Making Your Campus More Inclusive for Transgender and Non-Binary Students

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Detailed Outline:

1. Introduction
2. USC Title IX Accommodations Provided by Fall 2016
3. The Workgroup and Recommendations for Systemic Changes to the Provost
4. Plans for continuing our self-assessment
5. Questions & Discussion
DCL on Transgender Students

- May 13, 2016 letter was released, and I took lead on our self-assessment and inclusion project.

**Crux of the Letter**

“The Departments treat a student’s gender identity as the student’s sex for purposes of Title IX and its implementing regulations. This means that a school must not treat a transgender student differently from the way it treats other students of the same gender identity.”
Practical Implications of DCL

Included:

1. Harassment on the basis of gender identity is a violation of Title IX
2. The school may create a hostile environment by failing to treat students in ways consistent with their gender identities
3. No legal documentation required to treat students in ways consistent with their gender identity
4. Schools should use names and pronouns consistent with the student’s gender identity regardless of legal name or sex on their educational record
5. Gender identity and transgender status are FERPA protected Personal Identifying Information
First Steps

1. **Beginning May 23, 2016**: Meeting with campus partners LGBT resource center, Residential Education, Housing, Student Counseling Services, the Registrar, student health, USCard, Information Technology Services, and the Dean of Religious Life.

2. **July 2016**: we learned that an incoming transgender first year student was seeking assistance, and I identified four immediate accommodations to help him.
Four Accommodations Based on Gender Identity

1. New NetIDs (_______@usc.edu)
2. Faculty letters with preferred name and pronouns
3. Assistance changing the name that appears in other people’s inbox to list preferred name
4. USCards with preferred name
Make It Easier on Yourself!

Create a form letter and email template for sending faculty letters.

PRIVATE: FERPA PROTECTED INFORMATION

Dear ____________:

Title IX Accommodation: Gender Identity

The Title IX office is responsible for enforcing the University of Southern California’s nondiscrimination and anti-harassment policy for students in protected classes. Coordinating necessary accommodations for individuals in protected classes and investigating reports of harassment are two of our primary responsibilities. Gender identity is a protected class recognized at USC just as race, sex, and religion are protected classes.

At USC we are working to ensure that students are referred to by pronouns and names consistent with a transgender student’s gender identity. Until the Student Information System is updated to reflect these names on class rosters, the Title IX office is coordinating campus accommodations for transgender students.

I am writing to you because a student enrolled in your class has requested that you address them by the following name and pronouns:

Course and section if applicable:

10 Digit ID:
Name You Should Use:

Pronouns you should use:

Please be sure to share this information with your Teaching Assistant if applicable. Please note that in addition to using the name and pronouns above when addressing this student, you are also expected to protect the student’s privacy. Taking reasonable steps to protect the student’s privacy related to their transgender status, including legal name or sex assigned at birth is required by the Family Education Rights Privacy Act (FERPA). Failure to protect this information may also constitute grounds for a discrimination or harassment complaint from the affected student to the Office of Equity and Diversity or Title IX Office as nonconsensual disclosure of personally identifiable information may contribute to the creation of a hostile environment.

If this accommodation letter leaves any policy or procedural questions unanswered, please call the Title IX office (213-740-5086) or email isettax@usc.edu. If you would like to discuss gender identity more generally or if you would like tips on how to make your classroom familiar to transgender and gender nonconforming students please call the LGBT Resource Center (213-740-7619). For general information about gender pronouns please visit this website:

http://www.transstudent.org/resourcetool

Sincerely,
Kegan Aller-Mosawi, PhD
Assistant Director, Title IX
Welcome Week Trainings for Students & Parents

• In partnership with the LGBT Resource Center Director, we hosted one student and one parent session during move-in week that focused on gender identity and student rights.

• More than 50 students attended and the requests for accommodations started to increase
Student Information System (SIS) Workgroup

- Blackboard
- Panhellenic
- Global Directory
- Student Health
- Advising Database
- Student Conduct
- Interfraternity Council
- Grading Roster System
1. Include preferred name, gender identity, and pronouns in SIS and in supporting systems for all current students.
   - Requires creating these fields in the DOS system on multiple pages because they do not exist.
   - Only legal name and sex existed, and you cannot overwrite those because some systems need that information still.
   - Create a space for Common App data to be deposited.
   - Identify which systems need legal name and/or preferred name, pronouns, and gender identity.
How We Use Names

Outside the University:
Legal Name & Sex
(FAFSA, W-2, prescriptions, etc.)

Within the University:
Preferred Name & Pronouns
(ID cards, rosters, advising, etc.)
Recommended Changes to the Provost

2. Create a forward-facing page for students to update their own information

- Recommendation: The student-facing preferences page should also auto-populate a list of the student’s instructors’ and advisor’s email addresses and allow the student to add and remove emails to this list, upon submitting the changes an email would be automatically generated, notifying the recipients about the changes and providing links to educational resources on trans-related best practices.

- May not work with the roster system and be difficult for faculty mid-semester.
Forward facing Page for Students

- Preferred Name (short text entry)
- Pronouns (radio buttons with multiple selection)
  - Instructions should make it clear that this information will be used to let professors and classmates know how to address students.
  - She / Her / Hers
  - He / His / His
  - They / Them / Theirs
  - Ze / Hir / Hirs
  - It / It / Its
  - Name Only OR “Use My Name”
  - Not Specified (as a selection in and of itself)
  - Not Listed [with short text entry]

(All missing data will be populated with “Not Specified”)

Forward facing Page for Students

Salutation
(single selection - radio buttons)
- Dr.
- Ms.
- Miss.
- Mrs.
- Mx.
- Mr.
- Rev.
- (None) [returns empty field]
- Not Listed [with short text entry]
  (All missing data will be left empty [(None)])

Gender Identity
(radio buttons with multiple selection)
- Woman
- Man
- Transgender
- Agender
- Non-binary
- Gender Non-conforming
- Not Listed [with short text entry]
Recommended Changes to the Provost

3. Create and Implement Education and Communication Plans

- **Students:**
  - What are your rights?
  - How is this used?
  - How do you update?
  - What does this affect?

- **Staff & Faculty:**
  - What are the student's rights?
  - How can they find the student's information?
  - What names and pronouns should they use?
  - How can they learn more about transgender and gender non-conforming students?
Recommended Changes to the Provost

4. Update Forms

• Update Certification and Intent to enroll forms
  o Create questions to check the accuracy of personal identifying information and collect information that is not already collected (e.g. gender identity and pronouns).
  o Implement a third sex option (N) on applications to reflect recent legal changes in California and Oregon.

• Update graduate student applications to collect similar information as the common app, and change language from “nickname” to “preferred name”.
Recommended Changes to the Provost

5. Update FERPA training to include gender identity and new name

6. Explore the implementation of non name-based NetID (alpha-numerical) in combination with user controlled aliases so that students who have not legally changed their name yet do not have to worry that their NetID will compromise their privacy

7. Work with the Registrar to change transcripts for transgender alumni who legally change their name after graduation
Successes To Date

• The Provost approved all of our recommendations and instructed the Chief Information Officer to assess what is possible and how long it will take.

• We now have a preferred name field in SIS, but it is on a limited-access page with SSN so few can see it.
  o We are assessing which pages in SIS are used most so we can add the field on those pages as well.

• We changed a women’s restroom by the LGBT Resource Center into our first all-gender, multi-stall restroom on campus after receiving reports of comments that could create a hostile environment.
Many members of our community have expressed concern about the rescission of federal guidance on the rights of transgender students. University policy continues to prohibit discrimination on the basis of gender identity. USC and the Title IX Office/Office of Equity and Diversity remain fully committed to protecting your opportunity to thrive regardless of gender identity and expression, sexual orientation, race, national origin, religion, physical ability, sex, or any other protected characteristic.

This is not just about compliance with state and federal law. It is about who we are as Trojans.

Onward,

Gretchen Dahlinger Means
Title IX Coordinator & Executive Director of the Office of Equity and Diversity
University of Southern California

For more information see https://policy.usc.edu/student-misconduct/ and USC’s Equal Opportunity, Affirmative Action and Non-Discrimination policies for staff and faculty.
Plans for Continuing Our Self-Assessment

Facilities:

- Multi-stall, all-gender restrooms; creating a 1 per building minimum standard for all-gender bathrooms on all USC campuses.

- All-gender locker rooms
Plans for Continuing Our Self-Assessment

Campus-wide policy on use of salutations:

- Removing gender-based salutations when preferred salutations have not been collected
  - (e.g. financial aid uses gender based salutations on all communication)
Plans for Continuing Our Self-Assessment

Engemann Student Health:

• Create a policy on trans health care provision, including professional training for physicians and extra clinical time for trans patient care.

• Require that our student health insurance continue to provide coverage for trans related care.

• Require that a clinical psychologist position in SCS specialize in services for trans students including letter writing ability for hormone treatment and surgery.
Plans for Continuing Our Self-Assessment

Explore methods for collecting / populating pronoun field for all currently enrolled students (not just transgender students and incoming students)

- Top Suggestion: Populate all empty fields with "Not Specified"

- This means that most people’s pronouns will read as "Not Specified" but this gives cover to trans students who chose not specify because they want to control disclosure on an individual basis and avoids issues of accidental misgendering or unintentional outing.
Questions & Discussion?

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