



Title IX Positions in Higher Education

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Introduction

Title IX staff play a critical role in ensuring compliance with federal regulations, fostering safe and inclusive campus environments, and addressing issues related to gender equity and sexual misconduct. Adequate staffing and institutional support for these positions are essential for addressing campus needs proactively, mitigating the risks of non-compliance, and upholding the institution's Title IX responsibilities. This report examines the staffing trends of Title IX positions in higher education, highlighting the importance of properly resourcing these roles to meet evolving Title IX regulations and maintain campus safety and equity.

The Department of Education's Title IX Regulations

Since the Education Amendments of 1972 were signed into law, the Title IX regulations have served as the fundamental law enforcing nondiscrimination mandates based on sex for institutions of higher education that receive federal funding. The law as written is simple, stating that “No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” As such, the Title IX regulations have had a tremendous impact on equal opportunity for women, allowing women to enroll in certain institutions that previously barred their enrollment, to participate in certain educational programs that previously barred their inclusion, and to receive support from institutions to remediate cases of sexual harassment, among other successes.

Since its regulations were first issued in 1975, Title IX has been amended through the regulatory process and guidance issued by the Department of Education several times. Since 2020, the regulations have been updated twice: the first occurring under the Trump administration, and most recently under the Biden administration.^{1,2} Under both administrations, the Title IX regulations were greatly expanded to address sexual harassment and assault as a form of sex discrimination, resulting in complex and expansive procedures and requirements for institutions to follow to address complaints stemming from sexual harassment or abuse. In both instances, institutions were faced with massive overhauls of their Title IX procedures, making it increasingly important they have a team of Title IX experts on their campus to ensure compliance.

¹ U.S. Department of Education, Office for Civil Rights. (2020, May 19). [*Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*](#), 34 CFR Part 106.

² U.S. Department of Education, Office for Civil Rights. (2024, April 29). [*Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*](#), 34 CFR Part 106.

With the incoming Trump administration, the higher education community largely expects that the Biden administration's 2024 Title IX rule will be repealed in favor of reimplementing the Trump administration's 2020 Title IX regulations.³ Again, this complex and changing Title IX landscape only further demonstrates the need for institutions to hire and retain dedicated Title IX personnel to ensure compliance with the Title IX rules.

Research Purpose

Given the evolving landscape of the Title IX regulations, institutions will need to reevaluate their Title IX policies and prepare for the changing responsibilities that may be required of Title IX staff. The complex and changing nature of these regulations underscores the importance of having dedicated and well-supported Title IX staff. Title IX staff are crucial to ensuring compliance with federal regulations, fostering safe and inclusive campus environments, addressing issues of gender equity and sexual misconduct, and educating campus communities on Title IX rights. To better understand how higher education institutions are currently positioned to manage these demands, this report explores the Title IX staff that currently exist in higher ed, focusing on their placement, frequency, composition, and pay equity, along with recommendations for strengthening institutional workforces to meet Title IX compliance requirements.

Where Are Title IX Staff Located Within Institutions?

Title IX legislation requires institutions that receive federal funding to designate at least one employee to coordinate compliance with Title IX law.⁴ However, the structure and staffing of the Title IX office varies. In April 2024, CUPA-HR conducted a poll with higher education institutions, asking: Where does your Title IX office/officer currently reside?⁵

Figure 1 illustrates the results of the poll, showing where Title IX staff are currently located within higher education institutions. Results show most Title IX staff are located within either Human Resources (29%) or Student Affairs/Dean of Students/Student Services (28%). This suggests a strong association between Title IX responsibilities and the core functions of employee relations, student services, and campus climate management. Human

³ The Biden administration's Title IX regulations were facing legal challenges that resulted in the preliminary injunctions blocking ED from enforcing the rule in 26 states and hundreds of schools in other states that did not challenge the rule. In the 26 states and schools under the scope of the preliminary injunctions, the Trump administration's 2020 Title IX regulations remain in effect.

⁴ U.S. Department of Education, Office for Civil Rights. (2021, April). [Title IX and Sex Discrimination](#).

⁵ Data was collected during CUPA-HR's webinar, [The 2024 Title IX Regulations: What You Need to Know](#) (2024, April 30), and through [CUPA-HR Connect](#), with participation from 432 institutions.

Resources and Student Affairs are the most common departments for Title IX staff regardless of Carnegie Classification.⁶

The next most common placements for Title IX staff are within the Office of Compliance (11%) and Diversity, Equity, and Inclusion (11%). These departments reflect an association between Title IX staff and broader compliance and equity work. Fewer Title IX staff are located within Legal Affairs (5%), the President's Office (5%), Academic Affairs/Provost (4%), or Business Office/Operations/University Affairs (3%).

2024 CUPA-HR Research

Current Departmental Placement of Title IX Offices/Officers

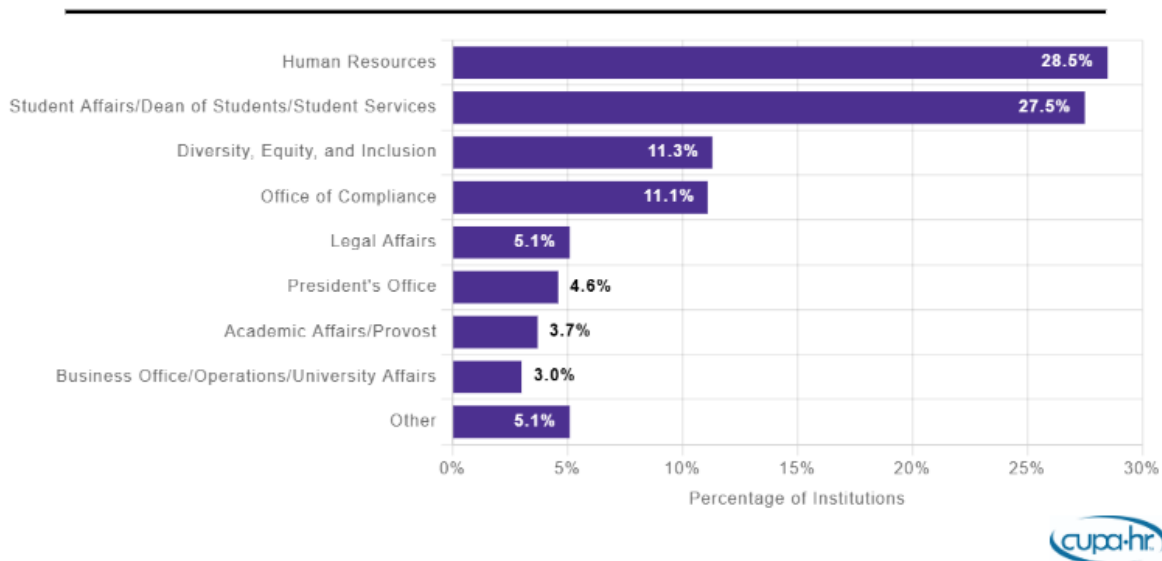


Figure 1. Current Departmental Placement of Title IX Offices/Officers

Title IX Positions

Title IX staff vary not only in the department where they are located but also in the scope of their responsibilities. At some institutions, particularly smaller ones or those with limited resources, a Title IX officer's responsibilities may be assigned as part of their broader position, such as a human resources officer, dean of students, or legal affairs staff member. In contrast, other institutions may have dedicated Title IX staff whose sole focus is Title IX compliance.

To better understand Title IX staffing at institutions, this report analyzes data on positions dedicated to Title IX responsibilities. As part of its annual signature surveys, CUPA-HR

⁶ [The Carnegie Classification of Institutions of Higher Education](#) (n.d.). About Carnegie Classification.

collects data on three Title IX-related positions in the *Professionals in Higher Education Survey*:⁷

- **Heads of Institutional Title IX Compliance** are responsible for coordinating the institution's compliance with federal and state discrimination and sexual harassment laws. Responsibilities may include providing educational programs regarding discrimination and sexual harassment prevention; responding to, investigating, and seeking resolution to allegations of discrimination and sexual harassment; selecting and overseeing sexual harassment advisors who serve as additional information resources on issues of sexual harassment; and training student peer educators to facilitate discussions with other students on sexual harassment. With regard to the OCR letter of April 4, 2011, expanding upon Title IX sexual harassment and violence guidelines, heads also oversee all Title IX complaints and reports of student sexual harassment, sexual violence, and related allegations of misconduct.⁸ Heads identify and address any systemic problems relating to complaints, work with other departments to ensure Title IX policies are communicated to all constituencies, and assist law enforcement personnel in handling reports and complaints of sexual violence and related misconduct.
- **Deputy Heads of Institutional Title IX Compliance** are responsible for one or several areas of Title IX compliance under the direction of the head.
- **Title IX Investigators** conduct investigations under the oversight of the head of institutional Title IX compliance. Investigators draft reports and findings for institutional decision-making.

The Evolution of Title IX Positions

Overall Trends

Analyzing data from the *CUPA-HR Professionals in Higher Education Survey* from academic year 2019-20 to 2023-24, we explored how many institutions have Title IX-specific positions and how this has changed over the past five years.⁹ Although CUPA-HR has collected data on heads of institutional Title IX compliance since 2012-13, 2019-20 marked the first year we had data on all three Title IX-related positions. This includes Title IX investigators, with

⁷ Data are collected in CUPA-HR's *Professionals in Higher Education Survey* with an effective date of November 1 of each academic year. Analyses include only non-profit institutions of higher education.

⁸ U.S. Department of Education, Office for Civil Rights. (2011, April 4). *Dear Colleague Letter: Sexual Violence*, 34 CFR Part 106.

⁹ CUPA-HR. (2024). *Professionals in Higher Education Survey, 2019-20 to 2023-24* [Data set].

data collection beginning in 2019-20, and deputy heads, starting in 2018-19. As a result, this five-year span offers the most comprehensive view of Title IX staffing trends.

Over the past five years, the presence of dedicated Title IX positions at institutions has become increasingly common. Figure 2 illustrates the percentage of institutions with at least one dedicated full-time Title IX position by year. In 2019-20, only a third of institutions reported having at least one dedicated full-time Title IX position, but by 2023-24, 43% of institutions had at least one Title IX position.

This increase over the five-year timespan may be attributed to the changing regulatory landscape of the Title IX rules, resulting from the growing public awareness of issues related to sexual misconduct and increased institutional accountability to address such behavior. As discussed in the introduction, between 2020 and 2024, the Department of Education under the Trump and Biden administrations issued two separate regulations that massively amended the existing Title IX regulations to address sexual harassment and assault as a form of sex discrimination, which created new and complex procedures and requirements for institutions to formally and informally address sex discrimination complaints stemming from sexual harassment or abuse.^{10,11} As a result, institution leaders likely felt the need to hire or designate dedicated Title IX professionals to ensure institutions could comply with the new regulatory requirements for handling Title IX grievance procedures related to sexual harassment.

Despite the growth in Title IX staffing, more than half of institutions (56%) still do not have a designated full-time Title IX position. In many of these institutions, Title IX responsibilities are integrated into broader roles, with staff combining Title IX duties with responsibilities in areas such as human resources or student affairs. This arrangement requires staff to balance Title IX compliance duties alongside their primary responsibilities, potentially leading to challenges in fully addressing the complexities of Title IX regulations. Although this approach may help institutions with limited resources, it can also strain existing staff and dilute the focus needed to ensure compliance.

By Position

Figure 2 (toggle to examine data by position) also shows that each of the three positions has become increasingly more common at institutions over the past five years. In 2023-24,

¹⁰ U.S. Department of Education, Office for Civil Rights. (2020, May 19). [*Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*](#), 34 CFR Part 106.

¹¹ U.S. Department of Education, Office for Civil Rights. (2024, April 29). [*Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*](#), 34 CFR Part 106.

institutions were most likely to have full-time heads of institutional Title IX compliance positions (31%), whereas only 12% of institutions report having a deputy head of institutional Title IX compliance, and 16% report having a Title IX investigator.

The percentage of institutions with a full-time head of institutional Title IX compliance position increased from 26% in 2019-20 to 31% of institutions in 2023-24. Although less common, the percentage of institutions with a deputy head of institutional Title IX compliance or a Title IX investigator also grew substantially, increasing from 7% to 12% and 9% to 16%, respectively, over time. These data indicate that the head of institutional Title IX compliance is the most common Title IX position reported at institutions; however, the roles of deputy head and Title IX investigator are becoming increasingly prevalent.

2019-20 to 2023-24 Professionals in Higher Education Surveys
Institutions With a Title IX Position by Year

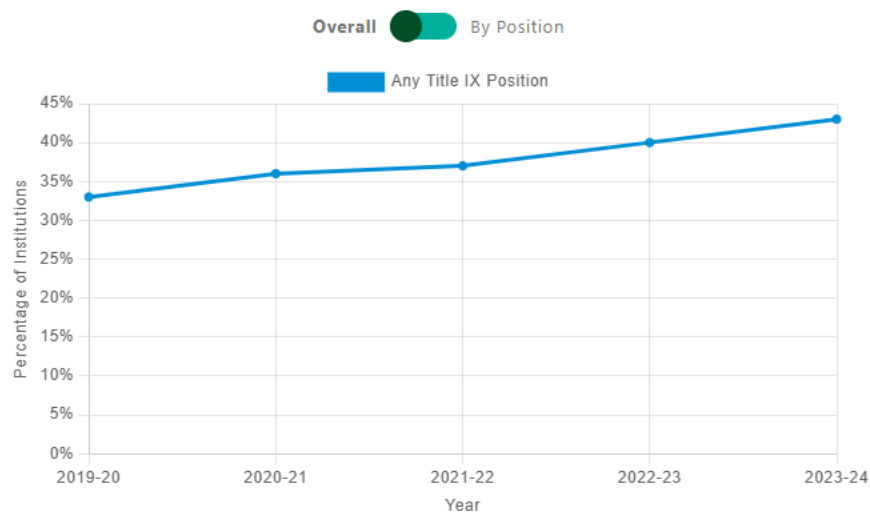


Figure 2. Institutions With a Title IX Position by Year

Title IX Positions by Carnegie Classification

Figure 3 displays the percentage of institutions with Title IX positions by Carnegie Classification in 2023-24. Title IX positions are most common at doctoral institutions. Nearly two-thirds (64%) of doctoral institutions report having at least one of the three Title IX positions. This was followed by 45% of baccalaureate institutions and 39% of master's institutions. In contrast, fewer than one-fifth (19%) of associate's colleges reported having any of the three Title IX positions.

When examining specific positions by Carnegie Classification, the head of institutional Title IX compliance is the most common Title IX position across all institution classifications, though position prevalence varied by institutional classification. Head of institutional Title IX compliance is most common at doctoral institutions, with 43% reporting this position. In comparison, 38% of baccalaureate institutions and 27% of master's institutions report having this role. The position is much less common at associate's institutions (11%).

Deputy heads of institutional Title IX compliance and Title IX investigators are also more common at doctoral institutions compared to other institutional classifications. One-third of doctoral institutions report having at least one Title IX investigator, and one-fifth report having at least one deputy head of institutional Title IX compliance. In contrast, fewer than 11% of baccalaureate and master's institutions reported having either of these positions.

Examining Title IX staffing by institutional classification provides insights into how different types of institutions staff for compliance. The distribution in Figure 3 suggests that doctoral institutions are more likely to have dedicated Title IX staff compared to other classifications, likely due to heightened federal compliance demands and more complex Title IX challenges. Understanding these differences allows institutions to benchmark their Title IX support against peers and supports advocacy for targeted funding and policy adjustments.¹²

¹² To benchmark the number of Title IX staff against a custom comparison group of institutions, subscribe to [Professionals DataOnDemand](#).

2023-24 Professionals in Higher Education Survey
Institutions With a Dedicated Title IX Position by Classification

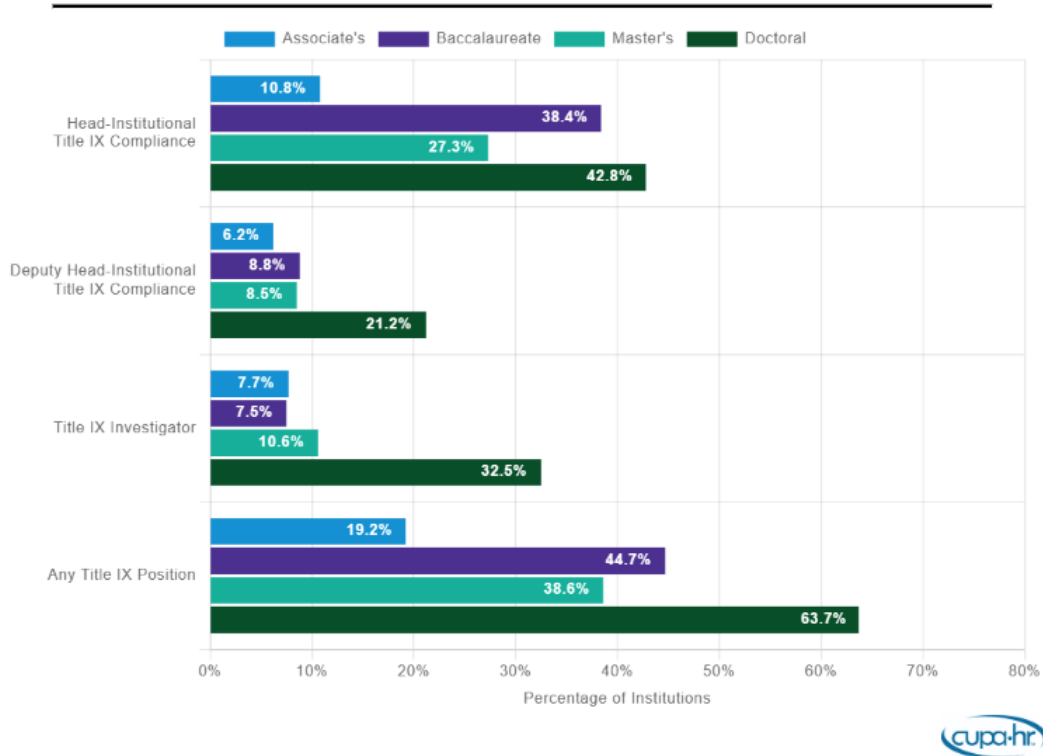


Figure 3. Institutions With a Title IX Position by Classification

Title IX Workforce Size

The previous two sections focused on whether an institution had at least one Title IX position; however, some institutions may have multiple Title IX staff. This section examines the size of the Title IX workforce, exploring how many staff members are dedicated to Title IX responsibilities within an institution.

Growth of the Title IX Workforce

Figure 4 shows the total number of Title IX staff by year. Over the past five years, the number of Title IX positions reported by institutions in our survey rose from 542 to 746, marking a 38% increase. Deputy heads of institutional Title IX compliance grew by 58%, and Title IX investigators saw an 85% rise, whereas heads of institutional Title IX compliance increased by only 7%. Despite the substantial growth in deputy heads and investigators, these roles remain far less common than heads of institutional Title IX compliance.

2019-20 to 2023-24 Professionals in Higher Education Surveys
Number of Title IX Staff by Year

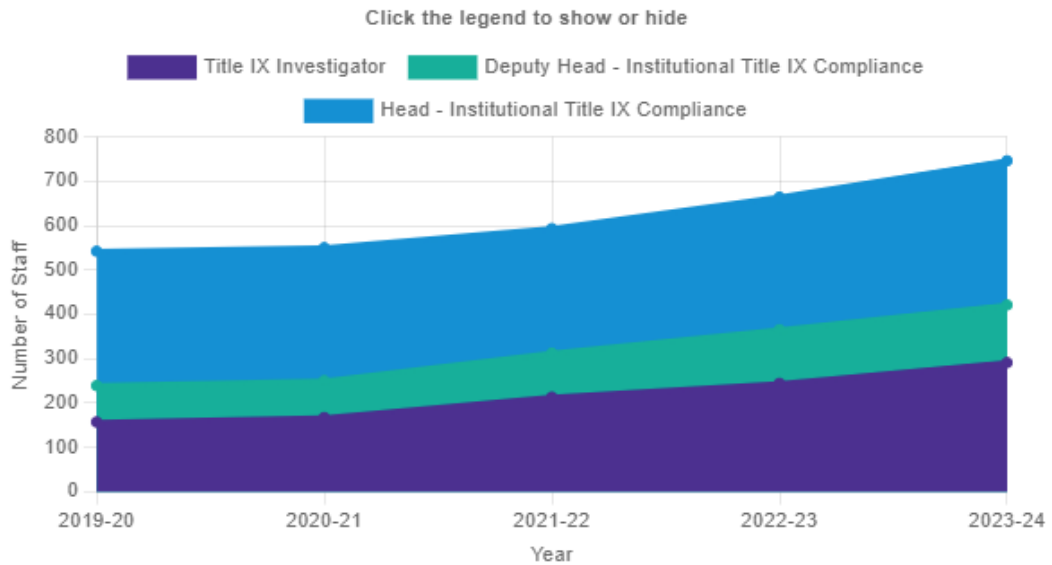


Figure 4. Number of Title IX Staff by Year

Multiple Title IX Staff Within an Institution

Most institutions (56%) have no dedicated full-time Title IX staff and a little over a quarter (26%) have just one Title IX position (Figure 5). A smaller portion — 17% — employ two or more dedicated Title IX staff members. For institutions with only one Title IX staff member, the head of institutional Title IX compliance is by far the most common position, accounting for 69% of these cases. For those with multiple Title IX staff, nearly three-quarters (74%) include a head of institutional Title IX compliance, often accompanied by a Title IX investigator. This trend underscores the central role of the head of institutional Title IX compliance, whether as the sole position or as part of a larger Title IX team.

**2023-24 Professionals in Higher Education Survey
Number of Title IX Positions at Institutions**

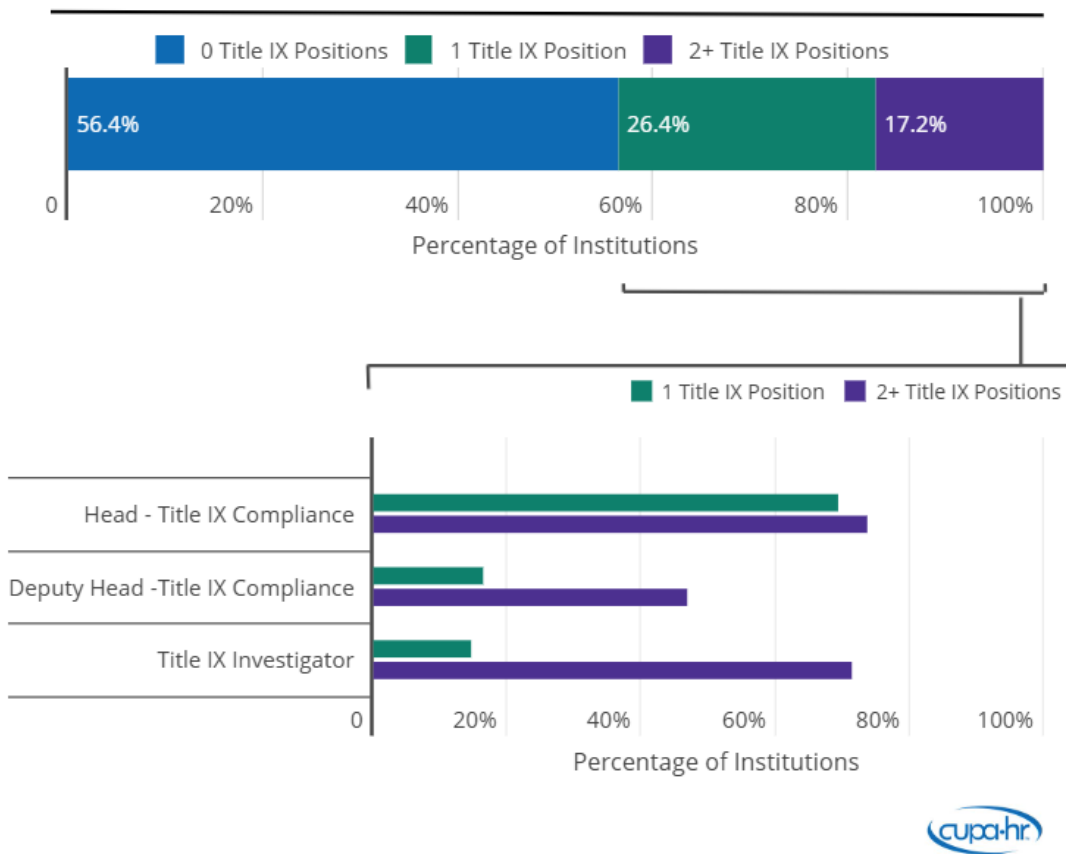


Figure 5. Number of Title IX Positions at Institutions

Figure 6 illustrates the percentage of institutions, by classification, that have two or more Title IX positions. Doctoral institutions are most likely to have multiple Title IX staff members. More than one-third (36%) of doctoral institutions have multiple Title IX positions at their institution. Doctoral institutions that have at least one Title IX position have an average of 2.2 Title IX positions per institution. In contrast, fewer than 12% of institutions in other classifications have two or more Title IX staff members, with an average of 1.3 to 1.5 positions at institutions with at least one Title IX position.

Institutions With Two or More Title IX Positions by Classification

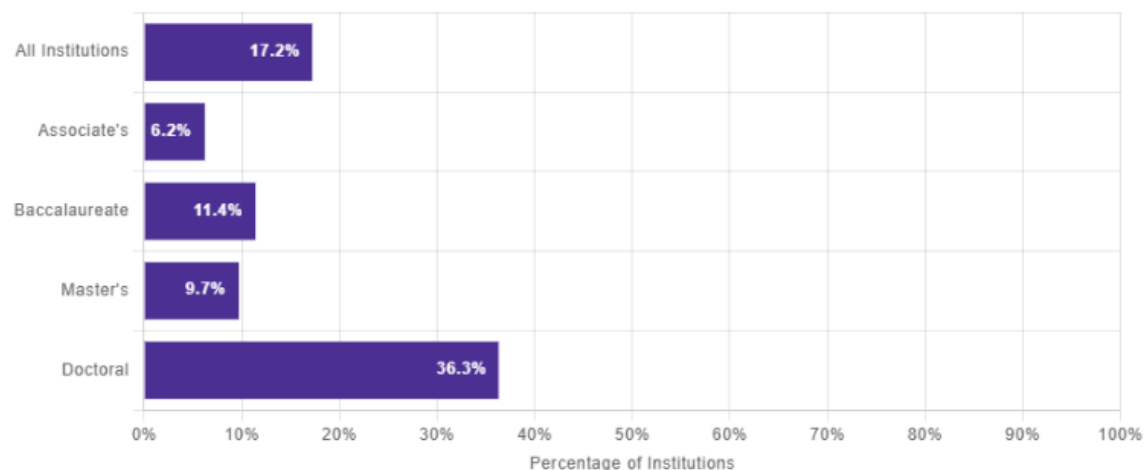


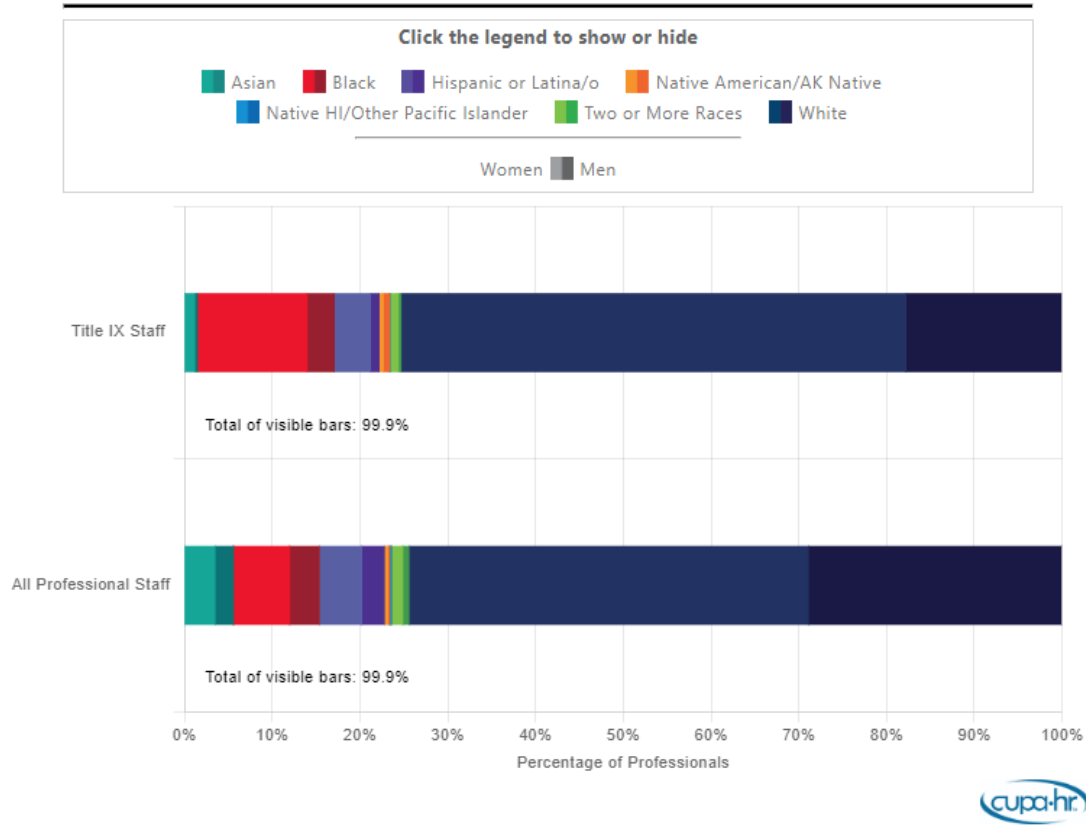
Figure 6. Institutions With Two or More Title IX Positions by Classification

Title IX Positions Are Primarily Held by Women

Women hold more than three-fourths (77%) of Title IX positions (Figure 7). This is notably higher than women’s 62% representation across all professional positions in higher education. White men, on the other hand, are less represented in these positions, comprising just 18% of Title IX staff compared to 29% of all professional positions.

Black Title IX staff, particularly Black women, have higher representation in Title IX positions compared to the professional workforce. Black women make up 13% of all Title IX staff, which is more than double their representation (6%) among professional staff overall. In contrast, Asian professionals are underrepresented in Title IX positions, holding only 2% of these positions compared to 6% of all higher education professionals.

Composition of Title IX Staff by Gender and Race/Ethnicity



Note: Total of all visible bars may not add up to 100% due to rounding.

Figure 7. Composition of Title IX Staff by Gender and Race/Ethnicity

Title IX Staff Salaries and Pay Equity

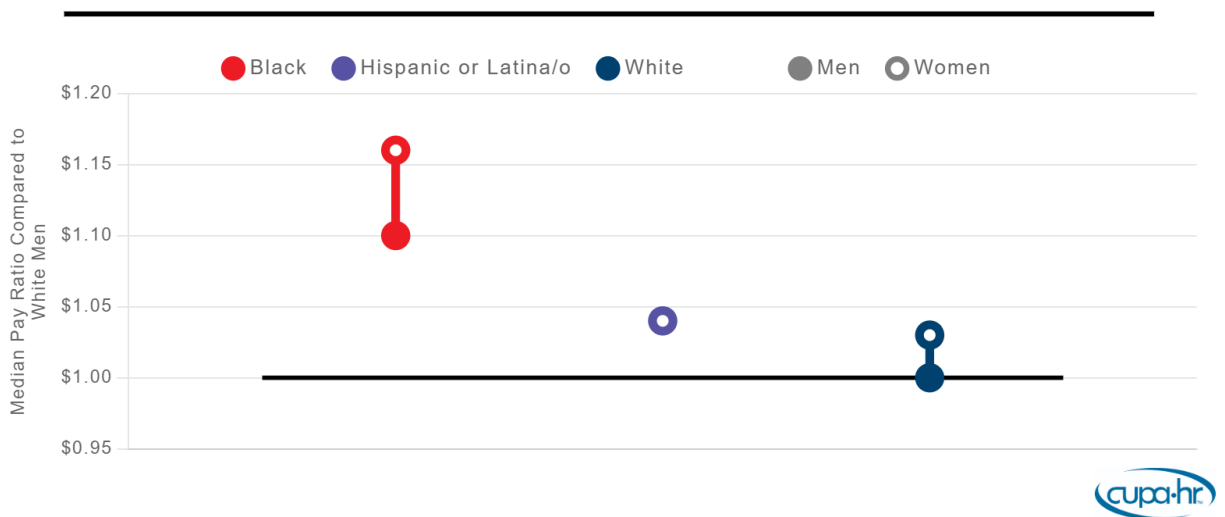
Median salaries for Title IX positions reflect the level of responsibility associated with each position. Heads of institutional Title IX compliance, who oversee all Title IX complaints and reports, make a median salary of \$96,714. Deputy heads, who manage specific areas of Title IX compliance under the direction of the head, follow with a median salary of \$84,931. Title IX investigators, essential for conducting investigations and preparing reports to support institutional decision-making, make a median salary of \$75,000. Notably, each of these positions has a higher median salary than the overall median for professional positions across higher education (\$66,000).

Unlike many other areas of the higher ed workforce, women and people of color who hold Title IX positions are paid equitably compared to White men (Figure 8). This is noteworthy considering this is not the case for women and people of color in professional positions

overall.¹³ Black women not only have greater representation among Title IX staff relative to other professional positions, but they are also paid more than equitably, making \$1.16 for every \$1.00 paid to White men. This is striking considering that, overall, Black women in professional roles are paid \$0.98 for every \$1.00 paid to White men. Black men, Hispanic or Latina women, and White women in Title IX positions also have higher median salaries than White men, making \$1.10, \$1.04 and \$1.03, respectively, for every \$1.00 paid to White men. This may indicate an effort by higher ed institutions to attract and retain women and people of color into these positions.

2023-24 Professionals in Higher Education Survey

Median Pay Ratios for Title IX Staff by Gender and Race/Ethnicity



Note: Because pay ratio data is sensitive, we take extra care to avoid generalizing from small sample sizes. Those intersectional groups that are deemed too small are not included in the results displayed.

Figure 8. Median Pay Ratios for Title IX Staff by Gender and Race/Ethnicity

Conclusions

Most Title IX staff are housed within human resources or student affairs

departments. This suggests a strong alignment between Title IX responsibilities and key institutional functions such as employee relations, student services, and campus climate management. Their departmental placement is important, as it may affect the resources and support they receive, as well as their broader influence on institutional policies related to equity, inclusion, and compliance.

¹³ CUPA-HR. (2024). [Professionals Composition and Pay Equity by Gender and Race/Ethnicity.](#)

The majority of institutions do not have a dedicated full-time Title IX position. The total number of Title IX staff has grown by 38% over the past five years. Yet, as of 2023-24, 56% of institutions still lack a dedicated full-time Title IX position. These institutions are instead integrating Title IX responsibilities into broader roles, such as human resources or student affairs positions. This approach, while common, may limit an institution's ability to fully meet the new and increasing demands of Title IX regulations and maintain a safe, inclusive campus environment, as staff must balance these duties alongside other responsibilities. Furthermore, the burden of managing Title IX compliance in addition to other tasks can contribute to employee burnout and turnover, as individuals may feel overwhelmed by the scope of their workload. Ensuring sufficient staffing for Title IX may be key to not only regulatory compliance but also to improving employee retention by reducing role overload.

Dedicated Title IX positions are most prevalent at doctoral institutions. Nearly two-thirds (64%) of doctoral institutions report having at least one of the three dedicated Title IX positions. Deputy heads of institutional Title IX compliance and Title IX investigators are also considerably more common at doctoral institutions compared to other classifications. This may be due to the larger size and scope of doctoral institutions, which may require additional Title IX staffing to enforce the new regulations.

The head of institutional Title IX compliance remains the most common Title IX position, though its growth has been the slowest among Title IX roles. Although the head of institutional Title IX compliance is still the most frequently reported role, the position's growth from 2019-20 to 2023-24 lags behind the expansion of deputy heads and Title IX investigators. The rise in the deputy head and Title IX investigator positions likely reflects the growing complexity of Title IX cases and the need for more comprehensive institutional support to handle them effectively. Given the complex, shifting regulatory landscape, this trend of growth likely will continue, as institutions increasingly recognize the need for specialized staff to navigate the intricacies of Title IX regulatory compliance.

Thirty-nine percent of institutions with at least one Title IX position report having more than one Title IX staff member. Multiple Title IX staff within an institution is especially frequent at doctoral institutions. Dedicated Title IX staffing teams can help institutions more effectively manage growing compliance responsibilities.

The primary incumbents in Title IX positions are women, with a particularly notable representation of Black women. Women occupy more than three-fourths (77%) of these positions, which stands out against their 62% representation across professional positions in higher education. Furthermore, representation of Black women is more than double

their representation among other higher education professionals. This highlights a distinctive demographic composition within Title IX positions, reflecting an area of higher education where White and Black women hold a notable presence.

Unlike many other professional positions, Title IX staff are compensated equitably compared to White men. Salaries for Title IX staff progress with the level of responsibility they carry, with each Title IX position holding a higher median salary than the overall professional workforce median. Women and people of color in these positions have median salaries comparable to or exceeding those of their White male counterparts. These pay equity findings stand out within broader compensation trends for professionals in higher education, where pay disparities are more common.

Recommendations

If the Title IX regulations continue to change depending on which political party holds office, the demands for Title IX officers will likely increase. Given that more than half (56%) of institutions do not have a dedicated full-time Title IX position, leaders may want to consider reevaluating the scope of their Title IX officers' responsibilities and assess whether they have adequate staffing dedicated to Title IX compliance. Specifically, institutions will want to:

- **Reassess the breadth of Title IX officer responsibilities.** Institutions should ensure that their Title IX officers are given sufficient time and resources to focus on Title IX compliance, especially at institutions without a dedicated Title IX position. For example, since most Title IX officers are housed within human resources or student affairs, their responsibilities should be heavily focused on Title IX compliance rather than being diverted to HR or student affairs duties. The Title IX regulations are complex and require at least one individual to maintain oversight of an institution's Title IX compliance, which is a large role that can take time away from other job duties.
- **Increase Title IX staffing where needed.** Institutions without dedicated Title IX professionals should evaluate whether to create a dedicated Title IX position at their institution. Although there has been significant growth in the number of Title IX positions over the past five years, institutions should evaluate whether their current staffing levels are sufficient given the changing regulatory requirements.
- **Assess the best method for compliance based on legal and regulatory developments surrounding Title IX.** With the election of President Trump,

institutions may no longer be required to comply with the Biden administration's 2024 final rule. The Biden rule is facing legal challenges that the Trump administration will not defend against, and Trump's Department of Education could halt enforcement of the Biden administration's rule while it works to rescind it in favor of keeping the 2020 regulations intact.^{14,15} As a result, Title IX staff should prepare for compliance with either the 2020 Trump rule or any new regulations introduced by the Trump administration, as applicable. Title IX staff should also stay informed on the timeline for any new guidance to ensure institutional compliance with the prevailing standards.

Additional Resources

- [Title IX and Sexual Harassment](#) (CUPA-HR Toolkit)
- [The 2024 Title IX Regulations: What You Need to Know](#) (CUPA-HR Webinar)
- [ED Releases Final Title IX Rule](#)
- [U.S. Department of Education's Title IX Resources](#)
- [American Council on Education Resources on Title IX and Campus Sexual Assault Regulations](#)

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¹⁴ CUPA-HR. (2024, August 19). [Supreme Court Rejects Biden Administration's Request for Relief in Title IX Legal Challenges](#). *The Higher Ed Workplace Blog*.

¹⁵ CUPA-HR. (2024, August 1). [Title IX Rule Goes Into Effect in 24 States](#). *The Higher Ed Workplace Blog*.