

September 12, 2022

The Honorable Miguel Cardona  
Secretary of Education  
Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Catherine E. Lhamon  
Assistant Secretary, Office for Civil Rights  
Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

**Re: Docket ID ED–2021–OCR–0166, RIN 1870–AA16, Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance**

Dear Secretary Cardona and Assistant Secretary Lhamon:

We, the undersigned student affairs associations, respectfully submit these comments in response to the U.S. Department of Education’s proposed rule, under Title IX of the Education Amendments of 1972 (Docket ID ED–2021–OCR–0166), published July 12, 2022. We write both to commend the Department of Education (the Department) for many aspects of the rule, and to request several revisions and additions to further strengthen Title IX in tandem with the needs of today’s students, and the student affairs professionals working to serve them on the frontlines.

We collectively represent a coalition of associations that promote the understanding of learning and development across campus through the representation of professionals and students in student affairs roles. The undersigned associations write on behalf of a combined aggregate of 5,530 institutions and 59,930 members across all 50 U.S. states. We believe that the recommendations outlined below will work to advance the expertise of our college and university members, alongside the success and well-being of the students they serve.

We appreciate that the Department wishes to remove barriers for student survivors<sup>1</sup> who wish to make an official report. However, many research studies point to the fact that students who have experienced harm are more likely to make informal disclosures to those in their personal support network rather than to official sources on campus or in law enforcement<sup>2</sup>. We understand the role of the Department is to enforce institutions' compliance with Title IX and ensuring students' rights under Title IX. We hope, however, that the Department will proceed with a trauma-sensitive approach in understanding that not all students who experience harm will wish to report, and only comprehensive, upstream prevention will ultimately reduce sex- and gender-based discrimination.

We commend the Department for working to reverse confusion caused in the current rule by expanding current definitions, protections, accommodations, and the range of permissible

---

<sup>1</sup> In keeping with the language used in the proposed rule, students who report incidents of sexual harassment will be referred to as complainants and those who are accused of sex-based discrimination will be referred to as respondents. The term survivor will be used to refer to students who have experienced harm but have not made an official report to the Title IX Coordinator.

<sup>2</sup> Sabina, C. & Ho, L. Y. (2014). Campus and College Victim Responses to Sexual Assault and Dating Violence Disclosure, Service Utilization, and Service Provision. *Trauma Violence Abuse*. 15(3), 201-226.

options for institutions to utilize while remaining in compliance. Below we have highlighted several proposed changes to the rule that are especially important to the communities we serve.

We thank the Department for the addition of section 106.10, which clarifies the scope of sex-based harassment to include “sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation and gender identity.”<sup>3</sup> This addition provides much needed clarity regarding protected forms of harassment and ensures that this expanded definition applies throughout the entirety of the proposed rule. Close to half of state legislatures have enacted laws regarding sexual harassment on campus, and many require institutions to adopt and publish institutional sex discrimination policies.<sup>4</sup> We commend the Department for raising the floor for states’ definition of sex-based harassment defined in this section. We are also supportive of the Department’s proposal to expand protections based on gender identity<sup>5, 6</sup>

In addition, we commend the Department for expanding protections under Title IX to “conduct that is subject to the recipient’s disciplinary authority” and conduct “contributing to the hostile environment [occurring] outside the recipient’s education program or activity or outside the United States” as falling within the institution’s disciplinary authority.<sup>7</sup> Since the 2020 Title IX regulations were finalized, too many complainants, including students studying abroad and students who experienced sex-based discrimination in locations directly adjacent to campus, found themselves without recourse for pursuing a Title IX case with institutions. In a 2019 Association of American Universities campus climate survey: 46% of women; 51% of men; 47% of transgender, gender non-binary, or genderqueer; and 63% of those who declined to state their gender reported that the incident of sexual assault they experienced did not occur on campus. In terms of location, the highest rates of sexual assault occur in residential housing off campus (30% for women responders).<sup>8</sup> We recognize the necessity of protecting students both on and off-campus.

## Definitions

In 2019, NASPA submitted comments asking the Department to create a definition of harassment that can serve as a midpoint between the former Obama-era guidance and the current rule, and we believe that the Department has largely met this request through its proposed rule. Scholars have pointed to a tendency for survivors to minimize the severity of their harassment and have found a correlation between that minimizing and a lowered tendency

---

<sup>3</sup> 87 Fed. Reg. at 41571 (proposed 34 C.F.R. § 106.10)

<sup>4</sup> Sarubbi, M. (2019). Campus Sexual Assault Policies. Policy Snapshot. Education Commission of the States. <https://reports.ecs.org/comparisons/postsecondary-campus-safety-01>

<sup>5</sup> 87 Fed. Reg. at 41571 (proposed 34 C.F.R. § 106.10)

<sup>6</sup> 87 Fed. Reg. at 41571 (proposed 34 C.F.R. § 106.31(a)(2))

<sup>7</sup> 87 Fed. Reg. at 41571 (proposed 34 C.F.R. § 106.11)

<sup>8</sup> Cantor, D., Fisher, B., Chibnall, S., Harps, S., Townsend, R., Thomas, G., ... & Madden, K. (2019). Report on the AAU campus climate survey on sexual assault and misconduct. *The Association of American Universities, Westat, Rockville, Maryland*. <https://ira.virginia.edu/sites/ias.virginia.edu/files/aau-uva-campus-climate-survey-report-2019.pdf>

to seek access to campus supports that result in barriers to student success<sup>9</sup>.<sup>10</sup> We are appreciative of an expansive, yet detailed definition that will work to combat cultural narratives that delegitimize certain forms of harassment and provide greater guidance for campus practitioners and clarity for students. By expanding the current definition to include conduct that is “sufficiently severe or pervasive,” based on the “totality of the circumstances,” and conduct that “denies or limits a person’s ability to participate in or benefit from the recipient’s education program or activity,” survivors may feel more empowered to seek supportive measures and/or report.<sup>11</sup>

The Department makes distinctions between protections for incidents when the complainant and respondent are employees<sup>12</sup> and for incidents involving students, however the Department does not provide a comprehensive definition for what constitutes a student. In working to meet the needs of today’s students, we recognize that the campus community is connected to learners to a varying degree. Many frontline staff have raised concerns regarding the lack of clarity regarding how a student is defined. We therefore recommend the Department provide additional language to detail what constitutes a student to ensure that protections for all pre-enrolled and current learners, including credential learners, dual-enrolled students, study abroad students, and pre-enrolled students, are fully articulated within the final rule.

### **Responsible Employee Expansion**

We are concerned by the expansion of the definition of responsible employees or mandatory reporters<sup>13</sup> under the current regulation. There is ample evidence that indicates that mandatory reporting or compelled disclosure policies on campus cause harm to students who have experienced sex-based discrimination and that survivors are less likely to seek help and choose to disclose as a result of those rules.<sup>14</sup> We urge the Department to create more guardrails to ensure that complainants have full autonomy and the ability to disclose a report to the institution only when they are ready. One way that we recommend this happens is by requiring institutions to provide multiple confidential outlets for students who have experienced harm. These confidential support resources can be provided through the use of Memoranda of Understanding with community agencies or the hiring of additional confidential employees. It is imperative that institutions provide complainants with avenues for sharing their stories on their own terms without it prompting a formal response from the institution.

---

<sup>9</sup> Holland, K. J., & Cortina, L. M. (2017). “It happens to girls all the time”: Examining sexual assault survivors’ reasons for not using campus supports. *American journal of community psychology*, 59(1-2), 50-64.

[https://deepblue.lib.umich.edu/bitstream/handle/2027.42/136479/ajcp12126\\_am.pdf?sequence=2](https://deepblue.lib.umich.edu/bitstream/handle/2027.42/136479/ajcp12126_am.pdf?sequence=2)

<sup>10</sup> Cipriano, A. E., Holland, K. J., Bedera, N., Eagan, S. R., & Diede, A. S. (2022). Severe and pervasive? Consequences of sexual harassment for graduate students and their Title IX report outcomes. *Feminist Criminology*, 17(3), 343-367. <https://doi.org/10.1177/15570851211062579>

<sup>11</sup> 87 Fed. Reg. at 41569 (proposed 34 C.F.R. § 106.2(2)).

<sup>12</sup> 87 Fed. Reg. at 41459 (proposed 34 C.F.R. § 106.45).

<sup>13</sup> 87 Fed. Reg. at 41436 (proposed 34 C.F.R. § 106.44(c))

<sup>14</sup> Holland, K. J., and Cipriano, A. E. (2021). Does a report= support? A qualitative analysis of college sexual assault survivors’ Title IX Office knowledge, perceptions, and experiences. *Analyses of Social Issues and Public Policy*, 21(1), 1054-1081. <https://doi.org/10.1111/asap.12271>

We also recommend that the Department make additional exceptions specifically for disclosures made to employees when they have no intent of reporting an incident, such as within social media posts and within academic assignments. Although the Department carved out exemptions for Take Back the Night and disclosures via an online platform, the expanded definition of responsible employee and the emphasis by the Department on reporting, might still result in those responsible employees notifying the Title IX Coordinator of a disclosure in these cases, which could result in students being hesitant to speak about their experiences. Additionally, the Department should provide explicit guidelines outlining what constitutes a student employee in the context of disclosures and which student employees would be considered under the exception. These recommendations mirror those put forward within the comments submitted by the Academic Alliance for Survivor Choice in Reporting Policies (ASC).<sup>15</sup> Complainants have traditionally been able to use these avenues as safe methods to share their stories on their own terms, without the fear of it resulting in an official report being made to their institution. Without flexible options for disclosing their information, students will not feel comfortable sharing their stories and this fear can serve as an impediment to their ability to heal from the harm they have experienced.

### **Documenting Accommodations**

NASPA also commends the department for assuring that institutions are accountable for providing supportive measures to both parties involved in a Title IX investigation<sup>16</sup>. In addition, we applaud the requirement to provide supportive measures to complainants or survivors who do not officially become complainants in a case, but disclose that they have experienced harm<sup>17</sup>. Although noted elsewhere in this comment, NASPA reiterates that it is imperative that students who have experienced harm have confidential sources to whom they can disclose that harm and seek supportive measures without making an official report or launching a Title IX investigation. We understand that the only way for institutions to account for the fact that they have provided supportive measures that are requested is to keep record of them. However, there are significant concerns with the recordkeeping mechanisms outlined by the Department in the current regulations.

First, centering institutional supportive measures in a non-confidential office of official record can present a barrier for students needing assistance. This barrier exists both for responding parties and complaining parties involved in an investigation. Respondents may not seek help or assistance from the office responsible for fact gathering and making a finding of responsibility. Responding parties may worry that their specific requests for supportive measures could be used against them as part of an investigation. Students who have experienced harm may mistakenly believe that they must file or sign an official complaint in order to receive support or request supportive measures. Given the parameters outlined in the 2020 regulations, this would not be a rare misconception. Additionally, complainants who have filed an official report with the

---

<sup>15</sup> See

<https://psychology.unl.edu/sashlab/ASC%20Response%20Letter%20to%20Proposed%20Title%20IX%20Mandatory%20Reporting%20Regs.pdf>

<sup>16</sup>87 Fed. Reg. at 41447 (proposed 34 C.F.R. § 106.44(g))

<sup>17</sup>87 Fed. Reg. at 41448 (proposed 34. C.F.R. § 106.44(f)(3) and (g))

institution for the purpose of initiating an investigation may worry that their request for supportive measures could be interpreted and used to undermine their credibility during a Title IX investigation.

Additionally, we commend the Department for reinforcing that institutions must provide protections for pregnant and parenting students in order to be compliant with Title IX. This is an often overlooked area of student protection, and one that is worth highlighting as the Department did in the regulations. However, with the recent Supreme Court's decision to overturn *Roe v. Wade* and with it, constitutional protections to seek primary reproductive health services, including abortions, the records required to be kept by a Title IX Coordinator represent a significant risk for students seeking those supportive measures. Students have likely heard news reports about people close to pregnant and parenting students being held liable for aiding and abetting them in the student's time of need<sup>18</sup>. Knowing that any pregnancy-related supports these students request must be documented for recordkeeping purposes by the Title IX coordinator will in many cases dissuade students from seeking much-needed support. There are very real fears among Title IX coordinators, student support professionals, and students and families that these records could be subpoenaed and used to prosecute them or their friends and family if those accommodations requests are related to abortion in states where that form reproductive healthcare is now illegal.

We believe that the solution to this wide range of problems is to require institutions to provide multiple confidential resources for students who need to request supportive measures. This will benefit both respondents and complainants involved in official Title IX investigations, as well as student survivors who choose not to report but who need support to persist at the institution. This will also provide an added layer of protection for pregnant and parenting students who seek accommodations. To the extent that there are student support professionals who have privilege according to state law, that level of privacy would provide an even greater layer of protection for students requesting supportive measures. Having confidential sources for students to disclose to and seek supportive measures from is a best practice outlined in multiple research studies. Survivors report more positive experiences with advocates than other formal supports<sup>19, 20</sup> and support from victim advocates increases survivors' ability to access and navigate other resources<sup>21, 22</sup>. These confidential resources should not be located within a Title IX office, due to the chilling effect this reporting structure can have on students who wish to request supportive measures. NASPA has stated in previous research that supportive measures provided to survivors and responding parties should not be provided by the same individual as it places both

---

<sup>18</sup> O'Brien, S., & Duffy, C. (2022, August 10). Nebraska teen and mother facing charges in abortion-related case that involved obtaining their Facebook messages. CNN.

<https://www.cnn.com/2022/08/10/tech/teen-charged-abortion-facebook-messages/index.html>

<sup>19</sup> Germain, L. J. (2016). *Campus sexual assault: College women respond*. JHU Press.

<sup>20</sup> Henninger, A. L., Iwasaki, M., Carlucci, M. E., & Lating, J. M. (2020). Reporting sexual assault: Survivors' satisfaction with sexual assault response personnel. *Violence against women*, 26(11), 1362-1382.

<https://doi.org/10.1177/1077801219857831>

<sup>21</sup> Campbell, R. (2006). Rape survivors' experiences with the legal and medical systems: Do rape victim advocates make a difference?. *Violence against women*, 12(1), 30-45. <https://doi.org/10.1177/1077801205277539>

<sup>22</sup> Patterson, D., & Tringali, B. (2015). Understanding how advocates can affect sexual assault victim engagement in the criminal justice process. *Journal of Interpersonal Violence*, 30(12), 1987-1997.

<https://doi.org/10.1177/0886260514552273>

parties at risk of coming into contact while seeking supportive services needed to persist at the institution<sup>23</sup>.

## Restorative Justice

We appreciate the Department's willingness to keep informal resolution as an option for use in sex-based harassment cases<sup>24</sup>. The inclusion of informal resolutions is a recognition of the range of options that a complainant may wish to explore, and also recognition of the significant training and expertise that many student affairs practitioners have developed in these forms of resolution. In many instances, survivors do not wish to engage in formal investigative processes, and would rather seek accommodations for themselves and notify the respondent of wrongdoing without significant consequences for the accused. According to one study, "students have indicated that having options that feel less adversarial made them come forward and report."<sup>25</sup> While the option to formally report should be available to any complainant, this isn't the first choice for some students who have experienced harm.

We especially appreciate the fact that the Department took note of recommendations made by NASPA in its comments to the Department's 2020 regulations asking the Department to require that anyone conducting informal resolutions processes be properly trained<sup>26</sup>. The importance of training is also echoed in a recent research review of restorative justice (RJ) best practices. "It was also clear that specialized training in RJ, sexual misconduct, and gender issues must be required for RJ facilitators who want to work with SV populations."<sup>27</sup>

We recommend that the Department distinguish between restorative justice and other types of informal resolution options. We also encourage the Department to disallow mediation and arbitration as permissible forms of informal resolution. "RJ contrasts strongly with mediation. The latter is a collaborative adjudication process that instead emphasizes neutrality for all parties involved, whereas RJ requires the acknowledgment that the responsible person did indeed cause harm."<sup>28</sup>

In addition to requiring training for anyone conducting informal resolutions, we also ask the Department to require that any informal resolution be initiated by the complainant. The experts at the Campus PRISM Project identify this as a best practice when utilizing restorative justice as an informal resolution option in sexual misconduct cases in college settings. "If the

---

<sup>23</sup> Henkle, J., Dunlap, J., & Tabachnik, J. (2022, January). Expanding the Frame: Institutional Responses to Students Accused of Sexual Misconduct. *NASPA-Student Affairs Administrators in Higher Education*. <https://www.naspa.org/report/expanding-the-frame-institutional-responses-to-students-accused-of-sexual-misconduct>

<sup>24</sup> 87 Fed. Reg. at 41453 (proposed 34. C.F.R. § 106.44(k)(1))

<sup>25</sup> Orcutt, M., Petrowski, P. M., Karp, D. M., Draper, J. (2020, June 6). Restorative justice approaches to the informal resolution of student sexual misconduct. *Journal of College & University Law*, 45, 204. <https://digital.sandiego.edu/soles-faculty/15>

<sup>26</sup> NASPA (2019, January 27). NASPA's Comments in Response to Proposed Title IX Rule. <https://www.naspa.org/files/dmfile/NASPA-TIX-Public-Comments-Final-20190130.pdf>

<sup>27</sup> Burns, C. J., & Sinko, L. (2021). Restorative Justice for Survivors of Sexual Violence Experienced in Adulthood: A Scoping Review. *Trauma, Violence, & Abuse*. <https://doi.org/10.1177/15248380211029408>

<sup>28</sup> Burns, C. J., & Sinko, L. (2021). Restorative Justice for Survivors of Sexual Violence Experienced in Adulthood: A Scoping Review. *Trauma, Violence, & Abuse*. <https://doi.org/10.1177/15248380211029408>

survivor/victim chooses RJ, then the accused student is asked to participate.”<sup>29</sup> Allowing a complainant to choose to initiate an informal resolution process serves several protective functions. It re-centers the harmed party in the resolution process, providing them with a sense of agency over the next steps in their process. It also prevents respondents from attempting to use informal resolution processes as a way to escape responsibility for the harm caused. It may also prevent institutions from attempting to coerce complainants into less time-intensive, informal processes that do not meet the complainants’ needs.

## Training

We support the Department’s requirement for training for those involved in Title IX cases at institutions<sup>30</sup>. Training is an important aspect of ensuring that both respondents and complainants in Title IX cases are treated fairly and that their needs are met throughout the duration of an investigation process. However, we share the Academic Alliance for Survivor Choice in Reporting Policies (ASC)’s comments to the Department expressing concern that the expanded definition of responsible employees under the new regulations does not coincide with corresponding training on how to appropriately respond to a disclosure. The ASC comments urge the department to “require all other employees who directly learn about possible sex discrimination experienced by a student or employee to provide supportive intervention” which can include options for officially reporting to the Title IX Coordinator and “contact a designated confidential employee/service trained in victim/survivor support that will then be responsible for connecting with that person, providing expert support, and ensuring they can make informed decisions about reporting and/or seeking supportive measures.”<sup>31</sup> This level of supportive intervention would require a different type of training than is currently required by the Department in the proposed regulations<sup>32</sup>. This type of training will ensure that anyone who is defined as a responsible employee has the proper training to support students who disclose to them.

Additionally, under the 2020 regulations and the current regulations, institutions are required to post their training materials to the institution’s website<sup>33</sup>. The specifics of what must be posted, however, are vague and lead to institutions posting varying levels of information accessible to students, parents, and other stakeholders. We urge the Department to propose the specific information about training that must be posted whether that includes slides containing content, or simply certificates of completion that indicates who was trained on what topics, for example. We are supportive of the Department requiring such transparency on the training completed by various stakeholders in the Title IX process, but further guidance from the Department will make the content of the information being shared equitable across institutions.

---

<sup>29</sup> Karp, D., Shackford-Bradley, J., Wilson, R., & Williamsen, K. (2016). *Campus Prism: A Report on Promoting Restorative initiatives for Sexual Misconduct on College Campuses*. *Saratoga Springs, NY: Skidmore College Project on Restorative Justice*.

[https://www.sandiego.edu/soles/documents/center-restorative-justice/Campus\\_PRISM\\_Report\\_2016.pdf](https://www.sandiego.edu/soles/documents/center-restorative-justice/Campus_PRISM_Report_2016.pdf)

<sup>30</sup> 87 Fed. Reg. at 41428 (proposed 34. C.F.R. § 106.8(d))

<sup>31</sup> See

<https://psychology.unl.edu/sashlab/ASC%20Response%20Letter%20to%20Proposed%20Title%20IX%20Mandatory%20Reporting%20Regs.pdf>

<sup>32</sup> 87 Fed. Reg. at 41428 (proposed 34 C.F.R. § 106.8(d)(1))

<sup>33</sup> 87 Fed. Reg. at 41431 (proposed 34 C.F.R § 106.8(d))

## **Live Hearing Procedures**

We support the removal of the requirement for live hearings<sup>34</sup> and appreciate the flexibility that this change gives, particularly for small colleges and universities and community colleges that may not have the resources or staffing required to conduct these hearings. Additionally, there is evidence that the process of cross-examination at live hearings can be harmful to both parties and that the use of live hearings that include cross-examination may have a chilling effect on a survivor's decision to report an incident of sexual harassment.

While we appreciate these changes, we also recognize the need for both parties to have the opportunity to have both a process advisor and a support person present throughout the investigation and hearing process. As described in a report recently published by NASPA, "When survivors are asked to select just one advisor, the decision often leads them to make difficult choices when engaging in an already difficult process. Having access to only one advisor often forces students to select between a person who can emotionally support them, such as an advocate, or someone who knows the institutional process or is familiar with cross-examination, like a lawyer. If an institution chooses to continue with cross-examination as a practice, [...] the advisor will need to take on the role of cross-examiner. If the survivor has chosen someone who may be there to emotionally support them, such as an advocate or a family member, that person may not be trained to cross-examine the other party, reinforcing the choice for the survivor to choose between emotional support and process support. By allowing parties to choose two advisors, this forced choice is eliminated and parties are allowed multiple levels of support in a process that does not always feel supportive."<sup>35</sup>

Unfortunately, not all higher education institutions allow for multiple persons to be present throughout the investigation and hearing process within their policies. Currently, § 106.46(e)(3) outlines that both parties should be given the same opportunity to have someone other than the advisor of choice present, however we urge the Department to clarify this further and to require institutions to allow parties to have both an advisor of choice and a support person present during live hearings.

## **Request for Religious Exemption**

We believe an important part of supporting transgender and gender non-binary students involves their ability to make informed decisions about where to enroll. An important aspect of this had been included under previous Department guidance that required institutions to submit a letter to the Department to request religious exemption from complying with Title IX. The Department previously made a list of those institutions who had requested exemption from Title IX publicly available. The current Title IX guidance published in 2020 removed the requirement to proactively request exemption from the Department.<sup>36</sup> As stated in comments made by NASPA to the Department in 2019, we maintain that the Department should again require this proactive request from institutions to the Department. We highly urge the Department to

---

<sup>34</sup> 87 Fed. Reg. at 41578 (proposed 34 C.F.R. § 106.46(g))

<sup>35</sup> Berman, R., Dunlap, J., & Henkle, J. E. (Forthcoming). A snapshot of the current state of Title IX: Recommendations for state and federal policymakers. NASPA - Student Affairs Administrators in Higher Education .

<sup>36</sup> 20 U.S.C. 1681(a)(1)–(9).



reinstate the requirement for faith-based institutions to seek affirmation of an exemption under Title IX in the interest of ensuring transparency for minoritized populations.

We thank the Department for the opportunity to comment on the Title IX proposed rule. The undersigned student affairs associations represent the largest swath of higher education employees responsible for preventing and responding to sex-based discrimination at institutions. We appreciate the time and effort the Department has committed to drafting the proposed rule and to considering the recommendations outlined above.

**ACPA – College Student Educators International<sup>37</sup>**

**Association of College and University Housing Officers – International (ACUHO-I)<sup>38</sup>**

**Association of College Unions, International (ACUI)<sup>39</sup>**

**Association for Student Conduct Administration (ASCA)<sup>40</sup>**

**NASPA – Student Affairs Administrators in Higher Education<sup>41</sup>**

**National Association of Colleges and Employers (NACE)<sup>42</sup>**

**NIRSA: Leaders in Collegiate Recreation<sup>43</sup>**

**NODA - Association for Orientation, Transition, and Retention in Higher Education<sup>44</sup>**

---

<sup>37</sup> ACPA is a leading national and international association committed to advancing the growth, development, and success of college students and campus communities through advocacy, education, and research.

Membership: 6,000+ from 1,200 public and private institutions internationally

<sup>38</sup> ACUHO-I is the leading organization of choice for campus housing and residence life professionals.

Membership: Over 17,000 campus housing professionals who work at more than 1,000 campuses around the globe, as well as more than 250 companies and organizations whose products and services support the profession's needs

<sup>39</sup> ACUI is the professional home to campus community builders who focus on the work within the college unions and student activities field. The Association strives to provide an inclusive, welcoming community for all those who choose to belong. Membership: Campus populations of 450 higher education institutions

<sup>40</sup> ASCA is the leading voice for student conduct in higher education. Membership: 3,000+ higher education student conduct administrators at approximately 1,200 colleges and universities in all 50 states

<sup>41</sup> NASPA is the leading association for the advancement, health, and sustainability of the student affairs profession. Membership: 15,000+ individuals and 1,100 institutions in all 50 states, 25 countries, and 8 U.S. Territories

<sup>42</sup> NACE is the leading source of information on the employment of the college educated, and forecasts hiring and trends in the job market; tracks starting salaries, recruiting and hiring practices, and student attitudes and outcomes; and identifies best practices and benchmarks. Membership: 14,300 collective individual and institutional members

<sup>43</sup> NIRSA comprises and supports higher education professionals in recreation and wellbeing. Membership: 3,500 members in all 50 states and Canada

<sup>44</sup> NODA is an inclusive community where we enhance and evaluate orientation, transition, and retention practices in higher education that cultivate the professional development and education of student leaders, graduate students, practitioners, and scholars. Membership: 1,130 professional members representing 580 institutions.