of financial assistance to students such as fellowships, or in the selection process for TA and RA positions. For instance, the Annenberg Fellowship awards totaled 101 during the review period with 82 male awards and 19 female awards. Also, the Provosts Fellowship awards totaled 97 during the review period with 78 male awards and 21 female awards. Female awards were roughly 20% of the total awards which is slightly higher than female enrollment rate of approximately 18%. However, the award of summer internships to females was only 10% of the total with males receiving 68 total internships and females receiving only 6 internships over the five-year period.

The Department should invest effort to address the discrepancy in the award of summer internships to females. Also, the Department should look closely at the ranking results provided by faculty for “outstanding” students to be given awards. Perhaps the Department already reviews these rankings for gender bias in assignment of an “outstanding” rank but OCR was unable to verify this because this information was not submitted for review.

E. Steps to Completion of a Graduate Degree in Electrical Engineering

DOE Title IX implementing regulations state that “no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient” of financial assistance. 10 C.F.R. § 1042.400. The Department evaluated USC’s administration of all processes related to the award of a Masters and Ph.D. degree in electrical engineering to determine whether they comply with this general provision of nondiscrimination on the basis of sex.

M.S. students must defend a thesis before a guidance committee composed of two faculty members from the major department and one other faculty member in order to complete their degree. At the defense, the student presents the research he/she performed and the results and conclusions reached. Final acceptance (approval) is based upon the unanimous recommendation of all members of a student’s guidance committee. The committee may recommend additions and edits until they are satisfied that the work is a serious, considerable, and publishable piece of work demonstrating the writer’s power of original thought, thorough grasp of the subject matter, and ability to present material in a scholarly manner and style. During the period reviewed, 100% of the theses presented by students were approved.

In addition to coursework and research requirements in the EE degree program, a candidate must satisfactorily complete an engineer’s qualifying examination administered by the candidate’s guidance committee. The examination contains both an oral and written component, and is normally taken during the last semester of course work toward the degree.

There are three major steps to completion of the Ph.D. degree in EE-Systems after admission to the Ph.D. program: Screening Exam, Qualification Exam, and Dissertation Defense. According to the University, the typical timeline for completing these requirements is 1.5 years to screening, 1.5 years to qualification, and another 1.5 years to defense.

1. Screening Exam

The purpose of the screening examination is to determine whether a student has the background and ability to enter a Ph.D. program and to conduct original research of quality suitable for the Ph.D. degree. Students must pass the screening examination in one chosen specialty area of electrical engineering offered by the University. The form of the examination differs among the areas, and may include written and/or oral components. The examinations are created and graded by electrical engineering faculty. Grading criteria for the examinations are based on merit, and measured by a student's performance on the components of the examination.

a. Screening Exam for the Electrical Engineering-Systems Ph.D. Program in Electrical Engineering or Computer Engineering

Students entering the EE-Systems Ph.D. program in EE or CENG with either a B.S. degree or an M.S. degree are required to pass the Ph.D. Screening Exam. Students are allowed two attempts to pass the screening examination, and must pass the screening examination no later than two years (four regular academic year semesters) from the student's date of admission into the Ph.D. program, regardless of the number of units completed. The screening examination is intended to gauge research potential; therefore other evidence of a student's potential for research work, including GRE scores and the student's USC GPA, in addition to the examination grade are considered when making a pass/fail decision. A student is eligible to take the screening examination only if his/her cumulative graduate GPA at USC is 3.5 or higher.

b. Electrical Engineering-Electrophysics Graduate Screening Exam

The EE-EP Graduate Screening Exam is a mandatory examination for all Ph.D. candidates. Its primary purpose is to assure a minimum level of proficiency with Electrical Engineering matters, and is the basis of a student's recommendation for formal acceptance into the Ph.D. program.

An average minimum GPA of 3.5 is required in the Graduate Screening Exam core courses. Students are also required to attend EE-EP workshops and seminars during his/her graduate study program. A student is only allowed to take each core course once.

Once a student has signed up for the Graduate Screening Exam, he/she must complete the exam within three semesters (or, if the student was officially admitted into the EE Ph.D.

program, then he/she must complete the screening examination within three semesters of his/her admission date). Exceptions to this rule are made at the discretion of the Graduate Screening Exam committee.

Students may only take the EE-EP Graduate Screening Exam once. If a student does not pass the Graduate Screening Exam, then he/she will receive a terminal Master's degree.

c. Screening Exam Pass Rates

The University provided Screening Examination pass rate statistics for the period under review. The statistics show that the pass and fail rates are about the same for both male and female students. During the period reviewed, 40 females took the Screening Examination for the first time; 31 (78%) passed and nine (22%) failed. During the same time period, 210 males took the Screening Examination for the first time; 155 (74%) passed and 55 (26%) failed.

During the time period reviewed, seven females took the Screening Examination a second time; five (71%) passed and two (29%) failed. During the same time period, 37 males took the Screening Examination for the second time; 25 (68%) passed and 12 (32%) failed.

2. Qualifying Exam

Qualifying Examinations are intended to determine the extent of a student's knowledge in basic science and engineering areas as well as the ability to do original and scholarly research. Students usually take the examination during the last semester of the second year of graduate study or, at the latest, in the fifth semester or equivalent.

A guidance committee of faculty, selected by the Ph.D. candidate, decides the nature of the qualifying examination. The guidance committee is composed of a chair, who is the candidate's primary faculty thesis advisor, and a minimum of four additional faculty. The guidance committee includes a faculty member from outside of EE to represent the graduate school and ensure that proper procedures were followed.

According to the University, the qualifying examination may include a research paper review and critique, an examination in course material, and the preparation of a written thesis proposal describing the candidate's research topic, background, preliminary research work, and a plan for future research. The research proposal is presented orally by the candidate to the guidance committee.

After a student takes the qualifying examination, the guidance committee: 1) informs the candidate that they have passed the examination and allows them to continue their research to complete the Ph.D. requirements; 2) informs the candidate that they have not passed, but offers the candidate a re-examination within the time limits as set by the Graduate School; or 3) informs the candidate that their Ph.D. degree objective should be terminated.

According to the University, the criteria for these decisions is the merit of the candidate's proposed research program, their progress to date, and the likelihood that their continued research will result in their meeting all the requirements for the Ph.D. degree.

a. Qualifying Exam Pass Rates

The University provided Qualifying Examination pass rate statistics for the period under review. The statistics show that 100% of the Ph.D. students that took the Qualifying Examination passed so there was no gender discrepancy.

3. Doctoral Dissertation and Defense

Ph.D. candidates are required to conduct a dissertation before a dissertation committee. A student's dissertation must be based on original investigation, and must demonstrate his or her mastery of a special field, capacity for independent research, and a scholarly result.

After a student has successfully completed all requirements, including his or her dissertation, the Ph.D. candidate must pass a general final oral examination devoted to the major field and to the topic of the dissertation. During the oral exam, the student must demonstrate to the dissertation committee that he or she has attained a level of scholarly advancement and power of investigation demanded by the University to receive a Doctoral degree. Unanimous approval of the committee is required for the student to proceed to final typing of the dissertation.

Findings and Recommendations

DOE reviewed the policies, procedures, and grading methods related to the screening examination, qualifying examination, and dissertation defense requirements and found no evidence of bias or gender-disparity in the manner in which the examinations were administered or graded. Nor did DOE find evidence of gender-disparity in the pass rates between male and female students. Therefore, the Department finds that the University's administration of the oral candidacy examination, the dissertation defense, and the dissertation approval process for Masters and Ph.D. students complies with the nondiscrimination requirements of Title IX and DOE Title IX implementing regulations.

However, we note that strict rules on the time limit for completing and/or passing the screening exams may have a disproportionate adverse impact on females. Students entering the EE-Systems Ph.D. program in EE or CENG must pass the screening examination no later than two years (four regular academic year semesters) from the student's date of admission into the Ph.D. program, regardless of the number of units completed. The policies do not state whether exceptions to this rule can be made. Similarly, students entering the EE-EP Ph.D. program must complete the screening

examination within three semesters (or, if the student was officially admitted into the EE Ph.D. program, then he/she must complete the screening examination within three semesters of his/her admission date). Exceptions to this rule are made only at the discretion of the Graduate Screening Exam committee.

Presumably, a student will gain education and experience by taking certain graduate-level classes, which prepares them for successfully completing the screening exam. Many females who are in the Ph.D. programs are in their child-bearing years. If a female decides to have a child during the first three to four semesters of her Ph.D. education and takes a LOA, she may not have the opportunity to take the necessary courses that prepare her for passing the screening examination. Thus, strict time limits imposed on taking and/or passing a screening examination, could have a disproportionate adverse impact on females.

The Department recommends that the University review its policies on the time limits for taking the screening and qualifying examinations and take action to alleviate the disproportionate adverse impact having strict time limits may have on female students.

F. Campus Environment

1. Academic Climate

As noted previously, DOE Title IX implementing regulations state that “no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient” of financial assistance. 10 C.F.R. §1042.400. Consistent with this provision, the Department evaluated the academic climate within USC Departments, as well as campus safety, to determine whether either of these environmental aspects had the effect of excluding USC students from participation in USC programs or activities on the basis of their sex.

The review included student questionnaires consisting of 27 questions covering several areas including the recruitment, admissions, financial aid, and the degree award process. Students were also asked for their thoughts on gender relations on campus, campus climate including safety, and whether the Department was family friendly.

Many of the students who were interviewed said they did not believe one’s sex had any effect on the interaction between professors and students. It was their observation that the dynamics among students, and between professors and students, were positive.

Most of the students interviewed stated that they had little or no occasion to interact with their program Chair, but felt that the Chairs would be accessible if the need arose.

2. Faculty

At the time of the review, the Ming Hsieh Department of Electrical Engineering had 71 total faculty within its 11 graduate programs of which 5 were female which equals 7% of the total. During the interview process, DOE learned from the University that with the assistance of a \$20 million endowment received by the University in 2000 to create Women In Science and Engineering (WISE), the Ming Hsieh Department of Electrical Engineering was able to attract and nearly triple its number of female faculty. Twelve faculty members (4 females and 8 males) were interviewed as part of the review. Fourteen University administrators, including several Department Chairs, were also interviewed.

3. Gender Bias/Sexual Harassment

The students who were interviewed stated that gender did not affect any aspect of their studies. Faculty members also made similar statements. A majority of the students interviewed said they had not observed or heard of any case of sexual harassment or gender bias. The University stated that within the VSOE and Ming Hsieh School of EE, there were no incidents sexual harassment reported during the period under review.

4. Campus Safety

DOE conducted a review and analysis of campus safety features because females are more often the victims of violence than males. The intent of DOE is to determine whether campus safety features offer the same protection for females as they afford males. Those interviewed stated that they felt the campus was safe, but that its surrounding urban neighborhood was not. Nevertheless, most of the students interviewed informed DOE of several safety measures taken by the University, and that they used the public safety services offered by USC.

USC Public Safety Officers provide 24-hour law enforcement services on the University Park and Health Sciences campuses, as well as in surrounding neighborhoods. USC Campus Cruisers provide after-dark escorts by foot, bicycle, or car, for students whose destination is within the University Patrol area. USC also works closely with the Los Angeles Police Department.

5. Child Care

The University operates a child care facility on campus that provides child care for 199 children from the ages of infant to 12 years old. USC provides subsidized childcare for full-time students and faculty. The subsidy provided by the University brings the cost to students and faculty to approximately 50% of the market rate cost for child care.

Findings and Recommendations

The University has developed extensive and efficient programs for ensuring campus safety for everyone. Additionally, the on-campus child care center provides convenience and affordability for students and faculty and can ease the transition of new parents to return to school and work after a parental leave. DOE finds these programs to be in compliance with Title IX requirements.

G. Title IX Procedures, Practices, and Compliance

Title IX requires educational institutions that are recipients of Federal financial assistance to develop and implement nondiscrimination policies and procedures, and to appoint a Coordinator for implementing and coordinating Title IX functions. DOE's implementing regulations, 10 C.F.R. Section 1042.140(b), require recipients to adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints that allege actions prohibited by Title IX. The U.S. Department of Justice (DOJ) recommends that grievance procedures include both an informal and a formal process, and also provide complainants with information on their right to file a discrimination complaint with an appropriate Federal agency, if there is no satisfactory resolution of the complaint.[†]

Pursuant to Title IX, each recipient of Federal financial assistance must notify students and employees of the name, office address, and telephone number of the employee or employees appointed to coordinate and administer its Title IX grievance process. This information should be disseminated through newspapers and magazines operated by the recipient, and by memoranda or other written communication distributed to each student and employee. The recipient is required to prominently place a statement of its policy of nondiscrimination on the basis of sex in each announcement, catalog, or application form that it makes available to students and employees or which is otherwise used in connection with the recruitment of students and employees. 10 C.F.R. Section 1042.135 to 140.

1. Designation of a Title IX Coordinator

DOE Title IX implementing regulations require each recipient of financial assistance to designate at least one employee to coordinate its efforts to comply with and to carry out its responsibilities under Title IX and DOE Title IX implementing regulations. 10 C.F.R. §1042.135 (a).

The University has designated the Executive Director of the Office of Equity and Diversity (OED) as its Title IX Coordinator responsible for (among other functions): monitoring compliance with federal equal opportunity and affirmative action regulations, including Title IX; receiving, investigating, and resolving complaints of discrimination and harassment, including Title IX-related complaints; implementing, publicizing, and

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

monitoring the University's equal opportunity and affirmative action policies and procedures; and educating students, staff, and faculty about their rights and responsibilities under federal equal opportunity regulations, such as Title IX.

2. Notification Requirements

DOE Title IX implementing regulations require each recipient of financial assistance to notify all of its students and employees of the name, office address, and telephone number of the individual it has designated as the Title IX coordinator. 10 C.F.R. § 1042.135(a). DOE Title IX implementing regulations also require each recipient of financial assistance to implement specific and continuing steps to notify applicants for admission, students, and employees "that it does not discriminate on the basis of sex in the educational programs or activities that it operates, and that it is required by Title IX and (DOE) Title IX regulations not to discriminate in such a manner." 10 C.F.R. § 1041.140(a) (1). In addition, each recipient is required to prominently include a statement of its nondiscrimination policy on the basis of sex in each announcement, bulletin, catalog, or application form that it makes available to applicants for admission, students, and employees, or which is otherwise used in connection with the recruitment of students or employees. 10 C.F.R. § 1042.140 (b) (1).

DOE reviewed the University's website and several announcements, catalogs, and applications to see whether the University, VSOE, and the Ming School of EE have notified students and employees of their policies concerning non-discrimination on the basis of sex. DOE also reviewed whether students and employees have been informed of the Title IX Coordinator's identity and how to file a complaint.

According to the University, all staff and faculty receive training, either on-line or in person, regarding Title IX, and also Title VII and other matters of harassment and discrimination. Training is conducted both within the first sixty days of each employee's hire, and also every two years throughout the University. Students are notified through trainings, student publications, and materials available to students on-line. Additional training is provided for those involved in the Title IX compliance processes. Most of the students and faculty interviewed as part of the review confirmed they had received sexual harassment training.

DOE's review of the University's website observed that the University has several notices published throughout its website, which inform students and employees that discrimination on the basis of sex and sexual harassment is prohibited under various statutes, including Title IX. The non-discrimination policy is not listed on the University's home page. However, a simple search of the key word, "discrimination," on the University's home page leads users to numerous places where the University's non-discrimination policies are published, as well as the identity and contact information of the Title IX Coordinator, the existence of the OED, procedures on how to file a complaint, and a description of the Title IX investigation and grievance process.

The first link provided after searching with the key term, “discrimination,” leads users to the University’s non-discrimination policy, which is listed on USC’s online Catalogue. Within that publication, is a link to the OED. The OED’s webpage provides a comprehensive list of the University’s non-discrimination policies. It also provides a link to complaint forms and explains in detail, the process that begins when a complaint is filed. OED’s webpage also speaks about policies and procedures concerning sexual harassment.

VSOE’s webpage for Students describes the school’s equal opportunity employer and educator policy. It also includes a link to the University’s webpage called “SCampus Student Guidebook,” and opens directly to the University Governance page, which state the University’s non-discrimination policies. The non-discrimination policies clearly identify where to file a complaint, as well as the Title IX Coordinator’s identity and contact information. SCampus’ University Governance page provides an extensive list of University standards, policies, and procedures concerning discrimination, sexual harassment, and how to file complaints (as well as a host of other standards, policies, and procedures, related to other forms of discrimination and student conduct). The page is informative and easy to navigate. The University’s Graduate School webpage also contained a brief non-discrimination policy at the bottom, along with a link to the University’s full non-discrimination policy.

USC’s application for admission to Graduate School is an online process. Part 2 of the on-line application process has a non-discrimination policy located at the bottom of the webpage. Insofar as DOE could observe, the applications for entrance into one of the graduate EE programs, did not contain information on the University’s non-discrimination policies related to Title IX.

DOE also reviewed a number of on-line and printed materials, such as publications provided by the VSOE and Ming Hsieh Department of EE, which are used for outreach and recruitment purposes. With the exception of the Admissions & Financial Aid material, none of the documents provided by the University had a statement related to non-discrimination on the bases of sex (nor other non-discrimination statements).

Most of those interviewed as part of the compliance review were generally, but not specifically, aware of Title IX insofar as it relates to non-discrimination on the basis of sex. A majority of the students who were interviewed were unaware of the Title IX Coordinator’s identity, but felt confident that they would be able to determine who to file a complaint with if the need arose. Similarly, most faculty members who were interviewed did not know the identity of the Title IX Coordinator, but stated they would escalate receipt of any complaints to their superiors, administrators, or the OED.

Since the time of the interview portion of the compliance review, the University has taken, or is in the process of taking measures specifically aimed at informing students and employees of Title IX requirements, the identity and contact information of the Title IX Coordinator, and the process for filing a complaint. Such measures include adding a Title IX component to student and new faculty orientation, training for graduate students and

TAs, creating video trainings, posting Title IX information in the University newspaper, and creating posters with Title IX information, to name a few.

3. Title IX Complaint Procedures

DOE Title IX implementing regulations require recipients of financial assistance to adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints related to Title IX. 10 C.F.R. § 1042.135(b). Since Title IX prohibits sex discrimination and sexual harassment, such grievance procedures must provide for the prompt and equitable resolution of sex discrimination and sexual harassment complaints.

Any student, faculty, or staff who believes they have been harmed by sexual harassment or discrimination and harassment on the basis of sex committed by faculty or staff member(s) may file a complaint with the OED.[†] The OED investigates such complaints. Persons who believe they are a victim of sex discrimination or sexual harassment are encouraged to use the University's internal complaint process. The Title IX/Discrimination Complaint form also informs individuals that they may file with the Equal Employment Opportunity Commission, the U.S. Department of Labor Office of Civil Rights, or the California Department of Fair Employment and Housing[‡]. The complaint form does not state that a person can file a complaint with the federal funding agency.

The Graduate School also has designated the Graduate Student in Residence as a peer advocate for USC graduate students. The Graduate Student in Residence can provide help to students who have problems and conflicts with faculty, program administration, or academic evaluations and assist a student to informally resolve such conflicts. However, allegations of sexual harassment and violations of academic integrity fall under the jurisdiction of the OED, The Center for Women and Men, and the Student Judicial Affairs Community Standards.

According to the University, if a student, faculty, or staff person feels that he or she has been sexually harassed, or discriminated against because of his/her sex, they may contact the OED to schedule an appointment to speak with an investigator, and to fill out a complaint form. The University does not consider a complaint as official until an investigator has conducted an interview. After the interview, the investigator and/or the OED will determine if an investigation is warranted, and will advise the complainant whether the complaint has been accepted for investigation. In some cases, a complaint may be referred to a more appropriate office for handling if it does not fall within the purview of the OED.

Once an investigation is accepted, the respondent is allowed to answer the allegations. In most cases, the respondent's Chair or supervisor is informed of the allegations, and the

^{††} Complaints being made about sexual harassment, stalking, and retaliation committed by students are handled by the Center for Women and Men.

Dean or Vice President of the appropriate school or department is advised of the complaint.

According to the University, complaints are investigated by reviewing relevant documents, interviewing relevant witnesses, and viewing other relevant evidence. All faculty, staff and students are required to cooperate in the investigative process and are prohibited from retaliating against anyone who has brought forth a complaint, or against anyone who has participated as a witness in an investigation by the OED. The University strives to complete investigations within 45 days from the date of an intake interview, absent extenuating circumstances.

Designated individuals, including the complainant, respondent, Executive Director of Equity and Diversity, Associate Senior Vice President for Human Resources (in cases against staff) and the Provost (in cases against faculty) are notified of the status of ongoing investigations. When appropriate, the OED will also notify supervisors and the senior vice president of the administrative unit or the dean.

The OED uses a “preponderance of the evidence” standard for determining whether university policies against harassment and discrimination have been violated. This means that, if the investigator finds it is more likely than not that the alleged misconduct occurred, the investigator will conclude that there was a violation of university policy. Once a decision is made, the OED sends to both the complainant and respondent a letter with a brief summary of the facts and findings, reason for the decision, and legal standard applied.

If the OED determines that there is an insufficient basis to conclude that harassment, discrimination, sexual harassment, threats or actual retaliation occurred, the investigation is closed.

If the OED determines there is a sufficient basis to conclude that a *staff* member committed harassment, discrimination, sexual harassment, threats or actual retaliation, the Associate Senior Vice President for Human Resources issues a written ruling stating the disciplinary action to be imposed and any other corrective action the university will take. Copies of this ruling are given to the complainant and to the respondent. Disciplinary actions imposed on a respondent must take effect no sooner than 10 business days after he or she has received a copy of the ruling, unless the Associate Senior Vice President for Human Resources determines that immediate action is necessary.

If the OED determines there is a sufficient basis to conclude that a *faculty* member committed harassment, discrimination, sexual harassment, threats or actual retaliation, the Vice Provost or a person authorized to act on the Vice Provost’s behalf issues a written ruling stating the disciplinary action that will be imposed and any other corrective action the University will take. Copies of the ruling are given to the complainant and to the respondent. Disciplinary actions imposed on a respondent must take effect no sooner than 10 business days after he or she has received a copy of the ruling, unless the Vice Provost determines that immediate action is necessary.

4. Appeal Process

For complaints handled by a Senior Investigator, the complainant may appeal an “insufficient basis” finding by written appeal to the Executive Director of the Office of Equity and Diversity. For complaints investigated by the Executive Director, the complainant may appeal an “insufficient basis” finding by written appeal to the Associate Senior Vice President for Human Resources. Appeals must be received within 15 business days of the date on the insufficient basis finding.

With regard to disciplinary action against *staff*, the respondent may file a written appeal before 10 business days have elapsed with the Senior Vice President for Administration. He or she must reply to the appeal within 10 business days of receipt, notifying the respondent of the decision either upholding or overturning the ruling of the Associate Senior Vice President for Human Resources. The appeal process does not delay imposition of disciplinary action against a staff employee.

With regard to disciplinary action against *faculty*, the respondent may file a written appeal before 10 business days have elapsed with the Vice Provost. The University’s complaint appeal procedures also include notice to complainants that they also have the right to file a complaint of discrimination and/or harassment with appropriate federal agencies, including the U.S. Department of Education’s Office of Civil Rights, the U.S. Equal Opportunity Commission, and the California Department of Fair Employment and Housing.

Findings and Recommendations

Based on information provided by the University, and on information published on the University’s website, we find that the school has met the basic Title IX requirements of having a Title IX Coordinator and posting notice of her contact information. However, a majority of those interviewed, were not aware of the Title IX Coordinator’s identity.

With regard to Title IX procedures we find that the University has adopted and published grievance procedures providing for the prompt and equitable resolution of student and employee complaints that allege actions prohibited by Title IX. We note that although the University has established timeframes for completing an investigation, no timeframe has been established for the acceptance or dismissal of a Title IX complaint.

DOE did not conduct an on-campus visit, and therefore, is not aware of what information is posted around campus concerning Title IX. We recommend that Title IX notices be published in the EE facilities and (throughout the University), which state the non-discrimination policies, procedures for filing a complaint, and Title IX Coordinator contact information. We also recommend that students, faculty, and staff be informed that they may also file a complaint that alleges actions prohibited by Title IX with the federal agency that provides funding. In addition, we recommend that the University

publish Title IX non-discrimination statements on outreach and recruitment materials. Finally, the University should develop a timeframe for the acceptance or dismissal of a complaint for investigation.

H. Sexual Harassment and Sex Discrimination Policies

DOE regulations implementing Title IX, at 10 C.F.R. Part 1042, require that recipients adopt policies against sex discrimination in their programs and activities. In addition, DOE implementing regulations also require that recipients develop procedures that provide a mechanism for discovering sexual harassment and sex discrimination as early as possible, and for effectively correcting problems of sexual harassment and sex discrimination.

1. University Policy on Sexual Harassment

The University has an established policy against sexual harassment, which is generally published in the same avenues and manner as the University's non-discrimination policies and statements. In addition, information about sexual harassment, and the University's policies, procedures, and complaint processes concerning sexual harassment, are found in the Faculty Handbook and Graduate Assistant Handbook.

The University has also developed a sexual harassment awareness program and has implemented regulations, procedures, and practices for discouraging sexual harassment and for processing complaints of sexual harassment. According to the University, all employees are required to take sexual harassment training on a periodic basis, and failure to complete the training can result in disciplinary action. Most of those interviewed as part of the review, stated they had received some form of sexual harassment training by the University. None of the witnesses interviewed were aware of any incidents of sexual harassment.

2. Preventive Measures

In addition to establishing its sexual harassment policy and complaint procedures, and sexual harassment training for employees, the University has developed other sexual harassment preventive measures. In particular, the University's Center for Women and Men helps organize and participates in events aimed at raising sexual harassment and sexual violence awareness. Such measures include events like "Take Back the Night", which is a week-long event to raise awareness about sexual violence. The University has also developed fliers, which explain what sexual harassment is, that it is prohibited, and where a person may file a complaint. The University also has pamphlets available to students and employees, which were created by the California Chamber of Commerce, and which explain sexual harassment, California and Federal law concerning sexual harassment, and local, state, and federal avenues for filing a complaint.

The University undertakes multiple self-evaluations to further gender equity in salary and promotions of staff and faculty, a couple of these are: 1) The Deans of each school review faculty salaries every year for gender equity, those salaries are then reviewed by the Provost's office. If gender discrimination concerns are identified, these would then be referred to the Office of Equity and Diversity; and 2) As part of the University's Affirmative Action plan reviews, staff and faculty salaries are reviewed for gender equity as are issues surrounding promotion, hiring, retention, and terminations.

Finding and Recommendations

The policies, procedures, and practices adopted by the University for discouraging sexual harassment and for processing complaints of sexual harassments are within the standards established by Title IX and DOE implementing regulations. Additionally, DOE commends USC for its extensive training efforts related to Title IX and the prohibition against sex discrimination and sexual harassment that is standard procedure for incoming students, faculty and staff as well as its annual efforts to review faculty salaries for gender equity.

III. Conclusion

The Department finds that the VSOE and the Ming Hsieh Department of Electrical Engineering have met the basic requirements of Title IX and DOE's implementing regulations. However, the DOE identified some policies which could result in a disproportionate adverse impact on females, and has identified some areas of the University's Title IX compliance efforts, which could be improved. Therefore, DOE recommended that the University take the following actions in a draft report that was provided in July 2016. Upon receipt, the University reviewed the recommendations and provided the following bulleted responses in November 2016.

- A. Recommendation #1: Conduct an internal review of the admissions processes for its graduate EE programs which have significantly higher admission rates for one sex over the other to determine whether parts of the admission policies, procedures, and/or selection criteria are more favorable to one sex than the other.
 - University Response: The School and the Department have conducted continual reviews and audits of their admissions process since 2011 in order to understand the effects of their recruitment efforts and admissions standards upon its entering student populations. Since 2011, the School's efforts to increase representation of women have been noticed on a national scale, including earning the distinction of being named US News & World Report's #1 Graduate Engineering Program with the Most Women in 2015.
 - University Response: All applications to the Department are comprehensively reviewed based on faculty-set parameters,

including overall academic performance, major-specific academic performance, and test scores. All applications are reviewed within the context of the current applicant pool. Additional outreach and support is provided to applicants by the Center for Engineering Diversity to students traditionally under-represented in engineering, including women.

B. Recommendation #2: Review its policies related to its Childbirth & Adoption Accommodation Program (and its admission deferment policies as they relate to pregnancy, childbirth, and adoption) to see if there is a way to alleviate the adverse impact those policies may have on females.

- University Response: This program and associated admission deferment policies have been extensively reviewed since 2011 and have moved towards greater flexibility over the years. The University will continue to review and adjust these policies as appropriate in an effort to reduce any adverse impact on students or applicants based on gender or other protected class statuses. The parental leave program at USC is very successful, and has helped 127 Ph.D. students over the last eight semesters, including in the Fall 2016.
- University Response: Furthermore, Ph.D. students can still take one semester of funded parental leave, and may supplement that with up to four semesters of leave absence on approval. Additional time may be requested beyond the four-semester leave through the central Graduate School, at which point a review will be conducted to determine the appropriateness and feasibility of a longer leave, considering such factors as the student's and department's academic plans, changes in coursework, relevance of completed coursework, the student's career goals, alternative options, etc.

C. Recommendation #3: Review the award process of summer internships to prospective graduate students for gender bias because males received 90% of internships during the review period.

- University response: Our summer research programs are widely announced across all institutions in part to encourage women and other under-represented groups to apply. During the selection process special attention is given to candidates that are women and or are from under-represented minority groups to ensure they are given adequate consideration and are fairly represented in the selections. Since 2011, female participation has increased dramatically in the Summer Research programs. In 2014, 2015, and 2016, women accounted for 28%, 33%, and 33% of the respective cohort groups with 18 total student participants each year.

D. Recommendation #4: Review its policies on the time limits for taking the screening and qualifying examinations and take action to alleviate the disproportionate adverse impact having strict time limits may have on female students.

- University response: Screening and qualifying exams have been reviewed and analyzed since 2011, and the practices and postponement of these exams are very flexible so as to avoid any unnecessary burdens or adverse impacts on women. Our Doctoral students regularly petition for extra time for screening and qualifying exams and these requests are routinely approved. Additionally, the Department will undertake a process to explicitly notify all students of the availability and flexibility of this petition process, particularly as it relates to matters of health and wellness, including pregnancy and childbirth.

E. Recommendation #5: Title IX notices be published in the EE facilities and (throughout the University), which state the non-discrimination policies, procedures for filing a complaint, and Title IX Coordinator contact information.

- University response: The USC Title IX Office is currently going through a process of rebranding and implementing new awareness campaign materials and websites. As part of this process, the Office will review its use and dissemination of Title IX and non-discrimination notices in employee and student facilities.

F. Recommendation #6: Students, faculty, and staff should be informed that they may also file a complaint that alleges actions prohibited by Title IX with the federal agency that provides funding.

- University response: The University's Student Misconduct policy indicates that, in addition to filing a complaint with the Title IX Office, individuals may file complaints with the state or federal government, including the Equal Employment Opportunity Commission, Office for Civil Rights with the U.S. Department of Education, and California Department of Fair Employment and Housing. USC will continue to review all complaint and investigation-related materials to ensure all parties are fully informed of their rights and options.

G. Recommendation #7: Publish Title IX non-discrimination statements on outreach and recruitment materials.

- University response: The University will review its online and hard-copy admissions materials to determine where and how Title IX non-discrimination statements may be included in those materials.

H. Recommendation #8: Establish a timeframe for the acceptance or dismissal of a complaint for investigation.

- University response: The University continuously reviews its complaint and investigation processes to ensure best practices, including the use of specific timeframes at various stages of the complaint and investigation processes which at a minimum meet statutory requirements. Additionally, the University has a goal to complete the investigation process (including issuing sanctions) within 60 days. Extensions are granted at the discretion of the Title IX Coordinator for good cause.
- The University has a liberal reporting period which does not limit the time frame for reporting prohibited conduct. However, to promote timely and effective review, the university strongly encourages individuals to report prohibited conduct as soon possible as a delay in reporting may impact the ability to collect relevant evidence.

With the additional steps taken since the 2011 Title IX Compliance Review was conducted, the DOE finds the Ming Hsieh Department of Electrical Engineering at USC to be in compliance with the requirements of Title IX of the Education Amendments of 1972, contained in 20 U.S.C. 1681, and DOE's implementing regulations at 10 C.F.R. 1040 and 1042.