

STUDENT IDENTITY

Revision Released: July 12, 2019



AACRAO

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Student Identity

AACRAO is a non-profit, voluntary, professional association of more than 11,000 higher education professionals representing approximately 2,600 institutions in more than 40 countries. Its commitment to the professional development of its members includes best practice guidance on admissions strategies to meet institutional diversity objectives, delivery of academic programs in innovative ways to meet the needs of a changing student body, and exemplary approaches to student retention and completion.

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THE WORK GROUP

AACRAO Values

Accountability -- Collaboration -- Inclusiveness -- Innovation -- Inquiry -- Integrity -- Learning

Established in 2017, the AACRAO Board of Directors charged the Student Identity Work Group with developing guidance for AACRAO members and their institutions on serving transgender students and students who wish to update their gender marker, change their legal name, use a chosen name, or designate a pronoun. The Work Group was also charged with developing guidance on appropriate methods of collecting, recording, and reporting of name and gender identity in student record systems. The guidance should address practices in the student admissions process as well as those in student records and registration. In addition, the guidance will consider impacts for other campus offices including but not limited to student financial aid, identity management (CIO), student housing, and student life.

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EXECUTIVE SUMMARY

AACRAO established the Student Identity Work Group in 2017 in response to the Departments of Education and Justice Title IX 2016 guidance to institutions indicating both federal agencies' intention to treat a student's gender identity as the student's sex for purposes of enforcing Title IX. Chaired by James Miller, Director of Admissions, University of Washington – Bothell, fourteen (14) AACRAO members representing diverse institutional types, positions, and geographic locations worked to:

- develop guidance for AACRAO members and their institutions on serving transgender students and students who wish to update their gender marker, change their legal name, use a chosen name, or designate a pronoun,
- develop guidance on appropriate methods of collecting, recording, and reporting of name and gender identity in student record systems,
- address practices in the student admissions process as well as those in student records and registration, and
- consider impacts for other campus offices including but not limited to student financial aid, identity management (CIO), student housing, and student life.

Inclusivity around gender expression has been a topic of discussion at AACRAO for some time. In November of 2012, a board-appointed task force on Institutional Gender Identity Recognition submitted a report with a series of recommendations. Further, an AACRAO 60-second Survey from March 2015 indicated the ability to track student identity preference was a hot and active topic for many institutions at that time with several institutions indicating the topic was under active discussion on their campus and/or about to be implemented as a change in practice.

In February 2017, the Departments of Education and Justice, under President Trump, moved to rescind the 2016 guidance's more fluid recognition of gender identity. Further, the Trump administration in October 2018 considered narrowing the definition of gender to what is listed on a person's birth certificate unless rebutted by reliable genetic evidence.

Given the compliance issues, the need for technical assistance and engagement with vendor platforms, and the stated AACRAO Values that promote inclusiveness within the expected Principles and Standards of Behavior, it is only appropriate for the association to support both members and the students they serve as they navigate these complex issues on their campuses.

The guidance and recommendations from the AACRAO Work Group provide practical next steps organized as good, better, and best to accommodate the varying student population needs, political environments, systems/technology use, and educational missions of U.S. colleges and universities while still arming practitioners in admissions and registrars offices who have a duty to serve and advocate for students in a manner that is inclusive and welcoming.

KEY RECOMMENDATIONS

NAMES

- The chosen first name policy should apply to all students. Each college or university must determine what name types will be utilized on degrees and credential bestowing documents, balancing student identity needs with the potential of fraud and misuse.

Student Identity

PRONOUNS

- It is important to realize that a student's stated identity with a college may be ahead or behind their stated identity in other parts of life. Collection of pronouns should be accompanied by a transparent statement as to how and where pronouns collected by the college will be used.

SEX AND GENDER

- It is critical that campuses understand the definitions of 1) sex at birth, 2) legal sex, and 3) gender identity, then seek to clarify what students are being asked to report and why with respect to sex and gender. Too often, students are asked questions about their sex and gender that are either for non-essential purposes or are the incorrect marker for the purpose the institution has in mind.

FINANCIAL AID AND SCHOLARSHIPS

- Address the barriers created by the Free Application for Federal Student Aid (FAFSA) for transgender or non-binary students, which can have an impact on their ability to gain access to student aid. The complications arise from the connection between the FAFSA and registration for Selective Service.

RECRUITMENT

- As with all recruitment, effective recruitment is definitionally inclusive for a broad variety of students. Communicate clearly with recruits what resources exist to meet their needs.

ADMISSIONS

- As the usual originating point for the official student record, the admissions office(s) at any institution must be committed to ensuring that applicants have as much control as possible in determining their own chosen first names and pronouns. For institutions with a decentralized admission model, institutional-wide policies must be developed and enforced to ensure that students have the same, positive experience regardless of their level or field of study. Not only is this commitment important for reasons of accuracy and integrity in the collection of student record data, it can also play a crucial role in setting the tone and expectations for all student services offices that interface with students after enrollment.

DATA AND REPORTING

- Although the U.S. Department of Higher Education requires institutions to report gender on a binary, institutions should also collect gender identity, pronouns, and other markers that allow the student to be acknowledged fully.

INCLUSIVE STAFF AND FACULTY PRACTICES

- Developing a comprehensive roadmap for campuses to become more inclusive for transgender and LGBTQ+ students require directives for staff and faculty. Get buy-in from staff and faculty by including them in the development of their own training to ensure the importance of an inclusive campus is understood and practices flows seamlessly across campuses.

FURTHER ADVOCACY

- Organizations, such as AACRAO, should set a nationally consistent set of specifications on the topic of gender identity so vendors can deliver software that supports the functionality necessary thus eliminating the barriers created by limited technology. These same organizations should come together to advocate on data collection and file matching.
- Local and State organizations should come together to advocate on state-level non-discrimination legislations, reporting, and anti-bullying legislation and policies

INTRODUCTION

BACKGROUND

Defining and creating a more inclusive environment for LGBTQ+ on American college campuses has been a long and difficult struggle. A struggle that in many ways parallels and indeed intersects with the national struggle for LGBTQ+ inclusion, rights, and equity. As the attitudes of Americans have changed over the decades with respect to LGBTQ+ people, the environment for those students on college campuses has undoubtedly improved. However, the needs and voices of Transgender and Non-Binary students on both college campuses and nationally have not been acknowledged or honored in the same way. As national attitudes change and the number of college students who are coming out as Transgender and Non-Binary increases, college campuses are struggling to create inclusive environments for Transgender students.

On October 21, 2018, the New York Times reported that a memo they had obtained revealed that the U.S. Department of Health and Human Services:

“is spearheading an effort to establish a legal definition of sex under Title IX, the federal civil rights law that bans gender discrimination in education programs that receive government financial assistance.”

The memo obtained by the Times goes on to argue that it is necessary to develop: “a uniform biological definition of gender that is grounded in science and, objective, and administrable”. An approach to gender, or any student identity marker, that insists upon any part of a person’s identity being immutable runs contrary to both what is understood to be true from decades of student development theory research (Chickering & Reisser, 1993) and through the lived experiences of students on college campuses and the faculty and staff who serve them.

While the questions of where Transgender and Non-Binary people fit and should be acknowledged in our society are subject to the vicissitudes of socio-political arguments, the fact remains that practitioners in admissions and registrars offices have a duty to serve and advocate for students in a manner that is inclusive and welcoming. It has shown to be true again and again that student success on college campuses is inextricably linked to a sense of belonging (Hoffman, Richmond et al, 2003). As such, it is a settled fact that all offices who serve students and colleges and universities writ large have a duty to meet students where they are and to provide the resources necessary, within the scope of their missions, for students to feel included and welcomed.

REPORT STRUCTURE

The core purpose of this report produced by the American Association of Collegiate Registrars and Admissions Officers’ (AACRAO) Student Identity Workgroup seeks to create a roadmap to a more inclusive campus environment for transgender students. In setting down a roadmap, it is important to acknowledge that colleges and universities have widely varying needs with respect to the students they serve, the political environments of their home states, systems/technology, educational missions etc. The goal of this report is not to create a one size fits all standard, but rather to create a clear sense of what trans student inclusiveness looks like.

Student Identity

In creating this report, the Work Group has attempted to provide practitioners with rationale through “The Case for Inclusion” section as well as through the “Student Stories” section, composites of real experiences transgender students have had on college campuses; a practical next steps list organized as good, better, best, a format also used by Beemyn, Dominique et al, 2005; guidance for major student information system (SIS) and Client Relationship Management (CRM) vendors as to what functionalities are necessary to accommodate students’ needs from a databases and systems perspective; and legislative next steps for local, state, and the federal government.

LANGUAGE

For the purposes of this report the word Transgender or Trans will serve as the marker for a wide range of gender expressions. According to the National Center for Trans Equality (NCTE):

“Transgender is a broad term that can be used to describe people whose gender identity is different from the gender they were thought to be when they were born. “Trans” is often used as shorthand for transgender.”

Similarly, Non-Binary people can fall into a wide range of expressions. For the purposes of this report, Non-Binary will be the umbrella term used with respect to these experiences. According to NCTE resources on Non-Binary People:

“some people don’t neatly fit into the categories of “man” or “woman,” or “male” or “female.” For example, some people have a gender that blends elements of being a man or a woman, or a gender that is different than either male or female. Some people don’t identify with any gender. Some people’s gender changes over time.”

A full glossary of terms as well as links to several online resources that are kept up-to-date as terms are added or changed will be available in the glossary of this report. It is important to note that this report, aside from making specific recommendations on how to acknowledge identity using appropriate language in the scope of student services, will not get into a detailed discussion of language and terms for Transgender and Non-Binary people.

STUDENT STORIES

E

Their classes weren't that hard, but E was exhausted. They identified as non-binary and found they were struggling each day to find their place in a very gender binary campus. Some of E's professors were trying to use "they/them" pronouns, but most didn't bother to try any more. E's birth name was regularly used by everyone from their instructors to the student worker who welcomed them to the dining hall each day. After a particularly trying day, E returned to their dorm to find new door decorations up. There was their birth name right on their door!

MILLA

Milla felt like she had a cloud over her head. Since she'd come out as transgender to her family last summer, her parents would have nothing to do with her. They had stopped sending tuition payments and Milla was regularly getting notifications from the Bursar's Office. She had an apartment, but didn't have the money to pay next month's rent. She hadn't eaten a full meal in days. She was trying to get a job, but her state did not have laws prohibiting discrimination based on gender identity. She'd been turned away by two jobs already. She was scared. She had nowhere to turn.

SASHA

Sasha was a proud transwoman. She came out during her freshman year of college and found support through the LGBTQ+ Center on her campus. She went to the Registrar's Office to change her records in the student information system, but soon learned it wouldn't be as easy as she'd hoped. The Registrar's Office required legal documentation to update school records. Sasha tried to explain she didn't have the \$300 to do a legal name change right now, nor the money to see a therapist and doctor to verify her change in gender. She had done so much to live as her true self, now she felt she was forced back into the closet each time she received a notification from school, logged on to check her grades or had to provide her email address, which included her legal name.

FRED

Fred was attempting to apply to college. He'd completed the application for admission using his lived name and gender. That's when the trouble started. Fred continued getting notifications about missing documents, even though he'd sent his transcripts and standardized test scores. He'd called the admissions office to let them know they would be under a different name, but he was still having trouble. Problems continued as he tried to submit his FAFSA. Did he need to register for Selective Service? What name should he list? It all became too much. Fred decided to work for a while instead of going to college.

MARK

As Mark was entering college as a female to male transgender student, he was able to contract for a spot in a male dorm. Since there were no gender inclusive or LGBTQ+-focused options, he was just happy he didn't have to live in a female dorm. He quickly found there were some issues with his new housing arrangement. He became even more dysphoric about his body. Living with all guys, he felt his chest was even more noticeable than ever. He started wearing his binder 24 hours a

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day. He was having pain in his ribs, but he didn't want to not appear "flat". Showers were a whole different issue. His floor had community bathrooms and the shower curtains were just flimsy plastic. He was too scared to take a shower, thinking someone would see his body. Mark's health and hygiene, not to mention his relationships with his floormates, were eroding quickly.

ANDRE

Andre felt a little shaky as he approached the LGBTQ+ Campus Welcome Program. He'd known for sometime the way he felt in his heart didn't connect to the outward male appearance he expressed. He hadn't made many friends in the first few weeks of school, hadn't made it to most of his classes, and had been depressed and withdrawn for the last year. He only came to college because his mom dropped him off at his dorm, despite his complaints. It had taken a lot to get himself up, dressed and out of his room to this moment, but his resident assistant had really talked it up and encouraged him to give it a try. As Andre walked into the event, he felt a warmth surround him. He was welcomed by staff and fellow students; one of his professors was even there! His resident assistant waved him over to join a board game with a group from his floor. A staff member from the LGBTQ+ Center asked him his name and pronouns. "Andrea. She/her/hers."

THE CASE FOR INCLUSION

Our campuses are continually evolving. And yet, even as our student profiles may change, at our base colleges and universities typically reflect and reinforce various societal norms in genderism, practices and policies. (Marine & Nicolazzo, 2014). If we want to change to reflect the evolving culture of the world around us, as institutions we have to be intentional and understand why we are seeking to change.

According to a 2017 study sponsored by GLAAD, millennials may be the generation with the largest population of individuals who identify openly as non-cisgender. The study found that 20 percent of 18-34 year olds openly identify as LGBTQ+. This compares to 12 percent of the Gen Xers and only 7 percent of Boomers. (Harris Poll on Accelerating Acceptance). In addition, we need to consider that the college-going rate for Millennials is higher than for previous generations. According to the U.S. Department of Education (2018), 70% of high school graduates enroll in college compared to only 45% in 1960. This means that more students are engaging with our institutions and a larger percentage of those students are looking for places where they will feel welcome and comfortable so that they may more readily pursue their academic and personal goals. If we want to attract these students and help them be successful at our institutions, we need to be aware of what they are seeking, what they need from us and how we can best respond.

First impressions matter. So does living up to the expectations set in our admissions and recruitment materials. One of the first considerations is to examine the language and images we use to present our institutions during the recruitment process. Do our form questions meet the array of responses that our prospective students seek to provide when it comes to answering questions related to gender, names, and pronouns? How do we introduce ourselves? How do we capture and use names and pronouns? These matter to students because they set the tone for campus culture and provide clues to what the student will encounter if they matriculate to our institutions. It's also important to consider how complete and transparent our processes are. Some institutions have made adjustments and allow students to indicate the use of a chosen first or chosen name, but students may have to dig to determine how to submit it or where it will be used or not used. (Beemyn & Brauer, 2015; Campus Pride, 2018; Seelman, 2014a, 2014b). And, while a preference may be asked for initially it may not be successfully passed consistently to various systems across the campus, leaving the students subject to humiliating experiences by being singled out, misnamed, misidentified, misgendered and feeling very much othered.

These situations can have serious consequences for students. Transgender students, whether out or perceived to be trans, are more likely to experience various types of harassment. According to the U.S. Transgender Survey 24% of respondents who were in college or vocational schools reported being verbally, physically, or sexually harassed at that time. And, of those students, 16% of reported that they left college because of it (James et al., 2016).

If we want our students to persist and graduate, we have to look hard at our institutions policies, practices and culture and as well as how we prepare to engage with students. A study conducted by Ellen Bara Stolzenberg and Bryce Hughes, trans students come to higher education anticipating a hostile environment. Their perceived mental health, relative to their peers, over half of the respondents in Stolzenberg and Hughes' study indicated that they perceived their emotional health as either

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below average or in the lowest 10 percent.

Recommendations from the American Association of American Colleges & Universities based upon the Stolzenberg and Hughes' study include providing professional development designed to specifically enable faculty and staff to more competently and effectively support students, especially those identifying as transgender. College and university leaders should, thus, work to empower faculty and staff to resist the persistence of any hostile climate, and alongside transgender students work to co-construct a diverse learning environment that enables the full participation of all students (Stolzenberg and Hughes.)

It is also important for universities to remember that students who come to our campuses are in various stages of identity discernment. In the often cited seven vectors of student development theory established by Arthur Chickering, the fifth vector (which builds on the previous four) deals with the development of identity as a process. Our students come to us and engage on our campuses at various points in their own identity development. Ultimately, as humans we seek to form a sense of contentment with ourselves and how we are seen by others (Chickering). This provides a challenge for our institutions and us as higher education professionals as there is no "one size fits all" approach to responding to individual student needs. It is imperative that we work to continue to adjust and seek to continually improve our ability to serve our students' needs so we can support them as they move through their academic and personal development.

Good, Better, Best A Roadmap to Inclusion

Names

OVERVIEW

A student's name is a central part of their identity. Names often carry with them cultural, religious or family significance. Students may use their legal name, a lived or chosen first name, an initial, or a combination of names depending on the setting or their stage of transition. For many students, hearing their dead name, or formerly used name, can be upsetting or even trigger severe dysphoria. Identifying a student by the wrong name in a public setting, such as a classroom or service desk, can be embarrassing and possibly dangerous for a student who is not out as transgender.

It's important to note changing a name is not a simple process. The process for legally changing one's name is often costly, time-intensive, and can be intimidating, particularly if a courtroom visit is required. Additionally, policy and practice around legal name changes vary widely, even within some states. It should not be assumed that a transgender student will change their name.

Regardless what name a student uses, colleges and universities should anticipate various scenarios and provide clear guidelines and procedures for changing name. Students should be aware how each requested name type could be used, as they may use one name for employment and another in the classroom.

ISSUES TO CONSIDER

- The chosen first name policy should apply to all students.
- Each college or university must determine what name types will be utilized on degrees and credential bestowing documents, balancing student identity needs with the potential of fraud and misuse.
- Students may have a need to change their legal or chosen first names multiple times during and after enrollment.

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GOOD

- Educate the campus community about the presence and usage of chosen first name.
- Have an option for chosen first name.
- Have a policy guiding the use of chosen first vs. legal name.
- Have a policy website detailing the policies and procedures for the management and changing of chosen first and legal names.
- Clarify where chosen first and legal name will be used and disclose the limits of the institution's ability to control that usage.
- Allow students to choose a chosen first name as early in the process as possible.
- Pass the chosen first name from the admissions recruitment system to the student system by the time of application.
- Allow students to change their chosen first name at will with self-attestation as the primary source of documentation.
- Allow former students and alumni to change name records in a way that matches the institution's existing name change policies.
- Make chosen first name easily accessible in any system utilized by university employees who serve students.
- Push chosen first name to the class roster, the learning management system, and other front facing systems.
- Ensure HR systems are capable of ingesting and storing a student's chosen first name.

BETTER

- Collect chosen first name at the earliest point possible, usually the recruitment or admissions process, and ensure the chosen first name flows through to the student record, at first point of interface.
- Regulate who has access to legal name based upon a demonstrated educational need to know as defined by FERPA.
- Push chosen first name to most systems that contain student data.
- Allow students to put chosen first name on campus ID card.
- Allow students to change chosen first name via self-service.

BEST

- Allow students to individually determine and indicate in self-service where chosen first and legal name is used.
- Push chosen first name to all systems that contain student records with exception of degree/credential bestowing documents).
- Ensure HR system and student systems dynamically update each other when changes to chosen first and or legal name are made.
- Ensure chosen first name flows to all systems that use student information.
- Restrict legal name to only those offices that have a critical need to access legal name data. Make chosen first name universally available and viewable in all systems containing student data.
- Ensure student can control the name displayed in third party or proxy access (for purposes of paying bills, accessing records etc.).

Student Identity

PRONOUNS

OVERVIEW

The collection and use of pronouns, while still an emerging practice, is a valuable means for both making students feel included and welcomed on campus as well as for practical reasons in recruitment, admissions, and student records. While stating or asking for one's pronouns is an increasingly common practice on college campuses, systematic collection of pronouns on recruitment forms, applications for admission, and other key biographical forms is to the best of the work group's knowledge a less common practice.

While collecting pronouns from students as early as the prospective student stage can seem like a big leap, it's worth considering that colleges currently and almost as a matter of habit, collect gender from students in a variety of ways. As opposed to a student's gender identity/legal gender, pronouns offer a very practical roadmap for how to address a student in official university communications and a means for understanding better how a student identifies than a single gender marker.

The work group acknowledges that the list of pronouns is ever growing and changing as the landscape around gender identity changes and evolves. However, it is worth colleges considering adopting a reasonable list of available and/or most common pronouns from the National Center for Trans Equality (NCTE) or other authorities on this topic for use on admissions and student records forms.. References to available resources will be available in the appendix of this report.

ISSUES TO CONSIDER

- As with all recommendations in this report, adopting collection of pronouns will require training for faculty and staff on how to utilize pronouns in an inclusive manner.
- It is important to realize that a student's stated identity with a college may be ahead or behind their stated identity in other parts of life. Collection of pronouns should be accompanied by a transparent statement as to how and where pronouns collected by the college will be used.

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GOOD

- Collect pronouns from students.
- Establish a place in the student information system to put pronouns.
- Ensure student pronouns flow to essential student systems and are available to university employees who serve students e.g. class rosters, advising systems, and customer service systems.
- Develop a written policy on the collection and usage of pronouns.
- Collect one of four options from students: 1) She/Her/Hers, 2) They/Them/Theirs, 3) He/Him/His, and 4) These pronouns do not apply to me and/or prefer not to answer.
- Allow students to change pronouns at will.
- Educate the campus community about the presence and usage of pronouns.

BETTER

- Ensure student pronouns flow to most student systems and are readily available to university employees who serve students.
- Provide a free text field that allows students to clarify their pronouns, if a student selects the "does not apply to me" option.
- Ensure the free text pronoun, in addition to the validated list, populate to most systems that contain student data.
- Give students the ability to change pronouns via self-service.

BEST

- Use the input from additional free selection box to update the standard dropdown choices. This will help institutions stay on the leading edge of changes in pronoun language.
- Reinforce the importance of using pronouns in customer service or student service interactions instead of using gender or a student's appearance as a proxy.

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SEX AND GENDER

OVERVIEW

Along with name, date of birth, and other core biographical data points, gender is amongst the most collected data points on forms from the prospective student stage all the way through to graduation. Collection of student gender is almost reflexive. In some cases, collection of gender data can be critical: housing assignments, initial eligibility to attend single sex colleges, and federal and state reporting requirements. However, it is often the case that colleges are collecting legal sex or sex at birth on admissions forms as a proxy for a student's gender identity and/or pronouns.

It is helpful first to understand the following definitions of various gender markers:

Sex at birth - the sex assigned by a doctor at the time of a person's birth.

Legal sex - the sex that that a person is declared to be according to government records.

Gender Identity - the gender, or mix of genders, that a person perceives themselves being.

It is critical that campuses understand these definitions and seek to clarify what students are being asked to report and why with respect to sex and gender. Too often, students are asked questions about their sex and gender that are either for non-essential purposes or are the incorrect marker for the purpose the institution has in mind.

ISSUES TO CONSIDER

- Eliminating gender and sex from most places vs. granular needs for access to sex and gender information.

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GOOD

- Use separate sex and gender identity questions, when the questions are necessary.
- Ensure institution is transparent with students about where data points on sex and gender are used and reported at the time those data points are collected.
- Discern whether sex and/or gender needs to be collected on admissions prospect forms and other less formal documents.
- Ensure students can change self-reported sex and gender information at will using self-attestation as documentation.
- Ensure alumni and former students can change self-reported sex and gender information at will using self-attestation as documentation.
- Collect gender identity as a separate field from sex using a validated field that includes choices for: male, female, transgender female, transgender male, non-binary.

BETTER

- Audit institutional uses of gender/sex to determine whether those uses are necessary and useful.
- Put the question about gender identity before the question about legal sex.
- Regulate who has access to sex based upon a demonstrated educational need to know as defined by FERPA.
- Use gender to make a distinction in cases where a service or opportunity is only open to one sex/gender.
- Collect gender identity as a separate field from sex using a validated field that includes choices for: male, female, transgender female, transgender male, non-binary, Agender, Genderqueer.

BEST

- Don't ask student to self-report sex, but instead populate that field where necessary from the financial aid ISIR record for NSLDS reporting purposes.
- Collect sex on binary using a question phrased along the lines of: sex for reporting purposes.
- Collect gender identity as a separate field from sex using a validated field that includes choices for: male, female, transgender female, transgender male, non-binary, Agender, Genderqueer, does not apply. A conditional free entry field will be provided for students who select "does not apply" giving them the option to free enter their gender identity. The institution will use the result of this list to update the pre-defined list over time.
- Begin using gender as opposed to sex for external and internal reporting and trend analysis purposes.

FINANCIAL AID & SCHOLARSHIPS

OVERVIEW

Financial aid professionals need to be sensitive to the experiences of these students as they complete required documents for financial aid eligibility, and eliminate gender identification-related barriers in the design and data collection from their own institutional forms or other mechanisms for determining aid eligibility. Strategic financial aid deployment is widely known as an effective tool for institutions to achieve enrollment management objectives, and elimination of these barriers will serve both applicants and institutions well in an effort to expand access.

ISSUES TO CONSIDER

The Free Application for Federal Student Aid (FAFSA) creates certain barriers for transgender or non-binary students, which can have an impact on their ability to gain access to student aid. The complications arise from the connection between the FAFSA and registration for Selective Service (Prescott, 2017).

Selective service law, as written, requires registration of all male US citizens between 18–25 years of age, as well as any non-citizens between 18–25 years of age living in the United States. The FAFSA, in addition to its function in determining aid eligibility, can be used as a registration mechanism for persons with a legal requirement to register with Selective Service. A student who is legally required to register with Selective Service but has not done so will not be eligible for some forms of federal financial aid (“Why register?”, 2018). This includes students whose gender assigned at birth is male, and who change their gender but do not go through a legal gender change process.

The 2018-2019 FAFSA asks for an applicant’s gender assigned at birth (drawing no distinction between sex and gender). A student whose gender identity does not match that assigned at birth faces a dilemma in response, and an additional barrier to receiving the assistance they need through a forced identification with a gender they no longer claim (Prescott, 2017).

An additional obstacle is created by data cross-referencing between FAFSA, Selective Service, and the Social Security Administration (SSA), which is the data source for Selective Service. Students who have completed a legal gender change before the age of 18 will have records in the SSA documenting the gender assigned at birth, which may either require or eliminate the need for Selective Service registration (Prescott, 2017). On the other hand, transgender students who have not completed the costly procedure of a legal gender change, due to either lack of desire or opportunity, and who need access to financial aid for college, encounter an additional barrier to receiving the assistance they need through a forced identification with their gender assigned at birth.

Student Identity

GOOD

- Have an identified staff member who is versed in financial aid issues for students who have changed gender.
- Provide information on the financial aid website and on websites geared towards LGBTQ+ students geared towards students who have changed gender.
- Make sex or gender based scholarships available to students based upon the gender with which they identify.
- Review financial aid letters to ensure they are using inclusive language and avoiding assumptions in use of pronouns.
- Follow campus policies on the use of chosen first vs. legal name and pronouns in financial aid communications from schools and colleges.

BETTER

- Create and offer scholarships specifically for transgender students (and/or LGBTQ+ scholarships for students active in the LGBTQ+ community/experiencing challenges due to LGBTQ+ status).
- Conduct an analysis to determine where strategic financial aid can impact the enrollment and retention of transgender and LGBTQ+ students.

BEST

- Offer sessions specific to LGBTQ+ students on how to pay for college.
- Develop recruitment focused scholarships and a strategic financial aid strategy designed to attract LGBTQ+ students.
- Ensure all policies that specifically impact transgender students are transparent and arranged in a way to make the financial aid process seamless.

Student Identity

RECRUITMENT

OVERVIEW

As with all recruitment, effective recruitment is definitionally inclusive for a broad variety of students. Institutions benefit from communicating clearly with students about what resources exist to meet their needs. This is especially true for Trans students. An institution that has resources in place will benefit from clearly communicating those resources from a recruitment perspective.

GOOD

- Perform an institutional scan to ensure that the institution has the appropriate resources and infrastructure in place to support transgender students.
- Be mindful of the representation of transgender and other LGBTQ+ students in presentations and other public facing events; this includes avoiding unnecessary gendered language, gender inclusive housing, resources on campus etc.
- Ensure admissions materials should contain information for, and representation of transgender and other LGBTQ+ students.
- Examine whether the institution needs to collect gender in the recruitment process.
- Ensure students are able to indicate a gender identity that matches their lived experiences when gender is needed and collected.
- Provide the option for students to indicate a chosen first name on data collection forms.
- Utilize chosen first name in recruitment communications when provided.
- Review admissions materials and communications to remove pronouns wherever possible until pronouns can be collected from a student after matriculation.
- Avoid collecting a name field called legal name on recruitment data collection forms.
- Train all staff to ensure they are familiar with terminology, and are prepared to serve a full range of LGBTQ+ students.
- Ensure inclusive housing is available and proactively communicated to prospective and enrolling students.
- Include clear and transparent definitions of the university's policies around gender.
- Make Safe Space or an equivalent training to any staff who are willing to support and advocate for LGBTQ+ students. Safe Space signs should be clearly posted in workspaces of all staff who have completed Safe Space training.

Student Identity

BETTER

- Take action to fill gaps in resources and infrastructure identified in the institutional scan.
- Seek out opportunities for the admissions office to be engaged in campus work groups, task forces, and committees that are specifically charged with helping the institution better serve transgender and LGBTQ+ students.
- Allow students to indicate what types of communications they would like to have chosen first name used on.
- Vet recruitment materials with focus groups made up of current and prospective students.
- Partner admissions with other campus groups to advocate for a fulsome range of gender inclusive housing options to match the needs of prospective and enrolling students.
- Create pull out marketing pieces specifically designed and written to recruit transgender and LGBTQ+ students.
- Create a dedicated website designed for prospective transgender and LGBTQ+ students.
- Create awareness of the needs of transgender students abroad with respect to political climates in other countries, surrounding LGBTQ+ people.

BEST

- Highlight academic programs in LGBTQ+ and Gender Studies.
- Offer dedicated sessions at open house programs, admitted student days, and other admissions events that are focused on the services available to transgender and LGBTQ+ students.

ADMISSIONS

OVERVIEW

As the usual originating point for the official student record, the admissions office(s) at any institution must be committed to ensuring that applicants have as much control as possible in determining their own chosen first names and pronouns. For institutions with a decentralized admission model, where individual programs or departments handle admission related processes, in part or in whole, institutional-wide policies must be developed and enforced to ensure that students have the same, positive experience regardless of their level or field of study. Not only is this commitment important for reasons of accuracy and integrity in the collection of student record data, it can also play a crucial role in setting the tone and expectations for all student services offices that interface with students after enrollment.

It is also important to remember that, until a student actually enrolls and classes begin, the recruitment process is ongoing. A negative or frustrating experience during the admission process, relative to chosen first name/pronoun, is likely to leave prospective students with the impression that the institution is not sensitive to their needs. For all of the aforementioned reasons, it is incumbent upon the admissions office to take the lead in policy and practice decisions that will determine how chosen first name/pronoun data is collected and shared.

Student Identity

GOOD

- Ensure that the admissions processing/review team are well trained on issues specific to transgender and LGBTQ+ students.
- Utilize chosen first name in accordance with campus policies in admissions communications (including decision letters).
- Inform students when legal vs. chosen first name will be used in official admissions communications.
- Design the admissions review process in a way that ensures bias is minimized in decision making.
- Ensure admissions reviewers in the admissions office(s), including adjunct readers, have received implicit bias training.
- Hide gender/sex from reviewers in cases where gender/sex is not necessary for decision making.
- Use gender identity as the gender marker as opposed to legal sex/sex at birth/sex where gender/sex is necessary for decision making due to university strategic goals.
- Provide students the opportunity to change markers at will once sex and gender have been collected.

BETTER

- Give students the opportunity to indicate whether they would like their chosen first name to be used on official admissions communications.
- Train staff tasked with admissions duties in colleges, schools, or departments implicitly on the issues specific to transgender and LGBTQ+ people.
- Provide students the opportunity to change markers at will via self-service once sex and gender have been collected.

BEST

- Ensure students are able to specifically indicate on what types of communications they would like legal vs. chosen first name used.
- Train and retrain faculty tasked with admissions duties in colleges, schools, or departments implicitly on the issues specific to transgender and LGBTQ+ people.
- Include gender identity as a part of the new student profile.
- Design the admissions review process in schools, programs, and departments at the graduate and undergraduate level to ensure bias is minimized in decision making.
- Include gender identities beyond the male female binary where the campus has specific gender goals

Student Identity

DATA AND REPORTING

OVERVIEW

There are two factors that drive most of the outdated and outmoded ways of collecting, storing, and reporting sex and gender data: federal and state reporting requirements and inflexible student information systems and data warehouses. In many ways, while the road to institutional inclusion is paved through protest, advocacy, and the changing of hearts and minds - it is the management and flow of data that will ultimately allow for increased flexibility around acknowledging students as they are.

Later in this report, there are specific calls for legislative action regarding the collection of data at the state and federal level. While the fact that the U.S. Department of Education requiring that gender be reported on a binary creates a challenge for institutions, it is also possible for institutions to make progress on this front by collecting sex on a binary but also collecting gender identity, pronouns, and other markers that allow the student to be acknowledged fully.

GOOD

- Ensure that security access to both systems and the data warehouse match campus policies around access to chosen first/legal name, pronouns, and sex/gender.
- Center policies regarding access to chosen first/legal name, pronouns, and sex/gender on an educational need to know.
- Provide training to the campus community on the appropriate use with respect to campus policies on the use (data access, reporting, and communications) of chosen first/legal name, pronouns, and sex/gender.
- Ensure that the campus identity management and email system complies with campus policies about chosen first/legal name, pronouns, and sex/gender.
- Establish a transparent policy regarding how data that is reported to state and federal agencies will be reconciled when a data mismatch occurs. E.g. gender variants that do not fit the male/female binary.
- Update FERPA policy to reflect whether directory information means legal name or chosen first name.

BETTER

- Use gender identity for reporting purposes as opposed to sex.
- Report trend data on recruitment and enrollment on gender identity
- Restrict access to sex/legal sex data to people with an educational need to know.

Student Identity

BEST

- Use gender identity data and trends to inform decision and direct campus resources to areas of greatest need.
- Ensure the FERPA policy allows students to choose what name should be released as part of directory information.
- Ensure consistent data definitions and field labels are used across campus systems.
- Reduce the amount of duplication of data collection by pulling data regarding name and gender directly from the SIS/system of record.

INCLUSIVE STAFF AND FACULTY PRACTICES

OVERVIEW

Developing a comprehensive roadmap for campuses to become more inclusive for transgender and LGBTQ+ students require directives for staff and faculty. Providing staff and faculty with training will be key in making sure the importance of being an inclusive campus is understood by having AACRAO's suggested practices flowing seamlessly across campuses. Visibility through various avenues focused on inclusivity of transgender and LGBTQ+ students is also important for staff and faculty to be included in the development of and to participate in throughout the academic year. The following section provides some issues to consider as well as some key good, better, and best practices when developing inclusive staff and faculty practices

ISSUES TO CONSIDER

- Having the necessary resources on campus to develop and conduct the training needed for faculty and staff.
- If this is a massive change of direction for a campus or if there is not total buy in from staff and faculty, it may take longer to adjust to the new culture of inclusivity.

GOOD

- Ensure basic safe zone training for all faculty and staff.
- Ensure pronouns are available on name tags for university employees who serve students.
- Create a listing of professional development opportunities and provide support for attending, conferences, trainings etc. that focus on education about the needs of transgender and LGBTQ+ people.
- Reinforce a culture of sharing pronouns as part of introductions at meetings, events, campus information sessions etc.

Student Identity

BETTER

- Provide training to faculty and staff that tailored to the needs of the students enrolled on campus.
- Emphasize the value of staff and faculty attending LGBTQ+ community events on campus to learn more about and support students.

BEST

- Create a hiring initiative for faculty and staff that emphasizes filling the pipeline of prospective employees with highly qualified transgender and LGBTQ+ people.

CALLS FOR FURTHER ADVOCACY

Much of this report has been focused on best practices at institutions. A main focus of AACRAO on a variety of topics is to create an environment where institutions and professionals are able to share best practices in place at various institutions. However, in some cases the sharing of best practices isn't enough. Institutions, professionals, and AACRAO need to advocate for policies and infrastructure that supports the recommendations made in this report.

STUDENT INFORMATION SYSTEM VENDORS

One of the challenges and vulnerabilities thus far for institutions who have created an inclusive environment around the topic of gender identity has been the limitations of the technology that supports our industry, especially student information systems. Schools who have been pioneers on this topic have often needed to create shadow systems or processes or modify delivered functionality in order to serve their students. One goal of this Workgroup and of AACRAO leadership has been to create a consistent set of specifications on the topic of gender identity so vendors can deliver software that supports the functionality necessary. From the vendor standpoint, this also aligns expectations so they are receiving a consistent request from the industry rather than varying requests from different schools.

The Workgroup encourages AACRAO as an organization to partner with the vendors to request the following recommendations. In addition, many universities and individual AACRAO members serve on advisory panels, user groups, and boards of directors of the software providers. We encourage those members to use their role to advocate for the following changes as well.

Student Identity

The Workgroup recommends that vendors (SIS as well as other software providers) update their products to deliver the following functionality:

NAMES (STUDENTS, FACULTY, AND STAFF)

- Allow students, faculty, and staff to designate a chosen first name.
- Provide ability to update chosen first name in self-service.
- Provide institution the opportunity throughout the system (at a granular level) to determine where the chosen first name is used and where the legal name is used.
- Provide students the opportunity to designate in self-service where chosen first and legal name is used for specific situations (example: campus use versus external use). Provide institutions the opportunity to expose this service to students or not based on institutional preference.
- If a system provides third party proxy service, students should have the opportunity to designate which name is displayed in the proxy service.
- If a software provider is providing services for a secondary system (bolt-on or downstream system), consume the chosen first name from the SIS instead of the legal name unless required by law.
- If a software provider is providing services for human resources, finances, and student services, all system should allow for similar chosen first name functionality and should dynamically update each other when changes to chosen first and or legal name are made.
- Systems that are housing both chosen first and legal name should have row level security to allow an institution to restricted the visibility of legal name only to those individuals who have a critical access need.

SEX AND GENDER

- Provide the ability for institutions to collect both “Sex” and “Gender Identity” as separate questions.
- For the Sex question, label the public facing display of the field/question to reflect “Sex for reporting purposes”
- For the Sex question, deliver the options of male and female.
- For the Sex question, provide institutions the flexibility to add additional options (example: some states have a 3rd designation of “X” on birth certificates or other state documents).
- For the Gender Identity question, label the field as “Gender Identity”.
- For the Gender Identity question, deliver the options male, female, transgender female, transgender male, non-binary, agender, genderqueer, does not apply.
- For the Gender Identity question, when providing the “does not apply” option, provide a free form text option to allow a student to enter their own identity.
- For the Gender Identity question, provide institutions the ability to add additional identities based on their institutional practices.
- In both screen placement and question flow on forms, Gender Identity should always be presented as a question or data point before Sex.
- Provide institutions the ability to choose whether the “Sex” field or “Gender” field is used and visible through security throughout the system and on reports.
- Provide students the ability to update their Gender Identity through self-service.
- Provide institutions the ability to allow students to update their Sex through self-service or via an approval based business process. Institutional choice based on their policies.

Student Identity

PRONOUNS

- Provide institutions the ability to collect pronouns with the field label “Pronoun”.
- Deliver the options of She/Her/Hers, They/Them/Theirs, He/Him/His, These pronouns do not apply to me and/or prefer not to answer.
- Deliver an open text box for students to provide additional information if they choose “these pronouns do not apply to me” and/or “prefer not to answer”.
- Allow students to update pronoun through self-service.
- Deliver functionality to present pronoun on class rosters, grade rosters, advising reports, degree audit reports, faculty, staff, and advisor facing pages about students.

U.S. DEPARTMENT OF EDUCATION

The Workgroup encourages AACRAO as an organization to partner with other organizations to advocate for the following recommendations. In addition, many universities and individual AACRAO members advocate directly with the department. We encourage those members to use their role to advocate for the following changes as well.

DATA COLLECTION

- Short Term: We advocate for the collection of both Sex and Gender Identity as part of IPEDS reporting.
- Long Term: We advocate for the collection of only gender identity as part of IPEDS reporting.
- We advocate for the reporting out of gender identity when used for success reporting and longitudinal reporting.
- Background: When monitoring student success and access for students in higher education, we feel that gender identity is a better representation of the data that is being measured and reported.

FILE MATCHING

- We recommend that sex or gender no longer be used as part of a student’s file for file matching with existing data sets. This is especially relevant in matching data related to federal student aid.

FEDERAL GOVERNMENT

The Workgroup encourages AACRAO as an organization to partner with other organizations to advocate for the following recommendations. In addition, many universities and individual AACRAO members advocate directly with the department. We encourage those members to use their role to advocate for the following changes as well:

- We advocate for the collection of only gender identity as part of reporting and data collection efforts by agencies who interact with student success. This can include Health and Human Services, Labor, Census and other agencies who leverage sex based data for comparison and trending purposes.
- We advocate for the ability for transgender military personnel to be able to serve openly and be supported within the various military branches and Veteran’s Administration. Military and veteran benefits are a pathway to higher education for a significant number of students and the exclusion of transgender individuals from the military closes this door for countless individuals.
- We advocate against the development of a legal definition of sex at the federal level that is based on identification at birth or genetic analysis.

LOCAL AND STATE GOVERNMENT

The Workgroup encourages state and regional AACRAO organization to partner with other organizations to advocate for the following recommendations on the local level. In addition, many universities and individual AACRAO members advocate directly with the department. We encourage those members to use their role to advocate for the following changes as well.

STATE LEVEL NON-DISCRIMINATION LEGISLATION

- We advocate for the inclusion of sexual orientation, and gender identity & expression in state and local non-discrimination ordinances.

REPORTING

- Short Term: We advocate for the collection of both Sex and Gender Identity as part of state wide higher education data reporting systems.
- Long Term: We advocate for the collection of only gender identity as part of state wide higher education data reporting systems.
- We advocate for the reporting out of gender identity when used for success reporting and longitudinal reporting.
- Background: When monitoring student success and access for students in higher education, we feel that gender identity is a better representation of the data that is being measured and reported.

ANTI-BULLYING LEGISLATION AND POLICIES

- We advocate for the inclusion of enumerated anti-bullying policies inclusive of sexual orientation, and gender identity & expression within states and local school districts. The success of college students can start with a strong foundation within the K-12 environment and anti-bullying policies help support that foundation.

CONCLUSION

It is worth noting that issues of the spectrum of identities and opportunities to welcome those identities on college campuses are much broader than the scope of this report. For example, this report does not examine the collection of sexual orientation and its intersectionalities with gender identity. The Student Identity Workgroup encourages AACRAO to consider commissioning workgroups to consider other aspects of student identity in the admissions and registrar areas.

Much work has been done in higher education around making college and university campuses more inclusive and welcome spaces. However, much work remains to be done. The AACRAO Student Identity Workgroup believes strongly that now more than ever, campuses have an opportunity to address the needs of Trans and Gender Non-Binary students. While the work of making admissions and registrar processes is largely invisible and behind the scenes, the changes made in those offices can profoundly change a student's experience of the institution for the better.

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