

NATIONAL SCIENCE FOUNDATION
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**OFFICE OF
DIVERSITY AND INCLUSION**

August 14, 2020

Via Electronic Mail Only

Dr. F. King Alexander
President
Oregon State University
President's Office
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Corvallis, OR 97331
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Dear President Alexander:

The Office of Diversity and Inclusion (ODI) of the National Science Foundation (NSF) is pleased to issue the final version report (the Final Report) for the civil rights compliance review conducted of Oregon State University's (Oregon State's) College of Earth, Ocean, and Atmospheric Sciences (CEOAS). A copy of the Final Report is enclosed for your records.

NSF conducted this review pursuant to Title IX of the Education Amendments of 1972 (Title IX), as amended, 20 U.S.C. Section 1681, et seq., and the NSF implementing regulations, 45 C.F.R. Parts 611 and 618. The regulations authorize NSF to conduct periodic reviews of educational institutions that receive financial assistance from NSF in order to ascertain compliance with Title IX and NSF regulations.

The scope of the review was to determine whether students in CEOAS have equal access to opportunities and benefits offered by Oregon State, and an evaluation of the Oregon State's policies and procedures related to the requirements of Title IX. ODI staff interviewed students, faculty, and other University officials during a three-day campus site visit on May 15-17, 2018. This site visit also included a visit to CEOAS's fleet of research vessels at the Hatfield Marine Science Center's Ships Operations facility in Newport, Oregon. Additionally, ODI reviewers analyzed and evaluated statistical data and other information provided by CEOAS and the University's Equal Opportunity and Access Office as well as publicly available information from the Oregon State's website. NSF provided Oregon State and CEOAS a draft compliance review report on December 2, 2019 with an opportunity to comment on the facts and findings detailed in the report. Oregon State provided NSF its response to the draft report in a letter dated February 21, 2020. The Final Report includes revisions prompted by several of the comments and suggested revisions in Oregon State's response to the draft report.

Based on all the information gathered during the review, including the information Oregon State provided us in its February 21, 2020 response to the draft report, NSF concludes that Oregon State and CEOAS are in compliance with Title IX with respect to issues within the scope of the compliance review as detailed above. However, we encourage Oregon State and CEOAS to implement all the recommendations contained in the Final Report. With the issuance of the Final Report, ODI is closing this compliance review as of the date of this letter.

We wish to thank the students, faculty, and administrators of Oregon State and CEOAS for their cooperation throughout the course of the review and for the follow-up documentation which the University provided to complete our review.

If you have any questions regarding this report, please contact Mr. Robert (Bob) Cosgrove, NSF Awardee Compliance Program Manager, at 202-292-5310, or via email at rcosgrov@nsf.gov. You can also contact me at 703-292-8020 or at rjdavis@nsf.gov.

Sincerely,



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TITLE IX COMPLIANCE REVIEW REPORT

Oregon State University College of Earth, Ocean, and Atmospheric Sciences

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I. Introduction

The Office of Diversity and Inclusion (ODI) of the National Science Foundation (NSF) conducted a Title IX compliance review of the graduate program of the College of Earth, Ocean, and Atmospheric Sciences (CEOAS) at Oregon State University (the University or OSU) in May 2018. ODI conducted the review pursuant to Title IX of the Education Amendments of 1972 (Title IX), as amended, 20 U.S.C. Section 1681, *et seq.*, and the NSF's Title IX implementing regulations, 45 C.F.R. Part 618.¹ During the course of the compliance review, NSF requested and obtained data from the University and gathered data from the University's website. On May 15-17, 2018, members of the ODI's compliance review team held on-campus interviews with University administrators, including the University's Title IX Coordinator, students, faculty, and staff of CEOAS. The facts, findings, and recommendations contained in this report are based on a review and an analysis of the data obtained from the University, including the University's website, as well as information obtained from the interviews held with students, faculty, staff, and administrators.

NSF provides funds to more than 1,900 colleges, universities, and non-profit institutions supporting approximately 300,000 researchers, postdoctoral fellows, trainees, teachers and students each year.

OSU is a public research university located in Corvallis, Oregon with approximately 32,000 students and 18 percent of this number are graduate students. The Carnegie Foundation classifies OSU as a doctoral university with a status of "Highest research activity". OSU is one of 73 land-grant universities in the United States and is also one of only three U.S. institutions that in addition to the land-grant university designation, is also designated as a sea-grant, space-grant, and sun-grant institution. In FY 18, OSU received the second highest amount of total NSF research funding among universities and was the leading university recipient of NSF geoscience research funding. In FY 18, OSU received \$123,207,644 in NSF research awards and cooperative agreements. CEOAS offers undergraduate degree programs in Climate Science, Environmental Sciences, Geography and Geospatial Science. CEOAS also offers graduate degree programs in Geology, Geography, Marine Resource Management; Ocean, Earth, and Atmospheric Sciences.

A. Background

Title IX and NSF's 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); 45 C.F.R. § 400.

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

¹ NSF Implementing regulations (45 CFR Part 618.605, incorporating by reference the NSF Title VI regulation at 45 C.F.R. 611.7 require that NSF conduct compliance reviews. NSF commits to conducting two Title IX compliance reviews annually of NSF awardee organizations.)

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 the conduct of complaint investigations and the provision of 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 National Science Foundation, the GAO recommended that NSF ensure that compliance reviews of grantees are periodically conducted.

B. Objective

The objective of the Title IX compliance review at OSU was three-fold: (1) to determine whether male and female applicants and students had equal access to the opportunities and benefits offered by the graduate program of CEOAS; (2) to determine whether the University was in compliance with the requirements of Title IX and NSF Title IX implementing regulations; and (3) to identify and report on any promising practices instituted by the University for promoting gender equity.

C. Scope

At the University, ODI elected to review the undergraduate and graduate components of CEOAS. To determine whether undergraduate and graduate applicants and students, regardless of their sex, had equal access to the opportunities and benefits offered by CEOAS, ODI evaluated the following areas and practices of CEOAS: (1) student enrollment; (2) recruitment and outreach efforts; (3) admissions policies; (4) leave of absence and re-enrollment policies; (5) financial assistance opportunities; (6) graduate examination and writing requirements; (7) the academic climate; and (8) student safety.

To determine whether the University was in compliance with the requirements of Title IX, and NSF Title IX implementing regulations, ODI evaluated the following: (1) whether the University has designated a Title IX Coordinator; (2) whether the University has taken continuing steps to notify the campus community about its nondiscrimination policies related to Title IX; and (3) whether the University has adopted and published grievance procedures providing for the prompt and equitable resolution of Title IX-related complaints, including sex discrimination and sexual harassment complaints.

II. Recruitment and Outreach

NSF Title IX implementing regulations prohibit recipients of financial assistance from discriminating on the basis of sex in the recruitment of students. 45 C.F.R. § 618.310. Many if not most colleges and universities across the United States engage in a variety of recruitment activities with the goal of enrolling the students they recruit. To determine whether CEOAS followed this provision, ODI reviewed the recruitment and outreach activities of the CEOAS.

A. Recruitment and Outreach Activities

The University participates in many recruitment and outreach activities on behalf of CEOAS.

Table 1-Annual Recruitment/Outreach Activities

Recruitment and Outreach Activities		
Activity Sponsor	Outreach/ Recruitment Activity Description	Student Population
Office of Admissions	Prospective Student Programs Student Ambassadors Program	Undergraduate Undergraduate
Office of Student Services	National College Fair Salmon Bowl/Ocean Bowl	Undergraduate Undergraduate
CEOAS Advisors	One-on-One Appointments Tours and Class Visits	Undergraduate Undergraduate
Unknown	Audio and Video Segments Graduate Student Spotlight Flyers Graduate Student Themed Highlight Booklets	Graduate Graduate Graduate
CEOAS	Graduate Students Participation in local, regional, national, and international conferences and workshops. Geological Society of America-Sponsored Booth Association of American Geographers-Sponsored Booth American Geophysical Union-Sponsored Booth Society for the Advancement of Chicanos and Native Americans in Science-Sponsored Booth	Graduate Graduate Graduate Graduate
CEOAS Advisors	Individual Potential Student Campus Visits	Graduate*

*=Top candidates for admission are provided a stipend to partially offset travel and lodging.

Highlights: While NSF did not review OSU’s or CEOAS’s admissions or recruitment practices with respect to race, color or national origin discrimination in this review, NSF notes the University’s efforts to recruit a diverse graduate student body through engagement with various professional organizations that target minority populations and have strong representation of female students. However, some students expressed concerns about the lack of racial diversity in

the CEOAS and OSU student population and therefore may not feel as welcome. OSU informed NSF that OSU's Office of Institutional Diversity conducts a biennial campus climate survey. NSF cautions that the use of stipends as a tool to attract top candidates must be monitored to ensure that it is being provided in a fair and equitable manner, devoid of discriminatory practices. NSF recommends that CEOAS regularly evaluate the recruitment and admissions experiences of its applicants to ensure a fair and equitable process.

FINDING: In Compliance

III. Admissions

NSF Title IX implementing regulations prohibit recipients of financial assistance from discriminating on the basis of sex in the admission of applicants. 45 C.F.R. § 618.300. In determining whether a person satisfies a criterion for admission, or in making any offer of admission, recipients are prohibited from the following: giving preference to one person over another on the basis of sex; applying numerical limitations upon the number or proportion of persons of either sex who may be admitted; or otherwise treating one individual differently from another on the basis of sex. *Id.*

A. University Admissions Policies and Procedures

Undergraduate students apply directly through the standard OSU application. If the individual meets the general admissions criteria, they are admitted to OSU into the major chosen on their application. There are no additional requirements for entry into the College.

Graduate applicants complete an online application form that requires GRE scores, undergraduate transcripts, letters of recommendation, a personal statement, resume/cv and any additional items of support the applicant would like to provide. A Graduate Admissions Committee, whose purpose is to administer the application process, is appointed by the Dean of each College and consists of faculty members from each degree program. This committee supervises the evaluation of applications and provides direction regarding the recruitment, selection, and admissions process. The coordination of the selection process, specifically the early matching of applicants with advisors and a scheduled campus visit, increases the likelihood that an applicant will matriculate.

Highlights: NSF observes that the OSU admissions policies and criteria appear to be neutral, fair, and valid predictors of success. NSF recommends that all forms of evaluation be standardized to reduce the influence of unconscious bias in the admissions process.

FINDING: In compliance

B. CEOAS Specific Admissions

The CEOAS criteria that are evaluated for admissions include GPA, GRE score, advising support from specific CEOAS faculty members, demonstrated excellence in undergraduate

research, quality of professional experience, composition of personal statement, and merit of the candidate as expressed through the letters of recommendation.

Highlights: NSF observes that the CEOAS admissions policies and criteria appear to be neutral, fair, and valid predictors of success. NSF recommends that all forms of evaluation be standardized to reduce the influence of unconscious bias in the admissions process.

FINDING: In compliance

C. Applicant-Admitted-Matriculated Data

Tables 2 -9 below, show the number and percentage of students by gender, who applied to the undergraduate and graduate CEOAS programs from the 2013-14 to 2017-18 academic years. The tables also show the number and percentage of male and female applicants who were admitted to the respective graduate programs, as well as the number and percentage of male and female applicants who matriculated in the program for the same time period.

Table 2-OEAS Ph.D. Applicant-Admitted-Matriculated Data

OEAS Ph.D. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	83	36	43%	47	57%
	No. Admitted	13	6	46%	7	54%
	No. Matriculated	8	4	50%	4	50%
2014-2015	No. of Applicants	93	48	52%	45	48%
	No. Admitted	14	7	50%	7	50%
	No. Matriculated	11	6	55%	5	45%
2015-2016	No. of Applicants	71	40	56%	31	44%
	No. Admitted	11	3	27%	8	73%
	No. Matriculated	3	3	100%	0	0%
2016-2017	No. of Applicants	80	36	45%	44	55%
	No. Admitted	12	4	33%	8	67%
	No. Matriculated	4	1	25%	3	75%
2017-2018	No. of Applicants	88	52	59%	36	41%
	No. Admitted	18	4	22%	14	78%
	No. Matriculated	9	2	22%	7	78%

Table 3-OEAS M.S. Applicant-Admitted-Matriculated Data

OEAS M.S. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	64	31	48%	33	52%
	No. Admitted	10	4	40%	6	60%
	No. Matriculated	2	1	50%	1	50%
	No. of Applicants	51	28	56%	23	44%

2014-2015	No. Admitted	4	2	50%	2	50%
	No. Matriculated	4	2	50%	2	50%
2015-2016	No. of Applicants	49	23	47%	26	53%
	No. Admitted	9	6	67%	3	33%
	No. Matriculated	8	5	63%	3	37%
2016-2017	No. of Applicants	50	22	44%	28	56%
	No. Admitted	7	5	71%	2	29%
	No. Matriculated	6	4	67%	2	33%
2017-2018	No. of Applicants	46	20	43%	26	57%
	No. Admitted	10	5	50%	5	50%
	No. Matriculated	7	3	43%	4	57%

Table 4- Geology Ph.D. Applicant-Admitted-Matriculated Data

Geology Ph.D. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	39	24	62%	15	38%
	No. Admitted	5	3	60%	2	40%
	No. Matriculated	3	1	33%	2	67%
2014-2015	No. of Applicants	59	28	47%	31	53%
	No. Admitted	13	7	54%	6	46%
	No. Matriculated	6	5	83%	1	17%
2015-2016	No. of Applicants	60	32	53%	28	47%
	No. Admitted	11	3	27%	8	73%
	No. Matriculated	8	1	13%	7	87%
2016-2017	No. of Applicants	52	29	56%	23	44%
	No. Admitted	6	4	67%	2	33%
	No. Matriculated	3	3	100%	0	0%
2017-2018	No. of Applicants	58	32	55%	26	45%
	No. Admitted	9	6	67%	3	33%
	No. Matriculated	4	3	75%	1	25%

Table 5-Geology M.S. Applicant-Admitted-Matriculated Data

Geology M.S. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	83	49	59%	34	41%
	No. Admitted	11	4	36%	7	64%
	No. Matriculated	8	3	38%	5	62%
2014-2015	No. of Applicants	86	48	56%	38	44%
	No. Admitted	4	2	50%	2	50%
	No. Matriculated	3	2	67%	1	33%
2015-2016	No. of Applicants	82	44	54%	38	46%
	No. Admitted	2	1	50%	1	50%

	No. Matriculated	4	3	75%	1	25%
2016-2017	No. of Applicants	84	47	56%	37	44%
	No. Admitted	8	4	50%	4	50%
	No. Matriculated	5	2	40%	3	60%
2017-2018	No. of Applicants	58	30	52%	28	48%
	No. Admitted	8	4	50%	4	50%
	No. Matriculated	8	4	50%	4	50%

Table 6- Geography Ph.D. Applicant-Admitted-Matriculated Data

Geography Ph.D. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	21	18	86%	3	14%
	No. Admitted	7	5	71%	2	29%
	No. Matriculated	6	4	67%	2	33%
2014-2015	No. of Applicants	28	14	50%	14	50%
	No. Admitted	6	1	17%	5	83%
	No. Matriculated	2	0	0%	2	100%
2015-2016	No. of Applicants	16	10	63%	6	37%
	No. Admitted	3	3	100%	0	0%
	No. Matriculated	1	1	100%	0	0%
2016-2017	No. of Applicants	38	21	55%	17	45%
	No. Admitted	9	7	78%	2	22%
	No. Matriculated	6	5	83%	1	17%
2017-2018	No. of Applicants	26	12	46%	14	54%
	No. Admitted	4	2	50%	2	50%
	No. Matriculated	4	2	50%	2	50%

Table 7- Geography M.S. Applicant-Admitted-Matriculated Data

Geography M.S. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	17	6	35%	11	65%
	No. Admitted	3	0	0%	3	100%
	No. Matriculated	1	0	0%	1	100%
2014-2015	No. of Applicants	37	23	62%	14	38%
	No. Admitted	8	5	63%	3	37%
	No. Matriculated	4	3	75%	1	25%
2015-2016	No. of Applicants	37	19	51%	18	49%
	No. Admitted	7	4	57%	3	43%
	No. Matriculated	3	1	33%	2	67%
2016-2017	No. of Applicants	36	16	44%	20	56%
	No. Admitted	5	3	60%	2	40%
	No. Matriculated	3	1	33%	2	67%

2017-2018	No. of Applicants	45	24	53%	21	47%
	No. Admitted	11	7	64%	4	36%
	No. Matriculated	7	5	71%	2	29%

Table 8-MRM M.S. Applicant-Admitted-Matriculated Data

MRM M.S. Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	39	10	26%	29	74%
	No. Admitted	15	2	13%	13	87%
	No. Matriculated	13	2	15%	11	85%
2014-2015	No. of Applicants	42	10	24%	32	76%
	No. Admitted	13	6	46%	7	54%
	No. Matriculated	11	4	36%	7	64%
2015-2016	No. of Applicants	31	8	26%	23	74%
	No. Admitted	10	3	30%	7	70%
	No. Matriculated	9	2	22%	7	78%
2016-2017	No. of Applicants	36	7	19%	29	81%
	No. Admitted	11	2	18%	9	82%
	No. Matriculated	8	2	25%	6	75%
2017-2018	No. of Applicants	31	7	23%	24	77%
	No. Admitted	11	3	27%	8	73%
	No. Matriculated	10	2	20%	8	80%

Table 9-CEOAS Undergraduate Applicant-Admitted-Matriculated Data

CEOAS Undergraduate Applicant-Admitted-Matriculated Data						
		Total	Male		Female	
		#	#	%	#	%
2013-2014	No. of Applicants	664	340	51%	324	49%
	No. Admitted	420	202	48%	218	52%
	No. Matriculated	178	81	46%	97	54%
2014-2015	No. of Applicants	638	291	46%	347	54%
	No. Admitted	388	157	40%	231	60%
	No. Matriculated	185	74	40%	111	60%
2015-2016	No. of Applicants	816	390	48%	426	52%
	No. Admitted	468	210	45%	258	55%
	No. Matriculated	198	82	41%	116	59%
2016-2017	No. of Applicants	983	435	44%	548	56%
	No. Admitted	580	249	43%	331	57%
	No. Matriculated	251	100	40%	151	60%
2017-2018	No. of Applicants	1017	417	41%	600	59%
	No. Admitted	634	249	39%	385	61%
	No. Matriculated	305	115	38%	190	62%

Highlights: NSF notes the increase in female applicants to the undergraduate and graduate programs and except for one graduate program, there are no disparities that raise concern between the admissions rates of male and female students. With respect to the OEAS graduate program, NSF found that the data provided by CEOAS revealed that the number of admitted PhD male students is significantly lower than for female students over three straight academic years (2015-16 through 2017-18). However, OSU informed NSF in their response to a draft version of this report on February 21, 2020 that admissions rates were “fairly equal” between men and women more recently in FY 2018-19 and 2019-20. OSU further explained the disparity found by NSF by noting that the OEAS program is one of the most competitive within CEOAS and admits very few students overall as it comprised of four specialty areas and admissions decisions for each specialty area are made by a separate admissions review group. According to OSU, this means that four separate admissions review groups’ decisions contribute to the aggregate number of students admitted for OEAS. Additionally, faculty who serve on the review groups rotate frequently. ODI has determined that OSU has sufficiently explained the presence of the disparity is not due to discrimination on the basis of sex.

FINDING: In Compliance

IV. Financial Assistance

NSF Title IX implementing regulations state that in providing financial 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. 45 C.F.R. § 618.430. ODI evaluated the different types of financial assistance made available by the respective Departments to its students, including financial recruitment incentives, to determine compliance with this provision.

Undergraduate Students

CEOAS offers scholarships for undergraduate students. Students must complete the application, which require faculty nomination, by the end of the winter term to be considered for a scholarship. Student Services staff compile student GPA and relevant performance data and provide them to the academic program committees for review. Selection of awardees for College-level awards occurs through a committee evaluation process. For awards limited to a specific academic program, a standing committee of at least three faculty evaluate each candidate.

Graduate Students

CEOAS offers fellowships, teaching assistantships, and research assistantships for graduate students. External fellowships are coordinated between the applicant’s advisor and CEOAS Leadership. Candidates for fellowships and teaching assistantships are decided upon by the Graduate Admissions Committee. Research assistantships are determined by the individual Principal Investigator, in consultation with the Program Head and Graduate Student Office. Once funding is available, Teaching Assistantships are assigned based on student expertise, course demands, faculty request, and availability.

Highlights: CEOAS students, faculty and staff interviewed by NSF did not inform NSF of any discrimination or bias based on gender in the University’s policies or practices with respect to the award or distribution of financial assistance between male and female students. Nevertheless, NSF recommends that CEOAS regularly evaluate the selection process of its applicants for financial awards to ensure a fair and equitable process where there is no adverse impact based on the student’s gender.

FINDING: In Compliance

A. Financial Assistance by Degree and Gender

Tables 10-CEOAS Ph.D. Financial Assistance

CEOAS Ph.D. Financial Assistance Totals				
	Male		Female	
	\$	%	\$	%
2013-2014	17,017	56%	13,200	44%
2014-2015	12,946	51%	12,500	49%
2015-2016	16,373	44%	20,800	56%
2016-2017	11,500	44%	14,600	56%
2017-2018	2,500	47%	2,800	53%

Table 11-CEOAS M.S. Financial Assistance

CEOAS M.S. Financial Assistance Totals				
	Male		Female	
	\$	%	\$	%
2013-2014	6,000	29%	14,900	71%
2014-2015	8,300	39%	12,900	61%
2015-2016	5,300	34%	10,300	66%
2016-2017	25,270	74%	8,850	26%
2017-2018	0	0%	2,100	100%

Table 12-CEOAS Undergraduate Financial Assistance

CEOAS Undergraduate Financial Assistance Totals				
	Male		Female	
	\$	%	\$	%
2013-2014	12,999	38%	20,834	62%
2014-2015	17,250	55%	14,216	45%
2015-2016	19,667	62%	11,934	38%
2016-2017	10,649	33%	21,566	67%
2017-2018	12,000	40%	18,056	60%

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDING: In Compliance

B. Positions by Gender

Table 13- Assistantship Positions by Gender

CEOAS									
		Fellowship		RA		TA		Total	
		#	%	#	%	#	%	#	%
2013-2014	M	8	62%	28	49%	18	44%	54	49%
	F	5	38%	29	51%	23	56%	57	51%
2014-2015	M	6	46%	24	47%	22	48%	52	47%
	F	7	54%	27	53%	24	52%	58	53%
2015-2016	M	7	47%	25	49%	25	44%	57	46%
	F	8	53%	26	51%	32	56%	66	54%
2016-2017	M	9	39%	25	46%	18	47%	52	45%
	F	14	61%	29	54%	20	53%	63	55%
2017-2018	M	7	47%	24	43%	20	50%	51	46%
	F	8	53%	32	57%	20	50%	60	54%

Note. M stands for Male and F stands for Female.

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDINGS: In Compliance

V. Student Enrollment, Retention and Degree Completion

The NSF Title IX implementing regulations at 45 C.F.R. 618.400 provide 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. To determine whether CEOAS followed this provision, ODI reviewed the student enrollment policies, procedures, and data of CEOAS.

CEOAS Graduate Program Policies

Minimum Course Loads: Course load requirements for graduate students are established by the Registrar and the Graduate School. A student is considered a “full-time” graduate student if he or she is registered for 9–16 credits in a given academic term. A student is considered a “part-time” graduate student if he or she has less than nine credits. Degree-seeking students must be registered for a minimum of three graduate credits in any term to be enrolled and access university resources, including the term of the final defense. Students are responsible for staying

current on course load requirements that may supersede the Graduate School requirements (i.e., international, financial aid, veterans).

Continuous Graduate Enrollment: All graduate students enrolled in a degree program must register continuously for a minimum of 3 graduate credits each term (fall, winter, and spring terms) until all degree requirements are met, regardless of student’s location. Students on approved leave or who are pursuing a certificate are exempt from the continuous enrollment policy for the term(s) they are on leave. Graduate students who use facilities or faculty/staff time during summer session are required to register for a minimum of 3 credits during the summer session. Students defending in the summer term are required to register for a minimum of 3 graduate credits. Students may appeal the provisions of the continuous graduate enrollment policy if extraordinary circumstances arise by submitting a detailed request in writing to the Dean of the Graduate School.

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDING: In Compliance

A. CEOAS Enrollment Data Comparison

Table 14- Geography Ph.D. Enrollment Data Comparison

Geography Ph.D. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	21	11	52%	10	48%
2014-2015	16	7	44%	9	56%
2015-2016	10	5	50%	5	50%
2016-2017	12	8	67%	4	33%
2017-2018	14	8	57%	6	43%

Table 15- Geography M.S. Enrollment Data Comparison

Geography M.S. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	10	7	70%	3	30%
2014-2015	10	7	70%	3	30%
2015-2016	10	4	40%	6	60%
2016-2017	9	3	33%	6	67%
2017-2018	11	6	55%	5	45%

Table 16- Geology Ph.D. Enrollment Data Comparison

Geology Ph.D. Enrollment					
	Total	Male		Female	
	#	#	%	#	%

2013-2014	28	18	64%	10	36%
2014-2015	21	14	67%	7	33%
2015-2016	30	17	57%	13	43%
2016-2017	23	12	52%	11	48%
2017-2018	22	11	50%	11	50%

Table 17- Geology M.S. Enrollment Data Comparison

Geology M.S. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	12	4	33%	8	67%
2014-2015	14	7	50%	7	50%
2015-2016	11	6	55%	5	45%
2016-2017	8	4	50%	4	50%
2017-2018	14	7	50%	7	50%

Table 18- OEAS Ph.D. Enrollment Data Comparison

OEAS Ph.D. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	53	27	51%	26	49%
2014-2015	47	22	47%	25	53%
2015-2016	45	22	49%	23	51%
2016-2017	39	18	46%	21	54%
2017-2018	39	16	41%	23	59%

Table 19- OEAS M.S. Enrollment Data Comparison

OEAS M.S. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	18	11	61%	7	39%
2014-2015	11	7	64%	4	36%
2015-2016	17	9	53%	8	47%
2016-2017	16	10	63%	6	37%
2017-2018	15	8	53%	7	47%

Table 20- MRM M.S. Enrollment Data Comparison

MRM M.S. Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	29	10	34%	19	66%
2014-2015	27	7	26%	20	74%
2015-2016	25	6	24%	19	76%

2016-2017	21	7	33%	14	67%
2017-2018	23	7	30%	16	70%

Table 21- CEOAS Undergraduate Data Comparison

CEOAS Undergraduate Enrollment					
	Total	Male		Female	
	#	#	%	#	%
2013-2014	507	249	49%	258	51%
2014-2015	493	234	47%	259	53%
2015-2016	523	246	47%	277	53%
2016-2017	573	269	47%	304	53%
2017-2018	609	251	41%	358	59%

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDING: In Compliance

B. CEOAS Degree Completion Rates (Master/PhD)

Table 22-Geography Degree Completion Rates (Master/PhD)

GEOGRAPHY DEGREE COMPLETION RATES						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	4	3	75%	1	25%
	Ph.D.	1	0	0%	1	100%
2014-2015	M.S.	6	3	50%	3	50%
	Ph.D.	7	4	57%	3	43%
2015-2016	M.S.	5	3	60%	2	40%
	Ph.D.	5	1	20%	4	80%
2016-2017	M.S.	4	2	50%	2	50%
	Ph.D.	2	1	50%	1	50%
2017-2018	M.S.	5	2	40%	3	60%
	Ph.D.	0	0	0%	0	0%
TOTAL	M.S.	24	13	54%	11	46%
	Ph.D.	15	6	40%	9	60%

Table 23-Geology Degree Completion Rates (Master/PhD)

GEOLOGY DEGREE COMPLETION RATES						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	2	0	0%	2	100%

	Ph.D.	8	5	63%	3	37%
2014-2015	M.S.	3	2	67%	1	33%
	Ph.D.	2	2	100%	0	0%
2015-2016	M.S.	7	2	29%	5	71%
	Ph.D.	2	1	50%	1	50%
2016-2017	M.S.	1	1	100%	0	0%
	Ph.D.	7	6	86%	1	14%
2017-2018	M.S.	3	2	67%	1	33%
	Ph.D.	4	2	50%	2	50%
TOTAL	M.S.	16	7	44%	9	56%
	Ph.D.	23	16	70%	7	30%

Table 24-OEAS Degree Completion Rates (Master/PhD)

OEAS						
DEGREE COMPLETION RATES						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	11	5	45%	6	55%
	Ph.D.	7	4	57%	3	43%
2014-2015	M.S.	8	6	75%	2	25%
	Ph.D.	6	4	67%	2	33%
2015-2016	M.S.	5	3	60%	2	40%
	Ph.D.	8	3	38%	5	62%
2016-2017	M.S.	9	3	33%	6	67%
	Ph.D.	6	2	33%	4	67%
2017-2018	M.S.	3	3	100%	0	0%
	Ph.D.	11	5	45%	6	55%
TOTAL	M.S.	36	20	56%	16	44%
	Ph.D.	38	18	47%	20	53%

Table 25-MRM Degree Completion Rates (Master)

MRM						
DEGREE COMPLETION RATES						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	9	2	22%	7	78%
2014-2015	M.S.	9	4	44%	5	56%
2015-2016	M.S.	15	4	27%	11	73%
2016-2017	M.S.	8	1	13%	7	87%
2017-2018	M.S.	10	4	40%	6	60%
TOTAL	M.S.	51	15	29%	36	71%

Table 26-CEOAS Undergraduate Completion Rates

CEOAS Undergraduate						
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DEGREE COMPLETION RATES						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	Bachelors	111	54	49%	57	51%
2014-2015	Bachelors	111	59	53%	52	47%
2015-2016	Bachelors	116	51	44%	65	56%
2016-2017	Bachelors	108	57	53%	51	47%
2017-2018	Bachelors	104	56	54%	48	46%
TOTAL	Bachelors	550	277	50%	273	50%

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDING: In Compliance

B. Leave of Absence and Re-Enrollment Policies

As previously stated in this section, NSF 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 that receives federal financial assistance.” 45 C.F.R. § 618.400. ODI evaluated CEOAS’s leave of absence, re-enrollment, and maternity/paternity leave policies to determine whether they comply with this general provision of nondiscrimination on the basis of sex.

Undergraduate Planned Educational Leave Program: The Undergraduate Planned Educational Leave Program (PELP) is a one time, voluntary, temporary, planned interruption or pause in a student’s regular, full-time education to enhance the prospect of successful completion of an academic program. The cost is a \$25 non-refundable application fee and the absence may be for as many as six consecutive regular academic terms (not including summer terms). The PELP is designed to allow a student to pursue other activities that will assist them in clarifying their educational goals, such as job opportunities and experiences away from campus, military deployment, time to resolve personal or medical problems, or other similar pursuits. The University considers a student’s current academic standing and any existing student conduct issues prior to approving the voluntary PELP leave request. OSU informed NSF that In addition to guaranteeing readmission after the leave, the other value of PELP is a guarantee that a student can return to school using the same catalog year that they left under, therefore, ensuring their academic program requirements did not change from when they first attended.

CEOAS Graduate Program Leave of Absence Policy: Leave of Absence status is available to eligible students who need to suspend their program of study for good cause. The time the student spends on approved leave will be included in any time limits prescribed by the university relevant to degree completion. Students on approved leave may not use any university facilities, make demands upon faculty time, receive a fellowship or financial aid, or take course work of any kind at Oregon State University. Leave of Absence/Intent to Resume Graduate Study Forms

must be received by the Graduate School at least 15 working days prior to the first day of the term involved. Family Medical Leave (FML) may be granted at any point during a term.

Highlights: NSF observes no pattern of gender-based discrimination based on the information provided to the agency.

FINDING: In Compliance

VII. Academic Climate

A. Family Friendly Policies

Paid Parental Leave for Academic and Professional Faculty: The Paid Parental Leave Policy for academic and professional faculty at Oregon State University went into effect on September 1, 2017. This policy provides eligible employees with 60 hours paid parental leave upon the birth or adoption of a child to care for and bond with their newborn or newly adopted child.

Employees are eligible if they are academic or professional faculty who have an appointment of .50 Full Time Equivalency or greater, have been employed for at least 180 days, and have gained a child through birth or adoption. This policy enhances the existing benefit of paid and unpaid leave programs: accrued sick leave; advance of unused sick leave; vacation leave; and leave provided by the Family and Medical Leave Act and the Oregon Family Leave Act. Paid parental leave is to provide a birth mother, biological father, spouse, domestic partner, or adoptive parent with paid time off to care for and bond with a newborn or newly adopted child. Paid parental leave is paid at 100% of the employee's regular rate of pay. Paid parental leave is not available for the adoption of a spouse's or domestic partner's children. Parental leave provides a paid leave benefit that may be combined with other leave programs to maximize the length of paid leave available for use during FMLA or OFLA, in the event of a birth or the adoption of a child.

Departments should be flexible in managing parental leave requests, so as to permit eligible employees to effectively manage career and family responsibilities. Workload issues should be proactively managed so that excessive demands are not placed on the remaining faculty and staff. Any unused paid parental leave balance remaining after 18 weeks following the birth or adoption will be forfeited. This leave may be used in the cases of stillbirth. The employee may be required to reimburse the university the paid parental leave benefit paid under this policy if the employee fails to return to work after the expiration of this leave and/or any other authorized leave period or returns, but fails to remain actively at work for at least 30 days.

Graduate Assistant Family Medical Leave Policy: All eligible Graduate Assistants² on a current assistantship may take up to 12 weeks of a continuous block of leave from their appointment as parental leave or to care for their own serious health condition or that of a family member. OSU will continue to pay for their health insurance during this leave period at the same level it would pay as if they had not taken leave. For parental leave, Graduate Assistants may take advantage of this leave policy once per new child. For all other leave due to a serious health condition of the eligible Graduate Assistant or their family member, only one leave may be granted during their tenure at OSU. Intermittent leave periods are not available under this

² OSU informed NSF that graduate assistants who have been employed for one full academic year or more are considered eligible

policy, although eligible Graduate Students may opt to take less than the full twelve-week period of leave. One parental leave period will be shared by both parents if they are both entitled to family medical leave (by law or policy) from a position at OSU, although the distribution of the leave between the parents (100% by one parent, 50-50 between parents, etc.) is at the discretion of the parents. A leave taken under this policy does not extend a Graduate Assistant's contractual appointment. In other words, if a Graduate Assistant's appointment ends during a leave period, the eligible Graduate Assistant's position and leave period end at the same time.

Highlights: OSU's provision of 60 hours paid family leave to faculty at 100% salary, as well as 12 weeks of continuous family leave can be considered a best practice. NSF observes no pattern of gender-based discrimination based on the information provided to the agency.

FINDINGS: In Compliance

B. Classroom, Laboratory and Field/Remote Site Experiences

NSF examined whether there was nondiscrimination on the basis of sex in CEOAS classrooms, laboratories, field sites and research vessels. Since sexual and gender harassment at remote field sites is of great concern in the scientific community, this review focused on field sites and research vessels operated by OSU and CEOAS. CEOAS faculty conduct research in dozens of field sites around the world. CEOAS also conducts a number of undergraduate [courses](#) devoted to field site research at locations in Oregon and California. CEOAS operates two research vessels out of the CEOAS [Ship Operations](#) facility located at the Hatfield Marine Science Center in Newport, Oregon, the R/V [Oceanus](#) and the R/V [Elakha](#). CEOAS is also the lead institution in the design and construction of the next [Regional Class Research Vessel](#), funded by NSF.

This review revealed that CEOAS has provided sexual harassment, nondiscrimination and anti-bias training to research vessel personnel, including the shipboard researchers and the standing crew. OSU provided NSF copies of training material that are provided to shipboard personnel. The CEOAS Marine Superintendent at the time of the onsite informed NSF that this training is provided and ship personnel must review the Sexual Harassment Policy 2.4 contained in the OSU Ship Operations [Safety Management Manual](#) (OSU provided excerpt dated last revision 5/31/19) and confirm via signature that have read the policy. NSF's review of the latest version of this manual revealed that contact information for the US Departments of Education and Labor are provided if they wish to file sexual harassment complaints, but not the address for ODI. OSU needs to provide ODI contact information in this manual. NSF toured each vessel and confirmed that signage and posters are posted in each vessel, which detail the sexual harassment incident reporting process, includes contact information if incidents occur at sea.

Undergraduate Interviews: After reviewing the undergraduate interviews, there were no repeated themes that stood out indicating sex discrimination or sexual/sex-based harassment. There were no personal experiences or observed gender discrimination or harassment reported in the program at this time by the undergraduate students. The students believed that CEOAS was generally supportive of students' parenting responsibilities. Most of the students described their experiences with respect to gender dynamics in the lab, classroom, field work sites and other research vessels as positive. However, many of the undergraduate students interviewed by NSF

when asked about their understanding of Title IX did not have a clear understanding of Title IX and did not know what OSU office was responsible for implementing sexual misconduct and discrimination policies. About half of the students had attended a sexual harassment or sexual awareness training at the University or elsewhere.

Graduate Student Interviews: NSF notes the following information offered during graduate student interviews:

- Most of the graduate students indicated that they chose OSU because of the expert faculty in various research areas, previous associations on research projects, and program research offerings.
- Based on the responses recorded, the majority of the students understood Title IX and only a few students indicated that they did not know or had to research it before the compliance review.
- Most of the students indicated that they did not know who or what office was responsible for implementing the Title IX-related policies on campus, had not personally experienced or observed gender discrimination or harassment in the program, and would go to their research advisor or graduate program director to report sexual misconduct. Only a few students indicated that they would go outside of CEOAS to report or address sexual misconduct.
- There was no significant trend in awareness of any subtle gender biases in the programs observed or experienced by most of the students.
- An overwhelming number of the students described their relationship with their advisor as very effective and positive. For the most part, the students described the climate in the CEOAS as very welcoming toward women.
- Many of the students believe that the ratio of men and women in classes did not have a negative impact on student learning outcomes.
- When asked to describe their experience as far as gender on study or research teams, including fields trips, most of the students believed that there is equal access to equipment and other resources, that women were given the same opportunities as men, and there was equity in the participation of men and women in assignments.
- Students also indicated that generally there were no issues of sexual or gender-based harassment or discrimination at CEOAS field sites or on research vessels. Several interviewees did reference a now former CEOAS faculty member, who was a PI on several NSF awards, as having engaged in sexual or sex-based harassment that was under investigation by OSU's Office of Equal Opportunity and Access (EOA) at the time of the onsite review.
- In describing their experience with high stakes (e.g., Qualifying, Candidacy, Comprehensive) exams, there were no major outliers indicating gender bias in the exam process. Students perceived the process as fair to both men and women.
- Most of the students had taken part in a sexual awareness or sexual assault training at the university. Training is required and takes place during the Teaching Assistant orientation. Some of the students participated in an online training. The responses varied regarding if the training was mandatory or voluntary.
- Most of the students were not familiar with the university's policies on childbearing and parental status or resources available for students with children but believe that CEOAS was supportive of students' parenting responsibilities.

- Most of the students were not aware of any improper or no response by OSU or CEOAS to allegations of sexual harassment.

Post- Doctoral (Postdoc) Research Associate Interviews: There were no significant outliers that repeatedly stood out from the postdocs that were interviewed. There were a few observations of perceived bias/stereotypes made by postdocs. The observations were that “students assumed that guys are better with carrying the manual labor and the women taking notes; and that older faculty tend to have more bias issues than the younger faculty.” However, it was reported that biases tend to be expressed less often as older faculty retire and younger faculty are hired. Postdocs informed NSF that despite such incidents, the CEOAS climate as welcoming toward women and a good place to work. CEOAS was also described as generally supportive of postdocs’ parenting responsibilities and the university had resources available for post-docs who have children.

Faculty Interviews: faculty interviews revealed the following:

- There were mixed views regarding the changes faculty have seen in terms of female participation (not just in overall numbers, but in areas of interest or specific participation, e.g., program areas). Most faculty members indicated that they have seen increased changes in the number of junior female faculty hires, a few female administrators’ hires, and an increase in female graduate students.
- Most of the faculty had a general idea of what office was responsible for implementing the University’s Title IX policies and coordination. When asked what they would do if approached with a Title IX-related issue, the responses varied from talking to the Dean, calling the EOA office, accessing the EOA online site, to sending an email to appropriate University officials. Most of the faculty assumed the same process applied in remote settings as well.
- Faculty members’ responses fluctuated between not observing/experiencing subtle gender bias to observing off-color jokes and experiencing micro aggression, and implicit—unconscious bias. Responses regarding latter issues were non-specific other to note that they occurred. A number of faculty note that CEOAS is a welcoming environment overall where CEOAS community members work to quickly mitigate and resolve such incidents when they occur.
- Most of the faculty had received sexual harassment training via online, during orientation, College wide meeting or through the NSF-funded ADVANCE project. Based on the faculty responses it appears that CEOAS is taking proactive steps from this regard.
- There were mixed responses regarding gender diversity on the admissions committees. It appears that the departments in CEOAS with fewer female faculty had less representation of gender diversity on admissions committees versus the departments with greater number of female faculty. However, based on the responses, it appears that if there is a gender diversity issue, efforts are made to ensure that women can serve.
- Faculty members were not aware of any concerns raised or ever noticed gender differences in terms of taking and passing the milestones graduate program exams.
- With respect to faculty hiring, OSU has a Search Advocate program in place to deal with implicit biases on search committees and to make sure there is adequate gender

representation. Also, standardized questions have been incorporated in the interviews. CEOAS utilizes a Search Advocate on all college search committees.

- Most of the faculty members were not aware of the policies and procedures for pregnancy/childbirth or family care leave and had not requested such leave. Only a few faculty members were aware of University services and programs regarding pregnancy/childcare.

Highlights: NSF notes as a best practice that OSU has implemented a Search Advocate program for hiring committees. CEOAS provides comprehensive training and notification of discrimination and harassment reporting mechanisms on its research vessels. NSF recommends that the University and CEOAS continue to make efforts to increase undergraduate students’ awareness regarding Title IX policies and how to contact the Title IX Coordinator. NSF also recommends familiarizing the graduate student population and faculty with the university’s policies on childbearing and parental status as well as resources available for students and faculty with children. NSF requests that CEOAS revise the Ship Operations Safety Management Manual to provide contact information for ODI for individuals to file complaints and seek information about their Title IX protections.

FINDINGS: In Compliance

C. Research Groups/Projects Composition

Table 27- Geography Sponsored Research Participation

Geography Sponsored Research						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	12	6	50%	6	50%
	Ph.D.	19	12	63%	7	37%
2014-2015	M.S.	12	6	50%	6	50%
	Ph.D.	15	8	53%	7	47%
2015-2016	M.S.	10	4	40%	6	60%
	Ph.D.	11	5	45%	6	55%
2016-2017	M.S.	10	5	50%	5	50%
	Ph.D.	12	6	50%	6	50%
2017-2018	M.S.	11	6	55%	5	45%
	Ph.D.	14	8	57%	6	43%
TOTAL	M.S.	55	27	49%	28	51%
	Ph.D.	71	39	55%	32	45%

Table 28-Geology Sponsored Research

Geology Sponsored Research						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total

2013-2014	M.S.	15	7	47%	8	53%
	Ph.D.	25	11	44%	14	56%
2014-2015	M.S.	11	6	55%	5	45%
	Ph.D.	17	8	47%	9	53%
2015-2016	M.S.	13	5	38%	8	62%
	Ph.D.	25	14	56%	11	44%
2016-2017	M.S.	8	4	50%	4	50%
	Ph.D.	24	12	50%	12	50%
2017-2018	M.S.	14	7	50%	7	50%
	Ph.D.	21	9	43%	12	57%
TOTAL	M.S.	61	29	48%	32	52%
	Ph.D.	112	54	48%	58	52%

Table 29-OEAS Sponsored Research

OEAS Sponsored Research						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	M.S.	14	6	43%	8	57%
	Ph.D.	31	16	52%	15	48%
2014-2015	M.S.	11	4	36%	7	64%
	Ph.D.	37	19	51%	18	49%
2015-2016	M.S.	17	11	65%	6	35%
	Ph.D.	36	17	47%	19	53%
2016-2017	M.S.	16	9	56%	7	44%
	Ph.D.	35	16	46%	19	54%
2017-2018	M.S.	14	7	50%	7	50%
	Ph.D.	36	15	42%	21	58%
TOTAL	M.S.	72	37	51%	35	49%
	Ph.D.	175	83	47%	92	53%

Table 30-MRM Sponsored Research

MRM Sponsored Research						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	MS	29	10	34%	19	66%
2014-2015	MS	27	7	26%	20	74%
2015-2016	MS	25	6	24%	19	76%
2016-2017	MS	20	6	30%	14	70%
2017-2018	MS	22	6	27%	16	73%
TOTAL	MS	123	35	28%	88	72%

Table 31-CEOAS Undergraduate Sponsored Research

CEOAS Undergraduate Sponsored Research						
Academic Year	Degree	Total	Male	% of Total	Female	% of Total
2013-2014	Bachelors	25	15	60%	10	40%
2014-2015	Bachelors	27	13	48%	14	52%
2015-2016	Bachelors	29	15	52%	14	48%
2016-2017	Bachelors	29	17	59%	12	41%
2017-2018	Bachelors	72	25	35%	47	65%
TOTAL	Bachelors	182	85	47%	97	53%

Highlights: NSF observes no pattern of gender-based discrimination based on the data provided to the agency.

FINDINGS: In Compliance

VII. Title IX Regulation Compliance

NSF Title IX implementing regulations at 45 C.F.R. § 618.135(a) require awardee institutions to: 1) designate at least one employee to coordinate its efforts to comply with and to carry out its responsibilities under Title IX and disseminate the Title IX Coordinator’s contact information to the recipient’s academic community; 2) adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee complaints alleging any action that would be prohibited by these regulations. The Title IX regulations 45 C.F.R. § 618.140 also require that the awardee institution take specific and continuing steps to notify admissions applicants, students and employees that the awardee institution will not discriminate on the basis of sex in its educational programs and activities.

A. Title IX Coordinator Designation and Title IX Program Administration (or enforcement)

At OSU, EOA is the OSU office responsible for overseeing compliance with civil rights and affirmative action laws, regulations, and policies on behalf of OSU. EOA provides guidance and training and investigates sex discrimination and sexual misconduct complaints. The EOA Executive Director has been designated by OSU as its Title IX Coordinator. The Title IX Coordinator answers directly to the OSU President.

With respect to Title IX program administration, NSF found that the EOA Title IX compliance component is headed by Director of Investigations/Deputy Title IX Coordinator. This was an unfilled position at the time of the onsite visit, but as of the date of this report, now has an individual appointed to this role. This director manages a staff of “Equity Associates” who provide guidance on OSU’s discrimination and harassment policies to colleges and units assigned to each associate. These associates also investigate discrimination and harassment complaints that arise in their assigned colleges and units. NSF reviewed the equity associate position description and found that the minimum qualification was possession of a Juris Doctorate from an accredited law school and at least one year of relevant work experience. OSU

later clarified The education minimum requirement has changed since NSF’s onsite visit to “possession of a Master’s degree with a Juris Doctorate preferred”. CEOAS faculty and staff praised the close working relationship between CEOAS and its assigned equity associate who has assisted in providing training and complaint reporting mechanisms for CEOAS labs, field sites and research vessels.

Highlights: NSF observed that Oregon State University has a designated Title IX Coordinator. The person filling that position has the appropriate background and training to fulfill the responsibilities of the Title IX Coordinator. NSF also observed that the Equity Associates are highly qualified and CEOAS has a close, collaborative and productive working relationship with its Equity Associate which can be highlighted as a best practice.

FINDINGS: In compliance

B. Dissemination of Contact Information and Statement of Nondiscrimination

The OSU Title IX Coordinator’s contact information and nondiscrimination statement can be found on the OSU website through multiple avenues including, searching “title IX coordinator” in the search bar and by visiting the EOA website. However, there is not a direct link to the Title IX Coordinator’s contact information on the website under the current student page on the main OSU website or from the CEOAS website.

Highlights: NSF should be included on the OSU website (<https://eoa.oregonstate.edu/state-and-federal-agencies>) as a federal agency that complaints of discrimination and harassment can be filed with. OSU should also include a link to NSF’s online awardee civil rights complaint form. https://www.nsf.gov/od/odi/complaint_form.jsp Additionally, OSU should place a link to the Title IX Coordinator’s contact information on the current student page on the main OSU website as well as the CEOAS website. OSU should periodically examine its media to determine where the Title IX Coordinator’s contact information should be placed to ensure accessible and effective communication of this information.

FINDINGS: In Compliance

C. University Policy Related to Title IX

Table 32-Oregon State University Policy and Procedures

Document	Date of Last Update	Location
Consensual Relationships Policy	Unknown	https://eoa.oregonstate.edu/consensual-relationships-policy
Discrimination and Harassment Policies	Unknown	https://eoa.oregonstate.edu/discrimination-and-harassment-policies

Discrimination Policy	Unknown	https://policy.oregonstate.edu/UPSM/04-020_discrimination
Retaliation Policy	Unknown	https://eoa.oregonstate.edu/retaliation-policy
Sexual Misconduct and Discrimination Policy	September 2017	https://eoa.oregonstate.edu/sexual-misconduct-and-discrimination
Responsible Employees and Reporting Incidents of Sexual Misconduct or Discrimination	September 2018	https://policy.oregonstate.edu/UPSM/05-005_responsible_employees

Highlights: NSF notes as a best practice the inclusion of the following: specific provisions in OSU’s Discrimination Policy: Assistance to Organizations, Admissions, Recruitment, Access to Course Offerings, Counseling and Use of Appraisal and Counseling Materials, Housing, Comparable Facilities, Financial Assistance, Employment Assistance to Students, Health and Insurance Benefits and Services, Marital or Parental Status, Athletics, Textbooks and Curricular Materials, and Students Unable Because of Religious Beliefs to Attend Classes on Certain Days. NSF also notes that it is a best practice to include “gender identity, gender expression, and sexual orientation” in its Sexual Misconduct and Discrimination Policy.

FINDINGS: In Compliance

D. Title IX Policy Dissemination

OSU’s policies and procedures are posted on their website, as well as publicized and trained on in a variety of arenas. The policies related to Title IX are easy to locate and are written in age appropriate language to be easily understood.

Highlights: NSF should be included on the OSU website (<https://eoa.oregonstate.edu/state-and-federal-agencies>) as a federal agency that complaints of discrimination and harassment can be filed with.

FINDINGS: In Compliance

E. Self-Study

Table 33-Oregon State University Self-Evaluation

Date of Self-Evaluation	Responsible Administrator/Office	Review
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2016-2017	Office of Equal Opportunity and Access	Sexual Violence Climate Assessment
2016-2017	Office of Equal Opportunity and Access	Annual Report
2011-2018	President’s Commission on the Status of Women	Annual Report

Highlights: NSF notes as best practices that the OSU leadership has sponsored the President and Provost’s Leadership Council for Equity, Inclusion, and Social Justice and the President’s Commission on the Status of Women as best practices.

NSF has reviewed a number of EOA Annual Reports and notes that with respect to statistics, OSU community members who file complaints with EOA are categorized in the following manner: Student, Classified Staff, Professional Faculty, Academic Faculty, Non-specified/Non-Binary. NSF recommends that the Student classification category be separated into two student categories: Undergraduate Students and Graduate Students, since sexual misconduct may occur in different setting, contexts, and relationships for graduate students than for undergraduate students. In a 2019 Association of American Universities (AAU) [Survey](#) on Sexual Harassment in Academia, the AAU found that graduate and professional students were most likely to be subject to sexually harassing behavior by a faculty member or instructor. For example, 24.0 percent of incidents of sexual harassment experienced by graduate and professional women were by a faculty member or instructor. This compares to 5.5 percent for undergraduate women. Similarly, 18.2 percent of graduate and professional men were sexually harassed by a faculty member or instructor compared to 4.3 percent of undergraduate men.

FINDINGS: In Compliance

F. Title IX Training

While there is no NSF Title IX regulatory requirement that awardee institutions provide Title IX, sexual harassment/misconduct, bystander or similar training, many colleges and universities provide this training in response to US Department of Education Title IX “Dear Colleague Letters.” Similar to other Federal agencies, NSF evaluates this training and how and to whom it’s offered. NSF notes that the US Department of Education’s revised Title IX regulations which go into effect on August 14, 2020 will require that Title IX Coordinators, investigators, decision-makers and others involved in institutional Title IX investigative and adjudicative processes have training related to these processes.

Oregon State University utilizes two online educational courses for OSU undergraduate and graduate students. The courses are Sexual Assault Prevention for Undergraduates and Sexual Assault Prevention for Adult Learners. The vendor that provides these courses is EVERFI and there are approximately 200 institutions of higher education that utilize these two courses. The training is mandatory and failure to complete them will result in a grade hold of the student’s account. The topics covered include sexual assault, sexual harassment, relationship violence,

stalking, the intersection of personal values with healthy relationships, and bystander intervention. The participants are evaluated, and the post-survey results indicate that the programs bring value to the campus.

OSU's EOA also offers in person training for all OSU community members on topics related to Accommodations and Accessibility, Affirmative Action and Equity in Hiring Practices, Sexual Harassment and Prevention, Discrimination, and Responsible Employee Reporting. Further, the Office of Institutional Diversity offers a presentation on Bias Response which includes information on the OSU Bias Response Team.

Additionally, NSF reviewed communication that indicated in 2016, the Dean of CEOAS put forth considerable effort to have all CEOAS faculty, staff, and graduate students receive sexual harassment training and was working to create a policy regarding sexual harassment that was CEOAS specific. EOA's 2017-18 Annual Report states that Title IX and Responsible Employee training was delivered to CEOAS in 2018, as well as other components of OSU. The Annual Report also states that another set of modules that include sexual harassment, Title IX, and discrimination was scheduled to launch in 2019. The modules actually launched on April 4, 2019 and all OSU employees were required to take them.

Highlights: NSF notes as a best practice the CEOAS leadership efforts to pursue a college-wide policy regarding sexual harassment training and requiring students to participate in mandatory training as a best practice. OSU informed NSF in its February 21, 2020 response to the draft report that all faculty and staff in CEOAS received in-person training on sexual harassment, Title IX and responsible employee reporting. Moreover, all CEOAS faculty, staff and students have access to OSU's mandatory critical training modules that are online: Sexual Harassment, Discrimination, Title IX, Ethics, and Mandatory Reporting of Child Abuse.

FINDINGS: NSF has no concerns with the implementation of training in this area.

G. Title IX-Related Complaint Investigations and Resolution

With respect to Title IX-related complaint investigations, NSF found that EOA conducts the investigations under OSU's Sexual Misconduct and Discrimination Policy and when the investigation is completed, EOA will forward a final investigation report and all relevant evidence to OSU's Office of Student Conduct & Community Standards (SCCS) if the responding party is a student. The Director of SCCS will determine whether the findings are a violation of OSU's policy or the Code of Student Conduct and what sanctions, if any will be implemented.

NSF found that draft investigative reports are provided electronically to the reporting and responding parties for a length of time before the draft report is no longer accessible. This allows each party to review the information, facts and findings, correct or dispute factual information and findings.

If the responding party is an OSU employee, including faculty and staff, OSU's Office of Human Resources (OHR) and Office of Faculty Affairs (FA) will receive the report and, after

consultation with the employee's supervisory chain, make a determination about whether to invoke the applicable process to impose sanctions . Most OSU employees are required to contact EOA if they are aware of a possible violation of this policy or Title IX.

As previously stated, EOA has the responsibility of investigating Title IX- related complaints. EOA processed 14 Title IX related complaints by CEOAS students from November 2014-April 2018. Nine complaints were voluntarily resolved, one complaint was administratively resolved, one complaint was deemed a report only, and three complaints were investigated.

During the onsite phase of the review, NSF learned of a CEOAS faculty member who worked on NSF-funded research awards who was the respondent in a complaint filed with EOA in November 2018. At the time of the review, the investigation was still ongoing but about to be concluded. OSU later informed NSF that the faculty member was found responsible for violating OSU's sexual misconduct and discrimination policy and separated from OSU at the end of the 2018-19 academic year. OSU implemented mechanisms to guard against ongoing harassment during the remainder of the faculty member's appointment. OSU officials indicated that the faculty member could not separate sooner because of the faculty member's terms of employment that restricted a faster non-renewal of the faculty appointment, along with concerns about impact to testifying witnesses in a longer termination process.

Highlights: NSF notes that OSU appears to have followed University policy and procedures when processing the Title IX related complaints involving CEOAS students, faculty, and staff. Student reporting and responding parties have full access to EOA investigative reports for review in order to understand and challenge findings before the final report is issued.

Findings: In Compliance

VIII. Conclusion

The National Science Foundation recognizes the effort that OSU has put forth in order to comply with Title IX of the Education Amendment of 1972 and NSF regulations. The Title IX compliance review team acknowledges the following best practices at the University:

- Recruitment efforts include engagement with various professional organizations that target minority populations.
- OSU admissions policies and criteria appear to be neutral, fair, and valid predictors of success.
- Paid family leave and childcare subsidies.
- Search Advocate program for hiring committees.
- Inclusion of specific provisions on Assistance to Organizations, Admissions, Recruitment, Access to Course Offerings, Counseling and Use of Appraisal and Counseling Materials, Housing, Comparable Facilities, Financial Assistance, Employment Assistance to Students, Health and Insurance Benefits and Services, Marital or Parental Status, Athletics, Textbooks and Curricular Materials, and Students Unable Because of Religious Beliefs to Attend Classes on Certain Days in the OSU Discrimination Policy.

- Inclusion of “gender identity, gender expression, and sexual orientation” in its Sexual Misconduct and Discrimination Policy.
- The President and Provost’s Leadership Council for Equity, Inclusion, and Social Justice and the President’s Commission on the Status of Women.
- Mandatory online critical training modules on Title IX Sexual Misconduct and Violence, Sexual Harassment, and Discriminatory Harassment for all employees, including student-employees.
- Strong relationship between EOA and CEOAS with an EOA Equity Associate assigned to CEOAS
- Efforts to ensure that research vessels and field sites are free of sexual misconduct

While OSU is in compliance with Title IX with respect to the scope of this compliance review, the Title IX compliance review team has identified several areas in which further action may enhance and strengthen OSU’s implementation of Title IX regulatory requirements and compliance posture. Therefore, NSF recommends that OSU take the following actions:

- Annual evaluation of the recruitment and admissions experiences of CEOAS applicants to ensure a fair and equitable process.
- Monitor the use of stipends as a tool to attract top candidates to ensure that it is being provided in a fair and equitable manner.
- Standardize all forms of evaluation to reduce the influence of unconscious bias in the admissions process.
- Standardize the selection process for financial award recipients.
- Annual evaluation of the selection process of its applicants for financial awards to ensure a fair and equitable process.
- Increase undergraduate students’ awareness regarding Title IX policies and how to contact the Title IX Coordinator.
- Familiarize the graduate student population and faculty with the university’s policies on childbearing and parental status as well as resources available for students and faculty with children.
- Include NSF on the OSU website (<https://coa.oregonstate.edu/state-and-federal-agencies>) as a federal agency that complaints of discrimination and harassment can be filed with.
- Place a link to the Title IX Coordinator’s contact information on the current student page on the main OSU website as well as the CEOAS website.
- In future EOA Annual Reports, provide statistics for reporting the number of complaints and other data that uses the “student” category to undergraduate students and graduate students separately.