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February 28, 2014

White House Task Force to
Protect Students from Sexual Assault
United States Department of Justice
Office on Violence Against Women
145 N Street NE
Suite 10W.121
Washington, DC 20530

Dear Members of the Task Force:

On behalf of RAINN, I write to offer comments and recommendations to the White House Task Force to Protect Students from Sexual Assault.

RAINN is the nation's largest anti-sexual violence organization. RAINN operates the National Sexual Assault Hotline (800.656.HOPE and online.rainn.org), which has helped more than 1.9 million people since its creation in 1994 (the telephone hotline is run in partnership with more than 1,000 local sexual assault service providers). RAINN also operates the DoD Safe Helpline on behalf of the Department of Defense. Additionally, RAINN carries out programs to prevent sexual assault, help victims, and ensure that rapists are brought to justice. We are encouraged by the renewed national focus on issues of campus sexual assault and are pleased to offer our perspective, which is based on our experience working on prevention on hundreds of college campuses and helping thousands of college students recover from their attack.

One out of every six women and one out of every 33 men are victims of sexual assaultⁱ – 20 million Americans in all. Those of college age are more likely to be victimized than any other age group. According to the Department of Justice, on a campus of 10,000 students, as many as 350 women may be victims of sexual assault each year. And alarmingly, the Department of Justice (DOJ) estimates that just 12% of college victims report their assault to law enforcement officials.ⁱⁱ This is far below the rate of the general population, where about 40% of all sexual attacks are reported to police, according to DOJ.

RAINN's Work on Issues of Campus Sexual Assault

For two decades, RAINN has led efforts to prevent and better respond to on-campus crimes of sexual assault. On the public policy front, we supported passage of the Campus

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SaVE Act and look forward to the implementation of its requirement that campuses, by October 1, 2014, establish a comprehensive policy and plan for tackling these issues in their communities.

In addition to advancing policy reforms, RAINN works hand-in-hand with college students and officials. RAINN coordinates an annual day of action ("RAINN Day") to educate students about preventing and recovering from sexual violence on college campuses. For the most recent RAINN Day, in September 2013, RAINN partnered with MTV and nearly 300 college campuses across the country. In the last 10 years, the program has educated millions of college students and administrators across the country.

Perpetrators of Campus Sexual Assault: What We Know

In the last few years, there has been an unfortunate trend towards blaming "rape culture" for the extensive problem of sexual violence on campuses. While it is helpful to point out the systemic barriers to addressing the problem, it is important to not lose sight of a simple fact: Rape is caused not by cultural factors but by the conscious decisions, of a small percentage of the community, to commit a violent crime.

While that may seem an obvious point, it has tended to get lost in recent debates. This has led to an inclination to focus on particular segments of the student population (e.g., athletes), particular aspects of campus culture (e.g., the Greek system), or traits that are common in many millions of law-abiding Americans (e.g., "masculinity"), rather than on the subpopulation at fault: those who choose to commit rape. This trend has the paradoxical effect of making it harder to stop sexual violence, since it removes the focus from the individual at fault, and seemingly mitigates personal responsibility for his or her own actions.

By the time they reach college, most students have been exposed to 18 years of prevention messages, in one form or another. Thanks to repeated messages from parents, religious leaders, teachers, coaches, the media and, yes, the culture at large, the overwhelming majority of these young adults have learned right from wrong, and enter college knowing that rape falls squarely in the latter category.

Research supports the view that to focus solely on certain social groups or "types" of students in the effort to end campus sexual violence is a mistake. Dr. David Lisak estimates that three percent of college men are responsible for more than 90% of rapes.ⁱⁱⁱ Other studies suggest that between 3-7% of college men have committed an act of sexual violence or would consider doing so. It is this relatively small percentage of the population, which has proven itself immune to years of prevention messages, that we must address in other ways. (Unfortunately, we are not aware of reliable research on female college perpetrators.)

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Consider, as well, the findings of another study^{iv} by Dr. Lisak and colleagues, which surveyed 1,882 male college students and determined that 120 of them were rapists. Of those determined to be rapists, the majority — 63% — were repeat offenders who admitted to committing multiple sexual assaults.^v Overall, they found that each offender committed an average of 5.8 sexual assaults.^{vi} Again, this research supports the fact that more than 90% of college-age males do not, and are unlikely to ever, rape. In fact, we have found that they're ready and eager to be engaged on these issues. It's the other guys (and, sometimes, women) who are the problem.

Preventing Sexual Assault on College Campuses

The federal government has, with this task force, an unprecedented platform to deliver a national message of zero tolerance for sexual violence on college campuses and to push for the spread of prevention programs. But we urge the task force not to hurriedly endorse a single message or marketing campaign or rush to create a new one. The fact is, there is a real dearth of reliable data on what works. Because of this, the role of the federal government should be to encourage innovation and sponsor rigorous evaluation, rather than force the adoption of specific programs.

There is no shortage of campaigns designed to deliver anti-sexual violence awareness and prevention to college-aged students and other members of the community. While many of these programs seem promising, research to date is insufficient to allow us to know how effective they are or to identify best-in-class programs. There is also insufficient research to know if one-size messages work, or if (and how) they should be tailored for audiences such as male or LGBT survivors or those with disabilities.

The federal government should seize this opportunity to conduct a meaningful evaluation of existing campaigns and a research-informed assessment of what messages have been most effective toward the ultimate goal of stopping rape before it occurs and keeping these serial criminals off our streets and college campuses. These evaluations should focus on the true end goal, reducing rape, not intermediate goals such as changing attitudes (despite the fact that these intermediate goals are vastly easier to measure).

Perhaps counter-intuitively, we recommend not focusing prevention messaging towards potential perpetrators (with one exception, described below). Importantly, research has shown that prevention efforts that focus solely on men and "redefining masculinity," as some programs have termed it, are unlikely to be effective. As Dr. Lisak has noted,^{vii} we can benefit from decades' of sex offender treatment work, which supports that it is all but impossible to reprogram a serial offender with a simple prevention message.

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There is one other area in which the federal government can play a productive role: using its research expertise to conduct frequent anonymous surveys on a variety of campuses, in order to measure the rate of sexual violence and the impact of individual campus prevention programs. As a bipartisan group of 39 legislators said in a letter^{viii} to the Department of Education, such surveys can help us obtain a more accurate understanding of the extent of sexual violence on campuses. Leadership from the federal government, to ensure that the surveys yield uniform and constructive data, would be very valuable.

RAINN recommends a three-tiered approach when it comes to preventing sexual violence on college campuses. A prevention campaign should include the following elements:

1. Bystander intervention education: empowering community members to act in response to acts of sexual violence.
2. Risk-reduction messaging: empowering members of the community to take steps to increase their personal safety.
3. General education to promote understanding of the law, particularly as it relates to the ability to consent.

You may note that we have not used the term “primary prevention,” which is widely used in the field. That is because we have a different definition of primary prevention than many. We believe that the most effective — the primary — way to prevent sexual violence is to use the criminal justice system to take more rapists off the streets. Stopping a rapist early in his or her career can prevent countless future rapes. Because increasing reporting and vigorous prosecution are better addressed in the context of response to sexual assault, we discuss this further in the crime section below. This approach should, of course, continue to be complemented by education and outreach campaigns targeted towards younger, more malleable populations.

Bystander Intervention

Bystander intervention messaging is an unproven, but promising, approach, and we recommend expanding its use in the context of combatting sexual violence on campuses. Changing social norm so that students feel a responsibility to watch out for friends, and intervene before a friend becomes a victim or perpetrator, should be encouraged and supported by the federal government. The task force should also encourage the use of technology to disseminate bystander education, which needs to be repeated and specific to be useful.



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Risk Reduction

As anyone who has worked on rape prevention knows, risk-reduction messaging is a sensitive topic. Even the most well-intentioned risk-reduction message can be misunderstood to suggest that, by not following the tips, a victim is somehow to blame for his or her own attack. Recent survivors of sexual violence are particularly sensitive to these messages, and we owe it to them to use them cautiously.

Still, they are an important part of a rape prevention program. To be very clear, RAINN in no way condones or advocates victim blaming. Sexual assault is a violent crime and those who commit these crimes are solely responsible for their actions. That said, we believe that it is important to educate members of a campus community on actions they can take to increase their personal safety. In fact, we believe it's irresponsible not to do so.

Over decades, it has been shown that risk-reduction messaging is an important component of crime prevention overall. This approach has significantly contributed to reducing the number of violent and property crimes. It has a similar value in sexual violence prevention.

Many institutions incorporate risk-reduction tips into their awareness messaging and we encourage the federal government to support this type of messaging.^{ix} Many respondents — survivors, faculty, and others — to our survey on the issue of campus sexual assault (see Appendix) endorsed this view as well. This recommendation is intended to impart tools of empowerment, not victim blaming.

Promoting Understanding of the Law

Notwithstanding our point above about the futility of directing prevention messages to potential college perpetrators, there is one area in which such messages can have a salutary effect. In our public education work, we consistently encounter confusion about the definition of consent, particularly in cases in which one or both parties have consumed alcohol or drugs. Students receive a tremendous amount of conflicting (and often erroneous) information about where "the consent line" is.

Some campaigns and websites claim that the ingestion of even a single drink renders someone unable to legally consent, while conversely others explain that anyone short of unconscious can consent (in fact, the standard varies by state; most common is an "incapacitation" standard, which itself is not always well defined in law). Still others giving advice to students use imprecise, and therefore unhelpful, words such as "buzzed" to describe the line.

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It's no wonder that many students are confused — and would benefit from clearer education. (For a similar reason, education should avoid terms that have no real legal meaning, such as "date rape.") This is one area in which technology can play a big role. Videos, interactive apps and websites should be utilized to explain, and demonstrate, the educational information much needed by students.

Responding to Sexual Assault on College Campuses

Despite the best prevention efforts, we know that these crimes will continue to occur on America's college campuses. Below, we offer recommendations for improvements to the response to these crimes, in furtherance of the overall goal of preventing future crimes and taking serial criminals off the streets.

Establish and Disseminate Clear, Concrete, Campus-Specific Policies and Procedures

Students and other members of the campus community need to know — *before* an event occurs — what to expect in the wake of a crime of sexual assault. To whom should these crimes be reported? What will occur in the wake of such a report? What medical and mental health supports are available (on campus and off)? What role will law enforcement have? Which members of the campus community are mandated reporters? What are the victim's rights in the process?

A handful of federal laws and guidance documents have created a murky landscape of protocols, procedures and punishments for these crimes. Discussing this with college administrators working to navigate this system, it is exceedingly clear that even the most highly informed and best intentioned are confused. Similarly, students, particularly survivors, find the entire process confusing and difficult to navigate in the wake of their trauma. Both have expressed confusion about community notification and Clery Act compliance; about who needs to report what and when; about who will investigate and what that process looks like; about how victims' requests for confidentiality can and should be honored. They are also confused about what punishments are (or should be) in place for offenders and what accommodations can be made available for those who report being attacked. They are confused about the value of the criminal justice response, the available reporting options, and likely outcomes in the event there are charges filed.

All this confusion discourages victims from coming forward to take the brave step of reporting this crime. If we expect victims to come forward and work with us to hold perpetrators accountable, then we need to demonstrate that their claims will be taken seriously, that these incidents will be treated as the crimes they are and their perpetrators

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as the serial criminals that, by and large, they are, and that clear systems and procedures will be in place to support them through the process.

Federal law requires nearly every college campus to, by this October 1, formalize a comprehensive sexual assault policy and establish training curricula for all members of the campus community. The law requires these policies to include information about reporting procedures, what to do and expect after a report is made, victims' rights, and many of the other topics we've noted are the source of ongoing confusion. We encourage the federal government to ensure that the promise of this law is fulfilled.

While we remain hopeful that school administrators and officials will dedicate significant thought to this process, RAINN is concerned by reports that some schools have taken a haphazard approach in this area. For example, while preparing to file a Clery complaint against her alma mater, the University of Ohio, Akron, a 2011 graduate discovered that the school's sexual assault policy appeared to be little more than a plagiarized conglomeration of other schools' policies. Some of the provisions, disturbingly, cited policies or practices that were inapplicable to her school and campus.^x

There are, no doubt, other examples like this. We therefore encourage the federal government to strictly enforce the requirements of the Campus SaVE Act and establish a mechanism for reviewing schools' policies and publicly sharing best practices so that other campuses can benefit from what's working well for their counterparts.

Enhancing Victims' Access to Support and Care Services

Critical to this effort are steps to ensure that students and other members of the campus community who experience sexual violence are met with comprehensive services.

Expanded Options for Care and Information

We must ensure there are multiple channels through which victims can come forward to get information and recovery help. The likelihood of a victim reporting the crime (and, thereby, potentially setting off a chain reaction of support services and potential prosecution) stands to increase in direct proportion to their awareness of and the availability of opportunities for help.

The federal government should require campuses to share, with all members of the campus population, information about on-campus resources, those such as rape crisis centers in the surrounding community, and national resources such as the National Sexual Assault Hotline (800-656-HOPE) and National Sexual Assault Online Hotline (online.rainn.org).

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The federal government should also, in keeping with recommendations published in the Justice Department's recent *Vision 21 Report*,^{xi} support innovative technology designed to reach college-aged students (38% of whom, in a recent survey, said they couldn't go more than 10 minutes without checking their smartphones or other electronic devices).^{xii} This presents a key opportunity: the federal government must encourage and support programs that utilize technology and social media to deliver education, prevention, and support around campus sexual violence.

Access to Medical Care and Sexual Assault Specialists

Access to comprehensive medical care and services in the immediate aftermath of sexual assault is vitally important. Each victim of an on-campus sexual assault should be educated on where care can be accessed (at any time of day) and should be encouraged to undergo a sexual assault forensic examination (and educated on why that can be important to holding their rapist accountable). If a sexual assault nurse examiner is not available on campus, victims should be offered free transportation to a hospital or facility that does offer these services (whether in person or through telemedicine), if available.

Enhanced Victim Support Systems

Victims of campus sexual assault need support systems when they come forward to report the crime. Victims can benefit from trained volunteers or staff who can help them navigate the minefield that a report of sexual assault can expose. We would encourage campuses to appoint a victim services coordinator (and support staff) to work directly with victims, help them understand their options and rights, accompany them to medical and legal proceedings, and help them cope with the aftermath of their assault (while ensuring that such staff have similar training, and enjoy similar confidentiality privilege protections, as other sexual assault service providers). This point person could help ensure that the student knows about any accommodations the university may make for them (for instance, options regarding housing transfers or class schedule adjustments). In the absence of a specific on-staff point person (or persons), schools should establish a system for training volunteers, R.A.'s, existing faculty members, or others to serve in this capacity.

Treating this as a Crime: Encouraging Reporting and Enhancing Partnerships and Coordination with Law Enforcement

Rape is all too often a crime without consequences. In America, out of every 100 rapes, only 40 are reported to police, and only three rapists will ever spend a day behind bars. On college campuses, the situation is even worse: according to the Justice Department, one in



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every five women will be sexually assaulted while in college, yet just 12% report the assault to law enforcement.

This disturbingly low reporting rate amounts to a massive missed opportunity in the fight against campus sexual assault. When these crimes aren't reported, not only do victims often fail to receive the vitally important services and supports they need (as they are more likely to suffer a host of long-term health effects),^{xiii} but serial criminals are left unpunished and free to strike again. And the message this sends to the broader community and future offenders? You can rape with impunity; that's just what happens in college.

We can, and must, do better if we ever hope to make real progress combatting this problem. The task force can and should advance this goal by supporting partnerships between colleges and universities and local law enforcement.

Formalizing the role and responsibility of law enforcement in the response to on-campus sexual violence isn't simple, particularly as college police forces vary widely in their powers and responsibilities and relationship to surrounding law enforcement agencies. It raises legitimate concerns that must be thoughtfully addressed, such as how to handle victims' desire to remain anonymous or to decline prosecution. There are also very real, practical resource constraints. But in the end, until we find a way to engage and partner with law enforcement, to bring these crimes out of the shadows of dorm rooms and administrators' offices, and to treat them as the felonies that they are, we will not make the progress we hope.

De-emphasize Internal Judicial Boards

The FBI, for purposes of its Uniform Crime Reports, has a hierarchy of crimes — a ranking of violent crimes in order of seriousness. Murder, of course, ranks first. Second is rape. It would never occur to anyone to leave the adjudication of a murder in the hands of a school's internal judicial process. Why, then, is it not only common, but expected, for them to do so when it comes to sexual assault? We need to get to a point where it seems just as inappropriate to treat rape so lightly.

While we respect the seriousness with which many schools treat such internal processes, and the good intentions and good faith of many who devote their time to participating in such processes, the simple fact is that these internal boards were designed to adjudicate charges like plagiarism, not violent felonies. The crime of rape just does not fit the capabilities of such boards. They often offer the worst of both worlds: they lack protections for the accused while often tormenting victims.

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We urge the federal government to explore ways to ensure that college and universities treat allegations of sexual assault as they would murder and other violent felonies. The fact that the criminal justice process is difficult and imperfect, while true, is not sufficient justification for bypassing it in favor of an internal system that will never be up to the challenge.

While there are undoubtedly university officials wholeheartedly committed to treating these claims with seriousness, and examples of campuses independently doing the “right thing” in the wake of claims of sexual violence, stories abound of the mishandling of such cases. In just recent months, reports of mishandled cases at USC, Dartmouth College, Swarthmore College, University of Montana, Vanderbilt University, Occidental College, Penn State University, the University of Connecticut, the University of North Carolina, and Berkeley have flooded the Department of Education.^{xiv} In fact, in 2013 alone, the department’s Office on Civil Rights received 30 complaints against colleges and universities around these issues – a 76% increase over the prior year, when 17 complaints were filed. The complaints say the schools violated students’ civil rights by not thoroughly investigating sexual assaults, and failed to obey Clery Act mandates around tracking and disclosure of these crimes. And while significant fines have been levied against a handful of institutions (notably a \$165,000 fine imposed on Yale University), enforcement of Clery Act requirements and response to on-campus claims of sexual assault has been uneven.

It is, therefore, imperative that colleges and universities partner with local law enforcement around these crimes – from the time of report to resolution. In practical terms, this means ensuring that campus protocols and policies explicitly spell out what that partnership looks like – who is responsible for reporting an alleged crime to law enforcement? When must that occur and how will a victim be involved in that process (to address legitimate concerns around confidentiality, maintaining control over decision-making, etc.)? What procedures will on-campus health officials utilize to ensure, whenever possible, evidence collection occurs in the wake of a sexual assault? The answers to these questions will vary from campus-to-campus, jurisdiction-to-jurisdiction.

We urge the federal government to establish best practices in the area of law enforcement/campus partnerships to address incidents of sexual violence, and to support efforts to institutionalize such partnerships. We also urge the task force to consider the adoption of a system similar to the Defense Department’s, which allows for “restricted” reports that enjoy a level of confidentiality, in addition to standard reports. Given the overall importance of informed decision making by victims of sexual assault, we also refer you to DoD’s process of a trained advocate walking a victim through a form^{xv} outlining the victim’s rights, options, etc., before a report is filed.

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Additional Recommendations and Comments From the Community

When this Task Force was announced, RAINN issued a survey to 100,000 supporters, requesting input from the community on this issue. We received an overwhelming number of responses from survivors, victim advocates, law enforcement personnel, campus officials and faculty members, prosecutors, and others. For your consideration, we have summarized some of the most common and most powerful suggestions in the appendix to this letter. Many responses echo our own recommendations above.

Conclusion

To summarize some of our key points:

Colleges and universities must:

- Take the crime of sexual assault seriously and impose meaningful, public sanctions when wrongdoing is found and crimes are substantiated.
- Investigate every claim of sexual assault reported.
- Partner with local law enforcement on each investigation, starting immediately after a crime is reported.
- Ensure victims have access to comprehensive support systems (campus, local and national) and forensic medical exams.
- Ensure that campus policies and procedures are comprehensive and campus-specific.
- Educate the campus community on their rights and roles in the wake of sexual violence, including information about bystander intervention and risk-reduction.
- Educate all members of the campus community on the school's policies and procedures in the wake of a claim of sexual assault, and communicate, from the top down, a zero-tolerance policy of sexual violence.

The federal government should:

- Spearhead and invest in rigorous, continuing research to assess what messaging is (and is not) working to further the overall goal of decreasing sexual violence on campus and taking rapists off our college campuses and streets.
- Impose meaningful sanctions for violations of federal law, including the Clery Act and Campus SaVE Act.
- Support innovative approaches and technologies to ensure that there is transparency around this issue, and to enhance schools' ability to respond to and prevent sexual violence.

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- Require all colleges and universities to disseminate to all members of the campus community the phone number and URL for the National Sexual Assault Hotline in addition to campus and local resources.

Thank you for the opportunity to provide perspective and recommendations on this critical issue. Please do not hesitate to contact me with questions. I look forward to continuing to work with you towards our shared goal of eliminating sexual violence on campuses.

Sincerely,

Scott Berkowitz
President

Rebecca O'Connor
Vice President for Public Policy

ⁱ National Institute of Justice & Centers for Disease Control & Prevention. *Prevalence, Incidence and Consequences of Violence Against Women Survey*. 1998.

ⁱⁱ White House Council on Women and Girls, *Rape and sexual Assault: A Renewed Call to Action*, January 2014, at 15, citing Kilpatrick, D.G., Resnick, H.S., Ruggiero, K.J., Conoscenti, L. M., & McCauley, J. (2007). *Drug facilitated, incapacitated, and forcible rape: a national study* (NCJ 219181). Charleston, SC: Medical University of South Carolina, National Crime Victims Research and Treatment Center.

ⁱⁱⁱ Greenfield, L.A. *Sex Offenses and Offenders: An Analysis of Data on Rape and Sexual Assault*, Washington, D.C.: U.S. Department of Justice, Bureau of Justice Statistics, 1997.

^{iv} Lisak, D. & Miller, P.M., 2002. "Repeat Rape and Multiple Offending Among Undetected Rapists." *Violence and Victims* 17(1), 73-84.

^v *Id.*

^{vi} *Supra.*

^{vii} See, Lisak, D., *Understanding the Predatory Nature of Sexual Violence*, at 8. Available at:

<http://www.middlebury.edu/media/view/240951/original/>

^{viii} Text available at: <http://www.scribd.com/doc/203276038/Campus-Sexual-Assault-Letter-Speier-Mahoney>

^{ix} See, e.g., Oregon State University ([http://oregonstate.edu/dept/security/sexual-And assault-risk-reduction](http://oregonstate.edu/dept/security/sexual-And%20assault-risk-reduction)); and the University of Chicago (<http://csl.uchicago.edu/get-help/resources-sexual-violence-prevention>)

^x Baker, Katie J.M., "Does it Matter If Colleges Plagiarize their Sexual Assault Policies?" *Newsweek*, February 5, 2014. Available here: www.newsweek.com/does-it-matter-if-colleges-plagiarize-their-sexual-assault-policies-228086.

^{xi} Available here: <http://ovc.ncjrs.gov/vision21/outcome.html>

^{xii} See, <http://mashable.com/2012/05/06/tech-college-infographic/>

^{xiii} Survivors of sexual violence are at an increased risk for depression, PTSD, substance abuse, suicide, and sleep disorders. For additional information, see: <https://www.rainn.org/get-information/effects-of-sexual-assault>

^{xiv} The following Universities have had a federal complaint filed against them: Penn State University, Dartmouth College, Harvard Law School, Princeton University, University of North Carolina at Chapel Hill, Amherst College, Vanderbilt University, University of California, Berkeley, University of Southern California, Occidental College, University of Colorado, Boulder, Swarthmore College, Hanover College, University of Connecticut, Cedarville University, Emerson College, University of Virginia, Carnegie Mellon University, University of Akron, University of Texas-Pan American, Hobart and William Smith Colleges, University of Chicago, University of Montana, Yale University, University of Notre Dame, University of Missouri, Oklahoma State University, University of Indianapolis, Florida State University, Columbia University.

^{xv} See, e.g., DD 2910 form at <http://www.sapr.mil/public/docs/miscellaneous/toolkit/dd2910.pdf>

APPENDIX COMMENTS TO THE WHITE HOUSE TASK FORCE TO PROTECT STUDENTS FROM SEXUAL ASSAULT February 28, 2014

Methodology

Between January and February 2014, RAINN conducted an online survey of members of the sexual assault community, requesting their responses to the following questions:

1. What should colleges do differently to prevent sexual violence?
2. How should colleges improve the way they handle or investigate a reported sexual assault?
3. How can colleges improve the way they treat victims of sexual assault?

Respondents were invited to identify themselves as a student, survivor, faculty/administration member, and/or other, or to remain anonymous.

Summary of Responses

The most common themes in the comments we received were:

- Take this issue and each and every claim of sexual violence seriously.
- Do not handle investigations in-house. Involve local law enforcement and other system actors.
- Believe victims when they come forward, and establish systems of support throughout the process that unfolds.
- Assess what's working (and what isn't). Bring in third parties to audit this.
- A zero tolerance message is essential, but will only work if it comes from the top (university presidents) and if it has teeth (imposition of meaningful sanctions).
- Training and education is important – there can never be too much on this topic, and it has to start early.
- Make the system transparent: tell people who should and can report and how, and where help (both on-campus and off) is available.

Select responses are summarized and provided below, grouped by general topic of remark.

Take and treat this issue seriously.

Overwhelmingly, the top response to our survey was the sentiment that colleges and universities need to treat sexual violence as a serious crime. Over and over again, survey respondents said that if anything is going to change, schools must take each and every allegation of sexual violence seriously.

"We faculty teach students throughout the semester how serious plagiarism is. Why not do the same for rape?"

- *faculty member*

"Don't say things like 'boys will be boys' or 'he lacks emotional intelligence.'"

- *student and survivor*

"We need support from the top. College administrators should directly engage with campus communities on sexual assault. We need to hear about this from the highest level."

- *faculty member*

Investigate each and every claim; involve law enforcement.

Multiple respondents lamented the practice of colleges and universities handling claims of sexual violence and subsequent investigations and proceedings "in house."

"Unless there are more convictions, these crimes will continue to go unreported. In my situation, those who attacked me were not only aware of the conviction rate – they told me what it was. This must be changed."

- *college administrator*

"Handle incidents of sexual crime through municipal law enforcement rather than through college channels which only try to keep the school's name out of the press."

- *alumnus; friend of multiple survivors*

"College administrators should not be replacing the criminal justice system."

- *mother of survivor*

"External, independent investigations [are] the only way to assure an unbiased investigation."

- *survivor*

Impose meaningful, not ceremonial punishments.

Another common refrain was the need to go beyond telling the campus community that these crimes are taken seriously – respondents cited the need to demonstrate that through meaningful, not ceremonial, punishments and sanctions.

"Stop the culture of impunity for rapists. If rapists on campus faced the same penalties for rape as rapists off campus, there would be considerably less rape. Light sanctions only give a green light to rape, and make a campus a 'free-rape zone' instead of a 'rape-free zone.'"

- *faculty member*

"If we don't expel students for rape, what do we expel them for?"

- *faculty member*

"The offender should be [upon conviction] permanently removed from campus. Too often the victim transfers to another university when the offender is permitted to come back and resume classes."

- *student and survivor*

"Mandate suspension or expulsion for students that are legally convicted of rape or sexual assault from the university. Punish students that harass survivors for reporting rape or attempting to intimidate them..."

- *student and survivor*

External Assessment

More than one respondent suggested that the federal government mandate third-party audits of schools' sexual assault policies and procedures.

"Institute independent, third party audits of protocols."

- *faculty member/administrator*

Coordinated Community Response

"Colleges should be included in the local SART (sexual assault response team) in the community. If they don't have one, one should be formed. This should include campus police, as well as law enforcement in the community, the district attorney's office, sexual assault advocates and SANEs, and others."

- *Sexual assault service provider in a college town*

Enhanced Support and Accommodations for Alleged Victims

"Colleges should perhaps have two counselors on staff – one male, one female – who are educated psychologists (or other professionals) specifically trained to deal solely with issues of sexual assault (either on or off-campus)."

- *student and survivor*

"Make policy clear that students' health and safety come before getting in trouble for underage drinking/drug use. The student needs to feel that their school is a safe place to talk about sexual assault and a good resource for related services."

- *student and survivor*

"Trained and effective counselor, trained big brothers/sisters style support [for victims]."

- *student and survivor*



One of "America's 100 Best Charities"
— *Worth* magazine

"Living quarters changes [for the alleged victim], zero-cost option to take an absence from classes, the option to resume a class at the same point with the same accumulated grade point the next semester."

- *student and survivor*

"Immediate options for administrative support such as changing the victim's or the accused's class schedule."

- *student and survivor*

"Information about where I could have gotten help and reported things online would have been huge."

- *survivor*

Increased Security Measures

"Increased campus security presence (and training so that they know how to help and respond to these types of crimes)."

- *student*

"An app or other service that lets you call for help on campus with just a push of a button on your cell phone."

- *student and survivor*