

January 30, 2019

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highlights, 2016–26," U.S. Bureau of Labor Statistics, October 2017, <https://doi.org/10.21916/mlr.2017.29>). They represent the nation's great promise of intellectual contributions to the advancement of science and to the knowledge age. While sexual harassment may affect individuals of any gender, research demonstrates that women are by far the primary targets and, among women, that women of color are prevalent targets. The Signatory Societies recognize the moral imperative to eliminate sexual harassment in STEMM, and further that in our national and global interests we must ensure full participation. The United States cannot afford to waste our most abundant intellectual talent, nor can society-at-large afford to be deprived of the contributions of that talent.

What the Research Shows — Research and evidence demonstrate that there has been little systemic progress in reducing the barriers to inclusion associated with sexual and gender harassment. In the STEMM fields in particular, a recent 2018 consensus study by the National Academies of Sciences, Engineering and Medicine titled,

Title IX Is Not the Only Solution, But It Is a Necessary and Essential Foundation — Existing legal structures (including Title IX) alone are insufficient to create the needed changes of conduct to reduce barriers to full participation. The Signatory Societies fully appreciate that institutions and organizations, including each of ours, need to work individually and collectively to create and promote policies, practices, and other tools, beyond the requirements of Title IX, driven by ethics, equity, inclusion, diversity, and excellence in STEMM fields.

As importantly, we are not questioning the good faith of institutions of higher education (IHEs). We do not expect most IHEs to abandon aims of good policy simply because changed Title IX regulations would now allow them to do so.

Nevertheless, it is crucial that Title IX requirements support effective policy and other efforts in academia to prevent and eliminate sexual harassment as a barrier to the full and equal participation, .(9i S)4(TE)1(M)9(M)(TjEMC /P #MCID 3 9J0 Tc 08.04-0M)98.04108(349.9)-7m

Particularly concerning is the example given by the Administration that an on-campus rape by an institution's students would not trigger an institution's obligation to respond under Title IX, if the victim were not formally a part of that institution's educational program. This unnecessarily narrow interpretation of "program or activity" under Title IX does not take into account what research shows: that sexual harassment affects those who are aware of incidents, and that the occurrence of sexual harassment may increase when nothing is done. p. 47 ("the perceived absence of organizational sanctions increases the risk of sexual harassment perpetration"). Clearly, the fact of the rape, on its campus, by its students, regardless of the status of the victim, could create an unsafe, hostile environment for its students if the institution did nothing in response.

Another example of the problematic limitation of "program or activity" relates to the collaborative nature of STEM education and research. Educational programs and research are commonly undertaken collaboratively among several institutions, involving multiple institutions' faculty, researchers, and students, and undertaken at one or more of the participating institutions' facilities, or perhaps, in other locales. If the target and accused in an incident of sexual harassment were not from the same institution, even though they were directly involved (and others from all the institutions were affected), one or more institutions should, as a matter of principle, have responsibility, and could in fact respond—but no institution would be obligated under the proposed Title IX regulations to respond to the incident. Such circumstances are not uncommon in instances of team science across two or more institutions. Graduate student trainees or early career scientists of one institution may be sexually

American Physiological Society
American Phytopathological Society
American Political Science Association
American Psychological Association
American Society for Biochemistry and Molecular Biology
American Society for Cell Biology
American Society for Engineering Education
American Society for Pharmacology & Experimental Therapeutics
American Society of Agronomy
American Society of Naturalists
American Society of Nephrology
American Sociological Association
American Statistical Association
ASHRAE
Association for Women in Mathematics
Association of Academic Health Sciences Libraries (AAHSL)
Association of Anatomy Cell Biology and Neurobiology Chairs
Association of Psychologists in Academic Health Centers
Association of University Anesthesiologists
Association of University Radiologists
Biophysical Society
Cognitive Science Society
Conference Board of the Mathematical Sciences
Consortium of Social Science Associations
Council of Faculty & Academic Societies (CFAS)
Crop Science Society of America
Ecological Society of America
Federation of American Societies for Experimental Biology (FASEB)
Federation of Associations in Behavioral & Brain Sciences
Foundation for Science and Disability
Institute of Food Technologists
Institute of Mathematical Statistics

Society of Systematic Biologists
Society of Teachers of Family Medicine
Society of Toxicology (SOT)
Society of University Surgeons
Soil Science Society of America

Appendix A to Societies Comment Letter on Proposed Title IX Regulations

The following information describes the Signatory Societies.

- The American Association for the Advancement of Science is the largest general scientific membership society in the world, and publisher of the family of journals. Our mission is to advance science, engineering, and innovation throughout the world for the benefit of all people.
- The American Educational Research Association is the largest research society dedicated to the scientific study of education and learning. Founded in 1916, the Association strives to advance knowledge about education, to encourage scholarly inquiry related to education, and to promote the use of research to improve education and serve the public good.
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- The American Association of Colleges of Pharmacy (AACP) represents all US colleges and schools of pharmacy and their faculty. Since 1900 AACP has supported members as they strive to improve the quality of pharmacy education and prepare pharmacists and scientists to help people live healthier, better lives.
- The American Association of Geographers (AAG), founded in 1904, is a nonprofit scientific and educational society established to advance geographic research, education, and applications. Its over 12,000 members from more than 60 countries share interests in the theory, methods, and practice of geography, which they cultivate through the AAG's Annual Meeting, four scholarly journals (Annals of the Association of American Geographers, The Professional Geographer, GeoHumanities, and the AAG Review of Books), and extensive research and outreach projects around the world.
- The American Association of Physics Teachers is the premier national organization and authority on physics and physical science education with members worldwide. Our mission is to advance the greater good through physics education. We serve our members and the larger community through a variety of programs and publications. AAPT was founded in 1930 and is headquartered in the American Center for Physics in College Park, Maryland.
- Founded in 1954, the American Astronautical Society has long been recognized for the excellence of its national meetings, technical meetings, symposia and publications and for their impact on shaping the U.S. space program. Members have opportunities to meet with leaders in their field and in related disciplines, exchange information and ideas, discuss career aspirations and expand their knowledge and expertise.
- Founded in 1876 and chartered by the U.S. Congress, the American Chemical Society (ACS) is the world's largest scientific society. Our mission is to advance the broader chemistry enterprise and its practitioners for the benefit of Earth and its people. Our vision is to improve people's lives through the transforming power of chemistry.
- The American College of Obstetricians and Gynecologists (ACOG) is the nation's leading group of physicians providing health care for women. As a private, voluntary, nonprofit membership organization of more than 58,000 members, ACOG strongly advocates for quality health care for women, maintains the highest standards of clinical practice and continuing education of its members, promotes patient education, and increases awareness among its members and the public of the changing issues facing women's health care.
- The American College of Physicians (ACP) is the largest medical specialty organization and the second largest physician group in the United States. ACP members include 154,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness.
- The purpose of the American Geophysical Union is to promote discovery in Earth and space science for the benefit of humanity. We galvanize a community of Earth and space scientists

communication and application of psychological knowledge to benefit society and improve people's lives.

- The American Society for Biochemistry and Molecular Biology (ASBMB) is a nonprofit scientific and educational organization with over 12,000 members. The Society's mission is to advance the science of biochemistry and molecular biology and to promote the understanding of the molecular nature of life processes.
- The American Society for Cell Biology (ASCB) is an inclusive, international community of basic biomedical researchers studying the cell, the fundamental unit of life. The ASCB has 8,000 members in all 50 states and 65 other nations. We are dedicated to advancing scientific discovery, advocating sound research policies, improving education, promoting professional development, and increasing diversity in the scientific workforce.
- The American Society for Engineering Education (ASEE) is a global society of individual, institutional, and corporate members founded in 1893. ASEE advances innovation, excellence, and access at all levels of education for the engineering profession. ASEE is broadly concerned with instruction, research, public service, professional practice, and societal awareness.
- The American Society for Pharmacology and Experimental Therapeutics (ASPET) is a scientific society whose members conduct basic and clinical pharmacological research and work for academia, government, large pharmaceutical companies, small biotech companies, and non-profit organizations. ASPET members work in a variety of different fields and include neuroscientists, toxicologists, chemical biologists, pharmacists, cardiovascular scientists, and many more.
- The American Society of Agronomy (ASA) is a progressive international scientific and professional society that empowers scientists, educators, and practitioners in developing, disseminating, and applying agronomic solutions to feed and sustain the world. Based in Madison, WI, ASA is the professional home for 8,000+ members and 14,000+ certified professionals (Certified Crop Advisers) dedicated to advancing the field of agronomy. ASA provides information about

- The American Statistical Association is the world's largest community of statisticians and the oldest continuously operating professional science society in the United States. Its members serve in industry, government and academia in more than 90 countries, advancing research and promoting sound statistical practice to inform public policy and improve human welfare.
- ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 56,000 members worldwide focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.
- The Association for Women in Mathematics (AWM) is a non-profit organization representing more than 3500 members (women and men) of the mathematical community — from the United States and around the world. The purpose of the AWM is to encourage women and girls to study and to have active careers in the mathematical sciences, and to promote equal opportunity and the equal treatment of women and girls in the mathematical sciences.
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- The Foundation for Science and Disability promotes the integration of persons with disabilities into all activities of the scientific community and of society as a whole, and promotes the removal of barriers that hinder successful integration.
- Since 1939, the Institute of Food Technologists (IFT) has been advancing the science of food and its application across the global food system by creating a dynamic forum where individuals from more than 90 countries can collaborate, learn, and grow, transforming scientific knowledge into innovative solutions for the benefit of people around the world.
- The Institute of Mathematical Statistics fosters the development and dissemination of the theory and applications of statistics and probability.
- The Linguistic Society of America (LSA) is a scholarly professional association dedicated to advancing the scientific study of language. Among other purposes, the LSA reprw 34.9sicesh:34.9snd

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the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector.

- The Society for Computers in Psychology (SCiP) focuses on computational models of cognitive processes, computational tools for data collection and analysis, human-computer interaction, knowledge representation, machine learning, Internet-based research, and technology in the service of improving and evaluating behavioral outcomes.
- Society for Industrial and Applied Mathematics (SIAM), headquartered in Philadelphia, Pennsylvania, is an international society of more than 14,500 individual, academic and corporate members from 85 countries. SIAM helps build cooperation between mathematics and the worlds of science and technology to solve real-world problems through publications, conferences, and communities like chapters, sections and activity groups.
- The Society for Neuroscience is a professional society, headquartered in Washington, DC, for basic scientists and physicians around the world whose research is focused on the study of the brain and nervous system.
- The Society for Personality and Social Psychology, founded in 1974, is the world's largest organization of social and personality psychologists. With over 7,500 members, SPSP strives to advance the science, teaching, and application of social and personality psychology.
- The Society for Text and Discourse is an international society of researchers who investigate all aspects of discourse processing and text analysis. The purpose of the Society is to consolidate research in discourse processing and to enhance communication among researchers in different disciplines. A second objective of the society is to contribute to the education and professional development of those in the field or entering the field.
- Founded in 1936, the Society for the Psychological Study of Social Issues is an association of scientists from psychology and related fields who seek to bring theory and practice into focus on human problems of the group, the community, and nations, as well as the increasingly important problems that have no national boundaries.
- The Society for the Study of Evolution was founded in March, 1946. The objectives of the Society for the Study of Evolution are the promotion of the study of organic evolution and the integration of the various fields of science concerned with evolution.
- The Society of Experimental Social Psychology (SESP) is an international scientific organization dedicated to the advancement of social psychological research. Our typical members have Ph.D.s in social psychology, and work in academic or other research settings.
- The Society of Systematic Biologists advances the science of systematic biology in all its aspects of theory, principles, methodology, and practice, for both living and fossil organisms, with emphasis on areas of common interest to all systematic biologists regardless of individual specialization.

- The Society of Teachers of Family Medicine is multidisciplinary medical organization dedicated to